



# Strategic Environmental Assessment for the Iminster Neighbourhood Plan

Environmental Report to accompany the  
Pre-Submission Regulation 14 consultation version  
of the Neighbourhood Plan

Iminster Neighbourhood Plan Steering Group

June 2021

## Quality information

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# Non-Technical Summary

## What is Strategic Environmental Assessment?

A strategic environmental assessment (SEA) has been undertaken to inform the Ilminster Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

## What is the Ilminster Neighbourhood Plan?

The Ilminster Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared to be in general conformity with the Adopted South Somerset Local Plan (2006-2028), with due regard given to the emerging South Somerset Local Plan Review (2016-2036).

It is currently anticipated that the Ilminster Neighbourhood Plan will be submitted to South Somerset District Council later in 2021 for subsequent independent examination.

## Purpose of this Environmental Report

This Environmental Report, which accompanies the Pre-Submission, Regulation 14 Consultation Version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The initial document was the SEA Scoping Report (June 2020), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Ilminster Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the Neighbourhood Plan has been assessed;
- The appraisal of alternative development strategies for the Neighbourhood Plan;
- Recommendations made to plan makers at earlier stages of the plan's development;
- The likely significant environmental effects of the current version of the Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Neighbourhood Plan; and
- The next steps for the Neighbourhood Plan and accompanying SEA process.

# Assessment of alternative approaches for the Iminster Neighbourhood Plan

## Neighbourhood Plan site assessment and initial shortlisting of sites

As part of the emerging South Somerset Local Plan 2016-2036, South Somerset District Council (SSDC) highlights that 839 dwellings should be delivered in Iminster by 2036. As of November 2019, 119 dwellings had been completed or committed to. In addition, the application 16/05500/OUT at Land South of Canal Way has agreed 400 homes in principle subject to the agreement of a Section 106. Therefore, Iminster has achieved a total provision of 519 dwellings, leaving a requirement of 320 dwellings in Iminster.

To deliver this requirement, the Iminster Neighbourhood Plan Steering Group were keen to consider through the evolution of the Neighbourhood Plan where new development should be delivered in the vicinity of the town. This was with a view to allocating sites for development through the Neighbourhood Plan to meet the requirement.

In light of this, an independent and objective assessment of the various sites available for development in the vicinity of the town was undertaken on behalf of the Neighbourhood Plan Steering Group in 2019 and early 2020.<sup>1</sup> This considered sites which had been previously considered through the Housing and Economic Land Availability Assessment (HELAA) completed for the South Somerset Local Plan Review<sup>2</sup> and sites which were put forward through a local 'call for sites' process<sup>3</sup>.

To support the consideration of the suitability of the sites for a potential allocation of a type appropriate for the Neighbourhood Plan, the Neighbourhood Plan site assessment process appraised sites against a range of criteria relating to suitability, availability and achievability.

Subsequent to this process, 19 of the sites were shortlisted as being appropriate for further consideration as potential allocations for the Neighbourhood Plan (**Table NTS1** below). The remaining sites were considered inappropriate to take forward for the purposes of the Neighbourhood Plan due to the following reasons:

- Sites had gained planning permission
- Sites were no longer available.

**Table NTS1: Sites taken forward for further consideration through the SEA process**

Site ID. <sup>4</sup>	Name of site, address	Size (Ha) <sup>5</sup>
12	Land Rear of New Wood House	2.0
13	Land South of Cross	2.4
14	Land North of Cross	1.0
15	Land South of Shudrick Lane	34.2
16	Former Horlicks Site, South of Station Road	11.0
17	Greenway Farm, West of Listers Hill	2.4
18	Bay Hill	2.4
20	Land South of Beacon Lane	3.8
21	Land to East of Old Orchard	3.8
22	Land to East of Winterhay Lane and Old Dairy	3.3
23	The Swan Yard	0.1
24	Gooche and Housego, Land Rear of the Market House	1.0

<sup>1</sup> ECA on behalf of Iminster Town Council (March 2020) Iminster Neighbourhood Plan Site Assessment Report

<sup>2</sup> South Somerset District Council (2020): 'HELAA' [online] accessible via: <https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/local-plan-review-2016-2036/>

<sup>3</sup> The site assessment report accompanies the Neighbourhood Plan at Regulation 14 consultation.

<sup>4</sup> Site IDs have been taken from the site assessment report completed by an independent planning consultancy on behalf of the Neighbourhood Plan Steering Group, and forms part of the evidence base of the emerging Neighbourhood Plan.

<sup>5</sup> Represents total site size and not necessarily total developable area.

Site ID. <sup>4</sup>	Name of site, address	Size (Ha) <sup>5</sup>
25	Land North of Station Road	4.8
26	Land East of Playing Fields, Shudrick Lane	1.2
27	Land to Rear of Blackdown View	6.6
28	Land East of Winterhay Lane	5.5
29	Land off Canal Way Phase 2	13.0
31	Land to East of Greenway, Listers Hill	1.8
32	Land to East of Greenway (Larger Site)	17.0

## Assessment of shortlisted sites through the SEA process

To support the consideration of the suitability of these shortlisted sites for a potential allocation of a type appropriate for the Neighbourhood Plan, the SEA process has appraised the key constraints and opportunities present at each of the 19 sites.

The findings of the appraisal are presented from Table 4.2 to Table 4.20 in the main body of the Environmental Report. Summary findings are presented below.

**Table NTS2: Summary of site assessment findings**

Site	Biodiversity and Geodiversity	Climate Change	Landscape	Historic Env.	Land, Soil and Water Resources	Population and Community	Health and Wellbeing	Transport
12	Yellow	Yellow	Blue	Red	Red	Green	Green	Green
13	Yellow	Yellow	Blue	Blue	Red	Green	Green	Green
14	Yellow	Yellow	Yellow	Blue	Red	Green	Green	Green
15	Blue	Blue	Blue	Red	Red	Green	Green	Green
16	Yellow	Red	Blue	Blue	Red	Green	Green	Blue
17	Yellow	Red	Blue	Yellow	Red	Green	Green	Blue
18	Yellow	Yellow	Blue	Red	Red	Green	Green	Green
20	Yellow	Yellow	Red	Yellow	Red	Green	Green	Green
21	Blue	Red	Yellow	Yellow	Red	Blue	Green	Blue
22	Red	Yellow	Blue	Blue	Red	Green	Green	Green
23	Yellow	Yellow	Yellow	Red	Green	Blue	Green	Green
24	Yellow	Yellow	Yellow	Blue	Green	Green	Green	Green
25	Blue	Red	Yellow	Red	Red	Green	Green	Blue
26	Blue	Blue	Yellow	Blue	Red	Green	Green	Green
27	Yellow	Yellow	Blue	Blue	Red	Green	Green	Green
28	Yellow	Blue	Blue	Yellow	Red	Blue	Green	Blue
29	Blue	Blue	Red	Yellow	Blue	Green	Green	Blue
31	Yellow	Blue	Blue	Yellow	Red	Green	Green	Blue
32	Blue	Blue	Red	Yellow	Red	Green	Green	Blue

Key		
Likely adverse effect (without mitigation measures)	Red	Likely positive effect
Neutral/no effect	Yellow	Uncertain effect

## Assessment of the current version of the Neighbourhood Plan

The current Pre-Submission version of the Ilminster Neighbourhood Plan presents 15 planning policies for guiding development in the Neighbourhood Plan area.

Prior to the finalisation of the current version of the Neighbourhood Plan, the SEA team undertook an appraisal of earlier versions of Neighbourhood Plan policies. At that stage, a number of recommendations were made to and considered by plan makers for further improving the sustainability performance of the plan.

Chapter 5 in the main body of the Environmental Report presents the findings of the appraisal of the Pre-Submission version of the Neighbourhood Plan. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Biodiversity and Geodiversity
- Climate Change
- Landscape
- Historic Environment
- Land, Soil and Water Resources
- Population and community
- Health and Wellbeing
- Transportation

The assessment has concluded that the current version of the Ilminster Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on delivering high quality housing which meets local needs, its focus on improving the quality of life of residents, its support for the economic and community vitality of the town, and its facilitation of green infrastructure enhancements. The Neighbourhood Plan also has the potential to lead to significant positive effects in relation to the 'Transportation' theme given its close focus on delivering enhanced walking and cycling networks, green infrastructure provision and public realm improvements in the town.

In terms of the 'Land, Soil and Water Resources' SEA theme, the allocations taken forward through the Neighbourhood Plan will lead to significant negative effects on soils resources. This is due to the required landtake on land classified as the 'best and most versatile' agricultural land. This loss should however be seen in the context of the lack of available previously developed land in Ilminster, and the Local Plan requirement for the town with regards to housing and employment delivery.

With regards to the 'Historic Environment' SEA theme, whilst the Neighbourhood Plan allocations are in a number of cases located in parts of the town with sensitivity for the historic environment, the Neighbourhood Plan policies provide a robust basis for the conservation and enhancement of the historic environment in Ilminster. The policies will also help with the realisation of the significant opportunities associated with the town's rich heritage resource, and support opportunities for the enhanced understanding and enjoyment of the historic environment locally. In terms of the 'Landscape' theme, whilst the allocation of the preferred sites has the potential to lead to impacts on landscape character locally, the Neighbourhood Plan has a close focus on conserving key views, protecting landscape and townscape character, and on enhancing green infrastructure networks. This provides an appropriate means of protecting and reinforcing local character in association with the delivery of the Local Plan's development requirement for the town.

The Neighbourhood Plan will also initiate a range of beneficial approaches regarding the 'Biodiversity and Geodiversity' and 'Climate Change' SEA themes. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan.

## Next Steps

This Environmental Report accompanies the Pre-Submission version of the Ilminster Neighbourhood Plan for Regulation 14 consultation.

Following consultation, any representations made will be considered by the Neighbourhood Plan Steering Group, and the Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, South Somerset District Council, for subsequent independent examination.

At independent examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the South Somerset Local Plan.

If independent examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by South Somerset District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Ilminster Neighbourhood Plan will become part of the development plan for Ilminster town.



# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Ilminster's emerging Neighbourhood Plan.
- 1.2 The Ilminster Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Adopted South Somerset Local Plan (2006-2028), with due regard given to the emerging South Somerset Local Plan Review (2016-2036).
- 1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to South Somerset District Council later in 2021.
- 1.4 Key information relating to the Ilminster Neighbourhood Plan is presented in **Table 1.1**.

**Table 1.1: Key facts relating to the Ilminster Neighbourhood Plan**

Name of Responsible Authority	Ilminster Town Council
Title of Plan	Ilminster Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Ilminster Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Adopted South Somerset Local Plan (2006-2028), with due regard given to the emerging South Somerset Local Plan Review (2016-2036).</p> <p>The Ilminster Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2036
Area covered by the plan	The Ilminster Neighbourhood Plan area covers the parish of Ilminster in South Somerset ( <b>Figure 1.1</b> ).
Summary of content	The Ilminster Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Martha Covell, ECA Architecture & Planning Email address: <a href="mailto:martha@eca-p.com">martha@eca-p.com</a>

## SEA Screening for the Ilminster Neighbourhood Plan

- 1.5 The Ilminster Neighbourhood Plan has been screened in by South Somerset District Council as requiring a Strategic Environmental Assessment (SEA).
- 1.6 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, the Ilminster Neighbourhood Plan has been screened in as requiring an SEA process for the following reasons:
- The Neighbourhood Plan will allocate new development in the parish. This includes potentially in environmentally sensitive locations, such as:
    - locations with sensitivity for the historic environment; and
    - locations with sensitivity for flood risk issues.
  - The Neighbourhood Plan has also considered alternative sites for development to those identified through the emerging Local Plan Review.
- 1.7 In light of this screening outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

## SEA explained

- 1.8 SEA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SEA for the Ilminster Neighbourhood Plan seeks to maximise the developing plan's contribution to sustainable development.
- 1.9 SEA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>6</sup>. It also widens the scope of the assessment from focusing on environmental issues to further consider community issues.
- 1.10 The Ilminster Neighbourhood Plan has been screened in by South Somerset District Council as requiring an SEA. To meet this requirement, the Neighbourhood Plan is undergoing an SEA process which incorporates the requirements of the SEA Directive.
- 1.11 The SEA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.12 Two key procedural requirements of the SEA Regulations are that:
1. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
  2. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the Regulation 14 version of the Ilminster Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

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<sup>6</sup> Directive 2001/42/EC

## Structure of this SEA Environmental Report

1.13 This document is the SEA Environmental Report for the Ilminster Neighbourhood Plan and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

**Table 1.2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory<sup>7</sup> requirements**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>8</sup>	
<b>What's the scope of the SEA?</b>	What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents and main objectives of the plan.</li> </ul>
	What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relationship with other relevant plans and programmes.</li> <li>The relevant environmental protection <b>objectives</b>, established at international or national level.</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
	What is the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
	What are the key issues and objectives?	<ul style="list-style-type: none"> <li>Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment.</li> </ul>
<b>What has plan-making/SEA involved up to this point?</b>	<ul style="list-style-type: none"> <li>Outline reasons for selecting the <b>alternatives</b> dealt with.</li> <li>The likely significant effects associated with <b>alternatives</b>.</li> <li>Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>	
<b>What are the assessment findings at this stage?</b>	<ul style="list-style-type: none"> <li>The likely significant effects associated with <b>the Regulation 14 version of the plan</b>.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the Regulation 14 version of the plan</b>.</li> </ul>	
<b>What happens next?</b>	<ul style="list-style-type: none"> <li>The next steps for the plan making / SEA process.</li> </ul>	

<sup>7</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>8</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

## 2. Local Plan context and vision for the Ilminster Neighbourhood Plan

### Local Plan context for the Neighbourhood Plan

- 2.1 The Ilminster Neighbourhood Plan is being prepared in the context of the South Somerset Local Plan 2006-2028<sup>9</sup> (adopted in March 2015), with due regard given to the emerging Local Plan review (later discussed). The Local Plan provides the broad policy framework and a long-term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within South Somerset District.
- 2.2 Ilminster is defined as a 'Primary Market Town' within the settlement hierarchy of the Local Plan due to its strong employment, retail and community role alongside Chard, Crewkerne and Wincanton. Policy SS1 'Settlement Strategy' states that provisions will be made for housing, employment, shopping and other services that increase the self-containment of the Primary Market Towns and enhance their roles as service centres. Policy SS5 'Delivering New Housing Growth' confirms a housing target of at least 496 dwellings for Ilminster to be delivered during the Local Plan period. Furthermore, Policy PMT3 'Ilminster Direction of Growth' confirms that the strategic direction of growth within the Neighbourhood Plan area will be to the south west of the town.
- 2.3 South Somerset District Council are in the process of undertaking a review of the Local Plan. The Preferred Approach version of the South Somerset Local Plan Review (2016-2036)<sup>10</sup> was published for Regulation 18 Consultation between June 2019 and September 2019. Within the emerging Local Plan Review, Ilminster retains its classification as a 'Primary Market Town' within Policy SS1 'Settlement Strategy', with Policy SS2 'Delivering New Housing Growth' confirming a net target of 839 new dwellings. Furthermore, Policy SS3 'Delivering New Employment Land' confirms a target of 4.0 ha of new net employment land provision.
- 2.4 The Preferred Approach version of the South Somerset Local Plan Review (2016-2036) outlines a proposed direction of growth within Ilminster, including the following four site allocations (shown overleaf in **Figure 1A**):
  - **Policy IM1** 'Housing Growth South West of Canal Way, Ilminster': (400 dwellings);
  - **Policy IM2** 'Housing Growth at Shudrick Lane, Ilminster' (210 dwellings);
  - **Policy IM3** 'Housing Growth at Station Road, Ilminster' (100 dwellings); and
  - **Policy EP1** 'Strategic Employment Sites' (Land at Station Road, Ilminster).
- 2.5 Neighbourhood plans will form part of the development plan for South Somerset, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in South Somerset, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.6 In terms of the proposed Local Plan Review allocations above, South Somerset District Council have indicated that they are content for alternative spatial strategies to be put forward through the Neighbourhood Plan, if supported by appropriate evidence and engagement with the community.

<sup>9</sup> South Somerset District Council (2015): 'South Somerset Local Plan (2006-2028)', [online] available to access via: <<https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/local-plan/>> last accessed [27/03/20]

<sup>10</sup> South Somerset District Council (2019): 'South Somerset Local Plan Review (2016-2036)', [online] available to access via: <<https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/local-plan-review-2016-2036/>> last accessed [27/03/20]

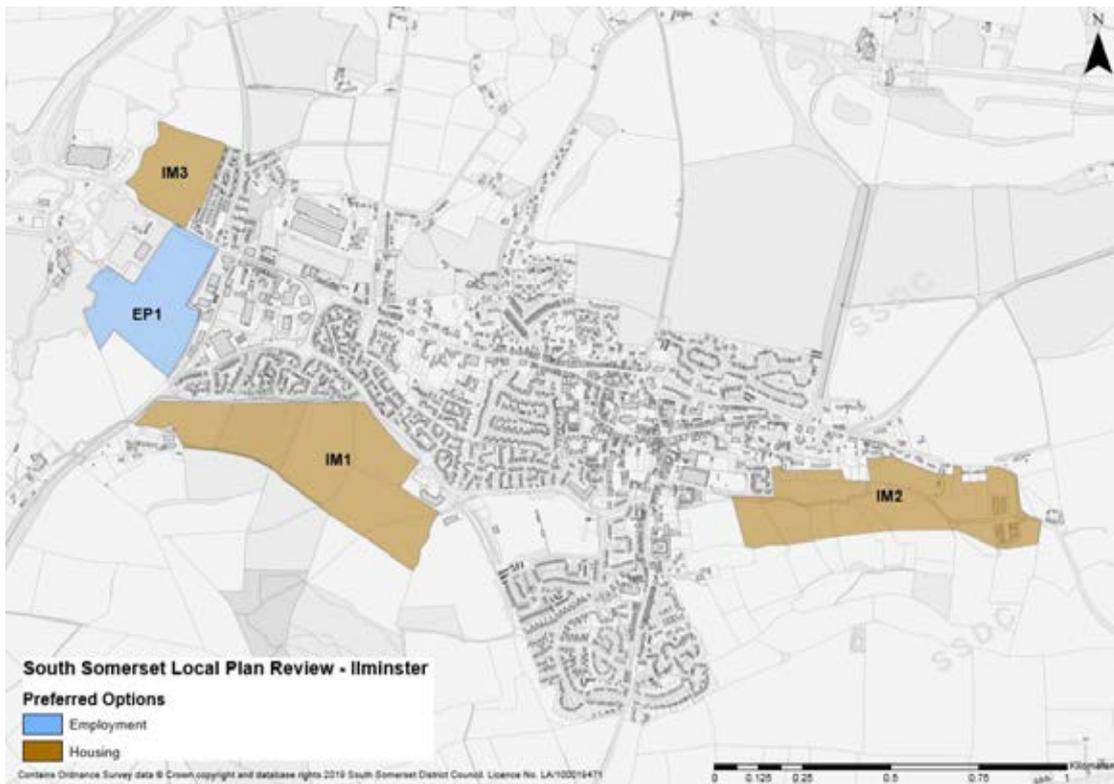


Figure 2.1: Preferred options for the delivery of new housing and employment land in Iminster through the emerging Local Plan Review (2016-2036)

## Vision and aims for the Neighbourhood Plan

2.7 The vision and aims for the Neighbourhood Plan capture the community’s views and aspirations for the town as expressed through the consultation process. It therefore forms the basis on which the neighbourhood objectives and proposed policies have been formulated.

### Vision and mission statement for the Neighbourhood Plan

“

**Vision:** *To be one of the most desirable market towns in which to live, learn, work, play and visit.*

**Mission:** *To create a stimulating, attractive, healthy, safe and sustainable environment through well-considered and balanced development that respects Iminster’s unique heritage and rural location, while embracing creativity, technology and innovation, for the community to thrive in a sustainable environment.*

### Vision and mission statement for the Iminster Neighbourhood Plan

”

## Neighbourhood Plan aims

2.8 The vision and mission statement is underpinned by a series of aims which were developed by the local community and form the foundation of the Ilminster Neighbourhood Plan. These aims are as follows:

- **Aim One:** Provide a broad mix of homes, which will serve existing and future residents of Ilminster and will reflect the character and appearance of the town.
- **Aim Two:** Allocate sustainable sites all of which will have good access to the countryside and town centre, to support Ilminster's shops and services and promote recreational activity and wellbeing.
- **Aim Three:** Achieve the highest design standards for all new development, by providing excellent layout and appropriate levels of parking, with each site generating a portion of on-site energy.
- **Aim Four:** Make Ilminster a more self-sufficient community and reduce commuting by preserving and enhancing existing infrastructure and employment floor space (falling within use class B1 and B2 in particular) and allowing an overall increase in employment floor space.
- **Aim Five:** Encourage biodiversity and water conservation and also safeguard the rural environment for food production and recreational amenity.
- **Aim Six:** Preserve and enhance Ilminster's unique built heritage and independent retail offering recognising its needs as an increasingly desirable visitor attraction.
- **Aim Seven:** Increase the use of Ilminster's parks and open spaces for all ages and abilities by improving existing facilities and creating new ones.
- **Aim Eight:** Provide improved and safe walking routes, from existing and new developments, to all the amenities in Ilminster's town centre, to reduce car use and to improve the health and wellbeing of residents.
- **Aim Nine:** Create a continuous network of green habitats, parks, waterways and nature trails between existing and new developments.
- **Aim Ten:** Reduce car use and encourage use of public transport, by working with partners to encourage better bus services to outlying villages, surrounding towns and transport hubs.
- **Aim Eleven:** Reduce car movements in Ilminster's town centre by implementing various traffic management measures.
- **Aim Twelve:** Plan for a greater use of sustainable transport, by providing electric car charging points, cycle racks and comfortable bus stops with lighting and shelters.

## 3. What is the scope for the SEA?

### SEA Scoping Report

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>11</sup> These authorities were consulted on the scope of the Ilminster Neighbourhood Plan SEA in June 2020.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
  - Baseline data against which the Neighbourhood Plan can be assessed;
  - The key sustainability issues for the Neighbourhood Plan; and
  - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

**Table 3.1: Consultation responses received on the SEA Scoping Report**

Consultation response	How the response was considered and addressed
<b>Natural England</b> <i>No response received</i>	
<b>Historic England</b> <i>Response received by Historic Adviser on 15<sup>th</sup> December 2020.</i>	
Comments to include	Considerations to include
We are pleased to see the references to our best practice guidance of relevance to the preparation of the Plan and the SEA, to which we would recommend that our guidance on Site Allocations is also included. Though this is entitled with reference to Local Plans it has equal application to Neighbourhood Plans, especially as they too eventually form part of the Local Development Plan and given the desirability for consistency in the methodology used to substantiate site allocations.	Historic England’s Site Allocations guidance has been considered through Neighbourhood Plan process.  The Neighbourhood Plan has been informed by the development of a detailed Design Guide for Ilminster by Ilminster Town Council.  The Design Guide identifies the distinctive characteristics of Ilminster, and for the key character areas within the town, sets out approaches relating to: layout and density; the street scene; building form; views and topography; landscape and roofscape; materials and detailing; and sustainable design. Central to the Design Guide is the historic environment, with a key focus being on the contribution the historic environment makes to local distinctiveness and character in different locations in the town.
<b>Environment Agency</b> <i>No response received</i>	

<sup>11</sup> In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme’.

- 3.4 Baseline information (including the context review and baseline data) is presented in **Appendix A**. The key sustainability issues and SEA Framework are presented below.

## Key Sustainability Issues

### Air Quality

- There are no AQMAs within the Neighbourhood Plan area. However, the ASR notes that the road network within the wider district is vulnerable to air pollution issues associated with congestion.
  - The ASR confirms that there is one designated AQMA in the district covering most of Yeovil town. The AQMA is located approximately 23 km to the east of the Neighbourhood Plan area.
  - Emissions associated with road transport (primarily NO<sub>2</sub>) are the main pollutant of concern.
- 3.5 Due to the absence of any significant air quality issues within the Neighbourhood Plan area itself, **the air quality theme has been scoped out for the purposes of the SEA process.**

### Biodiversity and Geodiversity

- The nearest European designated sites are located approximately 7.5km to the north east of the Neighbourhood Plan area, namely: Somerset Levels and Moors Ramsar and Special Protection Area (SPA).
- There are four Sites of Special Scientific Interest within 5km of the Neighbourhood Plan area, including: Hurcott Lane Cutting SSSI; Seavington St Mary SSSI; Woolhayes Farm SSSI; and Barrington Hill Meadows SSSI.
- The Herne Hill LNR is located within the central western section of the Neighbourhood Plan area, with the woodland and grassland areas supporting populations of nationally rare and locally important species.
- There are a variety of BAP Priority Habitats located within or within proximity to the Neighbourhood Plan area, including areas of coastal and floodplain grazing marsh, deciduous woodland, good quality semi-improved grassland and traditional orchard.
- The River Isle is a key component of the Neighbourhood Plan area's ecological networks. There are significant opportunities to enhance biodiversity corridors to and from the river across the parish.
- A large county geological site covers most of the town. Although the extent of its boundaries is unclear, the old town walls are the best place for clean exposures of the Middle Lias Moolstone (a ferruginous sand oolite limestone).

