

Appendix I: Summary of Responses to Consultation

Yeovil Strategic Growth Options SA Report (October 2013)

Rep ID	Doc Ref	Consultee Comment Summary	Response	Changes
M O'Neill (SSDC Comment ID: 1021)				
1.1	Paras 1.2 & 1.3	Despite acknowledging in #1.2 the four major concerns raised by the inspector with regard to the growth options for Yeovil, I cannot agree that they have been fully addressed in the studies as presented. The P.L.S does not relate landscape to underlying geology or soil – quality, neither does it relate to any historical features apart from field patterns.	Noted and disagree. The fresh and independent SA of reasonable options addresses the Inspector's concerns. The Yeovil Peripheral Landscape Study Addendum (Aug 2013) considers sensitive receptors, which includes designated heritage.	None.
1.2	Paras 1.4 & 2.6	In 1.4 Enfusion say that they were commissioned to carry out a 'fresh and independent S.A. Their work was based on a previous S.A and on the P.L.S addendum, which they appeared to accept without any apparent independent study of landscape, and they also refer to using documents previously published by SSDC which have already been criticised as being flawed, as well as updated evidence provided by SSDC – see# 2.6. As a result of the above, I do strongly query how independent their study has been.	Noted and disagree. The method used in the Yeovil Peripheral Landscape Study Addendum was subject to review by an independent Chartered Landscape Architect. The findings and recommendations of the review were taken into account and informed the final Yeovil Peripheral Landscape Study Addendum (Aug 2013). It is appropriate for the SA/SEA to be informed by existing as well as updated/revised evidence produced by SSDC.	None.

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1.3	Para 1.6	<p>In #1.6, 4thpoint, it says – ‘clearly set out the reason for selecting or rejecting options, explain why options were considered to not be reasonable and thus not need a sustainability appraisal’. The sub-text of this to me is that they are indeed justifying decisions already made. This is contrary to the inspector’s statement in his letter to the council of 17.7.2013 that a ‘genuine re-assessment of the situation ... rather than providing a more detailed justification for decisions which have already been taken.</p> <p>As a result of the above, Enfusion has not carried out a S.A on all the areas surrounding Yeovil. Not only has this reinforced a previous decision to site greater number of dwellings to the south, but it has also meant that a true appraisal of potential components of a multi-site option has not occurred.</p>	<p>Noted and disagree. As stated in Para 3.9 of the SA Report, “The EU SEA Directive¹ requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan; and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance² advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan”.</p> <p>Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil. The reasons for why areas were rejected as not being reasonable for consideration through the fresh and independent SA are also provided in these Paras.</p>	None.
1.4	Para 3.22	<p>3.With regard to #3.20 and the consideration that each site should be able to deliver 500 dwellings.</p> <p>This alone has meant that a true multi-site option has not been considered.</p> <p>A mantra has been developed in the council that says</p>	<p>The reasons why a minimum threshold of 500 dwellings was set for strategic options for the direction of growth are provided in Para 3.22 of the Yeovil Strategic Growth Options SA Report (Oct 2013). It states in Para 3.22 that, “This was considered to be the minimum size of development that can</p>	None.

¹ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

² <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

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		<p>that only a large urban extension will deliver infrastructure. There are at least two major infrastructure providers who have cast doubt on this. One is the N.H.S whose representative stated flatly that there is no funding for any new health centre. When questioned about this in a meeting with the parishes on 12 December 2013, Mr T Carroll said that funding must still come from the provider, but the council should make land available, the direct implication of this is that residents in any new development will be using currently existing facilities, so my point is that it would be better to enhance them and spread the load by dispersing housing rather than concentrating it.</p> <p>A similar situation exists with regard to schooling. Highways have also stated that there will be no new roads , so any extra capacity need will have to be accommodated by enhancing the existing network.</p>	<p>deliver the community benefits necessary to promote a more sustainable development. Based on other major developments in South Somerset since 2006, developments of less than 500 dwellings have not been required to make provision for a primary school or on-site formal playing fields and other community facilities".</p>	
1.5	Paras 3.24 & 3.25	<p>4. In#3.2 – Yeovil Marsh – I do not follow the logic in this which seems to say that a sustainable urban extension must also rely on services and infrastructure provided by Yeovil, whereas other areas are supposed to be self-contained with their own infrastructure. Being 'at the bottom of a steep slope with foot/bicycle travel significantly reduced, has not stopped Keyford being proposed despite the fact that overall it is easier to start a journey by going uphill and returning downhill in the opposite of what would apply from Keyford to the town centre.</p> <p>Both in 3.23 and 3.24 there are statements made which are equally applicable to East Coker/Keyford but which have not been. For the above reasons I do not accept</p>	<p>The SA does not state that development in the other areas would be 'self-contained'. There are a number of reasons for why this area was not considered to be a reasonable alternative; these are set out in Paras 3.24 and 3.25 of the SA Report. The Yeovil Periphery Landscape Study Addendum (August 2013) Addendum recommends on Pg. 43 that this area is not considered for urban growth as mitigation would not satisfactorily address the potential landscape and visual effects arising from the introduction of substantive and detached urban form within this distinct rural area.</p>	None.

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		that Enfusion is justified in not doing a complete and truly independent S.A.		
1.6	Agricultural Land	<p>4. Despite the fact that the inspector highlighted agricultural land quality as a factor not being given sufficient weight, there are still references to B.M.V land and amalgamation of grades as if they are the same. I have written and spoken in council meetings to say that Grade 1 land can produce three crops over two years, and depending on the crop, sometimes four. Despite doubt and scorn being expressed, I have since confirmed this with the farmer of the land, Grade 2 land is not able to achieve this level of productivity, so it is misleading to bracket them together.</p> <p>Once again, the true meaning of 'to sustain' has been ignored, nothing is more sustaining than adequate food production. I do not agree that the NPPF has been adhered to in letter or spirit on this matter as there are other reasonable alternatives to building on the Grade 1 land at Keyford.</p>	Noted and disagree. The NPPF defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The evidence ³ shows that each of the reasonable options contains best and most versatile agricultural land. In recognition of the evidence and the Inspector's comments the SA distinguished between the grades and states in Para 3.32 of the SA Report that development within option area B, "would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long-term negative effect on this SA Objective. Compared to the other options, this option has the potential for the greatest loss of the highest grade of agricultural land".	None.
1.7	General	5. Numerous references are made about the need for further project level surveys and assessments. I think more of such work should be done before a final decision is made.	The SA/SEA provides a high level strategic appraisal of reasonable alternatives. It is important that the SA is proportionate to the level of plan-making and decision-making, and that SEA does not duplicate or pre-empt lower level assessment at EIA and the ES that accompanies a project level planning application.	None.

³ South Somerset District Council Local Plan Evidence Base. Core Document 135: Agricultural Land Classification Maps - Yeovil. Available online: <https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/evidence-base/yeovil-specific-documents/>

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1.8	Appendix II, SA Obj 6	<p>6. I would like to make some extra comments about some of the S.A criteria.</p> <p><u>S.A Criteria 6 – reduce crime.</u> There is no indication that in a current rural area crime would actually increase, it is almost axiomatic that there is more potential crime in build-up areas than in open countryside.</p>	<p>The appraisal found that none of the options are likely to have significant effects on crime. Proposed Submission Local Plan (July 2012) Policy EQ2 (General Development) seeks development proposals to create safe environments and address crime prevention and community safety.</p>	None.
1.9	Appendix II, SA Obj 8	<p><u>S.A 8 – Transport.</u> With regard to upper Mudford it says that '.... Ensure the nature and volume of traffic and parked cars generated by the development would not have a detrimental impact on the character and amenity of the local or strategic road network in terms of both volume and type of traffic generated.</p> <p>This statement must also be applied to Keyford, where all traffic would be obliged to access the A37 and most would be using the Quicksilver Mail roundabout unless going south.</p> <p>If there is truly a desire to follow the above then there would definitely be a multi-site option to disperse traffic. I am assuming that all my comments about traffic and highways which I made in the previous consultation are still valid.</p> <p>Enfusion expect sustainable transport measures to be in place and operational with first occupancy. I suggest that this is an aspiration and unlikely to happen.</p> <p>While it has been tacitly admitted that Hendford Hill is a</p>	<p>This paragraph refers to the mitigation provided by Proposed Submission Local Plan (July 2012) Policy TA5 (Transport Impact of New Development). It is referred to against SA Objective 8 within the appraisal for each of the Options in Appendix II. It is therefore not a 'desire' or 'aspiration' of the SA as it is set out in policy within the Local Plan. Any proposed development within the option areas would need to demonstrate that it meets with the requirements of Policy TA5.</p> <p>It is reasonable for the SA to assume that transport measures will be in place with first occupancy as Proposed Submission Local Plan (July 2012) Policy TA1 (Low Carbon Travel) states that all new residential and employment developments in South Somerset should ensure that sustainable transport measures are in place and operational concurrent with first occupancy.</p> <p>The appraisal of Option B against SA</p>	None.

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		deterrent to walking and cycling from Keyford, the tone used about a pedestrian link to Yeovil town centre through the country park suggests that this will somehow be easier. I have not been able to ascertain exactly where such a route would go, however, the fact is that the total height difference between any particular part of Keyford and Yeovil town centre is the same whatever route is taken. Moreover, as I know the area, I can say that the gradients other than Hendford Hill itself are frequently greater. A new path could reduce gradient by zigzagging along the contours but this would increase the distance. Creating a path suitable for disabled users could also prove challenging. Thus, I still consider that walking/cycling from anywhere in Keyford will be only for the fittest and most determined.	Objective 4 states, "There are also opportunities to provide links to the adjacent Yeovil Country Park, which has the potential for a minor long-term positive effect on health. There is the potential for significant long-term positive effects on health for the wider Town if development could also contribute to improvements to pedestrian links (including walking, cycling and disabled access) between the Country Park and Town Centre. Particularly if this is implemented in a way that makes the topography easier to manage for the public to walk and cycle between the Country Park and Town Centre". This was noted within the appraisal but did not significantly affect the significance criteria awarded against SA Objective 4.	
1.10	Appendix II, SA Obj 9	<u>S.A 9 – Protect and enhance landscape</u> Although it is stated that housing numbers are to be valid within the plan period, there are still references to post-plan development. I do not think that the setting of Yeovil itself is sufficiently considered, the natural setting is between two escarpments, in a bowl and natural expansion would be east/west.	The SA was informed by the Peripheral Landscape Study Addendum, which considered the capacity of the option areas to accommodate development during the life of the plan and beyond.	None.
1.11	Appendix II, SA Obj 12	S.A 12 – minimise pollution (air, water, land, light, noise and waste) This item to some extent has been treated as causing a temporary and short term effect caused during	The SA states for each of the Options in Appendix II that, "there is also the potential for all of the options to have negative effects on air, water, land, light and noise pollution in the medium to long-term.	None.

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		<p>construction of any development, whereas I would prefer to concentrate on the permanent, long term effects.</p> <p>Air pollution is likely to increase wherever development is situated, but prevailing wind direction will tend to blow from the south over the residents of Yeovil, whereas it will tend to blow over less densely populated from northern areas.</p> <p>Land pollution is mainly the loss of agricultural land. Keyford is Grade 1, other areas are less productive. Enfusion states quite plainly that there is no mitigation for the loss of Grade 1 land. Please refer to earlier comments. Any development will pollute land from run-off from housing, particulates etc.</p> <p>Noise is also something that goes with residential development and extra traffic.</p> <p>In terms of light pollution, the area to the south of Yeovil, south of the escarpment, is the only one currently free of major light pollution and is a recognised area of intrinsic darkness. Any development here will be seen for miles at night, currently the only lights readily and constantly visible are those of the Red House roundabout and the A37 north from it.</p> <p>By contrast, the lights of Yeovil are crealy visible already from the northern approaches, and although undesirable any extra lighting would be assimilated into that already there. The lights of Ilchester, Yeovilton and the night glow of Bristol are also readily visible.</p>	<p>Mitigation provided by Proposed Submission Local Plan policies EQ2 and EQ7 (Pollution Control) along with mitigation available at the project level should ensure that effects are not significant".</p> <p>Please refer to the response for Rep ID 1.6.</p> <p>Please refer to the para above.</p> <p>The light from existing development to the south of Yeovil, including the rugby club, and the A37 are already visible, which is noted within the Yeovil Peripheral Landscape Study Addendum (August 2013). It is considered unlikely that development would have significant effects. Mitigation measures available at the project level could address any specific issues relating to light pollution once further details of proposed development are known.</p>	

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		It would be nice to be able to believe that developers would install lighting that had no spillage, but that entails extra expense which I have doubts would be forthcoming.		
1.12	Appendix II, SA Obj 13	<p><u>S.A 13 – flooding</u></p> <p>Although the actual site of Keyford may not be subject to flooding, it may none-the-less contribute to extra surface water run-off which could exacerbate the flooding problems on the A37 to the south of the site, and in Barwick Village.</p>	Noted, however the SA identifies potential mitigation through Proposed Submission Local Plan (July 2012) Policy EQ1 (Addressing Climate Change in South Somerset), which supports proposals for new development where it directs development away from medium and high flood risk areas and reduces and manages the impact of flood risk by incorporating Sustainable Drainage Systems, and through appropriate layout, design, and choice of materials.	None.
1.13	Appendix II, SA Obj 14	<p><u>S.A 14 – Biodiversity</u></p> <p>There is no mention of the fact that water-voles and kingfishers inhabit the river to the south of the Keyford site, or the potential for dormice along the land cutting through it. Neither is the sandy-skilt puffball which exists neat the Red House.</p>	Noted, however this does not significantly affect the findings of the appraisal. Any proposal for development would be subject to further more detailed project level surveys and assessments. These would confirm the presence of important species and habitats and set out appropriate mitigation measures to minimise impacts and address significant effects. The SA found concluded that there is unlikely to be significant effects but that there is an element of uncertainty until project level surveys and assessments have been completed.	None.
1.14	Mutli-site option	<u>Comments on a multi-site option</u>	Noted. The evidence and thresholds set for strategic development resulted in the	None.

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		<p>Throughout the document there are references to a multi-site option but with only 3 or 4 sites. My reading of the inspectors preliminary findings indicates that an option with more than four sites could be equally acceptable as that currently proposed.</p> <p>Enfusion has stated the advantages of a multi-site option, but because of the restrictions placed on them by accepting the PLS at face values, they have not fully considered all the sites which could contribute to the total number of houses proposed.</p> <p>I regard the following points as reasons to reconsider a truly multi-site expansion of Yeovil.</p> <ol style="list-style-type: none"> 1. The latest S.H.L.A.A shows a huge area of available, suitable, viable sites. 2. It would require less greenfield land to be developed, and therefore have a less significant impact on the landscape and visual amenities. 3. A larger number of smaller sites would be more easily assimilated – see #33 of the inspector's letter – 'mitigation measures could successfully assimilate development into the setting of the town at a number of locations' 4. There is no reason why G.1 should not still be established. 5. Housing would be more deliverable, with greater choice, and built as necessary. 6. There is no reason why 'eco' standards should not be achieved. 7. Development could be near established employment areas, rather than seeking to create entirely new ones. 8. Existing facilities could be enhanced, with less impact 	<p>identification of 4 areas that could comprise a multi-site option. Please refer to Paras 3.15 to 3.26 of the SA Report, which set out the method for identifying reasonable alternatives for strategic growth in Yeovil.</p>	

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		<p>on a single area, this includes bus services, health and education services as well as recreational facilities. Also a more dispersed pattern of development would impact less on established facilities.</p> <p>9. Yeovil town centre would continue to be the main retail area.</p> <p>10. Finally a quote 'a truly multi-site delivery may improve viability by making better use of existing capacity that could be enhanced through reasonable contributions'.</p>		
John Swain Ltd (B Lock) (SSDC Comment ID: 1030)				
2.1	Appendix II, Area C	The Sustainability Appraisal unfairly scores Area C too negatively on almost every count. This is evidence of deficiency in the Sustainability Appraisal in failing properly to appraise baseline environmental conditions and likely effects of the Plan, in contravention of the Strategic Environmental Assessment Regulations and the National Planning Policy Framework.	Noted and disagree. Please refer to the responses below.	None.
2.2	Appendix II, Area C, SA Obj 1	<p><u>Sustainability Objective 1: Access to Services & Facilities</u></p> <p>Area C should score positively (+)(++?) as the foot and cycle linkages to the town are less challenging than for other areas on the basis of combination of distance and gradient. It is disputed that the river and railway line present insurmountable challenges and the landowner will seek to provide further crossings which would link to north east Yeovil, adding to the simple flat gradient links that already exist to the retail area, golf club, town centre and Pen Mill station, which are the sorts of destination to which distances in other options are judged. It should be noted there is already an underpass under the A30 from the site to the retail area to the south</p>	Noted and disagree. The SA provides a balanced, comparative and proportionate appraisal, which recognises the uncertainties with regard to the delivery of services/facilities and barriers to movement for each option. The SA does not state that the river and railway are 'insurmountable challenges'. The SA states for Option C against SA Objective 1 in Appendix II that, "there is currently only one crossing point into the town across the River Yeo along Sherborne Road (A30). It is possible that providing additional crossing points over the River Yeo and railway may not be	None.

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		of the A30, which would be available to pedestrians and cyclists.	feasible".	
2.3	Appendix II, Area C, SA Obj 2	<u>Sustainability Objective 2: Poverty and social exclusion</u> Area C Middle Yeo would more readily address deprivation in the particularly challenged wards in the East of Yeovil, and regeneration of the struggling Penn Mill industrial estate, to which it is adjacent. This should argue for the scoring to be double positive (++) for Area C.	Noted and disagree. The SA found that all the Options have the potential to have a minor positive effect against this SA Objective. As the development is adjacent rather than within the most deprived wards the effects are likely to be indirect. This along with the barriers to movement resulted in the SA finding that the positive effects are unlikely to be significant.	None.
2.4	Appendix II, Area C, SA Obj 3	<u>Sustainability Objective 3: Housing</u> Area C, including the land held by the landowner making this representation, could deliver up to 2,500 homes, with much more certainty given the known lack of constraints, for example with regard to historic environment. Arguably therefore only this option should score the double positive (++) .	The SA found that Area C has the potential for significant positive effects (++) against SA Objective 3. The available evidence (Yeovil Peripheral Landscape Study Addendum) identified that the site has the potential to accommodate between approximately 1,575 and 2,025 dwellings (based on a density of 35 - 45 dwellings per hectare).	None.
2.5	Appendix II, Area C, SA Obj 4	<u>Sustainability Objective 4: Improve health and well being</u> Area C in fact is much more likely than the other options to deliver modal shift enabling cleaner air to breathe and better exercise for residents, for reasons as in Objective 1 above. It should therefore gain the double positive (++) rating.	Noted and disagree. Please refer to response for Rep ID 2.2.	None.
2.6	Appendix II, Area C, SA Obj 5	<u>Sustainability Objective 5: Education and skills</u> Area C has the highest capacity for housing and therefore education catchment, and is well related to	Noted and disagree. The SA found that there is uncertainty for all of the Options against SA Objective 5, as the precise details of what will be provided in terms of	None.

