

South Somerset District Council – Detailed Analysis of Consultation Responses

The following tables provide a detailed analysis of responses received during the consultation process for the Proposed Modifications to the Submission Local Plan (2006-2028). It is important to note that these tables do not provide a response to all of the consultation responses received. Instead they focus on those issues which may result in amendments to the Proposed Main Modifications. The responses have been grouped by each of the Proposed Main Modifications, but also by the theme that they represent.

Soundness Issue 1: Yeovil Sustainable Urban Extension, Policy YV1 & SS5, Proposed Main Modification 1

Yeovil Sustainable Urban Extension		
Issue		SSDC Response
1	Scale of housing	
	Recent population growth has been the largest in history so it is essential that sufficient housing land is available.	Noted – the plan makes provision for meeting housing need. Recommendation: No change to PMM1, or Policy YV1 or SS5
	Inconsistent references to 7,441 dwellings at Yeovil – one says “at least 7,441” whilst another is simply “7,441”.	Agree that this inconsistency needs resolving – Policy YV1 states at least 7,441 dwellings, whereas Policy SS5 states of which 7,441 dwellings. The inclusion of the words “at least” was agreed at the examination (see M244 in Additional Minor Modifications Arising from the Council and Objectors Statements and Inspector’s requests for clarity, June 2013 - Core Document 3c) to give clarification that the housing figures are “at least” targets, therefore add the words “at least” to Policy SS5 as below. Recommendation: Add the words “at least” after the word “which” and before “7,441” in Policy SS5.
	The ONS states there were 2.27 persons per household in 2011, and projections up to 2028 do not fall below 2.18, so the ‘Housing requirements for South Somerset and Yeovil’ report figure of 2.1 is incorrect. This would reduce the requirement by 400 dwellings.	It is of significance that the Inspector considered these topics during the Examination Hearing Sessions, but did not then raise these issues in his Preliminary Findings. As such, these issues have not formed part of the additional work undertaken by the Council. The Inspector, in his letter of the 28 th January 2014, has re-iterated that he will consider “ <i>only objections to the MMs</i> ” at any future Hearing Sessions. As such the Council does not think that this issue is something which needs to be reconsidered at this time, as it does not feature as part of the Proposed Main Modifications.

		<p>However, by way of clarification, this 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 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. Recommendation: No change to PMM1, or Policy YV1 or SS5</p>
	<p>Concerned with text in para 2.7 stating “as housing need has progressively reduced” as there is no evidence to suggest a decrease in housing need over the plan period.</p>	<p>Agree – this text requires clarification. Recommendation: Minor text amendment to the first sentence of para 2.7 to state “As the housing <u>requirement in Yeovil</u> has progressively reduced...”</p>
	<p>Future masterplanning should recognise the potential of sites to meet long term development post 2028.</p>	<p>Agree this should be considered in the future masterplanning, where appropriate, and this is recognised in the Local Plan explanatory text (para 5.46). Recommendation: No change to PMM1, or Policy YV1 or SS5</p>
	<p>There should be more housing at the lower tier settlements in order to improve deliverability, rather than concentrate development in two large urban extensions at Yeovil.</p>	<p>Disagree - the Council’s Examination Hearing Statements (007-014) explain why the Local Plan’s overall policy for growth and change in lower tier settlements (i.e. outside Yeovil) is considered to be appropriate. Additionally the issue of distribution of housing across the settlement hierarchy was discussed at the</p>

		<p>Local Plan Examination Hearing Sessions (notably under Issue 2 (settlement hierarchy), 3 (economic prosperity) and 4 (district wide housing provision), and the detailed methodology is outlined in the Housing Topic Paper [CD14].</p> <p>Recommendation: No change to PMM1, or Policy YV1 or SS5</p>
<p>More homes should be located at Yeovil in order to address the current significant undersupply of housing. Deleting reference to 935 dwellings post plan period reduces the flexibility of housing supply.</p>	<p>Disagree - the Council's Hearing Statement (005) explains why the Local Plan's overall policy for growth and change in Yeovil is considered to be appropriate. The issue of distribution across the settlement hierarchy is as set out above.</p> <p>Flexibility of housing supply remains as the district-wide requirement is "at least 15,950 dwellings" i.e. more housing can be delivered. Chapter 13 of the Local Plan states that a five yearly comprehensive review of the Local Plan will take place, which will identify any issues relating to housing delivery; and also outlines the response if housing supply is not occurring as planned.</p> <p>Recommendation: No change to PMM1, or Policy YV1 or SS5</p>	
<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>The Council's evidence base for housing and employment growth was discussed 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.</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 Hearing Statement (H036). The percentage distribution of job growth (and consequent housing growth) amongst the settlement hierarchy was reconfirmed.</p> <p>Recommendation: No change to PMM1, or Policy YV1 or SS5</p>	
<p>Welcome amendment to delete proposal to provide housing beyond the plan period.</p>	<p>Support noted.</p> <p>Recommendation: No change to PMM1, or Policy YV1 or SS5</p>	
<p>If other omission sites were considered, it could remove the need for the SUE altogether.</p>	<p>The justification for change for PMM1 and PMM2 explains that four areas were reconsidered as 'reasonable alternatives' for growth in Yeovil. Using the SA Addendum, SA objectives and latterly a further Criteria Assessment has resulted in a change from one SUE to two SUEs. The level of growth in Yeovil has been</p>	

		<p>fully justified in the Council's Hearing Statement (H005) which explains why the Local Plan's overall policy for growth and change in Yeovil is considered to be appropriate.</p> <p>Recommendation: No change to PMM1, or Policy YV1 or SS5</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 has revised the SA in light of the significant issues of concern raised by the Inspector. Independent consultants Enfusion have undertaken a fresh SA of growth options in Yeovil.</p> <p>In order to satisfy the tests of soundness set out in the NPPF, the Local Plan must be "positively prepared", "justified", "effective" and "consistent with national policy". In order to be effective, the Local Plan must focus on delivery within the Local Plan period (e.g. 2006 – 2028). As such, it is appropriate and robust that the objectively assessed need for Yeovil within the Local Plan period is reflected in Policy SS5.</p> <p>Additional SA work undertaken by Enfusion along with the Council's own assessment of deliverability and viability issues in Yeovil has reiterated that it is important that the base assessment figure of identified housing need should be used in order to create a consistent appraisal of potential growth options.</p> <p>Recommendation: No change to PMM1, or Policy YV1 or SS5</p>
	<p>The key messages and conclusions are difficult to follow, particularly the PMM consultation document which will be key to any re-opened Examination.</p>	<p>Agree.</p> <p>Recommendation: Minor text amendments required to make the justification clearer.</p>
	<p>The national priority for delivering more housing (as set out in the NPPF) is missing from the plan, which is more comfortable dealing with environmental issues rather than meeting the social and economic needs of the town. Growth at Keyford can be delivered quickly, as supported by the previous Planning Inspector.</p>	<p>Para 2.11 of the PMMs consultation document sets out housing delivery as being of key importance. The Keyford site is being proposed for the urban extension as part of the Coker direction of growth.</p> <p>Recommendation: No change to PMM1, or Policy YV1 or SS5</p>
	<p>Main options for the resumed Examination are: allocate 2,500 dwellings in a single site to the south; allocate 2,500 dwellings across two or more sites with between 800 and 1,750 at Keyford; allocate 1,565 at Keyford or as proposed in the PMMs – the option for delay should not be considered.</p>	<p>Noted.</p> <p>The Council is not presenting an option for delay. Policy YV1 sets out an approach to deliver the housing requirement for Yeovil inside the Local Plan period. The Council's housing evidence basis, as noted in the Full Council Report - Schedule of Proposed Amendments to Proposed Submission Local Plan 2006-2028 (January 2013) (Core Document 13) and Housing Topic Paper (January 2013) (Core Document 14) clearly shows the trajectory of sites, and the</p>

	breakdown of requirement within Yeovil. Additional SA work undertaken by Enfusion along with the Council's own assessment of deliverability and viability issues in Yeovil has demonstrated that none of the growth Options appraised could sustainably deliver 1,565 dwellings on one site. As such, 1,565 dwellings across two Sustainable Urban Extensions have been set out to limit the impact of development and achieve more sustainable growth in Yeovil. Recommendation: No change to PMM1, or Policy YV1 or SS5
There should be no further development in Yeovil in order to preserve the town's integrity and market town appeal.	Yeovil is the key centre for employment, services and facilities in South Somerset, so is rightly the focus for new development to build upon its existing role and function. This issue has not been raised in the Inspector's Preliminary Findings. Recommendation: No change to PMM1, or Policy YV1 or SS5
To meet 7,441 dwellings at Yeovil, a completion rate of 392 per year is required, an increase of 77%.	The Housing Trajectory put forward by the Council as Modification 75 [Core Document 3b] identifies that the overall district housing provision and individual settlement specific provisions to 2028 are deliverable. Additionally the issue was discussed at Hearing Session 4 of the Local Plan Examination in May 2013. Recommendation: No change to PMM1, or Policy YV1 or SS5
Need to consider the relocation of army units to the area from Germany, and the need for extra housing.	MOD housing has already been considered in finalising the District's housing requirement as outlined in the Council's mid hearing statements H007, H043 and response to the Local Plan Inspector's Question 4: 17.4.13. Recommendation: No change to PMM1, or Policy YV1 or SS5

Soundness Issue 1: Yeovil Sustainable Urban Extension, Policy YV2 & YV6, Proposed Main Modification 2

General/other issues		
	Issue	Response
1	Agricultural land quality	
	The loss of grade 1 agricultural land is a red-herring and compromise, as all existing key sites are grades 1, 2 and 3, and the proposed Bunford business park is mostly grade 1. There is little distinction between grades 1, 2 and 3a, as recognised in Natural England Technical Information Note TIN049, NPPF para 112 and Annex 2.	Noted, but the proposed Bunford business park is actually grade 3a [CD135g]. Grades 1, 2 and 3a are defined as best and most versatile (NPPF, Annex 2), the land which is most flexible, productive and efficient and which can best deliver future crops (Natural England TIN049). MAFF guidance (Oct 1988) classes grade 1 as 'excellent', grade 2 as 'very good' and grade 3a as 'good'. Local authorities should take into account the economic and other benefits of the best and most versatile land, and should seek to use areas of poorer quality land in preference to that of a higher quality (NPPF, para 112). Recommendation: No change to PMM2, or Policy YV2 or YV6
	The loss of grade 1 agricultural land is no longer considered to be of national importance (Hinkley Point public inquiry, para 5.6.7, 5.6.17).	Disagree – the NPPF states that local authorities should take into account the economic and other benefits of the best and most versatile land, and should seek to use areas of poorer quality land in preference to that of a higher quality (para 112). The Hinkley reference is not directly relevant, but (for information) the Hinkley Point Panel Report does not mention agricultural land quality; the application for site preparation works for Hinkley Point was considered before the NPPF, and the land there is mostly grade 3b (73%), with some 3a (14%) and 4 (13%). Recommendation: No change to PMM2, or Policy YV2 or YV6
	The quality of agricultural land to be used should be considered alongside its size compared to all available agricultural land.	Noted, the loss of high quality agricultural land as a result of the proposed urban extension is a small proportion of its total area in the district. For example, the Coker Sustainable Urban Extension 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). Recommendation: No change to PMM2, or Policy YV2 or YV6
2	Landscape/pollution impact	
	The Council have not followed the guidelines issued by the Landscape Institute – landscape planning should be embedded from conception, and it is clear that impact on landscape is a secondary consideration.	This assertion is incorrect the landscape studies to date have informed site search and selection, and will continue to inform site development. This ensures, and will continue to ensure, that landscape planning is embedded from the start, consistent with best landscape practice. Recommendation: No change to PMM2, or Policy YV2 or YV6

	Will increase carbon dioxide emissions, air, noise and insufficient consideration is given to the preservation of dark skies to the south of Yeovil.	These issues are considered in the Strategic Growth Options for Yeovil SA report, specifically under objectives 11 and 12. Light from existing development to the south of Yeovil is already visible, including the rugby ground lights and the A37. Negative effects are identified, but mitigation through policies EQ1, EQ2 and EQ7 should ensure effects are not significant, consistent with the NPPF (para 125). Recommendation: No change to PMM2, or Policy YV2 or YV6
3	Historic Environment	
	The historic environment is a non-renewable resource once lost it is gone forever.	The value of the historic environment is acknowledged, and it has been an important consideration in the Sustainability Appraisal of potential options for growth in Yeovil and potential mitigation measures. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Council should be doing its best to protect gems such as Aldon Park, Nine Springs, Yeovil Country Park, surrounding countryside, historic parkland.	The presence of historic assets has been a key consideration, it is contended that the plan conserves and enhances these assets, whilst providing for development requirements. This has been an important consideration in the Sustainability Appraisal of potential options for growth in Yeovil and potential mitigation measures. Recommendation: No change to PMM2, or Policy YV2 or YV6
4	Flood risk	
	Principles of Climate Change Policy EQ1 should prevent inappropriate development being located in Flood Risk areas through the application of the NPPF's Sequential Test.	Comment noted. Recommendation: No change to PMM2, or Policy YV2 or YV6
	For the directions of growth through the strategic allocations there will need to be further work within the masterplanning stages to more accurately map any local flood risk issues.	Comment noted. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Consider that there will be an engineering solution to surface water run-off, 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. FRMS is essential to understand any possible constraints on land availability required from the development and the future Sustainable Drainage	Comment noted. Agreed that a Flood Risk Management Strategy for the Yeovil urban extensions should be undertaken. Recommendation: No change to PMM2, or Policy YV2 or YV6. South Somerset District Council to undertake a Flood Risk Management Strategy as part of the Site Allocations DPD / masterplanning process.

	scheme (SuDS). The SuDS scheme must maximise the environmental benefits to be in accord with policies EQ1 and EQ5.	
5	Highways/traffic	
	If a traffic re-assessment is carried out, it should consider planned improvements to the highway network and the A303.	The first traffic modelling study ¹ details the methodology for modelling impacts, including the planned improvements to the road system. This has been continued through additional traffic modelling work, including the Traffic Modelling Non-technical Forecasting Addendum Report 3, February 2014. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Split development into smaller sites to lessen the impact of traffic from a single site.	Traffic modelling studies indicate that background traffic growth will remain the major contributor to increased congestion on the highway network. The modelling shows little difference in terms of the impacts from the growth options – albeit that the modelling shows greater impacts on the network by choosing to locate development in one single site, than by choosing to locate across two sites. Recommendation: No change to PMM2, or Policy YV2 or YV6
	The proposal for two sites has not been tested for its traffic impact – the north east site has potential for greater impact on the A303 junctions north of Yeovil including Hazelgrove roundabout.	The latest traffic modelling ² shows very limited impact on Cartgate roundabout junction operation from the development options, but the reference case shows it is forecast to be over capacity in AM and PM peaks. Although Hazelgrove roundabout is outside of the modelling area, there is negligible difference on traffic flows along the A359 Mudford Hill resulting from the Upper Mudford direction of growth compared with the reference case. Further discussions with SCC and the Highways Agency (14.02.14) have confirmed that the impacts on Hazelgrove roundabout are not significant. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Concerned that the serious congestion on the A30 and surrounding rural roads will be made worse from the proposed development, so it is important that sustainable travel is encouraged and addressed in further detail in the masterplan and Site Allocations DPD – welcome input into these.	The concerns are noted, and congestion will be mitigated through sustainable travel measures. Several parts of the A30 have been modelled for the future traffic impact, along with the key junctions. ³ The Proposed Main modification to deliver growth on two SUEs has been shown to have the least impact on the A30 in the latest traffic modelling. There is a significant reduced impact in comparison to choosing to locate development on one single site. The offer of

¹ Chapter 2 in the Non-technical forecasting report, Somerset CC, February 2011.

² Yeovil SUE – traffic modelling Non-technical forecasting addendum report 3, February 2014.

³ Yeovil SUE – traffic modelling Non-technical forecasting addendum report 3, February 2014.

		inputting at the masterplanning/Site Allocations DPD stage is welcomed. Recommendation: No change to PMM2, or Policy YV2 or YV6
	All options have the potential to exacerbate current congestion issues.	Noted – And this is indeed borne out by the latest modelling information. However, the impact is predominantly due to background traffic growth from existing development activity in the town. Furthermore, Policy YV6, and Policies TA1, TA3, TA4 and TA5 will to minimise car travel and achieve more sustainable travel measures. Recommendation: No change to PMM2, or Policy YV2 or YV6
6	Sustainable travel potential	
	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.	Noted, a change may be necessary to the non-car travel requirement in policy YV6 to reflect the change from a single larger urban extension to two, and the deletion of a secondary school from policy YV2. Recommendation: Potential change to Policy YV6. Continue work in conjunction with Somerset County Council to inform a realistic level of non-car travel in policy YV6, reflecting two smaller urban extensions.
	Concerned that the 50% sustainable travel target is unrealistic due to the much diminished scale of the urban extensions; and that two sites will make it more difficult to collect the required contributions towards transport improvements.	See above. Recommendation: Potential change to Policy YV6. Continue work in conjunction with Somerset County Council to inform a realistic level of non-car travel in policy YV6, reflecting two smaller urban extensions.
	Concern over electric cars and a lack of evidence as to their potential use – suggest Quality Bus Partnership is the better option.	A variety of sustainable travel measures will be required in order to promote sustainable travel, and both of the measures mentioned are included in policy YV6. Recommendation: Potential change to Policy YV6. Continue work in conjunction with Somerset County Council to inform a realistic level of non-car travel in policy YV6, reflecting two smaller urban extensions.
	It is not easy to simply extend a bus service – need a comprehensive development to make a service commercially viable.	The Proposed Main Modifications revise Policy YV6. This now seeks to contributions towards establishing a Quality Bus Partnership to deliver modern desirable bus routes with a frequent service that is designed to establish end to end journey times that are better or more comparable to those by private car together with clean vehicle technology and improvements to public transport information. This approach will look at the SUEs, but will also work in conjunction with the

		<p>district-wide Transport Policies to establish a more effective public transport network. Development in Yeovil (not just in the SUEs) should be able to facilitate enhancements to the public transport network.</p> <p>Recommendation: Potential change to Policy YV6. Continue work in conjunction with Somerset County Council to inform a realistic level of non-car travel in policy YV6, reflecting two smaller urban extensions</p>
	There are no sufficient plans or proposals to take account of sustainable travel modes, e.g. no provision for increase in public transport, cycling, walking, electric vehicles.	<p>Policy YV6 sets out a series of measures to promote sustainable travel, and further work will take place in support of the Site Allocations DPD.</p> <p>Recommendation: No change to PMM2, or Policy YV2 or YV6</p>
	The deletion of the requirement for low emission bus routes and real time passenger information is inconsistent with the Council's argument that two urban extensions are no less sustainable than a single extension.	<p>The decision to make alter the approach within Policy YV6 was taken at Full Council in January 2013, prior to the decision to identify two SUEs. Policy YV6 and the other Local Plan policies provide a framework to deliver sustainable transport provision.</p> <p>Recommendation: No change to PMM2, or Policy YV2 or YV6</p>
7	Social infrastructure	
	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>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 be in the Local Plan.</p> <p>Recommendation: Text amendment should be made to the seventh bullet point in Policy SS6: Infrastructure Delivery entitled Community facilities, to include the phrase “including Early Years, Primary and Secondary educational provision”.</p>
	There is a lack of evidence from the Education Authority about education requirements to support the two urban extensions. Smaller development sites will mean secondary school will not be sustainable or viable. Issue has been ducked - a larger single site has a much better chance of identifying the land required. If it is a 'requirement' it should be in the plan.	<p>Agree that further work on secondary school provision is required. However, at this point in time, the Education Authority have stated that there is sufficient capacity to accommodate growth in Yeovil, and that no further capital expenditure is planned.</p> <p>Work is required to more thoroughly understand the issues and options for delivering a secondary school in Yeovil. This includes a detailed assessment of the capacity within the existing 3 secondary schools, and the ability to increase</p>

	Also need assurance that sufficient tertiary education places are available.	capacity and for how long. This work should investigate the potential level of S.106 / CIL contributions, and outline a long term strategy to resolve secondary school issues within Yeovil. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Concerned that policy no longer makes specific provision for secondary education, despite acknowledging that it is still a requirement. This delivery is required to avoid further pressure on Dorset schools, especially The Gryphon, Sherborne.	See response above. Recommendation: No change to PMM2, or Policy YV2 or YV6
	These are substantial expansions that will outstrip current GP and pharmacy provision. Concerned about the ability of the hospital to cope with the extra patients (including car parking).	PMM2 identifies a new health centre in each of the SUEs. Lack of capacity at the hospital was not identified as an issue in the Infrastructure Plan, It is considered that appropriate references are given in policy YV2. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Objects to point ii of YV6 – does not take into account the needs of the elderly or infirm who need to be able to park close to their homes.	Noted, an appropriate level of disabled parking spaces will be required, consistent with the Somerset Parking Strategy and policy TA6. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Yeovil Infrastructure Impact Assessment is out of date (close to being 5 years old). Proposed Main Mods exhibit contempt for viability and deliverability considerations.	The Infrastructure Planning report [CD36] has been the key evidence on this issue. This was produced in 2012. Evidence indicates that both SUEs are deliverable within the plan period. Additional viability and deliverability work has been produced to accompany the Strategic Growth Options for Yeovil: Sustainability Appraisal Report. Recommendation: No change to PMM2, or Policy YV2 or YV6
	No consideration of how secondary aged children living in the two urban extensions are expected to get to distant schools in safe or sustainable ways.	The majority of housing growth in Yeovil will be within the existing urban area, which are located in reasonable proximity of existing secondary schools. The Local Plan does facilitate sustainable travel links to key destinations (penultimate paragraph of policy YV6). Recommendation: Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.
	Yeovil needs time to consolidate. Most of the towns shopping needs are fulfilled by a trip to Sherborne. Plan is detrimental to the social and economic well-being of the town.	New development of the scale envisaged can help to support the economy of the town, such as providing additional patronage for existing shops, encouraging additional retail, job growth linked to the construction of new development, and more directly through making provision for employment land

		in the Local Plan. Yeovil currently has more jobs than economically active population, and the plan seeks to redress this balance. ⁴ Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.
8	Access to services/employment	
	Do not need additional employment land as numerous buildings already have planning permission or are empty, and new land could draw business from existing employment land.	The provision of employment land (both within the SUEs and within the urban area of Yeovil) is to facilitate the economic-led strategy for the town and to help deliver long term growth. Provision of employment land is as much about the land being in the right place, of the right type, and the right quality; as opposed to simply being about the overall quantum. The quantum has been linked directly to the housing requirement in the town, in a move to bring greater self-containment and a balanced approach to growth. Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.
	Object to industrial and retail being interspersed with housing as this will not be attractive to potential residents.	This is a matter for detailed planning applications and masterplanning, but it is envisaged that the housing and employment can be appropriately sited and designed to avoid such issues. Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.
	Employment development should be located near to existing sites. The future of AgustaWestland is not certain, and they may want to redeploy the business back to Italy.	Future employment sites will be well connected to the existing urban area of Yeovil. There is no evidence to suggest that Agusta Westland's future is uncertain. The Council and its partners continue to work alongside Agusta Westland and other businesses to support economic growth. Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.
9	Housing deliverability	
	A significant proportion of both sites is in the ownership of the same developer, which is likely to slow down delivery as the developer is unlikely to want to deliver a high number of units (housing and employment) on each site so as to undermine their value.	This is not an issue as the proposed reduced Coker Direction of Growth is not in the ownership/control of the developer associated with the Direction of growth at Upper Mudford. ⁵ Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.
	Smaller, more deliverable sites should be identified as these are less risky and more attractive to developers, and would therefore deliver housing to meet needs in the current lack of a five year supply.	In accordance with the presumption in favour of Sustainable Development set out in paragraph 14 of the NPPF the District Council is taking a positive approach to development in the context of the current lack of a 5 year housing land supply. As noted in Item 11 of Project Management Board Workshop 30,

⁴ Table 3.4, Settlement Role and Function Study, 2009.

