

Stogumber Neighbourhood Plan

Stogumber Parish Council's response to the 'Examiner's initial list of questions for clarification' received on 27 February 2017

Julian Spicer (SPC) met Ann Rhodes (WSC) and Tim Burton (WSC Assistant Director Planning and Environment) on 23 March to discuss this response. The points marked * have the *support* of WSC, and for the remainder, WSC is happy for the Examiner to consider the case made by Stogumber Parish Council.

Proposed new Plan text is inset and shaded grey.

1.	<p>Period of the Plan *</p> <p>We agree that the period needs to be stated alongside the title on the front page.</p> <p>The Parish Council's intention is to have a Plan that has an <i>effective</i> period of 10 years. Since the Plan cannot act retrospectively to guide permissions already granted, and has / is not been treated as 'emerging' policy in determining applications at present, then an effective Plan period would need to close in 10 years from the date it is expected to be 'made'. This would accord with a layman's understanding of the term of a plan, but the Examiner will know how best to express this in 'Planning language', perhaps as follows:</p> <ul style="list-style-type: none"> • 'April 2012 to September 2026' [ie. from the base date for the West Somerset Local Plan]; or • 'November 2016 to September 2026' [ie. from the date of the Plan was submitted]
2.	<p>Excluded development (Quarrying) *</p> <p>We agree that references in <i>policies</i> to Quarrying should be deleted from the Plan, though it is interesting that Somerset County Council (the authority with responsibility for this activity) supported the inclusion of Quarrying in the Plan.</p> <p>We would like to retain in the supporting text a statement about the importance of quarrying (and the use of local stone) to the historic development of the landscape and built character of the Parish, and the continuing importance of quarrying for local employment, farm business diversification and viability, and for enabling the use of local stone in new building to help maintain the built character of the Parish.</p>
3.	<p>Plan content and policy wording *</p> <p>'Supported' vs 'granted'</p> <p>We agree that statements that 'development will be supported' should be changed to 'permission will be granted'.</p> <p>Duplication of criteria</p> <p>The duplication of criteria was a conscious decision, with the referendum in mind. Through the consultation process, many residents have taken a close and active interest in the Plan. As would be expected, there was initially a range of opinion, from people anxious about <i>any</i> development, to those who were <i>generally keen</i> on development.</p> <p>A consensus has been built around the need for additional development to support essential facilities and services in the village (school, shop, etc) provided that such development would not have harmful impacts (on the landscape, built character, etc). In repeating these criteria in each policy, our intention was to reassure residents reading the Plan that the impacts will be assessed along with the benefits.</p> <p>Unlike professional planners and developers who can be expected to read and understand the Plan as a whole, our fear was that many residents may just look at the individual policies which concerned them. We are seeking to avoid residents voting against the Plan because it appears to them that development will be less constrained than would actually be the case.</p> <p>However, we agree that the duplicated criteria should be replaced within individual policies by references back to the single over-arching policy which the Examiner suggests, and such references should give residents the reassurance that many of them will be seeking.</p> <p>A draft for the over-arching policy, and amendments to the individual policies, are given in the given in 5 below.</p>
4.	<p>Vision</p> <p>We agree that the guiding Objectives on page 6 should be converted into a 'Vision'. Here is a draft for consideration by the Examiner:</p> <p style="background-color: #e0e0e0;">The vision for Stogumber is that economic and social infrastructure are strengthened, through appropriate forms and levels of development, so that:</p> <ul style="list-style-type: none"> • Stogumber will continue to be a vibrant, inclusive and caring community. • More young people will be able to stay in Stogumber when they start a family, and more young families will be enabled to move into the village.

- Facilities and services for older members of the community will be maintained and improved, so that they can continue to live in Stogumber as their need for support increases.
- There will be more employment opportunities for residents, and increased economic activity in the village that will maintain and increase the viability of existing businesses, facilities and services.
- The architectural and landscape character of the village, hamlets and countryside will be maintained and enhanced.

5. Policy O1 Overall Objectives and Policy EN1 Local Environment *

We agree that the Policy O1 and Policy EN1 should together be replaced by an over-arching policy along the lines suggested by the Examiner.

We have struggled a little with the first bullet, with WSC suggesting “demonstrable loss” and our planning consultant advising “significant impact”. Our aim - clearly supported by residents through the consultation process - to facilitate a level of development to support essential services and facilities. We and the residents (again demonstrated through the consultation process) accept that this development would have some impact on some residents’ amenities, but that excessive impact would not be permitted. The phrase used in the draft Plan through the consultation process has been “significant harmful impacts”.

It seems to us that “demonstrable loss” would be more restrictive than the phrase that we have been using, but we would welcome the Examiner’s advice on the wording that would in planning practice achieve our objective.

[Supporting text] This Plan has specific policies for specific types of development. Underpinning these are the Overall Requirements for Development, which apply to all forms of development.

O1 Overall requirements for development

Proposals for new development should ensure that:

- There is not a [phrase to be agreed] of residential amenity*.
- The setting of the village, and the landscape and built character of the Parish, is maintained or enhanced.
- The provision and range of essential facilities and services, and the economic and social vitality of the community, are maintained or enhanced.
- Road safety, especially for pedestrians and cyclists, is maintained or enhanced, and that demand is not created for additional on-street car-parking.

Development which helps increase the number of young families in the Parish or improves support and services for older people will be welcomed and permitted, subject to the above criteria.

[Please see also 15 below].

[in the same sense as used in the NPPF section 17, Core Plan Principles]*

In the supporting text, we suggest there could be reference to support (subject to the criteria in the Policy) of development in use classes D1 Non-residential institutions [ie. clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non residential education and training centres] and D2 Assembly and leisure [ie. cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used)].

Deletion of criteria from individual policies

We agree that the following criteria can be deleted from the following policies.

EN7: delete both bullets

C5: delete both bullets

C10: delete second main (solid) bullet

C11: new policy wording (including removal of the bulleted criteria) is suggested in 23 below.

