



# **WEST SOMERSET LOCAL PLAN TO 2032**

## **LANDSCAPE CHARACTER ASSESSMENT OF POTENTIAL STRATEGIC LOCATIONS FOR DEVELOPMENT**

**Landscape Assessment: Ian Clark, CMLI May 2014**

**Local context: Martin Wilsher February 2015**

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## LANDSCAPE CHARACTER ASSESSMENT OF POTENTIAL STRATEGIC LOCATIONS FOR DEVELOPMENT

### Background & Context

The landscape forms an important influence on the location, scale and, size of development. In 1996, the then Countryside Commission and English Nature published a map identifying and labelling different types of landscape by their characteristics for the whole of England.<sup>1</sup> This was followed up by descriptions of the landscape forms and characteristics by region in 1998/9.<sup>2</sup> Part of the reason behind this was so as to be able to identify different landscape by its function and distinctiveness at a more localised level and to distinguish those landscape areas that did not have the benefit of national designations such as the National Parks and Areas of Outstanding Natural Beauty. Following publication of the 'character map' national planning guidance suggested that Local Planning Authorities (LPA's) take account of this in their local plans, "When they review their development plans, they should rigorously consider the function and justification of existing local countryside designations."<sup>3</sup> West Somerset District Council, along with many other local authority's, commissioned a study<sup>4</sup> to identify the different types of landscape within the local planning authority area at a more localised and detailed level so that this could inform policy making in the emerging Local Plan<sup>5</sup> at that time. The study identified seven different types of landscape character in those parts of the district outside of the Exmoor National Park focusing on four factors that helped to create the individual characteristics of the landscapes. These were; geology, landform & drainage, soils and, wildlife.

The need for an assessment of the impact of proposed future strategic levels of development on the landscape arose from comments made in the Sustainability Appraisal of the Local Plan's Preferred Strategy.<sup>6</sup> This study noted that there was an inconsistency between the way the proposed 'strategic directions of growth' around the three main settlements of Minehead, Watchet and, Williton had been treated in the context of the surrounding landscape. Following the publication of the National Planning Policy Framework (NPPF), it was concluded that the 'strategic directions of growth' did not fully accord with the national advice in terms of the allocation of land for development. Also, the NPPF made clear that future development plans should take account of, "...the natural and historic environment, including landscape."<sup>7</sup>

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<sup>1</sup> Countryside Commission and English Nature; The Character of England, 1996; Countryside Commission; 1996.

<sup>2</sup> Countryside Agency; Countryside Character Volume 8: South West – The Character of England's Natural and Man-Made Landscape (CA 14); Countryside Agency; 1999.

<sup>3</sup> Department of the Environment, Transport and the Regions; Planning Policy Guidance: The Countryside – Environmental Quality and Economic and Social Development (PPG 7 revised) – February 1997; The Stationary Office; 1997; ISBN 0 11 753370 X; p.14 (para. 4.16).

<sup>4</sup> WS Atkins; West Somerset Landscape Character Assessment – November 1999 (Reference: LS/BP3281.001/WSDC/03); West Somerset District Council; 1999.

<sup>5</sup> West Somerset District Council; West Somerset District Local Plan – Adopted, April 2006; West Somerset Council 2008.

<sup>6</sup> ENVIRON; West Somerset Local Plan 2012 – 2032 Preferred Strategy Sustainability Appraisal Report: Non-Technical Summary – February 2012; West Somerset Council; 2012; pp.35 – 37.

<sup>7</sup> Department for Communities and Local Government; National Planning Policy Framework – March 2012; The Stationary Office; 2012; ISBN 978 1 4098 3413 7; pp. 37 – 38 (para. 156).

The Revised Preferred Strategy<sup>8</sup> sought to address the inconsistencies between the contents of the original Preferred Strategy<sup>9</sup> and make it NPPF compliant. The Council commissioned a study to investigate the potential impact on the local landscape of the newly defined strategic development sites used in the Revised Preferred Strategy. These had been slightly modified in the later consultation version to take account of the findings arising from the Habitats Regulations Assessment on the original Preferred Strategy,<sup>10</sup> particularly in relation to the identified land south of the A.39 at Minehead and Alcombe.

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<sup>8</sup> West Somerset Council; The West Somerset Local Plan to 2032 Revised draft Preferred Strategy – June 2013; West Somerset Council; 2013.