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		the town centre and in the south eastern part of the town where education and skills are among the poorest, with limited, known environmental constraints. It is therefore more likely to provide a site for primary and secondary education, even before considering the commitment of the landowner, and it can potentially layer onto the existing high quality education infrastructure within reasonable proximity in Dorset. It should therefore score positively for this objective (+).	new education facilities is not known. The available evidence (Yeovil Peripheral Landscape Study Addendum) identified that the site has the potential to accommodate between approximately 1,575 and 2,025 dwellings (based on a density of 35 - 45 dwellings per hectare). Other options were identified in the Yeovil Periphery Landscape Study (August 2013) as potentially having a higher capacity than Option C.	
2.7	Appendix II, Area C, SA Obj 7	<p><u>Sustainability Objective 7: Economy</u></p> <p>Area C should score a double positive (++) because of the additional impact growth in its local area should have on regenerating the Penn Mill trading estate and the eastern end of the Town Centre, as well as linking well to the "Urban Village".</p>	Noted and disagree. The SA found that all the Options have the potential to deliver 5ha of employment and also have good access to existing employment areas.	None.
2.8	Appendix II, Area C, SA Obj 8	<p><u>Sustainability Objective 8: Traffic</u></p> <p>Area C should score positively (+) due to better prospects for modal shift as described above, with less need to use the car relative to other options. Contrary to SSDC's assertions, there is good prospect for more foot and cycle links to the north east of Yeovil, and that could lead to a more positive score still (++).</p>	Noted and disagree. The SA found that there was an element of uncertainty with regard to the potential provision of new pedestrian links as a result of the River Yeo and railway running along the western boundary of the site.	None.
2.9	Appendix II, Area C, SA Obj 9	<p><u>Sustainability Objective 9: Landscape and townscape</u></p> <p>Area C should be scored positively (+) due to the lack of impact on significant landscapes, seclusion within the Yeo valley, lack of impact on villages, and prospect of significant improvement to the aesthetic of the eastern</p>	Noted and disagree. The SA was informed by the Yeovil Peripheral Landscape Study Addendum (Aug 2013), which found that development in this area could have significant landscape and visual effects.	None.

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		entrance to the town of Yeovil. There are no views from the north east into this site impact on which cannot be mitigated or avoided altogether by limiting the northward extent of development, It is self-contained.		
2.10	Appendix II, Area C, SA Obj 10	<p><u>Sustainability Objective 10: Historic environment</u></p> <p>Area C does not contain any historic assets and there would be no impact in this sphere. In the context of protecting the rest of Yeovil's history by directing growth into Area C, and providing a better entrance to the town, this objective should be scored positively for Area C (+).</p>	Noted and disagree. The SA concluded that this option has less potential for negative effects on designated heritage than the other options; however, there is still an element of uncertainty until detailed proposals and project level assessments have been carried out.	None.
2.11	Appendix II, Area C, SA Obj 11	<p><u>Sustainability Objective 11: Climate Change</u></p> <p>For the reasons given in objectives 1, 4 & 8 above, Area C is more likely than other options to deliver modal shift therefore it should be scored more positively (++).</p>	Please refer to responses for Rep IDs 2.2, 2.5 & 2.8.	None.
2.12	Appendix II, Area C, SA Obj 12	<p><u>Sustainability Objective 12: Minimise Pollution</u></p> <p>Of the 5 types of pollution identified, Area C performs well on minimising 3 of them:</p> <ul style="list-style-type: none"> - air pollution is minimised because of good prospect of modal shift and situation to the east of the town so that prevailing south westerly winds do not exacerbate the town's existing Air Quality Management Area; - light pollution is not an issue as the site falls wholly within Yeovil's current urban context from a lighting perspective; - noise pollution is not an issue because of the proximity 	Noted and disagree. Development is considered unlikely to have positive effects on air, light and noise pollution.	None.

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		<p>of the industrial estate and railway line, and traffic would be mainly local</p> <p>Scoring should therefore be positive, save that good quality agricultural land is a consideration. It should be noted that the site has become economically unviable for agriculture in recent years. On balance a single positive is justified (+).</p>		
2.13	Appendix II, Area C, SA Obj 13	<p><u>Sustainability Objective 13: Flooding</u></p> <p>The whole of Area C should not be assumed to be negative since the vast majority of the site is not subject to flooding and flood plains are not proposed for development. Water management is no more difficult than at other sites. Scoring should therefore be the same as for other options.</p>	Noted and disagree. There are some areas of significant flood risk within this option area. The SA recognises in Appendix II that mitigation measures are available at the project level to ensure that there would be no significant effects.	None.
John Davies (SSDC Comment ID: 1044)				
3.1	General	1. Sustainability scores used by SSDC are inaccurate. The data cannot be trusted and is being challenged.	Opinion noted.	None.
Gina Seaton (SSDC Comment: 1051)				
4.1	Reasonable alternatives	I object to the proposed main modifications as the reassessed Sustainability Appraisal still has not given weight to some important and relevant material evidence which needs to be explored and addressed. In particular, the evaluation, ref Item 11 of the PMB of October 25th 2013 only defined assessment of four areas around Yeovil. It did not include other locations to the	Noted. Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil as well as the reasons for why some areas were rejected as not being reasonable.	None.

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		north and west of Yeovil which, as recent SHLAA maps show, could contribute to meeting the local housing need,		
4.2	Housing numbers	2.6. I object. The Sustainability Appraisal Review Addendum does not justify the use of 2500 dwellings as the base level for options assessment, was not justified as already recognised. The present up to date calculation of dwelling numbers required of 1565 in any combination of sites.	Noted and disagree. The SA did not use 2,500 dwellings as the base level for options assessment. Please refer to Para 3.21 of the Yeovil Strategic Growth Options SA Report (Oct 2013).	None.
4.3	Appendix II, Area B, SA Obj 12	<p>This still does not address the Inspector's Conclusion on First Issue. 51. In summary I have four concerns regarding the SA:</p> <p>1. The lack of weight attached to the need to seek to use areas of poorer quality agricultural land in preference to that of higher quality (bearing in mind that once lost such high quality land cannot be retrieved)</p> <p>Section 12- It is noted that in the Inspector's Preliminary Findings Section 12 Minimising pollution (including land) I agree with the Inspector's remarks. In summary</p> <p>40. East Coker should have been given a double negative score against other options because the site of 800 proposed houses are completely on Grade I land. I agree that the Inspector's agricultural land classification has no separate objective, this was removed at the Full Council Meeting of 23 April 2012 in recommendation 12- Section Constraints Mapping Analysis, page 41. Quote "A decision is then considered appropriate not to apply.</p>	The NPPF defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The evidence ⁴ shows that each of the reasonable options contains best and most versatile agricultural land. In recognition of the evidence and the Inspector's comments the SA distinguished between the grades and states in Para 3.32 of the SA Report that development within option area B, "would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long-term negative effect on this SA Objective. Compared to the other options, this option has the potential for the greatest loss of the highest grade of agricultural land". The loss of Grade I agricultural land was one of the reasons that the Council decided to reduce the level of	

⁴ South Somerset District Council Local Plan Evidence Base. Core Document 135: Agricultural Land Classification Maps - Yeovil. Available online: <https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/evidence-base/yeovil-specific-documents/>

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		<p>lower priority constraints. Furthermore these lower priority constraints are land extensive their removal as an inhibition to growth is expected to expose sites.</p> <p>On this basis, stage 3 requires the removal of agricultural land and landscape constraints and 3 general areas with potential for development present themselves, North West, South West and an option to the north of Yeovil.. ... The downgrading of some constraints has produced a third multi-site option.</p> <p>.This will have significant time implications for the Core Strategy. The multi optional constraint like the other two does require compromising land on which landscape and agricultural constraints exist."</p> <p>41. I agree with the Inspector's Agricultural land classification. There is no separate objective seeking to protect higher quality agricultural land and there is no reference in Para 5.2.2 to this national objective. The weight given to this objective by the council appears to be less than other issues that relate to delivery of sustainable development. There is no discussion on the issue under either February or August 2010 SAS although the council has concluded that option 10 should be given another negative (making it a double negative) because it would utilise agricultural land. Site options Sustainability Appraisal Summary Growth Options 2009 Table 12 Item 9 constraints mapping analysis of April2012 required the removal at Stage 3 of the agricultural land and landscape constraints to produce a site to accommodate the housing requirements which continues to be ignored today on the site at East Coker/Keyford. This shows the total lack of importance</p>	<p>development proposed in Area B.</p>	

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		<p>placed by the council throughout the whole process of the local plan.</p> <p>42. Of the Inspector's Preliminary Findings. The NPPF in paragraph 112 states that "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 higher quality.</p> <p>43. The Statement of Common Ground that relates to the proposed SUE states that part of the area, for reasons or droughtiness, may be Grade 2 and it is stated that similar droughtiness issues may apply to other land within this location. The whole of this site is definitely on Grade 1 land and the consideration for alternative locations for an urban extension should be assessed.</p> <p>44. All the options would involve development on agricultural land but it is only option 10 which, according to the MAFF plans, is primarily Grade 1. The advice in the NPPF does not appear to be appropriately reflected in the SA and I am not satisfied that the Council has attached sufficient weight to seeking the use of poorer quality agricultural land. As an aside I note that part of the Council's vision for 2028 is the retention of a viable agricultural base with high quality local food production. The issue of future Food Sustainability and reduction of Food Miles has not been addressed by developing an urban extension of 800 houses on this valuable land of which there is only 5% in the whole of England and Wales.</p> <p>This is a most precious resource (which can never be</p>		

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		<p>replaced) and when there are other-multi-site options that could be accommodated on lesser quality land and which are now known to be available on the peripheral edges of Yeovil as shown on the recent SHLAA Report 2013 (Reports 5.1 & 5.2) and SSDC Maps passed at the SSDC DX Meeting in Yeovil on 5 December 2013 and other documents including the Site Analysis Report (compiled April 2012 – March 2013 but dated 20 November 2013). The assumptions made in Options For Strategic Growth in Yeovil Area B Coker means that only it will only reduce the use of Grade 1 land by 50% which does not achieve the NPPF directive.</p>		
4.4	Local Plan	<p>Policy YV3 - East Coker and North Coker Buffer Zone</p> <p>Grade 1 buffer zone fields are classed as Best and Most Versatile land (previous RSS 2009 description) which would have a potential negative effect should they be developed. I object to the following comment "although the land is not currently used for agriculture and other high quality agricultural land may be excluded from the urban extension inconsequence". This comment, I believe, has arisen from an SSDC area site visit in November 2010 to view a field in East Coker/North Coker/Keyford where the Grade 1 land had been planted with a sustainable mustard seed crop which had been left to rot -looking as though it was currently uncultivated- for the purpose of becoming organic fertilizer which is ploughed back in to the soil to enhance its organic properties to produce two or three crops every year. This organic procedure is not widely known outside the farming community and therefore not understood. This has potentially influenced poor decision making.</p>	Noted. This is a matter for the plan-making process.	None.

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West Dorset District Council/ Weymouth & Portland Borough Council (SSDC Comment ID: 110)				
5.1	Area C	<p>West Dorset District Council would like to respond as follows, though please note that this is an officer response, agreed in discussion with the Leader, which will be considered by the Executive Committee on 14 January. I shall let you know if any changes are made at the meeting. The committee report is also attached.</p> <p>It is noted that the Sustainability Appraisal report refers not only to this council's opposition to the proposal, but also to uncertainty around potential infrastructure provision and planning obligations as a result of the location in another district, as reasons against development of this particular site. While the decision not to progress this site is supported for the reasons given above, it is suggested that care is taken over the weight to be given to these deliverability issues, as matters of infrastructure requirements in particular could be dealt with through cooperation between the two councils.</p>	<p>Noted. The SA has taken a balanced approach to the comparative appraisal of reasonable options. Whilst it is noted within Appendix II that Area C lies within another Local Planning Authority area, so would not be subject to the same planning policies and contributions as Options B and D, it has not significantly affected the findings of the appraisal.</p>	None.
L Luscombe (SSDC Comment ID: 241)				
6.1	General	<p>I wish to object to the Proposed Main Modifications to the Proposed Submission South Somerset Local Plan 2006 - 2028.</p> <p>The modification which I object to is the change from a Single Sustainable Urban Extension Site to the South of Yeovil, to two smaller sites, one to the North and the other to the South of Yeovil.</p> <p>The Planning Inspector had four areas of concern which</p>	<p>Opinion noted. The Yeovil Strategic Growth Options SA Report (Oct 2013) addresses the Inspector's concerns and provides a fresh and independent appraisal of reasonable options.</p>	Noted.

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		correctly needed to be revisited. The reappraisal of the evidence by Effusion highlighted the fact that there is no position around Yeovil which would be simple and non controversial site for the extension (this was already obvious to all who had put any thought to the matter) However Effusion did not bring any new facts to be considered, so I find it incomprehensible that the Planning Department then suddenly switched its proposal from the Single Southern site to a split North & South Site.		
S Lewis-Cowlin (SSDC Comment ID: 336)				
7.1	Para 3.32, Agricultural Land	<p>I object to the modified plan for the Yeovil Urban extension in East Coker the report states 3.32 This option predominantly contains Grade 1 agricultural land¹¹, which is identified as „excellent? in the Agricultural Land Classification of England and Wales¹². Development within this option area would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long-term negative effect on this SA Objective. Compared to the other options, this option has the potential for the greatest loss of the highest grade of agricultural land.</p> <p>LOOK, READ and LISTEN to the objections</p> <p>No local plan should include the need to build on this level of agricultural land.</p>	<p>The NPPF defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The evidence⁵ shows that each of the reasonable options contains best and most versatile agricultural land. In recognition of the evidence and the Inspector's comments the SA distinguished between the grades and states in Para 3.32 of the SA Report that development within option area B, "would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long-term negative effect on this SA Objective. Compared to the other options, this option has the potential for the greatest loss of the highest grade of agricultural</p>	None.

⁵ South Somerset District Council Local Plan Evidence Base. Core Document 135: Agricultural Land Classification Maps - Yeovil. Available online: <https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/evidence-base/yeovil-specific-documents/>

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			land". The loss of Grade I agricultural land was one of the reasons that the Council decided to reduce the level of development proposed in Area B.	
N Gage (SSDC Comment ID: 348)				
8.1	Appendix II, Area B, SA Obj 10	The Sustainability Appraisal (SA) still gives insufficient weight to protecting the historic environment in the Coker area of growth.	Noted and disagree. The SA was informed by the Historic Environment Assessment of Yeovil Periphery (July 2010) as well as the Yeovil Peripheral Landscape Study Addendum (Aug 2013), the latter of which considers designated heritage. The appraisal of Option B also took into account previous responses from English Heritage related to proposed development at Area B. The SA found that development at Area B has the potential for a significant medium to long-term negative effect on SA Objective 10 (historic environment). It concludes that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects.	None.
J K Snelling (SSDC Comment ID: 467)				
9.1	Section 3, Reasonable Alternatives	In response to the Planning Inspector's letter which reveal the unsoundness of the SSDC's Local Plan the Council wrote back and gave him an under taking that they would carry out an 'Independent' review of the Local Plan and that review would be carried out by	Noted and disagree. Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil as well as the reasons for why certain areas were	None.

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		<p>Independent Consultants.</p> <p>Enfusion were engaged and then briefed by the Council however in briefing Enfusion the SSDC told these Consultants not to look at at over 50% of possible areas of potential development around Yeovil. Many of the areas that could be used for development have been ignored many of these areas appear in the Council's very own SHLAA document.</p> <p>Whilst ignoring very suitable areas for development, the SSDC identified one area to Enfusion to review, which is best described as a complete 'Aunt Sally' the area identified as 'C Dorset/Middle Yeovil' the world and his wife knows that this is unsuitable with flooding and bordering Dorset it was never a contender.</p>	<p>rejected as not being reasonable.</p>	
9.2	Section 3, Reasonable Alternatives	<p>One reason given for not including certain areas is that they are not large enough to accommodate 500 or more houses which would then be supported by such facilities as health centres. Were council members not present at the hearing where a representative from the local Health Trust said they had no money to build even one new Health Centre.</p> <p>No doubt the SSDC will say that they will raise the money for such facilities through a section 106 but as has been demonstrated recently in the SSDC area a section 106 is not worth the paper it is printed on when thirteen million pounds is handed back to developers under a cloak or secrecy between the SSDC Council, Councillors, and Developers.</p> <p>A far more deliverable option is a multi option approach</p>	<p>The Yeovil Strategic Growth Options SA Report (Oct 2013) states in Para 3.22 that each area should be able to deliver 500 dwellings as this was considered to be the minimum size of development that can deliver the community benefits necessary to promote a more sustainable development. Based on other major developments in South Somerset since 2006, developments of less than 500 dwellings have not been required to make provision for a primary school or on-site formal playing fields and other community facilities.</p>	None.

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		<p>were existing facilities can be expanded to meet demand rather than large sites that require high levels of investment, investment money that is not there and is never likely to be there.</p> <p>Yet the SSDC precluded Areas 'A' 'E' and 'F' plus the area around Stone Lane all of which appear in the SHLAA for example areas S/YEWI/0008, S/YEWI/0004, S/YEWI/0500, S/YEWI/0900 these are all areas considered suitable for development yet were not considered in this 'independent' report.</p> <p>On the face of it this is the sort of independence that one might expect from a Banana Republic and if I were the Planning Inspector I would be asking if the SSDC had short changed me on their undertaking for an independent review.</p>		
J Clough (SSDC Comment ID: 558)				
10.1	Appendix II, Area D	<p>Having read much of the Consideration of Alternatives for the Local Plan for Strategic Growth of Yeovil & the Sustainability Appraisal Report I can see that there is no obvious solution but there also appears to be some manipulation / alteration and disregard for facts which originally made Option 7 (Up Mudford) the less regarded option in the SA Report namely:</p> <p>* Furthest from existing facilities in town centre, employment, & education.etc.</p> <p>* Geographically unsuitable for pedestrian access, therefore considerable increase in traffic would cause</p>	<p>Noted. The SA sought to address the Inspector's concerns and provide a balanced, comparative and proportionate appraisal, which recognises the uncertainties with regard to the delivery of services/facilities and barriers to movement for each option. The SA has also been informed by updated evidence, which includes the Yeovil Peripheral Landscape Study Addendum (August 2013).</p>	None.

