

Response ID ANON-8CC9-KD5Z-N

Submitted to **Local Plan Issues and Options**

Submitted on **2020-03-16 14:01:36**

Your details

What is your name?

Forename:

Pete

Surname:

Stockall

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

Organisation

If individual, please tell us what type:

Resident of elsewhere

Name of organisation:

Avison Young

Please choose one from the drop-down list:

Planning Consultant

What is your (personal/organisational) address?

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

What is your email address?

[REDACTED]
[REDACTED]

3. Sustainable locations

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

Not Answered

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

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)?

Not Answered

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?

Not Answered

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):

We support the focus on making the most effective and efficient use of land, giving preference to the recycling of previously developed land where this aligns with the settlement strategy and other policies. This accords with the broad thrust of National Planning Policy Framework (NPPF) advice. However we wish to see further recognition within these policy approaches to the additional NPPF requirement to consider changes in the demand for land and consider reallocation for more deliverable use (NPPF para 120). We further expand on this issue below within question 4b.

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):

Rather than relying on the Standard Method with regards to housing requirement, we support Option ii in relation to the above 'issue' which states:

"To use a higher housing requirement figure with the precise figure to be determined following further work. To be informed by:

- o Economic growth strategies;
- o The need to support strategic infrastructure improvements;
- o The need to accommodate any unmet need from neighbouring planning authorities;
- o Existing delivery rates (existing Local Plan requirement is a minimum of 19,900 dwellings over 20 years 2020-40 or 995 dwellings per year)"

While we note that Somerset West and Taunton Council have significant commitments (6,177 dwellings) and further sites identified as deliverable (7,911 dwellings) and healthy housing land supply in this respect, totalling at 14,088 dwellings, exceeding the minimum requirement for 14,040 dwellings, there should be an acknowledgement that not all of this land will necessarily come forward for development within the plan period. In particular, while larger allocated housing sites make significant contributions to meeting council's targets, they are prone to delays in delivery.

We would also draw your attention to the recently published 'Housing Delivery Test' results for the 2016-2019 period published by the Ministry of Housing, Communities and Local Government (MHCLG). Under the test, authorities delivering under 95 per cent of their housing requirement have to produce an action plan outlining the causes of their under-delivery. Those scoring under 85 per cent also need to add a 20 per cent buffer to their required five-year housing land supply, instead of the usual five per cent buffer.

It has been calculated by Planning that 20 local authorities have an increasing housing land supply target as a result of this process, moving from a 5% buffer to 20% and of these, West Somerset was cited as one of the three likely to lose their five-year housing land supply as a result. West Somerset's delivery test score is cited as 83%, down 47% from 2018's score and with a land supply position with a 20% buffer of 4.9. For more information please refer to the following link: <https://www.planningresource.co.uk/article/1675408/councils-set-lose-five-year-housing-land-supply-due-delivery-test>.

It is noted however that these figures do not take into account the new Council's combined figures, with Taunton Deane traditionally having a healthy land supply (quoted as 6.87 in the March 2019 SHLAA). However, this process does highlight the unpredictable nature of housing delivery and as such Council's should be looking to reinforce their housing land supply even if it exceeds five years, otherwise they may fall foul to the housing delivery test with an increased buffer and supply requirement, making them prone to challenge via appeals.

In addition, there is a need for Council's to ensure that they include a wide range of types and sizes of sites in their land supply. Somerset West and Taunton Council's need for affordable housing is reinforced within the Issues and Options document itself, where it is outlined as a key priority for the Council. A higher housing requirement figure would, if supported by sufficient policy guidance, could be used to address the range of housing sites available within the area.

We understand the representations prepared by the Homes Builders Federation will pick up on the above issues in more detail and we will therefore endorse their analysis and representations.

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

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

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?

Not Answered

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

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

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

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

Please provide comments (250 words max):

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?

Not Answered

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

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?

Allow the loss of specific sites for alternative uses – with a low flexibility buffer (i.e. more sites lost); or

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

We support elements or a combination of each points set out within ii-iv of Option 4b, in providing a greater degree of flexibility and pragmatism in consideration to employment sites. These 'options' respond positively to Paragraph 120 of the NPPF which states:

"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

- a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area."

Page 28 of the 'Issues and Options' document, recognises that Somerset West and Taunton Council has too much new land allocated for employment compared to demand and as such allocated sites require a review. We note that the proposed site review will include an Economic Development (Prosperity) Strategy, we would expect this review to include specialist commercial advice to ensure that the exercise is reflective of market conditions. St Modwen would be very happy to provide any further market information in relation to the E1 site to justify its reallocation for residential development.

A footnote within the 'Issues and Options' document confirms that the oversupply of employment land was confirmed through Section 5.5 of the 'Employment, Retail and Leisure Study' produced by Peter Brett Associates along with the former West Somerset and Taunton Deane Councils. This is the principal evidence base for employment need within the emerging Local Plan. The JLL Employment Review document attached at Appendix 2 reflects in more detail to this evidence base as detailed below. However, the key conclusions and recommendations of PBA include those as follows:

- Quantitatively, there is too much allocated employment land
- To reduce the quantum through the Local Plan review process
- To potentially reduce the quantum by half
- To remove those sites which are undeliverable
- Retained sites should be a minimum of 3ha to provide a critical mass for development purposes

On this basis, it is anticipated that through the Local Plan Review process, a significant number of sites should be deallocated, with the principal consideration being the marketability of each site.

In this case, SMDL has been marketing the site for an employment use for in excess of five years. This marketing campaign has been active, comprehensive and sustained, involving well established local agents, Humberts and Alder King. Despite this considerable marketing window, no formal offers have been received and interest has been limited. An independent review undertaken by JLL of the marketing process consideration as to why the site has not been developed for employment uses is attached at appendix 2. It is considered that this is due to the following principal reasons:

- The site's relative inaccessibility to the motorway and strategic road network compared to competing sites
- The site lacks prominence, a particular requirement for local trade occupiers.
- The site is close to residential development which is perceived as a constraint by modern operators

As such, it should be concluded that this site is not attractive to the market and has no realistic prospect of coming forward for development. Given the overall context of a significant imbalance of supply over demand, we conclude and recommend that the subject site is de-allocated and considered positively for alternative uses, in line with NPPF guidance.

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

Please provide comments (250 words max):