

## **South Somerset District Council Local Plan**

### **Sustainability Appraisal Addendum Report**

### **Non-Technical Summary**

**March 2014**

*enfusion*



## **Introduction**

1. This is the Non-Technical Summary of the Local Plan Proposed Main Modifications Sustainability Appraisal report (November 2013), the Strategic Growth Options for Yeovil SA report (October 2013), and the SA Addendum report (March 2014).
2. Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), has been carried out to inform preparation of the South Somerset Local Plan (known as the Core Strategy at early stages in the plan making process) since 2009. The progress of the Local Plan and SA, and the iterative relationship between the two are set out in figure 1.
3. The Local Plan Examination hearing sessions took place in May-June 2013. Following these sessions, the Inspector raised some issues in his Preliminary Findings<sup>1</sup> which resulted in the Examination being suspended whilst additional work was prepared to address his concerns. Independent consultants ‘Enfusion’ carried out the Strategic Growth Options for Yeovil SA, whilst Council Officers have prepared the SA of the proposed main modifications for the direction of growth at Ilminster<sup>2</sup> (Policy PMT3) and policies on delivering employment land (SS3), housing (SS5) and gypsies and travellers (HG7). Enfusion also prepared a ‘compliance review’ focusing on the previous SA relevant to Yeovil, which informed the SA reports and this Non-Technical Summary (NTS).<sup>3</sup>
4. Public consultation on the SA reports, which accompanied the Local Plan Proposed Main Modifications, took place from November 2013 – January 2014. Representations were received on the SA reports, indicating that further clarity was required to explain the purpose of, and relationship between, the Yeovil Strategic Growth Options and Local Plan Proposed Main Modifications SA Reports. It was also necessary to more clearly present and better distinguish between the SA work that has been carried out in relation to soundness issues 1 (Yeovil sustainable urban extension) and 2 (Ilminster direction of growth) and the proposed changes to the Local Plan.
5. It is important to maintain consistency and continuity with the previous SA work, so the appraisals were carried out using the same framework of sustainability objectives and decision-aiding questions. This NTS should be considered in conjunction with the SA report of June 2012 and its addendum (January 2013).

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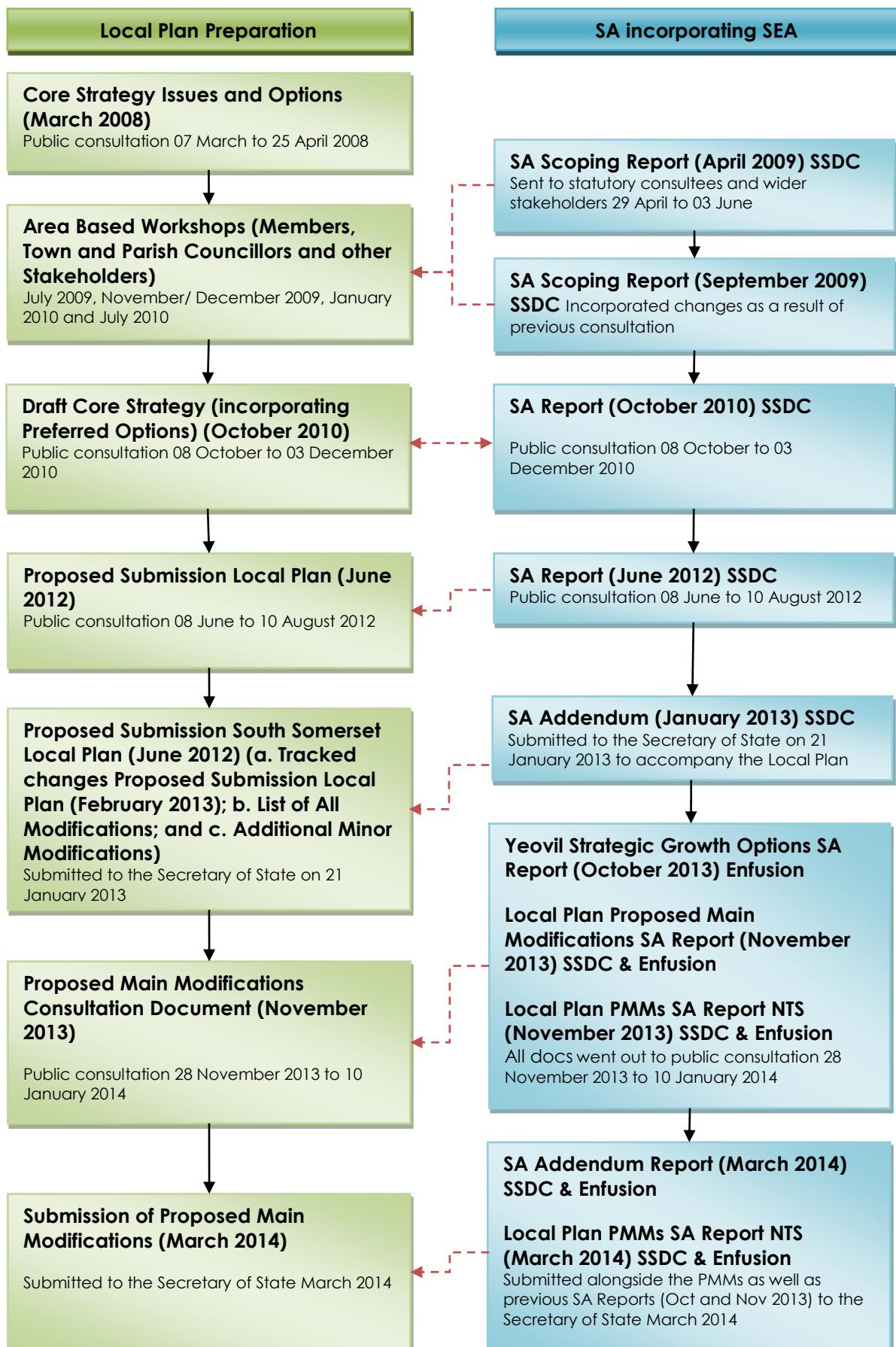
<sup>1</sup> Inspector’s Preliminary Findings Letter (3 July 2013)

[https://www.southsomerset.gov.uk/media/572193/inspector\\_s\\_preliminary\\_findings.pdf](https://www.southsomerset.gov.uk/media/572193/inspector_s_preliminary_findings.pdf)

<sup>2</sup> Ilminster SA was subject to quality assurance by Enfusion.

<sup>3</sup> This Non-Technical Summary was also subject to quality assurance by Enfusion.

