

Area West Committee – 21st March 2012

## **7. South Somerset Core Strategy – Consideration of Representations and Recommendations for the Proposed Submission Draft**

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### **Purpose of the Report**

To give the Area Committee the opportunity to comment and make recommendations to District Executive Committee on proposals and recommendations arising from consideration of the public consultation stage on the South Somerset Core Strategy.

### **Public Interest**

The South Somerset Core Strategy contains land use policies and proposals vital to the future of the District. This report gives Members of the Area Committee opportunity to make comments on the proposed changes to the Core Strategy in the light of extensive public consultation that took place during late 2010. Each Area Committee will only actively consider those development issues within their area boundaries.

### **Recommendation**

That subject to any comments and recommendations they may wish to make for District Executive consideration, members endorse the recommendations contained in the draft report on the Core Strategy to the District Executive Committee.

### **Background**

The draft Core Strategy was the subject of consultation in October – December 2010. Since that time work has been underway considering representations, new evidence base and emerging Government policy to derive a revised plan for publication. The outcome of this work is now available for consideration by the District Executive prior to consideration by full Council.

### **Report**

The report to District Executive has been drafted and contains the recommendations of the Project Management Board (PMB - set up by District Executive to oversee the Core Strategy process). Members have an opportunity to consider the work done to date and the recommendations of the PMB prior to their consideration by the District Executive. The District Executive report is appended and is due to be considered on 26<sup>th</sup> March 2012.

### **Financial Implications**

No direct implications although proposals in relation to policy on planning obligations and Community Infrastructure Strategy will affect moneys collected in relation to planning

applications for development and the level of development proposed generally will impact on the tax base of the Council.

### **Corporate Priority Implications**

The Core Strategy is central to the delivery of the Corporate Plan by virtue of determining spatial policy for the Council.

### **Carbon Emissions & Adapting to Climate Change Implications (NI188)**

Policy EQ1 presents strong policy support for the control of carbon emissions and the adaptation to Climate Change. The overall settlement hierarchy has been framed with minimisation of carbon impacts from travel to the fore

### **Equality and Diversity Implications**

The rewording of the draft Core Strategy will be undertaken with a full Equalities Impact assessment undertaken and reported.

**Background Papers:**     *None*

## **Draft Report to District Executive – 26th March**

### **South Somerset Core Strategy – Consideration of Representations and Recommendations for the Proposed Submission Draft (Executive Decision)**

*Executive Portfolio Holder: Tim Carroll, Finance, Legal & Spatial Planning*  
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#### **Purpose of the Report**

To inform Members of the number and nature of responses to the Draft Core Strategy with Preferred Options document published for consultation in October 2010 and the key policy matters emerging, which have been considered by the Local Development Framework Project Management Board (PMB), to which the District Executive has delegated management of the Core Strategy process. The report will present PMB recommendations to amend the Core Strategy, where considered appropriate, in the light of representations received, further emerging evidence base and government policy. The report has been considered by Area Committees and their views are presented as a supplementary report to this in appendix L.

#### **Forward Plan**

This report appeared on the District Executive Forward Plan with an anticipated Committee date of March 2012.

#### **Public Interest**

The South Somerset Core Strategy contains land use policies and proposals vital to the future of the District. This report gives Members of the Committee opportunity to make comments on the proposed changes to the Core Strategy in the light of extensive public consultation that took place during late 2010.

#### **Recommendations**

That the District Executive Committee:

- (1) Consider and endorse the recommendations made on key proposals and policy matters by PMB (set out in the body of the report in italics and presented in summary form in the Summary of Recommendations at the end of this report)
- (2) Note the comments received and endorse the responses made to the public consultation as set out in the attached Matrix of Responses received (Appendix A)
- (3) Note and endorse the summary document identifying resultant changes to the Core Strategy proposals and policies both major and minor in nature (Appendix B).
- (4) Review the PMB recommendations in the light of the formal Area Committees' comments and recommendations on this report as presented in supplementary report Appendix L (including oral reporting of comments from Area West Committee)

## Background

In March 2008, the District Council published an Issues and Options report that resulted in 204 people or organisations responding and 8131 individual responses on the topics to be covered by the Core Strategy. Following the consideration of these representations, the District Council published the Draft Core Strategy (incorporating Preferred Options) in October 2010 for formal consultation, in line with statutory requirements. This generated 942 respondents with 2848 individual comments. A detailed report by the Area Development Manager East on the consultation process is set out as Appendix C. A further period of consultation was extended to those respondents who raised issues about traffic and highway infrastructure in and around Yeovil as a result of additional work on evidence gathering carried out by Parsons Brinkerhoff on behalf of this Council and Somerset County Council, the Highway Authority.

The comments made on this further consultation have been responded to under a separate report by Somerset County Council, which can be found at Appendix D. These comments have informed the review of Yeovil's growth both in terms of scale and location. Two subsequent revisions to this report reflecting technical issues and additional location scenarios have been taken into account.

All of the comments received on the draft Core Strategy have been summarised into an issues matrix (Appendix A) that sets out the main issues raised on a policy or paragraph basis reflecting the Core Strategy numbering. The Matrix sets out a summary of the comment made (by draft Core Strategy page order), the officer response and the officer recommendation.

It should be noted that the revised Core Strategy Plan to be referred to henceforth as the Proposed Submission Plan will be a shorter document setting out the policies and their justification with much of the detailed background not being needed.

Since the Council's publication of the draft Core Strategy the Government has enacted and promoted the Localism Bill, the draft National Planning Policy Framework (NPPF) and other sundry policy statements. These have had to be taken into account where possible. The Framework however has not been taken into account in detail given its consultation status only and how the Framework is to be taken account of is addressed at the end of this report. The Council also needs to take account of new emerging evidence base, and in this regard the following key reports are drawn attention to and their implications have been taken into account by the PMB and are presented within the appropriate sections of this report. They are the Baker Associates report on the Housing Requirement for Yeovil and South Somerset, and the first, second and third Parsons Brinkerhoff reports on the traffic implications of options for growth for Yeovil (non technical Forecasting report February 2011, its addendum of June 2011 and Addendum report 2).

The Council is required to submit an Infrastructure Delivery Plan (IDP) alongside the Publication Plan to indicate that the proposals within the Plan are deliverable. Consultants were appointed to establish infrastructure requirements and funding in order to deliver proposals within the Plan, and to identify development phasing requirements and to allow funding shortfalls to be addressed. The main findings of the IDP in relation to the Core Strategy are summarised within this report and the report itself is appended as appendix K.

The Consultants were also asked to review the Core Strategy planning obligations policy and recommend on the appropriateness of moving to a Community Infrastructure Levy (CIL) and they produced the “approach to developer contributions” report. As part of the consideration of the appropriate approach they also produced a report on Community Infrastructure Levy Evidence Base that is essentially the Market and Viability Assessment required to help decide on adopting a CIL and what rates might be charged in a future Charging Schedule. The Consultant’s reports on the appropriateness of proceeding to a CIL approach within South Somerset and what potential CIL charging rates are to be pursued has been concluded and considered by District Executive, and at the time of writing this report, the Executive are advocating proceeding to a CIL to Full Council and using existing saved policy on obligations in the interim. In doing so relevant representations on the matter were taken into account. A summary of the main recommendations is presented within this report for ease of comprehension. Recommendations not addressed (two of them) within the context of deciding to move to a CIL are specifically addressed in the subsequent section of this report and within the context of wider representations on planning obligations and the requirement still to pursue on site matters post the introduction of the CIL regime after April 2014 by planning obligations.

The responsibility for overseeing the Core Strategy process was delegated to the Local Development Framework Project Management Board (PMB) in 2007. The PMB consists of the Council Leader and relevant Portfolio Holder, Chairman of Scrutiny and relevant Area Chairmen when appropriate. The PMB is supported by several senior officers. The PMB has taken an active role in reviewing representations on the Strategy, considering new evidence and emerging Government policy and it is the recommendations of the PMB that are presented in this report. The PMB has met on 12 occasions together with the relevant corporate officers group there to advise them to oversee the process and deal with major issues raised in consultation on the draft Core Strategy. The papers presented to the PMB and the minutes of meetings are available for public inspection on the Council’s website and in greater detail than this report.

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### **Maps schedule (of proposed changes):**

Chard, Ilchester, Ilminster, Langport / Huish Episcopi, Milborne Port, Somerton, Stoke Sub Hamdon, Wincanton and Yeovil.



## **1. Introduction**

This report sets out the major strategic aspects of the Core Strategy on which people have commented and serves to summarise points made, provide consideration of the issues and present recommendations. The points and considerations are summaries of those presented to the PMB and the recommendations are those of the PMB. The report looks firstly at growth proposals and in particular the scale of growth for the District and the settlement hierarchy, the distribution of growth around the District and growth proposals for rural settlements. It then reviews, in the light of representations made, specific strategic proposals for Yeovil, Chard and the Market Towns.

The separate report on Infrastructure Planning in South Somerset (the IDP) is summarised within this main report here in terms of its implications for the Core Strategy settlement strategy and proposals for growth and is appended (Appendix K). The IDP report has been considered by the PMB and its implications taken into account and reflected in the recommendations made

Consideration is then given on the appropriateness of moving to a CIL regime within South Somerset. The prior consideration of this issue by District Executive has committed the Council to adopting CIL subject to Full Council approval (at the time of writing this report) and moving concurrently to its adoption with the Core Strategy on the basis of the Consultants report received. This was not countered by any representations received on the draft Core Strategy. The commitment to CIL and main argument is summarised in this report. This report also considers the matter of what interim policy on Section 106 planning obligations to adopt prior to CIL being implemented and what policy to apply once CIL is adopted.

The focus then shifts onto policies within the draft Core Strategy and what are considered to be the main areas of policy concern. Where relevant, on both proposals and policies, the implications of new evidence base available is brought to bear, as are the implications of changing government policy. The wider implications of the NPPF for the Core Strategy are set out and the report then concludes on the requirement to redraft the Core Strategy for the next stage of consultation, a review of the comments received on the Sustainability Appraisal and Appropriate Assessment, and reference to finalisation of an Equalities Impact Assessment. Clarification of the need to apply the sustainability and appropriate assessment appraisal and equalities impact assessment to finalise the final proposed Submission text is given.

The full representations and responses to them are set out in the matrix at Appendix A and policies, proposals and supporting text are summarised in terms of those where a change is recommended (either major or minor) in Appendix B. Major changes are generally changes to policy and minor changes relate usually to supporting text (although there are exceptions to this rule). Major changes set out in the list in Appendix B are specifically addressed in this main report on the section on major policy matters. Additional policy changes are summarised at the end of the major policy matters section, and reflect a combination of minor wording changes to policies or substantive changes that have not been addressed directly, or in detail, by the Project Management Board.

The report throughout seeks to summarise representations and where relevant, further evidence base and emerging government policy, and then gives consideration of the matter in hand followed by recommendations. All these aspects are taken from the



reports and minutes of the PMB albeit in a number of places paraphrased in order to make this report legible.

## 2. Scale of Growth and Settlement Hierarchy

### 2.1 End date of Plan

The Government regulations require a 15 year time horizon for the Plan from the date of adoption. Date of adoption is likely in the early part of 2013. An April 2028 end date will therefore be required.

**Recommendation 1:** *An end date of April 2028 be adopted*

### 2.2 District Wide Scale of Growth

There have been many consultation responses in relation to Draft Core Strategy Policy SS3: District Wide Housing Provision. They fall into three camps, those who feel the housing target is too high, those who are happy with the target and those who feel it is too low.

Those who feel the target is too high believe that it is based on population estimates that are unrealistically high and was conceived at a time when economic conditions were much better.

Those who feel the target is too low, cite the draft Regional Spatial Strategy (RSS) target of 19,700 dwellings and question why we are not seeking to deliver this figure. They state that by providing 16% less than the target, we are in danger of undersupplying housing (and the implications of this) in the long-term and additionally of not being in conformity with the RSS, which is still a material consideration.

The PMB first considered the overall scale of growth issue on 26<sup>th</sup> May 2011 and endorsed the 16,000 dwelling provision recommended in the Baker report on Housing Requirement for South Somerset and Yeovil on the basis of the following argument presented to them in summary.

“Bakers report provides strong evidence that population, household and economic growth projections point to 16,000 dwelling provision for the District to 2026. There is some recent evidence of tail off of population projections, which if economic and demographic trends of recent times persist, will indicate a lower provision of 12,200 dwellings. The facts however that the plan period covers to 2026 and allows time for the economy to gain a normal trajectory, and that the higher projection will crucially enable delivery of the South Somerset's full job potential, point to adoption of the 16,000 figure”.

On the 4<sup>th</sup> July 2011, Area South Committee expressed concerns over the methodology used by Baker Associates to establish that figure. Members requested a workshop with John Baker for him to explain further the methodology used and discuss the housing numbers projected for the District in the Core Strategy to 2028.

## *Commentary*

The main areas of concern expressed in the consultation were:

1. Economic Potential - there were concerns over the methodology used to establish the economic potential of the District.
2. Migration & Population Projections - the figures were criticised, primarily for being based on out-of-date projections, resulting in greater growth than now being projected.

The workshops took place on Monday 13<sup>th</sup> August and Friday 2<sup>nd</sup> September 2011.

The Consultant John Baker addressed the main areas of concern

- (1) Economic Potential - John Baker explained that the scenarios for growth relate to jobs growth as opposed to GDP growth, and making a direct comparison between the two is very difficult.

The methodology used to establish the scenarios was very much a bottom up approach, looking specifically at the local economy and making predictions for growth based on local evidence. The method involved looking at the composition of the economy and analysing the past performance of each sector to start to build a picture of its potential growth. Employers in these sectors were also interviewed to establish their view of their future performance. The local approach gives a robust view of the potential of the South Somerset and Yeovil economy.

The GDP based approach put forward by others suffers from a surfeit of projections from which to choose (15 long term projections by reputable organisations identified by the Government) and that it projects on the basis of the national economy and its structure. The South Somerset economy is different in many ways to the national economic structure and indeed is a more dynamic economy and better placed with representation of sectors that can and need to expand more rapidly over the coming years.

This approach has been used by other authorities and is not unique to the South Somerset approach.

- (2) Migration & Population Projections – John Baker explained that the report was based on 2008 household projection data, which is the latest published by the Government. Having revisited the report using the 2010 mid-year population estimates the Consultants have modified slightly the bottom end of the range of potential housing requirement. The population estimates show that whilst migration rates have been declining since 2007, natural change is now on the increase.

The projection information used is the latest available and the new Household Projections for 2010 are due out in May 2012. Once out in public the Core Strategy process, wherever it is at prior to adoption, will be duty bound to take these latest projections into account. Any such account would need to be endorsed by Members.

The point was reinforced that 16,000 dwellings requirement (2006 to 2026) is very much based on a range of evidence (household projections, natural change, migration, affordable housing requirement and economic potential). Failure to provide sufficient housing for the labour market will stifle the economy and cause additional housing hardship.

Recent discussions with the Department for Communities and Local Government (DCLG) have indicated that they are yet to decide whether to undertake the 2010

household projections. The 2011 Population Projections are due to be published on 21<sup>st</sup> March from the Office of National Statistics and should these present any radical changes to trends then updating of the Council's Housing Requirement projections will be presented to District Executive orally on 26<sup>th</sup> March of this year and subsequently at full Council in April.

Concerns raised by Councillor Fysh in September and October 2011 in relation to growth issues were reviewed and found not to bear on South Somerset but with one exception. (see appendix E Response to Growth Issues raised by Cllr Fysh in September and October 2011). Updated employment information from the Business Register Employment Survey (BRES) for 2010 however required addressing. This latest figure was different from that estimated by the Consultants in the Housing Requirement for South Somerset Report and impacts on the starting figure from which the Consultants projected employment. This has led to a reappraisal of the overall growth figure for the District and a report on this was presented to the PMB at their Workshop 9. The key elements of this re-appraisal and resultant recommendation are presented verbatim in the following paragraphs

The Consultants, on the Housing Requirement for South Somerset and Yeovil Report, estimated employment growth for the period 2008 – 2011 and showed this in para 4.28 and table 4.3 of their report. The upshot of this was an estimated figure for employees in employment at 2010 of 68,200, which coupled with self-employment of 7,800, totalled 76,000 jobs for the District. This was 1,000 jobs more than existed in 2006, the Plan start date, and so these jobs were added to the projected jobs for the rest of the plan period to give the overall job growth 2006 to 2028 against which to derive the commensurate housing requirement.

In reality the figure for 2010 from the BRES survey was 72,900 (64,100 employees, 7,800 self employed and 1,000 agricultural employees not included in the BRES for definitional reasons). This is 2,100 jobs down on the 2006 employment provision at the start of the Plan period rather than the estimated 1,000 job increase over the 2006 starting point estimated in the Housing Requirement for South Somerset and Yeovil report. This clearly is to have a marked impact on final job provision and therefore housing need from the economic projection viewpoint (as demonstrated in tables 1 and 2 below).

The Housing Requirement for South Somerset and Yeovil report projections post 2010 remain unchanged. The survey work and engagement with businesses took place during the latter part of 2010 after the period of job retrenchment and when the economy and job growth had started to become positive again. The Consultant's projections do however demonstrate a slow upturn in provision in the early years post 2010 reflecting current circumstances.

The key tables in the report on economic led housing requirement (tables 4.8 and 4.9) are reproduced below for the period to 2028 with the amended net job growth figures in row (d).

**Table 1 Housing Requirement for South Somerset and Yeovil - Table 4.8 reprised**

(a) Economically active 2006 (ONS Annual Population survey)	77,700
(b) Population 2006 (ONS mid year estimates)	156,700
(c) Households 2006 (ONS mid year estimates)	68,000

**Table 2 Housing Requirement for South Somerset and Yeovil - Table 4.9 Updated and Reprised**

	Scenario 1: (11,500 jobs) <sup>1</sup>	Scenario 2: (7,100 jobs) <sup>2</sup>
(d) Net gain of jobs 2006 – 2028	9,400 <sup>3</sup>	5,000 <sup>4</sup>
(e) Net increase in unemployment 2006 - 2028	300	200
(f) Economically active 2028 (f = a + d + e)	87,400	82,900
(g) Total population 2028 (g = f x 2.02)	176,500	167,500
(h) Private households population 2028 (h = g – 2.2%)	172,600	163,800
(i) Total number of households 2028 (l = h ÷ 2.1 persons per household)	82,200	78,400
(j) Number of additional homes 2028 (j = l – c)	14,200	10,000
(k) Population change 2006 - 2028 (k = g - b)	19,800	10,800

**Note: to calculate the Economic Scenarios up to 2028 to reflect the amended end date of the Plan, Baker Associates undertook the following calculation –**

- Calculated growth from 2016 to 2026 = 6,600 jobs & 4,400 jobs.
- Averaged the 6,600 over the 10 years = 660 jobs pa & 440 pa
- Added the additional jobs onto the total jobs growth for both scenarios (11,200 & 7,200) to obtain the additional 2-year estimations.

Therefore, to establish the new net gain of jobs figure for 2028, same calculation was undertaken (as growth adjusted down by 4,100 to account for lower baseline).

Scenario 1 - 10,200 + 1,320 = 11,500 (rounded)

Scenario 2 - 6,200 + 880 = 7,100 (rounded)

The updated and amended output from the two economic scenarios; the first showing private sector led growth and the second showing private sector led growth but slower, are then 14,200 dwelling growth from 2006 to 2028 and the 10,000 dwelling growth for the same period respectively.

<sup>1</sup> Jobs predicted by work of Baker Associates

<sup>2</sup> Jobs predicted by work of Baker Associates

<sup>3</sup> Baker's job predictions minus 2,100 (net reduction in jobs of 2,100 between 2006-2010)

<sup>4</sup> Baker's job predictions minus 2,100 (net reduction in jobs of 2,100 between 2006-2010) (rounded up)

## Wider assessment of the appropriate housing requirement

In reassessing the economic projections in the light of up to date employment figures care should be taken in that BRES data is a different dataset from the Annual Business Inquiry survey and is not easily made compatible with the ABI data. Whilst the information has been made as compatible as possible this should be borne in mind in making comparison.

Economic projections are not the sole determinants of housing requirements. Population and household projections are crucially important and are particularly relevant in determining housing requirement. Whilst population and economic growth projections are the prime drivers for housing requirement additional factors to bear in mind include market capacity to accommodate housing, access to housing esp. affordable, and maintenance of communities and environment.

