

Draft Core Strategy (incorporating Preferred Options) October 2010

Summary of issues - Part 4 - Housing and Economic Prosperity

Policy/Paragraph/Section	Summary of Issues	Officer Comment	Recommendation
Housing	Representation	Comment	Recommendation
Housing (paras 8.1 - 8.2)	* There does not seem to be an environmental policy linked to housing. New developments should contain environmentally friendly energy solutions such as solar and geo-thermal.	See Climate Change Policy EQ1	No change in this section
	* Why , when the RSS was revoked was the whole process not re-assessed especially in the light of national economic restraints and the drop in the housing market. Do not deny that SSDC has a duty to provide sufficient housing but this should be in a flexible way in response to a shifting environment.	RSS has not yet been revoked. Each LPA needs, however, to assess the appropriate levels of growth for their own area based on robust evidence. Baker Associates have produced this for SSDC "Housing requirement for South Somerset and Yeovil January 2011(and subsequent amendments) which forms part of the evidence base	No change
Strategic Housing Sites			
Strategic Housing Sites (para 8.3)	No Comments Received	N/A	N/A
Yeovil - North of Thorne Lane (Brimsmore)			
Yeovil - North of Thorne Lane (Brimsmore) (para 8.4)	No Comments Received	N/A	N/A
Yeovil - Lufton			
Yeovil - Lufton (para 8.5)	* Paragraph 8.5 - Development of Lufton is likely to effect populations of common dormice and horseshoe bats. South Somerset's evidence will need to demonstrate how the populations of these EPS are maintained.	Noted. Any planning application will need to be supported by the relevant ecological surveys. Outline permission has already been granted for development of this site.	No change
Crewkerne (para 8.6)	* Support the recognition that Crewkerne CLR site is integral to the wider and comprehensive regeneration of Crewkerne, and recognition of the sites good accessibility credentials and infrastructure delivery benefits.	Support Noted.	No Change.
Chard			
Policy HG1 Strategic Housing Sites (and para 8.7)	* Support Policy HG1.	Support noted.	No change.

	* Support the continued recognition of Crewkerne Key Site and its strategic importance in delivering residential development.	Support noted.	No change.
	*Support inclusion of CLR site.	Support noted.	No change.
	*Object to CLR being carried forward.	This Proposal has planning consent (subject to the signing of a S106 agreement) and it therefore considered to be deliverable and forms part of the Districts overall strategic housing allocation. See Crewkerne responses (paragraphs 6.80 - 6.85)	No change.
	* Support the inclusion of the Chard allocation however, it should identify the Chard Town Football Club site at Zembard Lane for residential development.	Support noted. The relocation of Chard Football ground is identified as being part of the Chard Regeneration Plan and as such it would be appropriate to amend the No Development area designation across this land as part of the overall Strategic Allocation	Amend No Development Area
	* Support the recognition of existing allocations in Chard.	Support noted.	No change.
Crewkerne	* Support the continued recognition of Crewkerne Key Site and its strategic importance in delivering residential development.	Support noted.	No change.
	*Support inclusion of CLR site.	Support Noted.	No Change.
	*Object to CLR being carried forward.	The principle of the CLR site was accepted through the Local Plan, it is strategically significant as it is part of the comprehensive regeneration of the town. It is appropriate to carry forward the site as although the principle of development has been accepted, the planning permission (05/00661/OUT) has not yet been granted.	No Change.

Housing Density			
Policy HG2 Housing Density (and paras 8.8 - 8.10)	* Support Policy HG2, high density development must be in accessible locations.	The comments in support of this draft policy are noted. However, further research into the issue of net housing density has been carried out (including a sample survey of the approximate net densities of 38 areas within Yeovil, Market Towns, Rural Centres and Rural Settlements) this demonstrates that there is a diverse range of net dwelling densities within South Somerset . In order to meet the demands of the housing market and to accord with national guidance there is a need to provide a mix of housing types and tenures at a variety of net dwelling densities, depending on the character and location of the proposal. Draft Core Strategy Policy HG5 seeks to achieve that mix of market housing type and tenure based on the evidence in the Strategic Housing Market Assessment. National guidance (PPS1 & PPS3) is clear that to achieve the objective of sustainable development, proposals should make the most efficient use of land whilst considering the impact on the character of the locality, with higher densities being located in places close to facilities.	Delete Draft Policy HG2. Amend Policy EQ2: Design by the addition of a criterion and relevant supporting text to address making the most efficient use of land whilst taking into account the surrounding spaces and landscape and give consideration to the inclusion of some of the PPS3 density criteria (paragraph 46). Add supporting text making the link to density criteria in paragraph 46 of PPS3.
		It is recognised that developers will not seek to bring forward proposals unless they are economically viable which in turn would suggest that they would seek to make the most efficient use of the land at their disposal. PPS3 no longer includes the national indicative minimum density (nor does the Draft National Planning Policy Framework, 2011) and in the light of the issues discussed in the research it is considered that it is no longer necessary or appropriate to retain Draft Core Strategy Policy HG2, instead net dwelling density should be addressed by the addition of a criterion/criteria within draft Policy EQ2 Design and supporting text making the link to the density criteria in paragraph 46 of PPS3.	
	*Support the approach and in particular last sentence.	See response above	See above

	* Quite rightly acknowledges that minimum density guidance figures in PPS3 have now been deleted, but the need to use land efficiently remains. Therefore, the range of densities in Policy HG2 is not unreasonable, and the final sentence of the policy is key to ensuring flexibility and making clear that each development opportunity must be considered on its own merits.	See response above	See above
	*Strongly support 50 dph for Yeovil Urban Extension.	Noted	No change
	*Support in respect of Ilchester.	Noted	No change
	* Welcome the acknowledgement that different densities may be justified by individual site circumstances but do not believe that the targets set are sufficiently flexible; amend to: Yeovil- 40-50 or more dwellings per hectare; Market Towns- 30-40 dph; Rural Centres- 30-40 dph; Rural Settlements- 30 dph.	The comments in support of this draft policy are noted. However, further research into the issue of net housing density has been carried out (including a sample survey of the approximate net densities of 38 areas within Yeovil, Market Towns, Rural Centres and Rural Settlements) this demonstrates that there is a diverse range of net dwelling densities within South Somerset . In order to meet the demands of the housing market and to accord with national guidance there is a need to provide a mix of housing types and tenures at a variety of net dwelling densities, depending on the character and location of the proposal. Draft Core Strategy Policy HG5 seeks to achieve that mix of market housing type and tenure based on the evidence in the Strategic Housing Market Assessment. National guidance (PPS1 & PPS3) is clear that to achieve the objective of sustainable development, proposals should make the most efficient use of land whilst considering the impact on the character of the locality, with higher densities being located in places close to facilities.	Delete Draft Policy HG2. Amend Policy EQ2: Design by the addition of a criterion and relevant supporting text to address making the most efficient use of land whilst taking into account the surrounding spaces and landscape and give consideration to the inclusion of some of the PPS3 density criteria (paragraph 46). Add supporting text making the link to density criteria in paragraph 46 of PPS3.
	*Density too low, 50 dph in rural areas and 60 dph in Chard and Yeovil.	See response above.	see above
	*A range of densities 30-50 dph is more acceptable.	See response above.	see above

	* It is important to clarify what is meant by net developable area as this often has a significant bearing on whether or not developments can genuinely achieve the desired densities. There are often significant disparities between PPS3 net densities and a developer's net density since the developer will deduct many more elements of the scheme to give a true net developable area, although it is acknowledged that what is important is the form, scale and nature of proposed development.	See response above. Planning Policy Statement 3: Housing (PPS3) provides a clear definition of Net dwelling density which makes it clear what is and is not included in that calculation.	see above
	* Sufficient flexibility should be provided within the policy to ensure acceptable forms of development can come forward based on a character study of the area without being unreasonably withheld.	See response above.	see above
	* Locations do not tally with the settlement hierarchy terminology in SS1, which will cause confusion - amend to Yeovil, Market Towns, Rural Centres and Rural Settlements.	See response above. Agreed that settlement terminology did not match, this was an editorial error.	see above
	*Density is too high, people need good internal and external space otherwise will be undesirable places to live.	See response above.	see above
	*Discussions with SSDC Climate Change Officer indicates that an Eco Town can work only by virtue of eliminating overshadowing of buildings, this would be impossible at 50 dph.	Not agreed. Solar energy is only one component of eco development and whilst it will be preferable to avoid overshadowing eco development could still be achieved even if there was some overshadowing.	see above
	*General densities of 40-50 dph are not attainable without a significant number of flats being included, the industry is building virtually no flats due to prospective purchasers difficulties in obtaining a mortgage .	Noted although high density development does not necessarily mean flats see study carried out as referred to above.	see above
	*Area East feel that a density of 30dph is more acceptable to rural areas.	See response above.	see above
	*Density should be the maximum that is aesthetic to the surroundings to minimise the need for Greenfield sites.	Noted and agreed	no change
	* Para 8.9 - Housing density of 40-50 dph is too high for Yeovil. 30-40 dph is more acceptable. Development should be of a high standard and it might be worth sacrificing more Greenfield land to achieve this.	See response above regarding studies undertaken to consider densities throughout the District.	see above

	*Government has indicated that it wishes to see a move back to family housing as opposed to flats. Not convinced that the average density of 50 dph in the Yeovil Eco-town is feasible or desirable - will result in cramped conditions. Although this will require more land the overall effect in terms of quality of living will be increased by making a more realistic assessment of density requirements. There was concern from house builders and local authorities when this level of density was proposed in the RSS.	See response above.	see above
	* Density guidance has been removed from PPS3. No evidence to substantiate this policy without evidence it is unsound.	See response above additional studies on densities has been carried out	see above
	* What does this mean? The numbers do not inform people of how packed housing will be.	See response above.	see above
	* Ensure that garden friendly trees (e.g. fruit trees) are planted in all new build gardens.	Not a Core Strategy issue. Cannot control tree type through policy.	No change
	* Welcome the intention to review density standards. 50dph or more is not acceptable on periphery developments/Key Sites. Recognition of densities in nearby villages should be a consideration and an attempt made to 'blend' in with these. A gradual increase in density towards the centre of town is seen as a better arrangement.	See response above regarding studies undertaken to consider densities throughout the District.	see above
	* Stop building at 22/acre to reduce tomorrows slums.	See response above.	see above
	* Original 30dph in PPG3 was based upon the sustainment of bus routes in large urban areas (see PPG3 Companion Guide). The work anticipates a continuous density along the route as would occur in Greater London. Original target of 40 dph was reduced to 30 dph in in 2006 (PPS3). Although it remains pertinent for conurbations, it was changing the nature of rural settlements, particularly encouraging a "doughnut" of high density development around a low density core with no bus service . Research shows that the specific range of transport uses varies with settlement size. Housing policy should respect this.	See response above.	see above

	<p>* Minimum density policy produces no additional benefit, is not evidence based, is poorly drafted and could cause irretrievable harm to key character areas. Policy will not apply at all to smaller sites where quantum effects are prevalent (majority of development in South Somerset over last 20 yrs would be exempt). Policy is self frustrating because it allows, where members wish to rely on it, the developer or officer can argue special circumstances and vice versa. If the policy is omitted, larger sites will be determined based upon their specific context. That is a far safer approach.</p>	See response above.	see above
	<p>* Commercial interest will always seek to deliver the best economic return so any artificial inflation of density beyond that will impact on viability. Generally accepted that higher density development gets a greater return. If the policy is included additional density will be produced on peripheral sites and transport demand is unlikely to be met in such locations by viable public transport. Densities and in excess of those found in the core of many settlements in South Somerset. Reference to housing density should be amended to refer to "net dwelling density."</p>	See response above.	see above
	<p>* If the Council genuinely want to see an increase in affordable housing it needs to insist on high densities rather than wasting land on rich incomers. Affordable housing is more likely to result if houses are simply built as places to live rather than somewhere grand enough to be worth moving the length of the country to buy. Apply the 50 dph to ALL new developments - especially in rural areas and leave the big old houses to those who can afford them.</p>	See response above.	see above
	<p>* Hope 30 dph in rural area is to be the minimum density as it will be near impossible to provide the private sector with homes costing less than £200K. Young people will be forced out the areas if they are to buy a home in which to raise a family. Need a diverse range of homes in villages.</p>	See response above.	see above

