

From: rebecca.randall
To: [Strategy](#)
Subject: White Young Green - Brushford Site - Local Plan 2040 & Call for Sites - Land north of Ellersdown Lane, Brushford
Date: 16 March 2020 12:11:05

Good Afternoon,

On behalf of our client Mr and Mrs Summers, WYG would like to formally submit following for your consideration:

- Covering Letter
- Consultation Representations to the Issues and Options Document
- Completed Call for Sites Form
- Site Boundary Plan

If you have any queries regarding this email please do not hesitate to contact me. We look forward to being consulted further as the plan preparation process continues.

Kind regards,

Rebecca Randall
Principal Planner

WYG

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Our Ref: A117120

Somerset West and Taunton Council
The Deane House
Belvedere Road
Taunton
TA1 1HE

16th March 2020

Dear Sir/Madam

SWT LOCAL PLAN 2040 FORMAL REPRESENTATIONS AND CALL FOR SITES: LAND TO THE NORTH OF ELLERSDOWN LANE, BRUSHFORD

On behalf of our client, Mr and Mrs Summers, WYG are pleased to submit the following in connection with the above:

- Issues and Options Consultation Representations
- Completed Call for Sites Form
- Site Location Plan

We trust that the comments and information provided will be considered carefully as the Local Plan 2040 is progressed and we look forward to being consulted on the next stages of the plan preparation.

In the meantime, should you have any queries or wish to discuss the contents of our submission at any stage, please do not hesitate to contact me.

Yours faithfully



Rebecca Randall
Principal Planner

For and on behalf of WYG Environment Planning Transport Limited



A117120
SOMERSET WEST AND TAUNTON LOCAL PLAN 2040
ISSUES AND OPTIONS CONSULTATION REPRESENTATIONS ON BEHALF OF MR & MRS
SUMMERS
16th MARCH 2020

Introduction

WYG has been instructed by Mr and Mrs Summers to prepare representations in connection with the above. Mr and Mrs Summers are the landowners of Land to the north of Ellersdown Lane for which a Call for Sites Form has also been submitted.

We set out the topics and questions from the Issues and Options consultation in bold/bold italics with our responses in normal type.

Section 4: Objectives

Objectives question: Do you agree that these are the right Objectives for the Local Plan?

We offer the following comments in respect of the proposed objectives contained within the consultation document:

- Objective 1 – whatever standards/measures are adopted in respect of achieving zero carbon within new developments, these need to be pragmatic and flexible with clear guidance provided as to how these are to be assessed and evidenced.
- Objective 2 – given the rural context of the area, we suggest that the proposed objective to strengthen the function, vitality and self-containment of towns should be extended to the villages as well. This is very relevant with a significantly higher than average aging population (particularly in West Somerset where 50.8% are over 65 years) and given the potentially limited capacity of the rural transport network.
- Objective 5 – The delivery and funding of required infrastructure needs to be clear and achievable, having regard to NPPF paragraphs 16b, 20b, 34 and 35.
- Objective 6 – Linked to proposed objective 2, there needs to be recognition of the challenges of achieving this in a predominantly rural district and the specific needs of the existing and projected



population demographics. Clearly the need to reduce travel by private car is sensible one under the current climate change emergency, however consideration and balance needs to be given to the achievability of a major shift in travel behaviour given the rural and widespread nature of settlements. With this in mind, further consideration needs to be given to the most appropriate options available in a predominantly rural area in terms of encouraging sustainable travel patterns.

Section 5: Issues and options

5.1 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 an important issue and aspiration, achieving zero carbon for all new developments is a challenging target with no single or quick solution. Achieving this in itself is not a silver bullet to address the emerging climate change agenda and may result in other indirect social challenges in respect of rural affordability for example which is an issue raised in SWT's consultation document.

Where policies are introduced to require all new developments to be zero carbon, careful consideration needs to be given to the deliverability of such measures, impacts on viability and how these may be balanced with other environmental, economic and social considerations. Such policies will need to be prepared positively, in a way that is aspirational but deliverable (NPPF, paragraph 16) with a degree of pragmatism and flexibility so as not to unduly burden or stifle development coming forward in a timely manner.

Enough time needs to be provided for developers to consider which measure(s) would be appropriate for their operation and product, and where this involves new technology and materials, there needs to be sufficient lead in time for these to be designed and produced. This is particularly true for small and medium size builders which should provide an important contribution to overall housing supply (NPPF paragraph 68). Based on this, and the time period associated with Local Plan preparation, we consider that a timescale of 2025 is not realistic and would likely stifle housing delivery in the short term.

We would therefore advocate the longer timescale of 2030 (although it is considered that even this timescale may not be long enough) to enable the development industry to consider and implement appropriate measures and for the supply chain to respond. In our view, it is essential that developers are



fully engaged in developing the policy framework to achieve zero carbon through a dedicated forum and ensure that policies are meaningful and implementable in the longer term.

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

With respect to proposed policy 1c/2 the provision of electric vehicle charging to all new residential parking spaces is achievable for private/individual spaces but can be more difficult on communal spaces due to management and maintenance arrangements. Any requirement therefore needs to be flexible for those cases where it is not feasible.

