

# South Somerset Proposed Submission Local Plan 2006-2028

## Consultation Statement



June 2012

## Contents Page

	Page no	
1	Introduction	1
2	Core Strategy 'Issues and Options' consultation	2
3	'Draft Core Strategy (incorporating preferred options)' consultation	9
4	Next steps	22

## List of Appendices

**Appendix 1:** Issues and Options Consultation Newsletter

**Appendix 2:** Issues & Options Consultation Satisfaction Questionnaire

**Appendix 3:** Issues & Options Schedule of Consultation Responses

**Appendix 4:** Issues & Options Report (including Appendices) to District Executive 3<sup>rd</sup> December 2009 (including Minutes of the Meeting)

**Appendix 5:** Draft Core Strategy, Early Engagement Workshops - Workshop Notes and List of Attendees

**Appendix 6:** Draft Core Strategy, Report on Public Engagement October to December 2010

**Appendix 7:** Draft Core Strategy, Examples of the Display Boards (Yeovil, Ansford & Castle Cary and Milborne Port)

**Appendix 8:** Draft Core Strategy, Matrix of Consultation Responses (Parts 1-5)

To save paper, we haven't printed a full list of the Appendices, as this would be in excess of 1,000 pages. It is available on the Council's website and a hard copy is available at the Council Offices in Brympton Way, Yeovil.

If you would like to discuss this issue please telephone the **planning policy team** on **01935 462462**

# 1. Introduction

- 1.1 This document sets out how South Somerset District Council has undertaken consultation in preparing its 'Proposed Submission' Local Plan. It provides an overview on the following:
- who was invited to make representations,
  - how they were invited to do so,
  - a summary of the main issues raised by the representations, and
  - how these have been addressed in the Local Plan.
- 1.2 In doing so, this consultation statement complies with the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), and South Somerset's Statement of Community Involvement (SCI). The SCI outlines that the Council is committed to effective community engagement, and seeks to use a wide range of methods for involving the community in the plan making process.
- 1.3 Table 1 below sets out the key stages of Local Plan preparation undertaken by the Council (with the final stage in blue yet to be concluded).

**Table 1: Preparing the Local Plan**

<b>Preparing Issues and Options (June 2007-August 2008):</b> Early engagement through issues raised by Sustainable Community Strategy
<b>Consultation on Issues and Options (March-May 2008):</b> Core Strategy Issues and Options document consultation
<b>Preparing the Draft Core Strategy (incorporating Preferred Options) (July 2009-March 2010)</b> Front loading engagement with Town and Parish Councils – scale and location of growth
<b>Consultation on the Draft Core Strategy (incorporating preferred options) – (October-December 2010):</b> Public consultation including wide ranging consultation exercise including public exhibitions, events with hard to reach groups, householder leaflet, public relations campaign
<b>Preparing the 'Proposed Submission' plan (January 2011-May 2012)</b> Consideration of representations, further evidence review and redrafting
<b>Consultation on the 'Proposed Submission' Local Plan (June-August 2012):</b> Six-week public consultation on Proposed Submission Local Plan 2006 – 2028.

## 2. Core Strategy 'Issues and Options' consultation

- 2.1 The Issues and Options document was published for consultation between 11<sup>th</sup> March 2008 and 25<sup>th</sup> April 2008, with Town and Parish Council's having an extension until the 30<sup>th</sup> May 2008.

### Consultation Aims

- 2.2 The main aim of the Issues and Options consultation was to identify and understand the key planning issues that would affect the community over the plan period and illustrate how the plan might best address these issues. The consultation allowed ample opportunity for key stakeholders and the wider public to have their say on some early options, such as the scale and distribution of development.
- 2.3 Given the relationship between the Local Development Framework (LDF) and the Sustainable Community Strategy (SCS) (LDF being a delivery mechanism for the spatial elements of the SCS) the key issues addressed in the Issues and Options consultation were taken from those identified through the Sustainable Community Strategy consultation (July 2006 - March 2008).

### Who we consulted

- 2.4 The District Council consulted the general public, and other groups registered on our consultation database (which now includes over 2,000 bodies and individuals and is regularly updated on request and as required) including the following bodies:
- **Specific Consultation Bodies** (those we have to consult to meet the statutory requirements) such as adjoining councils and agencies such as the Environment Agency, English Heritage, Natural England, the Ministry of Defence and utility providers such as Wessex Water.
  - **General Consultation Bodies**, these include voluntary bodies and groups which represent the interests of different religious, racial, ethnic or national groups, local business groups and organisations that represent the interests of those with disabilities.
  - **Other Consultees**, these are those that have expressed a desire to be involved such as agents, developers and landowners (on the consultation database) and clubs and societies, charities and special interest and hard to reach groups. A full list of consultees is set out in Appendix 2 of the Statement of Community Involvement (July 2007).

