

## Response ID ANON-8CC9-KD8W-N

Submitted to **Local Plan Issues and Options**

Submitted on **2020-03-12 16:26:25**

### Your details

**What is your name?**

**Forename:**

Judith

**Surname:**

Gannon

**Are you making an individual response or on behalf of an organisation?**

Organisation

**If individual, please tell us what type:**

**Name of organisation:**

Abbey Manor Group Limited

**Please choose one from the drop-down list:**

Developer

**What is your (personal/organisational) address?**

██████████  
██████████  
██████████  
██████████

██████████  
██████████

**What is your email address?**

██████████  
████████████████████

### 1. Overview and objectives

**Do you agree that these are the right Objectives for the Local Plan?**

Disagree

**Please provide reasons for your answers (200 words max):**

The majority of the new housing which will be constructed in the period between now and 2030 has already obtained Planning Permission and as such it will not be affected by the new Policies of the new Local Plan, it is misleading to suggest otherwise, instead these policies will adversely impact on new smaller developments and affordable housing.

As part of it's Paris Agreement obligations the Government has legislated for what it believes is a realistic and deliverable national objectives that balance the potential conflicts between economic need and responding to the Climate Emergency. These targets will be demanding enough without lower tiers of local government seeking to impose yet more stringent policies as political gestures. To do so would put the deliverability of the other objectives of the plan at risk as well as distorting local economic patterns.

For example, the Government has gone to considerable effort and expense to consult on changes to the Building Regulations that are consistent and economically balanced. We feel that the Local Plan should respect these National Standards wherever they exist and only seek to impose additional (realistic) targets in relation to matters that lie outside National governance and are distinctively Local.

### 2. Carbon neutrality

**Question 1a: Should we aim to require that all newdevelopment is 'zero carbon' by as soon as possible (e.g. by 2025) or give slightly more time (e.g. by 2030) for developers to adapt their design approaches, materials and suppliers?**

Slightly more time (e.g. by 2030)

**Question 1b: Should we allocate sites for specific renewable energy development or identify broad areas which we consider suitable?**

Identify suitable areas through criteria based policies

**Question 1c: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

1b criteria based unless full viability and willingness assessed, less flexible would need a huge buffer. Need to allow for microgeneration in areas of landscape sensitivity

1c National government has committed to net zero emissions by 2050. The target of 2030 would set a much higher standard considerably earlier than the government target and therefore not comply National Policy . this would create a situation where the local plan policy is not the same as other areas across the country. A situation which the government is seeking to avoid by bringing forward legislation to prevent LPA's adopting more stringent standards than National Building Regulations. This proposed policy also flies in the face of NPPG on technical standards and has not been tested to ensure that development will remain viable

1c/1 This proposed policy would be in conflict with National Policy on technical standards and Building Regulations which the Government is seeking to prevent

1c/2 The provision of an EV charging point for every residential parking space would be costly and unnecessary, provision of ducting to allow future connection is reasonable and in accordance with the Government's consultation on electric vehicle charging .

1c/3 This is supported by the Future homes standard consultation which will come into force in April 2020

1c/4 Whilst it is laudable to support such projects, they are bound to come into conflict with policies protecting sensitive landscapes, habitats and historic buildings of which there are many in this council's area, unless specific policies are put in place which exempt such projects from the usual protections which apply.

1c/5 This policy must comply with the national environmental protection Act when it becomes law so that the technical standards required do not exceed the nationally prescribed standards

1c/6 This Policy will be necessary if the Environmental Protection Bill becomes law to enable the proposals for Biodiversity improvements to take place, however without further national guidance I can see difficulties in the detail of such policies

1c/7 This policy is unnecessary as it already exists within Highway technical standards and Building Regulations

### **3. Sustainable locations**

**Question 2a: Do you agree with the tiers that identifies Taunton followed by 6 tiers covering the other settlements?**

No

**If not, what changes would you make and why? (200 words max):**

The principle of having tiers is acceptable however there are errors within the hierarchy of settlements. Henlade and Ruishton for instance have to be considered as part of Taunton given the substantial quantum of development already permitted and allocated within these areas such as Nexus 25.

