

Cannington Parish Council
Community Room
Village Hall
Brook St
Cannington
TA5 2HP
21 February 2025

Somerset Planning – North Team
Bridgwater House
King Square
Bridgwater
TA6 3AR

Planning Application: 13/23/00032 (As amended)
Applicant: Strongvox Homes
Proposal: Erection of 160 dwellings, creation of vehicular, pedestrian and cycle access, public open space, landscaping & assoc. works
Location: Land East of Brymore Way, Cannington

1. The objection to this application Cannington Parish Council (CPC) lodged on 14.2.24 remains based on concerns set out in this response under the following policies within the Sedgemoor Local Plan 2011-2032 (adopted 20.2.2019): -

- a) S2 – Scale of new development
- b) S3 – Infrastructure Delivery
- c) S4 – Sustainable Development Principles
- d) S5 – Mitigating the Causes and Adapting to the Effects of Climate Change
- e) T2a – Tier 2 Settlements – Housing
- f) T2b – Tier 2 Settlements – Unmet Local Housing Need
- g) D1 – Flood risk and surface water management and surface water drainage
- h) D6 – Affordable Housing
- i) D13 – Sustainable Transport and Movement
- j) D14 – Managing the Transport Impacts of Development
- k) D19 – Landscape
- l) D20 – Biodiversity and Geodiversity
- m) D21 – Ecological Networks
- n) D22 - Trees and Woodland
- o) D23 – Bat Consultation Zones
- p) D24 – Pollution Impacts of Development
- q) D25 – Protecting Residential Amenity
- r) D26 – Historic Environment
- s) D27 – Education Provision
- t) D28 – Health and Social Care
- u) D29 – Protection and Enhancement of Existing Green Infrastructure Resources
- v) D30 – Green Infrastructure Requirements in New Developments
- w) D31 – Countryside around Settlements

2. CANNINGTON'S NEIGHBOURHOOD PLAN (NHP)

- 2.1 The Cannington Neighbourhood plan is at a very mature state. The Plan is at the Examination stage and is currently being tested against the Basic Conditions. The Examiner will be looking at the extent of unresolved objections. It is anticipated that the NHP will go to referendum in May 2025. As such greater weight can be materially attributed to the Plan at this stage (National Planning Policy Framework, paras 48 & 49).
- 2.2 CPC refutes Section 3, SQRP that states "A Local Neighbourhood Plan currently underway, although this has not reached a sufficient point to attach any weight to" and suggests the SQRP review the application considering the mature state of Cannington's NHP.
- 2.3 Aside from the significant progress made since December 2022. Arguably, were it not for the upheaval and subsequent resource implications to the formation of Somerset Council, the NHP may well have been approved by now.
- 2.4 Feedback from residents at the very well attended public meeting on 29.1.24 made several references to the NHP (familiar and wholly supportive of its contents) and the protection it affords the parish against certain elements within this application.

3. MISSING INFORMATION

- 3.1 Given Policy S4 of the Sedgemoor Local Plan (SLP) and the Environment Act 2021, making biodiversity net gain mandatory, where is the Biodiversity Net Gain Report referred to in the submitted Ecological Impact Assessment (EIA) prepared by ETHOS (para 1.3). **CPC notes this is still outstanding from its original response of 14.2.24.**
- 3.2 The SQRP and the Somerset Ecological Services (SES) group both refer to a Habitat Regulations Assessment. Indeed, the SES raise significant concerns in their consultee reply regarding bat foraging, commuting and lighting. No Habitat Regulations Assessment is available on the planning portal (as at 3/2/25).
- 3.3 The landscape appraisal update makes no reference to the inclusion of three storey dwellings. In addition, the landscape officer makes several recommendations on improvements to landscape design. This is another area that the SQRP should review.

4. POLICY T2A – TIER 2 SETTLEMENTS - HOUSING

4.1 Principle of development

We are not, as a parish council, opposed to development taking place in the village as demonstrated by the achievement of 107 dwellings of the required 150 (minimum) to be delivered within Cannington between 2011-2032 of the SLP; with 7 years remaining to fulfil the obligation for the remaining 43 dwellings (as of 3/02/25 – see Planning Policy consultee response). This is an extra 117 (78%) dwellings above the minimum requirement for the indicative scale of growth for Cannington.

4.2 Policy T2a

Policy T2a for a Tier 2 settlement outlines a set of criteria which states "proposals outside of the settlement boundaries that meet ALL of the criteria will be supported".

We object to the application as it does not meet all the criteria, and in particular, the size and scale of the development as outlined below.

Criteria 1

The SLP requires that strategic housing developments are identified and come through either the allocation process or NHP plan (Policy S2).

