

South Somerset District Council – Analysis of responses from Specific Consultation Bodies and Prescribed Bodies

The following tables set out the main issues that have arisen from the responses received from Specific Consultation Bodies and Prescribed Bodies during the consultation process for the Proposed Main Modifications to the South Somerset Local Plan (2006-2028).

Specific Consultation Bodies are those listed in Appendix 2 of the adopted South Somerset District Council Statement of Community Involvement, July 2007 (SCI). Prescribed Bodies relate to the ‘Duty to Co-operate’ (DTC) which became a legal requirement under the provisions of the Localism Act. In essence DTC requires all local planning authorities such as South Somerset to co-operate on strategic matters with neighbouring authorities and other Prescribed Bodies, to maximise their effectiveness when preparing the Local Plan.

The following tables provide a non-technical summary of the responses received and whether South Somerset District Council proposes a change as a result of the representation¹. These tables are linked to the more detailed analysis of consultation responses to the Proposed Main Modifications, which can be found here: [https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/local-plan-2006-2028/local-plan-\(formerly-core-strategy\)-project-management-board-reports/pmb-24-february-2014/](https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/local-plan-2006-2028/local-plan-(formerly-core-strategy)-project-management-board-reports/pmb-24-february-2014/)

Respondents:

Dorset County Council

	Issue/s	South Somerset District Council response
1	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 there will be landscape impacts, the Landscape Addendum to the Yeovil Peripheral Landscape Study (August 2013) identifies that there is capacity for mitigation. It should be noted that there is no Special Landscape Feature designation. Recommendation: No change to Policy YV1, YV2 or SS5.
2	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. Masterplanning and mitigation through as and when a planning application is forthcoming will resolve this issue.

¹ South West Water responded by stating that they had no comment to make.

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		Recommendation: No change to Policy YV1, YV2 or SS5
3	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.	Noted. Several parts of the A30 have been modelled for the future traffic impact, along with the key junctions. ² The growth scenario in the 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. Recommendation: No change to PMM2, or Policy YV2 or YV6.
4	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.	Education Authority has stated that there is sufficient capacity to accommodate growth in Yeovil, and that no further capital expenditure is currently planned. Work is required to more thoroughly understand the issues and options for delivering a secondary school in Yeovil. Recommendation: No change to PMM2, or Policy YV2 or YV6

Somerset County Council

	Issue/s	South Somerset District Council response
1	Archaeology 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 confirm that impacts on historic environment can be mitigated and that the inter-relationship between Upper Mudford and the 'shrunken 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.

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

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2	<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>Archaeological impacts are integral to the Yeovil Strategic Growth Options SA report. 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. 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>
3	<p>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.</p>	<p>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.</p>
4	<p>Highways The revised proposals can no longer deliver 50% of travel originating from the development by non-car modes – the previous approach of 2,500 dwellings and employment land was a much better match to achieve this. The deletion of a secondary school will have a significant impact on vehicular trips external to the development. 35-40% is more realistic.</p>	<p>Noted. A change is necessary to the non-car travel requirement in Policy YV6 to reflect the fact that development will be delivered across two Sustainable Urban Extensions. The recently completed Parsons Brinckerhoff traffic modelling work (See Appendix B) has highlighted that the revised scale and location of growth do not have a detrimental impact on the local or strategic highway. However, there is little evidence to support a strict policy in order to deliver at least 50% of travel by non-car modes. In conjunction with the evidence provided by SCC and the Highways Agency it would be appropriate to reconsider the wording of Policy YV6. In terms of the impact of the removal of the secondary school, the Council contends that the scale of growth does not justify a new secondary school (and existing school capacity can accommodate growth). Therefore, transport</p>

