The Planning Inspectorate

Report to South Somerset District Council

by David Hogger BA MA MRTPI MCIHT

an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE SOUTH SOMERSET

LOCAL PLAN 2006 - 2028

Document submitted for examination on 21 January 2013

Examination hearings held between 7 May and 23 May 2013; on 18 June 2013 and between 10 June and 13 June 2014

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Abbreviations Used in this Report

ABI	Annual Business Inquiry
AMR	Authority Monitoring Report
AONB	Area of Outstanding Natural Beauty
APS	Annual Population Survey
BR	Baker Report
BRES	Business Register and Employment Survey
CD	Core Document *
DPD	Development Plan Document
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
MoD	Ministry of Defence
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SoCG	Statement of Common Ground
SUE	Sustainable Urban Extension
SZ	Sports Zone

* To be found in the Council's Evidence Base

For the avoidance of doubt I describe the hearings held between 7 and 23 May and on 18 June 2013 as the *initial hearings*. The hearings between 10 and 13 June 2014 are referred to as the *resumed* hearings.

Non-Technical Summary

This report concludes that the South Somerset Local Plan provides an appropriate basis for the planning of the District over the next 14 years providing a number of modifications are made to the Plan. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. All the modifications were proposed by the LPA, and I have recommended their inclusion after full consideration of the representations from other parties on the issues raised.

The modifications are summarised as follows:

- The replacement of a single Sustainable Urban Extension (SUE) to the south and west of Yeovil by two SUEs – approximately 800 dwellings to the south and approximately 765 dwellings to the north east of the town; and overall updated housing figures;
- The inclusion of a requirement relating to the provision of structural planting at the NE Yeovil SUE;
- Changes to the sustainable transport objectives in policy YV6 in order to reflect the most appropriate strategy to follow;
- The identification of the direction of growth at Ilminster to the south west of the town (rather than to the south east);
- Clarification with regard to the employment land provision proposed for Wincanton, the local market towns, rural centres and rural settlements;
- Clarification with regard to a permissive approach towards housing delivery (including in Crewkerne and Wincanton) and employment delivery;
- Confirmation of an early review regarding housing and employment provision in Wincanton;
- Up-dating the Council's approach to gypsies and travellers; and
- The deletion of the East Coker and North Coker Buffer Zone.

Introduction

1. This report contains my assessment of the South Somerset Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF), in paragraph 182, makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The basis for my examination is the Proposed Submission Local Plan (June 2012).

3. There has been over a year since the Examination commenced but it would not be reasonable to expect the Council to have reacted over that time to every nuance in terms of up-dates to the evidence base. If that approach was to have been adopted there is the risk that the cycle would be never-ending and that there would be further delay to the conclusion of the Examination process. I have therefore taken a pragmatic approach and based my conclusions primarily, but not exclusively, on the evidence submitted with the Local Plan (LP) in 2013. I accept that the NPPF advises that plans should be based on up-to-date evidence but prior to the resumption of the hearings in June 2014 the Council confirmed that in its view there had been no substantive change to the evidence base since the first hearing sessions were held in 2013 and I am satisfied that there have been no changes of such significance that would threaten the soundness of the LP. Even if that was not the case the NPPF also makes it clear that a plan can be reviewed in whole or in part to respond flexibly to changing circumstances[1]. To that end it should be recorded that the Council is proposing a six-monthly cycle of monitoring[2] and a review of the LP in part within three years, so the mechanisms are in place to ensure that any significant change in circumstances can be acted upon as appropriate.

4. Following the initial hearing sessions in May and June 2013, I wrote to the Council on 3rd July 2013 identifying a number of significant concerns regarding the soundness of the submission LP (2012)[3]. In summary these primarily related to the Sustainability Appraisal (SA) with regard to the Yeovil Sustainable Urban Extension; the direction of growth at Ilminster and the delivery of new employment land. In my letter I referred to three options – the withdrawal of the plan; the suspension of the Examination to enable further work to be undertaken; and the completion of my Report but with the risk that in that scenario the local plan may not be found sound.

5. The Council decided to request that the Examination be suspended for 6 months in order that further work, including in relation to the SA, could be undertaken. A very detailed work programme was drawn up which

[1] Paragraph 153
[2] Minutes of the District Executive on 06.02.14
[3] Inspector's Preliminary Findings

demonstrated the Council's commitment to following an agreed timetable and which provided the appropriate assurance that a suspension of the Examination could be justified. That additional work was completed and following public consultation the Council proposed main modifications (MM) to the LP. These MMs, which were subject to SA and public consultation, formed the basis for the resumed hearing sessions in June 2014 and the debate at those sessions led to four additional MMs being proposed which were also subject to SA and public consultation in August/October 2014. I have taken all the consultation responses and the up-dated sustainability evidence into account in writing this report.

6. This report deals with all the MMs that are needed to make the LP sound and legally compliant and they are identified in bold (**MM**). In the interests of consistency I have used the same reference numbers as the Council. In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted and these MMs are set out in the Appendix.

Public Consultation

7. Concern was expressed regarding the public consultation that was undertaken by the Council, particularly but not exclusively in Ilminster. Although I understand the criticisms that have been made, I am satisfied that the requirements of the Statement of Community Involvement have been met.

Assessment of Duty to Co-operate

8. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A of the 2004 Act in relation to the Plan's preparation. It is a requirement that the Council engages constructively, actively and on an on-going basis with neighbouring local planning authorities, the County Council and a range of other organisations.

9. The Council submitted a Duty to Co-operate Report[4] that satisfactorily demonstrates that there has been constructive engagement between the relevant parties. However, following concerns raised at the initial hearing sessions the Report was amended to more accurately reflect the requirement that co-operation should be an on-going activity[5]. Also a Duty to Co-operate Memorandum of Understanding was submitted[6] which confirms that there will continue to be co-operation between the Council and neighbouring local planning authorities. Overall I conclude that the evidence demonstrates that the duty to co-operate has been met.

[4] CD10
[5] Mid Hearing Document SSDC H002
[6] H055

Assessment of Soundness

Preamble

10. An order to revoke the Regional Strategy for the South West came into force on 20 May 2013 and it is therefore not part of the statutory Development Plan, although I have had regard to the evidence that supported it where relevant.

Main Issues

11. Taking into account all the representations, written evidence and the discussions that took place at the examination hearings, as well as the site visits that I undertook, I have identified 13 main issues upon which the soundness of the Plan depends.

Issue 1 – The Sustainability Appraisal with Regard to Yeovil and Ilminster

The Sustainability Appraisal (SA)

12. The SA process commenced in 2007 and has been undertaken for each stage of the plan preparation process. The final iteration of the SA, prior to the initial hearings, was published in June 2012. It is on the conclusions of this SA that the policies and proposals in the submitted LP are based. As referred to in paragraph 5 above, further sustainability work was undertaken by the Council in order to overcome some of my initial concerns.

13. In general terms the Council had adopted a comprehensive approach to the SA prior to the submission of the Local Plan (LP) but there were a number of areas where the scoring for certain issues lacked sufficient justification; where the requirements of the NPPF were not adequately embraced; and where there were factual errors in the documentation. This is particularly the case in relation to the Yeovil Sustainable Urban Extension and Ilminster. My Preliminary findings set out in detail my concerns but they can be summarised as:

- 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 SA objective 14 – conserving and enhancing biodiversity and geodiversity.

14. Following the consideration of my Preliminary Findings the Council commissioned an independent company to undertake a compliance review of

the sustainability work that had been carried out[7]. This review included recommendations to improve the process (section 3.2), up-date information and clarify the Council's approach. Further detailed documentation was prepared to strengthen the Council's evidence base on sustainability[8] and this consequently resulted in the change to the Council's approach to development in Yeovil and Ilminster, which I consider in the paragraphs below.

15. The up-dated evidence is comprehensive, proportionate and robust. It addresses my earlier concerns and provides the Council with the appropriate level of detail on which to base the LP.

Yeovil SA

16. The consideration of potential sites for development around Yeovil has been long and thorough. Initially a 360 degree area of search was undertaken which identified 11 broad areas[9] and this was refined to 6 separate geographic areas[10]. This in turn led to the identification of three options[11]. Initially it was proposed that the urban extension would accommodate 5,000 dwellings to reflect the draft Regional Strategy. In light of the proposed revocation of Regional Strategies[12] the Council consulted on proposals for an urban extension of 3,700 dwellings[13]. Following consideration of the consultation responses to the 'preferred options' version of the LP, this was reduced to 2,500 dwellings (plus associated development). Finally, as a consequence of the reduced scale of the extension, the Council considered three additional options[14]. The submission LP, in policy YV2, identifies a single site for a 2,500 dwelling sustainable urban extension (SUE) to the south and west of the town.

17. Following consideration of my Preliminary Findings the Council reconsidered the evidence and identified 6 potential directions of growth around the town[15], four of which were progressed and appraised. Following the appraisal it was concluded that reduced levels of development on parts of Area B (Coker) and Area D (Upper Mudford) would be sustainable. Table 4.1 of CD 161b provides a reasonable summary of the reasons for selecting these areas and for rejecting the other options considered. The up-dated SA with regard to Yeovil has been adequately justified by the Council and provides a firm foundation on which decisions about the future growth of the town can be based. Throughout the process there has been engagement with local communities in the consideration of sustainability requirements.

18. It was suggested by a number of representors that the Council should have placed greater weight on dispersing the proposed growth around the periphery of the town, in what was described as a necklace. A multi-site option was considered by the Council but I agree with the conclusions that such an approach would not offer the same economies of scale associated with one or

[7] CD 161a
[8] CD 161b, CD161c, CD161d and CD161e
[9] CD 16e
[10] See figure 5.5 in CD 16a
[11] See figure 5.6 in CD 16a
[12] CD 6
[13] CD 1
[14] See figure 5.7 in CD 16a
[15] CD 161b (page 13)

two larger sites; would not enable the provision of appropriate facilities and services; would not significantly reduce the need to travel; and cumulatively may have undesirable impacts on the character of the landscape and on a number of historic assets.

Ilminster SA

19. Initially the Canal Way site was the Council's preferred direction of growth for the town but this was changed to the area described as Shudrick Valley following a review of the SA. However, at the hearing sessions in 2013 it was confirmed by the Council that the SA in relation to Ilminster was not robust and I agreed with its conclusion that on the evidence available the Direction of Growth at Shudrick Valley was not the most sustainable option. The Council consequently re-assessed its SA for the three potential development options for the town. The review was quality assured by independent consultants.