- (i) This site is not identified as an opportunity site within the Strategic Housing Land Availability Assessment (SHLAA) published on the Somerset Council website, nor is it within Cannington's NHP.
- (ii) The application land is identified in the SHLAA as land at Henfields Farm and Withiel Farm. It is clearly labelled as greenfield and falls into the category "rejected sites outside settlement boundaries". Figure 1 H005 Henfields Farm and Figure 1,1 H492 Land at Withiel Farm refers. Specifically, site H492 was rejected as "when considered in its entirety, it was considered to be poorly related to the existing built-up area of the village and considered in isolation would form an illogical extension to the village". The creation of the bypass does not offer mitigation for the reason this site was rejected as part of the review in 2016, explained in more detail in Criteria 3 below.

Criteria 2

The scale of development should be appropriate to the size, accessibility, character and physical identity of the settlement.

- (i) As stated in the SQRP the material impacts of overprovision would be a significant issue in the approval of the proposed development. The impacts of such overprovision and scale of the development are clear from the Regulation 16 responses to the Cannington Neighbourhood Plan specifically for primary education and health care services. Additionally, weight to the impact to the primary health care services has been provided by the Practice Manager and GPs that service Cannington Health Centre, the limited public transport facilities and that the secondary school (Brymore Academy) is not co-educational
- (ii) Accounting for the residual need of just 43 dwellings over the next 7 years (on average 6 homes per year) it is therefore not within policy as the benefits do not outweigh the significant impacts of the overprovision and scale to existing residents of Cannington.
- (iii) This application is to build 160 dwellings to the west of Cannington. This represents a 16% increase in housing, a 20% increase in population and a 270% increase in growth (from the residual figure of 43 to 160) thus failing to respect the scale and character of Cannington which will greatly change the nature of the village and cannot be justified. This aspect alone contributed to an overwhelming level of objection from residents.

- (iv) The community has been very clear throughout the evolution of the Cannington NHP Regulation 14 (20/21) pre-submission draft NHP that the by-pass should not provide the new settlement boundary for Cannington. Nb we are now at Regulation 16 but the comments are still valid.
- (v) Throughout the consultation process, 'the ridgeway' (northern ridgeline) was identified as an important landscape feature/area of visual landscape quality (important to green infrastructure, landscape value, views, setting, biodiversity/habitat, public realm, air quality and character) that should be protected from development". There are some parallels with this application to 50/20/00054 and the amended 50/24/00021. A precedent has been set here. We would hope the same consideration will be afforded to the determination of this planning application as with 50/24/00021; below is an extract from its Design and Access statement: -

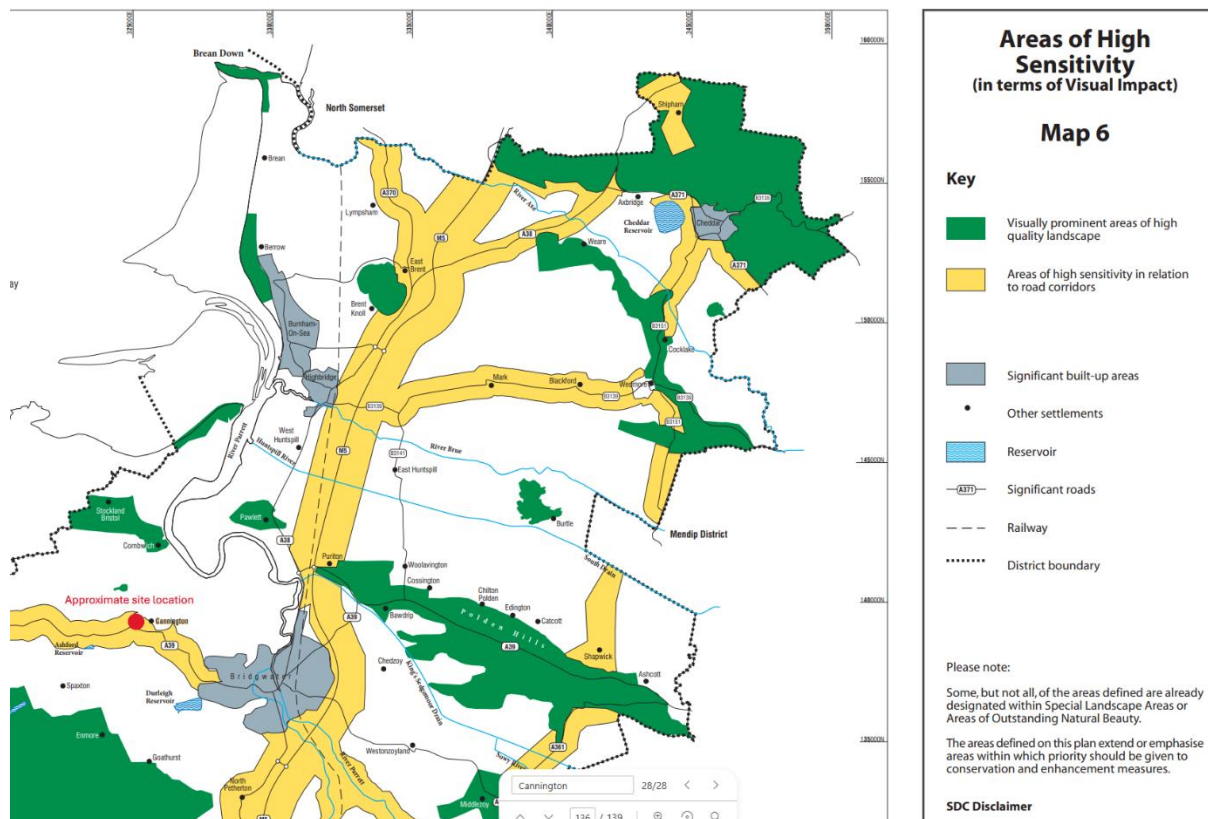
*"This Design and Access Statement and Planning Statement is for a proposed development on Land at Combe Batch, Wedmore, where a previous application was submitted (application no: 50/20/00054) and determined as refused at planning committee on 13th February 2024. **The reason for refusal is as follows. 'The proposed development is in a prominent location by reason of its elevated position and location on the rural edge of the settlement which would detrimentally impact on the transitional rural approach to the village. The infilling of development along the frontage of Wells Road as proposed, due to the elevated position, would result in an urbanizing appearance, out of keeping with the rural character of the furthest extent of the Conservation area impacting on the appearance of this edge of settlement site. The development would therefore conflict with paragraph of the NPPF, Local Policies D2 - Design, D19 - Landscape of the Local Plan, D26 - Historic Landscape, and NHP Policy WED5 Design'. This document supports a new, revised application which seeks to amend plots 25 - 30 [to lower the roofs] along the southern boundary of the site adjacent to Wells Road, to address the reason for refusal and to inform local policy D2, D19, D26 and Wedmore Neighbourhood Plan Policy WED 5.***