**Question 2b: Do you think Watchet and Williton should be seen as associated settlements for the purposes of the Local Plan due to their close proximity and in complementing the services of each other (and therefore be in a higher tier to Bishops Lydeard and Wiveliscombe)?**

Yes - Watchet and Williton should be seen as associated settlements

**Please provide reasons for your answers (200 words max):**

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

Leave housing distribution the same

**Please provide reasons for your answers (200 words max):**

**What else do you think about housing distribution in our area?**

**Please provide comments (250 words max):**

**Question 2d: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

2b/1 This policy will need to have exceptions otherwise it could fundamentally conflict with the settlement strategy. The emphasis of the policy should be to identify what can be viably achieved within the settlement strategy and not be capable of being used to over-ride other policies

2b/4 Support for small sites and individual plots in other settlements and communities to maintain the sustainability of the rural areas

### **4. New and affordable homes**

**Question 3a: Should our housing requirement figure match the Government's minimum figure of 702 dwellings per year or should we have a higher figure?**

The housing requirement should be higher than 702 dwellings per year and determined by economic growth strategies, infrastructure improvements and unmet need from neighbouring planning authorities

**Please provide reasons for your answers (200 words max):**

Target the higher figure as this will encourage the economic growth of the area, constraining delivery often increases values making housing more unaffordable

**Question 3b: How should we proactively plan for Gypsy, Traveller and Travelling Showpeople pitches?**

Allocate sites specifically for pitches.

**Please provide reasons for your answers (200 words max):**

iii) Allocating sites specifically has worked in other areas where this has been coupled with funding for those pitches collected via CIL. Option ii) has been shown to not work in other areas and is not supported by the council of mortgage lenders resulting in much need open market and affordable housing not be provided

**Question 3c: Should we require that all new housing developments include a percentage of new homes that are designed to be accessible, adaptable and wheelchair accessible?**

Do not require specific measures for adaptable, accessible and wheelchair homes.

**Please provide reasons for your answers (200 words max):**

Designing homes for life also requires a greater ground floor footprint than the standard housing type which in turn means that densities will be lower. Whilst we would support a percentage requirement from all sites these needs to be carefully considered against policies which require high densities

**Question 3d: How should we provide for custom self-build plots? Should we:**

Include a positive encouragement policy, including for community-led projects, and leave the housing market to deliver plots as and when demand arises; and/or

**Please provide reasons for your answers (200 words max):**

Suspect that ii) and iv) would achieve the same result, iv) would seem to be the way that is achieving delivery in neighbouring authorities.

iii) has been tried in neighbouring authority and failed due to the type of plot being provided. If ii) or iii) is adopted you need to take into account that the majority of self builders are individuals and plots need to allow for detached homes

**Question 3e: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

3e/3 This proposal would be prejudicial to the delivery of affordable housing in rural areas and the above mentioned self build plots

3e/4 This proposal would be prejudicial to the delivery of affordable housing in rural areas and the above mentioned self build plots

3e/6 Whilst a national policy which we would normally support. Evidence from neighbouring authorities has shown that smaller dwellings are popular with first time buyers as they are more affordable . in contrast in rural areas and in support of rural workers, secure dry space attached to the dwelling is a necessity

3e/7 Support in principle subject to the detail

## **5. A prosperous economy**

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

Align with the Heart of the South West growth ambitions (deliver a shift towards a significant increase in overall job numbers including higher value jobs)

**Please provide reasons for your answers (200 words max):**

The current policy which target high quality jobs has not worked, 4a ii) should be pursued if we are to arrest the drain of younger people from the area

**Question 4b: Should we keep all of our existing employment sites and allocations in employment use or should we allow the loss of some to other uses? How should we decide which ones to lose?**

Develop flexible policy allowing for the loss of any existing/ proposed employment site subject to specific criteria

**Please provide reasons for your answers (200 words max):**

Some employment sites should be lost to other uses via a flexible policy iv). Any other is likely to result in the loss of more economic industrial space which suits smaller manufacturing businesses particularly start ups

**Question 4c: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

4c/2 Some science needs to be applied here, eg reuse of old obsolete and inefficient equipment is not always the most environmentally or economically sensible approach

4c/4 The provision of community work hubs has proven successful in neighbouring areas, the requirement for home offices has not with many prefer to use a spare bedroom or share their living space.

4c/6 This policy has been in place for a number of years and has not prevented the decline in our town centre. With the growth of online shopping and deliveries it is more sustainable to ensure that top up shopping opportunities and local facilities are available near to where people live rather than having to travel

4c/7 Support

4c/8 This proposal would stifle innovation and be contrary to 4c/7

4c/9 This should not be overly restrictive

## **6. Infrastructure**

**Question 5a: On what infrastructure should we prioritise developer contributions? (Please rank in order of priority)**

**IO - 5a - ranking - Affordable housing:**

2

**IO - 5a - ranking - Designing for the Climate Change Emergency:**

4

**IO - 5a - ranking - Accessible, Adaptable and Wheelchair Accessible homes:**

3

**IO - 5a - ranking - Strategic Infrastructure (schools, transport, community facilities):**

1

**Question 5b: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

Strategic infrastructure should not include GP or hospital facilities as these are already funded via national taxation and GP contracts

5b/3 With the greater reliance on electricity to provide all of our power requirements, there will need to be policy consideration of new generation equipment other than wind and solar

