

**From:** [Shelley Coffey](#)  
**To:** [Strategy](#)  
**Subject:** GF Enterprises - LOCAL PLAN 2040 Issues & Options Consultation Response  
**Date:** 16 March 2020 15:46:48

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Dear Sir / Madam,

Please find attached representations on behalf of our client GF Enterprises Ltd to your Issues and Options consultation.

Please acknowledge receipt at your earliest convenience.

Kind regards,

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Associate Director – Planning

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LOCAL PLAN 2040  
ISSUES AND OPTIONS  
CONSULTATION RESPONSE

ON BEHALF OF  
GF ENTERPRISES LTD

 Rural Solutions

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SOMERSET AND WEST TAUNTON LOCAL PLAN 2040  
ISSUES AND OPTIONS DOCUMENT CONSULTATION  
REPRESENTATIONS

ON BEHALF OF  
GF ENTERPRISES LTD

ISSUE DATE  
16<sup>TH</sup> MARCH 2020

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## I. INTRODUCTION AND APPROACH

- I.1: This document is prepared on behalf of GF Enterprises Ltd in response to the Somerset West and Taunton Local Plan 2040 Issues and Options Consultation.
- I.2: It provides an introduction to Glebe Farm, now under new ownership, and sets out the future vision for the Glebe Farm landholdings.
- I.3: It then contains responses to the questions raised in the Issues and Options document on behalf of GF Enterprises Ltd.

### CONTEXT

- I.4: The Glebe Farm landholding has recently (January 2019) been acquired from the Crown Estate by GF Enterprises Ltd.
- I.5: However, Glebe Farm had been farmed by the Ashton family for a number of generations, previously under a tenancy from the Crown Estates, where the family ran a successful dairy venture. Glebe Farmhouse is the family home.
- I.6: The Glebe Farm holdings comprise of c. 155 acres around the village of Cheddon Fitzpaine.

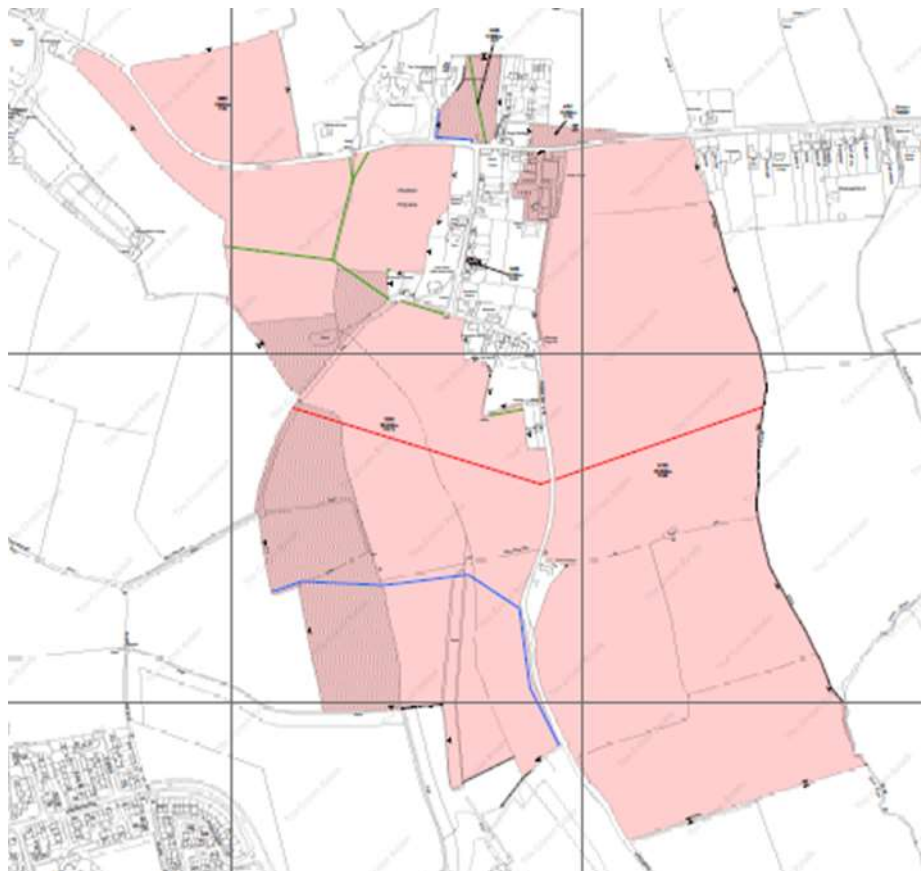


Figure 1: Glebe Farm landholdings shown in pink



1.7: A more detailed Vision Document is being prepared to capture GF Enterprises Ltd.'s vision for the landholding moving forwards. In summary, there is a desire to bring forward appropriate development to aid the future sustainability and viability of the local community, within a framework of providing access to increased and useable green spaces and promoting healthier lifestyles.