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		<p>impacts will have to be managed through a whole town network approach, utilising other Local Plan policies, such as TA1, TA3, TA4, and TA5. The Parsons Brinckerhoff report (Appendix B) demonstrates that the impact of delivery at two sites <i>“on the key junctions are generally small”</i>. Whereas where the modelling shows development is <i>“concentrated in full at one site, the impacts on the key junctions is generally higher”</i>.</p> <p>Recommendation: Change to Policy YV6.</p>
5	<p>Education The overall housing numbers in Yeovil will result in the existing secondary schools having insufficient capacity and there remains a need for a new additional secondary school site at some point. The division into two urban extensions means that neither have the critical mass to support such a site, so detailed studies are required to inform where a new secondary school would be most sustainable and deliverable, and when this becomes critical. A policy should be included to secure the S. 106 and CIL contributions necessary.</p>	<p>Agree that further work on secondary school provision is required. The supporting text in the proposed main modifications (para 2.13) states contributions will be sought for secondary school provision, but agree that this should 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 <i>“including Early Years, Primary and Secondary educational provision”</i>.</p>
6	Support proposed revised Direction of Growth, Ilminster.	<p>Noted.</p> <p>Recommendation: No change.</p>
7	<p>Public Health Attracting new business key aspect of any development. Good to see new employment land net increase.</p>	<p>Noted.</p> <p>Recommendation: No change.</p>

West Dorset District Council / Weymouth & Portland Borough Council

	Issue/s	South Somerset District Council response
1	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.	See answer 2 in Dorset County Council response. Recommendation: No change.
2	All options have the potential to exacerbate current congestion issues.	Noted. The latest traffic modelling does show some increases in congestion. However, this is predominantly due to background traffic growth from existing development in Yeovil. 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
3	Strongly support decision not to progress Area 'C' – Middle Yeo and Dorset Hillsides – due to severance from the town and the potential cost of mitigating this. 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.	Noted. Area 'C' is not proposed for a direction of growth. Recommendation: No change to PMM2, or Policy YV2 or YV6
4	Wish to continue co-operative working with the Council on the proposals, in particular regarding infrastructure requirements and mitigation of impacts through masterplanning.	Noted and welcomed. Recommendation: No change.

English Heritage

	Issue/s	South Somerset District Council response
1	The proposed Modifications have addressed the points raised and as such have no outstanding objections. Advise that careful note is taken of the County Archaeologists comments on the Modifications. Support these comments and they should inform the more detailed work that will need to be undertaken in later development phases.	Noted. Senior Archaeology Officer at Somerset County Council has been heavily involved in SA process and will be involved in detailed mitigation strategy for development at SUEs. Recommendation: No change.

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Environment Agency

	Issue/s	South Somerset District Council response
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. Recommendation: No change.
2	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.	Noted. South Somerset District Council will work with applicants to undertake a Flood Risk Management Strategy as part of the masterplanning and site delivery. Recommendation: No change to Policy YV1, YV2 or SS5.
3	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 scheme (SuDS). The SuDS scheme must maximise the environmental benefits to be in accord with policies EQ1 and EQ5.	Noted. South Somerset District Council will work with applicants to undertake a Flood Risk Management Strategy as part of the masterplanning and site delivery. Recommendation: No change to Policy YV1, YV2 or SS5.
4	Support residential development in Canal Way but recognise that there are known flood issues in the vicinity, principally associated with surface water flooding which SSDC drainage engineers should lead on.	Noted. This issue has been included in the SA of options for growth in Ilminster. Recommendation: No change.
5	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 (Gypsy, Travellers and Travelling Showpeople Policy).	Noted. Recommendation: No change.

Highways Agency

	Issue/s	South Somerset District Council response
1	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 ³ shows very limited impact on Cartgate roundabout from the SUEs, with the reference case already showing it is forecast to be over capacity in AM and PM peaks. There is negligible impact on traffic flows along the A359 Mudford Hill compared with the reference case. Further discussions with SCC and the Highways Agency have confirmed that the impacts on Hazelgrove roundabout are not significant. Recommendation: No change to PMM2, or Policy YV2 or YV6
2	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.	Noted. Agree a change is required to the non-car mode share requirement in Policy YV6. Recommendation: Change to Policy YV6. Continue work in conjunction with Somerset County Council and Highways Agency to inform a realistic level of non-car travel in policy YV6.
3	Evidence should be prepared to assess the import of the proposed development on the operation of the Southfields roundabout.	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 not raised concerns regarding the local highway network impacts of the proposed Direction of Growth at Canal Way. Recommendation: No change to PMM3 or Policy PMT3.
4	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.	Noted. Recommendation: Minor text amendment to PMM7.

