

**From:** [REDACTED]  
**To:** [Strategy](#)  
**Subject:** Tim Dyer  
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Dear sirs,

I want to submit the attached as my consultation feedback on the Local Plan 2040 Issues and Options January 2020 document. Rather than fill out the questionnaire I have commented on the text of the document and the questions that were asked (where I had an opinion).

If you have any questions about my views please feel free to get in touch.

regards,  
Tim Dyer MSc, BEng  
Langford Budville

## Local Plan 2040 – Issues & Options Consultation Document – Tim Dyer comments

'1.15 Carbon Neutrality by 2030, This is an unbelievably difficult task. In order to meet this target the whole of Government, industry and society essentially has to cease all carbon release and develop significant carbon capturing activities in 9¼yrs. If the SWaT team and residents are serious about this then targets and actions need to be: Urgent; decisive and effectively expedited and policed. Within this statement the target should also recognise the pollution and waste problems we face.

'1.17 “Legally required to make sure that...” implies that all new development be carbon neutral, if not carbon negative. All aspects of the plan should reflect this.

'1.18 Wholly agree with this section

'1.19 “..must be..” is potentially at odds with section 1.17 and 1.18 unless NPPF is fully in line with zero carbon aspirations. If not, it must be made clear which clause takes priority.

'3.2 Line 1 should read “..have good access to the 'road' transport network.” Wellington still requires the rail station restoring, and the cycle network is not fit for purpose. Line 3 should read “This has 'in part' influenced how..” Also influenced by government policy, historic cuts and removal of public transport services.

'4.0 Objectives: I am concerned that actions required to get to a carbon neutral, zero pollution are not fully covered by these objectives. How do we make the changes that are needed but which are not part of 'new development'?

Obj1 “work towards” is vague and not forceful. This should be something like “all new development, in its part, achieves...”

Obj3 wording should be “high quality affordable zero energy homes....” not either / or, but all of these things. Refer to corporate strategy theme two where high quality and affordable are not seen to be separate options.

'5.1.1 2025 is too late to be aiming for zero carbon in new builds: the technology exists and there has been plenty of time for developers to introduce it but it has been resisted for economic reasons. 2030 is not very far away and there is still the huge task of dealing with emissions from existing houses. Rather than talking about what end date we should 'aim' to achieve something why not insist all available low energy techniques be adopted immediately and then work from there. Pass the responsibility to the developers who have been so slow to adopt these technologies and in the meantime have been making obscene profits. I totally agree that offsetting should be the last resort, but it is not either or. We need everything, all at once to tackle this 'emergency'. Question 1a seems irrelevant – we have to just get on with it. It would be good to include sustainable / recyclable / non-polluting / low embedded energy materials, energy of the building phase, and pollution & waste into the statements on new developments.

'5.1.2 Option 1b, Choice of site of Renewable Energy equipment for an efficient scheme is very sensitive to technical influences. Site choices should be driven by technical merit and practical considerations. This suggests ii) is a better approach, but a mix of both on a case by case basis is probably sensible. Perhaps schemes could be recommended to the Council in a similar fashion to the “call for sites” for housing. Recommend encouraging community schemes to ensure buy-in, start at Parish level?

Policy approaches of Obj1, 1c/6 Means must be found, incentives put in place, to actively and positively encourage a shift back to Local food production by farmers (and also by residents). Diversification should be points based where it should be more likely to be allowed if it has a positive impact on, and meets the needs of, the local community and environment. For example garage workshop units or other potentially polluting activities are not appropriate for a farm location and may be better regulated if sited elsewhere. Diversification involving products or services of direct use and with customers locally would be more appropriate.

'5.2.1 Agree with para 2. Cycling and walking routes must be efficient and safe to allow viable commuting and not deter less experienced users. One way of stimulating the switch to cycling / walking is to ensure that the routes are such that the time taken by these means is less than if one were to drive. This requires routes to be streamlined with few crossings and junctions, not just tagged on to a development as an afterthought. Existing settlements should be encouraged, assisted and empowered to adapt their roadways and rights of way to provide solutions to these transport aspirations. I'm sure you will find there is a will within most communities to do this.