### Climate Change

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the parish.
- In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that South Somerset has higher per capita emissions in comparison to the South West of England and England as a whole since 2005.
- 42% of the district's carbon emissions are from transport, compared with 33% from domestic activities and 25% from industrial activities.
- Parts of the Neighbourhood Plan area are at significant risk of flooding. The areas at highest risk of fluvial flooding (Flood Zone 3) and surface water flooding in the Neighbourhood Plan area are those surrounding the three main watercourses: River Isle, Dowlish Brook and Shudrick Stream.
- The Flood Investigation Report for Ilminster confirms that 21 historic flood events occurred within the Neighbourhood Plan area between 1995-2017.
- The Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

## Landscape

- The nearest nationally protected landscape, the Blackdown Hills AONB, is located approximately 5 km to the west of the Neighbourhood Plan area.
- The Neighbourhood Plan area is within the Yeovil Scarplands NCA, with the NCA profile for listing several key characteristics defining the distinctiveness of the area.
- Somerset has been categorised into seven visual character regions, with the most recently completed landscape assessment for the county in October 1993 outlining strategies and guidelines for the protection, management and planning of the landscape.
- The Peripheral Landscape Study for Ilminster indicates several areas surrounding the town centre which have a 'low' or 'low to moderate' capacity to accommodate new development.
- South Somerset District Council have allocated several TPOs within the Neighbourhood Plan area in the interest of their amenity value.
- The views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

## Historic Environment

- The Neighbourhood Plan area has a rich historic environment.
- The Neighbourhood Plan area contains one Grade I, seven Grade II\* and 146 Grade II nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.
- It is currently not possible to determine whether the Grade II listed buildings within the Neighbourhood Plan area are at risk.
- The Ilminster Conservation Area was designated in 1973 and covers most of the town centre.
- Split into seven distinctive zones, the Conservation Area Appraisal completed in 2016 outlines the special interest and key characteristics of the Ilminster Conservation Area.
- Following a high-level review of the HER for Somerset, accessed via the Heritage Gateway, there are 268 records within Ilminster Parish which identify the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place.
- There are also several archaeological sites and areas across South Somerset including two that intersect with Ilminster, namely: Chard Canal, and the Taunton to Chard railway.

## Land, Soil and Water Resources

- There are several areas of Grade 2 and Grade 3a agricultural land surrounding Ilminster Town Centre which is land classified as the best and most versatile agricultural land.
- The areas of undeveloped land to the south east, south, west, and north west of the parish have a moderate likelihood (20-60%) of containing BMV land.
- The areas of undeveloped land to the north, north east, and east of the parish have a high likelihood (greater than 60%) of containing BMV land.
- The water resources located within and within proximity to the Neighbourhood Plan area includes the River Isle, Dowlish Brook and Shudrick Stream.
- There are no water quality assessments listed on the Environment Agency's Catchment Data Explorer for the Shudrick Stream.
- The 'reasons for not achieving good status' for the River Isle and Dowlish Brook are attributed to sewage discharge, poor soil management and poor livestock management.
- The Neighbourhood Plan area contains areas of land within the 'Building Stone' MSA, predominantly located directly to the north and the south of Ilminster Town Centre.

## Population and Community

- The population of Ilminster increased by approximately 27.0% between 2001 and 2011, greater than the average increases for South Somerset (6.8%), the South West of England (7.3%) and England (7.9%).
- There is a higher proportion of residents within the 60+ age category within the Neighbourhood Plan area (31.4%) in comparison to the proportions for South Somerset (29.2%), the South West of England (26.4%) and England (23.3%).
- 23.7% of residents in the Neighbourhood Plan area have no qualifications, higher than the totals for South Somerset (21.9%), the South West of England (20.7%) and the total for England (20.7%).
- The Neighbourhood Plan area has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the Parish's sense of identity.
- Residents have indicated that Ilminster needs more community facilities to support a growing population, particularly sport and recreational centres.

## Health and Wellbeing

- Key trends from Somerset's Joint Strategic Needs Assessment indicate an increasing ageing population and a prevalence of poor mental health and wellbeing in some locations.
- The Public Health Profile for Somerset estimates that the levels of excess weight in adults is worse than the national average.
- 80.7% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', lower than the total for South Somerset (81.4%), the South West of England (81.4%) and England (81.4%).
- 18.5% of residents in the Neighbourhood Plan area confirm that their activities are limited in some way. This is higher than the totals for South Somerset (18.2%), the South West of England (18.4%) and England (17.6%).

## Transportation

- The Neighbourhood Plan area is not connected to the national railway network. The closest railway station is in Taunton which is located approximately 14 km to the north west of Ilminster, which provides regular services to a range of destinations.
- The frequency of bus services is variable, with some running hourly during commuting hours (7am-7pm), and others only once per day on selective days.
- The B3168 is the main road passing through the town and is commonly used as a link between the A303 and the A378.
- 83.2% of households in the Neighbourhood Plan area have access to at least one car or van, lower than the total for South Somerset (85.3%) but higher than the totals for the South West of England (81.1%) and England (74.2%).
- The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (45.6%) which is higher than the totals for South Somerset (44.9%), the South West of England (41.4%) and England (37.0%).
- The total percentage of residents in the Neighbourhood Plan area choosing to catch a train, bus, minibus, coach, cycle, or walk to work is lower than the regional and national trends.

## SEA Framework

3.6 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the submission version of the Ilminster Neighbourhood Plan will be assessed consistently using the framework.

SEA Objective	Assessment questions
<b>Biodiversity and Geodiversity</b>	
Protect and enhance all biodiversity and geodiversity	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Support the integrity of the European designated sites located within proximity to the Neighbourhood Plan area?</li> <li>Support the status of the nationally and locally designated sites within and within proximity to the Neighbourhood Plan area?</li> <li>Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive?</li> <li>Achieve a net gain in biodiversity?</li> <li>Support enhancements to multifunctional green infrastructure networks, incorporating key ecological assets in the Neighbourhood Plan area such as the River Isle?</li> <li>Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
<b>Climate change</b>	
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Reduce the number of journeys made?</li> <li>Reduce the need to travel?</li> <li>Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>Generate energy from low or zero carbon sources?</li> <li>Reduce energy consumption from non-renewable resources?</li> </ul>
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change?</li> <li>Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> <li>Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>

<b>Landscape</b>	
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the natural beauty and special qualities of the Neighbourhood Plan area?</li> <li>• Conserve and enhance locally important landscape and townscape features within the Neighbourhood Plan area?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?</li> </ul>
<b>Historic Environment</b>	
Protect, conserve and enhance heritage assets within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the HER?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> <li>• Conserve and enhance archaeological remains, including historic landscapes?</li> <li>• Provide a positive strategy for the conservation and enhancement of the area's historic environment by guiding development proposals to address issues identified as threats to the character or appearance of the Ilminster Conservation Area?</li> <li>• Guide development proposals to secure remediation of issues identified as affecting the conservation area and prevent cumulative impacts?</li> </ul>
<b>Land, Soil and Water Resources</b>	
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land?</li> <li>• Protect the integrity of mineral safeguarding areas?</li> </ul>
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced?</li> <li>• Support the minimisation, reuse and recycling of waste?</li> <li>• Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>

<p>Use and manage water resources in a sustainable manner.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Minimise water consumption?</li> <li>• Protect surface water resources?</li> </ul>
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### Population and Community

<p>Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> </ul>
<p>Reduce deprivation and promote a more inclusive and self-contained community.</p>	<ul style="list-style-type: none"> <li>• Support the provision of land for allotments and cemeteries?</li> </ul>
<p>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul>

### Health and Wellbeing

<p>Improve the health and wellbeing residents within the Neighbourhood Plan area.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Address the key challenges identified in the JSNA?</li> <li>• Provide and enhance the provision of community access to green infrastructure in accordance with Accessible Natural Greenspace Standards?</li> <li>• Protect and enhance access to nature via greenspace and footpaths?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul>
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## Transportation

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Promote sustainable transport use and reduce the need to travel.

Will the option/proposal help to:

- Encourage modal shift to more sustainable forms of travel?
  - Facilitate working from home and remote working?
  - Improve road safety?
  - Reduce the impact on residents from the road network?
-

## 4. What has plan making / SEA involved up to this point?

### Introduction

- 4.1 In accordance with the SEA Regulations, the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the Ilminster Neighbourhood Plan has been informed by an assessment of alternative locations for development in the Neighbourhood Plan area.
- 4.3 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for development.

### Overview of plan making / SEA work undertaken since 2017

- 4.4 The Neighbourhood Plan area was formally designated by South Somerset District Council in June 2017.
- 4.5 Significant public consultation has been carried out since then to support the preparation of the Neighbourhood Plan. This has gathered local views and opinions, with a view to engaging local people throughout the Neighbourhood Plan's development process. This has included events, household questionnaires, meetings, open days, community surveys, and engagement through the Neighbourhood Plan website.

### Housing numbers to deliver through the Neighbourhood Plan

- 4.6 As discussed in **Chapter 2**, the Ilminster Neighbourhood Plan has been prepared in conjunction with the provisions of the South Somerset Local Plan 2006-2028 (adopted in March 2015), with due regard given to the emerging Local Plan review.
- 4.7 As part of the emerging South Somerset Local Plan 2016-2036, South Somerset District Council (SSDC) highlights that 839 dwellings should be delivered in Ilminster by 2036. As of November 2019, 119 dwellings had been completed or committed to. In addition, the application 16/05500/OUT at Land South of Canal Way has agreed 400 homes in principle subject to the agreement of a Section 106. Therefore, Ilminster has achieved a total provision of 519 dwellings, leaving a requirement of 320 dwellings in Ilminster.
- 4.8 To deliver this requirement, the Ilminster Neighbourhood Plan Steering Group were keen to consider through the evolution of the Neighbourhood Plan where new development should be delivered in the vicinity of the town. This was with a view to allocating sites for development through the Neighbourhood Plan to meet the requirement.

### Assessment of reasonable alternatives for site allocations

#### Neighbourhood Plan site assessment and initial shortlisting of sites

- 4.9 With a view to delivering the housing target provided by South Somerset District Council, the Neighbourhood Plan Steering Group sought to explore different options for locating new housing in the Neighbourhood Plan area. In light of this, an independent and objective assessment of the various sites available for development in the vicinity of the town was

undertaken on behalf of the Neighbourhood Plan Steering Group in 2019 and early 2020.<sup>12</sup>

This considered sites which had been previously considered through the Housing and Economic Land Availability Assessment (HELAA) completed for the South Somerset Local Plan Review<sup>13</sup> and sites which were put forward through a local 'call for sites' process<sup>14</sup>.

- 4.10 To support the consideration of the suitability of the sites for a potential allocation of a type appropriate for the Neighbourhood Plan, the Neighbourhood Plan site assessment process appraised sites against a range of criteria relating to suitability, availability and achievability.
- 4.11 Subsequent to this process, 19 of the sites were shortlisted as being appropriate for further consideration as potential allocations for the Neighbourhood Plan (**Table 4.1** below). The remaining sites were considered inappropriate to take forward for the purposes of the Neighbourhood Plan due to the following reasons:
- Sites had gained planning permission
  - Sites were no longer available.

**Table 4.1: Sites taken forward for further consideration through the SEA process**

Site ID. <sup>15</sup>	Name of site, address	Size (Ha) <sup>16</sup>	Identified site capacities <sup>17</sup>
12	Land Rear of New Wood House	2.0	48
13	Land South of Cross	2.4	57
14	Land North of Cross	1.0	24
15	Land South of Shudrick Lane	34.2	220
16	Former Horlicks Site, South of Station Road	11.0	N/A <sup>18</sup>
17	Greenway Farm, West of Listers Hill	2.4	44
18	Bay Hill	2.4	44
20	Land South of Beacon Lane	3.8	41
21	Land to East of Old Orchard	3.8	69
22	Land to East of Winterhay Lane and Old Dairy	3.3	59
23	The Swan Yard	0.1	2
24	Gooche and Housego, Land Rear of the Market House	1.0	14
25	Land North of Station Road	4.8	88
26	Land East of Playing Fields, Shudrick Lane	1.2	29
27	Land to Rear of Blackdown View	6.6	119
28	Land East of Winterhay Lane	5.5	99
29	Land off Canal Way Phase 2	13.0	94
31	Land to East of Greenway, Listers Hill	1.8	44
32	Land to East of Greenway (Larger Site)	17.0	306

<sup>12</sup> ECA on behalf of Ilminster Town Council (March 2020) Ilminster Neighbourhood Plan Site Assessment Report

<sup>13</sup> South Somerset District Council (2020): 'HELAA' [online] accessible via: <https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/local-plan-review-2016-2036/>

<sup>14</sup> The site assessment report accompanies the Neighbourhood Plan at Regulation 14 consultation.

<sup>15</sup> Site IDs have been taken from the site assessment report completed by an independent planning consultancy on behalf of the Neighbourhood Plan Steering Group, and forms part of the evidence base of the emerging Neighbourhood Plan.

<sup>16</sup> Represents total site size and not necessarily total developable area.

<sup>17</sup> Capacities have been taken from the site assessment report. They are intended for comparative purposes only and represent the total number of dwellings which could be delivered across the whole site. For several sites, the indicative number might not be achievable due to the presence of on-site constraints.

<sup>18</sup> The site is identified for employment use.

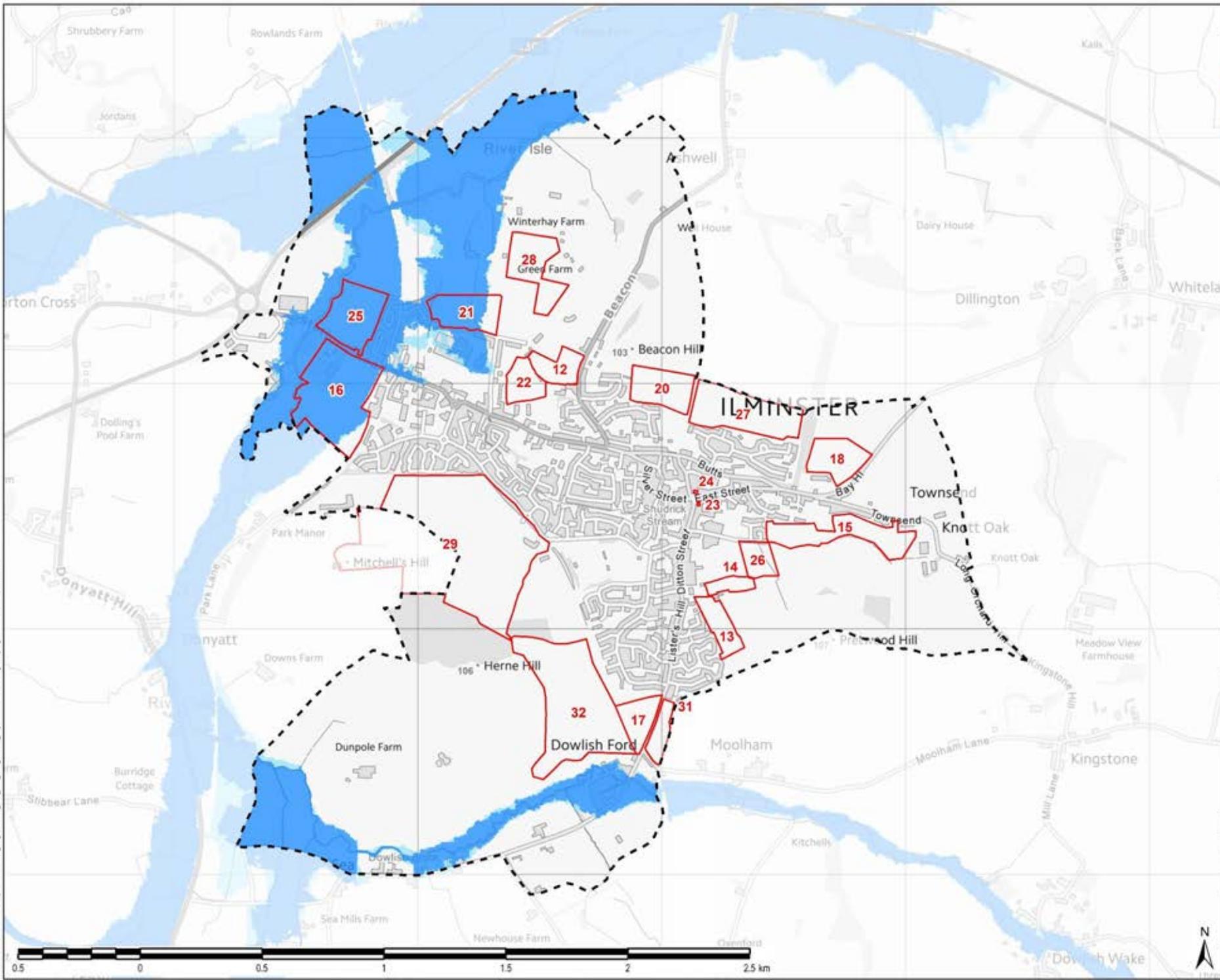
## Assessment of shortlisted sites through the SEA process

- 4.12 To support the consideration of the suitability of the shortlisted sites for a potential allocation of a type appropriate for the Neighbourhood Plan, the SEA process has appraised the key constraints and opportunities present at each of the 19 sites.
- 4.13 In this context, the sites have been considered in relation to the SEA Framework of objectives and decision-making questions developed during SEA scoping (**Chapter 3**) and the baseline information. This SEA site assessment was undertaken separately to the site assessment undertaken on behalf of the Ilminster Neighbourhood Plan Steering Group, and the findings of the appraisal were fed back to the Neighbourhood Plan Steering Group in late 2020.
- 4.14 Sources of information to support the site appraisal process has included (amongst others): OS Maps, MAGIC Interactive Map, Flood Risk Maps for England, Regional Agricultural Land Classification maps, reports and interactive mapping layers available on South Somerset District Council's webpages, Somerset's Historic Environment Record, and the Peripheral Landscape Study for South Somerset. These sources are referenced within the baseline information presented in **Appendix A** of this Environmental Report.
- 4.15 The locations of the 19 sites assessed through the SEA process are presented in **Figure 4.1** (overleaf). **Figures 4.2 to 4.5** which follow present some of the key environmental constraints within proximity to the sites. **Tables 4.2 to 4.20** which follow present the findings of the assessment and provide an indication of each site's sustainability performance in relation to the eight SEA themes.









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**LEGEND**

- Ilminster Neighbourhood Plan Area
- Site Option
- Flood Zone 2
- Flood Zone 3

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Purpose of Issue  
**FINAL**

Client  
**ILMINSTER NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title  
**STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE ILMINSTER NEIGHBOURHOOD PLAN**

Drawing Title  
**FLOOD RISK ZONES**

Drawn By	Checked By	Approved By	Date
			29/11/2020

ACCOM Internal Project No. 60571067 Scale 1:20,000

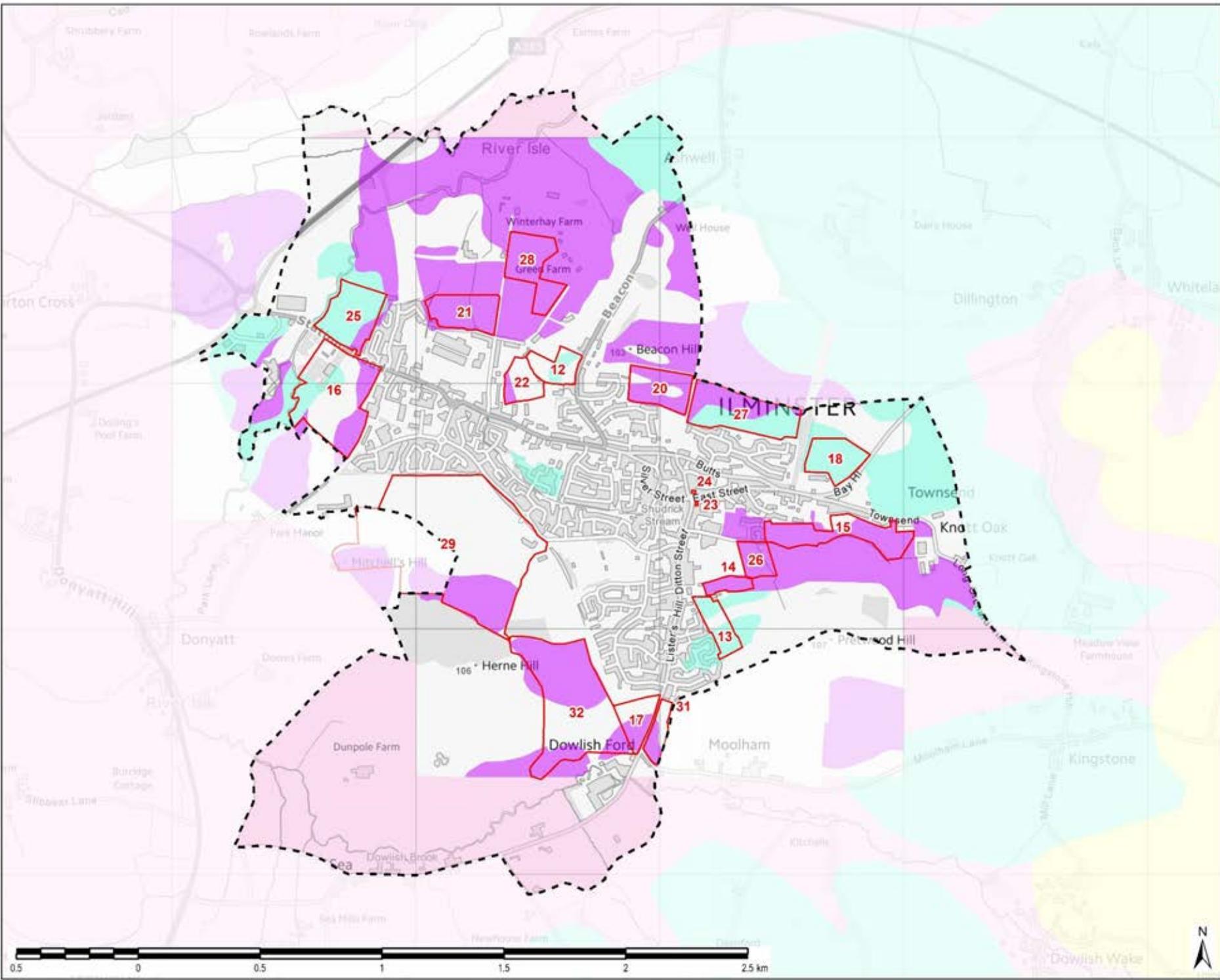
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Drawing Number  
**FIGURE 4.4**

Rev  
**01**

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**LEGEND**

- Ilminster Neighbourhood Plan Area
- Site Option

**Agricultural Land Classification**

- Grade 1
- Grade 2
- Grade 3
- Grade 3a

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Purpose of Issue: **FINAL**

Client: **ILMINSTER NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title: **STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE ILMINSTER NEIGHBOURHOOD PLAN**

Drawing Title: **BEST AND MOST VERSATILE AGRICULTURAL LAND**

Drawn CN	Checked SP	Approved SP	Date 26/11/2020
AECOM Internal Project No: 60571087		Scale @ A4 1:20,000	

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Project: 60571087  
Location: 1021 100  
Region: 09100-1000  
File: 09100-1000  
Drawing Number: **FIGURE 4.5**

Rev: **01**

File Name: C:\0006 - Ilminster Neighbourhood Plan - Agricultural Land - Best and Most Versatile Agricultural Land.mxd

## SEA site assessment findings

Table 4.2

SEA theme	Commentary, 12: Land Rear of New Wood House
	
	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. The site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there no Biodiversity Action Plan (BAP) Priority Habitats within the site. However, there are trees and hedgerows located along the site boundaries and an area of traditional orchard BAP Priority Habitat directly to the west of the site. These features would need to be retained and enhanced (where appropriate) within new development areas, alongside the delivery of net gains.</p>
	Climate Change
Landscape	<p>The site is not within or within proximity to a National Park, Area of Outstanding Natural Beauty (AONB) or any Green Belt land.</p> <p>An allocation at this location would result in the loss of greenfield land. Although the site is adjacent to the existing settlement boundary, it slopes upwards towards Beacon Hill (to the east) and is prominent in its setting in the landscape. The Peripheral Landscape Study for Ilminster indicates that the site has a 'low' to 'moderate-low' capacity to accommodate new development areas.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with tree preservation order (TPO) designations.</p> <p>In terms of visual impacts, locally identified viewpoint two within the Neighbourhood Plan area is located at the north eastern corner of the site. However, the sightline for the viewpoint extends to the north west towards the River Isle (away from the site). Therefore, new development within the site is not likely to detract from the character of this particular view.</p>

