

From: [North Curry Parish Council](#)
To: [Strategy](#)
Subject: North Curry Parish Council
Date: 12 March 2020 13:30:30

Dear team,

Please find attached the response from our NC working group. Please acknowledge receipt of this email.

Many thanks,

Wendy

Miss W Baldwin
North Curry Parish Council Clerk

North Curry Parish Council

Consultation on **Somerset West and Taunton Local Plan Issues and Options: RESPONSE**

1. The parish council's response to this stage of the local plan consultation is to use our local experience of how planning has worked in North Curry to comment about development in rural areas generally. We are not pleading a special case for this parish but offering guidance that may apply to the whole of the new district council area.
2. We are aware of the adopted consultation response of Stoke St Mary Parish Council (another parish in the same "North Curry & Ruishton" ward as ourselves) with many of the same issues, and endorse the points they have made.

Settlement strategy

3. The 2012 Core Strategy allocated housing growth across Taunton Deane: mainly in Taunton and Wellington, but reserving some growth for the rural parts. Most growth would be on identified sites, some allocated to small windfall sites that might be brought forward by landowners or developers but had not as yet been identified. Rural development was to ensure smaller settlements did not wither away, to support and improve services and living conditions and to meet local demand.
4. The new plan will continue to focus most development at Taunton; it is suggesting a 7-tier hierarchy of centres, starting with Taunton, Wellington, Minehead and four (major) rural centres. North Curry would remain a "minor rural centre" as in the Taunton Deane Core Strategy, now to be at Tier 5, joining similar settlements in West Somerset – Kilve, Stogumber, etc. Note the disparity between the settlements identified in Tier 5. In particular and by way of example only, Creech St Michael is very different in size and profile from North Curry, and a direct comparison of the two is likely to lead to wrong conclusions being drawn about their respective ability to accommodate new development.
5. Below that, at Tier 6 would be villages such as Stoke St Gregory, Burrowbridge, Ruishton, Henlade and Hatch Beauchamp. Tier 7 would be other settlements and communities, such as Wrantage, Knapp and Durston, but not listed. ¹ This hierarchy recognises that smaller villages – like Stoke St Gregory in this ward – are struggling to keep a shop & pub and are looking for a modest increase in housing to support community facilities. More emphasis should be placed on retaining and improving facilities, public transport and infrastructure in areas where there is a deficit. Priority should be given to areas that need new homes and are in danger of losing the few facilities they have.
6. There is a need in the plan for recognition of specific issues in rural areas which can then help to form policies which apply uniquely to villages and the wider countryside. The five Taunton Deane minor rural centres together were to meet the 2012 Core Strategy requirement for a total of 250 homes by 2028. In North Curry a housing allocation of 50 homes was taken up in the first two years following adoption. Creech St Michael has taken far in excess of their notional 50. There are no more brownfield sites or industrial land in North Curry. Building in the countryside should not be excessive: using green fields reduces the incentive to use brownfield sites elsewhere in the district. The need for more affordable homes or social housing in villages is particularly important. Many young people want to live in the community where they have family links and are presently unable to do so. A policy which makes this possible would have many social

advantages, particularly in terms of keeping rural schools viable and enabling family social support within the community. As the new SW&T Council has aspirations to build Council houses, perhaps some of these could be built in existing rural settlements.