Locations for development: It is my view, based on recent discussions concerning polar melt rates and their affect on mean sea levels, that no new development should be allowed below 10m above current sea level datum, and no 'key-infrastructure' development considered in the region between 10m and 60m. Tier 3-7 development should take this into account.

'5.2.2 Question 2c, Development should be more carefully balanced against local infrastructure: schools; surgeries; shops; food production; leisure; transport capabilities, i.e. growth in housing stock, where viable, should be managed according to the requirements of local employment and services. If there is no work then building a raft of new houses just leads to a traffic increase as everyone commutes elsewhere.

iii) If this is true then it is fixable.

iv) Rail station alone does not make up for employment, services and infrastructure limitations of Wellington.

v) This makes sense but it seems that Williton does not have the services to cope with a stack of extra housing. A commuter bike route is required to link Watchet and Williton and also both with the other employment areas such as Hinkley and Minehead.

vi) The M5 corridor ought to reduce in importance if local economy and a shift away from road transport is achieved.

'5.3.1 final para: "does not make development unviable" Surely it is a requirement and the developers should absorb it, perhaps by reducing their profit ever so slightly.

Option 3a, I favour the minimum figure. The extra ~6000 houses makes meeting the zero carbon target and providing functional infrastructure even more difficult.

'5.3.2 Are their sites subsidised by the Council Tax they pay? I think only iii) is viable.

Additional Policy Approaches: Objective 3, 3e/1 Reduce this figure from 10 to maybe 3, to stop developers tuning their plans so they end up building 9 executive houses on a plot to avoid the clause.

3e/7 Add a Policy approach to ensure sufficient space requirements within housing developments for individual properties to self-support on garden food growing or allotment space. Permissions must include clauses to protect long term against this land being instantly cashed in by owners to build extensions, garages, or other dwellings.

'5.4.1 para 6. Focus on jobs that can be created in 1) Food production (reduce food miles, transport related carbon and improve resilience); 2) Fibre crop and other raw material production (hemp, flax, willow, softwood forestry, bamboo, maize); 3) Carbon sequestration industries such as nurseries, planting schemes, tree management, woodfuels

Option 4a – both options seem irrelevant based on 5.4.1 para 2.

'5.4.2 Planning development sites to allow shared infrastructure such as district heating; shared admin areas; goods handling and stores; food facilities could allow flexible developments where businesses would be able to grow and expand. Developments of new employment sites must incorporate careful safeguarding of groundwater; waste treatment; run-off handling and prevention of windblown rubbish, and provision should be created for proper policing of these features in existing sites. This is a problem with existing commercial development sites on former green land.

Cycling and walking routes accessing employment sites should be prioritised over other means of transport access to reduce travel time and stimulate commuting by these non-polluting means.

Option 4b I favour i), iii) or iv) as these are less likely to be swallowed up by switching to housing.

'5.4.3 Para 1, Costa and McDonalds. The West-Country is losing its character and becoming just a clone of every other area. Para 2, 'out of town' is driving everyone into their cars. The online shopping problem killing local retail has to be solved and this is a problem for Central Government action to get to grips with, otherwise towns will cease to function. Agree with para 3.

Objective 4c: All approaches seem sensible.

'5.5.1 While developer profits continue to be excessive (and reports locally of renege promises of new infrastructure and upkeep of communal facilities) I will propose that the claims that 'requirements make a development unviable' are unfounded. The business model is distorted. Let's have some social responsibility. The Climate Emergency should take ultimate priority, designing zero carbon houses should be seen as 'standard' and not viewed as a premium product, 'selling for more money', as this passes the costs onto the consumer. We have to change!

Option 5a. Both i) and ii) but with less profit! From bullet points: 1 Carbon Reduction, 2 Strategic infrastructure, 3 Accessible homes.

