



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

## **Sustainability Appraisal Addendum Report**

**March 2014**

*enfusion*



# South Somerset District Council Local Plan: Sustainability Appraisal Addendum Report

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## South Somerset District Council Local Plan: SA Addendum Report

### Contents

	<b>Page Numbers</b>
<b>1.0 Introduction</b>	<b>1</b>
Purpose of this SA Addendum Report	1
Background	1
Structure of this SA Addendum Report	3
<b>2.0 Soundness Issue 1: SA of Yeovil's Strategic Growth Options</b>	<b>5</b>
Introduction	5
Approach, Method and Summary Findings	5
Consultation	8
Revisions and Updates to SA	10
<b>3.0 Soundness Issue 2: Directions of Growth at Ilminster</b>	<b>11</b>
Introduction	11
Approach, Method and Summary Findings	11
Consultation	13
Revisions and Updates to SA	14
<b>4.0 SA of Proposed Main Modifications to the Local Plan</b>	<b>15</b>
Introduction	15
Policies YV1 and YV2	16
Policy YV6	17
Policy PMT3	18
Policy SS3 and SS5	18
Policy HG7	19
<b>5.0 Summary and Next Steps</b>	<b>20</b>
<b>Tables:</b>	
2.1 Further Planning Criteria to inform Decision-making	7
2.2 Summary of Responses to Consultation	8
3.1 Summary comparative appraisal of Options for Ilminster direction of growth	11
3.2 Summary of Responses to Consultation	14
<b>Figures:</b>	
1.1 Local Plan and SA/SEA Progress and Interrelationships	4
<b>APPENDICES</b>	
I Summary of Responses to Consultation	
II Revised SA of Ilminster Direction of Growth	
III SA Screening of Proposed Main Modifications to the Local Plan	
IV SA of Significant Changes	



## 1.0 Introduction

### Purpose of this SA Addendum Report

- 1.1 The purpose of this Addendum Report is to address the consultation representations received on the SA Reports that accompanied the Proposed Main Modifications (PMMs) on consultation from 28 November 2013 to 10 January 2014.
- 1.2 This Addendum Report provides more clarity with regard to the further SA work that has been carried out since Examination Hearing Sessions ended in June 2013 and the Inspector issued his Preliminary Findings letter in July 2013. It is important that this document is read in conjunction with the Yeovil Strategic Growth Options SA Report (Oct 2013) and Local Plan Proposed Modifications SA Report (Nov 2013). It more clearly sets out the SA screening of the PMMs to the Local Plan and any further work carried out to address significant changes.
- 1.3 This Addendum Report will be submitted alongside the PMMs for consideration by the Inspector through further Hearing Sessions in June 2014.

### Background

- 1.4 South Somerset District Council (SSDC) has been undertaking Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) since 2009 to inform the preparation of the South Somerset Local Plan. The progress of the Local Plan and SA and the iterative relationship between the two processes is illustrated later in this Section in Figure 1.1.
- 1.5 Following the public Hearing Sessions into the submitted South Somerset Local Plan during May and June 2013, the Inspector raised three significant issues of concern. These were set out within the Inspector's Preliminary Findings (July 2013) as follows:
  - **Soundness Issue 1: SA of Yeovil's Strategic Growth Options** - Concerns over the lack of weight attached to the need to seek areas of poorer 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 and that mitigation has not been sufficiently considered; lack of consistency regarding the consideration of the historic environment and biodiversity and geodiversity.
  - **Soundness Issue 2: Direction of Growth at Ilminster** - The proposed direction of growth was not considered sound by the Inspector when compared against reasonable alternatives as the Council acknowledged that there was an error in the SA of the options for directions of growth.
  - **Soundness Issue 3: Employment Policy SS3** - Following concerns raised at the Examination the Council reviewed its position regarding employment provision. The changes proposed by the Council were not considered sound by the Inspector as it was not consistent with Para 154 of the NPPF.

- 1.6 The Inspector agreed to a suspension of the Examination into the Local Plan so that the Council could address the issues outlined above. In August 2013 the Council commissioned Enfusion Ltd to provide specialist, independent services to undertake the additional SA work needed to address Soundness Issue 1 (SA of Yeovil's Strategic Growth Options). Enfusion initially undertook a Compliance Review of the SA work produced to date by the Council for the Yeovil Strategic Growth Options. The SA Compliance Review was completed in August 2013 and published on the Council's website in October 2013<sup>1</sup> and informed the subsequent SA work with regard to Soundness Issue 1.
- 1.7 After the SA Compliance Review (August 2013), the Council and Enfusion reconsidered realistic options for strategic growth in Yeovil, undertaking a fresh and independent appraisal of those reasonable alternatives identified. The findings of this work were presented in the Yeovil Strategic Growth Options SA Report (Oct 2013)<sup>2</sup>, which accompanied the Council's PMMs on public consultation from November 2013 to January 2014.
- 1.8 A revised appraisal of options for the direction of growth at Ilminster was carried out by the Council, with assistance provided by Enfusion, to address Soundness Issue 2. This work along with the screening of the PMMs was presented in the Local Plan Proposed Main Modifications SA Report (Nov 2013)<sup>3</sup>, which also accompanied the Council's Proposed Main Modifications (PMMs) on consultation from November 2013 to January 2014. The concerns raised by the Inspector with regard to Soundness Issue 3 are predominantly a matter for plan-making and therefore no significant further SA work was required to address them. Any changes to Policy SS3 were considered through the Local Plan Proposed Main Modifications SA Report (Nov 2013).
- 1.9 The Inspector's Preliminary Findings stated that there was no detailed explanation of how the SA objectives have been drawn up or their relationship to guidance on delivering sustainable development as contained within the NPPF. In order to address this, Section 2 of the Yeovil Strategic Growth Options SA Report (Oct 2013) provided a clear explanation of how the SA Objectives were developed and the relationship to guidance on delivering sustainable development in the NPPF by referring to where topics covered by each SA objective are discussed in the NPPF.
- 1.10 The independent SA Compliance Review (August 2013) recommended that the baseline information and plans, policies and programmes review (PPP review) should be updated to ensure that the evidence base for the ongoing SA work is current. This was undertaken by the Council in September 2013. A summary of this work was provided in Section 2 of the Local Plan

