

**From:** [Janet Russell](#)  
**To:** [Thompson, Graeme](#); [Povall, Sarah](#)  
**Cc:** [Philip White](#)  
**Subject:** Hestercombe Gardens Trust  
**Date:** 12 March 2020 12:59:53

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Dear Ms Povall and Mr Thompson,

Please find attached a response to the above document from our Chief Executive, Philip White, which highlights the areas of particular concern to Hestercombe.

Kind regards  
Janet Russell

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**Janet Russell**  
**PA to Philip White MBE**  
**Chief Executive**

(Usual work days Tuesday, Wednesday  
and Thursday)

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## TO WHOM IT MAY CONCERN

Thank you for the opportunity to review the Somerset West and Taunton Local Plan 2040 Issues and Options document. Having carefully read this consultation document, the concerns of most importance to Hestercombe Gardens Trust are given in red below. Rather than complete the questionnaire, we would refer to the points in the Taunton Deane Borough Council Adopted Core Strategy 2011-2028 of particular relevance to Hestercombe and the Habitat Regulations Assessment November 2019, and comment that we hope these points will continue to underpin the new Local Plan for Somerset West and Taunton Council:

### **1. Protection and enhancement of the habitats surrounding Hestercombe House SSSI/SAC and the wider feeding area for the European endangered population of Lesser Horseshoe Bats**

It is clear that the foraging area of the bats has been considerably compromised by the housing developments of Monkton Heathfield and Staplegrove. Tree planting on its own is insufficient as the bats require a wide range of habitat types including woodland edge, open water and unimproved grassland. Planting a 20 metre strip of trees around a new housing development is clearly insufficient.

(ref. **Local Plan 2040** p. 4 Sustainability Appraisal and Habitats Regulation Assessment; p. 12 Objective 7. p. 36. 7b/1, 7b/2, 7b/6, 7b/9, 7b/10. P. 42 Environmental quality. P. 43 10b/10)

(ref. **TDBC Adopted Core Strategy 2011-2028** p. 53)

“Bats Populations and Development

3.125 In addition to the Bat Consultation Zone, British bat species are widespread in Taunton Deane and may be using habitats and roost sites anywhere in the administrative area. As a ‘competent authority’ under the Habitats Regulations the Borough Council is responsible for ensuring that populations and distribution of bats are maintained at a ‘Favourable Conservation Status’ as defined in Article 1 of the Habitats Directive.

3.126 In order to aid the Borough Council in reaching a decision on an application that potentially affects bats, material consideration of the implications of the development on bat populations and their distribution will be required in order to show that these are not adversely affected by the proposal.”

(ref: **TDBC Adopted Core Strategy 2011-2028**, pp.83-85)

“5.2 Priorswood / Nerrols

- “A country park within the green wedge between Priorswood and Monkton Heathfield, including part of the green link between Halcon and the Quantocks;”

- “A multi-purpose ‘green necklace’ surrounding the settlement providing allotments, outdoor recreation and wildlife habitat. This will also include:
  - A 20m wide buffer of woodland planting around the boundaries facing bat activity from Hestercombe House SAC; and
  - Off-site offset habitat in accordance with the recommendations of Hestercombe House SAC Appropriate Assessment to compensate for the loss of habitat of lesser horseshoe bats. The off-site offset habitat should be functional prior to the commencement of any development...”

“5.30 In allocating this site the impact on landscape and the ecological value of the site have been carefully considered to ensure that impacts on protected species known or expected to be present on the site is minimised and mitigated where appropriate. Of particular note, are the foraging areas and routes of Lesser Horseshoe Bats from the Hestercombe House SAC and provision of compensatory habitat for this species, and possibly others, will be a prerequisite of development. This should be done in accordance with the recommendations in the Hestercombe House SAC Appropriate Assessment (2009) and Core Strategy Policy CP8. It should be noted that the area of off-site offset planting has been recalculated since 2009 according to revised site allocation boundaries and the latest survey data.

(ref: **TDBC Adopted Core Strategy 2011-2028** p. 102)

“5.71 Land assembly issues prevent the western area being brought forward as a co-ordinated development for at least five years. The eastern development area is subject to foraging by lesser horseshoe bats from the Hestercombe House SAC. The Hestercombe House Appropriate Assessment requires off site woodland planting to be established and sufficiently mature to provide replacement foraging for the bats before the eastern area can be developed. A potential area for this new woodland has been identified and agreed with the National Trust who are one of the landowners in the eastern area.”

