

**From:** [Simon Collier](#)  
**To:** [Strategy](#)  
**Cc:** [Littlewood, Gill](#)  
**Subject:** Mitchell Partners  
**Date:** 16 March 2020 10:26:06  
**Attachments:** [image002.png](#)

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Dear Sir/Madam

Please find attached representations on behalf of Mitchell Partners.

These are being emailed to you as we have not been able to submit comments online due to the maximum word limit and as we are including plans.

Please acknowledge safe receipt by return of email.

Yours faithfully,



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**Somerset West and Taunton Local Plan 2040 (Issues and Options Consultation Document)**

**March 2020**

**REPRESENTATIONS ON BEHALF OF MITCHELL PARTNERS**

Carbon Neutrality

*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?*

While the objective of seeking to achieve carbon neutrality is fully supported, it is important that the Council identifies and establishes the potential impacts of any proposed policy measures on the deliverability of development. We recommend that the Council produces evidence that can be consulted on which seeks to test the impacts of such a policy on the viability of development. This would help to inform a decision on when such requirements should come into force and what other measures (e.g. reduction in CIL) might need to be considered in order to help the development industry to achieve such policy goals without impacting negatively on the deliverability of projects.

The Government has recently held a consultation on The Future Homes Standard. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. Any measures required by the Local Plan should be consistent with emerging national policy on this matter.

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

No comment at this stage.

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

1c/1 See 1a above.

1c/2 See 1a above.

1c/3 – 1c/7 No comments at this stage.

### Settlement Tiers

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

Taunton, as significantly the largest and most sustainable settlement, should clearly remain as the principal area of growth within the plan area but a mix and range of sites for housing is needed in order to maintain a robust supply over the plan period.

An over-reliance on large strategic sites over the current plan period has led to the Core Strategy delivery targets not being met in Taunton and we would therefore advocate the need for a more mixed range of site sizes and types in different areas and suitable for a range of different types of housebuilders and developers, as is encouraged within the NPPF. This would also better allow for the full range of housing – including affordable, private rental, homes for older people, specialist housing, executive housing and self-build - that is required to be provided, rather than a supply largely of similar forms and types of housing. The NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. The NPPF requires Local Plans to demonstrate that 10% of the housing requirement will come from sites of less than 1ha unless there are strong reasons why this cannot be achieved. Such sites could be delivered in smaller settlements. These sites tend to be those currently outside of settlement limits and would require amendments to current settlement boundaries or the introduction of a policy which would enable suitable sites adjacent to settlement limits to come forward

The plan making process is the appropriate time to consider how Taunton's highway infrastructure may need to be improved to better accommodate the required growth of the town. This was not properly addressed for the current plan period within the Core Strategy and should be an important element of the new plan. All options for doing so should be explored and tested as it is unrealistic to expect the major shift in travel behavior to public

transport that the Core Strategy was reliant upon. The economy of the town will suffer without a robust strategy for improving the town's highway network.

It is important that the villages are allowed appropriately commensurate growth but that sufficient land is identified in Taunton and Wellington to maintain a constant supply so that undue pressure is not placed on the villages in that regard.

*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 at this stage.

#### Distribution of housing

*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?*

No comments at this stage.

*Question 2d/1-4: Do you have any comments on these policy approaches?*

No comments at this stage.

#### The right number of homes

*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?*

We support a higher figure than the Government's minimum figure for a variety of reasons.

Firstly, the household projections upon which the Government's minimum figure (derived from the standard methodology) is based are not fit for purpose. They rely on past trends which are imbued with suppression of household formation, to predict future needs whereas, in reality, there is an increased demand for housing driven by long term trends in the average household size, which is getting progressively smaller. This is itself driven by a range of mostly social and health factors.

The long-term trend in increased household formation has been stifled over the last few decades because of a lack of new housing. This is a clear finding arising from the study of objectively assessed housing needs. This suppression of household formation is most starkly evident in the 25-34 age group (first time buyers) but is becoming increasingly evident in the 35-44 age group as the average age of first time buyers has shot up to nearly 40. These groups have suffered from escalating house prices for at least the last three decades and that has been driven by one key factor - a lack of new housing throughout that period, causing demand to outstrip supply.

In the 1960's and 1970's supply matched demand and home ownership was a realistic prospect for nearly everyone because prices were affordable. This suggests that the persistent social and health trends have long required that we build around 300,000 new homes a year nationally, the figure the Government now suggest. The last time this was achieved was 1969. The household projections do not address this huge scale of past under supply and the consequence is the national "*housing crisis*".

The household projections which project forward past trends have, for several decades now, been projecting forward trends in suppressed household formation. Rather than projecting forward the long-term trend in household formation from the 1970's as the MHCLG (previously the DCLG) did, the 2016-based household projections were based for the first time on only the period between the 2001 and 2011 national census, by which time the trends in household formation had well and truly stagnated.