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<sup>1</sup> SSDC Website - LDF Project Management Board: Workshop 29 - Local Plan Suspension Programme (14 October 2013) Available online: <http://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/local-plan-2006-2028/local-plan-%28formerly-core-strategy%29-project-management-board-reports/pmb-14-october-2013/>

<sup>2</sup> SSDC Website - Yeovil Strategic Growth Options SA Report (Oct 2013) [http://consult.southsomerset.gov.uk/consult.ti/Proposed\\_Main\\_Mods/view?objectId=11177317](http://consult.southsomerset.gov.uk/consult.ti/Proposed_Main_Mods/view?objectId=11177317)

<sup>3</sup> SSDC Website - Local Plan Proposed Main Modifications SA Report (Nov 2013) [http://consult.southsomerset.gov.uk/consult.ti/Proposed\\_Main\\_Mods/view?objectId=11178181](http://consult.southsomerset.gov.uk/consult.ti/Proposed_Main_Mods/view?objectId=11178181)

Proposed Main Modifications SA Report (Nov 2013) with the detail provided in Appendices 1 and 2 of that Report.

- 1.11 The SA Compliance Review (August 2013) also recommended that the Non-Technical Summary (NTS) for the SA Report published in June 2012 be updated to include the findings of the further SA work being carried out. The updated NTS was published alongside the PMMs and SA Reports for public consultation in November 2013<sup>4</sup>.
- 1.12 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 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 and 2 and the proposed changes to the Local Plan.

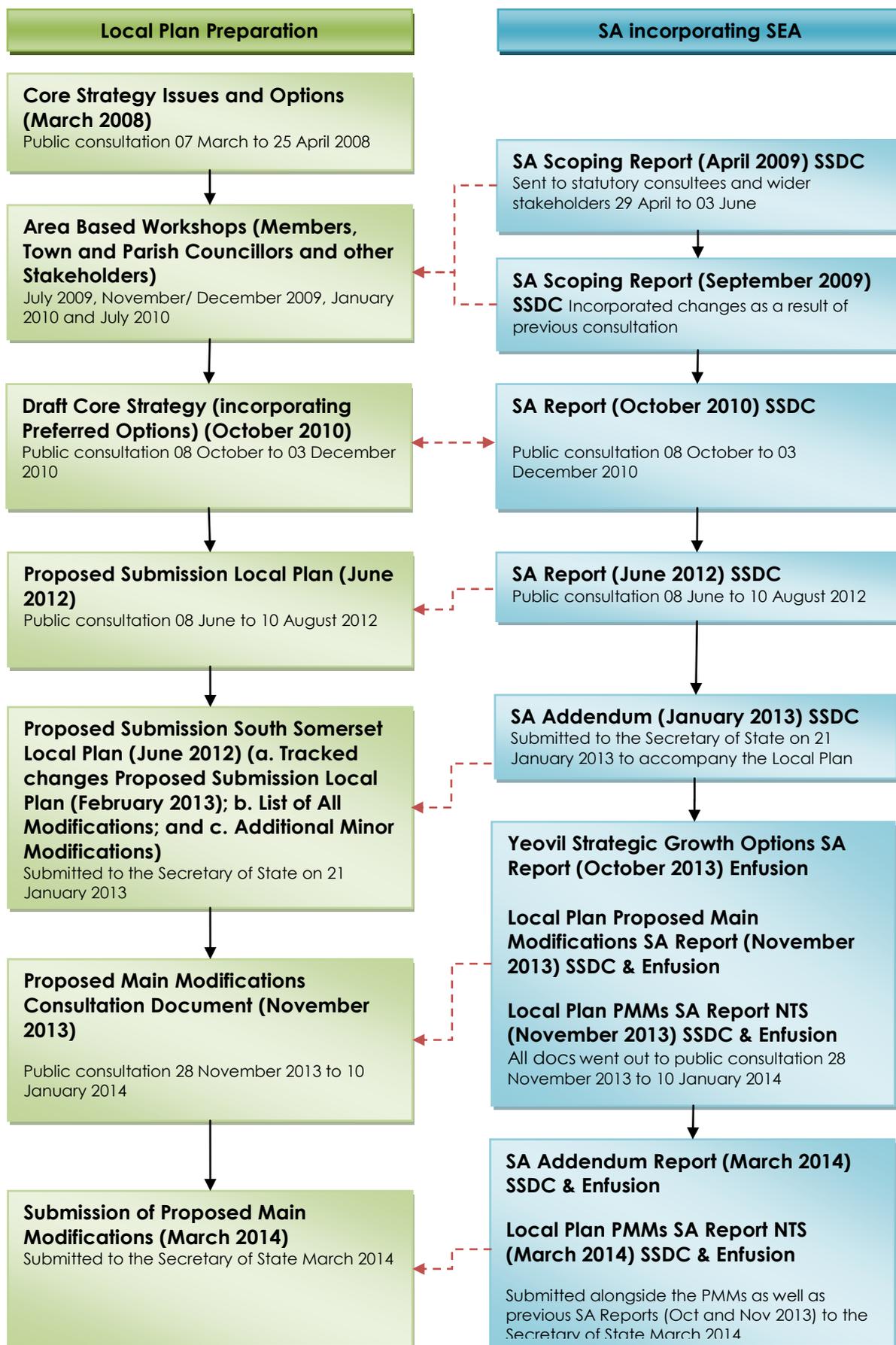
### **Structure of this SA Addendum Report**

