

Whom	Comments Made	Action Taken
Creech St Michael Parish Council	<p>1. On Page 43 the Para starting Creech St Michael confused us. We would suggest a form of words agreed by both our PCs and the District Council is included instead in both of our NHPlans reflecting that the Urban Extension spans our Parishes. Explanation provided by CSM in response to query: Essentially the PC recognised that your plan referred to the MH2 and Land South of Langaller sites which have large areas outside of the plan area.</p> <p>The PC therefore suggested a form of words be agreed between ourselves and SWTC that will appear in both (amended) plans setting out that the urban extension area in order to give clarity to its location across the Parishes. The alternative is that the plan should limit itself to the plan boundary. Examples are the aspiration expressed in the plan to have an employment site at the end of Hyde Lane or for bungalows in MH2.</p>	<p>Explanation of urban extension boundary amended in 'Definition of Neighbourhood Plan'.</p>
Creech St Michael Parish Council	<p>2. We recognise that there are some fields south of and next to the M5 that are in West Monkton Parish. As these are adjacent to the CSM Green Wedge (which in turn is an extension of the Ruishton Green Wedge) the PC suggests that the green wedge be extended to include these fields.</p>	<p>WM&CF NP has not addressed the green wedge specifically as this is an SWT policy matter. But discussions with SWT about the MH2 guide produced by SWT include reference to the use of the green spaces between the proposed settlement and the motorway as part of a 'green necklace' extending round the Urban Extension.</p>
Creech St Michael Parish Council	<p>3. Footpath and Cycling. CSM PC would like to see improved links with its neighbouring Parishes incl WM. We would ask that where the plan refers to links to Taunton and Safe routes to School these are strengthened to make them even more explicit that improving access to adjoining Villages is an aim too.</p>	<p>added to transport objectives</p>
Creech St Michael Parish Council	<p>We would also advise that Highways England have agreed in principle to their reopening the two tunnels under the M5 and have agreed to inspect onsite this month.</p>	<p>noted</p>
Creech St Michael Parish Council	<p>The PC also suggest that an access to the proposed sports site from Hyde Lane close to the cottages in Hyde Lane is provided (Map26).</p>	<p>Initially refused to consider by TDBC when suggested by WMPC, now part of dialogue with SWT.</p>
Creech St Michael Parish Council SWT Ann Rhodes	<p>4. Page 52 refers to the proposed Langaller Industrial site which mostly falls in this Parish. CSM PC does not see the need in the post Covid world for the Langaller Site; particularly given Nexus, the expanded Walford Cross industrial site and the other sites you refer to. As Langaller has category 8 permission this could create a noisy industrial activity adjacent to the proposed housing to be sited in your Parish. CSM PC suggests that all the Langaller Employment site area be included for housing from the outset with the provision made for additional business activity on the land adjacent to the Walford Cross Employment site</p>	<p>P52 states SWT policies CS policy SS1. Part of Langaller site has already been 'relinquished' for housing.</p>
SWT Ann Rhodes	<p>West Monkton & Cheddon Fitzpaine Neighbourhood Plan Reg 14 Consultation</p>	
SWT Ann Rhodes	<p>West Monkton and Cheddon Fitzpaine Parish Councils are the first in the Somerset West and Taunton (SWT) are to undertake a neighbourhood plan review. It is clear from the document that a great deal of thought and time has been invested in this revised neighbourhood plan.</p>	
SWT Ann Rhodes	<p>The following comments and observations are provided from different specialisms within SWT. It is possible that different specialists will take varying, perhaps opposing, views on the same topic or policy. It is important therefore to balance those observations with the legislative context of neighbourhood planning and the neighbourhood planning guidance issued.</p>	
SWT Ann Rhodes	<p>General:</p>	
SWT Ann Rhodes	<p>There are multiple references to TDBC in the document where it should be superseded by SWT (for example Pg.12 first sentence). It may make things easier to put a sentence at the front of the document stating that any reference to The Local Planning Authority or the District Council should be read as SWT, and any reference to the previous council in document titles is referring the former area to which they relate; rather than have to find and replace in the entire document.</p>	<p>corrected</p>

Accuracy with reference to the NPPF is important however it will be revised over the lifetime of the neighbourhood plan so suggest that when generally talking about the NPPF remove ref to its date, but where quoting sections add para number and date of that publication. For example: Pg.13/14 – “National planning policy is set out by the National Planning Policy Framework (NPPF) revised in February 2019. The NPPF makes a number of references in support of neighbourhood planning including: *‘Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies’*. Para 29, NPPF (February 2019)’.

SWT Ann Rhodes done

It is a fine balance between making the document easy to open or download and providing sufficient clarity in images to help inform the reader, as maps and photo’s are by their nature very memory intensive. In the submission document these should be as clear as possible and SWT can help with higher resolution images of any items we’ve produced. For example Pg.20 Neighbourhood Area Map.

SWT Ann Rhodes noted

Preface:

Reference to CIL: update to reflect that you currently receive 25% of CIL.

SWT Ann Rhodes done

Introduction:

Pg.2 Reference to planning policy documents: Pg.9 this first reference to the Core Strategy may not be needed here as you appear to be painting the picture of garden communities and climate; and you have a separate section on planning policy further down. If you chose to mention policy documents on Pg. the Core Strategy was adopted in 2012 and covers the period 2012 to 2028. It is part of the suit of documents which include the Site Allocations and Development Management Plan adopted in 2016, for completeness as this document has policies applicable to the area so should be referenced.

SWT Ann Rhodes

Pg.2 Reference to the number of councils declaring a climate emergency is a changing picture, so if you want to reference it ass clarifier i.e. “at the time of the publication of the plan X out of Y...”

SWT Ann Rhodes Included: at the time of the publication

[Pg.2 For clarity: the Climate Positive Planning doesn't set policy, it provides guidance and explanation to support existing planning policies of adopted local plans. The final approved version is at https://www.somersetwestandtaunton.gov.uk/planning-policy/climate-positive-planning/](https://www.somersetwestandtaunton.gov.uk/planning-policy/climate-positive-planning/)

SWT Ann Rhodes noted

Vision and Objectives:

Housing

As currently written the objective of seeking an increase in the proportion of 1 and 2 bed dwellings to allow first time buyers and downsizers to remain (page 35) does have a risk that that this could encourage, particularly in affordable housing terms, schemes with a large percentage of 1 beds potentially in the form of flats, which may not be the aim of the Neighbourhood Plan.

SWT Ann Rhodes leave as is

For info: SWT seeks a broad mix of bedroom sizes. Although affordable housing demand is highest for 1 beds to enable sustainable and successional living on large developments the starting point for consultation and pre-app is:

SWT Ann Rhodes

- 10-15% - 1b2p
- 40% - 2b4p
- 35-40% - 3b 5/6p
- 10% - 4b6p

SWT Ann Rhodes

These percentages are revised on site-by-site around scheme specific progress.

Distinctive Design

This aim is supported, a note that locally distinctive design/materials reflecting the character of the area and innovative architectural and highly efficient buildings is not necessarily an “and/or”. It is possible to design a building to be energy efficient, utilise renewables and be climate resilient whilst respecting the context within which they are delivered; this is good design.

SWT Ann Rhodes

Zero carbon is not required in national or local policy so suggest supporting the move towards zero carbon buildings.

SWT Ann Rhodes amended

Housing

Housing General:

Government has stated that the intend to introduce by Ministerial Statement a new tenure of affordable homes called First Home. This change is due imminently and will have a six-month transition period. A neighbourhood plan submitted for Examination within 6 months of the product being introduced does not have to reflect the new product in its policies; however the group should be aware that this Government Ministerial Statement will affect how the tenue of affordable housing is proportioned in the furture.

