

Response ID ANON-8CC9-KD8V-M

Submitted to **Local Plan Issues and Options**

Submitted on **2020-03-09 21:50:27**

Your details

What is your name?

Forename:

Kate

Surname:

Jeffreys

Are you making an individual response or on behalf of an organisation?

Individual

If individual, please tell us what type:

Resident of Somerset West and Taunton

Name of organisation:

Please choose one from the drop-down list:

What is your (personal/organisational) address?

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What is your email address?

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1. Overview and objectives

Do you agree that these are the right Objectives for the Local Plan?

Disagree

Please provide reasons for your answers (200 words max):

Objective 1 should include reference to adaptation to climate change as well as reduction in greenhouse gas emissions. It is important that development control helps communities to adapt to changes in surface water flow and flooding, as well as rapidly eroding coastlines. Some areas should not now be built on.

Catchment management and sustainable coastal management approaches should be prioritised.

Objective 5 should include specific reference to blue and green infrastructure.

Objective 8 duplicates in part Objectives 3 and 4. Tourism should be included within Objective 4. Agricultural transformation is important enough to have a stand-alone element and should include reference to the delivery of public goods to support other objectives.

2. Carbon neutrality

Question 1a: Should we aim to require that all newdevelopment is 'zero carbon' by as soon as possible (e.g. by 2025) or give slightly more time (e.g. by 2030) for developers to adapt their design approaches, materials and suppliers?

As soon as possible (e.g. by 2025)

Question 1b: Should we allocate sites for specific renewable energy development or identify broad areas which we consider suitable?

Not Answered

Question 1c: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

1/C 2 is welcomed. Carbon budgets for developments should take into account whether jobs and facilities are in the area, or whether carbon emissions will arise

from travel. Limits on 2nd homes should also be considered - it is not good for the environment or communities for families to have 2 homes and to travel between the two.

1/C 3 is welcomed. Encouraging and enabling the sustainable retrofit of existing buildings and communities is important. Support for behaviour change (e.g. turn down the thermostat) can be an effective way to achieve big reductions.

1/C 5 is not welcomed. This is a retrograde measure straight from the 'NFU hymn sheet'. This measure will potentially force renewable energy schemes preferentially into areas of high wildlife conservation value. Instead, any renewable scheme should be subject to a cost/benefit analysis that takes into account ecological adverse impacts alongside impacts on agricultural production.

1/C 6 is welcomed and fits in with the need for agriculture to deliver better public goods. 1/C 5 would be in conflict with this policy.

3. Sustainable locations

Question 2a: Do you agree with the tiers that identifies Taunton followed by 6 tiers covering the other settlements?

Not Answered

If not, what changes would you make and why? (200 words max):

Question 2b: Do you think Watchet and Williton should be seen as associated settlements for the purposes of the Local Plan due to their close proximity and in complementing the services of each other (and therefore be in a higher tier to Bishops Lydeard and Wiveliscombe)?

Yes - Watchet and Williton should be seen as associated settlements

Please provide reasons for your answers (200 words max):

Each community is distinct from as well as complementary to the other. They already share services such as doctor surgeries, and community facilities and shops and should be seen as associated but different settlements, with a contrasting character and priorities.

A joint 'Parishes plan' covering both settlements should help to prevent unmanaged urban sprawl developing between the two communities and would make the most of integrated growth opportunities. This should identify significant green and blue as well as other infrastructure in a coherent overview of the areas.

Question 2c: Do you think we should carry on with the way housing is currently distributed across our area (see pie chart) or should we be doing something different, such as one of the three options suggested below?

Not Answered

Please provide reasons for your answers (200 words max):

What else do you think about housing distribution in our area?

Please provide comments (250 words max):

I strongly support the need for detailed analysis as to where homes should be built in SWT which reduce the need to travel and have other aspects of sustainability. I am unconvinced that such information as yet exists in a coherent form and feel that SWT should invest in and communicate an evidence-based approach to these issues.

Question 2d: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

4. New and affordable homes

Question 3a: Should our housing requirement figure match the Government's minimum figure of 702 dwellings per year or should we have a higher figure?

Not Answered

Please provide reasons for your answers (200 words max):

Neither option is favoured.

The housing requirement should be determined by housing needs analysis and consideration of sustainable development requirements. Requirements determined by economic growth and infrastructure improvements in isolation may well be in direct conflict with SWT's stated aim of carbon neutrality by 2030.

Question 3b: How should we proactively plan for Gypsy, Traveller and Travelling Showpeople pitches?

Require a proportion of development sites to provide an area for residential Traveller pitches; and/or, Allocate sites specifically for pitches.

Please provide reasons for your answers (200 words max):

Question 3c: Should we require that all new housing developments include a percentage of new homes that are designed to be accessible, adaptable and wheelchair accessible?

Require a proportion of dwellings to meet the category standard as set out in Building Regulations Part M.

Please provide reasons for your answers (200 words max):

I do not understand how the first option could even be legal, let alone desirable.

