

# LOCAL PLAN ISSUES AND OPTIONS

Consultation Report – Part 2

October 2020

---

## Contents

1.	<a href="#">Introduction</a>	2
2.	<a href="#">Data analysis</a>	4
3.	<a href="#">Executive summaries</a> present some key points made on the Issues and Options Document and provides initial Council comments.	
	<i>Issues and Options Section 4 <a href="#">Objectives</a></i>	5
	<i>Issues and Options Section 5.1 <a href="#">Carbon neutrality</a></i>	6
	<i>Issues and Options Section 5.2 <a href="#">Sustainable locations</a></i>	7
	<i>Issues and Options Section 5.3 <a href="#">New and affordable homes</a></i>	8
	<i>Issues and Options Section 5.4 <a href="#">A prosperous economy</a></i>	9
	<i>Issues and Options Section 5.5 <a href="#">Infrastructure</a></i>	10
	<i>Issues and Options Section 5.6 <a href="#">Connecting people</a></i>	11
	<i>Issues and Options Section 5.7 <a href="#">The natural and historic environment</a></i>	12
	<i>Issues and Options Section 5.8 <a href="#">Thriving coastal and rural communities</a></i>	13
	<i>Issues and Options Section 5.9 <a href="#">Wellbeing of our residents</a></i>	14
	<i>Issues and Options Section 5.10 <a href="#">Policies for our places: Taunton</a></i>	15
	<i>Issues and Options Section 5.11 <a href="#">Policies for our places: Wellington</a></i>	16
	<i>Issues and Options Section 5.12 <a href="#">Policies for our places: The Coastal Strip</a></i>	17

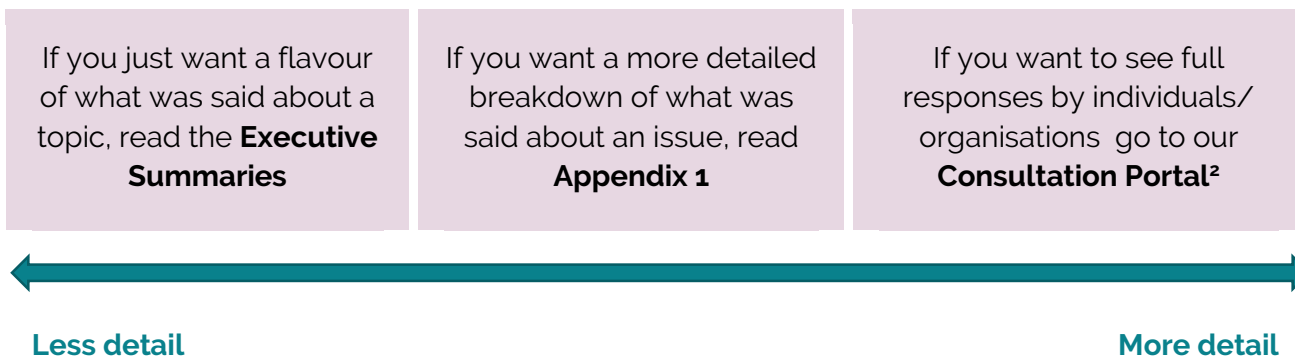
**Appendix 1** – Summary tables of comments made via email/letter on the Issues and Options, Sustainability Appraisal and Habitat Regulations Assessment

**Appendix 2** – Site suggestions and maps

# 1. Introduction

This report summarises the detailed responses that Somerset West and Taunton (SWT) received through the Local Plan Issues and Options<sup>1</sup> consultation that took place from 13<sup>th</sup> January to 16<sup>th</sup> March 2020. It also includes responses to the Sustainability Appraisal and Habitat Regulations Assessment consultations. By detailed responses, we mean:

- Responses received via email/letter; and
- Responses received via the Consultation Portal to the open-ended consultation questions.



The Issues and Options Consultation Report: Stage 1<sup>3</sup> was published in July 2020 and sets out how SWT has sought participation from communities and stakeholders and gives results from the questionnaires and social media posts. This Stage 2 should be taken in conjunction with Stage 1.

## Covid-19

The consultation took place before measures were put in place to respond to the Covid-19 coronavirus outbreak, where a period of "lockdown" began on 23 March 2020. It is possible that respondents might hold different views or give different responses in the light of the outbreak.

The pandemic has impacted the way in which the Council has provided services over recent months hence why the publication of the Consultation Report Stage 2 has taken longer than expected.

## Government consultations on planning reform and changes to the planning system

The Government has consulted upon a reform of the planning system in England<sup>4</sup>. If these reforms take place, it is likely to reduce the content and scope of a Local Plan. A key proposal is that the National Planning Policy Framework would become the primary source of policies for development management (guiding decisions on planning applications) and that there would be no provision for the inclusion of generic development management policies within Local Plans.