SEA theme	Commentary, 12: Land Rear of New Wood House	
Historic Environment	<p>The site is located adjacent to the Iminster Conservation Area, which is situated to the south. The section of the conservation area adjoining the site has been defined by the Conservation Area Appraisal as part of the New Road character area. The site is relatively screened from much of the conservation area (in part due to topography), so impacts from development on the site would be on the immediate area rather than the wider conservation area. However, the loss of open areas in this location would impact on views to and from the conservation area, in particular from properties on The Beacon. In this respect, the Conservation Area Appraisal identifies views north west from The Beacon across the Isle valley as a key view.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>According to the Historic Environment Record, the site is located adjacent to the site of a turnpike road of the Iminster Trust, turnpiked in 1759 as part of the Curry Rivel-Iminster-Chard road. Development on the site is however unlikely to affect the archaeological potential of this route.</p>	
Land, Soil and Water Resources	<p>A detailed agricultural land classification (ALC) assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, there is a corridor of Grade 2 agricultural land passing through the central section of the site which is some of the best and most versatile (BMV) land for agricultural purposes. The remaining areas of the site comprise Grade 3b or Grade 4 land (i.e. not BMV for agricultural purposes).</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a nitrate vulnerable zone (NVZ) or a groundwater source protection zone (SPZ).</p> <p>The site could potentially overlap with the Building Stone Mineral Safeguarding Area (MSA). However, it is difficult to be certain due to the scale of Map Eight presented within the Somerset Minerals Plan.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative proximity to services and facilities in Iminster town centre (c.800m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Iminster Medical Centre at Canal Way, which is located approximately 1km away.</p> <p>The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network via the footpath which passes through the site.</p>	
Transportation	<p>With reference to local public transport networks, the site is adjacent to bus stops located to the east along the B3168 (Beacon). Regarding the local public rights of way (PRoW) network, there is a footpath passing through the western section of the site. The footpath extends south eastwards from Winterhay Lane and connects to the B3168 (New Road). It is anticipated that the footpath could be retained through new development areas.</p> <p>The site is located approximately 800m to the north west of Iminster town centre, which will limit the need for residents to travel for many day-to-day services and facilities.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.3

SEA theme	Commentary, 13: Land South of Cross
Biodiversity and Geodiversity	 <p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. The site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site boundaries. There are hedgerows located along the site boundaries. These natural assets contribute to local ecological networks within the landscape and would need to be retained and enhanced (where appropriate) through new development areas, alongside the delivery of net gains.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is in relatively good proximity to the services and facilities in IIminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the site is within Flood Zone 1 and has a very low surface water flood risk.</p>
Landscape	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>An allocation at this location would result in the loss of greenfield land. Although the site is adjacent to the existing settlement boundary, it slopes upwards towards Pretwood Hill (to the south east) and has an elevated setting within the landscape. The Peripheral Landscape Study for IIminster indicates that the southern section of the site has a 'low' capacity to accommodate new development. The central and northern sections of the site have a 'moderate' to 'moderate-high' capacity to accommodate new development.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, the site is within the sightline of two locally identified viewpoints from within the town (from High Street), specifically viewpoints six and eight. However, given the relative distance of the site from the viewpoints (approximately 750m to the south) and its proximity to the settlement, an allocation at this location is less likely to significantly change the character of either viewpoint.</p>

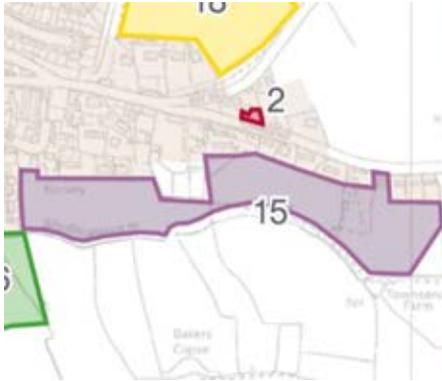
SEA theme	Commentary, 13: Land South of Cross	
Historic Environment	<p>The site is located approximately 130m south of the part of the Iminster Conservation Area located on Ditton Street. However, the site is screened from this part of the Conservation Area by intermediate development. Given sloping topography, development on the site has the potential to be visible from other parts of the conservation area, including on Love Lane and Townsend; however the significance of the impact is likely to be limited given existing screening and the distance to the site from the conservation area (c.500m).</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>The site has archaeological potential. According to the Historic Environment Record, an evaluation undertaken in 2014 recorded several ditches and pits containing mid/late iron age pottery with some possible early iron age pottery. The presence of the pit may indicate settlement. The find has been recorded as: "32652: Iron age settlement, E of Ditton Street, Iminster".</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, the northern and southern sections of the site are underlain by Grade 2 land which is some of the best and most versatile land for agricultural purposes. The central area of the site comprises Grade 3b land (i.e. not BMV for agricultural purposes).</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located with very good access to services and facilities in Iminster town centre (c.500m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Iminster Medical Centre at Canal Way, which is located approximately 850m away.</p> <p>The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network.</p>	
Transportation	<p>With reference to local public transport networks, there are bus stops located approximately 100m to the west and north west of the site along Listers Hill and Ditton Street. Regarding the local PRow network, there are no footpaths passing through the site.</p> <p>The site is located approximately 500m walk to Iminster town centre, which will limit the need for residents to travel for most day-to-day services and facilities.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.4

SEA theme	Commentary, 14: Land North of Cross
Biodiversity and Geodiversity	<p>Ecologically, an allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, there are trees and hedgerows located along the site boundaries. These features would need to be retained and enhanced (where appropriate) within new development areas, alongside the delivery of net gains.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is in relatively good proximity to the services and facilities in IIminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions)</p> <p>With reference to flood risk issues, the site is within Flood Zone 1 and has a very low surface water flood risk.</p>
Landscape	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>Although the site is relatively flat and is adjacent to the existing settlement boundary, an allocation at this location would result in the loss of greenfield land. However, the Peripheral Landscape Study for IIminster indicates that the site has a 'moderate-high' capacity to accommodate new development.</p> <p>There is a significant tree at the south eastern corner of the site which has a TPO designation. It is anticipated that this locally important landscape feature could be retained within new development areas.</p> <p>In terms of visual impacts, the site is within the sightline of two locally identified viewpoints from within the town (from High Street), specifically viewpoints six and eight. However, given the relative distance of the site from the viewpoints (approximately 500m to the south) and its proximity to the settlement, an allocation at this location is less likely to significantly change the character of either viewpoint.</p>

SEA theme	Commentary, 14: Land North of Cross	
Historic Environment	<p>The site is located approximately 100m south east of the part of the Iminster Conservation Area located on Ditton Street. However, the site is screened from this part of the Conservation Area by intermediate development. Development on the site however has the potential to be visible from other parts of the conservation area, including on Love Lane and Townsend; however the significance of the impact is likely to be limited given existing screening and the distance to the site from the conservation area (c.500m).</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>No significant features are listed on the Historic Environment Record. As highlighted by the HER, a geophysical survey was undertaken in 2014 (which also included Site 14 above), and only one feature of archaeological significance was recorded across the sites; an enclosure of unknown date.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, the whole of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located with good access to services and facilities in Iminster town centre (c.500m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Iminster Medical Centre at Canal Way, which is located approximately 850m away.</p> <p>The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network.</p>	
Transportation	<p>With reference to local public transport networks, the site is adjacent to bus stops located to the west along Ditton Street. Regarding the local PRoW network, there are no footpaths passing through the site.</p> <p>The site is located approximately 500m to the south of Iminster town centre, which will limit the need for residents to travel for most day-to-day services and facilities.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.5

SEA theme	Commentary, 15: Land South of Shudrick Lane
	
<p>Biodiversity and Geodiversity</p>	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site boundaries. Adjoining the site, there are corridors of trees and hedgerows located along the site boundaries and an area of traditional orchard BAP Priority Habitat located directly to the east. Additionally, Shudrick Stream passes alongside the southern site boundary. These natural assets contribute to local ecological networks within the landscape and would need to be retained and enhanced (where appropriate) through new development areas alongside the delivery of net gains.</p>
<p>Climate Change</p>	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is relatively good proximity to the services and facilities in Iliminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>With reference to fluvial flood risk issues, the whole of the site is within Flood Zone 1. Most of the site has a very low surface water flood risk. However, there are corridors of land in the southern section of the site (adjacent to Shudrick Stream) which have a medium to high surface water flood risk. Impacts are dependent on the extent to which surface water issues are mitigated through new development areas, including through incorporating sustainable drainage techniques and natural features into the design.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>Although most of the site is relatively flat and adjacent to the existing settlement boundary, an allocation at this location would result in the loss of greenfield land. However, the Peripheral Landscape Study for Iliminster indicates that most of the site has a 'high' capacity to accommodate new development. Land towards the eastern site boundary is identified as having a 'moderate' capacity to accommodate new development.</p> <p>There is a significant tree along the southern site boundary (adjacent to Shudrick Stream) which has a TPO designation. It is anticipated that this locally important landscape feature could be retained within new development areas.</p> <p>In terms of visual impacts, there are direct views into the eastern half of the site from two locally identified viewpoints within the town (from Townsend), specifically viewpoints ten and eleven. In this respect, new development within the fields in the eastern half of the site is likely to detract from the rural character of both viewpoints. An allocation within the western half of the site is less likely to impact upon any locally identified viewpoints.</p>

SEA theme	Commentary, 15: Land South of Shudrick Lane	
Historic Environment	<p>Development of the site has the potential to have significant negative effects on the setting of the area's rich historic environment resource.</p> <p>The site is located adjacent to the Ilminster Conservation Area, with the north western and central part of the site adjoining the conservation area. The section of the conservation area located adjacent to the north west of the site is identified as part of the Love Lane sub-area defined by the Ilminster Conservation Area Appraisal. As stated in the Conservation Area Appraisal "There are views out over the open land of the Shudrick valley, the rising ground and strong skyline of Pretwood Hill from many points in this sub-area". The central part of the site adjoins the Butts, Bay Hill and Townsend sub-area of the conservation area. The Conservation Area Appraisal highlights that there are extensive views across Shudrick valley to Pretwood Hill "from many of the buildings and from the streets between buildings on south side" of the sub-area. As such, development of this site has the potential to have significant effects on these key views from the conservation area.</p> <p>The site is within the setting of the Grade II listed '17, Love Lane', the Grade II listed 'Cottage to the Rear of No 14', located on Townsend, and the Grade II listed '22, Townsend', which are all located directly to the north of the site.</p> <p>No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>No significant features are listed on the Historic Environment Record. As highlighted by the HER, a geophysical survey was undertaken in 2014 (which also included Site 14 above), and only one feature of archaeological significance was recorded across the sites; an enclosure of unknown date.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Ilminster town. In this respect, most of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, Shudrick Stream passes alongside the southern site boundary. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located with very good access to services and facilities in Ilminster town centre (c.400-750m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>Ilminster Medical Centre at Canal Way is located approximately 1.1km from the site.</p> <p>The site is accessible to the PRow network and the town's wider green infrastructure network, including the network to the north east of the town.</p>	
Transportation	<p>With reference to local public transport networks, the nearest bus stops are located approximately 250m to the north west of the site within Ilminster town centre. Regarding the local PRow network, there are no footpaths passing through the site.</p> <p>Given its size, the site is located between 450m and 750m walk to the east of Ilminster town centre. This will limit the need for residents to travel for most day-to-day services and facilities.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.6

SEA theme	Commentary, 16: Former Horlicks Site, South of Station Road
	
<p>Biodiversity and Geodiversity</p>	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, there are trees and hedgerows located along the site boundaries and within the north western section of the site. These features would need to be retained and enhanced (where appropriate) within new development areas alongside the delivery of net gains.</p>
<p>Climate Change</p>	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is approximately 1km to the west of IIminster town centre. In this respect, an allocation at this location is perhaps less likely to reduce the need to travel by car for accessing day-to-day services and facilities (and associated greenhouse gas emissions).</p> <p>Flood risk is a significant constraint for the site. The River Isle flows approximately 100m to the west of the site. Most of the site overlaps with areas of land within Flood Zone 2 and Flood Zone 3. Most of the eastern half of the site has a medium to high surface water flood risk.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>The Peripheral Landscape Study for IIminster concludes that the site has a 'landscape with development potential providing flood risk is alleviated'. Given the size of the site, an allocation of the whole site area would though significantly extend the town to the west.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, the site is within the sightline of locally identified viewpoint three from within the town (from Station Road). However, given the relatively flat topography of the settlement at this location and the distance of the site from the viewpoint (approximately 300m to the south west), an allocation at this location is less likely to significantly change the character of the viewpoint.</p>

SEA theme	Commentary, 16: Former Horlicks Site, South of Station Road	
Historic Environment	<p>The site is not within the setting of the IIminster Conservation Area.</p> <p>The site is within the setting of the Grade II listed 'Old Toll House and Attached Railings', which is located on the opposite site of Station Road. The site is however currently screened by trees. The Grade II listed 'Former Great Western Railway Station' is located 75m to the south east of the site, and is visible between existing buildings. The buildings are however associated with employment land, which detract from the setting of the listed structure.</p> <p>No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>The site has significant archaeological potential. The HER highlights that an archaeological evaluation of land at Hort Bridge undertaken in 2009 located a number of features indicative of late bronze age occupation, including spreads of burnt flint deposits, perhaps indicative of activities associated with 'burnt mounds.'</p> <p>The following feature has also been identified on the HER for the site: "53331: Deerpark, E of Donyatt." This relates to a former deerpark covering the site, which was potentially in use between the C14th and C17th.</p> <p>The HER also identifies Station Road (bordering the site to the north) as the route of an 18<sup>th</sup> century turnpike road.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding IIminster town. In this respect, there are corridors of BMV land within the south western section of the site (Grade 2) and along the eastern boundary of the site (Grade 3a). The remaining areas of the site comprise Grade 3b land (i.e. not BMV for agricultural purposes).</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The River Isle is approximately 100m to the west. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative distance to the services and facilities in IIminster town centre (c.1.6km walk to the Market House) which will increase the need for residents to travel for the amenities provided here. The site is however located on bus routes along Station Road, although services are relatively infrequent.</p>	
Health and Wellbeing	<p>The site is approximately 1.1km from IIminster Medical Centre at Canal Way.</p> <p>The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network, including the network to the south west of the town.</p>	
Transportation	<p>With reference to local public transport networks, the site is adjacent to bus stops located to the north along Station Road. Regarding the local PRoW network, there are no footpaths passing through the site.</p> <p>The site is approximately 1.1km to the west of IIminster town centre. In this respect, an allocation at this location is perhaps less likely to reduce the need to travel by car for accessing day-to-day services and facilities.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.7

SEA theme	Commentary, 17: Greenway Farm, West of Listers Hill
<p>Biodiversity and Geodiversity</p>	 <p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, there are corridors of trees and hedgerows located along the site boundaries. These natural assets contribute to local ecological networks within the landscape and would need to be retained and enhanced (where appropriate) through new development areas alongside the delivery of net gains.</p>
	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is approximately 1km to the south of Ilminster town centre. In this respect, an allocation at this location is less likely to reduce the need to travel by car for accessing day-to-day services and facilities (and associated greenhouse gas emissions).</p> <p>The site has a low fluvial flood risk potential and is wholly located within Flood Zone 1. However, there is a corridor of land located approximately 50m to the south of the site (adjacent to Dowlish Brook) which is within Flood Zone 2 and Flood Zone 3. Additionally, there are areas of land within the southern half of the site and along the western site boundary which have a medium to high surface water flood risk.</p>
	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>An allocation at this location would result in the loss of greenfield land. An allocation of the whole site area would remove one of the fields contributing to a green gap between Ilminster town and neighbouring properties at Dowlish Ford and Moolham.</p> <p>The Peripheral Landscape Study for Ilminster indicates that the northern half of the site has a 'moderate-low' capacity to accommodate new development. The southern half of the site is identified as having a 'moderate' capacity to accommodate new development.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within Ilminster.</p>

SEA theme	Commentary, 17: Greenway Farm, West of Listers Hill	
Historic Environment	<p>The site is not within the setting of the Iminster Conservation Area. No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>Listers Hill on the eastern boundary of the site is identified by the HER as the route of an C18th turnpike road, “Iminster to Sea Bridge, Donyatt” which was a turnpike road of the Iminster Trust turnpiked in 1759. The western boundary of the site is the site of the Chard Canal, which linked Chard and Iminster with the Taunton and Bridgewater Canal. It was closed in 1867. Development on the site is however unlikely to affect the archaeological potential of these routes.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, the southern half of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes. The northern half of the site comprises Grade 3b land (i.e. not BMV for agricultural purposes).</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. Dowlish Brook is approximately 50m to the south. The site does not overlap with a NVZ or SPZ.</p> <p>The site could potentially overlap with the Building Stone MSA. However, it is difficult to be certain due to the scale of Map Eight presented within the Somerset Minerals Plan.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative proximity to services and facilities in Iminster town centre (c.900m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>Iminster Medical Centre at Canal Way is located approximately 1.2km away. The site is accessible to the Public Rights of Way network and the town’s wider green infrastructure network, including the network to the south of the town.</p>	
Transportation	<p>With reference to local public transport networks, there are bus stops located approximately 100m to the north east of the site along Listers Hill. Regarding the PRow network, there are no footpaths passing through the site.</p> <p>The site is approximately 900m to the south of Iminster town centre.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.8

SEA theme	Commentary, 18: Bay Hill
Biodiversity and Geodiversity	 <p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site boundaries. Adjoining the site, there is a corridor of trees located immediately to the west which connect to an area of deciduous woodland BAP Priority Habitat. These natural assets contribute to local ecological networks within the landscape and would need to be retained and enhanced (where appropriate) through new development areas alongside the delivery of net gains.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is in relatively good proximity to the services and facilities in IIminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1 and has a low to very low surface water flood risk.</p>
Landscape	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>An allocation at this location would result in the loss of greenfield land. Although the site is adjacent to the existing settlement boundary, it slopes upwards towards Beacon Hill (to the north west) and has a relatively elevated setting within the landscape. The Peripheral Landscape Study for IIminster indicates that the site has a 'moderate-low' capacity to accommodate new development. With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within IIminster.</p>
Historic Environment	<p>The site is located adjacent to the IIminster Conservation Area, which is situated to the west and the south.</p> <p>The western edge of the site adjoins the Butts, Bay Hill and Townsend sub-area of the conservation area, and specifically the approach to Dillington Park estate.</p>

SEA theme	Commentary, 18: Bay Hill	
Historic Environment (continued)	<p>The straight drive leads north and is enclosed by strong tree belts each side. Whilst the existing tree belts provide screening from the site, there would be impacts from development on views to and from the driveway corridor.</p> <p>The southern edge of the site adjoins a different part of the Butts, Bay Hill and Townsend sub-area. Whilst the site is elevated from Bay Hill, which limits immediate direct views into the conservation area, it slopes upwards, and there is some visibility from parts of the conservation area to the south. Two Grade II listed buildings are present on Bay Hill, 'Toll House' and '13, Bay Hill'. Whilst the site is elevated from the road (and as such from the listed buildings), reducing its visibility, there would potentially be some visibility from these features to and from new development on the site, depending on where on the site development takes place, and layout.</p> <p>According to the HER, the western boundary of the site (comprising the area covered by the conservation area) comprises part of the Dillington and Whitelackington Landscape Park. In this context a landscape survey undertaken in 2005 identified three phases in the development of a designed landscape centred on Dillington House. A Stuart deer park and garden was developed around the house in c1620, followed by the creation of a landscape park between 1767 and 1771. Remodelling of this was then undertaken from 1837. In addition, the HER identifies several tetrahedral WWII anti-tank obstacles on the south drive to Dillington House (although these are located beyond the boundary of the site).</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, the whole of the site is underlain by Grade 2 land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The site could potentially overlap with the Building Stone MSA. However, it is difficult to be certain due to the scale of Map Eight presented within the Somerset Minerals Plan.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located with good access to services and facilities in Iminster town centre (c.550m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>Iminster Medical Centre at Canal Way is located approximately 1.4km away.</p> <p>The site has good access to the Public Rights of Way network and the town's wider green infrastructure network. This includes to the South Somerset Cycle Route which follows the approach to Dillington Park estate.</p>	
Transportation	<p>The site is approximately 550m to the east of Iminster town centre, which will limit the need for residents to travel for most day-to-day services and facilities.</p> <p>With reference to local public transport networks, the nearest bus stops are located within Iminster town centre. Regarding the local PRoW network, there is a track passing alongside the western site boundary which extends southwards into the town centre (via East Street).</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.9

SEA theme	Commentary, 20: Land South of Beacon Lane
	
<p>Biodiversity and Geodiversity</p>	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, there are trees and hedgerows located along the site boundaries. These features would need to be retained and enhanced (where appropriate) within new development areas alongside the delivery of net gains.</p>
<p>Climate Change</p>	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is in relatively good proximity to the services and facilities in IIminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1 and has a very low surface water flood risk.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>An allocation at this location would result in the loss of greenfield land. Although the site is adjacent to the existing settlement boundary, it slopes upwards towards the key landscape feature of Beacon Hill (to the north) and has an elevated setting in the landscape. The Peripheral Landscape Study for IIminster indicates that the site has a 'low' to 'moderate-low' capacity to accommodate new development.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within IIminster.</p>

SEA theme	Commentary, 20: Land South of Beacon Lane	
Historic Environment	<p>The site is located approximately 100m north of the Imlinster Conservation Area. Given the sloping nature of the topography from north to south, and existing screening from vegetation and existing development, significant effects on the setting of the conservation area are unlikely.</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>No features listed on the Historic Environment Record are located on or adjacent to the site.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Imlinster town. In this respect, most of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The site could potentially overlap with the Building Stone MSA. However, it is difficult to be certain due to the scale of Map Eight presented within the Somerset Minerals Plan.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located with good access to services and facilities in Imlinster town centre (c.750m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>The site is located 1km from Imlinster Medical Centre on Canal Way.</p> <p>The site has good access to the Public Rights of Way network and the town's wider green infrastructure network, including via the footpaths located on the northern and eastern boundaries of the site.</p>	
Transportation	<p>The site is located approximately 750m walk to the north of Imlinster town centre (at its nearest point), which will limit the need for residents to travel for many day-to-day services and facilities.</p> <p>With reference to local public transport networks, the nearest bus stops are located approximately 150m to the south of the site along High Street. Regarding the local PRow network, there are footpaths passing alongside the northern and eastern site boundaries. The footpaths connect High Street with Beacon Hill (via the allotment gardens and Beacon Lane).</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.10

SEA theme	Commentary, 21: Land to East of Old Orchard
Biodiversity and Geodiversity	 <p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, there hedgerows located along the site boundaries and a cluster of trees within the southern section of the site. Additionally, there are two streams passing through the site. These features would need to be retained and enhanced (where appropriate) within new development areas alongside the delivery of net gains.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is approximately 1.4km to the north west of IIminster town centre. In this respect, an allocation at this is less likely to reduce the need to travel by car for accessing day-to-day services and facilities (and associated greenhouse gas emissions).</p> <p>There are two streams passing through the site (including Shudrick Stream) which are tributaries of the River Isle. With reference to fluvial flood risk issues, most of the site is within Flood Zone 2 and Flood Zone 3. Additionally, the western half of the site contains areas of low, medium and high surface water flood risk. However, the area of the site to the east of Shudrick Stream is within Flood Zone 1 and has a very low surface water flood risk.</p>
Landscape	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>Although the site is relatively flat and is adjacent to the existing settlement boundary, an allocation at this location would result in the loss of greenfield land. However, the Peripheral Landscape Study for IIminster indicates that the site has a 'high' capacity to accommodate new development providing flood risk is alleviated.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within IIminster.</p>

SEA theme	Commentary, 21: Land to East of Old Orchard	
Historic Environment	<p>The site is not within the setting of the Iminster Conservation Area.</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>The western boundary of the site is the site of the Chard Canal, which linked Chard and Iminster with the Taunton and Bridgewater Canal. It was closed in 1867. Development on the site is however unlikely to affect the archaeological potential of this route. The HER highlights that the site of a WWII anti-tank island is located on Winterhay Lane on the eastern boundary of the site.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, the whole of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, there are two streams passing through the site (including Shudrick Stream) which are tributaries of the River Isle. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative distance to the services and facilities in Iminster town centre (c.1.4km walk to the Market House) which will increase the need for residents to travel for the amenities provided here. The site is not located on bus routes. This raises some accessibility issues.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Iminster Medical Centre at Canal Way, which is located approximately 950m away.</p> <p>The site has good access to the Public Rights of Way network and the town's wider green infrastructure network, including via the footpath present on the northern boundary of the site.</p>	
Transportation	<p>With reference to local public transport networks, the nearest bus stops are located approximately 250m to the south of the site along Station Road. Regarding the local PRow network, there is a footpath passing alongside the northern site boundary which connects to Winterhay Lane. Winterhay Lane provides pedestrian connectivity to the bus stops along Station Road.</p> <p>The site is approximately 1.4km walk to Iminster town centre. In this respect, an allocation at this is perhaps less likely to reduce the need to travel by car for accessing day-to-day services and facilities.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.11

