

From: [REDACTED]
To: [Strategy](#)
Subject: Helen and Nigel Fry
Date: 13 March 2020 17:11:53

Sir/Madam

Please find enclosed our comments for your consideration in developing the local plan 2040 for Somerset West and Taunton.

Regards

Nigel Fry



13 March 2020

Dear Sir/Madam

LOCAL PLAN 2040 SOMERSET WEST AND TAUNTON COMMENTS AND CALL FOR SITES

You are seeking comments for the local plan 2040 and we enclose our comments for your consideration.

An application for development of a site was made (42/17/0005) in March 2017 on Wild Oak Lane in Trull. This was to be a self-build property which went to appeal and was dismissed. As part of this process we learnt a lot about the planning process, and we consider that there are several areas that need to be improved and a more progressive approach applied by the Council. We would therefore like to comment on specific questions and policies raised in your options paper. These are areas where we consider that if changes were made in the policies adopted it would enable wider opportunities for a choice of high-quality homes and greater opportunity for people to build their own homes as part of the mainstream housing option.

1. Settlement boundaries (Option 8a)

Settlement boundaries are a tool to form coherent and established built up areas within which further development, will in principle, be permitted.

The existing settlement boundaries in Taunton set some time ago are tight and which has lead to high intensity development and “garden grabbing” and which has a detrimental effect on the character of the build around it. The Council, unable to fulfil the demand with these restrictions, are then forced to grant larger developer led housing schemes rather than allow their planning officers to use their spatial planning experience to grow the town organically.

This needs to change to recognise a more rounded approach to the way neighbourhoods operate recognising that local character evolves over time.

Growth needs to be directed towards the most accessible and well-connected places, making the most efficient use of the public transport and walking and cycling networks, making them work not only more space-efficiently, but also in a better way for the people who use them. Allocating growth to specific sustainable areas on a hierarchy basis and then loosening settlement boundaries in these areas to accommodate the allocated housing could be a way to achieve this.

Considerations should include

- Looser settlement boundaries, which could consist of larger gardens and buildings and land on the edge of villages in order to allow communities to grow, support existing facilities and avoid 'cramming'.

- Amend settlement boundaries to address anomalies, inconsistencies and the removal of back land
- Small infill development where the existing boundary does not reflect what is evident on the ground.
- Allowing more small-scale housing development to take place in local villages with key services and facilities.
- All development should take account of the form and character of their setting.

At the last formulation of the local plan, the Council prepared a topic paper relating to settlement boundaries in connection with its preparation of its SADMP. When assessed against the three criteria used (of physical constraints, location constraints and impact considerations) , it is considered that the site of our proposed development on Wild Oak Lane would have had a very strong case for the site to have been included within the settlement boundary, had the question been asked at the plan making stage. It wasn't in this case and so the matter was not assessed by the Council.

2. Health and wellbeing and the green wedge designation (policy 5.10)

Green wedge designations are strategic areas of undeveloped land between the urban areas that prevent the merging of settlements, and provide 'green' access into the countryside from the urban areas.

The Council's 2015 assessment of the green wedge report contains very little detail and certainly no site-specific commentary on the extent to which the boundaries were interrogated. The evidence base underpinning the policy at that time therefore did not represent a robust assessment and the land requirements of the Green Wedge were not properly assessed at a site-specific level.

This latest review should look in more detail and include site visits to the different areas of the green wedge. Individual reports need to be produced for each area looking at the boundaries, separation, natural environment value, historic environment value and flood risk to ensure that the green wedge is justifiable and fit for its aims going forward.

3. Local neighbourhood plan involvement (objective 2b/4)

In a Neighbourhood Plan, communities can allocate sites for development, but only about half do. This means identifying land in their Neighbourhood Area for future development and to what purpose. This means that communities are more likely to protect areas they want to see remain the same, by constructively suggesting alternative areas to be developed.

One excellent example is the Thame Neighbourhood Plan which allocated 770 new homes to six sites dispersed around the town as opposed to the single site the local authority had been proposing. More local plans should allocate specific land for development.

Trull neighbourhood plan did not suggest any sites for development when it was developing its neighbourhood plan and has been vocal in the objection to any development within the village. This is in part no doubt as a result of the large development planned in the area but also shows a lack of foresight in its vision for the village.

In order to ensure that communities feel that they have a part in the development of their environment and as part of the Council's growth plan, the neighbourhood plan forum should be encouraged to be included in the decision as to the specific sites where development could be placed once the Council has decided how many properties would be sustainable in that particular area.

4. Local green space (objective 7b/5)

Local Green Space as part of the neighbourhood plan is intended to provide special protection for green areas of importance to local communities.