- 1.13 Following this introductory Section, Sections 2 and 3 provide a summary of the further SA work that was undertaken to address Soundness Issues 1 and 2 as well as the representations received through the consultation that ended in January 2014 and any further SA work required. Section 4 provides a summary of the proposed changes to the Local Plan and the findings of the SA screening of the PMMs. Section 5 summarises the findings of the further SA work and sets out the next steps.

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<sup>4</sup> SSDC Website - Local Plan Proposed Main Modifications SA Report Non-Technical Summary (Nov 2013) [http://consult.southsomerset.gov.uk/consult.ti/Proposed\\_Main\\_Mods/view?objectId=4238772](http://consult.southsomerset.gov.uk/consult.ti/Proposed_Main_Mods/view?objectId=4238772)

Figure 1.1: Local Plan and SA/SEA Progress and Interrelationships



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

### Introduction

- 2.1 This Section should be read in conjunction with the Yeovil Strategic Growth Options SA Report (Oct 2013), as it provides a summary of the approach, method and findings for that Report as well as a summary of the consultation responses received and how they have been addressed.
- 2.2 The first Soundness Issue raised by the Inspector's Preliminary Findings related to the SA of the Strategic Growth Options for Yeovil. In particular, concerns were raised with regard to the following:
- The lack of weight attached to the need to seek to use areas of poorer quality agricultural land in preference to that of higher quality (bearing in mind that once lost such high quality land cannot be retrieved);
  - The lack of substantive evidence to demonstrate that there are significant differences in terms of landscape impact between several of the options that have been considered. Opportunities for mitigation, primarily through layout and design do not appear to have been sufficiently addressed;
  - Lack of consistency regarding the consideration of protecting and enhancing the historic environment; and
  - Lack of clarity regarding the scoring for objective 14 – conserving and enhancing biodiversity and geodiversity.
- 2.3 The Inspector acknowledged in his Preliminary Findings that there is little to differentiate between the four areas of search for development growth in Yeovil with regard to accessibility, reducing poverty/social exclusion, provision of housing, improving health, improving education and skills, reducing crime, supporting strong diverse local economy, traffic, climate change, and reducing flood risk. The Inspector requested more information and a comparative SA with particular consideration of the effects on landscape/townscape, the historic environment, agricultural land, and biodiversity and geodiversity.

### Approach, Method and Summary Findings

- 2.4 In August 2013 the Council commissioned Enfusion Ltd to provide specialist, independent services to undertake the additional SA work required by the Inspector with regard to Soundness Issue 1. Enfusion initially carried out an independent compliance review of the SA/SEA work completed by the Council to date with regard to Yeovil. This work was published in August 2013 and informed the subsequent SA work.
- 2.5 Following the review, the Council and Enfusion worked together to reconsider 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 Strategic Housing Land Availability Assessment (SHLAA), and other technical studies such as flood risk assessments to help confirm the strategic growth options that are realistic for fresh SA. 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, a more detailed landscape study<sup>5</sup> was undertaken by the Council and informed the refinement and choice of options to be subject to SA.

- 2.6 South Somerset District Council Proposed Submission Local Plan (June 2012) Policies SS5 and YV1 identify that the objectively assessed need for housing and associated infrastructure in a Yeovil sustainable urban extension is for an additional 1,565 dwellings over the lifetime of the Plan up to 2028. As these are strategic options for growth rather than site allocations (which will be proposed through a Site Allocations DPD) 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 can deliver the community benefits necessary to promote a more sustainable development. Based on other major developments in South Somerset since 2006, developments of less than 500 dwellings have not been required to make provision for a primary school or on-site formal playing fields and other community facilities.
- 2.7 The realistic strategic options that could accommodate 1,565 dwellings, either alone (single site option) or combined (multi-site option of 2-3 times approximately 500 dwellings) and avoiding constraints were identified as follows:
- **Area B Coker:** could potentially accommodate 1,565 dwellings at a density of 35-40 houses per hectare avoiding major constraints of landscape sensitivity, flood plains and heritage assets.
  - **Area C Middle Yeo Valley & Dorset Hillside:** could potentially accommodate 1,565 dwellings at a density of 35-40 houses per hectare avoiding major constraints of landscape sensitivity and flood plain.
  - **Area D Upper Mudford:** could potentially accommodate 1,565 dwellings at a density of 35-40 houses per hectare avoiding major constraint of landscape sensitivity.
  - **Multi-site Option:** considering approximately 1,565 houses from Search Area A in part (avoiding the major constraints of the Brympton D'Evercy listed house and park, as well as landscape sensitivity), Area B, Area C, and Area D.
- 2.8 The reasons why other areas were rejected as not being reasonable or realistic alternatives are provided in Section 3 of the Yeovil Strategic Growth Options SA Report (Oct 2013).
- 2.9 The four identified reasonable options for strategic growth in Yeovil were subject to independent SA by Enfusion using the SA Framework that has been used throughout the SA process, with the updated baseline, and using professional opinion where appropriate. The appraisal took into account the mitigation that is provided by various development management policies in the Local Plan. Assumptions and any uncertainties were reported as required by the SEA Directive. Where relevant, the SA made suggestions and recommendations for further studies and to mitigate negative effects or