Previously Developed Land			
Policy HG3 The use of Previously Developed Land (PDL) for new housing development (paras 8.11 - 8.20)	* The low target for housing on previously developed land is unjustified and the policy should be reworded to reflect national policy (PPS3) which states 60%.	National Policy is to be removed but there will still be an expectation that the use of PDL will be maximised. The target of 30% was determined from past local monitoring figures and predicted future trends. The monitoring information used has been updated by a year and shows no significant changes to predicted trends.	No change
	*Strongly support policy but it needs to be supported by the continued supply of Greenfield land, therefore imperative that there are a range of urban extension site options - if the preferred option is therefore not viable other sites can therefore come forward.	For most settlements a direction of growth is the preferred option. The only specific sites identified are the Key Sites at Lufton and north of Thorne Lane, Yeovil and CLR site in Crewkerne which were carried forward from the South Somerset Local Plan and which are to be safeguarded as strategically significant. All proposed sites will be considered on their merits and against current planning constraints.	No change
	* Support policy HG3.	Noted.	No change
	* Unrealistic reliance on brownfield supply.	The target of 30% was determined from past local monitoring figures and predicted future trends. The monitoring information used has been updated by a year and shows no significant changes to predicted trends.	No change
	* Support the idea of maximising housing development on PDL but this should not be at the expense of having to provide high density development that is not characteristic of an area. Imposing significant obligations on landowners within the urban area is likely to deter the promotion of the development of Brownfield land (see Policies SS7 and SS8).	Agreed in relation to maximising PDL but not at the expense of design. Planning Obligations are subject to viability considerations.	No change
	* Suggested target of 30% is unsustainable and falls below national targets. 30% target is not good enough.	National Policy is to be removed but there will still be an expectation that the use of PDL will be maximised. The target of 30% was determined from past local monitoring figures and predicted future trends. The monitoring information used has been updated by a year and shows no significant changes to predicted trends.	No change

	* Probably being done because of gov pressure but to propose this amount of greenfield building is madness. (See comments under 7.66 to 7.69).	National Policy is to be removed but there will still be an expectation that the use of PDL will be maximised. The target of 30% was determined from past local monitoring figures and predicted future trends. The monitoring information used has been updated by a year and shows no significant changes to predicted trends.	No change
Affordable Housing			
Affordable Housing (paras 8.21 - 8.22)	No Comments Received	N/A	N/A
Definition of Affordable Housing			
Definition of Affordable Housing (para 8.23)	*Expand the definition to include opportunities for self sufficient, low impact smallholdings. They cost less to build and can make positive contribution to the community and economy of rural areas. Can be subject to Trust Provisions or Legal Agreements.	This is not possible as the District Council has no control over the national planning definition of affordable housing (set out in Annex B of PPS3, 2011 and proposed to be carried forward into the National Planning Policy Framework). However, saved South Somerset Local Plan Policy HG12 allows for low impact dwellings where they meet certain criteria and Planning Policy Statement 7: Sustainable Development in Rural Areas, (2004) allows for the provision of agricultural, forestry and other occupational dwellings in the countryside where justified.	No change.
	* There are a number of attempts to prejudice decisions by future authorities. Most obvious in the attempt to prevent houses built as affordable homes being sold at any time in the future at market prices. Whilst being laudable this will not work. Much better to seek mechanisms that allow the profit from property bought through sell off to be retained by the council, or other public body funding the original initiative, so that the product for sale can be recycled in a manner appropriate to the needs at the time.	Regarding the issue of retaining affordable housing for local people; on rural exception sites affordable housing can be retained for local people through the use of Section 106 Agreements . However, on non-rural exception sites, depending on the affordable housing product, it is normally accepted that a certain number of occupants of the intermediate affordable housing units (shared ownership) may staircase out i.e. buy 100% of the property this is because no one in South Somerset has the Right to Buy, however some residents do have a Preserved Right to Buy, this only applies to those who at the time of stock transfer became South Somerset Homes residents (now Yarlinton Homes) and have remained a tenant of a property/properties owned/managed by them since that time. Recycling income from sell off of affordable housing is an alternative way to secure future affordable housing.	No change.

Affordable Housing Need			
Affordable Housing Need (paras 8.24 - 8.25)	* The need for affordable housing is overstated in the context of a declining market. SHMA shows a demonstrable supply of smaller, cheaper units in Yeovil.	The Strategic Housing Market Assessment (SHMA) states that there is a net annual need for 659 new affordable homes in South Somerset.	No change.
Mix of Affordable Housing			
Mix of Affordable Housing (paras 8.26 - 8.27)	No Comments Received	N/A	N/A
Affordable Housing Policy Target			
Affordable Housing Policy Target (paras 8.28 - 8.30)	* Unclear what will happen if the 2013 viability assessment concludes that 35% is not viable - the updated viability assessment should include a forecast for the next 3 years which will allow the Council to consider if it needs to change its target.	The 35% target is based on the level of need and reasonable viability as summarised by the Strategic Housing Market Assessment. In order to address the issue of viability a Strategic Housing Land Viability Assessment (SHLVA) has been undertaken. The SHLVA identifies that when taking into account market conditions the maximum target justifiable on strategic viability grounds across the District generally is 30% (as at July 2008). The SHLVA Annex (May 2010) updates this original work and indicates that the target had reduced to 20% reflecting the worsening housing market. However, this work has been further superseded by the viability assessment carried in association with the Community Infrastructure Levy (CIL) work, this demonstrates that a CIL of £150 per sq m is viable at 35% affordable housing except in Chard (£100 per sqm plus 15% affordable housing) and Yeovil Urban extension (£32 per sq m & 35% affordable housing). It is the intention that future SHLVAs should be used to guide affordable housing provision negotiations and the evidence will be updated	No change. See Policy HG4.
		(approximately every 3 years) to allow for a flexible approach that takes account of market conditions and likely timescales. Draft Policy HG4 will requirement amendment to reflect this. The Council will continue to seek 35% affordable housing on the basis of need. What it settles for will depend on site economics at the time of application.	

Affordable Housing thresholds			
Affordable Housing thresholds (paras 8.31 - 8.32)	* Generally support the threshold of 6 but question whether there may be a case for higher thresholds in urban areas such as Yeovil and Chard where viability is more of an issue.	The threshold of 6 or more dwellings arises from the recommendations in the SHLVA Annex (May 2010). The Annex builds upon and draws from the original SHLVA. It assesses a further 8 small sites using the same methodology as the original study and updates the viability assessment for the original 6 South Somerset SHLVA sites by allowing for changes in price and cost levels since spring 2008. It is considered that this document provides the additional evidence required to justify a departure from the threshold of 10 recommended in the original SHMA particularly given the potential cumulative impact of the delivery of dwellings on smaller sites across the District as demonstrated by Figures 19-21 of the Draft Core Strategy. Given that larger settlements such as Yeovil and Chard are expected to deliver a significant level of growth over the plan period it would not be beneficial to set a lower threshold in those settlements and there is no evidence to support doing so. Where viability is an issue then the plan is clear that the Open Book approach can be used	No change.
	* Concerned that in current market conditions many viability assessments will be required and perhaps it would be better if officer time was focussed in achieving affordable housing on larger schemes. Council may want to delay the introduction of lower thresholds until market conditions improve.	It is considered that a departure from an approach that is evidence based, seeks to meet affordable housing need and allows for flexibility where justified should not be amended whilst market conditions are moveable.	No change.
Affordable Housing thresholds (para 8.33)	No Comments Received	N/A	N/A
Affordable Housing Provision			
Policy HG4 Provision of Affordable Housing (and paras 8.34 - 8.37)	* Support levels of affordable housing and recognition of impact on viability. There should be a mechanism to take this into account.	The Strategic Housing Land Viability Assessment (2009) and Annex (2010) provide evidence regarding what is considered to be viable at a certain time and the Open book approach is the mechanism to take viability into account as set out under Policies SS6-SS8.	No change.

	<p>* It is not clear on what basis the 35% affordable housing target has been derived - evidence from the SHMA suggests 30% (as at July 2008), and the viability update (April 2010) is 20%.</p>	<p>The SHMA states that on evidence of need and viability a target of 35% can be justified in the District (p.315). The levels of viability will fluctuate over the plan period (which runs until 2028) as the market rises and falls but need will continue to be there. It is highly unlikely that the need for 659 new affordable homes per year (identified in the Strategic Housing Market Assessment, 2009) will be met but by having the higher target in policy when viability does improve the higher level can be achieved. Regular updates of the SHLVA will be used to inform negotiations.</p>	<p>No change.</p>
	<p>* Support the notion that the affordable housing target should be reviewed every 3 years (para 8.30) as a pragmatic approach that provides some certainty, but it is not clear why a 35% target is advocated which would seem to be unviable in the vast majority of circumstances during the next 3 year period.</p>	<p>See response above.</p>	<p>No change.</p>
	<p>* Unrealistically high affordable housing targets should not be set, as this would place pressures on resource management if each and every development has to be run through the open book process. A more realistic requirement with the commitment to periodically review would be a more satisfactory approach.</p>	<p>See response above.</p>	<p>No change.</p>
	<p>* The references to viability are strongly supported, and it is acknowledged that the Council will take a pragmatic approach in all circumstances.</p>	<p>Support noted.</p>	<p>No change.</p>

	<p>* The notion that new homes will help meet the need for affordable housing is invalid as social housing only occurs in large developments, not a few houses here, and few more there. New houses would have to be provided for rent only to keep them affordable, by which you mean cheap. There should be a return to the old system of Council housing for those who cannot afford to buy. If you have cheap houses for sale, they will be sold for a profit.</p>	<p>Whilst the current threshold for the provision of affordable housing (includes social housing) is 15 dwellings or more it is proposed to lower that threshold to 6 of more dwellings (Draft Policy HG4) which means that a larger proportion of developments would be expected to provide affordable housing. In rural areas saved South Somerset Local Plan Policy HG9 currently allows for the provision of affordable housing to meet local needs, legal agreements are put in place to ensure that those homes remain affordable in perpetuity. South Somerset District Council no longer has a housing stock - this was transferred to Yarlinton Homes who like other Registered Providers build affordable housing for those who cannot afford to buy or rent housing on the open market. The majority of those homes do not go on to be sold on the open market.</p>	<p>No change.</p>
	<p>* The threshold of 6 dwellings is too low and will render many potential housing sites unviable for development, and is therefore contrary to PPS3 which requires Council's to maintain a 5 year supply of deliverable land sites that might be suitable for housing will not be available or achievable because they will be withheld and their development delayed.</p>	<p>The Strategic Housing Land Viability Assessment Annex, May 2010 demonstrates that sites of 6 dwellings or more are viable. The CIL Evidence Base demonstrates this viability. With regards to sites of less than 6 dwellings the Annex has been further superseded by the Small sites Affordable Housing Financial Contributions Economic Viability Appraisal (2012) which shows that in addition to the standard CIL payment a commuted sum equivalent to a 5% affordable housing on site provision in Yeovil and the Market Towns is viable and a 10% equivalent on site contribution in Rural Centres and Rural Settlements is viable (£20 per sq m and £40 per sq m respectively) . Where viability is in question the Open Book approach can be used to demonstrate that a reduced level of affordable housing might be justified. In accordance with PPS3 the South Somerset has a 5 year land supply and this will continue to be monitored.</p>	<p>No change.</p>
	<p>* Evidence from Aylesbury Vale DC demonstrates that provision of affordable housing represents a very large subsidy from land value to such an extent that this can cause significant viability problems. Even on large sites. This is particularly the case where proposals involve major off-site highway provision.</p>	<p>See response above.</p>	<p>No change.</p>