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		<p>congestion on roads already suffering, particularly at the junctions of Lyde Road & Coombe Street Lane with A359, & section of A359 towards Mudford is particularly narrow & dangerous.</p> <p>* There are limited opportunities to avoid sensitive elements in the landscape. many historic settlements have yet to be studied, & the area around Mudford affords beautiful views of Cadbury Castle.</p>		
Iris Coton (SSDC Comment ID: 610)				
11.1	General	<p>This current proposal is an entirely new plan. When SSDC instructed Enfusion to prepare a report, they tried so hard to be seen to be fair, that they gave Enfusion too wide a brief and this resulted in a completely new proposal instead of finding the evidence to support the original submission which was what the inspector had asked them to do. Indeed, the inspector agrees with me because in clause 67 of his Preliminary Report, the Planning Inspector implied that a change to a multi-site approach" equated to " an entirely different strategy". The planning inspector acted like a teacher telling a pupil that they needed to improve an essay in order to pass. What has happened is an entirely different essay and it is worse than the first one. The Planning Department had worked for a long time preparing a plan. The Enfusion report was produced in a very short period of time. Are they really cleverer than anyone else? I read the report and found it a massive fence sit.</p>	<p>Opinion noted. This is primarily a matter for the plan-making process. The SA sought to address the Inspector's concerns and provide a balanced, comparative and proportionate evidence based appraisal.</p>	None.
11.2	Section 3, Housing Numbers	<p>NUMBERS OF HOUSES REQUIRED.</p> <p>ENFUSION concluded that the numbers could be</p>	<p>The number of houses required during the plan period is a matter for the plan-making process. South Somerset District Council</p>	None.

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		<p>reduced from 2500 to 1565 for the period to 2028. I do not see any evidence that their figure is more accurate than the original figure of SSDC. In addition, everyone knows that there will be another local plan beyond 2028 and that house building in the area will not stop in 2028. I would refer you to comments made by the Planning minister, Nick Boles, MP in November when he referred to the chronic and severe shortage of affordable housing. I see no evidence that the Planning Inspector was requesting a reduction in the number of homes proposed. I suspect that, if anything, he will be expecting more. The justification given by SSDC suggests that the reduction in numbers was to allow other sites to be included, in particular Primrose Hill.</p>	<p>Proposed Submission Local Plan (June 2012) Policies SS5 and YV1 identify that the objectively assessed need for housing and associated infrastructure in a Yeovil sustainable urban extension is for an additional 1,565 dwellings over the lifetime of the Plan up to 2028.</p>	
11.3	General	<p>SUSTAINABILITY.</p> <p>The Oxford English Dictionary definition of "sustain" states "to hold up, carry weight for a prolonged period". In my view, a Sustainability Appraisal Assessment requires that the future of the area and its needs should be assessed to 2028 and BEYOND (fifteen years is not a prolonged period in the life of a community). Failure to do this is symptomatic of the "short term" malaise that has caused so many problems in so many areas of public life and services.</p> <p>If the future of the area is to be adequately catered for, then the SSDC and the Planning Inspector should be looking to the long term. If this is done, it is obvious that houses will be needed beyond 2028. Where will those houses be built? I submit that if 800 houses are built in the Southern extension to 2028, that an extension of this site will have to be considered in the next plan. If that is so,</p>	<p>Noted. The number of houses required during the plan period and beyond is a matter for the plan-making process.</p>	None.

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		surely it would be much better to build a proper Urban Extension with this plan now. This would contain substantial benefits for the community. As described, there could be provision for an additional secondary school. Everyone who has had children educated in the current state secondary schools (where most of our children attend) are well aware of the limitations of all three school sites. To extend classroom provision would inevitably mean loss of sports fields. To consider this acceptable would be a betrayal of the Olympic Legacy that everyone seemed to want to develop a year ago.		
11.4	Appendix II, Areas B & D, SA Obj 5	<p>The secondary schools in Yeovil are all in the north of the town. Children have to travel in to Yeovil from East Coker and its environs. A new school in that area would be very desirable and sustainable. There are many other advantages as have been set out in the original plan.</p> <p>If the southern extension was adopted, then the schools at East Coker and Barwick could be developed. Quite a few Yeovil children attend East Coker school because, partly, to the number of school places in Yeovil town. These schools would be sustainable. The children in Wyndham Park have a considerable distance to travel to school. The same would apply to a new development. On a map, it looks as if the children from both sites could be educated together. The logistical reality is somewhat different.</p>	The evidence indicates that the scale of proposed development is unlikely to result in the provision of any significant new education facilities, such as a secondary school; however, there is the potential for all the options to provide a new primary school and extend/ upgrade existing facilities ⁶ . The distance of the options from secondary schools was considered; however, the SA concluded that there is uncertainty as the scale and scope of education facilities to be provided as part of development are not known.	None.
11.5	General	The Enfusion Report looked at the various sites for homes around Yeovil. Having done this, they confirmed the	Opinion noted. The potential capacity of sites referred to in the SA Report was	None.

⁶ Para 2.13 of the Proposed Main Modifications Consultation Document (November 2013) and Somerset County Council PMM Representation (Comment ID 555).

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		<p>original conclusion of the SSDC Planning Department that there was only one site large enough for a single Urban Extension and that was the site to the south of the town. Even if the new figure of 1565 is accepted, they confirmed that there is still only one site capable of accommodating all of those homes and that is the southern extension. It has the further advantage that it could be extended after 2028. There are no other sites that can do this.</p> <p>ENFUSION have suggested that a two site option should replace the original proposal. There is still a very good strong case to be made for the original strategy. I believe that when Enfusion was instructed by SSDC that the latter bent over so much to be seen to be fair that they lost an opportunity to provide the evidence for the original proposal that could have been found.</p>	<p>informed by the Yeovil Peripheral Landscape Study Addendum (August 2013). It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision. The fresh comparative SA of strategic growth options for Yeovil did not identify a clear preferred option. The Council requested that Enfusion assist to develop further plan-making criteria to help differentiate between the options and inform the decision-making process. See Para 4.1 of the Yeovil Strategic Growth Options SA Report (Oct 2013).</p>	
Brympton Parish Council (SSDC Comment ID: 627)				
12.1	General	<p><u>INSPECTOR'S PRELIMINARY FINDINGS AND PROPOSED MAIN MODIFICATIONS AS PUBLISHED BY SOUTH SOMERSET DISTRICT COUNCIL (SSDC).</u></p> <p>Under the South Somerset Local Plan 2006 – 2028, it was originally envisaged that 2500 houses would be built over the next 15 years at Keyford and Coker to the south of Yeovil, as part of the Yeovil Urban Extension (YUE).</p> <p>The Planning Inspector appointed by the Government to review the Local Plan issued his Preliminary Findings in July 2013, following Hearings in May and June 2013. He indicated that more detailed work was needed on all of</p>	<p>Noted. These points are primarily matters for the plan-making process.</p>	<p>None.</p>

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		<p>the alternative locations for the YUE before a definitive decision in favour of the southern option could properly be considered to be sound.</p> <p>The Planning Inspector's conclusions on the Sustainability Appraisal Assessment (which formed part of the substantiation of the Local Plan) with regard to the location of the YUE, were as follows:-</p> <p>51. <i>"In summary I have four concerns regarding the SA:</i></p> <ul style="list-style-type: none"> - <i>The lack of weight attached to the need to seek to use areas of poorer quality agricultural land in preference to that of higher quality (bearing in mind that once lost such high quality land cannot be retrieved);</i> - <i>The lack of substantive evidence to demonstrate that there are significant differences in terms of landscape impact between several of the options that have been considered. Opportunities for mitigation, primarily through layout and design do not appear to have been sufficiently addressed;</i> - <i>Lack of consistency regarding the consideration of protecting and enhancing the historic environment; and</i> - <i>Lack of clarity regarding the scoring for objective 14 – conserving and enhancing biodiversity and geodiversity."</i> <p>52. <i>"I am not saying that had these four concerns been adequately addressed, then the Council would not have identified land to the south of the town for a sustainable urban extension – it may well still have</i></p>		

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		<p>scored best. However, on the evidence submitted I cannot be sufficiently certain that the most appropriate location for a sustainable development of about 2500 dwellings has been selected."</p> <p>53. "In this respect, therefore, I am currently unable to conclude that the local plan is justified (i.e. the most appropriate strategy when considered against the reasonable alternatives)."</p> <p>It is important to note that the Planning Inspector did not state that the YUE should not be built to the south of Yeovil. Nor did he disagree with the proposal to site the YUE at one location. Likewise he has not made any suggestion that the number of dwellings to be built (2500) was incorrect or that the YUE must be split between two locations. Clause 69 of the Inspector's Preliminary Findings is partially relevant.</p> <p>The Parish Council Brief issued by SSDC in August 2013 stated:-</p> <p>"With regard to an urban extension for Yeovil, the Inspector gave a very detailed analysis of the elements of the Sustainability Appraisal where he found that the Council's existing submission was not sufficiently robust to enable it to be determined as sound. It is important to note that, unlike Ilminster's direction of growth, the southern option for an urban extension in Yeovil has not, at this stage, been found unsound. However, the Inspector did consider that more detailed work was needed on all the alternative locations for an Urban Extension before a definitive decision on the southern option could be properly considered for soundness."</p>		

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12.2	Section 3, Housing Numbers	<p><u>HOUSING NUMBERS, DISTRIBUTION AND QUALITY</u></p> <p><i>“Justification for Change;</i></p> <p><i>Over the course of the preparation of the plan, the scale of development proposed for the greenfield sites in Yeovil (within the plan period) has progressively decreased in scale from 5,000 dwellings, the minimum size generally considered viable for an ‘Eco Town’ to 3,500 dwellings, to 2,500 dwellings to 1,565 dwellings. The Sustainability Appraisal Review Addendum, conducted by independent consultants, derived reasonable alternatives for growth using previous landscape assessments constraints analyses, further desk and site based work, and an updated Landscape Addendum. It was concluded that assessment of reasonable alternatives using 2,500 dwellings as the base level for options assessment, which exceeded the housing need in the plan period, was not justified in that it would mean that there was only one area (the southern, Coker area) with the capacity to accommodate this scale of growth, and would therefore pre-determine the outcome of the process.”</i></p> <p>It would appear from this statement that one of the reasons why the required number of dwellings has been reduced from 2,500 to 1,565 was not because 2,500 dwellings were no longer actually required, but because the southern location was the only option which could accommodate 2,500 dwellings. Normally one would expect that a local plan would initially identify the number of dwellings required before deciding where that number of dwellings could or could not be built.</p>	<p>South Somerset District Council Proposed Submission Local Plan (June 2012) Policies SS5 and YV1 identify that the objectively assessed need for housing and associated infrastructure in a Yeovil sustainable urban extension is for an additional 1,565 dwellings over the lifetime of the Plan up to 2028. The 2,500 dwellings was an aspirational level of growth set by the Council. It was considered appropriate to use the objectively assessed need of 1,565 dwellings as the base level for the identification of reasonable options as this was the identified need during the life of the Plan.</p>	None.

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		<p>It is generally accepted that the worst scenario for the Local Plan would be the construction of a series of smaller developments (each up to 500 houses) around the outskirts of Yeovil. Such a 'necklace' solution would result in a large number of houses being constructed, but without the necessary adequate and suitable infrastructure, community facilities and services which such a large number of houses would normally require.</p> <p>The Northern Parishes would however submit that a 'necklace' situation already exists around the north side of Yeovil. That situation is being aggravated by the construction of the three Key Sites at Lyde Road, Brimsmore and Lufton, and will be further exacerbated if the YUE is allowed to be split into two separate locations at Keyford/Coker and at Primrose Lane, Mudford.</p>		
Chilthorne Domer Parish Council (SSDC Comment ID: 628)				
13	General	Identical representation to Rep ID 12.1 & 12.2	Please see response to Rep ID 12.	None.
Mudford Parish Council (SSDC Comment ID: 629)				
14	General	Identical representation to Rep ID 12.1 & 12.2	Please see response to Rep ID 12.	None.
Tintinhull Parish Council (SSDC Comment ID: 630)				
15	General	Identical representation to Rep ID 12.1 & 12.2	Please see response to Rep ID 12.	None.

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Yeovil Without Parish Council (SSDC Comment ID: 631)				
16	General	Identical representation to Rep ID 12.1 & 12.2	Please see response to Rep ID 12.	None.
F AJoneleit (SSDC Comment ID: 649)				
17.1	Appendix II, Area D, SA Obj 9	<p>The report by the independent consultants Enfusion states that the impairment to inward view towards Primrose Lane / Up Mudford is moderate to high, particularly when viewed from the village of Trent / Dorset hills / Cadbury Castle (Camelot) area. This is the only direction analysed by Enfusion, they should have looked at public visual amenity from the following view points:</p> <p>The outward view from / over the elevated part of the site would be lost for ever for any future generation, if the land was used for housing in the foreground.</p> <p>Views from Primrose Lane itself, towards the before mentioned areas is superb and much enjoyed by the public, winter or summer. Superb views to the Somerset Levels, Glastonbury Tor on to the Mendips and on to the Wilshire Downs.</p>	The SA was informed by the Yeovil Peripheral Landscape Study Addendum (August 2013).	None.
East Coker Preservation Trust (SSDC Comment ID:654)				
18.1	Housing Numbers	<p>The East Coker Preservation Trust</p> <p>Remains of the view that the demographic projections for household growth in the Yeovil area do not justify the</p>	Noted, this is a matter for the plan-making process.	None.

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		need for Urban Extensions at all (for the reasons previously advanced).		
18.2	Appendix II, Area B & SA Obj 10	Also remains of the view that, because the impact of building on Grade 1 land cannot be mitigated (and this was confirmed by Enfusion in the SEA, and verbally by their consultant at the District Executive meeting on 7th November 2013) and because the impact on historic assets in the East Coker area will be severe (and has still not been properly assessed), the only complete solution is zero development in the vicinity of East Coker. These factors have still not been taken fully into account/given sufficient weight (despite being raised by the Inspector).	Noted and disagree. The NPPF defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The evidence ⁷ shows that each of the reasonable options contains best and most versatile agricultural land. In recognition of the evidence and the Inspector's comments the SA distinguished between the grades and states in Para 3.32 of the SA Report that development within option area B, "would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long-term negative effect on this SA Objective. Compared to the other options, this option has the potential for the greatest loss of the highest grade of agricultural land". The loss of Grade I agricultural land was one of the reasons that the Council decided to reduce the level of development proposed in Area B.	None.
18.3	Section 3, Reasonable Alternatives	ECPT is further concerned that, while it welcomes the recognition that the original SEA was not robust and the recognition that a North-eastern Urban Extension has limited impact it maintains the view that all northern	The SA was informed by the Historic Environment Assessment of Yeovil Periphery (July 2010) as well as the Yeovil Peripheral Landscape Study Addendum (Aug 2013),	None.

⁷ South Somerset District Council Local Plan Evidence Base. Core Document 135: Agricultural Land Classification Maps - Yeovil. Available online: <https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/evidence-base/yeovil-specific-documents/>

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	Appendix II, Area B & SA Obj 10	<p>options have not been fully and objectively reassessed. Furthermore despite the further work done the effect of the development options assessed on Heritage Assets has not been assessed fairly and consistently e.g. the impact on Heritage Assets outside but adjacent to the assessed areas to the south of Yeovil has not been taken into consideration while the impact on those to the north has been.</p> <p>ECPT is therefore of the view that all northern options have not been fully and objectively appraised. Some indeed appear to have been rejected out of hand on the basis of a blanket 'effect on visual amenity' impact statement (which does not appear to have been properly evidenced) and which does not appear to have been balanced against other factors in the decision making process.</p>	<p>the latter of which considers designated heritage. The appraisal of Option B also took into account previous responses from English Heritage related to proposed development at Area B. The SA found that development at Area B has the potential for a significant medium to long-term negative effect on SA Objective 10 (historic environment). It concludes that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects. The SA considers and identifies designated heritage outside the boundary of the option area on Pgs. 11 and 12 of Appendix II.</p> <p>Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil as well as the reasons for why some areas were rejected as not being reasonable.</p>	
P Woodford (SSDC Comment ID: 714)				
19.1	Section 3, Reasonable Alternatives	The Sustainability Appraisal Review Addendum, conducted by the contracted consultants considered alternatives for growth using the previous information with an updated Landscape Study Addendum. This study excluded viable alternative areas and along	Noted and disagree. As stated in Para 3.9 of the SA Report, "The EU SEA Directive ⁸ requires assessment of the likely significant effects of implementing the plan and "reasonable alternatives" taking into	None.

⁸ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

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		<p>with the use of previous information cannot be considered as truly independent and satisfying the Inspectors request for <u>“a genuine reassessment of the situation will need to be undertaken, rather than providing a more detailed justification for the decision already taken.”</u></p>	<p>account “<i>the objectives and geographical scope</i>” of the plan; and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “<i>reasonable alternative</i>”; however, UK SA/SEA guidance⁹ advises that it should be taken to mean “<i>realistic and relevant</i>” i.e. deliverable and within the timescale of the plan”. Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil as well as the reasons for why certain areas were rejected as not being reasonable.</p>	
19.2	Appendix II, Area B, SA Obj 10	<p><u>Paragraph 66 of the Inspectors Preliminary Findings asked for “Substantial further work is required particularly to demonstrate that the plan is justified as it relates to Yeovil for example with regard to agricultural land value, landscape setting, conserving the historic environment and biodiversity”</u></p> <p>I do not believe that these issues have been fully considered in respect to the Keyford/East Coker proposal. There is no quality assessment of the historic environment and heritage settings. English Heritage has already objected to the impact of development in this area to the historic assets and their settings, especially the Scheduled Ancient Monument Roman Site at</p>	<p>The SA was informed by the Historic Environment Assessment of Yeovil Periphery (July 2010) as well as the Yeovil Peripheral Landscape Study Addendum (Aug 2013), the latter of which considers designated heritage. The appraisal of Option B also took into account previous responses from English Heritage related to proposed development at Area B. The SA found that development at Area B has the potential for a significant medium to long-term negative effect on SA Objective 10 (historic environment). It concludes that suitable mitigation is available through the Local</p>	None.