7. The plan should indicate the type of housing required as well as the number. We have a need in North Curry of smaller, affordable homes that young families can move into. **Before making changes to existing policy, the new district council should assess how successful this policy has been in their former areas.** Developers have not provided a range of housing types. Has the new housing been taken up by local families, or have they been executive homes of a size and price such that only people downsizing for retirement or long-distance commuters can afford to buy them? have community facilities been retained and improved in those centres? who now lives in the new houses? The Parish Council could undertake the work in this village, but to be meaningful, survey work would need to be undertaken District-wide, either by the individual parish councils themselves, or by the District Council.
8. Earlier Local Plans identified **settlement limits** for towns and villages in Taunton Deane, to avoid building on the outskirts. The Site Allocations and Development Management Plan allocated two sites in North Curry for housing on the edge of the village. These sites have since been included within the settlement limit as they are now developed. The draft design guide currently out to consultation points out that the prominent character of the edges of settlements (like North Curry) along the Sandstone Ridge Character Area makes them particularly sensitive to change.
9. SW&T Council explain that a Local Plan sets out how many new homes we need and where new homes and jobs will go over the next 20 years. It says how buildings should be designed. It sets out how our places will be improved and protected. There are already 14,000 new homes in the pipeline on sites with planning permission or allocated in the existing Local Plan which was prepared for the period up to 2027, plus any windfall sites that may emerge, during that time. The allocated housing is now considered to be sufficient up until the end of the proposed Local Plan period through till 2040, if present growth rates continue. If there is an upturn in growth or the Council has an aspiration for more growth then up to 5,000 additional houses may be required.

Population forecasts

10. Demographic forecasting is both about the balance of births over deaths and the net result of people moving into the area and those moving away, whether travelling on a daily basis for work or education or more permanently to live. More housing does not inevitably mean more people, but the plan needs to forecast the needs of future populations for jobs, infrastructure and community facilities.
 - a) Some households are overcrowded, some families are sharing accommodation, some housing is substandard and needs to be improved or replaced. There is a need for 1-2 bedroom starter homes (houses or flats); if developers do not have a profit incentive to provide these, we must turn to social housing providers.
 - b) The previous local plan(s) anticipated that businesses and services would be attracted to the area, creating jobs and a demand for workers and their families.

- c) People will continue to return to or settle in the area after retirement. This can be a source of volunteers, especially in the first ten to fifteen years, but as they age we have a population who will need care in later years.
11. Since the current local plans were adopted more than 50 houses have been built in North Curry. Where have the new people come from? what attracted them and what facilities are they expecting to use? It's possible that the school and health centre could expand to meet the increased demand, but there would need to be provision in the Education and Health budgets. The Local Plan can be a guide for public investment by these and other agencies for land acquisition and building cost. The Local Plan panel suggest that North Curry Parish Council takes the initiative and arranges a simple survey of the new residents at Loscombe Meadow and Lockyers Field to try to find out where they have moved from, why they were attracted to the village, if or where they work and any other information which would be likely to be useful in a wider survey which other Parishes, or preferable the SW&T Council, should conduct and be useful in the preparation of the new Local Plan. If this initiative is successful, then the info gathered could be used to lobby SW&T to carry out a wider survey.
12. Topic Paper 1 in the Local Plan evidence base sets out current population estimates for each of the district's settlements, using lower-level super output areas (LSOAs). Some of these estimates (including those for North Curry) are acknowledged to be "poor". This is not good enough. We calculate that using LSOAs doubles the true starting population of North Curry village². The addition of 50 houses has had a greater impact on a population of 900 than it would have had on one of 1,800.
13. The evidence base underpinning the new plan should provide estimates of the present population of the towns and rural centres and **forecast the likely future population** resulting from site allocations. This will provide a sound basis for assigning Community Infrastructure Levy to meet local needs.

Economic aspirations

14. The council wants to attract new businesses to the area. Council officers told us that employers are using workspace more efficiently and so increased employment need not mean an increase in workspace. Some farms are becoming industrial estates, and jobs are not restricted to offices and workshops. The tendency for redundant farm buildings and yards to be used for either residential accommodation or employment uses should be fully recognised in the new Local Plan so that some account of the impact of these can be made. These can sometimes be very significant, especially as various changes have been made to planning legislation in recent years to encourage redevelopment of farm buildings. Just about any land use will generate employment: hospitals, shops, hotels & restaurants. Even housing will have people working from home. There may be a demand for industrial sites and workshops, but this is not where the majority of employment is located in the Taunton area. Where new sites have been allocated for employment uses in local plans these should not subsequently be changed to housing use.
15. Overall there has been little increase in employment in recent years, and employment growth has not kept pace with housebuilding. Between 2015 and 2018 employment in Somerset West and Taunton³ increased by only 2,000 employee jobs to 68,000 or 3.0%, not dissimilar to the 3.6% increase in Great Britain over those years. So, what is the