A range of requirements was set out in the Baker report to 2026 with a 13,600 dwelling to 16,000 dw range derived from household projections which is now amended to 13050 dw to 17,300 dw reflecting population change from 2006 to 2010 derived from population estimates and a 2028 end date. The derivation of these figures is shown in Table 3 below

**Table 3: Population and Household Projections 2006-2028**

Office of National Statistics (ONS)

	2008 based ONS population projections (+1200pa)	Actual change (06 –10) = ONS population projections 2010 – 28 (+1200pa)	Actual change (06 –10) = lower rates of change of migration 2010 - 28 (+855pa)
Total population 2006	156,700	156,700	156,700
Total households 2006	68,000	68,000	68,000
Actual population change (mid 06 – mid 10)		1,900	1,900
Projected population change (mid 2010 – mid 2028)		21,600	15,400
Projected population increase 06 -28	26,400	23,500	17,300
Total population 2028	183,100	180,200	174,000
Total projected private households population	179,100	176,250	170,200
No of additional households 09-28 (based on 2.1 persons per household)	17,300	15,950	13,050

The economic projections in the original report identified a range of 12,200 dw to 16,000 dw to 2026, which is now amended to 10,000 dw to 14,200 dw on the basis of the

updated employment information and to the later end date for the Plan. The revised economic projections have the effect of widening the overall range by providing a lower bottom to it and suggest a more moderate top of the range in the economic projection.

In determining where the housing requirement should be set within the range given of 10,000 dw to 17,300 dw it is suggested that the upper end of the range is to be preferred for the housing requirement provision choice because it:

- reflects more closely the Council's economic aspirations to encourage economic growth
- maximises economic growth potential and avoids potential growth inhibition due to lack of workforce
- minimises increased congestion and in commuting
- maximises opportunities for affordable housing provision and CIL returns (given that the local building capacity appears in place following discussions with Developers and the Strategic Housing Land Availability Assessment identifies sufficient land)
- minimises upward pressure on house prices other things being equal
- avoids administrative issues and cost associated with early review of the Core Strategy in the event of more rapid economic growth out of the recession than currently anticipated

These advantages are principally at the expense, should a bottom end of the range be preferred of pre-committing levels of Greenfield growth prior to their requirement (in terms of the emerging Core Strategy this principally means the Yeovil Urban Extension and the Chard strategic allocation). In the event that growth doesn't materialise as assumed then housing provision will lay undeveloped but remain ready to take forward as and when events speed up.

It is clearly desirable to move on this basis towards the upper end of the projections, however, does one focus on the household projection of 17,300 dw or the economic projection of 14,200 dw or a figure somewhere in between as a compromise? Furthermore whilst 17,300 dw growth represents the top of the range of household projections it is felt more appropriate to use the middle column figure from table 3 of 15,950 as this has taken into account what has actually happened 2006 – 2010 (estimated from ONS) in the period 2006 – 2010.

Whilst the figure of 14,200 dw will serve to meet the needs of the local economy, the higher household projection based figure will do that also and meet anticipated household and population growth in full and ensure that in migration of older people of pensionable age (or shortly to retire) will not be at the expense of housing availability for economically active households offering South Somerset employers suitable workers. Adopting the higher provision figure will also serve to dampen any house price inflation associated with a tight housing provision, resulting in a higher proportion of house seekers for available housing stock. In a survey of 73 Local Authorities across England undertaken by the Spatial Policy Team in August 2011, less than 20% applied the economic projections directly to derive their housing provision.

A compromise figure between the two upper end figures has no evidential base to justify it. It is neither one thing nor the other.



Whilst not being direct determinants of the housing requirement for the District the market capacity for housing growth and the availability of land are factors that could constrain growth below what would otherwise be the case. However, The Housing Requirement for South Somerset and Yeovil report presents clear evidence of market capacity for the higher provision figure of 15,950 dw, and the District Council's Strategic Housing Land Availability Assessment presents evidence that there is sufficient land for development of this number.

The higher provision figure serves to maximise the opportunity to achieve affordable housing to meet need and the work on the emerging Core Strategy serves to demonstrate that significant new community development can be achieved in Yeovil, Chard, Crewkerne and Ilminster, and environmental impact can be contained to an acceptable level.

There are several other factors that offer contextual evidence that the higher provision figure should be achieved. Firstly the population of South Somerset grew from 142,600 in 1991 to 156,700 at the 2006 start date for the Core Strategy an increase of 10% over 15 years. If the same growth rate occurred over the 22 years of the Core Strategy a final population figure of 179,682 would result. This is above the 176,500 figure produced by the higher economic based projection but just slightly below the 180,200 figure produced by the suggested household projection (applied after accounting for the 2010 population estimate).

Secondly past job growth from a figure of 47,482 in 1991 to 65,200 (including agricultural workers) in 2010 resulted in 17,718 extra jobs in 19 years. This compares with 9,400 jobs anticipated in the higher economic projection scenario over the 18 years from 2010 to 2028 or 5,000 jobs with the lower economic projection.

Thirdly past housing growth of 13,440 dw gross for the 20 years of the previous local plan 1991 – 2011 would equate to 14,784 dw over the 22 years to 2028. If one projects what has happened in first 5 years of the Plan (3435 dw or 687 dw pa) which includes some of the worst conditions for national house building since the 1920s, then a housing figure of 15,114 dwellings emerges. It is worth noting also that during 2008 –2010 when the loss of 2,200 jobs occurred there was a net increase of 1025 dw added to the total South Somerset stock.

There is the potential for the national policy objective of growing our way out of economic difficulties to be hindered by the adoption of local economic and housing targets based on low growth rates for both jobs and housing which will serve to deflate growth on a policy basis and produce a potentially self fulfilling prophecy of lower growth.

The 2010 Household projections will be published in May 2012 and this will entail a review of the upper end figure in the light of this latest information. This should be received before the Core Strategy Public Examination and its implications will be reported to Members for a decision to be taken. (Since these words were reported to the PMB the Government have indicated that the 2010 household projections may not be published in May 2012. The Council will continue to review relevant new projections or growth estimates to ensure its growth projections remain valid.

The PMB in endorsing the main elements of the re-appraisal of the housing growth figure saw and sought to emphasise the importance of the level of growth identified in order to meet communities' aspirations and achieve the Vision for South Somerset. In this regard the level of provision being sufficiently high in order to achieve aspirations was seen as a key determinant of scale of growth. Growth levels need to be sufficient to serve the economic needs of Yeovil as the engine of growth for the wider sub economic area, to



secure the Chard Regeneration Framework's Vision and aspirations, to allow for growth in the market towns and Rural Centres to retain their viability and vitality and to provide sufficient growth opportunity for the implementation of Policy SS2, and enable rural settlements to grow where it was possible to grow in a sustainable fashion.

<b>Recommendation 2:</b>	<i>That a household requirement of 15,950 dwellings from 2006 – 2028 be endorsed for South Somerset and Policy SS1 amended accordingly.</i>
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### 2.3 Review of the Status of Yeovil, Market Towns and Rural Centres

Yeovil's status and category classification of settlements

#### *Commentary*

Whilst not an issue raised significantly in consultation it is considered Yeovil should be called a strategically significant town. Furthermore market town and rural centre terminology should be retained despite some concern relating to potential confusion with titles. All remaining settlements to which policy SS2 applies should be called rural settlements. As long as the terms are defined within the Core Strategy then the terms seem perfectly clear and fit for the identified purpose

<b>Recommendation 3:</b>	<p><i>That the following terminology be adopted within the Core Strategy:</i></p> <ul style="list-style-type: none"> <li>• <i>Yeovil – a strategically significant town</i></li> <li>• <i>Market towns</i></li> <li>• <i>Rural Centres and</i></li> <li>• <i>Rural Settlements</i></li> </ul>
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#### Review of Market towns' status

Chard: Several comments were received in support of Chard's status as a 'Market Town'. A comment suggested that it should be a Primary Market Town as in Policy HG2.

Crewkerne: Support was indicated for Crewkerne being classed as a Market Town.

Ilminster: There was support for Ilminster's status as a Market Town.

Wincanton: There was support for Wincanton being considered a Market Town

Ansford / Castle Cary: There were some comments which suggested that Ansford / Castle Cary should be categorised as a Rural Centre rather than a Market Town, as it has far more in common with the Rural Centres such as Bruton rather than Market Towns like Wincanton. However, other comments felt the settlement should be a Market Town as it performs an important employment function and retail and community service role.

Somerton: Apart from Yeovil, Somerton received the highest volume of comments, with much concern at both its status in the settlement hierarchy and the scale of development. There was some support for Somerton being classed as a Market Town, and the resulting development would help to ensure the future prosperity of the town. However, the majority of comments objected to Somerton being a Market Town, and instead felt it should be a Rural Centre. Consultees felt Somerton is more comparable with the other Rural Centres in terms of employment levels, existing services and facilities, and sustainable travel opportunities

Langport / Huish Episcopi: Langport / Huish Episcopi was proposed as a Rural Centre in the draft Core Strategy (incorporating preferred options). Although there was some support for this, there were also comments that it should be classed as a Market Town as it has many shops and businesses, a large supermarket, secondary school with sports facilities, and a swimming pool – Somerton does not have many of these yet it is classed as a Market Town in the draft Core Strategy. Comments also stated that the Settlement Role and Function study recommended Langport / Huish Episcopi should be a Market Town.

### *Commentary*

The South Somerset Role and Function Study was commissioned by the Council to identify the role, function and relationships of settlements and their potential future roles and provide recommendations on settlement hierarchy classification to inform decision making on where future growth should be proposed to achieve sustainable future growth within South Somerset. Market town, Rural centre and rural settlement designations indicate differing levels of growth from growth commensurate with maintaining employment and community centres (market towns), to growth for local needs (rural centres) and to little growth unless improved sustainability can clearly be demonstrated (rural settlements). The study has proved an important starting point and evidence base for determining settlements location within the District Settlement hierarchy.

There is general support for market town status for the draft designations except Ansford / Castle Cary and Somerton. The suggestion that Chard should be a primary Market town would require a change to the settlement hierarchy that is not considered justified in terms of any clear difference in role or function of Chard in relation to Yeovil or the other market towns. Whilst Chard is larger than other market towns it has a commensurately higher level of development provision proposed.

In relation to Castle Cary and Somerton the main points raised against their proposed status were lack of jobs, lack of strategic facilities e.g. secondary schools (Somerton) and large supermarkets (both) and lack of sufficient sustainable public transport.

It is not felt that these criticisms for Ansford / Castle Cary and Somerton are well founded in planning terms when taken in the round with all the facilities and criteria in which these towns scored to justify market town status in the original Consultant's report on settlement role and function hence there is no clear evidence given for demotion relating to status. Main concern for Somerton objectors appears more to be the scale of growth.

There is some support for higher status for Langport / Huish Episcopi including job provision and more strategic facility availability although the town council and Huish Episcopi Council are content with its draft rural centre status. A review of evidence clearly shows that the original Housing Requirement for South Somerset and Yeovil

report recommendation for market town status can be substantiated. Langport / Huish Episcopi has what Somerton has in terms of facilities and is close in terms of employment provision and crucially Langport / Huish Episcopi has the higher level facilities (superstore and secondary school). It is clear from the strategic housing land availability assessment that there are sites for development available away from flooding and other constraints (but closer to the town centre than the proposed growth option put forward for Somerton). It is considered that whilst the local communities have expressed a desire for a lower status than market town they clearly wish to maintain the community facilities already available in the settlements. Market town status and a commensurate scale of growth (see below section on Appropriate Growth) are considered to be the mechanism to help ensure that these facilities are maintained.

<b>Recommendation 4:</b>	<i>No change to Market Town status of all the proposed Market Towns (Ansford / Castle Cary, Chard, Crewkerne, Ilminster, Wincanton and Somerton).</i>
	<i>Change Langport and Huish Episcopi's status from Rural Centre to Market Town.</i>

#### Review of Rural Centres' Status

Bruton:	Comments were received in support of Bruton's status as a Rural Centre.
Ilchester:	There were comments both in favour of Ilchester being a Rural Centre, and against.
Martock:	There were no comments specifically on Martock's position as a Rural Centre in the settlement hierarchy.
Milborne Port:	Comments were received in support for Milborne Port's identification as a Rural Centre.
South Petherton:	There were no comments specifically on South Petherton's position as a Rural Centre in the settlement hierarchy.
Stoke sub Hamdon:	There were no comments specifically on Stoke sub Hamdon's position as a Rural Centre in the settlement hierarchy.

#### Commentary

No significant issues have been raised about designations and there has been general support (more concern has been expressed about scale of growth than with actual designations.)

<b>Recommendation 5:</b>	<i>No change to draft rural centres designations (other than the suggested promotion of Langport / Huish Episcopi to Market Town.)</i>
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## 2.4 Distribution of Growth Between Yeovil, Market Towns, Rural Centres and Rural Settlements

### Yeovil

A range of comments was received regarding the scale of development that should be built at Yeovil. Several comments stated that the figure should be increased from the proposed 8,200 dwellings, with suggestions including 9,600 to be consistent with the draft Regional Spatial Strategy approach that 68% of development should be distributed to Strategically Significant Cities or Towns; 9,000 on sustainability grounds; and 5,000 houses should be built at the urban extension. However, there were many comments that the scale of housing proposed at Yeovil was too high. These comments included: there is no requirement for this scale of development as regional targets have been abolished; there is no local support; the proposals will result in infrastructure issues; negative impact on the local environment; the proposed completion rate is optimistic; and Yeovil is taking a disproportionate amount of development relative to its size i.e. it currently has 27% of the population, but is proposed to take 49% of growth.

### Chard

There were comments that the urban extension proposed at Chard is excessive, and the strategic allocation should not be carried forward as it has consistently proven impossible to deliver. Some comments felt that the proposed 2200 housing provision at Chard should be reduced and more directed to Yeovil, whilst others suggested that the scale of housing should be increased at Chard. There were also concerns regarding the impact of the proposed development on the infrastructure in the town e.g. capacity of schools, medical facilities.

### Crewkerne

Several comments felt that more than the 1030 houses suggested should be built at Crewkerne, reflecting its role in the District. However, there was also objection to the scale of proposed development, as it would put too much strain on the roads and services.

### Ilminster

Although some comments accepted the level of development of 530 dwellings, there were more objections due to adverse impact on the character of the town and lack of infrastructure capacity (particularly schools, health facilities, recreation). There is not a need for additional employment given the existing allocations that have remained undeveloped for many years.

### Wincanton

Much concern has been raised at the scale of housing. The existing commitments at New Barns Farm and Deansley Way should be built out first – there is no need for additional housing on top of existing commitments of 700 houses. The proposed level of growth (1050 dwellings) would have a detrimental impact on existing infrastructure such as town centre car parking. There was a wish to see more employment land to balance out the housing in the town.

## Ansford / Castle Cary

Some consultees felt 500 dwellings proposed at Ansford / Castle Cary was about right, but there were several comments objecting as it was too high and concern over school capacity, car parking and traffic. Concerns were also expressed about growth encouraging superstore provision to the detriment of the town. One consultee has offered the prospect of a road linking Torbay Road employment area to Station Rd within the draft Core Strategy Preferred Direction of Growth.

## Somerton

Many consultees felt that 500 dwellings was too high, with particular concerns about the impact on Somerton's historic character, the ability of the narrow roads to cope with additional traffic, and that services, jobs and facilities will not keep pace with housing. Although the provision of employment land was supported, the actual delivery of this was questioned.

## Langport / Huish Episcopi

Some consultees suggested that more housing should be built than the 300 suggested, as flooding does not affect other edge of centre sites. Development of warehouses was not supported due to adverse impact on the road network.

## Bruton

There were concerns about additional residential development (220 houses) given the current lack of community infrastructure. There were also comments that the road, pavement and parking issues at Bruton need to be addressed.

## Ilchester

Some consultees felt that the scale of housing proposed should be higher, around 300 dwellings, consistent with some of the other Rural Centres. However, the significant flood risk, lack of car parking and traffic problems all limit the potential for further development. The Ministry of Defence suggested that up to 180 houses would be required to accommodate service personnel and their families within a 10 mile radius of RNAS Yeovilton.

## Martock

Some concern that an additional 150 dwellings would just lead to more out-commuting and that the proposed 1ha of employment land would not counteract this. Any additional development at Martock should consider the need for an additional, larger food-shopping outlet.

## Milborne Port

Slightly higher levels of housing (350) were suggested for Milborne Port, and parking issues were highlighted as a problem. The lack of indication as to the delivery of the employment land was also an issue.

## South Petherton

Several comments were submitted objecting to no additional homes being identified for South Petherton, as without more housing the settlement will not flourish and continue to

grow, and that it is wrong to blame the poor internal road structure. Some clarification was requested regarding employment land provision.

#### Stoke Sub Hamdon

Some comments were content with the additional 50 dwellings, whilst others felt this should be increased to meet affordable housing need in the village.

#### *Commentary (relating to distribution of growth for all settlements)*

Half the overall housing growth should be in Yeovil to accommodate the 50% job provision in Yeovil, to maintain its economic health and prominence and to ensure that commuting movements into the town are not aggravated. Delivery of this growth can be achieved beyond the 7,300 dw capacity indicated by Bakers report on Housing Requirement for South Somerset and Yeovil due to extra 2 years of growth (an extra 520 dwellings) and the likelihood of a wider base to the urban extension so enabling better market perception and higher development (potentially an extra 1,440 dw over 12 years 2012-2028 as evidenced in the Baker report on Housing Provision for South Somerset and Yeovil).

The existing draft Core Strategy proposed scale of growth for the market town and rural centres generally meets the overall requirement for the Market towns and Rural Settlements. There are however some minor changes proposed including acknowledgement of 2 more years growth of the Chard growth allocation which extends beyond the Plan period. This is anticipated to be running at 120 dw per annum hence an extra 240 dw provision.

Langport / Huish Episcopi's change of status (see above) requires enhanced housing provision. Langport / Huish Episcopi is however considered to be one of the smaller size of Market Town settlement (including also Somerton and Ansford / Castle Cary) that should secure more growth than a rural centre but less than the larger market towns. The smaller scale of smaller settlements and changes to public bus provision point to a smaller provision in the three smallest market town settlements. The proximity of Langport / Huish Episcopi to Somerton and Ansford / Castle Cary to Wincanton mean that when respective growth provisions are combined there is appropriate scale of growth for these settlements. A provision in overall terms of 400 dw each is therefore proposed for Langport / Huish Episcopi, Somerton and Ansford / Castle Cary. Infrastructure concerns at these smaller market towns have been found not to be substantiated or are resolvable by current service providers. Concerns at possible coalescence with Wearne near Langport / Huish Episcopi are legitimate but can, and should, be precluded by policy. Concerns relating to the potential adverse retail impact associated with a larger scale of growth at Castle Cary can, and should, be managed through retail policy including the proposal to have a retail impact assessment for any development of more than 500 sq m (see Locally Derived Retail Threshold policy below).

There is a general point relating to the three smaller Market Towns of Langport / Huish Episcopi, Somerton and Castle Cary that the representatives of the settlements are reluctant to take growth commensurate with their status yet wish to maintain facilities. It is felt that a scale of growth commensurate with their status is necessary to ensure that facilities can be maintained.



To reflect the scale of Wincanton, and allow assimilation of significant growth in the recent past and present, and to have a more permissive approach to employment provision reflecting considerable loss of employment provision in the town in the past, it is proposed to take away the additional provision of 350dw set out in the draft Core Strategy and promote more employment land.

For South Petherton there are a notable body of objections seeking growth to sustain the settlement and evidence presented that road issues associated with access to the A303 can be overcome. It is difficult to sustain an argument for no development over current commitments in the town due to internal road constraints (and this argument is not consistent with the element of growth allowed at Martock which is similarly constrained by internal road issues). It is important to remove reference to internal road constraints limiting Stoke Sub Hamdon's growth for similar consistency arguments. Stoke's more limited scale of growth reflects its scale and nature.

The arguments for a change in growth levels in the remaining Rural Centres were not felt to be sufficient or of merit to require a change to Core Strategy levels.