Figure 1: Local Plan and Sustainability Appraisal progress and Interrelationships



## **Sustainability context and framework**

6. The baseline information and plans, policies and programmes (PPP) review was updated<sup>4</sup> in light of the compliance review and the Inspector's preliminary findings. The baseline update indicates that the population of South Somerset continues to grow by around 1,000 people per year, with a high proportion of this growth being from elderly persons. Unemployment is lower than regional and national averages, although the impact of the recession caused a rise between 2008 and 2010. Manufacturing is a key employer, contributing 10% more jobs in the district than the regional average. Relatively few people in South Somerset live in areas of deprivation, and health is generally good, although there has been a fall in community facilities and services in the rural areas. House prices fell sharply between 2008 and 2010 but have remained fairly stable between 2010 and late 2012. House prices are higher in South Somerset than the national and regional averages, although this is heightened by much higher prices being paid for detached properties.
7. South Somerset has a high quality natural environment with the internationally designated Somerset Levels and Moors protected for its biodiversity and parts of three Areas of Outstanding Natural Beauty particularly notable. There are also some fertile belts of high quality agricultural land. The historic environment is highly valued, with over 80 Conservation Areas, around 350 Grade I or II\* listed buildings, and 18 Historic Parks and Gardens. There are also some important archaeological sites, including over 70 Scheduled Monuments. The proportion of homes being built on previously developed land has fallen over the last couple of years, although this was to be expected as major greenfield housing sites in the district started to come forward. Air quality is improving and carbon dioxide emissions are reducing, but car ownership is relatively high, likely to be a reflection of the need to travel given the rural nature of South Somerset.
8. The key changes in the latest review of plans, policies and programmes include the publication of the final National Planning Policy Framework (NPPF) and related Planning Policy for Traveller sites (although the draft NPPF was reflected in the previous PPP review) which introduced the presumption in favour of sustainable development.
9. In addition to the NPPF, there were several other key changes in the latest PPP review – these include the Regional Spatial Strategy and Structure Plan policies being finally revoked; an updated District Council Plan with a focus on jobs, homes, the environment and health and communities; and an addendum that was prepared to the Yeovil Peripheral Landscape study in response to issues in the Inspector's preliminary findings.
10. Overall, although a review of baseline information has provided some useful updates, the key trends previously highlighted generally still apply. It is considered that the key sustainability issues identified in the SA report of June 2012 (section 4.4) are still valid. The updated baseline and PPP review reflects the iterative and ongoing process of SA to inform plan-making.

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<sup>4</sup> The Baseline information and PPP review update was undertaken in September 2013.

11. Further explanation on the sustainability issues and the relationship between the SA objectives and the National Planning Policy Framework is given in section 2 of the Strategic Growth Options for Yeovil SA report (Oct 2013). For convenience, the SA framework of objectives and decision-aiding questions, and their relationship to the SEA Directive and NPPF are set out in figure 2 below.

Figure 2: The SA framework and its relationship with the SEA Directive and the NPPF

<b>SA objective</b>	<b>Appraisal questions: will the policy / proposal / strategy help to...?</b>	<b>SEA Directive topic</b>	<b>Relevant NPPF paragraph</b>
1. Improve access to essential services and facilities	...ensure high levels of accessibility to shops, schools, health/leisure facilities and other key services by walking, cycling, and public transport? ...reduce social exclusion?	Population	17, 28 – 30, 37, 38, 69, 70
2. Reduce poverty and social exclusion	...benefit particularly deprived areas? ...encourage active involvement of local people in community activities? ...maximise opportunities for all members of society? ...maximise opportunities within the most deprived areas? ...reduce fuel poverty?	Population	17, 28, 69, 70
3. Provide sufficient housing to meet identified needs of the community	...increase the range, quality and affordability of housing for all social groups? ...reduce homelessness?	Material assets, population	17, 47 – 52, 54, 55
4. Improve health and well being	...improve access to high quality health facilities? ...reduce health inequalities? ...encourage healthy lifestyles through, for example, open space and green infrastructure provision?	Population	17, 69, 70, 73 – 78
5. Improve education and skills of the population	...improve qualifications and skills of young people and adults? ...promote life-long learning that is accessible to all? ...provide an increased supply of skilled workers to the economy?	Population	17 – 21, 72
6. Reduce crime and fear of crime	...reduce anti-social behaviour? ...reduce actual levels of crime? ...reduce the fear of crime?	Population	58
7. Support a strong, diverse and vibrant local economy	...foster balanced economic growth? ...provide jobs for all with a diverse range of employment opportunities? ...ensure accessibility to work by walking, cycling and public transport? ...promote town and local centre vitality and viability? ...improve business development and enhance competitiveness? ...assist businesses in finding appropriate land and premises? ...promote sustainable tourism opportunities?	Population	17 – 28
8. Reduce the effect	...reduce the need to travel? ...increase	Human	17, 29 – 38,

of traffic on the environment	proportion of journeys made by non-car modes? ...reduce road traffic accidents? ...reduce the growth of congestion?	health, air, climatic factors	93, 95
9. Protect and enhance the landscape and townscape	...protect and enhance the landscape and townscape and its local distinctiveness? ...reduce the amount of derelict, degraded and underused land? ...promote visual amenity? ...protect and enhance natural landscapes within the urban area, including recreational open space and green corridors?	Landscape	17, 28, 56 – 66, 74 – 78, 109 – 111, 113 – 116
10. Conserve and where appropriate enhance the historic environment	...conserve and enhance the cultural heritage, archaeological sites and remains, listed buildings?	Cultural heritage	17, 126 – 141
11. Reduce contribution to climate change and vulnerability to its effects	...promote energy efficiency? ...encourage renewable energy? ...reduce carbon dioxide emissions? ...incorporate the principles of sustainable construction? ...make efficient use of water? ...consider the need to adapt to climate change?	Climatic factors,	17, 30, 34, 93 – 99
12. Minimise pollution (including air, water, land, light, noise) and waste production	...improve and maintain air and water quality? ...minimise noise and light pollution, odour and vibration? ...minimise pollution of land and soil (including minimising loss of best and most versatile agricultural land)? ...reduce waste production and increase reuse, recycling and recovery of waste?	Air, water, soil	17, 109, 110, 112, 120 – 125
13. Manage and reduce the risk of flooding	...minimise the risk of flooding to people and property? ...promote the use of Sustainable Drainage Systems (SUDS)?	Water	17, 94, 99 – 104
14. Conserve and enhance biodiversity and geodiversity	...protect and enhance wildlife habitats and sites of geological conservation interest? ...conserve and enhance species diversity, in particular avoiding harm to protected species? ...promote Green Infrastructure?	Biodiversity, flora, fauna	17, 109, 110, 113, 114, 117 – 119

## Local Plan objectives

12. The strategic objectives set out in the Local Plan have been subject to a compatibility analysis against the SA objectives to order to ensure they provide a sustainable basis for developing the policies (that follow on from the strategic objectives). This exercise ensures that any conflicts or tensions between the two sets of objectives (i.e. SA objectives and Local Plan strategic objectives) are highlighted early on which might, in turn, influence the nature of the Local Plan policies that are subsequently developed.
- The nine Local Plan strategic objectives are:

- i. Safe, resilient, socially just, inclusive and sustainable communities providing employment, homes and services in close proximity with strong networks and confident people sharing respect for each other.
  - ii. A health enhancing environment, promoting walking, cycling and non car based transport and access to leisure opportunities.
  - iii. Access to quality services and facilities designed around the needs of the community, enabling everyone to have fair and equitable access to what they need in their local area.
  - iv. An integrated sustainable transport system developed both within and between towns especially to and from Yeovil, whilst promoting enhanced delivery of services direct to rural areas through Information and Computer Technologies.
  - v. A comprehensive, high performing economy that is diverse, adaptable and provides jobs growth and inward investment through a thriving Yeovil, regenerated Chard and market towns and a diversified rural economy.
  - vi. A natural and built environment able to attract and retain visitors, a vibrant tourism industry and encourage inward investment of high quality sustainable businesses.
  - vii. A balanced housing market with a range of both general and affordable housing to meet the required growth and sited and built to support sustainable lifestyles with low carbon emissions, delivered through a sustainable district settlement strategy and hierarchy.
  - viii. Address climate change through both mitigation and adaptation and move towards a Carbon Neutral economy by the Government target date of 2030 by delivering high quality and energy efficient development with exemplar development at Yeovil to move towards more sustainable, lower carbon consumption living and to provide a boost to new low carbon technologies.
  - ix. Protection and enhancement of our natural environment, historic environment and biodiversity, retaining the distinctiveness of settlements and reflecting known environmental constraints, including flood risks in locating growth.
13. It is important to test the compatibility between the strategic objectives of the plan and the SA objectives, as set out in figure 3 below.