(ref. **TDBC Adopted Core Strategy 2011-2028** p. 47)

3.104 The NPPF sets out the Government’s planning policies for the delivery of sustainable development through the planning system. It states that planning should facilitate and prompt sustainable urban and rural development by protecting and enhancing the natural and historic environment and the quality and intrinsic character of the countryside, protecting and enhancing valued landscapes, geological conservation interest and soils. This is reflected in Core Strategy policies which seek to preserve and enhance the environmental qualities of the borough.

3.105 The NPPF sets out national policy relating to biodiversity. It seeks to ensure that planning and development should have minimal impacts on biodiversity and enhance it wherever possible. In particular, it requires that the Core Strategy should identify areas or sites for the restoration or creation of new priority habitats which contribute to national and local targets and the restoration or creation through appropriate policies.”

“3.113 Landscape Character Assessments have been prepared for Taunton’s Rural-Urban Fringe (2005) which assesses the potential capacity to accommodate growth around the town and Taunton Deane Landscape Character Assessment (2011). Taunton Deane exhibits considerable landscape variety, with 16 landscape types that have been sub-divided into 22 character areas. The assessment outlines key national and international conservation and landscape designations and any adverse impacts which could result from development. These designations are outlined below.

- International conservation designations: The nearest SAC is Hestercombe House. There are no SPA or Ramsar sites in proximity to urban areas;...”
- “National conservation designations: It is not anticipated that any development proposals would adversely affect any SSSI designations.” **This is clearly incorrect.** See ‘Local Plan 2040 Habitat Regulations Assessment November 2019 point 44 “The Hestercombe House lesser horseshoe bat maternity roost consists of two components: one is the roost site in the house, and the other is located in the stable block. The former roost continues to show a decline in numbers of bats and is an ‘unfavourable declining’ condition...” and point 48 “The main factors considered to potentially cause loss or decline in Lesser Horseshoe bats from the policies in the Local Plan include: a) Loss or degradation of foraging habitat result in a reduction of food availability, particularly through loss of pasture and woodland but also other prey supporting habitats...”

### Green Infrastructure Strategy

“3.115 Taunton Deane Green Infrastructure Strategy (2009) assesses the need and demand for green infrastructure in relation to open space and access, access links, landscape, ecology and biodiversity, cultural heritage, flood risk management and socio-economic issues. It defines green infrastructure as:...”

- Protect habitats and species, including those listed in UK and Local Biodiversity Action Plans, and conserve and expand the biodiversity of the Plan Area; and....”)

(ref: **TDBC Adopted Core Strategy 2011-2028** p 83-84)

- Development of this site [Nerrols] will involve building on high grade agricultural land, but the other benefits of the site are deemed to outweigh the resultant loss of this land use.”

## **2. Cycle and foot path access from Taunton**

The local plan should specifically mention connecting Taunton and the Country Park with Hestercombe and the Quantocks with footpaths and cycleways as a clear objective. This will reinforce the status of the green wedge, encourages environmentally sustainable forms of transport and, by giving easy access to the Quantocks AONB, promotes health and well being.

(ref. **Local Plan 2040** p. 32 “The Local Plan will ensure that the detailed design of all new development encourages people to walk and cycle with clear, safe and direct walking and cycling routes to shops, services and jobs. We will expect new development to contribute to improved bus routes as it can take many years for a new route to fund itself.”)

(ref. **Local Plan 2040** p. 12 Objective 6. P. 39. 5.9.1. “It is also important that everybody is able to safely navigate their local communities and towns. The highway (footpaths and roads) and the public realm should be designed to be safe and accessible.”)

ref. **TDBC Adopted Core Strategy 2011-2028** pp46-47

“A new Priorswood country park is proposed to be provided as an integral part of the urban extensions at Monkton Heathfield and Nerrols. New green links are proposed from the town through the existing green wedges to the Quantock Hills AONB to the north and the Blackdown Hills AONB to the south. Developments will be expected to adopt Natural England’s Accessible Natural Green Space Standards (ANGSt) and contribute to realising the opportunities identified within the Taunton Deane Green Infrastructure Strategy.”

“Development will need to mitigate and where necessary, compensate for adverse impacts on landscape, protected or important species, important habitats and natural networks, river and ground water quality and quantity so that there are no residual effects.”

Development outside of settlement boundaries will be permitted where it will:

- Protect, conserve or enhance landscape and townscape character whilst maintaining green wedges and open breaks between settlements; and
- Protect, conserve or enhance the interests of natural and historic assets; and...”

### **3. General view protection from Hestercombe House, Gardens and wider estate, and more generally of the Hestercombe Conservation area.**

Hestercombe comprises a Grade 1 historic landscape on the Historic England Register of Parks and Gardens; it extends to nearly 400 acres on the southside of the Quantock Hills. There is no mention in the Local Plan of Hestercombe being a Conservation Area.