20. It is recognised by the Council that there is little to differentiate between the sites at Canal Way and Shudrick Valley. However, the Canal Way option has no significant negative impacts, whereas the Shudrick Valley option has disadvantages in terms of the loss of high quality agricultural land and the effect that development would have on the landscape and the historic environment. I consider that the most damaging of these impacts would be on the landscape of this part of the valley, which enjoys a feeling of enclosure and is typified by small fields, hedgerows and trees. They provide an attractive setting for Pretwood Hill. It is argued that the Canal Way site also displays attractive features which are enjoyed from a number of footpaths and that development here would have a detrimental impact on the setting of Herne Hill. However, the proposed development here would be at a lower level than the hill and the location of the existing playing fields would mean that the impact on the hill, in views from the east, would not be unduly detrimental and the visual impact from elsewhere could be minimised through appropriate planting and site layout. I accept that views from a number of footpaths in the area would change but that alone is not a sufficient reason to reject the proposal and there is no reason to conclude that where necessary such routes could not be satisfactorily assimilated into the development through appropriate layout and planting.

21. The landowner at Shudrick Valley submitted a Landscape and Visual Appraisal which concludes that although the site 'has more trees, hedgeline and a stream' (than Canal Way) the development of the area would enable those features to be managed and embellished. In my view it is those features which contribute significantly to the landscape value of the area and because of the topography and richness of character this would be a demanding site to develop successfully. In comparison Canal Way has few such features although there is no reason to conclude that appropriate significant new planting could not be provided as part of any development proposals. It was suggested that any built form at Canal Way would be 'of ubiquitous housing estate design' and would not enhance the wider town but on the evidence before me I cannot draw such a conclusion and consider there is no reason why a high quality development, both in terms of appearance and functionality, could not be achieved (as advocated in section 7 of the NPPF).

22. In terms of positive impacts it is correct that the Shudrick Valley site scores

marginally higher than the Canal Way site in terms of services and facilities, economy and traffic. The Shudrick Valley site is closer to the town centre and its associated facilities but I walked to the town from Canal Way and although it is a longer distance, the route is level and relatively straightforward (and is also suitable for cyclists). In terms of economy the Council considers that the proximity of the Canal Way site may encourage out-commuting along the A303. However, that site is also closest to the town's main employment areas so it could contribute towards reducing the need to travel by car. In any event there is no conclusive evidence that residents in a Shudrick Valley development would be more likely to work in the town. With regard to traffic it is proposed by the landowner that development at Shudrick Valley would include an alternative route for traffic to and from Long Orchard Hill which would avoid much of the town centre. Although this may be a tangible benefit of the development I was told that, although desirable, it is not a pre-requisite of any scheme. Therefore the benefits of Shudrick Valley are not, in my opinion, sufficient to outweigh the negatives.

23. As well as the elements of the SA referred to above the owners of the Shudrick Valley site also raised concerns regarding the scoring in relation to health and well-being; the historic environment; and the quality of agricultural land. It was suggested that more weight should have been given to access to greenspace from the Shudrick Valley site and the proximity of dentists and pharmacies in the town centre. However, the Canal Way site is adjacent to the new Medical Centre and also enjoys good access to greenspace. In terms of the historic environment I saw that views of the Shudrick Valley site can be enjoyed from a small number of locations along East Street and Townsend (several from within the conservation area) and that the setting of the conservation area would be harmed by development at this location. Canal Way is a significant distance away from the conservation area and development there would not affect its setting. In terms of agricultural land, development at Shudrick Valley would result in the loss of high quality land. Whilst it is also possible that development could infringe on high quality land to the south of the direction of growth at Canal Way, the Council considers it unlikely that development would extend this far[16] but in any event the loss would be greater at Shudrick Valley.

24. A number of other issues were raised relating for example to flood risk, wildlife, crime and listed buildings but no evidence was submitted that would lead me to alter the conclusion that the revised SA, which has been independently assured, provides a satisfactory basis on which decisions about the direction of growth for Ilminster can be taken. For the avoidance of doubt I have attached no weight to the potential for a new school to be located at Canal Way because it is currently not a commitment of the Education Authority.

Conclusion on Issue 1

25. The review of the SA for Yeovil and Ilminster has been thorough and the conclusions that are reached are justified. It is inevitable that in a process such as this there may be an element of subjectivity and with regard to some elements of the SA there may be little to differentiate potential development

[16] CD 161d Appendix II

sites but it is clear that the Council has taken into account the potential environmental, economic and social impacts of the proposals; has considered reasonable alternatives; and has demonstrated that the LP appropriately reflects sustainability objectives. In this respect the LP is therefore sound.

Issue 2 – The Settlement Hierarchy

26. The South Somerset Settlement Role and Function Study[17] sets out the rationale behind the settlement hierarchy, which includes Yeovil at the top, followed by primary market towns, local market towns, rural centres and rural settlements. In terms of Yeovil, the Study also provides the justification for directing the largest proportion of growth to the town because it already acts as a focal point for employment, education, retailing, leisure and other activities. New development would consolidate and strengthen the town's role and would enable a higher level of self-containment to be achieved. The Council advocate that just below 50% of the proposed employment growth in the District should be directed towards Yeovil and there is no substantive evidence that would lead me to conclude that such an approach is not sustainable and sound.

27. The Council has identified two categories of market town – primary and local, based largely on the size and function of the settlements. There has been some criticism of this approach by representors but the Role and Function Study, in Table 6.4: Settlement Classification Summary, concludes that the three local market towns (Ansford/Castle Cary; Langport/Huish Episcopi; and Somerton) do not demonstrate self-containment or provide sustainable travel opportunities (unlike the primary market towns). The population of Somerton is slightly higher than the other two local market towns and it was suggested that the town should be a primary market town or indeed that there should be no differentiation between the two types of market town. However, having visited the settlements and considered the evidence submitted it can be concluded that the Council's overall approach is justified and in all other respects sound.

28. Six rural centres are identified by the Council where limited development would be supported to meet local needs. Other smaller settlements are classified as rural settlements (e.g. Templecombe), which are considered to be part of the countryside and are therefore afforded protection from any significant growth, although policy SS2 would enable some development to take place, for example if a proposal would meet identified housing need and/or would provide employment opportunities appropriate to the scale of the settlement.

29. It was suggested that East Coker should be classified as a rural centre rather than a rural settlement, thus potentially enabling a higher level of growth in the village. However, the Council's classification of settlements based on the themes of strong employment role, important retail and community services, sustainable travel opportunities and self-containment (CD34) is sound and on that basis the classification for East Coker is appropriate. In any event policy SS2 would allow for the development needs of such settlements to be met, subject to certain criteria.

[17] CD34

Conclusion on Issue 2

30. The approach proposed by the Council would be sustainable and would ensure that any growth was commensurate with the size and function of the settlement concerned. No substantive evidence was presented to demonstrate conclusively that the Council's approach is not sound.

Issue 3 – The Housing Requirement

31. The Council is promoting an economic-led approach to housing growth in the District and among the issues that it has taken into account are demographic projections, the economic potential of the District, affordable housing need, environmental capacity, vacant homes and housing delivery. It is inevitable that there will be difficulties in undertaking this comprehensive approach, for example in terms of evidence availability and currency, the assessment of likely future trends, the weight to be given to various sustainability factors and the uncertainty regarding the current economic conditions. The Council has undertaken a significant amount of evidence gathering and assessment and I am satisfied that a proportionate evidence base is available and that the local plan is based on an integrated approach to future development. The issue is whether the evidence upon which the housing element of the plan is based is sound.

32. The Council is proposing at least 15,950 dwellings between 2006 and 2028 and the methodology used is summarised in section 4 of the Housing Topic Paper (CD14). The identification of housing need has broadly been approached from two directions - projections based primarily in relation to economic development objectives; and a demographic projection based approach. The consequences of affordable housing need, environmental capacity, bringing empty homes back into use and housing delivery have all been added to the equation. In these circumstances this is an acceptable approach to defining housing need.

(a) housing projections based on economic development objectives

33. Initially there was a lack of clarity regarding certain aspects of the Council's approach to employment provision and consequently more work was undertaken and a further hearing session was held in June 2013. Despite the further clarification a wide range of views regarding the Council's approach continued to be expressed. Some respondents consider the Council's approach to be overly optimistic while others suggested that it is unnecessarily cautious. There was also criticism of the Council's evidence base and inappropriate use of statistics. A very significant amount of evidence was submitted with regard to this Issue (some of it being contradictory) and it would be inappropriate to repeat it or comment on every aspect of it in this Report. Suffice it to say I have read all the submissions and I have understood the concerns that have been raised.

34. The starting point must be the objectives of the NPPF, which include securing economic growth by building a strong, responsive and competitive economy. The planning system should do everything it can to support sustainable economic growth and significant weight should be placed on the need to

support economic growth through the planning system[18]. Also to be taken into account is the advice that local plans should be aspirational but realistic and that a proportionate but robust evidence base should be used. The Council is required to positively seek opportunities to meet the development needs of its area and the NPPF makes it clear that securing economic growth and boosting significantly the supply of housing, are two principles to be followed.

35. The Council relies primarily on the document entitled 'Housing Requirement for South Somerset and Yeovil' - known as the Baker Report[19] (BR) which in summary considered three approaches to derive a range of housing figures: a demographic projection based approach; a purpose based approach; and a delivery based approach. This led to the consideration of two economic scenarios – positive economic growth (11,200 jobs) and faltering economic recovery (7,200 jobs). The BR originally covered the period between 2006 and 2026 but the data has been projected forward to 2028. Following refinement of the figures the Council has concluded that for the period up to 2028 faltering growth may result in a net gain of 8,650 jobs and positive growth a net gain of 12,750 jobs. These figures would translate into housing requirements of 13,600 and 17,650 dwellings respectively. The Council has decided to base its economic growth target on a mid-way point between the two scenarios – identifying a minimum of 11,250 jobs to be delivered over the plan period, with a resultant requirement for 15,950 dwellings (including 300 dwellings for service personnel). The selection of the mid-way point was based on the length and depth of the recession and continuing economic uncertainty and bearing in mind recent signs of economic recovery, the identification of this minimum figure is reasonable.

36. There were significant differences of opinion, regarding economic growth, between the Council and a small number of representors and the issue was addressed by all the parties in a high level of detail. Among the issues raised were:

    - The combining of ABI (Annual Business Inquiry) and BRES (Business Register and Employment Survey) data

37. Although combining ABI and BRES data is not recommended[20], it is confirmed by ONS that given the lack of appropriate data it 'would seem logical to combine ABI/BRES with APS (Annual Population Survey) to get a view of the economic make-up of the District'[21]. If that approach is to be followed it is necessary to make discontinuity adjustments to the data and that has been done by the Council[22].

38. Concerns were expressed regarding the Council's assessment of the 2011 BRES data and the fact that the 2012 data had not been used. I understand these concerns but as referred to in my Introduction, having submitted the plan, it would not have been reasonable to expect the Council to 'change tack' every time new figures are published unless they demonstrate that the Council is significantly awry in its approach. A balance needs to be struck bearing in

[18] NPPF paragraph 19
[19] CD30
[20] SSDC H037
[21] SSDC H018
[22] SSDC H039

mind that the biannual monitoring and review process[23] will inform the Council as to whether or not a change in direction is required.

