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To: [Strategy](#)
Cc: [Mineral and Waste](#); [Paul Hickson](#); [Mike O'Dowd-Jones](#)
Subject: SCC response to the SW&T I&O consultation
Date: 16 March 2020 16:27:58

Dear Colleagues

I am writing to you, with the formal SCC consultation response to the current Issues and Options document and in response to your letter of 13 Jan concerning our Duty to Cooperate.

I also attach in full, the comments made by my colleague in Public Health, although these have been amended within the formal SCC response to the consultation.

If any of the comments, recommendations or observations within this response are unclear in any way, please do not hesitate to let us know and we would be happy to work with you to clarify.

Kind regards

Helen

Helen Vittery
Service Manager – Planning and Development

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Issue from Local Plan	Page and Ref	Comments/ Recommendations (Education /Estates Response)
Infrastructure	Page 9	<p>“... Developers must give money or buildings to ease this pressure. But we cannot ask for too much or homes will not get built ...”</p> <p>SCC has concern at the wording proposed and would encourage an amendment to reflect the need to secure appropriate and necessary infrastructure. Each development should be required to secure sufficient funding/or to deliver the essential infrastructure for schools and early years provision, that it will generate.</p> <p>New housing without the appropriate infrastructure (roads & education) is not a sustainable approach for the future and will not deliver high quality communities. SCC would request that SWT consider identifying the necessary funding as part of this process, to ensure transparency in the costs that should be secured.</p> <p>This approach is supported by government guidance: https://www.gov.uk/guidance/viability#viability-and-plan-making</p> <p>Paragraph: 002 Reference ID: 10-002-20190509 of this document (supported by NPPF para 34) states</p> <p>“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”</p> <p>and SCC would ask that this is given appropriate consideration through this plan making process.</p>

Section 4: Objectives	Pg 12	<p>Objective 5 – agree and support this objective as SCC consider Education an Essential part of the infrastructure required.</p> <p>Objective 6 – agree as this supports the Education Authority policy for local schools & early years provision for local people, which enables walking/cycling to school.</p> <p>Objective 9 – agree as the '<i>inclusivity & a reduction in inequalities</i>' also reflects the Education Authority policy to have good schools and early years provision in all areas.</p>
5.5 Infrastructure Objective 5 – to ensure that new development is supported by essential infrastructure in a timely manner	Pg 30 5.5.1 Issue Deciding on our Priorities for developer contributions	<p>"... Our policies should be clear so that developers do not pay too much for a piece of land, then calculate that they cannot afford to meet our policy requirements ..."</p> <p>SCC agree with the sentiment of this statement, but have concerns at the following which states:</p> <p>"... All policy requirements are important but no requirement can be too high that it makes development unviable..."</p> <p>SCC has a concern that this wording could seek to limit what is requested for infrastructure provision through the planning process. School and early years places should be considered essential infrastructure, and all parties should seek the most cost-effective solution possible.</p> <p>SCC would ask that this wording is reviewed to reflect that the cost of school and early years provision will be secured to support the development proposed.</p> <p>SCC will commit to working with SW & T to supply the estimated costs of school and early years builds through the plan period, so that all policies can accommodate the potential education costs at an appropriate point in the process.</p> <p>It is hoped that this approach will enable an accurate Plan led viability assessment to support policies and ensure that all essential infrastructure (including education) can be accounted for.</p>

		<p>This approach will support the suggested text "...so that developers do not pay too much for a piece of land..." but rather they are able to meet the required (education) infrastructure funding and still have a viable development.</p>
	<p>Pg 31 - Option 5a: deciding on our Priorities for developer contributions</p>	<p>SCC believes that this question is ambiguous. Shouldn't the goal for building better places, be to achieve the required affordable housing with high design standards and the required infrastructure requirements? Is prioritising one over the other appropriate?</p> <p>SCC is concerned that accepting reduced design standards would not achieve other carbon/environmental priorities & objectives. Reducing infrastructure requirements would not deliver (or maintain) sustainable communities or developments and SCC would therefore request that SW&T consider a third option. It is recommended that this option could be 'provide a balance between achieving the required levels of affordable housing; with the required infrastructure to support it, all designed to the highest standards achievable'. This would seem to better accord with the Viability Guidance (referenced above) and its aims, whilst not compromising sustainable development and may assist in ensuring that policies are realistic and achievable.</p> <p>The delivery of school places and early years provision is a statutory requirement and SCC believe that this must be considered essential infrastructure for sustainable development. The full cost of meeting the demand for school places and early years provision from new developments should be met through developer contributions as per DfE guidance and in accordance with the legislation in the Childcare Acts 2006 and 2016:</p> <p>https://www.legislation.gov.uk/ukpga/2006/21/contents https://www.legislation.gov.uk/ukpga/2016/5/enacted https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</p>
	<p>Question 5b</p>	<p>Support Policy approaches 1-4</p>

Issue from Local Plan	Page and Ref	Comments/ Recommendations (Heritage response)	
The natural and historic environment	Page 36 7b/11	<p>The policy currently states:</p> <p>“Require evaluation of the archaeological value of sites where development affects a site of archaeological importance or an Area of High Archaeological Potential.”</p> <p>SCC requests that the following should be added to the end of the policy:</p> <p>“and other sites where there is a potential for archaeological remains”</p> <p>This would ensure that currently undiscovered archaeological sites will be investigated where evidence shows the potential for significant buried remains.</p>	
The natural and historic environment	35 5.7.4	<p>SCC suggests that a short paragraph on buried archaeological heritage assets could be added to this section, that refers to the Historic Environment Record and describes how previously unknown archaeological sites are discovered through development proposals.</p> <p>This would then link to the Policy requirement for archaeological evaluation.</p>	
Issue from Local Plan	Page and Ref	Comments/ Recommendations (Highways and Transport)	
Obj-1 Carbon Neutrality	Pg16	<p>SCC supports the overall approach to Carbon Neutrality but would recommend that SW&T consider adopting a quantified approach to defining a carbon budget for the area and establishing the necessary measures to achieve carbon reduction in line with necessary Government targets for net-zero emissions</p>	

<p>1c/2 Require the integration of sustainable, adaptable and resilient design into new developments to ensure they are future-proofed, requiring developers to fully provide cabling ready for use for the installation of electric vehicle charging or access to electric vehicle charging points in all new residential parking spaces.</p>	<p>Pg 16</p>	<p>SCC support this approach and would suggest that reference is made to the SCC Travel Plan Guidance, where this is already a Policy requirement. SCC would also recommend discussion be progressed regarding how charging points can be provided within the Public Highway.</p>
<p>Obj-2 Sustainable Locations</p>	<p>Pg18</p>	<p>SCC do not feel it is appropriate to comment on specific Towns at this stage and will make full comment when the Site Allocation Documents are published later in the year.</p> <p>When considering tier allocation for locations it is highly recommended that a strategic traffic model should be investigated to ensure appropriate levels of sustainable development and identify critical mitigation that may be required. SW&T should prepare an appropriate evidence base to assess the traffic impact of its development plan, including such matters as the impact on traffic levels and congestion, realistic opportunity to transfer car trips to walking, cycling and public transport and the scale of investment necessary from developer contributions towards alternative measures needed to achieve proposed levels of transfer to sustainable modes.</p>
<p>Question 2b? – Do you think Watchet and Williton should be seen as associated settlements for purpose of</p>	<p>Pg21</p>	<p>Initial transport assessments have indicated that large amounts of development would have significant impact on the current road network infrastructure and therefore SCC does not support Watchet and Williton being seen as associated settlements.</p>

Local Plan and become a higher settlement tier higher than Bishops Lydeard and Wiveliscombe?		It is highly recommended that full traffic modelling is commissioned to identify the likely impacts that could require mitigation in this area.
Option 2c (iii) Whether Taunton's highway network (even with a major shift in travel behaviour to public transport, walking and cycling) is a constraint to new large scale housing development;	Pg21	<p>SCC cannot comment in general terms regarding the network being a constraint on large scale housing development in Taunton.</p> <p>It is recommended that traffic modelling work is undertaken prior to the allocation of any large housing developments, so that network constraints are identified and understood in advance. Planning applications should be accompanied by full traffic modelling within transport assessments, to identify and propose mitigation for their individual and combined impact on the network.</p>
Option 2c (vi) Whether settlements closer to the M5 corridor should have a higher proportion of development (than those closer to the coast) due to their higher land values and ability to deliver new housing	Pg21	This seems to make sense in principle. Any development proposal should be accompanied by full traffic modelling within transport assessments, to identify and propose mitigation for their individual and combined impact on the network.
2b/1 Ensure development proposals demonstrate how they will reduce the need to travel through their location, design and infrastructure and	Pg22	SCC supports this policy intention and would recommend that there is a reference to the use of Travel Plans, as SCC Policy and NPPF.