SWT Ann Rhodes all housing amendments done

SWT Ann Rhodes

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 SWT Ann Rhodes

National and Local Housing Policies

Suggest adding reference to Core Strategy DM5 which promotes sustainable design and use of resources in new housing development.
 Policy H1

SWT Ann Rhodes

The sentence "Often older people can remain living independently with a little support, this would help our hospitals reduce bed blocking and provide a happier elderly population" reads as clarification and therefore suggest it should be on the supporting text rather than the policy.

SWT Ann Rhodes
 SWT Ann Rhodes

Similarly with the sentence "This policy is in line with the SCC strategy for caring for older/vulnerable people in their own homes wherever possible" the document quoted may change over time; but you are referencing it in this instance in support of your plan so it should go in supporting text with a link to the document.

Policy H2

SWT Ann Rhodes
 SWT Ann Rhodes
 SWT Ann Rhodes
 SWT Ann Rhodes

The policy could be re-focused on requiring high quality design which appropriately responds to the distinctive local context whilst delivering modern, energy efficient and climate resilient design. Reference to use or reference to traditional materials specifically in prominent locations whilst noting that innovative architectural designs that still meet the "appropriately responds" may be acceptable as well as keeping the new policy H5.

Policy H3

[Suggest that explicit reference is made to the SWP Developer Guidance - https://www.somersetwaste.gov.uk/developer-guidance/ in the supporting text.](https://www.somersetwaste.gov.uk/developer-guidance/)

Policy H4

SWT Ann Rhodes

H4 Justification: Recent work has established that Cheddon Fitzpaine and West Monkton villages fall into the category of a designated rural area. This triggers affordable housing at 5 dwellings – the urban extensions are an exception to this. Suggest the statement 'It is 10 units or more in urban areas' is amended to reflect this.

[H4 Justification: affordable housing should meet the latest Homes and Communities Agency Design and Quality Standards, as Homes England no longer have mandatory space standards. Suggest this is updated The 2021-2026 Homes England Affordable Homes program includes: 'Encouraging uptake of the National Design Guide, which is part of the government's collection of planning practice guidance within the National Planning Policy Framework'. In addition, suggest that SADMP D10 Dwelling Sizes is referenced and this should apply to all dwellings.](#)

SWT Ann Rhodes

H4 Justification: Given that the definition of affordable housing in the NPPF supersedes that of the TDBC SPD, and with impending changes to that with the New Home product; suggest affordable definitions are referenced to those in the NPPF.

SWT Ann Rhodes

H4 Justification: The official name for the Self-Build Register is: the Register of Interest in Self-Build and Custom-Housebuilding, it is also known as Right to Build Register (though I would recommend using its official name).

SWT Ann Rhodes

H4 Justification: for information: At the time of your review the number of person on the register at March 2021 stands at 93, however only 1 person listed West Monkton as their first choice of preferred locations, 1 as Monkton Heathfield, 0 for Cheddon Fitzpaine. Further entries may include Monkton and Cheddon where descriptions were: "Around Taunton"; "Commuting distance from Taunton"; "within 5miles of Taunton"; "Taunton Area" x2; "Area around Taunton"; "within 10 miles of Taunton"; "15mile radius of Taunton".

SWT Ann Rhodes
 SWT Ann Rhodes

Policy H4:

NPPF states that viability should be primarily considered at the plan making stage and only at the application stage when properly justified. So in the case of policy compliant schemes it should be assumed to be viable unless justifiably evidenced otherwise. This restricts the ability to require a viability assessment as a matter of course. Perhaps add links to the NPPF and PPG guidance on viability.

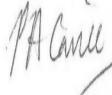
SWT Ann Rhodes
 SWT Ann Rhodes
 SWT Ann Rhodes
 SWT Ann Rhodes

The affordable housing split is a laudable aim; but as previously mentioned national policy changes may affect the delivery of this.

Suggest the Affordable Housing definitions are referenced to those within the NPPF rather than the SPD, given the pending Ministerial Statement.

Policy H5

SWT Ann Rhodes

 requiring all new build and extensions/renovations to address the climate emergency as far as is reasonably and viably possible this aimed in the opening sentence and then reference to encouraging zero carbon emission buildings. Would this also apply to Change of use? Some conversions or Listed Buildings for example may not be able to comply; and it would not be possible to require the whole building made zero carbon.

SWT Ann Rhodes

The policy could be strengthened with clarity about what is meant by "a demonstrable amount" and "net emissions rate of zero or below". Is there a link with the Building Regulations: Part L?

SWT Ann Rhodes

Passivhaus is one of a number of recognised quality regimes providing certification; however, the schemes are the performance monitoring to ensure that they perform as intended.

Self-build housing should be a sperate policy, or perhaps included the affordable housing policy, as H5 is about the efficiency of the development in general, rather than specifically Self-Build.

Bullet point 1: this could be read as solar gain being wherever practicable as well as solar panels, and solar gain can be required in line with NPPF and DM5. Suggest that reference to maximising solar gain whilst ensuring strategies to avoid overheating. The need for solar panels would be a response to the feasible and viable emissions reduction target. Whilst they are practicable on any roof that has been designed to be sufficiently strong enough there is a cost to their inclusion. Suggest consideration of emphasis that roofs are at the very least are designed to be capable of accommodating PVs in the future without a need for additional structural reinforcement.

Bullet point 2: Suggest that a fabric first approach is taken to efficiency, which is more beneficial in reducing carbon emissions and reducing fuel poverty than just solar panels and direct electric heating.

Bullet point 3: Suggest moving reference to flood risk to a separate bullet point and remove reference to nutrient neutrality as they're not directly related to water efficiency/resilience. For information: Compliance with phosphates neutrality (the issue identified as significant to the Levels and Moors RAMSAR site) is essentially required by TDBC CP8 which requires mitigation for significant effects upon European Sites. Suggest single bullet point referring solely to the national optional BR standard of 110 litres/person/day which the requirements in TDBC DM5 equate to.

Bullet point 4 (as with bullet 2): suggest this will be a product of the feasible and viable emissions reductions. Perhaps amend to refer simply to heating from low carbon and renewable sources, with site-wide solutions being explored for the urban extensions.

Bullet point 5: Perhaps this is more relevant within a design policy; linking it with usable outdoor space and the benefits this has on health and wellbeing.

[Bullet point 6: Whilst there is no strategic policy explicitly requiring EV charge points, the strategic direction is there in CP6 to be in broad conformity with. Suggest reference to the model policy requirements included in the Somerset EV Charging Strategy - https://www.somersetwestandtaunton.gov.uk/climate-emergency/electric-vehicle-charging-strategy/.](https://www.somersetwestandtaunton.gov.uk/climate-emergency/electric-vehicle-charging-strategy/)

Bullet point 7: Please see comments in relation to H2 above. It only needs to be in one policy. There is a question around how it is determined whether a material is compliant with the declarations. May it be better to refer to high quality, energy efficient, climate resilient and sustainable materials which maximise opportunities to reduce embodied carbon (e.g. through re-use and individual material properties and provenances) and carbon storing potential of buildings (e.g. through building with biomass etc.).

Bullet point 8: This would be a product of the feasible and viable emissions reductions. As there is reference to low carbon heat already in the policy is this referring to power generation from on-site renewable sources? It is difficult to require specific % of energy (e.g. 20%) to be from on-site renewable sources (a Merton Rule policy) as DM5 is inherently flexible with regards to how carbon emission reductions are delivered and that would possibly stray away from general conformity without viability and furthure evidence.

