

South Somerset District Council – Detailed Analysis of Consultation Responses to Further Main Modifications

The following table provides a summary analysis of responses received during the consultation process for the further Main Modifications to the South Somerset Local Plan (2006-2028). It is important to note that these tables do not provide a response to all of the consultation responses received. Instead they focus on those main issues which require clarification or analysis. The responses have been grouped by each of the further Main Modifications and also by theme.

Introduction and Background

Issue – Miscellaneous	SSDC Response
Object to building on Grade 1 agricultural land.	This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed through the resumed Examination Hearing Sessions and through the Sustainability Appraisal of growth options. Recommendation: No change
Should prioritise development on brownfield sites.	This issue is not specifically relevant to the Main Modifications consultation. Policy SS7 addresses this issue, and is consistent with the National Planning Policy Framework (NPPF). Recommendation: No change
Object to development at Keyford due to traffic impact.	This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed through resumed Examination Hearing Sessions. Recommendation: No change
Infrastructure, employment potential and the town centre cannot sustain the Keyford urban extension.	This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed through the Proposed Main Modifications and resumed Examination hearing sessions. Recommendation: No change
The expectation of one person per household working in the urban extension is unrealistic.	This issue is not specifically relevant to the Main Modifications consultation. The provision of one job opportunity per dwelling is consistent with the sustainability intentions of the Yeovil Sustainable

	Urban Extensions. Recommendation: No change
East Coker should be defined as a Rural Centre and more development should be allowed here.	This issue is not specifically relevant to the Main Modifications consultation. The settlement hierarchy has been debated through the Examination Hearing Sessions and has not been questioned by the Inspector in terms of soundness of the Local Plan. Recommendation: No change
The policy for controlling development in Rural Settlements is too restrictive.	
The North East Yeovil sustainable urban extension suffers from anthrax contamination.	This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed through the Proposed Main Modifications and resumed Examination hearing sessions. Recommendation: No change
Taking samples from the NE Yeovil SUE may be too expensive for the developer and could be dangerous for builders, nearby residents and future residents.	This issue is not specifically relevant to the Main Modifications consultation. Any potential safety issues will be considered through the development management process.
Natural England are satisfied with the HRA addendum report.	Support noted. Recommendation: No change
Environment Agency reiterate that plan is sound and Policy EQ1 ensures flood risk issues will be addressed. There will be an engineering solution to surface water runoff, but consider undertaking a Flood Risk Management Strategy to provide further detail.	Support noted. Recommendation: No change

Main Modification 9: Policy YV2 – North East Yeovil Sustainable Urban Extension

Issue – Economic Development	SSDC Response
The amendment gives a much wider and less controlled scope for inappropriate development – a more limited definition of employment use should be included within the policy.	The amendment is required to be consistent with Policy SS3 and to be consistent with the NPPF. This was considered through the original Examination Hearing Sessions in May-June 2013 and debated in the resumed Examination Hearing Sessions in Jun 2014. Recommendation: No change
Support the change from ‘B’ use class employment land, to land for economic development.	Support noted. Recommendation: No change
Issue – Landscape	SSDC Response
Landscape mitigation text should also be added to the South Yeovil SUE to limit the skyline dominance of built form, particularly from properties to the south and west, and the potential for visual intrusion as viewed from the southern approach to Yeovil. The Peripheral Landscape Study Addendum indicates landscaping is required for both sustainable urban extensions.	Evidence in the Peripheral Landscape Study indicates that the South Yeovil SUE is located in an area of mostly ‘moderate-high’ capacity to accommodate built development, albeit there is a small area of lower capacity in the north east corner of the site. This evidence indicates that the South Yeovil SUE is less sensitive in terms of landscape impact than the North East SUE, and therefore the inclusion of additional detail on landscape mitigation measures at the South Yeovil SUE is not considered to be justified. The landscape mitigation impacts generated by any development proposal can be resolved through the development management process. Recommendation – No change.
The landscape impact of the South Yeovil SUE would be greater than in the North East due to beautiful rolling hills, the nearby Dorset AONB and historic buildings, yet it does not require landscape mitigation measures. Development on the north east edge will be highly visible. Therefore, landscape mitigation text should be added to the South SUE.	
Structural landscaping should also be included to mitigate the visual intrusion from the east of the proposed North East Yeovil SUE, to preserve views from villages in the area.	
Support the text on the mitigation of the landscape impact of the North East SUE.	
The landscape impact of developing the North East Yeovil SUE cannot be mitigated due to the slope and views from the Somerset Levels, Cadbury Castle and Dorset Hills.	The justification for proposing the North East Yeovil SUE is set out in the Proposed Main Modifications and resumed Examination hearing sessions. It is considered that mitigation measures can minimise landscape impact.

