

From: [Simon Fitton](#)
To: [Strategy](#)
Cc: [Genevieve Collins](#); [Hughes, Cecelia](#)
Subject: David Wilson Homes - Local Plan Issues Paper: Representations submitted on behalf of David Wilson Homes
Date: 16 March 2020 17:35:52

Dear Sir/Madam,

Please see attached our representations on the Issues Paper on behalf of our client, David Wilson Homes.

I would be grateful if I could be added to your mailing list, and please do not hesitate to contact me should you have any queries.

I would be grateful if you could acknowledge receipt.

Kind regards

Simon

SIMON FITTON

Head of Planning /Partner

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Our Ref: GC/78232

16 March 2020



Somerset West and Taunton Council
Planning Policy Strategy Team
Deane House
Belvedere Rd,
Taunton
TA1 1HE

Dear Sirs

**REPRESENTATIONS TO SOMERSET WEST AND TAUNTON LOCAL PLAN
ISSUES AND OPTIONS DOCUMENT
PRIORSWOOD, LYNDFORD LANE**

I write on behalf of my clients David Wilson Homes with specific reference to the above allocated site that they are seeking to bring forward. The site is allocated for residential development under Policy SS2: Priorswood / Nerrols of the adopted Core Strategy (2011-2028, adopted 2012). It is subject to a current planning application (38/19/0129) for up to 347 residential units with associated works.

Under issue 5.2.2 'The Distribution of Housing' reference is made to the fact that, *"even though we have large numbers of housing allocated in the existing Local Plans, the sites should still be appraised to confirm whether allocations are still appropriate."*

This is considered to be a particularly unhelpful reference in the context of providing certainty to landowners, developers and the public that sites well advanced through the planning system should not be thrown into doubt via this wording. There is very limited probability of allocations that have proven to be sound should be queried; the only possible basis for review is if any such allocations have shown no signs of being brought forward. It would be the responsibility of the LPA to query these sites, but a wholesale review of adopted allocations is not considered appropriate.

These representations request that the Council seeks to incorporate an element of flexibility within their new policies in relation to extant allocated sites that are well-advanced through the planning process. Proposals for the development of Priorswood/Lyngford Lane have already been subject to extensive pre-application discussions, and consultation has been ongoing since the application was submitted in April 2019. More recently the proposals have been subject to a Design Review Panel presentation and amendments are being sought and made in relation to Taunton's Garden Town status. The proposals are seeking to meet the existing policy requirements in full. Notwithstanding this, with regard to matters such as climate change and energy requirements, as well as Health Impact Assessments and National Space Standards for example, we would request transitional arrangements are included in these emerging policies for extant allocated sites. This is on the basis that the design, numbers and viability of the site have already been committed on the basis of previous/extant policy.

With respect to Objective 1 (Carbon Neutrality) it is noted that there is a choice for zero carbon by 2025 or giving slightly more time for developers to update the processes and procedures, designs and materials by 2030. We also note that the supporting text indicates that the policy would be flexible as to how zero carbon could be achieved. We welcome and support these intentions and would request that such flexibility with a maximum requirement for 2030 is built into the wording of the policy. For committed sites already at an advanced stage in the planning process such as Priorswood, it would be helpful for the policy to confirm that such sites remain in compliance with

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13 March 2020

-2-

Somerset West and Taunton LP Representations Reg.18



extant/previous policy and/or simply have to comply with the appropriate Building Regulations level at that time for the avoidance of doubt.

With respect to Objective 3 (High Quality Homes), we would confirm that this site is developable and deliverable. It is intended that the majority of the site will be built out within the first five year plan period of the emerging Local Plan. We note that there is an option to provide a proportion of lifetime and accessible homes (Option 3c) and also to require internal space of dwellings to meet the Government's space standards (3e/6). DWH will meet Building Regulations requirements Part M on site but we would request again that transitional arrangements ensure that nothing more is required for allocated sites that are at an advanced stage of preparation. The same goes for the applicability of the Government's nationally described space standards; there should be transitional arrangements at the very least to apply to those allocated sites which are already being considered through the planning system.

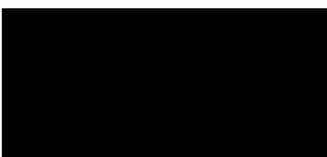
It has been noted that there are some discrepancies between extant adopted Neighbourhood Plans and policy content; not least that the relevant adopted Neighbourhood Plan for Priorswood (West Monkton and Cheddon Fitzpaine Parish Council Neighbourhood Plan (2017)) seeks a different tenure split for market and affordable housing than the existing local plan policy. It would be helpful for the LPA to take the opportunity to ensure consistency across the development plan.

With regard to Objective 5a and 5b (Infrastructure) questioning developer priorities in relation to infrastructure funding, the approach is welcomed and is supported. Notwithstanding this, in our view a flexible approach should be enshrined within the policy enabling developments to be assessed for infrastructure on a site by site basis. This would better allow the proposed development to meet the unique needs of the locality and community in the context of site merit. This type of flexibility would be a welcome incorporation in the policy wording and would enable discussions and appropriate delivery of sustainable locally distinctive development in an efficient and effective way.

Objective 9a/1 (Wellbeing and Health) references Health Impact Assessments for larger developments. The intention is supported and the Healthy Urban Development Unit has a rapid assessment form which provides useful details for a HIA that is not time consuming or costly to produce. Notwithstanding this, transitional arrangements are sought in relation to application of such a policy requirement on existing applications on site allocations.

The format of the Plan is easy to read and the summary is helpful. We look forward to further information to help us understand the emerging policy position better, and making detailed submissions at the Regulation 19 stage should it remain appropriate.

Yours faithfully



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