council's forecast for employment? It appears to be superfluous to provide for an additional 5,000 homes across the district, on top of the alleged demographic demand of 14,000, to cater for an industrial demand that is unlikely to materialise. The district council should commission a survey to discover what proportion of employment is being provided in refurbished buildings, and where people who live in the new houses work. The 2021 Census will provide some answers, but we need answers in the next three to four months to inform the next stage of plan making. The survey work we are proposing should be linked to that proposed in paragraphs 7 and 11. There should be a recognition that if it is to be sustainable the Plan must balance housing and employment needs, which are inextricably linked. It should also be noted, however, that we are sceptical whether the information required would be sufficiently robust if the currently proposed timescale for production of the draft Local Plan is maintained. Nonetheless, the District Council needs to acknowledge that, if insufficient time is given for the work to be completed, it is unlikely that it will be fit for purpose.

16. SW&T Council needs to ensure the issue of **infrastructure** is properly reflected on in advance of consideration of where development is to take place. Taking the case of North Curry as an example, the village hall, medical centre and the school are functioning at full capacity, with little room on site to expand. Three classes at the school are occupying temporary wooden classrooms which are old and sub-standard. Planning policies and use of CIL should ensure that village schools are developed and maintained to an acceptable standard for pupils from existing and new homes. What evidence have the education and health authorities given of the ability of existing facilities to meet current and projected demand, and what scope is there for expansion or replacement? The demands on developers to make an adequate contribution to the common good from their profit margins should be fully exploited.

Our environment

17. **Flooding** is a major concern for North Curry, sitting on a ridge above the Somerset Levels. The flooding problem in North Curry is of two types. In the levels on either side of North Curry ridge the extensive, deep and sometimes lengthy flooding is a result of runoff from the very large catchments of the Rivers Tone and Parrett, both of which are tidal and for long periods unable to convey flood water to the sea. When runoff exceeds the ability of the rivers to take it away the flood water spills over into the adjacent moors, a system which has operated for a very long time. The main problem which this causes is closure of access roads to local villages. The second type of problem is flooding on the ridge is caused by runoff from fields and from the increasing area of hard surfacing associated with both new and older housing. The roads tend to act as a route for flood water to accumulate in low spots and this can in some cases flood houses or make roads temporarily impassable. The increasing area of arable land and particularly the growth of maize crops to feed indoor cattle is a significant contributory factor both on the North Curry ridge and throughout the whole catchment. Concrete and tarmac on roads and footpaths, paved gardens and run-off from the roofs of houses and garages all reduce the capacity to absorb water and hold back flash flooding caused by torrential downpours. A housebuilding design guide should advise developers on the permitted maximum percentage of impervious surfaces on new housing estates and encourage provision of water butts to reuse water in dry spells.

18. North Curry, like many parts of Taunton Vale, was characterised by **orchards**, which helped to retain floodwaters. The remaining orchards should be protected from development and encouragement given to restoring them, to preserve the heritage of the area. For the same reason, tree planting should be encouraged upstream of the settlements identified for further development.

Additional issues raised by the Stoke St Mary response

19. The use of timber construction locks up carbon for longer than other uses of wood - typically 60 to 100 years, as compared with fencing (15 years maximum) - before the carbon is returned to the environment. Wood stoves release carbon immediately into the atmosphere.
20. Having said that, housebuilding is extremely carbon-hungry. The council should encourage the provision of trees, water butts and solar panels, but planting on-site and solar roof panels would mitigate only a very small proportion of the carbon impact.
21. The housing targets imposed on the district by central Government are not justified by population projections and should be resisted or treated as maxima. The District Council do not appear to have converted twenty-year population projections into households. Even with a high rate of new household formation to relieve overcrowding, multi-family households and family breakup, 15,000 extra people don't need 14,000 extra homes.
22. The employment aspirations are unrealistic. Employment sites allocated in the Taunton Deane local plan have not been taken up. We have alluded to this at paragraph 15.
23. The landscape and quality of the villages define the character of the District much more than do Taunton, Wellington or Minehead.
24. Taunton has natural advantages as an employment centre including immediate access to the M5 motorway (unlike Bristol) and a direct main line rail link to Paddington.
25. Need to enhance public transport including re-establishing the local rail network and improving rural bus services.