For the rural settlements below rural centres in the settlement hierarchy, there is clear evidence in Strategic Housing Land Availability Assessment (SHLAA) that there are lots of sites that could come forward in Rural Settlements – it is felt that SHLAA identification can negate the government regulations precluding windfall estimations in Plans which was one of the reasons why increased provision beyond commitment for these settlements was not included in the draft Core Strategy. There is an element of arbitrariness in the assessment of the level of growth policy SS2 will encourage which is inevitable hence there is a need to monitor its implementation. The evidence in the latest Annual Monitoring Report points to a very significant arrest in the provision of additional houses in the Rural Settlements so making a provision figure of around 2,400 dw (i.e. double the current level of commitments for these settlements) a more realistic one than would have been considered a year ago. It is important that rural settlements can grow where sustainability can be achieved but there is also a need for a restriction on the total to ensure that excessive provision doesn't occur and undermine the settlement strategy and hierarchy. This point requires close monitoring that will take place (in any event) through the Council's Annual Monitoring Report.

The PMB sought to determine housing provision in workshop 1 and resolved growth levels for settlements as below:

1. Yeovil to grow by 8,600 dw housing provision.
2. No changes to scale of growth in most market towns and rural centres apart from
3. An extra 240 dwellings at Chard
4. Langport / Huish Episcopi to have increased provision to reflect higher status proposal to 400 dw
5. Somerton and Castle Cary to have scale of growth pared back from 500 to 400 dwellings
6. Wincanton to receive less growth (less 350dwellings) and to have more permissive approach to employment provision
7. South Petherton to take more growth (100 dwellings) given a review of justification of need to restrain its development.
8. Provide for 2,400 dw in the rural settlements to which policy SS2 will apply subject to policy addition seeking regular monitoring and restriction on cumulative total to stop excessive provision undermining the settlement strategy and hierarchy
9. Show additional housing requirement beyond commitments at present in the policy on housing provision policy (draft Core Strategy policy SS4)



The implications of the re appraisal of the District's overall provision in PMB workshop 9 (relating to the update required due to the latest BRES data) meant a reduction on overall provision to be achieved by removing 1,250 dwelling from the previously agreed level of provision. This reduction was to be achieved by removal on a 50:50 basis between Yeovil (625dw) and the rest of the District reflecting the distribution of the sub economy's job provision. 581 dw should be lost at Chard reflecting receipt of the Chard Eastern Development Area Feasibility Report and the consequent expected delay in likely commencement. This leaves little point in looking for reductions elsewhere.

The final provision derived from the bottom up consideration of growth options is in excess of the 15,950 dw requirement. It is considered however in the context of development uncertainties, the aspiration to retain a scale of growth at Yeovil of "an urban extension scale" and in the context of the overall scale of for the District to be in broad agreement with the requirement. It is not necessary or appropriate to be unduly precise.

The PMB sought a clearer expression in the policy SS4 showing levels of housing growth of the additional housing required beyond the current level (at April 2011) of commitments (built or under construction or with planning consent or currently allocated).

The outcome of all these changes is shown in Table 4 below (which is a redrafting of Policy SS4) which presents the draft Core Strategy housing provision by settlement. The table also includes the remaining requirement after commitments to date have been taken into account. This information has been updated to an April 2011 base date. Table 5 below shows this commitment in more detail.

**Recommendation 6:** *That Revised Settlement Policy SS4 set out below and presenting the distribution of housing growth about South Somerset is endorsed.*

*Table 4: POLICY SS4 DELIVERING NEW HOUSING GROWTH*

*Housing requirement will make provision for at least 15,950 dwellings in the plan period 2006 – 2028 of which 7,975 dwellings will be located within or adjacent to Yeovil, including an urban eco town extension of 2,500 dwellings (to be part built out beyond the plan period)*

*This provision will include development and redevelopment within developed areas, greenfield development identified within this strategy or to come forward through strategic housing land availability assessments, conversions of existing buildings, residential mobile homes and development elsewhere in accordance with the policy on development in rural settlements*

*The distribution of development across the settlement hierarchy will be in line with the numbers below (next page):*

**Recommendation 6 continued:**

Table 4: POLICY SS4 DELIVERING NEW HOUSING GROWTH

Settlement	Core Strategy 2006-2028 Total Housing Requirement	Existing Housing Commitments 2006-2011  (as at April 2011)	Additional Housing Provision required (Total Housing Less Existing Commitments)  (as at April 2011)
<b>Strategic Town</b>			
Yeovil	7,975	3,704	4,271 <sup>5</sup>
<b>Market Towns</b>			
Chard	1,861	521	1,340 <sup>6</sup>
Crewkerne	1028	901	127
Ilminster	531	199	332
Wincanton	703	692	11
Somerton	400	235	165
Castle Cary / Ansford	400	127	273
Langport / Huish Episcopi	400	295	105
<b>Rural Centres</b>			
Bruton	217	113	104
Ilchester	151	0	151
Martock	246	101	145
Milborne Port	299	210	89
South Petherton	245	151	94
Stoke Sub Hamdon	55	6	49
<b>Other</b>			
Rural Settlements	2,400	1,267	1,133
<b>Total</b>	<b>16,911*</b>	<b>8,522</b>	<b>8,389</b>

\* 15,950 for the purposes of the overall provision is the District requirement to 2028. The cumulative total of 16,911 is 6% in excess of requirement but is considered in the context of development uncertainties and overall scale of provision, to be in broad agreement with the requirement.

<sup>5</sup> A further 625 dwellings are proposed at the Yeovil Urban Extension post 2028.

<sup>6</sup> A total of 3,237 dwellings are proposed in Chard, of which 1,376 dwellings are proposed at the Chard Growth Area post 2028.

**Table 5: Proposed Settlement Hierarchy and Scale of Housing Growth**

Yeovil's proposed settlement status - Strategic Significant Town (SST)  
Market Towns (MT) and Rural Centres (RC)

	Yeovil	Chard	Crewkerne	Ilminster	Wincanton	Somerton	Langport / Huish Episcopi	Ansford / Castle Cary	Ilchester	South Petherton	Martock	Bruton	Milborne Port	Stoke Sub Hamdon	Rest of South Somerset	Area Total
Settlement Status	SST	MT	MT	MT	MT	MT	MT	MT	RC	RC	RC	RC	RC	RC	N / A	
<b>1. South Somerset Spatial Strategy Requirement (Draft Core Strategy)</b>	7975	1861	1028	531	703	400	400	400	151	245	246	217	299	55	2400	*16911
<b>2. Completions (06 / 11)</b>	1221	370	190	132	238	23	153	38	0	103	52	91	126	5	693	3435
<b>3. Under Construction</b>	28	29	120	8	18	10	12	4	0	6	5	9	19	0	131	399
<b>4. Commitments (Not Started)</b>	2455	122	66	59	436	48	77	55	0	42	44	13	47	1	443	3908
<b>5. Allocated (without permission)</b>	0	0	525	0	0	154	53	30	0	0	0	0	18	0	0	780
<b>6. Total</b>	3704	521	901	199	692	235	295	127	0	151	101	113	210	6	1267	8522
<b>7. Residual Housing Requirement</b>	**4271	1340	127	332	11	165	105	273	151	94	145	104	89	49	1133	8389

\* 15,950 for the purposes of overall provision, is the District requirement to 2028. The cumulative total of 16,911 is 6% in excess of requirement but is considered in the context of development uncertainties and overall scale of provision, to be in broad agreement with the requirement

\*\* Residual additional housing for Yeovil, including an urban extension of 2,500 dwellings, 625 of which will extend beyond the plan period.

## 2.5 Review of Policy SS2 (Development in Rural Settlements) Development Areas and Infilling

The loss of the development areas for so many villages listed in the Local Plan caused much concern, and the resulting uncertainty as to how the Council will determine what is justified and commensurate in any given location. Consultees felt that the 'Rural Settlements' should be identified by name, and existing development areas retained and reviewed. Comments also suggested that a level of development should be attributed to 'Rural Settlements', as it is unrealistic to identify nil additional dwellings. There were several comments stating that affordable housing in isolation cannot increase the sustainability of rural settlements. The inclusion of the 'rural exceptions sites' section made the policy confusing, lengthy and superfluous.

### *Commentary*

Although there may be some uncertainty due to the loss of so many identified 'villages' and development areas, it is considered that Policy SS2 provides a flexible approach that allows appropriate development to be delivered in Rural Settlements. This aims to ensure the development needs of the rural settlements can be met, whilst restricting the scale of such growth to ensure development is concentrated at Yeovil, Market Towns and the Rural Centres. It is considered that no substantive arguments were made requiring a change to policy SS2 however it was accepted that there is a need for such a new and flexible policy approach to be explained further in supporting text to set out what the Local Planning Authority considers is sustainable development and what is appropriate infill and what isn't. This text was subsequently set out for PMB endorsement and the endorsed text is set out in Appendix F.

There is clearly some confusion in its wording in relation to exception sites that needs to be addressed. Furthermore once it is accepted that cross subsidy of affordable housing with market housing on the same site can occur then the rationale for exception sites fades and reference to exception sites should be removed. It should be made clearer that the policy allows a mix of market and affordable housing.

It is also accepted that a higher provision figure should be put forward for SS2 settlements in order to reflect the potential for additional housing development that the policy affords. The higher provision expectation rather obviates the need for a new tier of settlement as advocated by some representations and the flexibility within the policy means that an infilling policy becomes unnecessary, nor appropriate as a restraint on wider development management nor practical given the scale of work involved reviewing development areas (which furthermore would be inappropriate and difficult to justify in a strategic document such as the Core Strategy.)

It was felt that there had been no credible evidence for upgrading of settlements from Rural Settlement to Rural Centre. The closest argument being for Templecombe's upgrading but the previous Local Plan Inspector was dismissive of the argument and whilst there is the prospect of more jobs in the settlement in all other respects there are no enhancements of services and facilities since 2003 to justify upgrade. The vulnerability of Templecombe's job provision in that it is vested largely in 1 employer was also a relevant factor counting against its upgrading.

<b>Recommendation 7:</b>	<i>Retain policy SS2 but remove the exception site policy subsumed within it.</i>
	<i>Endorse the further explanation as to what is justified and</i>

*commensurate in any given location, including further guidance / explanation as to how a development can be considered to increase the sustainability of a settlement set out in Appendix F.*

*Recognise that settlements below Rural Centre are a tier of the settlement hierarchy in their own right to be called rural settlements (to which policy SS2 applies).*

*Recognise that policy SS2 will allow for infilling where justified in sustainability terms and cross subsidisation of affordable housing within Rural Settlements.*

*Do not re-instigate Development Areas for Rural Settlements.*

*Do not add any additional rural settlements to Rural Centre status.*

### **3. Strategic Development Proposed For Settlements**

#### **3.1 Yeovil – Direction for development – the Yeovil Urban extension**

The Yeovil Urban Extension Policy YV2 received the largest number of individual responses having received 529 comments, the vast majority criticising the Yeovil Sustainability Appraisal and the preferred direction for growth. A further 15 comments specifically challenged the Brownfield / Greenfield split set out in Policy YV1. The Yeovil Urban Village (Policy YV3) was less contentious and received 8 comments. The top line issues raised were as below.

- Disagree with Sustainability Appraisal of Southern option.
  - Access to town centre / employment sites / train stations
  - Impact on landscape / historic environment
  - Loss of grade 1 agricultural land / biodiversity
  - Topographical barriers
  - Floodplain
- There is insufficient infrastructure to accommodate the Urban Extension
  - Hospitals / primary schools / sewage / parking
- Capacity on existing brownfield sites to accommodate required growth
- Agusta Westland proposes a Flight Safety Zone to protect their operations
- Disagree with population forecast for the District and Yeovil
- Insufficient transport evidence
- Highways Agency support southern option subject to detailed Cartgate testing
- Northwest option has not been accurately appraised
- A single direction for growth restricts build rates

The location of growth for Yeovil was undertaken by the PMB over two workshops after request for more work following the first. A decision making logic was identified within which the issues raised by representees were to be addressed. This changed slightly between workshops but in the final analysis the following process for decision making below was pursued.

In the course of establishing an indicative site for the urban extension it was recognised that to avoid co-alescence of the nearby settlements of North Coker and East Coker and for the further protection of the historic and natural environment a buffer zone was required. Two further PMB Workshops specifically addressed this matter leading to proposals for designation of an East Coker and North Coker Buffer Zone. This matter is expanded on in the relevant section below.

#### **Yeovil Urban Extension – Decision making process**

- Scale of growth for Yeovil
- Potential Land available for development within the urban form
- Size of Potential Urban extension
- Urban extension potential land take
- Constraints mapping analysis
- Further Consideration of northern option for development
- Advantages of scale – one urban extension or several
- Wider planning issues: sustainability appraisal of options

- Initial siting (masterplanning ) of urban extension
- Buffer Zone for East Coker and North Coker
- Traffic modelling and its implications
- Implications of Infrastructure Delivery Plan
- Review of Eco town standards

Whilst each stage of the decision making process dealing with the Yeovil Direction for Growth – Yeovil Urban Extension ends with a conclusion, several of these and in particular sections 4 – 7 are conclusions moving towards a final recommendation on the location for growth and as such are means to an end rather than recommendations to present to members in their own right.

The sections on Traffic modelling and the Infrastructure Delivery Plan were effectively reviews of the emerging recommendation on the direction of growth for the Yeovil Urban Extension as these reports emerged later in the day and the decisions taken by that date were re-appraised against the contents of these reports.

### Yeovil's Scale of Growth

The Baker Associates report on Housing Requirement for South Somerset and Yeovil identified a provision to 2026 of 16,000 dw (now updated to 2028 and 14,950 dw) and presented a rationale that 50% (now 7,975 dw) of this growth should be in Yeovil within the Plan period.. This was an economic led recommendation relating to the growth of South Somerset and Yeovil and sought to maintain the current high level of self-containment of the town. A recommendation to this effect was made in the first PMB workshop in the context of a review of growth in all settlements. The PMB sought a clearer explanation of why growth for Yeovil is needed as part of a stronger Vision Statement for the town.

A sustainability appraisal of the overall scale of growth going to Yeovil in relation to the rest of the District was undertaken and the 50 / 50 split for development was compared with a 25 / 75 split in favour of Yeovil and a 25 / 75 split in favour of the market towns and other settlements and a 37 / 63 split in favour of Yeovil. This concluded that a greater concentration of development in Yeovil would cause environmental issues for the town and outreach the Yeovil town job creation expectation whilst causing service retention issues elsewhere in the District. Greater concentration elsewhere in the District would be at the expense of regeneration potential for Yeovil town and would have potentially adverse impact on the character of the wider rural area and would be less sustainable in terms of trip to work issues. The PMB concluded to retain the 50 / 50 split for development

<b>Recommendation 8:</b>	<i>Confirm the 7,975 dwelling housing provision for Yeovil to 2028 in the context of a stronger clearer justification for the role of growth in the Vision statement for the town. Amend policy YV 1 accordingly.</i>
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### Potential Land Availability within the Urban Framework

An assessment of the likely development within the Urban Framework has been made on the basis of completions, commitments as at April 2010, Strategic Housing Land Availability Assessment sites and an estimate of windfall provision post 2022



(Government guidance precludes consideration of windfall provision for the first ten years of a plan) and an estimate of provision from flats above shops. This is set out in tabular form below.

**Table 6 Potential Dwelling Provision within Yeovil Urban Framework**

	Achievable Capacity	Theoretical Potential (windfall at 58dw / ha)	Approved	Potential / Allocated
Completions	726	726		
Commitments	2906	2906		
Key sites				
KS / BRYM / 1	97	97	620 commitments	717
KS / YEWI / 1	150	150	*636 commitments	**786
KS / YEWI / 2			830 commitments	830
Yeovil Urban Village	196	278		
SHLAA sites	257	724		
Potential windfall sites 2022 - 2028	1200	1200		
Flats above shops and conversion of houses (Urban Capacity Study)	61	61		
<b>Total</b>	<b>5593</b>	<b>6058</b>		

The difference between the two figures in table 6 relates to a decision on whether the SHLAA sites identified by the Panel of Developers and other parties as suitable, available and viable is the appropriate figure. Alternately the figure of all sites put forward regardless of suitability, availability or deliverability could be used (the higher figure) on a presumption that over the period to 2028 obstacles will be overcome or that other sites may come forward. A higher figure was considered to be the more appropriate.

**Recommendation 9:** *Endorse a Yeovil urban capacity of 6,100 dw and amend policies YV1 and 2 accordingly*

#### Size of potential Urban Extension

At the time the Yeovil Urban Extension was being actively considered by PMB the agreed scale for District Growth was 17,200 dw and 8,600dw for Yeovil. The subsequent proposed reduction in overall District provision to 14,950 dw and 7,975 dw for Yeovil implied therefore a smaller urban extension of 1,875 dw. The scale of the extension was considered by PMB when determining the smaller overall scale of development for South Somerset and for Yeovil. It was considered appropriate to retain the scale of the extension to 2,500 dw and anticipate its build up being completed beyond the plan period

for a number of reasons. In particular:

- consistency with the approach adopted at Chard for the strategic allocation
- delivery of economies of scale
- enable a more sustainable community being developed with potentially more services
- provide for more certainty for the future for the development proposals for the south and west of Yeovil by providing for its natural expansion to the perceived (and in the case of East and North Coker the actual policy) constraints to further expansion.

**Recommendation 10:** *Endorse a total provision for the Urban extension of 2,500dw (with 625 dw to be developed beyond the plan period) and amend policies YV1 and 2 accordingly*

#### Urban Extension Potential Land Take

Land take for the Urban Extension is identified in the following table and is derived from assumptions about housing density, employment land provision and expected figures for associated land uses. The key decision to make is what is the appropriate density of an urban extension. It is considered that the range of 40 to 50 dw per ha set out in the original RSS document is appropriate reflecting recent experience elsewhere in developing urban extension of quality design. All other numbers for land take table reflect the smaller 2,500 dwelling size of the Urban Extension and the one density figure at 45 dw per ha.

Attention is drawn to high open space provision reflecting eco-town aspirations and the high amount of strategic landscaping to buffer development from existing settlements.

**Table 7 Potential Land Take of a Yeovil Urban extension**

Land type	Land take for 2,500 dw in ha
Housing at 45 dw ph	55.5
Employment (B uses) 1 job per economic active house=hold	13.5*
Education (1 sec and 1 primary school)	7.5
Health Centre	0.4
Local Centre	1.0
Energy Centre	0.2
Strategic roads (5% of housing / employment built form	3.4
<b>Total built form</b>	<b>81.5</b>
Strategic landscaping (25% of housing / employment built form)	20.3
Open space (40% of all land types excluding road and structural landscaping)	31.2
<b>Total Land Take</b>	<b>133.0</b>

- land take figure for employment uses now finalised at 11.5 ha

The extent to which structural landscaping and open space requirements will duplicate one another will be a matter for subsequent master planning. The figures above are therefore maximum figures and likely to be less in reality.

The PMB concluded that they would wish to endorse average density of 45 dw per ha in overall terms and a land take figure of 133ha and use to help determine potential options for the Urban Extension by ensuring locations have sufficient land in principle to accommodate the extension.

### Constraints Mapping Analysis

Consideration of constraints has previously been considered within the draft Core Strategy Sustainability Appraisal however it was considered worth re-visiting as a separate exercise to assist firstly as a more expansive geographical basis for decision making and secondly to confirm a satisfactory site can be found in the strategic location to be preferred for the Urban Extension.

Constraints mapping analysis has five stages of site identification. The first stage considers all constraints and gives them equal weighting but fails to identify sufficient land to accommodate development due to the high level of constraints around Yeovil. The constraints considered were:

- Protection of Agricultural Land (Grade 1, 2 & 3)
- Protection against Flooding (Flood Zones 2 & 3)
- Protection of the Historic Environment (Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and Historic Parks & Gardens)
- Protection of Village Identity (East Coker, West Coker, Barwick & Stoford or Bradford Abbas, Chilthorne Domer, Thorne Coffin, Yeovil Marsh, Mudford, Over Compton & Odcombe)
- Protection of the Agusta Westlands Flight Path
- Protection of Environmental Designations (Local Wildlife Sites, SSSIs)
- Protection of Landscape Character (Northern and Southern Escarpments)

A second stage is therefore required to prioritise constraints to deliver strategic land for development on the basis of the primacy of securing development for Yeovil. A decision is then considered appropriate not to apply lower priority constraints. Furthermore as these lower priority constraints are land extensive their removal as an inhibition to growth is expected to expose sites.

On this basis, stage 3 requires the removal of agricultural land and landscape constraints and 3 general areas with potential for development present themselves, North West, South West and an option to the north of Yeovil. These are shown in appendix G1. The northern option was discounted on the basis of remoteness and disconnection from Yeovil.