EC1: delete all three bullets

EC2 (Guests houses, B&Bs): delete final three bullets

EC2 (self-catering units): delete bullets 3-5 inclusive

EC2 (‘Glamping’): delete bullets 2-4 inclusive

EC3: delete bullets 1-3 inclusive

EC5: delete all three bullets

EC6: delete all three bullets

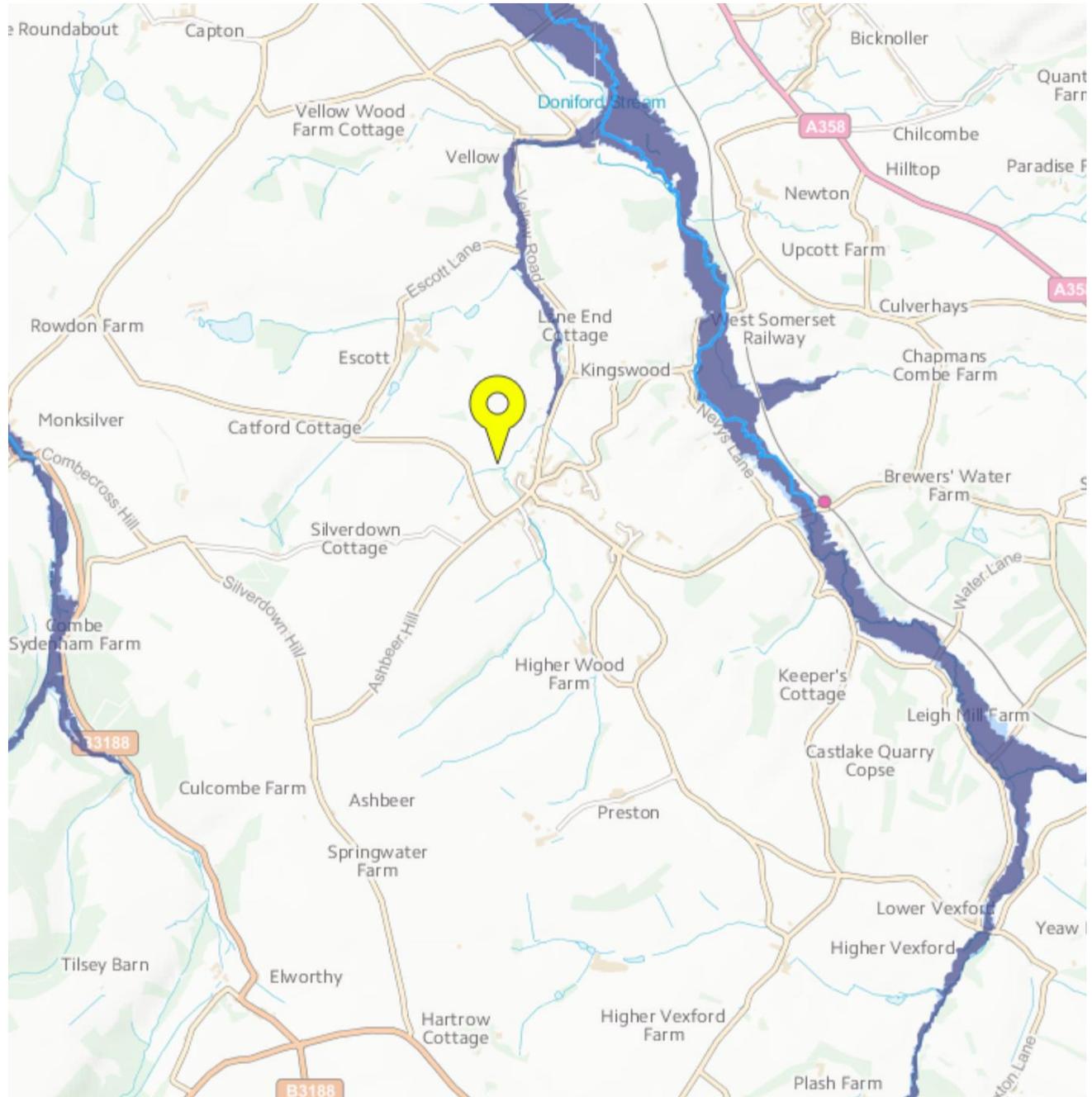
	<p>We propose that these deletions be accompanied by insertion of the following phrase to reassure residents (as discussed above):</p> <p style="text-align: center;">“...subject to Policy O1”</p>
<p>6.</p>	<p>Policy EN2 Location of Development *</p> <p>We have made a deliberate decision not to identify (apart from the bottom of Beacon Field which is owned by the Parish Council) specific sites for development, and instead set criteria to guide site owners and developers in considering what development to propose for which sites, and for the planning authority to assess whether the development proposed is acceptable. We made this decision because it became very clear in the consultation process that identifying development sites (and also identification of specific sensitive sites where there would be a presumption against development) aroused <i>very</i> strong feelings amongst residents. A consensus would not have been possible and so the process of drafting the Plan would have become mired in controversy, and the referendum result would be in doubt. As a small rural community, we felt that relying upon small majority votes, whether of the Parish Council or at the referendum, would leave many people (even those on the ‘winning’ side) unsatisfied with a Plan that did not represent the views of the community as a whole.</p> <p>There is relatively little land that meets the NPPF definition of brownfield. Unlike larger settlements, there has been little industrial or commercial building in Stogumber, and what there was (such as the garage and bakery) have already been converted into residential use.</p> <p>However, everyone is well aware that there are large gardens and orchards in the heart of the village, which are not visible from the street but can be seen on maps and aerial photographs, and that there are two farmyards and sets of farm buildings (excluded from the NPPF definition of brownfield) adjacent to the village. Because it is generally known about, we can say here that Hill Farm yard and buildings (at the end of the Brook Street dog-leg) are likely to be proposed for redevelopment with possibly 8-12 houses within the Plan period, as the move is already underway of the farm buildings to a more appropriate location on Ashbeer Hill.</p>
<p>7.</p>	<p>Policy EN2 Location of Development: ‘within and immediately adjacent...’ *</p> <p>We suggest that the definition could be amended to match that used in the WSLP (Policy SC1, point 4, on page 21):</p> <p>“Development within or in close proximity (within 50 metres) to the contiguous built-up area of...”</p> <p>We have suggested revised wording below (after 10).</p>
<p>8.</p>	<p>Policy EN2 Location of Development: second paragraph *</p> <p>Yes; sites that satisfy a and b (in the proposed wording below) are the most <i>preferred</i> locations of development. We agree that the second sentence of the second paragraph could be deleted.</p>
<p>9.</p>	<p>Policy EN2 Location of Development: extending the NPPF definition of previously developed land *</p> <p>a) Our intention was simply to extend the NPPF definition of previously developed land (‘brownfield’) to include <i>agricultural or forestry buildings and land within private residential gardens</i> where these are within in or close proximity (see 7 above) to Stogumber. However, we can now see that having two definitions for previously developed land (one matching the NPPF and the other extended) could be confusing. We have therefore suggested below a way of expressing more obviously and clearly the preferred location of development.</p> <p>Therefore, <i>agricultural or forestry buildings and land within private residential gardens</i> that are <u>not</u> within in or close proximity to Stogumber and the hamlets would be considered ‘greenfield’.</p> <p>We agree that the reference in the policy to Quarrying (EN2, para 3, whole of sentence 2) can be deleted.</p> <p>We have suggested revised wording below (after 10).</p> <p>b) Yes, all the land defined as ‘brownfield’ above would have equal priority.</p> <p>c) If the definition of ‘within or in close proximity’ (see 7 above) is accepted, then true ‘infill’ sites will be accepted as meeting Policy EN2 Location of Development. Sites that are <i>more than</i> 50 metres away from the nearest point of the contiguous built-up area would not be considered ‘infill’.</p> <p>The policy does not seek to prevent all greenfield development, but (having significantly broadened the definition of brownfield) the policy does aim to make greenfield development an exception rather than the norm.</p> <p>d) The reason and justification for broadening the definition of brownfield is that a large proportion of residents wish to minimise development on the agricultural fields around the village, and the need to keep agricultural land in production, to support the rural economy of the Parish. Broadening the definition of brownfield brings into scope sufficient land for additional development to support the essential services in the village. Without extending the definition of brownfield, it would be necessary to anticipate greater building on the fields around the village. Essentially, some additional development is essential to maintain the sustainability and level of self-containedness of the village, and the consensus is that this development</p>