Question 3d: How should we provide for custom self-build plots? Should we:

Identify and allocate specific sites for self-build plots in locations related to where people want to live according to our self-build register; and/or, Include a requirement for all housing development sites over a threshold to include a proportion of plots as self-build plots; and/or, Allow self-build plots on Rural Exception sites provided that they are secured as affordable housing for ever

Please provide reasons for your answers (200 words max):

Self-build communities are great and should be included as an essential element within SWT. They can instil vitality and imagination, and help communities to achieve sustainable development. Self-build communities could be given additional benefits and incentives according to the environmental and community benefits they would offer to the localities in which plots were allocated. This would assist with integration into existing communities.

Question 3e: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

5. A prosperous economy

Question 4a: Should we ensure the growth of our local economy through an increase in the proportion of higher value jobs (with limited increase of jobs overall) or through a significant increase in the number of jobs?

Align with the Heart of the South West growth ambitions (deliver a shift towards a significant increase in overall job numbers including higher value jobs)

Please provide reasons for your answers (200 words max):

Communities require a range of jobs, not just higher value.

It should not, with Hinkley C within the District, be beyond the ambition and ability of SWT to do better than has been the case til now. Imagination, vitality, energy, a high quality environment, good schools and a vibrant arts sector will attract the businesses, young people and families to make up a dynamic economy and jobs market.

Question 4b: Should we keep all of our existing employment sites and allocations in employment use or should we allow the loss of some to other uses? How should we decide which ones to lose?

Not Answered

Please provide reasons for your answers (200 words max):

Question 4c: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

Strongly support policy 4c/4. Policy 4c/7 should target the encouragement of the digital economy, as well as creative industries and leisure.

There must also be substantial improvements to the digital infrastructure in the SWT area. You cannot change geography; you can however change connectedness. SWT must be well connected digitally in order to thrive in the 21st Century.

SWT already has the ingredients to attract digital businesses and/or workers to a relatively low-cost / high quality environment. There is considerable scope for the digital workforce to continue to grow - but businesses and highly skilled workers will only move to where excellent digital infrastructure is already present.

Policies encouraging the creative industries will also lead to economic benefits by contributing to communities in which high value workers and businesses prefer to live. There will also be a 'snow-ball' effect - bring in one or two significant players and others will follow.

Encouraging digital infrastructure, businesses and creative industries should therefore be a priority for the area. Specific policies in the new Local Plan would be helpful in this regard.

6. Infrastructure

Question 5a: On what infrastructure should we prioritise developer contributions? (Please rank in order of priority)

IO - 5a - ranking - Affordable housing:

IO - 5a - ranking - Designing for the Climate Change Emergency:

1

IO - 5a - ranking - Accessible, Adaptable and Wheelchair Accessible homes:

3

IO - 5a - ranking - Strategic Infrastructure (schools, transport, community facilities):

2

Question 5b: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

Strategic infrastructure should also include green and blue infrastructure.

Developers should be required to contribute to Nature Recovery Networks, which is part of the infrastructure required to halt and reverse the current biodiversity extinction event in the UK. This could be achieved through policies including 'Biodiversity Net Gain'.

Policy 5b/4 is welcomed and must include consideration of the added demands of surface water disposal in light of climate change.

7. Connecting people

Question 6a: How can we encourage people not to use their car when travelling into our towns for shopping and work? How can we provide more opportunities for using public transport in rural areas?

Please provide comments (200 words max):

1) Reduce the need to commute to work / shopping in the first place through favouring sustainable developments in close proximity to work locations / home working facilities.

Digital infrastructure is crucial in this regard.

2) Support for local shops and businesses to offer delivery services may be helpful.

3) Better information on public transport, and incentives for car sharing and a more imaginative definition of public transport would be helpful.

Question 6b: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

I support these objectives and warmly welcome the importance attached to this theme. The priority accorded to supporting investment in digital infrastructure is particularly welcome.

Providing leisure walking opportunities would also be important. To this end, '5/10,000 step circular footpath routes' could be created/incentivised for all communities (being located in rural areas is no guarantee of usefully accessible greenspace). Policy incentives for outdoor/indoor gyms and other leisure and recreation facilities to support smaller communities would also be welcome. Policy support for creative art, leisure and sport industries to be located closer to where people live may also help to change travel habits for good.

8. The natural and historic environment

Question 7a: Are there any specific measures that you would like to see new developments deliver to improve biodiversity locally?

Please provide comments (200 words max):

Developments aiding agricultural transformation to delivering public goods should be incentivised. The negative effects on biodiversity arising from agricultural intensification should be included alongside mention of climate change and development.

New developments should protect designated and notable sites, species and habitats. The mitigation hierarchy must be applied. Biodiversity net gain must be mandatory. (East Herts District Plan 2018 has good example policies).