⁵ Source: Strategic Housing Land Availability Assessment 2013

		<p>25 October 2013, there is clear intent for developers and landowners to deliver development on the Coker and Upper Mudford sites. Paragraph 3.22 of the Strategic Growth Options for Yeovil, Sustainability Appraisal Report (October 2013) identifies that based on other major developments in the district since 2006, developments of less than 500 dwellings have not been required to make provision of a primary school or on-site formal playing fields and other community facilities in South Somerset, therefore a number of smaller sites will not deliver the social infrastructure to support a sustainable urban extensions.</p> <p>Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.</p>
	<p>There is little information regarding the masterplanning, and infrastructure costs and requirements for two urban extensions, but these costs are likely to be more than for a single site, which could inhibit the delivery of new housing.</p>	<p>The Council's approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013).</p> <p>It is advocated that the two SUEs allow for a more comprehensive approach to supporting existing and/or delivering new infrastructure, based upon a more holistic approach to infrastructure provision across the whole of Yeovil. This would be in addition to the site specific mitigation necessary for each site to ensure it mitigates its impacts.</p> <p>For example, the Inspector in his Preliminary Findings (para 25) highlighted that in considering potential growth options and the impacts on public transport <i>"there is no reason to suppose that existing services elsewhere in the town could not be improved to accommodate demand from an urban extension."</i></p> <p>Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.</p>
	<p>Two urban extensions will materially improve the housing supply rather than reliance on a single urban extension and is better aligned with the NPPF objective to "significantly boost housing supply".</p>	<p>Housing requirement for South Somerset and Yeovil Baker Assoc, 2011 [CD 30] saw an achievable market capacity of 2,640 dwellings to 2026 within a single sustainable urban extension to Yeovil delivering around 250 dwellings per annum, the point is also made that three separate urban extensions could deliver around 360 dwellings per year. The report goes on to state that overall market capacity for Yeovil could be increased by raising the number of urban extensions (paragraphs 8.31 and 8.32). The respondents comment supports this view and that expressed in Item 11 of Project Management Board Workshop 30, 25 October 2013.</p> <p>Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.</p>
	<p>There are already 3 key sites under construction around Yeovil, and other sites coming forward – how</p>	<p>See response above.</p> <p>Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.</p>

	will 5 sites deliver a significantly better build rate than 4?	
	Brownfield sites and empty properties should be developed first (e.g. in the town centre) to improve the townscape of Yeovil and reduce greenfield loss.	<p>The number of empty properties in South Somerset has dropped by 500 since October 2012. This significant decrease is due to SSDC's Empty Property Strategy involving the work of several different departments and in particular the council's Empty Property Officer⁶. PMM1 anticipates 5,876 dwellings within the urban framework of the town and this would include the redevelopment of brownfield land. The majority of these dwellings are already committed however it is anticipated that around 1,408 dwellings would be delivered through windfall development [CD 3a]. The objectively assessed housing need for the town cannot be delivered without the loss of some greenfield land.</p> <p>Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.</p>
	Object as the plan appears to be a developer-led process. The addition of the Upper Mudford option will mean that the Council will have to work with two developers rather than one.	<p>Paragraph 187 of the NPPF states that for decision making “Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area”. With regards to plan – making the authority is expected to plan positively for development and infrastructure requirements (paragraph 157) as well producing a Strategic Housing Land Availability Assessment to establish realistic assumptions on the availability, suitability and economic viability of land to meet housing need (paragraph 159). None of this can be achieved without contact with the development industry. Any Local Plan that is subsequently submitted for Examination is approved by democratically elected District Council Members.</p> <p>Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.</p>
	If two sites are pursued, insert “at least 1500 dwellings be built” in the southern option to give greater flexibility.	<p>The Council’s approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013).</p> <p>To ensure that the Local Plan conforms to the NPPF, it must be “effective”. On this basis it must be deliverable over its plan period. As such it is appropriate that the SUEs only focus on delivering the necessary housing requirement for Yeovil in the plan period.</p> <p>Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.</p>

⁶ www.southsomerset.gov.uk

	<p>The national priority for housing delivery is missing from the plan, which seems to focus on environmental issues. The Keyford site can deliver growth quickly and was supported by the previous planning inspector.</p>	<p>Comment noted. It is considered that the objectively assessed district-wide housing requirement of 15,950 over the plan period 2006-2028 is in accordance with paragraph 47 of the NPPF. Paragraph 2.11 of the Proposed Main Modifications Consultation Document, November 2013, explains that the Council have considered the changing context for growth in the light of the current lack of a 5 year housing and supply and that there is evidence to suggest that the Proposed Main Modification will lead to an increased land supply in the earlier years of the plan. There is evidence to suggest that the market will deliver a greater housing build rate if a choice of sites is offered. The approach does not depart from the Local Plan's strategy of concentrating development in Yeovil and to seek high quality sustainable development.</p> <p>It is not disputed that the previous Local Plan Inspector supported the allocation of the Keyford site.</p> <p>Recommendation: No change to PMM2, or Policy YV1, YV2, YV6 or SS5.</p>
	<p>Land to the south is the preferred location by developers not the north.</p>	<p>The Strategic Housing Land Availability Assessment 2013 (SHLAA) demonstrates that there is developer interest in bringing forward land to the north of Yeovil for housing development including within the proposed Upper Mudford urban extension.</p> <p>Recommendation: No change to PMM2, or Policy YV2 or YV6</p>
	<p>Para 2.11 of Justification for Change SSDC claims "There is evidence to suggest that the market will deliver a greater housing build rate if a choice of sites is offered." This claim is entirely unsubstantiated. In other towns and cities where urban extensions have or are taking place major developers have come together in partnerships to build housing at rates no less challenging than can be delivered on separate sites.</p>	<p>Housing requirement for South Somerset and Yeovil Baker Assoc, 2011 [CD 30] saw an achievable market capacity of 2,640 dwellings to 2026 within a single sustainable urban extension to Yeovil delivering around 250 dwellings per annum, the point is also made that three separate urban extensions could deliver around 360 dwellings per year. The report goes on to state that overall market capacity for Yeovil could be increased by raising the number of urban extensions (paragraphs 8.31 and 8.32).</p> <p>The South Somerset Community Infrastructure Levy Evidence Base, January 2012 [CD 35] identifies that at very large sites such as the Yeovil UE and the Chard Eastern Development Area there is a compromise to be made when funding infrastructure on these sites, which would impact on affordable housing delivery. With regards to the single Yeovil urban extension paragraph 4.35 state: "...there is a choice to be made by the Council as to whether it retains</p>

		35% affordable housing and reduces CIL to about £32/sq.m, or whether instead it chooses to retain CIL at £100/sq.m and adjusts other cost variables, most obviously the proportion of affordable housing. If CIL is retained at £100/sq.m at Yeovil, the affordable proportion must reduce to 25% as shown on the model 2 generic viability appraisal conclusions.” Recommendation: No change to PMM2, or Policy YV2 or YV6
10	Alternative locations for the urban extension(s) (including multi-site suggestions)	
	An alternative to the urban extensions is to build a self-sufficient “Poundbury” adjacent to the A303 to give room for future expansion, access to further employment and cut down on traffic congestion.	The growth proposed in the urban extension(s) (1,565 dwellings) is not of a sufficient scale to justify a standalone ‘new settlement’. This would also be contrary to the NPPF which seeks to focus significant development in locations which are or can be made sustainable (para 17 bullet point 11, para 38). Recommendation: No change to PMM2, or Policy YV2 or YV6
	The West Dorset option is most sustainable – the Council should work with West Dorset District Council under the Duty to Cooperate, re-score the SA, and remove the PMM options.	This option was considered, but rejected due to severance between the site and the rest of the town, lack of evidence that appropriate links can be delivered to cross the key barriers of the River Yeo and railway line, and deliverability. ⁷ Recommendation: No change to PMM2, or Policy YV2 or YV6
	Promote 74 ha of land at Toll Bridge Farm, in Area ‘C’ (Dorset) for the direction of growth, with land to the north extending to 120 ha. This is in close proximity to employment, retail, leisure and the train station. It can accommodate a mixed use development of up to 1,600 dwellings (or 2,500 if land to the north is included), and committed to infrastructure provision, including land for a secondary school and walking/cycling linkage to Wyndham Park. An application is being prepared for submission in the next few months. The Duty to Cooperate has failed.	See above - This option was considered, but rejected due to severance between the site and the rest of the town, lack of evidence that appropriate links can be delivered to cross the key barriers of the River Yeo and railway line, and deliverability being uncertain as the relevant authority (West Dorset) object to the site. ⁸ The Duty to Cooperate has not failed as continual dialogue has taken place with WDDC and they are in agreement about the site not being viable. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Strongly support decision not to progress Area ‘C’ – Middle Yeo and Dorset Hillside – due to severance from the town and the potential cost of mitigating this.	Support noted. Area ‘C’ is not proposed for a direction of growth. Recommendation: No change to PMM2, or Policy YV2 or YV6.

⁷ Para 3.33 and table 4.1, Strategic Growth Options for Yeovil SA, October 2013.

⁸ Para 3.33 and table 4.1, Strategic Growth Options for Yeovil SA, October 2013.

	Also oppose due to lack of relationship with Yeovil, landscape impact, potential impacts on local villages, flood risk and reduction in the separation between Yeovil and Sherborne.	
	Object to development in Area 'F' due to impact on Thorne Coffin e.g. traffic, historic environment, wildlife, noise.	Area 'F' was not progressed further due to significant landscape sensitivities and potential effects on heritage assets. ⁹ Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Areas A and B should be developed as they would be better served by essential services (police, fire, ambulance) and have good access to A303 and M5.	Noted, but these essential services would serve a new development, regardless of location. Nevertheless, part of Area B is within the southern direction of growth. Area A was not pursued because its capacity was less than the 500 dwellings considered necessary to deliver a strategic direction of growth. ¹⁰ Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Suggest site at Stone Farm and Mudford Road that could deliver 350-450 dwellings.	This area was not considered appropriate for a direction of growth because of adverse landscape impact and having low or moderate-low landscape capacity to accommodate built development. ¹¹ Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Principle of multi-site approach supported but should not be limited to two sites as the logistics of bringing large sites forward is problematic. Lufton College site (16.6 acres) and the secondary Manor Farm site (17.69 acres) should be considered in conjunction with a more than two multi-site option.	The Council's approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013). The suggested sites are in area 'F' which was not progressed further due to significant landscape sensitivities and potential effects on heritage assets. ¹² In addition, the size of the sites is not sufficient to accommodate the minimum scale considered necessary for a strategic direction of growth (500 dwellings). ¹³ Recommendation: No change to PMM2, or Policy YV2 or YV6.

⁹ Para 3.26, Strategic Growth Options for Yeovil SA, October 2013.

¹⁰ Para 3.22 and table 4.1, Strategic Growth Options for Yeovil SA, October 2013.

¹¹ Figure 5, Yeovil Peripheral Landscape Study, 2008; Para 3.2, Peripheral Landscape study- Yeovil (Addendum), 2013.

¹² Para 3.26, Strategic Growth Options for Yeovil SA, October 2013.

¹³ Para 3.22, Strategic Growth Options for Yeovil SA, October 2013.

	Develop at Cartgate link road adjacent to Lufton where there is easy access to the A3088, A303 and A30.	Area 'F', which is adjacent to Lufton, was not progressed further due to the SA and other work highlighting significant landscape sensitivities and potential effects on heritage assets. ¹⁴ Recommendation: No change to PMM2, or Policy YV2 or YV6.
	A truly multi-site approach should be proposed – issues with less than 500 dwellings can be mitigated through the use of CIL, as evidenced in the PMB30 item 11 report. SHLAA sites should be properly considered and a “neck lacing” approach adopted – suggest land at Gregg’s Riding School.	The Council’s approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013). The potential future use of CIL to provide/enhance community facilities and services is noted, but 500 dwellings has been considered the minimum necessary to consider a strategic growth option, ¹⁵ and the suggested land does not have the capacity to deliver this. ¹⁶ This is consistent with the NPPF through greater potential to promote mixed-use developments, minimise travel and promote sustainable travel (para 17, 34, 37, 38, 69). The SHLAA was considered as evidence to inform the availability/deliverability of land. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	No need to develop land at Keyford now that land to the north east has come forward.	Evidence on housing deliverability, site viability, and a fresh SA indicates that an SUE to the south remains a sustainable approach to delivering development. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Lack of consideration of multi-site approach when local villages could accommodate housing need spread between them. Multi option sites would not need new facilities as these could use existing facilities which would improve their viability, and would also give local builders a fairer share of building work.	Yeovil is the key centre for employment, services and facilities in South Somerset, so is rightly the focus for new development to build upon its existing role and function. The strategy for the distribution of growth is considered appropriate and has not been raised in the Inspector’s Preliminary Findings. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Development should be spread across four sites rather than two to reduce the impact of each one.	Although some site specific impacts for smaller sites may be less (e.g. less localised traffic impact, although the town-wide impact is likely to be similar wherever growth is located), the strategy of seeking to focus larger scale development is more consistent with the NPPF as it offers greater potential to promote mixed-use developments, minimise travel and promote sustainable

¹⁴ Para 3.26, Strategic Growth Options for Yeovil SA, October 2013.

¹⁵ Para 3.22, Strategic Growth Options for Yeovil SA, October 2013.

¹⁶ SHLAA 2013 indicates the land has potential for around 180 dwellings.

		travel (para 17, 34, 37, 38, 69). 500 dwellings has been considered the minimum necessary (see above), and four sites of this scale is greater than the requirement (1,565 dwellings) in an urban extension(s). Recommendation: No change to PMM2, or Policy YV2 or YV6.
11	Overall approach	
	The Inspector's preliminary findings does not state the SUE should not be built to the south, did not disagree with the proposal for a single location, did not suggest that 2,500 dwellings is incorrect, and did not suggest that the urban extension should be split into two locations – para 69 (“the broad principle of a sustainable urban extension is sound”) is particularly relevant.	The Council's approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013). 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. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	The Inspector's preliminary findings (para 67) implies that a change to a multi-site approach equates to “an entirely different strategy”, which means that other factors have to be considered in addition to the four major concerns raised by the Inspector.	See above Recommendation: No change to PMM2, or Policy YV2 or YV6.
	A genuine re-assessment has not been undertaken as the Council have simply reassessed four sites already considered without including alternative sites as part of a multi-site approach.	Disagree – a fresh and independent SA of strategic growth options for Yeovil has been prepared. ¹⁷ Recommendation: No change to PMM2, or Policy YV2 or YV6.
	There is a lack of adequate justification for reducing the housing numbers from 2,500 to 1,565 dwellings, and the change from a single site to a multi-site.	The Council's approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013). The PMM consultation document (chapter 2) explains why 1,565 dwellings is now being used, and the proposal for two directions of growth, rather than a single one. This is supported by evidence in the SA. ¹⁸

¹⁷ Para 1.7-9, para 3.15, Strategic Growth Options for Yeovil SA, October 2013.

¹⁸ Chapter 4, Strategic Growth Options for Yeovil SA, October 2013.

		Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Support two directions of growth and assessment based on growth in the plan period, but the longer term development potential of the south will need to be identified in the next plan period.	Noted – this will be decision for a subsequent Local Plan. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Disagree with the removal of 935 dwellings beyond the plan period as this provided greater flexibility for housing delivery if homes were being delivered faster than envisaged. Without this flexibility there is more uncertainty and more potential for further under delivery.	The Council’s approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013). To ensure that the Local Plan conforms to the NPPF, it must be “effective”. On this basis it must be deliverable over its plan period. As such it is appropriate that the SUEs only focus on delivering the necessary housing requirement for Yeovil in the plan period. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	The consultants’ state there is potential for the Coker site to expand further – the evidence for this has been deemed unsound.	See above Recommendation: No change to PMM2, or Policy YV2 or YV6.
	The housing numbers in the Bunford Heights permission was part of the original direction of growth, so should be taken off and the overall number for the urban extension(s) reduced accordingly.	Noted. The SUE has been amended to exclude ‘Bunford Heights’, as such, the delivery of housing at the site should be considered part of the ‘urban framework’. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Support a single site and can create a more sustainable community with facilities, public transport and infrastructure. Several small developments will mean less money from contributions.	The Council’s approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013). It is advocated that the two SUEs allow for a more comprehensive approach to supporting existing and/or delivering new infrastructure, based upon a more holistic approach to infrastructure provision across the whole of Yeovil. This would be in addition to the site specific mitigation necessary for each site to ensure it mitigates its impacts. For example, the Inspector in his Preliminary Findings (para 25) highlighted that in considering potential growth options and the impacts on public transport <i>“there is no reason to suppose that existing services elsewhere in the town could not be improved to accommodate demand from an urban extension.”</i> Recommendation: No change to PMM2, or Policy YV2 or YV6.

	Wish to continue cooperative working with the Council on the proposals, in particular regarding infrastructure requirements and mitigation of impacts through masterplanning.	Noted – A series of meetings have taken place with West Dorset District Council and SSDC as the emerging Local Plan has developed. This will continue, as will constructive dialogue on common issues, as part of the Duty to Co-operate. Recommendation: No change to PMM2, or Policy YV2 or YV6.
12	Other issues	
	Object because the consultation process is vague.	Disagree. The consultation process was widely advertised including on the District Council's web site, through a press release and notices were placed in local newspapers. A number of informal 'drop-in sessions' attended by District Council officers were held as well as ad hoc meetings with town and parish councils as requested. Those on the Local Plan data base, which consists of over 2,000 contacts including individuals, statutory bodies, businesses, local organisations and interest groups were sent a direct letter or email notifying them of the consultation. The notification included details of the consultation period, what the consultation was about, where the documents could be seen, how comments could be made and where and when the 'drop-in' sessions were. The notification also included the fact that comments could be accompanied by a request for notification of the submission of the local plan for examination, the publication of the recommendations of the Inspector and the adoption of the local plan. Recommendation: No change to PMM2, or Policy YV2 or YV6.
	It is unlikely that the urban extensions will be developed to the highest sustainability objectives and garden city principles as this is subject to viability and based on past performance on upholding S.106 conditions. All development should be designed to a high standard and to Passivehaus in order to be carbon neutral.	Emerging Local Plan Policy EQ1: Addressing Climate Change in South Somerset seeks to achieve sustainable construction and minimise carbon dioxide emissions in new development. This along with the changes being made to the Building Regulations will mean that high levels of sustainability can be achieved. Emerging Local Plan Policy YV2 states that, "The Yeovil Sustainable Urban Extensions will be developed to the highest sustainability objectives and garden city principles, subject to viability..." Recommendation: No change to PMM2, or Policy YV2 or YV6.
	Amend Inset Map 15 by deleting the previously proposed Direction of Growth (striped red).	Inset Map 15 has been presented as it has in the Proposed Main Modifications Consultation Document, November 2013 - by including the area in the Submitted Local Plan, June 2012 as well as the proposed revised Directions of Growth in order to make it clear how the proposed urban extension is proposed to be amended. The final version on Inset Map 15 will only include the adopted Directions for Growth and not the areas previously proposed.