In the new Plan area, and taking the Council's own figures from its SHLAA reports, annual housing completions have only met the standard method figure of 702 in five of the last nineteen monitoring years. Through most of this period the housing requirements for the

area set out within the relevant Structure Plans and more recently Local Plans have been higher than this figure. It is clear therefore that the delivery of housing has generally been constrained, reflecting the national picture. This would be exacerbated if the standard method is adopted by the new Local Plan which would clearly not help to address the housing crisis, and its causes, which it is universally accepted we are in.

The formation of the new Council and the fact that the new Plan area will combine two former plan areas, in our view provides the exceptional circumstances referred to in the NPPF justifying an alternative approach to the standard method and one that also reflects current and future demographic trends and market signals.

Other reasons justifying an alternative approach include:

- the need for a significant boost to the local economy to respond to the issues identified in the consultation paper, including a current reliance on public sector jobs, lack of recent investment from the private sector and economic growth not keeping up with nearby towns;
- the lack of strategic infrastructure, including highway infrastructure, delivered through the current plan period needs to be addressed and will require a reasonable scale of new development to help do so; and,
- the inevitable consequences of lower housing requirements on the delivery of affordable housing.

The new local plan should identify a direction of growth with a view to delivery in future plan periods. A lesson to be learnt from the current plan period is that it can take broadly an entire plan period for large urban extensions to come forward and so work should be undertaken now to plan for the next one, whether it is needed towards the end of this plan period or the next.

In order to best ensure that the new Plan will seek to address the actual housing need within the plan areas, we therefore advocate further assessment of housing need and for the Plan's housing requirement to be informed by such assessment rather than the flawed Standard Method.

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

We consider it that an appropriate approach would be a combination of applying rural exceptions criteria for small scale sites and allocating sites specifically for pitches. We would not support requiring a proportion of development sites to provide an area for Traveller pitches as such an approach has created significant problems in Mid Devon, for example.

### Accessible and lifetime homes

*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?*

Not all development sites would be suitable for such provision due to a range of potential factors including location, other constraints, scheme viability, etc. Having a blanket approach is not sensible and so any policy would have to be appropriately informed by evidence of viability and flexible enough to only apply in certain defined circumstances.

### Custom self-build plots

*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?*

The identification of specific land for self-build plots would be more appropriate than including a requirement for housing developments to include such plots. A policy allowing such housing as an exception to normal policies should also be considered, as has recently been adopted by Sedgemoor District Council, for example.

3e/1 - 3e/7

No comments at this stage.

## Economic Growth

*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?*

The consultation paper identifies a current reliance on public sector jobs, a lack of recent investment from the private sector and economic growth in Taunton not keeping up with nearby towns.

We support the option of delivering a shift towards a significant increase in overall job numbers, including higher value jobs. The alternative is likely to result in the local economy stagnating and business investment in the area continuing to go elsewhere.

## Better use of employment sites

*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?*

Employment sites identified in the current plans should be reviewed, as is required by the NPPF, so that those that are kept are done so because they remain appropriate and those that are not appropriate can be considered for alternative uses. This process should consider the need for new sites as well in order to drive the economic growth strategy.

## Vitality of town centres

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

No comments at this stage.

## Priorities of developer contributions

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

See below. However, we suggest an appropriate balance should be struck between seeking to meet the delivery of affordable housing, infrastructure requirements and sustainability/design objectives. Development has to be deliverable and policy requirements therefore need to be realistic in terms of what can be achieved.

*Question 5b/1- 5b/4: Do you have any comments on these policy approaches?*

The NPPF's requirement for development viability to be addressed at the plan-making stage means that it is vital that the Council's evidence underpinning the Plan is comprehensive and robust. It will need to consider and assess a comprehensive range of development and site types and sizes in order that the policy measures that arise from it take into account the full suite of different scenarios that might apply. This will be a particularly important part of the evidence base and we recommend that its preparation should involve a broad range of interests from within the development industry.

## Travel behaviour

*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?*

Naturally, we support the objective of seeking to reduce car-use. However, we strongly believe that it is unrealistic to expect the extent of travel mode shift change that has underpinned the current Plan's strategy. It is only in the very large conurbations that this is achievable and so within the Plan area, even Taunton, some pragmatism is required. A strategy that ignores the requirements of the car would be significantly flawed in our view. The local economy and social well-being of the local community would be bound to suffer the consequences of such an approach. Consequently, we strongly encourage the Council to make transport infrastructure a key component of the Plan's strategy for the new Plan and for this to incorporate more realistic expectations for achieving modal change.

*Question 6b1-6b/5: Do you have any comments on these policy approaches?*

No comments at this stage.

#### Net gain in biodiversity

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

The Plan's strategy for development requirements for biodiversity net gain should be factored into the viability assessment work we refer to in our answer to question 5b.