Bullet point 10: is this repeating H3? It need only be in one policy.

Bullet points 11/12: Suggest it is helpful to explain the intention. For example: "should..."provide built in and permanent biodiversity measures in response to the outcome of ecological survey, designed to support retention and establishment of key species..." such as..."

Conformity with Core Strategy: Suggest this could be expanded significantly and reference made to policy DM5 in particular. The NP must be in general conformity with the strategic policies of the adopted development plan. Climate Positive Planning is not emerging policy, it is a re-statement of and additional guidance to support existing adopted planning policies, including policy DM5. Though you might want to use CPP to inform the justification that is provided.

TDBC Policy DM5 refers to zero carbon requirements, but these are in relation to the Code for Sustainable Homes and the National Zero Carbon Homes policy that were both cancelled. As such the Council cannot require zero carbon homes through DM5, but the policy still remains, and the strategic intent and direction is still zero carbon homes. The neighbourhood plan could go beyond encouragement where it to provide further detail and possibly also viability assessment.

Transport

Policy T1

Suggest that with regard to the last bullet point this refers to "in close proximity to essential services and facilities" or "local centres". Perhaps this should be focussed on the urban extensions that provide these; currently it could be read that a covered cycle parking station is required outside a domestic extension. Is there a reason for "covered"? Is there clarity on what is meant by "high quality" - is it aesthetics, materials, location, accessibility?

Employment

Policy E1

amended

A new Class E came into force last year, so this policy should be amended to reflect the changes. Suggest that the similar classifications may be:

- **E(g)** Uses which can be carried out in a residential area without detriment to its amenity:
- **E(g)(i)** Offices to carry out any operational or administrative functions,
- **E(g)(ii)** Research and development of products or processes
- **E(g)(iii)** Industrial processes

[Please check to see if there are any other relevant definitions or any specific class that you may want to include in your definition of start-up units - https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)

Policy E3

[The footnote under the policy should be updated to reflect the amended Use Class Order - https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)

Recreation and Environment

General

Although there is key linked between recreation and the environment, existing and approaching policy and legislation suggest that the 'environment' may warrant and independent chapter. Sometimes recreation and environment have a detrimental impact on each other for example recreation and green infrastructure where the latter may have a detrimental impact of the natural environment and associated priority habitats and protected species.

Objectives

Suggest that reference is made to Hestercombe SAC, SSSIs, LNR and LWSs making up key features within the local ecological network and nature recovery network and the individual sites management plans and conservation objectives within the sentence *"Any future development within, or in close proximity to the Quantock Hills AONB should..."*.
 Second Bullet: Suggest that "and nature recovery" is added to *"protect and enhance the NP area heritage, landscape and wildlife assets; and support initiatives to combat climate change"*

Context

Suggest reference to Gadds Valley LNR be removed from here as this area was "de-designated", and may not have public access anymore, and it's been removed from the neighbourhood plan Local Green Space list.

At the time of the original neighbourhood plan the phosphates issues on the Levels & Moors were not known about. However, it may be worth mentioning that a Weakness, phosphates within the Ramsar catchment, and also Opportunity, with long term phosphate mitigation, providing phosphate reduction as well and BNG and Carbon offsetting, has subsequently come to light with the Natural England letter of August 2020.

Policy R1

The bullet points reads as supporting text as they explain how the protection of Dark Sky's required in the policy will be achieved. The general point about impacts on wildlife and in particular bats is relevant to the policy text.

Policy R2

For clarification the Environment Bill at present is just a Bill, it has not received Royal Assent and so there is currently no legislative requirement for developments to achieve biodiversity net gain. A Bill is also subject to change before it becomes an Act. Therefore suggest that it is referenced in the supporting text instead with "the proposed...in the Bill...is an aim the PC would like to see implemented", "the current national policy and guidance..", etc.

The text "because access to quality green space (not just grass fields, but higher-level habitats including trees, natural blue / green features such as ponds / bogs wet areas/species rich spaces etc) has been scientifically proven to have a number of important benefits:" should be in the justification for the policy rather than the policy.

Suggest that the policy could be more specific about what is defined as Green Space. For example: "green space is defined as areas of usable and publicly accessible land over 0.4ha. These can be mixed use areas, containing...."

Natural green space, as well as amenity green space, is important when taking ecological emergency strategies. Suggest ensuring that all new existing green spaces, as much as they are able to, accommodate habitat for pollinators and work towards the key objectives within the Somerset Pollinator Action Plan.

amended
all amendments made

Protection and enhancement of biodiversity is referred to in Core Strategy policies CP1 and CP8, and taken with the NPPF paras 170 (d) and 174 a case could be made for requiring net gain through this policy. Suggest reference is made to the fact that national policy and metrics may supersede this policy and the metrics/procedures referred to.

Policy R3

Second Para: Suggest that "There should be no development within flood zones 2 and 3, taking account of climate change for the lifetime of development, unless in accordance with the National Planning Policy Framework sequential and exceptions tests, and National Planning Policy Guidance" goes beyond the purposes of the policy (flood attenuation). It replicates national and local policy but also possibly gives the impression the neighbourhood plan policy is more exacting (i.e. no development, whereas NPPF says to steer development away and guidance explains what is acceptable development in different floodzones). Development in FZ2 and 3 is permitted inline with NPPF, there is standing advice for extension and some minor developments, there is the sequential test and exceptions test for development.

Second Para: An observation is that Environmental Net Gain is more than just biodiversity net gain. A definition would help the application of the policy and whether it is in general conformity or not. Perhaps a holistic look at environmental net gain may be more appropriate. Perhaps a demonstration/assessment of the losses of all the benefits provided by the natural environment – including, but not limited to, understanding that many natural capital assets are a. are spatially and context specific; b. provide a service because of where they are located; c. operate at a number of scales including river-catchment, coastal-sea and landscape; d. are often not linked to biodiversity 'habitat' types - and could consider maximising ecological gains; promoting a coherent network of habitats; providing benefit to those people who currently experience the lowest quality environments; proximity and providing benefits as close as possible to where the impact occurs.

Fourth Para: Suggest that "reducing the water footprint, or increasing water efficiency" could go in H5 and in this policy consider being more specific and reference rainwater harvesting and use of raingardens / SUDS.

Fifth Para: suggest "which may be innovative" could be reworded to highlight that utilising nature-based solutions ("soft solutions") first/above engineered solutions ("hard solutions") wherever possible is preferred.

Bullet point 1: suggest refer to emerging Somerset SUDS guidance, which should be in place by the time of the Examination and adoption.

Policy R5:

Football Pitches at Mkh Ph1: Suggest a tweak to the wording to say football pitches will be needed in future but recent areas of growth in the sport have don't currently require new pitches; something like "...not currently needed. as growth in football has been in the youth and women's teams..."; "...provision for football will be sought as part of MH2..." and also suggest that "...Discussions are ongoing to provide rugby and cricket on the site, as recent growth in these sports has seen a need for new capacity for the local teams"

Policy R6

Suggest referring to the full suite of benefits of trees and hedgerows rather than just saying they are important for responding to the climate emergency. Policy ENV2 of the SADMP (which this policy is looking to build on) refers to it being about wildlife, biodiversity, landscape and amenity.

How does an applicant know what "plentiful" means and how does a decision making determine whether it has been complied with? Suggest look at the wording to see if this can be defined or clarified in the supporting text or policy.