The downgrading of some constraints has produced a third multi site option. Whilst earlier analysis describes presents strong arguments against such an option it is felt appropriate to consider at this stage as the achievement of 2 options has already required compromise on constraints. This multi site option is contained on five sites and is shown in appendix G2 and is to be assessed against other options in principal, should the multi-option be put forward then an additional planning exercise will be required to establish the appropriate site for development and relevant land uses on individual sites to ensure sustainable Urban Extension will be realised. This would entail the requirement

for joint working with West Dorset. This will have significant time implications for the Core Strategy. The multi optional constraint like the other two does require compromising land on which landscape and agricultural land constraints exist.

The PMB concluded that the focus of further review of the proper location for the urban extension be a site to the north and west of the town and one to the south and west incorporating parts of the Council's preferred option and its Brympton and Coker area of search in the draft Core Strategy.

Further consideration of northern option for development

Members of the PMB expressed a desire to review the removal of the Northern Option around Yeovil Marsh. The original justification presented to Workshop 3 of the PMB stated that:

*'Given the steep topography of the northern escarpment it would still seem prudent to locate any development at the foot of this hill to avoid the worst of the effects on the landscape. In avoiding the steepest points of the hillside, it could be argued that development is no longer technically contiguous with Yeovil although open space and strategic landscaping could be suitable in these locations. It is considered that the discontinuity to Yeovil, distance and proximity to the A303 make this site effectively a form of new settlement which is considered inappropriate for all forms of reasons focussed principally on lack of sustainability.'*

A re-appraisal to provide a more robust set of evidence as to why a direct Northern direction of growth was provided.

The PMB concluded that the northern option (due north of Yeovil and to north of Yeovil Marsh) for the urban extension initial dismissal be confirmed

Advantages of scale; one extension or several

The advantages of scale and one over several sites were presented in detail to Members of the Project Management Board to decide whether 1 urban extension or several multi sites should be pursued. Assessment undertaken of the relative merits demonstrates the case for one Urban Extension. The key benefits were considered to be: -

- Better access for residents to jobs and facilities
- better CO2 reduction performance and cheaper energy
- more sustainable transport
- and potentially a cheaper overall cost for development

The PMB concluded to endorse preference for one site over a multi-site option.

Wider Planning Issues: Sustainability Appraisal of Options

An assessment of the 3 emerging options above against the Sustainability Assessment objectives, derived from the Sustainable Community Strategy, presents a clear case for determining a preferred location for growth. Key determining factors relate to accessibility to services, effects of traffic (traffic congestion) and reducing the contribution to climate change (renewable energy opportunities).

Additional considerations relate to infrastructure and development costs of options,

market capacity and ability to deliver the required dwellings on the urban extension up to 2028 and land availability in terms of landowner and developer intent.

The outcome of the Sustainability Appraisal presented to PMB (workshop 3) is a firm recommendation to develop the South and West Option because it:

- is more accessible and gives better opportunities for sustainable transport
- presents opportunities to rationalise education facilities across the town
- is accessible to employment opportunities
- provides the opportunity for more walking and cycling compared with car use and the cost of known traffic infrastructure is less (although the disbenefits of the Option to the North West are less than previously thought following a re working of the Parson Brinckerhoff traffic modelling)
- better environmental impact than the north west option but only if impacts on neighbouring villages are seriously mitigated and the large-scale open space proposals on the site are used to beneficial effect in this regard.
- Better opportunity to introduce combined heat and power technology and contribute to CO2 minimisation.

The third option of several sites does not perform well in the Sustainability Appraisal and furthermore raises the prospect, if chosen, of additional work not previously required to establish that sustainable communities can be delivered on 2 or up to 5 sites.

It is considered that the South and West Option can deliver the required urban extension provision within the plan period to 2028, and there is evidence of substantive landowner and developer interest in the South and West option (and more so than in the North West option).

**Recommendation 11:** *Endorse South and West Option as the location of the urban extension subject to final confirmation following consideration of traffic impact derived from all traffic assessment reports and infrastructure costs after review of the Infrastructure Delivery Plan. Amend policy YV2 accordingly*

#### Initial Siting (masterplanning) of Urban Extension

In accord with the Project Management Board wishes an attempt has been made to site a potential urban extension to the south and west of Yeovil through a rudimentary master planning exercise to see if the amount of land required can reasonably be located. The Conservation Architect and Landscape Architect have undertaken this in support of Spatial Policy officers and for both a 2,500 dw and 3,000 dw extension. The outcome of this work for the eventually identified scale of 2,500 dwellings is set out in the plan attached to this report in appendix H that show both the potential development area and the appropriate limit to development and buffer area for the settlements of East Coker and North Coker.

The main implication is that an urban extension of 2,500 dw and associated employment and other land uses can be accommodated within the south and west quadrant of Yeovil (an amalgamation of parts of the draft Core Strategy Preferred Option of East Coker, Keyford and Barwick and the Brympton and Coker option to the south west). The

accommodation is possible without impinging on key local landmarks and constraints and without adversely affecting the overall setting of East Coker.

The initial siting exercise can only be used in an indicative way as the Core Strategy is seeking to establish a direction of growth not a strategic allocation however the boundary of built form and the broad clarification of direction of growth enables a refined direction of growth to be drawn on the Yeovil Insert the Proposals map. Whilst not part of the main masterplan area an area of land adjacent the Watercombe Lane and A30 junction was recognised in early masterplan work to have development potential and is shown as part of the Direction of growth.

**Recommendation 12:** *Endorse amended proposals map for Yeovil showing a revised direction of growth for the Yeovil Urban extension to the South and West of Yeovil (as shown on the amended plan in the map section)*

#### Buffer Zone for East Coker and North Coker

The PMB in considering the urban extension and the appropriate location for it took the view that in order to prevent co-alescence and preserve the character of the settlements of North and East Coker a buffer zone would be required to be defined. This would need to be justified and with an appropriate supporting policy and supporting text expanding on the justification. This conclusion was the subject of further consideration by PMB in two workshops (9 and 10). The upshot of these was a recognition that the purpose of the East Coker and North Coker Buffer Zone is to provide a defined boundary to Yeovil's growth to the south and west of the urban extension to prevent the coalescence of the village of North Coker and part of East Coker and protect the historic environment in this location.

The 'East Coker & North Coker Buffer Zone' will act as a definitive boundary to development providing the community with reassurance that key landscape and historic features beyond this edge are protected and will not be compromised. The 'East Coker & North Coker Buffer Zone' should not be considered an area of constraint to all development as landscaping / green infrastructure proposals can benefit the natural environment and setting of nearby villages and should be encouraged where appropriate. Similarly all existing dwellings within the 'Buffer Zone' will retain their permitted development rights.

The proposed 'East Coker & North Coker Buffer Zone' seeks to perform the role of a strategic gap, which is to:

- Protect the setting and separate identity of these settlements, and to avoid coalescence;
- Retain the existing settlement pattern by maintaining the openness of the land; and
- Retain the physical and psychological benefits of having open land near to where people live.

A specific area shown on plan (appendix I) was endorsed by the PMB with clarification that 40% of land within the developable area be Greenfield and clarification that the identified built development edge was the limit to built development southwards and



westwards. The buffer zone goes further in moving the limit to development eastwards and northwards than the original masterplan reflecting site specific matters.

**Recommendation 13:** *That the East Coker and North Coker Buffer Zone as shown in appendix I and on the Yeovil Proposals Inset Plan be endorsed and a new policy be presented.*

### Traffic Modelling and its implications

A draft of the 3<sup>rd</sup> version of the Yeovil transport modelling study (produced by the consultants 'Parsons Brinckerhoff') was presented to Area South and all Members on October 13<sup>th</sup> 2011, and the final report was published in January 2012. This study has assessed 10 different options for the proposed Yeovil urban extension. In addition, a 'Highways Infrastructure Requirements for Yeovil urban extensions' report has been produced that assesses the preliminary cost estimates of the various options for the proposed Yeovil urban extension.

On the basis of these reports, the potential impact on the highway network of the different options for Yeovil's urban extension can be summarised as below:

- There is generally limited difference between the options and so the traffic impact in considering the location of the urban extension is not as great as was previously thought. The 3<sup>rd</sup> study shows that background traffic growth (from growth in car use and growth in the size of Yeovil) is the main contributor to deterioration of the highway network performance.
- The successful implementation of sustainable travel at any location would mean less impact on the road network.
- All option locations have similar levels of traffic impacts across the whole Yeovil road network, but would cause some localised impacts in the vicinity of the location in question.
- Whilst the North West option has a similar traffic impact as the South and West option in general, 'eco town' standards (50% of travel by non-car means) cannot realistically be achieved in the NW and without these standards the option is less favoured. There is a likelihood of an increase in car-based travel if the NW option is pursued due to its relative remoteness (around 6km from the town centre), there are no bus routes near or adjacent the site, and it is poorly connected to walking and cycling infrastructure.
- Location options in the south of Yeovil are the only areas that are considered to have the potential to provide realistic opportunities for non-car based travel, due to being relatively close to the town centre (approx 2km), and the relatively flat terrain within the site will help to encourage walking / cycling (although it is recognised that Hendford Hill is a discouragement for such links to the town centre).
- The reduced scale urban extension development has greater transport impacts than the larger scale development in similar areas south of Yeovil, despite the overall level of development at Yeovil being the same for all option and scenario tests. This finding is of value as it shows that concentrating the development would have merits in transport terms.
- The Highways Agency have indicated that they would have *"significant and serious concerns about a proposal for direct access on to the A3088 Cartgate link because of its potential to have direct and detrimental impact on the operation of Cartgate Roundabout and traffic flows on the A303 on this part of the network."* In previous



consultation, the Highways Agency have stated that Yeovil's urban extension should be located as far away from the A303 as practicable, and supported the southern option for the urban extension in principle subject to the emergence of more detailed proposals.

- In terms of provisional cost estimates of strategic highways infrastructure, the South option is cheapest at £2m whilst the NW option incorporating a link onto the A3088 is most costly at £9.4m. The NW option without the link would be £7m (although Somerset County Council have indicated that such a major amount of development solely to be accessed off Thorne Lane would not be acceptable).
- All the various options can be accommodated by the Cartgate Roundabout, and do not indicate a major cost implication in terms of the scale of growth envisaged for the Yeovil area, although this may need to be verified by further work subsequent to the decision on the urban extension.
- There will be a noticeable adverse local traffic impact on Hendford Hill and Watercombe Lane from an urban extension to the south and west. There will be a similar adverse impact on Western Avenue should a north west option for growth be decided upon. Mitigation of such local impact is more realisable in relation to the development to the south and west of Yeovil rather than to the north and west.
- The traffic model assumes the improvement works proposed for the Western Avenue are completed by 2026. There is a risk that this will not be the case with a resultant increase in traffic load on Western Avenue should the Urban Extension be located to the North West.

Overall, given the baseline congestion that is forecast by 2026, there will be a general requirement for traffic demand management measures and highway infrastructure improvements across Yeovil whichever option is chosen, with several key junctions requiring attention as demand exceeds capacity leading to queues and delays. In this regard, the emerging preferred option to the south of Yeovil, which is capable of achieving eco town travel standards, is considered better in traffic terms than those other options where eco standards cannot reasonably be achieved (including options to the north west).

**Recommendation 14:** *Retain South and West option for the location of an urban extension as it has the best potential to achieve sustainable travel aspirations, and a much lower estimated provisional cost of strategic highways infrastructure.*

#### Implications of Infrastructure Delivery Plan

Opportunity has been taken within the context of the IDP to cost the infrastructure required for the preferred option for the urban extension against an emerging option to the north west of the town (from both the constraints mapping exercise and the representations received). The findings of the IDP were that

*“7.8 We have considered the different costs of the southern and northern urban extension locations. This is within the context of the separate sustainability appraisal undertaken by the Council, which has already indicated that the southern option is preferable.*

*There are a number of infrastructure items included within the schedule that are applicable to either of the urban extension locations, particularly the requirements for social and community infrastructure (which will include the new secondary school), and the green infrastructure requirement.*

- The differences in the costs relate to the different physical infrastructure required, with more requirements in the northern location (total £53.9m compared to £47.4m for the southern urban extension).*
- The net effect is that on the basis of the infrastructure requirement identified to date, the northern urban extension is more expensive to deliver than the southern urban extension.*

*7.9 The study has identified that the direct costs of the urban extension have a significant impact on its development viability, but that this can be addressed to ensure delivery. The overall cost of the Council's southern option is cheaper and this has therefore been included within the schedule. "*

**Recommendation 15:** *Retain the preferred option location to the south and west of Yeovil as the location for the urban extension.*

#### Review of Eco Town Status

It is felt that the Government's review of the Code 6 Zero Carbon Standard for dwellings is less onerous and cheaper to deliver standard and moves the goalpost and that there is little rationale in providing more aggressive standards in the urban extension which would be at a cost to occupiers and developers alike. However all other outputs of the Eco Town should be pursued and specifically:

- 40% greenspace – an aspiration in keeping with the Yeovil Vision and the high quality urban edge landscape of Yeovil.*
- A minimum of 30% affordable housing – the Council's target is 35%.*
- More options for non-car travel (50% of trips should be non-car) – the high usage levels of traffic on Yeovil's roads throughout the network point to retention of this standard to enable maximum development and development benefits at minimum adverse traffic impact.*
- 1 job per household provided on site – this enables a new sustainable community less controlled by the need to use the car.*
- Homes accessible to public transport – the need to promote viable public transport in Yeovil is clear.*

**Recommendation 16:** *Maintain aspirations to achieve Eco Town Standards in the urban extension with the exception of construction standards beyond the Government's newly proposed Code and present these in the Core Strategy in the light of the Government's intended withdrawal of current eco town guidance.*

### 3.2 Market Towns - Direction for development

Having established the status and scale of growth for Yeovil and the Market towns the Core Strategy seeks for Yeovil (see above) and the market towns only to establish strategic directions for growth and in the case of Chard, where further work has been undertaken by Consultants, an actual strategic allocation. The representations on directions of growth are considered below

#### 3.2a Chard - Direction for development

The Draft Core Strategy considered four options for the future growth of Chard based on the Chard Regeneration Plan;

- Option 1 - Town Centre Regeneration,
- Option 2 - Eastern Growth Area (part),
- Option 3 - Eastern Growth Area (Full Build Out),
- Option 4 - Growth to Natural Limits.

Option 3 was chosen as the preferred option. Policy CV1 therefore allocates land at Chard for a strategic allocation to be delivered within the plan period and beyond including approximately 3207 dwellings, approximately 17.14 hectares of employment land, 2 new primary schools, 4 neighbourhood centres, highway infrastructure and improvements and sport and open space provision. Policy CV2 identifies that 2191 of those dwellings, 13 hectares of employment land, 1 new primary school, 2 neighbourhood centres and sports and open space provision will be delivered within the plan period with the remainder coming forward later. To ensure that infrastructure is delivered to support growth, development phases are expected to be delivered in the order set out in the Chard Implementation Plan. Any deviation those phases should be justified and it should be demonstrated that the proposal will not compromise delivery of the total growth.

Key issues to arise out of the consultation process surround the deliverability of the strategic allocation, impact on the highway network and the non-inclusion of land at Mount Hindrance and Snowdon Farm in the preferred Option.

#### *Commentary*

The Council has sought specific advice and expertise to assist in facilitating the delivery of the strategic allocation. A Delivery Team headed by the Economic Development Manger was set up and a market brief prepared to invite 'expressions of interest' from appropriate developers together with a request for Specialist Economic Regeneration advice to ensure that the implementation of the Chard Eastern Development Area. Consultant's Thomas Lister were appointed.

In relation to the Chard Eastern Development Area both the Chard Regeneration Plan and Implementation Plan show how the roads within the strategic allocation could be set out and delivered in a phased approach that would minimise the impact on traffic flows within the rest of the town. The key driver of the phasing is the need to incrementally increase the capacity of the highways infrastructure to accommodate increased traffic as the town grows, in particular to relieve the Convent Signals Junction (Furnham Road / Fore Street / East Street). The phasing scheme suggested by LDA seeks to bring forward development in a number of phases in which the need for major upfront investment is minimised and, where possible, positive cash flow is maintained.

It is considered that the LDA Consultant's work and that of the Chard Project Board establishes overall viability and a governance framework to address implementation concerns in the long term. The key to delivery is seen to be commencement of Phase II of the allocation identified by LDA Consultants for some 446 dwellings, 1.24 ha of employment land, 0.43ha of retail and a link road between the A 30 and Millfield Lane. Thomas Lister consultants, working to the ED Manager and the Chard delivery officer team have sought to bring forward definite proposals for phase II with developers and landowners.

The Consultants have produced a Feasibility Report dated January 2012 and this is appended as Appendix J to this report. The key findings of the Feasibility Report are set out below:

1. The principle of SCC and SSDC seeking to deliver the Millfield Link, through acquisition of those interests necessary to provide the highways infrastructure. Identification of those enabling powers to be adopted would determine the lead partner.
2. Detailed research and investigations be carried out to confirm the viability and anticipated costs associated with construction of the Millfield Link in the location and design as identified in the CRF or some alternative suitable location.
3. Ensure that budgetary provision is made to procure an Environmental Impact Assessment, Acquire Land and Property Interests, Obtain Planning Consent and Procure Construction of the highways infrastructure.
4. The principle of utilising those funding mechanisms available to offset initial expenditure, considered most likely to be in the form of CIL contributions but with other sources potentially identified.
5. Seek to progress land acquisitions through negotiated settlements.
6. Seek to progress acquisition through the Compulsory Acquisition process in the event that negotiated settlements are not achievable within a reasonable timescale.

In short and in the absence of private sector take up over a number of years the Consultants advocate intervention by South Somerset District Council in order to make things happen and this would be by way of CPO proceedings.

This report was considered by the PMB which itself concluded on the feasibility work as follows:

1. That the CEDA be affirmed by virtue of an appropriate mechanism for delivery being established by the Feasibility Report.
2. Note that the use of CPO powers may need to be considered to ensure the delivery of the Millfield Link road in Chard with further details to be presented once the Core Strategy Examination Inspector's report has been received.
3. That the resources (financial and officer resources) required as part of any consideration of the use of CPO powers (as outlined in 2 above) are fully costed and considered as part of the Medium Term Financial plan process in close co-operation with the Council's Solicitor.
4. Negotiations to continue with prospective developers of Phase 2 to secure an agreed private sector development.

In conclusion it was considered that a clear and workable mechanism to deliver the key immediate phase of the Chard strategic allocation has been established and in

recognition that there are risks in this a risk mitigation strategy is also proposed. It is considered that the Chard strategic allocation can be delivered if necessary through Council intervention and as such should be supported by virtue of the local support it has received and the benefits that it brings to Chard.

The prospect of delay whilst a Core Strategy is progressed to adoption and the potential CPO proceedings required would mean that the housing trajectory for Chard should be amended with an anticipated delay in construction to 2016 commencement. This would result in the prospective delivery of dwellings for Chard in the Plan period being 1,861 including 521 dw already committed with a further 1,376 dw post 2028.

Whilst it is understood that the owner / promoters of the land at both Snowdon Farm and Mount Hindrance would want their land to be included within the growth proposals for Chard the combination of land use and phasing set of in the Implementation Plan has been designed with deliverability and viability in mind whilst trying to achieve the objective of delivering the Chard Vision. Neither respondent has demonstrated how their proposal will integrate with the rest of the growth proposals for Chard thereby putting at potential jeopardy the achievement of the wider vision and growth potential of the town.

The Sustainability Appraisal process showed that growth Option 3 presents the benefits of large scale of growth without the emerging disbenefits of undue traffic congestion and pollution

It has been noted that the ‘no development area’ around Holyrood School does not reflect the proposal of the Chard Regeneration plan, i.e. to relocate the football club to the north. Therefore, it is considered appropriate to amend the notation for the ‘no development area’ by deleting the existing Chard Town Football Club thus mirroring the Chard Regeneration Plan.