### How we consulted

- 2.5 The Consultation was formally advertised by notice in the local press and a press release produced. An Issues and Options consultation newsletter (see Appendix 1) was also distributed to every household in the District with the South Somerset News (the District Council's newsletter) in March 2008.
- 2.6 Copies of the Issues and Options report were placed in the Council's offices, community information points and libraries, and was available on the Council's website. Copies were made available in audiocassette, or in Braille on request.

- 2.7 During the formal consultation period, four consultation workshops were held with town and parish councils, one in each of the District's areas:
- Area North, 3 April 2008, Long Sutton Golf Course, 6.30-8.30pm
  - Area South, 8 April 2008, Brympton Way, 6.30-8.30pm
  - Area West, 9 April 2008, Guild Hall, Chard, 7.00-9.00pm
  - Area East, 30 April 2008, Churchfields 6-9pm
- 2.8 An internal consultation workshop with Members and officers (Portfolio Holder Briefing Workshop) was also held.
- 2.9 Following the consultation period, all consultees were sent a Consultation Satisfaction Questionnaire (see Appendix 2) to establish the level of satisfaction with the document and the methods of consultation.
- 2.10 1,300 questionnaires were distributed, with 86 responses (a 6.6% response rate). In summary the following comments were received:
- 73% of respondents agreed or strongly agreed that SSDC made the consultation available in locations appropriate for them to be able to contribute easily. 3.5 % strongly disagreed with this statement.
  - 41% of respondents agreed or strongly agreed that the online response facility was easy to use. 22% disagreed or strongly disagreed with this statement.
  - 50% of respondents agreed or strongly agreed that the Core Strategy Issues and Options documents were easy to understand, whilst 24% disagreed or strongly disagreed.
  - Overall, 50% of respondents thought that the Core Strategy Issues & Options consultation was successful.
- 2.11 As a result of the responses received, efforts were made to improve the design, layout and language of future documents. The documents are now 'proof read' by non-planners to ensure they are written in plain English and efforts are made to keep documents concise and avoid repetition. Guidance is given on how to complete comments in electronic form on the Council's website.

### **Summary of main issues and how these were addressed**

- 2.12 204 people or organisations responded and 8,131 individual responses were recorded. The Core Strategy Issues and Options Report (December 2009) summarises the comments made and the Council's response (see Appendix 3), which was considered at the Council's District Executive on 3 December 2009.
- 2.13 Appendix 1 of the 3 December 2009 District Executive report (see Appendix 4) illustrates that from those key issues, a number of policies and/or proposals were identified as required for inclusion in the Draft Core Strategy (incorporating Preferred Options). The main issues and how these were addressed are summarised by chapter in the following paragraphs.

#### Vision and Strategic objectives

- 2.14 67% of respondents supported the spatial vision, but a common concern was that the vision failed to consider the role of the Market Towns (in particular

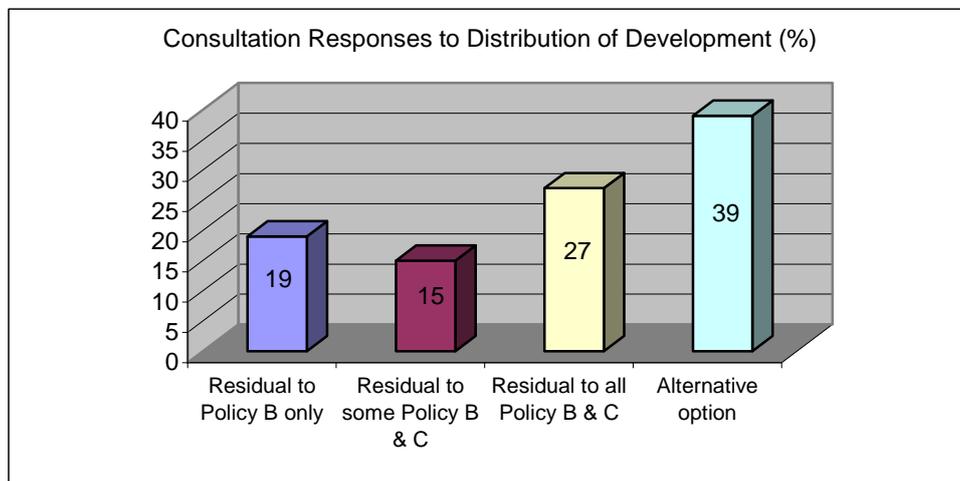
Chard), or clarify the 'area of search' for the location of the Yeovil urban extension (as required by the RSS).

- 2.15 The spatial vision was amended (for the Draft Core Strategy) in light of the consultation responses to illustrate the role and function of the Market Towns and Rural Centre's in the settlement hierarchy.
- 2.16 The location of the Yeovil urban extension was identified as requiring further work, and was the focus of a "cluster meeting" with Town and Parish Council's (Nov 2009 - March 2010) (a more detailed explanation of a cluster meeting is given on page 10) . Whereas given the advanced state of the Chard Urban Regeneration Framework, it was considered appropriate to identify growth proposals and policies of a strategic nature from the Urban Regeneration Framework and take them forward through the Core Strategy.