	<p>is best located on previously developed land (more broadly defined than in the NPPF). This seems to us in line with the <i>spirit</i> of the NPPF, assuming the NPPF is not seeking to direct necessary development to agricultural fields.</p>
10.	<p>Policy EN2 Location of Development: development in the hamlets *</p> <p>At its meeting last night, Parish Councillors and residents strongly expressed their support for this small (almost insignificant relative to the District) level of development in the hamlets, and that this is justified by the arguments put forward in the draft Plan. However, with great reluctance we recognised that these arguments had failed to convince WSC and the Examiner, and that it would be unwise to take the matter to a public hearing when we have no new arguments to present. In developing the Plan we have achieved a consensus and unanimity across the Parish Council, but last night, it was by a majority vote that we decided that references to development in the hamlets could be deleted.</p> <p>Taking into account 6 to 10 above, we suggest that EN2 be amended to read as follows:</p> <p>The preferred location for new development is within or in close proximity (within 50 metres) of to the contiguous built-up area of Stogumber village, on:</p> <ul style="list-style-type: none"> • previously developed land as defined in the NPPF⁷; or • land within private residential gardens; or • land that is or has been occupied by agricultural or forestry buildings. <p>All other land will be regarded as greenfield. Greenfield sites are not the preferred locations for new development, and new development on greenfield sites will only be permitted in exceptional circumstances.</p> <p>Development is not permitted on designated Local Geological Sites or Local Wildlife Sites (see Appendix 3).</p> <p>Policy EN3 Setting of Stogumber *</p> <p>We agree that the first paragraph should be moved to the supporting text for O1 (the over-arching policy) and we have suggested above that the second paragraph be incorporated into the O1 policy text, so there is no longer a need for a separate Policy EN3.</p>
11.	<p>Policy EN4 Larger Development sites</p> <p>The thinking behind this policy is that if there were a larger development over the Plan period that took the total number of new houses over around 14 (Policy C3), such a development may be acceptable if it yielded significant specific benefits to the community in addition to those which would arise from development up to the development limit of around 14 dwellings. For example, a much higher proportion of affordable houses, or a large contribution towards a new village hall.</p> <p>We agree that the policy could express the above more clearly, and if the Examiner is satisfied with the intention, we could suggest revised wording, including a change of title to something like ‘Policy EN4 Additional Development’.</p> <p>We agree that the reference to the size of the site is superfluous and can be deleted.</p>
12.	<p>Policy EN6: Flood Risk</p> <p>We agree that the first paragraph of the policy can be deleted, and the second paragraph moved to the supporting text.</p> <p>a) The NPPF states that “... risk of flooding should be avoided by directing development away from areas at highest risk ...” (paragraph 100; first sentence). The ‘Flood map for planning’ (https://flood-map-for-planning.service.gov.uk/ see below [parish boundary not marked but largely follows the Doniford Stream on the right putting much of Flood Zones 2 and 3 in Crowcombe and Bicknoller Parishes]) shows that there is no land within or in close proximity to Stogumber village (which is the preferred location of development - Policy EN2) that is in Flood Zones 2 or 3. Therefore, we suggest that the particular topography of Stogumber constitutes exceptional circumstances, and as suggested by the Environment Agency, and that refusing all development in Flood Zones 2 and 3 is viable and does conform with the national policy objective to minimise flood risk.</p> <p>b) With reference to the ‘Flood map for planning’ we do not think that there is a justifiable need for agricultural buildings (in those cases where planning consent is required) to be located in Flood Zones 2 or 3. The flood map shows that the small proportion of land in the Parish that is in Flood Zones 2 or 3 is located in narrow strips along the Doniford Brook (north of the village) and the Doniford Stream that forms the boundary with Crowcombe Parish. It is also notable that of the land that is in Flood Zones 2 or 3, there is very little land in Flood Zone 2; it is almost all in Flood Zone 3, the area at highest risk. In other words, unlike many other river catchments and on the Somerset Levels, there are not broad areas of land in Flood Zones 2 or 3. The agricultural holdings with land in these narrow strips of Flood Zones 2 and 3 have much larger areas of adjacent land that is in Flood Zone 1, the lowest risk. We suggest that in this Parish it is reasonable to avoid locating even agricultural buildings (in those cases where planning consent is required) in Flood Zones 2 and 3. For example, Cheddarmarsh Farm is a newly established agricultural holding north</p>

of Kingswood which includes a flood plain of the Doniford Stream (Flood Zone 3) and a steep hillside rising to a prominent ridge; the farmhouse and large agricultural buildings have been constructed just where the plain meets the hill, out of range of flooding but not too steep for viable building.