- (vi) CPC notes the Developer has only provided limited cross section views. **We request wire framed landscape illustrations** so a more complex assessment of the impact of the development can be considered. For example, in parallel to three dwellings on Chad's Hill in an elevated height of 40m, plots 22 to 24 are at a height of 41m. It is disappointing to note the SQRP did not recognise this omission and suggest their inclusion.
- (vii) The introduction of dominant 3 storey dwellings which will be visible from all aspects is rejected and unacceptable. This is unwanted and unwarranted urbanisation, totally out of character with the rural aspect of the village. The 3 previous planning applications for Cannington that included anything over two storey dwellings, were objected to, a decision upheld as they were removed from the developments.
- (viii) The 'ridgeway' is also of historical significance as referenced in the Cannington NHP, reference 2.33 "The name of Cannington first appears in the Saxon Charters circa 880 as Cantuctone. 'Cantuc' was a British name for a ridge and 'ton' a village, so the meaning of the name is Quantock Village (the Quantocks being the nearby range of hills). By Saxon times the settlement had moved to the present village site. There are

no Saxon structures remaining, though it is possible the present church is on the site of a wooden Saxon church. The spelling 'Cannington' as it today appeared around 1641.

- (ix) The Sedgemoor Landscape Assessment and Countryside Design Summary (Revised 2003), Section 6.68 states "Within the larger settlements the massing of the buildings of high density in the centre, with lower density on the periphery is typical: with buildings a maximum of two storey at the edge and three in the centre. Soft edges to such settlements are typical, through the traditional planting of orchards and back gardens with tree planting and hedgerow trees. Some recent housing developments at Cannington and Nether Stowey in particular, have been carried out with a lack of sympathy to local settlement patterns. This has included the creation of 'left-over' spaces at the entrance to new development, the creation of new raw, fenced edges to the village, and the use of building materials not found locally.

Site is within an Area of High Sensitivity (in terms of Visual Impact) - Map 6, edited to include approximate location



- (x) The proposed development has considerable impact on views to Cannington due to its elevated position especially from the west and southwest vantage points (from the Quantocks and more dominantly from Charlynch Hill – see photograph below) the PRow and along the A39, a key tourist route.



- (xi) Building on this land will irrevocably damage the local environment, landscape, character and appearance of the village and erode the rural landscape.
- (xii) CPC acknowledges the Examiner's comments around the Visual Landscape Study and will decide on the outcome of that in due course. However, it would be remiss of CPC to not highlight the evidence base collected during the last 10 years of the Neighbourhood Plan does show this is an area of landscape that is held in high regard with existing residents and was an area they highlighted to protect and keep the rural character of the village. Any such development would clearly be in contradiction to this village requirement.
- (xiii) There is no crossing provision to cross on the PRow to access the route to the West and into the wider countryside. This is a key walking route and amenity to provide access to green space for many within the village.
- (xiv) The site and associated PRow form a key recreational amenity that provides existing residents with access to wide open space and countryside, this would be a significant loss.

Criteria not met.

Criteria 3

The development should be well related to and complement the existing built form of the settlement, providing opportunities for walking and cycling to local services and facilities.

- (i) The majority of the application boundary is not well suited to the existing settlement boundary, particular to the north, east and west. Additionally, it does not

complement the existing built form to the south where it imposes on the sanctity of the cemetery.