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<sup>5</sup> Yeovil Peripheral Landscape Study Addendum August, 2013

promote enhancement possibilities at the next stage of planning – the preparation of masterplanning.

- 2.10 The Enfusion appraisal recognised five categories of potential significance of effects and recorded them with the same symbols and colours as had been used by the previous SA for the Yeovil options. These categories of significance were described in Table 3.2 of the Yeovil Growth Options SA Report (Oct 2013). The same SA Framework was used in order to provide continuity and consistency with the previous work.
- 2.11 Each of the four options was appraised separately and the detailed findings of each SA are presented in Appendix II of the Yeovil Strategic Growth Options SA Report (Oct 2013). A summary of the appraisal findings were set out in Chapter 3 of the Yeovil Strategic Growth Options SA Report (Oct 2013) along with a summary comparative appraisal table to help inform the decision-making for the Council.
- 2.12 The SA found that there were some key differentiators between the options; these relate to the historic environment, flooding and the loss of agricultural land. However, overall, the SA did not identify a clear preferred option, which is not unusual for a high level strategic assessment.
- 2.13 The Council therefore requested that Enfusion assist in the development of further planning criteria to help differentiate between the options and inform the decision-making process. These criteria are set out in Table 2.1 below.

**Table 2.1 Further Planning Criteria to inform Decision-making**

No	Criterion	Potential Reasoning & Examples
1	Deliverability and viability (housing & employment)	Certainly of delivery – ability to contribute to short and medium term housing need (takes in to account complexity; partnership arrangements of landowners; stage of advancement existing plans)
1a	Market Capacity	Consideration of market capacity constraints
1b	Infrastructure deliverability	Key infrastructure deliverability (reference to existing commitments & timings for road, cycle and walk ways improvements )
2	Provision of services & facilities	Ability of development to satisfy proven local / strategic need. Proximity to and ability to support sustainability of existing services
3	Further Mitigation potential	Landscape / Heritage/ Agricultural land (opportunities to mitigate some negative impacts; consideration of phasing; offsite possibilities; comparative effectiveness)
4	Added opportunities and benefits	Exceptional ability of development to contribute to proven need; to create key opportunity e.g. sports facility/ school/ access to employment site.
5	Ability to provide long term development (beyond Plan period)	To fulfill aspiration for a large self-sustainable community. Para 154 of the NPPF states that "Local Plans should be aspirational but realistic."

- 2.14 The further planning criteria were not a part of the SA process; they were a piece of further evidence that helped to inform the Council's decision-making and therefore support the plan-making process. In line with the NPPF, the further planning criteria focussed on deliverability and viability to try help to differentiate between the sites.
- 2.15 The updated evidence (including Yeovil Peripheral Landscape Study Addendum), fresh SA of options (Yeovil Strategic Growth Options SA Report Oct 2013) and further planning criteria all helped to inform the Council's decision to progress with two Sustainable Urban Extension locations to accommodate growth in Yeovil. This resulted in the subsequent changes to the Local Plan (Proposed Main Modifications 1 and 2<sup>6</sup>). The reasons for the selection and rejection of the four reasonable options were provided in Section 4 of the Yeovil Strategic Growth Options SA Report (Oct 2013), which accompanied the Proposed Main Modifications Consultation Document on public consultation from 28 November 2013 to 10 January 2014.

### Consultation

- 2.16 The Council received 26 representations relating to the Yeovil Strategic Growth Options SA Report and Appendices. The consultation responses received and how they have been taken into account through the SA process are provided in Appendix I. Table 2.2 below provides a summary of the key issues raised through the consultation and how they have been addressed through the SA process.

**Table 2.2: Summary of Responses to Consultation**

Key Issue	Enfusion response
All reasonable options have not been considered - suitable areas to the North of Yeovil have not been considered through the further SA work.	<p>As stated in Para 3.9 of the SA Report, "The EU SEA Directive<sup>7</sup> requires assessment of the likely significant effects of implementing the plan and "reasonable alternatives" taking into account "the objectives and geographical scope" of the plan; and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term "reasonable alternative"; however, UK SA/SEA guidance<sup>8</sup> advises that it should be taken to mean "realistic and relevant" i.e. deliverable and within the timescale of the plan".</p> <p>Paras 3.15 to 3.26 in the SA Report set out the method for identifying reasonable alternatives for strategic growth in Yeovil. The reasons why areas were rejected as not being reasonable for consideration through the fresh and independent SA are also provided in Paras 3.15 to 3.26. The SA states in Para 3.20 that, "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</p>