		Recommendation: No change to PMM2, or Policy YV2 or YV6
	The work carried out by SSDC is not truly independent because of the brief that was given to Enfusion. SSDC have not met the undertaking that they gave to the Planning Inspector in response to his letter on the unsoundness of the original plan.	Enfusion have carried out a full and independent sustainability appraisal of the options for growth around Yeovil. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Proposals map for Yeovil does not have a full key therefore judgement cannot be passed.	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. Recommendation: Recommendation: No change to PMM2, or Policy YV2 or YV6 Amend the Proposed Main Modifications Document when it is submitted to the Inspector to include the full map key.
	Satisfied that the changes to the Local Plan do not pose any additional risk to the natural environment. Welcome the clarification that the requirement to masterplan the urban extensions to Yeovil and include 40% open space is being retained (2.12).	Noted. Recommendation: No change to PMM2, or Policy YV2 or YV6
	All greenfield development should be at a minimum density of 40 dph to reduce loss of agricultural land.	This is not a matter addressed by the proposed Main Modifications. It is considered that housing density is adequately addressed in the emerging Local Plan where all development is expected to ensure the most efficient use of land whilst having regard to factors such as local character, demand and need for housing (emerging Policy EQ2: General Development). The matter is discussed in South Somerset District Council's response to the Inspector's Examination Issue 4, Question 4.4. Recommendation: No change to PMM2, or Policy YV2 or YV6
	Densely populated housing development will create social cohesion problems.	See response above. Recommendation: No change to PMM2, or Policy YV2 or YV6
13	Buffer zone (Policy YV3)	
	The southern option is a considerable distance from East Coker and provides buffer zones etc to protect	Agree – the reduced scale of the direction of growth means that the justification for the buffer zone (prevent coalescence with Yeovil and preserve the historic

	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.	assets at North/East Coker) no longer applies. Recommendation: Consider deletion of Policy YV3 and make consequential amendment to the Policies Map.
	No justification for the Buffer Zone as it conflicts with the NPPF (para 77) – therefore delete policy YV3 and amend proposals map.	See above. Recommendation: Consider deletion of Policy YV3 and make consequential amendment to the Policies Map.
	Amend policy YV3 and supporting text to reflect the changes now proposed and more effectively prevent the coalescence of Yeovil with North/East Coker, protect the setting of historic assets and reflect its status as green infrastructure (NPPF, para 114, 126-129, 157). The buffer zone should be extended eastwards to the edge of the PMM.	The reduced scale of the direction of growth means that the justification for the buffer zone may no longer apply. There would appear to be no evidence to suggest extending the buffer zone. Recommendation: Consider deletion of Policy YV3 and make consequential amendment to the Policies Map.

Upper Mudford		
Issue		SSDC Response
1	Agricultural land quality	
	Building on grade 2 and 3 agricultural land in a well-established farming area will lead to a loss of farming jobs and tradition, contrary to the Local Plan 'vision'.	Noted. Building on agricultural land around Yeovil is necessary to meet the development requirements identified in the plan. Local authorities should take into account the economic and other benefits of the best and most versatile land, and should seek to use areas of poorer quality land in preference to that of a higher quality (NPPF, para 112). The Governments' National Policy Statements ¹⁹ define "poorer quality" agricultural land as grades 3b, 4 and 5. Recommendation: No change to Policy YV1, YV2 or SS5
2	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 designated as a 'Special Landscape Feature'. The high sensitivity is stated in the landscape addendum sections 5D.2, 5D.3.	Whilst it is accepted that there will be landscape impact, the Landscape Addendum: Yeovil Peripheral Landscape Study (August 2013) identifies that there is capacity for mitigation (LA 5D.7 & 5D.8). It should be noted that there is no Special Landscape Feature designation within the current SSDC local plan; however sensitive site planning can design in lines of view toward the Dorset and East Somerset Hills. Recommendation: No change to Policy YV1, YV2 or SS5
	The so called natural boundaries do not fully contain the site and breaking the northern ridge would open the flood gates for development along the rest of the northern ridge.	'Natural boundaries' have the capacity to define site extent, whilst containment can be achieved by careful planning of site arrangement, and landscape mitigation. Breaking over the northern ridge can be contained to large degree by keeping development to the east of the A359 (LA 5D3 & 5D7). Recommendation: No change to Policy YV1, YV2 or SS5
	The 2003 Local Plan Inspector stated that this site was "visually very prominent", the skyline to the north of Yeovil should not be breached without "very strong grounds" and in the "absence of any compelling, strategic reasons" – there is no evidence for these grounds.	It is accepted that the site has local prominence to its northeast side. However, the Peripheral Landscape Study (PLS, Fig.5) and the LA (Para 5D.8) note that there is capacity for development, and this information has been factored into the Sustainability Appraisal of options and the overall decision making process. Recommendation: No change to Policy YV1, YV2 or SS5
	The Inspector's preliminary findings on landscape are at variance with the 2003 Inspector. Just because Wyndham Park has breached the skyline does not	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

¹⁹ Overarching NPS for Energy, DECC, July 2011; Hazardous Waste NPS, DEFRA, June 2013; draft NPS for National Networks, December 2013.

	justify further breaching at Upper Mudford. The Inspector has given excessive weight to the Council's 2003 landscape report at Keyford, and not the 2003 Inspector's conclusions on Primrose Lane.	considered anew. This is assisted by both the Yeovil PLS and LA. These documents provide the first thorough assessment of the capacity of the town's edge to accommodate development. As noted previously, breaching the Upper Mudford skyline can be avoided by careful site planning, and landscape mitigation (LA 5D.3 & 5D.7). Recommendation: No change to Policy YV1, YV2 or SS5
	Essential that there is appropriate mitigation for visual impact. Add reference to policy YV2 regarding the need for significant investment in Green Infrastructure in Upper Mudford site to mitigate development impacts.	Agree that appropriate landscape mitigation is an essential component of any development to the North-East of Yeovil (see LA 5D.7). Recommendation: No change to Policy YV1, YV2 or SS5
	There will be a loss of the buffer zone between Mudford and Trent and Yeovil, meaning that the villages will lose their identity and character.	No 'buffer zone' as such is designated, but open farmland intervenes between Yeovil and these peripheral settlements. Whilst the extent of open land will reduce, a buffer can be consolidated by carefully planned landscape mitigation (LA 5D.7). Recommendation: No change to Policy YV1, YV2 or SS5
	Much of Dorset is AONB and developments of this size and type should not be visible from an AONB.	This site cannot be viewed from the Dorset AONB. Views toward the site from the adjacent Dorset Hills will see the site against the backdrop of Yeovil. Recommendation: No change to Policy YV1, YV2 or SS5
3	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.	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 archaeology ²⁰ . 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. Recommendation: No change to Policy YV1, YV2 or SS5
	Development on this side of Yeovil would destroy an historic landscape of national importance.	The Historic Environment Assessment shows the area as having high historic landscape sensitivity, as a result of the presence of anciently enclosed fields, but concludes there is a 'moderate' capacity for development. It is considered that any adverse impacts can be suitably mitigated through landscaping and

²⁰ Historic Environment Assessment of Yeovil Periphery, July 2010; Archaeological Issues, Somerset CC, January 2014.

		the 40% green space provision. Recommendation: No change to Policy YV1, YV2 or SS5
	It is very likely that the buried archaeological remains found at Wyndham Park will continue into the direction of growth area. The site should be fully archaeologically assessed as part of a masterplan stage and the results used to inform mitigation - must take place before any planning applications/ masterplans being determined. Application should include detailed archaeological mitigation strategy. Community engagement programmes should accompany archaeological investigations where appropriate.	Noted. An archaeological assessment is also a key recommendation in the Yeovil Strategic Growth Options SA report. Further discussions with SCC (14.02.14) confirm that impacts on historic environment can be mitigated and that the inter-relationship between Upper Mudford and the 'shrunk medieval villages' is not of significance given the distance between the SUE and the area of archaeological interest. Recommendation: No change to Policy YV1, YV2 or SS5. Ensure supporting text outlines the archaeological issues and the requirement for archaeological assessment of any proposal.
5	Biodiversity	
	Families of deer that frequent the area will be lost.	Noted, but deer are not defined as a 'priority species' (S.41, NERC Act 2006) and therefore do not present a strong constraint against new development. Recommendation: No change to Policy YV1, YV2 or SS5
	There will a great loss of flora and fauna, including buzzards, hawks, foxes, otters, kingfishers, badgers and great crested newts.	Further site specific surveys and assessment would be required prior to the submission of a planning application. These assessments would ensure that suitable mitigation is provided. The intention for 40% of the development area to be green space will help to mitigate any impact. Recommendation: No change to Policy YV1, YV2 or SS5
	Historic hedgerows and trees should be preserved.	These features should be retained where possible, with further work to address these issues at the masterplanning stage. The intention for 40% of the development area to be green space will help to mitigate any impact. Recommendation: No change to Policy YV1, YV2 or SS5
6	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.	The Environment Agency ²¹ 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

²¹ Local Plan Proposed Main Modifications response, January 2014.

		<p>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>Recommendation: No change to Policy YV1, YV2 or SS5. South Somerset District Council to undertake a Flood Risk Management Strategy as part of the Site Allocations DPD / masterplanning process.</p>
	<p>There is little or no risk of flooding to any of the site options, but the potential impact of flooding downstream is an important consideration. Therefore, Sustainable Drainage Systems (SuDS) should be encouraged, and ground conditions are more favourable for water infiltration in the southern option than the Mudford option - the geology of the south is sandy soils and to the north it is clay subsoil/Lias beds. See Sherborne behind the seen, Joseph Fowler MA FGS, p 27 & 28.</p>	<p>See response above. Appendix B (Vol 1, Table B.2) of The South Somerset Strategic Flood Risk Assessment, 2008 [CD 70a] gives an indication of infiltration potential based on the underlying geological strata of the area and identifies Yeovil Sands as having good infiltration drainage potential. It does also identify that Oxford Caly/Kellaways beds are present "Very minor south of Yeovil. More extensive N-S band to extreme east". The Flood Risk Assessment [CD 70a] stresses the benefit of using infiltration as part of a SuDS system.</p> <p>Recommendation: No change to Policy YV1, YV2 or SS5</p>
	<p>Run off water from the Coker option does not flow into areas subject to flood warnings whereas the north of Yeovil flows into the already threatened Somerset Levels.</p>	<p>See responses above.</p> <p>Recommendation: No change to Policy YV1, YV2 or SS5</p>
	<p>The area north of Primrose Lane is floodplain.</p>	<p>The South Somerset Strategic Flood Risk Assessment, 2008 [CD 70] does not identify land within the Upper Mudford proposed Direction of Growth as being in a flood plain. Nor is it identified as being so on the Environment Agency web site (29.01.14).</p> <p>Recommendation: No change to Policy YV1, YV2 or SS5</p>
	<p>Developer suggested that a catchment lake or underground tank could be built to deal with the very obvious water run off problem.</p>	<p>Noted. Engineering solutions to surface water runoff will be explored as part of the Flood Risk Management Strategy to be produced when undertaking the Site Allocations DPD / masterplanning process. It will be up to the developer to fund an appropriate solution to surface water runoff issues in agreement</p>

		with the Environment Agency and District Council. Recommendation: No change to Policy YV1, YV2 or SS5
	<p>During wet summer of 2012 land proposed for development became saturated resulting in run-off down Primrose Lane into low lying farmland. Development here will reduce the surface land available to absorb rainwater. Run-off can only be drained into River Yeo at Mudford - already prone to flooding and consequent disruption on the A359. Recent flooding led to wide spread local disruption. Part of the land proposed for development is currently under water - extensive flooding Christmas and New Year 2013/2014. Dutch are now practicing 'Flood Avoidance' - not allowing development in high-risk areas. Reference to Pitt Report, 2007. First time in 47 years that properties in Mudford and Ilchester flooded.</p>	<p>Noted. See responses above.</p> <p>N.B. Learning the Lessons from the 2007 Floods (Sir Michael Pitt, June 2008) sets out a number of recommendations to Government calling for urgent and fundamental changes in the way the country adapts to the likelihood of more frequent and intense periods of heavy rainfall.</p> <p>Recommendation: No change to Policy YV1, YV2 or SS5</p>
	<p>There used to be a Water Pumping Station at the top of Primrose Lane, also used to be a windmill near the top of Long Hill on the A359 and a water tower behind High Lea, Yeovil. There is a sewage works at Wangle Wood on the escarpment which is accessed from Stone Lane - given the past (and existing) presence of these buildings where did the pumping station draw its water? From tanks. Is there an underground stream nearby that flows from further up the escarpment towards Hundredstone? - believe there used to be a stream at Coombe Bottom all this together with other evidence submitted suggests that the water table is high in the ground surface and is very wide spread in its natural flow. If the water were be diverted could this cause flooding in areas that were not previously flooded?</p>	<p>The District Council's Engineer has been consulted and has responded as follows: <i>"Reference to the 1930 OS maps does show 3 windmills/pumps in this area and some associated tanks/reservoirs. I'm not sure if there was any actual water extraction at these locations and even if there was the depth of the boreholes down to the aquifers could have been anything. The water tower at High Lea as I recall was basically a storage reservoir to which water was pumped from elsewhere (Sutton Bingham maybe) but again I don't have any details. The sewage works near Stone Lane was built in the mid 1960's I believe when main sewers were installed at Mudford and at parts of Combe Street Lane and Stone Lane. Houses at Primrose Lane also drain to this sewage works and not the main sewage works at Pen Mill which I have heard said. The Great Lyde and Wyndham park sites do drain to the Penn Mill works. A watercourse exists at Coombe Bottom although this may have been partially piped to accommodate the land-fill that took place in this area. The route of this watercourse passes through Up Mudford and connects to the R Yeo. This watercourse would be the natural receptor for surface water drainage from the suggested key site here but would require some investigation as to its capacity. I'm not aware of particularly high water tables at this location but would be willing to be guided by local knowledge in this</i></p>

		<p><i>respect – recent/on-going developments at Primrose Lane would no doubt give useful information.”</i></p> <p>It is of note that the Environment Agency have not raised any concerns about this issue. It will be for a detailed drainage assessment and mitigation strategy to be developed for the site, as and when a planning application is forthcoming. It is expected that both the Environment Agency and Wessex Water would be an integral part of any detailed drainage assessments.</p> <p>Recommendation: No change to Policy YV1, YV2 or SS5</p>
	Flooding issues may render the site unviable.	<p>As identified above further work needs to be carried out as part of the Site Allocations DPD / masterplanning to establish what measures need to be put in place to address flood mitigation on the Upper Mudford site. The updated this will include costs.</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>Recommendation: No change to Policy YV1, YV2 or SS5</p>
	No impact assessment has been undertaken on the potential surface water run-off and any potential flooding issues that will arise from development.	<p>The Strategic Flood Risk Assessment [CD70] includes some detail on surface water flooding, sufficient to inform the directions of growth. Further work will be required as part of the Site Allocations DPD and planning application process.</p> <p>Recommendation: No change to Policy YV1, YV2 or SS5</p>
7	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>Noted. Additional traffic modelling work has been prepared²² which details the traffic impact of various growth options. This evidence shows congestion at the Mudford Road/Combe Street Lane junction increasing by 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). No other significant results are highlighted.</p> <p>Recommendation: No change to Policy YV1, YV2, YV6 or SS5</p>

²² Yeovil SUE – traffic modelling Non-technical forecasting addendum report 3, February 2014.

	The north east site has potential for greater impact on the A303 junctions north of Yeovil including Hazelgrove roundabout.	The latest traffic modelling ²³ shows very limited impact on Cartgate roundabout junction operation from the development options, although the reference case shows it is forecast to be over capacity in AM and PM peaks. Although Hazelgrove roundabout is outside of the modelling area, there is negligible difference on traffic flows along the A359 Mudford Hill resulting from the Upper Mudford direction of growth compared with the reference case. Recommendation: No change to Policy YV1, YV2, YV6 or SS5
	Safe and suitable access can be achieved in the north east site, and the existing Parsons Brinckerhoff transport assessments demonstrate that development would have similar traffic impact wherever located.	Noted. The latest traffic modelling work again shows little difference on traffic impact between the various options. Recommendation: No change to Policy YV1, YV2, YV6 or SS5
	A new roundabout would be required on Mudford Road to access the site.	Noted – the access to the site will be considered at the masterplanning stage as part of the Site Allocations DPD, or a planning application. The additional modelling work referred to above shows the traffic impact of the direction of growth. Recommendation: No change to Policy YV1, YV2, YV6 or SS5
	Traffic surveys in 2013 along the A359 demonstrated that the 30mph speed limit was not being adhered to.	Noted. Any new development will be required to have a safe and suitable access. Recommendation: No change to Policy YV1, YV2, YV6 or SS5
	Wyndham Park developer was supposed to deliver a roundabout at the Lyde Road/Mudford Road junction but this has not happened.	The latest agreement is for the developer to deliver a traffic-lighted right-hand turn junction from Mudford Road to Lyde Road, which is due to be delivered on completion of the 500 th dwelling at Wyndham Park. Recommendation: No change to Policy YV1, YV2, YV6 or SS5
	There is a lack of evidence regarding current and predicted traffic volumes across the north of Yeovil.	See above – additional traffic modelling work has been carried out, which provides a robust evidence base on this issue. Recommendation: No change to Policy YV1, YV2, YV6 or SS5
8	Sustainable travel potential	
	There is a potential detrimental impact on public footpaths in the area e.g. Droveaway Lane (part of the national footpath).	There are no public footpaths within or adjacent to the north east direction of growth. Even so, any proposals would need to comply with the NPPF (para 75) which states that public rights of way and access should be protected and enhanced, and policy HW1 in the emerging Local Plan. Recommendation: No change to Policy YV1, YV2, YV6 or SS5

²³ Yeovil SUE – traffic modelling Non-technical forecasting addendum report 3, February 2014.

	North east Yeovil has almost non-existent public transport and no pavements or cycle routes.	There are three existing bus routes that run near to the north east direction of growth, along the A359 and Lyde Road. ²⁴ It is acknowledged that there is a lack of existing cycle routes in north east Yeovil [CD153], but these should be sought in new development as set out in policy YV6. Recommendation: No change to Policy YV1, YV2, YV6 or SS5
	Section 106 agreed bus services have not been delivered at Wyndham Park site - the County Council should receive £375,000 from the developer. Little chance that a bus service could be guaranteed for the Primrose Lane site. If 1,565 new homes were located to the south of Yeovil a new bus service would be more viable.	There are three existing bus routes that run near to the north east direction of growth, along the A359 and Lyde Road, ²⁵ and development offers the potential to enhance these services. Discussions with the Highways Authority are on-going to ensure that future public transport requirements associated with the SUEs and growth within Yeovil is aligned with existing service provision so that bus routes and public transport can be enhanced, not over-burdened. Recommendation: No change to Policy YV1, YV2, YV6 or SS5
9	Social infrastructure	
	Recent escape of raw sewage due to the small pumping station by Mudford church being regularly flooded. Infill at Primrose Lane has led to frequent sewage overflows. A substantial and costly new sewerage system would be required through either a massive pumping station or a new sewage farm. An in-depth independent study of sewage and dirty water options needs to be completed by the Council with Wessex Water and the EA	Noted. Wessex Water in their response to the Consultation on the Proposed Main Modifications, November 2013 notes the revised area of growth at Yeovil. They comment that at this stage they have not completed any detailed site assessments, however they wish to be fully engaged during the preparation of the Site Allocations DPD and the masterplanning process. A detailed engineering appraisal will confirm satisfactory points of connection for water supply and waste water services. Capacity improvements will need to be determined through network modelling to confirm, the scope and extent work that may be required downstream. Recommendation: No change to Policy YV1, YV2, or SS5
	Splitting into two sites will make it difficult to secure the required infrastructure as critical mass will be lost e.g. less opportunity to support bus services. Makes the plan less viable and sustainable. Will just result in a large housing estates and the 'vision' will be lost. North of Yeovil already over developed and poorly served by infrastructure. Important that parish councils are involved in the outline planning approval, S106	Noted. It is advocated that the two SUEs allow for a more comprehensive approach to supporting existing and/or delivering new infrastructure, based upon a more holistic approach to infrastructure provision across the whole of Yeovil. This would be in addition to the site specific mitigation necessary for each site to ensure it mitigates its impacts. The Inspector in his Preliminary Findings (para 25) highlighted that in considering potential growth options and the impacts on public transport "there is no reason to suppose that existing services elsewhere in the town

²⁴ SSDC Local Plan Examination Mid hearing document H023.

²⁵ SSDC Local Plan Examination Mid hearing document H023.