⁹ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

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		Dunnock's Lane. No weight has been given to this in the revised Sustainability Appraisal.	Plan and at the project level to address the potential significant negative effects, with minor residual negative effects. In line with English Heritage comments the SA also recommends that any proposal for development in this area should seek opportunities to enhance the setting of the Roman Villa (Dunnock's Lane) and achieve gains through placing interpretation and encouraging community involvement in the management of the Scheduled Monument.	
G L Woodford (SSDC Comment ID: 716)				
20.1	Appendix II, Area B, SA Obj 12	<p>I object to the proposal to site “approximately 800 dwellings and approximately 2.5 hectares of 'B' use class employment land” in the area to the south and west of Yeovil for the following reasons</p> <p>The proposal to develop land in the Keyford/East Coker area will cause the permanent loss of Grade 1 agricultural land. There are areas of suitable land in other locations especially Yeovil that have lower classifications and for the future security of our food supply, should be considered first.</p> <p>This land can never be recovered and the most effective mitigation against loss of Grade 1 land is to not build on it.</p>	Noted. The NPPF defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The evidence ¹⁰ shows that each of the reasonable options contains best and most versatile agricultural land. In recognition of the evidence and the Inspector's comments the SA distinguished between the grades and states in Para 3.32 of the SA Report that development within option area B, “would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long-term negative effect on this SA Objective. Compared to the other	None.

¹⁰ South Somerset District Council Local Plan Evidence Base. Core Document 135: Agricultural Land Classification Maps - Yeovil. Available online: <https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/evidence-base/yeovil-specific-documents/>

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			<p>options, this option has the potential for the greatest loss of the highest grade of agricultural land". The loss of Grade I agricultural land was one of the reasons that the Council decided to reduce the level of development proposed in Area B.</p>	
20.2	Appendix II, Area B, SA Obj 10	<p>English Heritage objected previously to the impact of development in this area to the historic assets and their settings, especially the Scheduled Ancient Monument Roman Site at Dunnock's Lane. Insufficient weight has been given to this in the revised Sustainability Appraisal.</p>	<p>Noted and disagree. The SA was informed by the Historic Environment Assessment of Yeovil Periphery (July 2010) as well as the Yeovil Peripheral Landscape Study Addendum (Aug 2013), the latter of which considers designated heritage. The appraisal of Option B also took into account previous responses from English Heritage related to proposed development at Area B. The SA found that development at Area B has the potential for a significant medium to long-term negative effect on SA Objective 10 (historic environment). It concludes that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects. In line with English Heritage comments the SA also recommends that any proposal for development in this area should seek opportunities to enhance the setting of the Roman Villa (Dunnock's Lane) and achieve gains through placing interpretation and encouraging community involvement in the management of the Scheduled Monument.</p>	None.

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20.3	Multi-site Option	A multi site option with more than 2 sites should be strongly considered. This approach would be easier to deliver reducing the impact on landscape, heritage assets, traffic etc for every area.	Noted. The reasons for the selection/ rejection of options in plan-making are presented in Table 4.1 in the Yeovil Strategic Growth Options SA Report (Oct 2013).	None.
20.4	Appendix II, Area B, SA Objs 4 and 8	The effect of traffic and potential for walking and cycling from East Coker and Hendford Hill have not been examined objectively and the proposal to site 800 houses and industrial buildings in Keyford flies in the face of common sense with respect to this.	Noted and disagree. The SA provides a balanced, comparative and proportionate appraisal, which recognises uncertainties as well as barriers to movement for each option.	None.
20.5	Appendix II, Area B, SA Obj 12	There has been no consideration of "Dark Skies" to the south of Yeovil.	The light from existing development to the south of Yeovil, including the rugby club, and the A37 are already visible, which is noted within the Yeovil Peripheral Landscape Study Addendum (August 2013). It is considered unlikely that development would have significant effects. Mitigation measures available at the project level could address any specific issues relating to light pollution once further details of proposed development are known.	None.
20.6	Appendix II, Area B, Buffer Zone	There is no mention of extending the initially proposed Green Buffer Zone to the boundary of the proposed development. This is inconsistent with minimising environmental impact and preserving the rural landscape	The buffer zone was originally included within the Local Plan as a higher number of dwellings were being proposed. Its purpose was to prevent coalescence with the settlements of East Coker and North Coker and minimise impacts on the historic environment. A development of 1,565 homes would not extend to the settlements of East Coker and North Coker. The boundary of the current proposed site as	None.

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			set out within the Proposed Main Modifications Consultation Document is over 700m away from North Coker and over 1km away from East Coker.	
Wessex Farms Trust (SSDC Comment ID: 723)				
21.1	General, Area B	<p>These representations are submitted on behalf of the Wessex Farms Trust (WFT) which is an owner of part of the land at Keyford allocated for new development in the Local Plan. WFT has taken a strong and central interest in forward town planning at Yeovil for over ten years and was present at the local plan examination in May last year. It has a number of comments on the proposed main modifications and these are summarised in this note which starts with a short review of the current position before assessing its performance and what needs to be done from this point forward.</p> <p>The Council has clearly wrestled with these dilemmas. It has appointed consultants to deal with the Inspector's main concerns about the SA and has reconsidered a large number of growth options around the town. In this respect a concerted attempt has been made to make the plan better (in the Council's opinion at least).</p>	Noted.	None.
21.2	Section 3, Housing Numbers	<p>Our view is that this attempt:</p> <p>a) Is not rightly founded. The Inspector did not ask the Council to find a solution for 1565 dwellings but for the 2500 homes the Council had included in its plan.</p>	South Somerset District Council Proposed Submission Local Plan (June 2012) Policies SS5 and YV1 identify that the objectively assessed need for housing and associated infrastructure in a Yeovil sustainable urban extension is for an additional 1,565 dwellings over the lifetime of the Plan up to	None.

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			2028. It was considered appropriate to use the objectively assessed need of 1,565 dwellings as the base level for the identification of reasonable options as this was the identified need during the life of the Plan.	
21.3	General	b) Remains poorly articulated in some important places. Despite the concerns from the Inspector and the advice from its consultants (Enfusion) about clarity and consistency, the Council's key messages and conclusions are sometimes difficult to follow. This is especially the case in its Proposed Main Modifications document which will be core to any re-opened examination. The SA itself appears to be broadly compliant (but see below).	Noted. This is primarily a matter for the plan-making process.	None.
21.4	General, Area B	c) Can, however, identify a clear favourite for growth in any event and whatever the scale (unless that requirement is tiny which it clearly is not). This decision can be based on truly independent analysis and substantial data. The location is Keyford which performs well against the initial SA criteria if that assessment is properly carried out and reflects the conclusions of the previous local plan inspector which have been very well rehearsed and have not been challenged.	Noted. The fresh comparative SA of strategic growth options for Yeovil did not identify a clear preferred option. The Council requested that Enfusion assist to develop further plan-making criteria to help differentiate between the options and inform the decision-making process. See Para 4.1 of the Yeovil Strategic Growth Options SA Report (Oct 2013). The additional criteria form part of the Council's decision-making process for the Local Plan and are not part of the SA process. Para 4.1 within the SA Report alludes to this but it should be made clearer within the SA and the Proposed Modifications.	A final SA Addendum Report will be prepared and will include a clearer explanation of how the additional decision-making criteria relate to the SA and plan-making processes.
21.5	General, Area B	d) That performance can only improve with the addition of the extra criteria on delivery, longer term scope and	Noted. This is a matter for the plan-making process.	None.

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		mitigation potential. Keyford is in the hands of a very small number of owners who are all completely aligned in direction and proposal. They have carried out substantial analysis of the site and of the high quality mixed use scheme that can be delivered there. It will be a development that the Council and the town can shape and be proud of rather than just accept.		
21.6	General, Housing Numbers	<p>5.0 Conclusions and Recommendations</p> <p>5.1 The need to start delivering is important and is a key responsibility for the plan and the Council. Three other (connected) points are equally clear:</p> <p>a) The first is that the plan must make the right quantitative provision for greenfield development at Yeovil. Whilst it is tempting for the Council to conclude that its proposals have the support of the Inspector, this is not clear, especially as the Inspector asks the Council to continue to plan for sustainable urban extensions of 2,500. The Inspector has not yet explained his reasons for this but it could well indicate that a higher overall figure for Yeovil is needed. This is hinted at by the Council stating that its provision for Yeovil is an at least figure, but is not followed through in the plan's allocations.</p>	Noted. This is a matter for the plan-making process.	None.
21.7	General	<p>b) The second is that the conclusions of it and its SA about option performance can and should be more clearly stated - either because the growth requirement increases (as set out above) or because there is an obvious frontrunner for growth of any scale of (approximately) 800, 1500 or 2500. This is the Keyford area which - especially at the lower end - has been independently assessed in detail and franked for</p>	The findings of the fresh and independent SA are clearly set out in the Yeovil Strategic Growth Options SA Report (Oct 2013). Please see response to Rep ID 21.4.	None.

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		substantial mixed use and housing led development.		
21.8	Local Plan Policy	c) That policy needs to be devised and introduced now to allow the plan to proceed to adoption. Because the plan can rely on Keyford, this site must be prioritised for release, however that policy is set and whatever the scale of the development the edges of the town are asked to accommodate.	Noted. This is a matter for the plan-making process.	None.
East Coker Society (S Owen) (SSDC Comment ID: 746)				
22.1	Appendix II, Area B, SA Obj 10	<p>Soundness Issue 1: Policies YV1, YV2 Urban Framework and Greenfield Housing Requirement for Yeovil and Yeovil Sustainable Urban Extension</p> <p>We OBJECT to the inadequate weighting given to the exceptionally rich historic environment in East Coker and the disregard for Section 12 of the NPPF "Conserving and Enhancing the Historic Environment". The proposed direction of growth is in the immediate locality of the Roman Villa at Dunnock's Lane, registered by English Heritage as an important Scheduled Monument with potential for further archaeological discoveries. Furthermore, two Conservation areas and over 80 listed buildings in East Coker should make this a major rather than a minor negative in the Sustainability Appraisal (Ref: SSDC Local Plan: Strategic Growth Options for Yeovil – Sustainability Appraisal Report 30th October 2013)</p>	Noted and disagree. The SA was informed by the Historic Environment Assessment of Yeovil Periphery (July 2010) as well as the Yeovil Peripheral Landscape Study Addendum (Aug 2013), the latter of which considers designated heritage. The appraisal of Option B also took into account previous responses from English Heritage related to proposed development at Area B. The SA found that development at Area B has the potential for a significant medium to long-term negative effect on SA Objective 10 (historic environment). It concludes that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects. In line with English Heritage comments the SA also recommends that any proposal for development in this area should seek opportunities to enhance the setting of the Roman Villa (Dunnock's Lane) and achieve	None.

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			gains through placing interpretation and encouraging community involvement in the management of the Scheduled Monument.	
Jason Hockey (SSDC Comment ID: 756)				
23.1	General	<p>SSDC's Sustainability Appraisal (SA) has been flawed from the beginning (as recognised by the Local Plan Inspector) but also remains fundamentally flawed and unsound;</p> <p>The SA should have been re-written and re-cast by external consultants but SSDC took a partial, inconsistent and muddled approach using external consultants to re-write the section on the Yeovil Urban Expansion but re-writing the Ilminster section in-house using external consultants only to peer review it. This remains a deeply unsound approach;</p>	Opinion noted.	None.
P J Burrows (SSDC Comment ID: 763)				
24.1	General	The conclusion drawn and summarised within Paragraph 2.17 of the consultation document (Ref. 1) is based to a significant degree on the Sustainability Appraisal Report (Ref. 2) with other factors such as deliverability and availability also taken into account. Four areas of the Sustainability Appraisal Report (SA) will be considered:	Noted.	None.
24.2	Appendix II, Multi-site Option, SA Obj 9	<p>9. Protect and enhance the landscape and townscape</p> <p>Ref. 2 Appendix II pll-56 states:</p>	Noted and disagree. The appraisal recognises that this option has the potential for a reduced negative effect against SA Objective 9 during the life of the Plan. The	None.

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		<p><i>The cumulative effect of a number of smaller scale developments on the landscape is difficult to determine as each area that forms part of the Multi-site Option is within a different landscape setting. With this in mind, you could potentially assume that the impact of a number of smaller sites would be less than a larger site within an individual landscape setting.</i></p> <p>It then goes on to consider what may happen beyond the plan period as a result of 'piecemeal stages' rather than 'a single masterplanned form'. However, it is evident that a number of smaller developments would be less detrimental to the landscape and townscape. Also, there is no reason why a number of smaller developments should not be equally well planned, even to take account of future expansion. Integration and mitigation opportunities would be more evident in this case of smaller developments.</p> <p>SA objective 9 should then be rated as less negative for the Multi-site Option than the other options and given the uncertainty that exists could be ranked as "2".</p>	<p>appraisal states on PG. 56 of Appendix II that, "Despite the mitigation provided by Local Plan Policies and available at the project level, it is still considered that there is the potential for a residual minor medium to long-term negative effect on this SA Objective. Compared to the other Options, this Option has less potential for a significant effect during the life of the plan but could have a greater negative effect on landscape in the long-term, after the life of the Plan".</p>	
24.3	Appendix II, Area B, SA Obj 10	<p>10. Historic environment</p> <p>Ref. 2 Appendix II p11-13 states:</p> <p><i>The Historic Environment Assessment of Yeovil Periphery (July 2010) identified this area (study area 3 and 4) as having a moderate to high historic landscape sensitivity and moderate to high historic asset sensitivity. The study concluded that the capacity of this area to accommodate new development without loss or damage to key historic landscape sensitivities and</i></p>	<p>Noted and disagree. The appraisal already recognises that there is the potential for a significant medium to long-term negative effect against SA Objective 10 for this Option. However, there is mitigation available through Local Plan policies and at the project level to address the potential significant negative effects. The appraisal states on PG. 13 of Appendix II that, "It is considered that suitable mitigation is available through the Local Plan and at the</p>	None.

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		<p><i>historic assets is moderate to low.</i></p> <p>It then goes on to state that under this option most of the development will fall within an area which has moderate capacity to accommodate potential new development. However, a development of 1,565 dwellings as a single site within this area is hardly consistent with a "moderate" development capacity within a parish that is currently around 800 dwellings. Further, East Coker Parish contains more than 80 listed buildings and 2 conservation areas. Insufficient weight has been given to protect this historic environment. The impact is "major negative" and the ranking for Option B in this category should be rated as such. This would truly reflect the shortcomings of this option when measured against the objectives of NPPF Section 12.</p>	<p>project level to address the potential significant negative effects, with minor residual negative effects. There is also an element of uncertainty until further until project level surveys and assessments have been completed".</p>	
24.4	Appendix II, Multi-site Option, SA Obj 12	<p>12. Minimise pollution</p> <p>A key parameter within this category is a consideration of the loss of the highest grades of agricultural land. Within the Multi-site Option the distribution of development should at least be such as to avoid the loss of Grade 1 agricultural land. The hierarchy of use should be consistent with NPPF paragraph 112 which states that lower grade land should be used in preference to higher grades. If the distribution of development is performed such as to comply with this objective, the ranking of the Multi-site option should be changed from "Major negative" to "Minor negative". This would probably require that no or very little development takes place within the Option B part of the Multi-site Option.</p>	<p>Noted and disagree. The appraisal recognises that the significance of the effect is dependent on the distribution of development.</p>	<p>None.</p>
24.5	Appendix II,	<p>13 Flooding</p>	<p>Noted and disagree. The appraisal</p>	<p>None.</p>

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	Multi-site Option, SA Obj 13	The SA states that there is an element of uncertainty in the Multi-site Option as the effect is dependent on the combination of sites selected. Given the reduced development in each area, it should be possible to comply with NPPF Paragraphs 99 to 101 and avoid the flood-prone parts of Option C included in the Multi-site option. This parameter would be then ranked the same as the options B and C, i.e. "0".	recognises that the significance of the effect is dependent on the distribution of development and that mitigation could include avoiding development in the areas of high flood risk in area C.	
24.6	Appendix II	Revised Sustainability Appraisal: See attached	Noted. Please see responses to the points above.	None.
Pegasus Planning Group (M Dobson) (SSDC Comment ID: 789)				
25.1	General	<p>Updated Sustainability Appraisal</p> <p>We object on the basis that this Proposed Main Modification is not justified as the conclusions of the additional assessment is considered to be flawed as it fails to properly consider the impact of splitting the housing and employment component into two separate urban extensions; and it fails also to properly consider the environmental consequences of the split site arrangement.</p> <p>Unfortunately, despite being criticized by the Inspector in his preliminary conclusions letter regarding the lack of a robust Sustainability Appraisal (SA), the Council have continued to adopt a muddled and contradictory approach to the assessment of the various growth options. The reasons for this can be seen from the documentation produced by the Council following the last session of the Examination including a further</p>	Noted. The Yeovil Strategic Growth Options SA Report (Oct 2013) addresses the Inspector's concerns and provides a fresh and independent SA of reasonable strategic growth options for Yeovil. This SA Report does not address or screen any proposed changes to the Local Plan. Modifications to the Local Plan are considered through the Local Plan Proposed Main Modifications SA Report (Nov 2013). However, it is agreed that Local Plan Proposed Main Modifications SA Report should contain a screening of the changes to Policies YV1, YV2 and YV6 along with any further appraisal if necessary. It is recognised that the relationship and purpose between the two SA Addendum reports also needs to be made clearer.	Screening of the proposed modifications to Policies YV1, YV2 & YV6 and, if necessary, further appraisal work to be provided within a final SA Addendum Report to accompany the Proposed Modifications on submission. This will clearly set out the sustainability implications of the proposed modifications. Further narrative to

