

From: [Dianne Shirazian](#)
To: [Strategy](#)
Cc: [Alister Smith](#)
Subject: Mrs J Butterly
Date: 16 March 2020 12:05:06

Dear Sir / Madam

**Representations on Local Plan 2040 issues and options document
On behalf of Ms J Butterly**

Please see attached a letter from Stags Planning Consultancy on behalf of our client Ms J Butterly, together with a location plan, and we would be grateful for an acknowledgement of safe receipt.

A hard copy of this letter and location plan will be posted out to you today.

Regards
Stags Professional Services Planning Consultancy



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Our Ref: AS/DPS

16 March 2020

Somerset West and Taunton Council
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TA1 1HE
By email to strategy@somersetwestandtaunton.gov.uk



stags.co.uk

Dear Sir/Madam,

**Re: REPRESENTATIONS ON LOCAL PLAN 2040 ISSUES AND OPTIONS DOCUMENT
ON BEHALF OF MS J BUTTERLY**

I am writing to you on behalf of our client, Ms J Butterly of Bickley Farm, East Nynehead, Wellington, Somerset, TA21 0DA. Our client has asked that we raise the following with the Council with regard to the Local Plan 2040 Issues and Options document.

Our client is a long-standing member of the East Nynehead community and runs a relatively small (in wider agricultural terms) but successful commercial soft fruit farm, which sells fruit to a major UK retailer and the general public. As both a member of the local community and a rural business owner, our client has some fundamental concerns with the apparent direction of travel of the Local Plan 2040. Given the early stage of preparation, our client considers that there is ample scope for the LPA to reconsider its approach to deliver a better balance between rural and urban growth.

Despite having a population density twice that of the County average, the former Taunton Deane area is firmly a rural District (circa 86 % being farmland) with a number of small settlements dispersed across the former borough. When combined with the former West Somerset area, the rural urban balance is even more firmly tilted in favour of rural land use. With a largely rural makeup comes the common economic and housing issues associated with such areas, and the new Council area is far from immune from declining populations of younger people and the need to provide new jobs to meet those no longer found in the agricultural sector. Our client is therefore extremely concerned that the Council appears to be taking a very urban and larger settlement centric direction of travel with regard to these issues, and in particular housing, in the emerging Plan.

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With particular regard to the Section 5.2 *Sustainable Locations*, whilst our client applauds the Council for looking to achieve sustainability objectives, it is her opinion that the approach being taken is misguided. Sustainability is not just about location and the potential reliance on the private car, and the Framework is clear in defining that there are social, economic and environmental branches to sustainability and the first two branches cannot simply be set to one side in favour of the latter.

Whilst the need to take-action to limit climate change is fully appreciated, the Council's assumption appears to be that by primarily focusing growth on larger settlements this will solve this issue. This is plainly not the case and we would urge the Authority to look at improving public transport links across the area to provide a viable alternative to private car use. Furthermore, the Council appears to fail to recognise that the UK is well on the path to reliance on vehicles powered by means other than the internal combustion engine. In addition, and as highlighted by the current virus outbreak, working from home is becoming a far more viable option for many people. The Rural areas Select Committee on the Rural Economy – 'Time for a strategy for the rural economy (2019)' notes that rural areas already host a significantly higher number of home workers (22%) than urban areas (13%). The Council should not therefore automatically assume that rural housing growth will in turn generate significant additional reliance on the private car.

With regard to housing in rural areas, the government continues to recognise that housing is required in rural areas to drive vitality, and Paragraph 78 of the Framework states:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."

We would further draw attention to the fact that the government recognises, despite the NPPF seeking to foster rural development, this is often failing to be delivered at a local level. The previously referenced 'Time for a strategy for the rural economy (2019)' contains an entire chapter on Rural Housing (Chapter 5) which we will not repeat here, but we would draw attention to the following quote found in the Summary to the report:

"There is a shortage of housing of the right types and tenures, particularly for the working age population, and more support is needed for sensitive, well-designed development on small sites in village locations."

It is clear that appropriately scaled development in locations such as East Nynnehead could help support facilities and services in larger villages like Bradford on Tone without solely putting development pressure on such larger villages. We believe that the LPA should consider the proactive approach taken by

Cornwall Council with regard to delivery growth and maintaining vitality in rural areas as a good example of how the different elements of sustainability can be balanced. We would specifically refer the Council to Policy 2 of the Cornwall Local Plan which seeks to allow proportionate infill or rounding-off growth in all settlements.

Our client has asked us to draw particular attention to the site edged red on the enclosed plan as a good example of the type of small village site, where small scale infilling with 2-3 units would help drive vitality in the surrounding area. Such sites could, in particular, be brought forward as self-build plots, which would help meet objectives to deliver intermediate affordable housing in locations where people want to live. On this point in particular, we would commend the Council for considering how to increase the supply of sites for self-build housing, though we would caution against solely focusing on delivering self-build plots on larger sites, as these are often not the type of location that those interested in building their own home are seeking.

With regard to the specific questions raised by the Council relevant to our client's concerns, these are largely addressed above, but for completeness we will answer a number of questions specifically below.

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

We believe the Council needs to allow for some proportionate growth within Tier 7 with criteria-based policy approach being sufficiently flexible to permit this.

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

We are of the opinion the Council need to better link the provision of housing growth in the rural areas with job creation, as without a coherent approach, it is hard to see how the economic objectives for rural areas (however they are sought to be addressed) will be met.