	<p>Recommendation – No change.</p> <p>Noted and agree with simplification of text.</p> <p>Recommendation –Amend Policy YV2 by deleting the draft sixth bullet point relating to landscape mitigation for the North East Yeovil sustainable Urban Extension and replace with the following bullet point criteria:</p> <ul style="list-style-type: none"> • <u>Landscape mitigation to address:</u> <ul style="list-style-type: none"> ○ <u>Potential massing effects across the site’s northward face; and</u> ○ <u>Potential visual dominance at the site’s edge and skyline.</u>
Support the text on landscape mitigation, but this should be simplified to read “landscape mitigation, to address (i) potential massing impacts across the site’s northward face, and (ii) potential visual intrusion at the site’s edge and skyline”. Supporting text should also be added.	
Issue – Other	SSDC Response
Badgers are present in the location of the North East Yeovil SUE, and a corridor should be included to protect wildlife from new development.	<p>This issue is not specifically relevant to the Main Modifications consultation. The policy context as set out in the NPPF and Local Plan Policy EQ4 will ensure that impacts upon wildlife are adequately addressed through the development management process.</p> <p>Recommendation: No change</p>
The North East SUE conflicts with the Mudford Neighbourhood Plan, and therefore contravenes Government policy on “localism”.	<p>Mudford does not have a formally recognised Neighbourhood Plan, agreed with the Local Planning Authority.</p> <p>The decision to identify a North East SUE is evidence-based and has been examined thoroughly through the Examination Hearing Sessions.</p> <p>Recommendation: No change</p>
The North East area designated for development should be used to establish a community wood to mitigate the impacts of urban sprawl and provide community benefits.	<p>This issue is not specifically relevant to the Main Modifications consultation. The justification for the North East Yeovil SUE was set out through the Proposed Main Modifications and resumed Examination hearing sessions.</p> <p>Recommendation: No change</p>
Object to development as it will ruin East Coker because of additional traffic and light pollution.	<p>This issue is not specifically relevant to the Main Modifications consultation. The impacts of the South Yeovil SUE were considered</p>

	<p>through the Proposed Main Modifications and resumed Examination hearing sessions.</p> <p>Recommendation: No change</p>
No objection to the further detailed changes being proposed to Policy YV2.	<p>Noted.</p> <p>Recommendation: No change</p>
Concerned about water run-off from the NE Yeovil SUE causing flooding downstream at Mudford and other villages. Surface water containment will be ineffective when there is non-stop rain like last winter.	<p>This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed the Examination Hearing Sessions. The policy context provided by the NPPF and Policy EQ1 provide will ensure that flood risk is adequately addressed through the development management process.</p> <p>Recommendation: No change</p>
At the NE Yeovil SUE should contain a surgery as existing GPs are overstretched.	<p>This issue is not specifically relevant to the Main Modifications consultation. The context provided by the NPPF and Policy HW1 will address this issue, which will be considered in more detail through the development management process.</p> <p>Recommendation: No change</p>
At the NE Yeovil SUE, there should be provision for cricket and tennis, and the football pitch should be full sized.	<p>This issue is not specifically relevant to the Main Modifications consultation. The context provided by the NPPF and Policy HW1 will address this issue, which will be considered in more detail through the development management process.</p> <p>Recommendation: No change</p>
Should not develop to the south because it is adjacent to St Margaret's Hospice.	<p>This issue is not specifically relevant to the Main Modifications consultation. The justification for the South Yeovil SUE was set out through the Proposed Main Modifications and resumed Examination hearing sessions.</p> <p>Recommendation: No change</p>
Housing and employment figures should be expressed as "up to", as the word "approximately" indicates a potential greater take up of land.	<p>This issue is not specifically relevant to the Main Modifications consultation. The justification for the SUEs was set out through the Proposed Main Modifications and resumed Examination hearing</p>

