

Response ID ANON-8CC9-KDD7-1

Submitted to **Local Plan Issues and Options**

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Your details

What is your name?

Forename:

Joshua

Surname:

Stevenson

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

Organisation

If individual, please tell us what type:

Name of organisation:

Persimmon Homes South West LTD

Please choose one from the drop-down list:

Developer

What is your (personal/organisational) address?

[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?

Disagree

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

In principle Persimmon Homes south west LTD (Hereby known as PHSW) do not object to the idea of the LPA having a number of objectives but we have concerns regarding:

Objective 1 and its relationship to the UK government objective to net neutrality by 2050. Objective 5, a definition of "essential" is needed, what do the LPA count as essential, the LPA also needs to look at how this may impact viability and cashflow.

Objective 6, Plannings aim is to promote and to enable not to change, without incentives the word "achieve" may be over optimistic considering the current up take of public transport and cycling.

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?

Not Answered

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

Please provide comments (250 words max):

PHSW have grave concerns regarding this policy:

1. This policy is far in advance of the Governments own targets for net neutrality which require the UK to bring all greenhouse gas emissions to net zero by 2050. 2030 never mind 2025 is well in advance of current governments legally binding target of net zero by 2050, hence at current this policy is not consistent with current national policy and not justified, due to the lack of evidence
2. An extension of time to 2030 would not give developers enough time to adapt our product, it is not simply changing materials and suppliers it is a fundamental redesign of the whole house building process, which will undoubtedly increase prices to the end consumer, as we cannot absorb the full cost of these changes whilst also having to absorb the cost of government initiatives such as the first homes scheme.
3. PHSW have extensive knowledge of decentralised energy centres as we have two site in Exeter which use CHP station, there are undoubtedly a number of issues with them and until technology and resources have moved forwards we do not support their use in Somerset west and Taunton due to past technological and supply issues.
4. the future homes standards is referenced in page 14 incorrectly, it presumes FHS will be introduced by 2025, this is incorrect FHS will be introduced in 2025 this is outlined in para 2.19 of the FHS consultation document. The FHS also states that "homes built to the Future Homes Standard will become net zero carbon over time with no need for further adaptations or changes, as they will not be reliant on fossil fuels for their heating." this implies that the homes will become net zero carbon over time and not when they are first constructed whereas the issues and option paper states that all "all new development to be zero carbon" not net zero not carbon neutral, Zero carbon. Hence we believe that SWAT need to look deeper into the definitions of these terms.
5. as is stated in the final paragraph, viability is at the core of this, and it has to stack up financially, but any increases in S106 or build cost as outlined will be reflected in a reduction in affordable housing provision or in the increase in PD house prices.

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):

we agree in principle with the tier based system, especially with Taunton at the top.

However we do not agree with the positioning of some of the settlements within the hierarchy, we note these are circa to change as the local plan progresses, but we are mainly focused on the position of Ruishton, as a village in a strategic location in close proximity to Blackbrook business park, Hankridge farm and with good access to both local and national bus services via the falcon and National express jct 25 bus stops. We believe Ruishton could take additional housing in lieu of development in less sustainable locations which are further from job and retail nodes.

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?

Leave housing distribution the same

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

PHSW in principle agree with the above, but villages and minor rural settlement in close relationship with Taunton should be incorporated into the primary mix, villages such as Ruishton and Shoreditch should see greater focus for future development due to landscape constraints to the North, south and west of Taunton.

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):

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):

Our response on this matter is two fold:

1. we would want to see the full calculation by SWAT in determining a minimum figure of 702, this should include the affordability adjustment factor, baseline and justification of all these figures, we cannot tell if these figures are correct unless we seeing the calculation and assumptions behind it.
2. The guidance document for the governments minimum figure states that it "provides a minimum starting point" with this in mind PHSW believe the wider future economic growth of SWAT and the wider Heart of the south west should be taken into account when calculating the housing requirement figures for SWAT

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):

PHSW have a lot of experience with Gypsy and Traveler sites in Devon, there are a number of issues with planning for the Gypsy and Traveller community. Mid Devons local plans inspector post hearing advice note regarding G&Ts as a proportion of a development site stated "that this course of action might well lead to problems of delivery of either or both" referring to housing and G&T sites. Based on this and the evidence that was provided to the Mid Devon Local plan we would not accept the middle option as a policy therefore option 1 and 3 are preferred subject to publication of future policy wording and the details contained within.

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):

Further work and clarification on the part of the council would need to be done as well as seeing a specific percentage before we can comment fully. But any proportion would need to be assessed in terms of its affect on viability.

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

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

1. PHSW have a number of sites in the south west which require self build plots, our concern is that these plots never relate to where people want to build, instead they are forced to build in large housing developments in keeping with our design code, which in our opinion is contrary to the whole point of self build, where people should be designing their own homes where they want and not where they are forced too.
- 2.

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

Please provide comments (250 words max):

6. Infrastructure

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

IO - 5a - ranking - Affordable housing:

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

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

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

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

Please provide comments (250 words max):

Please see our formal written reps

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):

Please see our formal written reps

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

Please provide comments (250 words max):

Please see our formal written reps

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):

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

Please provide comments (250 words max):

Any provision of Biodiversity improvements should be in line with current government legislation, if anything more than current legislation is proposed this may affect the soundness of the plan.

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):

Persimmon feel the idea of having boundaries in areas of greatest Pressure/Demand is somewhat contrary to the reasoning of not having boundaries in the first instance.

Not having boundaries would mean that land that could be developable but is currently outside the settlement boundary could be brought forward, this would mean villages could get the affordable housing they desperately need and provide more residents to sustain local shops and amenities. We believe that smaller settlements around Taunton and Wellington should not have settlement boundaries and that development should be able to come forward in these villages that need homes but will not have development outside the settlement boundary, this needs to be addressed by the local plan to unlock these areas.