

**From:** [Laura Eimermann](#)  
**To:** [Povall, Sarah](#)  
**Subject:** RC-025 Bloor Homes South West Ltd 002  
**Date:** 13 July 2020 10:41:11

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Hi Sarah

Please find attached the Core Strategy Concept Diagram with the site location denoted.

Kind regards

Laura

**Laura Eimermann**  
Assistant Planner

## Turley

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**From:** Povall, Sarah [mailto:[S.Povall@somersetwestandtaunton.gov.uk](mailto:S.Povall@somersetwestandtaunton.gov.uk)]  
**Sent:** 10 July 2020 09:21  
**To:** Laura Eimermann  
**Subject:** RE: Bloor Homes South West Ltd

Dear Laura

Thanks again for the response from Bloor Homes. There is reference to an Appendix 1, which I don't believe was attached (but please correct me if I am mistaken) – would you mind

forwarding this?

Kind regards  
Sarah

Sarah Povall  
Strategy Specialist  
Somerset West and Taunton Council  
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**From:** Laura Eimermann [<mailto:laura.eimermann@turley.co.uk>]  
**Sent:** 13 March 2020 10:33  
**To:** Strategy <[strategy@somersetwestandtaunton.gov.uk](mailto:strategy@somersetwestandtaunton.gov.uk)>  
**Subject:** Bloor Homes South West Ltd

Dear Sir / Madam,

Please find attached a representation submitted on behalf of Bloor Homes South West Ltd to the Somerset West and Taunton New Local Plan 2040 Issues and Options Consultation.

I would appreciate if you could confirm receipt of this document. Please free to get in touch should you have any queries.

Kind regards,

Laura

**Laura Eimermann**  
Assistant Planner

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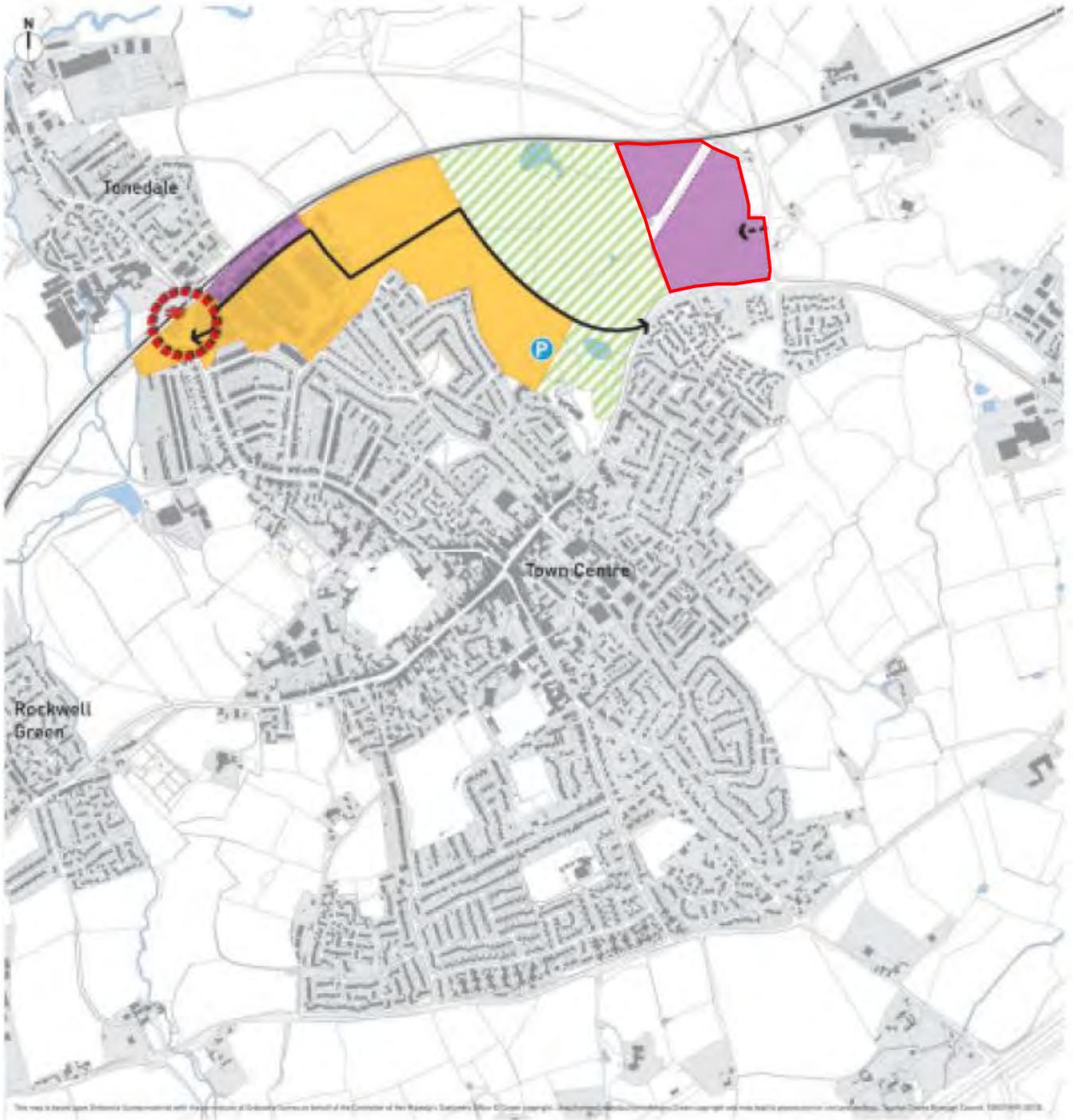
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# Site Location Plan