First Bullet Point: is there a need for the planting of the right trees for the right purpose in the right places bearing in mind the full suite of benefits they can provide in different circumstances. Suggest that tree planting can also contribute to: health & wellbeing; biodiversity; supporting wildlife; grow & green addenda. Perhaps at beginning "Appropriate trees for the location and surrounding context..."

Bullet point 2: Policy ENV1 of the SADMP states that Development which would result in the loss of Ancient Woodland, Aged or Veteran Trees will not be permitted. It also talks about providing a net gain. It might be appropriate here to expand on that, for instance requiring replacement with like for like species, but perhaps at a rate of 3 for every 1 lost for instance, whilst still retaining the general preference for retaining and protecting existing trees?

Bullet point 4: Suggest that there need to be a was of measuring the current biomass and therefore "equivalent replacement in terms of biomass".

Bullet point 4: Suggest that care needs to be taken not to conflate biodiversity net gain and net gain in trees etc. sought by policy ENV1. Biodiversity net gain is potentially related, but this policy isn't seemingly otherwise about this.

Bullet Point 7: not clear if "Some of the hedgerows could be laid" relates to this bullet about tree stakes and British grown stock.

Bullet point 8: It is assumed that the intention of this bullet is about management plans providing an appropriate way to secure ongoing stewardship of trees, hedgerows and open spaces; however it does not read that clearly. Suggest consider rewording it.

SWT Ann Rhodes
SWT Ann Rhodes

Community Actions

Community Actions whilst not examined as part of the neighbourhood plan process are always a useful and effective way of establishing priorities as well as highlighting and addressing issues which are not covered by planning policy. Examiners are particularly supportive of Community Actions in neighbourhood planning documents.

SWT Ann Rhodes
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CA1

Suggest "and where bus stops are formed, bus shelters also" be incorporated in to the sentence before/prior to it.

done

Other Matters:

On 17 August 2020 SWT received a letter from Natural England about high levels of phosphates in the Somerset Levels & Moors Special Protection Area (SPA). In light of a court Judgement (known as Dutch N) and the unfavourable condition of the Somerset Levels and Moors Ramsar Site, the Council needs to understand whether there is likely to be a significant adverse effect from development and, if required, an appropriate solution. This has caused a delay to the granting of planning permission and a backlog of applications. The Council is taking advice on whether this also impacts on planning policy documents and their preparation. Since August 2020 SWT has: published a Natural England approved phosphates calculator, to provide a transparent and rapid calculation of net phosphate loading from developments, including phosphate offsetting calculations for on or off-site locations; published advice for small scale development; and commissioned a county-wide nutrient strategy to identify both short term solutionsn the degree of change which the modification involves:

- Minor (non-material) modific

added

SWT Ann Rhodes
SWT Ann Rhodes

Conclusion

It is clear that a great deal of thought and time has been invested in the revised neighbourhood plan; and SWT hope that the observations in this representation are useful in refining of the document.

[comments sent as pdf](#)

SWT Ann Rhodes
Jane Hennell CRT

back in the office 22 Feb. Thank you for your email regarding the Regulation 14 consultation on draft Revised Neighbourhood Plan for West Monkton and Cheddon Fitzpaine. We work closely with local authorities and local communities who are preparing a plan and, as the Bridgwater & Taunton Canal runs through the parish, we welcome the opportunity to comment on the revisions to the plan to ensure the Canal is properly protected and promoted and the multi-functional benefits that the waterway can bring to the area is properly recognised.

The Trust has very recently launched a new document 'What your local waterway can do for your community - a planning guide for waterways in Neighbourhood Plans'. The Bridgwater & Taunton canal runs for 14 miles in total and passes through the heart of this neighbourhood. We note that the community hold the canal in high regard and enjoy using it regularly. It is therefore important to ensure that any new development planned in the two parishes does not have an adverse impact on the canal or result in its degradation in some way, but instead it is protected and improved for the benefit of all.

The Trust considers the canal to be very important, multi-functional, cross boundary asset but in this area it is used particularly as - a sustainable transport route linking the area to the heart of Taunton - an ecology corridor linking the proposed country park to Hestercombe - and a recreational asset which can be further developed to provide on and off water recreation and improved facilities such as the community cafe.

The Neighbourhood Plan is an opportunity to set out how the local communities wish to see the canal corridor develop in the future and in general we welcome the revisions to the neighbourhood plan and support the revised goals and objectives.

We would like to offer the following detailed comments which predominantly relate to the new additions in blue, except where comment raised by the Trust in relation to the original plan are still applicable and need further consideration.

Detailed comments: Policy H5 We support the aims of this policy however we wish to draw attention to the possible use of canal water for providing carbon net zero heating and cooling and ask that the fourth bullet point is amended to read 'Heating such as air, ground, and water source, biomass...'. The Trust promote the use of our waterways as a renewable energy resource - eg using canal water for heating and cooling buildings and we welcome early engagement from developers or owners of commercial buildings wishing to consider retrofitting more sustainable energy sources. More information on this can be provided by the Trust and this form of energy is likely to become increasingly in the future. The Canal and River Trust is taking part in various smart energy trials elsewhere in the country at present looking in more detail at how canal water can be used as a sustainable energy source with no harm to the environment.

Transport: It is suggested that the use of the canal towpath NCN 3 for both recreational and commuter cycling and walking will increase following the covid 19 pandemic. Increased usage of up to 400% has been recorded elsewhere in the country as a result of the canal being used as a local recreational resource during lockdown. This increased usage is expected to continue. We are concerned that policy T1 seeks to link new development to existing provision, and we note that this now includes the waterways. However the policy does not account for the increased degradation of existing provision following the increased usage as a result of these new linkages. We suggest another bullet point is added to ensure that existing provision is enhanced if increased usage is likely to occur because of new development.

Recreation and Environment: We request that the bullet points on page 68 are amended: - enhance the historic environment and preserve the significance of historic assets, including Listed Buildings, Conservation Areas, non-designated historic assets and important archaeological sites: seek to improve the canal towpath between Bathpool Swingbridge and Taunton as a multi-functional asset for the benefit of all users (this to replace bullet point 7 entirely).

The Canal and River Trust consider the canal is a non-designated heritage asset. The NPPF and Local Plan considers non-designated assets as well as those with formal designation and the Neighbourhood Plan should reflect this.

The Trust believe that improvements to the canal towpath should be for the benefit of all users but is concerned that the term 'user-friendly for cyclists and pedestrians' may exclude other users such as wheel chair users or imply that only the surface of the towpath needs improvement when in fact the towpath can be improved in any number of ways. Thank you for consulting us on the West Monkton & Cheddon Fitzpaine Neighbourhood Development Plan. This email forms the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

We note that this Development Plan has been revised since the original Neighbourhood Plan in 2017, in which Network Rail provided comments. We have therefore reviewed the Neighbourhood Plan and provided further comments relating to the revisions.

Transport Policy T1 seeks development to provide safe and convenient public cycle and footpaths which comment with existing foot and cycle networks within the NP area. Network Rail have a level crossing located over the railway where public footpath 5/13 crosses the railway at Cheddon Fitzpaine, TA2 8RX. An urban extension is allocated north of the railway, additional usage and the change in environment surrounding the crossing would likely lead to an increased safety risk. Any additional users of this public footpath through additional linkages or development close by, may require mitigation to ensure the works does not have an adverse effect on the risk to users of the level crossing.