<sup>9</sup> West Somerset Council; The West Somerset Local Plan 2012 to 2032 Draft Preferred Strategy – February 2012; West Somerset Council; 2012.

<sup>10</sup> Somerset County Council; West Somerset Local Plan to 2032 Draft Preferred Strategy: Habitat Regulations Assessment – January 2012; West Somerset Council; 2012

## **The Study**

### ***Methodology***

To assess the significance of the visual effects of the housing sites identified in the West Somerset Local Plan to meet its housing requirements, the following document has been used as an integral part of the process; Guidelines for Landscape and Visual Impact Assessment (with particular reference to ‘Assessing the significance of visual effects’ page 113).<sup>11</sup> This comparative landscape and visual impact assessment has looked at sites being considered by the West Somerset Local Plan to 2032. The study has considered the ‘magnitude’ and ‘sensitivity’ of sites. Sensitivity might be, its proximity to the Exmoor National Park or, its visibility over a wide area. Magnitude is based on the number of houses that the site could accommodate at 35 dwellings per Hectare (figure identified for ‘broad locations for development’ in the Strategic Housing Land Availability Assessment<sup>12</sup>). By combining these two ‘scores’, an assessment of the significance of the visual impact is arrived at. A further assessment was undertaken to consider whether the visual impact of the proposals could be reduced through landscape mitigation and, if so, to what extent. A scoring system has been used to help grade the visual impact taking account of the sensitivity of the site and the magnitude of the development. This has used the following descriptions;

***Table 1: Significance of visual impact***

<b>Grade</b>	<b>Description</b>
1	Negligible
2	Slight adverse
3	Low adverse
4	Moderate adverse
5	High adverse
6	Substantial adverse

The ‘comments’ part of the tables identifies other considerations such as national designations and where, under particular circumstances, a further reduction in the visual impact of the development on the surrounding landscape could be achieved. Additional notes affecting specific sites are included beneath the relevant table where these are linked to other factors and/or events have taken place subsequently.

### ***The Assessments***

The three tables below look at a number of locations around the main settlements of Minehead, Watchet and, Williton, which have been selected as the preferred locations for the majority of the future planned residential development during the life-time of the Local Plan. These are ones that formed part of a wider range of areas, of varying sizes, that were considered by the Council’s Local Development

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<sup>11</sup> The Landscape Institute and Institute of Environmental Management & Assessment; Guidelines for Landscape and Visual Impact Assessment (3<sup>rd</sup> edition); Routledge; 2013; ISBN 978 0 415 68004 2.

<sup>12</sup> Hunter Page Planning; West Somerset District Council Strategic Housing Land Availability Assessment – March 2010; West Somerset Council; 2010.

Panel at their meeting on 18<sup>th</sup> October 2011<sup>13</sup> as part of the process of determining where strategic levels of development could be located. Some of the locations that were considered have been omitted from the visual impact assessment process as they were subject to significant constraints (e.g. flooding, accessibility, etc.,) which would inhibit their availability and deliverability should they be selected. A general assessment of the suitability and deliverability of most of the sites was considered by the Council's Local Development Panel at its meeting on 11<sup>th</sup> April 2013<sup>14</sup> which informed the selection of sites to be consulted on in the Revised Preferred Strategy.<sup>15</sup> Most of the locations considered at the meeting had originally been identified either as sites nominated for potential development or, considered as potential 'broad-locations-for-development' through the original Strategic Housing Land Availability Assessment (SHLAA).<sup>16</sup> One site at Watchet (D3) was not identified until the Revised Preferred Strategy stage,<sup>17</sup> when it was included as a potential long-term development location. It has been included as part of the overall landscape character assessment as it was nominated through the second 'call-for-sites' to update the Strategic Housing Land Availability Assessment (SHLAA) in January 2013. It offers the potential to help fund the re-alignment of a part of the B.3191 on Cleeve Hill that is currently at risk of falling into the sea due to erosion by wave action at the base of the cliffs by Daw's Castle, west of Watchet. The road is an important strategic alternative to the A.39 should the latter be closed to traffic, particularly between Washford Cross and Carhampton.