- (ii) The applicant has changed the layout of the site and type of property designs however we feel that it is essential that the scheme be re-presented to the SQRP to ensure recommendations made have been met appropriately. CPC does not consider that the revised property types complement the existing built form of the settlement of Cannington. For example, the proposal of three storey dwellings (see Criteria 2 (vii)) is not within the types currently in the village and do not reflect the character of Cannington; the positioning of a random singular thatched dwelling adds nothing to the connect.
- (iii) The Unsuitability of Chads Hill and Withiel Drive as Primary Pedestrian and Cycling Routes - The failure to address the fundamental unsuitability of Chads Hill and Withiel Drive as the main pedestrian and cycling access routes into the village centre presents a major planning oversight and their inadequacy is highlighted by the inappropriate SQRP recommendation to incorporate a route through the cemetery. These roads lack the necessary infrastructure to support safe, practical, and accessible non-motorised transport, which contradicts both local and national policies regarding sustainable development and integration into existing settlements.
- (iv) Chads Hill is likely to be the nearest access for services and facilities. The lane is a steep hill, is very narrow and has only one passing place for vehicles and parked cars which may impede pedestrians, cyclists and vehicles. There are no pavements for pedestrians and the road is not wide enough to provide for them. It will not be safe for pushchairs, wheelchairs or mobility scooters. The incline could impede these forms of transport.
- (v) Infrastructure Deficiencies and Safety Risks - There are significant physical constraints that limit any improvements to these roads, making them inherently unsuitable as key active travel routes:
 - Limited Space for Pavements or Cycle Lanes: The narrow nature of both Chads Hill and Withiel Drive makes it unfeasible to add dedicated pedestrian walkways or cycling infrastructure.
 - Lack of Adequate Lighting: Poor or non-existent lighting creates serious safety concerns, particularly during the winter months when daylight hours are limited. This discourages walking and cycling and increases the risk of accidents. Lighting of these key routes should be of key importance to the prevention of crime strategy (as per Avon & Somerset Constabulary Consultee response)
 - Increased Traffic and Conflicts: These roads already serve as access points for vehicular traffic, and their unsuitability for shared use with pedestrians and cyclists creates further dangers, exacerbating conflicts between different transport modes.
- (vi) Policy Contradictions and Poor Settlement Integration - The lack of safe, direct, and practical non-vehicular access undermines core principles of planning policy:
 - Local Development Plans and National Planning Policy Framework (NPPF) advocate for sustainable integration of new developments into existing

- settlements. New housing should provide viable walking and cycling connections to services and amenities rather than relying on car dependency.
- Active Travel and Carbon Reduction Goals: The government's active travel strategy and commitments to reducing car usage are at odds with the reality of this development, which forces residents to use cars due to the absence of practical walking and cycling routes. Public transport connections are grossly inadequate for commuting and recreational purposes, not even connecting to railway links. (See Appendix 1 - Bus timetable for Cannington).
 - Accessibility and Social Cohesion: A development that isolates itself through poor infrastructure, rather than blending into the existing community, fails to meet the principles of inclusive growth and social sustainability, as evidenced by the SQRP unsupportable request to utilise the cemetery as a PRow.
- (vii) The Unsuitability of Building Outside Settlement Boundaries - The proposed development extends beyond the natural settlement boundary and further infills the bypass area, which raises multiple planning concerns:
- Further Strain on Poor Infrastructure: Extending development onto the northern and western edges of the village places additional demand on roads that are already inadequate for sustainable travel.
 - Lack of Strategic Planning: Rather than following a logical pattern of expansion that supports existing infrastructure, this type of development isolates itself from the village centre, making it functionally disconnected.
 - Bypass Concerns: While the bypass offers modern road infrastructure, it is unlit, and by its nature bypasses the village therefore it only serves to reinforce car dependency. Using this as a justification for development ignores the broader issue of poor accessibility.
- (viii) Better Alternative Sites Exist - Rather than promoting development in areas where integration is poor and infrastructure is lacking, better strategic options should be considered:
- Existing Development Areas in Cannington: There are sites with recent development history that already benefit from established connections to the village centre, with pedestrian pathways, lighting, and public transport access (albeit with limited services).
 - Sustainable Growth Patterns: Future expansion should focus on locations where active travel infrastructure is already in place or can be feasibly enhanced, ensuring alignment with policy and sustainability goals.
- (ix) The revised plans do not provide opportunities for safe walking and cycling to local services and facilities. Whilst there may be improved circulation routes and pedestrian connectivity within the boundaries of the site, this does not address the access to and from the site from the surrounding area. Mention is made of the possibility of a path parallel to Chads hill, but no detail for options is given nor the traffic calming referred to.
- (x) CPC does not accept the suggestion of opening a path through the Cemetery. The path through the Yew trees and the other path in the new cemetery are the only routes for funeral corteges. This is a special area of quiet reflection for those whose

loved ones are buried there. Commonwealth War Graves are also within the cemetery. This is not a place that should become a thoroughfare for pedestrians, dog walkers (especially those who do not pick up after their dogs) cyclists or other non-motorised traffic. It is also unlit. The Avon and Somerset Constabulary consultee response clearly recognises this proposal as a crime and ASB risk. CPC concurs with this view. **This is an insensitive, inappropriate and unsuitable proposal, one that is non-negotiable, both now and in the future.**