<p><b>Recommendation 17:</b></p>	<p><i>Retain Option 3 presented in the Draft Core Strategy strategic allocation as a deliverable allocation.</i></p> <p><i>Endorse the findings of the Chard Eastern Development Area Feasibility Report including the principle that CPO powers should be considered to ensure the delivery of the Millfield Link road in Chard. This will be subject to a further report including any financial proposals, which will come forward once the Core Strategy Examination Inspector’s report has been received).</i></p>
	<p><i>Amend the anticipated dwelling completion in the plan period for Chard to 1,861 dw (with a further 1,376 post plan period)</i></p>
	<p><i>Amend no development area around Holyrood school to reflect Chard Regeneration Plan (as shown on the amended plans in map section).</i></p>

### 3.2b Crewkerne – Direction for development

Provision is made in the draft Core Strategy for 1028 dwellings in Crewkerne to 2028, of these 1028 dwellings, 901 are already committed, including 525 which are part of the saved Local Plan allocation (CLR). This site received a resolution to grant planning

permission subject to completion of the section 106 planning agreement at Area West Committee on 14<sup>th</sup> December 2011 where the heads of terms of the agreement were also agreed. The additional 127 dwellings are considered deliverable through the Development Management process. Consequently unlike the other Market Towns, there is no new direction of growth to be identified for Crewkerne, as the location of the 'growth' has been predetermined by the planning permission resolution. This growth option has been reviewed and considered appropriate to retain as the preferred location for development.

Concerns were raised over the housing growth for Crewkerne, in that it relies largely on saved allocations. The objectors feel this is unnecessarily inflexible and would fail to be justified, effective and consistent with national policy tests of soundness. The objectors consider that it would be more appropriate to identify an additional larger housing requirement over and above commitments, to allow for a more responsive and flexible housing supply.

### *Commentary*

The allocated site in eastern Crewkerne is a strategically significant allocation and is safeguarded as a residential key site under draft Policy HG1: Strategic Housing Sites. Area West committee have now made a resolution to grant planning permission subject to completion of the section 106 planning agreement.

Given that the allocation has been reappraised and planning permission given subject to final agreement on the section 106 agreement, it would be inappropriate to identify alternative land for significant growth in Crewkerne whilst the current application is being negotiated upon to secure appropriate section 106 contributions. A new direction of growth is therefore not needed and it is considered that the additional plus dwellings can come forward through the Development Management process, which has delivered, on average 50 dwellings per annum in the past (2004-2009).

In conclusion, given the commitment to the saved allocated site and the anticipated successful conclusions to negotiations on Section 106, no change is suggested to the proposed direction of growth for Crewkerne.

**Recommendation 18:** *No change to Policy HG1: Strategic Housing Sites in terms of Crewkerne (safeguarding the saved Local Plan allocation KS / CREW / 1).*

### 3.2c Ilminster – Direction for development

Three directions of growth were sustainably appraised to identify a preferred direction of growth for the suggested 332 new dwellings to be delivered in Ilminster over the Plan Period. These directions were:

- Option 1 - South East (Shudrick Lane)
- Option 2 - South West (Canal Way)
- Option 3 - North

The preferred direction of growth, following the sustainability appraisal, identified in the Core Strategy was Option 2, the South West, however, following receipt of the



consultation responses, it is clear that Ilminster Town Council favour Option 1 (Shudrick Lane), over Option 2 (Canal Way).

### *Commentary*

When the direction of growth was previously considered through the Sustainability Appraisal Option 2 was preferred. The logic for this was based on the assumption that one comprehensive development may be able to 'afford' to deliver better community infrastructure than two schemes, and given the Town Council's desire to obtain much needed community infrastructure, this was considered to be a very influential factor.

Since the Sustainability Appraisal was undertaken, the Council has tasked consultants to explore the options for and against moving to a Community Infrastructure Levy (CIL) to deliver infrastructure. The recommendation in this respect is to move to a CIL (see below) and therefore the argument for one comprehensive residential development to deliver infrastructure, as opposed to a number of smaller schemes, combined delivering the 332 dwellings, is removed.

In considering the direction of growth further, issues have been raised regarding highways and viability. W S Atkins have been appointed to undertake an assessment of the capacity of the highway network to accommodate residential development at Shudrick Lane, and have indicated that the site can be reasonably accessed without undue impact on the road network nor requiring major off site works. Baker Associates have appraised the viability of the site as part of their CIL Evidence Base market assessments and the site appears to be viable.

Given the finely balanced nature of the Sustainability Appraisal in respects of Options 1 and 2, the potential changes that may be introduced through adoption of CIL, the support of the town council and the expectation that the south east option could meet the total housing requirement for the town it is considered that the preferred direction of growth for Ilminster be revised from Option 2 - South West to Option 1 - South East.

**Recommendation 19:** *Revise the preferred direction of growth to be Draft Core Strategy Option 1 – South East (as shown on the amended plans in Map section).*

*Include a 'Direction of Growth' policy in the Core Strategy, which indicates that in Ilminster the direction of strategic growth will be to the South East.*

### 3.2d Wincanton – Direction for development

Provision is made in the draft Core Strategy for the delivery of approximately 1053 dwellings over the plan period in Wincanton (703 already committed and an additional 350 dwellings to be accommodated). A minimum of 1.5 hectares of employment land is identified as being required. Four options for the direction of growth were considered with Option 1 on the western side of Wincanton extending to the north is identified as the preferred Option in the draft.

- Option 1 - West of New Barns Farm and north of Dancing Lane
- Option 2 - Hatherleigh Farm, south of A303, (for employment use only)
- Option 3 - Land at Wincanton Common, South of A303
- Option 4 - Land north of Bayford Hill



#### Option 1 - West of New Barns Farm and north of Dancing Lane

Concerns were raised regarding the potential impact of development on highways and social infrastructure, landscape, historic environment, amenity, flooding and level of housing need. Many respondents considered that the impact of existing commitments in Wincanton should be felt before considering more growth.

#### Option 2 - Hatherleigh Farm, south of A303, (for employment use only)

Concern was expressed regarding the potential impact of development on Great Hatherleigh Farm particularly in relation to biodiversity and flooding. Suggested that Development would destroy the integrity of the Royal Medieval Deer Park of Hatherleigh.

#### Option 3 - Land at Wincanton Common, South of A303

No issues were raised regarding this Option.

#### Option 4 – Land north of Bayford Hill

Concern was expressed regarding the potential impact of this option on the highway network, although the view was also put forward that this option is better related to the existing High Street and would result in a more balanced settlement.

### *Commentary*

Following the reassessment of the levels of strategic growth required across the District in the light of the evidence in the Baker Report “Housing Requirement for South Somerset and Yeovil”, comments received and concerns regarding the area of land proposed for employment use; it is now proposed that the total housing provision for Wincanton is 703 dwellings which reflects the level of existing commitments and that Policy SS5 Strategic Employment Growth is amended to deliver a minimum of 8.61 ha of ‘B’ use employment land (3.61 ha of existing supply plus an additional 5 ha). As a result of this it was necessary to remove the existing options and preferred option for the direction of growth but to consider the specific spatial implications of employment use as opposed to mixed uses as originally proposed.

Option 1 remains the preferred direction for growth in Wincanton for employment purposes, as it includes the most appropriate location for employment growth in terms of accessibility to the strategic highway network thus minimising the impact of Heavy Goods Vehicles on the rest of Wincanton. Locating the proposed additional employment growth to the south west means that the employment land will be well related to the uses on Wincanton Business Park resulting in a further concentration of employment uses in this area. It is considered that a more dispersed approach would be less strategic and may add to congestion in the Town Centre. The reduced size of the proposed direction of growth, as shown on the Plans set out in the Map schedule, reflects the change in the overall strategic approach. Its location to the south of the former mixed option reflects better road access and juxtaposition with existing industry. Consultation responses show a significant level of concern regarding the development of the land to the west of Dancing Lane in terms of impact on the landscape, topography and vehicular access. In view of the fact that employment growth only is now proposed, the south west of Option 1 provides the most accessible and logical area to be taken forward.

**Recommendation 20:** *That Draft Core Strategy Option 1 to the west of the town be retained but reduced in size and located to the immediate west of the employment site and New Barns Farm specifically as a preferred direction for strategic employment growth (as shown on the amended plans in Map section).*

*Include a 'Direction of Growth' policy in the Core Strategy, which indicates that in Wincanton the direction of strategic employment growth will be to the south west as shown on the attached map.*

### 3.2e Ansford / Castle Cary – Direction for growth

Three directions of growth were sustainably appraised to identify a preferred direction of growth for the suggested strategic housing and employment growth and were presented in the draft Core Strategy.

- Option 1: North of Torbay Road, and east and west of Station Road;
- Option 2: North of Ansford Hill and Ansford School; and
- Option 3: South of Ansford School & Solomans Lane.

Option 1 - North of Torbay Road . The overall Sustainability Appraisal findings for this option produces the most positive effects as it is well related to existing employment opportunities, the town centre and is only medium distances from both primary and secondary school provision whilst protecting the periphery landscape. Some negative effects are experienced from the loss of Greenfield land, noise & land pollution and impact on feeding grounds for bat populations.

Option 2 - North of Ansford Hill and Ansford School has several positive effect in its relationship with the secondary school and opportunities to link with the town's train station however this option experiences negative effects from the loss of Greenfield land, distance from services, noise & land pollution and impact on feeding grounds for bat populations and impact on landscapes of high value. For these reasons, this option is not a preferred location for growth.

Option 3 - South of Ansford School & Solomans Lane has many positive effects in terms of its relationship with Ansford School, the town centre, medium distance from primary School and health provision. Although negative effects are experienced from the loss of Greenfield land, noise & land pollution and impact on feeding grounds for bat populations.

The South Somerset Draft Core Strategy presented Option 1 as the Councils preferred location for development. Preference for this direction of growth is based partly on evidence presented in the Landscape Character Assessment that indicates that this area has a high-moderate capacity to accommodate built development. The Landscape Character Assessment suggests that land North of Torbay Road in Option 1 has potential for 4.5ha of residential land and 3.6ha of employment land.

Representations generally support the Council's preferred option for growth to the north west of at Castle Cary between Torbay Road Industrial Estate and Lower Ansford although general concerns have been raised about the potential loss of agricultural land for farming purposes.

## Commentary

Ansford / Castle Cary is surrounded by large areas of Grade 1 & 2 agricultural land and all options would be located in areas of the highest Grades of agricultural land. This issue is not therefore considered a determining factor.

The Environment Agency note that the preferred option is subject to surface water flooding and suggest a strategic approach is taken for the site and that appropriate flood mitigation measures are included and that capacity exists within the network to deal with the extra run off.

As well as housing, Ansford / Castle Cary has also been allocated 3ha of employment land additional to commitment. Due to the preferred options location adjacent to the existing Torbay Road Industrial Estate it is considered that this location is also suitable for the required employment land allocation. Within this Option there will be a requirement for a distributor road to be provided to allow HGV traffic to access without undue impact on the residential area of Torbay Road, dependent upon the exact location of development. The County Council, as highway authority, have confirmed that this would be required and that a distributor road with a roundabout indicated at the junction with Torbay Road and a priority junction shown for Station Road would be appropriate and would be viable at the present time. Necessary arrangements would also be made for pedestrian and cycle access.

Discussions with the agent of the land in question indicates that a road linking Torbay Road and Station Road would be viable and could be provided

Given the Council's preferred option benefits from landscape capacity to accommodate built development and known developer interest in bringing forward a site in this area on a viable basis and incorporating an appropriate link road to enable better access to existing and proposed employment land it is recommended that this option remains the Council's preferred direction for growth.

<b>Recommendation 21:</b>	<i>That draft Core Strategy Option 1 to the north of Torbay Road, and east and west of Station Road is taken forward as the preferred direction for strategic growth at Ansford / Castle Cary (as shown on the amended plans in Map section).</i>
	<i>Include a 'Direction of Growth' policy in the Core Strategy, which indicates that in Ansford / Castle Cary the direction of strategic growth will be north of Torbay Road, and east and west of Station Road as shown on the following map.</i>
	<i>Incorporate the requirement for a link road between Torbay Road and Station Road to be achieved in association with the preferred direction of growth</i>

### 3.2f Langport / Huish Episcopi – Direction for growth

Directions for growth were not included within the draft Core Strategy (incorporating preferred options) by virtue of Langport / Huish Episcopi's proposed rural centre status at that time. However, the proposal to change Langport / Huish Episcopi from a Rural

Centre to a Market Town means it is necessary to consider potential directions of growth at the settlement.

As options for broad locations of development were not included, there were no representations on this issue at Langport / Huish Episcopi. Nevertheless, a specific site was suggested to the west of the town during the preferred options consultation. Given the lack of previous opportunity for comment on this issue, a meeting was held with Langport Town Council and Huish Episcopi Parish Council. Concern was raised at this meeting that the initially proposed direction of growth indicated possible coalescence with Wearne, and that flooding is an issue in the southern part of the land to the east of the settlement.

### *Commentary*

The area to the west of the town was discounted as a direction of growth due to a lack of evidence of further land availability for development in this area, low landscape capacity, and high historic value with the presence of a Grade II\* listed building. Much of the area surrounding Langport / Huish Episcopi has a high flood risk, which limits the potential for development – given this key constraint, two options were initially considered: Option 1 – north and east of Old Kelways and Option 2 – south of Old Kelways, area adjacent the railway line / cricket pitch and south of St Mary's Church (a combination of three areas). Overall, both options perform similarly in the Sustainability Appraisal; and there is evidence that land is available for development in both.

**Recommendation 22:** *Include a Direction of Growth policy in the Core Strategy that indicates a broad direction of growth for Langport / Huish Episcopi, encompassing locations to the north, east and south east of the town, with specific proposals within these options to come forward through the development management process (as shown on the amended plans in Map section) and to avoid co-alescence with Wearne.*

### 3.2g Somerton – Direction for growth

Three options for urban extensions to Somerton were proposed in the draft Core Strategy incorporating preferred options. The key sustainability appraisal findings of each option are highlighted below.

Option 1 (south of the town centre) – the close proximity of this location to the town centre brings several benefits through maximising access to existing shops and services by walking and cycling. However some travel beyond the town is likely to access the more 'strategic' facilities (e.g. secondary school). There are some negative environmental effects including impact on adjoining Conservation Area, landscape, bats / otters.

Option 2 (west of the town) – fewer negative environmental effects than Option 1, with less impact on flooding and landscape, biodiversity and historic interest. There is evidence of housing potential in this option. Distance to town centre (around 1km) may discourage walking / cycling to town centre for some, but there is closer access to local shops, primary school and employment opportunities at Bancombe Road Trading Estate. The bus stop on Langport Road offers potential to use the bus.

Option 3 (north west) – the general economic benefits that new development can bring are the same as Options 1 and 2. There is likely to be negative landscape and biodiversity impacts if the north west part of the option is developed, and there is no evidence that this part is available for housing. The distance of around 1km to the town centre may discourage walking / cycling to town centre for some, but there is closer access to local shops, primary school and employment opportunities at Bancombe Road Trading Estate.

Somerton received the highest volume of comments during consultation of any settlement apart from Yeovil, with a substantial number of these relating to the potential locations for extending the town. Option 2 (the preferred option) raised the most issues, and Option 3 had the most support.

#### *Commentary*

Option 1 should not be pursued due to environmental constraints, and due to a lack of evidence that the land is available and deliverable. The northern section of Option 3, where there would be a major landscape impact and there is a lack of evidence as to site availability, should be removed. But there is little to choose between the Option 2 and the southern section of Option 3.

**Recommendation 23:** *Include a direction of growth policy in the Core Strategy that indicates a combination of Option 2 and the refined Option 3 (excluding area north of Bradley Hill Lane) i.e. to the west of the town should be identified as the direction of growth at Somerton (as shown on the amended plans in Map section)*

#### **4. Implications of Infrastructure Planning in South Somerset Report**

A copy of the Infrastructure Planning in South Somerset Report incorporating the Infrastructure Delivery Plan was received and considered by the PMB at its workshop 11 on January 18<sup>th</sup> 2012. In relation to the emerging Core Strategy the IDP presents the requirements, phasing, costings and funding options for infrastructure required in association with development. Specifically the IDP has sought to:

- Highlight infrastructure capacity issues and existing capacity where possible, through the review of existing information and consultation with stakeholders.
- Identify the infrastructure impacts of additional development in generic and specific terms for main settlements and district basis.
- Illustrate the net infrastructure impact of new development and highlight significant issues.
- Provide information on the indicative cost of infrastructure.
- Identify public funding mechanisms and responsibility for delivery.
- Indicate which infrastructure is critical to delivery of development, which is necessary to establish sustainable growth and communities and which is desirable to
- Inform decision making on where growth should go and which infrastructure should be prioritised

From the report, it is evident that there are no overriding infrastructure issues associated with any of the proposed scale or locations of growth although there are differing cost

implications particularly associated with infrastructure for Yeovil's urban extension and the strategic allocation for Chard. The IDP database does give an indication of the phasing of delivery needed and this should be used to prioritise infrastructure projects in association with CIL or other funding. A brief overview of the main settlements is set out below:-

## Yeovil

Yeovil's infrastructure requirements fall into two areas, that associated with growth of Yeovil within the urban area and that associated with the planned urban extension. To inform the appropriate direction of growth for an urban extension for Yeovil in terms of infrastructure costs, infrastructure considerations have been looked at for both an urban extension to the south as the preferred option and to the north-west. Infrastructure requirements and cost, where known, have therefore been included within the schedule of infrastructure for both sites even though only one would subsequently come forward. Clearly some of the infrastructure requirements would be common for any location of growth, such as schools, health centre, strategic sport and town centre highway improvements but there are some site specific works, mainly highways and utilities which do show a variation in cost. However, whilst there are some considerable infrastructure needs associated with Yeovil's growth there are none which would require any reconsideration of the location or phasing of the growth.

The cost of the infrastructure required for the urban extension is significant and it is clear that site viability, wherever the urban extension is to be located, will be an issue and significant external funding resources for infrastructure will be required. From the CIL report presented to District Executive and Full Council in February 2012, it can be seen that there is a recommended variation in the CIL rate to be applied to the urban extension at Yeovil (and Chard) as the result of need to ensure deliverability. Some of the infrastructure is critical in order to deliver the growth and timing will be key.

From the findings of the IDP, the preferred location of the Yeovil urban extension to the south will cost less from an infrastructure perspective and it can be seen that it is the physical infrastructure costs which make the difference (roads, utility services, public transport etc). This adds to and confirms the findings of the Sustainability Appraisal carried out as part of the draft Core Strategy that the location of an urban extension to the south is the preferred location.

## Chard

Considerable detail on the infrastructure needs of Chard is known through the work on the Chard Regeneration Framework carried out initially by LDF Consultants with more recent updates by Thomas Lister Consultants. These have been factored into the database of infrastructure needed for the Chard Eastern Development Area (CEDA) and it is clear that the critical infrastructure required is both substantial and costly. As a result the works at Chard, like Yeovil, would need to be prioritised for any funding if the growth is to be achieved in accordance with the trajectory. There is a decision to be made in relation to any CIL charge for Chard and whether the development can make any contributions to a CIL and still deliver affordable housing but it is clear that the cost implication of the physical infrastructure is substantial and that CEDA will only be deliverable if compromises are made or the infrastructure is supported in whole or in part by funding from external bodies in the initial stages of development. The infrastructure costs therefore, are most likely to require some form of initial public funding and furthermore it is likely that the developers would not be able to deliver 35% affordable housing and a full CIL charge in addition to funding the infrastructure and alternative solutions or compromises will be necessary.



In view of the benefits of the Chard Eastern Development Area (CEDA) to the overall growth proposed within the District it would be necessary to prioritise any funding for infrastructure to this area in order to ensure its timely delivery in accordance with the anticipated housing trajectory.

#### Other Market Towns

Ilminster and Castle Cary are the only other market towns, which have any identified critical infrastructure for delivering growth. In both cases the critical infrastructure identified are for transport (road) projects have had some initial viability testing carried out and it is expected that the developers would be able to fund this infrastructure as part of onsite S106 agreements for any new development.

The IDP identifies that infrastructure will be required alongside growth in all the market towns and this will need funding. It is anticipated that this will either be funded through onsite development costs or will need to be provided as part of the growth proposals as “necessary” but not “critical” infrastructure to deliver of growth. Such projects will need to be identified as part of an infrastructure plan for funding priorities but none of the infrastructure identified would prevent the growth proposed coming forward nor have any timing effects. Furthermore the IDP identifies in the case of all the towns bar Ilminster and Castle Cary that the identified infrastructure is non-site specific and would be required wherever the Market Town’s growth was shown. In the case of both Ilminster and Castle Cary whilst the road infrastructure is site specific the viability analysis has indicated that these two sites remain viable and so the additional cost associated with the proposed directions of growth for the two towns are not material in deciding where to recommend growth

The preferred options for each of the Market Towns as shown in the Draft Core Strategy therefore do not require changing as a consequence of the information coming from the IDP. The direction of growth now recommended for Langport / Huish Episcopi to the north, east and south-east as previously considered by PMB also remains unaffected in relation to the information within the IDP.