Site location, shown on existing Core Strategy Concept Diagram

**From:** [Laura Eimermann](#)  
**To:** [Strategy](#)  
**Subject:** Bloor Homes South West Ltd  
**Date:** 13 March 2020 10:32:36

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Dear Sir / Madam,

Please find attached a representation submitted on behalf of Bloor Homes South West Ltd to the Somerset West and Taunton New Local Plan 2040 Issues and Options Consultation.

I would appreciate if you could confirm receipt of this document. Please free to get in touch should you have any queries.

Kind regards,

Laura



**Laura Eimermann**  
Assistant Planner

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11 March 2020  
**Delivered by email**

The Strategy Team  
Somerset West and Taunton Council  
Deane House  
Taunton  
TA1 1HE

Dear Sirs,

## **REPRESENTATION TO THE SOMERSET WEST AND TAUNTON LOCAL PLAN 2040 ISSUES AND OPTIONS CONSULTATION**

This representation is submitted on behalf of Bloor Homes South West Ltd ('Bloor Homes') to the Somerset West and Taunton New Local Plan Issues and Options Consultation.

Bloor Homes have land interests in Wellington, to the North of Taunton Road and West of Nynehead Road Wellington, known as 'Land at Longforth' (demonstrated on the accompanying site location plan at Appendix 1). The site is immediately adjacent to a residential development which was previously developed by Bloor Homes.

Policy SS3 of the adopted Taunton Deane Core Strategy (2012) allocates a wider site at Longforth, Wellington. The western part of the allocation comprises the residential development which has since been constructed, and the site referred to as Land at Longforth forms the eastern part of the allocation and is identified for employment development on the Policy Concept Plan.

On behalf of our client, we submit the following initial (and high level) responses to the questions set out in the Issues and Options document in order to contribute to the discussion on the scope and content of the New Local Plan, at this initial stage. Our intention, as the Local Plan is progressed, is to make more detailed comments on emerging policies and issues, including those that specifically relate to Land at Longforth. These initial comments are therefore on a without prejudice basis to further comments we may wish to make as the Plan proceeds.

### **Question 1a: Should we aim to require that all new development 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?**

More time should be provided for all new developments to adhere to a zero carbon standard, to allow for developers to adapt their design approaches, materials and suppliers, and not have a significant negative impact on shorter term development viability and delivery.

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The Council should ensure that any policy within the New Local Plan relating to zero and low carbon requirements aligns with national guidance and the emerging Future Homes Standards. Consultation on the Future Homes Standards was conducted by Government between 1 October 2019 and 7 February 2020. The outcome of this consultation is awaited and a further consultation stage is also scheduled to take place prior to the adoption of the Future Homes Standards.

**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 above?**

The Issues and Options Document identifies three options (B, D and E) as potentially compatible with the draft Local Plan Objectives. We support the identification of Option E in the Issues and Options document which proposes increased development at Wellington, as well as noting that options B and D would retain the same proportionate split for Wellington as the existing distribution. This reflects the positive attributes of Wellington and that an appropriate spatial strategy will see the proportion of growth directed here to either be maintained or increased.

The adopted Taunton Deane Core Strategy identifies Wellington as a focus for housing and employment growth following the Taunton urban area. The Core Strategy recognises the size of Wellington as a town, the offer of services and facilities and its accessible location as justification for the adopted Settlement Hierarchy at Policy SP1. We support the proposal in the Issues and Options document to retain Wellington as the second tier settlement following Taunton.

Accordingly we support the proposed option to increase development at Wellington which remains a sustainable settlement able to accommodate growth, as recognised by the Settlement Hierarchy in current development plan and the Issues and Options document. The proposed re-opening of Wellington Railway Station, which is currently undergoing feasibility testing, would further increase the accessibility and sustainability of the settlement. By virtue, additional housing growth in Wellington would further enhance the viability of the re-opening of the railway station.

As stated in the Issues and Options document, we support the need to first identify the housing requirement figure, in order to then inform the proportion and distribution of housing across Settlement Tiers.

**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?**

We agree with the Council's objective for the New Local Plan to ensure the provision of a sufficient supply of housing. The Issues and Options Document refers to the Government's 'Standard Method' housing requirement figure for Somerset West and Taunton of 702 dwellings per annum, which would total 14,040 dwellings over the 20 year Local Plan period. The Council state that they already have commitments and sites identified as deliverable which total 14,088 dwellings, albeit it is not made very clear how this total is derived, in particular the basis of the 7,911 total for additional 'deliverable' dwellings and this should be confirmed and tested through the process.