### Strategy

- 2.17 Whilst only 40% of respondents agreed with the District-wide and Yeovil level of growth prescribed in the Regional Spatial Strategy, at this time the Core Strategy was required to reflect the emerging RSS figures.
- 2.18 Consultees were asked to identify settlements that should be classified as Market Towns (RSS, Policy B settlements) and Rural Centres (RSS, Policy C settlements), and a range of suggestions were made as to the status of settlements. Consultees were also asked to suggest how best to distribute the non-Yeovil dwellings, as set out in Figure 1.

Figure 1: Consultation Responses to Distribution of Development



- 2.19 The majority of respondents suggested an alternative option to the three identified options (of which distributing the residual, non-Yeovil growth to all Policy B & C settlements was the most popular, 27% of respondents opting for this).
- 2.20 The comments made on the role of settlements and the distribution of growth to these settlements were used in line with the evidence base, Sustainability Appraisal and further consultation with town and parish council's at the cluster workshops to formulate a preferred option for consultation at the Draft Core Strategy stage.

## Housing – Affordable housing

- 2.21 Options were put forward for the number of dwellings that should trigger an affordable housing contribution, the most popular option was 15 dwellings or more (29%), but 37% of respondents suggested another option not suggested, such as 50% of all sites of 4+ sites should be affordable or a locally justified figure. In response to the consultation, which offered a range of options, a viability review was undertaken to establish if a lower threshold (locally justified) would be appropriate.
- 2.22 A number of options were also put forward as to what percentage of affordable housing should be sought in qualifying developments. 46% of respondents suggested an alternative option to the 6 offered. Of those 6, 27% of respondents thought that maintaining a target of 35% across the District would be the most favourable approach. In response to this, the 35% was carried forward with a view to review the target before submitting the Local Plan because of concerns raised over viability.

## Housing – specialist housing

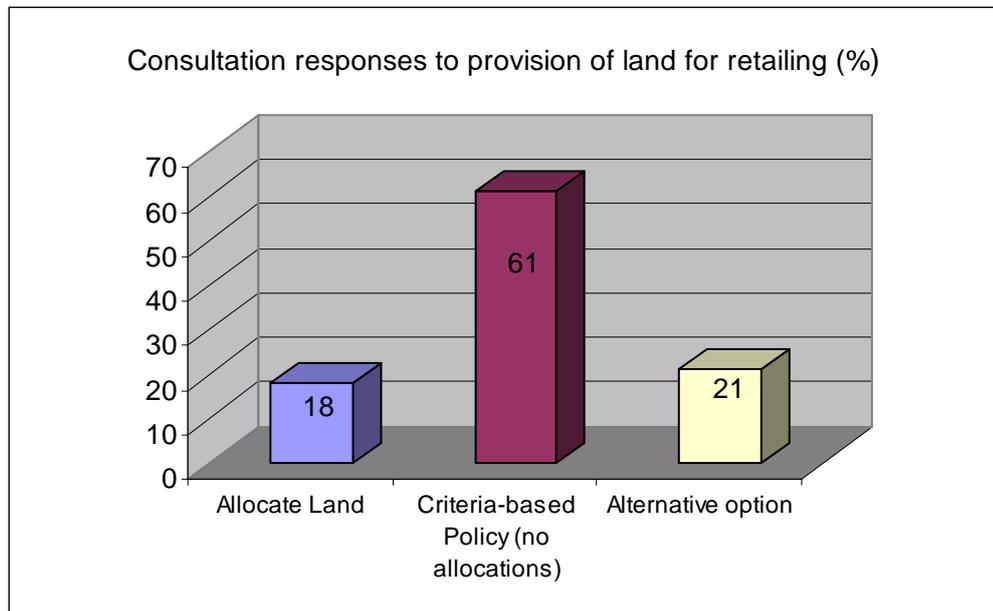
- 2.23 Consultees were asked whether elderly people wanted specialist housing, and if so what type. There was general support for specialist housing, ranging from sheltered accommodation, to bungalows to lifetime homes. Whilst at the Issues and Options stage it was not considered suitable to include a policy in the Core Strategy, due to lack of evidence, further consultation at later stages of the Local plan, justified the need for a policy.
- 2.24 Through 'other issues' it was raised that housing growth should not be addressed in isolation and should be considered alongside employment opportunities, this was accepted. The Local Plan strategy for growth, balances the provision of jobs and homes.