<sup>6</sup> Full Council Meeting, 13 March 2014: <https://www.southsomerset.gov.uk/councillors-and-democracy/meetings-and-decisions/agendas-and-minutes/agendas-and-minutes.aspx?yr=2014&mid=3172>

<sup>7</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>8</sup> <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

	moderate-low capacity to accommodate built development <sup>9</sup> ".
The further SA work does not address the Inspector's concerns.	The fresh and independent SA addresses the Inspector's concerns by providing a consistent comparative appraisal of reasonable options. The concerns raised by the Inspector with regard to agricultural land, the landscape, the historic environment and biodiversity and geodiversity have all been addressed.
The loss of agricultural land has still not been given sufficient weight.	The NPPF defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The evidence <sup>10</sup> shows that each of the reasonable options contains best and most versatile agricultural land. In recognition of the evidence and the Inspector's comments the SA distinguished between the grades and states in Para 3.32 of the Yeovil Strategic Growth Options SA Report (Oct 2013) that development within option area B, "would lead to a significant loss of the highest grade agricultural land, which has the potential for permanent significant long-term negative effect on this SA Objective. Compared to the other options, this option has the potential for the greatest loss of the highest grade of agricultural land". The loss of Grade I agricultural land was one of the factors that led to the Council deciding to reduce the level of development proposed in this option area.
Insufficient weight given to impacts on the historic environment for Area B.	The SA was informed by the Historic Environment Assessment of Yeovil Periphery (July 2010) as well as the Yeovil Peripheral Landscape Study Addendum (Aug 2013), the latter of which considers designated heritage. The appraisal also identifies and considers the effect of development on important designated heritage within close proximity to the option areas. The appraisal of Option Area B took into account previous responses from English Heritage related to proposed development in that area. The SA found that development at Area B has the potential for a significant medium to long-term negative effect on SA Objective 10 (historic environment). It concludes that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects. In line with English Heritage comments the SA also recommends that any proposal for development in this area should seek opportunities to enhance the setting of the Roman Villa (Dunnock's Lane) and achieve gains through placing interpretation and encouraging community involvement in the management of the Scheduled Monument.
Insufficient weight given to impacts on landscape for Area B.	The SA was informed by the Yeovil Peripheral Landscape Study Addendum (Aug 2013), which found that development in this area could have significant landscape and visual effects. The Addendum considered the capacity of all the option areas to accommodate development during the life of the plan and beyond and proposed mitigation measures to address

<sup>9</sup> Yeovil Peripheral Landscape Study 2008; and Addendum 2013

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

	significant negative effects.
The multi-site option should not be limited to 2 sites.	The representation mainly relates to the minimum threshold for 500 dwellings. The reasons why a minimum threshold of 500 dwellings was set for strategic options for the direction of growth are provided in Para 3.22 of the Yeovil Strategic Growth Options SA Report (Oct 2013). It states in Para 3.22 that, "This was considered to be the minimum size of development that can deliver the community benefits necessary to promote a more sustainable development. Based on other major developments in South Somerset since 2006, developments of less than 500 dwellings have not been required to make provision for a primary school or on-site formal playing fields and other community facilities". The reasons for the selection/ rejection of options in plan-making are presented in Table 4.1 in the Yeovil Strategic Growth Options SA Report (Oct 2013).
Alternative 'scoring' was submitted by consultees for a number of the option areas.	It is considered that the alternative appraisals submitted are not independent and not justified when considered against available evidence.
The link between the SA and the additional decision-making criteria is not clear. The purpose and relationship between the two SA Addendum Reports is not clear.	It is agreed that this could be made clearer. Section 2 of this SA Addendum Report provides a clearer explanation of how the additional decision-making criteria relate to the SA and plan-making processes. The purpose and relationship between the two SA Reports has been more clearly explained in Section 1 of this SA Addendum Report.
There has been no consideration of the potential effects of the Preferred Option, two urban extensions at Areas B and D.	The SA Screening of the PMMs is now more clearly presented in Section 4 and Appendix III of this SA Addendum Report. A re-appraisal of Policy YV2 is provided in Appendix IV.

### Revisions and Updates to SA

- 2.17 It is considered that the majority of representations do not require any further action through the SA process as the Yeovil Strategic Growth Options SA Report (Oct 2013) 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 is agreed that some further work is required to provide further clarity and address representations relating to the potential effects of the Proposed Modifications. This SA Addendum Report provides further narrative as well as clearly setting out the findings of the SA screening for the proposed changes to the Local Plan (PMMs 1 and 2) in Chapter 5.

### 3.0 Soundness Issue 2: Directions of Growth at Ilminster

#### Introduction

- 3.1 This Section should be read in conjunction with the Local Plan Proposed Main Modifications SA Report (Nov 2013), as it provides a summary of the approach, method and findings for the revised SA of the directions of growth for Ilminster as well as a summary of the consultation responses received and how they have been addressed.
- 3.2 The second Soundness Issue raised by the Inspector's Preliminary Findings related to the SA of the directions of growth for Ilminster. The proposed direction of growth was not considered sound by the Inspector when compared against reasonable alternatives as the Council acknowledged that there was an error in the SA of the options for the directions of growth.

#### Approach, Method and Summary Findings

- 3.3 Following the hearing sessions and the Inspector's Preliminary Findings, the Council reviewed the SA of options for the Ilminster direction of growth and revised as appropriate, using the same methodology and SA Framework as used throughout the process<sup>11</sup> and updated baseline information. Independent consultants Enfusion provided quality assurance and advice on the revised draft appraisals produced by the Council.
- 3.4 The findings of the revised SA are presented below in Table 3.1.