#### Natural and historic environment

*Question 7b1-12: Do you have any comments on these policy approaches?*

We would encourage the Council to robustly review all parcels of land that fall on the edges of its Green Wedges to assess whether it is appropriate or necessary for them continue to fall within these designations. There are a number of instances where land has been included within such designations despite making very little or no contribution towards the objectives of them. This results in land which is suitable for development being blighted unnecessarily and constraining the supply of land which can contribute towards maintaining an appropriate supply of development land. Potential for site allocations, infill, rounding off and other small scale site opportunities should be fully explored on this basis.

#### Development in rural settlements

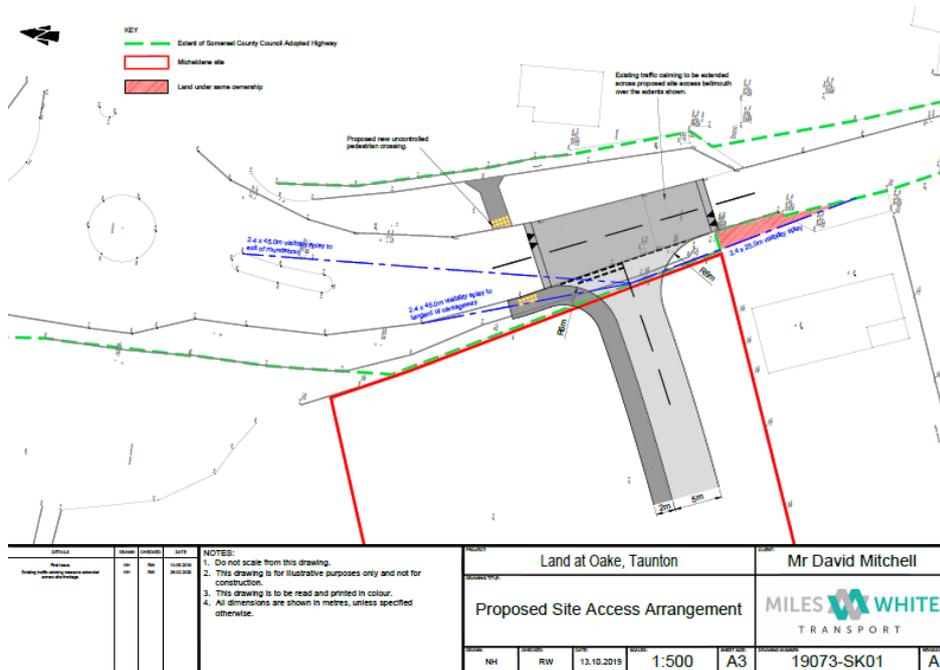
*Question 8a: Should we keep or remove settlement boundaries? Or should we have settlement boundaries in areas where there is higher pressure from development i.e. closer to Taunton, Wellington and Wiveliscombe but remove them in more remote areas to provide more options for development?*

We would support the removal of settlement boundaries in smaller settlements, to be replaced by criteria based policies.

Mitchell Partners own land adjoining the current settlement boundaries of Oake and Bradford on Tone. The land at Oake is shown edged red on the plan below.



The land, which is available for development, is well located to the existing built form of the village within close proximity of bus stops, community shop and village hall and the primary school. Housing development of a scale commensurate with the role and function of the village could be delivered on part of the site. Such a proposal could include affordable housing and other tangible community benefits including a parking area for users of the school to help relieve the congestion at the main school entrance and address issues raised during discussions with the village school and in the recent Parish Community Needs Survey; new pedestrian footways linking the northern part of the village to the school and a play area for the school on land adjoining the school the need for which has been identified by the school. Access to the site could be provided from Bradford Road in a manner identified on the plan below.



The land at Bradford on Tone is shown edged red on the plan below.



The land, which is available for development, is also well located to the existing built form of the village. Housing development of a scale commensurate with the role and function of the village could be delivered on part of the site. Such a proposal could include affordable

housing and other tangible community benefits including public open space and an equipped play area, the need for which has been identified by the Parish Council.

*Question 8b/1- 8b/2:*

We would be generally supportive of these policy approaches in principle.

*8b/3-8b/7*

No comments at this stage.

#### Design

*Question 9a/1-7:*

No comments at this stage other than to say in respect of 9a/3, this will require a flexible approach to be taken by Somerset County Council highways in order to be achievable.

#### Key issues for Taunton

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

No comments at this stage.

*Question 10b/1 – 10*

No comments at this stage

#### **Key issues for Wellington**

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

Mitchell Partners own land adjoining the current settlement boundaries of Wellington at Westford.



The land, which is available for development, is well located to the existing built form of Westford. Housing development could be delivered on part of the site. Such a proposal could include affordable housing and other tangible community benefits including public open space.

**Key issues for the coastal strip**

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

*No comments at this stage.*