#### **Landscape Assessors notes:**

*Extensive landscape mitigation may reduce the visual impact of sites but may make the site unaffordable in terms of development. In carrying out the assessment I have been mindful of being realistic with expectations of the extent of landscape mitigation. Where sites are thought to have potential for development, based on landscape as well as other consideration, I have carried out a further study to show how the sites could be best developed to reduce landscape impacts. Some sites are likely to have high visual impacts even with significant landscape mitigation.*

#### **Landscape Impacts**

*No detailed assessment has been carried out on landscape character impacts as all of the sites are edge of town, urban fringe, sites typical of the landscape character of the area and therefore a comparative study would have little benefit in providing a hierarchy of site selection.*

***(Ian Clarke CMLI: Heritage and Landscape Officer TDBC, 22<sup>nd</sup> May 2014)***

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<sup>13</sup> Wilsher, M.: Strategic Directions for Growth (report to the Local Development Panel Meeting held on 18<sup>th</sup> October 2011 – Agenda Item 5 [Report No. 132/11] and Appendix A: West Somerset LDF Core Strategy – Future Directions of Growth); West Somerset Council; 2011.

<sup>14</sup> Clempson, T.; West Somerset Local Plan to 2032 – Key Strategic Site Selection (report to Local Development Panel meeting held on 11<sup>th</sup> April 2013 – Agenda Item 6 [Report No. 51/13] and Appendices 1 – 3); West Somerset Council; 2013.

<sup>15</sup> West Somerset Council; The West Somerset Local Plan to 2032 Revised draft Preferred Strategy – June 2013; op. cit.

<sup>16</sup> Hunter Page Planning; West Somerset District Council Strategic Housing Land Availability Assessment – March 2010; West Somerset Council; 2010; p.11

<sup>17</sup> West Somerset Council; The West Somerset Local Plan to 2032 Revised draft Preferred Strategy – June 2013; op. cit.

## Minehead

**Table 2: Sub-areas assessed around Minehead**

Sub-Area	Location	Visual Impact	Sensitivity	Magnitude	Total*	Visual Impact + Mitigation	Comments
A3	Mount Brake, Porlock Road	3	4	1	4	2	
A4	South of A39 Middlecombe Cross	6	5	4	20	5	Close to boundary with ENPA
A5	South of A39 Periton Road	6	5	4	20	5	Close to boundary with ENPA
A6	South of A39 Hopcott Road	5	4	5	20	4	Close to boundary with ENPA 3 if only lower northern slope developed
A9	Rugby Club and Ellicombe Meadow	4	5	2	10	3	Close to boundary with ENPA 2 if only lower northern slope developed
B1	North and east of Seaward Way to WSR	5	4	4	16	4	Major route into Minehead Close to West Somerset Railway
B2	North of A39 between Drift Road and Seaward Way	5	4	4	16	4	Major route into Minehead Close to West Somerset Railway

### Notes on Minehead sub-areas

#### Overview

The sites assessed to have least visual impact are A3 and A9. A6 would also have a low impact if only the lower more northerly part of the site is developed. The sites assessed to have the highest visual impact are A4 and A5. This is principally due to their proximity to the Exmoor National Park boundary and the high visibility of the land from within Minehead and the surrounding countryside. The study of heritage assets in West Somerset<sup>18</sup> noted that the land between the existing southern built-up urban edge of Minehead and the northern boundary of the Exmoor National Park (affecting sub-areas, A4, A5 and A6 in particular) was not part of the traditional historic land-use associated with the area. The land to the immediate south of this, comprising; Periton Hill Plantation, Hopcott Brake and, Callins<sup>19</sup> had been subject to a significant afforestation programme during the middle of the last century. This involved planting of a mixture of coniferous

<sup>18</sup> Somerset County Council Historic Environmental Service; West Somerset Council Local Planning Authority Historic Environment Issues Paper – Compiled in April 2014; West Somerset Council; 2014; pp. 7 & 10.

<sup>19</sup> Ordnance Survey; OS Explorer Map OL9: Exmoor (1:25,000 scale); Ordnance Survey; 2005; ISBN 0 319 23692 7.

and deciduous trees in the ratio of 2:1,<sup>20</sup> with the latter being planted on the outer edges in order to screen the faster-growing evergreens that were not indigenous species to the local area. The conifer species are now reaching maturity and due to their faster rate of growth are becoming increasingly visible in the landscape both locally and at a distance.

### ***Sub-area specific***

**A3** – This site was omitted from the Revised Preferred Strategy round of consultation as, by itself, it was deemed to possess insufficient land to meet the criteria required (minimum of c.250 dwellings and, 3 Hectares of land for employment generating activities) to be considered as a strategic location for development.