Figure 3: Compatibility of the Local Plan Strategic Objectives and the SA Objectives

		SA Objectives													
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
Local Plan Strategic Objectives	i	✓	✓	✓	✓	✓	✓	✓	●	●	●	✓	●	●	●
	ii	✓	✓	●	✓	●	●	✓	✓	●	●	✓	✓	●	✓
	iii	✓	✓	●	✓	✓	●	●	✓	●	●	●	●	●	●
	iv	✓	✓	●	●	✓	●	✓	✓	●	●	✓	✓	●	●
	v	●	✓	●	●	✓	●	✓	✗	✗	✗	✗	✗	●	✗
	vi	●	✓	✓	●	✓	●	✓	✗	✗	✗	✗	✗	●	✗
	vii	✓	✓	✓	✓	●	●	✓	✓	✗	✗	✓	●	●	●
	viii	●	●	●	✓	●	●	✓	✓	●	●	✓	✓	●	●
	ix	●	●	●	●	●	●	●	●	✓	✓	●	●	✓	✓

- ✓ Compatible
- ✗ Incompatible
- No significant link.

14. Figure 3 above shows broad compatibility between the Local Plan strategic objectives and the SA objectives, which is encouraging as it shows that a positive approach to sustainability is at the core of the plan. However there are some tensions, primarily between Local Plan strategic objectives 5 and 6 relating to economic development and housing supply, and the SA objectives that are focussed on transport and the environment (including climate change). There is a requirement for housing and economic growth to meet the needs of additional household creation, to ensure that the district continues to remain prosperous, and to foster the social benefits that arise from meeting these development needs. It is vitally important that the negative effects of development are mitigated in order to minimise the adverse effects of this growth and maximise the beneficial effects; for example through avoiding development in highly valued environmental areas, promotion of green infrastructure, and encouraging sustainable travel. Indeed, strategic objective 6 does explicitly support sustainable lifestyles with low carbon emissions, which should help overcome any potential incompatibility.

### **Soundness Issue 1: SA of Yeovil's Strategic Growth Options**

15. The strategic direction of growth for Yeovil presented in the emerging South Somerset Local Plan has evolved over recent years as a result of ensuring compliance with national policy and legislation, various technical studies, and consideration of comments made from consultation with the public, stakeholders and regulators. The needs within the urban extension to Yeovil have changed since 2008 from 5,000 dwellings, through to 2014 with 1,565 dwellings required in the lifetime of the plan. SA has played an important role in refining options for the location of the urban extension, but the Inspector's Preliminary Findings identified some concerns regarding the SA of the Sustainable Urban Extension for Yeovil – these are summarised below:

- 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;
- Lack of substantive evidence to demonstrate that there are significant differences in terms of landscape impact between several of the options;
- Lack of consistency regarding the historic environment; and
- Lack of clarity regarding to biodiversity and geodiversity.

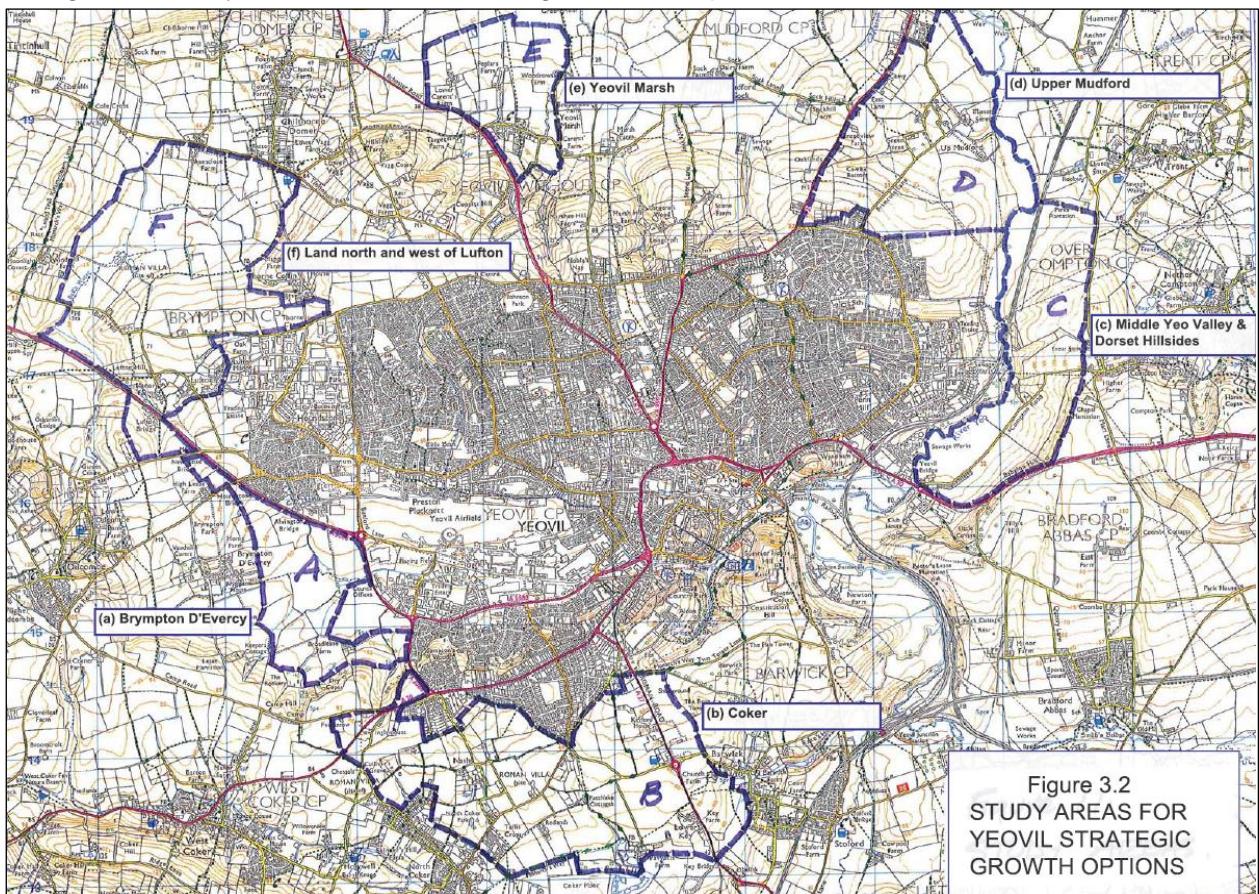
16. Independent consultants Enfusion were commissioned by the Council to carry out a fresh SA of the Yeovil Strategic Growth Options. Council Officers and Enfusion reconsidered the constraints and potential opportunities for development for areas all around the edge of Yeovil (i.e. a 360 degree search), as indicated by the SHLAA and other technical studies such as flood risk assessments to help confirm the strategic growth options that are realistic for a fresh SA. The objectively assessed need in the plan period of 1,565 dwellings was used as the basis in considering the strategic growth options. As landscape sensitivity and capacity is a key factor in differentiating between the options, and had been identified as a key concern by the Inspector, more detailed landscape studies were undertaken by the Council and informed the

refinement and choice of options to be subject to SA. As these are strategic options for growth (of 1,565 dwellings) rather than site allocations (to be detailed in the forthcoming Site Allocations Development Plan Document) and thus reflect major developments, it was considered that each area should be able to deliver at least 500 dwellings. This was considered to be the minimum size of development that could deliver the community benefits necessary to promote a more sustainable development.