## 2. THE ISSUES AND OPTIONS

- 2.1: Our responses on behalf of GF Enterprises Ltd are set out over the following pages. The responses are structured following the council's questions as set out within the Issues and Options consultation document.

## Objective I - To ensure all new development works towards the District's carbon neutrality by 2030 target

*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?*

We support the council's objectives to generally improve the quality of new development being brought forward, including their energy efficiency, to ensure we deliver highly sustainable, quality, future-proofed and aspirational homes.

*Question 1b: Should we allocate sites for specific renewable energy development or identify broad areas which we consider suitable?*

To maximise potential energy generation opportunities and be best responsive to emerging opportunities including changing technologies and government priorities, we would support Option ii) to adopt a criteria-based approach which sets out the circumstances when such developments would be acceptable.

*Question 1c: Do you have any comments on these (additional) policy approaches?*

We generally support the additional suggested policy approaches IC/1 to IC/7.

## Objective 2 - To enhance the role of Taunton town centre in the sub-region and to strengthen the function, vitality and self-containment of all our towns

*Question 2a: Do you agree with the tiers that identify Taunton followed by 6 tiers covering the other settlements. If not, what changes would you make and why?*

We agree with the continued focus on Taunton as the main settlement and focus for development. Consideration should also be given to how proximity and accessibility to Taunton contribute to the sustainability of other neighbouring settlements.

The Framework does not expect every community to have access to a minimum level of services (i.e. there is no requirement for “self-containment”).

Proximity to major centres, their services and facilities, and public transport connections, can make a rural settlement more sustainable than one in a more isolated location.

For example, in the case of Cheddon Fitzpaine, the settlement has existing limited services within the village itself, these being a church, primary school and village hall, located sporadically through the north of the parish. However, the village is within 3 miles of the centre of Taunton where major employment, retail and transport links can be accessed. In closer proximity, the local services can be accessed in Monkton Heathfield (1.5 miles) including a secondary school and sixth form centre, Co-op Food store, butchers store and public house; and in Priorswood (1.7 miles) including a doctors surgery, post office, food stores (Co-op Food and Tesco Express) and schools (primary and secondary).

Whilst a bus service does not pass through Cheddon Fitzpaine, the Number 2 bus does link Priorswood and Monkton Heathfield with Taunton, meaning multi-modal journeys would be possible.

Whilst not all journeys are realistically likely to be made by public transport, many journeys made by private vehicle will be short, which reduces their transport impacts both in respect of congestion and highway capacity, and emissions and climate change.

We generally support the seven proposed settlement tiers. However, we note the council's acknowledgement that these tiers and specifically the position of settlements within the tiers, particularly those lower tiers which contain smaller rural settlements, are based on the adopted Local Plan of the district, and that a review of these tiers will be required to ensure that they reflect the current role and function of the rural settlements.

As noted in our response to Question 2a, this should include consideration of any close functional relationships between individual settlements, in line with paragraph 78 of the Framework.

In the case of Cheddon Fitzpaine, this should include acknowledgement of the recent strategic allocations being developed at Priorswood/Nerrols and Monkton Heathfield. These strategic allocations will deliver improved facilities in close proximity of Cheddon Fitzpaine including a new district centre at Monkton Heathfield and a new local centre at Priorswood/Nerrols including a significant range of services and facilities including retail, employment and community facilities, and improved public transport infrastructure.

A further consequence of the Priorswood/Nerrols Garden Village extension is the allocation of a new country park and aspiration within the Core Strategy, to see ecological green corridors developed linking Priorswood and Cheddon Fitzpaine. GF Enterprises Ltd is supportive of facilitating the development of such links within their land ownership, working with the parish council. Such links would further aid connections and access to services and facilities for the residents of Cheddon Fitzpaine.