Parish Council's additional response to the consultation questionnaire (paper version)

- q3. The answer should be driven by the results of the survey we propose should be undertaken, as referred to above. Without this information – and we can't imagine how the District Council expected visitors to the exhibition could possibly know without it – we would be engaging in a speculative exercise which had no evidence to support it.
- q5. The obvious answer is to tick Box 1; the alternative would be to build where homes are not needed! Or are we missing some subtlety in the question?
- q7. Again, the answer should be driven by the results of the survey work undertaken. See comment in paragraphs 7, 11 and 15 above.
- q8. We know that the Cranbrook Masterplan Examination in Public has been put on hold because the District Council did not publish the list of potential gypsy and traveller sites it considered might be suitable before selecting one as its preferred option. The Inspector has instructed the District Council to publish the list before the EiP is resumed, so that the matter can then be discussed. What is crucial in East Devon - and will be equally so in Somerset West & Taunton - is to establish the demand. Has the District

Council done the necessary work? Until it has done so and has shared the relevant information, it is impossible to make a valid response to the questions posed.

q9. Our order of preference would be:

- (i) schools, sustainable transport and community facilities
- (ii) designing for climate emergency
- (iii) affordable housing
- (iv) accessible, adaptable wheelchair accessible homes

q10. We have touched on this in our comments at paragraph 8. Settlement boundaries are usually based on some form of physical structure, e.g. a highway. We should resist a return to the “bad old days” of ribbon development which often results in a sprawl whose boundaries remain undefined. If “more remote areas” need additional development, then change the boundaries. If not, it’s not sustainable development. It’s just bad land use planning. We support the use of settlement boundaries throughout the whole SW&T District.

12 March 2020

End notes

¹ Note that Lyng Parish including the settlements of East and West Lyng, with which North Curry has close relations, is in Sedgemoor District.

² The difficulty appears to be caused by the imprecision of the statistical areas used in the estimates. The plan relates to **settlements**, not parishes; the estimates are for lower-tier super output areas (LSOAs). Topic Paper 1 acknowledges that reliable estimates of settlements with[in] large LSOAs cannot be made at the current time. However, the LSOAs are amalgamations of much smaller statistical output areas (OAs), for which 2011 Census figures, later population estimates and future projections are available. 2011 Census counts are even available for unit postcode areas within these OAs.

Of course, when rolling forward from census counts, estimates (still more, projections) depend on generalised assumptions about population trends, and the more precisely an area is defined the less accurate the estimates for it will be. However, we (and you) can do better.

North Curry sits within Taunton Deane 005A LSOA which has a 2017 population estimate of 1,804, based on a 2011 Census count of 1,776. This LSOA consists of seven OAs and comprises North Curry parish plus Durston. Three of these OAs define North Curry village: E00149126 (the village core) 338 in the 2011 Census; E00149125 (Lodwells Orchard, Longs Field) 272 in the Census; and E00149124 (Overlands, Town Close) 316. These counts aggregates to 926 for the village: 52% of the LSOA count.

This exercise shows that population estimates can be made for settlements. But in association with Ordnance Survey, ONS have made estimates for “built-up areas” that correspond closely to Local Plan settlements. The 2011 Census population of North Curry BUA is also given as 926. The work has been done for us.

Note that all these figures are unrounded to avoid accumulating errors; they cannot be accurate to this degree of precision. Moreover, various tables for the 2011 Census are slightly distorted to avoid breaching confidentiality by potentially identifying individuals. However, the general principle is demonstrated that BUAs can be used to give reliable census counts for the settlements, and should be used as a starting point to estimate future population sizes.