17. The 6 areas of search strategic directions for growth that were identified are listed below, and shown on the following figure 4:

- A. Brympton D'Evercy
- B. Coker
- C. Middle Yeo Valley and Dorset Hillsides
- D. Upper Mudford
- E. Yeovil Marsh
- F. Land north and west of Luton.

Figure 4: Study areas for Yeovil Strategic Growth Options



#### Areas not taken forward

18. The area to the south east of the town (between areas B and C) was not considered appropriate to include as a 'reasonable alternative' for a strategic direction of growth primarily due to having a low landscape capacity. In addition, there are several other constraints in this area that limit the scope for development, namely: topography, high flood risk, historic environment (with two Historic Parks and Gardens), and biodiversity with the presence of Local Wildlife Sites.

19. Areas to the north of the town (between areas D, E, and F) were not considered appropriate for a strategic direction of growth because of having a low or moderate-low landscape capacity to accommodate built development.
20. In addition, Area E was not progressed further because it is detached from the northern edge of the town and because development would have an adverse landscape and visual impact upon Yeovil Marsh and the surrounding area that could not be addressed through mitigation measures. Area F was not progressed further due to significant landscape sensitivities that could not be mitigated and potential effects on heritage assets.

### **SA of Strategic Growth Options for Yeovil 2013**

21. Following the constraints analysis it was considered that there were 4 potential strategic directions for growth around Yeovil, as set out below:
  - Area B – Coker
  - Area C – Middle Yeo Valley and Dorset Hillsides
  - Area D – Upper Mudford
  - Multi-site option – consisting of any combination of Areas A, B, C, D.
22. Area A was not included as a single site option because the presence of Brympton D'Evercy Historic Park and Garden, landscape sensitivity, and the proposed Yeovil Airfield flight safety zone, mean there is not enough reasonably available land for a single urban extension of 1,565 dwellings. The 4 reasonable options were subject to appraisal against the full SA Framework of Objectives. The categories of significance that were used to indicate the sustainability effects for these options against each of the 14 sustainability objectives are set out below (figure 5), which is consistent with the previous SA work. This is followed by the summary comparative appraisal of the options (figure 6).

Figure 5: SA categories of significance for Yeovil Strategic Growth Options

Categories of Significance		
Symbol	Meaning	Sustainability Effect
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem

<b>?</b>	Uncertain	Uncertain or Unknown Effects
<b>0</b>	Neutral	Neutral effect
<b>+</b>	<b>-</b>	The SA Objectives 1, 4, 8, 11 & 12 consider more than one topic such that there could be different effects. For example, Objective 12 includes pollution (air, land, water, light, noise), waste and protection of soil quality. An option could have a negative effect through loss of agricultural land but also have a neutral effect on pollution through adequate protection mechanisms – thus resulting in two symbols being shown.

Figure 6: Summary Comparative Appraisal of Strategic Growth Options for Yeovil

Sustainability Objective	Strategic Options				Summary Comparative Appraisal
	Option B (Coker)	Option C (Middle Yeo Valley & Dorset Hillsides)	Option D (Upper Mudford)	Multi-site Option (Areas A, B, C & D)	
1. Services and facilities	?	?	?	?	Options B and C are closest to the Town Centre; however, when considering the barriers to pedestrian movement for each of the options as well as the potential provision of services/facilities, the differences in terms of distance becomes less significant. Uncertainty as the scale and scope of facilities and services to be provided are not known.
2. Poverty and social exclusion	+	+	+	+	All of the Options are considered to have a similar effect against this SA Objective. Development could benefit the deprived wards within the Town with the potential for indirect minor medium to long-term positive effects on this SA objective.
3. Housing	++	++	++	++	All of the Options have the potential to deliver the identified need of 1,565 dwellings. Option B and the Multi-site Option could potentially provide further long-term benefits after the life of the plan as more development could be accommodated over the identified need, as identified in the PLS Addendum.
4. Improve health and well being	+ ?	+ ?	+ ?	+ ?	There are no significant differences between the Options in terms of distance from existing health services, in particular Yeovil District Hospital. All of the Options have the potential for minor positive long-term effects on health through the provision of housing and employment. There is an element of uncertainty as each of the options has barriers to improving pedestrian movement, which includes steep topography for Options B, D and the Multi-site, and the River Yeo and railway for Option C and the Multi-site.
5. Education and skills	?	?	?	?	Option D is the closest to an existing secondary school, however this isn't considered to be significant. Options B and C are a similar distance from an existing secondary school while the Multi-option could potentially comprise a number of these areas. The scale of proposed development is unlikely to result in the provision of any significant new education facilities, such as a secondary school;

Sustainability Objective	Strategic Options				Summary Comparative Appraisal				
	Option B (Coker)	Option C (Middle Yeo Valley & Dorset Hillsides)	Option D (Upper Mudford)	Multi-site Option (Areas A, B, C & D)					
					however, there is the potential for all the options to provide a new primary school and extend/upgrade existing facilities. Uncertainty as the scale and scope of education facilities to be provided as part of development are not known.				
6. Crime	0	0	0	0	No significant differences between the options.				
7. Economy	+	+	+	+	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 this SA objective. All of the options have good access to existing employment areas, taking into account the potential barriers to movement for each of them.				
8. Traffic	-	+	-	?	-	+	-	?	All options have the potential to exacerbate current congestion issues within the existing road network. Transport assessments concluded that there is little difference in terms of traffic impact between potential sites. Multi-site option is more likely to have less significant localised impacts but also provides less scope for a coordinated approach to the delivery of development and infrastructure, with less potential for positive effects through improved public transport and walking and cycling routes. There is currently only one crossing point into the town across the River Yeo and railway from Option C along Sherborne Road (A30). It is possible that providing additional crossing points over the River Yeo and railway may not be feasible. The site also lies within another Local Planning Authority area, so would not be subject to the same planning policies and contributions as Options B and D. This could restrict the provision of new pedestrian links between the site and the town centre as well as existing employment. Providing new and/ or improvements to existing pedestrian links could potentially be costly and would need to be carefully planned and designed. With this in mind it is considered that there is some uncertainty with regard to the potential for Option D to deliver improvements to pedestrian links as identified for Options B and D.