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

Natural England

	Issue/s	South Somerset District Council response
1	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 recommended as a result of this comment.

Wessex Water

	Issue/s	South Somerset District Council response
1	Note the revised areas of growth and the amended scope of residential units and employment land affecting Yeovil, Ilminster, Chard and Wincanton. 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.	Noted. The masterplanning and Development Management processes will address this issue. Recommendation: No change.

Barwick and Stoford Parish Council

	Issue/s	South Somerset District Council response
1	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.	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 Statements ⁴ define "poorer quality" agricultural land as grades 3b, 4 and 5. The Council has sought to refine the SUE at Coker and the reduced scale of growth will reduce the impact on

⁴ Overarching NPS for Energy, DECC, July 2011; Hazardous Waste NPS, DEFRA, June 2013; draft NPS for National Networks, December 2013.

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		<p>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).</p> <p>Unsure of the source that 5% of land is grade 1 – Natural England (TIN049, Dec 2012) estimate that grades 1 and 2 together form around 21% of all farmland in England, and grade 3a also covers around 21%.</p> <p>Recommendation: No change to Policy YV1, YV2, or SS5</p>
2	<p>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.</p>	<p>Noted. Flood risk has been considered as part of the SA of growth options in Yeovil.</p> <p>Recommendation: No change.</p>

Bruton Town Council

	Issue/s	South Somerset District Council response
1	<p>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.)</p>	<p>Durslade Farm 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.</p> <p>Recommendation: No change.</p>

Brympton Parish Council

	Issue/s	South Somerset District Council response
1	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.	Noted. Flood risk has been considered as part of the SA of growth options in Yeovil. Mitigation will be delivered through the Development Management process. Recommendation: No change.
2	The development of one site would limit the landscape impact to one area – the north has seen lots of development in recent years, whilst the south has remained untouched.	Landscape issues have been considered as part of the SA of growth options in Yeovil and have been a key consideration in reaching the conclusion for two SUEs. Recommendation: No change.
3	The southern option has the advantage of being close to the train stations, the town centre, AgustaWestlands, Lynx Trading Estate.	Noted. Proximity to services/employment has been considered as part of the SA of growth options in Yeovil. Recommendation: No change.
4	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 Agreements and masterplanning.	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 could not be improved to accommodate demand from an urban extension.” Recommendation: No change to Policy YV1, YV2, YV6 or SS5

Brympton / Chilthorne Domer /Mudford / Tintinhull and Yeovil Without Parish Councils (joint representation)

	Issue/s	South Somerset District Council response
1	The Inspector's preliminary findings on landscape are at variance with the 2003 Inspector. Just because Wyndham Park has breached the skyline does not 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.	Earlier Local Plan Inquiry (2003) comments were given in response to specific development proposals objecting to Council allocations. The baseline is now changed, with sites considered via the evidence base provided by the Yeovil Peripheral Landscape Study and Landscape Addendum. Any planning application for development will be expected to provide sufficient landscape mitigation. Recommendation: No change to Policy YV1, YV2 or SS5
2	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.	Noted. Flood risk has been considered as part of the SA of growth options in Yeovil. Mitigation will be delivered through the Development Management process. Recommendation: No change.
3	A new roundabout would be required on Mudford Road to access the site.	Noted. Appropriate mitigation will be delivered through the Development Management process. Recommendation: No change.
4	There is a lack of evidence regarding current and predicted traffic volumes across the north of Yeovil.	Traffic modelling work has been undertaken, showing that the two SUEs in Yeovil will not have a significant impact on the highway network. Recommendation: No change
5	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	See answer 4 to Brympton Parish Council Recommendation: No change to Policy YV1, YV2, YV6 or SS5

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	involved in the outline planning approval, S106 Agreements and masterplanning.	
6	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– improved access to employment, housing, community facilities should benefit deprived wards. ⁵ Recommendation: No change.
7	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 SUE. Recommendation: No change to Policy YV1, YV2, or SS5
8	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. Recommendation: No change to Policy YV1, YV2, or SS5
9	Northern parishes supported the original Local Plan when 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
10	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.
11	Latest recommendation for development at Primrose Lane appears to represent appeasement in the face of the wealth of East Coker and a sacrifice of the northern parishes in the interests of getting the Local Plan	Noted. See answer to point 9 above. Recommendation: No change.