	<p>* Threshold - Proposed change from the adopted Local Plan is not based on sound evidence. The proposed threshold will impact on the delivery of small scale housing within urban areas. Small sites often have higher infrastructure costs as they do not benefit from economies of scale, needs further consideration. Also object to 0.1 hectares for all sites apart from Rural Centres and Settlements. Based on 30 dph this means a threshold of 3 dwellings is being applied. Propose that the threshold should be 20 dwellings or sites over 0.7 hectares in size.</p>	<p>See response above regarding the threshold (paras. 8.31 - 8.32). The SHLVA Annex (May 2010) suggests that the corresponding area equivalent based on a threshold of six dwellings should be 0.1 ha (based upon 60 dwellings per hectare (dph)). Draft Policy HG4 shows this being applied in the Yeovil Urban Extension, Yeovil and Market Towns but increases the area to 0.2 ha in Rural Centres and Rural Settlements, this is based on a net dwelling density of 30 dwellings per hectare. The density research paper presented to PMB suggests moving away from setting specific densities for specific settlement types instead opting for a development management led approach. The research paper findings show an average net density across the sample survey of approx. 28 dph, with the imminent demise of the RSS and the move away from very high density flatted development it is considered that an area based on 60 dph may be optimistic it is therefore suggested that a corresponding area of 0.2 ha across all settlements would be more appropriate.</p>	<p>Amend Draft Core Strategy Policy HG4 to show a corresponding area to 0.2 ha for all settlements, with the proviso that this may require amendment as a result of the outcome of the Infrastructure Delivery Plan (IDP).</p>
	<p>* The figure of 6 is ridiculously low. No developer or purchaser would want affordable housing in such a small development. Put the affordable housing all together.</p>	<p>See response above. Paragraph 8.37 of the Draft Core Strategy explains that in terms of developability, and for ease of management, affordable housing should be dispersed throughout a development site although clusters of affordable housing are acceptable in some circumstances and commuted sums where justified.</p>	<p>No change.</p>
	<p>* The Strategic Housing Market Assessment states that a threshold lower than 10 dwellings could only be justified with further robust evidence - there is no such evidence. Even a threshold of 10 would render many schemes unviable.</p>	<p>Further evidence has been produced to justify a threshold of lower than 10 dwellings in the form of the SHLVA Annex (May 2010) and the Small Sites Affordable Housing Financial Contributions Economic Viability Appraisal (2012). See response above.</p>	<p>No change.</p>
	<p>* Site viability is impacted by the design standards of affordable housing for an RSL, contributions to open space, education, transport and other infrastructure obligations. National policy sets an indicative threshold of 15 dwellings, which is appropriate for Yeovil, Market Towns, and Rural Centres. A level of 6 dwellings may be justifiable in the Rural Settlements.</p>	<p>Planning Policy Statement 3 (2011) does set a national indicative minimum of 15 dwellings it goes on to say "...Local Planning Authorities can set lower minimum thresholds, where viable and practicable, including in rural areas." The Strategic Housing Land Viability Assessment Annex, May 2010 demonstrates that sites of 6 dwellings or more are viable in all settlements. The CIL Evidence Base Report confirms this. The Draft National Planning Policy Framework (2011) removes that minimum site threshold giving more flexibility to local councils.</p>	<p>No change.</p>

	<p>* Need to ensure affordable housing has a covenant so they remain affordable indefinitely.</p>	<p>Regarding the issue of retaining affordable housing for local people; on rural exception sites affordable housing can be retained for local people through the use of Section 106 Agreements. However, on non-rural exception sites, depending on the affordable housing product, it is normally accepted that a certain number of occupants of the intermediate affordable housing units (shared ownership) may staircase out i.e. buy 100% of the property. No one in South Somerset has the Right to Buy however, some residents do have a Preserved Right to Buy this only applies to those who at the time of stock transfer became South Somerset Homes residents (now Yarlinton Homes) and have remained a tenant of a property/properties owned/managed by them since that time. Affordable housing can be saved by recycling funds from Preserved Right to Buy sales or other sales of affordable housing.</p>	<p>No change.</p>
	<p>*Affordability should be addressed through brownfield regeneration and windfall sites in rural areas where need is demonstrated.</p>	<p>It is agreed that brownfield opportunities for housing development (including affordable housing) should be taken where possible. Draft Policy SS2 allows for affordable housing development in rural settlements where there is an identified local need.</p>	<p>No change.</p>
	<p>*If provision of affordable housing isn't made with the proposed development, it should be refused.</p>	<p>Under the provisions of Draft Policy HG4 only developments of 6 or dwellings are required to provide affordable housing, evidence in the Strategic Housing Land Viability Assessment Annex, May 2010 shows that developments of less dwellings would not be viable with the provision of affordable housing on site. However, given that it seems unfair that a development of 6 dwellings should make a contribution to affordable housing provision but proposals for 1-5 dwellings should not, further viability assessment has been undertaken (Small Sites Affordable Housing Financial Contributions Economic Viability Appraisal, 2012) which builds upon the Annex (2010) this shows that a commuted sum equivalent to a 5% (£20 per sq m) on site contribution on sites in Yeovil and Market Towns and the equivalent of 10% (£40 per sq m) in Rural Centres and Rural Settlements is viable (plus £150 per sqm CIL - except Yeovil Urban Extension - £32 and Chard £100). Consequently Policy HG4 requires amendment to reflect this.</p>	<p>Amend Draft Core Strategy Policy HG4 to reflect the requirement on sites of 1-5 dwellings for a commuted sum equating to 5% on site affordable housing provision in Yeovil and 10% in Rural Centres and Rural Settlements (in addition to the standard CIL charge).</p>

	*Policy should prioritise local people/people working locally.	Affordable housing on Rural Exception Schemes is targeted to people with a very local need. Those on the Housing Register are stratified into bands using a points based system. Properties are bid for through the County-wide Choice Based Lettings System.	No change.
	*Difficult to predict what the level of need will be in 15 years.	The Strategic Housing Market Assessment (SHMA) will be updated over the plan period and this will provide future evidence of need.	No change.
	*Not clear if threshold kicks in when you build 6 or 7 houses.	The threshold applies to 6 or more dwellings i.e. if you are planning to build 6 or more dwellings you will be expected to make an affordable housing contribution.	No change.
	* Pleased to note that nil subsidy position has been used. Para 8.34 makes reference to min space standards required by HCA however on 29/11/10 Minister for Housing stated that for the meantime the HCA will continue to use existing standards. 'This will save an average increase in build costs of £8,000 per unit. In the long run, the standards that apply to private and public housing should be exactly the same. My ambition is to harmonise standards at the earliest opportunity - I just don't understand why all homes shouldn't be the same great standard.'	Given the Minister's comments it is considered that the Core Strategy should not only refer to the prevailing HCA standards but also make reference to any standards the Council may adopt in the future.	Amend paragraph 8.34 to refer to any standard subsequently adopted by South Somerset District Council at the end of the final sentence.
	* Concerned that in current market conditions many viability assessments will be required and perhaps it would be better if officer time was focussed in achieving affordable housing on larger schemes. Council may want to delay the introduction of lower thresholds until market conditions improve.	It is considered that a departure from an approach that is evidence based, seeks to meet affordable housing need and allows for flexibility where justified should not be amended for purely bureaucratic reasons.	No change.
	* Would like to see greater emphasis on provision of affordable housing for 1st time buyers particularly in rural areas.	Paragraph 8.34 of the Draft Core Strategy identifies that evidence in the Strategic Housing Market Assessment shows that 75% of affordable housing required is for 1-2 bedrooms (more likely to be required by first time buyers than families) and this evidence will be used to inform provision. Allocation of affordable housing to prospective tenants is not a matter for the Core Strategy.	No change.

Market Housing			
Dwelling Size and Type for Market Housing			
Dwelling Size and Type for Market Housing (paras 8.38 - 8.40)	* Is it proposed that this section is re-written every few yrs. If not then surely the Core Strategy should refer to a DPD or SHMA for the narrative?	It is not the intention that this section be re-written every few years. Additional detail was included in the Draft Core Strategy document by way of context setting but it is agreed that the Proposed Submission Plan should refer to the evidence base rather than including evidence that will date over the plan period.	Amend paragraphs 8.38 to 8.40 by referring the reader to the narrative in the Strategic Housing Market Assessment or successor documents.
Likely Profile of Household Types requiring Market Housing			
Policy HG5 Achieving a Mix of Market Housing (and paras 8.41 - 8.42)	* This policy is broadly supported, but the Council need to be careful to balance the requirements of this policy with Policy HG2 regarding density standards - density standards should not be set so high that a suitable mix of housing which responds to local need and demand cannot be provided.	It is proposed to delete Draft Policy HG2 and amend Policy EQ2: Design, by the addition of a criterion and relevant supporting text to address making the most efficient use of land whilst taking into account the surrounding spaces and landscape and give consideration to the inclusion of some of the PPS3 density criteria (paragraph 46). This approach will allow flexibility to provide a mix of housing to meet local need.	See Policies HG2 and EQ2
	*Affordable housing should be designed and built sympathetically and in keeping with local areas.	Agreed this is reflected in Draft Policy EQ2: Design.	No change.
	*A ratio of 20-25% of houses (in a large development) must be small, probably semi-detached starter homes for young couples.	The mix of housing will be guided by the evidence in the SHMA. This shows that demand is greatest for 2 and 3 bedroom detached or semi-detached homes. 30% of those requiring market housing are couples with no children.	No change.
	*Support policy, hope to see lifetime homes as being the most flexible housing type alongside all the other factors.	Support noted. Paragraph 8.43 of the Draft Core Strategy addresses Lifetime Homes standards which form part of the Government's Code for Sustainable Homes (CSH).	No change.

	<p>* Policy should state that specific house types will only be encouraged on small sites where practical and desirable.</p>	<p>Draft Policy HG5 is clear that on small sites housing types and sizes should be provided that, taken within the context of the existing surrounding dwellings, contribute to the provision of sustainable balanced communities. Development on smaller sites is likely to be within existing Development Areas and sites will be surrounded by a variety of existing housing options the wording of the Draft Policy provides the flexibility to consider each application on it's own merits within the local context and it is considered that no change is required.</p>	<p>No change.</p>
	<p>* Support the building of new homes but these must not all be luxury homes sold at the highest price possible. A good proportion of homes should be affordable or lower cost market housing. If this does not happen homes will go to those who currently live outside of the area. South West has a low pay economy and we need homes for local people.</p>	<p>Draft Policy HG4 expects 35% of new homes on qualifying sites (6 dwellings or more) to be affordable. The Strategic Housing Market Assessment provides the evidence to require a mix of housing types which would include lower cost market housing.</p>	<p>No change.</p>

Lifetime Homes and Empty Properties			
Lifetime Homes			
Lifetime Homes (para 8.43)	* Council may want to consider a more specific policy on the lifetime Homes standard. Considered that the standards are reasonable but the parking requirements can be a very intensive use of land.	Lifetime Homes standards can be encouraged however in terms of viability and deliverability it is not considered to be appropriate to require all new homes to be built to Lifetime Home standards. The Lifetime Homes Standard is generally higher than that required by Part M of the Building Regulations (which deals with accessibility), although some elements of Part M are equal to the Lifetime Homes requirements or need relatively minor changes to comply. It is however considered that given the ageing population of South Somerset there would be some benefit in having a policy which specifically addresses the provision of housing for the elderly people.	Add the following additional supporting text to paragraph 8.43 : after "Challenging" insert in order to address this need specialist housing options will be required this could include care homes, Extra Care housing and Continuing Care Retirement Communities. Add a new Policy to allow proposals for provision of Care Homes and other specialist housing accommodation that meets a need and where it is consistent with the Spatial Settlement Strategy. Development in the countryside will be exceptional and will require clear justification.
	* Suggest that a specific policy is required to address the needs of elderly people in the district. Suggested policy wording supplied.	See response above.	As above. Add a new Policy to allow proposals for provision of Care Homes and other specialist housing accommodation that meets a need and where it is consistent with the Spatial Settlement Strategy. Development in the countryside will be exceptional and will require clear justification.

	* Reference is to a CLG progress paper not the lifetime homes standard tests at http://www.lifetimehomes.org.uk/pages/revised-design-criteria.html . Should be a reference to Lifetime Neighbourhoods standard (yet to be published) as the intent to allow mobility within the locality to free up homes rather than blocking them with single elderly.	Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society (CLG, 2008) states the following "We will ensure therefore that all public housing will be built to Lifetime homes standards by 2011. Our aspiration is that all new housing will be built to these standards by 2013. Lifetime Homes Standards will be made a mandatory part of the Code for Sustainable homes and we will work to support industry to encourage take-up on a voluntary basis over the next few years. We will review take-up in 2010, with a view to bringing forward regulation in 2013" "Lifetime Homes are an exemplar of good design in themselves, but our wider ambition is to promote inclusive design both inside the home and across the neighbourhood." It is not clear if the current Government proposes to take this forward and reference to Lifetime Homes would have to be amended.	No change.
	* Development Management currently assess all major housing applications against Building for Life framework. Why isn't this mandatory with a target score for approval.	Given the recent publication of the Draft National Planning Policy Framework is considered that it would not be appropriate to introduce a mandatory scoring system at the current time, however as things become clearer there is no reason why this issue could not be reconsidered in the future. This is not a Core Strategy issue.	No change.
Empty Properties			
Empty Properties (para 8.44)	* Unless this is to be constantly updated would it be better not to make specific grant offers in the text?	Agreed that in terms of future proofing the Core Strategy it would be more appropriate to delete the reference to the specific grant sum.	Amend paragraph 8.44 by deleting "... Of up to £11,000....."
Gypsies, Travellers and Travelling Showpeople			
Policy HG6 Gypsies, Travellers and Travelling Showpeople (and paras 8.45 - 8.52)	* Support policy HG6 but consider policy should have regard to transport.	Support noted. It is considered that the policy does have regard to transport in the criteria relating to relationship with existing schools and community facilities, access and parking and servicing.	No change.
	*Support HG6.	Support noted.	No change.
	* Welcome reference to landscape character.	Support noted.	No change.