#### Rural Centres and Rural Settlements (Rest of the District)

Martock is the only other settlement that has any identified critical infrastructure. This is identified as fluvial flood alleviation, which would be funded by the Environment Agency through an on site planning obligation. Infrastructure requirements for the Rural Centres is non site specific and as no directions of growth are identified for these settlements there are no obvious implications as to where development can go and the levels of growth indicated for these settlements can be met in infrastructure terms. The infrastructure projects identified in other settlements, known collectively as the rural area, are those projects already identified in various capital programmes of infrastructure providers and identified deficiencies in leisure and open space.

The Infrastructure Planning in South Somerset Report (the IDP) is appended in full as appendix K. It is a statutory requirement that the IDP be placed alongside the Core Strategy proposed Submission document as an essential part of the evidence base for the document and Members are accordingly asked to endorse its publication.

<b>Recommendation 24:</b>	<i>That members endorse the Infrastructure Planning in South Somerset report for publication alongside the Core Strategy Proposed Submission document (appendix K).</i>
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## **5. Implications of Adoption of CIL and Interim Planning Obligation Policy**

In April 2011 Consultants Baker Associates / Roger Tym and Partners both now part of Peter Brett's Associates were appointed in order to prepare an infrastructure Delivery Plan for South Somerset. The Consultants were also asked to review the Core Strategy planning obligations policy and recommend on the appropriateness of moving to a Community Infrastructure Levy (CIL) and they produced the "approach to developer contributions" report. As part of the consideration of the appropriate approach they also produced a report on Community Infrastructure Levy Evidence base that is essentially the Market and Viability Assessment required to help decide on adopting a CIL and what rates might be charged in a future Charging Schedule.

CIL takes the form of a charge per square metre (psm) of additional floorspace and can be charged on most new development. There are exemptions for charitable organisations and affordable housing together with some size thresholds for non residential uses. The level of the CIL charge or tariff is set by individual authorities based on the funding gap identified as part of the IDP but also tested against development viability to ensure that it will not affect the viability of all developments or adversely affect certain types of development or development in certain locations.

The Consultant's reports on the appropriateness of proceeding to a CIL approach within South Somerset and what potential CIL charging rates are to be pursued has been concluded and considered by District Executive and at the time of writing this report the Executive are advocating proceeding to a CIL to Full Council and using existing saved policy on obligations in the interim. In doing so relevant representations on the matter were taken into account.

A summary of the main recommendations is presented within this report for ease of comprehension.

The seven main recommendations of the Consultant's Approach to Developer Contributions report are set out below

- Recommendation - SSDC should implement the CIL
- Recommendation - SSDC should not consider an exceptional circumstances policy until the schedule has been in operation and if it appears that development proposals are not coming forward on the basis of viability.
- Recommendation - SSDC should reduce the number of policies (as currently set out in the draft policy) towards planning obligations. A single flexible policy should indicate the intention to implement CIL and the identification of other obligations that will be required.
- Recommendation - SSDC should develop realistic and deliverable policies. CIL is not able to fund all infrastructure requirements therefore other sources of funding should be identified or a review of proposed policy requirements should be undertaken to ensure that the Core strategy is deliverable.
- Recommendation - SSDC should prepare the CIL in line with the Core Strategy in order to minimise time lags and limit resource impacts
- Recommendation - SSDC should ensure that sufficient resource is made available to enable implementation as quickly as possible to minimise loss of CIL contributions

- Recommendation - SSDC should utilise existing policy and procedures to negotiate S106 agreements until the CIL is in place; taking into account the requirements to be more bespoke about its requirements and less formulaic.

With the exception of the third and fourth recommendation above all these recommendations are central to the issue of moving to a CIL approach for developer contributions and have been considered by District Executive in February. Recommendation 5 relating to resourcing has been addressed separately as a management matter and the last recommendation establishing how obligations will be dealt with prior to adoption of CIL has also been endorsed by District Executive.

Recommendations 3 and 4 above have not been addressed within the report considered by District Executive in February. These are specifically addressed in the subsequent section of this report and within the context of wider representations on planning obligations and the requirement still to pursue on site matters post the introduction of the CIL regime post April 2014 by planning obligations.

**Recommendation 25:** *That members note that the recommendations of the Consultants in relation to adopting a CIL, being resourced to deal with it and dealing with obligations through existing policy in the interim have been addressed at the District Executive and Full Council in February 2012.*

## 6. Planning Obligation Policy Post introduction of CIL

The Draft Core Strategy proposes to continue to seek S106 contributions for the provision of necessary infrastructure. The policies can be divided into specified planning obligations policies:

- Policy SS6 Phasing and Cumulative Impact
- Policy SS7 Planning Obligation
- Policy SS8 Viability

and location specific planning obligations policies

- Yeovil (Policies YV2, YV4, YV5)
- Chard (Policies CV1, CV2, CV3 CV4)

And topic area planning obligation policies which have been dealt with, where necessary, under their relevant topic areas:

- Policy HG4 Provision of Affordable Housing
- Policy TA1 Low Carbon Travel
- Policy TA3 Transport Impact of New Development
- Policy HW1 Provision of open space and outdoor playing space in new development
- Policy HW2 Provision of Sports, Cultural and Community

A number of representations were received to the general planning obligations policies, SS6 - SS8, primarily raising concerns that existing infrastructure is inadequate and new or additional infrastructure must be provided alongside growth, that the Council should move towards a tariff based approach to fund infrastructure and the need to ensure that

obligations are not so onerous as to prevent development coming forward (viability) and that the Council should seek other funding streams as development is unlikely to be able to fund all infrastructure in the future. There is also the need to remain consistent with both existing legislation, as set out in Circular 05 / 05, and emerging guidance on CIL. On the whole most representations supported the inclusion of obligations policies in principle where it meets the necessary tests, set out in the legislation and where projects are not rendered unviable.

In looking at the town specific obligations, most of the comments relate to the lack of existing infrastructure and little detail of proposed new infrastructure to serve any growth proposals. Specific comments are made in relation to perceived new infrastructure requirements. Some comments refer to the need for developers to fund new infrastructure and that a flat rate contribution would be beneficial and that all sites should pay rather than just large sites. There is also concern that money raised locally through S106 should be spent locally.

For the thematic policies, few directly comment on planning obligations although need for a roof tax or tariff and the need to combine planning obligations policies to a single policy are suggested. There are also concerns raised that affordable housing and nursing home schemes should not be required to fund the same level of obligations as market housing and that other uses than residential should also be required to fund infrastructure.

The introduction of a CIL would bring about a level of certainty for landowners and developers and allow for proper planning of infrastructure to support growth. CIL takes the form of a single tariff or roof tax which has been suggested and would be payable from most new development, not just the larger sites. Affordable housing and buildings for charities would not pay CIL, thus satisfying the objections raised in this respect. As recommended by the consultants, following viability testing of different uses, the proposed CIL would be charged on residential development and large format retail schemes at present time as other types of new development would not currently be viable with CIL.

Planning obligations will remain alongside CIL both for affordable housing and to cover those matters, which are site / development specific to mitigate the direct impact of a new development. A planning obligation policy will therefore be required in the Core Strategy to cover the provision of affordable housing and to make it clear that a planning obligation will be sought for site specific requirements for infrastructure and community benefits. This policy will also set out the intention to charge a CIL throughout the District to provide infrastructure of a more strategic nature and that this charge will apply to certain types of development although the detail of the charges and CIL rates will be covered in the CIL Charging Schedule itself. This approach has been used by other local authorities whose Core Strategies have been found sound and is an approach recommended by the consultants.

In terms of the impact on the town specific policies and thematic policies, minor rewording of Yeovil and Chard policies and supporting text may be needed to ensure that it is clear that the direct impact of any proposal will continue to attract planning obligations in addition to a strategic contribution through CIL. Policy CV3 is already recommended to be deleted (see below). The thematic policies remain relevant as they stand with exception of policies HW1 and HW2 which will need to be amended to be clear that planning obligations will be sought for mitigation of the direct impact of proposals and that CIL will be payable for sport and leisure of a strategic nature. Details of which specific proposals or themes will be funded through CIL will need to be made prior to the adoption of a CIL.

<b>Recommendation 26:</b>	<p><i>Delete Policy SS6 in light of proposed move to CIL.</i></p> <p><i>Include a revised planning obligation policy SS7 based on combining Policies SS7 and SS8 (Planning Obligations and Viability) in the Core Strategy to ensure the direct impact of development can be properly mitigated.</i></p> <p><i>Modify policies YV2, YV4, YV5, CV1, CV2, CV4 to ensure they reflect the need for mitigation of any direct impact through revised policy SS7 is reflected.</i></p> <p><i>Amend policies HW1 and HW2 to reflect need for planning obligations for mitigation of specific proposals only and to clarify that CIL will be sought for strategic infrastructure.</i></p>
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## 7. Major policy matters

### 7.1 Employment land

The majority of objections relate to the level of employment land attributed to certain settlements. The comments made fall into 4 broad categories:

1. Querying the economic projections, which underlie the policy.
2. Requesting that provision (either land and / or jobs targets) be made for non-B uses.
3. Requesting that a number of jobs be identified for each settlement.
4. Querying the distribution (and level) of jobs and housing attributed to individual settlements.

#### *Commentary*

##### a) Economic Projections

Since publication of the Draft Core Strategy, Baker Associates have reviewed the District's economic potential (Housing Requirement for South Somerset and Yeovil, February 2011). The report identifies the number of new jobs that could be supported in the District to 2028 (11,506 jobs) and these have been converted into a traditional employment land figure to update draft Policy SS5 (and account has been taken of the latest BRES data). There is therefore clear evidence to support the jobs and land provision identified in revised Policy SS5. The Consultant's higher estimate of job creation has been taken to establish job growth figures to reflect the Council's aspirations for the economy and to be consistent with the methodology used to produce housing provision figures.

Table 8 below sets out Policy SS5 and establishes a table of employment by settlement that reflect Baker Associates report "Housing Requirement for South Somerset and Yeovil" as updated and responds to Core Strategy representations on employment land.



b) Provision for non-B Uses

Planning Policy Statement 4 (PPS4) marks a new departure in national policy, in that in its definition of economic development, it brings together all economic land uses, covering retail, leisure and public services (non-B uses) as well as the traditional employment uses (B uses).

Currently the South Somerset Employment Land Review (Stages 1-3) (ELR) and the South Somerset Retail Study Update are the two pieces of evidence base, which comply with PPS4. The ELR identifies the need for 'traditional' employment land (catering for activities which fall into the B Use Class of the General Permitted Development Order or GPDO) in Yeovil, the Market Towns and Rural Centres, whilst the South Somerset Retail Study Update provides guidance on retail floorspace capacity for Yeovil and the larger Market Towns.

Apart from retailing, the diverse nature of other non B-class use activities makes it difficult to generate a figure for the amount of land they require to the end of the plan period. Given the difficulties, and likely inaccuracies in calculating the amount of land required by non B-class uses over the plan period, it is suggested that no land is formally identified for this sector of the economy, but that the need for land is recognised through the identification of the number of jobs arising in the non B use sectors (see c below) and its location guided by the Development Management process.

c) Identifying the Number of Jobs

Identifying the total number of jobs to be delivered over the plan period, by settlement, will give a clear indication of the anticipated level of all economic growth that the Core Strategy is seeking to support, and will additionally address the concerns over the lack of consideration of non B-Uses. The number of new jobs is also an easy concept to understand by the public.

It is suggested that the distribution of new jobs be in line with past trends (Nomis 2006).

d) Distribution of Jobs and Housing across the District

The Core Strategy should seek to deliver balanced employment and housing growth, with employment taking the lead, to reflect the emphasis on economic-led development, as expressed by the withdrawn RSS. Additionally, in order to support economic expansion, a comparable level of homes is needed to support the growth of economically active residents. In basic terms it is suggested that the distribution of new jobs be in line with past trends (Nomis 2003 - 2010).

**Recommendation 27:** *Amend draft Policy SS5 as set out below (and relevant references within the Core Strategy text to reflect the economic projections arising from the Baker Report) to include jobs and floorspace targets for Yeovil, the Market Towns and Rural Centres. The distribution of jobs to be as follows - 50% (of jobs) to be attributed to Yeovil, 29% to the Market Towns, 8% to the Rural Centres and 13% to Rural Settlements (reflecting NOMIS evidence).*

*Amend the employment land requirements in addition to existing commitments for Wincanton and the smaller Market Towns and Rural Centres to be as follows:*

*Wincanton – 5.0 hectares*

*Ansford / Castle Cary, Langport / Huish Episcopi and Somerton – 3 hectares*



*Bruton, Ilchester, Martock, Milborne Port, South Petherton and Stoke sub Hamdon – 2 hectares.*

No land to be allocated for non B use classes

**Table 8 Policy SS5 Delivering New Employment Land (Revised 26 January 2012)**

The Core Strategy will assist the delivery of 11, 506 jobs as a minimum, and approximately 618,180 sq metres net / 168 hectares gross of traditional employment land (Use Class B1, B2 and B8) to be directed to the following settlements for the period 1<sup>st</sup> April 2006 to 1<sup>st</sup> April 2028.

Settlement	Core Strategy 2006-2028 Total Employment Land Requirement	Existing Employment Land Commitments	Additional Employment Land Provision Required (total employment land less existing commitments)  (As at April 2011)	Total Jobs to be encouraged 2006-2028 (numbers in brackets indicates jobs in traditional 'B' Uses as defined by the Use Classes Order reflecting the evidenced assumption that 66% of new job creation will be in traditional B uses)
<b>Strategic Town</b>				
Yeovil*	56.34	39.84	16.5**	5,750 (3,795)
<b>Market Towns</b>				
Chard*	17.14	17.14	0.0	1,036 (684)
Crewkerne*	10.10	10.10	0.0	507 (335)
Ilminster*	23.05	23.05	0.0	403 (266)
Wincanton	8.61	3.61	5.0	587 (387)
Somerton	4.91	1.91	3.0	288 (190)
Ansford / Castle Cary	13.19	10.19	3.0	254 (168)
Langport / Huish Episcopi	3.44	0.44	3.0	277 (183)

*Table 8 is continued over the page*

<b>Rural Centres</b>				
Bruton	2.56	0.56	2.0	909 (600)
Ilchester	2.02	0.02	2.0	
Martock	4.79	2.79	2.0	
Milborne Port	2.04	0.04	2.0	
South Petherton	3.80	1.80***	2.0	
Stoke Sub Hamdon	2.0	0.0	2.0	
<b>Other</b>				
Rural Settlements	13.86	7.86	6.0	1,495 (987)
<b>Total</b>	<b>167.85</b>	<b>119.35</b>	<b>48.5</b>	<b>11,506 (7,595)<sup>7</sup></b>

\* Yeovil, Crewkerne & Ilminster have strategic employment sites which are saved from the previous South Somerset Local Plan and Chard's strategic allocation based around Chard Regeneration Plan also includes employment provision, these sites combined equate to a total of 46.35 hectares, and this figure has been included in the overall floorspace figure cited in Policy SS5 above.

\*\* within the 16.5 ha provision, 11.5 ha is expected for the Urban Extension reflecting the higher aspiration for employment provision here to potentially provide 1 job per household to meet eco town's aspirations

\*\*\* This figure relates to Lopen Head Nursery.

## 7.2 Yeovil Airfield Safeguarding

Agusta Westlands expressed concerns in representations to the draft Core Strategy in relation to prospective proposals for an urban extension for Yeovil in respect of the potential impact on safeguarding the Agusta Westlands (AW) flight zones. This prompted a series of meeting between the District Council and Agusta Westlands (AW) to clarify the representations and understand their technical basis and to ensure that the impact of new development would not compromise the safe operations of this important local employer. The consequence is the inclusion of a flight safety zone within the South Somerset Core Strategy. This proposed safeguarding area is shown on the Yeovil map in the Map schedule.

### Flight Safety Zone Justification

In summary the following are key justifications for a safety zone being required:

- In order for AW to carry out test and development flying of both civil and military aircraft AW is required to operate from a civil licensed airfield to satisfy the regulatory process of the Civilian Aviation Authority as well as approval by the Military Aviation Authority in order to apply with military regulations.
- Although there are slight differences, the regulations are broadly the same and both require AW to have the aerodrome regularly surveyed to ensure potential hazards that may effect the safe operations of the airfield are removed or addressed. In particular this includes any hazards that would affect the departure of aircraft from the airfield.
- At present the lack of development to the south and south west of the aerodrome is not justification in itself for retention of AW's approval / licence but from a 'safety of operations' perspective a 'clearway' out after takeoff would drastically

<sup>7</sup> Due to rounding of numbers they may not add up.

reduce the risks to the Aircrew and the surrounding environment from flying operations. Coupled with common sense reduction to risk the safeguarding map submitted with the representations is considered a defining factor in retaining future approvals / licences.

The proposed safeguarding map (as shown on the amended plans in Map section) indicates in red the safety zones that AW requires to be clear of any developments or buildings as far as practical. AW provided the following justification for these safeguarding zones.

- The safety zones are based on simulation work performed using a model, approved by the CAA, which is used to predict air craft flight profiles following an in flight emergency such as an engine failure at heights where a return to base is not possible.
- It would be dangerous to manoeuvre the helicopter other than by going in a straight line to maintain as much control as possible in bringing the helicopter down to the ground safely.
- The width of the safeguarding cone is based on practical experience and judgement of the pilot to provide as much lateral spread as possible to allow the pilot some limited flexibility to ensure a safe landing taking into account any wind or obstacles.

AW also highlighted the following additional issues for consideration in their justification:

- The South West area is the only area around the aerodrome, which has not been developed and is now the sole area in which helicopters can approach and depart the aerodrome safely in many situations.
- When there are unslung loads that need to be carried, this testing can only be conducted by departing and arriving to or from the south west as in exceptional circumstances it may be necessary to jettison the load immediately and therefore the safeguarding zone is the only area where this can happen safely without risk to a third party.
- Development in the red zone would severely impact on the safe test flying activities of both current and future aircraft.
- AW does not own any other facility in the UK to permit such activities.
- Further development could create severe limitations on the planned development and expansion of the business at AW.
- Development in the red zone area would put at risk new programmes, which AW hopes to start.
- Absence of a safeguarding zone(s) would have a negative impact on a new business strategy that is being planned to provide a new maintenance centre for civil aircraft at the factory.

### *Commentary*

It is considered that the justification submitted by Agusta Westlands provides a clear and reasoned argument for the inclusion of a specific policy that safeguards their flight safety zone from inappropriate development. Their letter is explicit in outlining the potential consequences of failing to protect this area from potential hazards when renewing their Civilian and Military Aviation Authority licence in which both bodies scrutinise flight safety. Their letter also outlines the potential consequences of development in this location on their current and future business interests that could again be seriously

compromised.

The flight safety zone has been drawn in a tight cone reflecting only the most dangerous point of take off and a margin of error corresponding to pilot judgement. Given the importance of Agusta Westlands to the Yeovil economy both directly as a major employer and indirectly through numerous suppliers it is certainly in the District Council's remit to ensure continued business success in association with the airport through control of potentially hazardous development to their operations.

**Recommendation 28:** *That a new flight safety zone policy is introduced into the Core Strategy along with an amendment to the Yeovil proposals map. The policy will seek to secure that Development in the flight safety zone will be strictly controlled and limited to that which can be justified as causing no hazard to the operational needs of Agusta Westlands Aerodrome.*

### 7.3 Policy CV3 Chard Obligations

Whilst there was some support for this policy in terms of it's link to viability and other comments regarding detailed issues relating to contributions, as more details have emerged regarding the operation of Community Infrastructure Levy (CIL), set out above, it has become clear that the tariff approach based on the Chard Implementation Plan and set out in draft Policy CV3 will not be acceptable.

#### *Commentary*

Although it is proposed that a small proportion of CIL funds will be directed locally; CIL priorities will be set at a District level and Policy CV3 is no longer necessary. Furthermore it is not possible under the CIL regulations to ring fence moneys from specific developments.

**Recommendation 29:** *Delete Policy CV3 and accompanying text.*

### 7.4 Housing Density

Whilst some representations were supportive of the draft Policy HG2 most respondents were concerned about having high densities and felt that sufficient flexibility should be provided within the policy to ensure acceptable forms of development can come forward based on the character and context of the area where the development was to take place.