where appropriate, providing a mix of uses		
2b/2 Making the most effective and efficient use of land, giving preference to the recycling of previously developed land where this aligns with the settlement strategy and other policies	Pg22	SCC supports this policy intention and that all avenues are explored to bring forward appropriate development prior to developing greenfield sites.
2b/4 Support for small sites that are in line with the settlement strategy and other policies and encouragement for Neighbourhood Plans to allocate small sites	Pg22	SCC agrees in principle but recommends that this should be undertaken in liaison with appropriate Authorities.
Objective 5 – Infrastructure Deciding on priorities for developer contributions.	Pg31	When deciding on priorities for developer contributions, SCC would support strategic infrastructure as a priority.
Policy approaches to meet Obj 5: 5b/2 Set out the approach to infrastructure provision via S106 or CIL	Pg31	SCC believes that the policy approach 5b/2 would be beneficial, but that SW&T should consider developing a clear funding plan for how new development will be able to pay for the essential highways and transport infrastructure required to enable the development to come forward.

Objective 6 – major travel change towards walking, cycling and public transport to reduce the need to travel.	Pg32	SCC strongly supports the aim of Objective 6.
6b/1 New developments to be designed in line with Sport England’s active design guidelines so that walking and cycling networks permeate through developments in a safe and convenient way.	Pg32	SCC supports the use of active travel design guidelines and recommends consideration of the Local Transport Note 2 when it is published (expected March 2020) or any policy that SCC develops in response to its work on the Local Cycling and Walking Infrastructure Plans.
6b/2 Seek S106 contributions to develop new or enhance bus routes; developers to liaise with bus operators on highway design that facilitates new bus routes.	Pg32	SCC agrees with this in principle but suggests that there is consideration given to the long-term financial implications. An appropriate level of contribution must be secured to ensure the longevity of such services.
6b/3 Policy detail to guide development for car and cycle parking standards; Travel Plans; Transport Assessments; protection and	Pg32	When developing policy detail please ensure that they are in line with SCC policies such as (but not limited to) the Local Transport Plan, Somerset Parking Strategy, Travel Plan Guidance, Rail Strategy and the Enabling Growth project.

restoration of disused railway and canal corridors.		
Objective 9 Wellbeing of our Residents 9a/3 Allow flexibility in the design of the highway and public realm to achieve high quality design that maximises accessibility by those who are less mobile and prioritises accessibility by walking, cycling and public transport over the car.		Pg39 SCC supports innovative design to meet the needs of its residents. Any flexibility in design must however, still meet all Highway statutory requirements such as Safety Audits etc. especially if there is a requirement for adoption by the Highway Authority.
9a/5 Ensure that air quality, pollution, contaminated land, noise, nuisance, smell, land instability are considerations for planning applications.		Pg39 SCC supports this policy.
Issue from Local Plan	Page and Ref	Comments/ Recommendations (Public Health)
Strategies	5	It is requested that the Joint Strategic Needs Assessment, and the Somerset Health and Wellbeing Strategy (Improving Lives) that arises from it, as well as the Local Cycling and Walking Infrastructure Plan (LCWIP) for Taunton (currently in draft), form part of the evidence base, informing this plan and are clearly referenced within it.

Carbon Neutrality	14 Objective 1	<p>Global heating represents the single greatest threat to public health this century at the planetary scale, so we strongly support the emphasis on seeking to achieve net zero by 2030 in Objective 1, whilst recognising the scale of the challenge involved.</p> <p>It is imperative that rapid decarbonisation takes place throughout this decade, so aiming for 2030, even if this is not achieved in reality, is essential. A much later target date would risk losing the sense of urgency that this planetary emergency necessitates.</p>
	1a	We would favour the earlier date of 2025. This is not a situation where new technologies are required to be developed, merely the application of existing technologies at scale and pace. While outside the scope of the local plan, we would also emphasise the need for stronger building regulation to ensure that completed buildings meet energy performance standards in reality.
	1c	In relation to Policy 1C/2, there is a need to consider the extent to which vehicle charging should be provided. If there is a move towards car clubs and mobility as a service (MAAS), possibly autonomous vehicles, then it may be necessary to require chargers for such vehicles. SCC would recommend that measures are put in place to ensure there is not an undersupply of 'shared chargers'. It is also recommended that consideration is given to the wording of this policy to ensure it is future proofed, to allow for potential changes in vehicle ownership and usage. There is also a need to ensure that chargers on the highway are positioned so as not to impinge on footways and cycleways i.e. they should be intrinsic to parking bays.
Sustainable Locations	17 Objective 2	We strongly support the broad thrust of this section and in particular, <i>"New development should put people rather than vehicles at its heart. It should facilitate easy access to day-to-day services and be designed to prioritise walking, cycling, and the use of public transport to provide real choices for everyone. Development in sustainable locations drives up the viability of public</i>

		<i>transport services to those locations, creating the opportunity to further improve services and living conditions. Transport considerations need to be fundamental to the Local Plan process and not retrofitted later...</i>
	2d	The issue of housing provision outside of Taunton and Wellington must be informed by the social viability of settlements having regard to the aging demographics, especially in West Somerset, so that both public and private services are sustainable. In particular the need for genuinely affordable housing to rent is crucial to allowing young adults and essential workers to make their homes in those communities where house prices are beyond the reach of first-time buyers.
	2b/1, 2b/2 and 2b/3. 2b4	We strongly support policies 2b/1, 2b/2 and 2b/3. In relation to policy 2b/4, is there scope to amend it to address the issues outlined in the paragraph above? There is also potential to consider the scope for multi-use developments, such as primary school, residential care home and rental apartments for teaching and care staff on a single site, to facilitate inter-generational support and affordable housing to rent, and a policy explicitly welcoming such approaches might be helpful in encouraging developers and public services to bring forward proposals.
New and affordable homes	Page 23 Objective 3 question 3a	we support option (ii). The changing nature of our population demographics means we will need more homes that are accessible, so it is important that developments include such provision.
	question 3c	This should be informed by the GTAA currently being undertaken by the Joint Somerset Planning Authorities

	question 3e	we support all the proposed policies. We strongly support proposed policy 3e/4, so that housing provision by settlement is based on need, rather than speculative market development, and agree that a SPD or TAN is appropriate to set out the detail, providing sufficient flexibility to respond to changing market and national housing policy and finance conditions.
	policy 3e/6	<p>We also strongly support minimum space standards in proposed policy 3e/6. We already see in some permitted development applications accommodation which falls short of minimum space standards, both in general and in relation to bedroom size. Minimum space standards set a decent basic standard, and it is not appropriate to permit unconstrained market forces to undercut such standards to the detriment of physical and mental health. There is considerable evidence of the impacts of inadequate space on families in terms of overcrowding, inability to eat around a dining table, lack of privacy, lack of space for homework, and insufficient space to entertain guests. Such issues can have detrimental effects on family life, including on mental health, and educational achievement.</p> <p>We would also recommend consideration of an additional policy in relation to affordable housing. Such housing is often located on the least desirable part of a plot in a block and is clearly and obviously affordable housing. We would advocate a tenure-blind approach, so that it is not apparent from the outside whether a property is affordable or otherwise. Properties should be distributed throughout a development, not concentrated in one area.</p>
A prosperous economy	Page 27 – Objective 4	We wish to emphasise that a healthy population is a key contributor to a healthy and prosperous economy. Conversely a population that has high levels of illness, including long-term conditions such as type 2 diabetes arising primarily from obesity, cannot achieve its economic potential. Somerset has high levels of adult obesity and rapidly rising incidence of type 2