- (xi) Access at Withiel Drive, is very narrow. The first 80m is only 4.5m wide which then increases to 6m further along. It is not wide enough for opposing traffic. It has no pavements for pedestrians and pushchairs, and no provision for wheelchairs or mobility scooters. It would appear the barrier baskets as proposed originally have been removed.
- (xii) The residents have many valid questions to be asked of the applicant regarding maintenance, access for emergency vehicles, emergency barriers and parking along Withiel Drive. The Fire Access Strategy does not reduce these concerns.
- (xiii) The revised access from Brymore Way to the site adds further safety concerns to the non-vehicular traffic users. This is now a junction with a third lane for turning right into the site. The access to the development cuts the existing cycle path and footpath without a crossing point and the three lanes means that to cross Brymore Way to access the wider footpath network an additional traffic lane must be negotiated.
- (xiv) It is very likely the majority of residents would need/prefer to use their vehicles for local services and facilities – which will undoubtedly add to the villages' significant parking problems, such that it may discourage people from using the village. It is therefore questionable whether the development will be well related to the settlement and may not be easy to integrate into the community.
- (xv) **In conclusion**, infill of the bypass is not a strategic decision, the lack of consideration for pedestrian and cycling access fundamentally undermines the suitability of this proposal and development. Chads Hill and Withiel Drive are not viable routes for active travel, and no realistic improvements can be made to address this. The development contradicts local and national policies on sustainability, settlement integration, and reducing car dependency. A more strategic approach to housing development should prioritise locations with established infrastructure, ensuring safe and practical connectivity with the village centre.

This application does not meet Criteria 3 on the grounds of safety and inadequacy of connectivity

Criteria 4

Development that is likely to have a significant transport impact will be supported by appropriate assessments as referred to under policy D14; D13 also relates.

It should be noted that at the time of this response, both Somerset Highways (which includes a road safety audit, proposed right turn lane, transport technical note and TRO6 GG119 Response) and Somerset County Rights of Way have not submitted their responses.

- (i) CPC and residents have several and serious safety concerns over the primary access on Brymore Way.
- Transport Assessment Data (as at mid-2023, likely to be busier now) clearly demonstrates how consistently busy the bypass is. The average flow of vehicles per day is 6803 (weekday highs are 7200).
 - Vehicles routinely travel at speeds more than 45mph; 85% percentile speeds were 45.5 mph, thus an average 1020 vehicles more than 45mph every day. Worryingly, extreme levels of speed are recorded. On one day only (3.7.23), 209 vehicles travelled at speeds between 50-80mph.
 - A fatality has already occurred on Brymore Way at the junction near Brymore School, on 5.10.22 which was speed related. This junction is 240m from the A39 roundabout that slows the speeds of approaching vehicles – unlike the proposed access to the development which will see much higher speeds.
 - Another non-fatal accident in 2020 occurred when a car pulling out from Chads Hill towards Bridgwater was hit head on by a vehicle overtaking a HPC bus as they both came over the brow of the hill from the opposite direction. Only the quality of the safety features of the car hit saved a fatality. This was the stretch of road where a proposed entry to the development would be. Several other non-reportable accidents and near misses have been witnessed along this by-pass. These are not “accidents waiting to happen” they have.
 - Introducing a junction onto Brymore Way for a development of this magnitude (typically 160 dwellings, 400+ vehicles and up to 500 residents) with restricted visibility from the north due to trees and vegetation planting, is likely to lead to a rise in traffic incidents given the data above.
 - Safety concerns for the current cycle and footpath route, as there is no provision for crossing measures to be introduced. This is well used as a route to Brymore Academy for pupils and staff as well as recreational use for the wider community. Still applicable, the crossing point goes 5+ metres into the junction, but there is no controlled crossing (zebra, lights etc).
 - Residents are concerned that subsequent to the development being built, a need will be identified to install traffic calming measures. If traffic is slowed along the bypass, it could almost certainly lead to an increase in traffic, once again, travelling through the village. Bypass speed limit is 40mph. Given we have introduced a 20mph speed limit within the village the speed limit for the bypass with a critical walking and cycling path will not provide safe routes, especially considering it is unlit.
 - Numerous, regular instances of road traffic accidents on the A39 in both directions, plus the C182 to Hinkley Point have had significant impact to Cannington and the surrounding parishes. An additional circa 400+ vehicles will only add considerable pressure to the network.
 - The applicant has not considered “innovative and adaptable approaches that deliver higher quality and accessible public transport options” as per D13. The only mode of public transport for Cannington is an extremely limited bus service

that could not sensibly provide transport options for commuters, recreation and further education. Therefore, private vehicle(s) will be essential.