A willing landowner, with the ability to affect and help deliver improved facilities within a settlement, should also be considered relevant to any considered revisions to the grading of settlements within the Settlement Tiers. Further details will be provided in due course to supplement these representations.

*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 comments on the classification of Watchet and Williton for the purposes of the Local Plan Settlement Tiers. However, we would comment generally, as above, that proximity and functional relationships of all settlements should be considered in respect of reviewing the sustainability of settlements through access to services and facilities.

*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?*

It is noted that the council acknowledges that overall housing requirement figures are yet to be determined. It is suggested that until the required overall number of houses is known, it is not possible to robustly assess whether certain distribution options such as Option 2c iii), which is dependant on the infrastructure (e.g. highway) capacity of Taunton, are feasible.

We support the consideration of proximity to key transport infrastructure, including the M5, as one reasonable approach to the distribution of housing. However, this should not preclude the development of rural housing where the development will result in high-quality additions to settlements.

Whichever distribution option is pursued this must allow a sufficient level of development in the lower tier settlements to support their vitality. We would suggest this needs to be stronger than the 'maintain vitality' as currently suggested by Option 2c ii), but instead reflects the position of Paragraph 78 of the Framework, which supports development which maintains or enhances the vitality of rural settlements. This, therefore, requires consideration of the future potential for a settlement to host development, and the positive contribution such development may make to its future vitality.

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

We generally support the additional policy approaches in particular 2b/4 and the support for small sites in line with the settlement strategy and other policies.

The detailed policies of the plan should also set out provision for the reuse of redundant buildings and sites for appropriate redevelopment, including reflecting the provisions of government permitted development rights, and the additional flexibilities and support for rural development, which the government has imparted through the Town and Country Planning (General Permitted Development) Order (GPDO).

The council should remove the current requirement for a sequential test in relation to residential conversion. This approach is not consistent with provisions of Para 79 C of the NPPF.

The council should also build in flexibility to recognise the potential for new build residential on sites where Class Q might otherwise be applicable particularly where this will make better quality development.

Finally, affordable homes requirements should be brought into line with national guidance.

## Objective 3 - To provide a sufficient and varied supply of high quality and affordable homes to meet the needs of all sections of our communities

*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 Government Standard Method figures are minimums and we consider West Somerset and Taunton Council should seek to develop its own housing requirement figure which not only meets these minimum requirements but aspires to deliver transformational growth where this supports economic growth or infrastructure delivery, in both the urban and rural areas of the district.

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

No comment.

*Question 3c: Should we require all new housing developments to make sure that a percentage of the new homes are designed to be accessible, adaptable and wheelchair accessible?*

No comment.

*Question 3d: Should we allocate sites and/or make sure a percentage of housing developments are for self-built plots for people wanting to build their own homes? Should we allow self-build plots on Rural Exceptions sites provided that they are affordable?*

We support both the allocation of land for self-build plots and the inclusion of self-build plots on rural exception sites.

The council should also consider the use of an exceptions policy for self and custom build sites, not just where the units are affordable, but also where they meet proven demand for self and custom-build properties not otherwise being met in the district.

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

We generally accept the proposed additional policy approaches.

We would recommend that the plan sets out a clear requirement for affordable housing contributions and that the reliance on a Viability Assessment approach is limited to developers wishing to reduce contributions and is not a burden on all development sites.

Housing mix and tenure should be prescribed locally based on evidence and set out clearly within an adopted guidance document.



Objective 4 - To create a prosperous, resilient and entrepreneurial economy ensuring competitiveness across the wider sub-region and attracting the most talented workers to the district

*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?*

No comment.

*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?*

We would suggest option iv) provides the most flexibility and the greatest opportunity for the council to allow landowners to respond to changing demands, and to ensure the most efficient use of land within the district.

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

We support the policy approach outlined in 4C/3 for the conversion of premises to employment use to make the best use of land. This should include in suitable locations within the lower-tier rural settlements to improve the sustainability and employment choices in rural communities.

Objective 5 - To ensure that new development is supported by essential infrastructure in a timely manner

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

No comment.

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

No comment.