Sustainability Objective	Strategic Options				Summary Comparative Appraisal				
	Option B (Coker)	Option C (Middle Yeo Valley & Dorset Hillsides)	Option D (Upper Mudford)	Multi-site Option (Areas A, B, C & D)					
9. Landscape and townscape	-	-	-	-	Once mitigation has been considered there are no significant differences between the options. It is considered that all the Options have the potential for a residual minor medium to long-term negative effect on this SA Objective. The cumulative effect of a number of smaller scale developments as part of a multi-site option is difficult to determine as each area is within a different landscape setting. With this in mind you could assess that the impact of a number of smaller sites would be less than a larger site within an individual landscape setting. However, in the years extending beyond this plan period, the potential development areas within Areas A to D identified by the Addendum, are likely to come forward for development, and if this happens in piecemeal stages rather than as a single masterplanned form, then the resultant growth may lack the cohesion and appropriate mitigation that a larger site can deliver.				
10. Historic environment	-	?	?	?	-	?	Given existing constraints and evidence it is considered that Option B and the Multi-site Option (particularly Areas B & D) have the potential for a minor long-term negative effect on designated heritage after considering mitigation. The effect of the multi-site option will be dependent on the combination of sites selected and scale of development. There is an element of uncertainty for all options until detailed proposals and project level assessments have been carried out.		
11. Climate change	-	+	-	+	-	+	It is considered that all of the options have the potential to increase levels of carbon emissions through increased traffic with the potential for a minor long-term negative effect on this SA objective. It is also considered that all of the Options have the potential for a minor positive effect by either providing some form of renewable or low carbon energy on-site, or if not feasible, mitigating remaining emissions off-site (Governments proposed 'Allowable Solutions').		
12. Minimise pollution	0	--	0	--	0	-	0	--	It is considered that there is suitable mitigation available through the Local Plan and at the project level to address potential negative effects on air, water, land, light and

Sustainability Objective	Strategic Options				Summary Comparative Appraisal		
	Option B (Coker)	Option C (Middle Yeo Valley & Dorset Hillsides)	Option D (Upper Mudford)	Multi-site Option (Areas A, B, C & D)			
							noise pollution in the medium to long-term. Potential for significant long-term negative effects identified for Options B, C and the multi-site through the significant loss of Grade 1 and 2 agricultural land, which is classed as 'excellent' and 'very good' respectively in the Agricultural Land Classification of England and Wales <sup>5</sup> . Option B contains predominantly Grade 1 whereas Option C contains a mix of Grade 1 and 2. There is an element of uncertainty for the multi-site option as the effect is dependent on the combination of sites selected, which could include the Areas A and B. Option D is predominantly Grade 3a and 3b, which is classed as 'Good' to 'Moderate', with small areas of Grade 1 and 2, so is likely to have less of a significant effect on this SA objective through the loss of agricultural land.
13. Flooding	0	-	0	-	?	No areas of significant flood risk within Options B and D. Significant flood risk areas in Option C as River Yeo runs along western boundary. There is an element of uncertainty for the multi-site option as the effect is dependent on the combination of sites selected, which could include the area in Option C.	
14. Biodiversity and geodiversity	?	?	?	?		Given existing constraints and mitigation available at the project level and provided by Local Plan policies it is considered that significant effects are unlikely for any of the Options. However, there is still an element of uncertainty until project level surveys and assessments have been completed.	

<sup>5</sup> Ministry of Agriculture, Fisheries and Food (Oct 1988) Agricultural Land Classification of England and Wales.

## **Reasons for the selection/rejection of alternatives for Yeovil Strategic Growth Options**

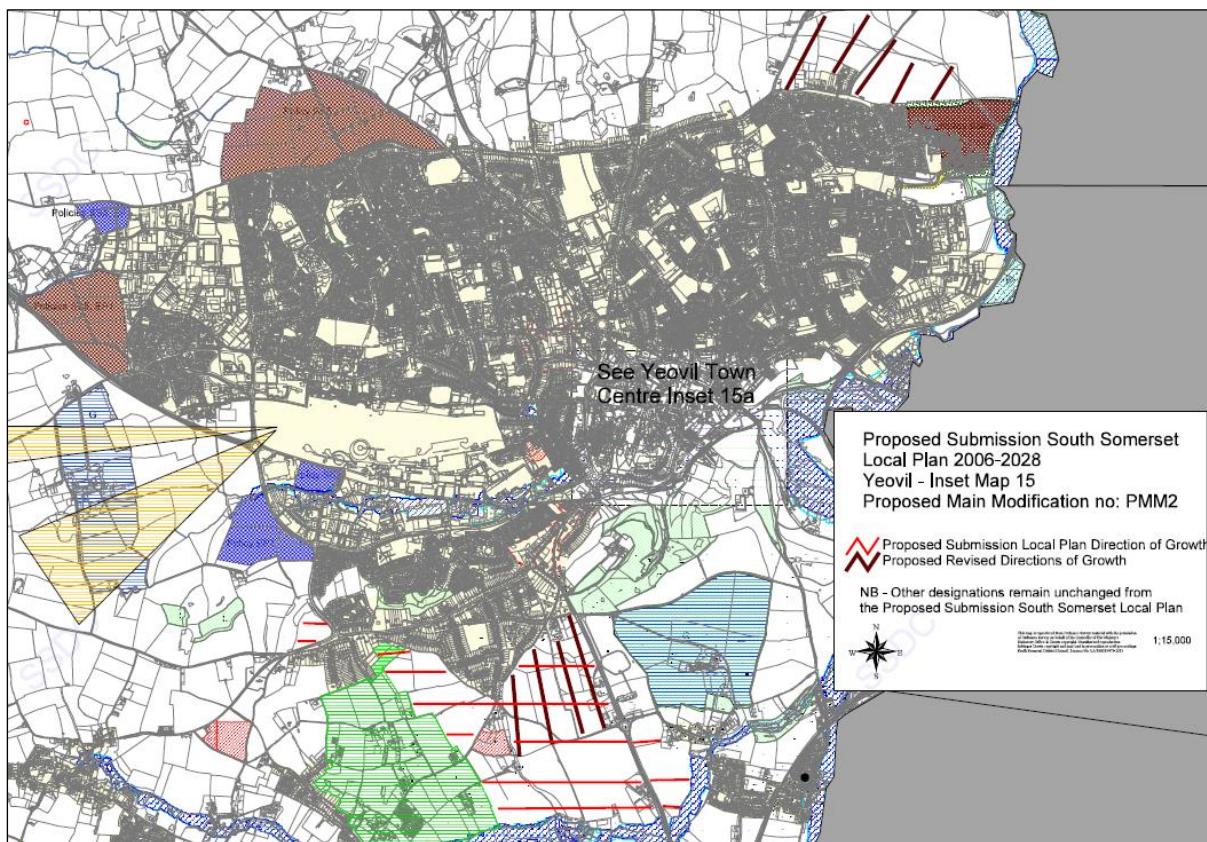
23. The findings of the revised SA have helped to inform the options assessment carried out by the Council. The SA found that there were some key differentiators between the options relating to the historic environment, flooding and loss of agricultural land; however the SA did not identify a clear preferred option. Therefore, further planning criteria were developed, to help inform the decision-making process. These criteria focussed on deliverability and viability, in line with the NPPF and separate to the SA process.
24. The updated evidence (including the Yeovil Peripheral Landscape Study Addendum and Report of the Landscape Architect for PMB), fresh SA of options, and further planning criteria all helped to inform the Council's decision to progress with two sustainable urban extensions, in areas B and D. Figure 6 below summarises the options considered for strategic growth around Yeovil, with an outline of the reasons for selection and rejection. The directions of growth in the Proposed Main Modifications to the Local Plan are shown on the map in figure 8.

