

Draft Core Strategy (incorporating Preferred Options) October 2010
Summary of issues - Part 5 - Transport, Health and Well Being, Environmental Quality and Implementation & Monitoring

Policy/Paragraph/Section	Summary of Issues	Officer Comment	Recommendation
Core Strategy chapter	Representation	Comment	Recommendation
Transport and Accessibility	* An overview of chapter 10 would reduce the incorrect impression that issues such as cycle parking are being omitted. Better signposting is needed between related policies located in separated sections.	Chapter 10 - Transport and Accessibility, which is clearly headed and included in the Table of Contents, considers transport for the whole District. There are separate sections on transport in both the Yeovil Chapter (5) and the section on Chard in the Market Towns Chapter (6) because they are larger settlements, where more significant development is envisaged, and hence have greater potential to realise modal shift. A transport overview specifically for each settlement would mean considerable duplication, and would be of little benefit.	No Change.
Transport and Accessibility (paras 10.1 - 10.7))	*Environment Agency support all the policies and proposals in this chapter.	Support noted.	No Change.
	*Traffic has not been considered.	Traffic is considered in Chapter 10 Transport & Accessibility.	No Change.
	*Support the implementation of planned development improvements that can make modal shift a reality for the 3 existing key sites.	Support noted.	No Change.
	*Much of this section is geared towards larger scale development.	Chapter 10 - Transport and Accessibility covers all scales of development, however the degree of modal shift will always tend to be greater in larger settlements where more significant development is envisaged.	No Change.

	<p>* Support para 10.7 but consider that greater emphasis on freight should be made.</p>	<p>Noted - Increasing freight traffic by rail can reduce CO2 and HGV traffic on the strategic road network and there should be a general presumption for the protection of the rail network for future freight use. Modern rail freight can be very effective when rail freight terminals with dedicated sidings and/or container terminals can be designed into developments that manufacture or distribute goods. However facilities for rail transfer are needed at/near the point of origin of the goods and at the destination, this and the nature of the goods should be considered in any feasibility. The locations and layout of the passenger stations in South Somerset are not always conducive to modern freight operation. The resulting additional lorry journeys where they occur on rural roads would impact on local congestion and it's difficult to see how this could be achieved without additional major highway works in often sensitive locations.</p>	<p>Amend text to include a new paragraph in respect of rail freight to include the points outlined in the Officer response. Also amend Policy TA1 to include "where possible general industrial and storage and distribution sites should consider bespoke rail freight terminals where these are feasible and where suitable rail freight hubs can easily be constructed to enable easy road/rail interchange".</p>
	<p>* Impact of development on freight transport does not appear to have been addressed in the document - should deal with freight parking, effective deliveries in busy areas route planning.</p>	<p>Rail freight is therefore much better targeted where suitable Rail Freight hubs can easily be constructed to minimise the need for road transport or enable easy road/rail interchange.</p>	<p>Amend text to include a new paragraph in respect of rail freight to include the points outlined in the Officer response. Also amend Policy TA1 to include "where possible general industrial and storage and distribution sites should consider bespoke rail freight terminals where these are feasible and where suitable rail freight hubs can easily be constructed to enable easy road/rail interchange".</p>
	<p>*Support the comments regarding the difficulties of improving rail connectivity in the region.</p>	<p>Support noted.</p>	<p>No Change.</p>
	<p>*Cycling should be added to the list in para 10.4.</p>	<p>Cycling (& walking) in this instance comes under the umbrella of 'more active travel modes' in para 10.3 but could be usefully clarified</p>	<p>Amend supporting text to clarify more active travel</p>

	*Should Somerton/and or Langport stations be added to the list of stations we would like to see reopened.	There is no evidence base or business case to bring this forward. Given the likely costs and the levels of development envisaged in both Langport and Somerton it is extremely unlikely that any new development could fund a reopening of these stations.	No Change.
	*Add provision of on-road cycle lanes and off-road cycle routes (e.g. between Yeovilton/Ilchester and Yeovil) as sustainable transport.	Provision of specific cycle routes will come forward through SCC's Implementation Plans for the Future Transport Plan. The scale of the development will affect the level and nature of cycle routes that can be realistically delivered. Obviously there will be more opportunities in respect of larger developments and this is reflected in the hierarchical approach taken by the Core Strategy.	No Change.
	* Para 10.7 please explain what opportunities there are to improve sustainable links to Yeovil stations (particularly Yeovil Junction) and explain how these can be implemented.	Accept that Yeovil Junction 'is where it is'. However a commercially operated 30 min. frequency bus was recently introduced (Aug 2010), which connects the Junction to the Town Centre, Pen Mill Station and some residential areas. Depending on the location of the urban extension then there is the potential to improve public transport links between the stations and the urban extension, and also the wider area including employment sites. Depending on the location of the urban extension, similar opportunities exist to link existing cycling and walking routes e.g. Sustrans cycle route 26.	No Change.
	*Ilminster has very little public transport and it is expensive.	A matter for Transporting Somerset (Public transport section at SCC) and the operators (as some routes are commercially operated) to address. Neither SSDC nor the Core Strategy has any jurisdiction over this.	No Change.
	*Core Strategy suggests a shift with elderly residents living in the villages and small towns and young people in Yeovil, yet the modal shift does not look at this issue and the fundamental shift required for those residents.	The Core Strategy does not dictate where people live. It is designed to ensure development takes place in the most sustainable locations, where modal shift is easier to achieve.	No Change.
	* Danger that the important messages in this chapter could get lost as the document is neither clear or concise. Repeats itself at various stages and there are confusing disjoints between supporting text and the policies. Would a developer be able to find the information they want with ease?	Accept that this is complex subject and accept that some rewording may be necessary to ease understanding. The supporting text is there to assist in the understanding of Policies. It is inevitable that there will be some repetition when Travel Plans are discussed.	Amend text to provide clarity and to ease understanding.

	<p>* Little or no mention of proposals for transport other than those connected to or will arise from development. Bigger picture ideas such as overarching aims for transport would help to provide a vision and context for the chapter. Appears to be more focus on process than outcomes and the bulk of the document may be better suited within best practice guide.</p>	<p>The 'Bigger Picture' ideas are discussed in respect of Yeovil (the UWE report) and Chard (the Regeneration Framework) where these 'Bigger Picture Ideas' are realistic. The Yeovil Transport Strategy Review 2 has yet to be completed and will form part of the Evidence Base.</p>	<p>No Change.</p>
	<p>* Strategy is reactive (following a development control model) rather than proactive (following a development management model). Tends to only address delivery of travel measures only in the context of new residential/employment development. Includes little regarding proactive measures and investments by SSDC and partners such as SCC or public transport operators to address the existing population and workforce's needs and problems.</p>	<p>Disagree, strategy is proactive rather than reactive. Aim is to deliver as high a degree of modal shift as is reasonably possible in relation to the scale and type of development. Greater modal shift is possible on new developments where it can be designed in from the start. It is also possible for these sustainable transport links to be operated viably (i.e. bus services without ongoing subsidy) and deliver connections to existing facilities, employment sites and residential areas where such sites can deliver reasonable end to end journey times and sufficient numbers of people. This also applies to walking and cycling where convenience, safety and desired journeys can be designed in from the start, and where possible be joined up with other sustainable transport routes e.g. Sustrans cycle route 26. The policies in respect of Yeovil and Chard do look at measures such as Quality Bus Partnerships that include proactive measures with key stakeholders. Similarly, other work being carried out by the LSP is currently considering improved provision for the existing population.</p>	<p>No Change.</p>
	<p>* Para 10.3 - Important to acknowledge (and address) the considerable benefits often conferred by car travel. If modal shift is to be achieved, it is important to be realistic about this.</p>	<p>Noted, covered in para 10.1 .</p>	<p>No Change.</p>

	* Para 10.5 - Re 'new technologies' it is important to note the potential to simply relocate the sources of pollution, unless the generation mix is radically changed.	Accept that the level of emissions from an Electric Vehicle (EV) will depend on how that electric power is generated. Renault's Fluence EV ranges from 12g/km if powered by French electricity, 62g/km based on EU average and 153g/km if all coal. Nissan say that the national grid is currently 60% more efficient at producing energy than internal combustion engines (77g/km 'Well to wheel', i.e. source to use) and the actual motor is also much more efficient than internal combustion engine driven cars. Vauxhall quote a figure of "emitting less than 40g/km of CO2" for their extended range EV, the Ampera.	No Change.
	* Para 10.5 - re 'if the alternative of major highway infrastructure investment is to be avoided' - Whilst it is unlikely that new developments will be able to avoid the need for new highway infrastructure, large scale road building is unlikely to be the alternative to the successful implementation of sustainable travel measures. A more realistic alternative to success in this respect would be continued growth in congestion, environmental degradation, health costs and attendant economic effects. Whilst some road infrastructure is likely to be necessary it will be vital to ensure sustainable travel measures work, as in many ways there are no alternatives.	The transport policies avoid the need for major highway infrastructure because we recognise that neither public funding or developments themselves will be able to fund the level of highway improvements required. Agreed that no action would result in "continued growth in congestion, environmental degradation, health costs and attendant economic effects." Edit text to reinforce this point.	Amend text to reinforce point about continued growth in congestion.
	* Para 10.5 - SCC suggested deletions and additions to text of paragraph (re. Strategic infrastructure & public investment).	Whilst the policies do not rely solely on public investment (see policies YV4, YV5 & CV4), agree with suggestion to include strategic infrastructure where appropriate.	Amend text to include reference to strategic infrastructure where appropriate.
	* Para 10.6 - Is it challenging enough to have a "reasonable aim for the modal shift policy in Chard and Yeovil". It is not clear that maintaining car use at current levels in market towns and villages is a reasonable aim when the previous sentence refers to increasing use of more sustainable modes of various measures. The strategy also needs to be clear about what "current levels" means, in particular whether it refers to absolute numbers or proportions. Note that the target modal shift for eco-town developments needs updating. ref to "model" should read 'modal'.	Given the significant growth envisaged for the District, maintaining car use, at current levels in towns and villages (other than Chard & Yeovil) will be a significant challenge, therefore whilst this is a laudable aim, from a policy perspective it would be difficult to monitor this specific target, hence clarifying its specific meaning is not required. Increasing the use of sustainable modes of travel will assist in achieving this overarching goal. Note error re model should read modal.	Amend text to change 'model' to 'modal'.

	<p>* Para 10.7 - Not aware of any evidence that rail growth is disproportionately composed of longer distance trips - seems unlikely given the stopping services on the Heart of Wessex line. Therefore evidence does not support the assertion that "modal shift to rail for short journeys will be difficult to achieve". Suggest that growth in local traffic is achievable and should be pursued where possible by the strategy. This suggests the absence of any significant further mention of rail travel would also need addressing.</p>	<p>The Bristol to Weymouth line has seen significant growth along the length of its route, with all stations seeing similar levels of increased use. Whilst there is no specific evidence to suggest that some of this growth is or is not attributable to increased local journeys, access to major destinations on the line such as Bath and Bristol together with seasonal travel to Weymouth is assumed likely to have made a somewhat larger contribution. Given the low frequency and unsuitable timings (as stated in the text), achieving more substantial modal shift by rail for short journeys will only be possible if the service level is improved. The scheduling of suitably timed trains arriving at Yeovil Pen Mill to enable commuting to work or education could dramatically increase the take up of local rail journeys. There is also potential for a cross border approach to encouraging improved rail connections through liaison between both Dorset and Somerset County Councils and the Heart of Wessex Rail partnership.</p>	<p>Amend text to include the appropriateness of timings of trains arriving at Yeovil Pen Mill and potential for a cross border approach to improving rail timetabling.</p>
<p>Generic District Wide Modal Shift</p>			
<p>Generic District Wide Modal Shift (para 10.8)</p>	<p>* Important to note that measures noted to achieve modal shift are almost entirely confined to new developments and will only impact on a tiny percentage of 'district wide' vehicle trips.</p>	<p>The measures sought through the draft Core Strategy can only make an impact on development proposals as that is the purpose of the document. There are however, other mechanisms in place at a County and District wide level which also seek to tackle modal shift and together, a variety of approaches will hopefully make a bigger impact on tackling the issue.</p>	<p>No Change.</p>
	<p>* Paragraph 10.8 (a) - Trips substitution methods such as working from home should be listed in this section. This measure can be seen to oversimplify the nature of behavioural change. Packs sound useful but are unlikely to achieve awareness of the need to change behaviour on their own. Doing this would require a wider range of measures and a more sophisticated and flexible approach to the complex motivators of travel behaviour.</p>	<p>Working from home is noted in para 10.8, however agree that a reference to 'working from home' in the Travel Information Packs would be useful. The packs and indeed 'working from home' are part of a wider range of measures to either reduce the need to travel or encourage sustainable travel.</p>	<p>Amend text to include reference to working from home in Travel Information Packs.</p>
	<p>* Paragraph 10.8 (a-c) - Seek clarification as to whether "all new residential and employment developments" means all new residential and employment developments without exceptions.</p>	<p>Yes, applies to all new residential and employment development as stated, there are no exceptions.</p>	<p>No Change.</p>