Hestercombe appears to be under attack as its views south over Taunton and the Vale have been severely compromised by the building of new developments at Monkton Heathfield, Nerrols 1, soon to be Nerrols 2 and the proposed Lyngford Lane development. No recognition or mitigation appears to have been enforced by planners of the adverse impact of these new developments and, in particular, of **roof colour** which causes the new buildings to dominate the landscape. Red concrete roof tiles have been allowed which do not weather and create an eyesore rather than the

grey slate colour that is the general roof colour of Taunton and which, at a distance, merges into the surrounding landscape

Large steel framed buildings and commercial sheds with silver and light coloured roofs have been allowed instead of the recommended roof colours of browns/ dark grey which would have prevented them being so conspicuous and, worse, acting as light reflectors thereby dramatically increasing their impact on views from the historic landscape and surrounding hills.

There appears to have been a complete lack of awareness of the detrimental effect of having to look down on buildings with poorly considered roof coverings.

(ref. **Local Plan 2040**. p. 34. 5.7.3. Issue: “The setting of these landscapes is however under considerable pressure with development encroaching closer to their boundaries. Statutory Management Plans are in place and are revised every 5 years. The Local Plan area adjoins Exmoor National Park so the impact of development on the setting of the national park is also important.”

p. 35. 5.7.4 Sustaining and enhancing the significance of our built heritage. “The historic environment contributes to our sense of identity, knowledge and understanding. It is valued and should be protected from unauthorised demolition, alteration or extension because of its cultural significance, special architectural features or historic interest. Effective management of the built heritage requires a clear understanding of what makes a place significant and how that significance might be vulnerable.”

(ref: **TDBC Adopted Core Strategy 2011-2028** pp 49-50)

#### “Green Wedges

3.110 The protection of green wedges has long been an important part of the planning policy framework for Taunton and Wellington. These will continue to contribute environment-led planning for the future. Key policy objectives of Green Wedges are to:

- Prevent the coalescence of settlements and maintain a sense of place and identity for neighbourhoods
- Maintain the open character of a green lung contributing to health and wellbeing for residents;
- Bring the countryside into the heart of town
- Provide accessible formal and informal recreation, sport and play;
- Provide valuable wildlife corridors and habitat;
- Protect areas of landscape importance and visual amenity; and
- Provide a positive approach to land use.”

(ref. **TDBC Adopted Core Strategy 2011-2028** p. 110)

“6.6 The visual impact of new development has been a significant concern of planning for many years. Whilst the design of development is covered in policy DM5, the principle of development on a particular site will have visual implications. The need to protect the character of the environment applies throughout Taunton Deane and policy DM1 should be read in conjunction with other policies such as CP8.”

(ref. **TDBC Adopted Core Strategy 2011-2028** pp.83-85)

- “A well defined green edge to the urban area that protects views from Hestercombe House and the Quantock Hills”.
- “5.31 The green wedge, new woodland planting and structural belt of landscaping around the site will enhance the setting and the views from Cheddon Fitzpaine Conservation Area. Development of this site [Nerrols] will involve building on high grade agricultural land, but the other benefits of the site are deemed to outweigh the resultant loss of this land use.”

#### **4. Planting trees**

Tree planting as currently envisaged is inadequate. It does not sufficiently address the need of replacement feeding habitat for the Lesser Horseshoe Bats; it is insufficient to protect the historic view from Hestercombe by intrusive housing development and it does nothing to offset the carbon footprint of these new developments or the traffic that they will generate.

(ref. Local Plan 2040. P.36. 7b/12)

(ref. **TDBC Adopted Core Strategy 2011-2028** p. 85)

“5.25 The development of Nerrols will take place in a phased manner. Development plans for the first phase at the southern end of the site which include the local centre, new homes, employment and areas for off-site woodland planting required for mitigating the loss / disturbance of habitat of lesser horseshoe bats in line with the Hestercombe Houe SAC Appropriate Assessment.”

#### **5. Local car parking, particularly with regard to Cheddon Fitzpaine C of E Primary School**

Specifically the lack of sufficient car parking at Cheddon Fitzpaine C of E Primary School means that the road leading past the school becomes at times impassable. It is very dangerous for parents with young children, often also using a pushchair, and it is no exaggeration to say that there is a very real danger that someone will be seriously hurt by oncoming traffic trying to get through the melee. I have myself seen a child knocked off his bike by a van after leaving school who was later hospitalised. Resolving this totally unacceptable situation should be a priority.

General provision of adequate car parking, the changing nature of cars and the development of electric cars and the essential provision of recharging points have not

been addressed in the Local Plan leaving it in the position of being out of date before it is even published.

12<sup>th</sup> March 2020

Philip White,  
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