<sup>1</sup> <https://www.somersetwestandtaunton.gov.uk/localplan/>

<sup>2</sup> <https://yoursay.somersetwestandtaunton.gov.uk/local-plan/issues-and-options/>

<sup>3</sup> <https://yoursay.somersetwestandtaunton.gov.uk/local-plan/issues-and-options/>

<sup>4</sup> <https://www.gov.uk/government/consultations/planning-for-the-future>

Local Plans would focus on the location of development and specific development standards supported by design guides and design codes.

The Government has also consulted on significant changes to the current planning system which would affect the way affordable housing is delivered, how infrastructure is funded and changes the Standard Method calculating the housing figures for a local area<sup>5</sup>.

Where the Council has offered a response under each theme in the Executive Summaries, this may be further affected by the outcomes of any reforms to the planning system.

### **Unitary Council proposals**

The Leader of Somerset County Council has stated that he wishes to pursue the option of a single unitary Council for Somerset. The position has now advanced to one where Somerset County Council has approved a Business Case for the creation of a single Unitary Council for Somerset and this has been submitted to the Secretary of State.

The Government has indicated it would wish to see unitary solutions to all parts of England currently covered by "two tiers" of County and Districts. Therefore, the District Councils have been working on the development of a Business Case for the reform of local government including the creation of two new unitary Councils for Somerset. This will be presented to the Government as an alternative to the County Council's single unitary proposal.

The timetable indicates that if either re-organisation plan meets Ministerial approval, then transitional arrangements would commence in April 2021. Therefore, if it goes ahead, LGR in Somerset will have a significant impact on the way all public services (including planning and the Local Plan) are delivered for years to come. The Local Plan (or its equivalent if changed by central government), will need to be embedded into any new structures and cover the geographical area of the new local authority. The background work and consultation so far on the Local Plan 2040 will still be of relevance to any new Local Plan for a unitary authority.

---

<sup>5</sup> <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>



### 3. Executive summaries

#### Objectives (Issues and Options Section 4)

##### Key points from the consultation

**General comments** Reference climate change and flood risk; Aspirational but need to be SMART; Acceptable although fairly generic; Intent should be stronger; Unclear if they have equal weight; Must reflect the achievement of sustainable development; Objectives are interdependent/conflicting.

**Objective 1 (Carbon neutrality)** Both support for and objections to the aim to work towards carbon neutrality by 2030; concern that it is not achievable; respect national standards; standards/measures need to be pragmatic and flexible with clear guidance.

**Objective 2 (Town centres)** Comments that Wellington should be mentioned to reflect its growing importance in the settlement hierarchy and for employment growth; broaden the objective to reference enhancing the role of the whole of Taunton such as employment at industrial estates; suggest referring to enhancing the role of villages too.

**Objective 3 (Homes)** Broad support for the inclusion of this objective with some detailed comments including the need for evidence for specialist housing and that homes should be affordable high quality zero-carbon; more social housing and homes for first time buyers.

**Objective 4 (Economy)** Supportive comments; more focus on employment; make West Somerset a centre for emerging cluster opportunities.

**Objective 5 (Infrastructure)** Support for this objective; further comments that the delivery and funding of required infrastructure needs to be clear and achievable; need to fix existing infrastructure first; include reference to blue and green infrastructure.

**Objective 6 (Sustainable travel)** General support for this objective; some comments note need to recognise the challenges in a predominantly rural district where communities are totally dependent on car travel; should be an objective to mention connecting Taunton and the Country Park with Hestercombe and the Quantocks with footpaths and cycleways; a comment that planning's role is about 'enabling' not 'changing' behaviour.

**Objective 7 (Environment)** Suggestion that 'historic environment' referenced with 'landscapes, biodiversity and local character' and rewording to focus on the conservation and enhancement of the historic environment; comment noting that policies that support draft Objective 7 are consistent with national policy by not discouraging innovation or change, nor applying a blanket approach to the protection or enhancement of the environmental or historic environment.

**Objective 8 (Rural and coastal communities)** Support for the objective; suggestion to reference safeguarding and supporting local employment and community services/facilities.

**Objective 9 (Wellbeing)** Support for this objective; more required on leisure, sports and recreation; include reference to safety and to listening to the needs/knowledge of the local communities.

## Carbon neutrality (Issues and Options Section 5.1)

### Key points from the consultation

**General focus on carbon neutrality** General support for focus on carbon neutrality and that rapid decarbonisation is necessary over the decade to 2030. Some concern the target might be unrealistic. Some felt it might be difficult for individual developments to demonstrate their impact on achieving the overall target, and the Plan must be clear what is required of developments. Some confusion between the overall carbon neutrality target and proposal to set requirements to achieve zero carbon from new development.