The plan provides a list of headings for the parish council's Regulation 123 list of items to be funded by Community Infrastructure Levy, the crossing is located in Cheddon Fitzpaine Parish and their list includes 'support for infrastructure required by the new development for the benefit of the Parish: footpaths; cycleways', we request that this is amended to include 'improved safety at level crossings'. Mitigation would maintain the safety at the crossings (should the risk increase because of the changes in the footpath network or from development nearby), which might be in the form of a footbridge if required.

I have spent some time working through the doc, however I have run out of available time. Due to limited capacity, going forward we are due to be create a standing advise document for commenting on NP's which is likely to include the following:

Policy H5 amended.

Transport comments added to 'What difference will it make'.

Recreation and environment bullet points amended, and non-designated heritage asset reference added.

R4 moorings 'need to consult' added.

Support for a bridge over the canal is seen as a positive step forward.

added to Transport Justification
Footbridge comments seen as a very positive step forward

CIL list amended

Emily Johnson Network Rail

Simon Breeze SCC Ecology

Simon Breeze SCC Ecology	The protection of existing ecological networks and opportunities to restore and enhance these networks through good development design, in accordance with paragraphs 170(d) and 174(a) and (b) of the National Planning Policy Framework 2019 and Somerset West and Taunton environmental policy.	added to R2 justification
Simon Breeze SCC Ecology	The protection of priority habitats and species and opportunities to secure measurable net gains for biodiversity through good development design, in accordance with paragraphs 170(d) and 174(a) and (b) of the National Planning Policy Framework 2019, the draft Environment Bill and Somerset West and Taunton environmental policy.	added to R2 conformity
Simon Breeze SCC Ecology	The aims and objectives of Somerset County Council's Somerset Pollinator Action Plan (see https://www.somerset.gov.uk/waste-planning-and-land/biodiversity/#Somerset-Pollinator-Action-Plan), to protect and increase the amount and quality of pollinator habitat and manage greenspace to provide greater benefits for pollinators.	added as footnote to R2 policy
Simon Breeze SCC Ecology	External lighting schemes should fully accord with <i>Guidance Note 08/18 Bats and artificial lighting in the UK</i> (ILP and BCT 2018). Lighting should be designed so that areas to be lit will not disturb or prevent bats using their territory or having access to their resting places, in order to maintain the 'Favourable Conservation Status' of populations of European Protected Species and in accordance with Mendip District Local Plan Policies DP5 (Biodiversity and Ecological Networks) and DP6 (Bat Protection).	added to justification R1
Simon Breeze SCC Ecology	Mitigation and adaptation measures for climate change and opportunities to ensure future resilience to climate change impacts (such as nature-based solutions), in accordance with paragraph 149 of the National Planning Policy Framework 2019 and the climate and ecological emergency (declared by both Somerset County Council and Somerset West and Taunton Council).	added to conformity H5
Simon Breeze SCC Ecology	The statutory requirement associated within the Dutch N case, to ensure development reaches nutrient neutrality, should be considered for all new allocation sites.	added to conformity H5
Simon Breeze SCC Ecology	Although there is key linked between recreation and the environment, existing and approaching policy and legislation suggest that the 'environment' warrants and independent chapter. This is especially relevant were recreation and 'green infrastructure' can have detrimental impacts to natural environment and associated priority habitats and protected species.	added to introduction of Recreation and Environment section
Simon Breeze SCC Ecology	A NP needs to provide natural green space, as well as amenity green space in order to tackle ecological emergency strategies.	added to objectives
Simon Breeze SCC Ecology	<i>Any future development within, or in close proximity to the Quantock Hills AONB should ...</i> and Hestercombe SAC, SSSIs, LNR and LWSs making up key features within the local ecological network and nature recovery network and the individual sites management plans and conservation objectives.	added
Simon Breeze SCC Ecology	<i>protect and enhance the NP area heritage, landscape and wildlife assets; and support initiatives to combat climate change ...</i> and nature recovery (note - a mandatory requirement under the environment bill)	added
Simon Breeze SCC Ecology	Establish nutrient neutrality for all new development which is likely to add additional phosphates to the Somerse4t Levels and Moors Ramsar site	added
Simon Breeze SCC Ecology	Ensure all new and existing green spaces accommodate habitat for pollinators and work towards the key objectives within the Somerset Pollinator Action Plan.	added
Simon Breeze SCC Ecology	Weakness – within the Ramsar catchment	
Simon Breeze SCC Ecology	Opportunities: Phosphate mitigation, of which long term mitigation will provide benefits to P reduction as well and BNG and C offsetting.	added to table

National Grid National Grid House Warwick Technology Park Gallows Hill Warwick, CV34 6DANational Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above document we have identified the following National Grid assets as falling within the Neighbourhood area boundary:

Electricity Transmission Asset Description

ZZ ROUTE TWR (004 - 082): 400Kv Overhead Transmission Line route: HINKLEY POINT - TAUNTON 1

A plan showing details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

National Grid also provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ Please see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com Further Advice Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director,
nationalgrid.uk@avisonyoung.com.

Avison Young
Central Square
South Orchard Street
Newcastle upon Tyne NE1 3AZ

Spencer Jefferies, Town Planner

hox.landandacquisitions@nationalgrid.com

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on the draft revised West Monkton & Cheddon Fitzpaine Neighbourhood Development Plan.

However, we would recommend that you acknowledge the issues concerning phosphorous pollution in the catchment of the Somerset Levels & Moors Ramsar Site. Although your Neighbourhood Plan does not allocate sites for housing, there will be housing sites within your Neighbourhood Plan area that are affected. There may be opportunities for your community provide mitigation solutions that also help to achieve other objectives, such as outdoor recreation space and access to nature, biodiversity gains and climate change mitigation/adaptation, etc.

Thank you for providing Highways England with the opportunity to comment on the revised draft Neighbourhood Plan for West Monkton and Cheddon Fitzpaine 2021-2028 - Regulation 14 consultation.

Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in the Plan area comprises the M5 motorway to the far east of the Plan area.

The Plan area area contains a large part of the emerging Taunton Urban Extension (UE) comprising Monkton Heathfield and Priorswood/Nerrols. The UE, when complete, will include in the region of 5,400 new homes, additional employment land (22.5 Ha), new primary and secondary schools, local shops and other community facilities and green space. Highways England has recently been consulted on the Somerset West and Taunton (SWT) Local Plan Review Issues and Options report, which forms the first stage of preparing the new SWT Local Plan 2040. We would welcome clarification on how the West Monkton and Cheddon Fitzpaine Neighbourhood Plan will seek to reflect and align with the emerging Policies and allocations of the overarching Local Plan as this progresses through formal consultation.

position of overhead transmission route noted

Comments on phosphate issue from SWT and SCC Ecology already included

National Grid

Natural England
Natural England

Natural England

Highways England
Highways England

Highways England

Highways England

The scale of development and associated policies proposed within the draft Neighbourhood Plan are considered unlikely to result in a severe impact on the safe and efficient operation of the strategic road network. These comments do not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.

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I trust the above is clear, but please do not hesitate to contact me should you wish to discuss further.

swift bird boxes, holes for hedgehogs in fences ref gov statement <https://www.gov.uk/government/news/five-simple-steps-to-transform-gardens-in-to-hedgehog-havens> Response from Graeme Thompson SWTC confirms the NPPF has relevant policy but no specific policy in SWT. included as general example, otherwise would need to produce comprehensive list of species and how accommodated by the NP.

Thank you for referring the above draft revised Neighbourhood Plan, which was received 18 February 2021.

The Environment Agency supports the amended policy revisions especially those adapting to climate change, connecting open spaces, and creating opportunities for nature.

We support sustainable development, in particular the encouragement of resource efficiency, waste minimisation and recycling.