In contrast to Stogumber, the WSLP does cover places, including larger settlements, where there are much broader areas in Flood Zones 2 or 3 and therefore it is understandable that the WSLP needs to contemplate the possibility of development in those Flood Zones, and we think reasonable that the Stogumber Neighbourhood Plan (with a different pattern of flood risk) should differ from the WSLP in this respect.

It is also likely that larger agricultural buildings would be sought on agricultural holdings where agricultural buildings can be erected under permitted development.



13. Policy EN7 Renewable Energy *

- a) We do understand that the Plan cannot govern permitted development, and we agree that the supporting text should acknowledge that some small-scale domestic wind turbines may be permitted development.
- b) and c) It is not our intention that Stogumber should be regarded as ‘an area identified as suitable for wind energy development’ and we agree that the reference to wind turbines in the final paragraph should be deleted.

14. Policy EN8 Transport and Development *

We agree that this policy can be deleted.

15.	<p>Policy C1 Local Community *</p> <p>a) and c) We agree that aims of this policy can be met through the new Policy O1 (see suggested wording in 5 above).</p> <p>b) In relation to the suggested Policy O1, strongly supported is intended to mean that aspects of a development that would help the community to meet its own needs would be given significant weight when the merits of the development are assessed.</p> <p>d) Under 24 below, we have stated that we agree that Policy C12 Essential Services could be deleted.</p> <p>e) In relation to the suggested Policy O1, we agree that ‘facility’ and ‘service’ are similar, but they are not quite the same. The Oxford English Dictionary (https://en.oxforddictionaries.com/) gives the first definition of ‘facility’ as “A place, amenity, or piece of equipment provided for a particular purpose” which we think fits the Village Hall or Deane Close Common Room. The same dictionary gives the first meaning of ‘service’ as “The action of helping or doing work for someone” which we think fits the shop or pub. In the light of this, it may be clearer if current references throughout the Plan to ‘services’ are amended to ‘facilities and services’? As with c) above, we feel that it would be difficult to identify now everything that is or will be (over the Plan term) of value to the community.</p>
16.	<p>Policy C2 Housing Sites</p> <p>a) We agree * that the second sentence of the Housing supporting text on page 15 could be deleted.</p> <p>b) and c) We agree * that the first and second paragraphs of the policy could be deleted.</p> <p>With regard to the remaining paragraphs:</p> <ul style="list-style-type: none"> • A site that is for just one house can still assist or detract from the social and physical integration of the settlement. For instance, a house with blank walls, high fences and tall solid gates may make a particular stretch of street feel unwelcoming or even unsafe. • The fourth paragraph would not apply to a single house, but we feel that this is sufficiently obvious that it would not cause any confusion or uncertainty. • And the point about density will be pertinent to applications for single houses. <p>d) Stogumber is a small rural community: we wish for developments that, through their design and layout, do not create divisions.</p> <p>e) We have not discussed this policy with affordable housing providers. We did meet with Magna which owns a quarter of the houses in the village, but layouts did not arise because they did not feel that there was sufficient demand to justify them building any more houses in Stogumber (and indeed they have since sold on the open market - not to tenants - two houses in Slade Close).</p> <p>A preference to group affordable dwellings together is understandable when large housing estates are being created. However, developments (with onsite provision of affordable housing) in Stogumber will be so small that the affordable houses are very likely to be within 50m (or less) of each other, and it does not seem to us that this would create significant maintenance and management difficulties.</p> <p>f) We agree * that the fourth paragraph could be deleted.</p> <p>g) We agree * that the last paragraph could be moved into Policy C3 and reworded as follows:</p> <p style="padding-left: 40px;">Developments may be refused where the number of dwellings proposed is lower than the site’s reasonable capacity, taking into account the constraints of the site, resulting in a lower provision or contribution towards affordable housing.</p>
17.	<p>Policy C3 Housing Delivery</p> <p>We understand, and West Somerset Council have confirmed that this is also their understanding, that one of the principles behind the Government creating the opportunity for communities to make a Neighbourhood Plan, was that communities should be permitted to seek a higher level of development where residents feel that is right for their community. This is certainly the case for Stogumber.</p> <p>a) There is a strong consensus amongst residents that the principal reason for creating the Plan is to enable a higher level of development to support the viability of the school, pub, shop and Post Office.</p> <p>The WSLP provides for development of around 10% growth in the number of dwellings in the Primary Villages, and it states that the number of dwellings in Stogumber village is currently 164*. The WSLP therefore envisages an increase of around 16 or 17 houses over its term of 16 years (from adoption in 2016 to the end date of 2032) which equates to roughly one each year.</p> <p>The discussions and consultations during the drafting of the Plan arrived at a consensus that an increase 50% greater than that envisaged by the WSLP would be right for Stogumber, in balancing the benefits of additional development with the problems that may arise in growing too quickly. The additional 14 houses proposed for Stogumber village over the 10 year term of our Plan equates to roughly one and a half each year, although much of actual development is likely to be in groups rather than single houses.</p> <p>* <i>The 2011 Census data gives the number of dwellings in Stogumber village as 181.</i></p>

We do not know of any way to *prove* that any particular level of development would *ensure* the viability of these specific essential services in this particular small rural community.

There may be formulae that are considered reasonably useful for very large developments (eg. so many houses / bedrooms = so many primary school places required) but it does not seem possible to apply such formulae to such small levels of development in such a small settlement. In practice, much depends upon how the individual services are run and the use that individual residents make of these services.

For example, we know that a shop that is owned and run by a couple living together above the shop will be viable at a lower turnover than a shop owned by one person living elsewhere and who has to employ additional staff.