³ Employment figures include the National Park part of SW&T but exclude farm-based agricultural employment.

Source: ONS Business Register and Employment Survey, via NOMIS - [Open Government Licence](#) (OGL) and [UK Government Licensing Framework](#).

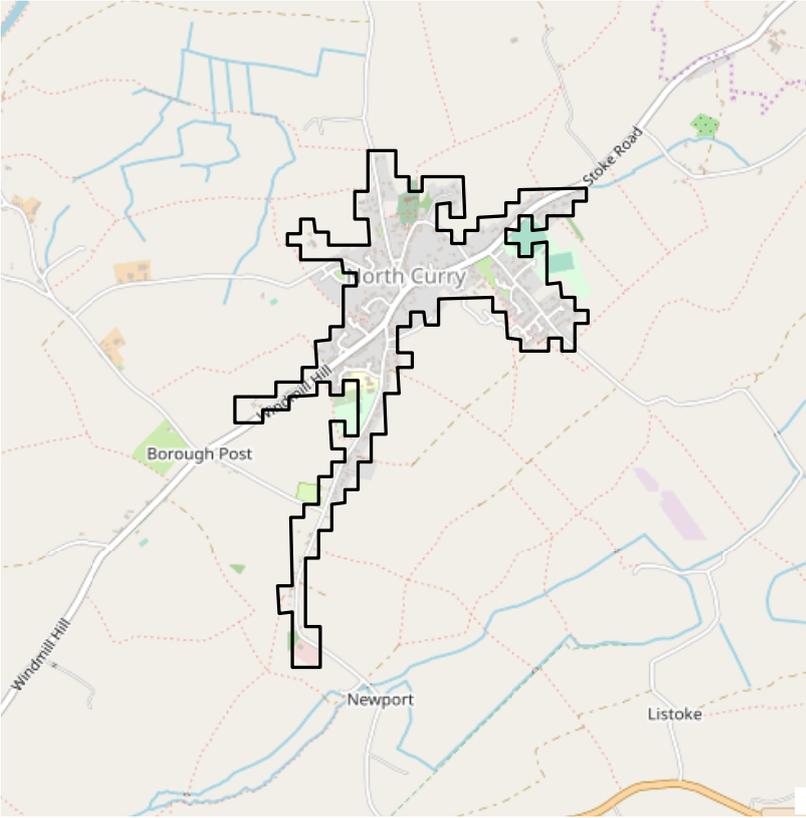
Select Built-Up Area

Tools
Choose a different type of a
List areas within
To see a map of an area (if

Selection of areas

- Abbots Leigh BUA
- Abbotsbury BUA
- Abbotskerswell BUA
- Acton Turville BUA
- Aldbourne BUA
- Alderbury BUA
- Alderholt BUA
- Alderton (Tewkesbury) BUA
- Alexandra Park BUA
- All Cannings BUA
- Alveston BUA

Map of North Curry BUA Close



North Curry Parish Council

Consultation on **Somerset West and Taunton Local Plan Issues and Options: BACKGROUND**