	<p>* Only protects land within designated sites and does not take into account the fact that effects can occur outside designated site boundaries that can affect conservation objectives of Natura 2000 sites. Therefore add: 'land outside a designated site which nonetheless ecologically supports the conservation objectives of a Natura 2000 site unless it can be proven that there would be no significant effect.'</p>	<p>In order to address this point it is considered that the second criteria can be amended by removing the wording "Land within.."</p>	<p>Amend second criteria point of Policy HG6 to read: Development should not result in an adverse impact on internationally and nationally recognised designations (for example Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty;</p>
	<p>* Policy does not include the policy wording from the findings of the HRA on Bracket's Coppice SAC and therefore the Core Strategy cannot be considered Habitats Regulations compliant. Policy only provides for land within designated sites and does not take account of ecological functioning supporting conservation objectives of Natura 2000 sites (suggested additional text supplied).</p>	<p>See response above.</p>	<p>see above</p>
	<p>* Policy criteria are generally acceptable with the following exceptions: 1. Second criteria should recognise that land within an AONB can be acceptable as long as the objectives of the designation will not be compromised (Circular 1/2006 para 52). 2. Third criterion - any form of development can have a significant adverse impact by reason of the fact that it is development. Balance here is not appropriate and could open the door to NIMBY objections based on racial prejudice. The word 'unacceptable' should replace 'significant' to ensure balance.</p>	<p>See response above regarding the second criteria. Whilst the comment regarding the third criteria is noted it is considered that the word "significant" provides a greater degree of protection against the type of objections referred to as it implies that the arguments against the proposal have to demonstrate a degree of adverse impact whereas the word "unacceptable" is considered to be weaker as the pure fact that development would be taking place could be argued to be "unacceptable".</p>	<p>see above</p>

	<p>*Environment Agency - location for new Gypsy, Traveller and Travelling Showpeople should not occur in the identified flood risk areas, especially temporary accommodation - the wording in this policy should be stronger, reflecting PPS25.</p>	<p>It is considered that the current wording "unacceptable flood risk" adequately reflects the intentions of Planning Policy Statement 25: Development and Flood Risk (PPS25). Whilst PPS25 remains in place its requirements will be met and the Draft National Planning Policy Framework (2011) proposes the retention of the Sequential and Exception Tests. Draft Planning Policy Statement: Planning for Traveller Sites (2011) states that sites should not be located in areas of high flood risk including functional floodplains. Further policy guidance may be incorporated into the NPPF and any change as a result will need to be accommodated</p>	<p>No change</p>
	<p>*The views of the settled community need to be given greater weight in deciding location of proposed sites.</p>	<p>The criteria within Draft Policy HG6 are intended to guide the location of Gypsy, Traveller and Travelling Showpeople sites. The Draft Planning Policy Statement: Planning for Traveller Sites (2011) makes it clear that local planning authorities should "pay particular attention to early and effective community engagement with both settled and traveller communities" (Policy A 6.(a)). Should a site allocations DPD be produced after the core strategy consultation with the settled community and travelling communities would be undertaken and taken into account and the same will occur with any planning application received.</p>	<p>No change.</p>
	<p>*MOD wish to be consulted on any developments that occur in aerodrome safeguarding zones.</p>	<p>This would occur as part of the Development Management process when any planning application is received. Should a site allocation DPD be produced any existing constraints would be identified as part of the site identification process.</p>	<p>No change.</p>
	<p>*Government has confirmed that there is no national requirement in respect of the provision of Gypsy and Traveller sites, and that local authorities should deal with the matter. In light of this, it is unsound to proceed with the policy. HG6 should be deleted.</p>	<p>At the time of writing this Circular 01/2006 is still in place and Draft Policy HG6 is in accordance with that circular. Draft Planning Policy Statement: Planning for Traveller Sites (2011) expects local planning authorities to have a 5 year deliverable supply of Traveller sites where there is an identified need (the word traveller is defined as including Gypsies and Travellers). They are also expected to identify sites within their Development Plan therefore it will still be appropriate to retain Policy HG6. There is likely to be further amendments to this within the NPPF</p>	<p>No change</p>

	* Section is based on Circular 01/2006. Circular has been suspended/revoked. Councils no longer need to provide special treatment for Gypsies and Travellers regarding the allocation of housing sites. Travellers should not be provided with special arrangements or access to land that is denied to the settled community.	See response above.	No change.
	*Abbey Manor Group opposed to providing any G&T sites within the urban extension 1) fundamentally incompatible with the high quality integrated development 2)Not a legitimate burden under Circular 05/2005 and CIL Regulation 122(2) to place on developers. HG6 should be deleted.	See response above. Comments noted but the policy does not refer to proposals to include such sites within the urban extension.	No change.
	* Note that no numerical target for the provision for Gypsies and Traveller is included - any lack of provision on South Somerset could have a knock on effect in Dorset. DCC would like to opportunity to comment on any figures to be included in the final document.	The Somerset Gypsy and Traveller Accommodation Assessment (Final edit, 2011) identifies a need for 18 residential pitches between 2010 and 2020 (10 between 2010 and 2015 and 8 between 2015 and 2020) and 10 transit pitches. These figures will be inserted into the Proposed Submission Plan which will be consulted on therefore there will be an opportunity to comment.	Amend Gypsies Travellers and Travelling Showpeople section to include the figures for the residential pitch and transit pitch requirement identified for South Somerset in the Somerset Gypsy and Traveller Accommodation Assessment (Final edit, 2011)
	* Concerned about the emphasis given to the travelling community - what do they contribute to society?	National guidance expects the accommodation needs of all members of society to be provided for.	No change.
	* GTAA October 2010 identifies a need for 18 pitches (2010-2020) and 10 transit pitches. Council is relying on aspiration to encourage private applications and identifications of public land to accommodate any shortfall whilst admirable this provides no certainty for the travelling community. Circular 01/2006 is still in place and following the recent High Court Judgement so is the RSS, therefore there remains a requirement for local authorities to make allocations in a suitable DPD. An allocations DPD will be the surest way of ensuring provision and there is nothing to stop private applications coming forward in the meantime. Failure to take such action could render the Core Strategy unsound. No mention is made of how transit provision will be met.	Following the completion of the Core Strategy consideration will be given to the production of a site allocations DPD, this will include meeting the need for transit as well as residential site provision. It is considered that the criteria within Policy HG6 can be applied to the location of transit sites . There is no requirement to allocate sites within the Core Strategy. Circular 01/2006, paragraph 31 states "The core strategy should set the criteria for the location of gypsy and travellers sites which will be used to guide the allocations of sites in the relevant DPD."	No change.

Replacement dwellings and extensions in the countryside			
Policy HG7 Replacement dwellings in the countryside (and paras 8.53 - 8.56)	* Misuse of the word 'scale' in first bullet point - amend to 'size'.	Noted	Amend policy
	* Welcome reference to landscape character.	Noted	No change
	*This is a very important policy, and with the restrictive nature of Policy SS2 this policy will be put under great pressure for growth. The heritage and conservation issues should be strengthened.	Heritage and conservation aspects would be supported by policies EQ2	No change
Agricultural, forestry and other occupational dwellings in the countryside			
Policy HG8 Housing for Agricultural and related workers and Policy HG9 Removal of Agricultural and other occupancy conditions (and paras 8.57 - 8.62)	* Re: final bullet point of HG8, add reference to minimising the impact of the new dwelling upon local landscape character and visual amenity in addition to siting, and ensure no adverse impact upon AONBs.	Noted	Amend wording
	* No reference to the historic environment. PPS5 Policy HE3 (ii) sets out the contribution the historic environment can make to economic vitality and sustainable communities and "its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development".	Noted	No change
	* The commentary should include that a temporary permission may be granted if the case is substantial but not fully proven but that no further extension is possible should the case remain unproven (hilltop).	This is already detailed in Annex A of PPS7 and if included would be a duplication of policy. Consider potential review with the proposed replacement of the PPS's with NPPF.	No change

Economic Prosperity			
Economic Prosperity (paras 9.1 – 9.15)	*There is limited reference to the Economic Development Strategy as it has yet to be produced, the Core Strategy should follow the ED Strategy not the other way round.	Agree that the Core Strategy should be the spatial vision of the Economic Development Strategy, however, given that the Economic Development Strategy has yet to be produced by the District Council, this cannot be the case. Having said that, the Core Strategy's approach to facilitating economic prosperity reflects the District Council's economic development aspirations, as cited in many documents including the Sustainable Community Strategy, and the policies have been produced through collaborative working with the Council's Economic Development officers and have had regard to the Somerset Economic Strategy and to the South Somerset and Yeovil studies by Ekosgen.	No Change.
	*The SSDC Corporate Plan 2009-2012 contains some excellent economic development concepts, (improvement of skills and creation of high value jobs) - the Core Strategy should pick up on these themes in a better way. * Chapter needs to address the following list of points (see 1252193)	Noted, currently there is no reference to the Corporate Plan which clearly sets out how the Core Strategy will assist in the development of a thriving economy. Agree that the themes identified in the Corporate Plan should be carried forward more explicitly. The Corporate Plan is in the process of being renewed.	Amend the supporting text to illustrate more clearly the role of the Core Strategy in achieving a 'thriving economy' in South Somerset.
	*The date of the Sustainable Community Strategy should be included.	Agree it would be useful to include the date of the Sustainable Community Strategy to which the Core Strategy refers, as this will be revised over time.	Amend wording in Core Strategy to include the date of the Sustainable Community Strategy.
	*Section 9. Economic Prosperity - Historic environment again not referenced. PPS5 Policy HE3(ii) sets out the contribution the historic environment can make to economic vitality and sustainable communities and "its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development".	A well maintained, good quality historic environment is important to the economic vitality of South Somerset, however the protection and management of that environment is dealt with through general design policy EQ2: Design, and therefore does not warrant a specific policy in the Economic Prosperity chapter. The issue of the historic environment and its protection and management will be further explored if necessary in light of any revision of national planning policy. Suggest the supporting text is amended to note the economic benefits of a well maintained, high quality natural and built environment.	Amend supporting text to note the economic benefits of a well maintained, high quality natural and built environment.

