

South Somerset District Council: Local Plan 2006 – 2028

Resumed Independent Examination

South Somerset District Council Hearing Statement

**Issue 4: North East Yeovil Sustainable Urban Extension
(PMM2)**

May 2014

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Question 4.1: Is the vision for growth and change in this area justified and based on an appropriate sustainability appraisal?

- 4.1.1 The strategy of the Proposed Submission Local Plan is to focus growth at Yeovil based upon its role, function and capacity to accommodate development [CD3a, Chapter 4]. This strategy is supported by the evidence base, including the Settlement Role and Function study [CD34], Housing requirement for South Somerset and Yeovil report [CD30], and the Sustainability Appraisal [CD16]. The majority of new development at Yeovil is proposed to take place in the existing urban area, which has a potential capacity of 5,876 dwellings [CD3b, M85-86, M89]. This requires 1,565 dwellings (and accompanying community facilities and services) on the edge of the town in order to deliver the Local Plan strategy of around 50% of development at Yeovil, and 50% elsewhere in South Somerset. The employment land requirement of 5.16 hectares alongside this housing figure is based upon the intention to provide one job opportunity per dwelling at the sustainable urban extensions [CD11, para 4.12; CD159, Table 1].
- 4.1.2 Following the Local Plan Inspector's Preliminary Findings (3 July 2013), further evidence was undertaken in order to inform the most appropriate location(s) for a sustainable urban extension to Yeovil. A fresh and independent Sustainability Appraisal (SA) produced by expert consultants 'Enfusion' formed a key part of the evidence [CD161a, b, d, e] and addresses the Inspector's concerns; other evidence prepared following the Preliminary Findings includes an Addendum to the Yeovil Peripheral Landscape Study [CD68v] and updated traffic modelling [CD164].
- 4.1.3 As these are strategic options for a direction of growth, rather than specific site allocations, it was considered that potential options should be capable of delivering at least 500 dwellings as this was the minimum size necessary to promote a more sustainable development, such as a primary school or on-site formal playing fields and other community facilities [CD161b, para 3.22]. The justification for seeking a larger scale of development with more potential for a mix of uses, rather than allowing more 'piecemeal' smaller developments, is consistent with the National Planning Policy Framework (NPPF) which promotes mixed use developments (para 17, 37-38, 58, 69); ensures an integrated approach to considering the location of housing, economic uses and community facilities and services (para 70); and ensures developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable travel modes can be maximised (para 34).
- 4.1.4 The findings of the fresh and independent SA informed the Council's decision-making process and the progression of PMM2. The Strategic Growth Options for Yeovil SA [CD161b] initially considered opportunities for strategic directions of growth all around the edge of Yeovil (i.e. a 360 degree search). Several areas were not considered further for reasons including landscape impact, flood risk, and adverse impact on the historic environment; resulting in four areas being considered as 'reasonable alternatives' and being taken forward to be appraised against the SA objectives: Area B 'Coker'; Area C 'Middle Yeo Valley and Dorset Hillsides'; Area D 'Upper Mudford';

and a multi-site option consisting of Areas A 'Brympton d'Evercy', B, C and D [CD161b, para 3.15 – 26].

4.1.5 Although there were some key differentiators between the options relating to the historic environment, flooding and loss of agricultural land, the SA did not identify a clear preferred option. Therefore, further planning criteria were developed which focused on deliverability and viability consistent with the NPPF (e.g. paras 17, 47, 173, 182), but also considered other matters such as the provision of services and facilities, and further mitigation potential [CD162]. The four options highlighted above were assessed against these planning criteria [CD163], and considered further landscape evidence [CD68v]; concluding that Areas B and D should be selected for the location of two sustainable urban extensions as this will:

- Improve deliverability/viability;
- Reduce site specific impacts upon infrastructure and allow the council to make use of CIL to provide facilities in the most appropriate location;
- Reduce the loss of grade 1 agricultural land in Area B;
- Reduce the potential negative effects on heritage assets through development in Area B;
- Reduce impacts on the landscape by containing built form within logical landscape boundaries;
- Link well with the existing community and offer the potential for improvements to routes and services over a wider area;
- Still deliver services and facilities to the benefit of the surrounding community [CD161b, Table 4 and CD161e, Figure 7].