SEA theme	Commentary, 22: Land to East of Winterhay Lane and Old Dairy
Biodiversity and Geodiversity	 <p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there is an area of traditional orchard BAP Priority Habitat within the northern half of the site. There are also trees and hedgerows located within and along the site boundaries which contribute to local ecological networks. These features would need to be retained and enhanced (where appropriate) within new development areas alongside the delivery of net gains.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is in relatively good proximity to the services and facilities in Ilminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1 and has a low to very low surface water flood risk.</p>
Landscape	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>Although the site is adjacent to the settlement boundary, an allocation at this location would result in the loss of greenfield land. The Peripheral Landscape Study for Ilminster indicates that the eastern half of the site has a 'low' to 'moderate-low' capacity to accommodate new development. The western half the site has a lower elevation in the landscape. In this respect, the Study concludes that the western half of the site has a 'moderate' capacity to accommodate new development.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within Ilminster.</p>

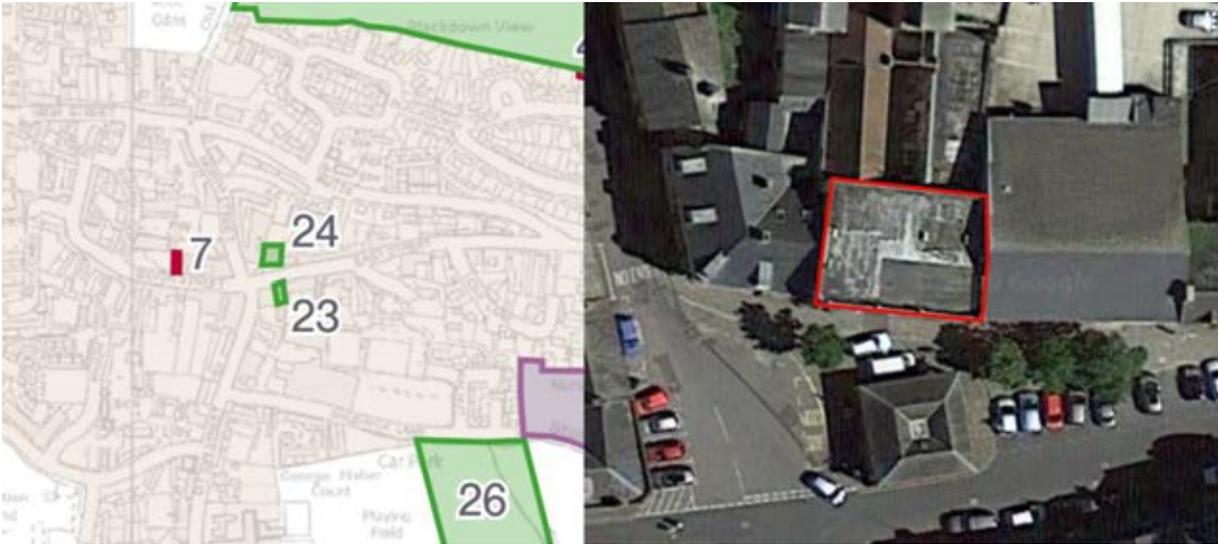
SEA theme	Commentary, 22: Land to East of Winterhay Lane and Old Dairy	
Historic Environment	<p>The site is located adjacent to the Iminster Conservation Area, which adjoins the south eastern part of the site. The section of the conservation area adjoining the site has been defined by the Conservation Area Appraisal as being part of the New Road character area. However, the site is screened from the conservation area by trees, so impacts from development on the site would be on the immediate location rather than the wider conservation area.</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>According the HER, the site of a 1920s creamery is present on the western boundary of the site, between the site and Winterhay Lane.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, land within the south western section of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes. Most of the site comprises either Grade 3b or Grade 4 land (i.e. not BMV for agricultural purposes).</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA. Land to the east of the site potentially overlaps with the Building Stone MSA. However, it is difficult to be certain given the scale of Map Eight within the Somerset Minerals Plan.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative proximity to services and facilities in Iminster town centre (c.950m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>The site is accessible to Iminster Medical Centre at Canal Way, which is located approximately 750m away.</p> <p>The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network.</p>	
Transportation	<p>With reference to local public transport networks, the nearest bus stops are located approximately 100m to the south west of the site along Station Road. Regarding the local PRow network, there are no footpaths passing through the site.</p> <p>The site is located approximately 950m walk to Iminster town centre (at its nearest point).</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.12

SEA theme	Commentary, 23: The Swan Yard
	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site boundaries. The site comprises areas of hardstanding and contains few features of ecological value.</p>
<p>Climate Change</p>	<p>The site is within IIminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1 and has a very low surface water flood risk.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>The site is an area of underutilised brownfield land within the settlement boundary and is surrounded by existing buildings.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within IIminster.</p>
<p>Historic Environment</p>	<p>The site is located within the IIminster Conservation Area. It is located in the Market Place, Cornhill, East and North Street sub-area defined in the Conservation Area Appraisal.</p> <p>The site is adjacent to three Grade II listed buildings: '2, East Street'; '8, East Street' (both of which are located to the north); and '1, Ditton Street'.</p> <p>Given the site is in the immediate setting of these buildings within the conservation area, and the site is currently an open area, development at this location has the potential to have significant effects on the settings of these features of historic environment interest.</p>

SEA theme	Commentary, 23: The Swan Yard	
Land, Soil and Water Resources	<p>The site is an area of brownfield land within the settlement boundary. Therefore, an allocation at this location will support the efficient use of previously developed land within the Neighbourhood Plan area.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>	
Population and Community	<p>Given the site is only likely to have the capacity to deliver a very small number of dwellings (c.2 homes, although higher density development might be appropriate), the site does not offer a good opportunity to deliver homes of a range of types and tenures, including affordable housing.</p> <p>Located in Iminster town centre, the site is in excellent proximity to the services and facilities available here. This will limit the need for residents to travel for key amenities.</p>	
Health and Wellbeing	<p>The site is accessible to Iminster Medical Centre at Canal Way, which is located approximately 800m away.</p> <p>The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network.</p>	
Transportation	<p>The site benefits from a central location within Iminster town centre, which will limit the need for residents to travel for most day-to-day services and facilities.</p> <p>An allocation at this location will deliver development within on of the most accessible locations within the Neighbourhood Plan area, with good connections to local public transport networks.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.13

SEA theme	Commentary, 24: Gooch and Housego, Land Rear of the Market House
	
<p>Biodiversity and Geodiversity</p>	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site boundaries. The site comprises an existing building which has a low ecological value.</p>
<p>Climate Change</p>	<p>The site is within IIminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1 and has a very low surface water flood risk.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>The site is an area of underutilised brownfield land within the settlement boundary and is surrounded by existing buildings. Providing new development areas incorporate sensitive design, rejuvenating and regenerating the site has the potential to support townscape character.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within IIminster.</p>
<p>Historic Environment</p>	<p>The site is located within the IIminster Conservation Area. It is located within the Market Place, Cornhill, East and North Street sub-area of the conservation area defined in the Conservation Area Appraisal.</p> <p>The site comprises a Grade II listed building, the '3 and 5, East Street', which is a former shirt factory dating from 1916. The building is directly opposite to the Grade II listed Market House, and is adjacent to the Grade II listed '1, East Street'.</p> <p>Depending on the nature of proposals taken forward for this site, development of the building offers the potential to rejuvenate this feature of historic environment interest, if sensitively undertaken.</p>

<b>SEA theme</b>		<b>Commentary, 24: Gooch and Housego, Land Rear of the Market House</b>	
Land, Soil and Water Resources	<p>The site is an area of brownfield land within the settlement boundary. Therefore, an allocation at this location will support the efficient use of previously developed land.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>		
Population and Community	<p>The site is currently disused. Development of this site offers the potential to rejuvenate this important town centre site. The ability of the site to deliver affordable housing depends on viability, which may be a constraint for the site.</p> <p>Located in Iminster town centre, the site is in excellent proximity to the services and facilities available here. This will limit the need for residents to travel for key amenities.</p>		
Health and Wellbeing	<p>The site is accessible to Iminster Medical Centre at Canal Way, which is located approximately 800m away.</p> <p>The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network.</p>		
Transportation	<p>The site benefits from a central location within Iminster town centre, which will limit the need for residents to travel for some day-to-day services and facilities.</p> <p>An allocation at this location will deliver development within one the most accessible locations within the Neighbourhood Plan area, with good connections to local public transport networks.</p>		
<b>Key</b>			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.14

SEA theme	Commentary, 25: Land North of Station Road
	
<p>Biodiversity and Geodiversity</p>	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. The site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site boundaries. However, the River Isle passes alongside the western site boundary and is a designated Local Wildlife Site (LWS). There is a corridor of trees alongside the River Isle which contributes to local ecological networks. These natural assets would need to be retained and enhanced (where appropriate) through new development areas alongside the delivery of net gains.</p>
<p>Climate Change</p>	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is approximately 1km to the west of Iminster town centre. In this respect, an allocation at this location is less likely to reduce the need to travel by car for accessing day-to-day services and facilities (and associated greenhouse gas emissions).</p> <p>The River Isle flows alongside the western site boundary. With reference to flood risk issues, the whole of the site is within Flood Zone 2 and Flood Zone 3. Most of the site has a low surface water flood risk. However, there are areas of land with a medium to high surface water flood risk within the north western section of the site and along the southern and western site boundaries.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land. The Peripheral Landscape Study for Iminster indicates that the site is a preferred option for the delivery of new housing in Iminster through the emerging South Somerset Local Plan Review. The Study concludes that the site has a 'landscape with development potential providing flood risk is alleviated'. With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within Iminster.</p>

SEA theme	Commentary, 25: Land North of Station Road	
Historic Environment	<p>The site is not within the setting of the IIminster Conservation Area.</p> <p>The Grade II listed 'Old Toll House and Attached Railings', is located on the south eastern boundary of the site and is open and readily visible from the rest of the site. This Toll House dates from the mid-19th century. Associated with this feature, the HER identifies Station Road (bordering the site to the south) as the route of an 18<sup>th</sup> century turnpike road.</p> <p>The site has significant archaeological potential. The HER highlights that an archaeological evaluation of land at Hort Bridge undertaken in 2009 located a number of features indicative of late bronze age occupation, including spreads of burnt flint deposits, perhaps indicative of activities associated with 'burnt mounds'. The HER also highlights that historic maps show a former field boundary of likely post-medieval to 19th century date.</p> <p>No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding IIminster town. In this respect, the whole of the site is underlain by Grade 2 and Grade 3a land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, the River Isle flows alongside the western site boundary. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative distance to the services and facilities in IIminster town centre (c.1.6km walk to the Market House) which will increase the need for residents to travel for the amenities provided here. The site is however located on bus routes along Station Road, although services are relatively infrequent.</p>	
Health and Wellbeing	<p>IIminster Medical Centre at Canal Way is located approximately 1.2km away.</p> <p>The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network, including the network to the north west and south west of the town.</p>	
Transportation	<p>With reference to local public transport networks, the site is adjacent to bus stops located to the south along Station Road. Regarding the local PRoW network, there are no footpaths passing through the site.</p> <p>The site is approximately 1.6km walk to the west of IIminster town centre. In this respect, an allocation at this location is perhaps less likely to reduce the need to travel by car for accessing day-to-day services and facilities.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.15

SEA theme	Commentary, 26: Land East of Playing Fields, Shudrick Lane
Biodiversity and Geodiversity	 <p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. The site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there no BAP Priority Habitats within the site. However, there are corridors of trees located along the northern and western site boundaries and a hedgerow passing through the eastern section of the site. Additionally, Shudrick Stream passes alongside the northern site boundary. The features would need to be retained and enhanced (where appropriate) within new development areas, alongside the delivery of net gains.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is in relatively good proximity to the services and facilities in Ilinster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1. Most of the site has a very low to low surface water flood risk. However, there are areas of land immediately to the north of the site (adjacent to Shudrick Stream) which have a medium to high surface water flood risk. Impacts are dependent on the extent to which surface water issues are mitigated through new development areas, including through incorporating sustainable drainage techniques and natural features into the design.</p>
Landscape	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>Although the site is relatively flat and is adjacent to the existing settlement boundary, an allocation at this location would result in the loss of greenfield land. However, the Peripheral Landscape Study for Ilinster indicates that most of the site has a 'high' capacity to accommodate new development. The north eastern section of the site is identified as having a 'moderate-high' capacity to accommodate new development.</p>

SEA theme	Commentary, 26: Land East of Playing Fields, Shudrick Lane	
Landscape (continued)	<p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, the site is within the sightline of two locally identified viewpoints from within the town, specifically viewpoint eight (from High Street) and viewpoint 17 (from Ditton Street). However, given the relative distance of the site from the viewpoints (approximately 300m to the south and to the east, respectively) and its proximity to the settlement, an allocation at this location is less likely to significantly change the character of either viewpoint.</p>	
Historic Environment	<p>The site is located approximately 100m south of the Imlinster Conservation Area. However, the site is screened in many respects from the conservation area by intermediate development on the north side of Shudrick Lane. Development on some sections of the site however has the potential to be visible from limited parts of the conservation area, including on Love Lane and Townsend, which is part of the Butts, Bay Hill and Townsend sub-area of the conservation area. In this respect the Imlinster Conservation Area Appraisal highlights that there are extensive views across Shudrick valley to Pretwood Hill “from many of the buildings and from the streets between buildings on south side” of the sub-area.</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>No features listed on the Historic Environment Record are located on or adjacent to the site.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Imlinster town. In this respect, the whole of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, Shudrick Stream passes alongside the northern site boundary. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located with excellent access to services and facilities in Imlinster town centre (c.400m walk to the Market House), which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Imlinster Medical Centre at Canal Way, which is located approximately 950m away.</p> <p>The site is accessible to the Public Rights of Way network and the town’s wider green infrastructure network.</p>	
Transportation	<p>The site is located approximately 400m walk to Imlinster town centre, which will limit the need for residents to travel for some day-to-day services and facilities.</p> <p>With reference to local public transport networks, the nearest bus stops to the site are within Imlinster town centre (along East Street and Silver Street). Regarding the local PRow network, there are no footpaths passing through the site.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.16

SEA theme	Commentary, 27: Land to Rear of Blackdown View
	
<p>Biodiversity and Geodiversity</p>	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. The site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site boundaries. Adjoining the site, there is a corridor of trees located immediately to the east which connect to an area of deciduous woodland BAP Priority Habitat. There is also a corridor of trees located alongside the western site boundary. These natural assets contribute to local ecological networks within the landscape and would need to be retained and enhanced (where appropriate) through new development areas, alongside the delivery of net gains.</p>
<p>Climate Change</p>	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is in relatively good proximity to the services and facilities in IIminster town centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions)</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1 and has a very low surface water flood risk.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>An allocation at this location would result in the loss of greenfield land. Although the site is adjacent to the existing settlement boundary, it slopes upwards towards Beacon Hill (to the north and north west) and has an elevated setting in the landscape. The Peripheral Landscape Study for IIminster indicates that the site has a 'moderate-low' to 'low' capacity to accommodate new development.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, the site is within the sightline of locally identified viewpoint 16 from within the town. However, given the relative distance of the site from the viewpoint (approximately 1.25km to the north) and its proximity to the settlement, an allocation at this location is less likely to significantly change the character of either viewpoint.</p>
<p>Historic Environment</p>	<p>The eastern boundary of the site adjoins the Butts, Bay Hill and Townsend sub-area of the IIminster Conservation Area, and specifically the approach to Dillington Park estate.</p>

SEA theme	Commentary, 27: Land to Rear of Blackdown View	
Historic Environment (continued)	<p>The straight drive leads north and is enclosed by strong tree belts each side. Whilst the existing tree belts provide screening from the site, there would be impacts from development on views to and from the driveway corridor.</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>The HER highlights that the sites of two lime kilns are present on the western edge of the site and a Quaker burial ground is located in the south western corner of the site. The central northern boundary of the site comprises the site of a WWII pillbox.</p> <p>According to the HER, adjacent to the eastern boundary of the site (comprising the area covered by the conservation area) is part of the Dillington and Whitelackington Landscape Park. In this context a landscape survey undertaken in 2005 identified three phases in the development of a designed landscape centred on Dillington House. A Stuart deer park and garden was developed around the house in c1620, followed by the creation of a landscape park between 1767 and 1771. Remodelling of this was then undertaken from 1837. In addition, the HER identifies several tetrahedral WWII anti-tank obstacles on the south drive to Dillington House (although these are located beyond the boundary of the site).</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, the whole of the site is underlain by Grade 2 and Grade 3a land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries.</p> <p>The site could potentially overlap with the Building Stone MSA. However, it is difficult to be certain due to the scale of Map Eight presented within the Somerset Minerals Plan.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located with good access to services and facilities in Iminster town centre (c.700m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>Iminster Medical Centre at Canal Way is located approximately 1.2km away. The site has good access to the Public Rights of Way network and the town's wider green infrastructure network. This includes to the South Somerset Cycle Route which follows the approach to Dillington Park estate.</p>	
Transportation	<p>Given its size, the site is located c.700m walk to Iminster town centre, which will limit the need for residents to travel for some day-to-day services and facilities.</p> <p>With reference to local public transport networks, the nearest bus stops are located approximately 150m to the south of the site along High Street and Blackdown View. Regarding the local PRow network, there is a footpath passing along the western site boundary connecting to High Street and into the town centre.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.17

SEA theme	Commentary, 28: Land East of Winterhay Lane
	
<p>Biodiversity and Geodiversity</p>	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. The site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, there are trees and hedgerows located along the site boundaries and a hedgerow separating the two northern fields within the site. These features would need to be retained and enhanced (where appropriate) within new development areas, alongside the delivery of net gains.</p>
<p>Climate Change</p>	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is approximately 1.4km to the north west of Ilminster town centre. In this respect, an allocation at this location is less likely to reduce the need to travel by car for accessing day-to-day services and facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1. Most of the site has a very low surface water flood risk. However, there is a small area of land towards the north western corner of the site which has a medium to high surface water flood risk.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>The site is an area of greenfield land located outside of the existing settlement boundary of Ilminster (approximately 250m to the north). This increases its impact on the landscape. However, the site is relatively flat and benefits from visual screening from vegetation along its boundaries. In this regard, the Peripheral Landscape Study for Ilminster indicates that the northern two fields within the site have a 'moderate' to 'moderate-high' capacity to accommodate new development. The south western field within the site is identified as having a 'high' capacity to accommodate new development.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within Ilminster.</p>

SEA theme		Commentary, 28: Land East of Winterhay Lane	
Historic Environment	<p>The site is not within the immediate setting of the Iminster Conservation Area. Whilst the Grade II listed Manor Farmhouse is located 130m to the west, impacts on the setting of the farmhouse are likely to be limited.</p> <p>No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>As highlighted on the HER, the site of a WWII anti-tank ditch is present on the eastern boundary of the site. In addition, the site of an anti-tank roadblock is present on the same boundary.</p>		
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. In this respect, the whole of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with an NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA.</p>		
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative distance to the services and facilities in Iminster town centre (c.1.4km walk to the Market House) which will increase the need for residents to travel for the amenities provided here. The site is not located on bus routes.</p>		
Health and Wellbeing	<p>The site is relatively accessible to Iminster Medical Centre at Canal Way, which is located approximately 950m away.</p> <p>The site has good access to the Public Rights of Way network and the town's wider green infrastructure network, including via the footpath present on the northern boundary of the site.</p>		
Transportation	<p>The site is approximately 1.4km walk to Iminster town centre. In this respect, an allocation at this location is perhaps less likely to reduce the need to travel by car for accessing day-to-day services and facilities.</p> <p>With reference to local public transport networks, the nearest bus stops are located approximately 500m to the south of the site along Station Road. Regarding the local PRoW network, there are no footpaths passing through the site.</p>		
<b>Key</b>			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

**Table 4.18**

SEA theme	Commentary, 29: Land off Canal Way Phase 2
Biodiversity and Geodiversity	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. Additionally, the site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, Herne Hill Local Nature Reserve (LNR) is immediately to the south of the site, comprising a large area of deciduous woodland BAP Priority Habitat. Additionally, there are trees and hedgerows located within and along the site boundaries. These natural assets contribute to local ecological networks within the landscape and would need to be retained and enhanced (where appropriate) through new development areas, alongside the delivery of net gains.</p>
	Climate Change

SEA theme	Commentary, 29: Land off Canal Way Phase 2
Landscape	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>Regarding landscape character, an allocation at this location would result in the loss of greenfield land. The northern section of the site is relatively flat and is adjacent to the settlement boundary. Comparatively, the central and southern sections of the site are outside of the settlement boundary and slope upwards to the south and south west to Mitchell’s Hill and Herne Hill. In this respect, new development within the central and southern sections of the site would likely result in significant changes to the character of the existing site and to the surrounding landscape, extending the settlement to the south.</p> <p>The Peripheral Landscape Study for Ilminster indicates that the northern section of the site has the greatest capacity to accommodate new development. The capacity for new development reduces within the central and southern half of the site given the relative distance from the existing settlement boundary.</p> <p>There are approximately 16 significant trees located along the site boundaries and along field margins within the site which have TPO designations. It is anticipated that these locally important landscape features could be retained within new development areas.</p> <p>In terms of visual impacts, the site is within the sightline of two locally identified viewpoints from within the town (from Station Road), specifically viewpoints four and five. However, given the relative distance of the northern section of the site from the viewpoints (approximately 300m to the south) and the relatively flat topography at this location, an allocation in the northern section of the site is less likely to significantly change the character of either viewpoint. However, due to the sloping aspect and relatively elevated location of the central and southern sections of the site, new development at these locations could potentially impact upon the character of these viewpoints (which look across to Mitchell’s Hill and Herne Hill).</p>
Historic Environment	<p>Development of the site is not likely to affect the setting of the Ilminster Conservation Area.</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>The HER identifies the area as being within the site of Donyatt Park deerpark, which is mentioned in the C11th Domesday Book, and which extended to 500 acres in the late C16th. The area covered by the western edge of the site has been listed on the HER as “Earthworks, possibly golf course, north of Coldharbour Farm, Donyatt”, denoting part of a potentially early C20th golf course.</p>
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Ilminster town. In this respect, land within the south eastern section of the site is underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes. Most of the site comprises Grade 3b land (i.e. not BMV for agricultural purposes).</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The site could potentially overlap with the Building Stone MSA. However, it is difficult to be certain due to the scale of Map Eight presented within the Somerset Minerals Plan.</p>

SEA theme	Commentary, 29: Land off Canal Way Phase 2	
Population and Community	<p>Allocation of the site has the potential to deliver a significant number of homes of a range of types and tenures. This will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>Depending on the part of the site, the site is located at relative proximity to services and facilities in Ilminster town centre (the part of the site located closest to the town centre is c.950m walk to the Market House). This will limit the need for residents to travel for the amenities provided here. It should be noted though that some parts of the site are located at more significant distance from the town centre (c.1.5km).</p>	
Health and Wellbeing	<p>Given it is adjacent to the facility, the site has excellent access to Ilminster Medical Centre.</p> <p>The site has excellent access to the Public Rights of Way network and the town's wider green infrastructure network. This includes via footpaths linking key assets to the south of Ilminster such as Herne Hill.</p>	
Transportation	<p>The northern section of the site is in relative proximity to the services and facilities in Ilminster town centre, helping to limit the need to travel to local facilities. There are bus stops located directly to the north of the site along Canal Way, providing connectivity to local public transport networks.</p> <p>Due to its size, the central and southern sections of the site are approximately 1km to 1.5km to the south west of Ilminster town centre. In this respect, development within these locations is less likely to reduce the need to travel by car for accessing day-to-day services and facilities.</p> <p>There are footpaths passing through the site which contribute to a local PRoW network and provide a circular route via Mitchell's Hill and Herne Hill. It is anticipated that these footpaths could be retained and enhanced (where appropriate) through new development areas.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.19

SEA theme	Commentary, 31: Land to East of Greenway, Listers Hill
	
<p>Biodiversity and Geodiversity</p>	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. The site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, there are corridors of trees and hedgerows located along the site boundaries. These natural assets contribute to local ecological networks within the landscape and would need to be retained and enhanced (where appropriate) through new development areas, alongside the delivery of net gains.</p>
<p>Climate Change</p>	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. The site is approximately 900m to the south of IIminster town centre.</p> <p>The site has a low fluvial flood risk potential and is wholly located within Flood Zone 1. However, there is a corridor of land located approximately 50m to the south of the site (adjacent to Dowlish Brook) which is within Flood Zone 2 and Flood Zone 3. Although most of the site has a very low surface water flood risk, there is an area of land within the south western corner of the site which has a medium to high surface water flood risk.</p>
<p>Landscape</p>	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>An allocation at this location would result in the loss of greenfield land. An allocation of the whole site area would remove one of the fields contributing to a green gap between IIminster town and neighbouring properties at Dowlish Ford and Moolham.</p> <p>The Peripheral Landscape Study for IIminster indicates that the northern half of the site has a 'moderate-low' capacity to accommodate new development. The southern half of the site is identified as having a 'moderate' capacity to accommodate new development.</p>