Habitat connectivity (Nature Recovery Networks) must be prioritised within the Local Plan and mapped based on best available science. SWT should coordinate initiatives to enhance habitat networks using biodiversity net gain initiatives arising from new developments. These networks are most likely to work if they connect with the best areas for nature (designated sites).

'Minimising flood risk' is vague and unrealistic. Instead, communities should be supported to adapt to climate change effects. These effects include an inevitable increase in flood risk and coastal erosion pressures. New developments should include adaptations such as nature-based solutions, catchment-scale water flow management and a coordinated approach to sustainable coastal management.

Question 7b: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

Policy 7b/1 (biodiversity net gain) and can be more specific. The mitigation hierarchy should be applied with off-site net gain only considered a last resort.

Policy 7b/4 should reference statutory and non-statutory designated sites for nature and heritage conservation (rather than mentioning the Somerset Levels and Moors in isolation). Off-site developments that may affect SACs and SPAs within relevant consultation zones may require an Appropriate Assessment (not just bat and wildfowl zones ref. Policy 7b/10).

There should be specific reference to protected and notable species including those listed under section 42 of the Natural Environment and Rural Communities (NERC) Act 2006.

Policy 7b/2 is welcomed and could include specific reference to Nature Recovery Networks. Although ancient woodlands and veteran trees are valuable heritage as well as biodiversity features, trees and hedgerows may not be the top priority. Lowland meadows for example are a valuable and biodiverse habitat at risk from tree planting.

Policy 7b/3 should include specific reference to biodiversity as well as landscape value of AONBs.

Policy 7b/5 would benefit from greater focus and clarity with regard to green infrastructure.

Policy 7b/7 is similarly vague and lacking in ambition; Policy 7b/8 appears to duplicate.

Policy 7b/12 should make specific reference to the need for sites allocated for tree planting to be subject to assessment for adverse biodiversity effects.

9. Thriving coastal and rural communities

Question 8a: How should we manage development in rural areas? Should we:

Not Answered

Question 8b: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

"The natural and built environment of our rural areas adds greatly to the quality of life". The policies in this section should conserve and enhance this value.

Policy 8b/3 could include reference to the need for agricultural transformation in light of adverse effects on biodiversity resulting from current intensive agricultural practices.

Policy 8b/4 is out of date and may be in direct conflict with other policies; the relevant benefits and costs of proposals should be determined on a case by case basis. Alternatively, policies relating to the protection of areas of high wildlife and/or heritage value should also be specifically included with equal weight alongside policies relating to 'high value' agricultural land.

Policy 8b/6 and 8b/7 should be replaced with a policy setting out an integrated strategic approach to sustainable coastal management that facilitates adaptation by communities to unstable and dynamic situations. This must include protection of undeveloped coastline (in keeping with para Para 168 c of the NPPF) and the provision for infrastructure to be moved inland. In some cases existing structures will need to be abandoned, and some areas should be mapped as unsuitable for development.

10. Wellbeing of our residents

Question 9a: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

There is now substantial evidence relating to how access to nature benefits wellbeing. The Government's 25 year environment plan includes provision to make "sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing."

Policies relating to wellbeing should include specific provision to enable access to high quality green spaces that are rich in wildlife.

11. Policies for our places: Taunton

Question 10a: How do you think we could introduce more housing into Taunton Town centre?

Encouraging car-free developments (which could include allocating specific sites for car-free developments).

Please provide reasons for your answers (200 words max):

Question 10b: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

Warmly welcome policy 10b/3. Incentives for the creative industries, sport and leisure could help Taunton Town Centre become a vibrant County Town.

Warmly welcome policy 10b/10. Green and blue infrastructure are a vital component of sustainable communities. There should be links to the enhancement of ecological networks including through the use of biodiversity net gain mechanisms and the encouragement of agricultural transformation to the delivery of public benefits.

13. Policies for our places: the Coastal Strip

Question 12a: Do you have any comments on these policy approaches?

Please provide comments (250 words max):

Despite this being a section relating to the coast, there is no mention of or celebration of the very special character of the sea and coast. There should be explicit mention of the value of biodiversity and geodiversity along the coastal strip including intertidal areas. These are crucial to the tourism industry and the quality of the area as somewhere to live. These elements should be enhanced and celebrated as an integral part of sustainable coastal development.

An additional policy should be included. Proposals likely to adversely affect the character and value of the coastal strip should not be permitted. This is in keeping with changes to the National Planning Policy Framework in 2018 in relation to the value of undeveloped coastline. Specifically, Para 168 c. states that: "Planning policies and decisions should contribute to and enhance the natural and local environment by:... c) maintaining the character of the undeveloped coast, while improving public access to it'....".

The coastal strip and hinterland is very dynamic and unstable in parts. An integrated approach to development is essential, taking into account government policies relating to coastal and flood defence. This approach must include support for communities in adapting to climate change, including long-term provision for the movement of key infrastructure inland as the coast changes. Some areas of the coast are unsuitable for development and should be mapped as such within the local plan.