**Achieving carbon reduction from new development** Many individual and organisational respondents supported requiring zero carbon developments from as soon as possible, some citing the Government's previous national policy proposals, and the fact that technology already exists. Some considered earlier than 2025 to be more appropriate. Developers tended to suggest 2025 was too soon, preferring alignment with the Future Homes Standard. A number suggested that even 2030 was unrealistic, and that setting the date too early would result in unviable and stalled development to the detriment of other elements of sustainable development. Other points raised included mandating use of solar panels; ensuring a focus on embodied carbon and circular economy principles; ensuring sufficient flexibility in requirements; and ensuring sustainable waste reduction and management by future occupiers is integral to good design of new development.

**Low carbon and renewable energy** General support for a hybrid policy approach which would allocate relevant and appropriate sites and stipulate criteria for developments to come forward within identified areas. The importance of landscape and heritage designations, impacts upon wildlife, and amenity were raised as relevant criteria. There was support for community scale renewable energy projects to minimise such impacts.

**Electric Vehicle (EV) charging** Strong support for EV charge points in new development and ensuring every new dwelling is supplied. Many developers identified a need for flexibility for communal parking spaces which are less straightforward to supply.

**Thinking holistically** Some suggested the Plan should support multi-functional land uses, integrating carbon storage, nature recovery and energy generation.

### Initial remarks from Somerset West and Taunton Council

The Council is pleased that there is general support for our carbon neutrality ambitions. We have published the Carbon Neutrality and Climate Resilience Action Plan and the Somerset Climate Emergency Strategy. Both documents identify and evidence ways in which planning can influence our push towards carbon neutrality. The Local Plan will build on these elements to ensure a strong focus around climate and carbon neutrality.

The Council expects to work closely with the other Somerset authorities, as well as development of key evidence including renewable energy and heat network opportunities. A Somerset EV Charging Strategy is also being finalised, which will influence policy on EV charge points. The Council will keep a close eye on the final proposals around the Future Homes Standard and progress of other Local Plans with regards to requiring zero carbon developments. Any policy approach will need to be evidenced as viable and deliverable.

## Sustainable locations (Issues and Options Section 5.2)

### Key points from the consultation

**Settlement tiers** In general there is support for the tiers with Taunton at the top due to its size, employment opportunities, transport and facilities; Many comments that Minehead has a more significant role in the local area and it should be in Tier 2, but recognition that it is constrained. Some specific comments about the position of individual settlements and that tiers are inconsistent and could be better defined, particularly in relation to tiers 5 and 6; Concern that there are too many tiers and that it needs simplifying; Recognition that further work is required to define the tiers including the sustainability of settlements in close proximity to Taunton.

**Watchet and Williton as associated settlements** There were opposing views on whether Watchet and Williton should be treated as associated settlements. Reasons against were that they operate as two separate communities; have distinct identities and characteristics; that there is little functional relationship between them; each is largely self-contained; limited public transport between them. Reasons for an association were that they complement each other in terms of services; they are in close proximity to one another; provide a more significant role locally compared to the other Tier 4 settlements as they are further from the services and facilities in Taunton compared to Bishops Lydeard and Wiveliscombe.

**Distribution of new development** We received lots of comments about this issue. Most respondents were in support of focussing new housing in the most sustainable locations specifically at Taunton, and secondly at Wellington. Some supported further increases in the proportion of growth at these places and some in the villages near Taunton such as Ruishton, Henlade and Creech St Michael. There was support for growth close to the M5 but concerns that this might mean developing to the east of the M5. Some comments noted that housing was more deliverable in areas closer to the M5 compared to the former West Somerset area.

There were mixed views on growth in the former West Somerset area. Whilst several respondents supported additional development in Watchet and Williton, there was disagreement that Watchet and Williton should take more growth due to the poor road network and pressure on local services. Many respondents do not consider that Minehead has the capacity for more housing due to it being sandwiched between the coast and Exmoor National Park but there was support for investment and employment opportunities. Hinkley Point C wasn't generally seen as a reason for more housing in the Watchet and Williton area.

Several respondents wanted to see an appropriate scale of growth allowed in smaller settlements and villages to support their vitality and to provide flexibility in housing supply. Other points made included the need to consider environmental issues in the location of new development (landscape, sea and river flooding, biodiversity), support for focussing on brownfield in sustainable locations.

### Initial remarks from Somerset West and Taunton Council

There were some useful and interesting comments received about this issue and a variety of opinions. We are planning to do further work to better understand the role and function of our settlements to refine the settlement hierarchy in the Local Plan as noted in Topic Paper 1.

## New and affordable homes (Issues and Options Section 5.3)

### Key points from the consultation

**New homes target** Generally developers consider that the Council should seek a higher target referring to the need to consider uplift in line with the NPPF; Other respondents had very mixed views ranging from higher, the same, lower or a flexible number; Target needs to be informed by up-to-date housing need evidence; Alternative Standard Method calculations submitted; Generally parish councils did not wish to see the Standard Method exceeded.

**Affordable Housing** A variety of points including: Definition should reflect the new tenures in the NPPF; 35% has been secured in West Somerset so it should be deliverable elsewhere; Better to require contributions to deliver affordable housing than developers who will resist; Council should ensure consistency across district and Neighbourhood Plans; Should have a target not a requirement as different products are likely to be more suitable and commercially viable in different areas; Produce a viability assessment; Need for affordable housing in Minehead and Alcombe area and some parishes; Housing to help young people.