SEA theme	Commentary, 31: Land to East of Greenway, Listers Hill	
Landscape (continued)	<p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, locally identified viewpoint 16 within the Neighbourhood Plan area is located at the north western corner of the site. However, the sightline for the viewpoint extends to the north towards Beacon Hill (away from the site). Therefore, new development within the site is not likely to detract from the character of the view.</p>	
Historic Environment	<p>The site is not within the setting of the Ilminster Conservation Area.</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>Listers Hill on the western boundary of the site is identified by the HER as the route of an C18th turnpike road, "Ilminster to Sea Bridge, Donyatt" which was a turnpike road of the Ilminster Trust turnpiked in 1759. The southern boundary of the site is the site of the Chard Canal, which linked Chard and Ilminster with the Taunton and Bridgewater Canal. It was closed in 1867. Development on the site is however unlikely to affect the archaeological potential of these routes. The HER also highlights the northern boundary of the site is the site of a WWII anti-tank ditch, with the site of a further anti-tank ditch extending a small way into the eastern part of the site. A boundary post located on the south west corner of the site is also identified on the HER.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Ilminster town. In this respect, the southern and western sections of the site are underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes. The northern and eastern sections of the site comprise Grade 3b land (i.e. not BMV for agricultural purposes).</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The site could potentially overlap with the Building Stone MSA. However, it is difficult to be certain due to the scale of Map Eight presented within the Somerset Minerals Plan.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative proximity to services and facilities in Ilminster town centre (c.900m walk to the Market House) which will limit the need for residents to travel for the amenities provided here.</p>	
Health and Wellbeing	<p>Ilminster Medical Centre at Canal Way is located approximately 1.3km away. The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network, including the network to the south of the town.</p>	
Transportation	<p>With reference to local public transport networks, there are bus stops located approximately 100m to the north of the site along Listers Hill. Regarding the PRow network, there are no footpaths passing through the site.</p> <p>The site is approximately 900m to the south of Ilminster town centre.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.20

SEA theme	Commentary, 32: Land to East of Greenway (Larger Site)
Biodiversity and Geodiversity	<p>An allocation at this location is not likely to adversely impact any internationally or nationally designated sites for biodiversity. The site does not overlap with a SSSI IRZ for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential).</p> <p>At the local level, there are no BAP Priority Habitats within the site. However, Herne Hill LNR is adjacent to the northern and north western site boundaries, comprising areas of deciduous woodland BAP Priority Habitat. Additionally, there are trees and hedgerows located within and along the site boundaries. These natural assets contribute to local ecological networks within the landscape and would need to be retained and enhanced (where appropriate) through new development areas, alongside the delivery of net gains.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location. Parts of the site are over 1km from IIminster town centre. In this respect, an allocation at this location is less likely to reduce the need to travel by car for accessing day-to-day services and facilities (and associated greenhouse gas emissions).</p> <p>With reference to flood risk issues, the whole of the site is within Flood Zone 1 and has a low to very low surface water flood risk. There is a corridor of land located approximately 50m to the south of the site (adjacent to Dowlish Brook) which is within Flood Zone 2 and Flood Zone 3.</p>
Landscape	<p>The site is not within or within proximity to a National Park, AONB or any Green Belt land.</p> <p>The Peripheral Landscape Study for IIminster indicates that most of the site has a 'low' to 'moderate-low' capacity to accommodate new development. The south eastern section of the site is identified as having a 'moderate' capacity to accommodate new development. An allocation of the whole site area would extend the settlement to the south west and remove some of the fields which provide a green gap between IIminster town and properties at Dowlish Ford.</p> <p>With reference to locally important landscape features, the site does not contain any significant trees with TPO designations.</p> <p>In terms of visual impacts, an allocation at this location is not likely to impact upon any of the locally identified viewpoints within IIminster.</p>

SEA theme	Commentary, 32: Land to East of Greenway (Larger Site)	
Historic Environment	<p>The site is not within the setting of the Iminster Conservation Area.</p> <p>No nationally listed buildings are present on the site and the site is not within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>The eastern boundary of the site is the site of the Chard Canal, which linked Chard and Iminster with the Taunton and Bridgewater Canal. It was closed in 1867. Two further features associated with the canal listed on the HER and located on the north east boundary of the site are the Iminster Tunnel and the Iminster Incline. Development on the site is however unlikely to affect the archaeological potential of the canal route.</p>	
Land, Soil and Water Resources	<p>A detailed ALC assessment has been completed for most of the undeveloped areas of land surrounding Iminster town. The northern half, south eastern and south western sections of the site are underlain by Grade 3a land which is some of the best and most versatile land for agricultural purposes. The remaining areas of the site comprise Grade 3b land (i.e. not BMV for agricultural purposes).</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a NVZ or SPZ.</p> <p>The Somerset Minerals Plan indicates that the site does not overlap with a MSA. Land directly to the south east of the site potentially overlaps with the Building Stone MSA. However, it is difficult to be certain given the scale of Map Eight within the Somerset Minerals Plan.</p>	
Population and Community	<p>Allocation of the site has the potential to deliver a significant number of homes of a range of types and tenures. This will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>Depending on the part of the site, the site is located at relative proximity to services and facilities in Iminster town centre (the part of the site located closest to the town centre is c.950m walk to the Market House). This will limit the need for residents to travel for the amenities provided here. It should be noted though that some parts of the site are located at more significant distance from the town centre (c.1.4km).</p>	
Health and Wellbeing	<p>Iminster Medical Centre at Canal Way is located approximately 1.1km away by road.</p> <p>The site has good access to the Public Rights of Way network and the town's wider green infrastructure network, including the network to the south of the town.</p>	
Transportation	<p>The site is approximately 1km to the south of Iminster town centre. In this respect, an allocation at this location is less likely to reduce the need to travel by car for accessing day-to-day services and facilities.</p> <p>With reference to local public transport networks, the nearest bus stops are located approximately 350m to the east of the site along The Crescent and Listers Hill. Regarding the local PRoW network, there is a footpath passing through the central section of the site (north to south) which connects to Herne Rise (a residential area within the town) and on to Herne Hill. It is anticipated that the footpath could be retained and enhanced (where appropriate) through new development areas.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

**Table 4.21: Summary of site assessment findings**

Site	Biodiversity and Geodiversity	Climate Change	Landscape	Historic Env.	Land, Soil and Water Resources	Population and Community	Health and Wellbeing	Transport
12	Yellow	Yellow	Blue	Red	Red	Green	Green	Green
13	Yellow	Yellow	Blue	Blue	Red	Green	Green	Green
14	Yellow	Yellow	Yellow	Blue	Red	Green	Green	Green
15	Blue	Blue	Blue	Red	Red	Green	Green	Green
16	Yellow	Red	Blue	Blue	Red	Green	Green	Blue
17	Yellow	Red	Blue	Yellow	Red	Green	Green	Blue
18	Yellow	Yellow	Blue	Red	Red	Green	Green	Green
20	Yellow	Yellow	Red	Yellow	Red	Green	Green	Green
21	Blue	Red	Yellow	Yellow	Red	Blue	Green	Blue
22	Red	Yellow	Blue	Blue	Red	Green	Green	Green
23	Yellow	Yellow	Yellow	Red	Green	Blue	Green	Green
24	Yellow	Yellow	Yellow	Blue	Green	Green	Green	Green
25	Blue	Red	Yellow	Red	Red	Green	Green	Blue
26	Blue	Blue	Yellow	Blue	Red	Green	Green	Green
27	Yellow	Yellow	Blue	Blue	Red	Green	Green	Green
28	Yellow	Blue	Blue	Yellow	Red	Blue	Green	Blue
29	Blue	Blue	Red	Yellow	Blue	Green	Green	Blue
31	Yellow	Blue	Blue	Yellow	Red	Green	Green	Blue
32	Blue	Blue	Red	Yellow	Red	Green	Green	Blue

Key	
Likely adverse effect (without mitigation measures)	Red
Neutral/no effect	Yellow
Likely positive effect	Green
Uncertain effect	Blue

## Current version of the Neighbourhood Plan

### Development of the INP policies

- 4.16 To support the implementation of the vision and aims for the Neighbourhood Plan discussed in section 2.7 and 2.8, the current version of the INP puts forward 15 policies to guide development in the Neighbourhood Plan area, grouped by four themes. These were developed following extensive community consultation and evidence gathering.
- 4.17 Prior to the finalisation of the current Regulation 14 consultation version of the INP, the SEA team undertook an appraisal of an initial version of Neighbourhood Plan policies. At that stage, a number of recommendations were made to plan makers for further improving the sustainability performance of the plan.
- 4.18 These recommendations included as follows:
- Inclusion of additional provisions relating to Ilminster’s archaeological resource.

- Include additional provisions relating to the findings of the Habitats Regulations Assessment undertaken alongside the development of the Neighbourhood Plan to date.
- Changes in background/explanatory text.

## Neighbourhood Plan policies

4.19 The policies presented in the current Regulation 14 consultation version of the Neighbourhood Plan are as follows:

### **Environment and Leisure**

Policy ILM1: Conserve and enhance Ilminster's historic landscape setting

Policy ILM2: Conserve and enhance Ilminster's ecology, species, and habitats

Policy ILM3: Enhance and connect our local green open spaces with a 'Green Chain'

Policy ILM4: Enhance recreational facilities for our growing community

### **Economy, Tourism and Heritage**

Policy ILM5: Allocate an Ilminster Environmental Enterprise Zone to the west of Ilminster

Policy ILM6: Enhance Ilminster's economy, tourism, and heritage

Policy ILM7: Promote high quality design

### **Access and Movement**

Policy ILM8: Encourage shoppers and visitors into Ilminster's town centre

Policy ILM9: Safe, interesting walking and cycling routes

Policy ILM10: Welcome people to Ilminster

Policy ILM11: Preserve and enhance the historic market town centre

### **Homes and Places for Living**

Policy ILM12: Amount and Location of new homes

Policy ILM13: Types of new homes

Policy ILM14: Allocated or small brownfield sites

Policy ILM15: Design and layout of strategic sites

4.20 These policies have been appraised in **Chapter 5** below.

## 5. What are the appraisal findings at this current stage?

### Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 consultation version of the Ilminster Neighbourhood Plan. This chapter presents:
- An appraisal of the current version of the Neighbourhood Plan under the eight SEA theme headings; and
  - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### Approach to this appraisal

- 5.2 The appraisal is structured under the eight themes taken forward for the purposes of the SEA.
- 5.3 For each theme, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### Biodiversity and Geodiversity

- 5.5 There are no European or nationally designated sites for biodiversity and / or geodiversity located within or adjacent to any of the proposed site allocations (see Policy ILM12). Additionally, none of the proposed site allocations overlap with SSSI Impact Risk Zones (IRZs) for the types of developments likely to come forward during the plan period.
- 5.6 The Neighbourhood Plan has also been accompanied by a Habitats Regulations Assessment (HRA), which considers in detail the potential impact pathways between the potential site allocations and European designated sites, alone or 'in-combination' with other plans and projects. Several recommendations in the form of additional policy wording are outlined to ensure that adequate mitigation measures are delivered by developers at the planning application stage for the proposed allocations on Site 10, Site 19, Site 25, Site 26, and Site 31. These recommendations (which relate to integrity of functionally linked land and the issue of phosphate neutrality for the Somerset Levels and Moors SPA / Ramsar Site) can be viewed within the HRA and have been reflected within Policy ILM2 in the Neighbourhood Plan (objective F and G). As the recommendations have been appropriately considered and addressed within Policy ILM2, the HRA concludes that the Neighbourhood Plan will not result in adverse effects to the integrity of the Somerset Levels and Moors SPA / Ramsar Site.
- 5.7 Through changes in land management, one of the key initiatives within the UK Government's Environment Bill (2020) is to develop a Nature Recovery Network, providing 500,000 hectares of additional wildlife habitat, more effectively linking existing protected sites and landscapes, as well as urban green and blue infrastructure<sup>19</sup>. An environmental net gain principle for

<sup>19</sup> GOV.UK (2020): 'Environment Bill – Policy Statement', [online] available to access via: <https://www.gov.uk/government/publications/environment-bill-2020/30-january-2020-environment-bill-2020-policy-statement>

development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan<sup>20</sup> (which was published in January 2018) and the Planning White Paper (published in August 2020)<sup>21</sup>. In this regard, Policy ILM3 'Enhance and Connect Local Green Spaces with a Green Chain' states that the proposed site allocations should increase biodiversity by attracting more flora and fauna, and by enhancing the identified 'Green Chain' network (shown in Figure 2 'The INP Proposals Map within the Neighbourhood Plan'). Policy ILM15 'Design and Layout of Strategic Sites' seeks to ensure that the two largest sites within the Neighbourhood Plan area in terms of the number of dwellings (Site 10 and Site 25) deliver sustainable development in line with local and national policy. Specifically, proposals must:

- Incorporate sustainable landscaping with minimal hard (non-permeable) landscaping and maximum net gain of native species for biodiversity; and
- Provide well-designed, substantial, and sensitive landscaping within developments for nature conservation and biodiversity net gain, particularly along the site boundary, in areas of ecological importance, adjacent to waterways, and adjacent to nature reserves.

- 5.8 As key components of local ecological networks, Local Wildlife Sites (LWS) and Local Nature Reserves (LNRs) represent some of the most significant areas of semi-natural habitat in South Somerset District. In particular, the River Isle, Shudrick Stream and canal provide an important network of waterways, associated floodplains, trees, and wildlife corridors. Whilst none of the proposed site allocations are within a LWS or LNR, Site 25 is located adjacent to the River Isle LWS (which flows alongside the western site boundary). Additionally, Site 12, Site 15, and Site 22 either contain or are directly adjacent to areas of traditional orchard Biodiversity Action Plan (BAP) priority habitat. Many of the proposed site allocations also have corridors of trees and hedgerows located along the site boundaries.
- 5.9 Whilst the loss of these habitats and natural features to development is unlikely, disturbance at these locations has the potential to take place from noise, light pollution or trampling from enhanced access. Nonetheless, the proposed site allocations have the potential to provide enhancements to ecological networks. This could include retaining and enhancing habitats, improving ecological connectivity to create biodiversity networks with the surrounding landscape, and including measures to attract wildlife to new development areas such as: planting wildflower meadows and native hedgerows; bridges / tunnels for small mammals; the use of boxes / bricks for birds, bees and invertebrates; ponds and drainage ditches.
- 5.10 Key policies in this respect include Policy ILM1 'Conserve and Enhance Ilminster's Historic Landscape Setting', which seeks to conserve and enhance natural features including trees, hedgerows, and waterways. Policy ILM2 also contains several considerations for conserving and enhancing Ilminster's ecology, habitats, and wildlife. For example, all development proposals shall be required to plant new trees, replant double the number of trees which are removed during construction, facilitate a green chain either within or adjacent to the site<sup>22</sup>, and provide at least a 10-metre buffer zone adjacent to any existing habitats and any new habitats which are established as part of the proposal. Furthermore, Policy ILM5 defines an 'Environmental Enterprise Zone' within the western section of Ilminster, with the boundaries of the Zone encompassing the proposed site allocations at Site 25 and Site 30. Within the Zone (and subject to other Neighbourhood Plan policies), development which conserves and enhances biodiversity, nature reserves, and open spaces will be supported.
- 5.11 Overall, Neighbourhood Plan policies should help ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains.

<sup>20</sup> DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: <<https://www.gov.uk/government/publications/25-year-environment-plan>>

<sup>21</sup> MHCLG (2020): 'Planning for the Future', [online] available to access via:

<<https://www.gov.uk/government/consultations/planning-for-the-future>>

<sup>22</sup> Green chains (or ecological corridors) and buffer zones align with Sir John Lawton's 'Making Space for Nature' Report (published in 2010, accessible [here](#)) through encouraging the delivery of bigger, better, and joined areas for biodiversity.

## Climate Change

- 5.12 In terms of climate change mitigation, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with the wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.
- 5.13 Whilst the delivery of in the region of 839 homes through the Ilminster Neighbourhood Plan will increase greenhouse gas emissions either directly through construction, or indirectly through an increase in population, the built footprint of the area and associated travel and consumption behaviours, this level of housing would likely be mirrored by the approval of planning applications. As such the level of development proposed through the Neighbourhood Plan will be unlikely to lead to increases in greenhouse gas emissions over and above that would be seen otherwise.
- 5.14 In relation to climate change mitigation, Policy ILM15 (Design and Layout of Strategic Sites) seeks to reduce a reliance on fossil fuels, setting a target of 10% minimum renewable energy sources for residential development. This is to be achieved through on-site renewable energy production. These provisions will therefore support climate change mitigation through helping to limit greenhouse emissions from new development areas.
- 5.15 Climate change mitigation will also be supported by a number of policies seeking to encourage walking and cycling through enhanced pedestrian and cycle provision, which will play a role in limiting emissions from private vehicle dependency. These provisions are discussed in more detail under the 'Transportation' SEA theme below. The majority of sites in the Plan area are also within a reasonable walking distance from services in the town centre, and are well connected to the public rights of way and green infrastructure network, which will encourage travel by foot.
- 5.16 As highlighted by the NPPF, well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within the Neighbourhood Plan area is therefore a key way in which the Neighbourhood Plan can help to promote climate change adaptation measures. In this respect, the Neighbourhood Plan policies which support green infrastructure provision and the protection and enhancement of natural features within the townscape will support climate change adaptation in the Plan area. In this regard, Policy ILM3 (Enhance and Connect Local Green Open Spaces with a 'Green Chain') encourages the protection of key natural features within the Plan area. The 'Green Chain' seeks to link individual sites rich in biodiversity together, offering better protection for green connections within Ilminster. This, alongside the enhancement of other green open spaces will likely support climate change adaptation within the Plan area. Similarly, Policy ILM12 seeks to implement the Community Infrastructure Levy (CIL) to develop and maintain the Green Chain in Ilminster, and by deterring development which could potentially cause harm to important green areas and infrastructure.
- 5.17 With regards to flood risk in the Plan area, the majority of allocated sites have low fluvial flood risk (within Flood Zone 1, assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)). However, parts of Site 25 (Land north of Station Road and part of Site 16) and Site 21 (Land to the east of Old Orchard) fall within Flood Zone 3, which has >1% annual probability of flooding from rivers and/or the sea. These areas are broadly aligned with the flood corridors of the Isle River and the Sudwick stream, its tributary, in the west part of the Plan area.
- 5.18 Surface water flooding is prevalent in the western and southern part of the Plan area, at Canal Way and at land broadly adjacent to the river at Station Road in the west. Parts of Site 25 are particularly susceptible to the effects of surface water flooding, which creates challenges for future development. Coupled with a high risk of fluvial flooding, this site in particular is constrained in terms of flood risk for large-scale development.
- 5.19 These flood risk issues are recognised by Policy ILM5 (Design and Layout of Strategic Sites), which encourages the incorporation of Sustainable Drainage Systems (SuDS) as part of

development. SuDS will support the efficient management of surface water runoff, whilst minimising pollution and managing the impact on water quality of local water bodies, such as the Isle River. As advised by the Flood and Water Management Team for Somerset County Council<sup>23</sup>, master planning could assist in alleviating flood risk at Site 25 through '*setting aside land for SuDS*'. Furthermore, the Environment Agency indicate that this could also be achieved through an appropriate Flood Sequential Test, in order to indicate that flood risk at the site is outweighed by '*wider sustainability benefits to the community that outweigh flood risk*'<sup>24</sup>.

- 5.20 Overall, climate change mitigation measures brought forward through plan policies are likely to reduce the carbon footprint of future development in Ilminster and have a positive effect on the Plan area in relation to the Climate Change SEA theme. Flood risk however continues to present some restrictions to development, which will need to be addressed as development comes forward on the allocated sites.

## Landscape

- 5.21 In terms of landscape sensitivity, none of the proposed site allocations (see Policy ILM12) are within the boundaries of a National Park, Area of Outstanding Natural Beauty (AONB), or areas of Green Belt land. The nearest nationally designated landscape is the Blackdown Hills AONB, approximately 6km to the west of the Neighbourhood Plan area.

- 5.22 Landscape and townscape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape and townscape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. Ilminster is one of four historic rural market towns in the administrative district of South Somerset. Occupying a rural hill and vale landscape, Ilminster is surrounded by agricultural land and woodland. The town nestles within three landmark hills – Beacon Hill to the north, Herne Hill to the south west and Pretwood Hill to the south east. In the context of the above, a summary of the local landscape and townscape sensitivity in relation to the proposed site allocations is provided below:

- Site 12: Although the site is adjacent to the existing settlement boundary, it slopes upwards towards Beacon Hill (to the east) and is prominent in its setting in the landscape. The Peripheral Landscape Study for Ilminster indicates that the site has a 'low' to 'moderate-low' capacity to accommodate new development areas.
- Site 15A: Most of the site is relatively flat and adjacent to the existing settlement boundary. The Peripheral Landscape Study for Ilminster indicates that most of the site has a 'high' capacity to accommodate new development. Land towards the eastern site boundary is identified as having a 'moderate' capacity to accommodate new development.
- Site 17 & Site 31: Allocating the entire site areas would remove fields which contribute to a green gap between Ilminster town and neighbouring properties at Dowlish Ford and Moolham. The Peripheral Landscape Study for Ilminster indicates that the northern half of the sites have a 'moderate-low' capacity to accommodate new development. The southern half of the sites are identified as having a 'moderate' capacity.
- Site 19: Most of the site is relatively flat and adjacent to the existing settlement boundary. The Peripheral Landscape Study for Ilminster indicates that the site has a 'high' capacity to accommodate new development.
- Site 21 (A&B): The sites are relatively flat and adjacent to the existing settlement boundary. The Peripheral Landscape Study for Ilminster indicates that the sites have a 'high' capacity to accommodate new development providing flood risk is alleviated.

<sup>23</sup> Lead Local Flood Authority (2019): 'Application 19-00012-OUT' [online] available at: <https://www.southsomerset.gov.uk/my-requests/document-viewer?DocNo=8774470>

<sup>24</sup> Environment Agency (2021): 'Application 19-00012-OUT'[online] available at: <https://www.southsomerset.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=9830179>

- Site 22A: The site is adjacent to the settlement boundary. The Peripheral Landscape Study for Ilminster indicates that the eastern half of the site has a 'low' to 'moderate-low' capacity to accommodate new development. The western half the site has a lower elevation in the landscape. In this respect, the Study concludes that the western half of the site has a 'moderate' capacity to accommodate new development.
- Site 23 & Site 24: The sites are areas of underutilised brownfield land within the settlement boundary, surrounded by existing buildings. Providing new development areas incorporate sensitive design, rejuvenating and regenerating the sites has the potential to support townscape character.
- Site 25: The Peripheral Landscape Study for Ilminster indicates that the site is a preferred option for the delivery of new housing in Ilminster through the emerging South Somerset Local Plan Review. The Study concludes that the site has a 'landscape with development potential providing flood risk is alleviated'.
- Site 26: The site is relatively flat and is adjacent to the existing settlement boundary. The Peripheral Landscape Study for Ilminster indicates that most of the site has a 'high' capacity to accommodate new development. The north eastern section of the site is identified as having a 'moderate-high' capacity to accommodate new development.

5.23 Based on the above, it is recognised that Site 12, Site 17, Site 22A, and Site 31 have the lowest capacity to accommodate new development areas. Nonetheless, all the proposed site allocations have the potential to adversely impact local landscape and townscape character in the absence of sensitive design. Reflecting these sensitivities, development proposals should include measures which demonstrate how any impacts would be appropriately mitigated through the application of sensitive design. This could include measures which seek to conserve and enhance the special qualities of the local landscape and townscape, retain and enhance locally important viewpoints, incorporate local materials into the design to respond to local architectural styles, and incorporate visual screening from the surrounding landscape (including from nearby residential areas).

5.24 Key policies within the Ilminster Neighbourhood Plan in this regard include Policy ILM1 'Conserve and Enhance Ilminster's Historic Landscape Setting' which seeks to ensure that all development proposals are accompanied by a strategic landscape plan and associated management for the whole site. Policy ILM1 also outlines that development proposals should conserve and enhance local landscape character and features, including trees, hedgerows, and waterways. Policy ILM7 'Promote High Quality Design' defines a set of criteria to ensure that development is in-keeping with the identified characteristics and the unique character of the town, summarised below (and explored in further detail within Appendix C 'The Ilminster Design Guide' which accompanies the Neighbourhood Plan):

- High-quality architecture to create a harmonious townscape;
- A strong visual relationship between the built environment and its landscape setting; and
- A palette of materials, craftsmanship, and authenticity of construction to present a coherent and high-quality finish.