**A4** – The southern part of the site, closest to the boundary with the Exmoor National Park was identified as falling within a foraging corridor of a nationally protected species (Barbastelle Bat) as part of the Habitats Regulation Assessment on the Preferred Strategy.<sup>21</sup> Development proposals within the identified area would require an Environmental Impact Assessment and/or Appropriate Assessment<sup>22</sup> work to be carried out. This could significantly add to costs (in terms of mitigation works and/or biodiversity off-setting requirements) that could affect the overall viability and early deliverability of the land. Part of the land was identified as having contamination issues through its former use as a land-fill site.

**A5** – The southern part of the site, closest to the boundary with the Exmoor National Park was identified as falling within a foraging corridor of a nationally protected species (Barbastelle Bat) as part of the Habitats Regulation Assessment on the Preferred Strategy.<sup>23</sup> Development proposals within the identified area would require an Environmental Impact Assessment and/or Appropriate Assessment<sup>24</sup> work to be carried out. This could significantly add to costs (in terms of mitigation works and/or biodiversity off-setting requirements) that could affect the overall viability and early deliverability of the land. As a consequence of this, the northern edge of the foraging corridor was used as a proxy boundary in terms of the extent of the land to be allocated as part of a, 'strategic direction of growth' in the Preferred Strategy<sup>25</sup> and, the southern boundary of the strategic site in the Revised Preferred Strategy.<sup>26</sup>

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<sup>20</sup> Somerset County Council; Town and Country Planning Act, 1962 County Development Plan First Review 1964: Report of Survey – 1 Administrative County; Somerset County Council; 1964; p.75.

<sup>21</sup> Somerset County Council; West Somerset Local Plan 2012 to 2032 Draft Preferred Strategy: Habitat Regulations Assessment – January 2012; West Somerset Council; 2012.

<sup>22</sup> H.M. Government; Environmental Protection: The Environmental Assessment of Plans and Programmes Regulations 2004 – Statutory Instrument 2004 No. 1633 (S.I. 2004: 1633); The Stationary Office; 2004; ISBN 0 11 049455 5.

<sup>23</sup> Somerset County Council; West Somerset Local Plan 2012 to 2032 Draft Preferred Strategy: Habitat Regulations Assessment – January 2012; op. cit.

<sup>24</sup> H.M. Government; Environmental Protection: The Environmental Assessment of Plans and Programmes Regulations 2004 – Statutory Instrument 2004 No. 1633 (S.I. 2004: 1633); op. cit.

<sup>25</sup> West Somerset Council; West Somerset Local Plan to 2012 to 2032, Proposed Amendments to the Draft Preferred Strategy in Response to the Habitat Regulations Assessment of the Plan – January 2012; West Somerset Council; 2012

<sup>26</sup> West Somerset Council; The West Somerset Local Plan to 2032 Revised draft Preferred Strategy – June 2013; op. cit.

**A6** – The southern part of the site, closest to the boundary with the Exmoor National Park was identified as falling within a foraging corridor of a nationally protected species (Barbastelle Bat) as part of the Habitats Regulation Assessment on the Preferred Strategy.<sup>27</sup> Development proposals within the identified area would require an Environmental Impact Assessment and/or Appropriate Assessment work to be carried out. This could significantly add to costs (in terms of mitigation works and/or biodiversity off-setting requirements) that could affect the overall viability and early deliverability of the land. As a consequence of this, the northern edge of the foraging corridor was used as a proxy boundary in terms of the extent of the land to be allocated as part of a, ‘strategic direction of growth’ in the Preferred Strategy<sup>28</sup> and, the southern boundary of the strategic site in the Revised Preferred Strategy.<sup>29</sup> It also suggests that the potential ‘visual impact + mitigation’ score can be down-graded from 4 – moderate adverse to, 3 – low adverse.

**A9** – This site was omitted from the Revised Preferred Strategy round of consultation as, by itself, it was deemed to possess insufficient land to meet the criteria required (minimum of c.250 dwellings and, 3 Hectares of land for employment generating activities) to be considered as a strategic location for development. The southern part of the area has subsequently been granted planning permission for residential development.