		<p>diabetes. Investment in measures to improve population health, including public policies that support healthy and active environments, is therefore essential to improving productivity and economic wellbeing. Given the constrained supply of labour in this county, maximising the health of the population, both of working age and the retired, is crucial to sustainability.</p>
	question 4b	<p>we would urge that employment sites which are well served by rail and bus should be retained, in order to assist with modal shift and support the climate agenda. Employment uses that could and should be within towns should not be permitted on land that is in reality highly car dependent. Such car dependent locations discriminate against those without use of a car and tend to increase long-distance car commuting along the motorway/A303 that is not compatible with the climate emergency.</p>
Infrastructure	Page 30 Objective 5	<p>We welcome the viability assessment of this plan. We note that affordable housing is the largest impact on viability, but also wish to highlight the significant impact that provision for cars has on viability, in terms of land take for roads and especially parking. In this respect there is an opportunity to consider parking standards in the context of climate change.</p>
	question 5a	<p>The climate emergency should be prioritised, BUT we consider that national policy and regulations on minimum energy standards should drive this rather than local planning policy. We also tend to agree that the lower running costs of highly energy efficient housing will attract a higher market price. Therefore, we would recommend you allow for flexibility to respond to changing national policy in allocating developer contributions.</p> <p>To recognise the changing priority from car travel and to reflect the climate emergency, you may wish to consider a SPD or TAN on transport mitigation, so that the current emphasis on predict and provide for car traffic is balanced. These publications of Transport for New Homes</p>

		(specifically the Checklist for New Housing Developments), and the recent CIHT publication, " Better planning, better transport, better places " may be of use. The latter document in particular provides something of a roadmap to using the full scope of the NPPF to enable modes other than the car.
Connecting People	Page 32 – Objective 6	<p>The "Movement" section refers to the need to encourage people to walk and cycle, but the evidence clearly shows that encouragement is not what is needed. Encouragement cannot overcome fear! The major barrier to increased walking and especially cycling is the perception that it is simply unsafe to do so, due primarily to motor traffic: speed, volume, pavement parking etc. What is required is not encouragement but enabling measures so that people feel safe to cycle and walk, and that largely involves not mixing with high volume motor traffic or at speeds over 20mph.</p> <p>With respect to bus services we recognise that there are limits to the role of planning in the absence of bus regulation. Nevertheless, it would be helpful to set out desirable minimum service standards as an aspirational target on what level and frequency of bus service should be available to communities of various sizes and/or on main corridors.</p> <p>Once standards are set it should then become possible for transport assessments and travel plans to consider how developments might contribute to the development of bus services aimed at meeting those standards, even if incrementally.</p>
	question 6a	the question of car parking at both origin and destination is important, as well as park and ride in the case of Taunton. Generous parking provision on housing developments both enables multi-car households and makes other modes less viable. But destination parking is critical to mode choice, with availability, price and regulation all important. The planning system has to work with

		<p>car parking providers and parking regulators to create a parking system which works in the public interest. Pricing can be used to manage demand. Regulation and enforcement can be used to control undesirable parking. Parking standards, if applied, are often criticised because other parts of the parking system are not in place, leading to overspill effects and/or congestion. In the case of Taunton those elements also all need to be in play to maximise use of the park and ride services. We would recommend that SW&T work towards an integrated approach to parking.</p> <p>Provision of safe cycleways on main routes combined with low speed, low traffic neighbourhoods to create a safe network, and a bus network that functions (7 days a week, 18 hours a day) with guaranteed minimum service standards and affordable fares, so that people have genuine mode choice is recommended in parallel with parking measures.</p> <p>In respect to rural bus services, a key issue is the catchment areas of bus stops. One option is to provide cycle parking at bus stops on main routes, which greatly increases the catchment area of the stop, potentially increasing viability. This is a common approach in the Netherlands, where small interchanges exist at the edge of villages and small towns by the main road, comprising bus bays, extensive cycle parking and a few car parking spaces. Bike carrying buses are an option used in some areas also.</p> <p>The transport theme group working on the Somerset climate strategy has identified the potential for long distance, high frequency, bus services to run on motorways and the strategic road network, connecting to local bus and bike services at park and ride sites and motorway junction service station sites. This system has the potential to remove large volumes of single occupancy car travel from the national network. For example, Taunton residents who work in Exeter might park at Gateway Park and Ride (or cycle or take local buses), then use the motorway express bus, connecting with Exeter Park and Ride services. Does there need to be a policy to support such developments, for example at junction 26?</p>
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		<p>In response to question 6b, we welcome policy approach 6b/1, but also advise that the Department for Transport is due to issue new guidance on the design of cycling infrastructure, and we would suggest that this guidance should be incorporated. We would also stress that policy should require that cycling and walking networks on developments must connect properly with the wider network.</p> <p>We support the other policy approaches under 6b.</p> <p>We note that the SCC travel planning guidance is dated and in need of a refresh and would recommend that SW&T work with the Highway Authority on this, rather than duplicate efforts and resources.</p> <p>In relation to policy 6b/3 on cycle parking, we note with approval the accompanying design guide content on this issue. Cycles need to be as readily accessible as garaged cars if they are to be used on a daily basis. Cycle parking for visitors should also to be considered.</p> <p>Whilst transport assessments are based on a predict and provide basis, the policies proposed here clearly intend that walking, cycling and public transport should be favoured, and as such, emerging guidance for mitigation strategies, should rebalance the transport system away from the dominance of private cars.</p>
<p>The natural and historic environment</p>	<p>Page 34 – Objective 7</p>	<p>In response to this objective we wish to emphasise the important role of quality green space to mental health and wellbeing, as well as a place for physical activity and socialising. Measures to minimise flooding are also important, as flooding has serious and long-lasting mental health impacts on people whose houses have flooded. Trees also perform an important role in reducing the urban heat island effect as well as reducing flows to rivers and can assist with mitigating air pollution. Shade will become increasingly important during this century, so the provision of shade trees on the highway, and on public and private land needs to have a supportive policy</p>

		environment. We therefore support the policy approaches outlined here but would also suggest a specific policy to support the provision of street trees for shade.
Thriving coastal and rural communities	Page 37 – Objective 8	In relation to this objective we would suggest the hybrid approach, specifically to minimise car-centric development proposals close to the M5 which encourage long-distance commuting.
Wellbeing	Page 39 – Objective 9 Paragraph 5.9.1	<p>has an emphasis on older people, but it is important not to forget to plan for children and young people. Fortunately, planning for one tends to meet the needs of the other in terms of public realm and transport. Children have lost much of the independent freedom of mobility enjoyed by previous generations, and we believe a key policy objective should be to enable children to once again have that freedom to move around and play in their communities, without requiring an adult chaperone or taxi service. Children and young people should be able to independently access schools, after school clubs, sports clubs, cinema etc, and the town centre on foot, by cycle or public transport. Achieving this would of course reduce many short car trips, increase physical activity and improve the wellbeing of children and young people.</p> <p>The term ‘encouraging healthy lifestyles’ is used in this section, which implies a large measure of choice. In reality choice is constrained by the environments in which we live, work and socialise, so we would prefer to use the term ‘enabling healthy behaviours.’ As stated in the introductory paragraphs we would like to explore with planning officers the scope for a Health and Wellbeing SPD.</p> <p>We strongly support the policy approaches included in this section but would also suggest that the plan itself is subject to a health impact assessment so that opportunities to maximise health benefit are identified.</p>

Taunton	Page 41 – Objective 10 question 10a	we would support all three approaches as being likely to increase the attractiveness of the town centre for young people to live, increasing the vitality and viability of the centre. In respect of taller buildings, the significant potential of mid-rise housing should not be overlooked. Car free developments should be considered as well as other transport options (e.g. car club vehicles for shared use or consideration of car free development). We support the policy approaches in this section.
	policy approach 10b/5	this needs to be in the context of a single parking system for Taunton including the park and ride sites, regulation, enforcement and charges. The council’s own data shows that there is currently an overprovision of parking in the town centre, with more to come at the railway station, and potentially Firepool. The viability of the park and ride sites cannot be secured in isolation, so a reduction in town centre car parking, perhaps incrementally over time, may be needed, which would also aid modal shift.
Air Quality		<p>Contrary to a statement in one of the issues papers, air quality in the East Reach AQMA has deteriorated over the last two years, suggesting that additional measures are needed to understand and reduce air pollution from vehicles in this area, potentially requiring measures to reduce traffic congestion and improve flow. We consider that a specific policy will be required on air quality to require an air quality impact assessment for major developments in and around Taunton that may impact, individually or cumulatively, on air quality in the AQMA, in line with the draft Somerset Air Quality Strategy. Henlade also has exceedances, but there is a presumption that the proposed A358 upgrade will lead to compliance there.</p> <p>It is recommended that consideration be given to the Coventry City Council policy, that may be readily adapted. The Somerset Air Quality Steering Group will be able to assist planning officers with drafting if required:</p> <p><i>“Policy EM7 Air Quality</i></p>

		<p><i>1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality and be in accordance with the West Midlands Transport Emissions Framework and associated policies.</i></p> <p><i>2. Major Development proposals will require the submission of an air quality assessment, as they may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address: a) The existing background levels of air quality; b) The cumulative background levels of air quality (related to the cumulative impact of developments in an area); c) The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.</i></p> <p><i>3. A Supplementary Planning Document will be developed to support this Policy.”</i></p>
	Page and Ref	Comments/ Recommendations (Flood and water management)
Issue from Local Plan	General	It is important that SCC understand whether the district wish to pursue the requirement to limit maximum discharge rate of 2 l/s/ha for development within the catchment of the River Tone. The restricted rate was detailed in Taunton Deane Standing Advice and was originally an Environment Agency requirement. The figure has been applied extensively as a requirement for local development sites in the catchment. However, to our knowledge the requirement is not identified in the current SFRA, nor referenced in this document. It will be important to understand the implications of removing this restriction on local flood risk.