	Agreements and masterplanning.	could not be improved to accommodate demand from an urban extension.” Recommendation: No change to Policy YV1, YV2, YV6 or SS5
	Eastern Wards of Yeovil are considered to be amongst the 20% most deprived areas in England - will be exacerbated when the key Sites (Lyde, Brimsmore and Lufton) are completed - no guarantee that facilities will be delivered. No further housing should be sanctioned in the north unless there is a guarantee that all necessary infrastructure, communal facilities and services can be provided to serve the deprived areas of Yeovil.	There is no evidence to suggest that deprivation will be exacerbated when the key sites are completed – improved access to employment, housing, community facilities should benefit deprived wards. ²⁶ The proposed urban extensions should be built to the highest sustainability objectives, with a primary school, health centre and neighbourhood centre (policy YV2). Recommendation: No change to Policy YV1, YV2, or SS5
	A principal gas main dissects the Up Mudford site and no building works should take place within 150m of this gas line for safety reasons. Concerned that gas pollution emitting from Birchfield Landfill site could migrate up to the high pressure gas line.	Noted. The north east direction of growth abuts the consultation zone of a high pressure natural gas transmission pipeline (covered by ‘saved’ policy ME9 in the adopted Local Plan). The Health and Safety Executive & National Grid will advise through the planning application process. The ground gas from Birchfield will not migrate to the principle gas line as there is a natural topographical barrier (valley /river) and migration across these natural barriers over the distance involved is unlikely. Landfill gas from inside Birchfield generally permeates to the surface and then dissipates. Whilst SSDC measure gas nearby, the gas pressure at the edge of the site is insufficient for large scale migration over these natural features. The risk of domestic gas trenches being a conduit to the gas pipe line is limited as the gas line itself is high pressure and well protected. Recommendation: No change to Policy YV1, YV2, or SS5
	A single estate of 800 houses cannot make up the deficiencies of the Wyndham Park site and nor should it have to. Wyndham Park has no amenities (medical, retail, bus service).	The Upper Mudford direction of growth does offer the potential to provide facilities that could be used by surrounding areas, in order to mitigate the effects of the development. This would allow for a more comprehensive approach to supporting existing and/or delivering new infrastructure, based upon a more holistic approach to infrastructure provision across the whole of Yeovil. Recommendation: No change to Policy YV1, YV2, or SS5
	If development of Primrose Lane site goes ahead it is vitally important that a new medical facility is provided.	Policy YV2 does make provision for a health centre at the north east direction of growth.

²⁶ Appendix II (pg 19), Strategic Growth Options for Yeovil SA report, October 2013.

		Recommendation: No change to Policy YV1, YV2, or SS5
	Important that land is made available for other community facilities such as church, shops, post office, pub, police post, sports facilities etc.	Policy YV2 makes provision for supporting community infrastructure to support growth. Priorities for infrastructure delivery across Yeovil will be considered as part of Policy SS6. Recommendation: No change to Policy YV1, YV2, or SS5
	Necklace development only delivers housing and not infrastructure.	Noted. The Council's approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications. Recommendation: No change to Policy YV1, YV2, or SS5
10	Access to services/employment	
	Object as Upper Mudford is too far from the town centre.	The southern boundary is around 3km from the town centre. Appropriate sustainable transport solutions are proposed as part of Policy YV2 and YV6 to ensure that the SUE is well connected and integrated with the town and town centre. Detailed sustainable transport proposals will be forthcoming as part of the detailed masterplanning and planning application process. Recommendation: No change to Policy YV1, YV2, or SS5
11	General approach	
	Support proposal for a direction of growth at Upper Mudford, subject to proper assessment of all of the options.	Support noted. Recommendation: No change to Policy YV1, YV2, or SS5
	Northern parishes supported the original Local Plan where the SUE was located to the south.	Noted. The Council's approach to identifying two SUEs is set out alongside the revised SA of potential growth options. This is documented in the Strategic Growth Options for Yeovil - Suggested Approach by Enfusion as discussed at the PMB Workshop 30: Proposed Main Modifications. Recommendation: No change to Policy YV1, YV2, or SS5
	There is evidence that Anthrax spores were found on the site of Ken Rosewell's farm around 1960 with the resulting death of three cattle. Although recent investigations (January 2013) did not find Anthrax, soil samples were taken from a shallow depth and not from the burial site.	Noted. However, the investigations referenced did not find Anthrax on the site, but additional work may be required when the proposal is developed further e.g. through the Site Allocations DPD, or planning application process. To prevent unacceptable risks from pollution, new development should be appropriate for its location; and where a site is affected by contamination, responsibility for securing a safe development rests with the landowner/developer (para 120, NPPF). Recommendation: No change to Policy YV1, YV2, or SS5
	No consideration of the possible impact on the safety of	Defence Estates have not responded in consultation on the PMMs. However,

	RNAS Yeovilton by breaching the northern skyline.	at preferred options stage (October 2010) Defence Estates stated their principle concern relates to the need to constrain the height of developments within the statutory safeguarding areas surrounding Yeovil, Yeovilton and Merryfield airfields, and the Meteorological Office at Wardon Hill – the proposed urban extensions to Yeovil are within these safeguarding areas. Recommendation: No change to Policy YV1, YV2, or SS5. SSDC to work alongside Defence Estates to confirm position if and when a planning application Upper Mudford is forthcoming.
	Development at Upper Mudford will seriously undermine the well-being of its residents and nearby parishes – the vision the developer has is not the vision of the current residents.	The SA identifies a minor long term benefit to health through the provision of housing and employment; although there is a potential short-term negative effect on health during construction as waste, noise and dust pollution may be created, this can be mitigated. ²⁷ Recommendation: No change to Policy YV1, YV2, or SS5.
	Land near Upper Mudford includes a former landfill.	Noted, but this is not considered to have an impact on the land at Upper Mudford. Landfill gas from inside Birchfield generally permeates to the surface and then dissipates. Whilst SSDC measure gas nearby, the gas pressure at the edge of the site is insufficient for large scale migration over these natural features. Recommendation: No change to Policy YV1, YV2, or SS5.
	Proposed Main Modification has been adopted without consultation with the relevant parish councils (Mudford & Yeovil Without) nor with the residents most closely affected – northern Parishes strongly object.	Objection noted, but consultation has occurred via public drop-in sessions (two in Yeovil), and attendance by Planning Officers at the Area South parish meeting, a Mudford Parish Council meeting and a Yeovil Without Parish Council meeting. Recommendation: No change to Policy YV1, YV2, or SS5.
	Adverse effect on residential amenity - noise pollution, disturbance, crime, privacy, shadowing and view.	Noise pollution may be caused during construction, but measures can acceptably mitigate this. Policy EQ2 seeks to create safe and well designed development. The directions of growth should be developed to the highest sustainability objectives, subject to viability. Recommendation: No change to Policy YV1, YV2, or SS5.
	Since 1975, the north side of Yeovil has contributed around 7000 houses, whereas there have only been 25-35 houses built in East Coker meaning Yeovil has become lop-sided, so it is time for the south side of	It is too simple to assert that it is time for the south side to take their “share” of development. The growth of Yeovil over time has sought to avoid key constraints such as topography, sensitive landscapes, flood plain, and the historic environment, which has resulted in the town spreading mostly north

²⁷ Page 36, Appendix II, Strategic Growth Options for Yeovil SA, October 2013.

Yeovil to take their share of development and "round off" the town.	and westwards. The new Local Plan proposes development in areas with the fewest constraints, subject to other issues such as deliverability, including land to the south. Recommendation: No change to Policy YV1, YV2, or SS5.
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Coker		
Issue		SSDC Response
1	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 Statements²⁸ define “poorer quality” agricultural land as grades 3b, 4 and 5.</p> <p>The Council has sought to refine the SUE at Coker and the reduced scale of growth will reduce the impact on the loss of agricultural land. In assessing ‘reasonable alternatives’ as part of the SA process it has been necessary to factor in the impact of the loss of agricultural land, alongside other impacts and effects. 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). 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> <p>Recommendation: No change to Policy YV1, YV2, or SS5</p>
	Numerous smaller sites around Yeovil can be built without developing on grade 1 agricultural land.	The evidence base has shown that a large single site does not represent a sustainable option. Similarly the SA has shown that an extensive ‘multi-site’

²⁸ Overarching NPS for Energy, DECC, July 2011; Hazardous Waste NPS, DEFRA, June 2013; draft NPS for National Networks, December 2013.

		<p>option does not represent a sustainable option. Based upon the findings of the SA Report of Strategic Growth Options for Yeovil and the Council's own analysis of viability and deliverability – it has been shown that two SUEs can deliver the housing growth required and also achieve sustainable development principles and minimise impacts. The potential loss of the Best and Most Versatile Agricultural Land has been a key consideration in undertaking the SA of the options for growth. It is felt that a number of smaller sites would not necessarily reduce the scale of impact on agricultural land.</p> <p>Recommendation: No change to Policy YV1, YV2, or SS5</p>
	<p>The agricultural land in the Coker area is pasture land and not intensively farmed and is therefore not returning as much economic benefit as housing development. Grazing here has increased compaction and therefore reduced soil quality. UK agriculture is largely uncompetitive with imports. The Coker site lacks Agricultural Stewardship schemes and there is no Farm Environmental Plan.</p>	<p>The NPPF states that local authorities should seek to use areas of poorer quality land in preference to that of a higher quality (NPPF, para 112). Natural England's Agricultural Land Classification is used to determine the relative grading of the land. This information takes account of the long term physical limitations of land for agricultural use, including factors such as climate, site, and soil. In analysing these factors the classification is concerned with the inherent potential of land under a range of farming systems. The current agricultural use, or intensity of use, does not affect the grade. Physical limitations of the land are assessed through the range of crops which can be grown, the level of yield, the consistency of yield and the cost of obtain the crop.</p> <p>It is recognised that the land is grade 1 and the impact is factored into the SA of growth options. It is felt that the reduced scale of the SUE provides some mitigation to the loss of grade 1 agricultural land.</p> <p>Recommendation: No change to Policy YV1, YV2, or SS5</p>
2	Landscape impact	
	<p>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>	<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>

		Recommendation: No change to Policy YV1, YV2, or SS5
	Do not agree with the landscape addendum findings for areas A, B, and F, the exclusion of the northern escarpment for new development, and do not think the definitions of sensitivity in para 4.9 have been consistently applied.	Noted. The findings of the PLS and LA are considered robust and based upon a consistent application of an industry recognised landscape methodology. The findings from the PLS for Yeovil and the LA have been quality assurance checked by an independent landscape architect who is a chartered member of the Landscape Institute. Recommendation: No change to Policy YV1, YV2, or SS5
	The landscape addendum should have fully considered how to assimilate development into the townscape, and should have also considered agricultural land quality, historic environment, and biodiversity issues.	Noted. See answer above. The other issues identified are considered by the SA of potential growth options for Yeovil. Recommendation: No change to Policy YV1, YV2, or SS5
	The impact of development upon Montacute House has been overstated in the landscape addendum, compared to the Historic Environment Assessment, whilst the impact in the Coker area has been understated. Some views into the Coker option have been ignored.	Whilst it is recognised that there are some inter-relationships, it is important to recognise that the two assessments are different, and seek to understand different impacts on sensitive receptors. It is important not to combine or conflate landscape and historic environment impacts unless specifically seeking to do so through a cumulative impact assessment. It is not accepted that there is an imbalance in the findings associated with Montacute House and the Coker area. The LA has sought to identify the most sensitive viewpoints for all the study areas, at a level appropriate for a strategic study. Recommendation: No change to Policy YV1, YV2, or SS5
	The peripheral landscape study does not include the village of East Coker and does not take account of the larger setting of the urban extension in a rural landscape.	East Coker is included within the PLS (Figure 1 – study area) to enable potential impacts to be considered. Potential setting issues are assessed by the LA as far as is appropriate for a strategic document (LA 5B3 & 5B7), and practicable in the absence of a specific development proposal. Recommendation: No change to Policy YV1, YV2, or SS5
	The Coker site is flatter and can be contained within the landscape, and will have a limited visual and landscape impact when viewed from the A37 approaching from the south.	It is agreed that the Coker (i.e. Keyford) site poses fewer challenges relative to site levels, and with sensitive site planning and landscape mitigation, has the potential to be satisfactorily contained. Agreed that views from the A37 are limited, though this is not regarded as a sensitive receptor (LA 5B7). Recommendation: No change to Policy YV1, YV2, or SS5
	The landscape studies express concerns in the Mudford area, but not in the southern option. Suggest taking off the Bunford Heights approval and potential site behind Yeovil Court Hotel, leaving a figure of	Noted, it is acknowledged that the Peripheral Landscape Study (PLS) indicates land to the south as having a greater capacity for development ahead of land at Up Mudford (PLS, fig. 5). However, a single site option has been shown to not represent the most sustainable options having carried out

	around 1,400 dwellings which can be accommodated in the south.	a detailed and robust SA of options in Yeovil. Recommendation: No change to Policy YV1, YV2, or SS5
3	Historic Environment	
	Due weight not given to impact on historic assets in East Coker.	Disagree – 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. Recommendation: No change to Policy YV1, YV2, or SS5
	Little Tarratt Lane is part of the historically important Monarch's Way.	Noted – the Monarchs Way regional trail is noted as a sensitive receptor in the Landscape Addendum, which suggests enhancing this route as part of a Green Infrastructure framework for development proposals. This is consistent with NPPF (para 75) which states that public rights of way and access should be protected and enhanced, and policy HW1 in the Proposed Submission Local Plan. Recommendation: No change to Policy YV1, YV2, or SS5. Ensure evidence base explains that public rights of way across the location will be protected and enhanced.
	Potential impact on scheduled ancient monument at Dunnocks Lane is given insufficient importance. Roman artefacts have been discovered close to Chesells. Paving over heritage assets at East Coker that have been acknowledged by English Heritage shows a lack of regard. The survey produced by 'Stratascan' should be published.	Disagree – the Roman Villa is excluded from the SUE, and its setting is considered to have a high sensitivity ²⁹ . However, mitigation is possible to minimise adverse effects such as the area surrounding the villa being central to a large open space/landscaping scheme, and any proposal should be accompanied by an archaeological assessment. ³⁰ It should be noted that English Heritage's PMM response states their issues have been addressed, and supports the comments made by the County Archaeologist. The Council does not have access to the 'Stratascan' survey. Recommendation: No change to Policy YV1, YV2, or SS5 Ensure supporting text outlines the archaeological issues and the requirement for archaeological assessment of any proposal.
	Council should have commissioned a geophysical study of the Keyford Site to establish the nature and extent of the historical remains.	Disagree – evidence ³¹ has been prepared to inform consideration of archaeological issues, alongside correspondence with the Somerset's Senior Historic Environment Officer and English Heritage. As and when a planning application comes forward for development on the

²⁹ Historic Environment Assessment of Yeovil Periphery (July 2010).

³⁰ Archaeological Issues, Somerset CC, January 2014.

³¹ Historic Environment Assessment of Yeovil Periphery (July 2010).

		<p>site, it would be expected that it will be accompanied by an archaeological assessment, which would likely include a geophysical survey.</p> <p>Recommendation: No change to Policy YV1, YV2, or SS5</p>
	<p>East and North Coker have a large number of listed buildings and scheduled sites one of four villages in South Somerset listed as outstanding heritage settlement - 89 listed heritage assets including 3 Grade I and 4 Grade II* listed buildings.</p>	<p>Noted. The Historic Environment Assessment of Yeovil Periphery (July 2010) considers all historic assets and their sensitivity.</p> <p>Recommendation: No change to Policy YV1, YV2, or SS5</p>
	<p>Proposals will destroy a setting important to the nation and an inspiration to TS Eliot and consequent impact on tourism potential. Failed to recognise the international significance of the heritage of East Coker.</p>	<p>There is a lack of evidence on the tourism potential due to TS Eliot, and the impact of the direction of growth upon this. The Historic Environment Assessment of Yeovil Periphery (July 2010) considers all historic assets and their sensitivity.</p> <p>Recommendation: No change to Policy YV1, YV2, or SS5</p>
	<p>High potential for buried archaeological remains dating from prehistoric through to WWII. Proposal site is adjacent to Scheduled Monument Roman Villa north of Dunnocks Lane, which is sensitive to impact by development but due to its landscape setting appropriate mitigation can be applied. No development should take place in its immediate environs but landscaping and enhancement of the immediate setting could promote a positive use of the site. Site should be fully archaeologically assessed as part of a masterplan stage and the results used to inform mitigation. Community engagement programmes should accompany archaeological investigations where appropriate.</p>	<p>Noted. An archaeological assessment is also a key recommendation in the Yeovil Strategic Growth Options SA report. Welcome the recognition that appropriate mitigation can overcome significant impacts. Further discussion has taken place with Senior Historic Environment Officer at Somerset County Council with agreement that mitigation can be delivered to manage significant effects on sensitive receptors.</p> <p>Recommendation: No change to Policy YV1, YV2, or SS5. Ensure supporting text outlines the archaeological issues and the requirement for archaeological assessment of any proposal.</p>
4	Biodiversity	
	<p>Object to Coker direction of growth due to the loss of wildlife species.</p>	<p>There are no statutory or non-statutory wildlife designations within or adjacent to the Coker direction of growth. Evidence [CD65, 72] indicates that bats (European Protected Species) are present in the area, but because the Coker direction of growth is predominantly arable, it is likely to be of limited foraging potential. A UK Biodiversity Action Plan species of fungus (Sandy Stilt Puffball) has been recorded in the past in the vicinity of Red House. Mitigation is possible through requiring further surveys and retaining key</p>

		features, along with the proposal for 40% of the area to be green space. Recommendation: No change to Policy YV1, YV2, or SS5.
	There is a lack of consistency regarding biodiversity and geodiversity.	Disagree – the Strategic Growth Options for Yeovil SA provides a consistent basis on this issue on which to make an informed decision. Recommendation: No change to Policy YV1, YV2, or SS5.
5	Flood risk	
	Development will increase the likelihood of flooding, particularly at North and East Coker, Barwick and Stoford and A37 areas. Scale of development will have an impact on natural drainage - significant flood zone to the south of site. Flood mitigation measures have not been fully considered.	The Environment Agency ³² identify that further work will be required within the masterplanning stages to more accurately map any local flooding issues. At that time they suggest undertaking a flood risk management strategy (FRMS) to include surface water within the strategic allocation to prevent increasing flood risk to the downstream catchment. They consider that there will be an engineering solution to surface water runoff. Paragraph 4.17 of The Report on Infrastructure Planning in South Somerset, January 2012 [CD 36] identifies that funding and delivery flood mitigation will be through the developer, taken into account development viability assessments. Recommendation: Recommendation: No change to Policy YV1, YV2, or SS5. South Somerset District Council to undertake a Flood Risk Management Strategy as part of the Site Allocations DPD / masterplanning process.
	Development would be on a floodplain.	The South Somerset Strategic Flood Risk Assessment, 2008 [CD 70] does not identify land within the Coker proposed Direction of Growth as being in a flood plain. Nor is it identified as being so on the Environment Agency flood mapping data. Recommendation: No change to Policy YV1, YV2, or SS5.
6	Highways/traffic	
	Object due to increased traffic in an area where the	Noted. Traffic modelling shows little difference between the various options

³² Response to Local Plan Proposed Main Modifications, January 2014.

	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.	for an urban extension, with background traffic growth being the major contributor to deterioration of highway network performance. The modelling shows: ³³ 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 Coker Road. More detailed work on proposals to address traffic issues will be considered in the emerging Yeovil Transport Strategy Review 2, in the forthcoming Site Allocations DPD, and as and when any planning applications come forward. Recommendation: No change to Policy YV1, YV2, or SS5.
	Congestion on the A37 will result in “rat runs” through villages which will increase the risk of accidents.	Noted. See answer above. Recommendation: No change to Policy YV1, YV2, or SS5.
	The Coker site is far from the important economic growth proposals to dual the A303/358 and M5 junction improvements (Somerset Growth Plan), encouraging more travel across town.	Noted, but the Highways Agency state that new development should not have a severe impact on the strategic route network, and previously supported a southern urban extension as it is further from the A303. ³⁴ Further discussions with the Highways Authority and the Highways Agency have not highlighted any significant issues on the local or strategic highway network. It will be expected that any planning application would have to demonstrate that they are mitigate the impact on the highway network in line with Local Plan policies. Recommendation: No change to Policy YV1, YV2, or SS5.
	Development should be in the Coker option as it is closer to main roads (A30, A37) and employment areas, and it already has a purpose built roundabout.	Noted. The PMM does propose a SUE in the Coker option. Recommendation: No change to Policy YV1, YV2, or SS5.
	The idea that employment will be provided on site and therefore highway improvements will not be needed has been discredited at the Examination.	Do not dispute the fact that, although employment will be provided “on site”, necessary highways improvements will be required. This will be informed by the latest traffic modelling, the emerging Yeovil Transport Strategy Review 2 further work at the masterplanning/Site Allocations DPD stage. Recommendation: No change to Policy YV1, YV2, or SS5.
7	Sustainable travel potential	
	The proximity to Yeovil Junction is a “red-herring” as residents of the proposed new development would not	Noted. The southern option is closer to Yeovil Junction, although this relative proximity is not mentioned as a significant factor in SA, as some travel is still

³³ Yeovil SUE – traffic modelling Non-technical forecasting addendum report 3, February 2014.