	<p>* Paragraph 10.8 (b) - Re: 13 amp charging points, some sources indicate that a 16 amp point as preferable. It is important that this is clarified and amended as appropriate.</p>	<p>16 amp charging points have now become the norm. These are not vastly different in terms of cost. Technologies in respect of electric vehicle charging are improving rapidly, however given that many cars spend 95% of the time parked often either overnight at home, or during the day at the workplace then the sort of high spec and expensive rapid chargers that are currently emerging are not necessary in these locations and current costs would be unreasonable. There is a need to balance the cost of provision, with the need to future proof for the development of new technologies.</p>	<p>Amend text and Policy to refer to charging points of 'at least 16amps'.</p>
	<p>* Paragraph 10.8 (c) - "Green Travel Voucher" would benefit from being expanded to include rail travel and cycle purchase. Unclear who the policy on Green Travel Vouchers for employment applies to - is all staff including, temporary, part time and casual staff and what are they entitled to? If modal shift is to be achieved it is important to be realistic. Policy may be unenforceable without this kind of detail. Not clear if the requirement in the first sentence refers to the first 5 yrs of the first 3 tenures or not. Also unclear what is meant by a maximum of three tenures and how it would be decided if one, two or three tenures is appropriate. Assumed that Transporting Somerset have also commented on this proposal.</p>	<p>Agree - it is for 'use on sustainable transport' and this needs clarification to include train travel and cycle purchase. Also accept the need for clarification re. temporary, part-time or casual staff. As for items such as holiday entitlement, part-time staff and temporary staff with a contract of employment should receive such a voucher on a pro-rata basis. Similarly it would not be expected for casual staff. In respect of tenures, text should be amended to clarify - "a green travel voucher should be given to each set of occupants at the time of first occupation and repeated for a maximum of 3 tenures per unit up to 5 years following the first occupation of that unit."</p>	<p>Amend text to clarify the modes of transport, staff and tenures to which Green Travel Vouchers apply.</p>
	<p>*Paragraph 10.8 (d) - Important to understand and address the full range of factors that influence decisions to work from home such as space and type of household. There is some evidence (ref provided) that indicates that home working relocates rather than reduces trips. More leisure and retail trips occur so the only effect is likely to be peak spreading. So although home working is supported these factors need to be taken into consideration.</p>	<p>Whilst in some instances home working could relocate trips, the benefits generally far outweigh any additional substitute leisure journeys that the user may make.</p>	<p>No Change.</p>
<p>Policy TA1 Low Carbon Travel</p>	<p>* Paragraph 10.8 (f) - This section is confusing; it identifies travel-planning documents within the parenthesis but refers otherwise to travel planning measures. The policy covers travel plan documents rather than travel measures.</p>	<p>Travel planning measures are shown in para 10.8 (bullets a. to e.). Para 10.8 (f.) merely recognises that for larger developments further measures in line with the documents set out in the Travel Plan Policy TP2 will be required.</p>	<p>No Change.</p>

	<p>* Paragraph 10.8 (g) - Whilst SCC are in favour of this aspect of the policy it is felt important to note this requires the planning authority to be supportive of the need to ensure that travel plans are written up and approved early on in the planning process. This will require the approval of travel plans upon commencement rather than upon occupation (which limits effectiveness and risks delay on implementation). Important to think about how this could be delivered on smaller developments.</p>	<p>Support noted. Agree that it is important that Travel Plans are approved prior to commencement of a development rather than on occupation, and the implementation procedure agreed in advance.</p>	<p>Amend text to clarify the procedures that apply to the approval and implementation of Travel Plans.</p>
	<p>* Much of the thinking on transport seems to be dated. Next 20 years will move towards energy efficient small vehicles. Reliance on buses using country lanes will end sooner or later. Accept that there is always going to be a need for public transport serving rural areas but would have been good to see some original thinking on how this could be met in the future. This may have led to different conclusions on the type of vehicles that might be needed e.g. in town facilities such as car parks, park and ride arrangements and taxi services.</p>	<p>Recognise that there are likely to be technological developments in respect of low emission cars, hence the inclusion of electric charging points in the policy, however there will always be a need to provide some form of transport for those without access to a car. The need for that provision (e.g. Demand Responsive mini-bus, voluntary car scheme, taxi or conventional bus) will vary according to location.</p>	<p>No Change.</p>
	<p>* Support Policy TA1.</p>	<p>Support noted.</p>	<p>No Change.</p>
	<p>* The intentions of Policies TA1 and TA2 are broadly supported but they go far beyond the remit of what is necessary in a Core Strategy to deliver growth - this level of detail is not appropriate for a Core Strategy. The Core Strategy is too long and could be made more concise by rationalising some of the wording and policies (e.g. TA1, TA2, HW1, HW2). For example, the travel plan requirements could be appended to the Core Strategy or set out as part of and SPD on developer contributions.</p>	<p>Disagree with the statement that the policies go too far. These policies have emerged after consultation and involvement with local communities. Publication Plan will be shorter but it is important to explain the rationale behind policies fully.</p>	<p>No Change.</p>
	<p>* In Policy TA1, the level of prescription requiring 13 amp sockets in garages goes way beyond what is appropriate for a Core Strategy. It is important that the policies do not repeat themselves e.g. the transport led elements of Policy TA1 are already covered in Policy SS7 (which can also be made more concise).</p>	<p>The inclusion of charging points is entirely reasonable (and this has subsequently been included in the draft National Planning Policy Framework). Policy SS7 covers planning obligations "to secure a range ofcommunity infrastructure in line with the appropriate policies in the Core Strategy"</p>	<p>No Change.</p>

	* Need to promote sharing transport as attractive and community minded, on top of advertising its availability through 'Travel Information Packs'. This can be done through communications technology, which can also substitute retail deliveries for car journeys.	This level of detail could form part of the Travel Packs but is not required in the Core Strategy.	No Change.
	* The old S&D railway line could be regenerated as a cycle route and footpath between Shepton Mallet, Evercreech, Castle Cary, Bruton, Wincanton.	This would be for Somerset County Council's Future Transport Plan - Implementation Plan to deliver.	No Change.
	* Need to take into account the fact that it is difficult to use public transport as there are few buses and none in the evening.	Accepted, this is why the Core Strategy advocates a hierarchical approach in its settlement strategy, with development centred on more sustainable locations.	No Change.
	*Much of this section relates to larger scale development, but the Core Strategy addresses smaller scale development also. Need to explain the size at which contributions are triggered. May need to take into account 'roof tax' options if we go down that route.	Covered in Policies SS6 and SS7 which deal with phasing, cumulative impact and planning obligations.	No Change.
	*Travel Packs are welcomed but again it is not clear if applied at a lower threshold. Suggest that Travel Pack for larger development is updated to reflect the services that are beneficial 3 yrs after the development is complete or to tie in with the existence of any developer contributions for transport improvements.	Policy TA1 provides for Travel Information Packs for all new development. Comments re larger developments are noted. Day to day travel is very much based on habit and evidence has shown that these habits are most likely to be broken when significant lifestyle changes occur i.e. moving house/job etc - looking at schemes 3 years later, may not therefore prove very cost effective. A more effective approach would be to link the updating of Travel Information Packs with Personalised Travel Planning (See Policies YV4 Yeovil and CV4 Chard).	No Change.
	*Green Travel vouchers also welcomed, but not clear if entire journey has to be made in Somerset, if so those living on the periphery of the District would be disadvantaged.	Travel cannot be confined within District or County boundaries, para 10.8c confirms that vouchers would apply "... on local bus routes, including demand responsive routes within a 10 mile radius of the site.	No Change.

	*Appears Green Travel Vouchers for residential is for 5 yrs and employment for 1 yr, but commentary suggest that both for 1 yr - please explain.	Noted, the Policy and supporting text should be amended to clarify that for residential development, the provision of a Green Travel Voucher should be given to each set of occupants at the time of first occupation and repeated for a maximum of 3 tenures per unit up to 5 years following the first occupation of that unit. In other words if the property were 'sold' 4 times within a 5 year period, only the first 3 occupants would receive the Green Travel Voucher. Similarly, if the property were occupied for 6 years by the same person and then sold, there would be no requirement for the developer to provide the new occupant with a Green Travel Voucher, as the 5 year period had expired.	Amend Policy and supporting text to clarify the implementation of Green Travel Vouchers.
	* Third bullet point does not match supporting text (10.8 (C)) which for dwellings, talks about the first 5 years of 3 tenures and "at Commencement of employment".	See response above	Amend Policy and supporting text to clarify the implementation of Green Travel Vouchers.
	*Suggest the policy be amended to align the policies (where feasible) in a way which allows developer contributions to be used creatively to complement the existing subsidised public service/DRT network whilst providing direct benefit to the development.	Policy TA1 - last bullet point does this.	No Change.
	*Policy is unduly onerous and contrary to national guidance (Circular 05/2005 and CIL Regulation 122(2)) - charging points for electric vehicles adjacent to every car parking space is excessive and not reasonable.	Planning obligations need to meet certain tests, (see Policies SS6 and SS7). Successive guidance from both the DfT and the DCLG have made clear the importance of including provisions to charge electric vehicles. The cost of providing 13/16amp sockets at build is neither expensive nor excessive and is all that is required. (N.B. The Policy deliberately refrains from requesting the installation of more expensive bespoke charging hardware such as 'pod points' or rapid chargers for this reason).	No Change.
	*Chargeable hybrids and battery only cars are expensive; Methane is a more affordable fuel with carbon footprint benefits - why select just one fuel under this heading.	The policy does not prohibit or discourage the use of other sustainable fuels. A big barrier to plug-in hybrids and electric vehicles is the availability of charging points both at home and at work and these policies endeavour to address this.	No Change.

	* Many people are afraid to cycle in Yeovil because of the busy roads. More cycle routes should be provided and this would help to ease congestion.	There is greater potential to achieve cycle routes where there is new development. Where there is existing infrastructure or even for those sites approved under old policy it is more difficult to achieve.	No Change.
	* Would be helpful if reference were made to promoting the health benefits of walking and cycling in this policy.	Health benefits for both cycling and walking are referred to the text in relation to the information that should be included in Travel Information Packs.	No Change.
	* The South Somerset SCS target is a carbon neutral economy and Policy TA1 has been renamed as Low Carbon Travel. It is important to remember that modal shift is a means to low carbon travel and other objectives rather than an end in itself.	Reference to the South Somerset Sustainable Community Strategy is included in para. 10.2 and emphasises the "year on year reduction in carbon footprint to a carbon neutral economy by 2030". Domestic transport, especially in cars powered by internal combustion engines are a significant contributor to carbon emissions. Travel is more often than not a means to an end.	No Change.
	* Policy welcomed and is commensurate with the draft Countywide Travels Plans SPD. Noted that safeguarding the achievement of travel plan measures is not mentioned the provision of a 'safeguard sum' allows a pragmatic approach to be taken.	Support noted.	No Change.
	* Would suggest that preferential and quality car parking spaces and cycle parking facilities should feature as district wide measures as opposed to in Yeovil and Chard only. These seem relatively easy wins and there will be residential and employment developments elsewhere.	The rural nature of much of the District outside of Yeovil and Chard means that realistically the car will remain the primary mode of transport in these areas and the scope for such measures is therefore considerably reduced. Both car and cycle parking are covered in Policy TA4.	No Change.
Travel Plans			
Policy TA2 Travel Plans	* Support the utilisation of the draft countywide Travels Plans SPD however, it is important that SSDC builds support for adopting SPD into the strategy , if it is to be of real value.	Support noted.	No Change.
	* Para 10.10 - Substitution of the term "comprehensive" in place of "onerous" may be more effective.	Noted.	Consider amending text where appropriate.
	* Para 10.19 - Status of the measures is not clear to the reader - are they required, suggested or best practise etc?	Policy YV5 lays out the requirements in respect of modal shift for the Yeovil Eco Town. Agree cross reference would be helpful.	Amend text to include a reference to Policy YV5.
	* Support Policy TA2, the requirement for travel plans and a travel plan co-ordinator post.	Support noted.	No Change.

	*Important that the viability of development is not undermined through provisions of TA2.	Sustainable transport measures properly implemented can enhance developments and can often improve viability by reducing costs/need for highway infrastructure.	No Change.
	*It is not clear if monitoring and corrective action is effective.	Chapter 13 of the Core Strategy considers implementation & monitoring. It sets out a list of objectives, the policies for implementation and Local, National and Core indicators as appropriate. If through monitoring, policies needs amending, this will be considered.	No Change.
	*Too many shoulds not enough shalls.	There is a degree of flexibility for negotiation through the Development Management process.	No Change.
	* Policy does not include Use Classes B2, C2, D1, D2 and Sui Generis uses. Assumed that they have not been mentioned because fewer issues apply but it is important not to imply that these classes do not require travel plans, therefore it would be helpful to note that they do require travel plans. SCC's SPD (p.16) contains wording that may be useful.	Accept that other uses may require Travel Plans and that the text and Policy should be applied to other uses too.	Amend text and Policy to apply to other land uses.
	* Seek clarification over whether a Full Travel Plan is expected to be submitted, finalised and agreed as part of outline applications. In particular would like to ask whether 'framework' travel plans may be acceptable (in the DfT sense rather than eco-towns terminology).	In accordance with the DfT's 'Good Practice Guidelines - "Delivering Travel Plans through the Planning Process" (April 2009) it is expected that an outline application should be accompanied by a Travel Plan appropriate to the size and type of development. However in accordance with that guidance this may take the form of an interim Travel Plan where it is not possible to identify all the outcomes and/or where the uses and end users are unclear. Framework Travel Plans that set the parameters for individual uses/elements to prepare their own subsidiary Travel Plans would also be expected for large mixed use developments with multiple occupants or mixed uses. Also important that Travel Plans are approved prior to commencement of a development rather than on occupation (See comment/response 10.8g)	Amend text to clarify the procedures that apply to the approval and implementation of Travel Plans.