**Pitches for Gypsies, Travellers and Travelling Showpeople** Most people seemed in support of the Local Plan assisting travelling communities in finding suitable sites; Many respondents were keen for the Council to engage with the communities and find out what they needed; Allocation of specific suitable sites is clearly favoured (e.g. close to main roads, sensitively located; small scale); Rural exception sites also generally supported though recognition that they may not have the infrastructure services required; Strong objections to requiring part of a larger development site to be for pitches as it would affect viability and lead to over provision (issues experienced in Mid Devon Council referenced),

**Accessible and lifetime homes** General support for a percentage requirement; Noted that Government's standards are optional and a percentage requirement should be informed by relevant up-to-date evidence and considered in development viability; Requirement should be driven by demand and focus on adaptability; Clarity sought on specific requirements due to cost and space implications; Concern over having a blanket approach as some sites unsuitable and should identify specific sites instead; Should just rely on Building Regulations Part M Category 1 (M4(1)) as these homes will be sufficient for most people; Concern that people who need these dwellings may not be able to access them.

**Custom Self Build plots** Some mixed views on the best approach but strongest support for the allocation of specific sites and also for rural exception sites as affordable self-build (but if rural exception sites are appropriate then the priority should be for general affordable housing not self-build; Concerns that a requirement on a larger housing development site won't meet the identified need or be practical in terms of delivery and completion of the whole site.

### Initial remarks from Somerset West and Taunton Council

The Council is producing a Local Housing Needs Assessment and, as stated in the Issues and Options document, we will be considering evidence for an uplift to the Standard Method figure. The LHNA will also consider evidence for specialist housing requirements. We are producing a Viability Study to inform our policies on affordable housing requirements. We are also working on an update to the Gypsy and Traveller Needs Assessment. These elements of the Local Plan could potentially be significantly affected by the planning reforms as referred to in the introduction.



## A prosperous economy (Issues and Options Section 5.4)

### Key points from the consultation

**Economic growth target** There is general support for higher value jobs but also for a range of jobs including overall job numbers; Strong support for providing jobs suitable for young people; Developers keen for a flexible strategy with criteria based policies; Support for large and smaller start up business; Suggestion that we need to be clear on our local strengths and not compete with neighbours; Communities need a range of uses such as employment, facilities and services as well as housing; Encourage jobs former West Somerset; Link the provision of housing growth in the rural areas with job creation; Employment aspirations are unrealistic with Taunton allocations not taken up.

**Making the best use of employment sites** There is strongest support for a flexible policy that allows loss of employment sites subject to criteria; Some support for retaining all employment sites; Current employment sites should be reviewed; Redundant farm buildings could be used as residential or employment uses; Retain the strongest sites considering quality not quantity; Consider the historic environment in terms of opportunities; Provide sites for new and expanding businesses enabling businesses to stay.

**Town centre vitality** Acknowledgement that the role and function of town centres is changing and likely to result in their reduction in size; Need to support diversification in town centres but define and retain their retail core; There are place-shaping benefits from small-scale retail and leisure; Encourage better use of premises, Flats and offices above shops, Mixed use shop and online activity form same premises; Lower business rates and lower car parking charges; Need to solve problem of out-of-town retail killing the high street.

**Communal work hubs and home offices** General support for communal work hubs; home offices dependant on good broadband; Developers would need sufficient lead-time to incorporate home offices into house types; Encourage the development of co-operatives and other community and social enterprises to develop and/or manage communal hubs; Any requirement should be based on evidenced need for that specific location with an exit strategy if unviable.

### Initial remarks from Somerset West and Taunton Council

To inform Local Plan policies and site allocations, we are producing a Local Economic Development Needs Assessment to consider future employment growth and the need for employment land. The forecasts will be considering the impacts of Covid-19 on the economy.

The Council published its Economic Development Strategy 2020-2024 in February 2020. It identified issues for our area including social mobility and new business opportunities in emerging sectors, and new ways of doing business such as increasing digitalisation and the need to respond to the climate emergency. The Nexus 25 Local Development Order granted planning permission for a strategic employment site of approximately 25 hectares to serve the future growth needs of Taunton.

As a result of Covid-19, our Economic Recovery and Growth Plan is looking to restart, revitalise and regrow our economy with strategic priorities relating to climate emergency and reshaping our high streets. It will have a series of actions to deliver alongside and in conjunction with the Local Plan.

