

From: [Lois Partridge](#)
To: [Strategy](#)
Subject: MHPF - Representations to the Somerset West and Taunton Issues and Options Document consultation MHP2609 220108
Date: 16 March 2020 14:55:42
Attachments: [image521474.jpg](#)
[image790487.jpg](#)

Dear Sir/Madam,

Please find attached a letter in response to the current consultation on the Issues and Options Local Plan Document, on behalf of my client, MHPF (UK) Ltd, which owns land in West Somerset. We have also submitted nine Call for Sites forms on behalf of the client, on sites around Carhampton, Dunster Marsh and Old Cleeve.

I would be grateful if you would confirm safe and timely receipt of these representations. Please would you also confirm that you will notify me of any further developments in the Local Plan Making process.

Regards,

Lois

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We are already set up for video conferencing, Skype, and Microsoft Teams, and are therefore seeking to limit non-essential meetings (particularly those involving significant numbers of people) and will put in place appropriate precautionary measures for any meetings that are necessary.

Thank you for your forbearance.

The Sworders Team

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16th March 2020

Our ref: LP/AR/ MHPF2609 2200108 001 16 03 20



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Dear Sir/Madam,

RE: LOCAL PLAN 2040 ISSUES AND OPTIONS DOCUMENT

I write on behalf of my client, MHPF (UK) Ltd, which owns land in Somerset West and Taunton District. Nine sites have recently been submitted to the Somerset West and Taunton Call for Sites on behalf of MHPF (UK), for consideration for residential development; these sites are adjacent to the villages of Dunster Marsh, Carhampton and Old Cleeve. We welcome the opportunity to comment on the Local Plan 2040 Issues and Options Consultation Document ('the Plan').

Section 3 - Sustainable Locations - of the Plan identifies the Council's proposed settlement hierarchy. Carhampton is identified as a Minor Rural Centre, and Dunster Marsh is identified as a Tier 6 village. We support the proposed hierarchy of these settlements. Old Cleeve is identified as a Tier 7 settlement, 'other smaller settlements and communities'.

We also note that the Plan states on page 18 that:

'The position of settlements in the lower tiers (particularly Tiers 4-7) may change following further work on the role and function of settlements'.

We welcome the intention to review the settlement hierarchy for the smaller settlements, and encourage the Councils to recognise the contribution smaller settlements can make to providing sites for residential development, particularly the case in light of the historic under delivery of homes described in the Plan in Minehead, Watchet and Williton.

Currently the adopted Local Plans focus the majority of development in the urban areas (Taunton, Wellington and Minehead), with only 1.8% of the planned growth in Minor Rural Centres and 2.4% in the villages. This focus on the urban areas has had a significant impact on the capacity of local infrastructure and services in urban areas.



Through the above review, we would encourage the Councils to re-balance the location of growth to allocate more sites on the edge of small villages which have limited facilities, and to provide a criteria based policy which allows for small scale development in very small settlements. Such development can help to encourage vitality and viability of communities, and is possible due to broadband provision and home working.

Paragraph 78 of the NPPF states that:

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning opportunities should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'

We therefore urge the Councils to review the potential for minor rural centres, villages and smaller settlements as suitable locations to accommodate small scale growth which is appropriate to the scale of the existing settlements, and to the existing road and public transport infrastructure.

Topic Paper 1 considered eight alternative spatial strategy options for development. We support Option G 'Rural Areas Lead for Growth'. This options scores -8 when compared against local plan review draft objectives in the Topic Paper, but this is because it relies on the conventional approach to sustainability, and thought has not been given to the potential contribution new development could make to improve infrastructure and facilities in rural areas, which would then improve the Sustainability Appraisal score.

For instance, Option G is given a score of -1 for the criterion *'to provide a sufficient and varied supply of high-quality homes to meet the needs of all sections of or communities.'* However, a development of twenty or thirty homes adjacent to a village such as Carhampton could provide a mixed development of market and affordable housing, and even some self build or custom build housing which would meet the needs of a wide range of the population.

Significant weight should also be given to the potential for such rural development to make proportional contributions to improvements to existing infrastructure, and to the provision of new and improved shops, services and facilities which would benefit both new and existing residents.

Paragraph 5.3.1 of the Plan notes that the Government's Standard Methodology calculates the Authorities' housing need as 702 dwellings per annum. However, as noted in the Plan, this is a minimum figure, and may need to increase to support an economic growth strategy, strategic infrastructure improvements, or to deliver an element of unmet housing need from Exmoor National Park.



Paragraph 6.29 of the adopted Exmoor National Park Local Plan 2011-2031 states that the objectively assessed housing need is 541 units 2011-2031, and that 238 of these units should be provided for in the West Somerset area, outside the National Park. It is not clear from the adopted West Somerset Local Plan whether an element of the current housing requirement of 2,900 homes to 2032 is comprised of unmet need from Exmoor National Park, but as the new Plan covers the period to 2040, further provision will in any case need to be made in the new Plan, to cover the extended Plan period.

The additional units should be provided for in villages close to the National Park, to meet local need. Villages such as Carhampton and Dunster Marsh are perfectly situated to accommodate this development.

Finally, we note the proposals in paragraph 5.12 for Policies for our Places; The Coastal Strip, which proposes supporting new employment sites and job generating activities in the key towns. We support the proposed policy, and suggest that alongside the planned economic growth, plans should be made for improved infrastructure in the local area and for new homes in villages such as Dunster Marsh, Carhampton and Old Cleeve to support such growth.

In summary, my client's land interests lie adjacent to the villages of Carhampton, Dunster Marsh and Old Cleeve, and nine submissions have been made to the current Call for Sites on their land.

Development has historically and recently been focused in around the main urban areas in Somerset West and Taunton, which has had significant impacts on infrastructure, services and facilities in these areas. The new Plan provides the opportunity to slightly redress this balance by allocating small parcels of land adjacent to villages which have shops and services, and also by looking to allocate sites where these could contribute to improving local shops, services, facilities and infrastructure. An example of this would be sites around Dunster Marsh, Carhampton and Old Cleeve.

I would be grateful if you would confirm safe and timely receipt of these representations. We would be happy to discuss the potential of the sites we have nominated for consideration by the Councils with you, and to provide further information as necessary.

Regards,



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