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		<p>Addendum to the Yeovil Peripheral Landscape Study produced for the Project Management Board, Workshop on 25th October 2013, and a subsequent Sustainability Appraisal Report on Strategic Growth Options for Yeovil produced by Enfusion on 30th October 2013 (including an additional Ch4 after the PMB (October 28th) Meeting).</p> <p>As these documents apparently provide the primary justification for the current Proposed Modifications they need to be scrutinized properly to ensure that they represent a proper analysis of the various issues that need to be weighed in the balance when determining the quantum of growth and its proposed distribution. Moreover, it also needs to be borne in mind that such judgements as are made on a variety of factors should broadly conform with the approach previously taken by the Council and other independent assessors, unless there have been any major changes in circumstances since that time.</p>		<p>be provided in final SA Addendum Report to explain the relationship and purpose of the two previous SA Reports.</p>
25.2	Section 4	<p>However, during this process it apparently became clear to the Local Planning Authority that revisions to the SA would necessitate some changes to the overall strategy to the extent that the approach of a Single Urban Extension would be abandoned as would any intention of seeking flexibility of the Plan for the longer term. This involved reducing the overall housing numbers for the SUE and considering whether a split site version would be more appropriate and deliverable within the Plan period. Effectively this approach meant the derivation of a new strategy with revised marking against the SA objectives for the selected strategy. This approach is set out in the revised Sustainability Appraisal Report issued</p>	<p>Noted and agreed. The fresh comparative SA of strategic growth options for Yeovil did not identify a clear preferred option. The Council requested that Enfusion assist to develop further plan-making criteria to help differentiate between the options and inform the decision-making process. The additional criteria formed part of the Council's decision-making process for the Local Plan and are not part of the SA process. Para 4.1 within the SA Report alludes to this but it is agreed that this was not made clear enough in the SA.</p>	<p>A final SA Addendum Report will be prepared and will include a clearer explanation of how the additional decision-making criteria relate to the SA and plan-making processes.</p>

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		<p>for discussion at the PMB on October 25th, 2013. This Report was accompanied by another short paper produced by Enfusion for the 25th October 2013 entitled "Strategic Growth Options for Yeovil – Criteria Assessment Paper". This introduced further assessment criteria into the decision making process although the relationship of these to the original SA objectives is not entirely clear.</p> <p>The precise relationship of these additional factors brought into the decision making process is not explained fully in any of the documentation albeit that the information contained therein is useful.</p>		
25.3	General	<p>The major difficulty which Pegasus Planning has in relation to this exercise is that nowhere in the Sustainable Appraisal Report or in the seven new factors against which the options were assessed, is the selected strategy for two urban extensions (at Keyford and Mudford) adequately assessed, and therefore cannot be robustly justified. The fourth multi-site option addressed in the fourth column of the SA, represents an unspecified quantum of development from each of the four sites, albeit that in the final Non Technical Summary of the Sustainability Appraisal Report (not produced until November 2013) options involving sites within Areas A and C are rejected. Nowhere in this process has the District Council (or its independent advisor) explained the basis on which the multi site option has been appraised and selected through the application of the SA objectives and/or through the new criteria assessment. Indeed, the selected mix involving 800 dwellings at Keyford and 765 at Mudford is not even part of the Sustainability Appraisal exercise which, in any event, is only a broad brush exercise. Notwithstanding</p>	Noted. Please see response to Rep ID 25.1.	Please see proposed changes for Rep ID 25.1.

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		<p>this, we would have expected to have seen set out clearly in the documentation the reasons why the Council abandoned the SUE approach and decided to opt for the two site approach; and the reasons why it selected Keyford and Mudford and the proposed split in the allocations that has been selected.</p>		
25.4	Appendix II	<p>SA Scoring Review</p> <p>In light of the deficiencies identified above and given that we still support the proposal for the urban extension at Keyford (south of Yeovil) for reasons which are outlined below, we have decided to undertake the SA exercise ourselves and "re-mark" the whole exercise. This involves not only looking specifically at the points raised by the Inspector but also looking at a number of the other SA objectives which we believed were incorrectly marked in the first place. Given that the Planning Authority has decided to change the basis of the Plan we feel that such an approach is fully justified.</p> <p>We have also taken the opportunity to have full regard to the comments of the previous Local Plan Inspector, this is considered particularly important given the lack of any proper consideration of this in the latest assessment produced on behalf of the Planning Authority. Furthermore, a review of the previous Inspector's comments is highly relevant especially given that the Planning Authority opposed the release of the Keyford site at that time. Given that this earlier approach of the Planning Authority was not accepted by the Local Plan</p>	<p>Noted. Please find our responses below to the revised scoring submitted in the Appendix.</p> <p>SA Objective 1: Noted and disagree. On Pg. 3 of Appendix II the appraisal states, "This option is slightly closer to the Town Centre compared to the other options; however, this is not considered to be of significance when considered alongside the potential provision of services/ facilities. Compared to the other options, this option does not perform significantly better or worse in terms of access to facilities and services".</p> <p>SA Objective 5: Noted and disagree. The evidence¹¹ suggests that a single site option of 1,565 dwellings is unlikely to result in the provision of any significant new education facilities, such as a secondary school.</p> <p>SA Objective 7: Noted and disagree. The</p>	None.

¹¹ Para 2.13 of the Proposed Main Modifications Consultation Document (November 2013) and Somerset County Council PMM Representation (Comment ID 555).

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		<p>Inspector it is relevant to look at his conclusions as opposed to the approach taken by the Authority at that time. This particularly applies in respect of landscape and visual impact which was the subject of a very detailed analysis at the last Inquiry. It is also relevant to note that the previous Local Plan Inspector made comments not only on the Keyford site but also in relation to a large number of other omission sites some of which related to development on the north side of the town in the vicinity of Mudford.</p> <p>Our SA scoring review which is provided as an appendix to these representations seeks to demonstrate how our assessment compares with that undertaken on behalf of the Local Planning Authority. There are considerable disparities in the scoring as set out on the scoring matrix which can be accounted for as a result of a correct and proper consideration of the conclusions of the previous Local Plan Inspector. To simply ignore these informed and independent conclusions does, in our view, undermine the validity and accuracy of the Planning Authority's assessment against the SA Objectives. Furthermore, our analysis also considers with more rigour how the multi-site options should score against the SA objectives, an analysis which is lacking in the Planning Authority's own assessment. Upon review of the scoring for the various multi-site options it is clear that there is no compelling justification, in terms of such options scoring better than a single site option, to warrant the abrupt change in approach set out in the Proposed Modifications to Policy YV2.</p> <p>In light of this and other deficiencies identified above we conclude that the District Council has failed to</p>	<p>SA considers that all of the options have the potential to deliver 5ha of employment land as set out in Local Plan Policy SS3, with the potential for a minor long-term positive effect on the economy. It was considered that none of the options performed significantly better or worse against SA Objective 7.</p> <p>SA Objective 10: Noted and disagree. The SA has taken a balanced approach to the comparative appraisal of reasonable options. The SA concluded that there is the potential for residual negative effects on Landscape for Area B; therefore, even when after considering mitigation there is still the potential for residual negative effects on heritage.</p> <p>SA Objective 13: Noted and Disagree. Development in other option areas could also potentially address site specific flooding issues.</p> <p>SA Objective 14: Noted and disagree. The SA has taken a balanced approach to the comparative appraisal of reasonable options. There is the potential for development in any of the area options to result in biodiversity improvements.</p>	

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		<p>undertake a proper review of the Sustainability Appraisal to inform the latest version of the Local Plan and further work needs to be undertaken in order to remedy this deficiency.</p> <p>SA Objective 1: Suggest changing Option B from a '0' to a '++'. Suggest changing Option C, D and Multi-site from a '0' to a '+'.</p> <p>SA Objective 5: Suggest changing all options from a '0' to a '++'.</p> <p>SA Objective 7: Suggest changing Option B from a '+' to a '++'. Suggest changing Option C from a '+' to a '0/+'. Suggest changing Option D from a '+' to a '0'.</p> <p>SA Objective 10: Suggest changing Option B from a '-/0' to a '-/0'. Suggest changing Option C and from a '0' to a '0/0'. Suggest changing Option D from a '-/0' to a '0/0'.</p> <p>SA Objective 13: Suggest changing Option B from a '0' to a '+'.</p> <p>SA Objective 14: Suggest changing Option B from a '0' to a '0'.</p>		
25.5	General	<p>Consistency in the assessment process</p> <p>Consistency in decision making extends to the appraisal and site assessment process and is fundamental to the soundness of the Local Plan. We have already set out above how the proper consideration of the conclusions of the previous Local Plan Inspector impacts on the SA</p>	Noted. Please refer to the responses above.	None.

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		<p>scoring matrix. In addition to this it is worth emphasizing that the area now being promoted in the Proposed Modifications for development at Keyford amounting to 800 dwellings and 2.5 hectares of employment together with a Neighbourhood Centre and other supporting uses, is almost identical to a scheme (save for a small addition of a triangular field to the South of Plackett Lane), which was favourably considered by the last Local Plan Inspector in 2002/3.</p> <p>The previous Inspector's assessment dealt effectively with a range of environmental issues such as landscape and visual impact, sustainability, agricultural and prematurity. His conclusions on each of these issues, which all need to be weighed in the balance together as regards the Keyford site, were as follows:-</p>		
25.6	Appendix II, Area B, SA Obj 9	<p>Landscape:</p> <p>Turning to the specifics of this site, it is located on the southern sloping dip slope outside of the natural containment of the east- west scarp. Despite this southerly extension beyond the east-west escarpment, I do not consider that this represents a fundamental objection. In my view this escarpment is relatively less sensitive than that to the north of the town. It has already been breached by the adjoining area of housing. The site adjoins the A37, a major route into the town, where the character is very much that of a gateway, an entrance into the main built-up area. The modern roundabout, the rugby club lights and other features signal that one is entering the town. The objection site itself is for the most part well screened from this road. Further, although parts of the site are fairly</p>	<p>Noted. The SA was informed by the Yeovil Peripheral Landscape Study Addendum (August 2013). The SA found that taking mitigation into account there is the potential for a residual minor medium to long-term negative effect on landscape as a result of development in Area B.</p>	None.

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		<p>prominent in the wider landscape and are visible from wider views from the west, the south and the east, these views are not especially sensitive, important ones. <u>The fact of visibility does not equate with them not being suitable for development.</u> (Our emphasis)</p> <p>The site would be seen in the context of development already spilling over the shoulder of land. Although new development would be clearly visible from some directions the division between developed land north of the shoulder of land and fields to the south is a blurred one. The proposals would tilt the balance towards a greater presence of built development. <u>However, neither the quality of the site itself or that of the wider landscape is such as to render that unacceptable. It should not have a harmful impact upon the setting of the historic landscape associated with Barwick Park; Stoford, North Coker and East Coker Conservation Areas, nor the listed building, Keyford House.</u> (Our Emphasis)</p>		
25.7	Appendix II, Area B, SA Obj 10	<p>Coalescence:</p> <p>It should not have a harmful impact upon the setting of the historic landscape associated with Barwick Park; Stoford, North Coker and East Coker Conservation Areas, nor the listed building, Keyford House. <u>I do not believe that the development of this land would lead to actual or perceived coalescence between the main built-up area of Yeovil and the nearby villages. Sufficient physical and visual separation would remain.</u>(Our Emphasis)</p>	Noted.	None.
25.8	Appendix II, Area B	<p>Setting of Yeovil</p> <p>Although it would extend development out and away</p>	Noted.	None.

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		<p>from the existing built-up edge, in my opinion extending development southwards in this form <u>offers a relatively soft option, without causing unacceptable harm to the setting of the town. I do not believe that the development of this land would lead to actual or perceived coalescence between the main built-up area of Yeovil and the nearby villages.</u> Sufficient physical and visual separation would remain. The site is contained within well defined limits, by existing highways. In landscape terms it falls into two principal elements as described in the council's Keyford Landscape Assessment 2000: small scale, well-vegetated plateau head fields on the urban fringe, with more open, larger fields to the south.</p> <p>Provided that a) development respected that broad division, limiting potentially more obtrusive larger-scale employment buildings mainly to the lower, less visually prominent parts of the site, b) that the built form respected the small scale nature of the northern part and c) the hedgerows and trees are retained and supplemented, then I consider development could be assimilated into the landscape without causing unacceptable harm. Similarly, <u>I consider that the archaeological interest on the site can be assimilated within the overall development without its integrity being compromised.</u> (Our emphasis)</p>		
25.9	Appendix II, Area B	<p>Sustainability</p> <p>I was presented with a great deal of detailed evidence on the accessibility of this and the other Key Sites to various facilities in the town. On a general point, on a district-wide perspective, a location on the edge of Yeovil is likely to be substantially more sustainable than</p>	Noted.	None.

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		<p>locations away from the town. As an urban extension it respects the advice in paragraph 66 of PPG3. The comparative evidence suggests to me that the site offers a sustainable location for peripheral development. In comparative terms <u>it holds up very well compared with the plan's three Key Sites</u>. It is substantially better than the Lufton site, which is located significantly further from the town centre. <u>It also scores well in comparison with the Thorne Lane and Lyde Road sites</u>. The route into and out of town from Keyford is not a level one. Walkers and cyclists would be faced with fairly significant gradients which <u>may put off less robust residents from making their journeys by foot or cycle</u>. <u>Nevertheless, the site still remains a sustainable location</u>. I do not approach this objection on the basis of whether it should replace one of the plan's Key Sites. Rather, because of the need to further concentrate development in the town, additional suitable sites should be considered. If there has to be peripheral greenfield development around the town, then <u>this is an acceptable and sustainable location</u>. (Our Emphasis)</p>		
25.10	Appendix II, Area B, SA Obj 12	<p>Agricultural Land</p> <p>A major, and significant objection remains: that the site is classified as being Grade 1 agricultural land. National and local policies <u>no longer prescribe an absolute ban on developing such land</u>. Yeovil is located within an area of high quality agricultural land, with much of it being grades 1 and 2. It is <u>inevitable that if Yeovil is to expand it will require the loss of such land</u>. Other land, to the west side of the town may offer a lower, but still high, quality locations for development. However, that land appears to suffer from other significant restraints in</p>	Noted.	None.

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		relation to the landscape of Brympton D'Evercy. (Our emphasis)		
25.11	General	<p>Conclusions</p> <p>It seems to me that in drawing together the advantages and disadvantages of development of this site, the former are <u>much weightier than the latter</u>. On balance, I find that there are <u>compelling advantages</u> in increasing the amount of employment and residential land in the town by allocating this site. In conclusion, I come firmly to the view that there is a need to identify an additional Key Site to both provide a high quality employment site and add to the concentration of new housing on the town. (Our Emphasis)</p> <p>It must be remembered that at that time the Council were firmly opposed to development on any further sites (Key Sites or smaller within Yeovil) and steadfastly rejected further growth on grounds of landscape and visual impact as well as the setting of the town. We have noted that Mr. Robert Archer's evidence at that Inquiry is identified on the Council's web site as being part of the evidence base for this Local Plan. However, it is as well to point out that not only the Council's Keyford Landscape Assessment, but also various other comprehensive Landscape Appraisals, considered the suitability of the Keyford site. Moreover, Mr Archer's evidence to that Inquiry was completely rejected by the Local Plan Inspector albeit as demonstrated above, ultimately the Council chose to ignore the Inspector's recommendations and promoted yet another option as a Key Site (at Bunford Hollow) through yet a further set of Proposed Modifications to the Plan – delaying its final</p>	Noted. Please see the previous responses above.	Please see the changes set out above.

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		<p>adoption by a further 2 years.</p> <p>Notwithstanding this, the previous Inspector's conclusions, on exactly the same issues, are as true today as when he penned them over 10 years ago. If anything the weight given to issues such as agricultural land as a result of Government policy changes are less now than they were in 2002 when the previous Inspector reported. At that time PPS7 was relevant (protecting Best & Most Versatile Land) whereas now the NPPF merely states (Paragraph 112) that authorities should seek to use areas of poorer quality land in preference to higher quality land. However, it is also clear from the NPPF that this is only one of the environmental issues to be weighed in the balance and that the document needs to be read as a whole.</p> <p>In this context it is clear that the last Inspector accorded different weight to different factors and in particular to the breaching of the northern ridgeline which currently provides the northern edge to the town. He states in numerous parts of his report that he regarded any development on the steep north facing scarp slopes as having a substantial adverse effect on the open character of the countryside and on the setting of the town. We refer specifically to Paragraphs 7.2.1 and 7.4.1 which deals with two sites in the vicinity of the Mudford Road which state:</p> <p>"7.2.1 . . .The land falls quite steeply to the north. The sites are undeveloped and present an open character, allowing long views down and across to the countryside beyond. Development on this scarp head would be prominent and would consolidate the ribbon of</p>		

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		<p>development along Primrose Lane. In so doing it would alter the balance between the built form of the town and its countryside setting when viewed both from nearby and from longer distant locations to the north. I am satisfied that the Development Area boundary properly excludes land on the north side of Primrose Lane. In my view the development of either site would harm the existing character and appearance of this edge of the town."</p> <p>"7.4.1 . . . Elsewhere I have commented on the importance of not breaching the scarp head that encloses Yeovil on its north side without very strong grounds. In my opinion, development of this site would cause considerable harm to the visual containment of the town; infringing the natural containment of the lie of the land and so unbalancing the sensitive relationship between the edge of the town and the open countryside beyond. In the absence of any compelling, strategic reason to consider expansion of the town in this direction I am firmly of the view that this site should not be included within the town's Development Area boundary."</p> <p>Generally his comments on the northern scarp accord with the Landscape Studies undertaken by the District Council at that time and again remain as true today as they did 10 years ago.</p> <p>The clear approach of the last Inspector contrasts with the approach taken by the Council not just on the submitted version of the Plan but also with the lack of transparency on the emergence of the current proposals which splits the SUE into two parts – 800 at</p>		