In order to plan for sustainable development and sufficient homes across Somerset West and Taunton, a fully objectively assessed housing need should be identified to test the standard method figure as the 'starting point' and inform the New Local Plan. We understand that the Council are preparing a Housing Needs Assessment and this should be informed by the Government's standard method figure as a basis only. We consider that it would be inappropriate for the New Local Plan to plan for only the standard method housing figure noting that this is a minimum requirement and noting that upward adjustments, including adjustments to address affordability and to support economic aspirations, as examples, may be appropriate.

In addition, in order to support the Government's objective to significantly boost the supply of homes, as set out at paragraph 59 of National Planning Policy Framework (NPPF), the Council should plan for further flexibility beyond the Standard Method to ensure a consistent and sufficient supply of housing can be provided across the plan period. We therefore support proposal ii of Option 3a to use a higher housing requirement for the New Local Plan, with upward adjustments to that figure to be tested by more detailed housing need work.

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

In accordance with paragraph 16 of the NPPF, plans should be positively prepared and deliverable. Paragraph 31 of the NPPF states that the preparation of planning policies should take into account market signals.

We support the statement made by the Council in the Issues and Options Document recognising that releasing land for traveller pitches is a significant challenge as this has a much lower land value for landowners.

We object to Option 3b (ii) identified in the Issues and Options document, which would require a proportion of development sites to provide an area for residential traveller pitches. This option should not be progressed as a requirement of the New Local Plan as this would have significant viability implications and would negatively impact the deliverability of housing sites, and in turn the supply of housing.

### **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?**

The Issues and Options Document is informed by the Taunton and West Somerset Employment, Retail and Leisure Study (published in October 2018) and the Housing and Employment Land Availability Assessment (HELAA) published by the Council in March 2019.

The Employment, Retail and Leisure Study identifies that new build industrial development (B1c, B2 and B8) is marginally viable in prime areas and elsewhere it is sufficient to maintain the existing stock. The Study concludes that for unbuilt employment allocations, it is questionable whether they are viable to deliver at the moment, except those highly accessible sites which pick up a motorway premium. The Land at Longforth (comprising an unbuilt employment allocation) does not benefit from this.

Informed by the evidence base, the Issues and Options Document identifies that an excess of land is currently allocated for employment uses compared to demand. Accordingly, we support the Council's proposal to review employment sites and assess whether they should be retained for employment uses in the New Local Plan. We consider the employment allocation at the Land at Longforth requires assessment as part of this review, and particularly given its specific protection as a potential relocation site for Reylon and Swallowfield. This is discussed later in this representation.

In accordance with paragraph 118 of the NPPF, planning policies should encourage multiple benefits from urban and rural land, including through mixed use schemes. As supported by the NPPF and noting the findings of the Employment, Retail and Leisure Study, the consideration of alternative mixed-use development options for the Land at Longforth would allow flexibility and ensure the deliverability of the site for development, as well as potential for economic benefits aligned with evidenced needs.

### **Question 5a: On what infrastructure should we should prioritise developer contributions?**

It is essential that the plan strikes an appropriate balance between securing appropriate contributions towards essential infrastructure (via development contributions, either as S106 or CIL), the provision of sufficient affordable housing to meet identified needs, and maintaining development (and the plans) viability. Going forward via the Building Regulations and Future Homes standard there is unlikely to be significant local flexibility to vary these elements. Likewise elements of supporting essential infrastructure, such as road and school places, are less

flexible, meaning that most flexibility is likely to arise through the other local development standards (accessibility requirements) and affordable housing. The Council should ensure that the plan is robustly critiqued and tested in this regard to ensure that development viability can be achieved and maintained, across the plan area and plan period.

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

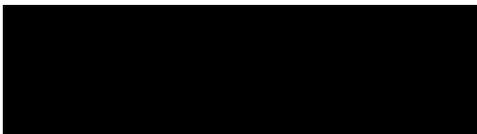
We do not support the proposed approach of policy 11a/4 to allocate “*land to enable the employers Reylon and Swallowfield to relocate, whilst remaining within Wellington as well as maintaining a Strategic Employment site near J26 and an employment at Longforth*”. This proposed approach would broadly replicate existing Core Strategy Policy SS3, where there has been no indication that relocation of these existing employers is required/proposed, and so there is no evidence to justify continuing to safeguard land for this purpose. The long term safeguarding of land for employment uses is not an approach which the NPPF supports.

As set out above in our response to Question 3a, the Council’s evidence base does not support the approach at policy 11a/4 to continue to safeguard land for the relocation of these employers, in particular the Land at Longforth as previously identified for this purpose. We consider the site offers a suitable and sustainable location for a mix of development uses in accordance with national planning policy, and so the Local Plan process should review the future use of this land.

**SUMMARY**

The New Local Plan must be positively prepared, justified, effective and consistent with national policy. We hope that our response is helpful and look forward to participating in the next stages of the Local Plan preparation.

Yours sincerely,



Jeff Richards  
**Director, Head of Planning South West**

jeff.richards@turley.co.uk