

From: [REDACTED]
To: [Strategy: Rhodes, Ann; Wilsher, Sarah](#)
Subject: Martin Wilsher - SWaT Local Plan 2040
Date: 16 March 2020 16:35:51

Dear All,

With reference to the above-mentioned item, please find below my general comments and observations on the contents of the document.

1) Absence of a strategy/purpose to underpin the approach of the local plan and provide a clear focus of what it is expected to achieve in spatial and land-use planning terms. There is a complete absence of reference to sustainable development which has been for 30+ years, and continues to be a key element of higher level policy advice (e.g. NPPF, NPPG). The document makes reference to two of the themes in the high-level priorities of the Corporate Strategy of the Local Authority (LA) but does not make clear how the local plan will fit into this.

Suggest that in further iterations of the local plan on its route to adoption, these relationships and linkages are identified in order to provide context and clarity.

2) The 'programme' for production of the local plan through to adoption - usually referred to as a Local Development Scheme (LDS) - is wildly optimistic and not remotely achievable in the timescale set out. Whilst work may have already been undertaken on various elements of data-gathering that will form the evidence-base to underpin the contents of the local plan, experience in the production of the various local plans that the new one is designed to replace should provide an indication of a more realistic time-frame.

Suggest the LDS is urgently reviewed and a revised timescale for delivery of an adopted plan is produced.

3) It is unclear as to what the geographic extent of the area covered by the proposed local plan is. Whilst a map is provided at the start of the Issues and Options document (p.3), it is not made clear until later (pp.10 and 19) that the plan does not cover the whole of the Local Authority area.

Suggest that an explanation as to the fact that there are two Local Planning Authorities (LPA's) in the SWaT LA area at the start of future document/iterations of the local plan in order to provide clarity to those unfamiliar with spatial planning and/or the local area.

4) Unclear as to the purpose of the Objectives (p.12) in relation to the local plan as many of these contain elements that the Local Plan, its strategy and, subsequent policies can seek to achieve. It must be noted and made clear that planning is very much an enabling process in the management and delivery of future development. It cannot, by itself, make things happen. It can only provide a policy framework in which future development initiatives and proposals can be considered and/or directed. This is particularly true of the contents of Objective 1 which is unrealistic and could not be achieved the application of planning policy.

Suggest the content Objectives are re-appraised and it is made clear as to how the spatial planning process, through the local plan, can help to achieve these.

5) Absence of an explanation as to how the development of the new nuclear power station

facility at Hinkley Point (HPC) is currently, and likely to continue to, affect the economy and development within the LA area. This is one of the largest construction projects in the South West region and, based on experience of similar projects in Finland and France by the same operator, this will continue for much of the proposed plan period. The final completion being unlikely to take place until c.2030 at the earliest. The project itself is currently employing c.4,500+ people on-site and this is proposed to increase to a minimum of 5,600+ at its peak and probably higher if the experience of delivery of other infrastructure projects in the UK (e.g. Channel Tunnel Rail Link, Heathrow Terminal 5) is anything to go by. This is, and will continue to, create a significant distortion in the local economy, especially in the construction and related sectors that will have an impact on the delivery of other development projects within the LA area and those proposed through the emerging local plan.

Suggest greater information and clarity is provided as to the spatial and land-use planning implications of the HPC project will have on the delivery of other development projects/initiatives that will be sought to be provided/enabled through the local plan process.

If the intention of the Local Plan 2040 and its (policy) contents is to replace the existing local Plans of the two former LA Districts (Taunton Deane and, West Somerset) in total, then either Policy NH10 of the West Somerset Local Plan to 2032 is 'saved' and retained when the new local plan is finally adopted or, a similar worded policy is included as part of the new local plan.