		<p>SCC therefore seeks clarification of this position, either direct or within this document.</p>
<p>Local Plan 2040 issues and Options Document</p>	<p>General</p>	<p>Due to climate change flood risk should be a major concern for the county and consequently addressed through the objectives in the local plan.</p> <p>When discussing flood risk in the document it would seem this predominantly relates to fluvial and tidal risks, with little acknowledgement on the importance of surface water, how this will be impacted by climate change, and some indication of what will be needed in terms of management of those risks at a strategic and local level to enable sustainable development. Natural flows paths, surface water flood risk and other sources of flooding are not always well represented in existing mapping and often rely on local knowledge of sites and the wider catchment. When considering development, the extent to which all sources of risk informs site suitability and type of development should be outlined.</p> <p>Throughout the local plan document the term SuDS is used once and there is a single paragraph within 5.7.1 discussing flood risk. SuDS as a term is not defined and this could lead to a range of interpretations, and it should be clear as to the expectation. There are a number of challenges to delivering SuDS. We welcome that developments should dispose of their surface water via sustainable drainage methods. These should be designed to achieve the four pillars of SuDS - amenity, biodiversity, water quality and flood risk – but also their contribution to wider water resource management, public health and wellbeing and climate mitigation (e.g. urban cooling). This is especially important as Taunton is a Garden Town and the main area of growth.</p> <p>There are lots of opportunities for SuDS to be integrated into developments and meet a number of Local Plan aims. Sites should be naturally gravity drained (either infiltrating/ discharge to watercourse, etc) in accordance with the SuDS hierarchy, as use of pumped systems will not accord with wider energy reduction and climate resilience aims.</p>

		<p>SCC recommends that SuDS schemes which convey flows at the surface, designed to be shallow, soft engineered, have a minimal maintenance need/ safety risk, and are integrated throughout a development as part of management train should be the aspiration.</p>
5.1 Carbon Neutrality	14	<p>It is recommended that SW&T explore the potential to include carbon sequestration within SuDS features and carbon neutrality.</p>
5.2.2	21	<p>question 2c - however development is distributed we would advise that all aspects of flood risk are considered at an early stage to determine if a site is suitable for allocation. Consideration should also be given at an early stage, of any strategic requirements in terms of flood risk management for the areas that will receive the greatest density of development and how this might be achieved.</p>
5.2.2	22	<p>Objective 2: We note that some existing sites might be re-appraised with the view to potential de-selection/de-allocation and query whether flood risk and specifically risk from overland flow routes, surface water/groundwater based on the best available information will form part of that process?</p> <p>Small sites, higher density development and previously development sites still require high quality SuDS schemes and constraints should be identified early (contaminated land, high groundwater).</p> <p>Different uses such as commercial, industrial and educational facilities incorporate SuDS that are not easily deliverable on residential plots (e.g. green roofs).</p>
5.3.1		<p>We recognise that delivery of high-quality SuDS schemes is perceived to have a higher cost for developers. We are told that the requirement for surface-led SuDS schemes can make a development unviable due to either real or perceived land take. However, there is little evidence to support these assertions. Therefore, getting good SuDS schemes becomes particularly difficult</p>

		to secure when delivering affordable housing schemes or wherever viability is an issue and the local plan should fully recognise this.
5.4.3 Issue:	29	Consideration should be given to an option for retrofitting SuDS features to improve amenity value of sites.
5.5.1 Issue:	30	Option 5a please consider an amendment to say "carbon reduction and sustainable design"
5.5.1	31	Objective 5 Encourage more emphasis on SuDS features and the benefits these can have. Developers must include SuDS features and provide multiple benefits. SW&T should consider seeking developer contributions for strategic flood risk and drainage infrastructure where necessary.
	33	Opportunities for SuDS and other water features to play a part in green walking and cycling networks to making them attractive and inspiring routes, reconnecting people with their natural environment.
5.7.1 Issue:	34	SuDS features can also support biodiversity net gain aims as part of integrated green infrastructure, green space designations and wildlife corridors. Tree planting has benefits for improved rainfall interception and source control in urban environments, and help support wider catchment management aims.
5.7.2 Issue:	34	This should be discussed in more detail. Flood risk is an increasing concern due to climate change and should be addressed as part of any new development. This should be undertaken by high quality design and by using SuDS features to manage risk. Encourage the use of natural flood management techniques rather than hard engineered solutions.

Objective 7	36	<p>This is a large objective covering a range of issues relating to the natural environment. It is recommended that there should be a stronger and more defined approach to the reduction of flood risk, being absolutely clear what is expected – are developments required to not worsen or actively reduce flood risk?</p> <p>Flood risk reduction can be achieved, along with other planning aims through the use of SuDS and natural flood management techniques. It is recommended that 7b/7 and 7b/8 requires some further definition and reworking – initially suggests not worsening the quality, quantity and availability of water but then says flood risk (i.e. quantity) should be reduced. To reduce flood risk overall would mean all sites would need to provide betterment over existing rates (see earlier comments about retaining the 2l/s/ha requirement for the River Tone). There are clear links between better water resource management, the circular economy and carbon reduction / energy.</p>
5.8.1 Issue		Coastal developments – development in these areas require careful consideration particularly in relation to coastal management practices, slope stability, exceedance routes, springs/ groundwater issues and access to drainage infrastructure. Rural areas might have more issues with regard access to drainage infrastructure – this can result in significant pipework being laid to connect to the nearest waterbody or surface water sewer.
5.9.1	39	Consider the use of SuDS amenity to help improve wellbeing
5.9.1	40	It is suggested that SW&T include SuDS for amenity and health – links with public realm.
5.10	42	It is recommended that SuDS should be included in Environmental Quality and consider/discuss the multipurpose opportunities
	43	It is recommended that SuDS should be included as part of the policy for garden communities, high quality design and green and blue infrastructure.

5.11	25	It is recommended that SW&T encourage SuDS future in development design
5.12	46	It is recommended that SW&T encourage SuDS future in development design.
Issue from Local Plan	Page and Ref	Comments/ Recommendations (Ecology Team Comments, Somerset County Council)
Carbon Neutrality	14 question 1a	'As soon as possible' would be of most benefit given the climate emergency and the decline of biodiversity generally, but SCC understand that there is a process.
	15 question 1b	Where wind turbines are concerned we would recommend that these should be located to avoid adverse impacts on wildlife populations, for example through collision mortality of some species of birds and bats, which in turn will affect the Favourable Conservation Status of local populations or where Special Protection Areas are concerned the integrity of the site's conservation objectives. If wind turbines are an option, then we would recommend that mapping needs to be produced to identify acceptable sites for this type of development.
	16 question 1c	1c/1 Whilst we appreciate there is a lead time, we would encourage the target to be set as early as possible in view of the declared climate emergency.
The settlement tiers	18 question 2a	Minehead is constrained by ecological sensitivities due to the proximity of the Exmoor Heaths SAC to the west where there is a risk of increased recreational pressure and or air quality effects degrading habitat within the designated site. In addition, areas to the west and south of the town are used for foraging by barbastelle bats from the Exmoor and Quantocks Oak Woodlands SAC. Barbastelle bats have individual and traditional hunting territories within a colony's home range and effects on one of these can have a significant effect on the SAC population. To the east of the town is the Dunster Marshes Local Wildlife site.

