

Response ID ANON-8CC9-KD1U-C

Submitted to **Local Plan Issues and Options**

Submitted on **2020-03-16 09:21:27**

Your details

What is your name?

Forename:

Philip

Surname:

Bisatt

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

Individual

If individual, please tell us what type:

Resident of Somerset West and Taunton

Name of organisation:

Please choose one from the drop-down list:

What is your (personal/organisational) address?

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What is your email address?

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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):

1. Given the concern about climate change, it would seem odd if a new Local Plan was not based around this overarching objective.

2. As by far the largest settlement in the Council's area, making Taunton what might be called a 'destination town' within the sub-region is a sensible aim, so long as this is based around sustainable modes of travel and activity. There has to be a renewed commitment to a 'town centre first' approach, as appeared to be the case a decade ago under Project Taunton, while making sure that the town's wider setting - historically very good - is not spoilt by new development on its fringes. Taunton can make a valid claim to be the one place in the 80 miles between Bristol and Exeter with potential to fulfil such a wider sub-regional role.

6. This is crucial. It's been said before, but transport measures need to be part of a 'place-based' approach flowing from the Local Plan policies, and not be merely a response to demands for less congested roads and more parking space.

9. The UK is arguably becoming one of the more lonely countries in the world. Loneliness is acknowledged as a serious health risk. Simplistic as it may sound, good planning has a key role in making places in which people are less lonely.

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?

Identify suitable areas through criteria based policies

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

Please provide comments (250 words max):

It should be recognised that certain built forms are inherently more energy-efficient than others. In an urban context these are the higher-density forms (flats, terraced houses) that have fewer external elements.

By encouraging compact urban forms, higher-density development also tends to be more suited to walking, cycling and public transport use, thereby helping to reduce carbon emissions from the transport sector (which are about 15-20% of the total).

In the 1990s one leading UK academic stated that the most important single thing that the planning system could do was to '...limit the outward spread of urban areas'. Unfortunately, this issue has not been taken seriously enough. Volume housing has continued to be built at around 35 dph, well below the density of (say) Victorian terraced housing, let alone apartment-based schemes.

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):

I broadly agree with Tiers 1-4. However, I can't honestly see what differentiates many of the 'Minor Rural Centres' from 'Villages' in terms of their sustainability. My parents had to move from one of the MRCs once they became unable to drive, which doesn't suggest a sustainable location for new development.

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?

Increase housing in Taunton; and reduce in Minor Rural Settlements

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

There has often been a tendency to allocate housing in proportion to the existing size of settlements. However, in terms of 'sustainability', it is probably more important to consider the absolute, rather than relative, sizes. It has been argued that 'self-containment' is seldom possible in settlements of less than 25,000 population. Even Wellington and Minehead are reliant on Taunton for certain medical, educational and retail needs. The amount of car traffic now on the A38 between Wellington and Taunton should call into question the wisdom of previously allocating 2000 dwellings and other land in the former town.

Aside from sustainability, the amount of housing that has been allowed in smaller towns and villages (especially when in estate form) has resulted in gradual 'suburbanisation' of some of the more rural parts of the Council's area. This is unfortunate, given that the setting of towns and villages in their surrounding countryside is one of the key factors that makes this part of the South West significantly more attractive than average. Once this character is gone, it cannot be replaced.

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

Please provide comments (250 words max):

(i) The allocation of 2,000 dwellings in the rural part of the former Taunton Deane area was arguably 'over the top' - so my answer would be 'no'.

(ii) Yes, although there is still an issue of how to adequately control the outward spread of the town.

(iii) Almost any conceivable highway network would be inadequate if development takes place on the presumption that the dominant mode of travel will be by private car. What matters more is the precise location of the development, and the effect that this will have on travel by car compared to other modes.

(iv) The re-opening of the station at Wellington is a very worthwhile objective, but by itself would almost certainly not make the town that much more sustainable as to warrant additional housing.

(v) The differing sizes and ability to provide services of these three settlements would appear more relevant. It might actually be worse overall if more housing were to be allowed in the settlements closer to Taunton and Bridgwater, which then led to more commuting by car to these larger towns.

(vi) Whilst care is needed to avoid encouraging long-distance commuting on the motorway, in practice it is only Taunton that can offer enough services to achieve genuine self-containment, and inevitably this means that it should remain the main focus of development.

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

Please provide comments (250 words max):

These objectives all seem reasonable.