## Infrastructure (Issues and Options Section 5.5)

### Key points from the consultation

**Priorities for developer contributions** Recognition of the need and difficulty in balancing the different requirements; Considerable support for prioritising infrastructure over other needs; Some strong support for prioritising climate change design measures; Limited support for affordable housing over other needs; Many comments that an assessment of viability needs to be undertaken before deciding on priorities; Suggestion that a blanket approach to infrastructure prioritisation may not be appropriate as certain locations/types of development will have different pressures and needs; Need for more substantial strategic and policy statements to address flood and water management for the Climate Emergency

**Viability** Impacts on viability noted include parking spaces, biodiversity mitigation/enhancements/offsetting, local and national standards, CIL and S106; the total cumulative cost of all relevant policies must not undermine deliverability of the plan; require robust viability assessment in accordance with the NPPF that assesses a comprehensive range of development and site types; advise against setting affordable housing at its maximum limit

**Community Infrastructure Levy (CIL) and Issues and Options Section 106** The Council should deliver affordable housing not developers; Clear funding plan for infrastructure; Flexible approach to infrastructure requirements on a site by site basis; Grouping strategic infrastructure under CIL doesn't provide certainty of funding for school places; Provide CIL relief for custom-build community-led housing; Important to provide clarity between CIL and S106 requirements.

**Sustainable Urban Drainage Systems (SuDs)** SuDs should to address existing and future drainage and development pressures in the area; Local Plan should recognise cost implications of providing SuDs; More emphasis on SuDS features; Should primarily be above ground and aimed at providing habitat for wildlife; Grey water management should be a feature of Climate Emergency design.

**Suggestions of infrastructure to direct developer contributions towards** Green Infrastructure and public transport across the Exmoor National Park; Transport/highways infrastructure require to support strategic development; Support for the conservation strategy and enjoyment of the historic environment; Rail improvements; Village school capacity; Education and health services; Climate change requirements; Infrastructure packages for strategic development; Management of open spaces.

### Initial remarks from Somerset West and Taunton Council

We are producing a Whole Plan Viability Study to inform our policies on affordable housing requirements. However, the way in which infrastructure is provided could change as a result of the Government's planning reforms referred to in the introduction. The reforms propose removing CIL and S106 and replacing them with an Infrastructure Levy which would also deliver affordable housing. The Levy would be a nationally set value-based flat rate charge which would remove the need to consider site viability. Local authorities would continue to identify how it is spent. Local communities may also be given more control over how the Levy is spent.

## Connecting people (Issues and Options Section 5.6)

### Key points from the consultation

**Encouraging sustainable modes of travel** All respondents generally support the ambition of reducing car use though some comment that this is more achievable in urban areas compared to rural areas. The location of development came through as a key factor with respondents seeking development in sustainable locations, where there would be a critical mass of homes to support infrastructure and public transport, where the self-containment of settlement can be improved and by co-location housing and employment. Transport interchanges and hubs were suggested in key locations such as Blackbrook Business Park and Park and Rides. An integrated approach to car parking is suggested to reduce car use such as reducing the availability of private and public car parking, increasing parking charges, car free developments and car clubs.

**Public transport** Many comments related to improving public transport in terms of a better bus network, longer operating hours, improving the user experience (e.g. quality of the environment of stops, real time information). Alternatives to conventional bus services were considered necessary such as community transport schemes. There was some support for improving the rail network noting the re-opening of a station at Wellington and opening the West Somerset branch line suitable for national rail services. A few comments supported the use of Section 106 to support bus services, but it was noted that the relevant tests set out in the NPPF paragraph 56 would need to be satisfied.

**Active travel** Support for more and better cycle routes needing to be of high-quality design, safe and with sufficient cycle parking at home, destinations and hubs. Support for a strategic Green Infrastructure framework for walking and cycling routes connecting green wedges and AONBs and the National Park. There was some support for the incorporation of active travel guidelines, but it was noted by some that these are guidelines and not requirements.

**Digital connectivity** Comments included: that the Council should not impose connectivity requirements beyond the provision of infrastructure as set out in Building Regulations Part R on to developers; a need to recognise and provide for the conservation and enhancement of the significance of heritage assets, including their settings, in selecting sites and in the placement and design of new equipment; support for improved broadband speed at home especially with the increase in home working, which also reduces the need to travel.

### Initial remarks from Somerset West and Taunton Council

The Council's Climate Emergency declaration has embedded the importance of reducing the need to travel and to use more sustainable and active modes of travel. This is a huge challenge in our predominantly rural area where the public transport network is very limited.

Covid-19 has encouraged us to be more active so we should create opportunities to further encourage walking and cycling. The significant increase in people working from home makes high quality digital connections in new homes critical. The Government intends to deliver nationwide gigabit-capable broadband as soon as possible, and aims for the majority of the population to have 5G coverage by 2027<sup>6</sup>.

---

<sup>6</sup> <https://www.gov.uk/guidance/digital-connectivity-portal>

# The natural and historic environment (Issues and Options Section 5.7)

## Key points from the consultation

**Biodiversity** Suggestions to improve biodiversity include: avoidance measures and mitigation for species; buffer zones along river corridors; provide and improve wildlife corridors including hedgerows, wildflower meadows, grassland; pockets of green space; new development to provide habitats for pollinators; hedges instead of fences; use of the Somerset Habitat Evaluation Procedure; improve green links and public access to the countryside; nature based buggy and wheelchair friendly walking routes; incorporate diverse crops and breeds.