5.25 Policy ILM5 defines an 'Environmental Enterprise Zone' within the west of Ilminster (including the River Isle and the surrounding floodplains), with the boundaries of the Zone encompassing the proposed site allocations at Site 25 and Site 30. Within the Zone (and subject to other Neighbourhood Plan policies), development which conserves and enhances local landscape character and local landscape distinctiveness will be supported. Additionally, Policy ILM15 'Design and Layout of Strategic Sites' seeks to ensure that the two largest sites within the Neighbourhood Plan area (Site 10 and Site 25) deliver sustainable development in line with local and national policy. Specifically, proposals must:

- Contribute positively to the area's character, scale, layout, height and form;
- Incorporate sustainable landscaping with associated maintenance and management plans; and

- Provide well-designed, substantial, and sensitive landscaping within developments for amenity space.
- 5.26 More broadly in relation to landscape and townscape character, Policy ILM8 'Encourage Shoppers and Visitors into Ilminster's Town Centre' confirms that development proposals will create or contribute to an attractive and inclusive public realm, including the use of appropriate street signage, lighting, layout, and accessibility. This is reaffirmed through Policy ILM10 'Welcome People to Ilminster', encouraging proposals which seek to improve identified gateways and road junctions on approach to the town. Within the settlement boundary, applications for infill development is supported through Policy ILM14 'Allocated or Small Brownfield Sites' providing the proposals are in accordance with the Ilminster Design Guide and appropriately consider the character of the immediate environs. This includes (but is not limited to): layout, density, gardens, size of dwellings, appearance, and gaps between buildings.
- 5.27 In terms of visual amenity, Policy ILM1 affirms that all development proposals must demonstrate how they preserve all views of the following key areas of landscape and townscape significance: Beacon Hill, Herne Hill, Pretwood Hill, the River Isle, and The Minster. Additionally, proposals shall be expected to enhance views and vistas, including the twenty identified and protected views of Ilminster as shown in Figure 5 'Protected Views, Landscape Character and Designations' within the Neighbourhood Plan. This is important in the context of the proposed site allocations, as the following sites are within the sightline of at least one protected view: Site 12, Site 15A, Site 19, Site 26, and Site 31.
- 5.28 Regarding locally important landscape and townscape features of interest, South Somerset District Council have designated Tree Preservation Orders (TPOs) in the interest of their amenity value. This includes a significant tree along the southern boundary of Site 15A (adjacent to Shudrick Stream). However, it is anticipated that these features can be retained through new development areas. Delivering net gains in biodiversity and green infrastructure enhancements also has the potential to help conserve and enhance landscape and townscape character, including its special qualities and sense of place. For example, enhanced habitats (trees, hedgerows, grass, shrub, etc.,) can form important parts of the landscape, and provide a role in landscape buffering and planting, providing screening to restrict undesirable views. They can also play a role in contributing towards local distinctiveness and a sense of place. In this regard, Policy ILM2 requires development proposals to retain all significant trees and hedgerows, in addition to those with TPO designations. Policy ILM2 also includes several considerations for conserving and enhancing Ilminster's ecology, habitats, and wildlife. This is further discussed within the 'Biodiversity and Geodiversity' appraisal, presented above

## Historic Environment

- 5.29 The Neighbourhood Plan area has a rich and distinctive historic environment, as reflected by the presence of 154 listed buildings and the Ilminster Conservation Area, which is broadly linear in form, and extends from the town centre to the west and east.
- 5.30 A number of the sites allocated through the Neighbourhood Plan are within locations sensitive for the historic environment. Development at the following allocated sites have the potential to lead to impacts on the significance of listed buildings and/or the Ilminster Conservation Area.

**Site 12 (Land to the rear of New Wood House, The Beacon):** The site is located adjacent to the Ilminster Conservation Area, which is situated to the south. The section of the conservation area adjoining the site has been defined by the Conservation Area Appraisal as part of the New Road character area. The site is relatively screened from much of the conservation area (in part due to topography), so visual impacts from development on the site would be on the immediate area rather than the wider conservation area. However, the loss of open areas in this location would impact on views to and from the conservation area, in particular from properties on The Beacon.

**Site 23 (The Swan):** The site is located within the Ilminster Conservation Area. It is located in the Market Place, Cornhill, East and North Street sub-area defined in the Conservation Area Appraisal. The site is adjacent to three Grade II listed buildings: '2, East Street'; '8, East Street' (both of which are located to the north); and '1, Ditton Street'. Given the site is in the

immediate setting of these buildings within the conservation area, and the site is currently an open area, development at this location has the potential to have significant effects on the settings of these features of historic environment interest.

**Site 24 (Gooch and Housego):** The site is located within the Ilminster Conservation Area. It is located within the Market Place, Cornhill, East and North Street sub-area of the conservation area defined in the Conservation Area Appraisal. The site comprises a Grade II listed building, the '3 and 5, East Street;', which is a former shirt factory dating from 1916. The building is directly opposite to the Grade II listed Market House, and is adjacent to the Grade II listed '1, East Street'. Depending on the nature of proposals taken forward for this site, development of the building offers the potential to rejuvenate this feature of historic environment interest, if sensitively undertaken.

**Site 26 (Land East of Playing Field, Shudrick Lane):** The site is located approximately 100m south of the Ilminster Conservation Area. However, the site is screened in many respects from the conservation area by intermediate development on the north side of Shudrick Lane. Development on some sections of the site however has the potential to be visible from limited parts of the conservation area, including on Love Lane and Townsend, which is part of the Butts, Bay Hill and Townsend sub-area of the conservation area.

- 5.31 In addition, a number of the allocations have been reduced in size from those considered in Chapter 4 above to reflect local sensitivities. For example, the boundaries of allocated sites 15a and 22a are significantly smaller than those of Sites 15 and 22 considered in Chapter 4, covering less sensitive parts of the sites. If taken forward in their entirety, these sites would have led to impacts on the significance of the historic environment locally, including associated with the Ilminster Conservation Area.
- 5.32 Whilst the allocations outlined above are situated in locations with sensitivity for the historic environment, the Neighbourhood Plan policies otherwise provide a robust basis for the conservation and enhancement of the historic environment in Ilminster.
- 5.33 In this respect Policy ILM7 (Promote High Quality Design) seeks to ensure that all development in the Neighbourhood Plan area reflects the distinct characteristics of the town associated with its historic environment. A key component of the policy is the stipulation that development taken forward in the town is informed by the Design Guide prepared alongside the Neighbourhood Plan. The Design Guide identifies the distinctive characteristics of Ilminster, and for the key character areas within the town, sets out expected approaches relating to: layout and density; the street scene; building form; views and topography; landscape and roofscape; materials and detailing; and sustainable design. Central to the Design Guide is the historic environment, with a key focus being on the contribution the historic environment makes to local distinctiveness and character in different locations in the town.
- 5.34 Given the Design Guide is underpinned by a detailed consideration of key features and areas of historic environment value in Ilminster and their significance, and was informed in its development by robust evidence and engagement with the community, the Design Guide provides an appropriate basis for the conservation and enhancement of the historic environment in Ilminster.
- 5.35 A number of further Neighbourhood Plan policies seek to conserve and enhance the historic environment. Policy ILM11 (Preserve and Enhance the Historic Market Town Centre) seeks to encourage the town centre as "*a high quality, vibrant market destination and local amenity space befitting its important heritage status*" through delivering public realm improvements in the town. This will be further supported by Policy ILM10 (Welcome People to Ilminster), which seeks to improve the public realm at six key gateways to the town. Policy ILM15 (Design and Layout of Strategic Sites) sets out a range of provisions which are designed to be applied to the Local Plan strategic sites, namely on land South West of Canal Way and Station Road. This includes a reassertion that development on these strategic sites contribute positively to the area's character, scale, layout, height and form and conform with the design and heritage policies in the INP, including associated with the Design Guide. These policies will therefore support local distinctiveness and the setting of the historic environment in these locations.

- 5.36 Landscape character is a key component of the setting and integrity of Ilminster's historic environment. This is recognised by Policy ILM1 (Conserve and Enhance Ilminster's Historic Landscape Setting), which seeks to enhance views and vistas, particularly those containing heritage assets, through public realm improvements and carefully managed development. Through seeking to ensure all new development includes a strategic landscape plan and associated management for the whole site, the policy will also help ensure that such new development is sympathetic to the distinctive characteristics of the site, including in association with heritage assets. Additionally, the policy expects proposals to enhance views and vistas, including the twenty identified and protected views of Ilminster as defined in Figure 5 'Protected Views, Landscape Character and Designations' within the Neighbourhood Plan. This is important in the context of the proposed site allocations, as the following sites are within the sightline of at least one protected view: Site 12, Site 15A, Site 19, Site 26, and Site 31.
- 5.37 The INP also seeks to realise the wider opportunities afforded by Ilminster's rich historic environment resource. In this respect the Neighbourhood Plan has a close focus on utilising the town's heritage as a key asset for the economy and the community. For example, Policy ILM6 (Enhance Ilminster's Economy, Tourism and Heritage) seeks to utilise the town's historic environment as an important component for enhancing tourism offer in the town, reinforcing community vitality and the diversifying the economy. The Neighbourhood Plan policies also provide opportunities for enhancing the understanding and enjoyment of the town's historic environment resource. For example the development of the Green Chain in the Neighbourhood Plan area and the Neighbourhood Plan's focus on enhancing town-wide walking and cycling networks (discussed under the Health and Wellbeing and Transportation SEA themes below) will promote significant opportunities for the enjoyment of the town's historic environment.
- 5.38 The rich archaeological resource of Ilminster, which reflects the distinct historic evolution of the town is also a key historic environment asset. This is recognised by Policy ILM7 (Promote High Quality Design), which highlights that development proposals will be expected to be accompanied by an initial archaeological evaluation.
- 5.39 Overall, therefore, whilst the Neighbourhood Plan allocations are in a number of cases located in parts of the town with sensitivity for the historic environment, the Neighbourhood Plan policies provide a robust basis for the conservation and enhancement of the historic environment in Ilminster. The policies will also help with the realisation of the significant opportunities associated with the town's rich heritage resource, and support opportunities for the enhanced understanding and enjoyment of the historic environment locally.

## Land, Soil and Water Resources

- 5.40 Sites 23 (The Swan) and 24 (Gooch and Housego) comprise development on previously developed land. This will support the efficient use of land through facilitating the redevelopment and intensification of uses on land with existing development
- 5.41 However, the majority of the larger site allocations are entirely underlain by land classified as the best and most versatile agricultural land, including Site 15 (Land South of Shudrick Lane), Site 28 (Land east of Winterhay Lane), Site 25 (Land north of Station Road) and Site 26 (Land east of playing fields, Shudrick Lane). As such, development of these sites will lead to the loss of significant areas of productive agricultural land. It should be acknowledged though that opportunities for development on previously developed land in Ilminster are low. In this context, the Neighbourhood Plan seeks to make use of the previously developed land opportunities which are available.
- 5.42 A number of the policies seek to protect key features of landscape and biodiversity interest, key areas of open space, areas of landscape sensitivity and promote high quality landscaping and green infrastructure enhancements, such as the 'Green Chain' (as discussed under the 'Biodiversity' and 'Landscape' SEA themes above). While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including through the promotion of high-quality green networks in the Neighbourhood Plan area and the protection and enhancement of key landscape features.

This will help support the capacity of the landscape and villagescape to regulate soil and water quality.

- 5.43 With regards to minerals resources, the site allocations do not fall within the Minerals Safeguarding Areas highlighted in the Somerset Minerals and Waste Plan. This includes the building stone safeguarding area covering the north eastern part of Ilminster.

## Population and Community

- 5.44 The Neighbourhood Plan contains a range of policies which seek to support and enhance residents' quality of life in Ilminster.
- 5.45 Policy ILM12 (Amount and Location of New Homes) seeks to allocate 839 dwellings in Ilminster through sustainable and phased development, including meeting the affordable housing figures set out in the Adopted Local Plan. This is intended to meet the housing needs set out by South Somerset District Council, and therefore it is assumed that this quantum of dwellings will meet local demand for housing in Ilminster. In particular, the site at Canal Way (Site 10) has the potential to deliver a significant number of homes (400 dwellings). With regards to housing type and tenure, Policy ILM13 (Types of New Homes) specifies that at least 20% of new homes should be built to accessible and adaptable standards (i.e. they will meet the requirements of Building Regulations M4(2) Meeting Lifetime Home Standards). Additionally, larger sites (those that are more than 20 dwellings) will offer plots for self/custom build homes for at least 5% of dwellings on site, which must be marketed by a developer for a minimum of 12 months. Finally, a range of housing types designed to meet local need, such as one-bedroom flats, two-or three-bedroom bungalows and live-work units of differing proportions, dependent on market need. In summary, it is considered that Policy ILM13, will support the delivery of a suitable range of types and tenures of housing in the Plan area, and seek to meet local need.
- 5.46 Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. In this regard, Policy ILM4 (Enhance Recreational Facilities for our Growing Community) encourages the enhancement of facilities that will support the rising population in the Plan area by meeting necessary community needs and supporting community cohesion within the town. This is supported by Policy ILM5 (Allocate an Ilminster Environmental Enterprise Zone), which discusses the development of high-quality business 'hubs' as well as large-scale sport and/or leisure facilities and Policy ILM6, which supports improving services such as retail, and recreational areas in the town. As well as directly seeking to sustain and enhance community facilities, several policies seek to support accessibility to these services by strengthening public transport infrastructure and improving ease of access to retail centres. For example, Policy ILM8 (Encourage Shoppers and Visitors into Ilminster's Town Centre) specifies a number of measures to improve accessibility, including dropping curbs at key gateways to allow ease of access to shops and services in the town centre, making cycle routes more 'street friendly' and providing bus stops at more convenient locations is likely to encourage more residents to use the town centre. Policy ILM11 (Preserve and Enhance the Historic Market Town Centre) also supports enhancements to the pedestrian network such as safe crossings. Similarly, Policy ILM15 (Design and Layout of Strategic Sites) supports the improvement of pedestrian and cycle routes at sites, which will likely contribute towards bespoke active travel services for residents, to the benefit of their needs.
- 5.47 In general, the allocated sites are in relative proximity to Ilminster town centre, providing good access to key community services and facilities. Additionally, allocated sites are generally accessible to the public rights of way and green infrastructure network. This is likely to limit the need for residents to need to travel to amenities by the private car. A small handful of allocated sites in the south east are situated further from the centre and will require residents to travel further to reach these services, specifically: Greenway Farm, west of Listers Hill and Land to east of Greenway, Listers Hill. Bus services at these sites are predominantly good, however, which will alleviate difficulties in reaching key amenities. It is noted that one site in particular, (Land east of Winterhay Lane) is not well served by public transport routes, as bus routes are located approximately 500m to the south of the site along Station Road, and there are no footpaths passing through the site. Development here will require residents to travel 1.4km to reach amenities by foot, which is further than comparative allocated sites. It is anticipated,

however, that policies regarding transport accessibility will improve connections overall; these are discussed in more detail under the 'Transportation' SEA theme below.

- 5.48 The Neighbourhood Plan policies have a focus on improving the vitality of the local economy in Ilminster. In this respect Policy ILM5 (Allocate an Ilminster Environmental Enterprise Zone to the West of Ilminster) seeks to support the development of business hubs, specifically the development of an 'Environmental Enterprise Zone' in the western part of Ilminster. This is likely to positively contribute to employment opportunities locally through supporting the retention of existing jobs, providing the conditions for small and micro-enterprises to establish themselves and expand, and through diversifying the economic offer of the town. The Neighbourhood Plan's support for eco-tourism facilities in the Plan area through Policy ILM5, such as campsites, will also likely strengthen the visitor economy in Ilminster. Furthermore, the policies which seek to support the vitality of the town centre (discussed above) will also support employment and economic opportunities in Ilminster.
- 5.49 Overall, therefore, the Neighbourhood Plan has the potential to have significant positive effects in relation to the Population and Communities SEA theme through delivering housing which meets local needs, by enhancing accessibility to services and facilities, and through supporting the local economy.

## Health and Wellbeing

- 5.50 The focus of the Neighbourhood Plan policies with regards to the Health and Wellbeing theme are to support healthier modes of travel, including walking and cycling, and to create new recreational opportunities.
- 5.51 The majority of allocated sites provide reasonable access to healthcare services (Ilminster Medical Centre) at Canal Way and will therefore likely support the medical needs of residents. Alongside medical facilities, improving access to recreational facilities and/or open spaces in the Plan area will positively contribute towards improving the overall physical and mental health of residents. In this respect, Policy ILM4 (Enhance Recreational Facilities for our Growing Community) focuses on improving the health and wellbeing of residents through the delivery of a new indoor recreational facility at Canal Way (shown in Figure 2 of the Neighbourhood Plan).
- 5.52 A key positive effect on health and wellbeing from the Neighbourhood Plan's policies will be from their focus on protecting and enhancing the Neighbourhood Plan area's high-quality environment and public realm and green infrastructure provision. Green infrastructure provides space – including natural green space – for recreation and relaxation, and access to nature has been evidenced to improve people's physical and mental health and wellbeing, through encouraging healthy outdoor recreation and relaxation. In this respect the Neighbourhood Plan policies which support enhancements to greenspace and the natural environment will bring benefits for health and wellbeing. For example, Policy ILM3 (Enhance and Connect Local Green Open Spaces with a 'Green Chain') seeks to deliver a well signposted 'Green Chain' of designated local green spaces, whilst providing more facilities and equipment to encourage greater use of local green spaces by all age groups. It also seeks to ensure site allocations preserve and enhance existing, and create new, local green spaces and the 'Green Chain' network.
- 5.53 Beyond this, the Neighbourhood Plan has a strong focus on enhancing walking and cycling networks in Ilminster. Currently, sites are mostly well connected to the PRoW network and/or footpaths and the town's wider green infrastructure network. This ease of connectivity will encourage the use of healthy modes of travel. Though sites' access to cycle routes is currently variable, a number of policies seek to address this. Policy ILM5 (Allocate an Ilminster Environmental Enterprise Zone to the West of Ilminster), supports the provision of pedestrian and cycle routes within the Enterprise Zone to encourage healthy lifestyles through active travel. Policy ILM9 (Safe, Interesting Walking and Cycling Routes) addresses this more directly by seeking to sustain and enhance Sustrans Cycle Route 33, which runs through the centre of the town. The policy also seeks to provide safe walking routes for residents through widening pavements, providing dropped curbs at key junctions and safer road crossings. By focusing on active travel routes, collectively, these policies will support the health of wellbeing of residents

by promoting active travel modes and healthier lifestyles. This will be further supported by Policy ILM15 (Design and Layout of Strategic Sites) which seeks to encourage 'playing, walking and cycling' at residential sites.

- 5.54 In summary, the Plan's focus on improving green infrastructure networks and recreational opportunities in the town and enhancing active travel network will benefit residents' physical and mental health. In addition, the Neighbourhood Plan will support accessibility to healthcare services in the town.

## Transportation

- 5.55 In general, the allocated sites are in relative proximity to Ilminster town centre and bus services, providing good access to key community services and facilities. Additionally, the allocated sites are generally accessible to the public rights of way and green infrastructure networks. This is likely to limit the need for residents to need to travel to amenities using private vehicles. A small handful of allocated sites are situated further from the town centre and will require residents to travel further to reach these services by foot, including to the south of the town centre at Greenway Farm, west of Listers Hill and Land to east of Greenway, Listers Hill. However, the sites are accessible to bus services. It is noted though that one site, (Land east of Winterhay Lane) is not as well served by bus routes, which are located approximately 500m to the south of the site along Station Road, and is located 1.4km from the town centre, which is further than comparative allocated sites.
- 5.56 Overall, though, the Neighbourhood Plan policies have a close focus on improving accessibility by sustainable modes of transport. For example, Policy IL9 has a focus on enhancing walking and cycling routes in the town through seeking to deliver better signage, surfaces, road markings and priority at key junctions on the National Cycle Network and on providing "safe walking routes, defined as 'pavements and paths wide enough to meet demand, with dropped curbs at key junctions, sufficient lighting and safe road crossings'". The policy also seeks to direct part of the Community Infrastructure Levy to supporting such routes as part of the Green Chain. Reinforcing this further, Policy ILM3 seeks to provide well signposted routes as part of the Green Chain, incorporating safer road crossings and cycle facilities.
- 5.57 In the town centre, Policy ILM8 seeks to enhance the public realm and drop curbs at key gateways, in particular adjacent to The Market House, and support cycling, including through providing cycle-friendly streets, sensitively designed bicycle racks and signage and removing barriers on cycle paths. The policy also seeks to manage car traffic in the town centre and facilitate on street improvements associated with bus use. Policy ILM11 also seeks to facilitate public realm enhancements in the town centre and provide safe, level road crossings, with a shared surface approach where pedestrians have priority over vehicular traffic. This is further supported by Policy ILM7 (Promote High Quality Design), which seeks to support enhancements by improving walking and cycling connections between 'the conservation area, open countryside and other facilities'. Within the Ilminster Environmental Enterprise Zone covering the west of the town, Policy ILM5 seeks to deliver improved facilities for cyclists and walkers, including cycle hubs, visitor parking and new connections to public rights of way and the National Cycle Network.
- 5.58 Development sites will also be expected under Policy ILM15 to improve walking and cycling routes and support enhancements to the proposed Green Chain. This includes through providing "high quality cycle and pedestrian routes within the site linking to existing routes, in particular to Ilminster's town centre to prevent a car dominated environment." The policy further specifies the provision of cycle routes which link to existing routes, particularly those running through the town centre in order to 'ensure provision for their ongoing maintenance'.
- 5.59 In light of these policy provisions, the Neighbourhood Plan therefore has a close focus on enhancing accessibility for pedestrians and cyclists and for those utilising public transport networks.

## Conclusions at this current stage

- 5.60 The assessment has concluded that the current version of the Ilminster Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on delivering high quality housing which meets local needs, its focus on improving the quality of life of residents, its support for the economic and community vitality of the town, and its facilitation of green infrastructure enhancements. The Neighbourhood Plan also has the potential to lead to significant positive effects in relation to the 'Transportation' theme given its close focus on delivering enhanced walking and cycling networks, green infrastructure provision and public realm improvements in the town.
- 5.61 In terms of the 'Land, Soil and Water Resources' SEA theme, the allocations taken forward through the Neighbourhood Plan will lead to significant negative effects on soils resources. This is due to the required landtake on land classified as the 'best and most versatile' agricultural land. This loss should however be seen in the context of the lack of available previously developed land in Ilminster, and the Local Plan requirement for the town with regards to housing and employment delivery.
- 5.62 With regards to the 'Historic Environment' SEA theme, whilst the Neighbourhood Plan allocations are in a number of cases located in parts of the town with sensitivity for the historic environment, the Neighbourhood Plan policies provide a robust basis for the conservation and enhancement of the historic environment in Ilminster. The policies will also help with the realisation of the significant opportunities associated with the town's rich heritage resource, and support opportunities for the enhanced understanding and enjoyment of the historic environment locally. In terms of the 'Landscape' theme, whilst the allocation of the preferred sites has the potential to lead to impacts on landscape character locally, the Neighbourhood Plan has a close focus on conserving key views, protecting landscape and townscape character, and on enhancing green infrastructure networks. This provides an appropriate means of protecting and reinforcing local character in association with the delivery of the Local Plan's development requirement for the town.
- 5.63 The Neighbourhood Plan will also initiate a range of beneficial approaches regarding the 'Biodiversity and Geodiversity' and 'Climate Change' SEA themes. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan.

## 6. What are the next steps?

- 6.1 This Environmental Report accompanies the Pre-Submission version of the Ilminster Neighbourhood Plan for Regulation 14 consultation.
- 6.2 Following consultation, any representations made will be considered by the Neighbourhood Plan Steering Group, and the Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, South Somerset District Council, for subsequent independent examination.
- 6.3 At independent examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the South Somerset Local Plan.
- 6.4 If independent examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by South Somerset District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Ilminster Neighbourhood Plan will become part of the development plan for Ilminster town.

# Appendix A Context Review and Baseline

## A1 – Air Quality

### Context Review

Key messages from the National Planning Policy Framework (NPPF)<sup>25</sup> include:

- *‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.’*
- *‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.’*
- *New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.*

Published in January 2018 by the UK Government, ‘A Green Future: Our 25 Year Plan to Improve the Environment’<sup>26</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 ‘Clean Air’ and the policies contained within ‘Chapter 4: Increasing resource efficiency and reducing pollution and waste’ within the 25-year plan directly relate to the air quality SEA theme.

The Clean Air Strategy 2019 identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of ‘Clean Air Zones’.

At the local level, Policy EQ7 ‘Pollution Control’ within the Adopted South Somerset Local Plan (2006-2028) directly relates to the Air Quality theme.

### Summary of Current Baseline

South Somerset District Council is required to monitor air quality across the district under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

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<sup>25</sup> HM GOV (2018): ‘Revised National Planning Policy Framework’, [online] available to access via:

<<https://www.gov.uk/government/collections/revised-national-planning-policy-framework>> last accessed [18/03/20]

<sup>26</sup> HM GOV (2018): ‘A Green Future: Our 25 Year Plan to Improve the Environment’, [online] available to access via:

<[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)> last accessed [18/03/20]

Released in June 2018, the Air Quality Annual Status Report (ASR)<sup>27</sup> for South Somerset confirms that there is only one designated AQMA in the district, covering most of Yeovil town. The AQMA is designated for exceedances in the national air quality objectives for NO<sub>2</sub>, primarily along the main commuter routes in Yeovil. The ASR states that these areas have been consistently monitored for over the last decade, with NO<sub>2</sub> levels remaining relatively unchanged despite an increase in traffic flows.