- Ghost island improves traffic flow, *but* there are no technical controls to improve safety for the road use e.g. vehicle journeys north, which require a right turn on the brow of the hill opposite a right-hand lane turning into the site.
- The SQRP suggested a car club (this is not feasible in a rural community particularly where employment is spread over a wide geographical area with shift working the norm) and rapid car charging points should be considered as part of this process and could be an innovative selling point for the new homes. CPC doubts this.

This application does not meet Criteria 4 on safety grounds, considerations for those with reduced mobility and no provision of sustainable public transport.

Criteria 6

Contribute to local infrastructure including education, service provision, accessible open space and community facilities

- (i) The letters from the Cannington Health Surgery dated 1.2.24 and 20.1.25 strongly objected to this proposal on the grounds of capacity, health and well-being. This is the actual reality of the situation, a fact overwhelmingly in accord with representations made to the Parish Council from Cannington residents and beyond. It should also be noted that Cannington Health Centre serves residents from local parishes including Combwich, Otterhampton, Steart and Stockland Bristol so the impact of this application will also affect the wider community. There appears to be a disconnect between the Cannington Health Surgery who we suggest are at the sharp end with the knowledge, awareness and experience of the community it serves daily, to that of the South Devon NHS Foundation Trust.
- (ii) School and education - Similarly, as evidenced by Estates Planning Advisor at Somerset Council's response dated 31.1.24 to accommodate the proposal, new build will be required for Cannington Pre-school and Cannington CofE Primary School which as of October 2023 is at net capacity and a single classroom for 30 places will be required. It should be noted that the school also serves the wider community. Obviously, a proposal of this size will impact Secondary and further education expansion.
- (iii) Notwithstanding financial investment from the applicant (Policy D27, Education Provision, 7.236) CPC would like to see evidence that these necessary classroom extensions within the curtilage of Cannington CofE School are physically achievable, prior to any approval (or not).
- (iv) The development removes an area of open space. The footpath that crosses the site is a well-used path within open fields and gives easy access to the wider footpath network of the area.

This application does not meet Criteria 6 as without a strategy to improve healthcare provision and school capacity within the area, this application cannot demonstrate compliance with policy.

Criteria 7

Highlights the importance to maintain and enhance the local environ, landscape, historic environment, including where appropriate habitat creation and community woodland planting

- (i) This is particularly important given the community's acknowledgement of this site's importance for landscape visual quality, green infrastructure and biodiversity and in consideration of local plan policies including for example, Policy D29, D30 and D31.
See also 3.1, 3.2, 3.3 above
- (ii) The application completely comprises of Grade 1 and 2 agricultural lands, containing 3 fields of cereal non-crop (Para 1.3 EIA prepared by ETHOS). Given the National Planning Policy Framework (NPPF) 2023 highlights the significance of best and the most versatile agricultural land, it is important to understand if this development will result in the loss of natural capital (para 180 (b) NPPF) and what measures are in place to conserve and enhance this important economic resource.
- (iii) Planning Policy suggests an 'abundance' of farmland, but perhaps it should consider additional, desirable attributes such as topography, that further enhances this grade 1 and 2 land making it more desirable for agricultural use than housing e.g. natural irrigation from being on an incline, considering the vast hectares of low-lying land in Somerset that are subjected to regular flooding.

Criteria 7 is not met

Criteria 8

Provide affordable housing in accordance with the Council's requirements

- (i) CPC notes the Housing Enabler now supports the proposal: "Developments should provide at least 30% affordable housing on site; the application is providing 48 units which is policy compliant. The proposed affordable housing mix on this application is acceptable in terms of mix and tenure for the affordable housing units.
- (ii) 5.166 - District wide requirements are set out in Policy D6: Affordable Housing. Policy D6 sets a target for greenfield sites as 30% affordable housing. The submitted Affordable Housing Statement relies on evidence that is more than 3 years old; the Strategic Housing Market Assessment 2016 and Cannington Local Housing Needs Assessment 2018.