'5.6.1 Achieving a change in travel behaviour can only be successful if there is local provision of the essentials of life: Food production; employment; community, leading to reduced requirements to travel.

Para 4 should read "so a convenient public transport [and cycle route] network is essential..."

5G is an un-proven and dubious technology, with overstated benefits (are autonomous vehicles really viable or useful in rural Somerset?). Technology will not solve the Climate issue, reduction of consumption is key, business favours technological offerings as they allow more 'stuff' to be sold rather than less.

Fully integrated cycle/walking routes are essential, off highway where at all possible, but certainly prioritised over motor vehicles where appropriate (i.e. anywhere where speed limit is 30 or 20). Minimal crossings and junctions to ensure shortest journey times and ensure viability as an alternative to driving. Secure storage, changing and locker facilities should be provided at key locations and bike parking at all public venues. Road speed limits should be adjusted where appropriate to allow cycle routes to interface safely. Achieving 'major change' will only be possible if we remove barriers to cycling. Survey the public to ask what journeys they do and what barriers prevent them from cycling then put actions to address these barriers into the plan.

Objective 6, policy 6b/1, cycling networks must be: safe; efficient for commuting (i.e. direct); away from motor vehicle lanes to avoid pollution and hazards.

6b/3, as mentioned before, cycle parking must be provided at all journey 'destinations'.

See Annex for suggestions of cycle routes to create to enhance the current network in the SWaT region.

'5.7.1 para 1, suggest "at risk due to climate change [and pollution], specifically..."

para 2, relating to trees in towns.. please add a policy (or modify existing) to give urban trees a greater protection radius from the trunk to prevent their roots being molested during developments nearby. It is common to hear of digger buckets going through tree roots during groundworks.

Question 7a Encourage / stimulate creation of more community woodlands / orchards (fruit and nut).

Sponsored tree planting quota within each community.

All new transport routes should be tree lined.

Allocation of land to create new community allotments.

Stop developers building on green-strip land (eg. By the vets in the Cades Farm development, which was in the Core Strategy 2012 as part of the green strip, but is now to be built on.)

Use hollow-block for large paving / parking areas where appropriate, planted with short crop herbs.

'5.7.2 see comments for 5.2.1 With this in mind it would make sense to 'designate' the whole area of the levels somehow, and manage its reversion to a natural wildlife, commercial crop, and leisure amenity area.

'5.7.3 Light pollution is an increasing problem in the region with many new developments being visible from miles around and from the nearby AONB's. (for example Chelston Budgens). Please make developments use shrouded 'down-light only' street and carpark lighting and make use of time clocks where they are not required all night. Hinkley is a huge light pollution source at night, surely the site could use shrouded lights and timers?

Objective7, policy 7b/1 "Achieving a net gain in biodiversity" would be hugely assisted by the nationwide ban of Glyphosphate based herbicides. Please stop the use of this by Council staff and contractors on Council land, pressure central government to introduce a ban, pressure farmers and the public to stop using them also.

Where section 106 money has been given to the 'community' to fund wildlife related projects, then the community should be granted access (where appropriate) to that area of land to enjoy the benefits.

7b/6 The green-space around Tonedale mill and Town works should be preserved to create a green corridor, linking nicely to the potential canal route green corridor. This could be the beginnings of a country park.

7b/12 I propose it become policy that all hedges that are routinely topped (not those currently being left to mature) should be 'castellated' with a 1m notch cut every 5-10m and a tree planted, which must then be allowed to grow to maturity. The trees should be either hardwoods of a variety useful for materials or fuel (such as oak), or useful fruit-bearing or nut trees. If the hedges are directly adjoining a roadside then low risk varieties should be chosen. This is essentially a way of gaining a huge national forest, without having to find and purchase any additional land - We can start tomorrow!

'5.8.1 Promote rural working hubs, communal workspaces where small rural businesses can share overheads, transport and common business functions.

Option 8a, I favour i) for practical reasons. Settlement boundaries encourage a more focused built area and will result in easier management of services such as sewage and transport.