		It is requested that consideration is given to the possibility of reducing the tier from Major Rural Centre.
18 Question 2b		No comment
21 Question 2c		<p>i) Both Minehead and Wellington are ecologically sensitive, and housing should be redistributed to tiers in less sensitive areas if this is to be sustainable. It is possible for development to be accommodated in Wellington, however offsite habitat enhancement will be required for the species affected (rare bats, dormice, great crested newts) so that the Favourable Conservation Status of these populations are maintained and enhanced in accordance with the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') and Government policy for biodiversity gain.</p> <p>ii) Taunton is surrounded by populations of European protected species (rare bats, dormice, great crested newts). Offsite habitat enhancement would need to be provided for those species affected so that the Favourable Conservation Status of these populations are maintained and enhanced in accordance with the Habitats Regulations, e.g. regulation 43, and Government policy for biodiversity gain.</p> <p>iii) No comment</p> <p>iv) No, due to the ecological sensitivities stated above</p> <p>v) Watchet is ecologically sensitive (rare bats, dormice). Both Watchet and Williton could result in adverse air quality effects on the woodland in Quantock component of the Exmoor and Quantocks Oak Woodlands SAC due to increased traffic towards employment centres. In addition, the woodlands could be subject to additional recreational pressure resulting in habitat degradation and potentially increasing disturbance at barbastelle bat roost sites, which could cause abandonment.</p> <p>vi) The M5 corridor is less likely to present ecological issues that could occur along the coast.</p>

	22 Question 2d	It is recommended that the Sustainability Appraisal should consider how avoidance of ecologically sensitive areas is considered in determining allocation sites and where there are potential issues where replacement habitat off site should be developed to ensure that the populations affected are maintained and enhanced in accordance with the Habitats Regulations 2017 and Government policy for biodiversity gain.
New and affordable homes	24 Question 3a	It is recommended that the minimum figure should be maintained to reduce the potential impacts on ecological sensitive areas around towns in the district
	24 Question 3b	Yes – as any ecological impacts can be minimised
	25 Question 3c	No comment
	25 Question 3d	No comment
	26 Question 3e	3e/7 – should also guide development on biodiversity net gain and link to the Somerset Pollinator Strategy
A prosperous economy	28 Question 4a	No comment
	28 Question 4b	We should allow the omission of those in ecologically sensitive areas initially, e.g. Longforth Farm, Wellington
	29 Question 4c	No comment
Infrastructure	31 Question 5a	No comment

	31 Question 5b	<p>5b/1 It is recommended that the Viability Assessment will need to ensure that costs involved with biodiversity mitigation and enhancement, including any offsite requirements are included.</p> <p>5b/4 needs to be prioritised. Sustainable Urban Drainage Systems should primarily be above ground and aimed at providing habitat for wildlife.</p>
Connecting people	33 Question 6a	No comment
	33 Question 6b	6b/3 Policy would need to include when considering development of corridors, particularly canals, the need to avoid creating disturbance to species easily disturbed by human activity, for example kingfishers
The natural and historic environment	34 Question 7a	<p>It is strongly recommended that all land use developments should provide net habitat gain, demonstrated using the Somerset Habitat Evaluation Procedure, which includes criteria and a metric for species populations and Natural England's Biodiversity Metric 2.</p> <p>We would request that forward planning facilitates, and is designed around, Nature Recovery Networks (NRNs), an approaching mandatory requirement of the Environment bill. SW&T will be required to work in partnership with Somerset Wildlife Trust to develop robust, cohesive and resilient NRN across the area, providing links to the surrounding areas. SCC would also like to see Policy support for new development accommodating space for pollinators as part of the Somerset Pollinator Action Plan, providing onsite and linked habitat for pollinators, including species with generic and specialist requirements. In addition to SuDS designed to accommodate wetland and associated habitat, new development should support natural climate solution to sequester carbon onsite, to include set aside, creation and natural regeneration of trees, woodland, orchards and scrub areas, and if suitable bogs and marshes.</p>
	36	Additional policy approaches are supported.

	Question 7b	7b/10 Depends on the type of development and its location within these zones. The 'test of significance' is stage 1 of a Habitats Regulations Assessment. Following case law any development requiring mitigation will require at least both Stage 1 and Stage 2 Appropriate Assessment.
Thriving coastal and rural communities	38 Question 8a	This depends on the ecological sensitivity around the settlement
	38 Question 8b	8b/1 Policy could include acceptability in terms of ecology 8b/6 And also the coastal hinterland 8b/8 All development should provide a biodiversity net gain. This could be included as an additional policy or with reference to 7a above
Wellbeing of our residents	40 Question 9a	It is recommended that there is a need to include provision for local access to the natural environment which has shown to have health and social benefits.
Taunton	42 Question 10a	No comment
	43 Question 10b	10b/8 The River Tone provides an important wildlife corridor and needs to be enhanced for wildlife so that potential conflict with increased access is avoided. A standoff distance for development should be given in policy to avoid adverse impacts including from lighting, for example see https://www.bathnes.gov.uk/sites/default/files/ba306_bath_bats_and_lighting_guide_10_june_2018.pdf . See also regulation 41 of the Habitats Regulations 2017

Wellington		Key Issues: the presence of sensitive wildlife around the urban fringe has been missed as a key issue for the town
	45 Question 11a	11a/4 Longforth Farm employment site. SCC would ask that particular consideration is given to this allocation, as there is concern due to presence of populations of sensitive species including rare bats, dormice and great crested newts. A rare barbastelle bat maternity roost 200 metres to the east of the housing development has been abandoned probably from disturbance. Barbastelle bats occupying their roosts are known to be sensitive to anthropogenic disturbance. Further development is likely to additionally destroy/degrade traditional hunting areas used by individuals from this colony affecting the Favourable Conservation Status of the local population.
The Coastal Strip	Question 12a	12a/2 Gateways have the potential to encourage increased recreational pressure and adverse air quality effects on habitats within the Exmoor and Quantocks SACs.
Issue from Local Plan		Comments/Recommendation (Acoustics)
General		<p>SCC would encourage SW&T to identify the Noise Policy Statement of England (that is a basis for the consideration of noise) within the plan making process. We would recommend that where appropriate, SW&T identify tranquillity as a land attribute and highlight a need for a consideration of noise within quieter rural and urban space and as a feature of amenity.</p> <p>Similarly, you may wish to identify that levels of noise below those that impact on amenity may also have impact on the quality of an environment.</p> <p>When considering Sports development, the risks associated with noise on residential amenity should be considered.</p>

		<p>When drafting housing policies please consider if these would benefit from referencing 'ProPG Professional Practice Guidance on Planning & Noise - New Residential Development' and links to Public Health Outcomes Framework 2017</p> <p>When allocating development close to existing infrastructure, it is recommended that consideration is given to identifying links between housing development that might be affected by highway noise and responsibilities for noise reduction under Noise Action Planning</p> <p>Many plans considered development impact on residential amenity, but not the conflict that may arise when new amenity expectations might constrain nearby allocated land uses. This could be a particular issue in farm diversification and revised GDO permitted development rights.</p>
Issue from Local Plan	Page and Ref	Comments/ Recommendations (Mineral and Waste Planning Authority)
Section 3 – about our plan area	10	<p><i>Somerset is a two-tier local authority area and Somerset County Council is responsible for preparing the Minerals and Waste Local Plans. We will continue to work closely with the ENPA and the County Council to ensure that our Plans relate well to each other.</i></p> <p>We welcome the commitment made by the new district council to continue to work closely with the county council (as the Mineral and Waste Planning Authority for Somerset excluding Exmoor National Park) to ensure that our plans relate well to each other. Where applicable, comments in our response to your consultation highlight relevant planning policy in our adopted plans – the Waste Core Strategy (WCS) and the Somerset Minerals Plan (SMP).</p>
5.1.2 - Delivering low carbon	15, Option 1b	<p><i>Question 1b: Should we allocate sites for specific renewable energy development or identify broad areas which we consider suitable?</i></p>