Specifically:

2b/2 It was noted at the time of the 'Taunton Vision' in the early 2000s that there was a large amount of under-used land in and around the centre of Taunton. Some of this has since been developed, but much has not and much of that belongs to the Council. Some local authorities are actively developing new social housing on their brownfield sites. Taunton has not built a new multi-storey car park since the 1980s: large areas in Tangier, for example, remain occupied by single-level parking when they could surely be used more efficiently.

2b/3 Agreed, but surely significant development should not be being allowed anyway if a site is not close to a town centre or on a public transport route?

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 the Government's minimum figure of 702 dwellings per year

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

The UK planning system (described by one critic as 'the weakest in Western Europe') has consistently failed to achieve an acceptable quality of new development on greenfield sites. There are some better schemes, but the very fact that many of these are known to the public by name, serves to underline the general point.

Sadly, in the absence of legislative change, the only way to reduce the harm caused to the environment by the national housebuilders is to allocate fewer greenfield sites for them to develop. The UK's 'development management' model of planning appears better able to negotiate acceptable outcomes on small infill and brownfield sites, particularly where there is an established built character to which a developer can then respond.

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?

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):

This already appears to be the policy applied by some other local authorities.

Given that we have an ageing population whose needs can only increase, it would seem essential to do this.

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):

3e/4 In some other countries, sites are not simply allocated for 'housing', but for specific types of housing, based on an assessment of need and the character of the local area. If the Council were to produce design briefs for allocated sites, this would seem to have potential to assist in meeting local housing needs as well as raising the design quality of development.

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?

Not Answered

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

There should be an emphasis on retaining brownfield employment sites rather than allowing jobs to migrate to greenfield sites on the edge of the urban areas, which can frequently only be accessed by car. This applies particularly to offices and other high-density employment uses, as well as small business units which often need lower rent, older accommodation.

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

Please provide comments (250 words max):

Retention of office uses in town centres, rather than allowing new offices to be built on business parks, seems essential, both in terms of sustainable access and also to support the economy of town centres given the challenges faced by the retail sector.

The case for a large employment site at Junction 25 and further development near Junction 26 needs to be re-assessed, as these are not sustainable locations. They are certainly not appropriate for offices and similar high-density employment uses. Such uses should primarily be located in Taunton town centre and specifically at Firepool, near the railway station, as was proposed in the Taunton Vision/Project Taunton.

It would be more appropriate to locate larger floorspace units on the A38 corridor between the major towns of Taunton and Bridgwater, where more public transport is available, than on the A358 corridor near Junction 25, which for most purposes can only be accessed by private car.

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:

1

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

3

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

4

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

Please provide comments (250 words max):

All the options in 5a are worthy, but it somehow seems more appropriate to prioritise funding for the quality and 'liveability' of the development itself, rather than other facilities, however deserving. For example, developers should not really be being asked to pay individually for the whole or a major part of off-site highway works or schools, when their own development is only responsible for a more limited proportion of the extra demand that is arising.

5b/2 would seem essential to avoid unreasonable demands being made of individual developers by some service providers.

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):

Firstly, development needs to be located where use of public transport is a realistic option. In practice this means locating most development in towns with 25,000 or more population (i.e. in this area, Taunton), and using recognised accessibility criteria.

Sites such as Nexus 25 or Chelston are not accessible from most directions, other than by car, whereas Taunton town centre broadly is. High-density employment uses such as offices, retailing and commercial leisure should not be allowed away from town centres.

The 'Taunton Vision' emphasis on focussing trip-end uses (employment, education, leisure etc.) at Firepool should be retained, so that as many people as possible from outside the town can get to Taunton by train. Nationally the average length of bus journey is only 5 miles.

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

Please provide comments (250 words max):

6b/2 Historically a lot of developer contributions towards transport have been spent on major off-site road works, resulting in a legacy of ugly roundabouts, etc. that fail to comply with the advice contained (for example) in 'Manual for Streets'.

The Council needs to use its own land and assets to help meet the objectives. For example, large areas around Taunton town centre are still being used for parking cars at ground level, despite the creation of over 1000 park and ride spaces that were intended in part to allow town centre car parks to be redeveloped. The Council also owns dozens of bus shelters in the former Taunton Deane authority area that urgently need improving or replacing.

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):

There has been a longstanding failure to provide street trees along major new roads and more generally in new housing developments. This seems to have been a product of highway design standards that are now widely recognised as having been inappropriate, combined with a reluctance by highway authorities to take on the maintenance of street trees. This really isn't acceptable, and certainly not in Taunton as a 'Garden Town'.