However, the difficulty of evidencing should not preclude the common-sense conclusion that having more residents living close-by will aid the viability of a village shop. Nor do we know of any way of *evidencing* the social capacity of a community to grow, other than through thorough consultation with its residents, which we have done and submitted the results.

As described under 6 above, we know that there is sufficient previously developed land (plus residential gardens and land occupied by agricultural buildings - see 10 above) to accommodate this level of development, and there may also be particular potential developments where the use of greenfield may be justified.

Many of the non-domestic buildings in the village have already (and recently) been converted, but a handful of older buildings remain where conversion may be viable, plus conversion or replacement of modern farm buildings within or in close proximity to the village.

b) * We had changed affordable housing part of this policy twice to reflect the legal back-and-forth that followed the Ministerial Statement, and then agreed with WSC that we would leave it until the Examination and then amend the policy to reflect the position at that time. We agree that the threshold should be 5 to reflect Stogumber's status as a recognised rural settlement. In moving from a threshold of 3, where a requirement for 33% affordable housing works well mathematically, to a threshold of 5, we would be happy to change the requirement to 35% to match the WSLP.

The justification for requiring onsite provision of affordable housing is that we have seen in Stogumber the disadvantages in terms of community divisions when affordable housing is concentrated in one location. Also, we have seen in a neighbouring parish the difficulty in finding an appropriate additional site on which to build affordable housing financed by contributions in lieu. Requiring onsite provision, where this conforms to national policy, ensures that the affordable housing is actually provided promptly in the community that needs it.

The second part of the second paragraph was intended to mean that a development that would take place on two sites could be treated as if it were on one site for the purposes of this policy, with the affordable housing concentrated on one of the sites, where this would be justified. The intention is to create the potential for more flexibility in how the policy is applied, and increase the likelihood of a developer providing the affordable housing rather than money in lieu.

c) We consider that the Rural Housing Project (based at the Exmoor National Park Authority) report is a reasonable basis for identifying local housing need, but we agree that the policy could be amended to refer to the most recent assessment available.

Ann Rhodes has kindly obtained the current 'Somerset Homefinder' data: as of 21st March 2017 there are a total of 561 registered applicants, five of these currently live in Stogumber Parish and are seeking affordable Housing. Of the 561, three have selected Stogumber as their First Choice Parish for re-housing. One has a one-bedroom need and two have a two-bedroom need.

d) We have seen in other 'made' neighbourhood plans policies that guide lettings, such as the Bembridge (Policy H3), Lynton and Lynmouth Neighbourhood Plan (Policy H2) and the St Ives Neighbourhood Plan (Policy H1).

e) We have explained that our reason for seeking a level of development a higher than that envisaged by the West Somerset Local Plan is to support the viability of the essential facilities and services which we retain. These services must be retained in order to maintain the sustainability of the community. If the dwellings built under this policy are not principal residences, and are occupied sporadically and often only at weekends or holidays, they will do little to support the viability of the essential services, least of all the school. In other words, the purpose in allowing the development is to maintain a sustainable community. This is in accordance with Policy SC1 of the West Somerset Local Plan:

"LIMITED DEVELOPMENT IN THE PRIMARY VILLAGES: BICKNOLLER, CARHAMPTON, CROWCOMBE, KILVE, STOGUMBER, STOGURSEY, WEST QUANTOXHEAD AND WASHFORD, WILL BE PERMITTED WHERE IT CAN BE DEMONSTRATED THAT IT WILL CONTRIBUTE TO WIDER SUSTAINABILITY BENEFITS FOR THE AREA."

In other words, the policy is not a response to an already high level of second homes in the village, but to ensure that new homes built in the village deliver the sustainability benefits that justify their construction and which are sought by our Plan and by the West Somerset Local Plan.

f) We have identified the following evidence of houses sizes:

A. The Government commissioned research in 2010 to find out the sizes of new dwellings being built. Here are the findings:

Typology	GIA	NIA	Habitable	% of NIA relative to GIA	% of Habitable relative to NIA	Storage	Utility	Kitchen	Notional Corridor*
All Tenures									
Studio	31.94	25.05	19.44	77.93	77.38	0.43	0.46	3.81	1.84
1BF	46.32	36.54	26.27	78.30	73.60	0.69	0.49	6.06	1.49
2BF	59.11	46.58	35.61	77.55	77.60	0.70	0.53	6.45	1.69
3BF	89.62	71.12	57.53	79.53	79.79	0.92	0.36	8.27	1.70
1BH	69.06	36.01	23.74	58.24	73.25	1.21	0.50	5.27	2.31
2BH	69.16	50.86	36.96	72.84	75.95	1.15	0.60	6.85	3.20
3BH	92.05	67.55	51.23	72.10	77.98	1.70	0.83	7.84	2.54
4BH	116.96	81.71	67.07	69.45	81.55	1.59	0.95	8.69	1.79
5BH	158.65	111.66	90.78	69.54	82.37	4.12	3.54	10.25	1.88

1BF = 1 bedroom flat

1BH = 1 bedroom house

etc

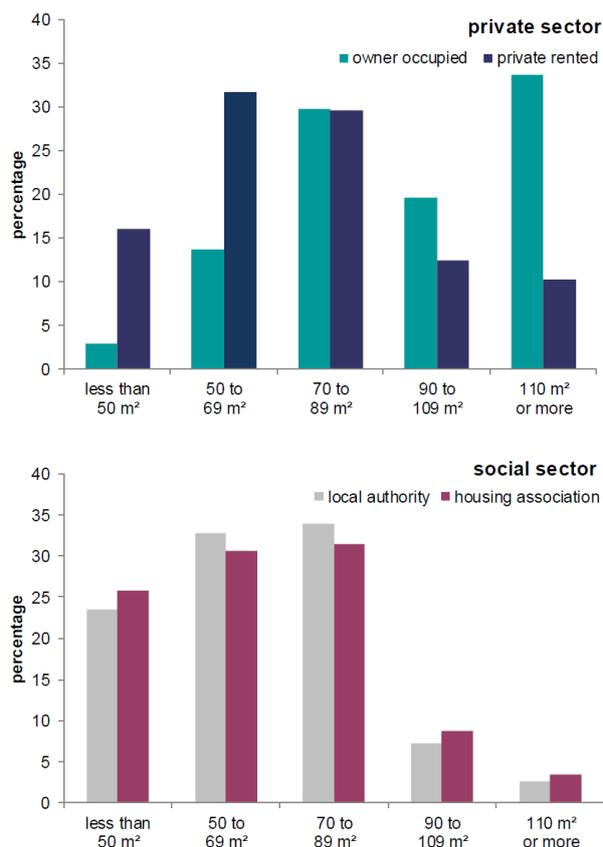
<http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/files/dwelling-size-survey.pdf>

This study shows that in the sample taken, the average size of all dwellings of four bedrooms or fewer was less than 100sqm NIA.

