

**From:** [REDACTED]  
**To:** [Povall, Sarah](mailto:Povall.Sarah)  
**Subject:** Stoke St Mary Parish Council  
**Date:** 07 March 2020 19:16:00  
**Attachments:** [image001.png](#)

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Hi Sarah

I have attached the Stoke St Mary response to the Issues and Options Consultation. If you could feed it into the process I should be grateful.

Thank you for your help.

Colin

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**From:** Povall, Sarah <S.Povall@somersetwestandtaunton.gov.uk>  
**Sent:** 11 February 2020 12:25  
**To:** [REDACTED]  
**Subject:** Re: Local Plan - consultation portal

Hi Colin

I've corrected it on the portal now – it should have been [strategy@somersetwestandtaunton.gov.uk](mailto:strategy@somersetwestandtaunton.gov.uk). Thanks for letting me know though!

You can forward any comments to me or to the strategy inbox and I'll make sure they get where they need to be.

All the best  
Sarah

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**From:** Povall, Sarah  
**Sent:** 11 February 2020 11:26  
**To:** [REDACTED]  
**Subject:** Local Plan - consultation portal

Dear Mr Fisher

I had a message to get in touch with you about the consultation portal, as you were having trouble accessing your saved questionnaire. You should be able to get back to your questionnaire by clicking on the link supplied in the email (sent from the consultation portal); without needing to type in the reference number.

I haven't managed to get hold of you on the telephone number supplied; but if you would like to give me a ring, please do (my contact details are below).

Kind regards  
Sarah

Sarah Povall  
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# Stoke St Mary in the Blackdown Vale



Local Plan 2040 Issues and  
Options Consultation  
March 2020



Stoke St Mary Parish Council

## Introduction

This document is Stoke St Mary Parish Council adopted response to the Somerset West and Taunton Local Plan consultation.

It is in two parts

1. Responses to the questions posed in the survey questionnaire
2. Appendices which cover the factual basis and reasoning behind our answers.

There are four appendices:

1. Climate (this is our submission to the Climate consultation)
2. Housing Targets
3. Economic Development
4. Sustainable Locations

## Conclusions

Our conclusions are:

1. The Council needs its own Economic Development Plan which concentrates on higher quality jobs not simply more of them.
2. The Council should not rely on high economic growth in the region but rather a realistic assessment of the potential in the SWT area.
3. The housing targets set out for us by Central Government are not justified and should only be accepted because we have to. Housing should follow economic growth rather than lead it.
4. Subcontracting the provision of affordable housing to developers has not worked and is incompatible with the Councils other objectives.
5. The Council should find ways of providing social rented housing directly.
6. The Council needs to integrate its area through a more radical provision of public transport.

Above all and most crucially, SWT needs to defend the landscapes and boundaries of village settlements which set it apart as a better place to live and work. The valley covered by the parishes of Stoke St Mary, Neroche, Corfe and Pitminster – the Blackdown Vale - is the largest of these valleys in the district and the one under the most pressure from development. It should be designated an Area of High Landscape Value.

## Response to questions

### **Q1a**

Developers should be required to work to the Future Homes Standard as soon as is practically possible. For developments currently under construction they should be required to measure the embodied carbon in the housing and the associated infrastructure.

### **Q1b**

The objective should be to increase the delivery of renewable energy without industrialising the landscape. Solar should use small scale urban sites; onshore wind should be in current industrial settings; energy from watercourses should be small scale.

### **Q2a**

We agree with the current tiers

### **Q2b**

We agree if it is acceptable to the electors of Watchet and Williton

### **Q2c**

The current distribution is the best so long as Minehead and the coastal settlements have considerably improved public transport access to Taunton.

The reference to the M5 corridor in item vi) should be removed, as we do not want Taunton to be a town divided by a Motorway. The M5 must remain as the eastern and southern boundary of Taunton, maintaining this land in the Blackdown Vale as an Area of High Landscape Value.

### **Q2d**

To make the climate agenda work requires concentrated development on brownfield sites. Policy should be guided by that principle.