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		Keyford with 750 at Mudford. The major problem arises because, despite the criticisms from the current Inspector, there is still no clear reasoning as to how and why the two proposals have emerged in the way they have; and no clear marking of the proposals in the SA itself.		
CPRE Somerset (SSDC Comment ID: 813)				
26.1	Appendix II, Area B, SA Obj 12	5 CPRE welcomes the acceptance by SSDC that the proposed development at East Coker would destroy Best & Most Versatile (BMV) farmland as well as affect heritage assets and landscape. SSDC seeks to reduce the overall loss by cutting the number of new dwellings on greenfield land from 2,500 (of which 935 would in any case have applied to the next Plan period) to 1,565, of which 800 would be at East Coker and 765 at Mudford. It is understood that much of the Mudford site is BMV land, though perhaps of a lower grading than at East Coker.	Noted.	None.
Charles Bishop Ltd (JB) (SSDC Comment ID: 849)				
27.1	General	<p>Introduction</p> <p>I am writing on behalf of Charles Bishop Limited who have relevant land interests in the Keyford area, and also on my own personal behalf.</p> <p>Summary</p> <p>We consider the modification to Policy YV2 to be 'Not Justified', simply because inadequate justification appears to have been given for the change from one</p>	Noted. Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil. It was considered that areas should not be rejected because they could not meet the Local Plans aspirational target of 2,500 dwellings. To ensure a fair and robust comparative appraisal, reasonable options were identified that could accommodate the objectively assessed need of 1,565 during the life of the Plan.	Screening of the proposed modifications to Policies YV1, YV2 & YV6 and, if necessary, further appraisal work to be provided within a final SA Addendum Report to accompany the Proposed

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		<p>Sustainable Urban Extension (SUE) to two.</p> <p>It also seems that very little specific justification been given for the choice of the two smaller Sustainable Urban Extensions.</p> <p>We can also find no justification for the reduction in dwelling numbers from 2500 to the Plan Period figure of 1565 dwellings. Our understanding of the Inspector's preliminary findings that he was anticipating that the revised Sustainability Analysis (SA) would either confirm or provide an alternative location (or locations) for the 2500 dwelling figure, rather than a reduced figure of 1565 dwellings.</p> <p>Essentially, while we fully support the proposal to site the 800 dwelling SUE at Keyford, we are concerned that the Council have not produced an SA specifically targeted at this reduced size scheme. We have therefore produced such an analysis, and have appended it to this representation.</p>	<p>The Yeovil Strategic Growth Options SA Report (Oct 2013) addresses the Inspector's concerns and provides a fresh and independent SA of reasonable strategic growth options for Yeovil. This SA Report does not address or screen any proposed changes to the Local Plan. Modifications to the Local Plan are considered through the Local Plan Proposed Main Modifications SA Report (Nov 2013). However, it is agreed that Local Plan Proposed Main Modifications SA Report should contain a screening of the changes to Policies YV1, YV2 and YV6 along with any further appraisal if necessary. It is recognised that the relationship and purpose between the two SA Addendum reports also needs to be made clearer.</p>	<p>Modifications on submission. This will clearly set out the sustainability implications of the proposed modifications. Further narrative to be provided in final SA Addendum Report to explain the relationship and purpose of the two previous SA Reports.</p>
27.2	General	<p><u>Justification for the two individual Urban Extensions</u></p> <p>While the Council 's consultants Enfusion have provided extensive SA data on the range of large site options, it appears that this work was not repeated for either of the smaller SUE options, either before or after the decision was taken to pursue the two SUE option.</p> <p>With landholdings at Keyford, our interest is clearly centred on that area. The reduced scale scheme for 800 units now proposed for the area closely equates with that considered by the previous Inspector at the 2001</p>	<p>Noted. Please see the response above (Rep ID 27.1).</p>	<p>Please see the changes set out above (Rep ID 27.1).</p>

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		<p>Inquiry, Mr David Fenton, and recommended for allocation by him in his 2003 Report.</p> <p>The reduced scale Keyford scheme fits well within the bounds of the existing urban edge along East Coker Road and Lower East Coker Road, and also within a boundary formed by tree and hedge lined local roads, namely the A37 and Pavyotts Lane.</p> <p>Although the Council did not accept the findings of the 2003 Inspector's Report owing to there being no need for more residential development land at the time, the conclusions set out in the Inspector 's 2003 Report effectively provide a number of independent and tested responses to many of the Sustainability Objective questions which would apply in respect of a dedicated SA carried out specifically in respect of the proposed 800 dwelling Keyford scheme.</p>		
East Coker Parish Council (SSDC Comment ID: 922)				
28.1	General	<p>This document contains the East Coker Parish Council response to the proposed main modifications. Our correspondence, submissions and discussions have been consistent and supported with evidence and previous submissions remain extant. The responses to the current proposed main modifications and underpinning documentation are detailed in supporting appendices /enclosure with this covering letter.</p> <p>It is welcomed that South Somerset District Council agreed the Inspector's preliminary findings and his concerns. The timescales to undertake updates to the</p>	Noted. Please see the responses to the individual points below.	None.

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		<p>Yeovil Peripheral Landscape Study 2008 and the re-assessment of the Yeovil Growth Options Sustainability Appraisal was recognised by the Planning Inspector as challenging and he sought reassurance that it was achievable (Planning Inspector letter to SSDC dated 17 July 2013).</p> <p>The Parish Council considers that:</p> <ul style="list-style-type: none"> • South Somerset District Council (SSDC) has still not applied sufficient weight to the protection of high quality grade 1 agricultural land as required by paragraph 112 of the National Planning Policy Framework (NPPF) and respond fully to the Inspector's concerns. • The Landscape Study and its Addendum has not been consistent in assessing the periphery of Yeovil and does not adequately reflect important elements of landscape. These include impacts on the historic environment, agricultural land quality and biodiversity. • Although the re-assessed Sustainability Appraisal (SA) is more robust than previous versions it has not brought out some important and relevant material evidence. There was a greater range of reasonable alternatives than presented. The opportunity was missed to complete a full SA of the 360 degree Yeovil periphery, which would have provided a clear analysis across the 14 objectives. • There is strong evidence that supports a genuine multi-site approach rather than a two site Urban Extension. • Consequently there remain aspects of the Inspector's concerns that need to be more fully and adequately addressed. 		
28.2	General	The Main Modification's supporting documents do not	Noted and disagree. Please see the	Noted.

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		<p>appear to fully address the concerns expressed by the Planning Inspector (Planning Inspector Preliminary Findings) as detailed:</p> <ul style="list-style-type: none"> • The lack of weight attached to the requirement to use areas of poorer quality agricultural land in preference to that of higher quality (bearing in mind that once lost such high quality land cannot be retrieved); • The lack of substantive evidence to demonstrate that there are significant differences in terms of landscape impact between several of the options that have been considered. Opportunities for mitigation, primarily through layout and design do not appear to have been sufficiently addressed; • Lack of consistency regarding the consideration of protecting and enhancing the historic environment; and, • Lack of clarity regarding the scoring for objective 14- conserving and enhancing biodiversity and geodiversity. 	<p>responses to the individual points below.</p>	
28.3	General	<p>The comments made in this submission are complementary to the submission made by the Parish Council at the June 2012 consultation. The four significant points of concern raised by the Inspector are issues that broadly reflect the concerns raised by this Parish Council.</p> <p>The compliance review undertaken by the SSDC consultants broadly reflect that the District Council complied with their statutory requirements but identified several areas requiring attention. These should be progressed as a matter of urgency.</p> <p>The Yeovil Growth Options Sustainability Appraisal Report</p>	<p>Noted. Please see the responses to the individual points below.</p>	<p>Noted.</p>

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		confirms that the earlier Growth Option Sustainability Appraisals were not sufficiently robust and recognises the Inspector's views in that respect. While the Parish Council welcomes this confirmation there are remaining issues, raised by the Inspector, which have not been adequately addressed within the re- appraisal and supporting documents. We bring forward other issues which will allow the SA to be strengthened in order to ensure it is fit for purpose. The main concerns are summarised as follows, further detail of these can be found in the Parish Council's supporting documents:		
28.4	Appendix II, Area B, SA Obj 12	<p>Agricultural Land- weighting</p> <p>The Sustainability Appraisal refers to best and most versatile land and the grading recognising the irreversible loss of the highest grade and this cannot be mitigated. There is no recognition within the Appraisal that national policy (NPPF, paragraph 112) is explicit in that "...local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." SSDC has not made full use of the lower grade agricultural land available, nor taken due regard of the economic benefits of the highest quality agricultural land.</p> <p>Neither the Yeovil Peripheral Landscape Study (PLS) nor the Landscape Addendum refers to the classification of agricultural land or soil quality and thus, in landscape terms, they were not considered when assessing impact and the capacity to develop. It is of concern that the</p>	Noted. The NPPF defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The evidence ¹² shows that each of the reasonable options contains best and most versatile agricultural land. In recognition of the evidence and the Inspector's comments the SA distinguished between the grades and states in Para 3.32 of the SA Report that development within option area B, "would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long-term negative effect on this SA Objective. Compared to the other options, this option has the potential for the greatest loss of the highest grade of agricultural land". The loss of Grade I agricultural land was one of the reasons	None.

¹² South Somerset District Council Local Plan Evidence Base. Core Document 135: Agricultural Land Classification Maps - Yeovil. Available online: <https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/evidence-base/yeovil-specific-documents/>

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		author of the Landscape Addendum advised the SSSC Suspension Board Meeting of 25th October 2013 (draft minutes, paragraph 10) that the Inspector's concerns regarding agricultural land quality had been taken into account, but this clearly was not the case. The lack of weight attached to seeking poorer quality agricultural land as raised by the Inspector has not been addressed.	that the Council decided to reduce the level of development proposed in Area B.	
28.5	Appendix II, Area B, SA Obj 9	<p>Landscape Impacts - substantive evidence</p> <p>The Inspector gave weight to earlier landscape evidence supporting the last local plan and concluded that he agreed that land at Keyford was clear to view from a number of sensitive local vantage points, that development would be 'incongruous' and 'intrusive' and that development may be visually prominent from some viewpoints. The addendum suggests that the public perception of the visual envelope associated with the Coker option is limited to a local view only. We do not agree with this point.</p> <p>The Keyford area, for example, is visually prominent from the Grade II* listed St Michael's Church with established national /international cultural and literary importance. There is no assessment of impact on the setting and visual amenity from the Church, the Grade I listed Coker Court and associated historic medieval deer parkland on the northern slopes of Coker Hill. Several well used public rights of way (PROW) cross the land between Darvole and Inglemount and there is little reference to the impact from these public receptors (Enclosure: East Coker Rights of Way Map and sample walk). Overall the addendum fails to correctly assess and provide the substantive evidence sought by the Inspector.</p>	Noted and disagree. The SA was informed by the Yeovil Peripheral Landscape Study Addendum (Aug 2013), which found that development in this area could have significant landscape and visual effects. Taking mitigation into account the appraisal concluded that there is the potential for a residual minor medium to long-term negative effect on landscape. The method used in the Yeovil Peripheral Landscape Study Addendum was subject to review by an independent Chartered Landscape Architect. The findings and recommendations of the review were taken into account and informed the final Yeovil Peripheral Landscape Study Addendum (Aug 2013). It should be noted that SA/SEA provides a high level strategic appraisal of reasonable alternatives. It is important that the SA is proportionate to the level of plan-making and decision-making, and that SEA does not duplicate or pre-empt lower level assessment at EIA and the ES that accompanies a project level planning application.	None.

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28.6	Appendix II, Area B, SA Obj 10	<p>Consistency- protecting and enhancing the historic environment.</p> <p>The Inspector was concerned about inconsistency when considering the Historic Environment (Historic Environment Assessment of Yeovil Periphery July 2010) and how the SA scored the whole northern option the same as Option 10 (Keyford/Barwick) which contained a Scheduled Monument (SM). Neither the Landscape Addendum nor the SA addresses this issue satisfactorily. In attempting to address the Inspector's concern SSDC has sought to remove the north escarpment (Thorne Coffin to Mudford) from consideration on visual amenity grounds, without addressing the issue of the inconsistency as raised by the Inspector.</p> <p>The Coker option (Historic Environment Assessment (HEA) areas 3 and 4) was identified as having moderate development capacity while the north escarpment (HEA areas 12 through 15) had high or moderately high capacity as recognised by the Inspector. The HEA was not referred to in either the Landscape Addendum or the SA and the inconsistency in how these were assessed has not been addressed. There appears to be no integrated landscape approach to bringing the various elements of landscape (visual sensitivity, agricultural land quality, historic environment character and biodiversity) together to assess how, for example, visual impact measures against the other impacts.</p> <p>In the Landscape Addendum there remains inconsistency in approach between the two significant areas of heritage assets, East Coker and Montacute. Both have outstanding designated outstanding heritage</p>	<p>Noted and disagree. The Historic Environment Assessment of Yeovil Periphery (July 2010) is referred to and referenced in Appendix II of the SA Report on Pgs. 12, 29, 43 and 57. The Yeovil Peripheral Landscape Study Addendum (Aug 2013) considers sensitive receptors, which includes designated heritage.</p> <p>The SA was informed by the Historic Environment Assessment as well as the Yeovil Peripheral Landscape Study Addendum. The appraisal of Option B also took into account previous responses from English Heritage related to proposed development at Area B. The SA found that development at Area B has the potential for a significant medium to long-term negative effect on this SA objective. It concludes that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects.</p> <p>The reasons for why other areas were either rejected as not reasonable or rejected through plan-making are clearly set out within Section 3 of the Yeovil Strategic Growth Options SA Report (Oct 2013).</p>	None.

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		<p>assets.</p> <p>The Montacute setting impact on the NW/Lufton area appear to be over emphasised (comparing the Landscape Addendum to the HEA) while there appears an under emphasis of the impact on heritage settings in the Coker Option. Twelve listed buildings are located within the Coker search area as well as the Scheduled Monument; other significant assets are in the immediate locality but have not been considered. Heritage assets in close proximity to potential development land include, but are not limited to, the Roman Villa Scheduled Monument and Grade II listed Keyford House. The overall consideration places undue weighting to the subjective visual relationship between the NW/Lufton area and Montacute.</p>		
28.7	Appendix II, Area B, SA Obj 14	<p>Lack of clarity-objective 14 conserving and enhancing bio/geodiversity</p> <p>The Inspector identified that the objective only referred to Options 8, 10 and 11 while the northern option was not referenced. He also queried why the proposed mitigation measures could not equally relate to this area. However, the revised SA did not consider the north-western option and therefore did not allow a comparison of impacts on biodiversity and mitigation measures. The revised SA repeated the assessment of biodiversity impact from earlier SA's and the conclusion that these impacts could be adequately mitigated. However, it did not consider additional detailed evidence of Noctule Bats, Sandy Stilt Puffball and the potential of Great Crested Newts within the Coker option as identified in the scoping report (Eco-Town</p>	<p>Noted. The reasons why the north-western option was not considered reasonable and therefore not subject to appraisal through the further SA work are set out in Section 3 of the Yeovil Strategic Growth Options SA Report (Oct 2013).</p> <p>The SA has taken a consistent approach to the appraisal of Options against SA Objective 14. The findings of the Eco-Town Biodiversity Baseline Scoping Report (July 2010) do not significantly affect the findings presented in the Yeovil Strategic Growth Options SA Report (Oct 2013). Further, more detailed project level assessments would confirm the presence of important species and habitats and set out measures</p>	None.

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		Biodiversity Baseline Scoping Report - July 2010.) This additional in-depth study should have been recognised in the SA scoring and commentary but was not. Therefore the SA has not adequately considered the range of bio diversity within the Coker Option or addressed the Inspector's concern regarding consistency of assessment.	to mitigate any significant impacts.	
28.8	Appendix II, Area B & D, SA Obj 9	<p>Landscape Architect-Brief to Project Management Board dated 30 October 2013 (PMB Summary report presented to DX meeting 7th November 2013.)</p> <p>The balance of development recommended within the landscape architect's brief appears not to be based on evidence or accord with the findings of the SA Report and does not reflect national policy. There are potential mitigations available for the Upper Mudford option as well as maximising enhancement by linking into the Lyde key-site development. The impacts and limited opportunities for mitigations should have reflected a lesser development footprint in the Coker area than detailed in the direction of growth map and therefore a significantly lower dwellings figure than the recommended 800 for the Coker option should be applied.</p>	Noted and disagree. The Yeovil Peripheral Landscape Addendum (August 2013) considers potential mitigation measures for development and the residual effects, this includes Area D. This study informed the SA of reasonable options for strategic growth in Yeovil.	None.
28.9	General	<p>Conclusion</p> <p>It is concluded that neither the Landscape Addendum nor the Sustainability Appraisal for Yeovil Strategic Growth Options have fully addressed the concerns raised by the Inspector in his preliminary findings. Therefore the East Coker Parish Council objects to the Main Modification as proposed.</p>	<p>Noted and disagree. The majority of these points are matters for the plan-making process not the SA.</p> <p>The fresh and independent SA of reasonable options addresses the Inspector's concerns and meets legislative requirements.</p>	None.

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		<p>High quality agricultural land (grade I) is one resource that cannot be mitigated and therefore if applying the landscape architect's logic of avoiding what cannot be mitigated then the Coker Option should have been screened out.</p> <p>East Coker Parish Council maintains that the evidence strongly supports a multi-site approach to development. The benefit of a number of smaller sites minimises known and objectively assessed significant impacts in any one location and far outweighs the perceived /potential opportunity gains in terms of critical mass from a single/dual site. CIL will play a role in establishing facilities where they are required without all sites having to be considered as strategic. Smaller sites could have reduced infrastructure requirements and needs arising from new development could be accommodated through enhancements to existing infrastructure and facilities, rather than the need for significant new additional infrastructure and facilities.</p> <p>Provision of 800 dwellings to the south of Yeovil is not agreed. The recommendation was not based on objective evidence but relied heavily on subjective judgement; the Parish Council considers the judgement was not well founded. It would not be reasonable to plan for this level of development to the south given that there is little opportunity to mitigate impacts on the visual amenity and heritage assets and no opportunity to mitigate loss of grade 1 agricultural land which should be conserved for future food production.</p> <p>The Main Modification should reflect an increase in the</p>		

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		<p>dwelling provision within the Yeovil Urban Framework to the level detailed in the June 2012 submission (6,250) with a commensurate reduction (approximately 400) from Greenfield requirements that impact on grade 1 agricultural land.</p> <p>If the Main Modification remains a two strategic site solution it would be in danger of not addressing the Inspectors main concerns. If considered acceptable by the Inspector it is recommended that the Local Plan should identify the north east as the predominant direction of growth maximising opportunity for the enhancement of the Lyde key site development with the associated lesser overall impact.</p> <p>In light of the issues brought forward in this submission the sound solution would be to establish four or more multi-site locations which could be brought forward as a Main Modification without compromising the whole localplan.</p>		
28.10	Para 1.9	<p>Appendix 3. Comments on Strategic Growth Options for Yeovil Sustainability Appraisal Report 30 Oct 2013</p> <p>Paragraph 1.9 indicates the SA was based on evidence available but it appears the appraisal does not reflect or refer to some material evidence, for example, but not limited to the Eco-Town Biodiversity Scoping Report or Somerset County Council Future Transport Plans for Yeovil.</p>	<p>These pieces of evidence do not significantly affect the findings set out in the Yeovil Strategic Growth options SA Report (Oct 2013).</p>	None.
28.11	Para 3.2	<p>Paragraph 3.2 - suggests the Inspector raised the issue of "a lack of comparative significance between high and low quality agricultural land" this is not the issue</p>	<p>Noted. The key point raised by the Inspector was that there were inconsistencies in the scoring and</p>	None.