## Economic Prosperity

- 2.25 The RSS identified the amount of jobs that should be provided in the Yeovil Travel to Work area and the District. Respondents were asked to consider how the local authority should be providing a range of business units. Whilst, the most popular option (38%) was that small, advanced industrial units should be provided for small businesses, it was clear that respondents felt that setting out prescriptive requirements for employment sites was not the correct approach. Each site is different and has its own cost associated with it, the market should be left to determine what is required. As a result of the consultation it was considered that a prescriptive policy would inhibit development, and the key issue that should be addressed is the identification of strategic employment land provision.
- 2.26 Consultees were asked under what circumstances should employment land and premises be protected, and whether some should be allowed to be used for alternative uses. There were a range of responses, but on the whole, respondents supported the protection of employment land and thought that alternative uses should be fully justified (as identified in the RSS). This approach was carried forward.

2.27 Three options were put forward for the provision of land for retail uses are set out in Figure 2.

Figure 2: consultation responses to provision of land for retailing



2.28 The majority of respondents (61%) were in favour of a criteria based approach to locating new retail development, which allows flexibility, but needs to be evidence based. This approach was accepted.

2.29 Given the rural nature of the District and the role of agriculture, there was a large response to the criteria against which farm diversification schemes should be assessed (179 comments). Respondents suggested alternative criteria to that identified, and these were considered further with colleagues in the Development Management team to inform the Draft Core Strategy policy.

2.30 Respondents raised the need for a tourism policy in the 'other issues' section, at the time it was felt that there was sufficient policy guidance contained in the RSS and 'Good Practice Guide on Planning for Tourism'. Since then, the intention to revoke the RSS has led to the inclusion of a tourism policy, with consideration of the comments made at the Issues and Options stage.

### Transport and Accessibility

2.31 Consultees were asked to consider which traffic demand management measures would reduce traffic congestion in South Somerset. Measures to improve travel choice were the most popular option (16%) with congestion charging being the least popular (1%), with varying degrees of support for the other options (workplace parking levies, parking strategies, management of road space, Travel Plans, car sharing clubs, school travel planning, visitor plans & public transport information systems). In light of the responses, it was considered that due to the diversity of the district, flexible policies would be required to respond to that diversity, and certain measures would only be viable in Yeovil. Further work was required, including awaiting the findings of the Yeovil Transport Strategy Review 2.

- 2.32 Consultees were asked to consider if the existing supply of car parking spaces in Yeovil could be reduced to allow some car parks to be redeveloped for other uses. There was a strong negative response to this suggestion, for economic reasons (impact on Town Centre trade) and therefore this suggestion was not pursued. Since then, Somerset County Council undertook a survey in May 2011 which illustrates that whilst there is adequate car parking provision at the present time, with the Local Plan development proposed, there could be a shortfall of approximately 1,000 spaces by 2026.
- 2.33 A suggestion in the 'other issues' section was that car-free live/work developments should be encouraged in the countryside, and the inclusion of an exceptions policy was sought. Whilst the premise behind car free housing was considered laudable, the option was not carried forward as it conflicted with national guidance.

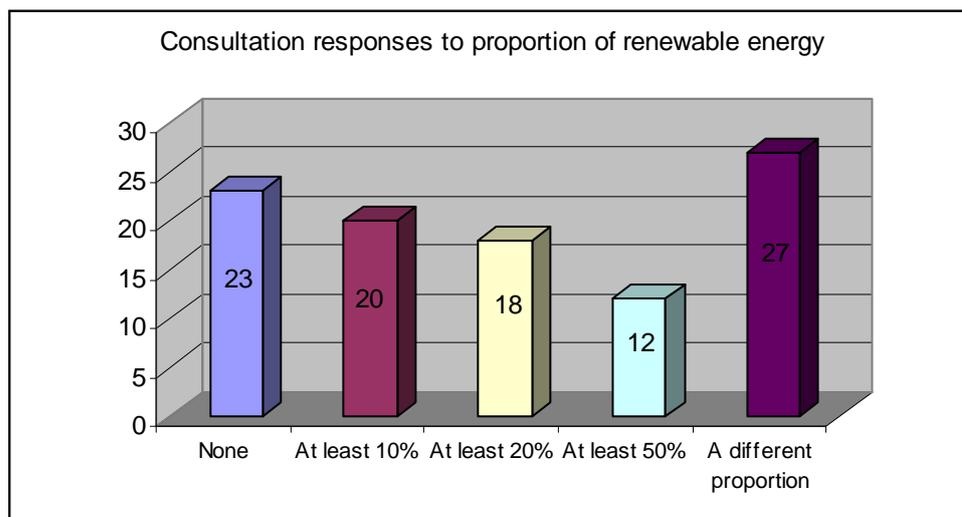
### Health and well being

- 2.34 The consultation on this section featured heavily on the Consultees were asked to consider how new development should contribute towards the provision of new facilities, for example, should an amount per dwelling be required. They were asked if any development should be exempt from such a levy, and if a threshold should be applied for on-site provision. Upon further examination of the issue in response to the consultation, uncertainties associated with the Community Infrastructure Levy, and the need to produce an Infrastructure Delivery Plan, meant that the inclusion of a policy at that stage in the process would be inappropriate, given the further consultation that was required to establish the issues.