B. The English Housing Survey 2015-16 (point 2.8 on page 27 and Figure 2.4 on page 28)

“The average (mean) usable floor area of dwellings in 2015 was 94m². Homes in the social sector tended to be smaller (67m²) than homes in the private rented sector (76m²). Owner occupied homes (108m²) were larger than social and private rented homes.”

Figure 2.4: Usable floor area, by tenure, 2015



Base: all dwellings
 Note: underlying data are presented in Annex Table 2.1
 Source: English Housing Survey, dwelling sample

‘Usable floor area’ is defined on page 57 and appears to be similar to NIA.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/595785/2015-16_EHS_Headline_Report.pdf

These studies suggested to us that a policy requiring an average NIA of 100sqm across a whole development would be in line with the national average of 94sqm (for all existing homes) and greater than the average

	<p>for (all but 5 bedroom) newly constructed homes. We therefore concluded that 100sqm was at least reasonable, and possibly generous.</p> <p>The reason for removing permitted development rights for extensions is that a policy seeking to rebalance the local housing stock in terms of size would be much less effective if all the houses built under the Plan could be immediately and significantly extended. There would even be the risk that houses were built in such a way as to facilitate extension, and marketed as such. If this happened, the available housing stock would remain unbalanced, with a disproportion of larger houses, and <i>that</i> would reduce the opportunities for younger and/or less prosperous families being able to move into the village.</p> <p>g) It is not the intention that self-build housing, whilst very welcome, would be treated differently, and we agree that the paragraph could be deleted.</p>
18.	<p>Policy C4 Live-work *</p> <p>We agree that this policy could be deleted.</p>
19.	<p>Policy C5 Residential Institutions for Older and Disabled People *</p> <p>a) We agree that ‘supported’ means ‘approved’.</p> <p>b) We agree that the term ‘residential institutions’ should be clarified as suggested by the Examiner, and reference could be made to use class C2.</p>
20.	<p>Policies C6 School, C7 Village Hall and C8 School and Village Hall site</p> <p>In considering this Policy, it may be helpful for the Examiner to know that the Parish Council would <i>gift</i> (probably leasehold) land in Beacon Field for a new Village Hall or School, which would make such a development more financially viable than if a site had to be bought.</p> <p>a) We agree * that these three could be combined into one policy.</p> <p>b) With the physical constraints of the site, and the need to retain the Playing Field next to the Village Hall and School, it would not be possible to have enabling development <i>and</i> an extended Village Hall on the same site. If there were to be enabling development, the Village Hall would have to relocate to make room for it, and if the Village Hall (whether or not extended) were to stay on the site, there would be no room for enabling development. One of the reasons for buying Beacon Field was to create the scope for the Village Hall and/or the School to expand, which would otherwise be impossible without sacrificing the Playing Field.</p> <p>c) At the present time, it appears that the School intends to remain on the current site (but it had been considering moving and may consider it again within the Plan period). A project team has been formed with the aim of building a new Village Hall on Beacon Field, and handing the current Village Hall to the School, which would make great use of the large hall (compared to their classrooms) and stage and the large kitchen. But it is very early days and the Plan cannot assume the project will succeed, and the Plan must allow for other solutions.</p> <p>One concern is that the Church of England Diocese of Bath and Wells, which owns the Village Hall and Playing Field, has tended to sell property in this and neighbouring parishes but not invest the proceeds in the villages. For example, the Diocese has recently sold the Rectory in Stogumber for over £400,000 but contributed nothing to the ongoing maintenance of the Village Hall nor the large Grade 1 listed Church in Stogumber, both of which it owns; in neighbouring Williton it sold the vicarage, then knocked down the church hall (used by Scouts etc) to build a new vicarage, without contributing towards the project to build a village hall in Williton.</p> <p>Therefore, this policy in our Plan aims to facilitate enabling development where all the proceeds will be used for new School and/or Village Hall buildings, such that any part of this important community site that is ‘lost’ to enabling development would be ‘regained’ in the form of new community facilities.</p> <p>d) and e) The third bullet of Policy C8 could now be deleted, because, as the Examiner notes, we have planning permission and are making a start on the permanent car park in Beacon Field. And realistically, if there is enabling development on the site to contribute to the cost of moving the School and/or Village Hall to Beacon Field, we cannot really expect to also get new community facilities on the old site too.</p> <p>f) If the Lottery were to provide such funding on the village that enabled the Village Hall to have a splendid new building on Beacon Field without enabling development, then this point was intended to ensure that the Village Hall site was used to provide some other benefit to the community. The present hope is that it would be made available to the School. Similarly that if the School relocated (which at present does not seem likely) without the need for enabling development, the School site would be found another community use, perhaps to enable a larger Village Hall to be built.</p>
21.	<p>Policy C9 Existing Public Open Spaces *</p> <p>a) The Public Open Spaces listed in the Plan are owned as follows:</p> <ul style="list-style-type: none"> • Playing Field (below village hall): Diocese of Bath and Wells • Playground (behind Slade Close): freehold owned by Magna, with a lease to the Stogumber Playground Association, of which the Parish Council is the managing trustee and the National