Comments from developers centred on the need for biodiversity net gain to be considered in assessing viability and to refer to biodiversity offsetting and credit. Generally, developers do not want the Local Plan to require the use of the Somerset Habitat Evaluation Procedure but to instead use the standardised DEFRA metric or at least allow flexibility in the method used.

**Flooding and coastal management** Reduce surface run off and enhance role of SUDS through high quality design; Water management requirements on small sites; Encourage natural flood management; Brownfield regeneration sites; Re-examine existing site allocations and protect areas designated for future attenuation and areas of coastal erosion; Integrate catchment management for development sites; Don't build on flood plains.

**Landscape** Plan for future enhancement of the canal and rivers; Differing views to preserve the green wedges and review the green wedges; Give proper consideration to development sites in the AONBs especially views; The setting of settlements falling outside a designated landscape area remain important.

**Heritage** Comments related to a lack of up-to-date evidence base and a positive strategy for the historic environment to inform the new Local Plan; ensuring that the Local Plan reflects national policy; and detailed wording suggestions; reference our history in public spaces; conserve and enhance local character and distinctiveness through good design and the use of natural and traditional materials

**Trees** Support for tree planting and particularly that this should be focussed on woodland habitat creation such as to support bat foraging; Support for more trees because of the role they play in creating shade, rainfall interception, wildlife corridors, reducing flooding and the urban heat island effect; Support for community woodlands and orchards and for protecting existing tree roots; include agroforestry.

## Initial remarks from Somerset West and Taunton Council

The Council intends to produce a Coastal Management Plan and will consider updates to historic environment, green infrastructure and landscape evidence base. On 1 Oct 2020 the Council declared an Ecological Emergency. Actions relevant to the Local Plan include: promoting woodland planting, rewilding, natural flood management, wild flower meadows, habitat creation and restoration; reduce energy and material consumption, reuse and recycling, energy efficiency and renewable energy generation; and increase wildlife habitats, green infrastructure and natural capital in Somerset West and Taunton; Provide advice on how to incorporate biodiversity, green infrastructure and natural capital into Neighbourhood Plans.

## Thriving coastal and rural communities (Issues and Options Section 5.8)

### Key points from the consultation

**Settlement boundaries** Mixed views as to whether there should be settlement boundaries or not. A number comments not supportive of development east of the M5. Reasons for boundaries include: Providing more certainty; Defence against rampant development; Limits creeping of development; Criteria based planning is open to abuse; Can resist over-development; Avoids piecemeal development without infrastructure provision

Reasons against settlement boundaries but having a criteria-based policy: Boundaries are often arbitrary; They create high value area and worsen unaffordability; Can be a barrier to sustainable development; Sites should be considered on their own merits; Boundaries would limit the ability of sustainable development opportunities; Loosen boundaries to direct growth to more sustainable locations; One size doesn't fit all.

**Development in the countryside** Differing views on the policy 8b/1. Concern that any criteria-based system for countryside areas wouldn't be sufficiently rigorous. On the contrary, support for a criteria-based policy for when development in the countryside would be acceptable beyond settlement limits.

**Rural issues** More social housing; Protect rural services and good agricultural land; Promote rural working hubs, communal workspaces, opportunities for social interaction; Rural development projects should make use of local labour, materials, and services; Rural developments must be considered against pollution to rivers and groundwater, and for light pollution; drainage infrastructure issues; Restrict second homes; Reference agricultural transformation; Heritage assets contribute to the significance of settlements;

**Tourism development** Should better recognise the importance of tourism to rural communities in providing jobs and supporting the local economy; Provide opportunities for the relocation of tourism accommodation to areas that are less vulnerable to coastal erosion

**Coastal issues** Avoid development in coastal areas due to future sea level rises; Welcome recognition of coast erosion; New development should not compromise adaptation measures; Require careful consideration in relation to coastal management practices; Consideration needs to be given to links between the Local Plan and the marine planning system;

**Hinkley Point** Support for proposals to mitigate short and long term adverse cultural, economic, environmental and social impact and provides a net gain of biodiversity in the area; Suggestion to add reference to impacts on the historic environment. Proposal for Hinkley Point A to be used for new employment uses following decommissioning and remediation.

### Initial remarks from Somerset West and Taunton Council

In September 2020, the Council adopted a Local Development Order to support the delivery of small scale industrial and employment space in rural areas without needing to make a full planning application. This has become increasingly significant as the Council works to promote economic recovery from Covid-19. The Council's Economic Development Strategy 2020-2024 seeks to strengthen the tourism offer of our coastal towns, while reducing dependency on this sector alone and diversifying the offer. The Local Plan will build on these initiatives.