	<p>sessions. The inclusion of the words “up to” would be contrary to Policies SS3 and SS5.</p> <p>Recommendation: No change</p>
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Main Modification 10: Policy YV3 – East Coker and North Coker Buffer Zone

Issue – Deletion of Buffer Zone	SDDC Response
<p>Support the deletion of Policy YV3 as the smaller scale urban extension will not lead to coalescence with North and East Coker, and will not harm the character and historic environment. Retaining the policy would be contrary to the NPPF para 77 and Planning Practice Guidance.</p>	<p>Support noted.</p> <p>Recommendation: No change</p>
<p>Support the deletion of the buffer zone based upon the previous Local Plan Inspector saying of the Keyford site: “I do not believe that development on this land would lead to actual or perceived coalescence between the main built-up area of Yeovil and nearby villages. Sufficient physical and visual separation would remain.” (pg 459, LP Inspector’s Report, June 2003)</p>	<p>Support noted.</p> <p>Recommendation: No change</p>
<p>Object to the deletion of the buffer zone as there is a need to protect the wealth of heritage assets in the area (there are 89 listed heritage assets in East Coker parish).</p>	<p>Heritage assets will be adequately conserved and enhanced through the NPPF and Policy EQ3. There is a lack of justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE, and it is no longer considered to be consistent with national policy (NPPF para 76, 77) and guidance (PPG Ref ID 37-015-20140306).</p> <p>Recommendation: No change</p>
<p>Object to the deletion of the buffer zone as it is needed to protect East Coker from future development. The Council’s Five Year Housing Land Supply paper (June 2014) and Strategic Housing Land Availability Assessment (SHLAA) indicate further sites will be developed to the south of Yeovil towards East/North Coker.</p>	<p>There is a lack of justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE, and it is no longer considered to be consistent with national policy (NPPF para 76, 77) and guidance (PPG Ref ID 37-015-20140306).</p> <p>The Strategic Housing Land Availability Assessment is a technical document providing an appraisal of potential sites. It does not serve to allocate these sites or grant them planning permission, and each will be</p>

	<p>required to demonstrate they can achieve sustainable development and mitigate their impacts before receiving planning permission.</p> <p>The Five Year Housing Land Supply is also a technical document, providing an account of sites that can be shown to be deliverable within the next five years. It represents a 'snap-shot' in time and is subject to change and review. Where sites with planning permission are included these have been shown to represent sustainable development and are in accordance with national and local policy.</p> <p>Recommendation: No change</p>
The buffer zone should remain in order to protect Grade 1 agricultural land from development.	<p>Agricultural land quality has been discussed and addressed through the Proposed Main Modifications and resumed Examination hearing sessions. The use of a buffer zone to protect Grade 1 agricultural land would be contrary to national policy.</p> <p>Recommendation: No change</p>
The buffer zone should be increased to the edge of the South Yeovil SUE to protect the area from development, due to the impact upon wildlife and archaeology.	<p>Wildlife and archaeological impacts have been discussed and addressed through the Proposed Main Modifications and resumed Examination hearing sessions. There is a lack of justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE, and it is no longer considered to be consistent with national policy (NPPF para 76, 77) and guidance (PPG Ref ID 37-015-20140306).</p> <p>Recommendation: No change</p>
The buffer zone should be increased to cover the whole of the Keyford area as the housing proposals are based upon outdated ONS data and therefore not required.	<p>The scale of housing is not specifically relevant to the Main Modifications consultation. This topic was discussed and addressed through the Proposed Main Modifications and resumed Examination Hearing Sessions.</p> <p>Recommendation: No change</p>
Policy YV3 should be amended to establish a new Green Belt, extending through the Coker vale to the border with Dorset, and set an appropriate policy for development of settlements within the Green Belt. This is required to protect the preserve heritage	<p>The establishment of Green Belt to the south of Yeovil is not considered to be justified, effective or consistent with national policy (NPPF para 182). New Green Belt should only be established in exceptional circumstances (NPPF para 82) – it is not considered that these</p>