As part of the Strategic Housing Land Availability Assessments (SHLAA) new sites are put forward as part of the “call for sites”. The current process classes these sites as “potentially developable” or “non-developable”, when a much more accountable and rigorous approach is required, particularly given some potentially developable sites are not adjacent to existing settlement boundaries.

### **Q3a**

There is no evidence that the government target of 702 is justified. It should be treated as a maximum only because we cannot avoid it. There is no evidence for a growth rate sustainable for more than five years that is greater than 2.1%. Housing development in SWT should follow economic growth not lead it. Otherwise we are building for commuters. Accessible and lifetime homes should be based on local needs not a predetermined formula.

The model of subcontracting the delivery of affordable housing to the large developers is not working. The returns demanded by them for “viability” are too high so we are building too many houses and still not meeting our targets for affordable housing.

The council should explore the option of providing the social housing needed in the area directly.

**Q3b**

Allocate sites specifically to prevent opportunistic development.

**Q3d**

Allocate specific sites.

**Q4a**

We need better jobs not more low value jobs. The council needs its own growth strategy. The Heart of the South West Strategic objective of doubling the economy in twenty years implies a consistent growth rate of 3.6% per annum. This is fantasy.

**Q4b**

We should stay with the existing allocation until we have a credible local strategy. Nexus 25 specifically needs to be drawn into that strategy and not just be allowed to develop in its own way.

**Q4c**

These are all sensible policy options in themselves but require a more strategic view of development.

**Q5a**

Our view is that developers are the wrong vehicle for delivering SWT's objectives:

- The viability criteria in the NPPF are frankly ridiculous and matched by very few other businesses in the UK
- The requirements we have for affordable housing and Future Homes Standard will not be reconcilable within the viability criteria

The delivery of affordable housing should be made directly by the council and not delegated to developers. That way we can reconcile our objectives without building thousands of unnecessary new houses.

**Q6a**

The key requirements will be:

- Concentrated urban development
- High speed broadband probably fibre to home
- An increase in local delivery
- More bridleways/cycleways from the villages into the town
- Building a station at Wellington
- Bringing the West Somerset line into Taunton as a regular service.
- Finding an alternative to conventional bus transport for the villages

**Q7a**

Increasing biodiversity can only happen if habitats are first defended, then enhanced, then enforced.

SWT is defined by its landscapes. They need to be protected. Large parts of the area should be covered by a designation of Areas of High Landscape Value. While this has no statutory basis, it will signal the importance of defending them and shape planning decisions.

Enhancement will require policies like the restoration of hedgerows, the reduction in chemical agriculture, tree planting on all new developments, better management of waterways.

Enforcement either needs more resources or a different way monitoring. We have one tree officer, one footpath officer, the commitments on development are almost never followed up because we don't have enough planning staff. Parish and town councils might offer a different way of delivering enforcement.

#### **Q7b**

Preserve the Green Wedges, and designate an Area of High Landscape Value. The valley covered by the parishes of Stoke St Mary, Neroche, Corfe and Pitminster – the Blackdown Vale - is the largest of these valleys in the district and the one under the most pressure from development, which must remain protected.

#### **Q8a**

Settlement boundaries are the first line of defence against rampant development for the villages around Taunton which are under most pressure. They and the open countryside regulations must be maintained. The villages of West Somerset have different needs but can answer for themselves. Class Q Permitted Development Rights for Conversion of Agricultural Building to Residential use consents are also being abused and need to be re-visited.

#### **Q8b**

Development must NOT be allowed outside of settlement limits (Taunton Deane). There is a general distrust of criteria-based planning, as it is open to abuse. Developers can drive a coach and horses through anything with flexibility and councils lack the resources to fight them.

#### **Q9a**

Realising this agenda for housing design will not be possible within the viability criteria. Developers have no interest in designing anything beyond the standard.

No development close to the M5 will stand up to proper assessment of air quality particularly to the east of the M5 given the prevailing winds.

## Appendix 1.

### The impact of housing on climate

All attention is currently focussed on the heating efficiency of housing. This is to ignore the most important problem – embodied carbon. This is the carbon dioxide released in making and using the materials in building houses and their associated infrastructure.

