

Response ID ANON-8CC9-KD8A-Y

Submitted to **Local Plan Issues and Options**

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Your details

What is your name?

Forename:

Barry

Surname:

James

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

Organisation

If individual, please tell us what type:

Resident of Somerset West and Taunton

Name of organisation:

Planning & Development Services Ltd

Please choose one from the drop-down list:

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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):

The objectives are correct however I would suggest, along with Taunton's principal role, that Wellington's role as a sub-strategic town should merit direct reference in Objective 2. Objective 5 should be a given; infrastructure should be delivered at the correct time to support development. Objective 8 appears a slightly odd amalgamation of objectives; it refers to boosting agricultural transformation, and I would suggest treading carefully on "transformation" of this sector without clarity on how planning can deliver this.

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):

The Plan should aim to facilitate a major shift towards increased energy efficiency and other measures to meet the climate challenge. It should be ambitious but also realistic and allow sufficient time to make the change, allowing technology to keep up. Communities and developers should be incentivised to deliver

development that helps to meet the targets set. A Local Development Order would be one effective way of doing so and show a strong intent to deliver.

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):

It is logical to focus on Taunton but infrastructure is a critical part of facilitating more development effectively. Wellington's contribution should not be underplayed, and the percentage of development it is allocated should reflect its ability to grow and accommodate further 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)?

No - Watchet and Williton should be seen as separate settlements

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

There are services and facilities that complement each other in these settlements but there are distinct cultural differences that should be respected. In planning terms, both settlements are capable of delivering sustainable development in their own right and in their own style, and this should be the primary focus. Whilst both settlements could provide a range of services and facilities they are inherently of a separate character.

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 Wellington; and reduce in Minehead and Rural Centres

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

Wellington has scope for further growth primarily because infrastructure improvements of an appropriate scale and connectivity can be provided more easily. Taunton has struggled to accept further growth and additional planned development will increase pressure on existing infrastructure (mainly the highway network). Wellington has the capacity to grow and contribute more to the Council's growth. This will mean the Council will need to review its approach when it comes to protective green wedges and how green infrastructure works within the town.

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

Please provide comments (250 words max):

Housing distribution should fully take into account the pressure it creates on the highway network. The Council area remains a largely rural area and the balance between transportation needs of urban and rural residents needs to be fully considered. Phasing of infrastructure is critical and a specific policy should be included in any future local plan which makes it clear to developers that their schemes will work in tandem with the infrastructure, rather than proceed at a speed where it is keeping up with the growing demand.

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

Please provide comments (250 words max):

Agree with working on reducing the need to travel; in towns like Wellington and Taunton this means that development needs to be easily accessible by means other than private vehicle. Connectivity to the town centres from new developments is critical to the success of growth. There are opportunities to build in areas that are currently green (e.g. between Chelston and Wellington, between Rockwell Green and Wellington) and would help deliver the growth required without further outward urban spread. A fresh view is needed of land such as this.

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):

A minimum figure should be set for practical reasons. With defensible and comprehensive evidence, and continued delivery of housing to meet the 5 year land supply requirement, the Council can be robust against challenge and ensure that sufficient housing comes forward.

Too much reliance on major urban expansion sites should be avoided; a range of major sites (up to 200 units) is likely to be more attractive to developers and therefore the strategy of the new Plan should reflect this.

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

Require a proportion of development sites to provide an area for residential Traveller pitches; and/or

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

The answer to this is a mixture of these; the form would not let me progress without choosing one. Criteria-based policies can work but rarely bring forward sufficient sites. There are mixed results in delivering traveller pitches as part of strategic allocations (recent experience in Mid Devon and East Devon differ

significantly) but it is still a solid way of delivering sites in sustainable locations that meet the needs of this particular community. Sites rarely come forward voluntarily in the open countryside and are approved so the Council has to find a way to deliver to meet need identified through the Gypsy and Traveller Accommodation Assessment.

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):

Absolutely should require adaptable homes; designing for lifelong homes is a logical response to the evolving needs of an ageing population.

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

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):

Some policies encourage custom/self build plots (CSB); this isn't a strong enough policy approach to make sure they are delivered. If there is an identified need on the Council's register then a) plots as part of a large major development, and b) specific CSB sites and c) encourage developers to bring them forward either as a rural exception in a sustainable location should all be allowable under policy. Teignbridge District Council has a very proactive approach to this issue including a useful SPD.

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

Please provide comments (250 words max):

3e/1 - agreed.

3e/2 - agree to a point, however viability assessments should be open book; major developers use BCIS or similar method when they are actually able to develop much cheaper than these measures. Viability assessments are simply not accurate and loaded in favour of developers. If they agree to an open book approach then they can be useful, but not otherwise.

3e/3 - I would say the best way to do this is on evidence of need and policy should be flexible enough to allow deliver to match what the requirements are.

3e/4 - this is a sound idea but will take time, during which the Council will potentially be open to challenge. Contain as much within the Local Plan as possible would be my advice.

3e/5 - agree to all these. Housing to meet the widest range of requirements as possible would be the best way forward.

3e/6 - NDSS-sized housing is sensible but I would suggest allowing a small percentage for smaller units. The reason being, some smaller units may be at a price point some people can afford and allow them to get on the ladder, rather than be lost to private rental. A percentage of 10% to 15% should suffice.

3e/7 - agree.

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?