The concept of Water Sensitive Urban Design (WSUD) is encouraged, and the following CIRIA guidance document provides useful information on the concept and how to apply it in urban planning – [wsud_ideas_book.pdf](#) (susdrain.org)

We support policy R3 Flood Attenuation directing development away from flood zones 2 and 3, and encourage natural flood management schemes, which is a holistic concept and is most effective when not limited to individual development sites. It links closely to Water Sensitive Urban Design and to the preservation and building of soils.

Wastewater infrastructure improvements are particularly encouraged as nutrient enrichment in the surrounding area is particularly sensitive and would be welcomed.

We would encourage wetlands and reed beds for nutrient stripping, although it must be ensured that there is no increase of flood risk to third parties.

Planning obligations contributing to phosphate stripping, carbon sequestration and biodiversity net gain should be required for all development.

We support and encourage the principles of Net Gain, (as well Community

Infrastructure Levy and Section 106), to make contributions for environmental gains
End 2

repliedto Highways England

noted

added to R3 justification

added to R3 justification

added to R2

Environment Agency	either on or off-site. This Net Gain aspiration is detailed in the National Planning Policy	added to R2 'What difference will it make'
Environment Agency	Framework and is further supported by the 25 Year Environment Plan. This sets an	
Environment Agency	expectation for development, including housing and infrastructure, by all organisations	
Environment Agency	and individuals, that will help deliver net gain.	
Environment Agency	If you wish to discuss any of the above I can be contacted on the number below.	
Environment Agency	Please quote the Agency's reference on any future correspondence regarding this matter.	
Environment Agency	Yours faithfully	
Kelvin Brown	Title page : I'm not sure if there is a convention to this, but I was surprised to see the plan start date changed from 2017 to 2021. The NP has been in force since the referendum and should there need to be recourse to the document as originally prepared (e.g. for a retrospective planning enquiry) then there may be some doubt about validity etc. Also if we change the date on the front of the document is it more likely that this will be seen as a major NP revision and therefore increase the chances of requiring a further referendum?	no change
Kelvin Brown	My suggestion would be to preserve the original dates but acknowledge v2/1.1 or whatever with the revision date on the front page, complementing the explanatory text on page 2.	check with Ann
Kelvin Brown	General : Do we want to acknowledge the Unitary debate and potential to realign to whatever system of local government applies when the dust has settled?	mentioned
Kelvin Brown	Section 3 p 28: Revised text reads : "attempted to include an awareness of the need for climate change in every objective and its policies" - I presume we are missing a word such as mitigation or a statement which seeks to address the impacts of climate change?	done
Kelvin Brown	H1 : I'm not sure why some text in the first additional bullet is highlighted, but I would guess that it may be considered too specific to include in the policy itself. I agree it probably sits better in the Justification or "What difference will it make" sections.	no change
Kelvin Brown	H2 & H3 now combined into H3 which only refers to Refuse Bin Storage. Unless I have missed some deletions, the original Justification section directly below this heading still covers building materials and photos G-H (e.g. Greenway) show not a bin store in sight and therefore do not relate specifically to the new H3 heading! Other aspects of that text do relate to bin stores, so I suspect this section needs refinement and/or moving in part to H5 as appropriate. Similarly the "What difference will it make" section no longer relates specifically to the new H3 title. The paragraph above it may also need to be revised.....	now back to 2 policies
Kelvin Brown	H5 : 6th bullet, I assume we are talking specifically about electric vehicle charging points? What happens about apartments or homes where residents are unable to park within a charging-cable's distance of their property? These would be unable to meet the "all new dwellings" criterion	amended
Kelvin Brown	10th bullet is a restatement of H3 in part and should probably be cross-referenced.	amended
Kelvin Brown	Transport:As I discussed with Norman yesterday, the SCC Highways strategy team are probably looking at the potential impacts of people continuing to work from home post-pandemic. It is probably worth plugging in to any reshaping of their planning/modelling and validating this section accordingly or at least acknowledging that the peak hour travel landscape may change as a result of the pandemic (and/or roadworks, depending on which finishes first!).	amended
Kelvin Brown	E2 : one could argue that elements of H5 are equally applicable to this policy, not just the lighting/R1 considerations	noted
Kelvin Brown	E5 : new bullet mentions dwellings, which of course could be places of employment, but I suggest that this either sits in H5 specifically for dwellings (technology is potentially an enabler of greener initiatives, e.g. smart meters) or the definition is extended to all premises including those specifically designated for employment	amended 'buildings' instead of 'dwellings'
Kelvin Brown	Recreation and Environment	
Kelvin Brown	P68 Objectives : new added bullet (#7) mentions cycles & pedestrians but in T1 we mention new paths accessible to wheelchair users - do we want to include that here too? I appreciate this may not be practical, but we could at least show we have thought about it! This is mentioned in R4 but probably worth restating in objectives.	done
Kelvin Brown	R5 : Context paragraph is broadly a restatement of paragraph added in Justification section of R3 on page 92 - do we need both?	
Kelvin Brown	General : The parishes invested in producing the great pictorial map of green spaces within the NP area with associated footpaths, which was delivered to every household. Should this be included in the NP with details of the distribution, perhaps as an appendix if the map format is not consistent with the style of other maps in the document?	added
Jon Powell	Thanks for the recent update.	

Jon Powell	My feedback would be, although you have some ideas for the open spaces.	
Jon Powell	Play parks and alike look very babyish.	
Jon Powell	Have you considered the teens, everyone moans they are on street corners and causing troubles.	work being done at Schhol Road, no amendment to NP
Jon Powell	How about skate parks, ramp, pump tracks for biking, basket ball courts, climbing walls Such as an example the pump track in North Petherton, near the football pitch /club.	School Road area will have some bike track contouring
Jon Powell	There is land behind the Jaguar Land rover garage and ATS, something there would be ideal, seems two school are sandwiched between the land and housing estates enclose it.	
Helen Newstead	It is incredibly difficult to actually find land which can be built on as an individual	Register is maintained by SWT
Helen Newstead	Most plots are either substantial and would be acquired by national building contractors or are incredibly expensive to an individual to afford	
Helen Newstead	Using us as an example, we have acquired land that is effectively agricultural land in the first instance with the hope that this can be built on. We have taken a huge risk here in the hope that we can build the home of our dreams. Most people would struggle to afford to buy land to develop their home on as land with planning is incredibly expensive	
Helen Newstead	Builders tend to have the upper hand for buying land it seems which effectively minimises/eliminates the opportunities for true self-builders. An example of this is the land at the junction of Bridgwater Road and Milton Hill. For a self-builder to have bought this they would have needed around £250k just to acquire the plot with no guarantee even of building here	
Helen Newstead	As a thought, with the Neighbourhood Plan it would be fantastic to see large developments putting land aside for self-builders at a competitive price. Using an example, we recall Grand Designs TV show having a plot of land for a number of individual self-builders to build on.	requested for MH2
Helen Newstead	Whilst a CIL helps give funds back to the community, when a building contractor undertakes a development they are still making substantial profits from the project	
Helen Newstead	A self-builder is looking to develop the home of their dreams to live in for a significant time	
Rural Solutions Landscaping	Further to the meeting on Monday, we have given this some thought, and drafted a couple of suggestions of how we think the plan could include some additions to align itself more with our joint aspirations for the Glebe Farm and Country Park project.	
Rural Solutions Landscaping	The 'Vision for the Garden Town' included a section on New Garden Neighbourhoods, and so this review has striven to ensure the West Monkton and Cheddon Fitzpaine Neighbourhood Plan remains in line with and supports the delivery of the aspirations of the Taunton Garden Town Vision.	done
Rural Solutions Landscaping	The NP area will see significant housing growth over the plan period. This is an opportunity to provide a range of property types at affordable prices with a particular emphasis to meet the housing needs of young and older people. This housing provision should include both affordable and market housing to ensure inclusive communities and allow people with local connections to return or remain as part of a growing community.	
Rural Solutions Landscaping	This objective will promote the following:	
Rural Solutions Landscaping	provision of a range of property types with a particular emphasis to meet the housing needs of young and older people;	
Rural Solutions Landscaping	an increased proportion of 1 and 2 bed dwellings to allow first time buyers and downsizers to remain in the area;	
Rural Solutions Landscaping	an increased proportion of single storey dwellings to give older residents the opportunity to downsize, thus releasing mid-range and larger properties onto the market;	
Rural Solutions Landscaping	recognition that not everyone has the ability to buy their home at current price levels on the open market. Therefore, affordable housing must be provided in accordance with relevant Core Strategy Policies and Supplementary Planning Documents adopted by TDBC;	
Rural Solutions Landscaping	the NP area includes good examples of locally distinctive design and external finishing materials which reflects the local architectural and historic heritage.	
Rural Solutions Landscaping	New residential development design and materials should continue to respect this context with the use of more traditional finishing materials on prominent buildings within the larger new residential areas planned for the NP area; and/or include innovative and new architectural ideas to reflect highly energy efficient buildings development, demonstrating that proposed buildings will have a net emission rate of zero or below.	
Rural Solutions Landscaping	In exceptional circumstances, support for proportionate new housing development across the Neighbourhood Plan area, which will help enable the delivery of wider community aspirations for example the Country Park, or public open space and accessibility improvements across the parishes, where the housing is brought forward with community support and supported by a comprehensive masterplan.	added to objectives
Rural Solutions Landscaping	Recreation and Environment Policy R2: Green Space and Wildlife	