- Historic growth patterns

39. The Council confirmed that between 1991 and 2008 the level of economic growth in the District was comparatively high and this trend provides a justification for the Council's continued support for a thriving local economy. It is also relevant that unemployment levels in the District have been consistently below the regional average, thus indicating a reasonably healthy economic situation. The evidence demonstrates that the Council has taken into account historic employment growth patterns.

- The number of Agricultural workers

40. It was suggested by interested parties that the reduction in the number of agricultural workers in recent years has not been taken into account by the Council. However, the Council's evidence in SSDC H040 satisfactorily explains the situation and the figure of 1,000 people working on farms is reasonable.

- Changes in the number of Ministry of Defence (MoD) personnel

41. There was debate about the likely future number of MoD civilian and service personnel but although there cannot be certainty over MoD numbers in the current circumstances, there is no compelling reason to doubt the current figure of 300 families that may need off-site accommodation[24].

- Job provision in Yeovil

42. Representors suggested that the 49% of the total jobs growth in the District being proposed for Yeovil was an over-estimate and that 42.7% would be statistically more appropriate. The Council, however, has satisfactorily justified its approach to this matter, for example in SSDC H040, and bearing in mind NPPF paragraph 154 supports aspiration and advises that significant weight should be placed on the need to support economic growth (paragraph 19), it can be concluded that the Council's approach is justified.

- little demand for Yeovil employment sites

43. The Council has confirmed that interest in employment sites in Yeovil remains strong[25] and no substantive evidence was submitted to the contrary.

- employment in rural areas

44. Policies SS2, SS3, EP4, EP5 and EP8 support rural employment and in the right circumstances there are opportunities for some residential development in the rural areas. However, Yeovil is the main settlement in the District and the Council's decision to focus sustainable development in the town is sound. There is no conclusive evidence to demonstrate that the Council's approach

[23] Minutes of District Executive on 06.02.14
[24] SSDC H007
[25] SSDC H040 page 14

would significantly disadvantage rural businesses.

- the self-employed

45. Initially the Council concluded that 11.4% of the workforce would be self-employed but following a more detailed analysis[26] this was increased to 15.21%[27] and the evidence confirms that this is an appropriate figure to include in the formulation of policy SS3.

- strategic employment sites

46. It was argued by representors that there may be the potential for identified strategic employment sites to accommodate sufficient employment growth up to 2028 and therefore additional employment land need not be identified. However, this would result in the loss of the opportunity to provide employment in the smaller settlements which may reduce their self-containment and would be contrary to the principles of sustainability.

47. Having considered all the evidence, including the Council's Supplementary Statement on Issue 3: Economic Prosperity and Employment Provision (SSDC HO36) and the evidence in the Employment Background and Further Evidence Base Report (CD167) I am satisfied that the contribution that economic assumptions have made towards justifying the requirement for 15,950 dwellings, is sound.

(b) demographic projection based approach

48. The Baker Report considered population and household projections and concluded that based on past trends 16,000 dwellings would be required up to 2026 – increased by the Council to 17,200 to take into account the extra two years of the plan period. However, in order to take into account lower employment projections[28] this figure was reduced to 15,950 dwellings as referred to in the previous section. It is this figure that I interpret as being the Council's objectively assessed need. A range of permutations were considered by the Council[29] but the figure of 15,950 is with in the range of household and economic growth projections

49. The household projections published on 9 April 2013 (which are up to 2021 but have been projected forward to 2028 by the Council) conclude that the number of dwellings required in the District would be 13,200[30]. Housing requirements based on population projections would result in a requirement for 15,450 dwellings[31]. NPPF paragraph 159 refers to meeting 'household and population projections' and on this basis I am satisfied that the Council's allocation of 15,950 dwellings would be meeting need.

50. There was some criticism from representors about the way the Council has undertaken some of the calculations, for example with regard to the household

[26] CD117 – Workshop 19 and Workshop 20 papers
[27] SSDC HO36
[28] CD11
[29] CD14
[30] Council's response to Inspector's Question 5
[31] M48 in CD3b

occupancy rate. The Council has concluded that the average occupancy rate at 2028 will be 2.10 people per dwelling (based on 2008 projections). If the April 2013 figures are used the occupancy rate would be about 2.19 persons per dwelling. A figure of 2.144 is also suggested to be the evidence based figure[32].

51. The Council argues that it is justified in using the 2.10 figure because the economic circumstances at the time the census was undertaken were abnormal and not long-term. It is clear that there is no certainty regarding the household figure and the planning practice guidance confirms that housing assessments are not rendered outdated every time new projections are issued. Bearing in mind the Government's objectives of boosting the supply of housing and building a strong competitive economy and the Council's objective of securing Yeovil as the prime economic driver within the District and beyond, then the Council's approach is reasonable. Again this is an area where the Council's monitoring framework will enable changes in the housing situation to be identified and acted upon, bearing in mind the need to keep the LP as up-to-date as possible.

52. Concerns were also expressed regarding the currency of some of the data used. However, the Council did review its evidence on a number of occasions and bearing in mind the process of establishing need is not an exact science it can be concluded that the approach adopted by the Council has been sufficiently thorough and proportionate.

53. In terms of the demographic projection based approach, the figure of 15,950 dwellings will ensure that identified need is met.

(c) provision in relation to affordable housing need, environmental capacity, the use of empty homes and the five year housing land supply

54. In terms of **affordable housing** the Strategic Market Housing Assessment (2009) estimates that there is a net need for affordable housing within the District of 659 dwellings a year. It would not be realistic to expect such a high level of provision to be made, especially as there are viability considerations. The Council sets out a 35% target for affordable housing provision on all but small sites, where a reduced contribution would be expected and confirms that the viability of any proposals would be taken into account. This is a reasonable and justified approach.

55. The **environmental capacity** of the district to accommodate the proposed level of growth is evidenced through the Strategic Housing Land Availability Assessment (SHLAA) and the SA. Although there are a number of environmental constraints, for example the AONBs and the Somerset Levels and Moors, the SHLAA identifies a total potential housing supply in the District (up to 2026) of over 26,000 dwellings.

56. In 2007 there were about 1,600 **empty homes** in the District[33]. This represents about 2.7% of the housing stock and is lower (for both the public sector and the private sector) than the national average. The 2011 census

[32] HD 013
[33] CD30

identifies 3.6% of the total housing stock being empty but by taking a trend based approach (rather than relying on a single point in time) the number of empty homes in the District is not unduly high and in any event some level of vacancy is required in order to retain dynamism in the housing market. The Planning Practice Guidance confirms that any approach that counted bringing empty homes back into use against housing need would have to be robustly evidenced and no such detailed evidence was submitted. The Council is justified in not making a reduction to the overall housing requirement to take into account empty dwellings.

57. In order to reflect current circumstances the Council up-dated its evidence regarding the **five year housing land supply**. The conclusion is that a supply of 5 years and one month (including a 20% buffer) can be demonstrated. The requirement would be 5,230 dwellings and the supply would be 5,312 dwellings. No substantive evidence was submitted to contradict the credibility of the Council's figures and in any event the Council's bi-annual monitoring report will be able to identify and act upon any unforeseen change in circumstances. The housing trajectory for 2014/15 – 2028/29, as presented in the Council's response to Issue 1 of the resumed hearings, demonstrates the availability of housing land to meet objectively assessed need for five years and further indicates a supply of potentially developable sites for the latter part of the plan period. It was suggested that the Council may be overly optimistic with regard to the delivery of some of the sites but it must be accepted that precision cannot be guaranteed in any forecast and in any event the monitoring reports will ensue that any change in circumstances is identified at an early stage, thus enabling remedial action to be taken as necessary.

58. Concern was expressed regarding the assessment of household figures (including the 66,635 figure[34]) but I agree with the Council's assertion that demographic projections are only part of the approach to defining housing needs. The Council set out a comparison of household and population projections in SSDC HD013[35] which demonstrates the wide range of potential projections but confirms that the Council's housing figure sits comfortably within the identified range.

Gypsies and Travellers

59. The submitted LP sets out the broad approach to accommodating the needs of the gypsy and traveller communities in the District. However, following the initial hearing sessions the Gypsy and Traveller Accommodation Assessment Update was published, which identifies need in Somerset up to 2032. As a consequence the Council is proposing to modify policy HG7 by the inclusion of specific requirements for residential pitches, transit pitches and travelling showpeople plots. The criteria for the location of sites will be retained in the policy. This approach more appropriately reflects the advice in Planning Policy for Traveller Sites[36] and consequently I recommend **MM8**.

[34] Table 2 of HD013
[35] Demographic Projections for Population and Households (June 2014)
[36] DCLG – March 2012

Conclusion on Issue 3

60. In terms of economic development there is always a risk that statistics can be interpreted and analysed in different ways and it is clear that there are significant differences of opinion about the way the Council has approached the matter. Among the issues of disagreement between the parties is the justification for selecting the mid-point figure of 11,250 jobs, the data relating to the number of self-employed, and the distribution of jobs across the District. The Council has specifically responded to some of the criticisms made about its approach and the Council's rebuttal statement[37] satisfactorily explains the approach that it has taken and the reasons for the decisions the Council has made with regard to economic prosperity and employment provision.

61. The Council cannot be expected to project employment levels with pin-point accuracy because no-one knows the exact rate at which the economy will recover (although recent predictions indicate that recovery will be well underway by 2015[38]) and therefore precision cannot be assured (especially as calculations can be sensitive to small changes) and it is inevitable that assumptions will have to be made. The Council is expected to use a proportionate evidence base and I am satisfied that in the current economic climate the Council's approach to employment provision is sound.

62. Among the factors that strengthen the acceptability of the Council's approach are:

    • the 11,250 jobs are expressed as a minimum figure. Therefore should monitoring indicate that economic growth may be accelerating faster than is currently predicted then there would be no barrier to accommodating a higher level of such growth;

    • the figure of 11,250 jobs lies between 8,060 and 12,500[39], which have both been derived from appropriate evidence but it is significantly closer to the higher potential level of economic growth; and

    • securing sustainable economic growth is a key objective of the Government and NPPF paragraph 19 confirms that significant weight should be placed on the need to support economic growth through the planning system.

63. With regard to the overall housing provision, the evidence demonstrates that the proposed provision of 15,950 dwellings would meet objectively assessed need based on estimated population projections (15,450 dwellings) and would exceed the latest District household projection of 13,200 dwellings, thus being in compliance with one of the main requirements of the NPPF. The fact that the proposed housing figure exceeds the figures that are based on demographic projections is not a reason to find the LP not sound. Firstly the over-supply of 500 dwellings is not excessive and secondly it provides the Council with a level of flexibility should circumstances change. It was suggested that the Council agreed its housing policies prior to assessing need but there is no substantive evidence that would lead me to that conclusion.