	<p>Playing Fields Association is the custodian trustee, but it has been agreed by the parties mentioned and by the Charity Commission that a new lease will shortly be granted to the Parish Council, and the Association will be wound-up.</p> <ul style="list-style-type: none"> • Churchyard: we are not quite clear whether it is legally the Diocese of Bath and Wells or the Rector but anyway, it is owned by some manifestation of the Church of England. • The Square: part owned by Somerset County Council as the highways authority, and part owned by the Parish Council. • Top of Beacon Field as indicated on the map: Parish Council. • Community orchard: Parish Council. <p>The cricket ground is not listed as a Public Open Space because it is owned by the Stogumber Cricket Club, which is a private members club. In practice the club is very welcoming and engaged with the community, but it objected to the cricket ground being included in the list of public open spaces in an earlier draft of the Plan.</p> <p>We understand the general desirability of avoiding policies in a neighbourhood plan that are very similar to policies already in the corresponding local plan, but it is desirable that Stogumber residents voting in the referendum on the Plan can see that the additional development that would result from the Plan is balanced by protection of important public amenities such as open spaces. The WSLP does not specify the particular public open spaces in Stogumber that would be covered by its policy.</p> <p>An alternative approach might be a policy or supporting text that specifies the particular public open spaces to which the WSLP and/or NPPF policy would apply.</p>
22.	<p>Policy C10 The Beacon Field *</p> <p>We agree that the number of references to ‘the Beacon Field’ can be reduced!</p> <p>a) to c) In fact, the whole policy could be clearly expressed, possibly as follows:</p> <p>The Beacon Field is divided, as shown on the Stogumber Features Map, into two parts:</p> <ul style="list-style-type: none"> • The lower part, currently public open space, and intended for the future development of community facilities. Full planning permission has already been granted for a permanent car-park. • The upper part, including the Jubilee Copse and Community Orchard, currently and intended to remain public open space or community horticulture such as allotments. • Both parts can currently be used for occasional car-parking for large events, and it is intended that such use will continue into the future, albeit limited by any development and tree-planting that takes place. <p>[The above seems more explanatory than policy, and so perhaps needs to be incorporated into revised supporting text?]</p> <p>Permission for development on the lower part of Beacon Field will be granted where the development is of buildings or facilities of benefit to the community, such as (but not limited to) a new village School or new Village Hall, subject to... [the criteria / over-arching policy; see 3 above]. Development should enable and where appropriate facilitate vehicular access to the upper part of the field and to the proposed new graveyard in the adjoining field.</p> <p>Permission for a building on the upper part of the field will not be granted except for purposes that directly improve the use of the land as public open space or community horticulture.</p> <p>d) Initial work on the access to the car park has been completed, but the major work to create an access to highways authority standards (visibility splay, tarmac, drainage, etc) is expected to start in the next month or so, when the weather is a little drier. As funds stand at the moment, putting down the hard surface will have to wait, but successful grant applications could quickly accelerate that. Fortunately, the field is naturally well-drained so car-parking would be possible for much of the year even without the hard surface.</p>
23.	<p>Policy C11 Car Parking *</p> <p>We agree that the first and last paragraphs of this policy could be more clearly expressed.</p> <p>a) There is not a specific proposal for an additional car-parking area in addition to the permanent car park being developed in Beacon Field. However, if as part of another development, perhaps redevelopment of the Village Hall and/or School site following relocation, additional car-parking space were proposed (beyond what is directly required by that development) it would be our wish that permission be granted. The need for parking in Stogumber is pretty desperate.</p> <p>b) We think an assessment would be relatively straightforward, in that it is known in which areas of the village there is currently a severe shortage of car-parking for residents, and the areas of the village where there is a great shortage of car-parking for people using the services located there (eg. close to the Church, shop and pub). In fact, even those areas (such as those around the eastern end of Station Road) where houses have off-street parking and there are no services that attract visitors, there is still such pressure on</p>

	<p>car-parking that the Highway Code is routinely breached. Indeed, the phrase ‘readily used by residents and visitors’ is almost redundant.</p> <p>c) We agree that contributions towards the provision of car-parking (on or off the development site itself) could only be required only to the extent that a development generates additional need for car-parking, and not to resolve an existing problem, and hence the introductory text also needs to be amended.</p> <p>With the deletion of three of the criteria will in any case be deleted (see 5 above) and the deletion of the final paragraph, we suggest the policy could be reworded as follows:</p> <p style="padding-left: 40px;">Development must include sufficient off-street car parking spaces to meet the demand generated by that particular development. Permission for additional car-parking spaces, beyond the minimum number required, will be granted subject to Policy O1.</p>
24.	<p>Policy C12 Essential Services *</p> <p>We agree that this policy could now be deleted, as the now-adopted WSLP provides sufficient protection of these essential services.</p>
25.	<p>Policy C13 Church *</p> <p>The draft wording here may have been unclear. The Policy is not intended to influence decisions made outside the LPA process (ie. those made through the DAC and <i>faculty</i> process) but the Policy is intended to apply to any planning application in relation to the Church that were to be made to the LPA. Here is a suggestion as to the wording:</p> <p style="padding-left: 40px;">In circumstances where the consent of the local planning authority is required, sensitive changes to the fabric and furnishings of Stogumber church will be permitted to support community use provided that they do not detract from its architectural or historic importance.</p>
26.	<p>Policy EC2 Visitor Accommodation</p> <p>a) Aside from the repetition of the criteria (see 6 above) there are a couple of meaningful differences in the policy towards the three types of accommodation given, to ensure that developments of self-catering are distinct from dwellings and will remain as such, and that ‘glamping’ sites can be undeveloped and not linger as eye-sores.</p> <p>b) We <i>definitely</i> and <i>firmly</i> intend this to be a positive policy that supports the provision of tourist accommodation, which is so important to the local economy. Perhaps this has been obscured by the (largely repeated) criteria intended to reassure residents who might otherwise fear the impacts of such development and so vote against the Plan at the referendum. This may be resolved by the deletions proposed in 5 above.</p> <p>c) The policy does not restrict self-catering units only to locations specified in EN2, because the first bullet permits the conversion or re-use of existing buildings to self-catering units [regardless of their location in relation to EN2] and so the use redundant farm buildings would, for example, be perfectly possible and quite likely desirable.</p> <p>However, new-build permanent self-catering accommodation is indistinguishable from a permanent dwelling, apart who happens to be occupying it at a particular moment, and so the reasons for restricting development of dwellings outside of settlements largely apply to the development of self-catering accommodation. For a variety of reasons, we do not think it desirable that new-build permanent self-catering accommodation be built in open countryside unrelated to existing settlements.</p> <p>The restriction in floor area is intended to discourage applications for ‘self-catering accommodation’ that is really intended to be used (with or without permission for change of use) as a dwelling. Whilst there is some demand for self-catering accommodation for larger groups, this usually appears to be met through the provision of a number of smaller units that can be booked together or separately as required, and often with some communal facilities are also provided. With reference to the 2010 Government study quoted in 17f above, an NIA of 80sqm is equal to the average size of a new-built permanent four-bedroom dwelling. And people on holiday do not generally need as much as they occupy in their permanent accommodation, with all their accumulated possessions. Taking into account all of the above, 80sqm seems to us a reasonable and quite possibly generous cap.</p> <p>d) It appears from the Examiner’s query that we have drafted the 6th bullet unclearly. We do not seek to limit the <i>total</i> use of self-catering accommodation to 28 days in any year, and nor do we wish to restrict a <i>particular</i> unit of self-catering accommodation to a <i>particular</i> person.</p> <p>However, we <i>do</i> aim to limit to 28 days the occupation of a particular unit of accommodation by a particular person, so that that particular unit does not become the permanent home of that particular person, which would remove it from the stock of self-catering holiday accommodation available in the Parish.</p> <p>e) The figure 5 was chosen to accord with the Natural England exemption for caravan site for up to 5 caravans. Removal of the temporary structures after the use visitor accommodation finishes would ensure</p>