Outside of these isolated hotspots in Yeovil, air quality in South Somerset is generally very good. The ASR acknowledges that this is largely due to the rural character of the district. However, the road network within the district is vulnerable to air pollution issues associated with congestion.

## Summary of Future Baseline

New housing and employment provision within the parish has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO<sub>2</sub>, particularly along the main routes through the Neighbourhood Plan area.

Implementation of the aims, objectives and policies contained in the Yeovil AQAP and the Local Transport Plan (further discussed in Chapter 10) present opportunities to continue to improve air quality within both the Neighbourhood Plan area and the wider district.

## A2 – Biodiversity and Geodiversity

### Context Review

At the European level, the EU Biodiversity Strategy<sup>28</sup> was adopted in May 2011 in order to deliver an established new Europe-wide target to ‘*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*’.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to ‘*contribute to protecting and enhancing our natural, built and historic environment*’ including by ‘*helping to improve biodiversity*.’
- ‘*Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.*’
- ‘*Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.*’
- ‘*To protect and enhance biodiversity and geodiversity, plans should:*
  - a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
  - b) *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

<sup>27</sup> South Somerset District Council (2018): Air Quality ASR [online] available to access via:

<https://www.southsomerset.gov.uk/services/environmental-health/air-quality-and-pollution/air-quality/>

<sup>28</sup> European Commission (2011): ‘Our life insurance, our natural capital: an EU biodiversity strategy to 2020’, [online] available to access via: <[http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP\\_resolution\\_april2012.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf)> last accessed [18/03/20]

The Natural Environment White Paper (NEWP)<sup>29</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*<sup>30</sup>.

The recently published 25 Year Environment Plan<sup>31</sup> sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably;
- Recovering nature and enhancing the beauty of landscapes;
- Connecting people with the environment to improve health and wellbeing;
- Increasing resource efficiency, and reducing pollution and waste;
- Securing clean, productive and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the biodiversity and geodiversity SEA theme.

At the Local level, several policies within the Adopted South Somerset Local Plan (2006-2028) directly relate to the Biodiversity and Geodiversity theme, including:

- **Policy EQ4:** Biodiversity;
- **Policy EQ5:** Green Infrastructure; and
- **Policy EQ6:** Woodland and Forest.

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<sup>29</sup> Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available to access via:

<<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [18/03/20]

<sup>30</sup> DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to access via: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed [18/03/20]

<sup>31</sup> HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) last accessed [18/03/20]

## Summary of Current Baseline

### European and Nationally designated sites

There are no European or nationally designated sites within or within proximity to the Neighbourhood Plan area. In the wider area, the nearest European designated site is located approximately 7.5km to the north east of the Neighbourhood Plan area, namely: Somerset Levels and Moors Ramsar and Special Protection Area (SPA). This site contains habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC). In recognition of the presence of this site, the Neighbourhood Plan is undergoing Habitats Regulations Assessment screening, which is being undertaken separately to this SEA process.

There are four Sites of Special Scientific Interest within 5km of the Neighbourhood Plan area, including: Hurcott Lane Cutting SSSI (to the north east); Seavington St Mary SSSI (to the east); Woolhayes Farm SSSI (to the south west); and Barrington Hill Meadows SSSI (to the north west). The Neighbourhood Plan area does not overlap with any SSSI Impact Risk Zones for residential, rural-residential or rural non-residential development types.

### Locally designated sites

Located within the central western section of the Neighbourhood Plan area, the 'Herne Hill' Local Nature Reserve was formally designated in 2018 and covers an area of approximately 8.25 ha. The citation for the LNR states<sup>32</sup>:

"The species composition of the woodland varies throughout, with the most prevalent tree and shrub species being ash (*Fraxinus excelsior*), pedunculate oak (*Quercus robur*), hazel (*Corylus avellana*), hawthorn (*Crataegus monogyna*), elder (*Sambucus nigra*) and holly (*Ilex aquifolium*).

"The field layer within the woodland includes bramble (*Rubus fruticosus*), bracken (*Pteridium aquilinum*), red campion (*Silene dioica*), dog's mercury (*Mercurialis perennis*), bluebell (*Hyacinthoides non-scripta*), primrose (*Primula vulgaris*) and lords-and-ladies (*Arum maculatum*).

"The ground layer of the woodland is dominated by common ivy (*Hedera helix*), lesser celandine (*Ranunculus ficaria*) along with substantial moss, liverwort, lichen and fungi communities.

"The area at the hill's summit is known as the Fir-Pound and is a plantation which consists of scots pine, sweet chestnut and beech trees. Even though these species are not local to this habitat, they should remain as a significant part of the site's history and ecology.

"Many parts of the woodland shrub layer are currently sparse, consisting of mostly bramble and bracken. It is proposed a section of these areas be managed to allow for other species, which require additional light, to germinate and thrive.

"Over 100 species of flowering plants have been recorded, including two Somerset notable species. Surveys have identified 46 species of insect including two nationally rare species and many with local status. The grassland area, Cleeve Close, contains several distinctive communities and a diverse flora, and is one of the most important sites on Herne Hill. The area includes bramble, knapweed, primrose, nettles, cocksfoot, false oat grass, Yorkshire fog and soft rush.

"The site provides a habitat for many animal species, including a large population of badgers and a substantial range of invertebrates and wild birds."

There are a variety of BAP Priority Habitats located within or within proximity to the Neighbourhood Plan area, including areas of coastal and floodplain grazing marsh, deciduous woodland, good quality semi-improved grassland and traditional orchard. The River Isle is a key component of the Neighbourhood Plan area's ecological network, covered by floodplain grazing marsh priority habitat.

The Neighbourhood Plan area has a rich geodiversity resource. A large county geological site covers much of the town, the boundaries of which are the old town walls. The extent of these areas is not

<sup>32</sup> South Somerset District Council (2018): 'Herne Hill Management Plan', [online] available to access via: <http://modgov.southsomerset.gov.uk/ieDecisionDetails.aspx?Id=830> last accessed [04/04/20]

clear as the exact locations of the walls are not mapped<sup>33</sup>. However, the old town walls are now the best place for clean exposures of the Middle Lias Moolstone, a ferruginous sand oolite limestone where the shelly fossils bivalves, brachiopods, ammonites and belemnites have been preserved within the rock.

**Figure A2.1** overleaf shows the designated wildlife sites and BAP priority habitats located within and in the immediate surroundings of the Neighbourhood Plan area.

## Summary of Future Baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the Neighbourhood Plan area and in the surrounding areas.

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<sup>33</sup> South Somerset District Council (2017): 'Ilminster Settlement Profile', [online] available to access via: <https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/local-plan-review-2016-2036/> last accessed [04/04/20]



## A3 – Climate Change

### Context Review

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It requires the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below<sup>34</sup> :

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

The UK Climate Change Act<sup>35</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050. The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to '*contribute to protecting and enhancing our natural, built and historic environment*' including by '*mitigating and adapting to climate change*' and '*moving to a low carbon economy*.' 'The

<sup>34</sup> GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to access via: <<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>> last accessed [18/03/20]

<sup>35</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [19/09/18]

planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.’

- *‘Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.’*
- *‘Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.’*
- Direct development away from areas at highest risk of flooding (whether existing or future). *‘Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.’*

The Clean Air Strategy released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

In May 2019, the UK Parliament declared a climate emergency, with a view to explicitly acknowledging that human activities are significantly affecting the climate, and actions to mitigate and adapt to climate change should be paramount. This declaration has been mirrored by several local planning authorities across the country.

The Flood and Water Management Act<sup>36</sup> highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).<sup>37</sup>

Further guidance is provided in the document ‘Planning for SuDS’.<sup>38</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of ‘contributing to local quality of life and green infrastructure’.

At the local level, the South Somerset Environment Strategy (published October 2019)<sup>39</sup> sets out the following vision for the district: *‘we wish to be a leading Council in developing and adopting a Green Agenda to promote sustainable environment, economy and communities.’* In addition, several policies

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<sup>36</sup> Flood and Water Management Act (2010) [online] available to access via:  
<<http://www.legislation.gov.uk/ukpga/2010/29/contents>> last accessed [18/03/20]

<sup>37</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

<sup>38</sup> CIRIA (2010): ‘Planning for SuDs – making it happen’, [online] available to access via:  
<[http://www.ciria.org/Resources/Free\\_publications/Planning\\_for\\_SuDS\\_ma.aspx](http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx)> last accessed [18/03/20]

<sup>39</sup> South Somerset District Council (2019): ‘South Somerset Environment Strategy’, [online] available to access via:  
<<https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/environment-strategy/>> last accessed [02/04/20]

within the Adopted South Somerset Local Plan (2006-2028) directly relate to the Climate Change theme, including:

- **Policy EQ1:** Addressing Climate Change in South Somerset;
- **Policy EQ5:** Green Infrastructure; and
- **Policy TA1:** Low Carbon Travel.

## Summary of Current Baseline

### Contribution to climate change

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that South Somerset has higher per capita emissions in comparison to the South West of England and England as a whole since 2005. The South Somerset Environment Strategy states that 42% of the district's carbon emissions are from transport, compared with 33% from domestic activities and 25% from industrial activities<sup>40</sup>.

### Potential effects of climate change

Following the success of the UK Climate Projections released in 2009 (UKCP09), the Met Office recently released the UK Climate Projections for 2018 (UKCP18).<sup>41</sup> UKCP18 provides the most up to date climate observations and projections out to 2100, using cutting-edge climate science. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50<sup>th</sup> percentile) for South West England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows<sup>42</sup>:

- The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
- The central estimate of change in annual mean precipitation of +10 to +20% in winter and -20% to -30% in summer.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for extraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and

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<sup>40</sup> Department for Business, Energy and Industrial Strategy (2019) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 [online], available from: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017> [accessed 24/03/20].

<sup>41</sup> Data released 26<sup>th</sup> November 2018 [online] available to access via: <https://www.metoffice.gov.uk/research/collaboration/ukcp> > last accessed [18/03/20]

<sup>42</sup> Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps> > last accessed [04/04/20]

- Flooding of roads.

## Flood risk

Most of the Neighbourhood Plan area is located within Flood Zone 1, showing that there is a <0.1% chance (1 in 1000) of river flooding in any given year. However, there are large areas of land surrounding the River Isle (western and north western section of the Neighbourhood Plan area) and Dowlish Brook (southern and south western section of the Neighbourhood Plan area) which are located within Flood Risk Zone 3 and have a >1% chance of being flooded each year<sup>43</sup>.

The key areas of surface water flood risk within the parish are located on the land adjacent to the main watercourses: the River Isle (western section), Dowlish Brook (southern section); and Shudrick Stream (passing through the town centre)<sup>44</sup>.

Completed by the Somerset County Council Lead Local Flood Authority in July 2017, the Flood Investigation Report (FIR)<sup>45</sup> for Ilminster confirms that an intense rainfall event occurred in July 2017 with at least 25mm of rain (20% of July's total rainfall) falling in less than one hour. This exceptional rainfall event was a large contributory factor to the flooding Ilminster experienced and the internal flooding of approximately ten properties in the town centre primarily resulting from surface water. The FIR also confirms that 21 historic flood events within the Neighbourhood Plan area between 1995-2017 were reported to the risk management authorities.

## Summary of Future Baseline

Climate change has the potential to increase sea level rise and increase the occurrence of extreme weather events in the Neighbourhood Plan area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

Widespread implementation of sustainable urban drainage systems (SuDS) could help reduce the risk from surface water runoff, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding wherever possible.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions. South Somerset's declaration of a climate and ecological emergency in 2019 will likely see greater focus on the role that plan-making can play in tackling harmful emissions.

## A4 – Landscape

### Context Review

The European Landscape Convention<sup>46</sup> of the Council of Europe promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention was adopted in October 2000 and is the first international treaty to be exclusively concerned with all dimensions of European landscapes.

Key messages from the National Planning Policy Framework (NPPF) include:

<sup>43</sup> GOV UK (2019): 'Flood Map for Planning', [online] available at: <<https://flood-map-for-planning.service.gov.uk/>> last accessed [18/03/20]

<sup>44</sup> GOV UK (2017): 'Long term flood risk assessment for locations in England', [online] available to access via: <<https://flood-warning-information.service.gov.uk/long-term-flood-risk/>> last accessed [18/03/20]

<sup>45</sup> Somerset County Council (2018): 'Ilminster Flood Investigation Report', [online] available to access via: <<https://www.somerset.gov.uk/waste-planning-and-land/flood-investigations/>> last accessed [04/04/20]

<sup>46</sup> Council of Europe (2000): 'European Landscape Convention', [online] available to access via: <<https://www.coe.int/en/web/landscape>> last accessed [18/03/20]

- Strategic policies should set out an overall strategy making provision for *'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'*
- Planning policies and decisions should ensure that developments *'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - i. *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
  - ii. *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
  - iii. *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'*

The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment" directly relates to the landscape SEA theme.

At the Local level, several policies within the Adopted South Somerset Local Plan (2006-2028) directly relate to the Landscape theme, including:

- **Policy EQ2:** General Development;
- **Policy EQ5:** Green Infrastructure;
- **Policy EP5:** Farm Diversification; and
- **Policy HG8:** Replacement Dwellings in the Countryside.

## Summary of Current Baseline

### Nationally protected landscapes

The Neighbourhood Plan area is not within or within proximity to a National Park, Area of Outstanding Natural Beauty (AONB) or any Green Belt land. The nearest nationally protected landscape, the Blackdown Hills AONB, is located approximately 5 km to the west of the Neighbourhood Plan area (at its nearest point).

### National character areas

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character. The Neighbourhood Plan area is within the Yeovil Scarplands NCA. The NCA profile for the 'Yeovil Scarplands' lists several key characteristics, with the following of relevance to the Neighbourhood Plan area<sup>47</sup>:

- Contrasting and varied but complementary rhythm of the scarps and vales, with the flatter margins of the Levels and Moors;
- Scattered woodlands, many on steeper scarp slopes and within deep 'goyles' (steep, narrow valleys) and wet valley floors;
- Conifer Plantations on Ancient Woodland Sites, relict orchards and poplar shelterbelts;

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<sup>47</sup> Natural England (2014): 'NE557: NCA Profile 140: Yeovil Scarplands', [online] available to access via: <http://publications.naturalengland.org.uk/publication/5731196449325056> last accessed [04/04/20]

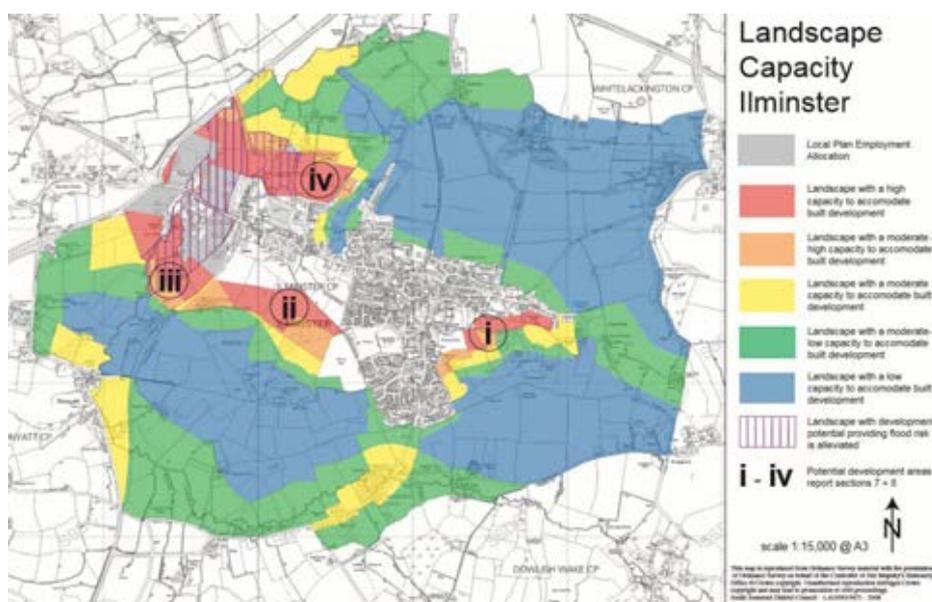
- Rural, agricultural character across the majority of the area, with distinct pastoral, mixed and arable areas;
- Several rivers draining east to west and a network of tributary streams, sometimes in goyles;
- Small villages and farmsteads contrasting sharply with urban and peri-urban Yeovil;
- Widespread earthwork remains, including medieval settlements, Roman villas and prehistoric forts, settlements and ritual sites;
- A range of principally Jurassic strata, particularly limestones and sandstones, giving rise to a suite of locally distinctive building stones, themselves imbuing distinctive local vernaculars;
- Relict open fields in the south-west contrasting with extensive thick hedgerows with frequent mature to veteran trees elsewhere; and
- Winding rural lanes, bounded by verges and hedgerows, connecting villages and hamlets cut across by busy A roads linking larger towns.

### Local landscape character

Landscape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape character can assist in the assessment of the likely significance of effects of change resulting from development and the value of landscape, both in visual and amenity terms.

South Somerset is a large, rural area that enjoys a high quality natural environment representing a wide range of landscapes and habitats; from flower rich calcareous grassland to acid heathland; wet fen and grazing marshes, rich in invertebrate and bird life; to hay meadows, bluebell woods, and orchards and parklands with veteran trees, supporting rare insects and lichens. These reflect the varied landscape and topography in the district, which in turn is underlain by an extensive and varied range of geological formations of limestones, clays and greensands<sup>48</sup>.

Completed to contribute to the evidence base for the currently Adopted South Somerset Local Plan (2006-2028), the Peripheral Landscape Study<sup>49</sup> for Iminster indicates the areas surrounding the town centre which have a low, low to moderate, moderate, or high capacity to accommodate new development. These areas are shown below in **Figure A4.1**



**Figure A4.1: Landscape capacity for the areas surrounding Iminster Town Centre**

<sup>48</sup> South Somerset District Council (2020): 'Landscape Architecture and our Local Landscape', [online] available to access via: <<https://www.southsomerset.gov.uk/services/planning/planning-technical-zone/heritage-conservation-landscape-and-archaeology/landscape-architecture-and-our-local-landscape/>> last accessed [04/04/20]

<sup>49</sup> South Somerset District Council (2007): 'Peripheral Landscape Study for Iminster', [online] available to access via: <[https://www.southsomerset.gov.uk/media/1812/peripheral-landscape-study\\_ilminster\\_amended.pdf](https://www.southsomerset.gov.uk/media/1812/peripheral-landscape-study_ilminster_amended.pdf)> last accessed [04/04/20]

## Tree preservation orders

Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity; the local planning authority will likely take into consideration the following criteria<sup>50</sup>:

- Visibility: the extent to which the trees or woodlands can be seen by the public; and
- Individual, collective and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

In this context, South Somerset District Council have allocated several TPOs within the Neighbourhood Plan area, shown below in **Figure A4.2**.



**Figure A4.2: TPOs (individual and areas) within the Neighbourhood Plan area<sup>51</sup>**

## Visual amenity

It is useful to note that the views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded overtime.

<sup>50</sup> GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via: <<https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas>> last accessed [18/03/20]

<sup>51</sup> South Somerset District Council (2020): 'Tree Preservation Orders', [online] available to access via: <<https://www.southsomerset.gov.uk/services/planning/planning-technical-zone/trees-and-hedges/tree-preservation-orders/>> last accessed [04/04/20]

The historic environment of Ilminster is also a key contributor to local character. This has been discussed in the next chapter.

## Summary of Future Baseline

New development has the potential to lead to incremental but small changes in landscape and townscape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

In the absence of the plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the Neighbourhood Plan area.

## A5 – Historic Environment

### Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- Heritage assets should be recognised as an *'irreplaceable resource'* that should be conserved in a *'manner appropriate to their significance'*, taking account of *'the wider social, cultural, economic and environmental benefits'* of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a *'positive strategy'* for the *'conservation and enjoyment of the historic environment'*, including those heritage assets that are most at risk.
- *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the historic environment SEA theme.

The Government's Statement on the Historic Environment for England<sup>52</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Historic England is the statutory body that helps people care for, enjoy and celebrate England's historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)<sup>53</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and

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<sup>52</sup> HM Government (2010): 'The Government's Statement on the Historic Environment for England', [online] available to access via: <[http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference\\_library/publications/6763.aspx](http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx)> last accessed [18/03/20]

<sup>53</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management: Advice Note 1', [online] available to access via: <<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [18/03/20]

- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>54</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2<sup>nd</sup> Edition) (December 2017)<sup>55</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>56</sup> outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

At the Local level, Policy EQ3 'Historic Environment' within the Adopted South Somerset Local Plan (2006-2028) directly relates to the Historic Environment theme. Likewise, the South Somerset Historic Environment Strategy<sup>57</sup> provides the mechanisms to ensure the Council continues to comply with the duties required by the primary legislation, which is the Planning Act 1990 (Listed Buildings and Conservation Areas); achieves the objectives for the protection and enhancement of the historic environment identified in the South Somerset Local Plan; and fulfils the requirement of the NPPF to set out a positive strategy for the conservation of the historic environment.

## Summary of Current Baseline

### Historic character of the Neighbourhood Plan area

The following paragraphs are taken from the Ilminster Conservation Area Appraisal (later discussed) and provide an overview of the historic character of the Neighbourhood Plan area.

Ilminster is situated along the southern side of a ridge close to the point at which the River Isle issues from the narrow valley formed between the Blackdown and Windwhistle foothills. The town is primarily a linear settlement aligned on an east-west axis, settled in the valley associated with the Shudrick Stream. The core of the town is concentrated upon the marketplace and church which lie between the stream and the lower slopes of Beacon Hill.

<sup>54</sup> Historic England (2016): 'SA and SEA: Advice Note 8' [online] available to access via: <<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>> last accessed [18/03/20]

<sup>55</sup> Historic England (2017): 'Setting of Heritage Assets: 2<sup>nd</sup> Edition', [online] available to access via: <<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>> last accessed [18/03/20]

<sup>56</sup> Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to access via: <<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>> last accessed [18/03/20]

<sup>57</sup> South Somerset District Council (2017): 'South Somerset Historic Environment Strategy', [online] available to access via: <<https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/historic-environment-strategy/>> last accessed [04/04/20]

The town's growth pattern has been dominated by the topography, and its economy by the availability of both fast flowing streams and level meadowland. The area is geologically complex, with marl, limestones, sandstones and chalk strata available for quarrying. There is some evidence of both prehistoric and Roman activity in the area, in the shape of isolated artefact finds. Unfortunately, these are not well provenanced and it is difficult to be certain whether the site of Ilminster itself was occupied in these periods.

Ilminster was extremely prosperous by the later medieval period. The town's prosperity was largely based on the textile industry, but it was also an important local market centre. Prosperity continued into the 18th century, and the town was both a market centre (noted for leather in the post-medieval period) and a centre of the cloth industry, ropemaking and gloving (though many of the actual sites of activity were in the outlying areas along the rivers). It was also surrounded by orchards.

Ilminster benefited from the increasing traffic on the turnpiked London to Exeter route which passed through the town. The town then thrived during the 19<sup>th</sup> century, aided by the arrival of the Chard Canal (briefly) and the railway. It now lies within commuting distance of larger towns such as Taunton and Yeovil and since the 1950s, its population has been steadily increasing.

## Designated heritage assets and areas

### Listed buildings

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains one Grade I, seven Grade II\* and 146 Grade II nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990. The Grade I and II\* listed buildings are as follows (as listed on Historic England's National Heritage List)<sup>58</sup>:

- The Parish Church of St Mary (Grade I);
- Nos. 2 and 3 and attached railings, gate piers and gates (Grade II\*);
- 28, Court Barton, Court Barton (Grade II\*);
- 29, Court Barton, Court Barton (Grade II\*);
- The Chantry (Grade II\*);
- Numbers 19-21, attached gateway and outbuildings to the rear of no. 19 (Grade II\*);
- Unitarian church and attached schoolhouse to the north (Grade II\*); and
- George Hotel (Grade II\*).

### Conservation areas

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England<sup>59</sup>.

In this respect, the Ilminster Conservation Area was designated in 1973 and covers most of the town centre. This includes the following seven distinctive zones: '1: The Central Area – Court Barton, Silver Street, High Street and West Street', '2: Market Place, Cornhill, East and North Streets', '3: Station Road', '4: The Butts, Bay Hill, Townsend and Knott Oak', '5: Ditton Street', '6: New Road' and '7: Love Lane'.

<sup>58</sup> Historic England (2020): 'National Heritage List – Advance Search', [online database] available to access via: <<https://historicengland.org.uk/listing/the-list/advanced-search>> last accessed [04/04/20]

<sup>59</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [18/03/20]

Completed in 2016, the Ilminster Conservation Area Appraisal lists the following summary of the special interest and key characteristics<sup>60</sup>:

- Tight urban grain with well contained streets dominated by good quality listed buildings
- Sloping topography of the core town and views out to adjacent hills and open countryside;
- Distinctive widespread use of local Moolham marlstone;
- High quality ashlar stone houses and many historic shop fronts;
- The Market a key focal point in the Market Place;
- Minster Church of St Mary enclosed within its urban churchyard;
- The church tower rising over the town and a feature visible from many points;
- Widespread use of ironwork in railings and cresting to shopfronts;
- Regency houses with roundarched central 1st floor windows; and
- Fine Ham stone door cases with broken pediments.