5b/4 Unnecessary as already required by the EA, LLFA, National Policy and Building Regulations

## **7. Connecting people**

**Question 6a: How can we encourage people not to use their car when travelling into our towns for shopping and work? How can we provide more opportunities for using public transport in rural areas?**

**Please provide comments (200 words max):**

By encouraging financial support and or physical infrastructure/links to public transport nodes (bus stops etc)

The likelihood of increasing bus services in rural areas is slim. By adopting a parking charging policy in the more rural and coastal strip towns which encourages people to make at least part of their trips to work/ shop in Taunton and Wellington by public transport. This would create an informal park and ride and help to increase the survival of the inter town bus services.

by increasing the hours at either end of the day for the services to and from rural areas so that more services are likely to fit with normal working hours.

**Question 6b: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

6b/2 This policy requirement will need to be included in any viability assessment and may be more suitable for delivery via CIL

6b/4 Developers and Housebuilders are not internet service providers, they will not be able to provide full fibre digital connections where the local ISP network does not provide it. The best developers can provide is the ducting to enable full fibre connectivity in the future.

## **8. The natural and historic environment**

**Question 7a: Are there any specific measures that you would like to see new developments deliver to improve biodiversity locally?**

**Please provide comments (200 words max):**

Suitable alternative Biodiversity offsetting provided within areas well connected to other areas of strong biodiversity by working with the neighbouring authorities such as the National Park and the North Devon Biosphere will be of wider benefit than small unconnected pockets within individual developments and allow higher densities to be provided on suitable sites.

**Question 7b: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

7b/1 BNG should follow the procedure set out in the Environmental Protection Bill when this becomes law which will be in advance of the LP being adopted

7b/3 This policy is likely to conflict with the provision of housing and employment

7b/5 Local Green spaces need to have a benefit to the public, be that landscape or public access and follow the NPPF guidelines on this issue

7b/6 This is a subjective issue and needs to take into account the changing character of an area, particularly in areas of brownfield regeneration

7b/9 A general protect policy will create conflict with development of housing and employment

7b/12 Tree planting is not necessarily the best way to improve biodiversity, the LPA should identify existing sites which can be improved and use funding from BNG offset payments from development as proposed in the Environmental protection bill

## **9. Thriving coastal and rural communities**

**Question 8a: How should we manage development in rural areas? Should we:**

Not have settlement boundaries but instead have a criteria based policy to determine development proposals against; or

**Question 8b: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

8a Settlement boundaries automatically create areas of higher value and therefore increase the lack of affordability. A criteria based policy would be more effective and deliver more affordable homes in our rural areas

8b/1 Support

8b/2 Is a restrictive policy which conflicts with 8b/3

## **10. Wellbeing of our residents**

### **Question 9a: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

9a/1 Developers can create active spaces but cannot force people to use them

9a/3 Any flexibility in highway design will need to comply with the technical standards for adoption

9a/5 are all matters which are dealt with Statutory consultees and other public bodies. to add them to planning creates unnecessary duplication of effect and bureaucracy

9a/6 the former Taunton Deane Council area had a public art policy for a number of years, before adopting a new one it would be worth research the effectiveness of the previous policy and whether it was of benefit or an added cost and resource.

9a/7 this policy would undoubtedly adversely impact on the proposals to increase density in Taunton

## **11. Policies for our places: Taunton**

### **Question 10a: How do you think we could introduce more housing into Taunton Town centre?**

Positively encouraging taller buildings (subject to impact upon the skyline); or

**Please provide reasons for your answers (200 words max):**

### **Question 10b: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

10b/1 Support

10b/2 Support

10b/3 Support

10b/4 In attracting more users to sustainable transport it is important not to impede the flow of vehicular traffic on the main through routes to West Somerset which will otherwise suffer further from isolation

10b/5 The use of private vehicles for people to reach the town centre is highly likely to remain important even though the fuel may change, places which do not have accessible and available parking have found that people turn away from them. So rather than improving the town centre a policy of consolidation is likely to result in less footfall in the town centre

10b/10 Local green space designations must comply with the NPPF criteria for allocation

## **12. Policies for our places: Wellington**

### **Question 11a: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

## **13. Policies for our places: the Coastal Strip**

### **Question 12a: Do you have any comments on these policy approaches?**

**Please provide comments (250 words max):**

12a/1 support

12a/2 the is policy should be strongly supported, unfortunately the parking charging policies of SW&T do not support this policy, by imposing higher charges in the former West Somerset District area than the former Taunton Deane Borough Council area and having different charging regimes such as no Sunday charging in Taunton whereas charges are made in the former West Somerset District area which does not encourage local residents or visitors to make holiday or leisure trips into the local towns.