**Table 3.1: 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. This difficulty clearly needs to be given considerable and special weight in any comparison.

<sup>11</sup> Sections 3 and 4 of the SA Report (June 2012).

Sustainability Objective	Strategic Options			Summary Comparative Appraisal
	Option 1 (Shudrick Valley)	Option 2 (Canal Way)	Option 3 (North)	
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 Canal Way given its centrality to the first 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	--	0	-	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.

Sustainability Objective	Strategic Options			Summary Comparative Appraisal
	Option 1 (Shudrick Valley)	Option 2 (Canal Way)	Option 3 (North)	
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.

3.5 The SA found that there were some key differentiators between the options; these relate to the provision of housing, landscape, historic environment, and the loss of agricultural land. For consistency, the Council used the same further planning criteria to inform the decision-making process as was used to inform the decision on the preferred option for strategic growth in Yeovil. The further planning criteria are set out in Section 2, Table 2.1.

3.6 The revised SA of options (Local Plan Proposed Main Modifications SA Report Oct 2013) and further planning criteria all helped to inform the Council's decision to progress Option 2 (Canal Way) and therefore the subsequent changes to the Local Plan (Proposed Main Modifications 3<sup>12</sup>). The reasons for the selection and rejection of the three options were provided in Section 3 of the Local Plan Proposed Main Modifications SA Report (Oct 2013), which accompanied the Proposed Main Modifications Consultation Document on public consultation from 28 November 2013 to 10 January 2014.

### Consultation

3.7 The Council received 11 representations relating to the Local Plan Proposed Main Modifications SA Report and Appendices. The consultation representations received and how they have been taken into account through the SA process are provided in Appendix I. Table 3.2 below provides a summary of the key issues raised through the consultation and how they have been addressed through the SA process.

<sup>12</sup> Full Council Meeting, 13 March 2014: <https://www.southsomerset.gov.uk/councillors-and-democracy/meetings-and-decisions/agendas-and-minutes/agendas-and-minutes.aspx?yr=2014&mid=3172>

**Table 3.2: Summary of Responses to Consultation**

Key Issue	South Somerset District Council Response
Objective 4 – “Improve Health and Well Being” – the proximity of Canal Way to the new medical centre results in a more positive scoring, this is queried, and the positive health benefits of Shudrick Valley are not fully articulated.	Having re-considered the distances to the Medical Centre, and the other health facilities in the town centre, it is not considered that there is a significant difference between Shudrick Valley and Canal Way. Therefore it is proposed to amend the Canal Way scoring to “+ / -“. All other scores for this Objective remain the same.
Objective 8 – question the Shudrick Valley need to deliver a new access route through town.	Discussions with Somerset County Council have questioned the need for Shudrick Valley to deliver an alternative route through the town. It is felt that the scoring approach to this Objective has not been consistent. Therefore it is proposed to amend the Shudrick Valley scoring to “+ / -“. All other scores for this Objective remain the same.
Objective 10 - scoring fails to take into account that Canal Way contains medieval Deer Park and Stone Age and Roman remains Canal Way abuts the only surviving part of the Chard to Ilminster canal, development could impact upon this. “The Stop Way Line” is located along Canal Way option.	Discussions with historic environment specialists at Somerset County Council and South Somerset District Council have highlighted that the approach to assessment of impacts on historic environment is not consistent across all three Options. It is felt that there is sufficient uncertainty about the impact of Option 2 on the historic environment that it cannot be deemed to have a “Neutral effect”. Therefore, it is proposed to amend the Option 2 scoring to “-“. All other scores for this Objective remain the same.

### Revisions and Updates to SA

- 3.8 As a result of the consultation responses and updated evidence (including further historic environment evidence produced by SSSDC), the revised SA of the directions of growth for Ilminster has been updated to reflect the changes set out in Table 3.2 above. The updated appraisals are presented in Appendix II of this Addendum Report. The Council determined that the updated appraisals did not affect the decision to progress Option 2 (Canal Way) as the preferred direction for strategic growth at Ilminster; therefore, reasons for the selection and rejection of the three options provided in Section 3 of the Local Plan Proposed Main Modifications SA Report (Oct 2013) are therefore still valid.

## 4.0 SA of Proposed Main Modifications to the Local Plan

### Introduction

- 4.1 The Proposed Submission Local Plan was submitted to the Planning Inspectorate on 21 January 2013. As part of the Independent Examination of the Local Plan, a number of Hearing Sessions were held between 07 May and the 18 June 2013. Based upon the conclusions reached during these Hearing Sessions and consideration of the evidence base to support the Local Plan, the Inspector issued a Preliminary Findings letter on 03 July 2013.
- 4.2 The Inspector's Preliminary Findings identified six issues of concern - three significant issues of concern relating to soundness, and three points of clarification. The Inspector concluded that further comprehensive work was required in order to enable the Local Plan to be found sound. Based upon these findings the Council requested a six-month suspension to the Independent Examination on 15 July 2013 in order to rectify the issues raised.
- 4.3 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<sup>13</sup>. 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.
- 4.4 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.
- 4.5 A screening table was produced to consider all the Main Modifications proposed by the Council, which includes proposed changes to Policy as well as supporting text. The summary of the findings of this work are presented below with the detail provided in Appendix III of this Addendum Report.
- 4.6 It should be noted that a number of Minor Modifications have also been proposed by the Council<sup>14</sup>, which mainly relate to minor changes in text to provide further clarification. These changes are not considered to significantly affect the findings of the SA and are therefore not included in the detailed screening table presented in Appendix III.