New major* residential developments of 10 or more net additional dwellings (or if the site area is more than 0.5 hectares if dwelling numbers are yet to be agreed) must provide new green space and wildlife areas to meet local needs and/or minimise impacts on local bio-diversity, and provide net gains in biodiversity in accordance with the National Planning Policy Framework. This should be identified and evaluated through the use of Natural England’s Biodiversity Metric 2.0 and the Somerset Habitat Evaluation Procedure (where a site is found to be of local significance for the conservation of populations of important species). Net gain from development is mandatory through the Environment Bill (2019-2021). Natural England’s Biodiversity Metric 2.0 allows for local species metrics.

Access to quality and interconnected green space must be provided in all new developments because access to quality green space (not just grass fields, but higher-level habitats including trees, natural blue / green features such as ponds / bogs wet areas/species rich spaces etc) has been scientifically proven to have a number of important benefits:

- reduce stress levels and improve people’s wellbeing;
- moderate temperatures – so they can provide ‘cooling’ spaces in towns and cities during the increasing number of extreme temperature events;
- reduce air pollution - in particular – particulate PM2.5s.

In exceptional circumstances, proportionate new housing development across the Neighbourhood Plan area will be supported where this would enable the delivery of wider community aspirations for example the Country Park, or public open space and accessibility improvements, where the housing is brought forward with community support and supported by a comprehensive masterplan.

Improved habitats can provide sanctuaries and movement corridors for wildlife which are also under stress from climate change.
In particular, every opportunity will be taken to:

- Protect, maintain, link and enhance our existing green spaces, water and woodland, for people and wildlife; support for Somerset Pollinator Action Plan, whilst providing new wildlife and wildflower habitats and networks which enhance and protect local watercourses for wildlife and flood attenuation purposes;
- Protect and create hedgerows, woodlands, individual specimen trees and orchards.
- Conformity with Core Strategy & NPPF

This Policy is considered to be in general conformity with Core Strategy Policies CP8 (Environment) which seeks to conserve the natural and historic environment; DM1 (General Requirements) paragraph c which protects wildlife species and their habitats (and also SADMP Policy ENV1 (Protection of trees, woodlands, orchards and hedgerows)) and finally CS Policies SS1&2. This NP Policy is also considered to be in general conformity with the NPPF, particularly Sections 10, 11 and 12 and paragraph 73 and **78 which seeks to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.**

Introduction

- 1 Persimmon Homes and Redrow Homes are jointly developing proposals for the development of the next phase of the Monkton Heathfield major development area. The Persimmon Redrow Consortium ‘PRC’ have worked closely with the Parish Councils of West Monkton and Cheddon Fitzpaine over many years which have seen the successful delivery of 900 new market and affordable homes in the first phase of the Monkton site. Persimmon are currently developing more than 300 new homes at Hartnells Farm.
- 2 The PRC welcome the opportunity to comment on the Revised West Monkton and Cheddon Fitzpaine Neighbourhood Plan, which forms part of the Development Plan for the local area.
- 3 Whilst noting the Parish Councils desire to keep the NP up to date, it is not clear how the consultation document is to be taken forward in the context of the Regulations for Neighbourhood Plans.
- 4 National Guidance notes that there are 3 types of modification which can be made to a Neighbourhood Plan or order. The process will depend on the degree of change which the modification involves:
 - ☐ Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.
 - ☐ Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.
 - ☐ Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.
- 5 It is unclear what the scope of the revisions to the NP are intended to be. The documents should be clear in defining if the intended modifications are minor, or material.

added to objectives

added to R2 conformity

Comments 1-5.

Some shortfalls were revealed in the original NP, made in 2017; the government advised that NP’s should be revised every couple of years; Garden Town status was awarded to Taunton and consequently the Monkton Heathfield Urban Extension was referred to as a Garden community; developments such as declarations of Climate and Ecological Emergency occurred. In view of these matters it was considered necessary to do a Residents Survey in November 2019 to determine the views of the community. The results confirmed that some parts of the NP needed revision.

Rural Solutions Landscaping

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Rural Solutions Landscaping

Rural Solutions Landscaping

A Penna PRC

There appears to have been no updating of the evidence base which underpins the adopted NP, nor any updating of the text of the NP to reflect changes over time or updating of references to more recent data etc. Despite referencing the most recent NPPF, the Plan continues to reference the previous version throughout. In short, whilst a handful of policy changes are suggested, the NP has not been updated.

7 The NP revisions appear to have been made on a flawed assumption. On P8 it is noted that 'The idea of the Review was brought to the attention of both Parishes by the Chairman of the NP Delivery Group who reported in September 2018 on the proposed changes to the National Planning Policy Framework and the recommendation that Neighbourhood Plans should be reviewed every two years'.

8 There is no requirement or recommendation to review NPs every two years. National Guidance states that there is no requirement to review or update NPs except in very particular circumstances where a NP contains policies allocating land for housing, where a Plan may be considered to be 'out of date'. That is not the case with the WM&CFNP.

9 Nor have there been any changes to the other parts of the Development Plan. Whilst the District Council have begun a Review of the Local Plan, this is at very early stages and progress has been delayed as a result of proposed planning reform and potential Local Government reorganisation in Somerset.

10 Whilst the consultation document references several Garden Town documents produced by the District Council and material on Climate change, none of these are formal Development Plan Documents or new Policy. Only the District Design Guide is to be formal Supplementary Planning Guidance.

11 It is difficult to understand how much weight could be given to NP policies which have been amended to reflect District Council Guidance which does not form part of the Development Plan.