assets, landscape and high quality agricultural land.	<p>circumstances apply to the south of Yeovil.</p> <p>There is a lack of justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE, and it is no longer considered to be consistent with national policy (NPPF para 76, 77) and guidance (PPG Ref ID 37-015-20140306).</p> <p>Recommendation: No change</p>
Placket Lane should be the boundary for the South Yeovil SUE.	<p>This issue is not specifically relevant to the Main Modifications consultation. The location of the South Yeovil SUE was discussed and addressed through the Proposed Main Modifications and resumed Examination hearing sessions.</p> <p>Recommendation: No change</p>

Main Modification 11: Amendment to Policy SS3 to improve clarity on employment land delivery in Rural Centres and Rural Settlements

Five comments were received in response to MM11. None raised any main issues in relation to the improved clarity on the delivery of employment land in Rural Centres and Rural Settlements. A number of other issues were raised and these are briefly addressed below:

Issue - Employment land in Crewkerne	SSDC Response
Approach to Crewkerne is unclear and will allow growth that is inconsistent with the strategic approach set out in the Local Plan (Policies EP1 and HG1). MM11 should cross refer to Policy EP1.	<p>This issue is not specifically relevant to MM11.</p> <p>In any effect, the Local Plan, through Policy SS3, Policy SS5, Policy EP1, and Policy HG1 does provide the policy framework through which to make decisions on future growth in Crewkerne. Policy SS3 includes a footnote reference to its relationship with Policy EP1.</p> <p>Recommendation: No change</p>
It is unclear that the presumption in favour of sustainable development applies to Policy EP1.	<p>This issue is not specifically relevant to MM11.</p> <p>Paragraph 14 of the NPPF states that for decision taking the presumption in favour of sustainable development means "...approving development</p>

	<p>proposals that accord with the development plan without delay". Local Plan Policy SD1 reflects this guidance.</p> <p>As already adopted and saved Local Plan allocations forming part of the development plan, those allocations listed within Policy EP1 can come forward at any time.</p> <p>Recommendation: No change</p>
Issue - Employment allocation at Wincanton	SSDC Response
<p>It was agreed with the inspector, that the initial area of employment would be the two areas of land on each side of the Lawrence Hill Road, from the Long Close site to the Anchor Hill roundabout. The land specified was between Lawrence Hill and the A303, and between Lawrence Hill and the stream to the north, which would form the buffer between employment and existing residential.</p>	<p>This issue is not specifically relevant to MM11.</p> <p>The Inspector did not discuss the specific boundary or area of employment land within Wincanton. The proposed Direction of Growth set out in Policy PMT4 sets out the broad extent of the employment area. This will help facilitate the employment growth advocated in Policy SS3.</p> <p>Recommendation: No change</p>
<p>The employment land provision at Wincanton should be increased to 6 hectares.</p>	<p>This issue is not specifically relevant to MM11.</p> <p>Main Modification 4 (March 2014) sets out the justification and evidence for the amount of employment land in Wincanton. This was debated during the Examination Hearing Sessions in June 2014 and has not been raised again as a matter of soundness by the Inspector.</p> <p>Recommendation: No change</p>