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<sup>13</sup> <http://www.southsomerset.gov.uk/pmb30>

<sup>14</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/>

## Policies YV1 and YV2

- 4.7 The key modifications proposed for Policies YV1 and YV2 include the removal of the housing requirement for Yeovil post plan period and the introduction of two sustainable urban extensions as opposed to one. The reasons and justification for these changes are set out by the Council in the Proposed Main Modifications Consultation Document (March 2014)<sup>15</sup>.
- 4.8 It is important to note that the overall number of dwellings proposed in Yeovil and for the District during the life of the plan has not changed. The screening found that the removal of development proposed post 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, it was considered that this would not change the nature or significance of the effects identified for Policies YV1 and YV2 during the life of the plan, as the number of dwellings to be delivered during the life of the plan has not changed. It was therefore concluded that the removal of the housing requirement post plan period would not significantly affect the findings of the appraisals for Policies YV1 and YV2 in Appendix 7 of the Local Plan SA Report (June 2012).
- 4.9 The other key modification to the policies relate to the change from a single to a two site urban extension. This is predominantly an issue for Policy YV2 as it specifically relates to the urban extension and proposes the directions for strategic growth in Yeovil. The change from a single to a two site urban extension is a main modification with potential significant effects; therefore, the appraisal of Policy YV2 has been revised to ensure that the likely significant effects of the two urban extensions have been considered. A summary of the revised appraisal is provided below with the detail presented in Appendix IV.
- 4.10 The revised appraisal found that Policy YV2 still has the potential for long-term significant positive effects on SA Objectives relating to housing and the economy through the provision of 1,565 dwellings and over 5ha of employment land during the life of the Plan. This will help to meet the objectively assessed need of the town. There is also still the potential for minor long-term positive effects on access to services and facilities and health through the provision of a primary school, health centre and neighbourhood centre to the south as well as the north east of Yeovil.
- 4.11 There is the potential for proposed development to have significant negative effects on the landscape and the historic environment; however, it is considered that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects. Proposed development will lead to the permanent loss of best and most versatile agricultural land with significant long-term negative effects against SA Objective 12. There is uncertainty with regard to the effects of proposed development on the historic environment

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<sup>15</sup> Full Council Meeting, 13 March 2014: <https://www.southsomerset.gov.uk/councillors-and-democracy/meetings-and-decisions/agendas-and-minutes/agendas-and-minutes.aspx?yr=2014&mid=3172>

and biodiversity until project level surveys have been carried out. However, it is considered that there is likely to be suitable mitigation available at the project level to address significant effects.

- 4.12 Further traffic modelling work commissioned by the Council has shown that background traffic growth to 2026 is the main contributor to minor deterioration of highway network performance, rather than the specific impacts of the proposed development sites<sup>16</sup>. The impacts on the highway network were considered less significant where the development is spread over two sites as the impact is diluted. The revised appraisal found that proposed development has the potential to exacerbate current congestion issues within the existing road network by contributing to background traffic growth, with the potential for a significant long-term negative effect unless appropriate mitigation is provided. It was concluded that policy mitigation contained in the Local Plan along with potential mitigation available at the project level, will mitigate the potential significant negative effect on transport as a result of development in this option area. This would result in residual minor long-term negative effects on traffic.

### **Policy YV6**

- 4.13 The key changes proposed for Policy YV6 include a reduction in the percentage of travel originating from the Yeovil Urban Extensions by non-car modes as well as the deletion of a number of provisions that proposed development would be expected to deliver in order to encourage non-car modes. The reduced percentage is based on further evidence which indicates that the level of proposed development is unlikely to achieve 50% of travel originating from non-car modes<sup>17</sup>. The reasons and justification for these changes are set out by the Council in the Proposed Main Modifications Consultation Document (March 2014)<sup>18</sup>.
- 4.14 The policy now seeks at least 30% of travel originating from the Yeovil Sustainable Urban Extensions by non-car modes as well as a number of measures to help deliver this including intrinsically linked well-designed infrastructure for footpaths and cycle ways; priority for electric, low emission and shared vehicles; traffic-free immediate environment and contributions to a Quality Bus Partnership. While the proposed changes might reduce the positive effects of Policy YV6 identified against SA Objectives relating to access to services/facilities, poverty and social exclusion and traffic, it is still considered likely that the policy has the potential for significant long-term positive effects. The screening concluded that the proposed modifications to this policy do not significantly affect the findings of the appraisal of Policy YV6 in Appendix 7 of the Local Plan SA Report (June 2012).

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<sup>16</sup> South Somerset District Council (February 2014) Yeovil Sustainable Urban Extension - Traffic Modelling Non-Technical Forecasting Addendum Report 3.

<sup>17</sup> South Somerset District Council (February 2014) Yeovil Sustainable Urban Extension - Traffic Modelling Non-Technical Forecasting Addendum Report 3.