<p>and renewable energy infrastructure</p>		<p>Energy from waste facilities could fall within the scope of renewable energy sites, including anaerobic digestion (AD) facilities. Section 7 of the adopted Waste Core Strategy (WCS) discusses local interest in energy recovery (para 7.17 – 7.22), and identifies the potential role of waste in low carbon development, the potential for making local use of power or heat that can be generated from waste (para 7.18) and the need to continue dialogue with the district councils to make the most of emerging opportunities (para 7.20). Relevant policy WCS3: other recovery.</p> <p>There is further discussion of preferred locations for non-strategic sites waste sites, including AD facilities in chapter 10 of the WCS (paras 10.5 – 10.9), encouraging waste management development to link up with neighbouring businesses that produce waste for treatment or have demand for the products from treatment such as materials or energy. Relevant policy DM1: basic location principles.</p> <p>Any spatial strategy for renewable energy sites that could include energy from waste facilities should have regard to relevant policies within the adopted Waste Core Strategy, notably WCS3 and DM1.</p>
	<p>Page 16</p>	<p><i>We propose these additional policy approaches to meet Objective 1:</i></p> <p><i>1c/7 Maximise the efficiency and convenience of recycling with a policy ensuring good accessibility for waste/recycling vehicles in new developments and the good design of waste and recycling facilities for homes.</i></p> <p><i>Question 1c Do you have any comments on these policy approaches:</i></p> <p>We welcome the proposed policy approach (1c/7) – it is in accordance with objective A of the WCS: to encourage waste prevention as a priority from the outset and throughout the life of new developments and Objective E: to empower local communities to become more involved in the management of waste as a resource (working with district and borough planning</p>

		<p>authorities to support the provision of adequate facilities for storage and sorting of waste in new development).</p> <p>Chapter 6 of the WCS describes the approach to Recycling and reuse in Somerset, paragraphs 6.1-6.6 discussing the kerbside collection arrangements for household waste in Somerset and the developer guidance issued by Somerset Waste Partnership (SWP) on designing adequate space and facilities for recycling and waste containers and adequate access for collection vehicles. Relevant policy WCS2: recycling and reuse.</p> <p>We note that the proposed policy 1c/7 refers to good access in new developments and the good design of waste and recycling facilities in homes only. We would encourage SWTC to broaden the scope of the policy to include good design of waste and recycling facilities in residential <u>and</u> non-residential development, in line with policy WCS2.</p> <p>We would encourage the proposed policy 1c/7 to signpost to the SWP developer guidance to ensure that developers provide adequate space and facilities for waste separation and storage and access for waste collection. Also to the Country Councils developer guidance for adopted highways "Estate Roads in Somerset – Design Guidance Notes" to ensure that highway design supports the effective collection of waste and recycling in new developments.</p> <p>Whilst proposed policy 1c/7 considers the management of waste for the occupants of new development, there are no proposed policies in relation to waste prevention, the most desirable approach to waste management within the waste hierarchy. Policy WCS1 describes how the county council as the WPA will work with local planning authorities to promote <u>and require</u> developers to plan effectively for waste prevention and the sustainable management of waste generated during the design and construction phase of any development – the level of detail being proportionate to the scale of the development and this supporting information to be submitted with planning applications. Relevant policy: WCS1: waste prevention.</p>
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		<p>We would ask SWT to consider how designing development for waste prevention and the sustainable management of waste can be incorporated into the future local plan, in accordance with the requirements of policy WCS1.</p>
<p>5.4.2: making better use of employment sites</p>	<p><i>Page 28, option 4b</i></p>	<p><i>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?</i></p> <p>As the MPA for Somerset, SCC did not object to the broad locations for growth identified in the Taunton Deane Core Strategy or the Site Allocations plan but encouraged dialogue with the borough council on a case by case basis where non-mineral development is proposed in an area safeguarded for its mineral resource. In relation to waste management development, as the WPA for Somerset, SCC supported the proposed approach to employment allocations noting the scope to support waste management development.</p> <p>Any assessment of existing employment allocations across both former local plan areas should have due regard for safeguarding policies within the adopted Minerals Plan and Waste Core Strategy. Relevant policies: SMP9: safeguarding and DM5: safeguarding waste management sites.</p> <p>Further guidance on safeguarding matters can be found in associated topic papers (available from the SCC website) and the Planning Officer Society (POS) Mineral Safeguarding Practice Guidance¹.</p> <p>SCC looks forward to continued further dialogue with the new council on a case by case basis.</p>

¹ https://www.mineralproducts.org/documents/MPA_POS_Minerals_Safeguarding_Guidance_Document.pdf

		See also comments in response to question 4c.
5.4.3: improving vitality of our town centres	Page 29	<p><i>We propose these additional policy approaches to meet Objective 4, including:</i> <i>4c/1 Supporting clean energy and digital technology and infrastructure sectors,</i> <i>4c/2 Developing a circular economy in which we keep resources in use for as long as possible,</i> <i>then recycle and regenerate products and materials</i></p> <p><i>Question 4c: Do you have any comments on these policy approaches?</i></p> <p>As the WPA for Somerset, we welcome SWTC's recognition of opportunities from moving to a more Circular Economy (CE) and the use of waste as a resource. This is in accordance with the principles of the waste hierarchy, enshrined in European, national and local waste policy - the adopted Waste Core Strategy (WCS). This policy approach would support the WCS vision for sustainable waste management in Somerset: "A culture in which communities participate in waste prevention and in which unavoidable waste is managed as a valuable resource in innovative ways that:</p> <ul style="list-style-type: none"> ● strengthen the economic well-being of Somerset; ● protect the county's unique environment and human health; and ● reduce carbon emissions from waste management" <p>We would encourage SWTC to consider other uses for currently allocated employment land, to determine their suitability for proposed policies 4c1 and 4c2.</p>

		<p>We would welcome the opportunity to discuss CE opportunities further with SWTC noting that we have commenced a review of our waste local plan and are currently updating our evidence base, including an updated Waste Needs Assessment (WNA). The WNA will identify how much waste will need to be planned for in Somerset over the waste plan period; assess the waste management capacity required to manage the forecast waste arisings; and identify whether any sites will need to be allocated for any waste streams.</p>
<p>5.12 Policies for our Places: The Coastal Strip</p>	<p>Page 47</p>	<p><i>The proposed policy approaches for the Coastal Strip area includes:</i> <i>12a/1 Supporting new employment sites and job generating activities in the key towns.</i></p> <p><i>Page 47, Question 12a: Do you have any comments on these policy approaches?</i></p> <p>We do not wish to comment specifically on the policy approach for the Coastal Strip but wish to make a general observation. We note that within this section on the Coastal Strip and other sections within the document, there is discussion of latest developments at Hinkley Point C site (under development). However there is no reference to the adjacent power station sites – Hinkley Point A (in decommissioning phase) and Hinkley Point B (operational but due to cease power generation and enter decommissioning phase during the plan period).</p>

Paul Browning
Strategy Specialist

Somerset West and Taunton Council

Please ask for: Paul Hickson

Email:

Direct Dial:

Date: 16 March 2020

Dear Paul

Somerset West and Taunton District wide Local Plan to 2040

Thank you for your message of 13 January 2020 seeking feedback about suggested cross boundary strategic issues to be addressed in the Somerset West and Taunton District wide Local Plan.

Somerset County Council broadly endorses the summary of cross boundary strategic issues to be addressed in Somerset West and Taunton District as set out in your note. This endorsement is subject to the following key points:

- **Infrastructure provision (education, highways and transport)** – We note and agree that infrastructure provision is identified as a key cross boundary issue related to enabling growth in the area. Your letter specifically refers to digital, health and wellbeing; and identifies transportation along the M5 / A38 corridor (road and rail) and the Strategic Employment Site allocation at Junction 25 (Known as Nexus 25). These are agreed but we suggest that provision of appropriate education, highways and transport infrastructure are also identified as strategic cross boundary issues, and particularly the need to establish how development will pay for the extra education, highways and transport capacity necessary to support and enable new housing development. A failure to provide sufficient school-place capacity for instance will result in a need to transport children increasingly further away from their home to find a spare place which may create cross boundary impacts. If school places cannot be created near to homes then SW&T's locational decisions regarding allocation of new sites should take into account availability of school capacity with a view to locating new development where there is capacity. Similarly the location of new housing will place pressure on highways and transport systems and available capacity may need to influence locational choice if new development is unable to pay for increased capacity. The nature of the development

should seek to reduce the need to travel in the first instance and seek to retain self-contained settlements.