#### *Commentary*

Since the publication of the Draft Core Strategy and the deletion of the minimum net dwelling density of 30 dwellings per hectare from Planning Policy Statement 3 (PPS3) further research has been carried out into the issue of net housing density (including a sample survey of the approximate net densities of 38 areas within Yeovil, the Market Towns, Rural Centres and rural settlements) which 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 PPS3 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. 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. In the light of the issues discussed it is considered that it is no longer necessary or appropriate to retain Draft Core Strategy Policy HG2.

The suggested end to policy HG2 and specific targets makes it important to make the link with the criteria identified by the government in PPS3 for determining density levels. These are set out in para 46 of the PPS3 and include:

- level of housing demand, need and availability of sites
- infrastructure and services available locally including open space
- efficient use of land
- Accessibility
- local area characteristics
- detailed design considerations

**Recommendation 30:** *Delete Draft Policy HG2.*

*Amend Policy “EQ2: Design” by the addition of criteria and relevant supporting text to address making the most efficient use of land whilst taking into account local infrastructure (including green), site accessibility, local area characteristics and detailed design considerations. Add supporting text making the link to established density criteria in PPS3.*

## 7.5 The use of Previously Developed Land (PDL) for new housing development

Policy HG3 seeks to provide a minimum of 30% of new dwellings on previously developed land over the period of the Core Strategy. This paper highlights the key issues raised during the consultation and outlines a response in the light of proposed changes to national legislation.

There were 10 comments made on Policy HG3, comprising 2 in support, 5 objections and 3 observations – the issues raised are set out below:

- The low target of 30% is unjustified and the policy should be reworded to reflect national policy, which states 60%.
- To propose this amount of greenfield building is madness.
- Agricultural land must remain as such.
- Unoccupied properties should be used before greenfield sites are developed.

- object to the unrealistic reliance placed upon brownfield supply.
- The policy needs to be supported by a continued supply of greenfield land.
- Support maximising housing development on PDL, but not at expense of promoting uncharacteristic high-density development.
- Imposing significant planning obligations on landowners within urban area deters promotion of brownfield land for residential purposes.

It was announced in the March 2011 Budget that “<sup>8</sup>the Government is removing the centrally imposed target specifying the levels of development that should take place on previously developed land.” However, the same document also states “The Government expects a very significant proportion of development to continue to take place on previously developed land.” With the proposed revocation of the Regional Spatial Strategy targets are expected to be determined locally. In addition the removal of garden plots from the PDL category will also affect the proportion of new housing built on PDL.

#### *Commentary*

It should be recognised that PDL is a limited resource in South Somerset due to the predominantly rural nature of the District. A high proportion of development over the past few years has been on PDL but sufficient housing for the projected future population would require more greenfield sites. The Draft Core Strategy target of a minimum of 30% of new development on PDL was derived locally from figures for housing completions and commitments during the first three years of the Core Strategy period, and predicted levels of brownfield land use for the residual housing requirement up to 2026. The policy allows for annual review of the figure through the Annual Monitoring Report. Strong protection for the environment will be maintained through a local policy that will keep pressure on PDL development as a priority over greenfield.

**Recommendation 31:** *Retain 30% target policy for previously developed land.*

#### 7.6 Affordable housing

There was some concern that the need for affordable housing is over stated. There was a desire to see the definition of affordable housing extended to include other types of housing and an ambition to harmonise space standards at the earliest opportunity following a statement by Minister for Housing stating that for the meantime the Homes and Communities Agency will continue to use existing space standards. Some questioned why a target of 35% was being imposed when viability evidence shows that as at July 2008 generally 30% is viable (as at July 2008 based on a threshold of 15 dwellings), and the viability update (April 2010) is 20% (based on a threshold of 6 dwellings).

There was both general support and objection expressed for the threshold of 6 or more dwellings. It was pointed out that national policy sets an indicative threshold of 15 dwellings, which was considered to be appropriate for Yeovil, Market Towns, and Rural Centres although it was also suggested that a higher threshold should be set in Yeovil and Chard. Concern was expressed that such a low threshold will lead to more open book negotiations taking place. Objection was made to the site size threshold of 0.1 hectares for all sites apart from Rural Centres and rural settlements.

<sup>8</sup>

The Plan for Growth, HM Treasury / Department for Business, Innovation and Skills March 2011



## *Commentary*

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). The Strategic Housing Market Assessment (SHMA) shows that there is a net annual need for 659 new affordable homes in South Somerset. 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.

The 35% target is based on the level of need and reasonable viability as summarised by the Strategic Housing Market Assessment (SHMA). 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.

It is the intention that this and future SHLVAs should be used to guide affordable housing provision negotiations and the evidence will be updated periodically, approximately every 3 years allows for a flexible approach that takes account of market conditions and likely timescales. Whilst this evidence will be used to inform negotiation it is considered that Policy HG4 should have a target that reflects the level of need as viability may improve over the plan period.

The affordable housing threshold of 6 or more dwellings arises from the recommendations in the Strategic Housing Land Viability Assessment 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. Despite the national indicative minimum threshold of 15 dwellings it is considered that this document provides the additional evidence required to justify a departure from the threshold of 10 recommend in the original SHMA particularly given the potential cumulative impact of the delivery of dwellings on smaller sites across the District. 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 Core Strategy is clear that the Open Book approach can be used to negotiate an appropriate viable level of affordable housing provision.

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)). The density research paper 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 (based on a density of 30 dph). The draft National Planning Policy Framework (2011) supports local authorities setting their own approach to housing density.

The Government's recent introduction of the affordable rent model for publically funded schemes has required supporting text to clarify how the Council will treat this new model.

Whilst the financial viability work in 2010 showed smaller sites were unviable to accommodate significant affordable housing provision the undertaking of a market / viability assessment for the possible introduction of CIL enabled a context for review of this work. Baker Associates were instructed by South Somerset District Council to carry out a Small Sites Affordable Housing Financial Contributions Viability Appraisal to investigate whether it is feasible to seek a financial contribution from smaller sites accommodating 1-5 dwellings. A key objective was to include all residential development in the affordable housing contribution process, thereby capturing a significant proportion of developments that would otherwise be exempt, without threatening viability or reducing housing delivery.

The Small Sites Affordable Housing Financial Contributions Economic Viability Appraisal (2012) examined 11 model small sites in different locations across the district, reflecting different types of development at the upper and lower ends of the market and tested them at the equivalent of 5%, 10% and 15% on site affordable housing provision.

The results of the modeling shows that all sites are viable at 5%, 8 are viable at 10% and only 3 are viable at 15%. All village sites that were modelled are viable at 10% therefore it is suggested that in order to maximise the affordable housing contribution a 5% equivalent on site contribution should be sought in Yeovil and Market Towns and 10% in Rural Centres and Rural Settlements (5% equates to £20 per sq m and 10% equates to £40 per sq m), this contribution would be in addition to the relevant standard CIL contribution and would need to be reflected in Policy. Affordable housing provision is outside of CIL regulations and therefore the requirement to seek a financial contribution from small sites would be under Section 106 as a commuted sum. Affordable housing is exempt in current regulations from the limit for pooling financial contributions from more than 5 sites.

**Recommendation 32:**

*Retain 35% target for affordable housing.*

*Agree threshold of 6 dwellings at which affordable housing target policy applies.*

*Clarify in text the nature and role of affordable rent.*

*Amend Draft Core Strategy Policy HG4 to show a corresponding area to 0.2 ha for all settlements as an alternative threshold for small sites.*

*Amend Draft Core Strategy HG4 by the addition of the following text: "Small sites below the threshold for a full affordable housing contribution will be expected, where it is viable to do so, to pay a commuted sum equivalent to a percentage of affordable housing provision on site as set out below.*

<b>Settlement</b>	<b>% of affordable housing provision on site</b>	<b>Number of dwellings</b>
<i>Yeovil and Market Towns</i>	<i>5%</i>	<i>1-5</i>
<i>Rural Centres and Rural Settlements</i>	<i>10%</i>	<i>1-5</i>

*Amend paragraph 8.34 by adding "or any standard subsequently adopted by South Somerset District Council." at the end of the final sentence.*

## 7.7 Gypsy and Travellers and Travelling Show people

Clarification needed of potential impact of sites for Gypsies and travellers and show people on sites with national or internationally recognised designations for protection

### *Commentary*

Clarification is needed that such designations preclude gypsy and traveller sites as they do other developments.

**Recommendation 33:** *Amend second criteria point of HG6 accordingly to protect national and international designations.*

## 7.8 Specialist Housing Provision for Older People

It has been suggested that a specific policy is required to address the needs of elderly people in the district.

### *Commentary*

It is considered that given the ageing population of South Somerset there would be some benefit in having a policy, which specifically addresses the provision of specialist care housing for the older people. In order to maximise sustainability the location of such facilities will normally be directed towards larger settlements. In some cases there may be a need for a countryside location but this will need to be explicit and justified against normal sustainability criteria.

**Recommendation 34:** *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 for provision of Care Homes and other specialist housing accommodation to meet an identified need. Where in exceptional circumstances provision is proposed in the countryside, the Council will require clear justification for its location taking into account the nature of specialist care required and demonstration that alternative sites are unsuitable and / or unavailable and the economic benefit of the proposal to the locality.*

*Clarify in supporting text the nature of extra care and continuing care retirement communities.*

## 7.9 Henstridge Airfield

Area East Committee has raised the issue about planning for development in a coordinated and timely manner at Henstridge airfield. The current Local Plan contains a policy; ME / HENS / 1 as set out below to control further development at the airfield, which would unacceptably intensify the level of activity or significantly increase built development on the site.

*“Because of its remote, countryside location, permission will not be granted for further development at Henstridge Airfield that would unacceptably intensify the level of activity or materially add to built development.”*

Whilst rural employment is welcomed through Policy SS2, this must be of a scale commensurate with the location. Given the need to maintain a tight control over further development and traffic generation in the vicinity of the Airfield, this policy should be retained. A masterplan has been agreed in accordance with a resolution by Area East Committee on 13<sup>th</sup> May 2009 in order to guide future development.

**Recommendation 35:** *Existing Local Plan Policy ME / HENS / 1 continue to be retained once the Core Strategy has been adopted.*

## 7.10 Employment Land Safeguarding

Concern was raised through the consultation responses, that Policy EP3 was not strong enough to protect existing employment land, sites and premises.

### *Commentary*

The draft National Planning Policy Framework recommends that local authorities do not safeguard employment land, however as stated, there has been a significant loss of employment land in recent years across the District (monitoring illustrates that between 1<sup>st</sup> April 2006 and 31<sup>st</sup> March 2010, 10.14 hectares of employment land has been lost to other uses and planning permission has been granted for 6.68 hectares of employment land to change use to other uses) and therefore to prevent the further loss and subsequent need to replace with greenfield sites, Policy EP3, which is aimed at safeguarding land, should be strengthened from the previous South Somerset Local Plan Policy.

Despite the Government’s suggested approach to employment land, given local concern, employment land should continue to be safeguarded.

**Recommendation 36:** *Amend Policy EP3 to strengthen the protection of employment land by refining the uses to which it applies (B use classes), introducing a clause that prevents change of use occurring if the alternative use is incompatible with the surrounding (industrial) and detrimental to the operation of the existing businesses in the area and simplify the criteria of the policy.*

### 7.11 Live / Work facilities

There is no proposed change to the draft Core Strategy however given that the current policy is not in accordance with national policy it is felt that Members need to be aware of this fact. There is strong local evidence that this policy does not and is not working within South Somerset and on this basis it is felt that the current policy within the draft Core Strategy that seeks to preclude live / work facilities should be retained. Wording of text should be made clearer.

**Recommendation 37:** *Retain policy EP5 of the draft Core Strategy and make wording clearer.*

### 7.12 Major new tourist facilities

Whilst there was support for the policy in general terms there was concern as to whether it was needed.

#### *Commentary*

There is considered to be no need for a specific major tourism facility policy as major tourism policy applications can be addressed through the more generic policy EP7

**Recommendation 38:** *Delete policy EP8 Major new Tourist Facilities but incorporate the text into Policy EP7 supporting text.*

### 7.13 Ilchester, Milborne Port and Stoke Sub Hamdon town centre boundaries and primary shop frontages

The settlements of Milborne Port, Ilchester and Stoke Sub Hamdon do not have Town Centre or Primary Shopping Area boundaries. These settlements are identified as Rural Centres, and therefore they require these designations.

#### *Commentary*

PPS4 defines Town Centres and Primary Shopping Areas:

- Town Centre: defined area of predominantly leisure, business and other main town centre uses.
- Primary Shopping Area (PSA): where retail development is concentrated. PSA is used to define 'Edge-of-Centre' for purposes of the sequential test.

The approach to drawing up these boundaries follows the PPS4 definition, and involved site visits to each of the settlements. On site, a judgement has been made as to the extent of the area predominantly in retail / town centre use and a boundary drawn up accordingly.

Given that each settlement's town centre area is relatively small, the Primary Shopping Area and Town Centre Boundary, are considered to be one and the same, this is

representative of many of the retail boundaries in the South Somerset Local Plan (that are all currently saved).

The proposed boundaries are drawn 'tightly' around the majority of the building footprints. This is representative of the boundaries in the South Somerset Local Plan. Drawing the boundaries in this way will not impede further town centre development, but should serve to protect the existing town centre.

**Recommendation 39:** *Amend the Proposals Map for Ilchester, Milborne Port and Stoke Sub Hamdon to include the Town Centre and Primary Shopping Area boundaries (as shown on the amended plans in Map section) and re-iterate the relevant local plan saved policies (MC1–7 within the Core Strategy in relation to these three settlements)*

#### 7.14 Sequential approach policy for town centre uses

The draft Core Strategy at present does not include a policy requiring applicants to submit a sequential assessment for planning applications for main town centre uses that are not in an existing centre, this is because PPS4 clearly sets out the requirements. Consultation responses have highlighted how reinstating national policy is not good practice.

##### *Commentary*

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 Local Planning Authorities' should 'prefer' applications for uses to be located in the town centre). In light of this, this 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, including suggested wording, is recommended in the South Somerset Retail Study Update 2010.

**Recommendation 40:** *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 covering the sequential approach in detail.*

#### 7.15 Retail Hierarchy

The draft Core Strategy Retail Hierarchy reflects the Settlement Hierarchy (Draft Policy SS1) and based on National Guidance and evidence from the Retail Study and the Settlement Role and Function Study, this should be revised.

The South Somerset Retail Study Update 2009 identifies Yeovil as the largest centre in South Somerset, followed by the town centres of Chard, Crewkerne, Ilminster and



Wincanton, and then Castle Cary, Somerton and Langport, followed by Bruton, Ilchester, Martock, Milborne Port, South Petherton and Stoke Sub Hamdon – effectively a 4-tier hierarchy. Furthermore, when applying the PPS4 definitions of centres to South Somerset, it clearly confirms that the South Somerset Retail Hierarchy differs from the Settlement Hierarchy as shown in table 9 below.

**Table 9; Comparison of retail and settlement hierarchy**

<b>Core Strategy Settlement &amp; Retail Hierarchy</b>	<b>PPS4 definitions of Retail Centres:</b>	<b>Suggested South Somerset Retail Hierarchy:</b>
Strategically Significant Town - Yeovil	Town Centres - principle centre in the Local Authority Area	Yeovil
Market Towns - Chard, Crewkerne, Ilminster, Wincanton, Castle Cary, Somerton and Langport / Huish.	Market Towns - in rural areas there are likely to be Market Towns and other centres of similar size and role, which function as important service centres, providing a range of facilities and services for <u>extensive</u> rural catchment areas.	Given that these centres are to serve an extensive rural catchment, the settlements of Chard, Crewkerne, Ilminster & Wincanton
Rural Centres - Bruton, Ilchester, Martock, Milborne Port, South Petherton and Stoke Sub Hamdon.	District Centres - groups of shops containing at least one supermarket and a range of non-retail services, such as banks and local public facilities such as libraries.	In the South Somerset context, this would be the equivalent of the smaller Market Towns of Castle Cary, Somerton & Langport / Huish Episcopi.
	Local Centres - a range of small shops of a local nature serving a small catchment. Typically, local centres may include, amongst other shops, a small supermarket, a newsagents, a sub-post office and a pharmacy. In rural areas, large villages may perform the role of a local centre.	Bruton, Ilchester, Martock, Milborne Port, South Petherton & Stoke Sub Hamdon fall into this category for whilst some have a bank and public facilities, they only have a small supermarket.
	Small parades of shops purely for neighbourhood significance are not regarded as centres for the purposes of PPS4.	

In terms of retail / service function, the Market Towns (as identified in Draft Policy SS1 and Draft Policy EP10) should be subdivided into Market Towns and District Centres for retail purposes and Policy EP10 be revised accordingly.

**Recommendation 41:** Amend retail hierarchy in policy EP 10 to reflect two-tier nature of market towns in retail terms.

#### 7.16 Locally derived Retail Thresholds Policy

Local authorities are invited, through the Local Development Framework (LDF) process, to set local thresholds for the scale of applications for edge-of-centre or out-of-centre development that will require an impact assessment. Without a locally derived threshold, impact assessments are required for planning applications for retail and leisure developments over 2,500 sq metres gross floorspace (for context Morrisons, Lysander Road, Yeovil has a total net sales area of 2,787 sq metres, whilst Asda is 3,325 sq metres). The draft National Planning Policy Framework retains this approach.

The research report, *The Impact of Large Food Stores on Market Towns and District Centres (1998)* showed that large food stores can have an adverse impact on market towns and district centres, but the level of impact is dependent on the local circumstances of the centre concerned. In particular, smaller centres, which are more dependent on convenience retailing to underpin their function, are more vulnerable to the effects of larger food store development at edge-of-centre and out-of-centre locations.

In the context of the above, whilst most of South Somerset's town centres are reasonably healthy (they are well used locally and have lower or the same vacancy rates compared to the national average apart from Wincanton, Langport & Somerton which have higher vacancy rates) they are relatively small, and given their size, and in some cases, lack of town centre sites, there is a need to protect the range of retail, service and other commercial facilities within these town centres from inappropriately scaled proposals and reinforce through appropriate development, their vitality and viability.

There is no exact science to define a methodology for establishing the scale of a local threshold. Planning for Town Centres: Practice Guidance on Need, and the Impact of the Sequential Approach (2009) that accompanies PPS4 specifies that, in setting floorspace thresholds for requiring an impact assessment, important considerations are likely to include the scale of known proposals, relative to the town centres. Therefore the basis to establish a scale for each geographic area is primarily based on the existing size of convenience retail units in each settlement and guidance from the Valuation Office's definition of foodstores (which are used to set rateable value).

In Yeovil, the retail study identifies a capacity of 924 sq m net (equivalent of 1320 sq m gross) to 2014, rising to 4017 sq m net (5739 sq m gross) to 2026. It is recommended that on the basis of the existing facilities in Yeovil, its capacity and its role and function in the retail hierarchy, the national threshold of 2,500 sq m should be applied. This would be used in conjunction with the sequential test that would guide development into the appropriate locations.

The Valuation Office defines hypermarkets / superstores (gross internal area over 2500 sq m) and large foodstores (gross internal area of 750-2,500 sq m), they do not subdivide or categorise shops below 750 sq m. It is recommended that the floorspace threshold in the Market Towns be set at 750 sq m gross, in line with the Valuation Office classification of a large foodstore. Therefore any applications for proposed retail development in edge-of-centre or out-of-centre locations that are in excess of 750 sq m gross should be subject to a retail impact assessment. The justification for this figure stems from the existing units in the Market Towns and the proposed retail strategy for

these as suggested in the South Somerset Retail study. The study highlights the need to focus on the town centres and maintain a constant market share approach for convenience retailing. It warns that future proposals for out-of-centre retail development could soak up significant amounts of identified capacity and should be carefully considered in terms of the potential harm to town centres. The Lidl store in Wincanton is 933 sq m gross internal area and it seems logical that a store of this size be subject to an impact assessment and hence the need for a local threshold.

Given that the smaller Market Towns (known as District Centres for retail policy purposes - Castle Cary, Somerton & Langport) perform a lesser retail / service role, and their town centres may be more vulnerable to the impact of a large foodstore, it is recommended that the floorspace threshold for District Centres be set at a lower rate. Establishing this a threshold requires a common sense approach, therefore using knowledge of store sizes that are present across the district and the size of the District Centres, it is suggested that a threshold of 500 sq m gross would be logical. Whilst the Tesco supermarket in Langport has according to the Valuation Office a 1,540 sq m gross internal area, which is considerably larger than 500 sq m, 500 sq m is the equivalent of twice the size of an average Tesco Express (in the District), and given the role and function of the District Centres, it is important that the impact of anything of this size on the existing centre can be assessed and addressed if needs be, as the impacts could potentially be negative. It is suggested that this threshold also be applied to in-centre proposals as the Retail Study was unable to provide capacity figures for these settlements based on their small size.