4.1.6 The findings of the fresh and independent SA have been subject to consultation with statutory consultees and the public – the SA Addendum details responses received and how they have been addressed through the SA process [CD161d, i]. Therefore, PMM2 is based upon an appropriate and sound SA.

4.1.7 The scale of growth for approximately 765 dwellings in the North East Yeovil Sustainable Urban Extension (SUE) is based upon evidence of deliverability [including CD45 and the Strategic Housing Land Availability Assessment update 2013; and PMM consultation responses e.g. Comment ID 591], and environmental constraints in particular the advantage of containing development within credible landscape boundaries and having capacity for ready mitigation [CD68w]. In addition, updated traffic modelling evidence shows that the impacts upon the highway network are slightly less significant where the development is spread over two locations, rather than a single site, as traffic is diluted between the north and south of Yeovil [CD164, para 7.6.2].

Question 4.2: Have the implications of development in the North East Yeovil Sustainable Urban Extension been appropriately addressed with regard to:

- **Landscape and topography**
- **Biodiversity and geodiversity**
- **Historic assets**
- **Flood risk**
- **Highway safety**
- **Sustainable travel**
- **Agricultural land value**
- **The provision of infrastructure, services and facilities (including employment, waste water, education and health)**
- **Pollution.**

Landscape and topography

- 4.2.1 Evidence on landscape impact has been an important consideration in the decision to pursue the North East Yeovil SUE. Indeed, the study areas in the Peripheral Landscape Study Addendum [CD68v] informed the choice of options considered in the revised SA [CD161b, para 3.15 – 3.26]. The landscape study addendum was prepared in response to the Inspector's Preliminary Findings (July 2013) which: considered potential mitigation strategies, identified and reviewed potential study areas, identified opportunities to enhance the landscape and assimilate development into the town's setting, and identified potential site options and appropriate mitigation [CD68v, para 1.4]. Topography was considered as part of the landscape studies, which included identifying (and avoiding) areas of steep gradient [CD68s], and as part of a mitigation strategy [CD68v, para 2.3].
- 4.2.2 Around half of the North East SUE has a moderate landscape capacity to accommodate built development, with the remaining area identified as having a moderate-low and low capacity [CD68t]. The landscape addendum identified land at Upper Mudford (Area D) as having potential for development subject to mitigation measures that address the separation from local rural settlements, precluding development on the sensitive lengths of skyline and upper scarp slopes, and ensure robust structural landscape treatment on the development edge [CD68v, para 5D.8 and 6.3]. A subsequent landscape report outlined that, based upon the findings of the Landscape Addendum; a site of around 765 dwellings at Up Mudford would be the preferred landscape option [CD68w].
- 4.2.3 The findings of this landscape evidence informed the further SA work relating to alternatives and PMMs. The revised appraisal of Policy YV2 found that once mitigation has been considered there is potential for a minor medium to long term negative effect; some key recommendations for subsequent masterplans are also outlined [CD161b, ii and CD161d, iv]. Mitigation will be provided through Policy YV2 which continues to advocate 'Garden City' principles, a target for 40% open space provision [CD3d, AM12], Policy EQ2 which seeks high quality design standards, and Policy EQ5 which promotes green infrastructure.

- 4.2.4 The approach taken to addressing landscape and topography is consistent with national policy (NPPF, para 17, 109, 170) and guidance (Planning Practice Guidance paragraph 001, Ref ID: 8-001-20140306).