[37] SSDC H039
[38] Office of Budget Responsibility statement referred to in SSDC H040
[39] CD115 – Extension of Population, Household and Employment Projections 2026-2028

64. The Council up-dated the 'previously developed land figures' and other housing figures[40] and consequently amended the figures in policy YV1. However, in the interests of clarity and flexibility the Council is also proposing to insert the words 'at least' before the dwelling numbers in policies YV1 and SS5. I consider this is necessary to ensure that the plan is effective and to demonstrate that it has been positively prepared. **MM1** is therefore recommended to make the LP sound.

65. By adopting an economically driven approach towards housing provision, the Council has demonstrated its commitment to delivering and supporting economic growth throughout the District. However, this has not been at the expense of meeting objectively assessed housing needs based on household and population forecasts and I am satisfied that in all respects the Council has taken a justified and positive approach which is based on proportionate and adequate evidence, consistent with national policy and is sound.

Issue 4 – Yeovil Urban Framework and Yeovil Summerhouse Village

66. Concerns were raised that the Council's reliance on the single SUE (as originally proposed) to provide a relatively high number of dwellings did not provide sufficient flexibility and it was argued that the town should accommodate a higher level of growth than is currently being proposed in order to secure greater self-containment.

67. In such a large District it is important that an appropriate balance is achieved between providing sustainable development in the smaller towns and villages and strengthening the role of the main town. The achievement of one of these objectives should not be at the expense of the other. The evidence[41] demonstrates that the status of the various settlements has been appropriately considered (see also my conclusions on Issue 2) and the Council's proposals will provide the framework within which that balance can be successfully achieved.

68. Policy YV1 provides for 7,441 dwellings at Yeovil, of which 5,876 (nearly 80%) would be within the existing urban area. There is no substantive evidence to demonstrate that the two proposed SUEs could not be delivered as anticipated by the Council and it can be concluded that there would be sufficient flexibility in terms of housing provision in the town. Similarly there is no substantive reason to conclude that this level of development within the town itself cannot be achieved.

69. Yeovil Summerhouse Village is an urban regeneration area where there is significant potential to deliver environmental and other improvements. A Masterplan for the area has been prepared but the Council confirms that it is unlikely to be fully delivered until later in the plan period. Nevertheless this is clearly part of the town that would benefit significantly from regeneration and the inclusion of policy YV4, which identifies the suitability of the area for a mixed use scheme and establishes the principle upon which further work can be based, is justified.

[40] Page 7 of Council's Response on Issue 4 (District Wide Housing Provision)
[41] CD34

Conclusion on Issue 4

70. The Council's approach to residential development within and adjoining Yeovil (policy YV1) and policy YV4 on Summerhouse Village are sound in all respects.

Issue 5 – Yeovil Sustainable Urban Extensions

71. The submitted local plan included a proposal for a single sustainable urban extension (SUE) to the south and west of Yeovil (2,500 dwellings). However, as explained earlier in this Report, the location of the SUE was not satisfactorily justified (primarily due to inadequacies in the SA). Consequently the Council reconsidered and up-dated its evidence on this matter, including in relation to sustainability[42], the Yeovil Peripheral landscape Study[43] and traffic modelling[44].

72. Having considered the evidence (including the relationship between the scale of development and the provision of infrastructure and services) the Council concluded that there should be two SUEs – one to the south (approximately 800 dwellings) and one to the north east of Yeovil (approximately 765 dwellings). The revised and up-dated evidence that I refer to under Issue 1 satisfactorily demonstrates that this is a sound approach and I recommend it accordingly (**MM2**).

South Yeovil SUE

73. The Council is proposing an urban extension, of about 800 dwellings, to the south of the town on a site that had been recommended for development by the Inspector who examined the Local Plan in 2003. A range of services and facilities are proposed which will boost the sustainability credentials of the urban extension. Concern was expressed regarding a number of issues, including landscape impact; loss of high quality agricultural land; highway safety; light pollution; impact on heritage assets (including a scheduled ancient monument); and impact on the enjoyment of public footpaths.

74. Any area of significant growth around Yeovil would have an impact on the landscape but the proposed direction of growth to the south of the town would appear comparatively contained within its setting and with the provision of appropriate planting, open space and layout, would sit reasonably comfortably in the landscape. It was suggested that the policy should be modified to refer to structural planting (as is being proposed for the North East SUE). However, the circumstances are not the same. The South Yeovil SUE does not display the same visual characteristics as the North East SUE and there is no reason to doubt that the normal development management process will ensure that the landscape elements referred to in the Statement of Common Ground - May 2014 (SoCG) will be taken into account.

75. It is correct that some high quality agricultural land would be lost but a balance has to be struck between seeking to boost significantly the supply of housing and protecting land of agricultural quality. Bearing in mind that much of the land around Yeovil is of high quality, the Council has achieved an

[42] CD161a, b, c, d and e
[43] CD68v
[44] CD164

appropriate balance through the reduction in the scale of the direction of growth to the south of the town.

76. There is insufficient evidence to demonstrate conclusively that development would have serious consequences in terms of light pollution and there is no substantive evidence that there would be any threat to the setting of the ancient monument (Roman Villa) or to any other heritage asset. In that regard there has been no objection to the proposal from English Heritage. Similarly there has been no objection from the Highway Authority in terms of highway safety. If any localised transport impacts are identified these can be addressed at the planning application stage.

77. It is inevitable that the character of footpaths that traverse the area will change but there is no reason to doubt that they can be satisfactorily assimilated into any development scheme. In terms of biodiversity and flood risk, the evidence demonstrates that they do not cause a serious impediment to the development of the direction of growth and none of the relevant Agencies have submitted objections to the LP.

78. The scale of the South Yeovil SUE as now proposed is significantly less than originally proposed in the submitted LP and consequently the level of self-containment is likely to be less. The Council considers that the ambitious requirements of policy YV6 in terms of sustainable travel are unlikely to be met in these changed circumstances and I agree. A reduced requirement of 30% travel by non-car modes is now proposed (from 50%) and requirements relating to an electric car pool scheme have been deleted. Conversely the requirement relating to a Quality Bus Partnership has been strengthened. For reasons of pragmatism these changes are justified and will ensure that policy YV6 is deliverable and I recommend them accordingly (**MM2**).

79. There is a strong commitment from the land owner to the delivery of this site and its associated infrastructure and although there remains some uncertainty regarding secondary school provision in the town (there is likely to be insufficient capacity by 2022/23), the Statement of Common Ground with Somerset County Council[45] confirms that the two Councils are working together to secure the provision of new secondary capacity, either through a new school or the expansion of capacity on existing school sites. Work is scheduled to be completed by Summer 2015.

East Coker and North Coker Buffer Zone

80. Policy YV3 identifies a buffer zone between the South Yeovil SUE and East and North Coker. Originally it was designated to prevent the coalescence of the settlements with the proposed development and/or to protect the setting of historic assets. However, following the reduction in the size of the SUE there would now be a 'gap' of countryside between the identified buffer and the urban extension and therefore the function of the buffer has become unclear. Indeed there is no justification for the buffer and there is no substantive evidence that there is any threat to the identity or setting of East and North Coker or to any historic asset. Policy YV3 is not sound and it is therefore recommended that it is deleted (**MM10**).

[45] Dated 27th May 2014

North East Yeovil SUE

81. The proposed urban extension to the north east of Yeovil would be for approximately 765 dwellings and would include a similar range of services and facilities as the South Yeovil SUE. Issues raised by respondents include highway safety, the availability of public transport, provision of education and health facilities, flooding, impact on the landscape and potential anthrax contamination.

82. In terms of highway constraints there was no objection to the proposal from the Highway Authority and there is no reason to doubt that as part of the development management process appropriate access to the site can be satisfactorily achieved without detriment to the existing network. Similarly there is no reason to believe that appropriate public transport services to the area could not be provided. Indications are that medical and education facilities would be provided and although (as referred to in paragraph 79 above) the Education Authority has not made any formal decisions on the future of education provision in the town, the SoCG demonstrates that there is a commitment to determining the way forward very soon. It was suggested that the gas pipeline that traverses part of the proposed SUE may be an impediment to development. However, it is clear that the level of development proposed could be satisfactorily accommodated in the area without any impact on the pipeline.

83. With regard to the impact of the proposed development on the landscape, it is inevitable that because of the topography of the area, almost any strategic development site would have a visual impact on the setting of the town. However, as you travel south from Marston Magna it is clear that development already breaks the skyline at the top of the escarpment and in some locations it progresses down the slope. Whilst I have attached some weight to the visual consequences of development at North East Yeovil, landscape quality is only one element for consideration and in any event I am satisfied that appropriate mitigation measures in the form of substantial perimeter planting, would significantly soften the appearance of the development in views from the north and east. The Peripheral Landscape Study (Final Report)[46], whilst recording that the sensitivity of the skyline in this location is a notable concern, nevertheless concludes that the 40% open space standard and structural landscape provision should 'convincingly assimilate the site into its wider context' and I agree. In order to ensure that due weight is given to the need for substantial planting the Council is proposing an addition to policy YV2 that sets out the Council's expectations in this regard. I endorse this addition and recommend it accordingly (**MM9**).

84. In terms of flood risk concerns were raised regarding the consequences of surface water, particularly draining into the River Yeo. However, the Environment Agency expressed no objection to the proposed SUE and there is no reason to suppose that appropriate mitigation measures would not be included as part of any development proposal.

85. Reference was made to the conclusions of the Inspector who examined the South Somerset Local Plan. In his Report dated June 2003 he makes

[46] CD 68v and 68w

reference to a number of sites to the north of Yeovil but I do not know what evidence he had before him, what arguments he heard at the Inquiry or whether he considered the potential for mitigation measures to be implemented. He does refer to 'not breaching the scarp head that encloses Yeovil on its northern side without very strong grounds'[47] but he made that judgement in the knowledge that there were three key sites elsewhere (plus a fourth at Keyford) that he considered could be supported for development. Clearly the opportunities for growth on the edge of the town have now diminished by virtue of his recommendations.

86. Therefore the circumstances under which I am examining the LP have changed since 2003, not only in terms of the availability of sites but also with the publication of the NPPF and the significant development at Wyndham Park which is adjacent to the proposed North East Yeovil SUE. I am satisfied that the situation is now such that the identification of this SUE is supported by 'very strong grounds'.

87. Turning now to the potentially serious issue of anthrax contamination, which I raised with the Council prior to the resumed hearing sessions. It is clear that the Council is well aware of the concerns that have been raised and work has already been carried out to investigate whether or not anthrax spores are present. This approach accords with the advice in the Planning Practice Guidance that early engagement between the developer and the local planning and environmental health departments should occur. Five soil samples were taken from the site and no spores were detected. It was confirmed at the hearing session that further surveys would be required as part of any planning application process. There is no reason to doubt that a collaborative approach will be adopted and that the findings of any survey work would be taken into account by the Council. It was suggested at the hearing that the location where the tests were undertaken may not be where the carcasses were disposed of. The Council will have made a note of those comments and there is no reason to doubt that it will continue to undertake appropriate liaison to ensure that it is completely satisfied that development to the north east of the town would not put at risk the health of residents.