12 Further, events 'on the ground' are fast moving at present and the NP revisions could

Comment 6. There original evidence base was considered still relevant. The NPPF references have been corrected.

Comments 7,8. Recollections about the announcement of updates to Neighbourhood Plans may vary, but the response to PRC comment 1-5 indicates why a revision was necessary.

Comment 9 The revisions were discussed with Forward Planning Strategy at SWT, and an agreement was reached to go ahead, because it was agreed that if the NP revision continued to wait for the Local Plan review at SWT, the weight attributed to the NP would have diminished owing to its age.

Comment 10 noted.

Comments 11-15 advice on the phosphates issue has been sought and received and the NP amended accordingly.

15 It would seem premature at best for the NP to be being revised when the phosphates issue remains unsettled and, the implications for design of development and mitigation procedures have not been established.

16 Whilst noting the PCs desire to keep local policy up to date, the revisions fall a long way short of a comprehensive updating of the adopted NP, including its evidence base, and risk being overtaken very quickly as the District Local Plan Review moves forward and/or there are changes to the Planning system nationally.

17 The PRC would recommend that if the NP Revision is to be progressed, the evidence base which underpins the Plan should be properly and comprehensively updated, together with a detailed review of the text and policies in the NP as a whole. Failing this, the PCs should consider whether it would be more appropriate to await the review of the Development Plan as a whole and in particular to understand the implications of the phosphates issue affecting the County before progressing the Review.

Comments 16-17 The revisions to the Neighbourhood Plan as tabled are not intended to be a comprehensive updating of the entire Plan.

A Penna PRC
A Penna PRC
A Penna PRC

A Penna PRC

Comments

18 The PRC have a number of detailed comments on the NP consultation, which are set out below. The references follow the page numbering/Policy order in the document.

19 P29: New text on housing objectives. The NP should reflect that there is no requirement nationally or locally to require zero carbon/emission buildings in new development. New Homes are required to follow Building Regulations and the Future Homes Standards set by the Government. The regulations bring changes to Part L (conservation of fuel and power) and F (ventilation) of the Building Regulations to improve the energy efficiency of new homes. The new Future Homes Standard will eventually ensure that all new homes built from 2025 will produce 75-80% less carbon emissions than homes delivered under current regulations.

20 The Government will first update the Building Regulations later this year to ensure new homes built from 2022 produce 31% less carbon emissions compared to current standards. In 2023 the government will consult about technical aspects of the Future Homes Standard before updating the Regulations again to come into force in 2025.

21 This timetable reflects that technology and construction practice will need to adapt and deliver cost effective solutions which cannot happen straight away.

22 The NP should set out that development must deliver on the standards set out above as part of a managed transition towards much lower carbon emissions in new development.

23 Policy H3 Bin Storage: The proposed text is too vague to be usefully applied by developers in designing new development. The NP should refer to the relevant local design standards/guidance. It is not appropriate for the policy to refer unspecified future changes.

24 Policy H5 Building and Climate Change: This proposed new policy is fundamentally flawed. It is based on the assumption that there is new Policy from Somerset West and Taunton District Council. There is not. The District Council have made it clear that the referenced Climate Change document is not new or even interim policy. It is a statement explaining how current policy – DM5 in particular - should be applied in considering new development proposals.

25 As noted above, developers are required to adhere to Building Regulations and Future Homes Standards which will be phased in over coming years.

26 Policy H5 needs a rethink. It is too prescriptive. It should follow Development Plan policy, Building Regulations and FHS. It is suggested that rather than seek to list specific building practices, the Policy instead follows SWT Council in seeking through the validation of application process, a requirement for developers to complete a checklist demonstrating how proposals seek to meet the need to respond to Climate Change.

27 Policy T1 Footpath and Cycleway network: Whilst supporting the intent of Policy T1, the PRC consider that the requirement for all such measures to be in place prior to first occupation is unreasonable. On larger scale developments the delivery of footpath links and cycleways would be phased and delivered in line with a phasing programme to be agreed with SWT and SCC, the highway authority. T1 should be amended to recognise the need for a phased programme of delivery.

28 Map 10 and text, Employment Areas: As noted above there has been no general updating of the NP which is a significant weakness. An example is Map 10 and the text related to employment sites. The Walford Cross area is an employment land reserve in the adopted policy SS1. For the land South of Langaller, SWT have resolved to allow part of this area to be 'released' for housing development; the area is subject to detailed design guidance.

29 Policy E3 Existing Employment Areas: This policy fails to take account of the SWT Employment Land Study which found a very significant over supply of employment land in the District as a whole. The Policy also does not reflect the proactive approach to employment land sites set out in the NPPF. NPPF specifically recommends that 'Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs'. Policy E3 as proposed to be amended would be more restrictive rather than taking the positive proactive approach set out in Guidance.

30 Policy R1 Dark Skies: The proposed changes to R1 are far too detailed and substantially beyond any requirements that would be placed on development by the Local Planning Authority. The existing R1 correctly sets out that new development should be subject to a requirement to provide a lighting scheme. This is a typical condition added to planning decision notices. Given every site will be different in terms of location, building type, lighting strategy etc it is not appropriate for Policy R1 to set out specific lighting requirements. The Policy should not be amended.

31 Policy R2 Green Space and Wildlife: whilst the objectives of the ch

Comment 19- 22 -Housing Objectives text amended

Comment 23 Wording revised to ensure clarity, plus reference to the relevant local design standards/guidance as recommended by SWT which is 'Somerset Waste Partnership Guidelines for developers' , providing information on bins required and their dimensions.

Comment 24 25: The words have been changed to clarify that there is no new policy from SWT: the referenced document is a statement explaining how current policy should be applied in considering new development proposals. The policy seeks to achieve the highest possible standards from Building Regulations and Future Home Standards. Further clarification is provided in the 'What difference will it make'.

Comment 27 Policy text amended to include 'as close to first occupancy as practically possible', and further explanations given in 'Justification' and 'What difference will it make'. Changes designed to avoid failure to provide footpaths and cycleways until terminal stages of development of the site.

Comment 28. Map 10 was issued by TDBC and a request for an updated map from SWT to be substituted has been made. The date of Map 10 as currently included has been explained in more detail. More details have been added about Walford Cross, and south of Langaller employment sites.

Comment 29. Regrettably the SWT Employment Land Study is not immediately available on the SWT website. The revisions were considered necessary to protect

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31 Policy R2 Green Space and Wildlife: whilst the objectives of the changes to R2 are noted and supported, it needs to be clearer in identifying what types of development it applies to. It will be unrealistic for all new development to deliver open space and wildlife areas. The text should be adjusted accordingly.

32 Policy R3 Flood Attenuation: Much of the new text appears to be more appropriately set out as part of the explanatory text of the NP and not Policy given it simply restates other policy and guidance in national and District Plans. Further, it is unclear what the '25 year plan' referred to is?

33 This is another example of where the NP is likely to be quickly overtaken by changes to policy and approach. New guidance of SUDS in Somerset is likely to be adopted in the coming months. The NP should await these changes in SUDS guidance.

34 P115 MH1 pitches: The PRC note the desire of the PCs to change the approved senior football pitches to rugby and cricket. It remains the case however that both Sport England and the Football Association have identified there remains a current and future need for junior football pitches in the Taunton area.

35 R5 Local Green Spaces: As above, Sport England and the FA consider there is both current and future demand locally for junior football pitches.

Comment 34- 35. There have been further developments with the FA and Sport England in the project to provide rugby and cricket pitches to satisfy current needs rather than football pitches. This is supported by the Neighbourhood Plan Survey conducted in Nov 2019.

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