Biodiversity and geodiversity

- 4.2.5 The likely significant effects of the North East Yeovil SUE upon biodiversity and geodiversity are set out in the SA report [CD161d, iv]. There are no statutory designated sites within or adjacent to the direction of growth [CD161d, iv], but a Local Wildlife Site is present to the north. Evidence indicates that otters and bats (European Protected Species) could be present in the area – the impact on otters is considered extremely unlikely, but mitigation measures are suggested to minimise the potential impact on Daubenton's bats which are a riverine species [CD65, Table 3]. However, the area considered in this study extended further east than the North East Yeovil SUE.
- 4.2.6 Policy YV2 [CD159] ensures that features supporting bat movement in the South Yeovil SUE will be protected, reflecting the findings of the Habitats Regulations Assessment [CD8 and 8a, b], and Policy EQ4 requires all proposals to protect and enhance biodiversity and minimise fragmentation of habitats [CD3a]. In addition, there is an intention for 40% of the development to be open space, providing further potential for mitigation [CD3d, AM12].
- 4.2.7 The revised appraisal of Policy YV2 found that significant effects as a result of proposed development are unlikely given the mitigation available at the project level and provided by Local Plan policies. However, there is still an element of uncertainty until project level surveys and assessments have been completed [CD161div].
- 4.2.8 The approach outlined above will ensure that biodiversity is conserved and enhanced, consistent with national policy (NPPF para 109, 114, 117).

Historic assets

- 4.2.9 Evidence on the value of the historic environment [CD104] has been a key determinant in considering the location of the sustainable urban extensions, in line with national policy (NPPF, para 169). The North East SUE has a Grade II listed building on its western edge, and is identified as being within an area of high historic landscape sensitivity but low historic asset sensitivity [CD104a, Area 15 'Sensitivities'; and Figure 2.9]. The evidence considers that there is a moderate capacity to absorb built development in this area [CD104, Figure 2.11].
- 4.2.10 The Archaeological Issues report¹ notes the extensive and significant remains that have been found on the Wyndham Park development, and states that it is very likely that the buried archaeological remains continue into the North East SUE (para 2.1.1). This report recommends that all proposals should be archaeologically assessed and contain a detailed archaeological mitigation strategy, and community engagement programmes should be undertaken where appropriate (para 5). It should be noted

¹ South Somerset Local Plan Proposed Modifications Archaeological Issues, Somerset County Council, January 2014 – submitted in consultation on the PMMs Comment ID 937.

that English Heritage have no outstanding objections, and support the comments from Somerset County Council in the Archaeological Issues report.² The revised appraisal of Policy YV2 considered that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, but there is an uncertainty until further detail is known and further project level surveys are carried out [CD161d, iv].

4.2.11 Policy EQ3 [CD3a] states that all new development proposals will ensure that heritage assets are conserved and enhanced, and the Council intend to produce a Heritage Strategy that will provide comprehensive advice to ensure high standards of development [CD3a, para 12.40, 12.41].

4.2.12 It is considered that heritage assets have been appropriately addressed and, in taking the actions highlighted above through the Site Allocations DPD/development management process, suitable mitigation is available to ensure that historic assets can be conserved and enhanced, consistent with national policy (NPPF para 17, 126, for example) and guidance (Planning Practice Guidance paragraph 004 Reference ID: 18a-004-20140306).

Flood risk

4.2.13 The North East Yeovil SUE is located entirely in Flood Zone 1, and therefore has a low risk of fluvial flooding [CD70a and b³]. This evidence informed the SA, which identifies a 'neutral' effect in relation to flood risk [CD161div]. Policy EQ1 [CD3] ensures that proposals for new development will be directed away from medium and high flood risk areas, incorporating Sustainable Drainage Systems (SuDS) and through appropriate layout, design and choice of materials. Further detail on managing flood risk for the proposed development will be required through the Site Allocations DPD and/or development management process – the Environment Agency consider that further work will be required within the masterplanning process to more accurately map any local flood risk issues; and that there will be an engineering solution to surface water runoff.⁴ This approach is consistent with national policy (NPPF, para 100).