Conclusion on Issue 5

88. The Council has significantly reviewed its evidence base and I am satisfied that the most appropriate strategy with regard to the SUEs is now being proposed and that it is a strategy that is consistent with national policy and in all other respects sound.

Issue 6 – Delivery of Housing and Employment Growth

89. In my Preliminary Findings I raised concerns regarding the delivery of housing and employment prior to the adoption of the Site Allocations Development Plan Document (DPD). Decisions on planning applications should be made with a high degree of predictability and efficiency[48] and in order to achieve that objective the Council is now proposing to add paragraphs to policies SS3 and SS5 explaining that in appropriate circumstances it will take a permissive approach to housing (including in Crewkerne and Wincanton) and employment

[47] Paragraph 7.5.1 (Chapter 14A)
[48] Para 17 of NPPF

land proposals prior to the adoption of the aforementioned DPD. I conclude that such an approach accords with the presumption in favour of sustainable development, is consistent with national policy and is justified. **MM4, MM5** and **MM6** are therefore recommended.

Issue 7 – Primary Market Towns of Chard, Crewkerne, Ilminster and Wincanton

90. **Chard** is the second largest settlement in the District and the Chard Regeneration Scheme sets out a framework for sustainable growth in the town. The SoCG between the Council and the East Chard Development Consortium confirms that in principle the proposed development, including highways infrastructure, can be satisfactorily delivered. Of the 1,852 dwellings proposed, 1,750 are already committed.

91. Nevertheless concerns about the delivery of dwellings over the plan period were raised. The Council suggests that a figure of 120 dwellings per year is achievable between 2017/18 and 2028. This is a significant increase on past completion rates but the figure is confirmed as being achievable by the Development Consortium and there is no substantive evidence to the contrary.

92. There are risks to delivery at Chard, for example in relation to the provision of highway infrastructure and more particularly the Millfield Link Road. However, the SoCG confirms that there is agreement with the landowner to enable the delivery of the link road and in any event the SoCG suggests that there may be an alternative route for a link between the A30 and the A358. The evidence demonstrates that in principle a link between the two roads can be achieved and there is no reason to doubt that a more detailed consideration of the matter will be undertaken as part of any planning application process.

93. There is a commitment to securing the proposed growth in the town and there is insufficient evidence to justify adopting another approach at this stage. There have been many initiatives in the past that have been aimed at securing economic regeneration for Chard but they have been piecemeal in terms of their success. Against this background there appears now to be a more robust commitment to achieving the vision for the town. It was suggested that the Council has no alternative strategy to fall back on should the current proposals fail or if delivery is slower than anticipated. However, there is no persuasive reason to conclude that the proposed approach will fail and in any event such a circumstance would become evident through the Council's monitoring procedures. Should a problem of delivery arise then the Council could take appropriate remedial action at that time as a matter of priority.

94. In terms of employment provision the quantum of proposed development has been adequately justified by the Council and it is right that a town of this size, bearing in mind the role that it plays in the area and the evidenced demand for employment land, should provide for an appropriate scale of sustainable economic growth.

95. Some very specific issues were raised (for example in relation to funding and legal agreements), which although important, would more appropriately be dealt with at the planning application stage.

96. It can therefore be concluded that policies PMT1 and PMT2 are sufficiently

flexible and provide the basis on which decisions about the future of the town can be taken.

97. At **Crewkerne** development of 961 dwellings is proposed, of which 916 are already committed. Concern has been expressed regarding the delivery of the single large site primarily because of the infrastructure requirements. However, the Council has confirmed that a Section 106 Legal Agreement, regarding the delivery of the site, was signed in February 2013 and also that a linked S106 Agreement with Somerset County Council has also been signed. This indicates a commitment to moving forward and I am satisfied that the policy is sound. Nevertheless monitoring of the situation will be required to ensure that should progress not occur as anticipated, other measures would be considered. It was argued that because there is only one identified site, the requirement of NPPF paragraph 47 regarding choice and competition would not be met. However, there would be choice within the site itself and elsewhere on smaller sites within the town. The Council proposes to take a permissive approach when considering housing proposals adjacent to the development area, prior to the adoption of the Site Allocations DPD. This accords with national policy and is therefore recommended (**MM5**). In the circumstances the Council's approach is sound.

98. In terms of affordable housing provision, it is clear that, as with elsewhere in the District, full need within the town will not be met. In the circumstances it would be unreasonable to expect such need to be fully met but it is an issue that will need to be monitored by the Council. With regard to employment provision in the town, the provision of 10.5ha has been adequately justified[49] and the safeguarding of existing sites (policy EP3) is sound in the interests of supporting sustainable economic growth.

99. I have already referred to the SA for **Ilminster** under Issue 1 and have concluded that it is reliable and appropriate evidence to take into account in the consideration of growth options for the town. The Council has concluded that the identification of a direction of growth at Canal Way is a sound proposal and it can be concluded that this strategy is justified and deliverable and in all other respects sound. It is therefore recommended that policy PMT3 be replaced by a proposal for growth on the Canal Way site (**MM3**).

100. In **Wincanton** there is a residual requirement for only 5 dwellings up to 2028 (698 being already committed). The LP provides no indication of how any longer-term development needs, including those for affordable housing, would be met and the Council confirmed that it would be relying on the AMR to identify needs. This approach is not sound because it does not reflect an appropriate strategy for the town and incorporates insufficient flexibility. Therefore it is recommended that additional text be included in the LP which sets out a commitment from the Council to undertake a review of the housing and employment policies for Wincanton within three years and to take a permissive approach towards the consideration of housing proposals prior to the adoption of the Site Allocations DPD (**MM5**, **MM7** and **MM12**). It was suggested that the direction of growth should encompass a mixed use scheme in order to increase the supply of housing but I am satisfied that there is currently no justification for increasing housing provision in the short term and

[49] CD50(i) page 19

it will only be as a result of monitoring the situation that the Council will be able to decide whether or not any corrective action is required with regard to the long term.

Conclusion on Issue 7

101. In order to ensure that the Council's policies in relation to the primary market towns are sound I recommend the four MMs referred to in the paragraphs above.

Issue 8 – Local Market Towns

102. The direction of growth at **Langport/Huish Episcopi** is to the north, east and south-east of the settlements but the policy makes it clear that any development to the north must avoid coalescence with Wearne and there is no reason to doubt the Council's commitment to this objective. There are constraints to development, particularly in relation to areas of flood risk, biodiversity and landscape quality. Nevertheless the settlements enjoy a range of facilities and services, including a secondary school, and the direction of growth would be within walking and/or cycling distance of many of them.

103. It was proposed by a representor that the direction of growth should be widened to include land to the west of Newtown Road. The Council argued that development in that location would have significant landscape implications. The issue, however, has largely been resolved by the granting of planning permission on appeal[50] for 36 dwellings and open space on the land in question. In these circumstances I am satisfied that the Council has adequately justified the proposed direction of growth and I am satisfied that in all respects it is sound.

104. With regard to issues of highway safety, these would be addressed initially in the preparation of the Site Allocations DPD, although they are currently adequately covered in LP policy TA5.

105. In **Somerton** the direction of growth is to the west of the town and although the town enjoys a range of facilities and services, opportunities for growth are constrained, particularly by flood risk and historic environment factors. It was suggested that the town should accommodate a higher level of growth and although a good range of facilities and services is available in the town, I am satisfied that policy LMT3 sits comfortably within the Council's broad approach to development across the District. The Council is committed to monitoring and review and should circumstances change there is no reason to doubt that the Council would reconsider the role that Somerton could play in meeting development needs. Currently the Council's approach is reasonable and justified.

106. The direction of growth at **Ansford/Castle Cary** would be to the north of Torbay Road and east and west of Station Road. It was suggested by representors that the option to the south of the school would be a better site for development and in the SA this direction of growth does demonstrate some positive effects. However, the proposed area of growth is well related to employment provision, town centre services and facilities, the railway station

[50] Appeal ref: APP/R3325/A/13/2197541

and schools and would not have a significantly adverse impact on the landscape setting of the town and it can be concluded that the proposed direction of growth is sound.

107. There was significant debate regarding the requirement for the provision of a road between Station Road and Torbay Road, which is a long standing aspiration of the Council and forms part of the proposal. The Highway Authority has no objection to the proposed road and I consider that it would be beneficial not only to the passage of traffic, for example from the employment area, but also in terms of providing good access to the proposed development itself.

Conclusion on Issue 8

108. The policies for sustainable development in the local market towns are reasonable, based on a proportionate evidence base and are sound in all respects.

Issue 9 – Rural Centres, Rural Settlements and the Countryside

109. Policies SS1, SS2, SS3 and SS5 establish the broad framework for growth in these settlements, particularly with regard to employment and housing provision. There are no other applicable settlement-specific policies. Representations were submitted that suggested that specific policies should be formulated for the rural centres and that there is the risk that the needs of these settlements, particularly in terms of housing and employment, may not be met. However, the policies that are referred to above establish the broad framework for sustainable growth in these settlements and will enable the Council to undertake appropriate monitoring. This approach is consistent with findings in the South Somerset Role and Function Study.

110. Particular concern was expressed regarding the employment land requirement for the Rural Centre of South Petherton and the consequent role of the Lopen Head site in this regard. The Employment Land Review Stage 1[51] confirms that the Council considers that development at Lopen Head would 'cater for South Petherton'. Having visited the area I consider that this is a reasonable conclusion to draw because although the site is not within the settlement, the distance between South Petherton and Lopen Head is not significant in a rural context. This source of employment land has therefore correctly been taken into account by the Council in its assessment of demand at South Petherton. The Council concludes that an additional 0.66ha of employment land is required in or adjoining the settlement. Such an aspiration (which supports the objective of self-containment) is justified and it can be concluded that the Council's approach to employment provision at South Petherton is reasonable and the most appropriate strategy.

111. In terms of employment land provision in rural settlements it was confirmed by the Council at the 2013 hearing sessions that the employment provision in these settlements had not been properly evidenced. The justification for the employment figures was provided by the Council but it lacked clarity. Consequently the Council proposes to remove the precise figures for employment land in Rural Settlements and rely primarily on other local plan

[51] CD 50

policies when considering proposals for such development. I am satisfied that this approach is justified in the circumstances and that it is based on appropriate and proportionate evidence and therefore **MM11** is recommended. However, as the Council confirmed, this is an issue which should be robustly monitored.

112. In terms of other development in rural settlements and the countryside, a number of other policies, including EP4, EP5, EP15 and HG8, establish the Council's approach towards sustainable development in these locations and they meet the advice in the NPPF and are sound.

113. A number of other settlement specific issues were raised, for example in relation to highway concerns, the maintenance of local services and facilities and the influence of service personnel but the Council's evidence is sufficiently robust to support the approach it is advocating.