- **Impact of Hinkley Point C** - Somerset County Council endorses the recognition of the impact of the development of Hinkley Point C as a strategic matter with cross boundary matters requiring joint working between the partners. However we consider that there are also cross boundary strategic matters again requiring joint working relating to the ongoing **decommissioning of Hinkley Point A, likely decommissioning of Hinkley Point B** and possible consideration of legacy uses for parts of the site that may arise during the plan period. Given the facts we would suggest that this issue should be broadened to impact of the overall Hinkley Point site rather than solely focused on "C" matters;
- **Mitigation and adaptation to the climate emergency** – given the significance of this issue, the fact that all Somerset Councils have made climate emergency declarations and the likely cross boundary aspects of this relating to strategic planning we would suggest that this issue is considered a strategic matter requiring active consideration by the Duty to Co-Operate partners in addition to the three issues identified in your note
- **Social mobility** – as you will know West Somerset is identified in Social Justice Commission data as one of the areas of the country with the lowest levels of social mobility. This is a strategic issue for Government and resulted in the area's designation as an Opportunity Area – we would suggest that this issue is identified as a further active consideration by the Duty to Co-Operate partners. Access to services, labour market challenges, the area's narrow economic base and high housing costs are all factors in this. There are cross boundary dimensions to this – at the local level in that the incidence of low social mobility spans the Exmoor and District Local Plan areas and more broadly in the transformation of this position will relate to a number of the other issues identified in your note.
- **An evidence based approach** – An appropriate evidence base should be developed to enable identified the potential impacts of proposed new development to be fully understood and where appropriate mitigated.

I hope that these comments are helpful and Somerset County Council looks forward to working further with your Council during the forthcoming stages of this process.

Yours sincerely

Paul Hickson
Assistant Director
Economy and Community Infrastructure - Commissioning

Issue from Local Plan	Page and Ref	Comments/ Recommendations Response from the Director of Public Health – Draft
Strategies	5	It is important that the Joint Strategic Needs Assessment, and the Somerset Health and Wellbeing Strategy (Improving Lives) that arises from it form part of the evidence informing this plan and are clearly referenced within it. The Local Cycling and Walking Infrastructure Plan (LCWIP) for Taunton, currently in draft, likewise.
Carbon Neutrality	14 Objective 1	Global heating represents the single greatest threat to public health this century at the planetary scale, so we strongly support the emphasis on seeking to achieve net zero by 2030 in Objective 1, while recognising the scale of the challenge involved. It is imperative that rapid decarbonisation takes place throughout this decade, so aiming for 2030, even if this is not achieved in reality, is essential. A much later target date would risk losing the sense of urgency that this planetary emergency necessitates.
	1a	We would favour the earlier date of 2025. This is not a situation where new technologies are required to be developed, merely the application of existing technologies at scale and pace. While outside the scope of the local plan, we would also emphasise the need for stronger building regulation to ensure that completed buildings meet energy performance standards in reality.
	1c	In relation to Policy 1C/2, there is a need to consider the extent to which vehicle charging should be provided. If there is a move towards car clubs and mobility as a service (MAAS), possibly autonomous vehicles, then it may be necessary to require chargers for such vehicles. There is a materials resource and viability implication in providing chargers for all residential spaces, which may represent an over provision, while leaving an undersupply of shared chargers. You may wish to consider how this policy can be future proofed to allow for potential changes in vehicle ownership and usage. There is also a need to ensure that chargers on the highway are positioned so as not to impinge on footways and cycleways i.e. they should be intrinsic to parking bays.

Sustainable Locations	17 Objective 2	We strongly support the broad thrust of this section and in particular, <i>“New development should put people rather than vehicles at its heart. It should facilitate easy access to day-to-day services and be designed to prioritise walking, cycling, and the use of public transport to provide real choices for everyone. Development in sustainable locations drives up the viability of public transport services to those locations, creating the opportunity to further improve services and living conditions. Transport considerations need to be fundamental to the Local Plan process and not retrofitted later</i>
	2d	The issue of housing provision outside of Taunton and Wellington must be informed by the social viability of settlements having regard to the aging demographics, especially in West Somerset, so that both public and private services are sustainable. In particular the need for genuinely affordable housing to rent is crucial to allowing young adults and essential workers to make their homes in those communities where house prices are beyond the reach of first-time buyers.
	2b/1, 2b/2 and 2b/3. 2b4	We strongly support policies 2b/1, 2b/2 and 2b/3. In relation to policy 2b/4, is there scope to amend it to address the issues outlined in the paragraph above? There is also potential to consider the scope for multi-use developments, such as primary school, residential care home and rental apartments for teaching and care staff on a single site, to facilitate inter-generational support and affordable housing to rent, and a policy explicitly welcoming such approaches might be helpful in encouraging developers and public services to bring forward proposals.
New and affordable homes	Page 23 Objective 3 question 3c	we support option (ii). The changing nature of our population demographics means we will need more homes that are accessible, so it is important that developments include such provision.

	question 3e	we support all the proposed policies. We strongly support proposed policy 3e/4, so that housing provision by settlement is based on need, rather than speculative market development, and agree that a SPD or TAN is appropriate to set out the detail, providing sufficient flexibility to respond to changing market and national housing policy and finance conditions.
	policy 3e/6	<p>We also strongly support minimum space standards in proposed policy 3e/6. We already see in some permitted development applications accommodation which falls well short of minimum space standards, both in general and in relation to bedroom size. Minimum space standards set a decent basic standard, and it is not appropriate to permit unconstrained market forces to undercut such standards to the detriment of physical and mental health. There is considerable evidence of the impacts of inadequate space on families in terms of overcrowding, inability to eat around a dining table, lack of privacy, lack of space for homework, and insufficient space to entertain guests. Such issues can have detrimental effects on family life, including on mental health, and educational achievement.</p> <p>We would like to see an additional policy in relation to affordable housing. Such housing is often located on the least desirable part of a plot in a block and is clearly and obviously affordable housing. We would advocate a tenure-blind approach, so that it is not apparent from the outside whether a property is affordable or otherwise. Properties should be distributed throughout a development, not concentrated in one area.</p>
A prosperous economy	Page 27 – Objective 4	We wish to emphasise that a healthy population is a key contributor to a healthy and prosperous economy. Conversely a population that has high levels of illness, including long-term conditions such as type 2 diabetes arising primarily from obesity, cannot achieve its economic potential. Somerset has high levels of adult obesity and rapidly rising incidence of type 2

		<p>diabetes. Investment in measures to improve population health, including public policies that support healthy and active environments, is therefore essential to improving productivity and economic wellbeing. Given the constrained supply of labour in this county, maximising the health of the population, both of working age and the retired, is crucial to sustainability.</p>
	question 4b	<p>we would urge that employment sites that are well served by rail and bus should be retained, in order to assist with modal shift and the climate agenda. Employment uses that could and should be within towns should not be permitted on land that is in reality highly car dependent, such as close to junction 25. Such car dependent locations discriminate against those without use of a car and tend to increase long-distance car commuting along the motorway/A303 that is not compatible with the climate emergency.</p>
Infrastructure	Page 30 Objective 5	<p>We welcome the viability assessment of this plan. We note that affordable housing is the largest impact on viability, but also wish to highlight the significant impact that provision for cars has on viability, in terms of land take for roads and especially parking. In this respect there is an opportunity to consider parking standards in the context of climate change. We presume you will need to do so anyway, as West Somerset operated to SCC optimum standard, whereas TDBC had a tighter standard. We will return to this issue later in this response.</p>
	question 5a	<p>The climate emergency should be prioritised, BUT we consider that national policy and regulations on minimum energy standards should drive this rather than local planning policy, and that this may well come to pass in the next few years, perhaps before this plan is adopted. We also tend to agree that the lower running costs of highly energy efficient housing will attract a higher market price. Therefore, you need to allow flexibility to respond to changing national policy in allocating developer contributions.</p>

		<p>In relation to strategic infrastructure we are pleased to see the emphasis in relation to transport is not on roads and junctions. To this end, you may wish to consider a SPD or TAN on transport assessments, so that the current emphasis on predict and provide for car traffic, and lip service to other modes, is reversed. In this regard we would refer you in particular to the publications of Transport for New Homes, specifically the Checklist for New Housing Developments, and the recent CIHT publication, "Better planning, better transport, better places." The latter document in particular provides something of a roadmap to using the full scope of the NPPF to enable modes other than the car, and we would strongly urge you to include this document in developing the plan and as evidence to support the plan.</p>
<p>Connecting People</p>	<p>Page 32 – Objective 6</p>	<p>The "Movement" section refers to the need to encourage people to walk and cycle, but the evidence clearly shows that encouragement is not what is needed. Encouragement cannot overcome fear! The major barrier to increased walking and especially cycling is the perception that it is simply unsafe to do so, due primarily to motor traffic: speed, volume, pavement parking etc. What is required is not encouragement but enabling measures so that people feel safe to cycle and walk, and that largely involves not mixing with high volume motor traffic or at speeds over 20mph.</p> <p>With respect to bus services we recognise that there are limits to the role of planning in the absence of bus regulation. Nevertheless, it would be helpful to set out desirable minimum service standards as an aspirational target on what level and frequency of bus service should be available to communities of various sizes and/or on main corridors. This is common practice on the continent of course¹.</p> <p>Once standards are set it should then become possible for transport assessments to consider how developments might contribute to the development of bus services aimed at meeting those standards, even if incrementally. This would be a sea change from the current approach of stating</p>