Rural development should not just focus on new house or commercial building projects, but should seek and prioritise those schemes that positively modify the existing community, with potential for enormous benefits.

Objective 8, policy 8b/1 Rural development projects should make use of local labour, materials, and services wherever possible. Like the 'offset' schemes between countries to keep the wealth in the country of origin – the seller in country B, of a product to country A, has to reciprocate economically to country A by using materials, or services from country A to a certain value, or pay in cash terms. This could be of direct benefit to rural communities.

policy 8b/2 & 3, All rural developments must be closely scrutinised for protection against pollution to rivers and groundwater, and for light pollution.

'5.9.1 para 3, suggested in 5.8.1 note, retrospective improvements to highways, cycleways and footpaths should be included in the scope of Objective 9 developments. Include this in policy 9a/3.

Policy 9a/5, include light pollution considerations

Policy 9a/7, not just Taunton, include other towns: e.g. Wellington and Wiveliscombe...

'5.10 Key Issues: Employment and housing. Bullet point 5: It seems 'viability' is used as a polite way of indicating that the developers are unhappy that profit margins might be squeezed. Specifically with Firepool we have a chance for a really incredible project (which I have submitted comments to Councillors about previously).

How do we prevent more employment sources slipping away to Bridgwater or Exeter?

Question 10a, I think option iii) makes good sense when considered against the aspirations of increased walking and cycling, and the ageing population.

Town Centre & retail Can we reopen the Odeon as a County Town Venue for entertainment?

We must stop adding retail areas to the edges of town while expecting the centre to continue to thrive.

Infrastructure, Sustainable transport corridors. This section should also include existing satellite and more distant communities, not just the three new ones.

I propose that all of the disused rail and canal routes in the region are reclaimed (perhaps compulsorily) for use as cycle / walking commuter and leisure routes. One barrier to cycling for non-enthusiasts is going up hills, and both rail and canal routes are famed for their lack of gradients. They are also very direct and so make excellent commuting sense. Much of the route of, for example, the Great Western Canal from Wellington to Taunton could be easily adopted as a cycleway, and the same goes for the Barnstaple branch line, at least for the section as far as Wiveliscombe.

Many of these routes have footpath rights of way along them presently so only a small change would be required from that perspective. Costs of 'repurchase' should be held to a minimum, as the land came into private ownership relatively recently and probably for a very minimal sum.

The recently voiced (in the Gazette) suggestion that the bus station should relocate to the railway car-park sounds like a very sensible idea.

Environmental Quality Propose officially protected radial green corridors for Taunton of: Firepool, Tone upstream and canal, Vivary to Pitminster, Trull / Sweethay, Kingston, Cheddon Fitzpaine. Similarly chosen strategic sites for other towns.

Cutting traffic is key to air quality improvements. Can we please adopt (like those seen in Portsmouth)

"Cough Cough > Engine off" signs for all lamp stands and posts in the trouble areas, e.g. such as Wellington town centre and the Henlade Queue. We have to discourage single occupant commuting, incentivise car shares or switching to other means. Practical alternatives have to be in place before people will change. All cycle and walking routes in the SWaT network should be reviewed and improved to commuter standard, urgently.

Objective 10, policy extra, Protect with highest priority, the character / unique parts of the town centre to keep the Taunton identity. e.g. Bath place, James street..

'5.11 Key issues,

Bullet point 2, Ancillary facilities – I am concerned that this means out of town retail which will steal trade from the town centre businesses. We already have Budgens food and fuel, and Costa drive-through offering food, no more is required surely?

Town centre b) Northern Relief Road. It is my concern that if this road is too appealing as a route through the town, although it may 'remove' HGV traffic from the town centre, it will result in an increase in HGV's, vans and cars choosing to use this route from the motorway, with knock-on problems along the already stressed B3187 and along the Langford to Wiveliscombe road. It should be designed carefully with these problems in mind.