³⁴ Highways Agency Proposed Submission LP response, August 2012.

	likely use the train regularly.	required to reach the station. As the Inspector states (para 25), there is no evidence to suggest that bus links to Yeovil Junction station could not be provided from areas other than to the south of the town. Recommendation: No change to Policy YV1, YV2, or SS5.
	Development in the Coker option provides an opportunity to improve the rail service. Car journeys can only be reduced through properly pre-planned developments, such as previously proposed in a single urban extension to the south.	See above response regarding proximity to Yeovil Junction. It is acknowledged that a lower scale of development and accompanying on-site facilities/ services is likely to reduce the potential for non-car travel, however requirements for sustainable travel can and will remain. Recommendation: No change to Policy YV1, YV2, or SS5.
	People will not walk or cycle due to the steep topography from Keyford (Forest Hill and Hendford Hill); Lovers Lane is not suitable and access through Yeovil Country Park is not realistic.	The Yeovil SA acknowledges that the topography into the town centre is steep, but improvements to walking and cycling routes will be delivered alongside new development (Policy YV6). Recommendation: No change to Policy YV1, YV2, or SS5.
	There are already bus routes through the southern option which are capable of enhancement, and good cycling and walking links to Yeovil and beyond.	Noted. The existing walking, cycling and bus links ³⁵ in the southern SUE option are noted, and new development will be expected to integrate and enhance facilities. Recommendation: No change to Policy YV1, YV2, or SS5.
8	Social infrastructure	
	Lack of infrastructure capacity, schools, Yeovil Hospital, Health Centre, sewage works and water supply.	PMM2 includes provision for a health centre in the southern SUE (Coker) together with a Primary School and a neighbourhood centre. Wessex Water ³⁶ note the revised area of growth at Yeovil. They comment that at this stage they have not completed any detailed site assessments, however they wish to be fully engaged during the preparation of the Site Allocations DPD and the masterplanning process. A detailed engineering appraisal will confirm satisfactory points of connection for water supply and waste water services. Capacity improvements will need to be determined through network modelling to confirm, the scope and extent work that may be required downstream. Recommendation: No change to Policy YV1, YV2, or SS5.
	The Keyford site, due to its topography, would require at least 4-5,000 feet of properly surfaced lit pathways	Noted. Links from the urban extension will be considered through the Site Allocations DPD and future masterplanning processes.

³⁵ SSDC Local Plan Examination Mid hearing document H023.

³⁶ Response to Local Plan Proposed Main Modifications, January 2014.

	through Yeovil Country Park to meet the requirements of BS8300 on recommended gradients as applied through the Equality Act, to meet access for all including those with mobility disability.	Recommendation: No change to Policy YV1, YV2, or SS5.
	Support the proposal for an urban extension to the south, but YV2 should just state "south" rather than "south and west" and YV6 should state "neighbourhood centre" rather than "shopping centre"; a Development Framework statement has been prepared in support of the Keyford site.	Agree that "south" is a more appropriate description for the reduced area in Coker; and policy YV6 should state "neighbourhood centre" to be consistent with policy EP14. Recommendation: Amend Policy YV2 to state "south" rather than "south and west"; amend policy YV6 to state "neighbourhood centre" rather than "shopping centre".
	Council will not pay for a medical centre on the site.	Medical and health centres are generally delivered through private trusts, via Somerset County Council and other NHS-linked enterprises. Policy YV2 outlines the expectation that a health centre will be delivered and it will be expected that a development on-site will plan for its delivery. Details will be worked up through appropriate masterplanning work and the Site Allocations DPD. Recommendation: No change to Policy YV1, YV2, or SS5.
	Creation of 'estates' will increase fragmentation and new local shopping precincts will take business from the Town Centre.	Local shopping in the neighbourhood centre will serve the local needs of residents in the urban extensions, and will not compete with the town centre (policy YV2, and EP14). Strong public transport, walking and cycling links to the town centre will also support the viability of existing retail units. Recommendation: No change to Policy YV1, YV2, or SS5.
	The new school in the SUE threatens the viability of East Coker Primary school - conflict with the NPPF. East Coker school has a large intake from outside the catchment area and is not full. East Coker and Barwick Schools should be utilised to capacity first.	A new primary school in the SUEs is consistent with the NPPF (e.g. para 38, 69). Pupil numbers at East Coker Primary School currently exceed capacity and are forecast to continue to do so in 2017; Barwick and Stoford is currently 10 pupils below capacity and forecast to be 15 pupils under capacity in 2017. ³⁷ Recommendation: No change to Policy YV1, YV2, or SS5.
	If SUE built to the south the future of schools at Barwick and East Coker would be guaranteed and additional capacity if needed could be provided within the new primary school.	See response above. Recommendation: No change to Policy YV1, YV2, or SS5.
	Keyford is in the hands of a very small number of	Ability to deliver the urban extension in the Coker option is noted.

³⁷ Somerset School Organisation Plan 2013.

	owners who are completely aligned. Have carried out substantial analysis of the site and can deliver a high quality mixed use scheme there including new homes, a primary school, local centre, health centre, employment land, commercial land, open space and sustainable transport links.	Recommendation: No change to Policy YV1, YV2, or SS5.
9	Access to services/employment	
	The southern option has the advantage of being close to the train stations, the town centre, AgustaWestlands, Lynx Trading Estate.	Noted, the southern option is approximately 1.6km from the town centre, and 1km from AgustaWestlands and the Lynx Trading Estate. ³⁸ Recommendation: No change to Policy YV1, YV2, or SS5.
10	General approach	
	Support single site of 1,565 dwellings at Coker as it is deliverable, is the only location large enough to deliver the scale of growth and accompanying infrastructure and community facilities, and a buffer can be provided to Coker. Decisions should not be made because some people can afford legal advice and planning consultants. Coker has no more heritage than any other parish.	The Council's approach to identifying two SUEs is set out alongside the revised SA of Strategic Growth Options for Yeovil carried out by Enfusion. This document was discussed at the PMB Workshop 30: Proposed Main Modifications (October 2013). The Council contends that in order to represent a robust appraisal of "reasonable alternatives" it was necessary for the additional SA work 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. The work demonstrated that the delivery on one single site would not represent the most sustainable option. To ensure that the Local Plan conforms to the NPPF, it must be "effective". On this basis it must be deliverable over its plan period. As such it is appropriate that the SUEs only focus on delivering the necessary housing requirement for Yeovil in the plan period. Recommendation: No change to Policy YV1, YV2, or SS5.
	Do not agree with 800 dwellings at Keyford as it is not based on objective evidence.	The scale of growth (800 dwellings) in the Coker SUE has been based upon a range of evidence, such as landscape impact, historic environment, evidence of housing viability and deliverability, and the Sustainability Appraisal. Recommendation: No change to Policy YV1, YV2, or SS5.

³⁸ Strategic Growth Options for Yeovil SA report, October 2013.

	Neighbourhood Plan will bring about a workable solution for growth.	Noted. The Local Plan does not preclude neighbourhood plans being proposed and put forward. However, neighbourhood plans must be in general conformity with the strategic policies of the Local Plan (NPPF, para 184). Recommendation: No change to Policy YV1, YV2, or SS5.
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Soundness Issue 2: Policy PMT3 – Ilminster Direction of Growth. Proposed Main Modification 3

Canal Way		
Issue		SSDC Response
	Overall Need for Housing	
1	Support residential development in Canal Way because on the basis of existing commitments, a residual figure of 130 dwellings is required, and on the basis of the housing trajectory they will not come forward until 2022.	<p>Noted. However, the residual figure quoted appears to include planning applications which have yet to be determined, and not commitments / permissions.</p> <p>The current position is that the total housing requirement for Ilminster is 496 dwellings (2006-2028), but as at April 2012, there are 181 dwellings committed (either having been built or with planning permission), therefore the additional housing requirement to 2028 is 315 dwellings. It is important to recognise that the emerging Local Plan Policy SS5 establishes that the overall housing requirement is an “<i>at least</i>” figure, in line with the objectives of the NPPF as set out in Paragraph 14 and Paragraph 47.</p> <p>The housing trajectory does not determine when planning applications are submitted or when planning permissions are approved. It is a mechanism to identify the potential delivery of housing across the Local Plan period, based upon an understanding of when land may come forward for development. It is by nature, a flexible tool, which is subject to change.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object - there is no need for the housing growth identified for Ilminster, the proposal by Persimmon in Canal Way is sufficient.	<p>The housing growth identified for Ilminster has been justified in the Council’s Examination Statement on Issue 9, Ilminster (SSDC 009). The proposal by Persimmon in Canal Way (13/04760/FUL) is for 65 dwellings, the total identified housing requirement for Ilminster (2006-2028) is for 496 dwellings, and clearly the proposed development referred to above is not sufficient to meet this identified housing need for Ilminster over the plan period.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object - Ilminster cannot sustain the level of growth proposed, there are few jobs and new businesses are not coming to Ilminster.	<p>The Council’s Examination Statement on Issue 9, Ilminster (SSDC 009) justifies the level of growth identified for Ilminster over the Local Plan period and explains how the scale of housing growth reflects the evidenced economic growth potential of the settlement.</p>

		Recommendation: No change to PMM3 or Policy PMT3.
	Object - no need for the new housing identified, growth can be accommodated by bringing 2,000 empty homes in South Somerset back into use.	The Council's Examination Statement on Issue 4, District Wide Housing Provision (SSDC 004) addresses the issue of empty homes and concludes that the vacancy rate in South Somerset is historically under the national average 3% rate for both public and private homes. On this basis a reduction in the overall housing requirement for the District is not appropriate. Recommendation: No change to PMM3 or Policy PMT3.
	Object - 350 dwellings would mean approximately 700 additional vehicles, Ilminster's road network cannot accommodate this level of growth.	No evidence submitted to support this objection. Analysis by the Council, in conjunction with the Highways Authority and the Highways Agency, has identified that there will be no significant transport impacts on the strategic highway network as a result of growth at Canal Way. Somerset County Council has not raised concerns regarding the local highway network impacts of the proposed Direction of Growth at Canal Way. It will be for Development Management processes to consider the transport impacts of individual planning applications at Canal Way. It will be for the applicant to demonstrate that they can mitigate the impacts of the development, in line with other Local Plan policies, such as Policy TA1, Policy TA4, and Policy TA5. Recommendation: No change to PMM3 or Policy PMT3.
	Object - where is the evidence that house building will increase job opportunities? Housing more unemployed people will create social problems for Ilminster.	At a national level the Government has made the case for house-building as a key driver of economic growth in the wake of the recession, and this assumption is replicated at the local level. The Council's Examination Statement on Issue 9, Ilminster (SSDC 009) justifies the level of growth identified for Ilminster over the plan period and explains how the scale of housing growth reflects the evidenced economic growth potential of the settlement. Recommendation: No change to PMM3 or Policy PMT3.
2	Strategy for Ilminster	
	Object to residential development at Canal Way - the strategy should be to spread development around the town and not focus on one strategic Direction of Growth.	The Council's Response to The Local Plan Inspector's Initial Issues of Concern (February 2013) explains that there are several reasons why a more scattered approach to development in the Market Towns such as

		<p>Iminster was not considered, namely:</p> <ul style="list-style-type: none"> • the aspiration to create “sustainable” communities, • the fact that for most Market Towns the residual development required in the Local Plan is relatively low, meaning there is little capacity to identify smaller areas outside the “Directions of Growth” particularly given the intention to create sustainable communities, and • the requirement in the National Planning Policy Framework (para 157) that Local Plans should “indicate broad locations for strategic development on a key diagram and land use designations on a proposals map” and “allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate”. <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development at Canal Way as development of the Horlicks site should be considered as opposed to Greenfield sites. Infill and Brownfield sites should be before Greenfield.	<p>The Council’s Examination Statement on Issue 9, Iminster (SSDC 009) explains the approach taken to brownfield land in Iminster and justifies the need for a strategic Direction of Growth to satisfy the housing need over the plan period.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development at Canal Way - Swanmead School and the proposed residential development should be combined as one comprehensive development.	<p>Somerset County Council has confirmed that there are no current plans to redevelop Swanmead School and therefore this approach to development has not been considered further.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development at Canal Way because of the ‘threat’ of incorporating Donyatt into ‘greater Iminster’.	<p>The Local Plan has identified a strategic Direction of Growth and does not identify specific allocation(s). Donyatt and Iminster are clearly detached and the identified Local Plan housing requirement is for Iminster, not Donyatt. The Iminster Peripheral Landscape Study (Examination Core Document 68f) indicates that land between Iminster and Donyatt has a low capacity to accommodate built development because it is of high landscape and visual sensitivity, and therefore it is unlikely that future development would result in the coalescence of these two settlements.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
3	Highways Infrastructure	
	Support residential development as the Canal Way site is a more accessible site than Shudrick Valley - it has	<p>Support noted.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>

	excellent road links is on a bus route, easy, flat access to the town centre and close to existing services (schools, doctors, shops) and employment opportunities.	
	Support residential development at Canal Way, there is a misconception that there is a need for a road and that Shudrick Lane will deliver that road, but there is no justification for the road.	Support noted. Recommendation: No change to PMM3 or Policy PMT3.
	Support residential development at Canal Way, takes advantage of arterial road network and has good links to A358, A303 and M5.	Support noted. Recommendation: No change to PMM3 or Policy PMT3.
	Object to residential development as it would lead to traffic issues, particularly on-street parking given proximity of sports ground.	No evidence submitted to support this objection. Analysis by the Council, in conjunction with the Highways Authority and the Highways Agency, has identified that there will be no significant transport impacts on the strategic highway network as a result of growth at Canal Way. Somerset County Council has not raised concerns regarding the local highway network impacts of the proposed Direction of Growth at Canal Way. It will be for Development Management processes to consider the transport impacts of individual planning applications at Canal Way. It will be for the applicant to demonstrate that they can mitigate the impacts of the development, in line with other Local Plan policies, such as Policy TA1, Policy TA4, and Policy TA5. Recommendation: No change to PMM3 or Policy PMT3.
	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.	See answer above. Recommendation: No change to PMM3 or Policy PMT3.
	Evidence should be prepared to assess the import of the proposed development on the operation of the Southfields roundabout.	No evidence submitted to support this objection. Additional analysis has been prepared by the Council, in conjunction with the Highways Authority and the Highways Agency. It has identified that there will be no significant transport impacts on the strategic highway network as a result of growth at Canal Way. Somerset County Council has

		<p>not raised concerns regarding the local highway network impacts of the proposed Direction of Growth at Canal Way.</p> <p>It will be for Development Management processes to consider the transport impacts of individual planning applications at Canal Way. It will be for the applicant to demonstrate that they can mitigate the impacts of the development, in line with other Local Plan policies, such as Policy TA1, Policy TA4, and Policy TA5.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development at Canal Way, more distant from the town centre than Shudrick Valley site.	<p>The redrafted Sustainability Appraisal (Examination Soundness Issue 2, Direction of Growth for Ilminster - Background Report) identifies that Canal Way is more distant from the town centre than the Shudrick Valley site, and the sites are scored accordingly. The criteria “improve access to essential services and facilities” is one of a range of sustainability criteria which when assessed in the redrafted SA identifies that the Canal Way site is the better option, having no significant negative impacts and greater potential to mitigate the identified negative effects.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
4	Social Infrastructure - Education	
	Support residential development at Canal Way because the land is owned by Somerset County Council and the sale of the land will provide valuable funds for the public purse.	<p>Support noted.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development as there is no capacity in the existing schools to accommodate pupils from the new development.	<p>Discussions with the Education Authority confirm that there are capacity issues at Greenfyde School and there are very limited options for expansion. It is clear that there is a need for a new, replacement first school in Ilminster.</p> <p>However, as identified in the redrafted SA, and re-confirmed by the Education Authority, there is no current commitment to a new school because it is not within the County Council Capital Programme.</p> <p>SCC own the land at Canal Way and confirmation of the DOG at Canal Way provides for the opportunity to explore with SCC, how best to overcome existing education capacity constraints and the potential for</p>

		<p>delivering a new school.</p> <p>Whilst the issue of education capacity is clearly an issue for Ilminster, it does not warrant a change to the Proposed Main Modification. 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.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Social Infrastructure - Other	
	Support residential development at Canal Way as it offers an opportunity to utilise existing infrastructure with ease and by foot – doctor’s surgery, fitness club, public house, tennis courts and playing fields.	<p>Support noted.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Support residential development at Canal Way as it is in close proximity to allocated employment land.	<p>Support noted.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development at Canal Way on the basis of a lack of infrastructure (sports and recreation facilities should be considered) augmentation is required or numerous social problems could ensue.	<p>No evidence submitted to support the objection.</p> <p>The Council’s Infrastructure Delivery Plan does not identify any critical social / community infrastructure need in Ilminster. It will be for Development Management processes to consider the impacts of individual planning applications at Canal Way. It will be for the applicant to demonstrate that they can mitigate the impacts of the development, in line with emerging Local Plan Policy SS6.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
5	Town Centre Vitality and Viability	
	Support residential development as Canal Way is within easy walking distance of the Town Centre (flat walk).	<p>Support noted.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development at Canal Way because there is already too much development in this location and further development here would unbalance the town and isolate people from the Town Centre, which would affect its vitality and viability.	<p>Development at Canal Way would not be “isolated” from the town centre, as noted in the redrafted Sustainability Appraisal (Examination Soundness Issue 2, Direction of Growth for Ilminster - Background Report) Canal Way is located within 600m (at its closet point) and 1,100m (from the centre of the site) of the town centre which is still easy walking or cycling distance.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
6	Landscape Impacts	
	Support residential development at Canal Way because	Support noted.

<p>this would have less of a landscape impact than development in Shudrick Valley which is an Area of Outstanding Natural beauty, contains a higher grade best and most versatile agricultural land and has a steep topography. Development at Canal Way would minimise the loss of best and most versatile agricultural land.</p>	<p>Recommendation: No change to PMM3 or Policy PMT3.</p>
<p>Support residential development at Canal Way as development is only proposed on the lower slopes and therefore Herne Hill will be protected.</p>	<p>Support noted. Recommendation: No change to PMM3 or Policy PMT3.</p>
<p>Support residential development at Canal Way because it would have less of an impact than at Shudrick Valley which is a Special Landscape Area, includes 20 trees with TPOs, is an important visual boundary and visual impact would be high.</p>	<p>Support noted. Recommendation: No change to PMM3 or Policy PMT3.</p>
<p>Object to any residential development, the landscape around the town should be preserved from all directions.</p>	<p>The housing growth identified for Ilminster has been justified in the Council’s Examination Statement on Issue 9, Ilminster (SSDC 009). The Ilminster Peripheral Landscape Study (Examination Core Document 68f) identifies four areas on the periphery of Ilminster, which from a landscape perspective, have capacity to accommodate development. Recommendation: No change to PMM3 or Policy PMT3.</p>
<p>Object to residential development at Canal Way as it will have an adverse impact on Herne Hill, and the surrounding landscape.</p>	<p>Under criteria “protect and enhance the landscape and townscape” the redrafted Sustainability Appraisal (Examination Soundness Issue 2, Direction of Growth for Ilminster - Background Report) identifies that most of the land at Canal Way is of low to medium landscape and visual sensitivity, and having a high to moderate capacity to accommodate built development. The SA notes that mitigation, including the avoidance of the steeper, more attractive southern slopes (Herne Hill) will limit the impact of proposed development. Development here will not have an adverse impact on Herne Hill. Recommendation: No change to PMM3 or Policy PMT3.</p>
<p>Object to residential development at Canal Way as the land is of higher landscape sensitivity than at Shudrick Valley.</p>	<p>The Ilminster Peripheral Landscape Study (Examination Core Document 68f) identifies that most of the land at Canal Way is of low to medium landscape and visual sensitivity, with a high to moderate capacity to accommodate built development. The same study identifies that whilst most of the land at Shudrick Valley is also of low to medium landscape and</p>

		<p>visual sensitivity, with a high to moderate capacity to accommodate built development, there are however small but significant areas of landscape with a moderate to low capacity to accommodate built development within the Shudrick Valley option. The redrafted Sustainability Appraisal (Examination Soundness Issue 2, Direction of Growth for Ilminster - Background Report) identifies that mitigation, including the avoidance of the steeper, more attractive southern slopes will limit the impact of proposed development in Canal Way, whilst the pockets of high landscape sensitivity (along with a number of Tree Preservation Orders) means there is potential for a significant medium to long term negative effect on the landscape and townscape if development were in the Shudrick Valley option. The representation is refuted on this basis.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	<p>Object to residential development at Canal Way, development should be at Shudrick Valley - SSSC have submitted misleading maps to the Planning Inspector and development would not have an impact upon Pretwood Hill as the area of development would not be as great as is depicted on the submitted maps.</p>	<p>The representation is incorrect, the Draft Submission South Somerset Local Plan 2006-2028: List of All Modifications (Core Document 3b) contains Modification M182, Ilminster Inset Map 7 which makes the following modification “deletion of existing map and replacement with new map to show amendment to the direction of growth to avoid landscape designation and Pretwood Hill”. This was presented to the Local Plan Inspector.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
7	Agricultural Land Value	
	<p>Support residential development at Canal Way as this land is of less agricultural value than land at Shudrick Valley.</p>	<p>Support noted.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	<p>Object to residential development at Canal Way, the grading of agricultural land should be ignored, Canal Way is agricultural land that is farmed, and the productivity of the land is the issue.</p>	<p>Paragraph 112 of the National Planning Policy Statement requires local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land, and where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The grading of agricultural land cannot therefore be ignored. The agricultural land classification system is used by Natural England to give advice to planning authorities, developers and the public if development is proposed on agricultural land or other greenfield sites that could potentially grow crops. Natural England are a statutory consultee and they were consulted on the Proposed Main</p>