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		raised by the Inspector which was "lack of weight attached to the need to seek to use areas of poorer quality in preference to higher quality ...". It is not at all clear why the Inspector's straight forward comments which reflect NPPF para 112 have been re-phrased.	insufficient weight given to agricultural land quality. These issues have been addressed through the further SA work.	
28.12	Para 3.3	Paragraph 3.14 - Table 3.1 - The report seeks to show how the decision for rejecting or taking forward options developed. The Parish Council highlighted serious concerns with the developing SA between December 2009 and August 2010. In terms of the SSDC process of Plan-Making the removal of options 4 (Luffton West) and 7 (Combe Street Lane/Mudford) have continued to be challenged and the justifications for such decisions were not robust. Even within this re-appraisal there is no sound reasoning for the Northern Options to be discounted or why they should have been considered solely as a comparator in earlier iterations rather than as an intrinsic part of a full appraisal.	Noted and disagree. Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil as well as the reasons for why some areas were rejected as not being reasonable.	None.
28.13	Para 3.17	<p>Para 3.17 - It is concern that post hearings in July/August constraints were solely reconsidered by Officers, which given the circumstances of the Inspector's findings, it would have been appropriate for constraints to be reconsidered independently.</p> <p>The consultants indicate that Landscape Sensitivity and Capacity was a key concern identified by the Inspector, leading to more detailed landscape studies which informed the choice of options. However other key concerns of the Inspector such as the lack of weight attached to high quality agricultural land or assessment of biodiversity impact are not referenced.</p>	Para 3.21 of the Yeovil Strategic Growth Options SA Report (Oct 2013) states that, "Council Officers and the SA specialists held a roundtable workshop on 3 September 2013 to identify realistic options that could provide this level of development". Agricultural land quality was also considered along with a number of other constraints, such as flooding and designated heritage.	None.

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28.14	Paras 3.19, 3.20, 3.26 & Chapter 4	The consultant's published their Sustainability Report on 4 th October 2013; subsequently post October PMB meetings an updated report was published on 30 th October 2013. The update indicated that Chapter 4 'Strategic Options Assessment in Plan Making' was added. Not referred to, but also added, were new paras 3.19 and 3.20 while para 3.26 (previously 3.24) was also amended. While these amendments appeared at first sight to be minor textual changes they in fact have potential; significant impact as they seek to remove the North and Northwest of Yeovil from any future development in this plan period or in future plans. East Coker Parish Council considers these changes are inappropriate, not evidence based and should be removed.	<p>Noted and disagree. The introduction of Paras 3.19 and 3.20 and amendment of Para 3.24 sought to take account of discussions at the PMB meetings on 14th and 25th October 2013. The Board was of the opinion that further clarity was required to explain why certain areas were not considered reasonable and therefore not subject to appraisal¹³. Paras 3.19 and 3.20 are clearly based on evidence, which is referenced within the footnotes.</p> <p>Section 4 was included to clearly set out the Council's reasons for the selection/rejection of reasonable options in plan-making.</p>	None.
28.15	Para 3.20	The new paragraph 3.20 attempts to justify removal of the North Escarpment on grounds of low or moderately low capacity however the Landscape Addendum and PLS are disputed and the reasons for removal are unfounded. There is significant development opportunity detailed in the SHLAA 2013. East Coker Parish Council has challenged the landscape rationale for removal in their comments to the Landscape Addendum.	Noted. This is a matter for the Council and the Yeovil Peripheral Landscape Addendum Study (August 2013). The A359 was identified by the Council's Landscape Architect as a natural landscape boundary to option area D. '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.	None.

¹³ Local Plan Suspension Programme Project Management Board. Notes of Meeting Held on 14th October 2013. Available online: http://www.southsomerset.gov.uk/media/596785/pmb14octnotes_3_draft.pdf

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28.16	Para 3.22	Para 3.22 - Considering the need for a comprehensive re-appraisal of the SA it is of concern that the SA would be confined to assessing "strategic options for directions of growth" with a minimum figure of 500 dwellings. It appears to be basically linked to provision of a primary school. It seems there is opportunity for development to the northwest to enhance current planned key-sites and support the new primary schools planned in these locations without requiring the absolute 500 dwelling requirement. The Baker Associates Housing Requirement Assessment 2011 (para 8.32) suggests that the maximum theoretical capacity of delivery could be achieved by spreading development across up to 4 urban extensions. The SA (and additional options criteria) included sites A, B, C and D as part of a multi-site option. The SSDS proposed modifications do not sufficiently justify why only sites B and D have been selected or why site F and the Northern Escarpment are excluded.	<p>Noted and disagree. These are strategic directions of growth that need to be considered. The Council determined that each area should be able to deliver at least 500 dwellings with Para 3.22 of the Yeovil Strategic Growth Options SA Report (Oct 2013) stating that, "Based on other major developments in South Somerset since 2006, developments of less than 500 dwellings have not been required to make provision for a primary school or on-site formal playing fields and other community facilities". The reasons for why Area F and the northern escarpment are not reasonable alternatives are presented in Paras 3.20 and 3.26 of the SA Report. The reasons for the selection and/or rejection of reasonable alternatives are presented in Table 4.1.</p> <p>The Housing Assessment Requirement published prepared by Bakers Associates in 2011 has now been superseded.</p>	None.
28.17	Para 3.23	Para 3.23 - fails to identify agricultural land quality as a major constraint which impacts on level of growth.	The evidence ¹⁴ shows that each of the reasonable options contains best and most versatile agricultural land.	None.
28.18	Para 3.24	Removal of search area F (NW of Luffton) paras 3.24 - 3.26	Noted and disagree. The reasons why Area F was not considered a reasonable alternative are provided in Para 3.26.	None.

¹⁴ South Somerset District Council Local Plan Evidence Base. Core Document 135: Agricultural Land Classification Maps - Yeovil. Available online: <https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/evidence-base/yeovil-specific-documents/>

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		<p>The removal of this option within a re-appraisal is considered inappropriate particularly when a re-appraisal could have considered the potential requirement for greater than two multi-site approaches. The indication in landscape terms for removal of Lutton from further consideration is not agreed (see further detail set out in Appendix 2 of the ECPC submission). The capacity of 40 Ha is about the figure to deliver a strategic site within the potential impacts of heritage and visual aspects. The site benefits from proximity to two of the key-sites as well as the Lutton employment and retail area. The location is well suited for cycling and walking, has the potential for long term relationship with the urban edge at Lutton and Brimsmore and has potential to enhance facilities of the current development areas. Sensitive visual receptors are sufficiently distant to allow mitigation.</p> <p>The Western Corridor highways improvements would provide the opportunity for linkage to the Westland/Lysander employment area and the Bunford business park when it comes on stream. The loss of agricultural land is not a significant as elsewhere (i.e. option B) as it is lower grade and therefore this option should be considered in preference in accordance with the NPPF issue and overall this option may have performed well as a multi-site option, if an SA was applied.</p> <p>At paragraph 3.26 the attempt to remove any potential for development to the North West of the town is not agreed and unjustified.</p>		
28.19	General	The consultant noted the SSDC objective was to deliver	There was no limitation placed on a two	None.

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		a single site strategic location of 1,565 within the plan period. If a single location is not deliverable it is unclear why limitation to a two site option is justified, given the opportunity for flexibility in delivery and minimising impact. More than two multi-site options have been recognised as providing flexibility in meeting the housing requirement but not brought out effectively within this report.	site option by the Council. The reasons why Areas B and D were selected and why Areas A and C were rejected are provided in Table 4.1.	
28.20	Para 3.30	3.30- It is not agreed that there is potential for enhanced positive effects if pedestrian links can be made to the adjacent country park and from the country park into the town centre. The only logical linkage would have to be via the Aldon Estate which is a highly regarded equestrian/eventing location. Such a pedestrian link would be challenging to negotiate and would potentially route through areas of sensitive bio diversity as detailed in the Eco Town Biodiversity Baseline and Seeping Report July 2010.	Noted. In response to the Proposed Submission Local Plan consultation in 2012, Aldon Estate proposed the inclusion of land within the urban extension to help assimilate development within the town and provide scope for additional physical links to it ¹⁵ .	None.
28.21	Para 3.31	3.31- With regard to the key negative effects on historic environment it is unclear why it would be considered appropriate to include 5.8 ha of grade 1 agricultural land (designated as the Scheduled Monument (SM) setting in the Historic Environment Assessment) within the direction of growth in order to place interpretation and encouraging community involvement. Considering both historic environment and loss of high quality agricultural land are KEY negative effects and within context of "AVIODANCE" and "REDUCTION" the setting of the SM should be excluded from any proposed direction of	English Heritage noted in their response to the Proposed Submission Local Plan ¹⁶ that there are opportunities to enhance the immediate setting of the monument and achieve some gains through placing interpretation and encouraging community involvement in the management of the Scheduled Monument. The appraisal identified for Area B against SA Objective 10 that key mitigation will include an appropriate buffer between any proposed	None.

¹⁵ Proposed Submission Local Plan 2006-2028 Consultation - Comment ID 1732: Trustees of W H Batten (09 August 2012).

¹⁶ Letter (06 Dec 2012) English Heritage (Caroline Power) to South Somerset District Council (Mr Foyne) - South Somerset Proposed Submission Plan: English

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		growth.	development and the Roman Villa, including adjacent heritage assets (Chessels Roman Villa and the North Coker Conservation Area).	
28.22	Para 3.32	3.32- It is agreed that Coker is the only option that will lead to significant loss of grade 1 agricultural land BUT it has a permanent significant negative effect rather than SA consideration for a potential negative effect. SSDC proposed modifications argue that the loss of agricultural land can be mitigated through master planning. It is this aspect that cannot be mitigated as raised as a concern by the Inspector, there are other options with lower grade land which should be considered in preference (in accordance with NPPF).	The detailed appraisal of Area B against SA Objective 12 (Pg. 15, Appendix II) states, Development within this option area would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long term negative effect on this SA Objective. Compared to the other options, this option has the potential for the greatest loss of the highest grade of agricultural land".	None.
28.23	Paras 3.36 - 3.37	Area D Upper Mudford Paragraphs 3.36 - 3.37 The SA indicates a key negative effect is the loss of agricultural land. This option does not have the potential to lead to significant loss of grade 1 or 2. Considering that the NPPF para 112 emphasises agricultural land of lower quality should be utilised before higher quality it is absolutely clear this option performs significantly better than both options B and C. Improvements to the northern east/west highway routes identified in the Somerset County Council Future Transport Plan should go some way to improve connectivity, traffic flow and limit the rise of carbon emissions. The SA scoring applied to this option does not reflect these potential benefits compared to other options.	The detailed appraisal of Area D against SA Objective 12 (Pg. 46, Appendix II) states, "This option predominantly contains Grade 3a and 3b agricultural land, which is identified as 'good to moderate 'in the Agricultural Land Classification of England and Wales. The Option area also contains small proportions of Grade 1 and 2 agricultural land. Development within this option area would predominantly lead to the loss of both Grade 3a and 3b, which has the potential for permanent minor longterm negative effect on this SA Objective. This option is considered to have a reduced negative effect compared to the other Options as it does not have the potential to lead to a significant loss of Grade 1 and 2".	None.

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			It is considered that development in Area D would still have the potential for residual negative effects on traffic. When referring to the Transport Vision for Yeovil the Inspector states in his Preliminary Findings that, "there is no reason to conclude that whatever the location of the urban extension it would not benefit significantly from the identified seed projects".	
28.24	Paras 3.36 - 3.41	<p>Multi-site Option (consisting of any combination of Areas A, B, C, D) paras 3.36 - 3.41</p> <p>Area A, Brympton, although not meeting the SSDC criteria for a full strategic location, has excellent potential to deliver new and improved public transport infrastructure/pedestrian links due to proximity to the future Bunford Business Park, close to a potential sport zone location and accessible to the planned Western Corridor highways upgrade. Access from this location to employment, retail and schools has a great deal of potential particularly through non car modes.</p> <p>Development to the north/north east/north west of Yeovil could benefit from the current key-site developments which are expected to deliver significant gains including modal shift and can add value.</p> <p>The Parish Council supports a view that more than two multi-sites can provide improvements in modal shift terms across the town and the Strategic Urban Extension (SUE) development should not be limited to just two sites as</p>	Noted. The reasons for why Area A was rejected are presented in Section 4, Table 4.1 of the SA Report. The SA states in Paras 3.39 and 3.42 that the effect of the Multi-site option on certain SA Objectives is dependent on the distribution of development.	None.

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		<p>the overall benefit far outweighs the desire in policy terms to only establish one or two strategic sites.</p> <p>It is agreed there are potential negative effects in traffic terms across all options. Future improvements to the highways in close proximity in the Upper Mudford Option detailed in the Somerset County Council Future Transport Plan (Mudford Road, Combe Street Lane through to Thorne Lane and the Western Corridor) and the UWE Low Carbon Vision for Yeovil adds weight to mitigating impact to the north of Yeovil.</p> <p>The key negative effects for the multi-site is highlighted as 'historic environment and agricultural land', however this is not understood or evidence presented to support the comment. It is clear from the Defra ALC mapping of the Yeovil periphery and the SSDC HEA report of July 2010 the overall greatest impacts in the multi site combination, is to the south of Yeovil. It is within this element of the SA that comment is made that distribution of development should reflect the significance of agricultural land classification. East Coker Parish Council considers the grade of agricultural land has a direct linkage to the landscape sensitivity and in line with GLVA and NPPF development on the highest quality agricultural land should therefore be avoided following the principle that if it cannot be mitigated It should be avoided.</p>		
28.25	Table 3.3	<p>Comments on the Summary of Comparative Appraisal</p> <p>Table 3.3 provides the summary, this requires to be amended based on the analysis of Options B (Coker) and 0 (Upper Mudford) presented at Appendix 2 of the</p>	Noted and disagree. Please refer to the responses to Appendix 2 below.	None.

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		Parish Council submission.		
28.26	Table 4.1, Area B	<p>Comments on new Chapter 4 (Strategic Options Assessment In Plan Making)</p> <p>The summary of findings within Chapter 4 (Table 4.1) gives a clear picture of the SA conclusions.</p> <p>Area B (Coker) - While there is recognition that a single urban extension to the south of Yeovil (Area B Coker) is not justified on historic/heritage and land quality terms the commentary and scoring does not fully reflect the impacts and potential damage to these assets.</p>	Noted and disagree. Please refer to the other responses.	None.
28.27	Table 4.1, Area D	<p>Area D (Upper Mudford) - The reason for rejecting this option appears to be less strong in comparison to Areas A and C. Comment relates to "would not be easily mitigated" indicates mitigation is available but less easy. Insufficient consideration has been applied to the strong potential to utilise land (2010 and 2013 SHLAA) to the west of the A359. The Landscape Architect indicates this option has capacity for circa 1400 dwellings and the appraisal indicates significantly less impact than the Area B (Coker) which has agricultural land quality, historic, cultural and biodiversity impacts. The scoring and discussions for Option D (Upper Mudford) does not properly reflect the potential for development.</p>	Noted and disagree. While this is a matter for plan-making Table 4.1 clearly states that, "there is not enough available and deliverable land identified through the SHLAA to accommodate the objectively assessed need of 1,565 dwellings". The A359 was identified by the Council's Landscape Architect as a natural landscape boundary to option area D. '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.	None.
28.28	General	The Parish Council recognise that there is no single location that could absorb the level of Greenfield Urban Extension development (1,565 dwellings) proposed in the Local Plan and it agrees with the findings regarding this	Opinion noted. Please refer to the other responses.	None.

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		point. It does not agree that the North and Northwest areas should have been excluded on landscape and visual grounds nor that no urban growth should take place to the Northwest of Yeovil, the reasoning is dealt with in detail in other parts of this submission. The Parish Council consider that the North of Yeovil constraints are not as significant as reflected in the Landscape Study/Addendum and should have been considered within the SA, as should the Northwest.		
28.29	Appendix II	<p>Appendix 5. Comments on and Appendix ii Yeovil Growth Sustainability Appraisal.</p> <p>Comments on the Yeovil Growth Options Sustainability Appraisal Report October 2013 Appendix ii including comments on how it addresses the Inspector's concerns</p> <p>Overall the thrust of this Sustainability Appraisal appears more robust than previous appraisals. It would be important for the appraisal to satisfy the Inspector's concerns as it is these that the Inspector considered made the plan unsound. It is hoped that the East Coker Parish Council comments in this and other documents provides evidence in order for a Main Modification to be submitted that the Inspector considers sound.</p>	Noted.	None.
28.30	Appendix II, Areas B & D, SA Obj 1	<p>Objective 1- Improve access to essential services and facilities</p> <p>The Inspector's concerns regarding access to essential services and facilities from the Coker option remains. Access to the Hospital and College requires cross town commuting and is impacted by topography. The leisure</p>	Opinion noted. The SA provides a balanced, comparative and proportionate appraisal, which recognises the uncertainties with regard to the delivery of services/facilities and barriers to movement for each option area.	None.