⁵ Appendix II (pg 19), Strategic Growth Options for Yeovil SA report, October 2013.

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	approved. Approach seems to be to deprive that community of a sustainable economy with necessary housing, employment and community facilities.	
12	It is important to create a top quality environment including better quality housing and leisure facilities - need for better quality housing should be negotiated with developers.	Noted. Detailed design will be considered through the Development Management process. Recommendation: No change
13	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 Yeovil to take their share of development and "round off" the town.	Noted. See answer to point 9 above. Recommendation: No change.
14	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.	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 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.
15	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.	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. ⁶ Recommendation: No change to Policy YV1, YV2, or SS5
16	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. Also need assurance that sufficient tertiary education places are available.	Noted. See answer to point 15 above. Recommendation: No change to Policy YV1, YV2, or SS5
17	The Inspector's preliminary findings do not state that the SUE should not be	Noted. See answer to point 9 above.

⁶ Somerset School Organisation Plan 2013.

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	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 is particularly relevant.	Recommendation: No change.
18	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.	Noted. See answer to point 9 above. Recommendation: No change.

Chilthorne Domer Parish Council

	Issue/s	South Somerset District Council response
1	Appears that housing numbers have been reduced from 2,500 to 1,565 as southern location is the only option capable of accommodating 2,500 dwellings. Generally accepted that the worst case scenario would be the ‘necklace’ solution which would result in a large number of dwellings without the necessary suitable and adequate infrastructure. However, necklace situation already exists around the north of Yeovil with the existing key sites. Situation would be exacerbated by the two site urban extension option.	Noted. See answer to point 9 in Brympton / Chilthorne Domer /Mudford / Tintinhull and Yeovil Without Parish Councils (joint representation). Recommendation: No change.

Donyatt Parish Council

	Issue/s	South Somerset District Council response
1	Re-iterate objections made in 2010 with regard to development at Canal Way, Ilminster: threat of incorporation of Donyatt into ‘greater Ilminster’, unsuitability of Park Lane as a ‘rat-run’ if connected to any new development.	Noted. The Direction of Growth at Canal Way is based upon a robust SA of potential growth options. Recommendation: No change.

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East Coker Parish Council

	Issue/s	South Somerset District Council response
1	<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>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.</p> <p>The Inspector, in his letter of the 28th January 2014, has reiterated 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> <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</p>

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		<p>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.</p> <p>Recommendation: No change.</p>
2	<p>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>	<p>See answer to point 1 for Barwick and Stoford Parish Council.</p> <p>Recommendation: No change.</p>
3	<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>See answer to point 1 for Brympton / Chilthorne Domer /Mudford / Tintinhull and Yeovil Without Parish Councils (joint representation)</p> <p>Recommendation: No change.</p>
4	<p>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.</p>	<p>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.</p> <p>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.</p> <p>Recommendation: No change.</p>

Iminster Town Council

	Issue/s	South Somerset District Council response
1	<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 Canal Way, but focus is on medical centre. Road at Shudrick will make access to 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. Iminster 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.</p> <p>Objective 9 - skirt of development along Canal Way should score the site more negatively.</p>	<p>The Council has noted the representations on the Sustainability Appraisal in relation to Iminster's proposed Direction of Growth.</p> <p>Having considered the points raised the following amendments to the Sustainability Appraisal of options is proposed:</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>Recommended Change to SA. Objective 8. Shudrick Valley change from '++ / -' to '+ / -' and change supporting text. No change to PMM3 or Policy PMT3.</p> <p>Recommended Change to SA. Objective 10 - Canal Way change from '0' to '-' and change supporting text. No change to Policy PMT3.</p>