	* Not clear if this policy contains extensions, particularly for employment premises, which may increase occupancy and travel demand. The minimum thresholds noted are not consistent with other policies.	The extension to employment premises would be treated as new development and subject to the same standards/thresholds. It would be unreasonable to include existing premises into the overall threshold for each site. The minimum thresholds are based on the SCC draft SPD for Travel Plans and then based on English Partnerships employment densities. It would not be reasonable to express thresholds in terms of the number of employees, which could easily change over the lifetime over a property.	Amend text to clarify that requirements apply to extensions on employment sites.
	* Travel Plans alone are not sufficient to ensure use of bus services. Subsidies and the incentives should be explored.	Travel Plans include a range of measures that will be used in conjunction with other transport policies in the Core Strategy to assist in the delivery of sustainable transport options. Incentives to use buses are very much part of the Travel Planning package. Subsidies however are a matter for the transport authority (SCC) if commercial viability of a particular route is not attainable. The aim of Core Strategy policies are to provide, within reason, conditions that are conducive to deliver financially viable bus routes.	No Change.
Transport Impacts of Development			
Transport Impacts of Development (paras 10.20 - 10.26)	* Agree that direct access to the Strategic Rail Network should be avoided.	Noted.	No Change.
	* Para 10.20 - May be hard for readers not already familiar with the process to distinguish where this paragraph refers to travel plans and where it refers to transport assessments.	There is a presumption that the reader will also have considered the previous section on Travel Plans and Policy TA2.	No Change.
	* Para 10.26 - Referring to "transport" as a "transport related contribution" may be confusing for readers.	Noted - the transport related planning obligations are more than just physical contributions such as the provision of routes or cycle storage, Travel Plan measures consider other transport related obligations such as access for emergency services and other essential users, and drainage and flood prevention that relates to the highway.	Amend text to replace word 'Transport' with 'measures to encourage alternative modes' in first bullet point.
	*Object to para 10.23 and fact that development proposals will be expected to provide or contribute towards the cost of providing transport infrastructure - on basis that it should not apply to all development and suggested rewording.	There must be a presumption that all new development is required to address its own transport implications, if both national and local indicators for sustainable transport are to be met.	No Change.

	*Amend policy so that appropriateness of any provision of, or contributions towards infrastructure is based upon the scale and nature of development that is being assessed. Suggested wording "where necessary, development proposals of an appropriate nature, size and scale will be expected...".	The Policy is already based on the scale and nature of the development. The phrase in para 10.23 "where this is necessary to make the development acceptable in planning terms" covers the differentials between sites and additionally the thresholds built into the other transport policies reflect the differing degree of measures needed to mitigate impact.	No Change.
Policy TA3 Transport Impact of New Development	* These are fine aspirations - enforce them.	Support noted.	No Change.
	* Support Policy TA3. Reference Circular 02/2007 DfT Guidance on Transport Assessments and the Good Practice Guide: Delivering Travel Plans through the planning process.	Support noted - Consider inserting footnote to include reference to DfT circular 02/2007 (Transport Assessments). Good Practice guide to Travel Plans relates to previous section.	Insert footnote (para.10.20) to reflect circular 02/2007.
	* Ensure walkers, cyclists and horse riders are safe.	Safety of all users will be paramount - TA3 already includes reference to "securing inclusive, safe and convenient access on foot, cycle and by public transport". Bridleways are referred to in para 10.26.	No Change.
	* Policy wording is unclear - for example "and shall be" should be added to the end of the word "implications".	Accept.	Amend text to insert "and shall be" after implications - Policy TA3.
	* Policy is unnecessarily detailed for the basis of forward planning, for example Bunford Business Park would not have been awarded planning permission under the fourth test of this policy.	This policy looks at the potential impact of new development on the transport network. Bunford Park is an allocation that has been carried forward from the South Somerset Local Plan, its highway implications were considered by the Inspector at the time of the Local plan inquiry.	No Change.
	* Is this wording sufficiently robust to ensure that transport/travel to off-site obligations, such as play provision is secured for the appropriate user groups. Is it sufficient to cover obligations to fund crossing.	There is a finite amount that any development can realistically deliver and remain viable. Policies on Planning Obligations cover this.	No Change.
	* Yeovil, Wincanton and places are freight destinations, the HGV traffic causes particular tensions across unimproved rural networks including the Dorset network. Of particular note are tensions with the alignment of the A37 between the Dorset border and Yeovil, the A30 between Yeovil and Shaftesbury and the A357 north of the Dorset border, all which appear likely to be exacerbated by the Core Strategy proposals.	Noted. Improvements to HGV/freight corridors should be considered through SCC's Future Transport Plan Implementation Plans. Para 10.23 states that "Development proposals will be expected to provide or contribute towards the cost of providing transport infrastructure where this is necessary to make the development acceptable in planning terms through planning obligations where necessary". This would include mitigation of any impact on freight corridors arising from such development. However in the interest of clarity and to reinforce this point reference to freight/HGV corridors will be included in the text.	Amend text to include a reference to freight/HGV corridors.

	* Draft Bournemouth, Poole & Dorset LTP3 (2011-2026) will include a route management approach to specific routes, several that cross into South Somerset. A formal joint working arrangement relating to such projects financed by developer contributions where development exacerbates existing tensions would be a welcome addition to policy.	This is a matter for consideration as part of joint working but the IDP has not identified any specific projects at present time..	No Change.
	* Draft Bournemouth, Poole & Dorset LTP3 (2011-2026) will include community based solutions to sustainable transport (informative documents are attached to rep). Concept is being included in Dorset LDFs would like to encourage SSDC to embrace the idea.	The concept of community-based solutions to sustainable transport mooted by Dorset County Council is innovative and potentially offers solutions to similar areas in South Somerset. There are also strong links with some of the current work emerging from the South Somerset Local Strategic Partnership, however this will need to be the subject of further discussions with SCC as the transport authority rather than in the Core Strategy	No Change.
	* Draft Bournemouth, Poole & Dorset LTP3 (2011-2026) include improvements to heavy rail connectivity in the Heart of Wessex and South West Main Lines and a cross border approach to encouraging these improvements could be further reinforced in the SSDC Core Strategy.	Agree, there is potential for a cross border approach to encouraging improved rail connections.	Amend text re. timing of rail journeys.
	* Concentrates only on hard infrastructure/facilities and fails to mention important 'soft' mitigation measures.	The 'soft' measures are all referred to in respective policies and in paragraph 10.26 of this section. Accept that reference to their potential to mitigate the need for infrastructure may be beneficial.	Amend text where appropriate.
	* Might be helpful to include a definition of what 'larger' is in relation to the requirement for Transport Assessments.	The DfT's 'Guidance on Transport Assessment circular 02/2007 sets out (in appendix B) suggested thresholds for formal Transport Assessments. However it also states (2.13) that this guidance should not be read as absolute and a range of qualitative as well as site specific issues need to be taken into account. Transport Assessments at lower levels than the guidance states may or may not be requested by the Highways Authority and Highways Agency. It is advisable therefore that Core Strategy adopts a flexible approach to recognise this.	Insert footnote (para. 10.20) to refer to DfT circular 02/2007.
Parking Standards			
Policy TA4 Parking Standards (and paras 10.27 - 10.32)	* Support the flexible approach to car parking standards proposed by TA4.	Support noted.	No Change.

	* All new developments must provide space for their own parking requirements.	Parking standards will be based upon the emerging Countywide Parking Strategy, and levels will vary depending on site accessibility, type of development, local car ownership etc.	No Change.
	* Off street parking is necessary when redundant buildings are developed.	This would not be possible in refurbishments which are outside planning's remit, but the necessary standards would apply if redevelopment took place that required planning permission.	No Change.
	*There is a car parking deficiency in Ilminster, rising to 120 deficient spaces by 2016. The Town Council seek adequate car parking provision/spaces in all new developments in the Town.	The District Wide Car Parking Strategy (2007), although due a review, does identify a deficit of 40 spaces in Ilminster by 2016. Appropriate standards for new development will be set out in the emerging Somerset Countywide Parking Strategy.	No Change.
	*Must deal with insufficient car parking - people will not give up their cars. Ilchester needs more car parking spaces. If there will be an additional 150 homes, need more car parking spaces.	There is a lack of evidence as to car parking supply in Ilchester as it was not considered in the District Wide Car Parking Strategy (2007). Appropriate standards for new development are set out in the emerging Somerset Countywide Parking Strategy.	No Change.
	* New housing developments namely flats in Yeovil must include adequate parking off road. In Europe most flats have basement parking (2 space per flat). We should adopt this approach here. Need to accept that every household will have at least 1 car.	A Report examining (the then) Local Plan Policy TP7, indicates that residents in town centre residential developments, tend to own a car despite reduced off street parking provision. 'Optimum' standards for new development are set out in the emerging Somerset Countywide Parking Strategy.	No Change.
	* Parking standards have been a major concern - hope that when parking standards are reviewed the current-problems with on -street parking in Yeovil will be addressed.	A Report examining (the then) Local Plan Policy TP7, indicates that residents in town centre residential developments, tend to own a car despite reduced off street parking provision. 'Optimum' standards for new development are set out in the emerging Somerset Countywide Parking Strategy.	No Change.
	* If policy includes extensions, particularly to employment premises this might increase occupancy and travel demand. The minimum thresholds are not consistent with policies.	The emerging Somerset Countywide Parking Strategy sets thresholds to which parking standards will apply, so extensions would be included if they met these thresholds.	No Change.
	* Need to be realistic about parking requirements for real people in real life as in the Strategic Health Authority building on Lufton Way, Houndstone.	Noted. The emerging Somerset Countywide Parking Strategy will seek to do this.	No Change.

	* Para 10.27-10.29 - Within the asserted need to provide for changes in parking demand it is possible to modify demand for car travel. By being creative with parking provision in terms of design, locations, pricing etc a good deal can be achieved.	A Report examining (the then) Local Plan Policy TP7, indicates that residents in town centre residential developments, tend to own a car despite reduced off street parking provision. 'Optimum' standards for new development are set out in the emerging Somerset Countywide Parking Strategy. Agree with the need to be more creative e.g. through applying Manual for Streets guidelines.	No Change.
	* Para 10.30 - Cycling - include further standards from the countywide Travels Plans SPD and /or the emerging Cycling Strategy. Might be useful to refer to current standards to fill any gap cause by delay in adopting the Countywide Parking Strategy which will cover cycling in more detail.	It is envisaged that the current timetable allows the Countywide Parking Strategy to be incorporated in the Core Strategy.	No Change.
	* Para 10.30 - Assertion that cycle parking is the most significant barrier to increasing cycling does not fit well with SCC's developing cycle strategy. Many factors such as perceptions of and attitudes to the mode and the characteristics of the trips made present equally, if not more, significant barriers. Rather than using the 2006 cycle strategy it would be more helpful to state that parking should be provided in accordance with the standards set out on the Travel Plans SPD and the levels to be set in the new parking standards currently being developed.	Both the most up to date published Cycling Strategy (2006) and the Travel Plans SPD has been used to inform the Core Strategy.	Amend text to add reference to other suggested factors that represent barriers to cycling.
	* As the Countywide Parking Strategy will not contain such detail on this issue, it would be sensible to note the need for high quality, secure and convenient cycle parking also.	This is already detailed in para 10.30 of the draft Core Strategy.	No Change.
	* Reference to suitable motorcycle parking should be noted alongside consideration of other modes of transport reference should be made to the standard in the Countywide Parking Strategy.	Do not consider there is a need to refer to motorcycling specifically as these standards are included in the Countywide Parking Strategy.	No Change.
Health and Well Being			
Health and Well Being (paras 11.1 - 11.8)	*Environment Agency - recreational facilities may be considered acceptable in flood risk areas, but the suitability and appropriate use should be considered. SuDS may also be appropriate for informal recreation depending on the design.	noted. Agree with the concept of 'shared use'. This is something that could be promoted more fully through the Green Infrastructure Strategy	Amend text where relevant
	*Include examples of actual recreational use of space so that design can anticipate functional requirements.	This level of information should be addressed through the Open Space Strategy and the PPG17 Assessment.	No Change.

	*A ring road bridle path should be considered for Yeovil to support walking, cycling, running and possibly horse riding - a circular connection would be a distinctive feature of the town, facilitating access to countryside and support regular exercise.	This is too prescriptive to be achieved through a strategic policy document. Possibly could be considered as part of the Green Infrastructure Strategy (GI Strategy)	No Change.
	*NHS Somerset support Policy HW1 but there is no mention of health infrastructure - planning system needs to ensure that provision is made for additional medical facilities and that sites are affordable.	Noted. Additional health requirements are identified as part of the IDP in appropriate locations.	No Change.
	* Paragraph 11.1 - states that cultural and community facilities make a major contribution in towns and villages but there are no policies that acknowledge this contribution and protects existing cultural and community facilities to their loss.	The supporting text acknowledges the need to provide cultural and community facilities in the right place, with the objective of these policies to provide facilities through development. Policy EP16 provides the framework for the retention of services and facilities, including community facilities. However it is acknowledged that this does not specifically mention cultural facilities.	Amend Policy EP16 to include 'cultural facilities'.
	Strongly suggest that the terminology used is reviewed in order to produce a document that is clearer for users of the plan. Definitions of all terminology should be in the Glossary.	The terminology used was consistent with the supporting documents; the Open Space Strategy and PPG17 Assessment. Unfortunately at the time of the consultation these documents were not publically available so full clarification of the context of the terms was not available.	Ensure that all supporting evidence is published and changes to the policy are fully consistent. Simplify the wording of the policy ensuring all aspects of facilities covered by the policies are clearly identified. Amend text accordingly.
	Paragraph 11.1 - Accessible green space should be added to the list.	Open space within the policy text is defined as 'informal recreational open space, formal parks and gardens, country parks, natural open space and woodland'.	No Change.
	* Should mention the importance of accessible natural green space - Natural England have collated a range of emerging evidence on its positive effects, including; help reduce health inequalities, increase physical activity and reduce obesity, improve mental health and well being, contribute to functioning ecosystems. See NE evidence sheet.	Paragraph 11.5 defines 'Open Space' including natural greenspace and that it is 'clearly beneficial to the health and well being of a local community'. It is proposed that these policies play a key role in enhancing the health and sense of well being of the community. It is intended that the work of the Open Space Strategy and the PPG17 Assessment is built upon through the Green Infrastructure Strategy.	No Change.