## Wellbeing of our residents (Issues and Options Section 5.9)

### Key points from the consultation

**General support** Policy intentions to improve health, wellbeing, inclusivity and equality outcomes were supported. Some suggested that the Plan should be clearer about the links between a healthy population and a healthy and prosperous economy.

**Health Impact Assessments (HIAs)** Developers tended to recognise the importance of ensuring positive health and wellbeing outcomes, but suggested that HIAs should only be required proportionally (e.g. Screening reports for the largest developments) and full HIAs required only where significant adverse impacts are identified, in line with the NPPF and PPG.

**General design** Most embraced and supported proposals to require high quality design, though some doubted the ability to secure higher levels of design from developers. Some identified the importance for design requirements to adequately reflect the need for buildings to be resilient to climate change and foster sustainable behaviours. Developers were clear that design standards must be set by Local Plan policies and not left to SPDs which hold no statutory force. The importance of Taunton's skyline was acknowledged, but some suggested a positive policy should encourage innovative, high quality and not simply restrict taller buildings. A number questioned why skylines in other locations were not considered. Support for design to help older people access services, shops and community facilities.

**Flexible highways design** A number of respondents identified that this would require a flexible approach to be taken by SCC Highways. SCC Highways suggested that any flexibility in design would still need to meet statutory requirements, especially if they were intended for adoption by the Highways Authority. Other suggestions included requiring street trees in all residential developments and ensuring policy also applies to retrospective improvements.

**Open space and active design** The importance of protecting existing, improving access to, and providing new, fit for purpose, local green and open spaces and sports facilities was recognised. It was also recognised the ability for people, and particularly young people, to live healthy and active lives is constrained by the built environment. It was suggested policy should refer to Sport England and Public Health England revised Active Design guidance. The importance for health and wellbeing of ensuring access to nature was also identified.

### Initial remarks from Somerset West and Taunton Council

The policy proposals for Health Impact Assessments stated the intention to identify a suitable threshold for their requirement. In line with the NPPF and PPG, any policy will be proportionate and justified. The Council is in the process of producing a district-wide Design Guide and design guidance for specific allocated development sites. The requirements of these will align to existing planning policy, but will identify aspirational elements that may subsequently be covered by future policy. The Council will not be able to insist upon the aspirational requirements until/unless aligned to adopted Local Plan policy. The Design Guide SPD may be reviewed alongside new Plan policy in time. Facilitating active modes of travel through active design and flexible highways design are closely aligned to action to address the Climate Emergency and will be a key focus of the Plan. We are considering the need for further evidence in relation to need for outdoor and built sports facilities, allotment provision, woodland planting and play provision.

## Policies for our places: Taunton (Issues and Options Section

### 5.10)

#### Key points from the consultation

**Distribution of new development.** A number of developers were promoting sites for development on sites adjoining or close to Taunton. Some seek to extend existing Local Plan garden communities whilst some suggest site to the east of the M5 motorway.

**Introducing more housing to Taunton town centre** Respondents in favour of introducing more housing to the town centre and support the use of brownfield sites. Many agreed that car-free developments are an option but that it would require an improvement to the bus network and Controlled Parking Zones. Respondents generally not keen on higher buildings.

**Landscape.** Support for preserving the green wedges as well as some requiring evidence to justify their boundaries. A need to improve green links and manage urban green spaces in a more natural way. The importance of Taunton's skyline was acknowledged, some suggested a policy to deliver innovative and high quality development and not simply restrict taller buildings. Taunton has a wealth of heritage assets that are sensitive to change.

**Town Centre.** Support for the redevelopment of brownfield regeneration sites and bringing vacant or underused buildings back into use. Some suggested car free developments in the town centre including via locally led co-operatives and other community enterprises. Any redefined retail core should be clearly drawn and strictly control non-retail uses within it to retain/maintain the critical mass and footfall required to sustain vitality and viability.

**Encouraging sustainable modes of travel.** Support for increased walking, cycling, an integrated transport system and sustainable transport corridors. To encourage use of the Park and Rides, some suggested a reduction in town centre car parking. Some mentioned the need for further measures to address air quality in the East Reach Area Quality Management Area.

**Biodiversity.** The significance of the River Tone provides as an important wildlife corridor was mentioned by some, as was the need for the creation of new woodland as a foraging area for foraging by lesser horseshoe bats from the Hestercombe House SAC.

**Flooding and planned defences.** As only some of the measures in the previous Surface Water Management Plan (SWMP) for Taunton were implemented, there was a need to review and draw up a new SWMP that takes account of an integrated approach to water management in the town, Some encouraged the use of SuDs to address existing and future drainage and development pressures in the area.

#### Initial remarks from Somerset West and Taunton Council

The Council welcomes the support for the broad thrust of the policy objectives. We welcome the support for the redevelopment of brownfield sites and bringing vacant or underused buildings back into use in revitalising and re-shaping the town centre. It reinforces the Council's Future High Street bid which acknowledges that the retail sector and the role of town centres is changing; and that there is a need to diversify uses in the town centre, including more residential development. We welcome the support for sustainable modes of travel and reduced car use. These considerations will be taken into account in the next stage of Local Plan preparation. See Appendix 2 for details of sites suggested for development.