Question 8a: Should we keep or remove settlement boundaries? Or should we have settlement boundaries in areas where there is higher pressure from development i.e. closer to Taunton, Wellington and Wilveliscombe but remove them in more remote areas to provide more options for development.

It is our view that the use of arbitrary 'black lines' to define where development is considered acceptable is an outdated approach and does not reflect the Framework. In our view it would be unacceptable to have a hybrid approach, as the definition of 'remote' would be open to significant interpretation. Locations such as East Nynehead are unlikely to be 'remote' but can still experience negative impacts from being overlooked in delivering proportionate growth. We would strongly advocate the Council developing criteria-based policies that are sufficiently flexible to allow appropriate scaled growth in all settlements right through to those in Tier 7.

As a concluding remark we draw the Council's attention to the following quote from the Select Committee in the aforementioned 2019 paper:

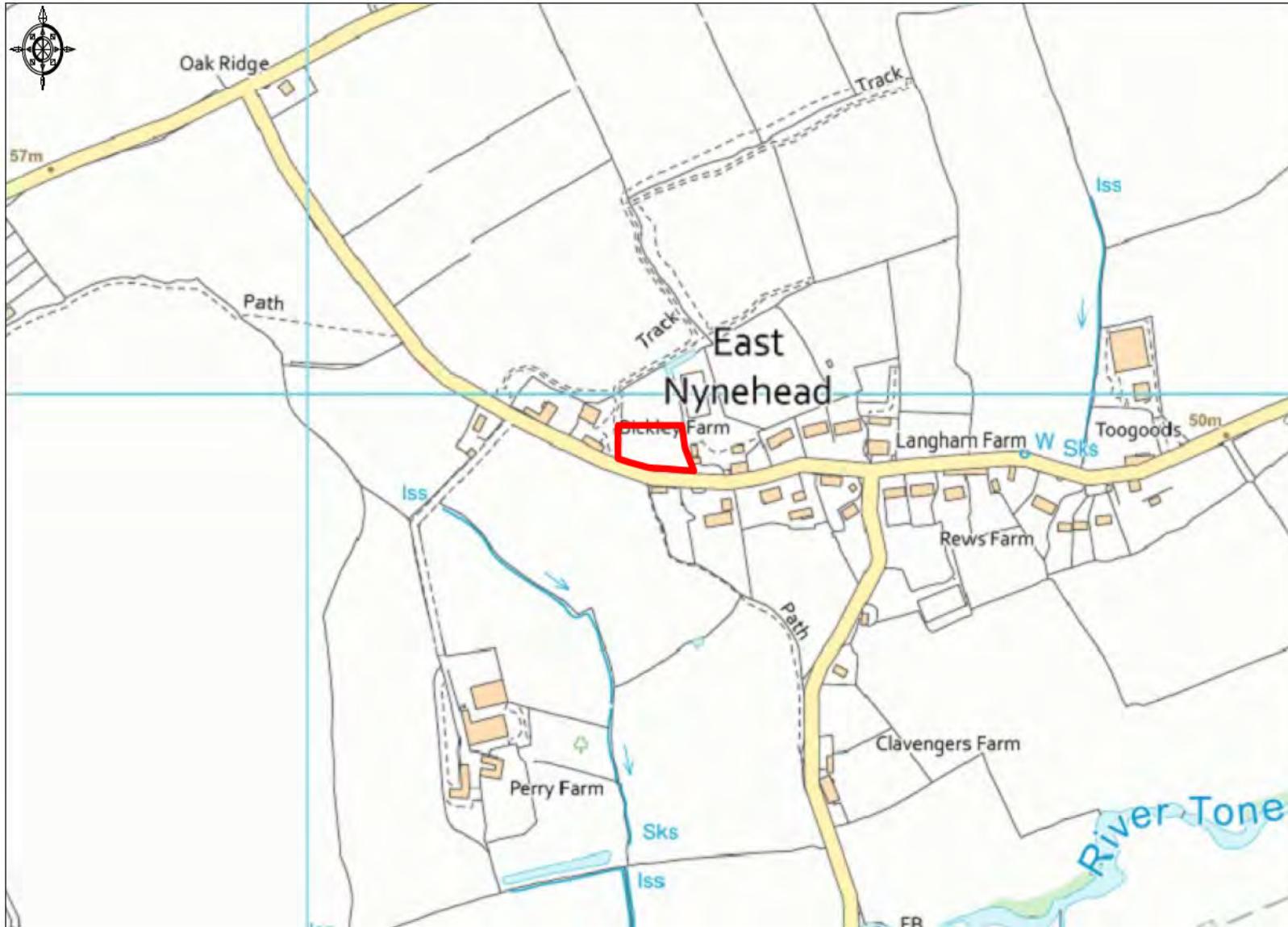
"We heard evidence that, despite positive intentions, the planning system more generally is not working as it should in many rural areas. The new National Planning Policy Framework has been welcomed for its new references to rural housing and the rural economy, and for introducing greater transparency to the "viability assessment" process. It still, however, received some criticism for failing to highlight the importance that should be given to the development of new homes in smaller outlying settlements."
(own underlining)

We therefore urge the Council to consider a fresh approach to how they address enhancing vitality in the rural areas at this early stage in the plan formation process.

Yours faithfully



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