Heritage Assets c) Parking in the main street also detracts from the town centre experience. Reclaim the streets.

5.12, para1 This suggests that c6000 visitors a week arrive and depart from Minehead Butlins by car or bus (on Saturday). If the steam service, or a linking local train were joined from Bishops Lydeard to Taunton, then some of this traffic could be migrated to rail.

Key issues, It is key to provide a cohesive cycle / walk network between the coastal communities to allow commuting and allow all destinations to benefit from potential tourist revenue. Also a link to key tourist destinations: the Quantocks (a route alongside the steam line), Brendons (mineral line), Exmoor (Minehead to the bottom of Dunkery). This could put the SWaT region forward as a top cycle tourism destination.

## Local Parish Plan

I live in Langford Budville Parish and I have comments that relate to our Parish, but could equally apply to other parish plans. With assistance, I would like us to:

- Conduct a parish audit of all key topics described above, create a Parish inventory of infrastructure, businesses, resources, food producers, skills, energy consumption etc.
- Assess proportion of road traffic passing through Parish daily / regularly
- Transform the Parish into a walking friendly environment, using speed restrictions and other means to reduce the dominance of motor vehicles, and reclaim the roads as community spaces
- Assess Parish car ownership (daily used), and regular journeys
- Introduce key strategic additions and changes to the rights of way to meet objectives set out in this Local Plan
- Create a lift-share / hitching 'bus-stop'
- Assess local electricity network strength throughout Parish
- List all existing RE generation in the Parish (and wood-fuel users)
- Assess further RE resource within the Parish
- Allocate favoured sites for:
  - Community farms
  - Allotments
  - RE development
  - Backup water supply options
  - New housing
  - Tree planting and re-wilding schemes
  - New Commercial activities
  - Bus stops
  - Fibre crop growing
  - Speed limit adjustments
  - Cycle parking
  - EV charge points
  - Extra Community buildings
  - Composting / digestion plant
  - Leisure and Fitness equipment installation
- Create a wish-list for feasibility of proposed development projects, with priority indicated
- Create an action plan for above sites
- Utilise set aside land for community uses
- Add a workshop type room to the village hall to run skills courses and fixing workshops
- Pursue the 'castellated hedge' tree planting idea, and instigate in all Parish hedgerows
- Increase the number of food crop trees in the Parish
- Restore ponds to the landscape where historically removed
- Encourage food growing and rainwater storage by all residents

**Annex: Proposed Cycle Routes to develop for leisure / commuting**

- Introduce routes alongside existing rail lines where feasible, including Watchet to Bishops Lydeard
- Taunton to Blackdowns (create a Vivary corridor route to get to Neroche).
- Taunton to Quantocks (via Hestercombe?).
- Taunton to Wellington link along Grand Western Canal line, spurs to Bradford on Tone, Hillfarance & Oake, Nynehed. Utilise both Firepool and Frenchweir branches.
- Wellington to Westleigh along canal line, spurs to Holywell Lake, Ashbrittle, Langford Budville.
- Wellington to the monument hill (with link to Hemyock possible.. then the rail route Hemyock to Culmstock and Uffculme / Willand).
- Wiveliscombe to Taunton (Barnstaple branch line), with a link Milverton to Langford Budville, spurs to Cotford, Halse, Heathfield, Ford / Fitzhead.
- Chard canal.
- Chard / Ilminster branch line.
- East lyng – Outwood to link the Route3 path to the Tonebank (make Tonebank a cycle route).
- Mineral line from Watchet.
- Link from Mineral line to Combe Sydenham.
- Link top of mineral line to Huish Champflower to get to the Tone path at Washbattle.
- Stawley to Greenham link, to allow continuous route from Watchet to the canal.
- Wiveliscombe via Jews lane to Washbattle.
- West along the Barnstaple branch line, many destinations are possible.. Morebath (top of mineral line), Bampton, Tiverton then Exeter.
- Circular route from West Hatch to Neroche can be made by linking many existing bridlepaths.