**Figure 7: Reasons for the selection/rejection of Yeovil Strategic Growth Options in plan making**

<b>Options for Strategic Growth in Yeovil 2013</b>	<b>Reasons for rejection or selection in Plan Making</b>
Area B Coker	<p>This option was rejected because:</p> <ul style="list-style-type: none"> <li>- It would lead to the significant loss of Grade 1 agricultural land;</li> <li>- There is the potential for greater negative effects on heritage assets compared to other options;</li> <li>- A single-site option of 1565 dwellings would extend beyond established landscape boundaries, to thus require substantial mitigation to counter development impact.</li> </ul>
Area C Middle Yeo Valley & Dorset Hillsides	<p>This option was rejected because:</p> <ul style="list-style-type: none"> <li>- There is severance between the site and the rest of the town and mitigation is likely to be extremely costly and could affect the viability of development.</li> <li>- The deliverability of the site is in doubt because it is outside of the district and the relevant authority (West Dorset) have expressed strong concerns about its acceptability (landscape impact, coalescence, flood risk). In addition, West Dorset District Council have stated they would not support development in this area.</li> </ul>
Area D Upper Mudford	<p>This option was rejected because:</p> <ul style="list-style-type: none"> <li>- There is not enough available and deliverable land identified through the SHLAA to accommodate the objectively assessed need of 1,565 dwellings.</li> <li>- The impact of a larger site would not be easily mitigated, having limited landscape containment. The smaller option is better related to the existing town,</li> </ul>

Options for Strategic Growth in Yeovil 2013	Reasons for rejection or selection in Plan Making
	and the evolving Wyndham Park site, extending east from the A359 to cross Primrose Lane, to butt against the northwest edge of Wyndham Park. By laying within credible landscape boundaries, and having capacity for ready mitigation, the smaller site is the preferred landscape option in this quarter of the town.
Multi-site Option (consist of any combination of Areas A, B, C, D)	<p>Area A rejected because of the limited capacity of the site to deliver a strategic housing site. The site can accommodate up to 250 dwellings but this volume is not considered to be sufficiently significant to form part of the Direction of Growth.</p> <p>Area C rejected because of the reasons listed above.</p> <p>Areas B and D were selected because it is considered that a reduced scale of development over 2 sites will:</p> <ul style="list-style-type: none"> <li>- Improve deliverability/viability.</li> <li>- Reduce the site specific impacts upon infrastructure and allow the council to make use of Community Infrastructure Levy to provide facilities in the most appropriate location.</li> <li>- Reduce the loss of Grade 1 agricultural land on Area B.</li> <li>- Reduce the potential negative effects on heritage assets through development in Area B;</li> <li>- Reduce impacts on the landscape by containing built form within logical landscape boundaries;</li> <li>- Link well with the existing community and offer the potential for improvements to routes and services over a wider area;</li> <li>- Still deliver services and facilities to the benefit of the surrounding community.</li> </ul>

Figure 8: Proposed directions of growth for the Yeovil Sustainable Urban Extensions<sup>6</sup>



## Consultation

25. Some of the key issues raised in the consultation responses made on the Yeovil Strategic Growth Options SA report included:
- All reasonable options have not been considered, such as suitable areas to the north of Yeovil;
  - The further SA work does not address the Inspector's concerns;
  - Insufficient weight given to the loss of agricultural land, historic environment, landscape impact;
  - Multi-site option should not be limited to two sites;
  - Alternative 'scoring' submitted for a number of options;
  - The link between the SA and additional decision-making criteria is not clear;
  - The relationship between the two SA reports is not clear;
  - There has been no consideration of the potential effects of the preferred option for two urban extensions in areas B and D.
26. It was considered that the majority of representations do not require any further action through the SA process as the Strategic Growth Options for Yeovil SA Report does address the Inspector's concerns satisfactorily and provides a balanced, consistent approach to the appraisal of reasonable options for strategic growth in Yeovil. However, it was agreed that some further work was required to provide further clarity

<sup>6</sup> The proposed directions of growth are shown as vertical dark brown lines.

and address representations relating to the potential effects of the Proposed Main Modifications. An SA Addendum Report was produced by Enfusion to address these points and more clearly set out the screening of the Proposed Main Modifications. A summary of the screening findings is provided later in this NTS.

### **Soundness Issue 2: Direction of growth at Ilminster**

27. The Inspector's Preliminary Findings state that the proposed direction of growth at Shudrick Valley appears to be not sound when considered against the alternative at Canal Way. Therefore, the Council has revised the SA of options for the Ilminster direction of growth, with quality assurance provided by consultants 'Enfusion'.
28. Three options emerged (shown in Appendix 6B of the SA Report, June 2012 and on the following figure 10) from a constraints assessment of land around Ilminster in 2010, with particular emphasis on flood risk and landscape:
  - Option 1 (Shudrick Valley, south east)
  - Option 2 (Canal Way, south west)
  - Option 3 (North).
29. The revised SA considered these same three options, and was subject to public consultation in the Local Plan Proposed Main Modifications SA report from November 2013 – January 2014. As a result of consultation responses and updated evidence (including further historic environment evidence), amendments were made to the scoring for objectives 4 (at Canal Way), 8 (at Shudrick Valley) and 10 (at Shudrick Valley) – figure 8 compares the SA findings of the three options (incorporating amendments made following public consultation).

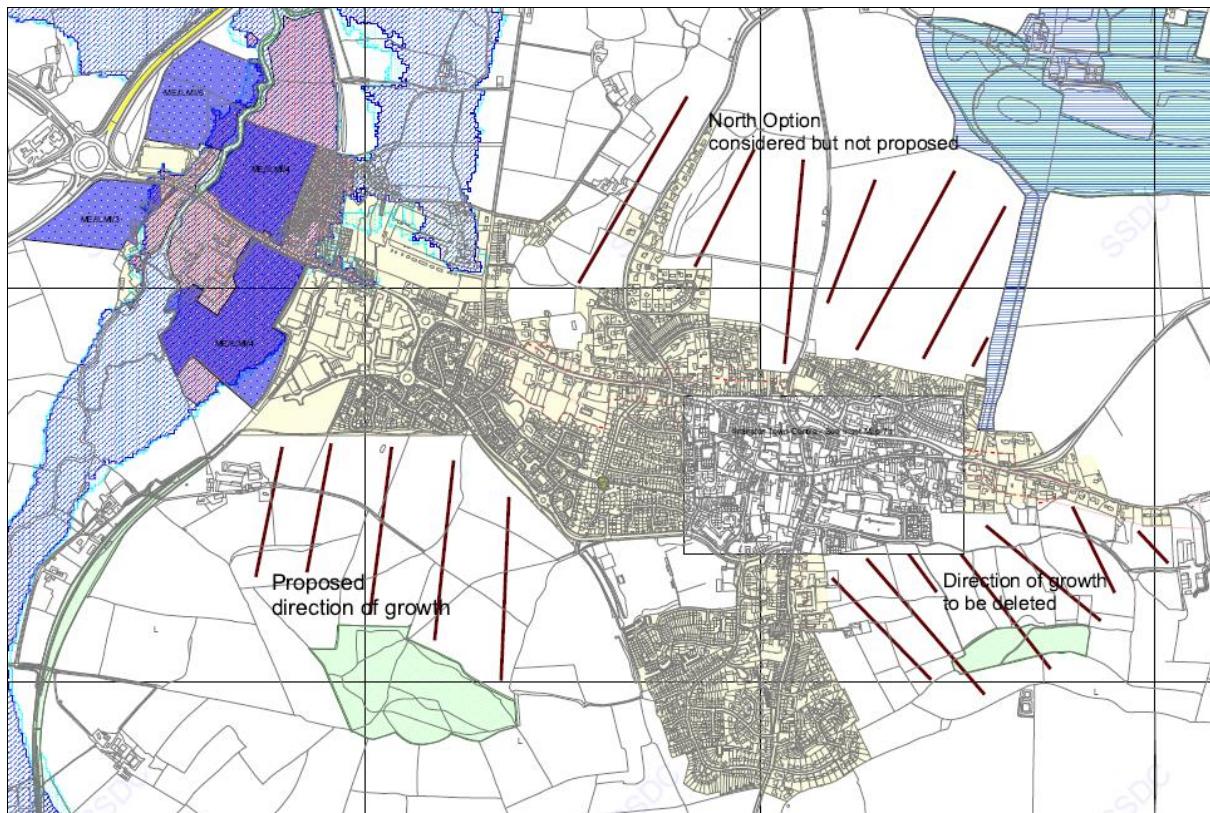
Figure 9: Summary comparative appraisal of Options for Ilminster direction of growth