Conclusion on Issue 9

114. I am satisfied that the Council's policies for rural centres, rural settlements and the countryside (including employment land provision in rural settlements as reflected in modified policy SS3) are justified and in all other respects sound.

Issue 10 - Transport

115. Transport policies have an important role in facilitating sustainable development and NPPF paragraph 35 sets out a number of considerations to be taken into account. The Council has translated national advice into several comparatively detailed policies, for example on low carbon travel and travel plans and there was criticism that some of the requirements would be too onerous. However, each of the requirements of policy TA1 (low carbon travel) is satisfactorily justified by the Council and no substantive evidence was submitted to demonstrate that the provision of the requirements, including the electric charging points and the travel plans (policy TA4), would render development unviable. With regard to policy TA3, that relates only to Chard and Yeovil, the Council's requirements in terms of sustainable travel for those settlements are sound.

Conclusion on Issue 10

116. The Council's requirements in terms of sustainable travel are justified, reflect national policy and are sound.

Issue 11 – Health and Well Being

117. A particular concern was the lack of a reference in the LP to the provision of health facilities in policy SS6 (Infrastructure Delivery). However, the provision of a health centre is proposed in both of the SUEs and such services are referred to in the Infrastructure Plan[52]. The primary issue related to the funding of such services but insufficient evidence was available to enable any definitive conclusions to be drawn. In any event policy SS6 makes it clear that the list of infrastructure in the policy is not exhaustive and when the situation

[52] CD36

regarding funding and provision becomes clearer there is no reason why the Council should not give due consideration, through its AMR, to any new evidence that becomes available.

118. In terms of public open space, sports and recreation provision, and other community facilities, the Council has undertaken a number of assessments, which together comprise an appropriate evidence base. Some concerns were expressed by respondents regarding the lack of detail about the proposed Sports Zone (SZ). It is correct that policy HW2 does not include specific requirements but the details of the SZ have not been finalised (although consideration has been given to it including a swimming pool, sports hall, indoor tennis centre, gym and other health facilities). This is an aspirational proposal but it is based on a considerable amount of work and there is no reason, at this stage, to conclude that it could not be achieved. Policy HW2 sets out the parameters regarding the location of any such facility (preference being given to a site within Yeovil town) and such an approach is sound.

Conclusion on Issue 11

119. In the current circumstances Health and Well Being have been satisfactorily addressed by the Council and this element of the LP is sound.

Issue 12 – Design and Environmental Quality

120. In terms of protecting heritage assets in the District, the Council is proposing a number of minor modifications which clarify the approach to be taken and further advice will be provided in the forthcoming Heritage Strategy Supplementary Planning Document. Policy EQ3 adequately establishes the framework within which decisions on proposals that relate to heritage assets can be taken.

121. Policy EQ2 provides appropriate guidance on general design matters and policy EQ1 addresses ways in which climate change mitigation and adaptation can be taken into account. Together they represent a strong approach to ensuring that sustainable development will be achieved.

Conclusion on Issue 12

122. The Council's approach to design and environmental quality is sound.

Issue 13 – Infrastructure Delivery and Monitoring

123. The infrastructure requirements for each settlement are summarised in the LP and are based on The Report on Infrastructure Planning in South Somerset[53]. This Report sets out a funding schedule and includes a phasing programme for each infrastructure item. Policy SS6 establishes the means of delivery through planning obligations or through a Community Infrastructure Levy, once the Charging Schedule has been adopted.

124. Monitoring will be an on-going process, but reports will be prepared every six months. Each policy includes monitoring indicators and targets and the appropriate delivery bodies are identified. Irrespective of the monitoring

[53] CD36

mechanisms in place, the Council is committed to a comprehensive review of the LP every 5 years (LP paragraph 13.5) and a review of affordable housing viability every 3 years (LP paragraph 9.28).

Conclusion on Issue 13

125. I conclude that the LP is supported by evidence regarding infrastructure delivery and that it is capable of being satisfactorily monitored and that in these respects it is sound.

Other Matters

126. A small number of concerns were raised regarding the Yeovil Airfield Flight Safety Zone (policy YV5). However, the evidence submitted[54] satisfactorily demonstrates the need for these zones and their location and policy YV5 is sound.

127. The Council has deleted reference to the provision of 935 dwellings after the end of the plan period (to be located at the original SUE). This deletion was not supported by some representors, however, I do not consider this to be an issue of soundness because it relates to development beyond the period of the submitted plan.

Assessment of Legal Compliance

128. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan is identified within the approved LDS (January 2013) which sets out an expected adoption date of October 2013. The suspension of the Examination has resulted in a delay to the adoption date but up until the date of submission the Local Plan's timing was compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2007 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations HRA has been carried out and is adequate.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS (Shaping South Somerset: Strategy for Sustainable

[54] SSDC H030 to H032

	Communities).
Public Sector Equality Duty	The Local Plan complies with the Duty.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

129. The Proposed Submission Local Plan (2012) has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

130. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the South Somerset Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

David Hogger

Inspector

This Report is accompanied by the Appendix containing the Main Modifications

SOUTH SOMERSET LOCAL PLAN - Appendix – Main Modifications (8 January 2015)

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*. It should be noted that: some of the Main Modifications are inter-related; some have 'knock-on' implications for text elsewhere in the Local Plan, which will be included as part of the 'additional modifications' that are made by the Council upon adoption of the plan; and some result in the deletion/re-numbering of Local Plan policies.

Ref	Policy/ Paragraph	Main Modification
MM1	YV1 and SS5	(Up-date on housing figures and two urban extensions) **Policy YV1: Urban Framework and Greenfield Housing for Yeovil** Within the overall provision of at least ~~7,815~~ 7,441 dwellings at Yeovil, ~~6,250~~ 5,876 dwellings ~~should be located~~ are anticipated in the ~~u~~Urban ~~f~~Framework of the town, and ~~2,500~~ 1,565 dwellings at ~~a~~the ~~s~~Sustainable ~~u~~Urban ~~e~~Extensions. ~~1,565 dwellings in the sustainable urban extension should be built up to the year 2028, with the remaining 935 dwellings to be delivered after the plan period.~~ **Policy SS5: Delivering New Housing Growth** Housing requirement will make provision for at least 15,950 dwellings in the plan period 2006 – 2028. ~~of which~~ At least ~~7,815~~ 7,441 dwellings will be located within the Urban Framework of ~~or adjacent to~~ Yeovil~~, including a~~ and via two Sustainable Urban Extensions. ~~within the plan period, and a further 935 dwellings beyond the plan period~~. Footnotes to Policy: ~~* A further 935 dwellings are proposed at the Yeovil Urban Extension post 2028.~~ * 1,750 commitments at Chard reflects built and committed sites and that part of the strategic allocation proposed for Chard that is expected to be built out in the plan period. This latter is shown as committed as it is currently part of the saved proposal from South Somerset Local Plan 1991 – 2011. The additional provision is windfall development prior to April 2017 not currently consented (April 2012). The strategic allocation provides for 2,716 dwellings of which 1,220 are

Ref	Policy/ Paragraph	Main Modification
		anticipated in the Plan period with the rest, 1,496 expected post 2028. ~~** A total of 3,237 dwellings are proposed in Chard, of which 1,376 dwellings are proposed at the Chard Growth Area post 2028.~~ ~~*** 15,950 for the purposes of the overall provision is the District requirement to 2028. The cumulative total of 16,751 is 5% in excess of requirement but is considered in the context of development uncertainties and overall scale of provision, to be in broad agreement with the requirement.~~
MM2	YV2 and YV6 *(which becomes YV5)*	(Requirements for the two urban extensions including sustainable travel) **Policy YV2: Yeovil Sustainable Urban Extension<u>s</u>** The Yeovil Sustainable Urban Extension<u>s</u> should be located <u>in two areas</u> to the south ~~and west~~ <u>and north-east</u> of the town and should provide the following: The south area: • <u>Approximately</u> ~~11.0~~ <u>2.58</u> hectares of ~~'B' use class employment~~ land <u>for economic development</u>; ~~• 2,500 dwellings, 1,565 of which should be built in the plan period up to 2028,with the remaining 935 dwellings built after 2028;~~ • <u>Approximately 800 dwellings</u>; • ~~Two~~ <u>One</u> Primary school~~s~~ ~~and a Secondary school~~; • A health centre; <u>and</u> • <u>A neighbourhood centre</u>. <u>The north east area:</u> <u>• Approximately 2.58 hectares of land for economic development;</u> <u>• Approximately 765 dwellings;</u> <u>• One primary school;</u> <u>• A health centre;</u> <u>• A neighbourhood centre; and</u> • <u>Landscape mitigation to address:</u> o <u>Potential massing effects across the site's northward face; and</u>

Ref	Policy/ Paragraph	Main Modification
		○ Potential visual dominance at the site's edge and skyline. The Yeovil Sustainable Urban Extensions will be developed to the highest sustainability objectives and garden city principles, subject to viability. Development within the Yeovil Sustainable Urban Extensions will be permitted where features supporting bat movement are not severed and that access between feeding areas and roosts is maintained unless it can be proven that there would be no significant effect by the proposal on such features. **Policy YV~~6~~5: Delivering Sustainable Travel at the Yeovil Sustainable Urban Extensions** In order to deliver at least ~~50~~30% of travel originating from the Yeovil Sustainable Urban Extension by non-car modes, subject to viability, ~~(with the potential to increase this over time to at least 60%),~~ and in addition to the generic policies that support modal shift throughout the district and Yeovil, the Yeovil Sustainable Urban Extensions should seek to provide: i. Intrinsically linked well-designed infrastructure for footpaths and cycle ways ensuring filtered permeability that delivers journey times that are better or more comparable to those by car. ~~ii. Free deliveries for bulk shopping journeys using low emission/electric vans.~~ ii~~i~~. Car parking management at the Yeovil Sustainable Urban Extension's facilities, employment sites and ~~shopping~~ neighbourhood centre, which gives priority to electric vehicles, low emission and shared vehicles and non-car modes and which discourages car use for these short journeys. iii~~v. A~~ Encouragement for a traffic-free immediate environment with residential parking separated from the residential areas where it accords with the wider design principles established for the Yeovil Sustainable Urban Extensions. ~~Development at both of the Yeovil Sustainable Urban Extensions should also contribute to:~~ ~~iv. An Electric Car Pool scheme, with provision for on-going management.~~ ~~vi. Low emission bus routes that are designed to establish end-to-end journey times that are better or more comparable to those by private car.~~ ~~vii. A comprehensive network of real time public transport information for bus and train travel.~~

Ref	Policy/ Paragraph	Main Modification
		iv. Contributions to ~~A~~ a Quality Bus Partnership to deliver modern desirable bus routes with a frequent service that is designed to establish end to end journey times that are better or more comparable to those by private car together with ~~and~~ clean vehicle technology and improvements to public transport information. Planning obligations will be used to ensure proper phasing of transport provision to maximise provision prior to first occupation of individual elements of the development. These sustainable links shall be designed to enable easy access from the Yeovil Sustainable Urban Extensions to the town centre, main employment sites, transport interchanges, health and educational establishments and other community facilities. Proposals for infrastructure designed to support these measures will ensure that features supporting bat movement are retained and that access between feeding areas and roosts is not ~~served~~ severed and any proposed lighting is compatible with the conservation objectives of Natura 2000 site unless it can be proven that there would be no significant effect.
MM3	PMT3	(Ilminster Direction of Growth) The direction of strategic growth will be to the south ~~east~~ west of the town. ~~As part of any proposed development within the Direction of Growth, a road will be expected to be provided between Shudrick Lane and Townsend/Long Orchard Hill prior to its completion.~~
MM4 MM6 MM11	SS3 and Table 1: Employment Land Justifications	(Clarification of Council's approach, particularly with regard to employment land provision for Wincanton, the Local Market Towns, Rural Centres and Rural Settlements and the permissive approach to employment provision) **Table 1: Employment Land Justifications** [SEE PAGES 11 - 18 BELOW FOR FULL MODIFICATION] **Policy SS3: Delivering New Employment Land** The Local Plan will assist the delivery of ~~9,200~~ 11,250 jobs as a minimum, and ~~approximately 600,850 sq metres net/162~~ 149.51 hectares ~~gross of traditional employment land (Use Class B1, B2 and B8) to be directed to the following settlements~~ of land for economic development ~~for the~~

Ref	Policy/ Paragraph	Main Modification

~~period~~ between April 2006 and March 2028.