### Environmental Quality

- 2.35 Consultees were asked to consider how much energy consumption in new development, should be generated from on-site renewable sources or low carbon energy supply, as reflected in Figure 3.

Figure 3: consultation responses to proportion of renewable energy



- 2.36 There was no real majority view from the consultation responses, but it was clear that issues of viability and the need for flexibility were of concern to

respondents. In light of these, it was considered that further work was required to produce evidence to establish the feasibility of a local target.

- 2.37 Respondents were also asked to consider the threshold at which development would need to contribute towards on-site renewable energy provision. 57% of respondents felt that the requirement should be applied to all sites, which was at odds with the RSS, therefore it was considered that further work was required to inform the threshold to which the target applied.
- 2.38 In the 'Other Issues' section, there was concern that flooding, the Strategic Flood Risk Assessment (SFRA) and water quality/resources issues had only been mentioned fleetingly. The SFRA was completed after the Issues and Options report was published, and was used to inform directions of growth and promote the use of Sustainable Urban Drainage Systems (SuDS).

### **3. 'Draft Core Strategy (incorporating preferred options)' consultation**

#### **Consultation aims**

- 3.1 The aims of the consultation were:
- To deliver a programme of public and local stakeholder consultation and involvement, in accordance with the South Somerset Statement of Community Involvement, and SSDC Equalities scheme, and Planning Policy Statement 12: Local Spatial Planning (now cancelled but relevant at the time).
  - Test preferred options for the settlement hierarchy, locations for growth and major policies.
  - Build the Council's reputation for high quality engagement programmes and continuous community involvement in shaping sound policies over spatial matters that affect peoples' lives.
  - To raise broad public awareness and interest in planning in the future – through the LDF, and development management.
  - To incorporate work undertaken through the Chard Vision, local community planning and the South Somerset Community Strategy.

#### **Who we consulted**

- 3.2 All those on the consultation database were notified as set out earlier in para 2.4.

#### **How we consulted**

##### Early Engagement Workshops – July 2009

- 3.3 Early engagement on the Draft Core Strategy (incorporating Preferred Options) took place during July 2009. This included a number of workshops held for Town and Parish Councils, which aimed to:
- Develop a shared understanding of the way in which Parish and Town Councils can play a role in the development of the LDF:
  - Begin a discussion about where development might go
  - Set out the future steps in the LDF process
- 3.4 The workshops were attended by parish and town councillors, Somerset County Councillors, Planning Policy officers, elected members and local stakeholders, and held on the following dates: Area South 14 July 2009, Areas East and North 15 July 2009 and Area West 29 July 2009.
- 3.5 Notes, including a list of attendees of each of these meetings can be found in Appendix 5. These meetings included discussion on the approach to take for the consultation strategy, the status of settlements and how the emerging plan would impact on existing allocations. Evidence base document such as the Strategic Housing Land Availability Assessment (SHLAA) were also discussed.

### Evidence Base Tour September - October 2009

- 3.6 As part of an overarching consultation strategy for front loading engagement with parish and town councils a 'Data Room' was set up where town and parish councillors could come along and view copies of the Council's Evidence Base documents which supported the draft plan. This also allowed an opportunity to talk to officers about the Draft Core Strategy in order to gain a fuller understanding of the document and it's implications and be better informed to discuss growth options.
- 3.7 On 8 September 2009 parish and town councils and identified stakeholders were notified of the dates and locations of the Evidence Base Tour.
- 3.8 The tour was successfully undertaken between 21 September and 9 October 2009 receiving a positive reaction from those that attended. Appendix 6 includes a summary report setting out the details of the process including invitation letter, where and when events took place, and attendees (with 159 people attending in total).

### Cluster Workshops November 2009 – March 2010

- 3.9 On 15 October 2009 parish and town councils with identified stakeholders including NHS Somerset, Yeovil College, Yarlington Homes, West Dorset District Council, Somerset County Council, Avon and Somerset Police and other local stakeholders (identified by Area Regeneration staff & the town and parish councils themselves) were notified of the dates and locations of the Cluster Meetings. Nine Clusters of town and parish councils were identified around the main settlements in the District and confirmed in discussion with the town and parish councils themselves following the initial workshop launching the Evidence Base Tour during September and October.
- 3.10 The objectives of the workshops were:
- To identify the context for and implications of decisions
  - Assist communities to develop their vision based on the Sustainable Community Strategy and growth needs
  - Promote Local Councilors early involvement in decision making and to assist with subsequent formal consultation

Figure 4: Initial briefing meeting at Haynes Motor Museum 16 November 2009



- 3.11 An initial briefing meeting took place at Haynes Motor Museum, Sparkford on 16 November 2009 with cluster meetings taking place between 24 November and 14 December 2009 (the meeting planned for 23 November was postponed until 9 December so that representatives from Crewkerne Town Council were able to attend). The schedule included a number of dates for follow up meetings should they be required. The Report set out at Appendix 6 includes a full summary of the Cluster Workshops including who attended and the issues raised.