	<p>*DTZ's study "The Demand and Supply of Employment Land, Sites and Premises in South West England" (January 2007) concludes that a significant number of projected jobs will be in non-B uses, it will be reasonable to expect that some of these activities will locate in employment sites - policy needs to be flexible and recognise this.</p>	<p>The Baker report "Housing Requirement for South Somerset and Yeovil" (January 2011) confirms that approximately 66% of the District's jobs will be in B Use Class activities with 34% being in non-B Use class activities to 2028. Housing and Employment Topic Paper as presented to Project Management Board accepts that jobs growth will be in 'B' uses and non 'B' uses and explains that the Development Management process will guide the location of non-B Use Class activities through the application of PPS4 and District-wide policies. Draft Policy EP3: Safeguarding Employment Land allows traditional B Use class sites and premises to be redeveloped for alternative uses in a sequential manner (non B Use job generating uses firstly) where it can be demonstrated that the sites and premises are no longer required for B uses (following marketing etc) and the redevelopment would not significantly reduce the range and type of premises available to the market. It is considered that this Policy introduces the flexibility the respondent suggests, whilst still affording protection to B Use sites and premises.</p>	<p>Change Policy SS5 to include job totals and identify both 'B' use and non 'B', Use jobs for settlements.</p>
	<p>*4-6% of jobs are tourism-related not 4% in tourism. Tourism related employment includes hotels, camp sites, restaurants, bars, travel agencies, libraries, recreational activities & sporting activities. These would continue to grow without promotion due to use be local residents. Para 9.10 confuses the situation and should be deleted.</p>	<p>The Value of Tourism' 2008 produced by South West Tourism identifies that 5% of employment is supported by tourism, equating to 2,767 full time jobs. Disagree that paragraph 9.10 is confusing, it merely sets out the positive stance towards appropriate tourist-related activities. .</p>	<p>Revise section removing unnecessary explanatory text and revise reference to tourist related jobs to reflect 'The Value of Tourism'.</p>
	<p>*Farming seems to have been forgotten in the plan, yet it is very important to the District.</p>	<p>Paragraph 9.9 mentions agriculture and its importance to the economy and Policies EP9, HG8 and HG9 recognise the planning-related issues associated with agricultural development. These references are sufficient.</p>	<p>No Change.</p>

	*Goals identified should be related to specific places and should feature in those sections rather than here.	As it stands the individual settlement statements in Chapter 6: Market Towns - Vision & Proposals and Chapter 7: Rural Centres - Vision & Proposals identify the amount of employment land needed in each settlement, this is the only goal in the draft Core Strategy in terms of economic activity. It is suggested that a job target is also included and this will feature in both Policy SS5 and in the relevant sections in Chapter 6 & 7.	Amend wording of Policy SS5 and its supporting text and the relevant sections in Chapter 6 & 7 to include a job target for individual settlements (Rural Centres & Rural Settlements job figure will be combined as the small numbers involved make accurate projections difficult) and an overall floorspace target for the District.
	* The use of metric, particularly in terms of employment is inconsistent. Assume references to employees are an editorial issue. Would like clarification over how floor space will be measured (gross/net, internal/external and whether lost floorspace is being taken account of.	Hectares are the commonly recognised unit of measurement for planning, hence their use throughout the Core Strategy. It is suggested that Policy SS5 be revised to include a District-wide total jobs and floorspace target (likely to be generated from the hectares identified), and the floorspace would be in sq metres, both changes should make the employment figures more understandable. Lost floorspace has already been taken account in the overall calculation of 'need. through the South Somerset Employment Land Review.	Amend supporting text of Policy SS5 to clarify the figures - net or gross and explain how the loss of land has been taken into account in the overall identification of District-wide need for employment land.
Strategic Employment Sites			
Strategic Employment Sites (paras 9.16 - 9.18)	No Comments Received	N/A	N/A
Yeovil			
Yeovil (paras 9.19 - 9.20)	* The development of Lufton is likely to effect populations of common dormouse and horseshoe bats - need to demonstrate how these European Protected Species are maintained.	Ecological issues such as these will be dealt with through the planning application which has been submitted to the District Council. There are Saved Local Plan policies and International legislation to protect these species, this is not a Core Strategy issue.	No Change.
Crewkerne			
Crewkerne (para 9.21)	No Comments Received	N/A	N/A
Iminster			
Iminster (para 9.22)	No Comments Received	N/A	N/A

Yeovil Urban Extension			
Policy EP1 Strategic Employment Sites (and paras 9.23 - 9.24)	* A definition of the principles behind the term 'safeguarded' should be provided and this should include the need to consider adverse implications arising from nearby residential development.	The term safeguarded is defined in para 9.29 in that it states that maintenance of existing supply and protection of overall availability and distribution of employment land is a goal. The Development Management process will need to be mindful of adjoining land uses and the implications of developing residential development in close proximity to employment uses without one jeopardising the other.	No Change.
	*Ilminster Town Council will only support this allocation (without the need for further allocations) if the Environment Agency confirm that all the land is 'fit for purpose'.	There is sufficient land in Ilminster and no identified need for additional employment land. The strategic sites are coming forward and negotiations between Development Management officers and Environment Agency are confirming that mitigation measures will resolve issues. There are constraints on part of the allocated sites (pipelines) however, this does not warrant additional employment land in Ilminster.	No Change.
	* Consider that employment land at Cartgate picnic area/roundabout should still be under consideration due to its accessibility to the strategic highway. An 'out of town' employment allocation was provided at Solstice Park in Wiltshire where the Highways Agency contributed huge amounts of money towards alterations to the highway infrastructure.	There is no identified need for additional employment land in this location. Solstice Park is adjacent the town of Amesbury.	No Change.
Offices			
Policy EP2 Office Development (and paras 9.25 - 9.27)	*Support.	Support noted.	No Change.
	*There should be a narrative about the recent out-migration of offices from the Town Centre (SSDC, Tax Office) and the premises lying empty to justify the policy. It is only relevant to Yeovil and Chard.	Noted and agree, the Ekosgen work for the District Council recognises this as an issue in Yeovil. The supporting text should be amended to justify and set context for the policy. Please note, the National Planning Policy Framework removes offices from Town Centre uses to which the sequential test applies (PPS4 defines offices as Town Centre uses) therefore to retain this policy need local evidence and justification, the Ekosgen work may be enough, but may only be able to apply to settlements where there is the evidence if the NPPF position remains the same. Will need to monitor office space delivery as part of ELR.	Amend text to note the out-migration of offices as justification for the 'Office Development' Policy EP2 in the Draft Core Strategy.

	* (3) - SCC do not feel able to support this as it implies the acceptability of certain un-sustainable locations. Point about out of town sites relevant within the hierarchy proposed. An amendment to allow small scale offices to a certain threshold to support rural enterprise may be more acceptable in certain circumstances.	Noted and agree, revise policy to remove the 3rd bullet "Other out of centre sites".	Amend Policy EP2 to remove bullet "Other out of centre sites".
	* Important to note that all sites will have to mitigate their own transport impacts. SCC would be highly unlikely to support out of town sites with poor sustainable travel options as this would necessitate car use.	Noted and agree, revise policy to remove the 3rd bullet "Other out of centre sites".	Amend Policy EP2 to remove bullet "Other out of centre sites".
	* Paragraph 9.27 - Assertion that locating out-of-centre sites next to established business parks/industrial estates will provide the opportunity to maximise use of public transport is questionable as some existing estates do not have public transport services of any note e.g. Brympton Way or present any desirable transport characteristics. Starting from a blank sheet in a new location could yield better results in certain circumstances.	Disagree, it is more practical to achieve a critical mass from an employment site located adjacent to existing employment sites than a new 'stand alone' employment development. (i.e. the number of people from a combination of employment sites is likely to be greater than a single site). Following sequential test, preference to locate new office development in out of town sites next to other employment uses should be retained if not proposed in town centre.	No Change.
	* Term "good access "is somewhat ambiguous. May be helpful to specify a particular set of standards here such as BREEAM.	"Guidelines for Planning for Public Transport in Developments" (by then Institute of Highways and Transportation, 1999) identifies that in residential areas bus stops should ideally be placed every 300-400 metres, which would constitute good access, this figure is flexible. This standard is used as a base for employment areas also, and therefore there is no need to use BREEAM standards, but a reference in the supporting text might be useful for clarity.	Amend supporting text to make reference to the need to locate bus stops at distances of approximately 300-400 metres apart.
	* It would be a pity to build new office accommodation in a conservation area.	Conservation Areas are protected under Policy EQ2 and other national legislation (PPS5). The fact that an area is designated a Conservation Area does not mean we should preclude office development if appropriate.	No Change.
Safeguarding Employment Land			
Policy EP3 Safeguarding Employment Land (and paras 9.28 - 9.36)	*Support.	Support noted.	No Change.

	*There has been a 10% loss of employment land in the last 4 years alone, policy needs to be strengthened.	The draft NPPF recommends that local authorities do not safeguard employment land, however as stated, there has been a significant loss of employment land in recent years, therefore to prevent the further loss and subsequent replacement with Greenfield sites, Policy EP3, which is aimed at safeguarding land, should be strengthened from the previous South Somerset Local Plan Policy.	Amend Policy EP3 to strengthen the protection of employment land.
	* Should be considered important not to jeopardise development potential by allowing noise sensitive development nearby. If residential development occurred before employment dev a PPG24 assessment will not identify the need for protection from noise, and complaints may arise. If residents complaints are upheld using BS4142 assessment methods, then actions may arise that restrict development in these areas. This consideration may be behind the comment in 9.31.	The respondent is correct, employment development in close proximity to residential development can result in 'bad neighbour' issues depending on the nature of the employment use. Whilst Policy EP3 allows the opportunity to resolve that issue by allowing alternative uses in certain circumstances, the primary purpose of EP3 is to protect and retain existing employment land because these sites and premises are a valuable resource.	No Change.
	* Policy seems to deal with redevelopment of employment land rather than safeguarding and should be renamed-accordingly.	The emphasis of the Policy is on safeguarding employment land, changing the name would suggest greater emphasis on redevelopment which is not the purpose of the Policy.	No Change.
	* Understand the need to protect best quality employment land but redevelopment of worse quality employment land can play an important part in housing supply and reduce the loss of Greenfield land.	The Policy allows the residential redevelopment if the land is not suitable for alternative uses.	No Change.
	* An onerous policy which prevents or seriously delays the redevelopment of poor quality employment sites can have a detrimental impact on the amenity of an area by creating an eyesore and creating a magnet for anti social behaviour.	Disagree, the Policy includes a requirement to market up to a maximum of 18 months, if the site is not suitable for B uses and this is demonstrated through failed marketing (over an 18 month period), redevelopment to an alternative use is then acceptable. This Policy and the length of marketing is required, as employment sites have a lower value than some alternative uses, and are therefore under pressure to change their use.	No Change to Policy (but amend "Commercial Marketing of Property in Relation to Planning and Listed Building Applications" document to reflect 18 month maximum).
	* Concern on how employment is defined. Is it B1, B2 & B8 or some wider definition? Would question the use of a blanket employment floor space threshold when there can be major differences in travel demand between employment classes. Offices would generate more travel demand than storage or warehousing.	Employment is defined as B1, B2 and B8 of the Use Classes Order. Accepted that offices have a higher employment density ratio, hence Policy EP2 which seeks to direct offices to Town Centre locations where there are more opportunities to use sustainable modes of travel and support the vitality and viability of our town centres.	No Change.

	* Requirements for a change of use are too onerous. Sequence of alternative uses could be open to misinterpretation and used to frustrate redevelopment. Second use to be considered before a mixed use development is a 100% affordable housing scheme, this could be used alongside a community use.	The change of use requirements are seeking to achieve an economic development (job generating use) prior to residential. The Coalition Government have suggested through their consultation on the General Permitted Development Order (GDPO) that they will allow the change of use of employment land to residential without planning permission, so there is a need to be mindful of the outcomes of this consultation. 100% Affordable Housing schemes would be supported, but in practice would unlikely to be viable, in any case 35% affordable housing would be sought on any residential development therefore it does not need to be included specifically in the Policy.	No Change.
	* Requirement for "significant environmental improvements or enhancements of the character area" is open to misinterpretation. Quality and design of the scheme should be left to policies on design and layout.	Noted, but reference to Policy EQ2 will ensure high quality design.	Cross reference the principles of Policy EQ2: Design in supporting text.
	* Following text could be added as an additional point under 'Changes of use will not be permitted unless' There is good existing access to sustainable transport or provision is made as part of the development.	Policy TA3:Transport Impact of New Development requires all new development to address its own transport implications to maximise potential for sustainable development. Do not need to amend Policy as suggested as the Core Strategy Policies should be read as a whole.	No Change.
	* MOD would like text added to Economic Prosperity chapter relating to future use of land and buildings at RNAS Yeovilton and other MOD holdings (suggested additional text supplied).	Agree that a reference to MOD land at Yeovilton could be more specific, but disagree with the level of detail suggested which includes a specific policy for the redevelopment of MOD land at Yeovilton to alternative uses, this can be dealt with under the Development Management process.	Amend supporting text to refer to Yeovilton and its role to the economy of South Somerset.
	* 18 months is too long for a marketing campaign. 12 months is more appropriate. A number of other authorities use 6 months. Phrase - 'or as agreed with LPA' should be included. Judgement and common sense is lost.	18 months maximum is considered as a suitable time period to adequately assess whether the site and premises have economic/commercial potential.	No Change.
	* Para 9.32 - robust evidence must be provided to substantiate any change of use.	Support noted.	No Change.
	* If it becomes necessary to resort to allocation of Greenfield sites for employment development this land should not be reallocated for other uses such as housing and sports zones. Planning Inspector recommendations should be adhered to . Failure to do this brings the planning process into disrepute.	Agree with the comment - the reuse of allocated employment land to alternative uses would not be supported from a planning policy. The situation may change if the Coalition Government make their suggested changes to the GDPO, but at time of writing, no decision has been made.	No Change.