### Locally important heritage features

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.

Following a high-level review of the Historic Environment Record (HER) for Somerset, accessed via the Heritage Gateway<sup>61</sup>, there are 268 records within Ilminster Parish which identifies the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place of the Neighbourhood Plan area. This includes several WW2 pillboxes and anti-tank ditches, archaeological finds and settlements dating to several periods (Medieval, Post-Medieval, Bronze Age, Neolithic, Roman, and Iron Age), and many buildings located within Ilminster Town Centre.

There are also several archaeological sites and areas across South Somerset including two that intersect with Ilminster, namely: Chard Canal, and the Taunton to Chard railway<sup>62</sup>. Furthermore, the South Somerset Historic Environment Strategy outlines that there are several areas of high archaeological potential across the wider district.

### Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2019 Heritage at Risk Register for South West England<sup>63</sup>, none of the heritage assets within the Neighbourhood Plan area considered to be 'at risk'.

It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether the Grade II listed building within the Neighbourhood Plan area are at risk.

**Figure A5.1** (overleaf) shows the location of the Ilminster Conservation Area and the listed buildings within and within the immediate vicinity of the Neighbourhood Plan area.

<sup>60</sup> South Somerset District Council (2016): 'Ilminster Conservation Area Appraisal', [online] available to access via: <https://www.southsomerset.gov.uk/media/2656/ilminster-conservation-area-appraisal.pdf> last accessed [04/04/20]

<sup>61</sup> Heritage Gateway (2020): 'Historic Environment Record for Somerset', [online database] available to access via: <https://www.heritagegateway.org.uk/gateway/> last accessed [04/04/20]

<sup>62</sup> South Somerset District Council (2017): 'Ilminster Settlement Profile', [online] available to access via: <https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/local-plan-review-2016-2036/> last accessed [04/04/20]

<sup>63</sup> Historic England (2019): 'Heritage at Risk Register for South West England', [online] available to access via: <https://historicengland.org.uk/images-books/publications/har-2019-registers/> last accessed [04/04/20]

## Summary of Future Baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' heritage significance.



## A6 – Land, Soil and Water Resources

### Context Review

The EU's Soil Thematic Strategy<sup>64</sup> presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
- Ensure the progressive reduction of groundwater pollution; and
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

Key messages from the NPPF include:

- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - i. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
  - ii. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*
- *'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'*
- Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

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<sup>64</sup> European Commission (2006): 'Soil Thematic Policy', [online] available to access via: [http://ec.europa.eu/environment/soil/index\\_en.htm](http://ec.europa.eu/environment/soil/index_en.htm) last accessed [18/03/20]

Along with the policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the land, soil and water resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England<sup>65</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>66</sup>, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

In terms of waste management, the Government Review of Waste Policy in England<sup>67</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. The National Waste Management Plan<sup>68</sup> provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive<sup>69</sup>. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

Adopted in February 2015, the Somerset Minerals Plan DPD sets out how and broadly where minerals will be worked in Somerset until the year 2030. The document covers all land-based minerals in Somerset, with detailed information on the following mineral types:

- Aggregates – such as crushed rock;
- Building stone – such as Ham stone and blue lias;
- Peat; and
- Energy minerals – including oil and gas.

The Plan considers Somerset's contribution to the adequate and steady supply of aggregates (linked with national and local requirements for minerals), the safeguarding of mineral resources, and reclamation of sites; and it provides a detailed framework for assessing potential impacts of mineral development on the natural and historic environment<sup>70</sup>.

Implemented in 2016, the South West River Basin District Management Plan<sup>71</sup> aims to provide a framework for protecting and enhancing the benefits provided by the water environment. Principally, by 2021 the Management Plan predicts that an additional 44 water bodies will have achieved 'good' status. The Neighbourhood Plan area is located within the 'South and West Somerset' catchment area, with the following three themes considered to be the priority management issues for this catchment area within the River Basin District Management Plan:

- Flooding;
- Diffuse and point source pollution from rural areas; and
- Physical modification / fish passage issues.

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<sup>65</sup> Defra (2009): 'Safeguarding our Soils: A strategy for England', [online] available to access via: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [18/03/20]

<sup>66</sup> Defra (2011): 'Water for life (The Water White Paper)', [online] available to access via: <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [18/03/20]

<sup>67</sup> Defra (2011): 'Government Review of Waste Policy in England', [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [18/03/20]

<sup>68</sup> DEFRA (2013) Waste Management Plan for England [online] available to access via: <[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265810/pb14100-waste-management-plan-20131213.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf)> last accessed [18/03/20]

<sup>69</sup> Directive 2008/98/EC

<sup>70</sup> Somerset County Council (2015): 'Somerset Minerals Plan DPD' [online] available to access via: <<https://www.somerset.gov.uk/waste-planning-and-land/somerset-minerals-plan/>> last accessed [04/04/20]

<sup>71</sup> GOV.UK (2016): 'South West River Basin District Management Plan', [online] available to download via: <<https://www.gov.uk/government/publications/south-west-river-basin-district-river-basin-management-plan>> last accessed [04/04/20]

At the Local level, several policies within the Adopted South Somerset Local Plan (2006-2028) directly relate to the Land, Soil and Water Resources theme, including:

- **Policy SS7:** Phasing of Previously Developed Land;
- **Policy HG10:** Removal of Agricultural and Other Occupancy Conditions; and
- **Policy EQ7:** Pollution Control.

## Summary of Current Baseline

### Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

In terms of the location of the best and most versatile agricultural land, a detailed classification has been undertaken for the areas of undeveloped land surrounding Ilminster Town Centre. In this respect, there are several areas of Grade 2 and Grade 3a agricultural land surrounding Ilminster town centre which is some of the BMV areas of land for agricultural purposes. Likewise, based on the results of the 'Predictive BMV Land Assessment'<sup>72</sup>, the areas of undeveloped land to the south east, south, west, and north west of the parish have a moderate likelihood (20-60%) of containing BMV land. Comparatively, the areas of undeveloped land to the north, north east, and east of the parish have a high likelihood (greater than 60%) of containing BMV land.

### Water resources and quality

The water resources located within and within proximity to the Neighbourhood Plan area include the River Isle (western section), Dowlish Brook (southern section) and Shudrick Stream (passing through the town centre).

The Neighbourhood Plan area is located within the South West River Basin District, primarily overlapping with the 'Parrett' Operational Catchment. There are ten water bodies within the 'Parrett' Operational Catchment, two of which are identified as flowing through the Neighbourhood Plan area, namely: 'Isle – Upper to conf Cad Bk' and 'Dowlish Brook'

As shown on the Environment Agency's Catchment Data Explorer, the most recently completed water quality assessments undertaken in 2016 classifies the 'Isle – Upper to conf Cad Bk' as having a 'moderate' ecological status and a 'good' chemical status. The 'reasons for not achieving good status' (RNAGs) are primarily attributed to sewage discharge and poor livestock management<sup>73</sup>. Similarly, the most recently completed water quality assessments undertaken in 2016 also classify the 'Dowlish Brook' as having a 'moderate' ecological status and a 'good' chemical status'. The RNAGs are primarily attributed sewage discharge, poor soil management and poor livestock management.

There are no water quality assessments listed on the Environment Agency's Catchment Data Explorer for the Shudrick Stream.

### Mineral resources

Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals

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<sup>72</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land - Strategic scale map South West Region (ALC018)', [online] available to access via: <http://publications.naturalengland.org.uk/publication/5624668800679936?category=5208993007403008> last accessed [04/04/20]

<sup>73</sup> Environment Agency (2016): 'Catchment Data Explorer: Isle – Upper to conf Cad Bk', [online] available to access via: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB108052015190> last accessed [04/04/20]

development does not needlessly prevent the future extraction of mineral resources, of local and national importance<sup>74</sup>.

The Somerset Minerals Plan confirms that the Neighbourhood Plan area contains areas of land within the 'Building Stone' Mineral Safeguarding Area (MSA). The areas are predominantly located directly to the north and the south of Ilminster Town Centre. However, there are also two smaller areas of land to the south west of the town (between Herne Hill and Coldharbour Farm) which are also within the boundaries of the Building Stone MSA.

## Summary of Future Baseline

Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

Due to the prevalence of BMV agricultural land within sections of the undeveloped areas of the parish, new developments which are located outside of the settlement will likely lead to losses of higher quality (best and most versatile) agricultural land.

Furthermore, the housing requirement for Ilminster proposed through the emerging South Somerset Local Plan Review has the potential to impact upon the integrity of the MSA within the parish if poorly located.

## A7 – Population and Community

### Context Review

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- To support the Government's objective of significantly boosting the supply of housing, strategic policies *'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

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<sup>74</sup> GOV.UK (2014): 'Minerals Guidance', [online] available to access via: <<https://www.gov.uk/guidance/minerals>> last accessed [18/03/20]

- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a '*sufficient choice of school places*' and taking a '*proactive, positive and collaborative approach*' to bringing forward '*development that will widen choice in education*'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>75</sup> warns that society is underprepared for an ageing population. The report states that '*longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises*'. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

At the Local level, several policies within the Adopted South Somerset Local Plan (2006-2028) directly relate to the Population and Community theme, including:

- **Policy PMT3:** Ilminster Direction of Growth;
- **Policy SD1:** Sustainable Development;
- **Policy SS1:** Settlement Strategy;
- **Policy SS4:** District Wide Housing Provision;
- **Policy SS6:** Infrastructure Delivery;
- **Policy EP1:** Strategic Employment Sites;
- **Policy EP3:** Safeguarding Employment Land;
- **Policy EP8:** New and Enhanced Tourist Facilities;
- **Policy EP9:** Retail Hierarchy;
- **Policy EP11:** Location of Main Town Centre Uses;
- **Policy EP15:** Protection and Provision of Local Shops, Community Facilities and Services;
- **Policy EQ2:** General Development;
- **Policy HW1:** Provision of Open Space, Outdoor Playing Space, Sports, Cultural and Community Facilities in New Development;
- **Policy HW3:** Protection of Play Spaces and Youth Provision; and
- **Policy HG7:** Gypsies, Travellers and Travelling Showpeople.

## Summary of Current Baseline

### Population

The population of Ilminster increased by approximately 27.0% between 2001 and 2011, greater than the average increases for South Somerset (6.8%), the South West of England (7.3%) and England (7.9%). Approximately 3.6% of the population of South Somerset district live within the Neighbourhood Plan area<sup>76</sup>.

Additionally, the population density of Ilminster (9.9 persons/ha) is greater than the overall density for South Somerset as a whole (1.7 persons/ha).

<sup>75</sup> Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?', [online] available to access via: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [18/03/20]

<sup>76</sup> ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

## Age structure

Generally, there is a higher proportion of residents within the 60+ age category within the Neighbourhood Plan area (31.4%) in comparison to the proportions for South Somerset (29.2%), the South West of England (26.4%) and England (23.3%). This indicates that Ilminster has an ageing population.

A lower proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (40.9%) in comparison to the totals for South Somerset (43.1%), the South West of England (44.7%) and England (46.9%).

Additionally, 27.7% of residents within the Neighbourhood Plan area are within the younger age categories (0-15 and 16-24), lower than the percentages for South Somerset (27.8%), the South West of England (28.9%) and England (30.8%)<sup>77</sup>.

## Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long-term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Based on 2011 Census data, a higher percentage of households are deprived within the Neighbourhood Plan area in comparison to the totals for South Somerset. However, these deprivation levels are lower than the percentages for the South West of England and England. Most of the households in the Neighbourhood Plan area are deprived in one or two dimensions, which is similar to the regional and national trends<sup>78</sup>.

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - a. 'Geographical Barriers': relating to the physical proximity of local services
  - b. 'Wider Barriers': relating to access to housing, such as affordability.

<sup>77</sup> ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

<sup>78</sup> ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  - 'Indoors Living Environment' measures the quality of housing.
  - 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
  - Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
  - Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)<sup>79</sup> are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

In this respect, the Neighbourhood Plan area contains three LSOAs. An overview of the LSOAs is provided in **Table A7.1** below.

**Table A7.1: IMD data for the LSOAs wholly or partly within the Neighbourhood Plan area**

South Somerset LSOA	019A	019B	019C
<b>Overall IMD</b>	<b>50% most deprived</b>	<b>30% least deprived</b>	<b>50% least deprived</b>
Income Deprivation	50% most deprived	40% least deprived	50% most deprived
Employment Deprivation	50% most deprived	30% least deprived	30% most deprived
Education, Skills and Training	30% most deprived	50% least deprived	50% most deprived
Health Deprivation and Disability	40% least deprived	30% least deprived	50% least deprived
Crime	50% least deprived	30% least deprived	40% least deprived
Barriers to Housing and Services	40% most deprived	50% most deprived	40% most deprived
Living Environment	30% most deprived	30% least deprived	40% least deprived
Income Deprivation Affecting Children	40% least deprived	30% least deprived	40% most deprived
Income Deprivation Affecting Older People	50% most deprived	40% least deprived	50% least deprived

## Housing tenure

Within the Neighbourhood Plan area, 70.1% of residents either own their home outright or with a mortgage, broadly aligning with the total for South Somerset but higher than the regional and national trends<sup>80</sup>.

A lower proportion of residents live within privately rented and social rented housing in Ilminster and South Somerset in comparison to the regional and national figures.

Similarly, a lower percentage of residents in the Neighbourhood Plan area live in rent-free accommodation in comparison to the regional and national trends.

<sup>79</sup> DCLG (2019): Indices of Deprivation Explorer', [online] available to access via: <[https://dclgapps.communities.gov.uk/imd/iod\\_index.html](https://dclgapps.communities.gov.uk/imd/iod_index.html)> last accessed [18/03/20]

<sup>80</sup> ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

## Education

Based on the 2011 Census data, 23.7% of residents in the Neighbourhood Plan area have no qualifications, higher than the totals for South Somerset (21.9%), the South West of England (20.7%) and the total for England (20.7%)<sup>81</sup>.

Comparatively, 23.9% of residents within the Neighbourhood Plan area have a Level 4 qualification or above, which is lower than the total for South Somerset (25.0%), the South West of England (27.4%) and the total for England (27.4%).

## Employment

Regarding employment within the Neighbourhood Plan area, the following three occupation categories support the most residents<sup>82</sup>:

- Skilled trade occupations (18.3%);
- Professional occupations (14.6%); and
- Caring, leisure and other service occupations (11.5%).

Overall, 44.4% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, higher than the totals for South Somerset (41.3%), the South West of England (39.7%) and England (38.2%).

## Community assets

The Neighbourhood Plan area has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the Parish's sense of identity. Such facilities include: The Royal Oak public house; Summervale Surgery; post office and local supermarkets; The Minster Rooms (functions and events space); Ilminster Recreation Ground; Ilminster Town Hall; Herne Hill; The Beacon; and Swanmead Community School.

The Ilminster Community Plan (2016- 2026)<sup>83</sup> identifies the priorities of the residents of Ilminster and specifies areas for improvement at the local level. The results of the survey indicate that up to 54% of residents felt that Ilminster needed more community facilities, with the majority of respondents noting the need for more sport and recreational centres. Recreational space is a key factor in improving the physical and mental wellbeing of residents within a community area.

## Summary of Future Baseline

As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community and economy of certain parts of the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities.

The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

Furthermore, the dualling of the A303 and the A358 from the A303 at Southfields roundabout, along with proposed improvements to junction 25 of the M5, will significantly enhance road connectivity to the motorway network<sup>84</sup>. This will give Ilminster a strategic offer to businesses and commuters, affecting the growth potential of the town.

<sup>81</sup> ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

<sup>82</sup> ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

<sup>83</sup> Ilminster Parish Council (2016): 'Ilminster Community Plan' [online] available at:

[https://ilminsterweb.com/Pages/Documents/Publications/Ilminster\\_Community\\_Plan\\_2016\\_2026.pdf](https://ilminsterweb.com/Pages/Documents/Publications/Ilminster_Community_Plan_2016_2026.pdf) [accessed 25/03/20].

<sup>84</sup> South Somerset District Council (2015): 'Infrastructure Delivery Plan 2015/16', [online] available to access via:

<https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/local-plan-review-2016-2036/> last accessed [04/04/20]

## A8 – Health and Wellbeing

### Context Review

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *‘support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.’*
- *‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.’*
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>85</sup> (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

At the local level, the ‘Improving Lives in Somerset’ Strategy<sup>86</sup> outlines the vision and priorities for the county as a whole in relation to maintaining and improving the physical and mental wellbeing of residents. The following key priorities are outlined in the strategy:

- County infrastructure that drives productivity, supports economic prosperity and sustainable public services;
- Safe, vibrant and well-balanced communities able to enjoy and benefit from the natural environment;
- Fairer life chances and opportunity for all; and
- Improved health and wellbeing and more people living healthy and independent lives for longer.

Several policies from the Adopted South Somerset Local Plan (2006-2028) directly relate to the Health and Wellbeing theme, including:

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<sup>85</sup> The Marmot Review (2011): ‘The Marmot Review: Implications for Spatial Planning’, [online] available to access via: <https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf> last accessed [18/03/20]

<sup>86</sup> Somerset Health and Wellbeing Board (2019): ‘Improving Lives in Somerset Strategy’ [online] available from: <https://somerset.inconsult.uk/consult.ti/ImprovingLives/consultationHome> [accessed 25/03/20].

- **Policy EQ5:** Green Infrastructure; and
- **Policy HW1:** Provision of Open Space, Outdoor Playing Space, Sports, Cultural and Community Facilities in New Development.

## Summary of Current Baseline

### Joint Strategic Needs Assessment

The Somerset Health and Wellbeing Board's Joint Strategic Needs Assessment (2017- 2018)<sup>87</sup> contains information surrounding the wider determinants of residents' health and wellbeing. The following key points summarise the main issues raised in the assessment:

- The rapidly ageing population of Somerset is expected to see a continued rise in ill health over the coming years;
- The main cause of early death in Somerset is cancer, followed by circulatory disease;
- The third most common cause of death in Somerset are those induced by drug use and poor mental health (i.e. suicide);
- Poor mental health accounts for approximately 25% of illnesses within Somerset; and
- Somerset performs poorly in relation to social mobility (with regards to the momentum of children from disadvantaged backgrounds in further education).

### Public Health Profile for Somerset

Public Health England (PHE) published the Health Profile for South Somerset in 2019<sup>88</sup>, which provides an indication of the health needs of the community. Key problematic trends include:

- The rate for alcohol-specific hospital admissions among those under 18 is 51, worse than the average for England;
- The rate for self-harm hospital admissions is 392, worse than the average for England. This represents 580 admissions per year; and
- Estimated levels of excess weight in adults (aged 18+) are worse than the England average.

### Health indicators and deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 8. Based on 2011 Census data, 80.7% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', lower than the total for South Somerset (81.4%), the South West of England (81.4%) and England (81.4%). Similarly, 4.4% of residents in the Neighbourhood Plan area consider themselves to have 'bad health' or 'very bad health', lower than the total for Ilminster (4.8%), the South West of England (5.2%) and England (5.4%)<sup>89</sup>.

The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' is greater than the total for South Somerset but broadly aligns to the totals for the South West of England and England<sup>90</sup>. 18.5% of residents in the Neighbourhood Plan area confirm that their activities are limited in some way. This is higher than the totals for South Somerset (18.2%), the South West of England (18.4%) and England (17.6%).

<sup>87</sup> Somerset County Council (ca 2017): Joint Strategic Needs Assessment (JSNA) [online] available from: <http://www.somersetintelligence.org.uk/jsna/> [accessed 25/03/20].

<sup>88</sup> Public Health England (2019): 'Profile for Somerset' [online] available from: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e1000027.html?area-name=somerset> [accessed 26/03/20].

<sup>89</sup> ONS (no date): Census 2011: 'General Health 2011' (Table QS302EW)

<sup>90</sup> ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

## Summary of Future Baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way.

However, an ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e. elderly population).

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

Poor mental health is associated with low long term life quality, a larger number of hospitalisations and deaths. Experts indicate that problems surrounding the worsening of mental health, including secondary dependencies such as alcoholism are likely to worsen over time without suitable changes within communities.

## A9 – Transportation

### Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Key messages from the NPPF include:

- *'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
  - i. *The potential impacts of development on transport networks can be addressed;*
  - ii. *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;*
  - iii. *Opportunities to promote walking, cycling and public transport use are identified and pursued;*
  - iv. *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and*
  - v. *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'*

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the Somerset Future Transport Plan (FTP) (2011- 2026) outlines the long term strategy for *'getting the best from transport'*<sup>91</sup> and replaces Somerset's Second Local Transport Plan. The supporting policy documents include: 'Policy Document – Schedule of Policies', 'Policy Document – Transport and Development' and 'Policy Document – Implementation Plan 2013 – 2017' and explain how the FTP will be put into action. Additionally, several policies within

<sup>91</sup> Somerset County Council (n.d.): 'Future Transport Plan' [online] available from: <https://www.somerset.gov.uk/roads-and-transport/future-transport-plan/> [accessed 26/03/20].

the Adopted South Somerset Local Plan (2006-2028) directly relate to the Transportation theme, including:

- **Policy TA1:** Low Carbon Travel;
- **Policy TA4:** Travel Plans; and
- **Policy TA5:** Transport Impact of New Development.

## Summary of Current Baseline

### Rail network

The Neighbourhood Plan area is not connected to the national railway network. The closest railway station is in Taunton which is located approximately 14 km to the north west of Ilminster. Taunton station has good connections, including to London Paddington, Reading, Westbury, Exeter, Plymouth and Cornwall via Great Western Railway, and Bristol, the midlands and the north via Cross Country Trains. It is also relatively accessible to the South West Railway line at Yeovil, with connections to Salisbury, Andover, Basingstoke and London Waterloo.

### Bus network

Ilminster has several bus services that serve locations within Ilminster town centre. Three services are maintained by Somerset council (S1-S3), whilst the remaining services are run by private bus companies. These are as follows:

- Route 30: Taunton to Axminster;
- Route 624: Bridgewater College to Chard;
- Route 9: Donyatt to Crewkerne;
- Route S1: Ashill to Ilminster;
- Route S2: Shepton Beauchamp to Ilminster;
- Route S3: Ilton to Ilminster; and
- Superfast 2: Taunton to London.

However, the frequency of services is variable, with some running hourly during commuting hours (7am-7pm), and others only once per day on selective days.

### Road network

The Neighbourhood Plan area is located close to the A303, which forms part of a key arterial route between Exeter, Somerset, Wiltshire and London. It is also accessible to the A358, which links Ilminster with Taunton and the M5. The intersection of these two key routes is linked by a roundabout located toward the north western corner of the parish.

The main route passing through Ilminster Town Centre is the B3168 (station road). The B3168 is commonly used as a link between the A303 (at Horton and Ilminster) to the A378 (Curry Rivel and Langport).

There is also a network of 'C' roads within Ilminster Town Centre and rural country lanes in the southern section of the Neighbourhood Plan area, connecting to the surrounding settlements of Kingstone, Dowlish Wake, Cudworth and Chaffcombe.

### Cycle and footpath network

There are two designated cycle routes that pass directly through Ilminster. These include the National Cycle Network Route 33: Chard to Ilminster (and Bridgwater)<sup>92</sup>, along with the regional route 30.

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<sup>92</sup> Sustrans (2020): 'National Cycle Network Map', [online] available to access via: <<https://www.sustrans.org.uk/find-a-route-on-the-national-cycle-network/chard-to-ilminster-and-bridgwater/>> last accessed [04/04/20]

The Neighbourhood Plan area is also well connected by a network of Public Rights of Way (PRoW). The network connects to Herne Hill and Beacon Hill (both local viewing points over the town) and provides a scenic route alongside the River Isle.

### Availability of cars and vans

Based on 2011 Census data, 83.2% of households in the Neighbourhood Plan area have access to at least one car or van, lower than the total for South Somerset (85.3%) but higher than the totals for the South West of England (81.1%) and England (74.2%)<sup>93</sup>.

Likewise, the total number of households in the Neighbourhood Plan area with access to at least two cars or vans (35.9%) is lower than the totals for South Somerset (42.0%) and the South West of England (37.6%), but higher than the total for England (32.0%).

### Travel to work

The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (45.6%) which is higher than the totals for South Somerset (44.9%), the South West of England (41.4%) and England (37.0%)<sup>94</sup>.

The total percentage of residents in the Neighbourhood Plan area choosing to catch a train, bus, minibus, coach, cycle, or walk to work (14.1%) is higher than the percentage for South Somerset (13.2%) but lower than the regional and national trends (15.5% and 17.0%).

### Summary of Future Baseline

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e. rush hours). This is particularly significant in the local context, due to the pressures from the local road networks.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

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<sup>93</sup> ONS (no date): 'Car or Van Availability 2011', (Table QS416EW)

<sup>94</sup> ONS (no date): Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

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