Provision of Open Space, Outdoor Playing Space and Sports, Cultural and Community Facilities in New Development	No Comments Received.	N/A	N/A
Local Standards and Planning Obligations	*Sport England urge that key findings of the PPG17 Assessment be included in final Core Strategy and in the Evidence Base to justify the standards being suggested.	Noted.	Ensure publication of supporting evidence.
Local Standards and Planning Obligations (paras 11.9 - 11.16)	*We need more cricket grounds, open air swimming pool and transport to these.	Provision of specific facilities is addressed through the development management process and the assessed needs that will be required in conjunction with the development.	No Change.
	* Whole Health and Well Being section seems wordy and confused, mixing together 3 different elements of infrastructure provision 1. Open space/sport/recreation, 2. Community/village halls, 3. Cultural provision.	The policy concept does include a wide variety of infrastructure, this is because in the absence of the supporting evidence base, it is necessary to include all of these aspects.	Revisit the wording and amend to make it clearer.
	* Paragraph 11.12 Alludes to PPG17 assessment but this is not published - so unclear how the standards for open space etc and community/villages Hall have been arrived at.	Noted.	Ensure publication of supporting evidence.
	* PPG17 does not give guidance on 'cultural and community facilities' which means libraries, museums, theatres and cinemas. The difference between 'cultural activities' and cultural facilities has not been addressed in the Core Strategy.	The aims and objectives of these policies are to ensure that where new development takes place, the opportunity to provide necessary community facilities is there. Libraries and museums are a County Council provision and outside the parameters of this policy document. South Somerset already runs a successful Theatre and provision of cinemas is market led. Whilst the policies aim to promote and enable this kind of development, it is not possible to influence their subsequent use and cultural activities.	No Change.

Exemptions	* Strongly urge the Council to exempt affordable housing from these types of contributions.	Affordable housing and their subsequent occupiers still require and make use of these type of facilities. In line with PPG17, planning obligations should be used as a means to remedy local deficiencies or where new development increases local need. It is therefore not considered appropriate to exclude one type of housing. Upon adoption of CIL affordable housing will become exempt from CIL contributions for off site open space provision in association with development but on site responsibility will remain as Section 106.	No Change.
Exemptions (para 11.17)	No comments received.	N/A	N/A
On or Off Site Provision and Contributions			
On or Off Site Provision and Contributions (paras 11.18 - 11.24)	No comments received.	N/A	N/A
Commuted Sums for Future Maintenance			
Policy HW1 Provision of open space and outdoor playing space in new development (and paras 11.25 - 11.28)	*Accept principle if it does not exceed national standards. Accept section that excludes sheltered housing, rest and nursing homes from most of the policy. Object to sheltered housing, rest and nursing homes not being exempt from informal recreational open space in accordance with Section HW1.2 of the table.	It is recognised that not all types of development will require the same level of provisions. However informal recreational open space is available to occupants of sheltered housing, rest and nursing homes, therefore it is considered reasonable to ask for contributions.	No Change.
	*Is there an error? Should sheltered housing, rest and nursing homes provide children and young people's provision (HW1.2)? If yes, object.	This is an error in the publication and should read HW1.3	Amend Policy to read HW1.3.
	*Welcome inclusion of community facilities although some distinction between buildings owned by one group and those genuinely available to the wider community.	Details relating to the distinction between types of facilities should be identified in the PPG17 Assessment. Privately owned facilities not available to the wider public would not be considered as part of the assessment.	No Change.
	*Could cycle ways contribute to green corridors?	Cycleways do contribute directly to Green Corridors.	To be taken further within the Green Infrastructure Strategy.
	*Does a lack of standards for (green corridors) make securing contributions to this weaker?	There are no national or local standards as this form of development can only be assessed with regard to the requirements of a specific development.	The production of the Green Infrastructure Strategy will form a framework to guide the nature and requirements of Green Corridors.

	*Community plans should be able to influence this area.	This may or may not be applicable depending on the areas requirements and the individual community plan.	No Change.
	*The levels of provision sought within the policy are unrealistic and contrary to Circular 05/2005 and CIL Regulation 122(2) - example 1,000 residents = 417 dwellings, @ 40dph = 10.5ha of which 4ha for open space alone, without other infrastructure = 38% for open space. Typically most developments are master planned on basis of 60% net to gross ratio, Policy HW1 would reduce the gross to net ration further.	It is acknowledged that the standards are aspirational and relate to a large diversity of facilities. Within the context of a development, requirements would be identified on the basis of existing provision and requirements. Contributions for each specific development are currently negotiated through a legal agreement, which would need to have consideration for the viability of the scheme. It would be unreasonable and unachievable to expect a development to provide everything. However standards should be set for the range of facilities to ensure the delivery of a suitable standard of any of the given facilities that there is an identified need. A CIL based approach when brought forward, will cover such strategic off site provision. The current Planning Obligations protocol will still be relevant to apply for on site obligations where viability impact is questioned.	The standards are informed by the evidence base provided within the Open Space Strategy and the PPG17 Assessment. These will be reviewed and subject to change during the life of the Core Strategy, it is therefore proposed to remove the standards from the policies, to allow these standards to be reviewed as necessary.
	*Suggested rewording relating to off-site provision towards local facilities and adequate accessibility	Noted.	To be taken into consideration in the re-drafting of the policy.
	*Support principle, but want stronger support for the role of the accessible woodland. Key linking environment with health and other social and economic issues. Woodland Trust's Woodland Access Standard (WASt) also important policy tool complimenting other access standards used in delivering green infrastructure. Set out position regarding Woodland Access Standard for South Somerset which shows it has a significantly below average resource of accessible woodland. We would also like this to be expanded into a SPD.	Noted. More appropriate expand in context of Green Infrastructure Strategy.	Details relating to woodland provision is to be considered further within the context of Policy EQ5. It will also be an integral part of the provision within the Green Infrastructure Strategy, which it is envisaged will be adopted as an Supplementary Planning Document.

	* Refers to quantitative standards for various forms of provision but due to lack of published evidence not clear how they have been derived. Circular 05/2005 requires that the process of setting planning obligations policies is conducted as openly, reasonably and fairly as possible. The absence of an IDP and PPG17 assessment means that the policies cannot be properly reviewed. SSDC are seeking to promote a new range of tariffs to development without first publishing and consulting on the methodology and charging schedule. They should be found sound and robust at examination.	Noted. The Council is preparing a Community Infrastructure Levy which would follow separate consultation and examination.	Ensure publication of supporting evidence.
	* Support principle of policy but wish to see it more closely aligned with the need to reduce informal recreational pressure on the Somerset Levels & Moors.	The impact of potential development on the Somerset Levels and Moors has been considered in detail through the Habitats Regulations Assessment.	No change.
	* Noise from the expected and unexpected uses of outdoor play areas is known to give rise to disturbance in some cases where residential development is located close by. An additional paragraph should be added to highlight the need to consider the risk of noise disturbance arising from outdoor play space.	Planning and Noise is currently covered by PPG24, a review may be necessary with regard to the forthcoming NPPF.	No change.
	* It would seem reasonable to note support for the need for open space etc to be easily accessible by cycling and walking.	Noted.	No Change.
	* Ensure that garden friendly trees (e.g. fruit trees) are planted in all new build gardens.	This level of detail is very prescriptive and goes beyond what can be achieved in a spatial policy. Possibly be able to give some consideration in the Green Infrastructure Strategy.	No Change.
	* Welcome acknowledgement that in some circumstances provision of open space off-site may be the best outcome.	Noted.	No Change.
	* Policy HW1 is an extremely long policy that is in part replicated in Policy HW2 - as the policies move forward to publication, it is important that the policies are reviewed to ensure they are concise and provide sufficient clarity.	Noted.	To be taken into consideration in the re-drafting of the policy.
	* Support aspiration to deliver quality public open space in new development, and the extended typology in HW1 over that in the current local plan.	Noted.	No Change.

	* Encouraged by the inclusion of parks and public gardens within the open space typology, but puzzled by the woodland figure - which is low, and would not have delivered the Brimsmore Community Woodland for example. Would not want this to compromise quantities of structural landscape planting, which whilst adding value to open space, is a separate planning element to public open space in terms of identification and quantification - recommend this typology is revised and its application clarified.	The woodland figure has been removed from the Open Space Strategy.	Amend the policy to delete the woodland figure.
	* Huge health benefits from walking, riding and biking - footpaths and bridleways are also a vital aspect for tourists.	Noted	No Change.
	* Should mention the provision of natural 'wild' areas for children's play - Natural England have collated evidence which shows that playing in a natural environment improves children's social, mental and physical development.	Paragraph 11.5 defines Open Space including natural open spaces and the benefit to health and well being of communities.	No Change.
Policy HW2 Provision of Sports, Cultural and Community Facilities in new development	*Must seek provision for another indoor sports centre that is available in the daytime. Much of South Somerset's facilities are in schools, but not accessible during the day, need something like Blackbrook Centre, Taunton Deane. There is a need to cater for activity sports such as badminton, squash, table tennis and tennis especially when the Council's policy is to encourage fitness.	See Sports Zone - duplicate comment.	No Change.
	*Policy should clarify that early provision will be required if the development is unable to rely on any excess of capacity in the local neighbourhood.	This level of detail would be considered within the context of a legal agreement during the Development Management Process.	No Change.
	*There are far too many get out clauses here, meaning that a new facility might be needed by a new local community, but that it is not actually provided.	The aim of the policy is to ensure that any identified need is provided for in the most suitable way, either by the provision of a new facility or the enhancement of an existing one.	Amend wording to clarify policy objectives.
	*Are figures on changing room provision correct? My community would rather have a shop or community hall rather than a changing room.	The area for changing rooms has been reassessed and amended in the PPG17 assessment.	The PPG17 assessment provides the standards to be applied in line with this policy.
	*There needs to be a threshold against which new housing developments should expect certain facilities - the thresholds suggested at the last stage of consultation have not made their way into the Core Strategy	Adoption of a Community Infrastructure Levy or tariff approach means that facilities to which Policy HW2 relates would be applied on all housing development via CIL calculation and therefore it is not applicable to have a threshold.	No Change.

	*Eco Town could support 3-4 places of worship.	The provision of community facilities will be assessed on the basis of access to existing facilities, their ability to be upgraded to accommodate the additional population or the need for new facilities.	No Change.
	*Indoor Tennis Courts - the figure refers to the Yeovil Infrastructure Impact Assessment - useful to know where these figures came from.	The standards used within the Yeovil Infrastructure Impact Assessment have been taken from the PPG17 Assessment work as detailed in the policy. It is acknowledged that at the time of the consultation this had not been published.	Ensure publication of supporting evidence.
	*New communities need "spare land" - land that isn't allocated for anything, but that can be used by the local community for a use when it is needed.	In assessing community needs within the context of a development proposal, consideration would be given to existing facilities and any shortfall. These aspects would then need to be incorporated into the scheme. It is unlikely that a developer would provide additional land for later use.	No Change.
	*Why do one bedroomed dwellings contribute towards sport and recreation facilities but not to cultural and community facilities.	One bedroom dwellings must potentially contribute to all aspects, unlike in HW1 where they had exceptions on the expectation the occupants of such properties would be using the facilities to which HW1 applies.	Amend wording to clarify policy objectives.
	*Sport England urge that key finds of the PPG17 Assessment be included in final Core Strategy and in the Evidence Base to justify the standards being suggested - without this standards may not stand up to scrutiny.	Noted.	Ensure publication of supporting evidence.
	*Strategic contributions are complicated in rural areas - strongly support the policy to ensure that any contribution is secured for a facility that serves the new development.	Noted.	No Change.
	* Refers to quantitative standards for various forms of provision but due to lack of published evidence not clear how they have been derived. Circular 05/2005 requires that the process of setting planning obligations policies is conducted as openly, reasonably and fairly as possible. The absence of an IDP and PPG17 assessment means that the policies cannot be properly reviewed. SSDC are seeking to promote a new range of tariffs to development without first publishing and consulting on the methodology and charging schedule. They should be found sound and robust at examination.	Noted.	Ensure publication of supporting evidence.