Sustainability Objective	Strategic Options			Summary Comparative Appraisal
	Option 1 (Shudrick Valley)	Option 2 (Canal Way)	Option 3 (North)	
1. Services and facilities	++	+	+	Reason for the difference is that Shudrick Valley is the closest to the town centre and whilst the North option is close its beneficial effect is hampered by topography
2. Poverty and social exclusion	+	+	+	No significant difference.
3. Housing	++	++	--	Reason for the difference is that the North Option cannot accommodate the identified housing need.
4. Improve health and well being	+/-	+/-	+/-	Reason for the difference is that the Canal Way Option is adjacent to the new Medical Centre which is given special prominence tempered by distance from pharmacy and dentists.
5. Education and skills	+/-	+/-	+/-	No significant difference. It should be noted that the County Council have a preference for growth to the south west by

Sustainability Objective	Strategic Options			Summary Comparative Appraisal
	Option 1 (Shudrick Valley)	Option 2 (Canal Way)	Option 3 (North)	
				Canal Way given its centrality to the primary school catchment but its absence from the school building programme means that this matter must be viewed with some uncertainty.
6. Crime	?	?	?	No significant difference.
7. Economy	+ +/-	+/-	+ +/-	The negative effect identified for Canal Way is based on the proximity of the A303 and potential for out commuting.
8. Traffic	+/-	+/-	+/-	It should be noted that the Shudrick Valley Option has the potential for further benefits over the other Options as it could provide an alternative route through the town; however, at this stage this is uncertain.
9. Landscape and townscape	--	-	--	The Shudrick Valley and North Options have areas of higher landscape sensitivity; therefore there is the potential for a greater negative effect compared to the Canal Way Option.
10. Historic environment	--	-	-	Shudrick Valley has a bigger interface with the Conservation Area and impinges the Area of High Archaeological Potential.
11. Climate change	+/-	+/-	+ +/-	No significant difference other than the North Option provides greater opportunity for on-site renewable energy generation. There is the potential for the other options to meet the zero carbon standard by mitigating remaining emissions off-site as per the government's proposal for allowable solutions.
12. Minimise pollution	--	-	--	Development at the Shudrick Valley and North Options would lead to the loss of best and most versatile agricultural land.
13. Flooding	+	+	0	No significant difference once mitigation is taken into account although localised flooding issues are expected to be required to be addressed at Shudrick Valley and Canal Way.
14. Biodiversity and geodiversity	?	?	--	The North Option contains Lesser Horseshoe Bat maternity colonies and hibernation roosts, therefore the potential for a significant negative effect.

**Figure 10: Options for the direction of growth at Ilminster**

- Option 1 (Shudrick Valley) – ‘Direction of growth to be deleted’
- Option 2 (Canal Way) – ‘Proposed direction of growth’
- Option 3 (North) – ‘North Option considered but not proposed’



#### **Reasons for the selection/rejection of alternatives for Direction of growth at Ilminster**

30. The following table (figure 11) outlines the reasons for rejecting the options at Shudrick Valley and to the north, and for selecting a direction of growth at Canal Way, as set out in the proposed amendment to Policy PMT3.

**Figure 11: Reasons for the selection/rejection of the direction of growth at Ilminster in plan making**

<b>Options for Direction of growth at Ilminster</b>	<b>Reasons for rejection or selection in Plan Making</b>
Option 1 – Shudrick Valley	<p>This option was rejected because:</p> <ul style="list-style-type: none"> <li>- Significant negative landscape effect</li> <li>- Loss of best and most versatile agricultural land</li> <li>- Significant negative historic environment effect.</li> </ul>
Option 2 – Canal Way	<p>This option was selected because:</p> <ul style="list-style-type: none"> <li>- No significant negative effects were identified</li> <li>- Evidence of deliverability</li> <li>- Greater potential to mitigate adverse effects</li> <li>- Potential to expand the main sports provision in the town</li> </ul>

Options for Direction of growth at Ilminster	Reasons for rejection or selection in Plan Making
	<ul style="list-style-type: none"> <li>- Within reasonable proximity to the town centre.</li> </ul>
Option 3 – North	<p>This option was rejected because:</p> <ul style="list-style-type: none"> <li>- Lack of evidence of land availability/deliverability</li> <li>- Loss of best and most versatile agricultural land</li> <li>- Significant negative landscape impact</li> <li>- Significant negative impact on biodiversity.</li> </ul>

## SA of Proposed Main Modifications to the Local Plan

31. The additional work undertaken by the Council to address the Inspector's Preliminary Findings form the basis for the Proposed Main Modifications to the Submission Local Plan 2006 - 2028. The Proposed Main Modifications were placed on public consultation between 28 November 2013 and 10 January 2014. Over 1,000 representations were received on the Proposed Main Modifications Consultation Document (Nov 2013) and these, along with updated evidence, have resulted in changes to the Proposed Main Modifications. The Council consider that the proposed modifications address the Inspector's concerns and will deliver a sound Local Plan.
32. It is important to ensure that the Proposed Main Modifications are screened through the SA process to determine if they significantly affect the findings of the SA and further appraisal work is required. The Council commissioned independent consultants Enfusion in February 2014 to carry out a screening of the Proposed Main Modifications to ensure that all significant changes to the Local Plan have been given appropriate consideration through the SA process. A number of Minor Modifications have also been proposed by the Council<sup>7</sup>, which mainly relate to minor changes in text to provide further clarification. These changes are considered to not significantly affect the findings of the SA.

## Policies YV1 and YV2

33. The amendment to remove development proposed after the plan period would reduce the longer term positive effects relating to communities, housing and the economy, as well as reduce the longer term negative effects on traffic, landscape, heritage and pollution. However, this was not considered to change the significance of the policies during the life of the plan, and therefore the removal of housing after the plan period would not significantly affect the findings of the original<sup>8</sup> appraisal of policies YV1 and YV2.
34. The other key modification for policy YV2 was the change from a single to a two site urban extension, which did require a revision of the SA. The revised appraisal for Policy YV2 found that significant positive effects are still likely for housing and employment objectives, and minor positive effects on access to services and facilities

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<sup>7</sup> Proposed Submission Local Plan Core Docs 3b and 3c (Feb & June 2013); and Proposed Minor Modifications M93 - 97 (Nov 2013) <http://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/local-plan-2006-2028/submission-local-plan/development-plan-documents/>

<sup>8</sup> Set out in Appendix 7 of the Local Plan SA report, June 2012.

and health through the provision of a primary school, health centre and neighbourhood centre as part of each urban extension. Negative effects are identified upon the landscape, and there is some uncertainty regarding historic environment and biodiversity impact until project level surveys are carried out. The loss of best and most versatile land is a significant long-term negative effect, and minor long term negative effects are also identified on traffic.