- (iii) It may be indicative to note however, that at that time, a need was identified for 32 dwellings. Subsequently, 22 of these 32 dwellings were delivered by the Grange Meadows development. Of these 22, 8 have been allocated to residents (category 1); 1 house (category 2); 1 house (category 3); 2 houses (category 5) and 4 houses (category 6 via Homefinder's policy). The remaining 6 dwellings are under the Shared Ownership Scheme (category 6 – unallocated Register Provider Units that were allocated in accordance with Home Finder Somerset housing policy and rules). Therefore, the housing need was met and exceeded by the Grange Meadows development, which was completed in 2023, including the 6 unallocated Register Provider Units.
- (iv) In addition, and in terms of housing delivery, Policy S2 states:
 "The Council will manage housing delivery positively and proactively through its housing trajectory, ensuring that a minimum of five years deliverable land supply for housing is maintained. The release of additional unallocated greenfield land for housing (i.e. in addition to sites than can come forward under criteria-based policies T2a, T3a, T4 and D9) will only be approved where through monitoring it is demonstrated that there is a shortfall in the five-year supply of deliverable land supply for housing".
- (v) The last published Sedgemoor Annual Monitoring Report 21/22 highlighted a 6.51 year housing land supply (<https://www.somerset.gov.uk/planning-buildings-and-land/evidence-base-and-monitoring/monitoring/> There is, therefore no justification for a departure from local plan policy or an urgent need to deliver housing numbers well in excess of minimum targets so early in the Plan period.
- (vi) Paragraph 5.165 of the SLP states that "whilst stated as a minimum, any specific proposal or combination of proposals that significantly exceeded this would need to demonstrate there were no significant adverse impacts". From the information submitted within this application it does not demonstrate that there are no adverse impacts likely as a consequence (see other comments throughout this response).

The proposed quantum of development is unjustified, and the scheme is contrary to Local Plan Policy S2 and T2a.

5. POLICY S5 – MITIGATING THE CAUSES AND ADAPTING TO THE EFFECTS OF CLIMATE CHANGE

Releasing Embodied Carbon

- (i) The submitted cross sections show cut and fill. Noting the current climate emergency, extensive engineering to manipulate and contain different levels incur costs in carbon. The proposal's significant ground reforming will release embodied carbon and does not demonstrate a development taking full account of climate change contrary to national planning policy. The submitted Sustainability Statement does not take this into account and fully consider the environmental objectives of the NPPF (para 124 (b)) and Policy S5 of the SLP.

6. POLICY D1 – FLOOD RISK AND SURFACE WATER MANAGEMENT AND SURFACE WATER DRAINAGE

- (i) CPC notes the many recommendations and concerns identified within the Lead Local Flood Authority (Sustainable Drainage Systems) response. For example, the Parrett Drainage Board (14/01/25) maintains an objection, stating that the updated information does not overcome concerns regarding the onward connectivity of the two watercourses. Clearly, these need to be addressed by the applicant before consideration of the application.
- (ii) Given the elevated position of the land, together with the removal of 2-3ha of permeable ground, concerns have been raised about increased flooding in the lower parts of the village; specifically, Withiel Drive and further within the village that are in flood zones 2 and 3. Withiel Drive residents have advised that recent torrential downpours causing excess water runoff from the field, funnels through the shared driveway from the back of the garages to their houses. Gardens have been flooded, and airbricks have been breached on occasion. Chads Hill and Withiel Drive are also likely to be impacted. These roads already experience high volumes of water running down the roads into the High St and overwhelming the manholes during torrential downpours.
- (iii) Appendix 2 provides photographic evidence of flooding in and around the A39 approaches to the Brymore Way west roundabout and Withiel Drive on 4 December 2023. The drainage capacity in these areas must be addressed.

7. POLICY D21 – ECOLOGICAL NETWORKS (see also D23 Bat consultation zones below)

An Ecological Impact Assessment was carried out by ETHOS at various periods between April and November 2023. The summary of important ecological features identified in relation to the development and their importance are summarised below:

IMPORTANT ECOLOGICAL FEATURES	SCALE OF IMPORTANCE
Exmoor & Quantocks Bat Special Area of Conservation	International
Native hedgerows	Local
NERC S.41 Mammals – Brown Hare and hedgehog	Local
Badger (Badgers & their setts are protected by law. Licences from Natural England are required if unable to avoid disturbing them) Govt . Website 12.2.24	Protection of Badgers Act 1992 in England and Wales
Bats – Barbastelle (commuting)	County
Bats – Lesser and greater horseshoe	Local
Bats – Other bat species	Local
Birds – Hedgerows	Local
Reptiles	Local

1. Brown Hare and hedgehog are listed as species of principle importance for the conservation of biodiversity in England.
2. Any animals using the site are likely to form part of a wider population within the local area, which would be of local importance for nature conservation. Indeed,

several mammal holes were found on site in the southwest area of the southeastern field along H9, with a mammal trail found along H6.

3. The surveys recorded five Birds of Conservation Concern (BoCC) Red List species on site, namely song thrush, house sparrow, starling, swift and greenfinch.
4. The hedgerows are assessed to be the key ecological features on site, providing suitable foraging and commuting habitat for a range of species, including bats, hedgehog, brown hare, badger, birds, reptiles, amphibians and invertebrates.
5. There was evidence of slow worms, but the count was too low to be considered in the assessment.
6. Common newts (not part of the survey) are present on land adjacent to the site.
7. Concerns have been expressed that circa 15m of the buffer zone of the commuting habitat for the bats will be removed to form the entrance to the site. Consideration of this aspect must be given in view of the international importance attached to the Exmoor and Quantocks Bat Special Area of Conservation.

It is very clear that the site supports a great deal of species of International, County and Local importance and the loss of habitat will have an adverse effect due to loss of foraging and wildlife corridors.