		<p>Modifications to the emerging Local Plan, they made the following comment: “having considered the modifications proposed, Natural England is satisfied that the changes to the Local Plan do not pose any additional risk to the natural environment”.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
8	Sustainability Appraisal	
	Object to residential development at Canal Way, it is based on an unsound SA - the SA states that development at Canal Way has greater potential to expand sports provision -any facility could be used by anybody from any part of town.	<p>The Local Plan Proposed Main Modifications Sustainability Appraisal Report (November 2013) considers access to services and facilities and notes Canal Way has the benefit of being adjacent to the Ilminster sports provision (Football and Cricket Clubs).</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development at Canal Way, it is based on an unsound SA - spurious argument that Canal way is closer to employment sites as the Strategic Employment allocation is not built and existing employment sites are being lost to residential development. Most employment opportunities exist in the east and therefore closer to Shudrick Lane site.	<p>The Local Plan Proposed Main Modifications Sustainability Appraisal Report (November 2013), along with the Ilminster - Background Report addresses the proximity of each option to employment opportunities in Ilminster.</p> <p>It is accepted that Canal Way does not score as positively as the other two options in relation to Objective 7: Support a strong, diverse, and vibrant local economy. However, when the SA is considered in its entirety, Canal Way represents the more sustainable option for a future Direction of Growth in Ilminster.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	Object to residential development at Canal Way, the Local Plan Inspector did not state that Canal Way was a better site, but that the proposal for Shudrick Lane was based on an unsound SA. The revised/new SA is also unsound.	<p>Noted. The Council has considered what the Inspector states in paragraphs 54 and 55. On this basis the Council has re-considered the Sustainability Appraisal for Canal Way, Shudrick Valley and the Option to the North of Ilminster. Based upon the revised appraisal it is the Council’s view that Canal Way represents the more sustainable option for a future Direction of Growth in Ilminster.</p> <p>Recommendation: No change to PMM3 or Policy PMT3.</p>
	<p>Object to residential development at Canal Way on the basis that the SA is unsound in the following places:</p> <p>Objective 1 – both options (Canal Way and Shudrick Valley) should score the same, Canal Way may be near the medical centre, but this is only one of a number of</p>	<p>Response is given by objective:</p> <p>Objective 1 – the Shudrick Valley option (++) is shown to have a more positive effect for this Objective because of its relative proximity to the services and facilities in the town centre.</p>

<p>essential services that residents require. Also unwise to base the scoring on distance and assumption that it may mean more residents would walk or cycle than drive.</p> <p>Objective 3 - query the number of houses, PMM3 cites 496 dwellings between 2006-2028, but SA refers to 332 dwellings.</p> <p>Objective 4 - the development will reduce the availability of open green space, research has shown that having access to green areas in towns and being able to spend time outdoors is beneficial to health and well-being. No amount of S106 money can conjure up green fields when they no longer exist.</p> <p>Objective 5 - few new employment opportunities available for new residents, therefore residents will commute.</p> <p>Objective 6 - uncertainty regarding master plan, so option should score neutral.</p> <p>Objective 7 - brownfield employment sites have been approved for residential development, what guarantee is there that Hort Bridge will come forward for employment and not housing. Ilminster's supply of employment land is diminishing, so how will residential development in Canal Way satisfy this objective, building on this site gives no guarantee that future jobs will follow. Dispute the fact that opportunities for tourism are unlikely to be created - development at Canal Way will have a serious adverse effect on the work that has been done by the Town Council to develop sustainable tourism.</p> <p>Objective 8 - to suggest that all of the options have "the potential for a residual minor negative effect on traffic" is</p>	<p>Objective 3 – The housing requirement for Ilminster for the remainder of the Local Plan period is 332. In seeking to ascertain a Direction of Growth for the town it is appropriate that the SA has regard to this figure.</p> <p>Objective 4 - the loss of greenfield land and green space has been considered. The Council considers that the appraisal for Canal Way should conclude the same as that for Shudrick Valley and the North option. Whilst Canal Way has better access to the Medical Centre, the other options have better access to health facilities in the town centre. This balance of provision should result in the options being scored equally. The distance between the various health facilities does not represent a significant difference in their ability to offer services.</p> <p>Recommended Change to SA – Objective 4. Canal Way change from ‘++ / -’ to ‘+ / -’ and change supporting text. No change to PMM3 or Policy PMT3.</p> <p>Objective 5 - the Council's Examination Statement on Issue 9, Ilminster (SSDC 009) justifies the level of growth identified for Ilminster over the plan period and explains how the scale of housing growth reflects the evidenced economic growth potential of the settlement. Additionally, the Strategic Employment Site in Ilminster is expected to deliver jobs during the plan period.</p> <p>Objective 6 – All options have been appraised to have "uncertain effect", as the likely impact is difficult to determine at the strategic level.</p> <p>Objective 7 – It is recognised that development at Canal Way could result in some out-commuting. However, traffic modelling on this route and the Southfields Roundabout does not indicate that transport movements will be significant. Proximity to the proposed employment sites provides an opportunity to develop more self-containment. No evidence has been submitted to substantiate that residential development at Canal Way will have a negative impact on tourism.</p> <p>Objective 8 – The Council considers that the appraisal for this Objective</p>
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<p>incorrect, development at Canal Way is likely to have a major long term negative effect on the basis that people will commute out to work and use their car more as there are limited alternatives.</p> <p>Objective 9 - Many consider the northern side of Canal Way overdeveloped and do not wish to see it repeated again. Development will do nothing to enhance the landscape or the 'rural' nature of the town. Query that development will not take place on the slopes of Herne Hill because the site is in the SHLAA – this will have a major and long lasting impact on the town.</p> <p>Objective 10 - historic environment is greater than the built environment, Canal Way was once a Medieval Deer Park, additionally Stone Age and Roman archaeology has been found in the area.</p> <p>Objective 11 - developers cannot be forced to utilise carbon reducing technologies.</p> <p>Objective 12 - the effect on the farm and the loss of its land is not a minor effect.</p> <p>Objective 13 - there is a risk of flood at Canal Way. What guarantees are there that SuDS would be incorporated into the scheme? This is not a minor positive impact.</p> <p>Objective 14 - this section is incorrect, there are designations in the area.</p>	<p>should be revised. This would recognise that the potential for a new road at Shudrick Valley should not feature as prominently as it currently does within the appraisal. There is no current evidence to indicate that it would be required, or that the development would facilitate the delivery of a road. Discussions with the Highways Authority have not indicated that a road is a pre-requisite or a desirable aspect of development at Shudrick Valley.</p> <p>Recommended Change to SA. Objective 8. Shudrick Valley change from '++ / -' to '+ / -' and change supporting text. No change to PMM3 or Policy PMT3.</p> <p>Objective 9 - the Ilminster Peripheral Landscape Study (Examination Core Document 68f) identifies the differences in landscape and visual sensitivity, and landscape capacity within the town – including the locations for each of the Options appraised.</p> <p>The revised SA takes account of this evidence and identifies the differences between the Options and the 'significant negative' effect at Shudrick Valley due to its impact on land classified as medium landscape sensitivity and high landscape sensitivity. The effect at Canal Way is deemed to a 'negative' effect due to the majority of the proposed Direction of Growth falling within the category of low landscape sensitivity.</p> <p>Objective 10 – Disagree. However, the Council has considered the SA of Objective 10 in light of additional historic environment assessment work. The Council concludes that Canal Way should not be scored as a neutral impact (0) but as a negative impact (-).</p> <p>The further assessment has highlighted the following points:</p> <p>Shudrick Valley - the option abuts the south eastern edge of the Conservation Area (CA) and has the largest boundary with it. The northern margin of the option is within an Area of High Archaeological Potential (AHAP). In terms of archaeology it is considered that development of this option could have a slight/moderate effect on assets. There are two Listed</p>
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Buildings (LBs) outside CA in close proximity to the option (30m & 75m) and several LBs within the CA on Bay Hill and Townsend including a Grade 2* listing, further away from option, but in an elevated position. Shudrick Valley and Pretwood Hill form part of their setting. Development at this option would radically alter the setting from a rural one to a substantially urban one, which would be substantial and cause harm to the settings of both the CA and the LBs. Given the potential for development to have a harmful effect upon the setting of designated heritage assets and the potential negative impact on archaeology, the potential significant negative impact of development on Shudrick Valley option is justified.

Canal Way - the DOG is 150m away from the south western edge of the CA and 175m from the AHAP. In terms of archaeology it is considered that development of this option could have a slight/moderate effect on assets. The option is also a valley with land behind forming the skyline (Herne Hill) when seen from the western extent of the CA along Station Road which here contains a high proportion of listed buildings. The valley is a less significant part of the setting of these assets with less inter-visibility because of distance and the gentler topography. Existing Canal Way development also intervenes and forms part of the existing setting which as a result will be less changed by further building within the valley. Particular harm would only occur if development encroached higher up the slopes of Herne Hill. Given that there is the potential to have an impact upon archaeology and the historic environment, a neutral scoring appears unjustified hence a change to a minor negative scoring.

Recommended Change to SA - Canal Way from 0 to - and changes to the commentary to explain. No change to PMM3 or Policy PMT3.

Objective 11 - Proposed Submission South Somerset Local Plan Policy EQ1 (Addressing Climate Change in South Somerset) encourages new development to minimise CO2 emissions through energy efficient measures.

Objective 12 - the SA takes into account potential impact on Coldharbour Farm in that it states "the requirement to rationalise farm land holdings

		<p>whilst uncertain indicates a negative impact on existing farming operations”. The SA recognises the potential impact and has been undertaken on this basis.</p> <p>Objective 13 - the Environment Agency has not objected to development at Canal Way and consider that there will be an engineering solution to surface water run-off. Proposed Submission South Somerset Local Plan Policy EQ1 (Addressing Climate Change in South Somerset) supports the use of SuDS as one such solution. Evidence of local surface water flooding is noted. All these issues have been considered as part of the SA process.</p> <p>Objective 14 - the SA states that “there are no wildlife or geodiversity designations within or in close proximity to this Option (Canal Way) and so it is unlikely that there would be any significant effects on designated sites as a result of development.”, the presence of Herne Hill was raised. Herne Hill is a Local Site of Nature Conservation importance (a County Wildlife Site - ancient woodland) local designations such as these are not legally protected and carry less weight in terms of assessment and decision-making. The National Planning Policy Framework (NPPF) states that <i>“Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks”</i>. On this basis the Sustainability Assessment scores are correct for Objective 14 because there are no national, statutory designations at Canal Way and therefore development in this location would not result in significant harm to wildlife of geodiversity designations.</p>
	<p>Object - SA unsound.</p> <p>Objective 1 - Shudrick is closer to town centre than Canal way and so should score better as easier to walk. Other essential service (post office, youth club, schools, dentist) are closer to Shudrick than Can Way, but focus is on medical centre. Road at Shudrick will make access to</p>	<p>Objective 1 - see answer above.</p> <p>Objective 4 - see answer above.</p> <p>Objective 5 - all sites have scored the same as there is no significant difference between the sites.</p>

<p>town centre easier.</p> <p>Objective 4 - other services are essential for health, not just medical centre - Shudrick should score better as development of Canal Way would reduce opportunities to access the land for walking etc.</p> <p>Objective 5 - Shudrick should score better as it is nearer existing schools, pre-schools and adult learning centre.</p> <p>Objective 6 - it is easier to commit crime at Canal Way as easier access to trunk roads, so it should score more negatively.</p> <p>Objective 7 - Canal Way is questionably closer to employment because there are concerns over the viability of Horlicks and Winterhay Lane going to housing. Herne Hill is a tourism hotspot, development will affect it and the associated economic gains. Development at Shudrick will better support the town centre. Ilminster Town Council wish to designate the space around Herne Hill as a 'green lung' for tourism and do not want to detract from that. Have SSDC done an Equalities Impact assessment? Viability of Coldharbour farm would be affected.</p> <p>Objective 8 - Shudrick closer to public transport hub, link road would enable provision of better public transport routes. Link road could improve pedestrian access East Street/Silver Street.</p> <p>Objective 9 - skirt of development along Canal Way should score the site more negatively.</p> <p>Objective 10 - scoring fails to take into account that Canal Way contains medieval Deer Park and Stone Age and</p>	<p>Objective 6 - there is no evidence to support this objection.</p> <p>Objective 7 - see answer above. Additionally, no evidence has been submitted to substantiate that residential development at Canal Way will impact on tourism at Herne Hill or the Town Council's aspiration to designate Herne Hill a Green Lung. The redrafted Sustainability Appraisal identifies that Canal Way is located within 600m (at its closet point) and 1,100m (from the centre of the site) of the town centre which is still easy walking or cycling distance. An Equalities Impact Assessment has been undertaken. Coldharbour Farm is currently let by SCC on a Farm Business Tenancy and it is the County Council's intention to rationalise this holding over time to release any land required by South Somerset District Council to meet the growth needs of Ilminster (<i>see further evidence, January 2014</i>). To date, no decision has been taken by SCC as to the final form of any rationalisation may take, it could range from a continuation of the current holding on a reduced scale, the balance of the land at Coldharbour Farm being amalgamated with other existing SCC holdings, or further agricultural land being acquired to offset (in whole or part) any land released for development. Criteria 7 is one of a range of sustainability criteria which when assessed in the redrafted SA identifies that the Canal Way site is the better option, having no significant negative impacts and greater potential to mitigate the identified negative effects.</p> <p>Objective 8 - see answer above.</p> <p>Objective 9 - see answer above. Additionally, the revised Sustainability Appraisal (Examination Soundness Issue 2, Direction of Growth for Ilminster - Background Report) notes that mitigation, including the avoidance of the steeper, more attractive southern slopes (Herne Hill) will limit the impact of proposed development. Development here will not have an adverse impact on Herne Hill.</p> <p>Objective 10 - see answer above.</p> <p>It is noted that Herne Hill was gifted to Town Council for the residents of</p>
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<p>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.</p> <p>Herne Hill gifted to Town Council for residents of Ilminster.</p>	<p>Ilminster.</p>
<p>Object - process and procedure to determine the most appropriate strategy for Ilminster is unsound because:</p> <ul style="list-style-type: none"> • Previously raised concerns with District Council and Inspector that evidence was presented at the Examination by respondents who had not made duly made representations. Concerned that redrafted SA has used this evidence to revise SA and this is unsound because of the legitimacy of some of the evidence presented at examination. In addition, concerned that Canal Way SA was in effect pre-determined. • Concerned that the Town Council's view has been dismissed. • Concerned that conclusion drawn in relation to some of the SA objectives, indicate a significant change in approach from previous iterations of the appraisal without evidence. • Lack of consistency between the Yeovil SA and Ilminster SA work, <p>Object - errors in the SA and results in a failure to identify the most appropriate strategy for future housing development at Ilminster.</p> <p>Objective 2 - proximity of Shudrick to town centre offers opportunities to improve social exclusion.</p> <p>Objective 4 - proximity of Canal Way to the new medical</p>	<p>The Council has considered and revised the SA for the Options for the Directions of Growth in light of the Inspector's Preliminary Findings, consultation responses and discussions with Ilminster Town Council. The Council believes it has complied with the formal processes necessary for consultation and has considered responses appropriately and legitimately.</p> <p>The SA has been subject to a Quality Assurance check by independent consultants Enfusion.</p> <p>Objective 2 - the revised SA (Examination Soundness Issue 2, Direction of Growth for Ilminster - Background Report) identifies no significant difference between the options for this criterion. Each of the options is considered to have the potential for indirect positive effects on SA Objective 2. The relative distance from services and facilities does not sufficiently justify significant differences between the options.</p> <p>Objective 4 – the loss of greenfield land and green space has been considered. The Council considers that the appraisal for Canal Way should conclude the same as that for Shudrick Valley and the North option. Whilst Canal Way has better access to the Medical Centre, the other options have better access to health facilities in the town centre. This balance of provision should result in the options being scored equally. The distance between the various health facilities does not represent a significant difference in their ability to offer services.</p> <p>Recommended Change to SA – Objective 4. Canal Way change from '++ / -' to '+ / -' and change supporting text. No change to PMM3 or Policy PMT3.</p> <p>Objective 5 – the appraisal identifies no significant difference between the</p>

<p>centre results in a more positive scoring, this is queried and positive health benefits of Shudrick articulated.</p> <p>Objective 5 - reference to Canal Way being able to deliver land for a school is misleading as Shudrick could deliver land also. No weight should be given to this point.</p> <p>Objective 8 - Canal Way should score less positively.</p> <p>Objective 9 - contrary to previous assessment statements, Shudrick should score more positively (single as opposed to double negative) because of the about-turn on landscape impact.</p> <p>Objective 10 - significant negative impacts cited for Shudrick is unjustified.</p> <p>Objective 12 - state that whilst land is graded 3a, its usability for farming practices is limited due to size etc.</p>	<p>Options for this objective. Discussions with the Education Authority have highlighted that land to the South West would help in terms of deliverability and viability of a replacement school.</p> <p>Objective 8 - The Council considers that the appraisal for this Objective should be revised. This would recognise that the potential for a new road at Shudrick Valley should not feature as prominently as it currently does within the appraisal. There is no current evidence to indicate that it would be required, or that the development would facilitate the delivery of a road. Discussions with the Highways Authority have not indicated that a road is a pre-requisite or a desirable aspect of development at Shudrick Valley. Recommended Change to SA. Objective 8. Shudrick Valley change from ‘++ / -’ to ‘+ / -’ and change supporting text. No change to PMM3 or Policy PMT3.</p> <p>Objective 9 - The Ilminster Peripheral Landscape Study (Examination Core Document 68f) identifies that most of the land at Canal Way is of low to medium landscape and visual sensitivity, with a high to moderate capacity to accommodate built development. The same study identifies that whilst most of the land at Shudrick Valley is also of low to medium landscape and visual sensitivity, with a high to moderate capacity to accommodate built development, there are however small but significant areas of landscape with a moderate to low capacity to accommodate built development within the Shudrick Valley option. The pockets of high landscape sensitivity (along with a number of Tree Preservation Orders) means there is potential for a significant medium to long term negative effect on the landscape and townscape if development were in the Shudrick Valley option.</p> <p>Objective 10 – the Council has considered the SA of Objective 10 in light of additional historic environment assessment work. The Council concludes that Canal Way should not be scored as a neutral impact (0) but as a negative impact (-).</p>
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		<p>The further assessment has highlighted that there is the potential to have an impact upon archaeology and the historic environment, hence a change to a minor negative scoring.</p> <p>Recommended Change to SA. Objective 10 - Canal Way change from '0' to '-' and change supporting text. No change to PMM3 or Policy PMT3.</p> <p>Objective 12 - The agricultural land classification system is used by Natural England to give advice to planning authorities, developers and the public if development is proposed on agricultural land or other greenfield sites that could potentially grow crops. The grading of agricultural land is an agreed constant and allows for successful comparison and debate. Utilising individual soil assessments would prejudice the overall consistency of the assessment of Options and would require identical soil assessments in each of the potential growth Options in Ilminster and South Somerset. It is felt that this is not a justifiable approach. In Yeovil, all of the options considered for strategic growth (in Yeovil Strategic Growth Options SA Report, October 2013) contain best and most versatile agricultural land, therefore it was appropriate in that circumstance for the SA to distinguish between the different grades. In Ilminster, only Options 1 and 3 contain best and most versatile agricultural land, so there is the potential for significant negative effects.</p>
	<p>Objective 5 of SA - Canal Way should score more positively because it can deliver a school. School not currently included in a timetable because when the school will be needed remains uncertain.</p> <p>Objective 7 - previous SA scored Canal Way a double ++, redrafted SA scores a single + with no clear indication of why the scoring has changed.</p> <p>Objective 8 - It is not clear why Canal Way scores +/- when it previously scored a + and Shudrick lane site now scores a ++/- when previously scored +/-.</p>	<p>Objective 5 - See answer above</p> <p>Objective 7 - Noted and disagree. While Option 1 is identified as being furthest away from existing employment sites to the west of the town (35% of the of town's total employment), it is also identified as being better located for the jobs available in the town centre and the south of the town (65% of town's total employment total). Given the proximity of Option 1 to the town centre it also has the potential to support local and services.</p> <p>Objective 8 - The Council considers that the appraisal for this Objective should be revised. This would recognise that the potential for a new road at Shudrick Valley should not feature as prominently as it currently does</p>

	<p>Objective 9 - when compared with the other options it is considered that development in the DOG would have the least impact in landscape terms, but the SA scoring does not reflect the landscape character of the Canal Way area and it should be scored more positively.</p> <p>Objective 12 - Grade 3a Agricultural Land present at Canal Way.</p> <p>Objective 13 - There is inconsistency in scoring between different SAs.</p>	<p>within the appraisal. There is no current evidence to indicate that it would be required, or that the development would facilitate the delivery of a road. Discussions with the Highways Authority have not indicated that a road is a pre-requisite or a desirable aspect of development at Shudrick Valley. Recommended Change to SA. Objective 8. Shudrick Valley change from ‘++ / -’ to ‘+ / -’ and change supporting text. No change to PMM3 or Policy PMT3.</p> <p>Objective 9 - Noted and disagree. The SA was informed by the Ilminster Peripheral Landscape Study (Examination Core Document 68f).</p> <p>Objective 12 - the Grade 3a land has already been developed.</p> <p>Objective 13 – redrafted SA replaces previous versions of the SA. No change to PMM3 or Policy PMT3.</p>
9	Historic Environment	
	Support residential development at Canal Way because Shudrick Valley site is of high archaeological value (iron age remains have been found).	Support noted. No change to PMM3 or Policy PMT3.
	Object to residential development at Canal Way because there is potential significant industrial archaeology as it is the site of a disused canal.	The County Archaeologist has summarised the archaeological issues associated with development at Canal Way (<i>see further evidence, January 2014</i>). The potential for industrial archaeology is not identified as an issue. No change to PMM3 or Policy PMT3.
10	Flood Risk	
	Support residential development at Canal Way, the application for the medical centre (April 2009) contained a flood risk assessment report which not only evidenced flood risk in Shudrick Lane and Ditton Street (hence Shudrick Lane shouldn't be developed) but demonstrated that development was acceptable at Canal Way.	Support noted. No change to PMM3 or Policy PMT3.
	Object to residential development in Canal Way as flooding is already an issue in the vicinity of Canal Way (River Isle floodplain), and this would be exacerbated by further residential development in this location.	The Environment Agency consider that there will be an engineering solution to surface water run-off, but note that any developer 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 or a site specific SFRA.

