

Response ID ANON-8CC9-KDS8-H

Submitted to **Local Plan Issues and Options**

Submitted on **2020-03-12 13:14:04**

Your details

What is your name?

Forename:

Louise

Surname:

Davidson

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

Organisation

If individual, please tell us what type:

Name of organisation:

Magna Housing

Please choose one from the drop-down list:

Registered Social Housing Provider

What is your (personal/organisational) address?

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

What is your email address?

[REDACTED]
[REDACTED]

1. Overview and objectives

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

Agree

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

This is a clear and best practice approach to developing a Local Plan that reflect the current environmental, housing and economic challenges facing most Local Authority areas across the country.

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?

As soon as possible (e.g. by 2025)

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

A combination of both of the above

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

Please provide comments (250 words max):

The construction industry has a long way to keep up with zero carbon ambitions. Policies should favour the use of MMC and a fabric first approach to developing homes, recognising that they may come with design limitations and flexibilities compared with traditional built developments. Policies need to be clear if they are

seeking zero carbon 'in use' and / or zero carbon in development. These are two very different things. One very progressive approach would be to have a % policy requirement on zero carbon MMC delivery on all larger sites or to consider CIL reduction / exemption on homes meeting zero carbon before 2030.

3. Sustainable locations

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

Yes

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)?

Yes - Watchet and Williton should be seen as associated settlements

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

It makes sense to consider the 2 settlements as one location for local planning purposes. They have complementary services and the best land for development sits neatly between the two locations.

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):

Whilst strategic delivery is key for housing growth and the economic sustainability of a region, there is a need for limited growth in the rural and market towns . This rural growth should be controlled to ensure all sites deliver a policy level of affordable housing (ie 10 homes or above) to meet local need.

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

Please provide comments (250 words max):

n/a

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

Please provide comments (250 words max):

n/a

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):

Aiming for a higher housing number provides certainty of delivery in a very uncertain development / construction market. The issue arising from Duty to Co-operate with neighbouring LAs is an important one to reflect and recognise.

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

Apply rural exceptions criteria for small scale residential sites where pitches which would be affordable in perpetuity; and/or, Allocate sites specifically for pitches.

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

Sensitivity needs to be shown when determining the best fit for traveller pitches, acknowledging different lifestyle choices, design requirements and the compatibility with more mainstream development. The answer to this question really needs to come from within the Gypsy and Traveller community. Are these requirements for permanent or transit pitches - the different needs of the two should be recognised.

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?

Require a proportion of dwellings to meet the category standard as set out in Building Regulations Part M.

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

Subject to evidence, all development should make provision for accessible homes to Part M4(2). All homes designated for older people should be built to this standard as a minimum with an appropriate proportion (evidenced) of M4(3)b homes. There is little point delivering open market homes at M4(3) levels as there is no ability to tie occupation into market units without being accused of fettering values. Affordable homes at higher accessibility standards should be secured in

accordance with evidence.

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, Include a requirement for all housing development sites over a threshold to include a proportion of plots as self-build plots; and/or

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

Please do not conflate self-build with affordable housing provision (final option) They are not the same thing, although a community-led self-build initiative may include, or be predicated on an affordable housing delivery. Any exception site should already be able to deliver SB plots if secured correctly but specifying this would loose the impact and uniqueness of the ability for affordable hosing providers to meet the housing needs of a rural community. I would argue that delivery of traditional affordable housing is a higher priority for exception site delivery.

The most cost effective and streamlined way of delivering on self-build agendas is to secure as a proportion of serviced plots on large, strategic sites, allowing for clear cascades for delivery so as not to fetter a developers ability to complete a development and move off site.

Positive encouragement for single plot delivery of exemplar self build homes and community-led delivery send s a clear message that SWT planners are open for discussions about innovative, self build approaches. The role of MMC / modular housing options should be promoted in this regard, along with wider sustainability measures.

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

Please provide comments (250 words max):

For certainty of a successful application of an affordable housing policy it is advised that the detail is not restricted to SPD but incorporated into Core policy - this includes tenure, access ble and space standards and any other delivery issues that are key to securing the right homes, in the right places for the right people. a rigorous approach to viability testing should also form part of a core policy along with considering explicitly stating that, were scheme viability cannot support subsidy free AH, there is an expectation of delivery using subsidy where available and / or a review of viability at key stages during development.

Key worker housing (now Essential Local Worker housing ref NPPF2019) technically does not have a requirement for lower income levels assigned. Recommend determining which key worker sector is a priority and how the standard AH tests apply.

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):

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

Please provide comments (250 words max):

9. Thriving coastal and rural communities

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

Have a policy which is a hybrid of (i) and (ii) where there are settlement boundaries only in areas of greater development pressure i.e. parts of the District that are more accessible - closer to the M5, Taunton and Wellington areas.

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

Please provide comments (250 words max):

Exception site delivery is difficult to secure if no settlement boundary. Policy needs to allow for development to meet demonstrable affordable housing need even where no settlement boundary is present.

Exception site delivery generally should be a needs-led policy not dictated to by more urban-focused assessments of 'sustainability'.

11. Policies for our places: Taunton

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

Requiring a housing mix skewed towards dwellings with fewer bedrooms; or

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

There should be an option for supporting all 3 suggestions. They are mutually compat ble and make for thriving urban environments.

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

Please provide comments (250 words max):

Key regeneration sites - master-planning effectively to maximise value and looking to utilise government funding to secure delivery. Ensuring affordable housing on these sites is essential but evidence across the country has shown that this is the first thing to go when mixed use regeneration is proposed.

12. Policies for our places: Wellington

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

Please provide comments (250 words max):

Why is securing an appropriate level of affordable housing not a key policy objective for the specific locations? Needs to be re-iterated.

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):