PROPOSED MAIN MODIFICATION - SPECIFIC CONSULATION BODIES AND PRESCRIBED BODIES

<p>Objective 10 - scoring fails to take into account that Canal Way contains medieval Deer Park and Stone Age and Roman remains Canal Way abuts the only surviving part of the Chard to Ilminster canal, development could impact upon this. "The Stop Way Line" is located along Canal Way option. Herne Hill gifted to Town Council for residents of Ilminster.</p>	
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Lopen Parish Council

	Issue/s	South Somerset District Council response
1	<p>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 SSSDC 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>	<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</p>

PROPOSED MAIN MODIFICATION - SPECIFIC CONSULTATION BODIES AND PRESCRIBED BODIES

		of additional employment land will be made alongside the wider Local Plan policy framework, including Policy SD1, Policy SS1, and Policy SS3. Recommendation: No change.
2	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.	Noted. 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.
3	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.	See answer to point 1 above. Recommendation: No change.
4	Should establish the actual size of Lopen Head development and adjust the figures for Rural Settlements accordingly. Re-visit figures filtering miss-accounting of provision.	See answer to point 1 above. Recommendation: No change.

Martock Parish Council

	Issue/s	South Somerset District Council response
1	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.
2	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.	Noted. The Local Plan established a proactive strategy for facilitating growth and investment. The Council is working collaboratively with partners and the development industry to establish a five-year land supply. Recommendation: No change.

Marston Magna Parish Council

	Issue/s	South Somerset District Council response
1	A359 already has traffic problems 765 new dwellings would substantially increase traffic needing to access the A303.	Noted. The latest traffic modelling demonstrates that the two SUEs will not have a significant impact on the highway network. The Highways Agency is satisfied that impacts on the A303 are not significant. 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
2	Concerned regarding impact of flooding on Marston Magna.	Noted. Flood risk is included in the SA of options for growth options in Yeovil. Recommendation: No change.

Mudford Parish Council

	Issue/s	South Somerset District Council response
1	Appears that housing numbers have been reduced from 2,500 to 1,565 as southern location is the only option capable of accommodating 2,500 dwellings. Generally accepted that the worst case scenario would be the 'necklace' solution which would result in a large number of dwellings without the necessary suitable and adequate infrastructure. However, necklace situation already exists around the north of Yeovil with the existing key sites. Situation would be exacerbated by the two site urban extension option.	Noted. See answer to point 1 in Chilthorne Domer Parish Council Recommendation: No change.

Tintinhull Parish Council

	Issue/s	South Somerset District Council response
1	Appears that housing numbers have been reduced from 2,500 to 1,565 as southern location is the only option capable of accommodating 2,500 dwellings. Generally accepted that the worst case scenario would be the 'necklace' solution which would result in a large number of dwellings without the necessary suitable and adequate infrastructure. However, necklace situation already exists around the north of Yeovil with the existing key sites. Situation would be exacerbated by the two site urban extension option.	Noted. See answer to point 1 in Mudford Parish Council Recommendation: No change.

Yeovil Without Parish Council

	Issue/s	South Somerset District Council response
1	Appears that housing numbers have been reduced from 2,500 to 1,565 as southern location is the only option capable of accommodating 2,500 dwellings. Generally accepted that the worst case scenario would be the 'necklace' solution which would result in a large number of dwellings without the necessary suitable and adequate infrastructure. However, necklace situation already exists around the north of Yeovil with the existing key sites. Situation would be exacerbated by the two site urban extension option.	Noted. See answer to point 1 in Tintinhull Parish Council. Recommendation: No change.

Conclusion: Whilst not always resulting in a specific recommended change to the Local Plan many of the issues raised by the Specific Consultation Bodies and Prescribed Bodies are very relevant. It is recognised that there will be a need for additional work and on-going engagement as part of the Local Plan / masterplanning / site allocations processes to ensure that appropriate and adequate landscape, archaeological, flooding and sewage mitigation measures are put in place and that schools and other community infrastructure are provided where required. Additional traffic modelling work at Yeovil has already been completed provides further evidence on this issue.