The identification of a B Use jobs figure for settlements establishes a target in line with the Council's forecast growth for the District over the plan period. Economic development of a main town centre type will be expected to comply with Policy EP11.

Prior to the adoption of the Site Allocations Development Plan Document, a permissive approach will be taken when considering employment land proposals in Yeovil (via the SUEs), and 'directions of growth' at the Market Towns. The overall scale of growth (set out below) will be a key consideration in taking this approach, with the emphasis upon maintaining the established settlement hierarchy and ensuring sustainable levels of growth for all settlements. The same key considerations should also apply when considering employment land proposals adjacent to the development area at the Rural Centres.

The jobs target for Rural Settlements will be achieved through sustainable development, likely to be small-scale, which supports a prosperous rural economy and accords with Local Plan policies SS2, EP4 and EP5; and the NPPF.

Settlement	Local Plan 2006-2028 Total Employment Land Requirement	Existing Employment Land Commitments (as at April 2011)	Additional Employment Land Provision Required (total employment land less existing commitments) ~~(As at April 2011)~~	Total Jobs to be encouraged 2006-2028 ~~(numbers in brackets indicates jobs in traditional 'B' Uses as defined by the Use~~	B Use Jobs

Ref	Policy/ Paragraph	Main Modification

				~~Classes Order)~~	
Strategic Town					
Yeovil Town*	44.84	39.84	5.0	~~2,943 (1,942)~~ 3,948	2,408
Yeovil Urban Extensions	~~7.0~~ 5.16	0.0	~~7.0***~~ 5.16	1,565 ~~(1,033)~~	955
Market Towns					
Chard*	17.14	~~17.14~~ 4.14	~~0.0***~~ 13.0	~~886 (585)~~ 1,083	661
Crewkerne*	10.10	10.10	0.0	~~472~~ 577 ~~(312)~~	352
Ilminster*	23.05	23.05	0.0	~~343~~ 419 ~~(226)~~	256
Wincanton***	~~8.61~~ 7.94	~~3.61~~ 3.56	~~5.0~~ 4.38	~~490~~ 599 ~~(323)~~	365
Somerton	~~4.91~~ 6.63	~~1.91~~ 1.56	~~3.0~~ 5.07	~~251~~ 307 ~~(166)~~	187
Ansford/Castle Cary	~~13.19~~ 18.97	~~10.19~~ 10.07	~~3.0~~ 8.9	~~223~~ 273 ~~(147)~~	167
Langport/Huish Episcopi	~~3.44~~ 4.01	~~0.44~~ 0.34	~~3.0~~ 3.67	~~233~~ 284 ~~(154)~~	173

Ref	Policy/ Paragraph	Main Modification

Rural Centres					
Bruton	~~2.56~~ 3.06	0.56	~~2.0~~ 2.5	~~828 (546)~~ 156	95
Ilchester	~~2.02~~ 1.02	0.02	~~2.0~~ 1.0	433	264
Martock/Bower Hinton	~~4.79~~ 3.19	~~2.79~~ 1.45	~~2.0~~ 1.74	163	99
Milborne Port	~~2.04~~ 0.84	0.04	~~2.0~~ 0.80	77	47
South Petherton	~~3.80~~ 2.47	~~1.80~~ 1.81**	~~2.0~~ 0.66	141	86
Stoke sub Hamdon	~~2.0~~ 1.09	0.0	~~2.0~~ 1.09	43	26
Other					
Rural Settlements	~~12.36~~	~~7.86~~	~~4.5~~	1,181	720
Total	~~161.85~~ 149.51	~~119.35~~ 96.54	~~42.5~~ 52.97	~~9,200 (6,072)~~ 11,249	6,861

* Yeovil, Crewkerne and Ilminster have strategic employment sites which are saved from the previous South Somerset Local Plan and Chard's strategic allocation based around Chard Regeneration Plan also includes employment provision. These sites combined equate to a total of 46.35 hectares, and this figure has been included in the overall floorspace figure cited in Policy SS3 above.
** This figure relates to Lopen Head Nursery.
~~*** Yeovil and Chard will deliver additional employment land beyond the plan period. Chard will~~

Ref	Policy/ Paragraph	Main Modification
		~~deliver 6 hectares and Yeovil will deliver 4 hectares beyond 2028, in association with their strategic residential growth.~~ *** The Council will undertake and early review of Local Plan policy relating to housing and employment provision in Wincanton. This will be in accordance with statutory requirements and completed within three years of the date of adoption of the Local Plan.
MM5 MM12	SS5 and para 4.103	(Permissive approach to housing delivery including at Crewkerne and Wincanton) Insert the following after para 4.103: Prior to the adoption of the Site Allocations Development Plan Document, a permissive approach will be taken when considering housing proposals in Yeovil (via the SUEs), and 'directions of growth' at the Market Towns. The overall scale of growth (set out below) and the wider policy framework will be key considerations in taking this approach, with the emphasis upon maintaining the established settlement hierarchy and ensuring sustainable levels of growth for all settlements. The same key considerations should also apply when considering housing proposals adjacent to the development area at Crewkerne, Wincanton and the Rural Centres. Insert as third paragraph to Policy SS5: Delivering New Housing Growth: Prior to the adoption of the Site Allocations Development Plan Document, a permissive approach will be taken when considering housing proposals in Yeovil (via the SUEs), and 'directions of growth' at the Market Towns. The overall scale of growth (set out below) and the wider policy framework will be key considerations in taking this approach, with the emphasis upon maintaining the established settlement hierarchy and ensuring sustainable levels of growth for all settlements. The same key considerations should also apply when considering housing proposals adjacent to the development area at Crewkerne, Wincanton and the Rural Centres.
MM7 and MM12	Para 6.94, Para 13.5 and Policy	(Approach to development at Wincanton) Insert the following after para 6.94: The Market Town of Wincanton is different from the other Market Towns by virtue of its high level

Ref	Policy/ Paragraph	Main Modification
	SS5	of commitments compared to the overall level of housing requirement considered appropriate for the settlement. As a consequence and given the expected build out rates set out in the housing trajectory, the latter years of the Plan offer limited levels of housing provision. It is considered likely given the front loading of development in Wincanton that the town will experience a subsequent period of assimilation of housing growth and slowing down of the local housing market. Should the housing market however remain locally strong and underpinned by employment growth in the settlement then the housing provision would need to be supplemented. Such a circumstance would be possible to evidence through the Council's on-going monitoring process which includes assessing housing and employment land delivery on a settlement by settlement basis. This will be reported six monthly via the Council's Authorities Monitoring Report. As well as the on-going monitoring process, the Council has committed to 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 completed within three years of the date of adoption of the Local Plan. Insert the following after para 13.5: 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 completed within three years of the date of adoption of the Local Plan. Insert the following after Policy SS5: ** 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 completed within three years of the date of adoption of the Local Plan.
MM8	HG7 and para 9.46	(Gypsies and Travellers up-date) Amend para 9.46 as below: The accommodation needs of gypsies and travellers and travelling showpeople should be considered along with the housing needs of the whole community. Government guidance makes it

Ref	Policy/ Paragraph	Main Modification
		clear that local authorities should consider the needs of the travelling community through the local plan process. A countywide assessment of the need for Gypsy, Traveller and Travelling Showpeople accommodation was ~~has been~~ undertaken in 2010 (final edit published in January 2011) which identifies need up until 2020. This has been further supplemented by the Gypsy and Traveller Needs Assessment Update, Somerset Local Planning Authorities (2013) which identifies need in Somerset up until 2032. The 2011 assessment identified a need for 10 residential pitches in South Somerset by 2015; this need has been met and exceed by 2 pitches. ~~This identifies that in South Somerset there is a need for 18 residential pitches between 2010 and 2020, 10 between 2010 and 2015 and 8 between 2015 and 2020. As well as the need for residential pitches there is also a need to provide transit capacity for 10 caravans within South Somerset by 2015 and for 4 additional Showmen's yards across Somerset. The Somerset Gypsy and Traveller Accommodation Assessment will need to be updated in order to establish need post 2020.~~ **Policy HG7: Gypsies, Travellers and Travelling Showpeople** The accommodation needs of Gypsies, Travellers and Travelling Showpeople will be met by ensuring that they are accommodated in sustainable locations where essential services are available. Site allocations will be made to accommodate at least: 23 Residential Pitches (from 2013 onwards) 10 Transit Pitches 6 Travelling Showpeople plots The following criteria …….

MM9	YV2	(Structural planting in North East SUE)
		Insert the following in (amended) Policy YV2 as the final bullet point under 'the north east area':
		
		• Landscape mitigation to address:
		  ○ Potential massing effects across the site's northward face; and
		  ○ Potential visual dominance at the site's edge and skyline.