Main Modification 12: Amendment to Policy SS5 to improve clarity on housing delivery in Crewkerne and Wincanton

Issue - Growth adjacent the Development Area at Crewkerne and Wincanton	SSDC Response
<p>The effect of this modification as currently worded is for a period of time, to allow unbounded growth around the Market Towns of Wincanton and Crewkerne which will include land of high environmental value. The failure to define (adequately or otherwise) a Strategic Direction for housing growth is at the heart of the issue.</p>	<p>The revision to Policy SS5 provides an NPPF compliant approach to dealing with planning applications for housing growth until such time as the Site Allocations DPD is adopted and/or there is an early review of growth proposals in Wincanton.</p> <p>Decisions on growth will be taken in light of the policy framework provided by SS5 and other policies within the Local Plan (e.g. SD1, SS1, HG1, etc). It is not correct to state that this growth will be unbounded as future planning proposals will need demonstrate they are commensurate with the scale of growth set out in SS5, will not have a significant negative impact on the role and function of the settlement, and can achieve sustainable development in line with the policy principles set out in the NPPF.</p> <p>In accordance with paragraph 14 of the NPPF where a proposal would result in any adverse impacts that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole it should be refused.</p> <p>Recommendation: No change</p>
Issue – Growth adjacent the Development Area - Crewkerne	SSDC Response
<p>The CLR Key Site (Policy HG1) is proposed to meet the housing need over the plan period, so promoting development that is outside of this area is inconsistent with the Local Plan policy for strategic growth proposed for this town.</p>	<p>Policy SS5 identifies an additional housing requirement of <u>at least</u> 45 dwellings in Crewkerne over the plan period. This is in addition to the saved CLR Key Site allocation (Policy HG1).</p> <p>As such, and to ensure compliance with the NPPF, it is appropriate that Policy SS5 (through MM12) allows for planning applications to be submitted and considered to meet the housing requirement in Crewkerne. This is not an inconsistent approach, nor should it result in over-development, as future application(s) will still need to be in accordance with the Local Plan, overcome any significant negative impacts, and meet</p>

	<p>the policy tests for sustainable development as set out in the NPPF.</p> <p>Recommendation: No change</p>
<p>The proposed approach moves the emphasis away from the delivery of the Key Site. Main Modification should be amended as follows:</p> <p>The same key considerations should also apply when considering housing proposals <u>in Crewkerne including the strategic housing site, Wincanton and (wherever located) adjacent to the development area at Crewkerne, Wincanton and the Rural Centres.</u></p>	<p>The Main Modification has been put forward to improve the clarity for how planning applications can be considered within Crewkerne to help realise the levels of growth set out in Policy SS5.</p> <p>The Local Plan, which should be read as a whole, has clear reference to Council's stated ambition to deliver the Crewkerne Key Site, especially through policies EP1 and HG1.</p> <p>Recommendation: No change</p>
<p>An additional sentence should be included in the supporting text to Policy SS5 or HG1 to confirm that the Council will work in collaboration with developers of the CLR Key Site to secure a deliverable scheme.</p>	<p>Paragraph 8.16 of the submitted Local Plan affirms the Council's commitment to supporting economic development and promoting the sites within Policy EP1. The same commitment to delivering Policy HG1 is stated in paragraph 9.8 it is therefore considered that the proposed amendment is unnecessary.</p> <p>Recommendation: No change</p>
Issue - Growth adjacent the Development Area - Wincanton	SSDC Response
<p>The wording should limit housing development to brownfield land within the existing town's development boundaries. Failure to define the limitations on housing provision would make the work on a sustainable policy pointless and contrary to the NPPF.</p>	<p>The approach set out in MM12 accords with that discussed with the Inspector at the Examination hearing sessions held in June 2014. The principle of development within the Development Area of Wincanton will continue to be supported but to limit growth to within that area alone would be contrary to the NPPF. As stated above development proposals will be considered in the context of the presumption in favour of sustainable development, overall scale of growth and wider policy framework set out in the Local Plan.</p> <p>Recommendation: No change</p>
<p>The text should be amended to confirm that the permissive approach to housing proposals extends to Wincanton.</p>	<p>The Main Modifications have been drafted to specifically ensure that the permissive approach applies in Wincanton.</p> <p>Recommendation: No change</p>