1. The parish council's response to this stage of the local plan consultation is to use our local experience of how planning has worked in North Curry to comment about development in rural areas generally. We are not pleading a special case for this parish but offering guidance that may apply to the whole of the new district council area. At their meeting on 11th March the Parish Council considered the report of the advisory panel, heard about the Stoke St Mary response and made additional comments. They adopted the report, with requested comments and additions as North Curry's response to the consultation.
2. The Parish Council also endorse the consultation response of Stoke St Mary Parish Council, another parish in the same "North Curry & Ruishton" ward as ourselves with many of the same issues, which we have drawn out at the end of our response.
3. Somerset West and Taunton Council are consulting on issues and objectives to be addressed in their new Local Plan. This is in preparation for a draft plan to be published after the summer. Once adopted, planning applications will be determined in accordance with the district-wide Local Plan, unless other material considerations indicate otherwise. It will set out the vision and economic, social and environmental objectives to guide and control new development up to 2040. The new district-wide Local Plan will provide for the required levels of housing, employment, infrastructure and other forms of development to support people and jobs and determine the appropriate distribution of development across the District's settlements. The new Local Plan will set out clear policies to ensure the objectives of the plan are achieved, including Development Management Policies and if required, allocating strategic sites in sustainable locations.
4. The Parish Council reserved slots on the agenda for meetings on 12th February and 11th March, and at the first of these re-established a local planning advisory panel of council members and other advisers to work on the plans and make recommendations about how the council might respond. The panel reported to the March parish council meeting, when further comments were made and the report adopted for submission.
5. It is important for any parish council concerns to be raised now, as it is difficult to shift planning policies at later stages of the plan making process and almost impossible when applications come forward for planning permission. This briefing note identifies some of the issues the parish council may wish to raise with the District.
6. Consultation opened on 13th January and closes Monday 16th March, an exceptionally extended consultation period that covers two cycles of Parish Council meetings. There were public exhibitions in Taunton on 6th and 26th February. When they visited, panel members expressed appreciation for the extension from the usual six weeks.
7. Currently, planning applications are assessed against local plans adopted separately by Taunton Deane and West Somerset councils. The new plan will cover the whole of the new council area with the exception of Exmoor National Park, which extends into Devon and has its own planning authority. The present stage identifies objectives and social, environmental and economic issues to be addressed in the Local Plan and reasonable options for policies and proposals over the next twenty years.

8. The district council are concurrently consulting on a Local Development Order and design code to enable delivery of small scale office, research and light industrial units (Use Class B1) supporting local businesses in rural areas outside of conservation areas and flood plains, on sustainability issues tackling the climate emergency, on a design guide to protect the character and appearance of the area, and on the county council's ideas about establishing a unitary authority to replace the separate councils. The Panel has not addressed these other documents.
9. This Issues and Options stage is the first of several stages towards adoption of the local plan. At the exhibitions, planning staff listened courteously and attentively to panel members and responded with detailed answers, though this is no substitute for local visits. The Parish Council have already noted that the district council acknowledges them as a statutory consultee for plan making and development management; the district has welcomed the Parish Council's intention to respond to consultations on planning and other proposals that affect North Curry, and our offer - where major changes are proposed - to provide facilities for exhibitions, meetings and visits by Members and Officers of the District Council to ensure councillors and parishioners are fully informed and involved. We can ensure the Village Hall is made available for future rounds of consultation.
10. The council for a new area has to adopt a local plan within five years from being set up. But even without a new council and a new administration, it would be necessary to have a new plan that harmonised policies across the new area. Moreover, Taunton Deane Core Strategy was adopted in 2012, before figures from the 2011 Census were available. That plan was based on an assumption that identified employment sites would create new jobs and a demand for a workforce that would need new housing. Taunton is self-contained, with relatively little commuting outside the area. However, housebuilding has gone ahead of the expected employment. This apparent imbalance of provision between housing and employment is something that needs to be tested in the evidence base and, if so, corrected in the new plan. Otherwise, planned improvements in road and rail communication may result in less self-containment of workforce and employment, with an increase in outward commuting to Exeter, Bristol and beyond.
11. The current planning framework no longer sets local plans within a regional or county context, or even an overall strategy for the council's area. In a previous consultation we noted our expectation for SW&T council to prepare a revised Core Strategy covering its wider area, taking account of the results from the 2011 Census, proposals for realigning and improving the A358, and the balance to be struck between site allocations for housing and employment. However, the Core Strategy will not be replaced, and county structure plans and regional strategies are no more: the contextual framework has been replaced by the National Planning Policy Framework, and it rests on the local plan to express any local distinctiveness from the national picture.
12. The SW&T Local Development Scheme adopted in July 2019 indicates that Taunton Deane Core Strategy for now remains a constituent part of the Development Plan but will be replaced by the district-wide local plan for Somerset West and Taunton. The Site Allocations and Development Management Plan adopted in 2016 will also be replaced by the new plan, as will relevant remaining saved policies of the 2004 Taunton Deane Local Plan.

12 March 2020