The embodied carbon in new house building accounts for 11% of **all** the UK's emissions. There is a serious conflict in the ambition to reduce carbon emissions and the drive to build 300,000 houses (the 11% is based on 200,000 houses)

In the context of the climate emergency there are three issues, separate but linked, which should shape local planning:

1. Embodied carbon
2. Zero carbon in operation
3. Efficiency in the use of energy

#### Embodied carbon

The existing housing stock carries the embodied carbon in its history. New housing introduces new embodied carbon into the environment. Over the life of the house this is in excess of 0.6 tonnes per square metre, about 50 tonnes. The associated infrastructure adds up to another 40 tonnes per dwelling.

**If climate were our only agenda, we would stop building new houses altogether and seek to use our existing stock to house the growing population.**

However, given that we do need to build new houses we need to find ways of reducing or offsetting the impact on emissions of building new houses.

For our councils, the housing targets handed down by the government through the NPPF are too high. So long as the Government persists in using them, they should be the **maximum** housing target. Reduction and offsetting should be at the heart of every planning application.

#### Reduction

We can reduce the impact of new building by:

- Reusing existing materials
- Where new, switching to sustainable materials like timber
- Not building on greenfield sites so reducing the need for new infrastructure (roads, drives, sewage piping etc.), plus retaining the ability of soil to absorb carbon and not releasing carbon during the build.

To say there are difficulties in this approach is an understatement. There is little consideration for re-use in current practise; sustainable timber is available but the volume needed for the housing targets would overwhelm the indigenous supply; green land is cheaper to build on and will always be the preference for developers.

The Select Committee has shown how the house builders have successfully lobbied the Government to abandon the Future Building Standard and how half of the houses they are still building are to pre-2013 standards.

It is possible to reduce significantly the carbon embodied in new housing but first it has to be measured. Brighton City Council already requires measurement for each new development. Somerset councils should do the same.

## Offset

Each new house needs to offset about 50 tonnes plus of carbon. The associated infrastructure for greenfield development adds another 40 tonnes, depending on the development, brownfield less.

Offset can be done naturally or through generating power equivalent to the offset.

We could plant lots of trees.

A hectare of trees will absorb about four tons of Carbon Dioxide every year, an acre about one and a third. The equivalent area of hedgerow will absorb about two and a half tons.

That is an awful lot of trees.

We could plaster the roof of every house with solar panels.

In the UK a typical standalone 14 panel rooftop array will offset up to one ton of carbon every year so over ninety years it will offset the embodied carbon in one house.

The only problem is that a 14-panel array at 28 sq. metres, is larger than most new rooves.

There is no escaping the impact of new building on our ability to reduce, much less eliminate, carbon emissions. In our view, all new developments should be required to assess the embodied carbon in both the housing and the supporting infrastructure.

## The Zero Carbon Problem

One of the main arguments for new housing being essential is because it can be zero carbon in operation.

The truth is that any house can be zero-carbon in operation, this is not the preserve of newly built designs.

Zero carbon requires only that energy needs (most importantly heating) are met from sustainable sources:

- Heat pumps powered by sustainable electricity

- Storage radiators powered in the same way
- Biomass from sustainable sources
- Green hydrogen

All can make a house Zero carbon, existing or new. There are plenty of “green” electricity suppliers already.

As the source of energy is the critical factor in zero carbon Somerset Councils should be:

- Sourcing their own electricity from green sources
- Supporting the development of Hinkley Point
- Looking proactively at sites for wind-power, perhaps associated with Hinkley Point
- Looking at becoming one of the first to introduce hydrogen into the gas mix as a prelude to full hydrogen into the heating mix as green hydrogen becomes available. (The UK moved from town gas to natural gas in five years from 1959. All gas appliances since 1996 can use up to 25% hydrogen). Keele in Staffordshire is already implementing the partial introduction of hydrogen. Leeds is looking at complete conversion.