Delivering Employment Land in the Countryside			
Delivering Employment Land in the Countryside (paras 9.37 - 9.38)	No Comments Received	N/A	N/A
Small-scale Economic Development in the Countryside			
Small-scale Economic Development in the Countryside (paras 9.39 - 9.40)	No Comments Received	N/A	N/A
Re-use and Conversion of Buildings in the Countryside			
Policy EP4 Conversion or Re-use of Buildings in the Countryside (and paras 9.41 - 9.48)	*Make clear that EP3 has to be followed before EP4.	Policy EP3 and EP4 contradict each other. EP4 introduces an alternative approach to EP3 in rural areas. Policy EP3 deals with safeguarding employment land and this approach should apply in all areas, including rural areas, therefore suggest revising EP4 to reflect this.	Revise EP4 so that it does not contradict EP3 and explains the criteria required to be satisfied for residential re-use of buildings in the countryside.
	*Policy EC12 of PPS4 supports economic development as the preferred re-use in 'usual' circumstances and recognises that residential conversions may be more appropriate in certain locations and for some types of buildings - therefore residential re-use (where clearly the most appropriate use) should be permitted without the need for marketing.	Disagree, Policy EC12.1 states that local planning authorities should take into account the impact on the supply of employment sites and premises and the sustainability of the area when considering planning applications involving the loss of economic activity. The marketing of a site is a useful tool to determine the 'value' of an employment site to a rural area in economic terms, prior to any residential re-use. As previously stated employment land and premises are vulnerable to pressure for change of use, because their value is lower than alternative uses, and therefore ensuring they are not lost without evidence is crucial.	No Change.
	*Would be more helpful if policy set out criteria for all uses not just residential - criteria should apply across the board.	PPS4 is clear that prior to residential re-use an economic development use should be sought. Guidance is given in PPS4 and Core Strategy Policy EP3. The guidance for residential re-use is more vague, and given that residential uses in the countryside should be strictly controlled it is felt that a stand alone policy dealing with this issue is required.	No Change.

	*Derelict ex farm sites and brownfield sites like coal yards should be encouraged to be developed for business uses, as long as they are sustainable business uses and will maintain and restore the quality of the environment.	PPS4 is supportive of the re-use of existing buildings in the countryside for economic development, it is however clear, that economic development should be strictly controlled in the open countryside away from existing settlements. Sites need to be appropriately located (particularly adjacent or closely related to settlements) and the scale not out of context with the countryside location. There is sufficient national and local guidance (Policy SS2) on this issue and Policy EP4 does not need to be amended further to address this matter.	No Change.
	*Greater concern is the need for buildings to be 'in a sustainable location for the land use proposed' in order for re-use to be secured. Firstly there is no definition of sustainable location.	PPS4 defines a sustainable location in the context of the re-use of buildings in the countryside as a location not in the open countryside and preferably adjacent to, or closely related to existing settlements. The number of vehicle movements will be considered but it is not the over-arching concern of this Policy, as it is accepted that there will be vehicle movements given the rural nature of the District. It is suggested that the supporting text to Policy EP4 be amended to explain the term 'sustainable location' in greater detail.	Amend supporting text to explain the term and context of 'sustainable location'.
	Does the last bullet point refer to sustainable location in terms of vehicle movement?	See response above.	Amend supporting text to explain the term and context of 'sustainable location'.
	* This policy does not make a strong enough case for the transport aspects of this activity. It is suggested that an additional bullet point should be included (There is no adverse impact on the transport network in terms of the nature and volume of traffic).	See response above.	Amend supporting text to explain the term and context of 'sustainable location'.
	How do you deal with redundant buildings not in sustainable locations? Buildings would degrade - criteria should be removed.	It is not the intention of the Core Strategy to allow residential development all over the countryside and therefore it will be acceptable in some cases for buildings to fall into disrepair and these also form part of the rural scene. If however, buildings are identified as a heritage asset, as outlined in PPS5, enabling development may be permitted to conserve the building/s - the value of this would need to be weighed against any departure from 'normal' planning policy.	No Change.

	* Should have regard to nationally designated areas such as AONBs. Supportive of proposals where they do not adversely impact upon the objectives of AONB Management Plans and have particular consideration for landscape and visual impact, impacts upon tranquillity and associated traffic impacts.	AONBs are protected under statutory legislation including the Countryside and Rights of Way Act 2000. The Development Management process would give consideration to AONB objectives and Management Plan if a site located in an AONB. No change required.	No Change.
	* Concerned that business uses may not necessarily be sympathetic to AONB objectives - therefore recommend that an additional criterion be added to EP4 covering AONB objectives and the purposes of the designation I.e. conserving and enhancing natural beauty.	See response above.	No Change.
	In practice designated sites are rarely affected by such proposals to the point that I don't think they're worth mentioning here, plus they would also be covered by other national policy (PPS9) and legislation. However, protected species are a frequent consideration in practice and should be included. I don't like the terminology 'has regard for'. The implications vary according to the level of protection so it's not really feasible to generalise. Conversions of such buildings can also represent the loss of potential future roosting and nesting sites for bats and birds and potentially impede recovery or expansion of populations of species of conservation importance. I therefore recommend that all such conversions are subject to provision of roosting/nesting features as part of the design.	Amend Policy to require re-use to 'respect' rather than 'have regard to'. Retain reference to designated sites as the future of PPS9 in light of the National Planning Policy Framework is unclear. The comment regarding some form of future proofing, would result in an onerous request all residential conversions include provision for roosting/nesting for birds or bats in the area as this may be unreasonable. The environmental value of a building (to wildlife) will be identified at the Development Management stage through consultation and any design requirements should be sought on a case by case basis.	No Change.
	* Need to ensure this type of development complies with the three Habitats Regulations tests where a proposal will impact upon a European Protected Species.	This is European Law and the authority would need to comply.	No Change.
	*Environment Agency state that during conversions, flood risk should be considered and more vulnerable uses should not be approved.	Flood risks will be considered as part of the Development Management process.	No Change.
	*Define "structurally sound and capable of conversion without demolition" - there have been cases of complete ruins being rebuilt.	Supporting text to South Somerset Local Plan Policy EH7 defines, a Structural Engineers report is required. Amend supporting text to give additional clarity.	Amend supporting text to define structurally sound.
	* Para 9.47 - these are not both Council documents, one is English Heritage and the other SSDC.	Noted, amend reference so that it is clear which document is which.	Amend supporting text to clarify which document is produced by SSDC and which by English Heritage.

	* Add 'extensions' in bullet point: "the buildings are structurally sound and capable of conversion without demolition or extension."	Noted, amend Policy.	Amend Policy to add word 'extension'.
	* Possible that sufficient weight has not been given to the number of unoccupied buildings in the countryside - retired or near retired people may be delighted to find a good stock of converted and renovated buildings.	Noted, however national guidance is clear that residential development in the open countryside should be controlled and restricted.	No Change.
New Live/Work Units			
Policy EP5 New Build Live/Works Units (and para 9.49)	*Support.	Support noted.	No Change.
	*Object to the Council not supporting live work units in the countryside.	Whilst the Policy is contrary to national guidance contained in PPS4 (Policy EC2) and support for live/work units are reinforced in the draft National Planning Policy Framework. There is local evidence that live/work units do not work. Since 1997, there have been 36 applications for live/work units and of the 18 approvals (for 36 live/work units) only 1 unit has been delivered and is operating as a true live/work unit, 19 are residential only units (either with or without planning permission). The District Council is supportive of Home Working and do not believe that Live/work offers anything more. No Change to Policy.	No Change.
	*This is contrary to Government Policy and should support live/work by imposing more conditions to ensure they work in the manner intended not abandoned as too difficult to enforce. Recommend redrafting Policy EP5 to encourage live/work units where other criteria are met, in areas not normally allocated for residential development.	See response above.	No Change.
	* Encourage the Council to reconsider the blanket restriction of live/work units. Policy should be redrafted to stop the conversion of these units which do provide a useful supply of start-up and small business accommodation. At the moment the policy does not allow any live/work units within the District.	See response above.	No Change.

	* It is wrong to rule out live/work homes when it is demonstrable that one of the defining trends of the last decade has been home working. Particularly in electronics, silicon and aerospace that proliferate in the south west region. This also contradicts the aim to reduce carbon emissions and traffic congestion through reducing travel need.	See response above.	No Change.
	*This policy should be reworded to be clearer, simpler and better reflects the approach explained in para 9.49.	Noted, amend Policy to be clearer.	Amend Policy to be clearer.
	* Needs editing to correct grammar and make it read more clearly.	Noted, amend Policy to be clearer.	Amend Policy to be clearer.
Expansion of Existing Businesses in the Countryside			
Policy EP6 Expansion of Existing Businesses in the Countryside (and paras 9.50 - 9.53)	* Supportive of proposals where they do not adversely impact upon the objectives of AONB Management Plans and have particular consideration for landscape and visual impact, impacts upon tranquillity and associated traffic impacts. The scale, design, materials, layout and hard and soft landscape scheme of proposals should not be of any adverse landscape and visual impact.	AONBs are protected under statutory legislation including the Countryside and Rights of Way Act 2000. The Development Management process would give consideration to AONB objectives and Management Plan if a site located in an AONB. No change required.	No Change.
	* Policy does not include the policy wording from the findings of the HRA on Bracket's Coppice SAC and therefore the Core Strategy cannot be considered Habitats Regulations compliant. Policy should be more explicit in that effects can occur outside designated site boundaries that can affect conservation objectives of Natura 2000 sites (suggested text for additional bullet point supplied).	Disagree with point, the wording of the Policy does not concentrate on land within designated sites and could be applied to impacts of development on land outside of Natura 2000 sites.	No Change.
	* Only protects land within designated sites and does not take into account the fact that effects can occur outside designated site boundaries that can affect conservation objectives of Natura 2000 sites. Therefore add: 'land outside a designated site which nonetheless ecologically supports the conservation objectives of a Natura 2000 site unless it can be proven that there would be no significant effect.'	See response above.	No Change.

	*Amend the wording to add "undue" before traffic generation, otherwise many opportunities in a rural area will be less likely to come forward.	Disagree with comment, the bullet assumes that there will be a level of traffic associated with the expanded business, but that that this must not compromise safety and must be accommodated on the road network without creating a negative impact. Do not feel that the bullet would inhibit expansion of businesses.	No Change.
	* An additional criterion should be added to draw attention to potential issues associated with the creation of noise of conflicting land uses (it does not harm the amenity at nearby development or conflict with expectations for adjoining land uses).	Design Policy EQ2 deals with the amenity of neighbouring properties adjoining land, there is no need to amend the policy in light of this as it is covered.	No Change.
Tourism			
Tourism (paras 9.54 - 9.60)	*The Core Strategy should not just cite national guidance, but should expand on national policy and make it clear that support is given to proposals for the enhancement, consolidation and expansion of existing tourist facilities where such a proposal will: improve the range and quality of accommodation, offer significant improvements and help to maintain develop the tourist industry.	Noted, the supporting text should be amended to explain the value of tourism to the South Somerset economy and not simply cite national planning policy. The role of the historic environment should also be recognised.	Amend supporting text to clarify how tourism supports the South Somerset economy and the role of the historic environment to tourism and regeneration.
	* This section should include recognition of the value and contribution that the historic environment plays towards the area need to be made clear. PPS4 opens up opportunities for the historic environment to feed into the strategy.	See response above.	See response above.
	*Delete this section as there is no evidence to support the assertions. Reference to tourism is misleading and there is a huge hospitality industry which is not considered. Tourism is simply part of standard economic development and no more special case for agriculture, aerospace, light engineering, transport, packaging or any other large local sector.	Disagree with deleting the section, tourism is recognised in both PPS4 and the draft National Planning Policy Framework as a stand alone issue and therefore planning guidance at a local level is justified.	No Change.
New Tourism Proposals			
Policy EP7 New Tourism Proposal (and para 9.61)	Support this policy, especially the need to ensure that there is no harm to environmental assets.	Support noted.	No Change.
	*Support, provides clear guidance on the development of new tourism proposals.	Support noted	No Change.