6) The new LA, SWaT is an amalgamation of two former LA Districts which have a number of characteristics that are common to both but also, a number that are completely different and need recognising and addressed where these are likely to impact of the communities at a more local level. The current document appears to have an in-built bias towards the Taunton and 'M.5 corridor' area at the expense of the more rural elements of the LPA area. Examples are;

In the former West Somerset, there is a disproportionately large element of the local population that this made up those who are over 65 (29.1% - 2011 Census) and, this is likely to continue to get larger in the foreseeable future, compared to the former Taunton Deane area. This has significant spatial implications for the provision of services and facilities to meet the needs of these people both now and in the future at the local level. Also, the former West Somerset area was characterised by having a much higher proportion of the resident workforce who were self-employed (27%+, 2011 Census) compared with its neighbour and one of the highest rates in England. Any attempt to apply a 'one-size-fits-all' policy approach within the new LPA area without recognising the implications of these differences is unlikely to be successful in all parts of plan area.

Suggest that the future strategy and planning policies recognise the different local conditions and characteristics that exist across the LPA area.

7) The document and the associated Topic Paper 1: Brief Assessment of Settlement Strategy Options, seeks to identify an appropriate 'settlement hierarchy' across the new LPA area in order to shape the future location of development during the plan period to 2040. It seeks to do this by combining the categories of settlements used in the previous LPA's respective local plans. However, the final settlement hierarchy identified involves too many tiers which can only lead to confusion amongst those unfamiliar with the land-use and spatial planning process. Also, the location of settlements within the hierarchy proposed appears to be determined more around the existing size of each, in population terms, and, their capacity as a potential location for future (primarily residential), development. This seems to ignore the actual role, function and, influence that individual settlements have on their communities and the surrounding area. Minehead performs a

much more significant spatial role as a centre for services and facilities than does Wellington, which lies within the sphere of influence of its larger neighbour to the north-east, Taunton. Also, the levels and ease of accessibility of the surrounding settlements of Wellington and Taunton by both private and public transport is much greater than that of the settlements around Minehead and the latter's relatively remote proximity to the County-town for higher order services and facilities. A more detailed appraisal of the settlements within the new LPA area is required possibly along the same lines as the West Somerset Towns and Village Centres Study much of the contents of which are still relevant despite the time that has lapsed since its original publication (2012).

In the context of the 'settlement hierarchy' as set out on p.17 and including the 'open countryside', I would suggest that the number of tiers be reduced to a maximum of five with clear identification of the role and function that the settlements in each tier are expected to perform;

- a) combine Wellington and Minehead into a single tier reflecting the important role, function and influence they have on their surrounding hinterlands both now and in the future.
- b) combine those settlements in the tiers, Minor Rural Centres and, Villages as these are essentially settlements with some, but not necessarily all, economic, social and, community services/facilities to meet the day-to-day needs of their respective communities and limit the level of future development to small-scale commensurate with their existing size.
- c) combine Other Smaller Settlements and Communities with 'open countryside' as a tier and restrict development to only that which is essential (e.g. rural workers dwelling) in those locations. Given the recent changes to 'Permitted Development' rights on the Development Management side of planning (e.g. barn conversions), there should still be potential for limited development to occur in these smaller settlements without the need for planning policies in the form of allocated sites and/or the identification of settlement boundaries.

8) It is unclear as to what level of provision of future 'Affordable Housing' is expected to be sought from future residential development applications as part of the overall proposal. In the former West Somerset LPA area it was identified in two separate Strategic Housing Market Assessment studies in 2008 and 2013 that there would be an on-going need for affordable housing in the area and that this would constitute 60%+ of the overall future housing need (50%+ of the overall need was projected to be for properties that were affordable at a 'social rent'). As a consequence of this and the associated Strategic Housing Land Viability studies (2008 and, 2014), it was determined that in most instances the former LPA could expect up to 35% of future development proposals for 11 or more dwellings to be affordable housing unless evidence could be provided as to how this might affect the viability of the project at the planning application stage. The former LPA was successful in negotiating this proportion of affordable housing from a number of development proposals around the time of the 'submission' of the West Somerset Local Plan to 2032 (in 2015) and subsequently (see Policy SC4: Affordable Housing). If it can be secured on relatively smaller-scale development proposals in a relatively remote rural location such as West Somerset, it should be possible on larger-scale developments around bigger settlements such as Taunton and Wellington, notwithstanding any other policy and other constraints that may apply on individual sites.