Develop bespoke and realistic growth ambitions linked to the Council's Economic Development (Prosperity) Strategy (i.e. increase the proportion of higher value jobs within existing overall job numbers and not pursue a significant increase in job numbers overall); or

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

The Local Plan should work as effectively as possible for the requirements of the area. The HoSW growth ambitions are laudable, and can be adopted perhaps for the key strategic settlements of Taunton and Wellington, but there needs to be an approach that works across the district, and a bespoke one should be delivered.

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):

A review of the sites is sensible to ensure a modern and up to date approach. The Monkton Heathfield expansion changed due to more recent evidence and the Plan should be based upon the most up to date information possible. I would suggest that flexibility over the Plan period will serve the Council well.

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

Please provide comments (250 words max):

Agree with all these. Mixed/multi-use sites with a range of uses are a sensible approach. The problem with town centres is significant, and the Plan should explore how it allows their adaptation. Upper floor uses are a good area to develop and evidence should be used to inform policy direction.

4c/9 - this should be an SPD/DPD and possibly not part of the Plan itself.

6. Infrastructure

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

IO - 5a - ranking - Affordable housing:

3

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

2

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

4

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):

A tough decision between strategic infrastructure and designing for climate change; ideally they are both the top priority. The historic transport infrastructure in towns like Taunton simply isn't up to the job of catering for the expanding population and uses. New development should be focused in areas where infrastructure can be delivered to best meet the needs of the new residents/businesses. Wellington is worth exploring as a more adaptable location than Taunton where highways feel close to capacity at peak times.

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):

Viable and easy-to-use transport options that don't rely on the private car have to be provided. Facilities and services need to be close to residences. Upper floor conversion in town centres, localised facilities built as part of developments, increasing the inconvenience of private vehicle use, all contribute. Public transport will only happen where it is viable and cost effective; rural transport has to be useful but convenient. Smaller means of transport, community share vehicles/co-cars, may be part of the solution (and can be required as part of delivering applicable planning permissions).

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

Please provide comments (250 words max):

All agreed. Providing for future development in connectivity is an important consideration of modern development and should be enshrined in policy.

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):

Biodiversity net gain is mandatory and additional measures are essential. Integral bat and bird boxes on say 50% of all new homes are an easy policy option. Maximising planting (native species). Use of SUDS for habitat provision. Hedgehog passages in garden fencing. Protecting existing bat flight routes. Keeping areas of developments clear of human intervention. Creating green corridors. All these measures will be useful in delivering a biodiversity net gain.

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

Please provide comments (250 words max):

Agree with these sentiments; I would suggest however that there should be a review of protective local designations to ensure they are still fit for purpose and allow appropriate and sustainable development where it can be acceptable. The Green Wedge designation should be more flexible and allow development that can bring community benefit (not just further solely residential, housing estates). There are opportunities between Chelston and Wellington, and Wellington and Rockwell Green, for development that brings community benefit which will protect land outside the settlements. The designations should be positive about being protective but also open to appropriate developments that can still retain significant green areas.

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):

8b/1 - agreed. Whilst development in these locations are strictly controlled there should still be an opportunity to allow the rural area to evolve appropriately.

8b/2 - agreed.

8b/3 - support for farm diversification should be enshrined in the Plan. Whilst beneficial I don't think this should be restricted to responding to climate change/mitigation; proposals should allow for farm operations to adapt to modern needs to keep them viable and the plan should be flexible about this.

8b/4 - agreed in principle.

8b/5 - agreed but with strict control to avoid abuse.

8b/6 - agreed but with strict controls on landscape and visual impact. Coastal protection is important due to the negative impact of poor development.

8b/7 - agreed.

8b/8 - clearly this is an obvious point to agree and is already in train.

10. Wellbeing of our residents

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

Please provide comments (250 words max):

9a/1 - agree, some Councils use the 200 dwelling threshold but realistically this should be lower, say 50 units.

9a/2 - agree. A lot of work has been done on this, and the National Design Guide provides good context. I would suggest there is no need to reinvent the wheel (in the interests of getting a document adopted quickly).

9a/3 - agreed, bearing in mind the requirements of all public realm users (and the fact that many modern residential estates are poorly designed for most vehicles).

9a/4 - agreed, with some flexibility if there is community support for change.

9a/5 - obviously yes and should be included in the local list for validation of applications.

9a/6 - absolutely, there should be requirements imposed for these. Public art could be so much better and I would like to see requirements for most major developments imposed.

9a/7 - agreed.

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):

A mixture of the above may well be the right answer and the plan should allow that. Taller buildings will bring with them their own challenges, but regenerating the centre of the town could certainly benefit from more residents in the area.

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

Please provide comments (250 words max):

Agree with all these, however would want more detail on how 10b/5 could work. The highway network is a major constraint to Taunton currently and encouraging public transport serving useful parking locations is certainly important. The changes around Junction 25 should result in an improvement to the situation, not evidenced by what has happened to the Park and Ride.

12. Policies for our places: Wellington

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

Please provide comments (250 words max):

The policy approaches are not ambitious enough. The town has a lot of potential and this should be enhanced through opening up appropriate development, within easy reach of the town centre, and that brings community benefits (i.e. not just open market residential or employment uses). There are opportunities to enhance community services, provide a wider range of housing to meet community needs (e.g. housing for older people), care/medical/health facilities, good non-car connectivity, and to deliver these the Plan needs to be flexible and innovative.

There is a real opportunity to bring forward these developments in the town and the Plan needs to reflect this.

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):

All agreed; a bespoke approach to this area is sensible and will mean appropriate development can take place.