	* Policy only deals with cultural facilities for new development and even has a table with provision for theatres and arts centres (unlikely candidates for new housing developments) but there are no policies for the provision of new cultural facilities in town centres e.g. libraries, museums, cinemas, theatres etc.	Noted - This relates to town centre facilities which are covered within Policy EP16 Protection and Provision of Local Shops, Community Facilities and Service.	For clarity add cultural facilities to the list.
	* Re Lyde Road key Site - concerned at the lack of space allocated for community use of buildings on the site. A sense of belonging is key to community cohesion and a community association is where truly local decision making can happen. Appreciated meeting Cllr Pallister and was encouraged by the desire to secure additional land for community use. Hope we can learn from the mistakes made in the past.	Noted.	No Change.
Sports Zone			
Policy HW3 Sports Zone (and paras 11.29 - 11.42)	*Must seek provision for another indoor sports centre that is available in the daytime. Much of South Somerset's facilities are in schools, but not accessible during the day, need something like Blackbrook Centre, Taunton Deane. There is a need to cater for activity sports such as badminton, squash, table tennis and tennis especially when the Council's policy is to encourage fitness.	Noted.	No Change.
	*Sport England support the principle of providing a state of the art sports facility but further detailed justification for the scale and mix of proposed facilities is needed. Evidence Base should include such an analysis in order to ensure that such a provision will meet identified needs and be sustainable in the long term. Also preferred site should be identified, so issues relating to the site can be fully assessed through the LDF process.	Lack of published information which has informed the sport and leisure policies, needs to be addressed as soon as possible. There have been problems gaining consensus for a suitable site for Sport Zone. The final report on the Site Options Re-appraisal for Yeovil Sport Zone was produced in December 2010, but no decision on a preferred site has been taken.	Ensure publication of supporting evidence.
	*Need to reassess the Sports Zone to ensure it provides the best District-wide facility bearing in mind travel requirements of users and financial restraints.	Noted.	No Change.

	*Does Regional Cultural Infrastructure Strategy still exist?	In terms of the Cultural Infrastructure Development Strategy, this was produced in 2008 by Culture South West, who were disbanded in 2009. There is now a body called the South West Local Authorities Cultural Partnership, which have a regional remit for culture. The South West Observatory who have a cultural section have advised that some of the organisations who wrote the original strategy have disbanded but those that remain agree that the principles of the strategy still exist, but the detail is out of date.	No Change.
	*Why is the Sports Zone not a Strategic Allocation?	The final report on the Site Options Re-appraisal for Yeovil Sport Zone was produced in December 2010, but no decision on a preferred site has been taken.	No Change.
	*Space for Sports Zone on Brimsmore Key Site instead of the football, cricket and tennis pitches, which could prove difficult to run, especially given that local cricket clubs have folded (Johnson Park could accommodate cricket).	The final report on the Site Options Re-appraisal for Yeovil Sport Zone was produced in December 2010, but no decision on a preferred site has been taken.	No Change.
	Question badminton court forecast - Abbey Manor was built for badminton, which made it hard to heat and impractical for other activities - since been revamped in absence of need for badminton.	Lack of published information which has informed the sport and leisure policies, needs to be addressed as soon as possible.	Ensure publication of supporting evidence.
	* Sports Zone should be built next to the strategic highway. SSDC should be robust in calling into question the Highway Agency reasoning for not allowing building near A303.	The Highway Agency is an Executive Agency of the Department for Transport and is responsible for operating, maintaining and improving the strategic road network in England on behalf of the Secretary of State. They are a statutory consultee for any planning application which could impact on their road network. As such they would look at such items as the potential increase in traffic using a specific junction and the capacity of that junction to accommodate it. Should a development increase potential movements beyond the capacity then the Highway Agency have the right to request improvements, which could make the project completely cost prohibitive.	No Change.
	* 'and other sustainable transport modes' should be added to the end of the second bullet point.	Noted.	Amend text to include the suggested change.
	* Wherever the location, it is inappropriate to provide this facility in this time of financial constraints. In determining the location it has to be decided whether this is to be a district facility or a Yeovil facility.	It is acknowledged that financial constraints could present problems bringing the project forward in the immediate future, however as the time period for the plan is until 2028, it is not unreasonable to include this within our strategic objectives.	No Change.

Existing Outdoor Sports, Play and Youth Provision			
Policy HW4 Protection of Play Spaces and Youth Provision (and paras 11.43-11.45)	*Area East strongly support.	Noted.	No Change.
	*The policy wording is potentially difficult - effectively "playgrounds can only be lost if they can be saved".	The first bullet point of policy HW4 attempts to reflect that it may be acceptable to lose part of an equipped play area, providing the rest can be retained and improved.	Amend wording to clarify policy objectives.
	*The wording needs tightening to ensure that any alternative is available and accessible to meet the needs arising from the subject development.	Noted.	Amend wording to clarify policy objectives.
	*Para 11.43 refers to the supporting text of policy EH10- "no development areas". The No Development Areas are not included on Core Strategy Diagrams and replacement of EH10 is not proposed, therefore how will you protect land. It should be through a DPD, so EH10 should be saved until the DPD is produced. S106 agreements may offer sufficient protection or if it is strategically important a policy should be produced.	No Development Areas will be carried forward as Saved Local Plan Policy	No Change.
Environmental Quality	* The Core Strategy contains no statements or policy for the identification and protection of Tranquil Areas. It is likely this will form part of future implementation of the European Noise Directive and Noise Action Plans.	Noise pollution is dealt with effectively by national policy. Other aspects of tranquil areas can be considered in the context of open space within the GI Strategy.	Add further detail on pollution control in relation to South Somerset in the supporting text. (Green Infrastructure strategy to address tranquil areas issues).
	* Disappointing to see the Environmental Quality chapter is last given the natural environment's cross cutting benefits.	Point noted, but the chapter order does not infer a preference for the topics.	No Change.
	* There is no mention in the environmental quality policies for encouraging the production of local produce and minimising food miles to mitigate climate change, minimise pollution and therefore maintain high water quality, protection of areas of intrinsic darkness, protect best and most versatile agricultural land.	The planning system has little influence on local produce and minimising food miles. Agree that there is currently a lack of detail on pollution control, although this is set out in national policy. Protection of Best and Most Versatile land is set out in national policy.	Add further detail on pollution control in relation to South Somerset, including water and light pollution, in the supporting text.
	* Aspects related to water quality and surface water drainage/flood risk are not sufficiently developed.	Accept that detail is lacking on water quality, but flood risk and surface water flooding are covered.	Add further detail on water quality in South Somerset in supporting text.

	* The chapter only considers air quality and not water quality - numerous private supplies in the District rely on the maintenance of good quality groundwater, which provides important base flow to streams and rivers within the District, and majority of water bodies are currently classed as moderate or poor. Improvement to water quality over time of the Core Strategy is an essential objective of the Water Framework Directive - require a new Policy dealing with water environment. Refer to River Basin Management Plan.	No policy was included because there is sufficient coverage in PPS23, although this will be re-considered in light of the emerging National Planning Policy Framework. Agree that detail on the potential impact of new development on water quality in South Somerset is lacking.	Add further detail on water quality in South Somerset to explanatory text. Refer to River Basin Management Plan in supporting text.
	* Blackdown Hills AONB - understood that Core Strategy should not repeat National Planning Policy, but that it should show how national policy is interpreted and implemented at the local level - with this in mind many of the sections are too general, or indeed very technical and do not highlight the unique qualities of South Somerset and the AONB.	Noted. It would be useful to include further reference to AONB's in the District.	Amend supporting text where relevant to highlight qualities of AONB in the District.
	* A landscape policy should be included, setting out its objectives to favour the active conservation, management and enhancement of both designated and registered landscapes, whilst exercising strict control over development within and adjacent such assets. Guidelines for appropriate development should be devised, relative to local conditions, with an emphasis upon design proposals that are sympathetic to the contextual environment.	Landscape is considered within the general development policy and conservation is included within biodiversity. National policy is comprehensive.	No Change.
	* Should acknowledge the diversity of the South Somerset landscape, as setting for both settlement and community, and its contribution to local distinctiveness and sense of place. The benefit of characterisation as a tool for establishing scale and location of future development, allied to specific design criteria for quality place-making, should also be stated. There should also be specific reference to the peripheral landscape studies.	The diversity of the landscape is recognised within the Core Strategy. Further ability to use, emphasise and enhance this should be included within the Green Infrastructure Strategy	No Change.
	* There is a lack of reference to the historic environment - there is a policy and explanatory text for biodiversity, and should do the same for landscape and the historic environment.	In the drafting of this policy we were conscious of the need not to duplicate the guidance and policy within PPS5. Following the publication of the Draft NPPF for consultation and with regard to approaching change in National Policy and in line with consultation responses, this may need to be considered further.	No Change.

Addressing Climate Change in South Somerset	* All new build and extension development should include sufficient space to store waste and recyclable materials.	Agreed. The Code for Sustainable Homes awards points for the inclusion of space to store recycling, which is likely to be required to achieve the proposed Code levels at urban extensions set out in Policy EQ1.	No Change.
	* Make provision for solar energy capture and utilisation in new buildings and extensions.	Decentralised and renewable or low carbon energy is encouraged in Policy EQ1.	No Change.
Greenhouse Gases			
Greenhouse Gases (paras 12.1 - 12.7)	* Huge improvements are required in transport systems, energy supply and population growth in order to tackle climate change.	Noted - the huge challenge is recognised by national Government, and climate change mitigation measures are required to meet the statutory requirement of an 80% reduction in greenhouse gas emissions by 2050.	No Change.
	* This should be removed as it repeats national legislation.	Disagree - paras 12.1-7 set necessary general background to climate change, and include South Somerset context.	No Change.
	* Para 12.2 states published source data for comparison - the more meaningful comparison for spatial planning purposes is the absolute per capita CO2 equivalent emission, not the proportion.	The number of tonnes can be added for each source of CO2 emissions.	Add the number of tonnes for each source of CO2 emissions.
	* 12.2 fails to identify the level of emissions associated with the development industry - but must consider future carbon emissions.	The data cited did not contain specific figures for the CO2 emissions of the development industry.	No Change.
	* Para 12.7 - the benefit to tourism is a speculative and unsubstantiated assertion.	Potential tourism benefits are only stated as something which may occur, and not an "assertion".	No Change.
Decentralised Energy and Sustainable Buildings			
Decentralised Energy and Sustainable Buildings (paras 12.8 - 12.16)	* Need more local energy production (domestic and community scale).	Agree - Policy EQ1 encourages the development of renewable and low carbon energy generally, but may be useful to explain potential for local energy generation further in supporting text.	Add more explanation in supporting text of the potential for local energy generation (e.g. mention Feed in Tariff).
	* Could make reference to Site Waste Management Plan Regulations 2008, which encourage resource efficiency and waste minimisation.	Noted.	Amend to briefly refer to Site Waste Management Plan Regulations.
	* The Blackdown Hills AONB has recently published a study setting out which forms of renewable energy are most appropriate in the AONB.	Noted.	Amend text to refer to Blackdown Hills AONB study.
	* This does not differentiate South Somerset, so why is it reproduced at such length?	Agree that this section is long, but it was felt that it was necessary to fully explain given the complex subject matter.	Amend text to make section more concise.

Flood Risk	* Environment Agency would like the council to look at a strategic approach to deal with increased surface water.	The main responsibility for assessing risk from local sources of flooding, including surface water, lies with Somerset County Council.	No Change.
Flood Risk (paras 12.17 - 12.19)	* Amend 12.19 as SuDS can reduce the volume of surface water but do not slow down volume or rate of run off.	The PPS25 Practice Guide states "SUDS reduce the amount and rate of water flow" (para 5.11).	Amend text to reflect PPS25 Practice Guide.
	* Support as it mentions the SFRA, the Catchment Flood Management Plan highlights areas at risk of flooding from all sources, the requirement for SuDS and the need for sequential and exception test.	Support noted.	No Change.
Biodiversity and Climate Change			
Policy EQ1 Addressing Climate Change in South Somerset (and paras 12.20 - 12.21)	* Para 12.21 - is there a heading missing from the beginning of the paragraph?	Agree that it would be useful to add a heading here.	Insert heading.
	* Policy appears contrary to National Planning Policy.	Disagree - policy EQ1 is consistent with national policy.	No Change.
	* Wording is too vague e.g. "should" rather than "must"- needs to be greater certainty/impetus that urgent action is required to tackle climate change.	The wording in Policy EQ1 is consistent with national policy.	No Change.
	* Suggest rewording of first bullet point - "New development will ensure that CO2(eq) emissions are minimised".	Agree.	Amend text to include the suggested change.
	* Suggested rewording to first bullet point, 2. point - "on-site renewable energy capture and district-heat technologies". This allows local diesel generators providing piped heat.	The wording in Policy EQ1 is consistent with national policy.	No Change.
	* Support the principle of seeking to deliver low carbon development. Can reduce carbon emissions by at least 10% compared with Building Regs without the need for use of decentralised or renewable energy technologies. Therefore amend to recognise that the level of carbon dioxide reduction proposed can be achieved solely by energy efficiency measures, subject to a high overall development quality approach.	Agree that 10% reduction can be achieved through energy efficiency measures, and the ensuing potential inflexibility and lack of consistency with the need to prioritise energy efficiency measures. However, national and district council policy seeks to encourage renewable energy development and this is a local aspiration.	Make the 10% decentralised and renewable or low carbon energy requirement an addition to CO2 reductions required in Building Regulations.