	that the structures did not become (with or without adaptation) permanent dwellings, and do not become derelict eye-sores.
27.	<p>Policy EC4 Agricultural Land</p> <p>a) The grading of the agricultural land in the Parish does not reflect the importance of agriculture to the economy and community of the Parish, and to the landscape character of the Parish. Also, grade 3a and grade 3b land is not distinguished on the map for Stogumber, and so it seems to us odd to have a policy that makes such a distinction.</p> <p>b) An example of an additional or mixed use that would adversely affect the agricultural viability and productivity of the land would be large ground-mounted solar arrays, beneath which sheep grazing is supposedly possible but which seems to happen little in practice, and which prevent the use of the land for the full range of other and more productive agricultural purposes that would otherwise be appropriate for that land. There is little agricultural land in the Parish that is <i>only</i> suitable for light sheep grazing.</p>
28.	<p>Policy EC5 Agricultural development *</p> <p>We agree that the criteria can be de-duplicated (see 3 above).</p> <p>a) This policy relates to the NPPF paragraph 28, second bullet.</p> <p>b) A tie or Section 106 agreement may be appropriate for smaller holdings (where the development or diversification envisaged is not permitted development) to ensure that the business and holding remains one, to avoid fragmentation.</p>
29.	<p>Policy EC6 Re-use of agricultural buildings *</p> <p>a) Modern steel-framed agricultural buildings are in themselves likely to be suitable for a variety of commercial uses (subject to site-specific considerations) and conversion to such uses will maintain the amount of employment space in the Parish (NPPF paragraph 100, first bullet). Whereas older stone, brick and cob buildings tend to be smaller overall and/or comprise smaller enclosed spaces, and the expense of conversion to commercial use will often <i>not</i> be justified by the income that can be earned from this use. Whereas, conversion to residential use, albeit at a higher cost than for commercial use, is likely to yield a higher value, and thus be a means to re-use buildings that contribute towards the character of the Parish (whether or not they are listed).</p> <p>b) This preference would not apply to sites within or in close proximity to Stogumber village (EN2) where other uses may be more appropriate, and we would agree that the policy could be amended to make this clear.</p>
30.	<p>Policy EC7 Dwellings on new holdings</p> <p>a) We agree, and suggest the sentence could be reworded as follows:</p> <p style="padding-left: 40px;">Where the viability of holding business would be significantly compromised without the ability to live on site, but such an essential need is not yet proven, a temporary consent may be granted for dwellings designed to be of low environmental impact in construction and use, and which readily capable of removal.</p> <p>b) We suggest 3 years (as in the old PPS7).</p> <p>c) The landscape and built character of the Parish is of an "... area [that] is densely settled with a dispersed pattern of hamlets and scattered farmsteads linked by sunken winding lanes." (Vale of Taunton and Quantock Fringes National Character Area) but the consolidation of farms and the sale of old farmhouses (and the sale of the County Farms) mean that the social and economic structure of farming in the Parish has shifted away from its historic pattern. Enabling dwellings on new holdings would help re-assert the form of farming that gave the Parish its character.</p> <p>d) Here is an example:</p> <p>Appeal Ref: APP/D0840/W/15/3132813 (Slight Hill, Heamoor, Penzance, Cornwall TR20 8UJ) paragraph 11:</p> <p>"The Council argue that it would be possible for a worker to reside in the local area where property is readily available to buy and rent. However, given that there are no available properties in the immediate vicinity of the appeal site, I am not persuaded this would enable the appellant to respond adequately to emergencies when they were to occur. Additionally, the business is in its infancy and is being operated on a subsistence basis with most spare capital being ploughed back. It is therefore inconceivable that the business could afford to pay out an additional £600-700 per month in rent or mortgage payments and continue to trade. The appellant and his family would therefore be without an income and the business that has been built up over the last two years would cease. This would be contrary to the Framework's aim of promoting the development of agricultural businesses and supporting a prosperous rural economy. I do not therefore consider that the functional need could be satisfied through other accommodation."</p>
31.	<p>Appendix 2 *</p> <p>We had intended to retain the Census data in Appendix 2 once the Plan is 'made' because it may help some people reading the Plan to gain an understanding of the Parish through these statistics, in the way that other people reading the Plan may find the photographs and descriptions in Appendix 1 a good way to gain</p>

an appreciation of the Parish. Nevertheless, we agree that Appendix 2 could be deleted when the Plan is 'made' if that is the advice of the Examiner.

Incidentally, we had thought of moving Appendix 1 (the appraisal in words and pictures of the character of the Parish) to the front of the Plan as a 'prologue' which would give an effective context for the actual text of the Plan, if this would be acceptable to the Examiner.