Issue - Early review at Wincanton	
<p>The proposed timeframe of commencement within two years and completion in five years for the early review of housing and employment policy at Wincanton is unjustifiably long.</p> <p>Suggested that commencement within one year and completion with 3 years might be appropriate.</p>	<p>On the matter of reviewing local plans, the NPPG states the following:</p> <p><i>“local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”</i> Paragraph: 008 Reference ID: 12-008-20140306</p>
<p>Concerned regarding the proposal to undertake the housing review as part of the Site Allocations DPD process. In the event that this review concludes that more homes and therefore sites are needed, there is insufficient time to include further sites to accommodate this need within the Site Allocations Document. This will result in further uncertainty and delay to housing provision within Wincanton.</p>	<p>The review of housing and employment policy at Wincanton is a potentially complex issue and is likely to give rise to further revisions of policy elsewhere within the Local Plan. A period of assimilation and monitoring is required in order to reflect on how the existing policy is translating into built development, and to ensure that there is a robust evidence base to underpin any future growth proposals.</p> <p>In the light of the advice in the NPPG it is accepted that to be considered genuinely ‘early’ the proposed review of the situation in Wincanton could be completed within a shorter timescale. It is therefore proposed that Policy SS5 and the proposed new paragraph after Section 13.5 of the Local Plan be amended to state a review will be completed within three years of the date of adoption of the Local Plan.</p> <p>Recommendation: Amend Policy SS5 and new paragraph after Section 13.5 of the Local Plan as follows: <u>The Council will undertake an early review of Local Plan policy relating to housing and employment provision in Wincanton. This will be in accordance with statutory requirements and be completed within three years of the date of adoption of the Local Plan.”</u></p>
Issue - Other	
<p>Redefinition of the current Strategic Direction of growth for Employment at Wincanton as mixed-use.</p>	<p>This issue was addressed during the Examination Hearing sessions of June 2014.</p>

<p>Please include a "Preferred area for housing growth" in the Wincanton element of the plan. The preferred area of housing growth should be the area adjacent New Barns Farm between Lawrence Hill and West Hill and the area between Common Road and Devonish Lane.</p>	<p>Wincanton has a high level of existing planning permissions for sites which are expected to be built out over the Local Plan period. The Main Modifications facilitate other planning applications being considered on their merits.</p> <p>The early review of housing and employment in Wincanton will provide the appropriate opportunity to examine monitoring data on housing and employment delivery, appraise the scale of future need, and identify locations for growth in Wincanton.</p> <p>Recommendation: No change.</p>
<p>Wincanton should have a 5 year moratorium from any large scale new housing following the allocation being front loaded in the first half of the plan period.</p>	<p>A moratorium would be contrary to Paragraph 14 of the NPPF. In practice, it would also be unachievable and unenforceable in light of the presumption in favour of sustainable development.</p> <p>Recommendation: No change</p>
<p>Policy SS5 is in direct conflict with national housing policy. No policy exists within the Main Modifications that complies with NPPF directives, NPPG interpretation, the Localism Act 2011 or any ministerial and central Government promotion encouraging individual Custom Build solutions to the housing shortage. As such there is no means of utilising any portion of the thirty million pounds grant subsidy that has been made available to those wishing to build their own accommodation.</p>	<p>This is not specifically relevant to MM12.</p> <p>The Local Plan does not prevent proposals for Custom Build housing solutions coming forward. Any Custom Build scheme will need to demonstrate that it represents sustainable development and is in accordance with national and local policy.</p> <p>The Homes and Communities Agency are responsible for the funding for Custom Build. Grant will be given to projects which meet their criteria.</p> <p>Recommendation: No change.</p>