### Efficiency in the use of energy

Modern new housing is more efficient in its use of energy than the existing housing stock. It is an unrealistic counsel of perfection to expect this to change. However, efficiency in the existing housing stock can be raised by low cost, relatively simple developments. For perspective, UK average housing, currently EPC D60, can be raised to around C75 by:

- Upgraded roof insulation
- Cavity wall insulation
- Solar water heating panel
- Condensing boiler

Most of this can be done for less than 5% of the market value of the average house.

External insulation, improved double glazing, forced ventilation and the replacement of solid floors are more expensive but will further improve the energy performance of the existing stock.

Councils should:

- Assess the current energy efficiency of their council house stock (if this has not already been done) and raise it through the simple measures above
- Encourage housing associations to do the same.
- Publicise their results to encourage private house owners to do the same

## Recommendations

If we are serious about the climate emergency, we have to deal with housing.

Councils should, in our view:

1. Treat the NPPF targets as a maximum and reduce them when new evidence becomes available
2. Require that embodied carbon be measured in all new housing development and, when the Building regulations allow it, mandate the use of sustainable materials
3. Switch their own electricity source to green suppliers
4. Encourage the development of alternative green sources within Somerset.
5. Assess the energy efficiency of their own housing stock and raise it.

Sources:

Green building Council for overall impact

National House Builders Federation for housing assessment

Tree sequestration from Forestry Research

Hedgerow sequestration from the Irish Environmental Protection Agency

Business, Energy and industrial strategy Committee

## Appendix 2.

### Housing targets

The previous Taunton Deane plan has failed to deliver on its two key objectives:

- The economic development strategy has failed to deliver the high-quality jobs it promised because the strategy of “build it and they will come” was fundamentally flawed from the start and based on far too high a growth rate for the local economy.
- The housing strategy designed to deliver a high number of affordable houses through a percentage of an overall high target has also failed. We do not have enough affordable housing.

The plan for West Somerset and Taunton must not repeat those mistakes. It should focus on what is needed by the people of our area and be realistic about what is possible.

There are two underlying trends which shape the need for housing;

- Economic growth
- Population growth

They are intertwined – population growth drives economic growth; economic growth draws inward migration.

### Economic growth

The long-term growth rate of the UK economy has been 2.1%. Over the period of the plan no growth rate higher than this should be contemplated.

The doubling of the South West economy, the objective of the Heart of The South West group, means a sustained year on year growth rate of 3.6%. As a forecast this is fantasy; as an objective it will be a mountain to climb.

In the last seventy years the longest sustained period of growth in the UK was the nine years between 1999 and 2007 which, of course, ended in the deepest and longest recession since the war. The growth rate in the South West during that time averaged 2.4%.

To allow a fanciful figure for growth to influence future commitments in housing would be the height of irresponsibility. If growth above 2.1% occurs the Council can adjust its housing target upwards.

## Population growth

The NPPF numbers which shape our housing targets are effectively handed down to Local authorities by Central Government and are largely based on The Office for National Statistics numbers (ONS) for population.

The Office for National Statistics (ONS) produces population projections every year for the UK as a whole, down to Local Authority area. These are projections, not forecasts, and are based on the trends over the last five years for births, deaths and inward migration. They are very likely to change when the results of the 2021 census come in.

We can take a range of estimates of housing need from different sources:

The 2016 population of Taunton Deane was put at 116,000 in 2016 rising to 134,700 in 2040.

Taken at face value this would mean an extra 8,130 new households (2.3 people per household). (West Somerset grows by only 1,700 people up to 2040). This gives us around **450** households per annum.

Most of this is driven by inward migration. All the people who will be new to the housing market who live in SWT now have already been born (demography is destiny). There are 34,428 people between the age of 0 and 19 in SWT. On the other hand, there are 35,013 people over 65 years. 90% of these people will die before 2040.

This would give us an additional 1,400 households over the period until 2040, **70** households per annum.

The economic analysis commissioned by the Taunton, Mendip and South Somerset councils in 2016 had a range of estimates:

The top estimate was for **512** houses per annum for Taunton Deane.