### **Policy YV6**

35. The key changes for policy YV6 are a reduction in the non-car travel requirement (from 50% to 30%) originating from the urban extensions, and the deletion of some criteria for delivering sustainable travel at the Yeovil urban extensions. Whilst these changes might reduce the positive effects relating to access to services/facilities, poverty and social exclusion and traffic, it is still considered likely that the policy has potential for significant long term positive effects. It is concluded that the proposed changes do not significantly affect the findings of the original appraisal of policy YV6.<sup>9</sup>

### **Policy PMT3**

36. The key modification proposed for this policy is the change in the direction of growth from the south east to the south west of Ilminster. The appraisals of the options for the Ilminster direction of growth have been revised/ updated to address the Inspector's concerns set out in the Preliminary Findings. While the proposed modifications are significant, the policy essentially directs growth to Canal Way and is therefore considered to have the same effects as those identified through the revised appraisal for Option 2 (Canal Way), which were set out earlier in this NTS.

### **Policy SS3 – changes to employment land requirements**

37. The more robustly evidenced employment land figures are likely to enhance the already positive economic effects. Although additional employment land at some of the settlements may cause increased traffic and pollution, the increasing self-containment and mitigation to promote sustainable travel should off-set this. The reduction in employment land in some settlements, particularly Ilchester, Milborne Port and South Petherton would reduce the significance of positive effects against SA Objective 7 (Support a strong, diverse and vibrant local economy) for those settlements. However, it would also reduce potential negative effects against SA Objectives relating to the environment. Overall, the sustainability effects of the reduction should be considered positive as this provides the objectively assessed employment land provision for the settlements, and the District as a whole, facilitating a balanced economic growth profile for the District.

### **Policy SS3 and Policy SS5 – Employment and housing development in directions of growth**

38. The amendments seek to clarify the delivery of development in the directions of growth, in advance of the Site Allocations Development Plan Document (which will also be subject to SA). The amendments could potentially deliver more housing and

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<sup>9</sup> As set out in Appendix 7 of the SA report (June 2012).

employment development in the short term, but significant positive effects are already identified for these SA objectives. The need to consider an appropriate scale of growth and other policies (in the NPPF and Local Plan) mean that the impacts of new employment and housing development are fully addressed. Overall, it is considered that the sustainability effects are likely to be similar to those previously identified.<sup>10</sup>

### **Policy HG7 – Gypsies, travellers and travelling showpeople**

39. The addition of targets within the policy reflecting identified need in updated evidence should lead to enhanced positive effects by providing more certainty for the travelling and settled communities alike. The other effects are likely to remain the same as previously set out.

### **Mitigation measures**

40. Mitigation measures are recommended to reduce the potential negative effects of a policy/proposal. Some of the additional mitigation measures which are recommended for policy YV2 are to:
  - Provide/improve pedestrian links to the Yeovil Country Park, Wyndham Park and the wider countryside;
  - Demonstrate that the findings and mitigation set out in the Peripheral Landscape Study Addendum have been taken into account;
  - Produce an Archaeological Assessment, and seek opportunities to enhance the setting of the Roman Villa north of Dunnock's Lane;
  - Produce a bat survey and assessment;
  - Seek opportunities for passive solar gain.
41. Some of the mitigation measures that are suggested for the direction of growth at Ilminster are:
  - Ensure that good walking/cycling links are provided to the town centre;
  - Avoid development on the steeper southern slopes to limit visual impact;
  - Use sustainable construction methods;
  - Incorporate Sustainable Drainage Systems to manage and reduce flood risk;
  - Ensure that mitigation limits the effect on Pipistrelle Bats (at the project level and through other Local Plan policies).
42. The mitigation measures suggested for Policy SS3, SS5 and HG7 include:
  - Focus development at locations that have the best potential to access jobs, services, shops and facilities;
  - Prioritise sustainable travel;
  - Incorporate high quality design and landscaping;
  - Seek to avoid developing on best and most versatile agricultural land;
  - Add criterion related to ensuring accessibility to services to policy HG7.

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<sup>10</sup> As set out in Appendix 7 of the SA report (June 2012).

## **Monitoring**

43. It is important that regular monitoring takes place to assess the impact of the policies, and help highlight where action is required to address any unforeseen adverse effects. The following table outlines some examples of the potential significant effects and monitoring indicators.

Figure 12: Examples of Significant effects indicators

<b>Potential effect</b>	<b>Indicators (source)</b>
Ensuring access to services and facilities in rural areas	Number of Super Output Areas (SOAs) in South Somerset where 'Road distance to GPs, Hospitals, Primary Schools and Post Offices' is in worst 20% nationally (Indices of Multiple Deprivation).
Meeting housing need across South Somerset	Net additional homes provided, including affordable homes (SSDC); Provision of gypsy and traveller sites (SSDC).
Promoting healthy lifestyles	Obesity among primary school age children in Year 6 (NHS Profile); Healthy life expectancy (NHS Profile).
Supporting the economy	Average earnings of employees (Office for National Statistics); Overall employment rate (ONS).
Increase in the number of journeys made by car	Travel to work – modal split (Census).
Loss of Greenfield land	% of new homes built on previously developed land (SSDC).
Increase in carbon dioxide emissions	Per capita CO <sub>2</sub> emissions (Dept of Energy and Climate Change).
Increase in number of flood incidents	Number of planning permissions granted contrary to the advice of the Environment Agency (EA) on flooding grounds (EA).

## **Summary and next steps**

44. Further work has been carried out to address concerns raised by the Local Plan Examination Inspector's Preliminary Findings, and the Proposed Main Modifications have been subject to public consultation. This is the Non-Technical Summary of the SA reports for the Strategic Growth Options for Yeovil (October 2013), Local Plan Proposed Main Modifications (November 2013), and the SA Addendum Report (March 2014).
45. The baseline information and plans, programmes and policies review have been refreshed to provide an updated basis for appraisal. The sustainability issues and the relationship between the SA objectives and the National Planning Policy Framework have also been explained more clearly.
46. The reasonable strategic growth options for Yeovil were subject to a fresh and independent SA. Alongside some further planning criteria this informed the decision to propose two sustainable urban extensions at Upper Mudford (in Area D) and Coker (in

Area B). The SA review of the Direction of Growth at Ilminster informed the amendment to Policy PMT3 now being proposed.

47. As a result of this further work the Council has proposed a number of Main Modifications to the Local Plan, which includes the removal of the housing requirement after the life of the Plan and changes to the proposed location of strategic development. While there is the potential for a reduction in the duration of identified effects as a result of the removal of the housing requirement post plan period, the overall level of growth proposed during the life of the Local Plan has not changed. Therefore, the nature and significance of the effects identified through the SA during the life of the Plan remains the same.
48. Changes to the proposed location of development, in particular changes to the directions for strategic growth in Yeovil and Ilminster, have been subject to further detailed appraisal to ensure that significant effects are identified and addressed.
49. The majority of consultation responses did not require any further action, but it is agreed that some further work was required to provide further clarity and address representations relating to the potential effects of the Proposed Main Modifications. These have been carried out and have been approved by the Council's decision making processes, including the Project Management Board, District Executive and Full Council.
50. This Non-Technical Summary and the SA reports for the Strategic Growth Options for Yeovil (October 2013), Local Plan Proposed Main Modifications (November 2013), and the SA Addendum Report (March 2014), will be submitted to the Planning Inspector on 18 March 2014 alongside the Local Plan Proposed Main Modifications. The SA reports and other evidence base will then be considered in the resumed Local Plan Examination, with the Hearing Sessions likely to take place in June 2014.