## Policies for our places: Wellington (Issues and Options Section 5.11)

### Key points from the consultation

**Policy Approaches.** There was broad support for a lot of the policy approaches set out for Wellington as well as a comment about them needing to be more ambitious.

**Distribution of new development.** A number of developers were promoting sites for housing and mixed use on sites adjoining the existing Wellington settlement limits. Some seek to extend / amend existing Local Plan allocations. The alternative view was also given that after all the allocated sites had been developed, Let Wellington have a good period of respite. Some support and objection regarding a northern relief road.

**Current Local Plan Allocations.** Longforth Farm employment site: due to presence of populations of sensitive species including rare bats, dormice and great crested newts concerns were expressed about this this allocation. Alternative uses have been suggested for the Longforth employment allocation, which in the Core Strategy is currently allocated to enable the employers Reylon and Swallowfield to relocate.

**Town Centre.** That retail development should be inside the town centre. Out of town retail should be restricted. Concern that town centre is not as healthy as suggested with too much focus on Taunton improvements. Utilise empty premises above shops.

**Community Infrastructure.** It was stated that there has been a lack of planning gain for Wellington from all the house building. Significant support for more sports facilities in the town particularly a single sporting/football hub.

**Natural and historic environment** Some welcomed the acknowledgement of Wellington's rich historic environment, the risks and proposal to support and enhance heritage asset across the town. The presence of sensitive wildlife around the urban fringe has been missed as a key issue for the town. Some encouraged the use of SuDs to address existing and future drainage and development pressures in the area.

**Encouraging sustainable modes of travel.** Support for re-opening of a rail station. Support expressed for various walking and cycling routes / improvements around Wellington and to Taunton along the canal. Desire to make using the bus easier and more attractive to use.

### Initial remarks from Somerset West and Taunton Council

The Council welcomes the support for the broad thrust of the policy objectives. We acknowledge the need to bringing vacant or underused buildings back into use in revitalising the town centre. We welcome the support for re-opening the railway station, sustainable modes of travel and reduced car use. The need for additional playing pitches is noted. These considerations will be taken into account in the next stage of Local Plan preparation.

See Appendix 2 for details of sites suggested for development.



## Policies for our places: The Coastal Strip (Issues and Options Section 5.12)

### Key points from the consultation

**Policy Approaches.** There was broad support for the suggested policy approaches. A number of respondents suggested the need for site specific policies.

**Distribution of new development.** A number of developers were promoting sites for housing and mixed use. Sites for employment use were also suggested at Hinkley Point A and B as these sites cease power generation and enter the decommissioning phase during the plan period (see Issues and Options Section 4 of this consultation report for further details). Some suggested that significant further development should be steered to Minehead. Others expressed support for the redevelopment of the former Paper Mill site at Watchet. Others made reference to constraints, infrastructure and employment issues on the existing Local Plan allocations in Minehead and Watchet.

**Tourism.** A number of respondents highlighted the role that Minehead, Watchet and the coastal strip performs as a tourism destination. Reference to the importance of Butlins as well as the need for policies to encourage revitalisation of Minehead and Watchet harbours.

**Natural and historic environment** Need to acknowledge that the coastline contains a high number of heritage assets (centred around Minehead and Watchet). Proposals to support, conserve and enhance heritage assets to be informed by an appropriate evidence base. That gateway towns / settlements have the potential to encourage increased recreational pressure and adverse air quality effects on habitats within the Exmoor and Quantocks SACs. A number of the parish councils would welcome the opportunity to discuss coastal erosion.

**Homes and infrastructure.** Before any more houses are built, transport services and transport links need to be improved. Concern regarding doctors' surgeries and school capacities. Suggested that land should be allocated to expand the cemetery at Minehead. The issue of second homes ownership in the area had not been addressed.

**Encouraging sustainable modes of travel.** Support for walking and cycling improvements between coastal communities and EV charging at car parks for residents and visitors. Support given to the greater use of West Somerset Railway and bus services as part of tourist events / link to key tourist destinations.

**Flood Management.** Issues of flooding, surface water management issues and the failure to make space for water. Sea level rise and the threat of flooding was raised. Some encouraged the use of SuDs and new attenuation areas in future in development design.

### Initial remarks from Somerset West and Taunton Council

The Council welcomes the support for the broad thrust of the policy objectives. For this geographical area, we welcome support expressed for a Local Plan Review that retains and recognises the importance of tourism. We welcome the statements regarding the greater use of West Somerset Railway and more sustainable modes of travel. The stated need for additional land to expand the cemetery at Minehead is noted. These considerations will be taken into account in the next stage of Local Plan preparation.

See Appendix 2 for details of sites suggested for development.