	* Only protects land within designated sites and does not take into account the fact that effects can occur outside designated site boundaries that can affect conservation objectives of Natura 2000 sites. Therefore add: 'land outside a designated site which nonetheless ecologically supports the conservation objectives of a Natura 2000 site unless it can be proven that there would be no significant effect.'	Disagree with point, the wording of the Policy does not concentrate on land within designated sites and could be applied to impacts of development on land outside of Natura 2000 sites.	No Change.
	* Policy does not include the policy wording from the findings of the HRA on Bracket's Coppice SAC and therefore the Core Strategy cannot be considered Habitats Regulations compliant (suggested additional text supplied).	See response above.	No Change.
	* Is there such a thing as the 'national directive for protection of the countryside?'	Noted, delete Policy wording which states "national directive for protection of the countryside" and replace with a more suitable wording to refer to protecting the countryside for the countryside's sake.	Amend Policy EP7 to delete the words "national directive for protection of countryside" and replace
	*Amend policy to support the maintenance and enhancement of historic buildings for tourism purposes. Also to allow extension and expansion of buildings and sites.	It is suggested above that the Core Strategy be amended to refer to the economic value of heritage assets, where the supporting text is amended to refer to this point, the use of such buildings for tourism purposes should be noted. Furthermore PPS4 requires where possible tourist facilities to be located in existing buildings, suggest Policy EP7 is amended to reflect this requirement. Extension and expansion would be covered by the term 'new tourism proposals', but if policy is amended to refer to 'new and enhanced tourist facilities' this clarifies the issue.	Amend Policy EP7 to refer to new tourist facilities being located firstly in existing buildings and 'new and enhanced tourist facilities'.
	* An additional criterion should be added to avoid risk of noise and vibration issues (suggested additional text supplied).	These matters would be considered at the Development Management stage alongside other amenity issues, there is no need to include these issues in the Policy.	No Change.
	* 2nd bullet point should make reference to multi-use paths or bridleways as these in themselves can be a tourism proposal as well as vital sustainable access options to other proposals.	Multi-use paths and bridleways are classed as other sustainable modes of travel, suggest they are noted in the supporting text.	Amend supporting text to refer to multi-use paths and bridleways.
	*Policy ignores guidance for caravans, tents and static caravans, these are particularly important and need policy guidance.	Policy EC7 of PPS4 provides guidance on the development of touring caravan sites and chalets. This supplemented by Policy EP7 sufficiently covers their development.	No Change.

Major New Tourist Facilities			
Policy EP8 Major New Tourist Facilities (and para 9.62)	*Delete policy, if a major new tourism assets were planned, it should be tested in its own right, employment will be supported.	Agree, instances of major facilities will be few and far between, this policy is not required. Amend Policy EP7 and its supporting text to be applicable to major tourist facilities.	Delete Policy EP8 and amend Policy EP7 to cover major facilities.
	* Support tourism where compatible with the objectives of AONBs, but there is a presumption against major new tourist development within the AONB; and care should be taken to ensure that the effect of major tourist development in close proximity to the designation does not have an adverse impact upon its special qualities.	Given the response above, these comments are no longer relevant.	No Change.
	* An additional criterion should be added the guard against impact on the environment (suggested additional text supplied).	See response above.	No Change.
	* Policy does not include the policy wording from the findings of the HRA on Bracket's Coppice SAC and therefore the Core Strategy cannot be considered Habitats Regulations compliant (suggested additional text supplied).	See response above.	No Change.
Farm Diversification			
Policy EP9 Farm Diversification (and paras 9.63 - 9.66)	*Farm Diversification needs defining, it should involve adding value to farm produce coming from that farm and not mean activities which have no need to be in a rural location.	PPS4 defines farm diversification as covering all forms of business development, as long as they are consistent in scale and environmental impact with their rural location. Therefore farm diversification schemes do not need to add value to farm produce, but they do need to demonstrate that they are supporting a viable farming business. In this way non-agricultural development can be put forward as part of a farm diversification scheme. The draft National Planning Policy Framework simply states that the development and diversification of agricultural businesses should be promoted, which reinforces PPS4. Given the confusion, suggest amending the supporting text to clarify the term farm diversification.	Amend supporting text to clarify the term farm diversification.
	* Diversification should not allow any business activity - proposals should be related intrinsically to the land or farm and should not constitute a fundamental change of land based business activity.	See response above.	Amend supporting text to clarify the term farm diversification.

	* Many farm complexes are based around historic buildings and play an important role in shaping the form of historic landscape characteristics of an area. Because of their sensitivity EP9 should include a reference to historic farmsteads as part of an assessment criteria.	The purpose of Policy EP9 is to support farm diversification proposals which support viable farming enterprises, are of an appropriate scale and are suitably located. Policy EQ2: Design deals with historic assets and the Development Management process will address at planning application stage.	No Change.
	*Reword second bullet point to "...adverse impacts to the integrity of national and international wildlife and landscape designations."	Noted, amend Policy accordingly.	Amend 2nd bullet point of Policy EP9 to recognise adverse impacts to the integrity of national and international wildlife and landscape designations
	* Policy does not make a strong enough case for the transport aspects of this activity. It is suggested that an additional bullet point is added (suggested text supplied). Policy should also include travel plans (where development meets the relevant thresholds).	Bullet point 1 'compatible with its location' covers transport issues. Policy TA2: Travel Plans covers the requirement for Travel Plans, there is no need to duplicate this requirement.	No Change.
Retailing and Town Centres			
Policy and Trends			
Policy and Trends (paras 9.67 - 9.77)	*Support use of Town Centre boundaries, pending replacement by the Local Development Document. More recent decisions by Area Committees would be capable of being considered. An appropriate Town Centre definition and zoning is an urgent task.	Support noted. The Town Centres of Ilchester, Milborne Port and Stoke Sub Hamdon will be defined for the Proposed Submission Plan and the Core Strategy includes a commitment to reviewing all the retail boundaries as part of a Development Plan Document.	No Change.
	*Para 9.68 needs redrafting it is confusing - does it have to be so specific.	Noted. The majority of this text will however need to be replaced as it will be out-of-date following the identification of Town Centre boundaries for Ilchester, Milborne Port and Stoke Sub Hamdon.	Amend supporting text to clarify Town Centre boundaries & Primary Shopping Frontages.
	* Paragraph 9.71 states that a night-time economy is to be encouraged but policies only deal with retail matters so how is this to be achieved? Wording of the section titles should reflect their policies - especially in the section on Retailing and Town Centre Uses which apart from retailing is entirely silent on other uses.	Points noted. Policies EP10 - EP14 should relate to town centre uses, covering those defined in PPS4 and not just retailing. The section can be amended to reflect PPS4 and the wider Town Centre uses, by making some minor changes to wording and cross referencing Policy EP2 (Office Development).	Amend Policies EP10-EP14 to reflect PPS4 and fact that town centre uses are greater than just retailing, and cross reference Policy EP2 in supporting text.
Retail Hierarchy			
Policy EP10 Retail Hierarchy (and paras 9.78 - 9.80)	*Support.	Support noted.	No Change.

	*Third paragraph of policy needs to refer to "above listed" market towns for clarity.	The draft Core Strategy retail hierarchy as outlined in Policy EP10 reflects the settlement hierarchy (Policy SS1), although national guidance and evidence from the Retail Study and Settlement Role and Function Study suggests revision is required. In retail terms, the Market Towns can be subdivided into Market Towns and District Centres, thereby creating a 4-tier retail hierarchy.	Amend EP10 to include a new retail hierarchy as required in national guidance.
	*Support maintenance and enhancement of retail facilities in Ilchester.	Support noted.	No Change.
Policy EP11 Presumption against Major Regional Shopping Facilities (and para 9.81)	*Support.	Support noted.	No Change.
	*'Regional' has no meaning, nor does 'sub-regional' but it would err on safe side to use this.	PPS4 refers to the term 'regional centre' therefore it does have meaning other than in the Regional Spatial Strategy sense. Having said that, it is felt that this policy is no longer required with the suggested revisions to EP10.	Delete Policy EP11.
The Sequential Approach to Development			
The Sequential Approach to Development (paras 9.82 - 9.86)	*This entire section re-states a national planning policy, not good practice to repeat in local documents.	Whilst the sequential test is clearly set out in PPS4 and duplicating the PPS in the Core Strategy is unnecessary, the draft National Planning Policy Framework (NPPF) (July 2011) which reinforces the sequential test, does make some fundamental changes (omits offices and states LPAs should 'prefer' applications for uses to be located in the town centre). In light of this, the section should be reworded to illustrate the importance of the sequential test in making planning decisions (being mindful of the emerging NPPF) without duplicating national guidance and a New Policy should be introduced to cover applications for main town centre uses which are not in an existing centre. This approach is recommended in the South Somerset Retail Study Update 2010.	Rewrite paragraphs 9.82 - 9.86 to prevent duplication of national policy, but to illustrate the importance of the sequential test in making planning decisions amend Policy EP12 to cover the sequential approach in detail. The amendment will establish the sequence of preferred locations for development of town centre uses.

	<p>* Paragraph 9.86 text should be deleted and insert new text to cross-refer to Policy EC17 of PPS4. Paragraph 3 of PPS4 states that it is not necessary to reformulate the development management policies of the PPS.</p>	<p>Whilst the sequential test is clearly set out in PPS4 and duplicating the PPS in the Core Strategy is unnecessary, the draft National Planning Policy Framework (NPPF) (July 2011) which reinforces the sequential test, does make some fundamental changes (omits offices and states LPAs should 'prefer' applications for uses to be located in the town centre). In light of this, the section should be reworded to illustrate the importance of the sequential test in making planning decisions (being mindful of the emerging NPPF) without duplicating national guidance and a New Policy should be introduced to cover applications for main town centre uses which are not in an existing centre. This approach is recommended in the South Somerset Retail Study Update 2010.</p>	<p>Rewrite paragraphs 9.82 - 9.86 to prevent duplication of national policy, but to illustrate the importance of the sequential test in making planning decisions amend Policy EP12 to cover the sequential approach in detail. The amendment will establish the sequence of preferred locations for development of town centre uses.</p>
	<p>* Paragraph 9.82 new text should be added following this para which reflects the guidance in Policy EC2.1(e) of PPS4 - see para 6.25 of Retail Study Update 2010. Principle has been taken up with office development and should apply equally to retail (co-location of compatible uses). Final bullet under paragraph 9.82 should be amended. Suggested wording supplied.</p>	<p>Policy EC2.1(e) states that LPAs should ensure that their development plan identifies, protects and promotes key distribution networks, and locates or co-locates developments which generate substantial transport movements in locations that are accessible, avoiding congestion and preserving local amenity as far as possible. The aim in paragraph 9.82 of the draft Core Strategy, reflects the general aim of Policy EC2.1(e) in that it is seeking to locate town centre uses in accessible locations, to reduce the need to travel by less sustainable modes of transport, but it does not address the co-location of retail uses. The issue with co-locating out-of-centre retailing is covered in the South Somerset Retail Study (2010) where it is stated that "should, through future planning applications, there be a proven need for additional retail warehouse floorspace (which can't be provided for in the Town Centre) then the Council will need to consider the most appropriate location for this provision.</p> <p>It appears logical and sustainable that the starting point for such an assessment will be the consideration of locating new uses immediately adjacent to existing retail warehouse provision and to seek improvements to public transport accessibility. Agree reference to co-locating uses should be included.</p>	<p>Amend paragraph 9.82 to include a reference to the co-location of retail uses.</p>

Development within Town Centres			
Policy EP12 Retail Vitality and Viability and Policy EP13 Protection of Retail Frontages (and paras 9.87 - 9.89)	* There is no mention as to how the aim to improve and safeguard local shopping will be achieved.	The policy aims to safeguard local shopping by retaining a core retail function in Town Centres, by preventing the change of use of shops to other uses and by creating a mix of other uses (both day and evening related), in the appropriate places, so there are lots of shops/services/facilities to attract people into Town Centres. Planning policy can only regulate the use of buildings and cannot safeguard by other means such as marketing etc. These aims are clearly explained in the existing Policies and supporting text, there is no need for further explanation.	No Change.
	*Sensitive policy when looking at the vitality and viability of our smaller market towns' retail heart - as worded not clear what types of use are excluded (limit to A and B1).	PPS4 clearly defines main town centre uses and therefore it would be prudent to revise Policy EP12 to apply to 'main town centre uses' which then are defined by national guidance.	Amend Policy EP12 to refer to main town centre uses.
	* Whilst Policy is acceptable concerns are raised regarding the supporting text which seems to contradict the parking standards. The inference seems to be that the strategy seeks to encourage more car borne trips to town centres. Would be helpful to make reference to the management of any additional parking provided, so that the district retains a degree of control over charging structure etc. This would allow it to be aligned with that of their own car parks.	Amending the supporting text and making a reference to Policy TA4: Parking Standards, should clarify the concern. With regard to the management of any additional car parking (above that required to serve the retail development) it may not be achievable or desirable to include such a requirement. If a need for additional car parking is identified at the planning applications stage, the District Council can negotiate land etc though the Development Management process.	Amend supporting text making reference to Policy TA4: Parking Standards.
	* Feel issues such as empty shops and industrial units have not been addressed. They need more attention and should take priority over new projects.	It is unclear in what way the respondent feels that empty shops and industrial units have not been considered. Changes of use are dealt with through Core Strategy Policies EP13 and EP3, further guidance in unnecessary. Bringing uses back into use are not Core Strategy issues.	No Change.
	*(YEOVIL) - When Yeovil's Town Centre uses are reviewed, it may be necessary to recognise the separation of the night-time economy from the retail centre - spatial planning consequences at end of Princess Street, Box Factory, Stars lane	Noted for consideration in forthcoming Development Plan Document which will review all the retail boundaries.	No Change.