MM10	YV3	(Deletion of Buffer Zone)

Ref	Policy/ Paragraph	Main Modification
		~~**Policy YV3: East Coker and North Coker Buffer Zone**~~ ~~An East Coker and North Coker Buffer Zone is identified to the west of the Yeovil Sustainable Urban Extension, within which development that results in coalescence with the settlements of East Coker and North Coker and/or adversely affects the setting of historic assets is precluded. Development (not of a built form) within the Buffer Zone may be acceptable as long as the coalescence of settlements is not caused as a result nor the setting of historic assets adversely affected. Existing development within the buffer zone will require special justification to add built development beyond existing permitted development rights.~~ ~~The development is compatible with features supporting bat movement; that access between feeding areas and roosts is maintained and any proposed lighting is compatible with the conservation objectives of a Natura 2000 site unless it can be proven that there would be no significant effect by the proposal.~~

Table 1: Employment Land Justifications

Location	Local Plan jobs growth (B Use jobs in brackets)	Employment land required for B Use jobs growth (ha)[1]	Existing employment land commitments (ha)	Quantitative and Qualitative justification for employment land	Local Plan additional employ-ment land require-ment (ha)
Yeovil Town	~~2,943~~ 3,948 ~~(1,942)~~ (2,408)	~~12.81~~ 20.49	39.84	Existing commitments more than provide for the quantitative requirement for land, however, given the significance of Yeovil and the fact that there are only two strategic sites (one of which is for a specific use, a high quality business park - 11.5 hectares, the other under construction) and the	5.0

				remaining sites are small scale commitments and vacant land it is suggested that an additional 5 hectares of land be provided in Yeovil. ~~This will be monitored and reviewed, as National Guidance is clear that Local Planning Authorities should facilitate economic growth in sustainable locations.~~ 5 hectare figure derives from the previous Local Plan's Inspectors report in which he recommended at least an additional 10 hectares of general employment land be provided in Yeovil. These 10 hectares were never allocated. In the context of the current economic climate, an additional 5 hectares of land is considered appropriate, to provide for a range and choice of sites. This will be monitored and reviewed, as National Guidance is clear that Local Planning Authorities should facilitate economic growth in sustainable locations.	
Yeovil Sustainable Urban Extensions	1,565 ~~(1,033)~~ (955)	~~6.81~~ 5.16	0	In the Yeovil Sustainable Urban Extensions the aspiration is to develop enough employment land to provide a job for each economically active resident, roughly one per dwelling. This land is location specific, so it all needs to be provided. ~~11~~ 5.16 hectares are required in total ~~with 7.0~~ 5.0 ~~hectares in the Plan period~~.	~~7.0~~ 5.16
Chard	~~886~~ 1,083 ~~(585)~~ (661)	~~3.86~~ 5.63	~~17.14~~ 4.14	Employment land allocation carried forward from saved Local Plan proposals. Chard provision of 13 ha is re-presented in the strategic allocation to be identified as	~~0~~ 13.0

				additional employment land requirement. ~~No additional need. 6 hectares of Chard provision will be built beyond the Plan period.~~	
Crewkerne	~~472~~ 577 ~~(312)~~ (352)	~~2.05~~ 3.0	10.10	Employment land allocation carried forward from saved Local Plan proposals.	0
Ilminster	~~343~~ 419 ~~(226)~~ (256)	~~1.49~~ 2.18	23.05	Employment land allocation carried forward from saved Local Plan proposals.	0
Wincanton	~~490~~ 599 ~~(323)~~ (365)	~~2.13~~ 3.11	~~3.61~~ 3.56	~~There is no quantitative argument for employment land, but from a qualitative perspective.~~ There is local concern that there is a lack of a balance between jobs and homes in Wincanton. The settlement has received a significant number of housing commitments but, unlike the other Primary Market Towns, it has no strategic employment allocation, yet its proximity to the A303 and the south east makes it well placed in terms of transport connectivity. Demand has been identified from four different sources, the highest being derived from the forecast made on the basis of historic completions in Wincanton (7.94ha as the highest identified source of demand).~~Whilst~~ Wincanton has a supply of ~~2.13~~ 3.56 hectares of employment land, with this in mind it is suggested that an additional ~~5~~ 4.38 hectares be provided as a minimum. This will make Wincanton more attractive to potential developers, providing the opportunity to have a range and choice of sites and help to support a more balanced, self-contained settlement.	~~5.0~~ 4.38

Somerton	~~251~~ 307 ~~(166)~~ (187)	~~1.09~~ 1.59	~~1.91~~ 1.56	~~There is no quantitative need for additional land, but to provide choice and aid self-containment, additional land is required. A minimum viable site size has been identified in consultation with Economic Development Officers, which will give scope for development to kick start employment growth - in the Local Market Towns the site size is considered to be 3 hectares.~~ Demand has been identified from four different sources, the highest being derived from the forecast made on the basis of historic completions in Somerton (6.63ha as the highest identified source of demand). Somerton has a supply of 1.56 hectares of employment land, with this in mind it is suggested that an additional 5.07 hectares be provided as a minimum in the settlement. This will provide choice and aid self-containment in Somerton.	~~3.0~~ 5.07
Castle Cary/Ansford	~~223~~ 273 ~~(147)~~ (167)	~~0.97~~ 1.42	~~10.19~~ 10.07 (*please note this figure reduces to 1.97 hectares if the pet food factory development is removed)	~~Although there is no quantitative argument for an additional supply of land and it is over inflated by development of the pet food factory. To provide choice and alternatives to Torbay Road, additional land is identified as required. A minimum viable site size has been identified in consultation with Economic Development Officers, which will give scope for development to kick start employment growth - in the Local Market Towns the site size is considered to be 3 hectares. Discussions with the Parish Council concluded that there is a need for 3 hectares~~	~~3.0~~ 8.9

				~~of employment land to aid self-containment.~~ Demand has been identified from four different sources, the highest of which is derived from the demand arising from two specific companies articulated through the South Somerset Workspace Survey (July 2013). Both companies require a combined figure of 8.9 hectares of employment land. The existing supply of 1.97 hectares (minus the 8.10ha for the pet food factory) is not sufficient and therefore the Local Plan should assist in the delivery of 8.9 hectares of employment land. Both companies will vacate their existing sites and the relocation of these businesses would free up their existing sites to accommodate the demand for employment land articulated in survey responses from three other sources.	
Langport/ Huish Episcopi	~~233~~ 284 ~~(154)~~ (173)	~~1.01~~ 1.47	~~0.44~~ 0.34	~~There is no quantitative need for additional land, but to provide choice and aid self-containment, additional land is required. A minimum viable site size has been identified in consultation with Economic Development Officers, which will give scope for development to kick start employment growth - in the Local Market Towns the site size, is considered to be 3 hectares.~~ Demand has been identified from four different sources, the highest of which is derived from South Somerset Workspace Survey (July 2013) (4.01ha as the highest identified source of demand). This is made up of the (unique) need of one specific large	~~3.0~~ 3.67

				employer and other smaller (and more typical) local companies. Langport/Huish Episcopi has a supply of 0.34 hectares of employment land, with this in mind it is suggested that an additional 3.67 hectares be provided as a minimum in the settlement. This will provide choice and aid self-containment in the settlement.	
Bruton	~~828~~ 156 ~~(546)~~ (95)	~~3.60~~ 0.81	0.56	~~It is difficult to accurately assess the amount of jobs growth that will occur individually in each Rural Centre, and therefore it is difficult to quantitatively assess the need for land in each settlement. From a qualitative perspective, to enable and support jobs growth and improve levels of self-containment, additional employment land should be supported in these settlements. A minimum viable site size has been identified in consultation with Economic Development Officers, which will give scope for development to kick start employment growth - in the Rural Centres the site size is considered to be 2 hectares.~~ Demand has been identified from four different sources, the highest of which is derived from a survey of local commercial agents (August 2013) (2.5ha as the highest identified source of demand). Whilst in theory Bruton has a supply of 0.56 hectares of employment land, this has been built and since local agents have made their assessment of future land requirements (2013 to 2028) in full knowledge of the land	~~2.0~~ 2.5

				already available in the town, 2.5 ha is supported. It will enable and support jobs growth and improve levels of self-containment in Bruton.	
Ilchester	433 (264)	2.25	0.02	Demand has been identified from four different sources of evidence. The highest figure is derived from the historic jobs growth figures, however, we know that a high proportion of historic jobs growth has taken place within the perimeter of RNAS Yeovilton, who confirm that any future jobs growth is likely to be accommodated within the existing air base. We therefore move to the second highest evidenced land demand figure for Ilchester which was provided by a survey of local commercial agents (August 2013). They recommend that 1 additional hectare be provided. This is considered to be a realistic figure given the potential pent up demand that has built up in the past due to a lack of existing development land in this settlement. Existing land supply in Ilchester is 0.02ha. We do not support that this should be deducted since local agents have made their assessment of future land requirements (2013 to 2028) in full knowledge of the land already available in the town. In view of this, we recommend that the Local Plan assist the delivery of an additional 1 hectare of employment land in Ilchester.	~~2.0~~ 1.0
Martock/	163 (99)	0.84	~~2.79~~ 1.45	Demand has been identified from four	~~2.0~~ 1.74

Bower Hinton				different sources of evidence. The highest figure is derived from the South Somerset Workspace Survey (July 2013) (3.19ha as the highest identified source of demand). The 3.19ha is made up of the (unique) need of one specific large employer and other smaller (and more typical) local companies. Martock/Bower Hinton has a supply of 1.45 hectares of employment land, with this in mind it is suggested that an additional 1.74 hectares be provided as a minimum in the settlement. This will provide choice and aid self-containment in the settlement.	
Milborne Port	77 (47)	0.40	0.04	Demand has been identified from four different sources, the highest being derived from the forecast made on the basis of historic completions in Milborne Port (0.84ha as the highest identified source of demand). Milborne Port has a supply of 0.04 hectares of employment land, with this in mind it is suggested that an additional 0.80 hectares be provided as a minimum in the settlement. This will provide choice and aid self-containment in Milborne Port.	~~2.0~~ 0.80
South Petherton	141 (86)	0.73	~~1.80~~ 1.81	Demand has been identified from four different sources, the highest being derived from the forecast made on the basis of historic completions in South Petherton (2.47ha as the highest identified source of demand). South Petherton has a supply of 1.81 hectares of employment land, with this in mind it is suggested that an additional 0.66	~~2.0~~ 0.66

				hectares be provided as a minimum in the settlement. This will provide choice and aid self-containment in South Petherton.	
Stoke sub Hamdon	43 (26)	0.22	0.0	Demand has been identified from four different sources, the highest being derived from the forecast made on the basis of historic completions in Stoke sub Hamdon (1.09ha as the highest identified source of demand). There is no supply of employment land, therefore with this in mind it is suggested that an additional 1.09 hectares be provided as a minimum in the settlement. This will provide choice and aid self-containment in Stoke sub Hamdon.	~~2.0~~ 1.09
Rural Settlements	~~966~~ 1181 ~~(6072)~~ (720)	~~4.20~~	~~7.86~~	~~The additional employment land requirement will provide for the job growth (B Uses) identified for the Rural Settlements and given that the Rural Settlements are spread over a wide geographical area, the figure allows for some choice. Most development will be very small scale.~~ Any additional employment land required to support the jobs expected to come forward in the Rural Settlements will be small-scale and will be expected to accord with Local Plan Policies SS2, EP4 and EP5.	~~4.5~~