## Objective 6 - To achieve a major change in travel behaviour towards walking, cycling and public transport and to reduce the need to travel

*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?*

GF Enterprises Ltd is supporting the aspirations of the Parish Council and the Taunton Deane Local Plan to provide better green routes and connectivity from Taunton through the green wedge to the countryside and the Quantock Hills AONB to the north. This would not only improve access for Taunton residents to the surrounding countryside but would also improve connectivity from Cheddon Fitzpaine to neighbouring settlements and services, including public transport connections, providing quality connections will encourage less car use for short journeys; resulting in healthier and more active lifestyles.

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

We generally agree with the proposed additional policy approaches, subject to the consideration of feasibility and viability of such measures, to ensure they do not stifle the delivery of otherwise sustainable development.

## Objective 7 - To protect and enhance the environmental, historic, economic and wellbeing value of the district's distinctive landscapes, biodiversity and local character

*Question 7a: Are there any specific measures that you would like to see new developments deliver to improve biodiversity locally?*

No comment.

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

We generally agree with the proposed additional policy approaches and consider they outline an appropriate approach to the management of the natural and historic environment.

GF Enterprises Ltd is committed to supporting local aspirations to deliver green links and ecological corridors through its land, enhancing local connections and public access to the countryside and green space, and managing the environment to deliver net gains in biodiversity and ecology.

## Objective 8 - To boost tourism, economic development, agricultural transformation and deliver more affordable homes in our rural and coastal communities

*Question 8a: Should we keep or remove settlement boundaries? Or should we have settlement boundaries in areas where there is higher pressure from development i.e. closer to Taunton, Wellington and Wiveliscombe but remove them in more remote areas to provide more options for development?*

We have considered the proposed options in addition to the supporting discussion within Topic Paper 2: Settlement Boundaries.

We would support not having settlement boundaries around the smaller tier rural settlements and having a more flexible approach which allows appropriate development to meet identified needs, and/or with local support, to be brought forward subject to important planning considerations such as landscape and heritage considerations.

We would also agree that the dispersed nature of some rural settlement means settlement boundaries are not necessarily an appropriate tool. For example in the case of Cheddon Fitzpaine, key community facilities such as the primary school and village hall are located to the western edge of the parish and currently outside the settlement boundaries which currently lie drawn just around the central cluster of properties east of Maidenbrook Lane. This means not only does the settlement boundary not truly relate to the village as a community but also means key facilities sit outside it and are subject to additional constraints due to an 'open countryside' location, restricting potential key expansion or development requirements.

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

As an alternative to Settlement Boundaries, we would, therefore, support a criteria-based approach to determine development proposals against.

In respect of generally supporting appropriate rural development, we would also support the additional approach outlined in 8b/4 for support for farm diversification and transformation. Not only does this need to respond to addressing climate change impacts and mitigation, but also changing agricultural practices and economies.

## Objective 9 - To improve wellbeing, inclusivity and a reduction in inequalities enabling independence and facilitating social interaction

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

We generally support the additional approaches set out to meet objective 9, including the proposed approach in 9a/2 which seeks to require high-quality design in all developments.

It is noted that the council proposes to deliver a Supplementary Planning Document on Design. Any policies and guidance should align with the findings of the Building Better Building Beautiful Commission's report 'Living with Beauty', which aspires to deliver 'beauty' in development, which it defines as 'everything that promotes a healthy and happy life, everything that makes a collection of buildings into a place, everything that turns anywhere into somewhere, and nowhere into home'.

This aligns with the aspirations of GF Enterprises Ltd to deliver quality and aspirational development and create places where people want to live and can live healthier and happier lifestyles, and which contribute to the quality of place.

## Policies for our places

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

No comment.

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

No comment.

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

No comment.

*Question 12a: Do you have any comments on these policy approaches?*

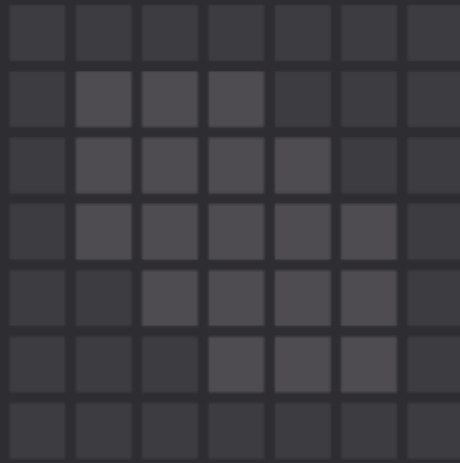
No comment.

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WE ARE RURAL