	* Bullet 3 - unaware of developments in Market Towns being referred to as 'urban extensions'; and why does the requirement not apply to the Yeovil Urban Village?	Directions of growth have been identified for all Market Towns, which would be extensions of their urban areas given the lack of land available within existing settlement boundaries. Yeovil urban village is considered in Policy YV3, which states that Eco town standards will be adopted subject to viability assessment - Eco Town PPS requires at least Code level 4.	No Change.
	* Does bullet 3 repeat Building Regulations?	No, Building Regulations amendments refer to CO2 emissions, whilst the Code for Sustainable Homes and BREEAM concern the sustainability performance of a building more generally.	No Change.
	* Standards should apply from date construction begins not when planning permission is awarded - so can be most up to date standard.	It is not possible for planning policy to prescribe this.	No Change.
	* Object to introduction of Code Level 3 from 1st October 2010 as there is no national or regional requirement - should be delayed until after the plan is adopted.	The policy requirement will not apply until the plan is adopted. Note, energy requirements are already dealt with under changes to Building Regulations	Amend to state Code level 3 will be required from adoption of Core Strategy.
	* Reference to changes to Part L Building Regulations is welcomed as in 2013 the requirements will be largely unnecessary for a Core Strategy policy to prescribe. The Council is therefore advocating that Code for Sustainable Homes Level 3 is achieved in the meantime. These measures are largely supported as it has long been established that it is the building regulations process that will manage environmental improvements and carbon reductions in the way that homes are built in the future.	Support noted.	No Change.
	* Policy EQ1 is above current Building Regulations standards, feasibility will need to be looked at on a site-by-site basis. See para 30 of PPS1 - there are no exceptional local circumstances, so policy should be more flexible allowing assessment on a site by site basis.	Policy EQ1 reflects Building Regulations standards by requiring Code levels in line with concurrent changes to Building Regulations CO2 emissions, although the recent announcement by the Government to change the definition of 'zero carbon' from level 6 to level 5 could necessitate a consequential change to EQ1. EQ1 as worded only requires the specified Code and BREEAM levels "...unless it is proven not to be feasible or viable" and at specified areas in line with national policy.	Change requirement for level 6 from 2016 to level 5 on the presumption that Government proposals to change the definition of zero carbon homes from level 6 to level 5.
	* All policy requirements for energy efficiency and renewable energy should only be mandatory where it is both viable and practical.	Policy EQ1 as worded requires the proposed standards unless it is proven not to be feasible or viable.	No Change.

	* The requirement for Yeovil Urban Extension dwellings to meet "at least Code for Sustainable Homes Level 6 from 2016" is unviable in current economic climate. Policy is unsound.	Policy EQ1 as worded requires the proposed standards unless it is proven not to be feasible or viable, although the recent announcement by the Government to change the definition of 'zero carbon' from level 6 to level 5 could necessitate a consequential change to EQ1.	Change requirement for level 6 from 2016 to level 5 on the presumption that Government proposals to change the definition of zero carbon homes from level 6 to level 5.
	* Object on the basis that climate change mitigation and adaptation should only apply to "development proposals of an appropriate nature, size and scale."	Policy EQ1 as worded makes clear that measures will be included "as appropriate". It is considered that the proposed change would lessen the effect of EQ1, and therefore would not be consistent with national policy.	No Change.
	* Not clear that low carbon technology choices are being encouraged.	Disagree - the policy specifically states that "development of decentralised and renewable or low carbon energy generation will be encouraged and permitted..."	No Change.
	* Lacks consideration of local energy generation and district heating. There is much opportunity for community heating through combined heat and power at local schools, hospitals etc - this is ideally suited for areas of terraced housing and flats in town centres, where there is not the ground area per home to make heat pumps viable. Also potential for biomass wood chip heating from the hedgerows that are routinely cut on an annual basis.	EQ1 does encourage development of decentralised and renewable or low carbon energy generally, but may be useful to explain potential in South Somerset for local energy generation and district heating in supporting text.	Add explanation of the potential in South Somerset for local energy generation and district heating in supporting text.
	* Would like to see more use of wood as a renewable energy source (providing harvesting is sensitive and respects biodiversity) to help deliver environmental and social benefits from the woods to society. Developing a market for low-grade timber will also benefit other woodland management projects, making them more economically viable.	Noted.	Add the potential for wood as a renewable resource in the description in para 12.9.
	*Would like the role of woodland included in the reference to flooding - positive land use management of the natural environment can benefit both flood amelioration and water purity. Would like a bullet point referencing the positive role that carefully targeted woodland can play in solving flooding and water quality issues.	The role of woodland in combating flooding and water quality issues is referred to in supporting text to Policy EQ4 Green Infrastructure, but may also be useful to reference in flood risk supporting text section also. However, it is considered that the general policy in EQ1 allows specific issues such as using woodland to come forward.	Briefly refer to positive role of woodland in combating flooding and water quality issues in supporting text to flooding section.
	* Lots made of energy efficiency, but little about water conservation - this is vital for the future, please include.	Disagree - water efficiency is already specifically mentioned in EQ1 bullet point 8, and described in para 12.14.	No Change.

	* MOD Defence Estates Safeguarding wish to be consulted on all wind turbine planning applications to verify that they will not adversely affect defence interests - noted that this has been taken into account.	Support noted.	No Change.
	* In addition to wind energy, suggest that EQ1 also addresses solar photovoltaic development as there is increasing interest in this in South Somerset.	The impacts of solar PV would be generally covered by the fourth bullet point, but agree it would be useful to add further local context e.g. solar farms in supporting text.	Add further context for solar PV development in supporting text, including local issues and impact of Feed in Tariff.
	*Bullet 6 duplicates national policy - would development in these areas be against policy.	This is consistent with national policy and specifically mentions the South Somerset Strategic Flood Risk Assessment, but agree that further 'local' detail is required.	Add that the area of search to which the sequential test will apply will be determined on merit in relation to the nature and location of the proposal, but will be district wide unless justified otherwise by the applicant to bullet point six.
	* Would like a separate flood risk policy rather than having as part of a Climate Change policy, as it would give flood risk a stronger policy position.	Do not agree that simply moving flood risk to a separate policy would give it a stronger policy position.	No Change.
	* Criteria on flooding needs to make reference to schemes which pass the Exceptions Test in order to comply with PPS25.	Agree that reference to Exception Test would fully reflect the strategic approach to directing development away from sites that flood.	Add reference to exception test in Policy.
	* Support the policy but would wish to see a number of amendments to strengthen the policy in relation to potential impacts of renewable proposals on birds. Agree no wind farm should be within 800m of any internationally designated site and wish to see this included in the Policy.	National policy (PPS22) states that buffer zones should not be created around international or national designations that prevent renewable energy development, although it is worth noting that the draft National Planning Policy Framework does not include this specific requirement. The draft Habitats Regulations Assessment recommended that wind farm developments are likely to be considered unacceptable within 800m of the international sites - this is included in the supporting text.	No Change.
	* Policy should refer to the internationally important Somerset Levels and Moors as well as the Severn Estuary.	The Somerset Levels and Moors Habitats Regulations Assessment recommends the reference to Severn Estuary, but there was no such recommendation to refer to Somerset Levels and Moors.	No Change.

	* Policy refers to potential barrier risks of renewables to birds. This should include all potential adverse risks, including bird strike and disturbance which can be equally significant in certain circumstances.	The wording is as recommended by the Somerset Levels and Moors Habitats Regulations Assessment. Other potential adverse risks would be covered by bullet point five.	No Change.
	* Potential to have adverse effects on biodiversity e.g. bats are vulnerable to mortality from incorrectly located wind turbines, such as along flight lines, close to feeding areas or roost sites. Developers must demonstrate that proposed wind turbines do not pose a risk to bat populations - full survey data and assessment should be submitted.	Noted. Policy EQ3: Biodiversity requires a survey where protected species are present but would be useful to reference this in the supporting text to EQ1.	In supporting text refer to need for ecological survey as set out in EQ3.
	* Pleased to see bullet point stating that susceptibility to climate change is taken into account on all development sites with biodiversity interest - it is important to deliver an increase in wider linked areas of conservation management in the landscape as a whole - in current state, key habitats are simply not sustainable given their fragmented character and immobile nature of many of their characteristic species which are locked in by the surrounding environmentally hostile landscape. Therefore would like to see creation of new natural habitats around existing valuable conservation habitats, together with a reduction in intensity of agricultural practices.	Support noted. Policy EQ4: Green Infrastructure seeks to create a network of connected and multi-functional open spaces. The intensity of agricultural practices is outside the remit of the planning system.	No Change.
	* PPS1 states that spatial strategies should conserve and enhance biodiversity - therefore should take positive action to identify areas for new habitat creation to make conservation habitats more sustainable in response to global warming. Add "...by encouraging landscape scale connectivity to deliver ecosystems services benefits" to final bullet point.	This point is already incorporated in Policy EQ4: Green Infrastructure seeks to create a network of connected and multi-functional open spaces.	No Change.
	* Policy does not include the text and policy wording from the findings of the HRA on Bracket's Coppice SAC and therefore the Core Strategy cannot be considered to be Habitats Regulations compliant (suggested additional paragraph supplied).	Noted.	Amend text to reflect suggested change.
	* Specifically mention the need to incorporate significant green infrastructure including street trees, green walls and roofs, to minimise the urban heat island effect, soak up excessive water runoff and reduce flood risk.	This is covered by Policy EQ4: Green Infrastructure.	No Change.

	* Add the need to maintain soil function.	This is not within the remit of the Core Strategy.	No Change.
	* In line with national policy, should set out the circumstances under which particular types of renewable energy development will be acceptable in AONBs. There should be acknowledgement for the protection of AONBs setting and should not create a buffer zone around the designation.	National policy (para 11, PPS22) states that criteria based policies should set out the circumstances in which particular types and sizes of renewable energy developments will be acceptable in nationally designated areas - EQ1 refers to impacts generally rather than national designations in order to be more concise and consistent with other national policy (e.g. PPS7).	No Change.
	* Surprising that policy does not make any reference to the contribution of transport to reducing CO2 emissions. Further reference to BREEAM should be made in the travel plan/transport parts of the Core Strategy. Policy should state that the final standards to be adopted may be in excess of BREEAM standards where appropriate for individual units at the discretion of the planning authority.	Policy TA1 Low Carbon Travel includes measures that would minimise transport CO2 emissions. Adding further references to BREEAM may cause unnecessary repetition. EQ1 states "at least" in relation to BREEAM standards.	Supporting text to EQ1 should cross reference measures to minimise transport CO2 emissions.
	* There are a number of things that should be done now to encourage sustainability: all new houses to have solar panels for water heating or electrical regeneration; all new houses should have water recycling systems; more cycle paths are needed especially along single carriage way roads such as A37; switch off street lighting in rural areas e.g. Cartgate; use waste for power generation; better public transport.	These measures would be generally supported in order to minimise CO2 emissions, subject to site specific issues.	No Change.
	* Produce an SPD assessing areas of geographical constraint within the district for the development of renewables, especially wind farms; including specific assessment of risk to water birds using and moving between internationally designates sites and other key wetlands.	Noted.	No change. Renewable Energy SPD should be considered as part of Local Development Scheme review in autumn 2011.
Design/General Development			
Policy EQ2 Design (and paras 12.22 - 12.30)	* Adopt good design principles which encompass noise mitigation in order to minimise the environmental impact both on, and from, new development. Principle for residential development near to busy roads should take account of Noise Action Plans.	Noted. PPS25 adequately deals with this.	No change

	* An additional criterion should be added so design is assessed in its ability to minimise the risk of existing noise affecting external spaces not covered under the CABE assessment. Development proposals , extensions and alterations to existing buildings, structures and places are expected to "minimise the impact of existing or foreseen unwanted environmental influences."	Noted. PPS25 adequately deals with this.	No change
	* Paragraph 12.26 - Whilst acoustic performance is considered as part of Building for Life criterion 20 it does not rate the design in terms of associated open space such as garden or veranda. Design should minimise the environmental impacts of noise and traffic. This should also apply to public open space. Additionally the requirements for good acoustic environments should apply to all educational settings and policy could clarify this as an objective.	Noted. PPS25 adequately deals with this.	No change
	* English Heritage has major concerns that the current plan is not sound in terms of meeting the requirements of PPS5 Planning and the Historic Environment.	In the drafting of this policy we were conscious of the need not to duplicate the guidance and policy within PPS5. Following the publication of the Draft NPPF for consultation and with regard to approaching change in National Policy and in line with consultation responses, this may need to be considered further.	No Change.
	* All mention of the historic environment has been incorporated into a policy for Design. It should be treated as a separate policy under the general title of Environmental Quality or could be combined with a Biodiversity policy. Aware of the requirement not to repeat go guidance and policy but in line with PPS5 suggest policy wording to be inserted (English Heritage rep).	In the drafting of this policy we were conscious of the need not to duplicate the guidance and policy within PPS5. Following the publication of the Draft NPPF for consultation and with regard to approaching change in National Policy and in line with consultation responses, this may need to be considered further.	No Change.
	* Para 12.28 - historic parks and gardens should be specifically identified.	These will be included within the maps to be produced within the Core Strategy.	Noted.

	* This policy is confusing and it is strongly recommended that there should be a distinct suite of policies concerned with landscape character, the historic environment, and the detailed design of development.	At the time of drafting of this policy we were conscious of the need not to duplicate national guidance and policy in line with PPS12. It was envisaged that more detailed guidance would be brought forward, such as Landscape Character Assessments, would be brought forward as Supplementary Planning Documents. Following the publication of the Draft NPPF for consultation and with regard to approaching change in National Policy and in line with consultation responses, this may need to be considered further.	No Change.
	* The following bullet points are hard to distinguish: complement and consolidate the landscape character of the area; reinforce local distinctiveness and respect local context. Should use more widely understood landscape terms such as conserve/maintain and enhance landscape character in line with the philosophy of the European Landscape Convention and Landscape Character Assessment Guidance. The term 'enhance' also engenders the notion that benefits can be gained from change.	Noted.	Amend wording to clarify policy objectives.
	* EQ2 is lacking in detail and substance, and should rely on policies ST5, ST6 and EC3 from the local plan until specific design guidance comes forward (ref. Para 12.24).	Saved Local Plan Policies ST5, ST6 and EC3 will be superseded by the Core Strategy Policies following adoption. There are already a number of supporting documents and design guides, details of which have been footnoted in the Draft Core Strategy. These are being reviewed and will be updated.	No Change.
	* EQ2 wording needs to be tightened.	Noted.	Amend wording to clarify policy objectives.
	* EQ2: add 'environment' to follow '...high quality'; include basic design criteria; final bp: 'design guidance' rather than 'development management guidance'; safeguards the integrity of designated wildlife sites, but omits similarly designated heritage and landscape sites.	First point noted. The bullet points are rather confusing - final bullet point to be considered; fourth bullet point 'conserve and consolidate landscape character'; third bullet point 'conserve and enhance heritage assets'	Amend wording to clarify policy objectives.