The average number of completions on new homes over the last ten years is **640** per annum.

The climate emergency objectives would mean **zero** new houses unless they can be built to zero embodied carbon standards.

The NPPF figure at **702** is itself unsupportable by any reasonable estimate of growth. We should accept it only because we have to, so as to avoid challenge from developers, but it should be the maximum number.

The House of Commons Public Accounts Select Committee had this to say about the Government target:

“The Government has set itself the highly ambitious target of building 300,000 homes a year by the mid-2020s – levels not seen since World War two - even though there is no clear rationale for this figure and the Ministry themselves say only 265,000 new homes a year are needed.

## Affordable housing

The total numbers aside, it is clear that affordable housing is an issue in the area. Since 2012, the price of housing in Taunton for first time buyers has risen by 25%.

We have one independent study of the need for affordable housing-The Strategic Housing Market reported in 2016. This study forecast a need for 161 affordable rent dwellings each year for Taunton Deane, 76% of which were for Social Rentals

Over the last three years the breakdown of affordable housing for Taunton Deane is:

- 205 social rent
- 20 at 80% market rent
- 105 shared ownership etc.
- 4 private rent

For the various types of shared ownership, borrowing up to 95% of the value, even with the 20% interest free for the first five years, is only possible so long as interest rates stay at their historically very low rates. Any significant upward move in interest rates will lock buyers into negative equity.

**We are storing up serious social problems by continuing to promote this type of ownership.**

The Councils target for affordable housing has been 25% in Taunton Deane and 35% in west Somerset. In the context of overall house building of 2,313 over the last three years, affordable housing represents only 14% of total housing built and Social Rent is only 9% of the total.

**The model of subcontracting the delivery of affordable housing to the large developers is not working. The returns demanded by them for “viability” are too high. At the current rate of delivery to build 161 affordable dwellings would mean allowing 1,150 dwellings per annum.**

We would be better focussing on the direct delivery of social housing using land already owned by the public sector. Other councils are creating new ways of working which deliver better designed, more spacious homes built to sustainable standards by creating owned companies to do it for them. Bristol, Croydon, Bournemouth are all examples. Using an arms-length company means that SWT can be in control of the pace and shape of development without falling foul of the Right to Buy rules.

## Viability

The various objectives in the plan, for affordable housing, for Future Homes Standard, for design and for infrastructure will not be possible to reconcile with developers' viability. The NPPF says:

“For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. “

For anyone involved in normal business these are extraordinarily high returns. For building they are so high as to make loading extra requirements on developers doomed to failure.

**It is our view that, unless the Council removes affordable housing from its relationship with developers and builds it directly, none of the other objectives will be realised. It is not a matter of trade-offs. It simply will not work.**

## Sources

Land Registry for house prices

ONS for economic and population growth

Housing and Employment Land Availability Report

Somerset Housing Market Assessment

## Appendix 3.

### Economic Development

The objective of economic growth in SWT area should be on developing the quality of work available:

- The unemployment rate is already low and below the UK average
- Earnings are below the average for the UK

**We don't need more jobs; we need better ones.**

"Build it and they will come" is unlikely to deliver on that objective. We need an economic development strategy that is based in some comparative advantage of our area and policies to support it.

The basis for a good strategy is:

- A "natural" comparative advantage
- Deliberately building a cluster

#### Somerset West and Taunton comparative advantage

Inward migration shows that our area is most attractive to the late middle aged. Most of these people will be coming from the cities and the South East in pursuit of a better quality of life offered by towns surrounded by beautiful landscapes.

This group is generally seen as a problem because, as they grow older, they will have more need for social and health services. They are, in fact, an advantage:

- They have the most disposable income
- They are the best market for travel, for outdoor clothes and equipment, for organic food, for artisanal products, for green energy products
- The most successful business start-ups are started not by 27-year olds but by people between 47 and 53
- 51% of the business angels, who invest in start-ups in the UK, are over 55 and most of those are over 65

The evidence of these people as a market is all around us in the farm shops, the wine shops, the craft shops, the riding stables and so on.