The Rural Centres (known as Local Centres for retail policy purposes - Bruton, Ilchester, Martock, Milborne Port, South Petherton & Stoke Sub Hamdon) generally have a range of small shops of a local nature serving a small catchment area. These centres are even more vulnerable to the impact of larger scale services and facilities. On the basis of the fact that a Tesco Express is roughly 250-260 sq m, it is recommended that the retail floorspace threshold in the Local Centres be set at 250 sq m gross.

**Recommendation 42:** *Establish a retail threshold policy for South Somerset that seeks retail impact assessments at the national level (2,500 sq m) for Yeovil, 750 sq m for market towns (in retail hierarchy terms), 500 sq m for District Centres and 250 sq m for local centres.*

#### 7.17 Presumption against Major new Regional Shopping Facilities

The necessity of this policy is called into question

##### *Commentary*

It is considered that it can sit equally as supporting text to policy EP10 that establishes the retail hierarchy

**Recommendation 43:** *That policy EP11 seeking the presumption against Major new Regional Shopping Facilities be deleted and incorporated into supporting text in draft Core Strategy policy EP10.*

## 7.18 Policy TA1: To include reference to Rail Freight

It has been suggested that greater emphasis should be given to the potential for rail freight in the Core Strategy.

### *Commentary*

Increasing freight traffic by rail can reduce CO<sub>2</sub> and HGV traffic on the strategic road network and there should be a general presumption for the protection of the rail network for future freight use. Modern rail freight can be very effective when rail freight terminals with dedicated sidings and / or container terminals can be designed into developments that manufacture or distribute goods. However facilities for rail transfer are needed at / near the point of origin of the goods and at the destination and this and the nature of the goods should be considered in any feasibility. The locations and layout of the rail stations in South Somerset are not always conducive to modern freight operation. The resulting additional lorry journeys where they occur on rural roads would impact on local congestion and it's difficult to see how this could be achieved without additional major highway works in often-sensitive locations. Rail Freight is therefore much better targeted where suitable Rail Freight hubs can easily be constructed to minimise the need for road transport or enable easy road / rail interchange.

In respect of existing stations it is important to protect opportunities where there is realistic potential. Whilst this is the case at Pen Mill & Castle Cary stations, it is likely to prove difficult to achieve at other stations in the district.

**Recommendation 44:** *Amendment to policy TA1 to include reference to Rail Freight and encourage Rail Freight terminals where feasible.*

## 7.19 Policy TA2: Travel Plans

Draft policy does not include specific reference to Use Classes B2, C2, D1, D2 and Sui Generis uses

### *Commentary*

It is important not to imply that these classes do not require travel plans, therefore it would be helpful to clarify this point. SCC's draft guidance on Travel Plans (Enabling Smarter Travel through Travel Planning in Somerset) contains appropriate wording (p.16) - "any development site with 25 or more car parking spaces or more than 1000 sq m of floor area could be required to produce a travel plan as a general principle, which all occupiers will be expected to take part in delivering. This is used as a basic threshold to negotiate and determine a requirement for a travel plan document for land uses not listed above. However it is considered that the expectation that all occupiers would take part is unenforceable and so reference to "all occupiers" taking part should be removed from the policy

**Recommendation 45:** *Amend policy TA2 to ensure it is applicable to all forms of development and Use Classes that meet the minimum thresholds of 25 or more car parking spaces or more than 1000 sq m of floor area but that reference to "all occupiers" taking part should be removed from the policy.*

## 7.20 Car Parking Standards

There was some support for the proposed flexible approach to parking standards. New housing development should include adequate off-street parking, particularly flats in Yeovil, as insufficient parking has caused on-street problems. It should be accepted that every household will have at least 1 car. Much can be achieved by being creative with parking provision in terms of design, locations, pricing etc. The need for high quality, secure and convenient cycle parking and suitable motorcycle parking should be noted.

### *Commentary*

It is logical and appropriate to apply the Highway Authority's car parking standards in South Somerset. A draft update of existing standards has been received and it is considered that the more relaxed proposed residential standards and the more evidenced based ones for non-residential operational parking standards can be supported. A representation to this effect on standards has gone off to Somerset County Council already from the relevant Portfolio Holder following a member workshop. The timing of the Core Strategy process should allow this Authority to re assess their support for accepting Highways Authority standards in the light of receipt and consideration of the finally approved standards.

<b>Recommendation 46:</b>	<i>Pursue the current Core Strategy policy to apply the updated Highway Authority's standards but review this upon receipt of the finally approved standards.</i>
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## 7.21 Viability of Open Space Standards in Light of Open Space Strategy

The current proposed policy contains various standards for open space provision, which is considered to lack flexibility throughout the plan period. Whilst including the Standards allows easier reference without having to look at supporting evidence, excluding them allows a more flexible and adaptable approach. The Standards have been arrived at through application of Government Policy through the PPG17 Assessment. Existing Strategies that currently inform the Core Strategy are written to cover the next few years (i.e. Open Space Strategy is adopted up to 2015) after which they will be reviewed. The plan period covers the next 15 years. Including the standards in the policy binds those standards over the length of the plan period. Having the standards informed by separate documents allows for the opportunity to review individual aspects of those standards without the need to review the Core Strategy Policy, which will need to go through the full consultation process before it can be changed.

The majority of objections relate to the level of requirements for open space provision. The comments made fall into 4 broad categories:

1. Lack of published standards
2. Wording and requirements too complicated to understand
3. Standards not comprehensive enough
4. Does not cover provision of facilities without development
5. Requirement for types of development to contribute too stringent
6. Requirement for types of development to contribute not comprehensive enough

## Commentary

PPG17 states "Planning policies should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. The information gained from this assessment of needs and opportunities should be used to set locally derived standards for the provision of open space, sport and recreational facilities." This is in line with the proposed approach to remove the actual standards from the policy and to make reference to the separate standards in the PPG17 Assessment. The full assessment of needs will remain within the PPG17 Assessment and the Core Strategy policy will support the provision of facilities in line with those needs.

**Recommendation 47:** *Remove the PPG17 standards from policy HW1 and HW2 and cross-refer to the Open Space Strategy and PPG17 Assessment for Standards.*

## 7.22 Climate change

The representations received included comments about the 10% renewable energy target which was felt to be too inflexible, as this reduction in CO<sub>2</sub> emissions can be achieved using energy efficiency measures without the need to use decentralised and renewable energy technologies. Some felt that the sustainable buildings requirements (Code for Sustainable Homes, BREEAM) are contrary to national policy as there are no exceptional local circumstances to justify this, and there should be more flexibility to allow feasibility and viability to be assessed on a site-by-site basis. The Environment Agency felt that flood risk should be a separate policy to give it a stronger position, and should refer to the Exception Test; although there were also comments that the policy should be deleted altogether as it replicates national policy. Further detail was also requested on biodiversity issues.

## Commentary

The Government's 'energy hierarchy' does prioritise energy efficiency, and Building Regulations relate to CO<sub>2</sub> reductions rather than renewable energy. However renewable and low carbon technology should still be supported, although some clarity would be useful in relation to Building Regulations requirements. The Code for Sustainable Homes requirements correspond to the energy standards that would be required regardless through changes to the Building Regulations – the proposed amendments to the definition of 'zero carbon' should be reflected when finalised. As worded, the Code for Sustainable Homes and BREEAM will only be required unless it is proven not to be feasible or viable. It is not agreed that simply moving flood risk to a separate policy would give it a stronger policy position, although some further 'local' detail and reference to the Exception Test should be added. Biodiversity is covered specifically in Policy EQ3 – some cross-reference would be useful.

**Recommendation 48:** *Clarify that 10% renewable and low carbon energy target is in addition to Building Regulations requirements.*

*Await further confirmation of 'zero carbon' definition from Coalition Government – amend to Code for Sustainable*



*Homes level 5 rather than 6 in light of proposals.*

*Add reference to flooding Exception Test, and further detail on the application of the Sequential Test.*

*Add detail on biodiversity and cross-refer to specific biodiversity Policy EQ3.*

## 7.23 Additional Policy Changes

### Policy YV2

Primary Care Trust sought mention in policy of need for medical facilities within the urban extension.

#### *Commentary*

This representation reflects the Infrastructure Delivery Plan.

**Recommendation 49:** *Refer to need for medical facilities as part of the land requirement for the urban extension.*

### Policy YV4 (and Policy CV4)

Representations from Somerset County Council wish to remove the restriction on the seeking of the provision of cycle and pedestrian route facilities solely within 400m of a development site from prospective developers in Yeovil and Chard.

#### *Commentary*

It is proposed to accept this amendment that makes for greater potential to seek provision further afield as conditions suit to link development to wider cycle and pedestrian routes in existence.

**Recommendation 50:** *Amend policy by removal of the 400-metre restriction to seeking appropriate provision of cycle and pedestrian links to development.*

### Policy YV5

Concerns raised regarding need for adequate parking in the urban extension despite its eco status.

#### *Commentary*

It is recognised that a limitation to car parking provision in the urban extension would be at odds with the emerging Somerset County Council car parking strategy that is recommended for acceptance as part of the Core Strategy and which shows less restrictive residential parking standards.

**Recommendation 51:** Amend policy by deleting the word “limited” from the 4<sup>th</sup> bullet point of the policy.

Policy HG7

Replace word scale with size.

*Commentary*

Accept representees view that size is the appropriate word to use.

**Recommendation 52:** Amend policy HG7 by replacing “scale” with “size”.

Policy HG 8

Reference should be made for completeness to potential impact of dwellings on landscape character, visual amenity and ensure no adverse impact on AONBs.

*Commentary*

An appropriate change.

**Recommendation 53:** Amend policy HG8 by reference to landscape character, visual amenity and AONBs.

Policy EP2

Reference to other out of town centres was unnecessary and misleading.

*Commentary*

Agreed.

**Recommendation 54:** Remove reference to other out of town centres (bullet three).

Policy EP4

Conflict between EP3 and 4 brought to attention in that EP4 addressing conversion or re use of buildings in the countryside is less prescriptive than EP3 in safeguarding employment land. Also clarification of third bullet by adding reference to buildings being extended as well as converted

*Commentary*

Points are well made.

**Recommendation 55:** *Revise EP4 so as not to contradict EP3 and add the words “or extension” after “conversion” in third bullet point.*

EP7

Wording should be simplified in relation to national directive for protection of countryside and encouraging tourism in existing buildings where possible

*Commentary*

Points well made.

**Recommendation 56:** *Amend policy to be simpler and refer to promotion of tourism in existing buildings.*

EP9

Wording of 2<sup>nd</sup> bullet re protecting internationally designated sites should be expanded to include nationally designated sites for wildlife and landscape

*Commentary*

Point well made.

**Recommendation 57:** *Amend policy to protect nationally designated wildlife sites and landscape sites also.*

Policies EP10 – 14 – retail policies

All should be amended to reflect Planning Policy Statement 4 (PPS4) and especially regarding other town centre uses being referred to.

*Commentary*

Points well made and are appropriate updating following publication of final PPS4.

**Recommendation 58:** *Amend policies EP10 – 14 (note EP11 recommended for deletion elsewhere) to incorporate references as appropriate to PPS4.*

Policy EP15

Make clear that the centres to which is refers are neighbourhood centres in terms of PPS4 terminology.

*Commentary*

Point well made

**Recommendation 59:** *Amend wording and title to clarify that the policy applies to neighbourhood centres.*

Policy EP16

Cultural facilities should be added to those, which the policy seeks to protect.

*Commentary*

Point well made.

**Recommendation 60:** *Add cultural facilities to the facilities being protected.*

Policy TA 1

16 amp not 13 amp charging points are now the norm. Clarity should be given of how Green travel vouchers should be operated and the policy should apply to a wider list of land uses.

*Commentary*

Points well made.

**Recommendation 61:** *Amend ref to 13 amp-charging points to 16 amps and clarify policy on how green travel vouchers should be operated and on which land uses.*

Policy TA3

Minor clarification of wording requested.

*Commentary*

A grammatical correction.

**Recommendation 62:** *Accept clarification to improve grammatical structure of the policy.*

Policy HW4

Policy objectives need to be amended to be clearer.

*Commentary*

Minor clarification.

**Recommendation 63:** *Amend policy to clarify objectives.*

Policy EQ3

Need to ensure that habitats used by bats and other wildlife are maintained and landscape designations of importance are suitably protected.

*Commentary*

Relevant points in context of Bracket's Coppice Special Conservation Area in particular.

**Recommendation 64:** *Add an additional bullet to the policy to ensure that the habitat features that are used by bats and other wildlife are maintained so that the design of development does not cause severance or is a barrier to movement and ensure that relevant wildlife and landscape designations are protected.*

Policy EQ7

Policy should have stronger reference to protection of landscape character.

*Commentary*

Point well made.

**Recommendation 65:** *Amend policy to provide stronger reference to wildlife and landscape designations.*

## 8. Drafting of the Core Strategy Proposed Submission Document

Upon confirmation of the PMB's recommendations by District Executive and Full Council the final wording of the actual Core Strategy Proposed Submission Document can be concluded. In order to progress rapidly to the next stage of the public consultation process it is proposed that the members delegate the final wording of the document, its presentational style, graphics and maps to the PMB.

**Recommendation 66:** *That Members delegate to PMB approval of the revised content of the Core Strategy prior to and for public consultation as the Core Strategy Proposed Submission Document*

## 9. Sustainability and Appropriate Assessment

Sustainability Appraisal (SA) involves the identification and evaluation of the impacts of the Core Strategy upon social, economic, and environmental objectives – i.e. its compatibility with the three strands of sustainable development. Under the Planning and Compulsory Purchase Act 2004, the Core Strategy must be subject to SA. This incorporates the requirements of European law.<sup>9</sup> An SA report was published for consultation alongside the draft Core Strategy (incorporating preferred options) in October 2010. This included the SA outcomes of the preferred options policies, directions of growth at the main settlements, and options for the distribution of development across the District.

Over 80 comments were made specifically on the Sustainability Appraisal report, the vast majority of which concerned the proposed Yeovil urban extension. The general comments included: development should be spread throughout the district as this would negate the need for urban extensions and the consequent adverse effects on the main towns; the SA does not comply with the necessary regulations; and a lack of discussion of different types of effect and evidence to justify the findings. There were also comments on the appraisal of the directions of growth at Chard, Crewkerne, Wincanton and Somerton. As previously explained, in response to comments received further SA work was carried out to assess the effects of proposing both higher and lower proportions of development at Yeovil which informed the final decision on the scale of growth appropriate for Yeovil. The other comments will be used, as appropriate, in undertaking the SA of the Core Strategy Proposed Submission plan. It is considered that there are no substantive objections that cannot be satisfactorily mitigated in the development of revised policies and proposals.

The Sustainability Appraisal report will be written up consistent with statutory requirements, including the key findings of the Core Strategy policy appraisal and any recommended mitigation measures to improve the sustainability of the policies. As with the Core Strategy 'Proposed Submission' plan, it is considered appropriate that the SA report be delegated to Project Management Board for approval, followed by Full Council. This is a practical approach given that the Sustainability Appraisal actually informs the detailed wording of policies and proposals.

**Recommendation 67:** *Consideration of the SA report is delegated to the PMB for approval in association with the detailed Core Strategy Proposed Submission text.*

European law also requires Habitats Regulations Assessment (HRA), in order to assess the potential impacts of development upon 'European' designations and ensure there are no unacceptable adverse impacts on these sites. Therefore, an assessment of the Core Strategy policies upon the Somerset Levels and Moors Special Protection Area / Ramsar, and Bracket's Coppice Special Area of Conservation (located south west of Crewkerne, just outside the District) has been carried out. The Somerset Levels and Moors HRA was published for consultation alongside the Core Strategy.

The RSPB submitted a comment disagreeing that recreational pressure is currently low, as stated in the Somerset Levels and Moors HRA, because part of the site experiences high levels of disturbance, and mitigation measures should be included in the Core Strategy to reduce recreational pressure on the Somerset Levels and Moors SPA /

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<sup>9</sup> Directive 2001 / 42 / EC, transposed into UK law by the SEA Regulations 2004.



Ramsar. However, statutory consultees at Natural England and the County Ecologist did not share these concerns, and the recommendation is not to agree with RSPB objections to the findings of the HRA, subject to final confirmation by consultants who will be reviewing the HRA to be undertaken to inform the 'Proposed Submission' Core Strategy. This would include clarification with Natural England and the County Ecologist that levels of disturbance are currently low, and resolving the difference in opinion between the RSPB and Natural England and the County Ecologist.

**Recommendation 68:** *The objections of RSPB to the HRA are not accepted and the HRA report to accompany the final revised publication plan is delegated to Project Management Board for approval in association with the detailed Core Strategy Proposed Submission text.*

## 10. Equalities Impact Assessment

The Council are required to undertake an Equalities Impact Assessment (EIA) of the emerging policies and proposals within the Core Strategy.

The Equality Analysis on the emerging Core Strategy, including the Yeovil Urban extension has been undertaken in advance of implementation, with a view to submission alongside the revised version of the Core Strategy (The Proposed Submission Document).

As part of the Equality Analysis process on the emerging Core Strategy, full and comprehensive engagement has been carried out with the general public as well as groups and forums representative of the protected characteristics. In addition to this, specific consultation has been undertaken with the South Somerset Equalities Steering Group (ESG). The ESG is chaired by a Cllr who is the Portfolio Holder for Equalities, and includes attendance by a range of community groups who represent the protected characteristics. It is the ESG's responsibility to oversee the successful functioning of the Equality Analysis process, acting as a 'critical friend' in assessing the likely impact on proposed strategies, policies, services and functions on equalities for staff and customers. The Equality Analysis on the Draft Core Strategy will be presented to the ESG in March 2012.

The EIA will be written up consistent with statutory proposals and in accordance with South Somerset District Council standard practice. It is considered appropriate that the EIA be delegated to the PMB for approval. This is a practical suggestion given that the EIA actually informs the detailed wording of policies and proposals.

**Recommendation 69:** *Consideration of the EIA is delegated to the PMB for approval in association with the detailed Core Strategy Proposed Submission text.*

## 11. National Planning Policy Framework (NPPF)

The Government has published a draft National Planning Policy Framework to present national planning policy in one document (of 52 pages). The consultation period ended on 16<sup>th</sup> October with an initial indication that a final version will be published before the year-end although at the time of writing the final version had yet to be published.

The National Planning Policy Framework broadly reflects the existing Planning Policy guidance albeit in summary form but there are some significant changes. In relation to the Core Strategy the key changes are

- NPPF refers to an Environmental Strategy – we do not currently have one.
- NPPF does not protect employment land in it's own right
- There is a need to clarify in the supporting text the role of social rented and affordable rent.
- There is no longer a Brownfield land target - draft policy will need to be reviewed.
- There will be a need to review PPS policies that are not replicated in the NPPF.

The latest indication from the Government department of communities and local government is that the final Framework will be out before the end of March of this year (although possibly as a further consultation document). It is suggested that the implications of the NPPF for the Core Strategy be delegated for consideration by PMB and reported to Full Council prior to authorisation of the final Core Strategy Proposed Submission plan for publication.

<b>Recommendation 70:</b>	<p><i>Proceed with the Core Strategy and delegate to the PMB consideration of the final version of the NPPF (if received prior to 31<sup>st</sup> March 2012) and its implications for the Core Strategy subject to authorisation by Full Council.</i></p> <p><i>Should the NPPF not be received in final form by 31<sup>st</sup> March 2012 then PMB be delegated to review the likely timescale of receipt and submit a report to Full Council on how to deal with its receipt in the context of the Core Strategy timescale.</i></p>
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## 12. Next Steps

The recommendations of the District Executive will go forward for consideration to Special Full Council on 23<sup>rd</sup> April.

Upon endorsement of the recommended changes to the Core Strategy the PMB will finalise the reworded Core Strategy Proposed Submission draft. The revised Core Strategy will be deposited for statutory consultation complete with the IDP and accompanying SA and AA reports and EIA. This is anticipated to take place in May and June prior to Examination by a Planning Inspector expected towards the year-end after representations have been received and collated for the Examination Inspector's consideration.

<b>Recommendation 71:</b>	<p><i>Note and endorse the next steps for progressing the Core Strategy.</i></p>
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