**B1** – This site was omitted from the Revised Preferred Strategy round of consultation as the whole of the area was identified as being within, Flood Zone 3a in the Strategic Flood Risk Assessment<sup>30</sup> and forming an important retention area for surface water run-off in the Minehead Surface Water Management Plan.<sup>31</sup> This could significantly add to costs (in terms of mitigation works to prevent flooding on the land and potential displacement to adjoining land) that could affect the overall viability and early deliverability of the land.

**B2** – This site was omitted from the Revised Preferred Strategy round of consultation as almost the whole of the area was identified as being within, Flood Zone 3a in the Strategic Flood Risk Assessment<sup>32</sup> and forming an important retention area for surface water run-off in the Minehead Surface Water Management Plan.<sup>33</sup> This could significantly add to costs (in terms of mitigation works to prevent flooding on the land and potential displacement to adjoining land) that could affect the overall viability and early deliverability of the land.

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<sup>27</sup> Somerset County Council; West Somerset Local Plan 2012 to 2032 Draft Preferred Strategy: Habitat Regulations Assessment – January 2012; op. cit.

<sup>28</sup> West Somerset Council; West Somerset Local Plan to 2012 to 2032, Proposed Amendments to the Draft Preferred Strategy in Response to the Habitat Regulations Assessment of the Plan – January 2012; op. cit.

<sup>29</sup> West Somerset Council; The West Somerset Local Plan to 2032 Revised draft Preferred Strategy – June 2013; op. cit.

<sup>30</sup> Scott Wilson; West Somerset Council & Exmoor National Park Authority Strategic Flood Risk Assessment Level 1: Final Report – March 2009; West Somerset Council; 2009.

<sup>31</sup> Hyder Consulting (UK) Limited; Minehead Surface Water Management Plan, Detailed Assessment and Options Appraisal Report 2012; Somerset County Council; 2012

<sup>32</sup> Scott Wilson; West Somerset Council & Exmoor National Park Authority Strategic Flood Risk Assessment Level 1: Final Report – March 2009; op. cit.

<sup>33</sup> Hyder Consulting (UK) Limited; Minehead Surface Water Management Plan, Detailed Assessment and Options Appraisal Report 2012; op. cit.

## Watchet

**Table 3: Sub-areas assessed around Watchet**

Sub-Area	Location	Visual Impact	Sensitivity	Magnitude	Total*	Visual Impact + Mitigation	Comments
D1	Parsonage Farm, Brendon Road	4	4	2	8	3	Listed Buildings
D2	Land east and north of Parsonage Farm	3	3	4	12	2	
D3	Land south and east of B3191 Cleeve Hill	5	4	3	12	4	Prominent position near sea cliff
E1	Land north of Doniford Road	5	4	3	12	4	Prominent position on sea shore Close to West Somerset Railway
E2	Land between Doniford Road and Normandy Road	5	4	4	16	4	Prominent position near sea shore Close to West Somerset Railway
E3	Land between Normandy Road and Liddymore Lane	3	3	3	9	2	
E4	Land south-east of Liddymore Lane	3	3	3	9	2	

### Notes on Watchet sub-areas

#### Overview

These are generally low in their visual impact but where sites are close to the sea or West Somerset Railway route their sensitivity is higher. On Sub-areas D2, E3 and, E4 the visual impact will be lowest, whilst on Sub-areas D3, E1 and, E2 the visual impact will be highest.

#### Sub-area specific

**D1** – This contains a collection of Listed Buildings that comprise the farm complex. If developed in conjunction with Sub-area D2, then the farm complex buildings could provide the preferred location for the employment generating activities of the overall allocation, through

conversion. The heritage asset study noted that the allocation of the land and that adjoining to the north would result in the loss of the semi-rural character and setting of the area.<sup>34</sup>

**D3** – The sub-area adjoins a stretch of active coastline that includes elevated land and cliff-faces. These could be subject to unexpected and rapid change due to the absence of any sea defences along this stretch of coastline, thus altering the composition of the landscape locally and, how it may appear visually, from more distant locations. The revised Shoreline Management Plan identifies the stretch of coast that includes Daws Castle and the eastern end of Cleeve Hill that adjoin the Sub-area is one where the proposed approach will continue to be one of, “..no active intervention..”<sup>35</sup> It is because of this risk and, the consequential impact on the B.3191 road that links Watchet with Blue Anchor, and Carhampton, which at times operates as a strategic alternative route to the A.39 between Washford Cross and Carhampton when this stretch of road is closed to traffic, that the Sub-area has been considered as a strategic location for development. The land included within the Sub-area offers the prospect of a second re-alignment of the B.3191.