Highway safety

4.2.14 Traffic modelling has been undertaken by consultants, in conjunction with Somerset County Council as the Highways Authority, to ensure that the highways impact of the South Yeovil SUE is adequately addressed [CD164]. The modelling report assessed four development options, including an option incorporating the North East Yeovil SUE and the South Yeovil SUE. The following indicators were assessed: journey time comparison, traffic flows on key roads, key junction performance, and network summary statistics. Although some junctions are forecast to suffer from congestion in the 'reference case' (i.e. development being spread across the town), no

² English Heritage PMM response – Comment ID 673.

³ Latest extent of the flood zones also checked on the Environment Agency website (on 15.05.2014) still identified the area as being Flood Zone 1.

⁴ Environment Agency Local Plan PMM consultation response Comment ID 548.

significant highways impacts are identified in relation to the North East Yeovil SUE specifically [CD164, Table 7.1].

- 4.2.15 As with previous traffic modelling studies, the differences between the development options and travel demand scenarios are subtle, with no obvious preferred option. Background traffic growth is the major contributor to deterioration of highway network performance, rather than the specific impacts of the proposed development sites. There are slightly less significant impacts on the highway network where the traffic is spread over two urban extensions, as the traffic is diluted between the north and south of Yeovil [CD164, para 7.3.3, 7.4.1, 7.6.1-2].
- 4.2.16 Following a review of the latest traffic modelling evidence, the Highways Agency (HA) noted (See Appendix A) that there would not be significantly different flows along the A359 towards the A303 at Sparkford when compared to the reference case, and note that Cartgate Roundabout will be operating over capacity, and may therefore seek contributions where appropriate to mitigate this impact.
- 4.2.17 The Yeovil Transport Strategy Review 2 (YTSR2) will be completed following adoption of the Local Plan, which will identify highways improvements required as a result of development in Yeovil, and highlight these for the Infrastructure Delivery Plan and inform the Community Infrastructure Levy process.
- 4.2.18 The revised SA of Policy YV2 considered that suitable mitigation is available through the Local Plan and at the project level to address localised transport impacts, with the potential for residual minor long-term negative effects on traffic. The impact on highways safety will be considered in further detail through the Site Allocations DPD/development management process, as required in Policies TA1, TA3, TA4, TA5 and YV6 [CD3a-c] – these policies also consider ways of mitigating highways impact through encouraging sustainable travel, as outlined below.

Sustainable travel

- 4.2.19 Policy YV6 in the Local Plan Proposed Main Modifications [CD159] outlines the approach to delivering sustainable travel at the SUEs. This includes a non-car travel requirement of at least 30% of travel originating from the SUEs, subject to viability, informed by evidence produced by Somerset County Council [CD165]. This minimum figure is considered to be realistic but challenging, reflecting the baseline for non-car modes at the SUEs being 15-30% of journeys [CD165, section 3].
- 4.2.20 The location of the North East SUE offers opportunities to utilise existing bus links in the area [SSDC Mid hearing document H023]. Future proposals should be considered in line with Policy YV6 which seeks sustainable travel links to key travel destinations, including the town centre, main employment sites and transport interchanges. The potential for sustainable travel links are currently being considered through pre-application discussions with the prospective developer, and should be addressed through any planning application.