		No change to PMM3 or Policy PMT3.
	Support residential development in Canal Way but recognise that there are known flood issues in the vicinity, principally associated with surface water flooding which SSSDC drainage engineers should lead on.	Noted – SSSDC continues to work closely with SCC on flood risk issues. Any necessary on-site mitigation will be provided by the developer as part of a detailed planning application for Canal Way. No change to PMM3 or Policy PMT3.
11	Coldharbour Farm	
	Support residential development at Canal Way, Coldharbour farm will be relocated not lost. Only 15% of the land will be lost.	Support noted. No change to PMM3 or Policy PMT3.
	Object to residential development at Canal Way because of the impact it will have on the viability of Coldharbour Farm which is farmed by a local family.	PMB Workshop 4 (5/7/11) Market Towns – Directions of Growth for Ilminster, addresses the issue of Cold Harbour Farm and its future viability. In summary, the report explains that Somerset County Council's (SCC) County Farms department were aware that the farm's viability would be affected by the loss of land but that the County Council's policy at the time regarding the whole County Farm Estate was to no longer focus on providing farming opportunities. SCC did not object in principle to the potential direction of growth for residential development. Further to this report an email has confirmed that Coldharbour Farm is currently let by SCC on a Farm Business Tenancy and it is the County Council's intention to rationalise this holding over time to release any land required by South Somerset District Council to meet the growth needs of Ilminster (<i>see further evidence, January 2014</i>). To date, no decision has been taken by SCC as to the final form of any rationalisation may take, it could range from a continuation of the current holding on a reduced scale, the balance of the land at Coldharbour Farm being amalgamated with other existing SCC holdings, or further agricultural land being acquired to offset (in whole or part) any land released for development. No change to PMM3 or Policy PMT3.
	Object to residential development at Canal Way because the redevelopment of Coldharbour Farm will mean that some of the houses will be in Donyatt.	The Local Plan indicates broad strategic Directions of Growth and does not identify specific allocations. Donyatt and Ilminster are clearly detached and the identified Local Plan housing requirement is for Ilminster, not Donyatt. No change to PMM3 or Policy PMT3.
12	Biodiversity	
	Support residential development at Canal Way as there	Support noted.

	are Long-eared bats on the Shudrick Lane site.	No change to PMM3 or Policy PMT3.
	Strategy does not comply with para 126 of the NPPF, adverse impact on nature, ecology and biodiversity of Canal Way.	In summary paragraph 126 of the NPPF requires local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment. The historic environment, nature, ecology and biodiversity of Canal Way have all be considered through the redrafted Sustainability Appraisal (Examination Soundness Issue 2, Direction of Growth for Ilminster - Background Report) which SA identifies that the Canal Way site is the better option, having no significant negative impacts and greater potential to mitigate the identified negative effects. No change to PMM3 or Policy PMT3.
13	Other	
	Residents aggrieved over consultation process - not long enough and over Christmas period. Not in line with national guidelines.	The Council's approach was in accordance with the legislative and regulatory guidelines for consultation on the Local Plan. It must be borne in mind that the consultation of the Proposed Main Modifications was a non-statutory consultation. The project timetable for overcoming the Inspector's Preliminary Findings has been agreed with the Inspector and this timetable has been adhered to. No change to PMM3 or Policy PMT3.
	A secondary school should be built in Ilminster.	Noted. Somerset County Council are clear that Ilminster is not large enough for a Secondary School, and that 11+ education is clearly focused in Crewkerne. No change to PMM3 or Policy PMT3.
	New homes on Canal Way will not be able to get insurance because of the flooding.	Environment Agency considers that there will be an engineering solution to surface water run-off and therefore there is no evidence that Canal Way will experience flooding. No change to PMM3 or Policy PMT3.
	The view of the Town Council should not be ignored.	Representations made by Ilminster Town Council have not been ignored and have analysed as part of the various consultation processes undertaken by the Council. No change to PMM3 or Policy PMT3.

Soundness Issue 3: Policy SS3 – Delivering New Employment Land. Proposed Main Modification 4

General Comments		
Comment / Issue		SDDC Response
1	The Council has not thought through the employment figures, they are just submitting figures that may justify their cause	<p>Noted – The employment figures have been defined through the preparation of a robust evidence base which analyses the economic future of the district.</p> <p>Additional analysis was prepared in May 2013 (South Somerset District Council Hearing Statement – Issue 3: Economic Prosperity and Employment Provision) to answer the Inspector’s pre-examination questions. This information was considered at the Examination. The Inspector’s Preliminary Findings (July 2013) raised some concerns regarding the apportionment of employment land to specific settlements. To address these concerns, further evidence was prepared and reviewed at the Council’s Examination Suspension Project Management Board – Item 4b, Workshop 30: 25th October 2013. It is this evidence base trail and refinement that has resulted in the employment figures presented in Proposed Main Modification 4.</p> <p>Recommendation: No change to PMM4 or Policy SS3</p>
2	Attracting new business key aspect of any development. Good to see new employment land net increase.	<p>Noted.</p> <p>Recommendation: No change to PMM4 or Policy SS3</p>
3	Welcome the inclusion of employment and employment land targets for Local Market Towns and Rural Centres, recognising the role that appropriate employment provision plays in delivering sustainable communities	<p>Noted.</p> <p>Recommendation: No change to PMM4 or Policy SS3</p>
4	Land should be identified for economic development and not distinguish between B uses and non B uses	<p>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:</p>

		Location of Main Town Centre Uses (the Sequential Approach). Recommendation: No change to PMM4 or Policy SS3
5	The 5ha of employment land in the Yeovil urban extensions should be removed, recognising that these are not now considered to be highly self-contained	Both Sustainable Urban Extensions include a scale of employment land which is commensurate to the number of dwellings planned. This is to encourage the highest possible level of sustainable development and to encourage greater self-sufficiency. The objective is to provide enhanced job opportunities for each economically active resident. This is in line with Paragraphs 19 & 20 of NPPF, which state: 'planning should operate to encourage and not act as an impediment to sustainable growth' and 'to achieve economic growth, local planning authorities should plan proactively to meet the development needs of business.' Recommendation: No change to PMM4 or Policy SS3
6	Do not agree that 2,500 jobs will be created by building houses. SSDC's record on attracting jobs is demonstrated by the Yeovil Innovation Centre which provides only 130 jobs after over 5 years.	Noted but not relevant to the Proposed Main Modification under consideration. Recommendation: No change to PMM4 or Policy SS3
Market Towns		
Comment / Issue		SSDC Response
1	The area of employment land lost to housing is 2.07ha not 1.53ha as stated by SSDC. There is also a problem of 1.2ha of allocated employment land on the New Barns Farm site which has been used for non-B uses	1.53ha relates to losses to other Use Classes not just housing (which accounts for 0.77ha). Development at New Barns Farm includes a medical centre. The other 0.76ha include a variety of non-B uses, including leisure and retail facilities. These facilities do contribute to jobs growth in the district and have an direct and indirect positive economic impact. Recommendation: No change to PMM4 or Policy SS3
2	The area of employment land required in Wincanton is 6ha, but there is potential for higher, to minimise outward commuting and resultant CO2 emissions.	Noted. The employment land requirements have been calculated on the basis of an approved methodology and a robust evidence base. The jobs target within emerging Local Plan Policy SS3 is a minimum and, further employment growth in Wincanton could be forthcoming subject to it delivering sustainable development for the settlement. Recommendation: No change to PMM4 or Policy SS3
3	The scale of employment land required in Crewkerne is far in excess of the need as set out in the Employment Land Review (2010) and also in excess of the land required for the number of jobs identified	Noted – However a review of the Crewkerne employment land requirement was not part of this proposed modification. It was identified in the paper Revising Policy SS5: Delivering New Employment Land, catering for non B-Uses and the distribution of homes/jobs (PMB Workshop 2) that Crewkerne employment was

	(352)	a strategic employment land allocation that had been stifled but SSDC believe this will come forward in the emerging Local Plan period. Recommendation: No change to PMM4 or Policy SS3
4	On paper Wincanton has 5ha of employment land in fact almost none identified and when an employer sought to relocate, SSDC were unable to identify 12 acres of land (providing 75 jobs) for purchase at Wincanton. No consultation has been carried out and the employment land has been reduced for some inexplicable reason however still none has been identified for actual use.	Proposed Main Modification 4 sets out 3.5Ha of employment land for Wincanton, comprising 0.29Ha that has already been built (since 2006), 2.37Ha that currently has planning permission, and 0.9Ha of a 'saved' existing allocation that is being carried forward into the emerging Local Plan. The provision of an additional 4.38Ha is consistent with objectively assessed need for Wincanton. Recommendation: No change to PMM4 or Policy SS3
5	Revised proposals for Castle Cary/Ansford not sound. Evidence not robust as evidenced by SSDC'S own comments as to the certainty and reality of the employer demand – leading to an employment land allocation of 18.97ha. Approach takes no account of nearby employment proposals e.g. Royal Bath & West Showground (5 miles away). Approach predicted on large land allocation and low density job generation. Roads not suitable for heavy lorry use. Employment on one or two large employers is not future proofing.	Additional requirement is for 8.9ha, in response to an identified need to relocate existing businesses. This will release the existing sites for new employment growth. Recommendation: No change to PMM4 or Policy SS3
Rural Centres		
Comment / Issue		SSDC Response
1	What are the four sources of evidence to identify demand in Ilchester? What pent up demand totally unfounded and wholly incorrect and arrogant opinion.	Pages 1 to 6 of Item 4B: Proposed Main Modification Background and Further Evidence presented to PMB Workshop 30 on the 25 th October 2013 sets out the information in relation to the sources and evidence base identifying employment demand in the District. Recommendation: No change to PMM4 or Policy SS3
2	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. Recommendation: No change to PMM4 or Policy SS3

3	Inappropriate and illogical to have a target to develop a particular quantum of employment land within Rural Settlements. Suggests revised wording to tie Rural Settlements to SS2.	<p>Emerging Local Plan Policy SS2 does make provision for development in Rural Settlements to be appropriate to the scale of the settlement. Whilst it would seem appropriate to restrict development in the open countryside, Paragraph 28 of the NPPF in relation to supporting a prosperous rural economy does not make that distinction. It aims to: “support sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and new designed new buildings; promote the development and diversification of agricultural and other land-based rural businesses and; support sustainable rural tourism and leisure developments that benefit businesses in rural areas”.</p> <p>As such a further restriction to SS2 would appear to be contrary to the requirements of the NPPF.</p> <p>Recommendation: No change to PMM4 or Policy SS3</p>
4	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>For the avoidance of doubt, Item 4B highlights 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> <p>Recommendation: Recommendation: No change to PMM4 or Policy SS3 / Minor change to supporting text</p>
5	More employment land should be directed to the Rural Centres and Rural Settlements as the rural economy has performed well compared with the urban economy, reflected in Yeovil in the fact that 10ha of employment land was never allocated in the previous plan period despite strong economic growth.	<p>The ‘10 hectares’ are derived from the Local Plan 1991 - 2011 Inspector’s Report in which he recommended at least 10ha in Yeovil, which was ultimately never allocated.</p> <p>The evidence base prepared for the emerging Local Plan 2006 – 2028 has robustly assessed the employment demand and supply for Yeovil. It is on the basis of this evidence that the 50Ha, of which 10.16Ha is still to be forthcoming are identified for Yeovil.</p> <p>Recommendation: No change to PMM4 or Policy SS3</p>

6	Support the change in employment requirement for Martock/Bower Hinton – believe that the “specific large employer” is Unwin Safety Systems. However that land on which this company wishes to expand has been approved for housing (13/01500/OUT)	Noted. Recommendation: No change to PMM4 or Policy SS3
7	Lopen – supporting evidence is not accurate or sound – Policy SS3 shows South Petherton as having commitments of 1.81ha (1.8ha at Lopen Head) – this is not the case – site is large due to various planning approvals. Local Plan para 7.65 (and M196) states that “Previous association of Lopen Head employment can’t be presumed” indicates an acceptance that Lopen Head is a Rural Settlement provision. Justification has been made by developers and accepted by SSDC for disproportionately large scale development – if approach continues will set a precedent. ME/LOPE/1 in adopted Local plan was not listed under employment provision for Rural Centres. Policy is for small-scale employment opportunities – no reference to South Petherton. PMB 30 recognises the historic approach – Plan now chooses to fully account for the site under Rural Centres – South Petherton. PMB 30 Item 6 sets out the distribution of jobs growth and Lopen Head site is clearly included in South Petherton’s figures, net effect is that the historic distribution of jobs to Rural Centres as a whole is over stated with forward projections equally distorted. Job projection based figures are likely to be distorted (see rep for detailed figures).	<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 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> <p>Recommendation: No change to PMM4 or Policy SS3</p>
8	Policy SS3 demonstrates that 50.2ha of employment land is required across the District to meet B use jobs growth, existing commitments are stated as 104.4ha twice that actually required and yet an additional 59.1ha is allocated totalling 163.5ha – no justification for this huge excess.	Employment land requirement is fully explained and justified in Table 1: Employment Land Justifications in the Proposed Main Modifications Consultation Document. Recommendation: No change to PMM4 or Policy SS3

9	SSDC has been treating the District Ward of South Petherton as a Rural Centre as a whole and assessing planning applications on that basis. This approach clearly distorts the figures. Approach is not sound and should be corrected.	This is incorrect as planning applications (including for Lopen Head) have been assessed under the policies in the adopted Local Plan 1991 - 2011. The allocated Lopen Head Nursery (ME/LOPE/1) site is identified under 'villages' and is acknowledged as the potential to meet the need of local employment users. Recommendation: No change to PMM4 or Policy SS3
10	Targets for Rural Settlements should be removed and replaced with an allowance for employment development that may come forward as a result of other policies in the plan and NPPF. Policy should ensure that any employment delivered in Rural Settlements is delivered within or directly adjacent to the settlement and not in open countryside.	Policy SS3 does make provision for development in Rural Settlements to be appropriate to the scale of the settlement. Whilst it would seem appropriate to restrict development in the open countryside, para 28 of the NPPF 'Supporting a prosperous rural economy', does not make that distinction. It aims to 'support sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and new designed new buildings; promote the development and diversification of agricultural and other land-based rural businesses and; support sustainable rural tourism and leisure developments that benefit businesses in rural areas'. As such a further restriction to SS3 would appear to be contrary to the requirements of the NPPF. Recommendation: No change to PMM4 or Policy SS3
11	If possible development of Durslade Farm should count against the target. Town Council support small scale office, workshop and light industrial uses (B1) subject to scale impact, appearance and parking. Suitable retail proposals will be supported subject to scale etc. Seek to protect existing employment land. B2 and B8 uses are considered inappropriate. Tourism and recreational activities and facilities will be supported. (TC attached Bruton Town Council Planning Policy.)	Durslade Farm is located outside of development limits and not contiguous with the settlement boundaries. It is an employment site which has been considered appropriate based upon national and local policy criteria. It is not appropriate that this previous permission counts against the future requirement for employment land. Recommendation: No change to PMM4 or Policy SS3
12	Not the most appropriate strategy for Bruton	Noted. The evidence base for employment growth and employment land requirements within South Somerset has been developed and refined to ensure sustainable development occurs throughout the district. The evidence base has established the most appropriate level of employment land for Bruton. Recommendation: No change to PMM4 or Policy SS3

Point of Clarification 1: Policy SS5 – Delivering New Housing Growth. Proposed Main Modification 5

Market Towns		
Comment / Issue		SSDC Response
1	<p>Fails to give clarity on how to deal with housing proposals in Market Towns that have no defined Direction of Growth prior to adoption of the Site Allocations DPD e.g. Wincanton. Is it to be assumed that the permissive approach will be confined to the existing Development Area of a Market Town? Clarity is required.</p>	<p>Wincanton has a defined Direction of Growth to accommodate additional employment growth only (Policy SS3 Delivering New Employment Land). PMM4 proposes 4.38 Ha a reduction of 0.62 Ha on the 5.0 Ha in the Proposed Submission Local Plan 2006-2028, June 2012.</p> <p>Policy SS5: Delivering New Housing Growth includes a residual housing requirement of 5 dwellings for Wincanton, with the provision for a review of this figure through Proposed Main Modification 6. This has been defined in line with the Inspector’s Preliminary Findings, Points for Clarification (paragraphs 63 and 64, July 2013). Paragraph 6.94 of the tracked changes Proposed Submission Local Plan states that these 5 dwellings could be accommodated “...within the existing Development Area.” The Local Plan sets out a clear approach to the delivery of housing growth at Wincanton over the plan period and allows for a period of assimilation of significant past growth. Given that Wincanton does not have a Direction of Growth for housing, paragraph 4.103 does not apply.</p> <p>Recommendation: Suggest that 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>
2	<p>Proposed Main Modification text implies that permissive approach does not apply in Wincanton.</p>	<p>See response above and responses to Proposed Main Modification 6.</p> <p>Recommendation: No change to Policy SS5</p>
3	<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>Policy SS5: Delivering New Housing Growth, of the Proposed Submission Local Plan 2006-2028 identifies the provision of 961 dwellings in Crewkerne over the plan period. The majority of this growth is taken up by the saved adopted Local Plan Policy KS/CREW/1 (CLR Key Site) with a residual of 45 additional dwellings. Paragraph 6.64 of the Proposed Submission Local Plan 2006-2028 explains that, unlike the other Market Towns, Crewkerne does not have a Direction of Growth as</p>

		<p>the location has been predetermined by the planning permission for the CLR development which is recognised in emerging Policy HG1: Strategic Housing Site.</p> <p>This approach to development in Crewkerne is explained in further detail in South Somerset District Council's response to the Inspector's Examination Issue 8: Crewkerne (April 2013). Consequently it is not considered appropriate to include within the scope of the proposed Main Modification.</p> <p>Recommendation: Suggest 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>
4	<p>Greater clarity should be provided on the direction of new housing, specifically in Crewkerne, to better reflect paragraph 186 of the NPPF. The employment allocation should be designated as mixed use, and further housing to the north of the A30 should be restricted.</p>	<p>See response above.</p> <p>Recommendation: No change to Policy SS5</p>
5	<p>Believe that Modifications do not go far enough and that the Local Plan should provide more detail on the form, scale, access, and quantum of development. Local Plan should go further and specifically 'allocate' the Canal Way site to provide certainty and comply with Para 154 of NPPF.</p>	<p>The Proposed Submission Local Plan 2006-2028 [CD 3a] makes it clear that a Site Allocations Development Plan Document will be produced for the Market Towns (including Ilminster) and Rural Centres. The timescales for this are set out in the Local Development Scheme 2013-2016 [CD 27]. Proposed Main Modification 3 proposes a modification to emerging Policy PMT3: Ilminster Direction of Growth, identifying a strategic Direction of Growth to the west of the town (Canal Way). Given the permissive approach advocated by PMM5 it is considered that the requirements of paragraph of 154 of the NPPF are met.</p> <p>Recommendation: No change to Policy SS5</p>
6	<p>Object - wording for PMM5 should include: "...when considering housing proposals in sustainable and appropriate locations throughout the district but primarily focused on the Market Towns".</p>	<p>PMM5 provides clarification on the Council's approach towards development in the Directions of Growth in Market Towns and in Rural Centres prior to the Site Allocations Development Plan Document being adopted. The approach focuses on the delivery of sustainable levels of growth within the context of the emerging settlement hierarchy. It is therefore not considered appropriate to amend the Policy SS5 as suggested as it seeks to apply the permissive approach district wide which would be contrary to the emerging settlement hierarchy.</p>

		Recommendation: No change to Policy SS5
7	Permissive approach does not give enough clarity of certainty to the development industry or community – requires additional guidance on design standards and infrastructure requirements.	<p>The Infrastructure Plan, January 2012 [CD 36] identifies the infrastructure requirements for the district. The Infrastructure Plan is a ‘living’ document and will be periodically updated and reviewed over the plan period. The infrastructure needs of specific developments will also be considered as part of the Development Management process for individual planning applications in light of emerging Local Plan Policy SS6. Subject to the adoption of the emerging Local Plan, the Council will finalise its plans for a Community Infrastructure Levy in the District, which will assist in managing the delivery of necessary infrastructure.</p> <p>Design is addressed by the Development Management process through emerging Policy EQ2: General Development and by saved adopted Local Plan Policy ST6: The Quality of Development. With regard to the Proposed Yeovil Sustainable Urban extensions these issues will also be addressed through the masterplanning process.</p> <p>Recommendation: No change to Policy SS5</p>
8	Wincanton growth fails to account for settlements housing need. Wincanton already sustainable with high levels of employment. Uptake of 85 houses by MOD undermines need to constrain housing as they will be employed by MOD. Not clear why the additional 350 dwellings proposed in 2010 not carried forward. Wincanton allocated just 4% of District's housing requirement, yet is the 4th largest settlement & 3rd largest employment market. Wincanton provides 2,900 jobs, employment density greater than 1, self-containment greater than 50%. Should not be limited on economic grounds. 14.4% growth in rural housing is an unsustainable strategy. Will lead to population displacement, increased rural isolation & car use. Higher housing levels for Wincanton not tested as part of evidence base or in SA. The IP 2012 does not identify any issues to limit Wincanton.	<p>Noted. However, the approach to the delivery and scale of growth at Wincanton is discussed in detail in South Somerset District Council's response to the Inspector's Examination Issue 10, Wincanton (April 2013). PMM5 does not address the overall scale of growth at Wincanton.</p> <p>Recommendation: No change to Policy SS5</p>
Rural Centres		