**E1** - The sub-area adjoins a stretch of active coastline from which it is separated by the West Somerset Railway. The land is approximately 20m above mean sea level. Whilst there is some existing flood defences in the form of ‘rock-armour’ on the seaward side of the railway, the revised Shoreline Management Plan is ambiguous as to whether this will continue to be maintained over the longer-term.<sup>36</sup> If it is not maintained, the baseline study for the Shoreline Management Plan suggests that the average level of erosion of the coastline along this stretch would be around 0.5m per annum or 50m over the duration of the plan period. It also acknowledges that in some places the extent of coastal erosion could be almost double this.<sup>37</sup> This could result in a change to the current coastal landscape in this area when viewed from more elevated locations nearby. The consequence of the suggested level of coastal erosion would mean that the track of the railway may have to be re-aligned to the south of its current route. A recent planning permission for housing that was granted on land to the immediate west of the Sub-area, made provision for land to be identified along its northern edge for this eventuality.

**E2** – The western and southern part of this Sub-area is identified and designated as a County Wildlife Site in the adopted Local Plan.<sup>38</sup>

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<sup>34</sup> Somerset County Council Historic Environmental Service; West Somerset Council Local Planning Authority Historic Environment Issues Paper – Compiled in April 2014; West Somerset Council; 2014; pp. 20 - 23

<sup>35</sup> Halcrow Group Ltd.; North Devon and Somerset Coastal Advisory Group (NDASCAG) Shoreline Management Plan Review (SMP2): Hartland Point to Anchor Head – Shoreline Management Plan (Final Draft), October 2010; North Devon and Somerset Coastal Advisory Group; 2011; p.170.

<sup>36</sup> *ibid*; pp.170 – 172.

<sup>37</sup> Halcrow Group Ltd.; North Devon and Somerset Coastal Advisory Group (NDASCAG) Shoreline Management Plan Review (SMP2): Hartland Point to Anchor Head – Shoreline Management Plan (Final Draft), Appendix C – Baseline Process Understanding; North Devon and Somerset Coastal Advisory Group; 2011; pp.C.98 – C.100

<sup>38</sup> West Somerset District Council; West Somerset District Local Plan – Adopted, April 2006; *op. cit.*

## Williton

**Table 4: WILLITON**

Sub-Area	Location	Visual Impact	Sensitivity	Magnitude	Total*	Visual Impact + Mitigation	Comments
F3	Land between Catwell and Tower Hill Quarry	4	3	3	9	3	
F4	Land north of A358, Tower Hill	4	3	4	12	3	
G1	Land north of schools and west of Liddymore Lane	3	3	3	9	2	
G2	Land between WSR and Liddymore Lane	3	3	2	6	2	
H1a	Land north of A39 and east of Mamsey Lane	4	3	5	15	3	Adjoins A39 Adjoins Scheduled Ancient Monument
H1b	Land between A39 and Outmoor Wood	5	3	5	15	4	Adjoins A39

### Notes on Williton sub-areas

#### Overview

These generally have a lower visual impact given their lower sensitivity scores which reflects their lack of prominence in the local landscape and lack of sensitivity i.e. not close to any special designated landscape such as Exmoor National Park. The lowest impact sites are G1 and G2 with H1b as the highest impact site.

#### Sub-area specific

**H1a** – The sub-area is physically separated from the existing built-up area of the village of Williton due to an area of land that was formerly used as water-meadows and for which a network of sluices still exist. The Level 1 Strategic Flood Risk Assessment identified much of this land as being in Flood Zone 3b or, operational floodplain due to its former use.<sup>39</sup> The north-eastern part of the Sub-area adjoins an important Scheduled Ancient Monument of Battlegore and the heritage asset study has indicated that any development in this area will have an adverse visual impact on the site and its setting.<sup>40</sup>

<sup>39</sup> Scott Wilson; West Somerset Council & Exmoor National Park Authority Strategic Flood Risk Assessment Level 1: Final Report – March 2009; op. cit.

<sup>40</sup> Somerset County Council Historic Environmental Service; West Somerset Council Local Planning Authority Historic Environment Issues Paper – Compiled in April 2014; West Somerset Council; 2014; pp. 13 – 16.