	*(CREWKERNE) - Crewkerne Town Council object to the limited extent of the PSF, given the strong vitality and viability of the existing centre would like an extension to 'grow' more - suggested extent attached (1203137).	See response above.	No Change.
	*(ILMINSTER) - Ilminster's Town Centre and Primary Shopping Frontages should be reviewed and spread into West Street beyond the perceived commercial heart of the centre.	See response above.	No Change.
	*(SOMERTON) - Somerton's primary shopping frontage should include the area around parish rooms, and large retail shops like Overt Locke, the Post Office, the fish and chip shop, and the Half Moon car park.	See response above.	No Change.
	*(WINCANTON) - Whilst providing for housing and employment growth the Core Strategy does not make provision for retail growth nor does it make any allocations. If retail offer in market Towns is not improved residents will be forced to travel to centres such as Yeovil and Gillingham. Wincanton is an example of a place where this leakage occurs and is a location where it is considered that there is significant scope for improving retail offer. Consider that the Council is not being realistic about the scope of improving retail facilities' where Town Centres are constrained in capacity to grow. Providing sites in out of centre locations but as close as possible to existing centres would reduce this leakage of expenditure and improve self containment.	The Core Strategy does not make allocations for housing, employment or retailing in Market Towns such as Wincanton, it identifies a scale and direction of growth. With regard to retailing, the South Somerset Retail Study Update (July 2010) and (November 2011) indicates capacity for approximately 1600 sq m of convenience retail floorspace and 710 sq m of comparison retail floorspace in Wincanton to 2026. The Carrington Way area is viewed as the focus for this growth as the Town Centre is not currently believed to be constrained. In line with PPS4 and the sequential test, should there be additional capacity for retail growth in Wincanton to the end of the Plan period and no Town Centre sites are suitable, available and viable, then less sequentially preferable sites may be considered acceptable. The Development Management process has the ability to guide this, and no change is required to the Core Strategy.	No Change.

	<p>*(WINCANTON) - Needs to be acknowledged that Wincanton Town Centre is constrained, new facilities do not have to be to the detriment of the existing Town Centre, new facilities within walking distance would attract people to shop in the town. The suggested Car park sites are unrealistic. Consider that the Council needs to take a sequential approach to selecting a site for new comparison floorspace in Wincanton in accordance with PPS4. Given the dense nature of the core of the town and landscape constraints out of centre sites need to be considered as the only viable option when considering large scale retail development. Optimal location for this development would be within a corridor between the A303 junction and the town centre as this would be accessible to residents and maximise opportunities to create better linkages between existing retail development.</p>	<p>See response above.</p>	<p>No Change.</p>
	<p>*(WINCANTON) - Places like Wincanton have significant scope to claw back expenditure from surrounding towns. GVA Grimley's projected capacity for convenience shopping floorspace in Wincanton is 1577sqm by 2026, which cannot be accommodated within the existing Town Centre as little land exists given constraints such as landscape and Conservation Area. A similar position exists for comparison floorspace. The sites considered in para 9.97 of the Draft Core Strategy are not realistic or viable - developing these sites would reduce parking provision and make the town a less desirable shopping destination. To make Market Towns more desirable shopping destinations if land cannot be identified within the Town Centre then additional land is required outside of (but close to) existing Town Centres - Contend that in Wincanton no such land has been identified in the Town Centre. Suggest that an additional section is added to Policy EP12 to allow retail development in edge and out of centre locations in Market Towns (suggested additional text supplied). Retail strategy is not justified.</p>	<p>See response above. Regarding para 9.97, the South Somerset Retail Study makes note of the car parking function of the two sites. It concludes that the Memorial Hall Car Park is unlikely to be commercially attractive and development in Carrington Way would need to consider the parking function. The relocation of the Doctor's surgery will provide a key town centre site and so concerns over the capacity of the Town Centre are not substantiated.</p>	<p>No Change.</p>

	<p>*(WINCANTON) - Further suitable land should be allocated at Wincanton to ensure that the strategy remains flexible. Support the aspirations identified in the Wincanton People's Plan. Consider that there is scope to improve retail offer in out of Centre locations. Consider that the GVA Grimley Retail Study Update (2010) does not give the full picture. Barton Willmore undertook an analysis of the retail capacity on 2008 and identified the the Council's Retail Study was very conservative in it's approach because it does not suggest improving the retention rates. These are currently very low. Barton Willmore study identified that market share of convenience goods share in Wincanton Area: Wincanton 33%, Gillingham 31% and Yeovil 15% in BW experience they would expect Wincanton to retain a higher proportion of the market. Would therefore ask why the studies undertaken do not address this issue and recommend expenditure is 'clawed back'. Comparison goods market share is very poor in Wincanton with 47% going to Yeovil (SSDC Retail Study Update 2009).</p>	<p>The Barton Willmore study precedes the South Somerset Retail Study Update, and therefore the South Somerset study shows the most recent situation. The overall retail strategy (Policies EP10 to EP15) seeks to 'share' retail growth across Yeovil, the Market Towns and Rural Centres in accordance with their role and function. Policies also introduce a limit on the level of growth in Yeovil to prevent it overtrading to the extent that it negatively impacts on other centres.</p>	<p>No Change.</p>
	<p>*(WINCANTON) - Propose that the Tything Commercial Site Centre and the Long Close site should be considered as locations for larger scale retail uses that are too big to be accommodated in the Town Centre (should be subject to the suggested amendments to Policy EP12).</p>	<p>The Tythings and Long Close are either allocated or existing employment uses, and neither are in the Town Centre, where the Retail Survey suggests new retailing should be concentrated. The suggestion is contrary to national planning policy in terms of the sequential test (for site selection) and loss of employment land, which is an issue raised by Councillors in Wincanton.</p>	<p>No Change.</p>
<p>Retail Study Update 2010 and Development Implications for Main Centres</p>			
<p>Policy EP14 Comparison Floorspace in Yeovil (paras 9.90 - 9.100)</p>	<p>*Policy should set out the preferred extent of expansion and an acceptable phasing/sequence of development - this will control development in the town centre.</p>	<p>The retail study has considered 6 sites within the existing Yeovil Town Centre boundary that have the potential for retail/mixed use redevelopment. In the context of PPS4's sequential test, these are central sites which should be developed first before sites outside of the Town Centre. It is not the place of the Core Strategy to determine the sequence of site redevelopment, but to guide development into the Town Centre, which it is doing.</p>	<p>No Change. Move Policy and supporting text to Yeovil section in Chapter 5.</p>

	<p>* Comparison floorspace figure are inconsistent with the Retail Study Update 2010 and are therefore not justified and unsound. Wording should be amended to reflect paragraphs 5.30, 6.20 Table on p.97 and Tables 16a/16f net increase o 10,000 sq m by 2026 should be amended to 5,000 sq m by 2021 and 13,000 sq m by 2026. Suggested amendment to final sentence of the policy supplied - Amend the final sentence of the policy to read: "The figures above are indicative and based on a number of assumptions. There are also growing margins of error in longer term forecasting. Therefore, the capacity figures are to be regularly monitored and reviewed to take account of changing circumstances".??</p>	<p>Policy EP14 does not reflect the Retail Study update November 2010 which revised the figures (retail capacity model) based on the proposed draft Core Strategy district-wide population growth and housing distribution data. The policy needs revising accordingly. Also, it would be prudent to amend the policy to illustrate the retail expenditure capacity (as well as the floorspace capacity which is currently shown) as these figures, as stated in the published retail survey, take priority, as the floorspace equivalent data is based on indicative retail sales density performance levels (which can vary between different styles of food and non-food retail operators). The current policy includes a sentence relating to monitoring, this should be sufficient. Note that GVA Grimley (retail consultants who undertook retail study in 2010) state that the figures will need to be updated once we have agreed the scale and distribution of growth, to extend the timeframe to 2028 and to reflect changes to data such as retail expenditure levels and forecasts.</p> <p>A reference to this should be included in supporting text.</p>	<p>Amend Policy EP14 and its supporting text to incorporate revised retail figures (November 2010). Move Policy and supporting text to Yeovil section in Chapter 5.</p>
	<p>*Para 9.98 is at odds with 5.58, find it difficult to believe that there is sufficient retail growth to use all these sites without emptying the Town Centre.</p>	<p>The purpose of assessing the retail use of the sites listed was not to develop them all, but to demonstrate that there were sequentially preferable sites in the Town Centre which have the ability to be developed for main town centre uses.</p>	<p>No Change.</p>
Out-of-centre Retail Development			
Out-of-centre Retail Development (para 9.101)	No Comments.	N/A	N/A
Local District Centres			
Policy EP15 District and Local Centres (and para 9.102)	*Support.	Support noted.	No Change.

	*Switching between PPS4 terminology and other terminology used in the Core Strategy is unhelpful for the reader.	Annex B of PPS4 defines District and Local Centres as (1) A District Centre will usually comprise groups of shops often containing at least one supermarket (less than 2,500 sq m floorspace with supporting car parking) or superstore and a range of non-retail services such as banks and restaurants and public facilities such as libraries. (2) Local Centres include a range of small shops of a local nature, typically would include a small supermarket, newsagent and pharmacy. Small parades of shops are not regarded as centres in PPS4. The policy relates to Neighbourhood Centres and not District or Local Centres, so agree the terminology is confusing.	Amend wording and title to Policy EP15 to clarify policy refers to Neighbourhood Centres.
	*Policies should meet PPS4 criteria.	The Policy does not conflict with PPS4 guidance, it seeks to provide the opportunity to access day-to-day services locally, thereby reducing the need to travel, without damaging the vitality, viability and appeal of higher order town centres.	No Change.
	*Suggest word "developments" in line 4 is replaced with "areas".	Agree, the suggested wording would be better.	Amend wording in Policy EP15 to replace the word "developments" with the word "areas".
Retention of Services and Facilities			
Policy EP16 Protection and Provision of Local Shops, Community Facilities and Services (and paras 9.103 - 9.110)	*Strongly support (area East).	Support noted.	No Change.
	*Add cultural facilities to the list.	Agree logical to add cultural facilities to the type of site/premises list for a belt and braces approach to policy.	Amend Policy EP16 to include "cultural" facilities.
	*Object to the non-recognition that development is needed to support community facilities.	South Somerset's settlement hierarchy workshop discussion paper March 2011 Rural Service Provision, does not support the notion that new housing results in the retention of community facilities. The key findings of the research are summarised below:	No Change.

		<p>For the District overall, in the period 1991 to 2010 dwellings increased by about 16% whereas facilities decreased by about 20%. Excluding the figures for Yeovil Without, which includes parts of the built up area of Yeovil, results in a dwelling increase of about 8% but a reduction in facilities of about 29%;</p> <p>In terms of facilities banks/building societies showed the greatest decline (down by 79%) followed by post office/shops (down 55%) and food shops (down by 49%), general stores declined by 8% café/restaurants/take-away are down by 7% and non-food shops declined by 6%. The only service to increase overall is post offices (up 67%). This seems contrary to what might be expected given the recent programme of post office closures, however as already noted post office/shops have declined by 55% which could suggest that the post office facilities that have been lost fall into this category;</p> <p>Of the parishes that lost facilities there was an overall growth in dwellings of 67% (ranging from 41.8% to 5.6%);</p> <p>In the parishes that gained facilities, there was a 12.5% overall housing growth (ranging from 3.5% to 36.4%);</p> <p>Where the level of facilities remained static there was an overall housing growth of 40% (ranging from 2.9% to 34%);</p> <p>In the 10 parishes (excluding Yeovil Without) with the lowest housing growth (2.4% to 6.8%) 6 were no change, 4 lost and none gained facilities;</p> <p>In the 10 parishes with the highest housing growth (41.8% to 23.8%) 4 gained facilities, 3 lost facilities and in 3 the level of facilities stayed the same. The parish with the highest level of housing growth lost facilities;</p> <p>Only 12.5% of overall housing growth came from parishes that gained facilities.</p>	
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