Whilst mitigation measures can be employed during construction, impacts on individuals could occur during site clearance, comprising injury or mortality of mammal foraging and commuting over site. This would be a great loss. Further details on bat foraging, commuting and lighting were requested by the Council's Ecologist (06/02/24). Lighting details have been submitted. Ecologist yet to provide revised comments (see 3.3)

8. POLICY D22 – TREES AND WOODLAND

Whilst it is noted that Tree Protection Plans have been put in place for some trees (along with an Arboriculture Report) the development will remove significant lengths of hedges and some trees. This is contrary to the Hedgerow Retention Notice made by Sedgemoor District Council for this land in March 1988.

9. POLICY D23 – BAT CONSULTATION ZONES

Thirteen species of bats have been identified using the buffer land along Brymore Way, running south to north as their commuting habitat. See also 7, D21 Ecological Networks above.

10. POLICY D24 – POLLUTION IMPACTS OF DEVELOPMENT

The lighting strategy document prepared by DFL conducted a desktop study against a proposed development site layout plans that is materially different to the proposals submitted under this application and does not accurately reflect the impact the impact of lighting from this application. The most notable differences include:

- Urban development to the southeast of the site (current plans; large open space)

- No dwellings and a large attenuation pond to the southwest of the site (current plans; significant number of dwellings)
- Large open space on the northern ridge (current plans; much smaller open space and many dwellings)

Note this comment was raised at the time of the first application and is still applies. The lighting strategy plan is significantly different to the current site plan. This needs to be re-evaluated.

- Currently, the area of the proposed development offers a dark outlook at night as there are few low output streetlights. The proposed development light spill will significantly and adversely affect the area and due to its elevated position, will be seen for miles around.

11. POLICY D26 – HISTORIC ENVIRONMENT

The Historic Environment Assessment submitted in support of this proposal discusses the results of a geophysical survey that has been carried out on the site. However, no survey has been submitted either to the Somerset HER or as supporting information. The report should be supplied to enable a proper consideration of the results, particularly considering the significant remains excavated in advance of the by-pass at Knapp Farm.

Therefore, at present there is insufficient information to ascertain the significance of any archaeology present on the site." (08/02/24). There is no apparent response to this on the portal and revised details have not been listed in the covering letter dated 20th December 2024.

12. POLICY D31 – COUNTRYSIDE AROUND SETTLEMENTS

This area provides buffer between the bypass (Brymore Way) and existing developments in the village. It also helps to retain a link with the surrounding countryside and also a corridor for wildlife. A public footpath runs from east to west across the site, crossing Brymore Way and continuing to the countryside to the west of the bypass. This proposed development would detract from the entrance to the village. The elevation of the development dominates the landscape and is of too large a scale for the village.

Appendix 1 – Timetable for First Bus public transport for Cannington

BRIDGWATER - CANNINGTON - NETHER STOWEY **14**

via Alfoxton Road, Wembdon

Monday to Friday (except Public Holidays)

Service Number	14	14	14	14	14	14	14	14
Bridgwater Community Hospital	0900	1020	1150	1320	1450	1620
Bath Road	0903	1023	1153	1323	1453	1623
Bridgwater, Bus Station [2] arr.	0907	1027	1157	1327	1457	1627
Bridgwater, Bus Station [2] dep.	0737	0910	1030	1200	1330	1500	1630	1720
Bridgwater, Rear of Angel Place	0740	0913	1033	1203	1333	1503	1633	1723
Alfoxton Road	1042	1212	1342	1512	1642
Wembdon, opp. Post Office	0747	0920	1049	1219	1349	1519	1649	1730
Cannington, opp. Post Office	0753	0926	1054	1224	1354	1524	1654	1736
Cannington, Cemetery	0929	1057	1227	1357	1527	1657
Nether Stowey, Castle Street	1748
Nether Stowey, Pooles Close	0806	1750

NETHER STOWEY – CANNINGTON - BRIDGWATER **14**

via Wembdon, Alfoxton Road

Monday to Friday (except Public Holidays)

Service Number	14	14	14	14	14	14	14	14
Nether Stowey, Pooles Close	0807	1751
Nether Stowey, Castle Street	0809
Cannington, Cemetery	0820	0930	1100	1230	1400	1530	1700	1803
Cannington, Post Office	0821	0931	1101	1231	1401	1531	1701	1804
Wembdon, Bus Shelter	0829	0939	1109	1239	1409	1539	1709	1812
Alfoxton Road	0945	1115	1245	1415	1545
Bridgwater, Mount Street	0836	0954	1124	1254	1424	1554	1716	1819
Bridgwater, Bus Station [2] arr.	0839	0957	1127	1257	1427	1557	1719	1822
Bridgwater, Bus Station [2] dep.	0841	1008	1138	1308	1438	1608
Bath Road	0845	1012	1142	1312	1442	1612
Bridgwater Community Hospital	0848	1015	1145	1315	1445	1615

Appendix 2 – Photos of flooding at Brymore