#### Draft Core Strategy (incorporating Preferred Options) October 2010

- 3.12 Consultation on the 'Draft Core Strategy (incorporating Preferred Options)' document took place over an eight week period beginning on 8 October 2010 and ending on 3 December 2010. The consultation process generated 942 respondents with 2,848 individual comments.
- 3.13 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 carried out. This further consultation ran for six weeks and closed on Friday 15 April 2011.
- 3.14 A full programme of consultation took place over the eight-week period and is detailed in the report set out in Appendix 6. In summary the following consultation methods were used at this stage of the process:
- A summary leaflet sent to all households with the South Somerset News (South Somerset District Council's own newsletter)
  - Letters to all bodies on our consultation database as explained in para 2.4.
  - Public notices in local newspapers: Western Gazette, Blackmore Vale Magazine, Chard and Ilminster News
  - Public exhibitions across the District between 12 October 2010 - 20 November 2010 held at: Somerton, Milborne Port, Chard, Martock, Bruton, Ilchester, Castle Cary, Barwick, East Coker, Yeovil; South Petherton, Ilminster, Langport, Wincanton, West Coker and Crewkerne (week day events began at 3.00pm or 4.00pm and ran until 7.00pm or 8.30pm). See Appendix 7 for an example of the display boards.
  - Web site INovem online consultation management system
  - Facebook and Twitter
  - Video by Leader of the Council on YouTube
  - Press releases – articles appeared in a wide range of media organisations such as local newspapers and national newspapers including Western Gazette (11/8/11), Sunday Times (12/8/11), The Guardian (22/8/11) BBC Somerset (23/8/11) Telegraph Magazine (29/9/11)
  - Radio and TV Interviews including interviews with the Leader of the Council on, BBC Radio 4 You and Yours (8/9/11), BBC Somerset (1/12/10).

#### Reaching Minority Groups

- 3.15 In addition to the broad programme of public events some special discussion groups were held with a range of minority groups who we felt were unlikely to attend the exhibition, as set out below.

### Young People

- 3.16 A series of events were held at schools and colleges. The method chosen was to meet with groups of young people and hold a structured discussion around the overall growth proposal, a more in-depth look at key policies and seek some specific feedback on local growth proposals in the catchment area of the school. Four such events were held in schools at Yeovil, Castle Cary/Ansford and Huish Episcopi chosen to enable coverage of urban, market town and more rurally based students:
- Ansford School, Castle Cary, 80 pupils across Years 7, 8 and 9
  - Bucklers Mead School, 30 pupils from Year 8
  - Yeovil College, 15 students studying A-level geography
  - Huish Episcopi Academy, Langport, 30 pupils from Year 11
- 3.17 Each of these sessions has been written up and submitted as separate evidence as part of the consultation process. These are presented (as Appendix 5) in Appendix 6 of this document.

### Black and Minority Ethnic Groups

- 3.18 This was arranged through the Somerset Racial Equality Council and consisted of a discussion group held with 16 representatives from black and ethnic communities across South Somerset. Good representation was achieved from different ethnic groups from across a wide geographical area. This followed a focus group format using a topic guide where participants had been sent a copy of the summary leaflet and paper copies of the exhibition boards (which summarised the contents of the strategy) in advance. There was then a facilitated discussion going through the main aspects of the strategy and pausing to record views on any particular aspect that interested the participants. These again were written up as a separate piece of evidence and have been submitted as part of the consultation. These are presented (as Appendix 6) in Appendix 6 of this document.

### Gypsies and Travellers

- 3.19 A focus group was held with Gypsy and Traveller representatives from across the district. Participants had received a copy of the summary leaflet in advance of the meeting and on the day there was a discussion about the housing needs of gypsy and traveller people where views were sought on the draft policy for Gypsy and Traveller pitch development. The feedback was written up and submitted as a separate piece of evidence as part of the consultation. This is presented (as Appendix 6) in Appendix 6 of this document.

### South Somerset Equalities Steering Group

- 3.20 A discussion group was held with representatives of groups from the Equalities Steering Group, which includes disability groups, groups representing young people, faith groups, black and minority ethnic representation etc. This discussion group was held in the same format as with black and minority ethnic groups, detailed above. The feedback from the groups has been submitted as separate evidence as part of the consultation and this is presented (as Appendix 6) in Appendix 6 of this document.

## Summary of the main issues and how they were addressed

3.21 A broad summary of main issues and how they have been addressed is set out below and Appendix 8 parts 1-5 set out in full the main issues raised and the Council's response.