Agricultural land value

- 4.2.21 Agricultural land quality is an important issue which was considered as part of an independent SA (objective 12) which appraised each potential 'reasonable alternative' in a consistent and robust manner [see CD161b, d, e].
- 4.2.22 It is important to reflect that the NPPF asks Local Planning Authorities to take into account the economic and other benefits of the best and most versatile (BMV) agricultural land; and that land which is classified as BMV agricultural land is defined as Grades 1, 2 and 3a. Therefore, when seeking to robustly and consistently appraise potential growth options it is only correct to judge the impact on the BMV agricultural land, and in so doing treat the impact on Grade 1 land equitably with the impact on Grade 3a land.
- 2.1 The SA considers agricultural land value under the terms of BMV agricultural land. It records that BMV agricultural land surrounds most of Yeovil [CD135a-g]. The North East Yeovil SUE predominantly contains Grade 3b agricultural land, but does include BMV agricultural land. [CD135g]. The revised SA (October 2013) of Policy YV2 found that there is the potential for a permanent significant long-term negative effect through the loss of that land [CD161d, iv].
- 4.2.23 The Council utilised this information, along with further planning criteria, to select a reduced scale of development over two sites, including Area D, to reduce the impact on the BMV agricultural land [CD161b, Table 4]. This demonstrates that the Council have sought to use areas of poorer quality land in preference to that of a higher quality, consistent with national policy (NPPF, para 112).
- The provision of infrastructure, services and facilities (including employment, waste water, education and health)**
- 4.2.24 PMM2 outlines that the North East Yeovil SUE should deliver employment land, education, health facilities, and a neighbourhood centre, alongside housing development. This policy for a mix of uses is consistent with the National Planning Policy Framework (NPPF), as highlighted in paragraph 3.1.3 of this statement.
- 4.2.25 The provision of infrastructure, services and facilities will be considered in more detail through the Site Allocations DPD/development management process, but initial discussions with the developer indicate a willingness to deliver the infrastructure, services and facilities identified in Policy YV2 and PMM2. The Council's analysis also indicates that there is an opportunity for the site to help address shortfalls in infrastructure provision at other adjacent and nearby sites.
- 4.2.26 The employment land requirement of around 2.58 hectares of employment land is set out in Policy YV2 and Policy SS3 (captured in both PMM1 and PMM4). This figure is derived from the intention to balance the provision of jobs and homes, consistent with the overarching objective of the SUEs to deliver the highest possible sustainability objectives, subject to viability. The final detail on scale of employment provision and job potential will be expected to be defined and agreed as part of either the Site

Allocations DPD, or the development management process accompanying a planning application.

- 4.2.27 The provision of waste water infrastructure is of primary relevance at the Site Allocations/development management stage, when further detail will be required. At this stage, no exceptional sewerage infrastructure has been requested in relation to development at Yeovil [CD163, 'Infrastructure Notes from Draft IDP in relation to Yeovil Development']. This approach is reflected by Wessex Water who request to be fully engaged during the Site Allocations DPD and masterplanning process, and state that detailed engineering appraisal will confirm satisfactory points of connection for water supply and waste water services.⁵
- 4.2.28 Development at the North East Yeovil SUE would require the provision of a primary school. Development across the whole of the town of Yeovil will generate a number of secondary school places [CD163, 'Infrastructure Notes from Draft IDP in relation to Yeovil Development']. Evidence indicates that secondary school capacity may become an area of concern in approximately 2022.
- 4.2.29 The Council is engaged with Somerset County Council (SCC) to better understand and create a programme of work to develop a solution to the capacity concerns. The Council and SCC have prepared a Statement of Common Ground confirming current education capacity and demand, and confirming a joint approach to developing solutions in the medium to long term. See the Statement of Common Ground submitted on the 27th May 2014.
- 4.2.30 In addition, the Council has sought an additional modification to the Local Plan to ensure that Policy SS6 includes the opportunity to gain education-related contributions from future development [see CD3d, AM10].
- 4.2.31 Infrastructure providers were given a further opportunity to comment under the Duty to Cooperate in order to ascertain if they had any issues to raise following the close of consultation on the PMMs – no responses were received from the infrastructure providers relevant to issues associated with the North East Yeovil SUE [CD160, Appendix 8].
- 4.2.32 The revised SA of Policy YV2 found that there is potential for a minor long-term positive effect as development will provide a primary school, health centre, neighbourhood centre and 2.5 ha of employment land [CD161d, iv].
- 4.2.33 More specific detail on infrastructure, services and facilities provision will be included as part of masterplanning work and the Site Allocations DPD. Policy SS6 (as amended) sets out the overall approach to infrastructure delivery [CD3]. Furthermore, initial discussions with the prospective developer of the North East Yeovil SUE indicate a general willingness to deliver the infrastructure, services and facilities in PMM2.