Suggest that a policy for the provision of affordable housing as an integral component of residential development proposals be drafted along the lines of Policy SC4 in the WSLP to 2032 and supported by the relevant documentation for its justification in the evidence-base to the Local Plan 2040.

9) Unclear as what would be achieved by developing a policy approach in the local plan concerning providing accessible and life-time homes as much of the requirements are effectively covered through other means in the development process (e.g. Building Regulations) which have greater influence and status than a policy can have.

10) Unclear as to what benefits the inclusion of a policy regarding the provision of self-build plots will effectively have. Planning permissions for individual dwellings provide a source of potential plots for this type of development.

11) Unclear as to what would be gained from 'taking' another LPA's housing requirement. If a future need for housing in the LPA has been determined within their area and there are no land availability issues within the LPA that prevent it being provided then it should be accommodated there. If existing communities are not allowed to evolve to meet the needs of their indigenous population then those places will, in the long-term, ossify and die.

12) Accept that planning has a role in supporting the evolution of the LPA's, and individual settlements/communities economies, where appropriate but it must be clear that this is essentially an enabling one. The LA needs to be clear as to what the current composition of its economy at the District level and lower levels within it. It needs to be clear as to its local strengths within the economy and their future prospects. It should avoid trying to compete with neighbours for the same inward investors if there is no real connection with existing industries and/or sectors within the LA area. Having aspirations about attracting/providing higher-value jobs will not by itself, make it happen. That can only occur if there are other incentives, outside of the spatial planning remit, in place to encourage either existing indigenous businesses to expand their operations or, attract new businesses to the area. Local plans, though the allocation of land for employment purposes, are only one element in a wider initiative.

Suggest that the LPA provides evidence of the stronger elements of its existing local economy and those with the potential to grow and develop policies that seek to facilitate and enable those businesses to evolve in the LPA area.

13) Local plan needs to accept that the role, function and, composition of town centres is undergoing significant change and this is most likely to result in their reduction in size and extent over the plan period. Need to identify within that context what elements of existing centres it may be necessary to accept that they will need to evolve to other uses including non-commercial (e.g. residential), and which elements which will form the 'core' of future town centre activity for the future. This may include an identification of what would be compatible alternative uses/activities and those locations that may benefit from future regeneration initiatives. However, the latter would need any relevant policies to be included in the local plan to be an integral part of a wider initiative with the appropriate economic/commercial incentives and not a stand-alone policy supporting an aspiration that is hoped will be picked up by the operation of local market forces.

14) The local plan through its evidence-base documentation needs to be clear as to what the future infrastructure needs of the area as a whole and locations/settlements within in it and, what can realistically be expected to be provided through other means especially that linked with development. It is currently unclear what the priorities within the LPA area are particularly in respect of transport and alternatives to the private car. Whilst there are aspirations for more environmentally-friendly modes of transport networks, this needs to be placed in the context of the LPA area as a whole and not just the larger urban centres. Also, there is a need to be clear as to what can realistically be provided and how.

Suggest studies to form part of the evidence-base as to future infrastructure requirements

for the main settlements (this used to be known as an Infrastructure Delivery Plan) and a realistic assessment as to what could be provided and how it might be funded/provided.

I accept that the above is more general than specific and may not tie-in well with the questions posed in the Local Plan 2040 document but, given the way the content of it is currently expressed there is a need for greater clarification and context as to how planning policy through the local plan process can actively contribute to the realisation of some of the aspirations and objectives. I could provide more detail on some of the above but that is likely to make for a very long document. However, if you require any further information and/or clarification of the points I have made, I can best be contacted via the return e-mail address. Best of luck with the evolution of the new Local Plan 2040.

Regards,

Martin Wilsher