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		<p>centre at Goldenstone is relevant but only until the future sports zone development comes on stream. Although reference is made to proximity to the town centre the topography is a significant negative that realistically is difficult to mitigate. An "exceptionally self-contained" urban extension (UE) is no longer envisaged while a greater requirement to use the Town Centre is recognised by SSDC. Walking and cycling to the town centre is significantly constrained and unlikely to be realised from the Coker Option. There is good linkage from the Upper Mudford option to both the hospital and college and similarly proximity to secondary education and sports facilities. There is potential for improved cycling and walking via northern residential area improvements detailed in objective 8.</p>		
28.31	Appendix II, Areas B, C & D, SA Obj 2	<p>Objective 2 - Reduce poverty and social exclusion</p> <p>It's unclear how the Coker option benefits the deprived Yeovil Central Ward as it is not contiguous or in relevant proximity. There are already good pedestrian links between the Town Centre and Yeovil Country Park so how this option benefits this objective is not understood. The Country Park abuts the Town Centre and is in proximity to Central Ward. The deprived ward also has proximity to recreational, retail and leisure facilities within the existing Urban Framework. The Upper Mudford option also is not contiguous with a deprived ward; however the Yeovil East Ward is close to the Lyde key site development, so there may be potential to provide improved facilities which could benefit the Yeovil East Ward.</p>	Opinion noted. There is potential for development in Area B to have minor indirect positive effects through the provision of housing, employment, primary school and other community facilities.	None.
28.32	Appendix II,	Objective 4- Improved health and wellbeing	Opinion noted. There are barriers to	None.

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	Areas B & D, SA Obj 4	There are recognised topographical constraints for the Coker option and as mentioned in objective 1 access to the hospital across town remains a relevant detractor. There is no evidence to indicate that Town Centre access to/from the Country Park is an issue which requires extensive improvement, only brought about by a southern urban extension. The aspiration is not a realistic or cost effective solution that would provide the change in modal shift to justify improved walking, cycling and disabled access through the country park from the south. The location of a sports zone south of Yeovil is dubious in terms of district or town wide benefit. The Inspector's comments regarding opportunity for the provision of open space in any area of search has not been discussed in the SA for the Upper Mudford option. Future plans show improvements to cycling and walking routes predominately to the north of Yeovil should have the potential to improve health and well-being. The details of these plans are commented on under objective 8. None of these initiatives are brought out in the SA discussion and should have been.	movement for each of the option areas as set out in Appendix II. As stated in the Inspector's Preliminary Findings, "there is no reason to conclude that appropriate open space could not be provided as part of a Masterplan for any of the areas of search". Proposed Submission Local Plan (July 2012) Policy HW1 requires provisions/contributions from new development if it generates a need for additional open space. Transport studies for growth around Yeovil identified option area B, to the south of Yeovil, as having the best potential to provide realistic opportunities for non car based travel (Pg. 8, Appendix II).	
28.33	Appendix II, Areas B & D, SA Obj 5	Objective 5 - Improves education and skills of the population The SA doesn't address the Inspector's comment regarding evidence to increase capacity in existing secondary schools which may support the concept of multi-site development. The SA recognises the closer proximity of the College and Secondary School to the	Noted and disagree. The evidence indicates that the scale of proposed development is unlikely to result in the provision of any significant new education facilities, such as a secondary school; however, there is the potential for all the options to provide a new primary school and extend/ upgrade existing facilities ¹⁷ .	None.

¹⁷ Para 2.13 of the Proposed Main Modifications Consultation Document (November 2013) and Somerset County Council PMM Representation (Comment ID 555).

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		Upper Mudford option and there is already a Primary School planned for in the Lyde key-site but these are not fully reflected in the matrix.	The distance of the options from secondary schools was considered; however, the SA concluded that there is uncertainty as the scale and scope of education facilities to be provided as part of development are not known. The SA concluded that there was little to differentiate between the option areas.	
28.34	Appendix II, Area D, SA Obj 7	Objective 7 - Support a strong, diverse and vibrant economy As the proposed Main Modification now reflects less "exceptional self-containment" there is an argument that proximity to employment areas of Lufton/Lyde and the relationship with RNAS/MoD Yeovilton (a large employer of Yeovil people) would be beneficial. The Somerset County Council Future Transport Plan ¹ (SCC FTP) specifies a future cycle link from the northern part of Yeovil to Ilchester but this has not formed part of the SA discussion.	Noted. The distance from existing employment areas as well as the potential provision of employment was considered for all option areas through the SA. A future cycle link from the north of Yeovil to Ilchester approx 5km away is not considered likely to have a significant positive effect against SA Objective 7.	None.
28.35	Appendix II, SA Obj 8	Objective 8 - Reduce the effects of traffic on the environment The Inspector comments on the opportunity of the Transport Vision for Yeovil indicating improvements to cycling and walking routes. This, in concert with the Somerset County Council Future Transport Plan and Yeovil's 21st Century Sustainable Transport provide a	Noted. Transport assessments ^{18,19,20} concluded that there is little difference in terms of traffic impact between potential sites and that background traffic growth is the major contributor to the deterioration of highway network performance. The Council has undertaken a traffic modelling study to consider the impacts of the	None.

¹⁸ Somerset County Council (Feb 2011) Non-Technical Forecasting Report (Final v2a) - Review of Yeovil Eco-Urban Extension.

¹⁹ Somerset County Council (June 2011) Non-Technical Forecasting Addendum Report (Final) - Review of Yeovil Eco-Urban Extension.

²⁰ Somerset County Council (Jan 2012) Non-Technical Forecasting Addendum Report (Final) - Review of Yeovil Eco-Urban Extension.

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		<p>clear view of a holistic approach and indicates the need for improved cycling/pedestrian links to the north,west and east of Yeovil. Highways improvements to the north Yeovil East/West route are in the transport plan as well as improvements for Lyde Road/A30 set out in the Eastern and Western Corridor Studies. The A37 south/A30 west routes have choke points which remain a substantial issue for the community to the south of Yeovil. Walking and cycling from the Coker option remains a significant detractor. A3088 Watercombe lane is not a realistic option as the SSDC/SCC LTP and YTSR indicates this is not an easy or feasible route, except for the hardest.</p>	<p>Proposed Main Modifications. The findings of this work support the previous transport assessments in that the differences between the different development options and travel demand scenarios are subtle and limited with no obvious preferred option. Background traffic growth to 2026 is the major contributor to deterioration of highway network performance, rather than the specific impacts of development sites²¹.</p> <p>The Inspector refers to the Transport Vision for Yeovil and then states, "There is no reason to conclude that wherever the location of the urban extension it would not benefit significantly from the identified seed projects".</p>	
28.36	Appendix II, Area B, SA Obj 9	<p>Objective 9 - Protect and enhance the landscape and townscape</p> <p>The work done in the Landscape Addendum has not satisfactorily addressed the Inspector's main thrust. A lower level of development should provide an opportunity for areas previously discounted to be re-considered within a broad re-appraisal. There continues to be little emphasis on identifying opportunity (paragraph 30 of the Inspector's his findings). It appears an exercise to re-justify the established position in relation to no development to the north and northwest as there is no indication on the potential of</p>	<p>Opinion noted. The method used in the Yeovil Peripheral Landscape Study Addendum was subject to review by an independent Chartered Landscape Architect. The findings and recommendations of the review were taken into account and informed the final Yeovil Peripheral Landscape Study Addendum (Aug 2013).</p> <p>Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil as</p>	None.

²¹ Yeovil Sustainable Urban Extension - Traffic Modelling (February 2014)

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		<p>assimilating these locations. The Inspector made specific comment on the weight he gave to sensitivity in the south but this appears to not to have been considered. He recognises the challenges to assimilate development and broadly suggests seeking mitigation measures at "a number of locations" around Yeovil. East Coker Parish Council considers that there are opportunities for development within a greater range of multi-site options than proposed in this Main Modification. The Parish Council considers that even with the maximum mitigation the proposed scale of development would have long term MAJOR negative effect on the Coker option. It is not agreed that sufficient or appropriate mitigation strategies can be put into place to limit significant major long term negative impact. Mitigation for a range of lower scale multi-site options is more achievable. A change is required regarding the SA objective for Coker regarding the number of dwellings in 80ha given 40% green space and other landscaping/infrastructure requirements would mean a lower number of dwellings than quoted in the SA. There is development opportunity west of the A359 Mudford Road, with potentially less adverse effects and with the potential to assimilate into the setting of the town, but excluded prematurely and not fully explored or discussed.</p>	<p>well as the reasons for why some areas were rejected as not being reasonable.). The A359 was identified by the Council's Landscape Architect as a natural landscape boundary to option area D. '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.</p>	
28.37	Appendix II, Area B, SA Obj 10	<p>Objective 10- Conserve and where appropriate enhance the historic environment</p> <p>It is not clear how the Inspector's comments have been addressed or an explanation given regarding what weighting the Council applies to impacts on heritage assets compared to other impacts, for example</p>	<p>Noted and disagree. The SA was informed by the Historic Environment Assessment of Yeovil Periphery (July 2010) as well as the Yeovil Peripheral Landscape Study Addendum (Aug 2013), the latter of which considers designated heritage. The appraisal of Option B also took into</p>	None.

Rep ID	Doc Ref	Consultee Comment Summary	Response	Changes
		<p>landscape and visual amenity. The Inspector sought clarification concerning the inconsistency within the SA and how it related to the HEA. This has not been addressed. SSDC indicated in their August 2010 SA that the HEA ruled out the northwest, but this was only in relation to sufficient land of 220ha for a 5,000 dwelling requirement.</p> <p>The SA supporting the Main Modification has error and inconsistency. The information source (English Heritage Map Search) referenced in the SA work and cross referring to the HEA it appears the Upper Mudford area has a total of just three listed heritage assets in or on the edge of the search area including just a Grade II listed milestone on the A359 west of Primrose Lane. The Coker option B area has twelve listed buildings and one Scheduled Monument but the SA only refers to "a number of listed buildings" showing no consistency in approach. In historic terms the Coker area was assessed as having moderate capacity to accommodate new development but with significant medium to long term negative impact. The setting of the Dunnock's Lane Scheduled Monument is important and should remain outside any designated area of growth or direction of growth. The setting is clearly detailed in the figures 2.5 and 2.12c of the HEA of Yeovil Periphery (July 2010). In addition the setting of the Grade II listed Keyford House (figure 2.12c) is not referred to in the SA Objective and should be taken into consideration. Significantly the East Coker Conservation area is on the edge of the Coker option B area of search but no mention of impact has been made within the SA. This requires to be rectified and needs to be properly considered.</p>	<p>account previous responses from English Heritage related to proposed development at Area B. The SA found that development at Area B has the potential for a significant medium to long-term negative effect on SA Objective 10 (historic environment). It concludes that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects.</p> <p>The appraisal identified for Area B against SA Objective 10 that key mitigation will include an appropriate buffer between any proposed development and the Roman Villa, including adjacent heritage assets (Chessels Roman Villa and the North Coker Conservation Area).</p>	

Rep ID	Doc Ref	Consultee Comment Summary	Response	Changes
28.38	Appendix II, Area B, SA Obj 10	<p>Objective 12- Minimise pollution (including air,water,land,light,noise) and waste production</p> <p>The Inspector mentions agricultural land classification and national policy to utilise lower grade land in preference to loss of higher grade land. He recognises less weight appears to have been applied and East Coker Parish Council agrees with that view. The Inspector clarifies the importance of this issue. It is clear the SSDC plan requires significant development of agricultural land but there remains no explanation how the economic benefits of the highest quality land under NPPF 112 and other requirements relate to each other. The SSDC vision for retention of a viable agricultural base with high quality local food production, balanced against loss of high quality land, was raised by the Inspector. The issue of the permanent loss of high quality grade 1 land is recognised however there is no figure placed on the quantity of this land to be lost. For the single UE it would be approximately 118ha and almost the whole of the grade 1 agricultural land sits within the Civil Parish of East Coker. The Main Modification proposal has a grade 1 agricultural land take of approximately 34ha for approximately 800 dwellings. Although the SA recognises significant negative impact there is no recognition within the SSDC landscape studies or constraints mapping on the high level of importance placed on this resource within the NPPF. Nor does SSDC adequately explain why other reasonable alternatives are discounted or not brought into a multi-site solution considering SSDC recognise self-containment is no longer a realistic aspiration.</p>	<p>Noted. Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil as well as the reasons for why some areas were rejected as not being reasonable.</p>	None.

Rep ID	Doc Ref	Consultee Comment Summary	Response	Changes
28.39	Appendix II, Area B, SA Obj 14	<p>Objective 14- Conserve and enhance biodiversity and geodiversity</p> <p>The Inspector sought to understand the inconsistency with regard to how impacts on biodiversity and proposed mitigation were assessed. SSDC commissioned the Yeovil Eco Town Biodiversity Baseline and Scoping Report in July 2010 (CD103) which covered options 8, 10 and 11 (but not northern options), the document covering the Yeovil periphery was the Strategic Ecological Assessment of Potential Housing Sites (Nov 2009). The inconsistency has not been addressed within the SA. The Eco-Town Scoping Report shows further impacts than the Strategic Ecological Assessment including the addition of potential of Noctule Bats foraging areas and potential presence of Great Crested Newts and the presence of Sandy Stilt Puffball at Plackets Lane all within the Coker Option. These have potentially greater impacts than reflected in the re-appraisal.</p>	<p>Noted and disagree. The SA has taken a consistent approach to the appraisal of Options against SA Objective 14. The findings of the Eco-Town Biodiversity Baseline Scoping Report (July 2010) do not significantly affect the findings presented in the Yeovil Strategic Growth Options SA Report (Oct 2013). Further, more detailed project level assessments would confirm the presence of important species and habitats and set out measures to mitigate any significant impacts.</p>	None.
28.40	General	<p>Conclusion</p> <p>East Coker Parish Council concludes that the SA supporting the Main Modification is more robust than previous iterations. In terms of assessment the consultants indicate there is little to choose between options D and B but this is not agreed. It is not an accurate assessment as the scoring in two important objectives of Historic Environment and Minimising Pollution; n Option D scores reflect lower impacts than Option B. If the additional evidence (which is in the public domain) presented in this Appendix had been included an even greater difference would be evident.</p>	<p>Noted and disagree. Please refer to the responses to the points above.</p>	None.

Rep ID	Doc Ref	Consultee Comment Summary	Response	Changes
J M Lumley (SSDC Comment ID: 1048)				
29.1	General	I refer you to the "National Planning Policy Framework" re:- your modifications both being <u>unsound</u> :- Re Legal Compliance and Re Soundness of proposed main modification. Also – It was indeed "Unfortunate" that there was a printing error on some of the comments forms – ie Printing the "ODD" pages and missing out "EVEN pages". This error says it all! More waste of time and money by our planning office!	Noted.	None.
29.2	General	a) Despite the amended directions of growth for Yeovil sustainable urban extensions one cannot escape the fact that valuable Grade 1 agricultural land is still being proposed for use when "brown field" sites are yet available and many new build properties on estates in Yeovil remain unsold/unoccupied.	Noted. This is a matter for the plan-making process.	None.
29.3	Appendix II, Area B, SA Objs 10 & 14	b) There remains a lack of consistency regarding historic environment and a lack of clarity with regard to biodiversity and geodiversity in the Keyford/East Coker Area.	Noted and disagree. The SA has taken a balanced and consistent approach to the appraisal of reasonable options.	None.
29.4	Para 3.24	c) I note in Para 3.24 that Yeovil Marsh (Area E) has been discounted as the site is at the base of a steep slope making the potential for journeys by foot or bike significantly reduced Please note that Hendford Hill is steeper still and already "log-jammed" with traffic at least three times a day.	This is only one of the reasons for why the Council rejected Area E. The SA Report states in Para 3.24 that Area E, "was not progressed further as it is completely divorced from the established northern edge of the town and therefore would appear as a separate settlement rather than an urban extension. This would vastly reduce the potential for the creation of a sustainable development as it would not	None.

Rep ID	Doc Ref	Consultee Comment Summary	Response	Changes
			<p>benefit from the services and infrastructure of Yeovil. Furthermore, as this site is located at the bottom of a steep slope, the potential for journeys by foot or bicycle is significantly reduced". The appraisal of Area B in Appendix II recognises the topographical barriers to pedestrian movement.</p>	
29.5	Para 3.26	<p>d) I note that Para (3.26) states "west of Lufton option has been discounted in view of Montacute House, Historic Park and Gardens." There is a lack of consistency here in that East Coker boasts several Grade I and Grade II listed buildings and has historic uninterrupted rural views at present from Coker Court Parkland.</p>	<p>This is only one of the reasons for why the Council rejected Area F. The SA Report states in Para 3.26 that Area F, "was not progressed further due to the significant landscape sensitivities and potential effects on heritage assets. The potential development land lays at a relatively low elevation; it is separated from the town and is outside its topographic setting and would introduce urban expression into a large rural area, wholly at variance with the character of the wider landscape of the valley, and the sensitive receptors of Montacute House Historic Park & Gardens, St Michaels Tower and Ham Hill Scheduled Monument. The PLS Addendum stated that mitigation does not satisfactorily address the potential landscape and visual effects arising from the introduction of substantive and detached urban form within these distinct rural areas. It therefore recommends that these study areas are not considered for urban growth". The Yeovil Peripheral Landscape Study Addendum (August 2013) concluded that</p>	None.

Rep ID	Doc Ref	Consultee Comment Summary	Response	Changes
			there is suitable mitigation to address the identified long-term significant effects of development in Area B, resulting in minor long-term negative effects.	

Local Plan Proposed Main Modifications SA Report (Nov 2013)

Canal Way		
Issue		SSDC Response
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.	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). Recommendation: No change to PMM3 or Policy PMT3.
	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.	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. 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. Recommendation: No change to PMM3 or Policy PMT3.
	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.	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. Recommendation: No change to PMM3 or Policy PMT3.
	Object to residential development at Canal Way on the basis that the SA is unsound in the following places: Objective 1 – both options (Canal Way and Shudrick Valley) should score the same, Canal Way may be near	Response is given by objective: 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>the medical centre, but this is only one of a number of 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</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>
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<p>potential for a residual minor negative effect on traffic” is 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>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.</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</p>
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		<p>option could have a slight/moderate effect on assets. There are two Listed 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.</p> <p>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.</p> <p>Recommended Change to SA - Canal Way from 0 to - and changes to the commentary to explain. No change to PMM3 or Policy PMT3.</p> <p>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.</p> <p>Objective 12 - the SA takes into account potential impact on Coldharbour</p>
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		<p>Farm in that is states “the requirement to rationalise farm land holdings 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</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>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. 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</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>
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<p>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.</p> <p>Herne Hill gifted to Town Council for residents of Ilminster.</p>	<p>It is noted that Herne Hill was gifted to Town Council for the residents of 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>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 4 - proximity of Canal Way to the new medical 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>Objective 5 – the appraisal identifies no significant difference between the 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</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>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 - 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>
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