<sup>18</sup> Full Council Meeting, 13 March 2014: <https://www.southsomerset.gov.uk/councillors-and-democracy/meetings-and-decisions/agendas-and-minutes/agendas-and-minutes.aspx?yr=2014&mid=3172>

### **Policy PMT3**

- 4.15 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 reasons and justification for these changes are set out by the Council in the Proposed Main Modifications Consultation Document (March 2014)<sup>19</sup>. 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 is provided in Appendix II of this Addendum Report.

### **Policy SS3 and SS5**

- 4.16 The key modifications relate to changes to the amount of employment land proposed for some of the settlements. There has also been a slight increase in the amount of land to be provided for economic development. The changes are likely to enhance the already positive economic effects of the policies (SA Objectives 1, 2 and 7), whilst still supporting the balanced link between jobs and homes by ensuring sufficient land is available to support the number of 'B use' jobs projected for each settlement from 2006-2028 (SA Objective 3).
- 4.17 Additional employment land in some settlements, particularly in Ansford / Castle Cary and Somerton, could have negative effects through increased traffic growth and pollution which may be more significant in the revised policy (SA Objectives 8 and 12); however, these would be counter balanced with increasing self containment and reducing the need to travel through mitigation in the form of sustainable travel measures (SA Objective 11). The Directions of Growth are considered sufficiently large to accommodate the increased employment land requirement in both these settlements, and the sustainability effects will be further considered when more precise locations for development are proposed through the Allocations DPD within these Directions of Growth. It is therefore considered that the modifications have no significant effect (compared to those previously set out) on the remaining SA Objectives for settlements where the requirement has increased.
- 4.18 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.

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<sup>19</sup> Full Council Meeting, 13 March 2014: <https://www.southsomerset.gov.uk/councillors-and-democracy/meetings-and-decisions/agendas-and-minutes/agendas-and-minutes.aspx?yr=2014&mid=3172>

- 4.19 The policies also now advocate a 'permissive' approach, subject to addressing other key policies, to employment and housing development in the directions of growth in advance of the Site Allocations DPD. This has not changed the substance of the policies, but is intended to clarify the delivery of employment and housing land ahead of allocating sites. The need to consider an appropriate scale of growth and the NPPF and other Local Plan policies, means that appropriate policy measures remain in place to ensure the impacts of new employment land and housing development are fully considered and addressed, particularly regarding the overall scale of growth. The modifications could potentially deliver more employment and housing land and promote economic growth in the short-term, but significant positive effects are already predicted for these SA Objectives. The uncertain and negative effects already identified in relation to impacts on the environment are likely to be the same given the overall scale of growth has not changed.
- 4.20 The screening concluded that the modifications do not significantly affect the findings of the appraisal of Policies SS3 and SS5 in Appendix 7 of the Local Plan SA Report (June 2012). The sustainability effects of employment land will be further considered when more precise locations for development are proposed for each settlement through the Site Allocations DPD.

#### **Policy HG7**

- 4.21 The number of Gypsy and Traveller sites to be delivered in the District has now been inserted into the policy as a result of an update to the Gypsy and Traveller Needs Assessment (Sept 2013)<sup>20</sup>. The addition of targets within the Policy reflecting identified need should lead to enhanced positive effects by providing more certainty for the travelling and settled communities alike, specifically in relation to SA Objective 3. The other sustainability effects remain as previously identified for Policy HG7 within Appendix 7 of the Local Plan SA Report (June 2012).

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<sup>20</sup> Gypsy and Traveller Needs Assessment Update Somerset Local Planning Authorities, 2013 (GTAA Update):  
[https://www.southsomerset.gov.uk/media/596737/item\\_4c\\_gypsy\\_and\\_traveller\\_needs\\_assessment\\_for\\_web.pdf](https://www.southsomerset.gov.uk/media/596737/item_4c_gypsy_and_traveller_needs_assessment_for_web.pdf)

## 5.0 Summary and Next Steps

- 5.1 This Addendum Report addresses the consultation responses received on the Yeovil Strategic Growth Options SA Report (Oct 2013) and Local Plan Proposed Main Modifications SA Report (Nov 2013) and more clearly sets out the screening of the Proposed Main Modifications.
- 5.2 The majority of representations on the Yeovil Strategic Growth Options SA Report (Oct 2013) do not require any further action through the SA process, as the work addresses the Inspector's concerns in relation to Soundness Issue 1. Certain responses requested more clarity in relation to the further SA work as well as the potential effects of the Proposed Main Modifications. This SA Addendum Report provides that further narrative and clarity.
- 5.3 As a result of the consultation responses and updated evidence the revised SA of the directions of growth for Ilminster were updated. The Council determined that the updated appraisals did not affect the decision to progress Option 2 (Canal Way) as the preferred direction for growth at Ilminster. Therefore, reasons for the selection and rejection of the three options provided in Section 3 of the Local Plan Proposed Main Modifications SA Report (Oct 2013) remain valid.
- 5.4 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.
- 5.5 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.
- 5.6 This SA Addendum Report will accompany the Local Plan Proposed Main Modifications SA Report (Nov 2013) and Local Plan Proposed Main Modifications SA Report Non-Technical Summary (March 2014) for submission alongside the Proposed Main Modifications to the Planning Inspectorate on 18 March 2014. The further evidence work, which includes the further SA work, and Main Modifications proposed by the Council will then be considered by the Inspector when the Examination and Hearing Sessions resume in June 2014. Any further significant changes to the Local Plan that arise as a result of the hearing sessions in June 2014 should be screened through the SA process.