This designation should only be used:

- Where the green space is reasonably close to the community
- Where the green area is demonstrably special to the local community
- Where the area is local in character and is not an extensive piece of land

In the Trull neighbourhood plan, Trull Meadows and neighbouring fields were designated as green space. Trull already has an extensive public green space which is accessible to all and fully inclusive to all in the community. Trull meadows is only really accessible to walkers whereas a number of the neighbouring fields are private and are not accessible to the public. The landowners were not consulted when the green space was drawn up and were given no opportunity to make any representations. Recently a plot of land within the green space according to the neighbourhood plan was given permission for development as it was not in fact capable of being designated as such thus calling into question the robustness of the green space designation in the first place.

Neighbourhood planning and the designation of green space are undoubtedly very important in the growth of local communities and it is vital to include the residents of these communities to be involved in the shape of their own neighbourhood, but the local council should do more to ensure that these neighbourhood plans will be progressive for the community and not the other way around. Areas of green space incorporating playing fields and community facilities must be provided and there should also be green walkways connecting the town so that communities can enjoy the health benefits of exercise, but these should not be large swathes of land and the designation should not be at the expense of forcing development out into open countryside or large scale housing developments in order to fulfil housing requirement.

5. Self-build 5.3.4 (option 3d)

Under the Self and Custom House building Act 2015, the Council is required to create a register of those interested in Self Build and Custom House building projects. TDBC has had such a register since 2015. The register is used by the Council to understand the demand which exists for Self-Build and custom House building developments.

At present the council does not have any land allocated for self-build nor is it positively encouraging self-build in the area. Individuals find it extremely difficult to find plots and then very challenging to get these plots through the planning process.

Options to consider that other more progressive councils are using include the following examples

- **Tendring** – promotes aspirational or self-build homes to provide opportunities for larger properties of bespoke architectural design. Proposals for a single group of between two and six homes like this will be approved outside of settlement boundaries provided they are within 800m of the edge of an urban settlement, or 400m of the edge of a key rural service centre.
- **West Oxfordshire** – identifies locations where new housing will be encouraged through partnership working with local communities, landowners and self-build groups.

- **Cherwell** – purchased the former MOD site at Graven Hill and is now building the largest single private homebuilders’ development in the UK (1,900 homes)
- **Teignbridge** – on sites of more than 20 dwellings developers are asked to supply at least 5 per cent of the plots for sale to private homebuilders.
- **Shropshire** – has a well-established ‘Build your own Affordable Home’ scheme for single plot Exceptions Sites.

Question 3d - Should we allocate sites and/or make sure a percentage of housing developments are for self-build plots? Should we allow self-build plots on rural exception sites provided that they are affordable?

This plan needs to be bold and innovative and positively encourage self-build both for affordable and non-affordable schemes. We need to encourage self-builders who have been seen to promote design quality, diversity, environmental sustainability, entrepreneurialism and will also be driving innovation in building techniques.

Any future policy should include the following:

- Allocate unused or underused land for self-build projects
- Encourage self-build partnerships/community groups to come forward with small sites
- Allow affordable rural exception sites for rural workers who struggle to find affordable housing options close to work
- Allocate percentage requirements to sites over 10 houses so that developers are forced to offer self-build plots
- Loosen settlement requirements for self-build plots that are close to the edge of an urban settlement
- Set planning criteria separately for self-build plots to allow for the recognition of innovation/sustainability to be recognised more fully in the planning process.

Call for sites

As part of this commentary we propose the following site for consideration as part of the settlement/green wedge review.

- Land to the East of wild Oak Lane
- Previous planning application 42/17/0005
- Easting: 321696
- Northing: 122618

We would ask that an assessment of this site is performed specifically taking into consideration the following points

- The designation of the green wedge/space must be soundly based upon a formal detailed assessment of the contribution towards its aims and not simply on what is there at the present time.
- A robust review of the Vivary Green wedge designation looking at its consistency and strength along its edge needs to be carried out. At this particular point the green wedge comes up to the road. This does not provide any additional advantage to preventing coalescence nor does

it add to the openness qualities of the wedge as this area is surrounded on three sides by the road and existing buildings and gardens.

- This piece of land is in a separate privately owned field. It is not physically accessible to the community and therefore has limited ability to offer any special qualities to them that they can enjoy from a health point of view. Views of it are restricted and the visual and landscape report produced with the planning application stated that development would have only a limited and very local effect. The “openness” of the green wedge/green space therefore would not be diminished from it being excluded from these designations.
- Wild Oak Lane has houses on both sides. it is not a sporadic development pattern but has an established building line. This development would not increase the built development into open countryside to the East and it would most certainly not appear as an isolated development in the countryside.
- The future of the green wedge must be sound to ensure that it is protected well into the future. Infilling this site with one or two properties would actually strengthen the edge of the green wedge as it would prevent future access for development and therefore protect the designation into the future.

Yours sincerely

Helen and Nigel Fry



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