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

Please provide comments (250 words max):

There needs to be a programme of 'retrofitting' roads and streets with trees.

It is often said that residential gardens are an important wildlife reserve, but how true is this given their small size and the frequent paving of gardens for car parking, reduced maintenance, etc? Might it not be better to encourage smaller dwellings to be provided in the form of apartments, with adjoining public spaces being more able to accommodate large tree species?

The pressures that development near to areas of sensitive countryside appears to be recognised in 6.7.3. It has been quite noticeable over the past 40 years, as use of the roads and demand for parking in the Quantock Hills and Blackdown Hills ASONB has thereby increased. This needs logically to be reflected in the location of new development.

9. Thriving coastal and rural communities

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

Not Answered

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

Please provide comments (250 words max):

The majority of settlements outside the main towns should arguably be classed as 'open countryside'.

Consider extending the Area of Special Control of Advertisements to cover that portion of the Blackdown Hills AONB that lies with SW & T. The Devon part of the AONB appears already to be so protected.

10. Wellbeing of our residents

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

Please provide comments (250 words max):

Fully support these intentions.

11. Policies for our places: Taunton

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

Encouraging car-free developments (which could include allocating specific sites for car-free developments).

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

I would not be in favour of encouraging general needs housing with only 1 bedroom: sufficiently high densities can be achieved with 2-bedroom dwellings, and the housing is more 'liveable' as a result.

There may be some sites where lower-rise is necessary, for example to avoid overshadowing, but overall, one would hope that all new development in central Taunton would be at least 3-4 storeys. The Council should specifically identify the appropriate scale of development on particular sites or areas within the town centre.

Even if a development cannot be completely 'car free', there may be scope to reduce the on-site parking requirement. For example, parking should where possible be communal rather than allocated to individual dwellings (which tends to result in over-/under-use of the spaces).

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

Please provide comments (250 words max):

10b/1 This is fine, of course, but it must not become a 'housing by default' approach. There is a material difference between Firepool, which has the unique locational quality of proximity to the railway station for 'trip-end' uses, and sites elsewhere in the town centre, where housing would clearly be more appropriate.

Experience of how places developed successfully in the past suggests that what matters is the creation of new streets, along which individual plots can then be developed as demand materialises - the precise uses are, by definition, almost impossible to predict at the outset.

10b/2 The word 'compact' does not seem quite right - it seems to imply a shrinking of the commercial area. Surely one does not want to see shop windows in Station Road and Bridge Street disappear: among other things, this would 'deaden' these areas as experienced by visitors walking from the railway station. On the other hand, there almost certainly is scope to intensify the use of the area as suggested.

10b/4 This may be controversial in some quarters, but there really does need to be a 24/7 closure to non-essential traffic of the 'inverted T' of North Street, East Street and Corporation Street. Otherwise, the town centre cannot really be enjoyed by evening users, or enhanced in line with 'best practice' elsewhere. The Parade was, after all, the town's original market place and not a traffic roundabout.

10b/5 The Council needs to dust-off the proposals in the 2004 Urban Design Framework for the town centre - consolidation of parking was a key aspect.

10b/7 This is an area where Taunton has lagged behind comparable towns. In terms of new development, it is not sufficient to rely on the reactive process of 'design review'; design briefs for key sites need to be prepared by the Council. Apart from the Castle Green area, there has been no significant investment in the 'floodscape' of the town centre since the 1990s; much of what is in place is either old, of basic quality materials, or both.

10b/9 Efforts are needed to improve access to the hospital by public transport - for example, by extending buses from North Taunton to the site, and by providing a bus link through the site to Comeytrowe.

12. Policies for our places: Wellington

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

Please provide comments (250 words max):

Historically there has been too much employment land allocated in the Wellington area when compared to Taunton and, indeed, the population of the town itself. This has resulted in reverse commuting from the larger to the smaller settlement.

Further employment development in the Chelston area will only result in more car commuting using the M5, often by people who do not live in the Somerset West and Taunton local authority. This does not seem appropriate given the sustainability challenges that are currently being faced.

There is a need to address the amount of traffic and relatively low quality of public realm in the town centre.

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):

It is an anomaly that there is no '24/7' public rail service linking Taunton with Minehead, Watchet and Williton over the West Somerset Railway. This is something that needs to be pursued as a priority by the District and County Councils.