	*Although covered slightly in EQ2 the omission of policy relating to AONBs is considered significant. Important to acknowledge that it is not just major development that can effect AONBs, but development outside the designated area can also have an impact. Proposals for development should be informed by and be sympathetic to the distinctive character of the area and features that have been identified across the District.	Note, however AONB's have a national policy designation.	Amend wording to clarify policy objectives.
	*Suggest amending policy as it is not appropriate for certain projects to meet all of the criteria. Suggested wording ..."Where appropriate, development proposals, extensions and alterations to existing buildings, structures and places should ...".	Noted.	Amend wording to clarify policy objectives.
	*Suggested rewording to reinforce that policy is promoting high quality design. Opening sentence: "...preserves or enhances the character and appearance of the District." and second sentence of latter part of policy: "Development must not risk the integrity of local, national and international wildlife and landscape designations."	Noted.	Amend wording to clarify policy objectives.
	* Support this policy as spatial planning should deliver locally distinctive, sustainable development of high environmental quality. The natural environment should be at the heart of all new development with environmental assets designed into development from the outset.	Noted.	No Change.
	*Quality and design of buildings is critical, the space between buildings is also important for well-being, and the relationship between old and new buildings must be considered.	Noted.	No Change.
	*NHS Somerset would like to see Policy EQ2 promoting high quality, inclusive design involving a range of social, economic, and environmental determinants of health - from public health perspective, employment is a key determinant of health, so would support new developments and designs which maximise local access to employment opportunities.	Noted.	Amend wording to clarify policy objectives.
	*Use more local and traditional materials and building styles.	Noted.	No Change.

	*Policy should support neighbourhood level architectural distinctiveness.	Noted.	No Change.
	* Development proposals should ensure that habitat features that are used by bats and other wildlife are maintained so that the design does not cause severance or is a barrier to movement.	Noted.	No Change.
	* Paragraph 12.26 refers to building guidance, Somerset Waste Partnership have written developer guidance to help enable design to be fit for purpose with regard to recycling and waste collections. Whilst this may be too specific for the CS please consider it (copy of guidance provided).	As this guidance is already provided at a County level, it would be unnecessary to duplicate this within the Core Strategy. Consideration of this should be assessed during the Development Management process.	No Change. Add reference in Design Guides list
	*Environment Agency feel reference should be made to the Somerset Waste Plan and how it will influence development, for example there should be a reference on how new development will have areas for recycling storage.	As this guidance is already provided at a County level, it would be unnecessary to duplicate this within the Core Strategy. Consideration of this should be assessed during the Development Management process.	No Change. Add reference in Design Guides list
	* Paragraph 12.27 - Would question if Secure by Design deserves unconditional support given that it contains a number of aspirations which are contrary to many of the sentiments within the Core Strategy. Number of examples listed by SCC.	Agreed, there are some contradictory aspects of Secure by Design when used to consider developments (such as connectivity versus creation of 'rat runs').	Amend wording to clarify policy objectives.
	*Much of thrust of the Core Strategy and Eco Urban Extension is to encourage the construction of all buildings in the District with higher Code Levels. Presentations by SSDC have stated that 'super insulated buildings' will 'look very different to traditional housing', Policy EQ2 is written in a manner which could prevent the Eco Urban extension from ever taking off. Some wording should be added to policy to relate to eco friendly development.	Whilst level 6 and zero carbon housing can look different, it is not essential in order to achieve these ratings. Eco housing can be designed to respect the local vernacular.	No Change.
	*Inappropriate development should not be allowed and enforcement action should be taken.	Proposals for development area considered in accordance with plan policy but must have regard to material considerations. Enforcement action is applicable against unauthorised development and the expediency of taking action is considered on a case by case basis	No Change.
	*Add note explaining where further guidance could be obtained and so users know if they're referring to the most up to date material.	All supporting documents should be listed on the SSDC website.	No Change.

	*MOD states that developments that fall within the statutory safeguarding zones will need to be appropriately assessed.	Noted.	No Change.
	*To minimise the visual impact of development, developers should be required to put a 3 metre wide wooded area around the edge of all development and industrial buildings on the edge of developments facing countryside to be coloured dark brown or green.	Agree in principle but aspects of materials to be used in development and a landscaping scheme should be considered on an application basis through the Development Management process.	No Change.
	*Does this support screening, camouflage or specifications for external lighting - could we specify where such protections would apply.	Agree in principle but aspects of materials to be used in development and a landscaping scheme should be considered on an application basis through the Development Management process.	No Change.
	*Lots made of energy efficiency, but little about water conservation - this is vital for the future, please include.	Water conservation is an aspect of development that should be designed within the development. Other aspects of water management such as flood mitigation should be considered within the context of the Green Infrastructure Strategy and new infrastructure identified within the IDP	Amend text to include water conservation within the context of the Green Infrastructure.
	* If a particular design concept for a development is presented and approved/accepted at outline stage then it is important that this is followed through and not modified without good cause. In addition proposals should : avoid gardens being too small; avoid tiny footprint house sizes, avoid a "canyon" style street scene; avoid street scene littered with bins, avoid play space being isolated by inappropriate access (e.g. busy road crossing).	Acknowledged the use of design codes could be agreed at outline stage of the application process. Aspects such as garden size and connectivity of play and open space are issues that could be considered within the Green Infrastructure Strategy.	Include 'design codes and or master plans were appropriate' within the supporting text for the policy.
Biodiversity and New Development			
Policy EQ3 Biodiversity (and paras 12.31 - 12.40)	* Amend final sentence of para 12.34 to "...and to draw up plans to assist in their conservation."	Noted.	Amend wording to clarify policy objectives.
	* Suggest that South West Nature Map is also included as a document that identifies areas that are a priority for enhancement of biodiversity (para 12.37).	This is an electronic mapping system available through Biodiversity South West.	No Change.
	* The first two sentences of para 12.38 should form part of 12.37, and the remainder of 12.38 should be a new section. SSDC's local validation guidelines should provide guidance on types of development and the type of information required to be submitted prior to validation.	Noted.	Amend wording to clarify policy objectives.

	* Paragraph 12.38 - Development proposals should be accompanied by full survey information for European Protected Species as these cannot be conditioned as part of a planning permission. It should be noted that planning applications will not be registered unless full survey information is provided up front (suggested additional text supplied).	Policy does state applications should be accompanied by a survey where the presence of protected species is suspected. This is consistent with our validation process which requires they be provided before a planning application is registered.	Amend wording to clarify policy objectives.
	* Paragraph 12.38 - No mention has been made of Somerset Biodiversity Partnership's priority species list for Somerset - now available on the Somerset Environmental Records Centre web site. These species would be a material consideration in the determination of planning applications.	Noted.	Add reference to the list in para. 12.34.
	* Paragraph 12.40 - The changes to policies and text resulting for the Habitats Regulations Assessment of Bracket's Coppice SAC have not been included.	Noted.	Include additional bullet point in the policy "Ensure that habitat features that are used by bats and other wildlife are maintained so that the design does not cause severance or is a barrier to movement'.
	* The policy should be strengthened through clearer requirements for provision for survey information and assessment than that given.	Noted.	Amend wording to clarify policy objectives.
	*"Seek" to protect biodiversity is not strong enough.	Noted.	No Change.
	* Support this policy as spatial planning should ensure the highest level of protection and enhancement for protected habitats, sites and species and an appropriate level of protection and enhancement outside designated sites.	Noted.	No Change.
	* Expand policy to include landscape protection and enhancement; the highest levels of which should be given to AONBs. All landscapes should be planned, managed and protected for their landscape character, their contribution to quality of life and the ecosystem services they provide.	Not appropriate for a Biodiversity policy.	No Change.
	* SSDC has a duty to maintain the 'favourable condition status' of European Protected Species under Regulation 9 of the Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations').	Noted - The Core Strategy policies do not supersede other national or European regulations.	No Change.

	* Delete "...including those which would affect sites of regional and local biodiversity and geological interest..." from policy as relatively few proposals affect locally designated sites compared to the number that impact on protected species. Question the value of referring to sites and whether it detracts from the wider scope of biodiversity impacts.	With nearly 600 local and regionally identified wildlife sites, it is sensible to ensure they are afforded the same protection as the National and International designations.	No Change.
	* Not comfortable with final bullet point of EQ3: the beneficial features most appropriate for incorporation will be dependent on any existing habitats/features/species present, or near the site; therefore the type of development should be influenced by a lot more than just the South Somerset BAP. There is also repetition with the second bullet point.	Noted, bullet does however say "with particular reference to the objectives of the South Somerset Action Plan" and not sole reference.	No Change.
	* Amend final para of EQ3 to: "...accompanied by a survey and impact assessment and if negatively impacted the proposal must provide appropriate mitigation which may include measures or amending the proposal to avoid impacts, mitigation and/or compensation."	Noted, suggestion is unduly prescriptive and a matter of judgement associated with a particular planning application.	No Change.
	* Amend final para of EQ3 to "a reasonable likelihood" rather than 'reason to suspect' to be consistent with PPS9.	Noted.	Amend wording to clarify policy objectives.
	* The core strategy is missing a policy specific to SSSI's that aren't part of an international designation, as required by PPS9.	This policy seeks to protect all biodiversity within South Somerset, including SSSI's. The vast diversity of protected sites from International designation to Local Wildlife Sites are mentioned in the text in para 12.32.	Amend wording of Policy EQ3 to clarify.
	* The core strategy is missing a policy specific to Local Wildlife and Geology Sites, a required by PPS9.	This policy seeks to protect all biodiversity within South Somerset, including SSSI's. The vast diversity of protected sites from International designation to Local Wildlife Sites are mentioned in the text in para 12.32.	Amend wording of Policy EQ3 to clarify.
	* The core strategy is missing a policy specific to Priority Habitats (para 11, PPS9) now listed in Section 41 of the NERC Act.	This policy seeks to protect all biodiversity within South Somerset, including SSSI's. The vast diversity of protected sites from International designation to Local Wildlife Sites are mentioned in the text in para 12.32.	Amend wording of Policy EQ3 to clarify.

	* The core strategy is missing a policy specific to networks of natural habitats (para 12, PPS9) - this is not fully covered by policy EQ4.	This policy seeks to protect all biodiversity within South Somerset, including SSSI's. The vast diversity of protected sites from International designation to Local Wildlife Sites are mentioned in the text in para 12.32.	Amend wording of Policy EQ3 to clarify.
	* The core strategy is missing a policy specific to Priority Species that don't benefit from statutory protection (para 16, PPS9) - also listed in Section 41 of the NERC Act. There is also a corresponding list of such species that occur in Somerset.	This policy seeks to protect all biodiversity within South Somerset, including SSSI's. The vast diversity of protected sites from International designation to Local Wildlife Sites are mentioned in the text in para 12.32.	Amend wording of Policy EQ3 to clarify.
	*Environment Agency - some watercourses in the District are classed as 'over abstracted or over licensed' in terms of water availability. Essential that all new development does not put extra stress on water supplies. Assume that Wessex Water have been consulted to ensure that they can meet increased supply pressure without increased stress to the ecological needs of the water environment.	Noted - the provision of water supply to serve new development has been looked at through the IDP.	No Change.
	*MOD must be consulted on habitat development plans to ensure that the risk of bird strike incident is not increased. All proposals that fall within the safeguarding bird strike zone surrounding the aerodromes should be appropriately assessed.	Noted.	No Change.
Green Infrastructure			
Policy EQ4 Green Infrastructure (and paras 12.24 - 12.45)	* Need more explanation to introduce green infrastructure - where has the concept come from? What are the national objectives of its identification and development?	The concept for GI comes from PPS12 (p8), PPS1 (p7) and was endorsed through the RSS. The first paragraph attempts to identify what GI is, having reference to the Green Infrastructure Guidance from Natural England. The paragraphs try to expand upon what is quite a difficult concept to understand.	Amend wording to clarify policy objectives.
	* Para 12.42 is not clear - is this written in relation to existing communities; new development; district-wide recreational facilities? Clearer definition and focus needed.	This is an expansion of the concept of GI and applies to all development, both existing and proposed.	No Change.
	* Paragraph 12.42 - Last sentence should refer to horse riding as well.	It identifies the opportunities for corridors but the list is not exhaustive.	No Change.
	* Paragraph 12.43 - It is incorrect to imply that trees can help reduce noise levels. For the density of tree planting likely to arise with new developments it is unlikely that significant noise attenuations will exist. A more important aspect of planting trees is the ability of them to create masking noise and the level of this will depend on the species and maturity.	Planting 'noise buffers' composed of trees and shrubs can reduce noise by 5-10 decibels for every 30m width of woodland. Planting requirements would be decided on the basis of individual planning applications.	No Change.