### Settlement Strategy - District wide housing growth

3.22 The main areas of concern expressed in the consultation were:

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

3.23 The evidence base was updated using the latest available economic and demographic data and the proposed District wide household requirement was reduced from 16,600 to 15,950 dwellings.

### Settlement Strategy - Market Towns

3.24 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. Support was indicated for Crewkerne, Ilminster, Wincanton being classed as Market Towns.

3.25 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.

3.26 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.

3.27 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.

- 3.28 Following consideration of the comments received, Market Town status was divided into Primary and Local Market Towns. Primary Market Towns are Chard, Crewkerne, Ilminster, Wincanton and Local Market Towns are Ansford / Castle Cary, and Somerton. Langport / Huish Episcopi's status was changed from Rural Centre to Local Market Town.

#### Settlement Strategy - Rural Centres

- 3.29 Comments were received in support of Rural Centre status for Bruton and Milborne Port, there were comments in favour and against Ilchester being a Rural Centre. There were no comments submitted on the Rural Centre status of Martock, South Petherton and Stoke sub Hamdon. No change was made to the Rural Centre designation with the exception of Langport / Huish Episcopi as note above.

#### Settlement Strategy - Distribution of growth between Yeovil, Market Towns, Rural Centres and Rural Settlements

- 3.30 Yeovil: A range of comments were received regarding the scale of growth at Yeovil with several comments suggesting that the figure should be increased from the proposed 8,200 dwellings up to 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: an argument that 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.
- 3.31 Chard: There were comments expressing the view 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.
- 3.32 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.
- 3.33 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.
- 3.34 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.

- 3.35 Ansford / Castle Cary: Some consultees felt that the 500 dwellings proposed at Ansford / Castle Cary was about right, but there were several comments objecting, as it was considered too high with concern expressed over school capacity, car parking and traffic. Concerns were also raised 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.
- 3.36 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.
- 3.37 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.
- 3.38 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.
- 3.39 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.
- 3.40 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.
- 3.41 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.
- 3.42 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.

- 3.43 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.

#### Settlement Strategy - Development in Rural Settlements

- 3.44 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.

#### Settlement Strategy - Phasing development

- 3.45 There was some concern as to how development would be phased, how Communities could be assured that brownfield development came before Greenfield and to assimilate sizable growth. Concern was also expressed in relation to employment land development before housing and market housing before or in conjunction with affordable housing. It is felt that the proposed policy addresses the concerns raised by members and by various representees, whilst remaining consistent with national policy.
- 3.46 It is considered that the proposed settlement strategy for the District has addressed the issues raised during the consultation process whilst having due regard to the evidence base including the role and function of individual settlements, national policy and Sustainability Appraisal.

#### Settlement Strategy – Yeovil

- 3.47 The Yeovil Urban Extension Policy received the largest number of individual responses having received 529 comments, with most criticising the Yeovil Sustainability Appraisal and the preferred direction for growth. A further 15 comments specifically challenged the Brownfield / Greenfield split. The Yeovil Urban Village 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 e.g. Hospitals / primary schools / sewage / parking
  - Capacity on existing brownfield sites to accommodate required growth
  - Augusta 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.

- 3.48 In response to the issues raised during the consultation process regarding the preferred direction of growth to the south west, the evidence base was reassessed, including carrying out additional traffic modelling, up dating economic and demographic projections and revisiting the urban development capacity of the Yeovil Urban Area. A proposed East Coker and North Coker Buffer Zone Policy was introduced. An Augusta Westland Flight Safety Zone policy was also introduced to protect the operations of this important local employer.

#### Directions of Growth at the Market Towns

- 3.49 The scale of housing growth at Market Towns was addressed as part of the Settlement strategy.
- 3.50 Chard - Direction of Growth: Key issues to arise out of the consultation process surrounded 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.
- 3.51 Crewkerne – Direction of Growth: Concerns were raised over the housing growth for Crewkerne, in that it relies largely on saved allocations. The objectors felt this is unnecessarily inflexible and would fail to be justified, effective and consistent with national policy tests of soundness. The objectors considered 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.
- 3.52 Ilminster - Direction of Growth: Concern was raised regarding the direction for growth, whilst some supported Preferred Option 2 (Canal Way) others, in particular the Town Council considered Option 1 (Shudrick Lane) to be more appropriate having consulted on that site through their Draft Ilminster Vision.
- 3.53 Wincanton – Direction of Growth: Concerns around the preferred option 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.
- 3.54 Ansford / Castle Cary - Direction of Growth: Representations generally supported the Council's preferred option for growth to the north west of 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.
- 3.55 Langport / Huish Episcopi – Direction of 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 in the draft plan, there were no representations on this issue. 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. Planning Policy Officers had meetings with Langport Town and Huish Episcopi Parish Council to discuss change of approach in August 2011 and May 2012.