Entrepreneurial development from this group is not so obvious (apart from working from home). There are relatively few investable opportunities

However, the home working shows the advantage of the area - its very good communications, particularly for Taunton and the villages surrounding it:

- The M5 puts the industrial centres of the Midlands two hours away
- The railway now puts London two hours away

In practise these are better times than Bristol, Bath and Exeter because of the ease of access.

In our view SWT should be encouraging this trend. The policy emphasis should be on:

- communication development particularly broadband speeds
- small-scale office and workshop spaces
- extension of the railway network to Wellington with a new station and the integration of the West Somerset Railway into Taunton

## Building a cluster

The most successful development strategies in the UK are where authorities have supported the development of a cluster of similar businesses. They range from Milton Keynes where the emphasis was on distribution, through London Docklands where the emphasis was on financial services to Cambridge where emphasis has been on supporting the science of the University. Each of these would have happened anyway but nothing like the extent to which they have without the active encouragement of the local authority (and Central Government).

SWT's focus has to be on creating a cluster since no obvious one exists. The focus on climate has probably the most potential.

- It fits with the landscape advantage,
- businesses in the green markets are likely to be run and staffed by people with a love for the outdoors;
- no local authority seems to have grasped it as yet and it is a natural extension of the climate emergency;
- it will grow.

We will need to be proactive:

- work with EDF, nuclear is not fashionably green but it is established and EDF has a need to burnish its green credentials
- be among the first to adopt hydrogen as a significant part of the energy mix and look to take it green
- look proactively for onshore wind sites, small-scale solar sites and energy from the watercourses
- integrate district heating into the council house developments we should be doing
- work on new drainage systems

If we do all that and talk about it, we should attract companies interested in being involved.

Sources

ONS

Harvard Business Review for entrepreneurs

UK Business Angels Association

## Appendix 4.

### Sustainable locations

Taunton's comparative advantage as a place to live against Exeter, Bristol and Bath is not in the quality of its housing or the vibrancy of its economy but in the nature of its landscapes. Somerset West and Taunton is defined by its landscapes.

Protecting those landscapes needs to be at the heart of the local plan.

It is the nature of AONB that most of the statutory protection goes to the hills, but it is the valleys which frame them and give them context which make them beautiful. The valleys are where the people live and where the smaller villages are. The character of the district is defined more by the villages than it is by Taunton, Wellington or Minehead.

There is currently little protection for those valley landscapes beyond the settlement boundaries and the open landscape designation in the planning rules.

**The maintenance of defined settlement boundaries and of open countryside is a crucial barrier to irresponsible development of villages particularly in the areas close to Taunton. Abandoning them is a charter for uncontrolled development.**

Most of the relevant valleys are already recognised in the Landscape Character Assessment for Taunton Deane. The same should be done for West Somerset and the most sensitive areas should be given a designation of Areas of High Landscape Value. While this would not offer legal protection, it would signal the council's understanding of the importance of all the landscapes in the character of the District.

The valley covered by the parishes of Stoke St Mary, Neroche, Corfe and Pitminster – the Blackdown Vale - is the largest of these valleys in the district and the one under the most pressure from development. It should be designated an Area of High Landscape Value.

### Sustainable Villages

Sustainable villages need Taunton to thrive as a place to work, to shop, for schools and a place to access higher level health care. They also need Wellington and Minehead to be centres for the same services.

If that is delivered the capacity of villages and smaller settlements to thrive has changed. The internet has enabled:

- Remote working
- Remote purchase and delivery of almost any product especially groceries
- Remote delivery of services
- The reduction of isolation particularly of young, but also of elderly people, through social media

In the process it has left some groups (the poorer in particular) more isolated and some services, in particular health services, more difficult to access.

In practice, and contrary to the impression in this section of the draft plan, most villages are in rude health. Isolation is, in any case, relative. Of the 25 small villages in the SWT area all but 5 are within six miles of Taunton, Wellington or Minehead.

The main problem is in providing flexible and financially accessible transport to those villagers who lack their own and improving access to the web for those whose access is restricted.