Comment / Issue		SSDC Response
1	Proposed Main Modification does not provide sufficient protection to limit development to the target scales due to the current lack of 5 year housing land supply. Stronger set of criteria is required to aid Planning Committees in their decision making. Already seen approvals in Martock taking the numbers 40 over the target.	<p>The proposed additional text is clear that the overall scale of growth set out in emerging Policy SS5 “will be a key consideration”. The overall district –wide target of 15,950 dwellings is an “at least” figure (emphasis added).</p> <p>Paragraph 49 of the NPPF is clear that proposals for housing development “... should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.”</p> <p>Whilst the Local Planning Authority is not currently able to demonstrate a five-year supply of deliverable housing sites, planning applications must be considered in the context of the presumption in favour of sustainable development set out in paragraph 14 of the NPPF this means permission should be granted unless:</p> <ul style="list-style-type: none"> - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits; or - specific policies in the NPPF indicate development should be restricted. <p>This is a matter to be addressed through the Development Management process. Recommendation: No change to Policy SS5</p>
2	Approach could lead to development outside of Rural Centres justifying development based on larger settlements need circumventing important protection for the countryside. This should be amended to: "The same key considerations should also apply when considering housing proposals wherever located within Rural Centres".	<p>The text proposed to be added to Policy SS5 makes it clear that the same considerations should “... apply when considering housing proposals (wherever located) adjacent to Rural Centres.” 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. Recommendation: No change to Policy SS5</p>
General		
Comment / Issue		SSDC Response
1	To meet Government demands SSDC is trying to	Comment noted. However, this relates to national planning policy and the overall

	force too many properties on Yeovil, Market Towns and Rural Centres too quickly - causing resentment by the local populations. Infrastructure cannot cope.	strategy the in the emerging Local Plan rather than PMM5. Recommendation: No change to Policy SS5
2	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.	<p>Agreed. It is accepted that paragraph 2.14 of the Proposed Main Modifications Consultation Document, November 2013 clearly states that the permissive approach recommended by PMM5 will apply to the two proposed Sustainable Urban Extensions at Yeovil therefore PMM5 should be amended to make an explicit reference to Yeovil. For consistency the same amendment should also be made to PMM6.</p> <p>Recommendation: Amend PMM5 and Policy SS5 and Policy SS3 as follows: Paragraph 4.103: "...whilst not detracting from the delivery of appropriate levels of growth in <u>Yeovil (including the SUEs)</u>, all the market towns and rural centres..."</p> <p>Amend Policy SS5: "...proposals in 'directions of growth' at <u>Yeovil (including the SUEs)</u>, and the Market Towns."</p> <p>It should be noted that this will result in a consequential amendment to PMM6 as follows: Paragraph 4.63: "...whilst not detracting from the delivery of appropriate levels of growth in <u>Yeovil (including the SUEs)</u>, all the market towns and rural centres..."</p> <p>Amend Policy SS3: "...proposals in 'directions of growth' at <u>Yeovil (including the SUEs)</u>, and the Market Towns."</p>
3	Would like to see village of East Coker planned as a Rural Centre and planned more positively.	<p>Noted. However, PMM5 does not address the status of settlements within the emerging Local Plan. In the context of the emerging Local Plan development proposals in the settlement of East Coker are considered under emerging Policy SS2: Development in Rural Settlements. East Coker has a designated Neighbourhood Area and is in the process of producing a Neighbourhood Plan, a positive approach to development can be taken through that process.</p> <p>Recommendation: No change to Policy SS5</p>
4	Support the use of an interim policy, but remain concerned that the Council's inability to demonstrate	<p>Noted. South Somerset District Council is working positively towards being able to demonstrate a five-year supply of deliverable housing sites.</p>

	a 5 year housing land supply will render this exercise meaningless, highlighting the requirement that the Council must identify a deliverable 5 year housing land supply.	Recommendation: No change to Policy SS5
5	The Site Allocations Document will not be adopted by May 2015. In such circumstances consider that the Council will not be able to demonstrate a 5 year supply of deliverable sites.	South Somerset District Council will seek to meet the time scales set out in the Local Development Scheme 2013-2016 [CD 27] including adoption of the Site Allocations Document by May 2015. South Somerset District Council will keep the Local Development Scheme under review, and subject to the adoption of the Local Plan, will identify work priorities to ensure that the site specific supporting work is delivered within an appropriate timescale to ensure a robust and implementable policy framework. Recommendation: No change to Policy SS5

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

Market Towns		
Comment / Issue		SSDC Response
	No issues raised	
Rural Centres		
Comment / Issue		SSDC Response
1	Object to the permissive approach being applied to Rural Centres as it is not necessary and could lead to development in the open countryside or Rural Settlements. Sites should be identified in development plan documents. Amend to read "...proposals within the settlement boundaries of Rural Centres."	<p>The text proposed to be added to Policy SS3 makes it clear that the same considerations should "... apply when considering housing proposals (wherever located) adjacent to Rural Centres." 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.</p> <p>Recommendation: No change to Policy</p>
General		
Comment / Issue		SSDC Response
1	Support the identification of criteria upon which to assess development proposals for employment land prior to the adoption of the Site Allocations DPD.	<p>Support noted.</p> <p>Recommendation: No change to Policy</p>

See recommended change to PMM5 also proposed to be applied to PMM6.

Point of Clarification 2: Wincanton Housing. Proposed Main Modification 7

Wincanton		
Comment / Issue		SSDC Response
1	PMM7 still does not overcome the need for additional housing in Wincanton over the plan period. Promotion of land at Windmill Farm, Grants Lane.	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. Recommendation: No change to PMM7 or Policy SS3 or SS5
2	It should be made clear that the potential additional housing should be linked to, and underpinned by, local employment growth in the town, rather than employment growth in general. This is to ensure that car-based commuting along the A303 is minimised. Suggest minor change to text.	Comment noted. Recommendation: Consider making a minor amendment to text to reflect desire to ensure Wincanton becomes more self-contained.
3	There should be a five year moratorium on additional major housing proposals as existing proposals have not yet been built out and to rebalance the work/living lifestyle.	Comment noted. PMM7 proposes to monitor the housing market and employment growth within Wincanton and is clear that should additional housing provision be needed this would be achieved through a specific statutory Local Plan amendment. It is anticipated that this need will not arise in the short term whilst the town undergoes a period of assimilation following delivery of existing commitments. Recommendation: No change to PMM7 or Policy SS3 or SS5
4	Disagree that the additional text addresses the significant issue of longer term development needs of Wincanton. Proposed change - amend the Direction of Growth to include a mixed use scheme as opposed to employment only, allowing additional housing and allowing essential infrastructure to become viable. Additionally, Wincanton requires the identification of specific indicators to illustrate how Wincanton's housing need and demand will be assessed through	The approach to the delivery and scale of growth at Wincanton is discussed in detail in South Somerset District Council's response to the Inspector's Examination Issue 10, Wincanton (April 2013). The identification of the Direction of Growth for mixed use would not be in line with the District Council's agreed approach at Wincanton. 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. 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

	monitoring, District-wide indicators are not sufficient.	amendment would be made including consideration of the options available at that time. Recommendation: No change to PMM7 or Policy SS3 or SS5
5	703 dwellings is inadequate. Sites and permissions were on the whole planned to meet the housing needs identified in the previous local plan and should not now be double-counted to present a distorted view.	The allocations that have been saved and carried forward from the previously adopted Local Plan have been done so because they were not delivered during that plan period, this could have been for a number of reasons e.g. economic climate or market capacity. There is no element of double counting as they have not been delivered. Recommendation: No change to PMM7 or Policy SS3 or SS5
7	Object - As Wincanton is well served by sustainable transport options and therefore offers a sustainable location for housing growth.	The approach to the delivery and scale of growth at Wincanton is discussed in detail in South Somerset District Council's response the Inspector's Examination Issue 10, Wincanton (April 2013). Sustainable transport provision was considered as part of the South Somerset Role and Function Study Final Report April 2009 [CD 34] and the document does identify that Wincanton has a number of public transport opportunities (Table 5.4) this was taken into account when considering the strategic approach to housing growth at Wincanton. Recommendation: No change to PMM7 or Policy SS3 or SS5
8	Object - Strongly advise that Wincanton's housing growth be revisited and a direction of growth be identified to the north-west of the town as per the Draft Core Strategy (2010).	The approach to the delivery and scale of growth at Wincanton is discussed in detail in South Somerset District Council's response the Inspector's Examination Issue 10, Wincanton, April 2013. PMM7 makes it clear that the Council will monitor housing growth in Wincanton and take appropriate action to supplement housing provision where required. Recommendation: No change to PMM7 or Policy SS3 or SS5
9	Object - Strongly to the on-going monitoring approach for Wincanton's housing growth. It is not a credible solution. No such imbalance between jobs and housing. And mechanism proposed is unworkable and includes no trigger or criteria to bring about a robust review.	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. Recommendation: No change to PMM7 or Policy SS3 or SS5
10	Proposed Main Modification fails to address the shortcomings of the plan's soundness in terms of providing future flexibility for housing development in Wincanton. Section 13 of the Local Plan already deals with the need to review if housing demand	The approach to the delivery and scale of growth at Wincanton is discussed in detail in South Somerset District Council's response to the Inspector's Examination Issue 10, Wincanton (April 2013). The identification of the Direction of Growth for mixed use would not be in line with the District Council's agreed approach at Wincanton. PMM7 introduces additional text to allow housing provision in

	<p>outstrips planning housing provision therefore PMM7 is not necessary. This retrospective approach does not comply with the NPPF requirement for positively seeking opportunities for development needs, nor does it result in a positively prepared plan. The amendments introduce a negative approach. This would introduce ineffective guidance for long-term housing planning in Wincanton. Wincanton Direction of Growth should be re-categorised as mixed-use rather than employment alone - would be in accord with NPPF (para 17), provide greater flexibility for growth and allow integration of residential and commercial use. Suggested amendments to paras 6.94, 6.100 and PMT4 provided.</p>	<p>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. This approach offers flexibility.</p> <p>Recommendation: No change to PMM7 or Policy SS3 or SS5</p>
11	<p>Wincanton has had virtually the whole housing allocation front loaded which has caused documented problems as the town grew too quickly with no plans in place for additional employment. Accepted that by 2022 it is reasonable to re-examine the housing requirements for the town.</p>	<p>Comment noted.</p> <p>Recommendation: No change to PMM7 or Policy SS3 or SS5</p>
12	<p>No evidence exists to back up the Local Plan's approach to housing growth in Wincanton. Amended wording is equivocal and of no assistance to proper planning for the town over the plan period. Approach attempts to paper over the cracks in the strategy. Contend that land at Dancing Lane should form part of the positive approach to town planning (plan attached to representation).</p>	<p>The Proposed Submission Local Plan 2006-2028 is supported by an extensive evidence base, which is available for review on South Somerset District Council's web site: www.southsomerset.gov.uk.</p> <p>The approach to the delivery and scale of growth at Wincanton is discussed in detail in South Somerset District Council's response to the Inspector's Examination Issue 10, Wincanton (April 2013). PMM7 offers a mechanism by which the Council will monitor housing growth in Wincanton and take appropriate action to supplement housing provision where required. 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</p>

		time. Recommendation: No change to PMM7 or Policy SS3 or SS5
13	A Roman Villa is located at New Barns Farm so there is potential for assets related to the villa and possible earlier Iron Age activity within the proposal area. Site should be fully archaeologically assessed as part of a masterplan stage and the results used to inform mitigation – this should take place before any planning applications/ mastepans being determined. Application should include detailed archaeological mitigation strategy. Community engagement programmes should accompany archaeological investigations where appropriate.	Noted. This relates to the Wincanton Direction for Growth and can be addressed through the Development Management process. Recommendation: No change to PMM7 or Policy SS3 or SS5

Gypsy and Traveller Needs Assessment Update. Proposed Main Modification 8

Gypsy and Traveller Needs Assessment Update		SSDC Response
Comment / Issue		
1	Principles of Climate Change Policy EQ1 should prevent inappropriate development being located in Flood Risk areas through the application of the NPPF's Sequential Test.	Noted. In addition to emerging Local Plan Policy EQ1 emerging 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> . Recommendation: No change to PMM8 or Policy HG7

Point of Clarification 3: Reference to Non-Statutory Documents

Non-Statutory Documents		
Comment / Issue		SSDC Response
1	Support Inspector's recommendation that non-statutory documents such as the Chard Implementation Plan (2010) should not form part of the Statutory Development Plan.	Support noted. Recommendation: No change to Policy
2	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. Recommendation: No change to Policy
3	It is premature to promote changes to PMT2 as this may need to be reworded when the Plan Examination process considers major housing locational issues – PMT1 may have to be amended.	The Proposed Minor Modification to Policy PMT2 (M93) addresses the Inspector's Point for Clarification raised in paragraph 65 of his Preliminary Findings of 3 rd July 2013. It is not appropriate to wait until the Inspector's final report is received before identifying this modification. Recommendation: No change to Policy

Other General Issues – Topic Specific

Other Issues		
Comment / Issue		SSSDC Response
1	Why has Yeovil been outsourced but Ilminster not - unfair	In light of the Inspector's comments in his Preliminary Findings letter of 3 rd July 2011, it was deemed that an independent assessment of options for Yeovil was required. Adequate in-house resource was available to carry out a re-appraisal of options at Ilminster. The revised Sustainability Appraisal for Ilminster was Quality Assurance checked by independent consultants Enfusion to ensure consistency. Recommendation: No change to PMMs or Policy
2	Object to strategic highway from Oaklands Drive to Chaffcombe Lane, ignoring the Peter Brett Traffic Management report.	This comment relates to proposals for development at Chard and is not the subject of any Proposed Main Modification. Recommendation: No change to PMMs or Policy
3	Object - as Templecombe, Henstridge, Stalbridge could be upgraded as settlements (together) to provide viable alternative in the east of the district. Henstridge should be upgraded to the status of Rural Settlement.	This comment does not relate to any of the Proposed Main Modifications. Emerging Local Plan Policy SS5: Delivering New Housing growth makes provision for 911 dwellings (in addition to existing commitments) in Rural Settlements such as Henstridge. Emerging Policy SS2: Development in Rural Settlements allows for market and affordable housing to meet local needs [CD 3a]. (NB. Stalbridge is in North Dorset District). Recommendation: No change to PMMs or Policy
4	Cars are necessary in such a rural area where public transport provision is poor. Should increase public parking to counter lack of off street parking spaces, and provide cycle ways between villages and towns.	This comment does not relate to any of the Proposed Main Modifications. The Transport Policies within the Emerging Local Plan [CD 3a] seek to reduce the need to travel by car and improve alternative means of travel such as walking and cycling. Recommendation: No change to PMMs or Policy
5	The plan does little to protect the agricultural history of the rural areas.	Noted. The NPPF seeks to protect the best and most versatile agricultural land and the Emerging Local Plan seeks to concentrate development in the most sustainable locations where there is existing housing, employment and community facilities. Recommendation: No change to PMMs or Policy
6	High design quality, open spaces, green routes and woodlands should be promoted.	Noted. Paragraphs 56-68 of the NPPF set a clear framework for promoting good design. Emerging Local Plan Policy EQ2: General Development complements this by setting the criteria against which local design will be considered. Emerging Policy EQ5: Green Infrastructure promotes the provision of green infrastructure and Policy EQ6: Woodland and Forests supports the implementation of the South West Woodland and Forestry Framework [CD 3a & c].

		Recommendation: No change to PMMs or Policy
7	Contributions from new development for health and well-being facilities should be site specific and provide facilities within the development town. The Sports Zone in Yeovil should be reassessed to ensure it provides the best facility for the district.	<p>Noted. Until such time as the Council has an adopted CIL, Section 106 planning obligations will be sought for infrastructure requirements including those related to health and well-being in accordance with statutory regulations and current Council procedure set out in the 'Development Control Protocol for identifying and prioritising contributions' adopted 15 June 2006 [CD 74].</p> <p>Emerging Local Plan Policy HW2: Sports Zone is not the subject of any of the Proposed Main Modifications [CD 3a].</p> <p>Recommendation: No change to PMMs or Policy</p>
8	Ensure there are sufficient single-bed dwellings as this is the largest growing demand, and provide affordable housing. Provide housing to meet needs of older people, integrated with accessible local services.	<p>Paragraph 50 of the NPPF expects local planning authorities to plan for a mix of housing based on current and future demographic and market trends that caters for the needs of the whole community including older people and those in housing need. Emerging Local Plan Policy HG5: Achieving a Mix of Market Housing takes this forward. Emerging Policy HG3: Provision of Affordable Housing sets an affordable housing target of 35%, this target is based on need and viability [CD 3a].</p> <p>Recommendation: No change to PMMs or Policy</p>
9	Objection to larger scale growth planned at Chard	<p>The Proposed Main Modifications do not propose any substantial changes to the overall scale of growth at Chard. Proposed Main Modification 1 sets out a clarification regarding the phasing of development and the difference between planned growth defined within the existing Local Plan, and growth planned for within the Emerging Local Plan.</p> <p>Other issues relating to Chard are addressed in South Somerset District Council's response to the Inspector's Examination Issue 7: Chard.</p> <p>Recommendation: No change to PMMs or Policy</p>
10	Policy SS5 does not encourage further privately funded development in many of South Somerset's villages - Sparkford could provide further development.	<p>This comment does not relate to any of the Proposed Main Modifications. Emerging Local Plan Policy SS5: Delivering New Housing growth makes provision for 911 dwellings (in addition to existing commitments) in Rural Settlements such as Sparkford.</p> <p>Emerging Local Plan Policy SS2: Development in Rural Settlements allows for market and affordable housing to meet local needs [CD 3a].</p> <p>Recommendation: No change to PMMs or Policy</p>
11	No comment to make.	Noted.

		Recommendation: No change to PMMs or Policy
12	On current trends new housing will largely benefit those who are seeking extra rooms and second homes. Most 'homeless' people will be unable to afford to buy a house - root cause in inequality. Need to stop encouraging people to be "consumers".	Noted. South Somerset District Council has existing policies and emerging policies which seek 35% affordable housing provision on qualifying sites. The NPPF supports the delivery of new housing. Recommendation: No change to PMMs or Policy

Other General Issues – Process of Consultation

Other Issues		
Comment / Issue	SSDC Response	
1	Not clear where to access the documents in the footnotes on the iNovem system	Documents in the footnotes of the Proposed Main Modifications Consultation Document, November 2013 can be accessed from the iNovem system (online consultation software) by clicking on the footnote Recommendation: No change to PMMs or Policy
2	Wished to make a contribution to the future development of Yeovil but find the consultation documents impossible to make sense of.	Noted. Local Plan production requires a large quantity of supporting evidence, which is often very technical in order to comply with the national and European legal framework. South Somerset District Council has ensured that consultation documents were widely available, complying with our adopted Statement of Community Involvement document. Documents have been placed in Council Offices, on the internet and in libraries. Informal drop-in sessions were held during the consultation period for residents to access information and discuss the Proposed Main Modifications. Recommendation: No change to PMMs or Policy
3	The document is difficult to read and should have been translated into an easy to read document with a simple method for people to respond.	Noted. Non-technical summaries of reports and documents have been produced where necessary. Where possible documents are written in plain English and content is summarised where possible. Recommendation: No change to PMMs or Policy
4	Consultation process is flawed and not legally compliant - form is confusing and not easy to understand. The event on December 4th was not conducted properly, did not follow national	The consultation process was carried out in accordance with the decision-making processes of the District Council. The Town and Country Planning (Local Planning) (England) Regulations 2012 do not specify a particular procedure for consultation at this stage of the Local Plan process. The Inspector in his letter to the District

	<p>guidelines, officers gave misleading information.</p>	<p>Council (dated 17th July 2013) stated the following: <i>“My understanding is that all the main changes that are being proposed by the Council would be available for comment. This would seem to be a logical approach, even though representors may have a ‘second bite at the cherry’ when any Main Modifications are published, following resumed hearing sessions (which at this stage I am assuming will be required).”</i></p> <p>The consultation response form is based on a Department of Communities and Local Government template. It was made clear to respondents that comments would be accepted via the iNovem online consultation system, email, letter or fax and that it was not compulsory to use the comments form.</p> <p>The event on 4th December was an informal drop-in session and due to the high level of interest from the residents of Ilminster, at the request of the Town Council, a second drop-in session was held on 6th January 2014.</p> <p>Recommendation: No change to PMMs or Policy</p>
5	<p>Not sufficient time given for the consultation process given the Christmas period.</p>	<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 do not specify a particular procedure for consultation at this stage of the Local Plan process.</p> <p>The Council were aware that the consultation period would be taking place over the holiday period, but this was agreed with the Local Plan Inspector through the project plan timetable.</p> <p>Recommendation: No change to PMMs or Policy</p>
6	<p>SSDC IT system is failing, cannot view consultation documents.</p>	<p>The District Council are not aware of any technical issues associated with accessing the iNovem system (online consultation software) during the consultation period.</p> <p>Recommendation: No change to PMMs or Policy</p>