- 3.56 Somerton – Direction of Growth: Somerton received the highest volume of comments during the 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.
- 3.57 In response to comments received the plan was amended by re-appraising Option 1 (Shudrick Lane) at Ilminster and presenting that as the Direction of Growth. A much smaller direction of growth at Wincanton to accommodate employment growth only was identified to the south west of the town and a combination of sites are now proposed for the direction for growth at Langport / Huish Episcopi.

#### Housing - Housing Density

- 3.58 Whilst some representations were supportive of the draft Policy on housing 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.
- 3.59 The use of previously developed land for new housing development: Comments raised the following issues:
- The low target of 30% is unjustified and the policy should be reworded to reflect national policy, which stated 60% in (now withdrawn) PPS3: Housing.
  - 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 previously developed land, 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

#### Housing - Affordable Housing

- 3.60 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).

- 3.61 There was both general support and objection expressed for the threshold of 6 of 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.

#### Housing - Gypsies, Travellers and Travelling Showpeople

- 3.62 It was commented that clarification was need regarding the potential impact of sites on nationally or internationally protected sites.

#### Housing - Specialist Housing Provision for Older People

- 3.63 It was suggested that a specific policy was required to address the needs of elderly people in the District.
- 3.64 In response to comments received the plan was amended by deleting the Density policy (following changes in national planning policy guidance). A 35% affordable housing target was retained but the site size threshold increased to 0.2ha in all settlements. The second bullet point of the Gypsies Travellers and Travelling Showpeople policy was amended to provide more clarity regarding protection of national and international designations. A new policy regarding are homes and other specialist accommodation is now proposed.

#### Economic Prosperity - Employment land provision

- 3.65 The majority of objections related to the level of employment land attributed to certain settlements and fell into four broad categories, querying the underlying economic projections, requesting that provision (land or job targets) be made for non-B uses, requesting that a number of jobs be identified for each settlement and querying the distribution (and level) of jobs and housing attributed to each settlement.
- Concern was raised that the policy safeguarding employment land was not strong enough to protect existing employment land, sites and premises.
  - It was commented that the approach to live / work facilities should be reconsidered.
  - Whilst there was support for the policy on major new tourist facilities in general terms there was concern as to whether it was needed.

- A number of comments were received suggesting amendments to the town centre boundaries.
  - Presumption against major new regional shopping facilities - the necessity of this policy was called into question during the consultation process.
- 3.66 In response to the comments received the employment land evidence base was reassessed and provision made for the shortfall identified by the community was included, for example Wincanton's figure rose from 1.5 ha to 5ha of additional employment land. Jobs targets were also added with a separate figure for traditional 'B' class uses identified. The Safeguarding Employment Land policy was strengthened. Further evidence base work was undertaken regarding live / work units which clarified that they are not deliverable. The policy on Major New Tourist Facilities was incorporated into New and Enhanced Tourist Facilities policy. The plan was revised to include an undertaking to review Town Centre Boundaries and it was agreed that the presumption against major new regional shopping facilities would be incorporated as supporting text rather than being a standalone policy.

#### Transport - Rail freight

- 3.67 It was suggested that greater emphasis should be given to the potential for rail freight in the plan.

#### Transport - Travel Plans

- 3.68 It was commented that the policy did not include specific reference to Use Classes B2, C2, D1, D2 and Sui Generis uses.

#### Transport - Car Parking Standards

- 3.69 There was some support for the proposed flexible approach to parking standards. It was commented that 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.
- 3.70 In response to representations received a new policy entitled 'Rail' has been introduced to encourage and promote both passenger rail and rail freight hubs within the District. The Travel Plan policy has been amended to ensure that it applies to all forms of development and Use Classes. The Highway Authority's parking standards have been applied to the District.

#### Health and Well Being - Viability of Open Space Standards in Light of Open Space Strategy

- 3.71 The majority of objections relate to the level of requirements for open space provision. The comments made fell into six 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.

3.72 In response to the issues raised it was agreed that the specific standards would be removed from the Health and Well Being policies and instead they should cross-refer to the Council's Open Space Strategy and Play Space Assessment (which have been published).

#### Environmental Quality - Climate change

3.73 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.

3.74 In response to the issues raised the Climate Change policy was amended to refer to Code for Sustainable Homes Level 5 rather than 6 in line with Government guidance, removal of reference seeking 10% renewable and low carbon energy provision in addition to requirements in the emerging Building Regulations. Reference to the flooding Exception Test and further detail on the application of the Sequential Test and cross refer to the Biodiversity policy were also added.

## 4. Next steps

- 4.1 The issues raised during consultation on the Issues and Options and Preferred Options documents have been key to informing the preparation of the plan. There is now a six week consultation period on the Proposed Submission Local Plan, running from Thursday 28 June to Friday 10 August 2012. The Proposed Submission Local Plan will be available to view at the District Council's main offices, libraries, and on line at:  
[www.southsomerset.gov.uk/localplan](http://www.southsomerset.gov.uk/localplan)