⁵ Wessex Water representation on Proposed Main Modifications, January 2014, Comment ID 522.

Pollution

- 4.2.34 The SA identifies potential for a short term negative effect at the North East Yeovil SUE with regards to minimising pollution, due to the potential for waste, noise and dust pollution to be created during construction. The SA considered that suitable mitigation is provided through Proposed Submission Local Plan Policies EQ2 and EQ7 (as amended through the Local Plan Examination) to ensure that there are no significant effects, resulting in a residual 'neutral' effect [CD161d, iv].
- 4.2.35 Consultation responses relating to PMM2 also raised issues regarding the high pressure gas pipeline and the possible presence of anthrax in the NE Yeovil SUE – the Council have prepared detailed responses to subsequent questions from the Inspector on these issues which can be viewed at:
<http://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/local-plan-2006-2028/local-plan-examination/local-plan-examination-hearing-sessions---statements-and-updates/>

Question 4.3: Is the Urban Extension deliverable?

- 4.3.1 The location of the North East Yeovil SUE is identified as being suitable, available and viable in the Strategic Housing Land Availability Assessment [CD45] and the recent SHLAA update published in December 2013.
- 4.3.2 The deliverability of the North East Yeovil SUE has been confirmed in consultation on the PMMs from the prospective developer of the site.⁶ More recently, pre-application discussions have been held between the Council and the prospective developer; the developer has carried out public exhibitions for the site (e.g. on April 7th and 8th 2014) and has held meetings with the local parish council. A Statement of Common Ground is currently being prepared with the developer, who has indicated that a planning application for the North East Yeovil SUE, broadly consistent with PMM2, will be submitted imminently.

⁶ Boyer Planning PMM representation, Comment ID 591.

APPENDIX A – Email from the consultant representing the Highways Agency regarding Yeovil and Ilminster (19.02.2014)

Keith,

Andy and I have now had the opportunity to review the meeting notes and very modest changes are suggested in the attached document. We have also reviewed the data supplied over recent days relating to:

- A) Up Mudford – forecast Impact on the trunk road;
- B) Future operation of Cartgate Roundabout with the completion of the pinch point scheme; and
- C) Changed direction of growth at Ilminster – forecast impact at Southfields Roundabout.

Each is discussed in turn below.

A) Up Mudford – forecast Impact on the trunk road

The PB Non-Technical Forecasting Addendum Report 3 examines forecast changes in traffic flows on 19 key roads in Yeovil, including A359 Mudford Hill, north of the proposed urban extension at Up Mudford. This route leads to the A303 at Sparkford. On the basis of the information provided in the report, and assuming all traffic at the count point continues to and from the trunk road, it would appear that neither the 30% or 50% non-car mode share scenarios give rise to significantly different flows on the link when compared to the reference case (which assumes no urban extension and development spread across Yeovil).

B) Future operation of Cartgate Roundabout with the completion of the pinch point scheme

The *Non-Technical Forecasting Addendum Report 3* identifies that the Cartgate Roundabout (in its current layout) is forecast in 2028 to be over capacity on the two A303(T) approaches in the AM peak and on the A3088 arm in the PM peak. Whilst the Pinch Point Scheme will provide benefits over existing layout in future year scenario, the A303 eastbound approach will remain over capacity and the A303 westbound approach will near capacity. As a result, the Agency may, where appropriate, seek contributions from developments to mitigate this impact.

C) Changed direction of growth at Ilminster – forecast impact at Southfields Roundabout

The calculations provided by the County Council show that additional trips onto the Southfields Roundabout arising from an allocation at Ilminster will be fairly small and they do not unduly concern the Agency at this stage. Where appropriate, applications as they come forward will have to demonstrate their impact on the trunk road.

I trust that this is of assistance.

With regards,

James Purkiss

James Purkiss | Senior Planner, Urban Programmes

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