		<p>that services and bus stops exist, therefore the development is sustainable, regardless of frequency or availability at evenings and weekends. Furthermore, if those current service standards are well below the aspirational service levels, and little or no action is proposed by a developer to increase service levels, then one may argue that such a development site is not sustainable, as it will be very car dependent.</p>
	<p>question 6a</p>	<p>the question of car parking at both origin and destination is important, as well as park and ride in the case of Taunton. Generous parking provision on housing developments both enables multi-car households and makes other modes less viable. But destination parking is critical to mode choice, with availability, price and regulation all important. The planning system has to work with car parking providers and parking regulators to create a parking system which works in the public interest. Pricing can be used to manage demand. Regulation and enforcement can be used to control undesirable parking. Parking standards, if applied, are often criticised because other parts of the parking system are not in place, leading to overspill effects and/or congestion. In the case of Taunton those elements also all need to be in play to maximise use of the park and ride services. We would urge the district council to work towards an integrated approach to parking, of which planning is just one part.</p> <p>If that is the stick, we also need the carrot of safe cycleways on main routes combined with low speed, low traffic neighbourhoods to create a safe network, and a bus network that functions 7 days a week, 18 hours a day with guaranteed minimum service standards and affordable fares, so that people have genuine mode choice.</p> <p>In respect to rural bus services, a key issue is the catchment areas of bus stops. One option is to provide cycle parking at bus stops on main routes, which greatly increases the catchment area of the stop, potentially increasing viability. This is a common approach in the Netherlands, where small interchanges exist at the edge of villages and small towns by the main road, comprising bus</p>

	<p>bays, extensive cycle parking and a few car parking spaces. Bike carrying buses are an option used in some areas also.</p> <p>The transport theme group working on the Somerset climate strategy has identified the potential for long distance, high frequency, bus services to run on motorways and the strategic road network, connecting to local bus and bike services at park and ride sites and motorway junction service station sites. This system has the potential to remove large volumes of single occupancy car travel from the national network. For example, Taunton residents who work in Exeter might park at Gateway Park and Ride (or cycle or take local buses), then use the motorway express bus, connecting with Exeter Park and Ride services. Does there need to be a policy to support such developments, for example at junction 26?</p> <p>In response to question 6b, we welcome policy approach 6b/1, but also advise that the Department for Transport is due to issue new guidance on the design of cycling infrastructure, and we would suggest that this guidance should be adopted locally. We would also stress that policy should require that cycling and walking networks on developments must connect properly with the wider network. We have an example in Monkton Heathfield where the internal network does not connect to the canal path, for example. We support the other policy approaches under 6b.</p> <p>We note that travel planning guidance is now quite dated and has little to say on car clubs for example, and how such provision might reduce parking requirements on developments. Similarly, the potential for e-bikes to contribute to local transport and replace some car trips is not included in current travel planning guidance, as e-bikes were not available at the time the guidance was published.</p> <p>In relation to policy 6b/3 on cycle parking, we note with approval the accompanying design guide content on this issue. Too often developers are content to provide a garden shed at the rear of the property to satisfy cycle parking requirements. It should be made clear this will not normally</p>
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		<p>be accepted. Cycles need to be as readily accessible as garaged cars if they are to be used on a daily basis. Cycle parking for visitors needs also to be considered.</p> <p>As noted previously, transport assessments are currently based on a predict and provide basis, building in car dependency. The policies proposed here clearly intend that walking, cycling and public transport should be favoured, with a rebalancing of the transport system away from the dominance of private cars. Capital investment programmes for transport continue to be dominated by road schemes. A rebalancing needs to recognise that there has been very little investment in buses and cycling for decades, and that a major switch in funding priorities is required to enable a sustainable future transport system. From a planning perspective this requires a shift from 'predict and provide' to 'decide and provide', together with transport assessment and travel planning guidance to reflect changed priorities.</p>
The natural and historic environment	Page 34 – Objective 7	<p>In response to this objective we wish to emphasise the important role of quality green space to mental health and wellbeing, as well as a place for physical activity and socialising. Measures to minimise flooding are also important, as flooding has serious and long-lasting mental health impacts on people whose houses have flooded. Trees also perform an important role in reducing the urban heat island effect as well as reducing flows to rivers and can assist with mitigating air pollution. Shade will become increasingly important during this century, so the provision of shade trees on the highway, and on public and private land needs to have a supportive policy environment. We therefore support the policy approaches outlined here, but would also suggest a specific policy to support the provision of street trees for shade.</p>
Thriving coastal and rural communities	Page 37 – Objective 8	<p>In relation to this objective we would suggest the hybrid approach, specifically to minimise car-centric development proposals close to the M5 which encourage long-distance commuting.</p>

<p>Wellbeing</p>	<p>Page 39 – Objective 9 Paragraph 5.9.1</p>	<p>has an emphasis on older people, but it is important not to forget to plan for children and young people. Fortunately, planning for one tends to meet the needs of the other in terms of public realm and transport. Children have lost much of the independent freedom of mobility enjoyed by previous generations, and we believe a key policy objective should be to enable children to once again have that freedom to move around and play in their communities, without requiring an adult chaperone or taxi service. Children and young people should be able to independently access schools, after school clubs, sports clubs, cinema etc, and the town centre on foot, by cycle or public transport. Achieving this would of course reduce many short car trips, increase physical activity and improve the wellbeing of children and young people.</p> <p>The term ‘encouraging healthy lifestyles’ is used in this section, which implies a large measure of choice. In reality choice is constrained by the environments in which we live, work and socialise, so we would prefer to use the term ‘enabling healthy behaviours.’ As stated in the introductory paragraphs we would like to explore with planning officers the scope for a Health and Wellbeing SPD.</p> <p>We strongly support the policy approaches included in this section but would also suggest that the plan itself is subject to a health impact assessment so that opportunities to maximise health benefit are identified.</p>
<p>Taunton</p>	<p>Page 41 – Objective 10 question 10a</p>	<p>we would support all three approaches as being likely to increase the attractiveness of the town centre for young people to live, increasing the vitality and viability of the centre. In respect of taller buildings, the significant potential of mid-rise housing should not be overlooked. Car free developments should be encouraged as well as developments that have a limited number of car club vehicles for shared use. Is there scope for a car free development zone boundary for the centre in which there will be a presumption against parking provision for anything other than car club vehicles? We support the policy approaches in this section.</p>

	policy approach 10b/5	this needs to be in the context of a single parking system for Taunton including the park and ride sites, regulation, enforcement and charges. The council's own data shows that there is currently an overprovision of parking in the town centre, with more to come at the railway station, and potentially Firepool. The viability of the park and ride sites cannot be secured in isolation, so a reduction in town centre car parking, perhaps incrementally over time, may be needed, which would also aid modal shift.
Air Quality		<p>Contrary to a statement in one of the issues papers, air quality in the East Reach AQMA has deteriorated over the last two years, suggesting that additional measures are needed to understand and reduce air pollution from vehicles in this area, potentially requiring measures to reduce traffic congestion and improve flow. We consider that a specific policy will be required on air quality to require an air quality impact assessment for major developments in and around Taunton that may impact, individually or cumulatively on air quality in the AQMA, in line with the draft Somerset Air Quality Strategy. Henlade also has exceedances, but there is a presumption that the proposed A358 upgrade will lead to compliance there.</p> <p>Coventry City Council has a policy that may be readily adapted. The Somerset Air Quality Steering Group will be able to assist planning officers with drafting if required:</p> <p><i>"Policy EM7</i> <i>Air Quality</i> <i>1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality and be in accordance with the West Midlands Transport Emissions Framework and associated policies.</i></p>

		<p><i>2. Major Development proposals will require the submission of an air quality assessment, as they may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address: a) The existing background levels of air quality; b) The cumulative background levels of air quality (related to the cumulative impact of developments in an area); c) The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.</i></p> <p><i>3. A Supplementary Planning Document will be developed to support this Policy."</i></p>