	* EQ4 is not clear on how green infrastructure will be provided - can be done in conjunction with new development but what other measures are intended?	The provision for GI can be incorporated in new development. The policy aims to preserve existing provision and the strategy is to look at new development and link this to the existing.	No Change. (More detail on proposals and the ability to deliver would be considered in the GI Strategy).
	* Support the concept of multi-functional green infrastructure as a way of delivering a range of benefits for the natural environment and for people, including health and recreation, climate change adaptation, sustainable transport and biodiversity. Green infrastructure should be provided as an integral part of all new development alongside other infrastructure such as utilities and transport networks.	Support Noted.	No Change.
	* Strongly support this policy, particularly the reference to new habitats. Also support the need for greater managed access to recreational opportunities, including where facilities are suitable the Somerset Levels and Moors.	Support Noted.	No Change.
	* Seek clarification in document that where green corridors are too narrow the potential multifunctional use diminishes dramatically as there are potential conflicts.	Noted.	No Change. (This level of detail should be promoted through the GI Strategy.)
	*Environment Agency require stronger reference and position on the use of SuDS in this policy.	The provision of SuDS would be issues that are assessed in conjunction with planning applications for development, in consultation with the Environment Agency.	No Change. (This level of detail should be promoted through the GI Strategy.)
	* The benefit of trees in reinforcing local character and distinctiveness should be noted, e.g. the beech on Blackdown Hills; Selwood Vale's oaks, and the willows on the levels and moors.	Noted.	No Change. (This level of detail should be promoted through the GI Strategy.)
	* Recommend a stronger emphasis on landscape character and landscape features rather than simply public open space.	Noted - in the context of GI, other landscape character/features are considered within the context of Policy EQ2.	No Change. (This level of detail should be promoted through the GI Strategy.)
	* Add the following benefits of green infrastructure; environmental education; local food production - in allotments, gardens and through agriculture; and improved health and well being - lowering stress levels and providing opportunities for exercise. Refer to Natural England guidance on green infrastructure.	Noted.	Amend wording to clarify policy objectives.
	*Green infrastructure should be used to mask unsightly development.	Noted.	No Change.

	*Does this extend to giving protection to those trees which are to be specifically retained in a development.	GI would look to encompass the retention of existing vegetation within new developments. This would be considered in the context of the planning application and protection of them should be conditioned and enforced in the development management process.	No Change.
	*MOD must be consulted on habitat development plans to ensure that the risk of bird strike incident is not increased. All proposals that fall within the safeguarding bird strike zone surrounding the aerodromes should be appropriately assessed.	We are aware of the MOD's concerns and they will continue to be consulted on individual projects in line with the Development Management procedure. Any further Strategies produced will need to be consulted on at that time.	No Change.
	* It might be useful to include an extra bullet point: 'provide enhanced pedestrian networks and traffic-free cycle links to contribute to increased sustainable connectivity.'	Noted.	Amend wording to clarify policy objectives.
	* Need to clarify the final sentence of EQ4:- adverse impact on what - existing size/area, net size/area, quality, biodiversity or other components?	Noted.	Amend wording to clarify policy objectives.
Woodlands and Forest			
Policy EQ5 Woodlands and Forest (and paras 12.46 - 12.48)	* Should mention importance of hedges, especially as a habitat.	Hedges not adjacent to housing are currently protected under the Hedgerow Legislation, hedges within urban areas would fall within the Green Infrastructure.	No Change.
	* Recommend that ancient semi-natural woodland is also explicitly identified to be protected against loss.	Semi natural woodland is specifically mentioned within the policy.	No Change.
	* Mature woodland should also be protected against loss wherever possible, in addition to ancient and veteran trees. It will not be possible to replace mature woodland, as new planting will lack the diversity of age and structure that any lost mature woodland has.	Noted.	Amend wording to clarify policy objectives.
	* EQ5: greater strength should be given to protection of Ancient Woodland as 'once lost it cannot be recreated' (PPS9), and should be given greater protection than secondary woodland (around 50-200 years old) and is less likely to support the range of species in an Ancient Woodland.	Noted.	Amend wording to clarify policy objectives.
	*Hope this policy will protect the trees around Yeovil, especially on the horizon lines (especially southern horizon, when urban extension is built).	Policy applies to all woodland - specific trees worthy of retention could be protected by a TPO.	No Change.

	*Very pleased to support the policy, would like to add: 1)new woodland creation is rising up the Coalition Government's agenda 2)pleased to see the reference to maintaining ancient woodlands to at least 2005 levels and last sentence, but note you cannot replace ancient woodland, and it is one of our richest wildlife habitats. PPS9 states that ancient woodland is a valuable biodiversity resource, and the NERC Act 2006 places a statutory duty on all public bodies to conserve biodiversity. Like to see last sentence of policy amended to read "Where secondary woodland is unavoidably lost through development it should be replaced with appropriate new woodland on at least the same scale."	Noted.	Amend wording to clarify policy objectives.
	* It will not be possible to replace mature woodland as new planting will lack the diversity of age and structure of that loss. All woodland of a certain age should avoided by development.	Noted.	Amend wording to clarify policy objectives.
	* Will the replacement of any lost woodland be replaced with similar of just a few token 'cheap' trees?	Policy stipulates replacement with appropriate new woodland on at least the same scale	No Change.
Air Quality			
Policy EQ6 Air Quality (and para 12.49)	* Support Policy EQ6.	Noted.	No Change
	* There is a disparity between the treatment of air quality and other impacts of increased traffic resulting from developments. It would seem more appropriate to require developments to mitigate for theory air quality effects where relevant in the same way they for impacts on congestion etc.	Policy does require the adoption of mitigation measures.	No Change.
	* EQ6: cannot envisage any measures that could be employed to mitigate against increased air pollution from development and increased traffic that would impact upon internationally designated nature conservation sites. It would not be possible to enforce lower traffic levels or vehicle emissions within a certain area. The nature of air pollution and deposition makes 'mopping up' of pollutants unfeasible. Therefore avoidance in the first place seems the only option.	Other constraints would prohibit development near to internationally designated nature conservation sites. Therefore unsure of the relevance of this comment.	No Change.

	*Is it reasonable to apply this policy throughout the Yeovil AQMA, when only two areas (Hospital & Lyde Road) have levels above the national requirement? A maximum level, not worsening would seem a wider test.	The policy provides for the future of the plan period and covers for possible eventualities. The method of testing falls within the responsibility of Environmental Protection.	No Change.
Equine Development			
Policy EQ7 Equine Development (and paras 12.50 12.52)	* Policy does not include the wording from the findings of the HRA on Brackets' Coppice SAC and therefore the Core Strategy cannot be considered to be Habitats Regulations compliant. The policy only provides for land within designated sites and does not take account of ecological functioning supporting conservation objectives of Natura 2000 sites (suggested text for additional bullet point).	This comment relates to Bat protection zones and is not applicable to this policy.	Take into consideration in the context of Policy EQ3.
	* This policy is out of context in a chapter on environmental quality - equine development does not add to the environment in any way. EQ7 should follow EP9, farm diversification.	The aim of this policy is to consider the environmental impact and potential cumulative harm of equine development on the landscape. Economic impact of horsiculture is covered within national policy and EP9 farm diversification.	No Change.
	* Have stronger references to landscape character and the development integrating with that landscape character.	Noted.	Amend wording to clarify policy objectives.
	* Add provision of off-road tracks to ensure horses can be exercised away from traffic.	Provision of new bridleways could fall within GI, not a viable inclusion within this policy	No Change.
	* 3rd bullet point after 'internationally designated sites' add '...including to features outside the site's boundaries which nonetheless ecologically support the conservation objectives of the designated sites.'	Noted.	Amend wording to clarify policy objectives.
	*Suggested rewording of third bullet point: "...adverse impacts to the integrity of national and international wildlife and landscapes designations."	Noted.	Amend wording to clarify policy objectives.
	*Careful consideration should be taken concerning the development of new equestrian centres falling in the vicinity of MOD aerodromes to ensure they are not affected by aircraft noise.	These issues would be assessed within the context of the Development Management process.	No Change.
	*Reference is made to Equine Enterprises and equine activity - need clarify. Equine activities are wider and would allow leisure, not just commercial activities.	Policy refers to both horse related facilities and equestrian enterprises. It sets out the parameters to limit potential environmental impact for all "horsiculture".	No Change.
	*Provision of walks and rides should be considered as part of our tourism/equestrian offer.	Provision of new bridleways could fall within GI, not a viable inclusion within this policy	No Change.

	*Will equine activities be permitted only close to settlements, or is this only relevant to equine enterprises (i.e. businesses)?	Policy applies to all horsiculture.	No Change.
	*Proximity to Bridleway network requirement would be problematic for existing equine developments in Area East - should be a consideration only, not applied rigorously.	This was included in the supporting text as a consideration in assessing development proposals.	No Change.
Implementation and Monitoring			
Implementation and Monitoring (paras 13.1 - 13.5)	* Paragraph 13.5 - The average percentage of single occupancy vehicles in modal split targets within travel plans in South Somerset or towns in South Somerset would provide a valuable local indicator.	This may provide an indication of the effectiveness for car sharing, but unsure whether this information is available. In order to obtain any meaningful information a traffic survey would need to be carried out on a number of occasions throughout the year.	Monitoring of travel plans is carried out County Highways.
	* Table page 184: Not clear what the Core Indicator refers to or what the definitions are. E.g. under No.7 a Core Indicator is " E2: Change in areas of biodiversity importance". Which areas are these in South Somerset and will the plan have any influence over them? What is an area of 'biodiversity importance'?	Details of the areas in South Somerset are covered within The Distribution of European Protected Species in South Somerset (2009) and European Protected Species Assessment (2009), which forms part of the evidence base for South Somerset. Areas of biodiversity importance are areas identified for their value, such as Nature Reserves, SSSI's and Local Wildlife Sites. More details are available in the written text supporting Policy EQ3.	No Change.
	* (OBJECTIVE 4) - should include monitoring of delivery of planning agreements and obligations - highways improvements, paths etc.	This is done separately by the S106 Officer who reports on a six monthly basis to the area committees.	No Change. (Possible inclusion of a summary of these reports within the AMR.)
	* (OBJECTIVE 9) - Core Indicator E1 - Environment Agency would welcome inclusion of a more robust measure - "refusal of permission for developments where an EA objection on water quality grounds can not be overcome".	This would be controlled through the Development Management basis on an individual planning application basis.	No Change.
	* (OBJECTIVE 9) - Should also be consideration of noise as part of item 9 including noise from traffic. The NAP process will identify regions of tranquillity in the future and the number or total area of protection might be considered an indicator of environmental acoustic quality and impact of noise from commercial or industrial areas on residential development might be measured by complaint statistics.	Planning and Noise is currently covered by PPG24, review may be necessary with regard to the forthcoming NPPF. Noted, a way of measuring complaints may identify if the policy controls need to be reconsidered.	No Change. (Consider inclusion in the AMR.)
	* '50 % modal shift target' should presumably be 50% modal share by walking, cycling and public transport.	The target of 50% modal shift is a Town and Country Planning Association target which stems from the Eco Towns Transport Worksheet.	No Change.

	<p>* The failure to establish any objective to safeguard the historic environment despite the numerous references to its sensitivity means that no actions are carried forward to implement any measures to assist in: promoting conservation, fostering a sense of community pride, contributing to economic prosperity, contributing to education and health and facilitating the wider enjoyment of tourists and visitors. No single monitoring measure to ensure that national and local policies are applied.</p>	<p>The objectives of the Core Strategy are based upon the spatial elements of the Sustainable Community Strategy. The table reflects these objectives and identifies which policies are instrumental in the delivery of them. The use of these policies are monitored annually to ensure their effectiveness and allow adaptation where it is identified that they are failing. With regard to the historic environment, no specific policy was included in the Draft Core Strategy, as this was already adequately covered in National Policy Planning Policy Statement 5. With the forthcoming replacement of the PPS's with the National Planning Policy Framework, this may need to be reconsidered.</p>	<p>No Change.</p>
	<p>* Core Strategy lacks monitoring proposals to assess any increase in people pressure at key development locations on the Somerset Levels and Moors SPA and Ramsar site. The monitoring of potential effects of increased people pressure and the effectiveness of any mitigation measures for any housing projects is essential.</p>	<p>The Somerset Levels and Moors Habitats Regulations Assessment states that unless new residents in Yeovil and other larger settlements have a particular interest in visiting the Levels and Moors i.e. bird interest, new residents are not expected to be visiting the site in any significant numbers. Additionally, bird species are not concentrated in areas where visitors tend to be due to a lack of suitable habitat. Natural England and Somerset County Council did not have any criticisms of the Somerset Levels and Moors HRA; indeed the HRA specifically states that "consultation with Natural England revealed that levels of recreational disturbance throughout the site are currently low" (section 5.1.1, 6.1). In the lack of any further evidence to suggest this could be a problem no change is proposed. This could be reconsidered later if it is considered that this is of particular concern.</p>	<p>No Change.</p>
	<p>* Core Strategy lacks any monitoring proposal for biodiversity on key sites and key species within the district. Object to the lack of a biodiversity monitoring plan.</p>	<p>Environmental Impact Assessment (EIA) is an important procedure for ensuring that the likely effects of new development on the environment are fully understood and taken into account before the development is allowed to go ahead. These are considered with the context of the Development Management Process. Other monitoring of specific sites of interest falls within the responsibility of Natural England</p>	<p>No Change. (The use of the Biodiversity policy will be done as part of the AMR.)</p>
	<p>*Farming should be involved.</p>	<p>Noted.</p>	<p>No Change.</p>