It is not clear whether the provisions of 1c/7 (good waste and recycling provision) are best placed within the Local Plan. Such a policy would not be a strategic one, and in line with NPPF paragraph 28, non-strategic policies should be used by authorities to set out more detailed policies for specific areas, neighbourhoods or types of development. We would not support a blanket or ambiguous policy requirement which would impact upon deliverability or other design measures.

5.2 Sustainable locations

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?

The consultation document refers to the lower tiers potentially changing following further work on the role and function of settlements looking at population, public transport, travel time/carbon emissions, facilities, jobs and development constraints. Consideration also needs to be given to the relative proximity of smaller settlements to the facilities of larger nearby settlements, for example Brushford is closely associated with Dulverton.

We are concerned that 30 villages are listed within proposed Tier 6 and that there is likely to be significant disparity between how settlements are scored in terms of sustainability and opportunity for growth when the role and function assessment is carried out. Brushford, for example, has a material different offer in terms of population and services than that of Brompton Ralph or Halse. The following solutions may be identified through future Local Plan iterations:

- Some larger settlements currently identified in Tier 6 are moved to Tier 5.
- An additional "larger villages" tier is introduced between Tier 5 and 6 allowing for appropriate growth outside of settlement boundaries.



- Tiers 1-4 are re-organised and reduced in number, with specific place-making policies introduced to establish appropriate growth levels and objectives for these areas.

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

With respect to proposed policy 2b/1, location should not be a factor as this will be addressed through the settlement hierarchy. If a town or village is listed in one of the higher tiers, then its location must be considered sustainable and this should not be open to challenge as part of any future application. Further while measures to reduce travelling and car dependency are important, it must be recognised that within the SWT area there will always be an element of private car use. There needs to be a sensible balance struck between reducing travel/improving non car usage and delivering development where it is in demand.

5.3 New and affordable 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?

The standard methodology sets a baseline minimum housing requirement based upon past trends from the Office of National Statistics, but it does not take into account a number of factors that might require a higher housing requirement.

These factors include, but are not limited to, the following:

- Delivery of 702 homes per annum may not deliver sufficient affordable homes to meet the needs of the authority or any backlog of provision. The majority of affordable housing is delivered as a percentage requirement from the overall housing requirement (currently 25% in Taunton Deane and 35% in West Somerset under the existing adopted Development Plans). By lowering the annual housing requirement, affordable housing delivery in the area will also be reduced compared to the current rate. This approach would not deliver upon proposed objective 3 or the significant existing affordability issues experienced in the area and set out on page 11 of SWT's consultation document.
- Objective 4 refers to "attracting the most talented workers to the District". Section 5.4 refers to economic growth ambitions and an increase the proportion of higher value jobs. These initiatives are welcomed, however they will no doubt require a shift in population past trends that the standard methodology does not account for. Put simply, attracting more talented workers to the district will



require higher migration rates than the district has historically seen. This will in turn require additional housing over and above maintaining past housing trends that the standard methodology relies upon. This is often referred to as an economic-led housing requirement.

- The standard methodology does not take into account strategic infrastructure improvements required to meet the minimum housing requirement or, for example, carbon neutrality. A shift towards increased use of public transport will require significant investment in the current system. A significant proportion of this funding will come from new homes, however an increase in homes may be required for this to be viable.
- Local housing need assessments may cover more than one area or district. There may be an unmet need in adjacent Districts that serve the SWT housing market area. For example, the North Devon and Torridge Joint Local Plan includes an additional housing requirement to facilitate unmet housing need in Exmoor. There is likely to be a similar requirement for SWT that under the Duty to Co-operate (NPPF paragraphs 24-27, 60) SWT is obliged to investigate and whether its housing requirement meets such a need.

The above examples (and other scenarios) are likely to require an additional housing requirement over and above the standard methodology. The Local Plan Review would not be 'sound' if it did not investigate these additional housing needs through an Objectively Assessed Housing (OAN) need and an appropriate evidence base. In our view, the limited evidence provided to date indicates that the standard methodology cannot therefore be relied upon to significantly boost the supply of housing or to demonstrate a sufficient and varied supply of housing.

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

We do not support option ii because in our view, requiring a proportion of development sites to provide an area for gypsy and traveller pitches does not recognise the inherent challenges of co-locating more traditional housing with the specific cultural and physical requirements of the gypsy and traveller community. Lenders will also not provide mortgages where gypsy and traveller sites are mixed in with open market sites. Such sites should therefore be positively planned for, either through a supportive criteria-based policy (option i) or through site allocations (option iii).



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?

Clarity is needed over which category of Part M will be required as there are significant cost and space implications between category 3 accessible and adaptable dwellings and category 4 wheelchair use dwellings. The overall percentage requirement (usually 5%) and the threshold for when this will apply (usually major developments) needs to be clear and reasonable, reflecting an evidence-based need for such accommodation. Policy requirements should also not seek to duplicate or over-ride building regulations.

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 consider that option iii is not practical as requiring a proportion of development sites to provide an area for custom and self-build causes difficulties for developers in planning their sites given the uncertainty over when and how these plots will be delivered. Further, such an approach is unlikely to genuinely meet the identified need, which should be evidenced by the self-build register. We would encourage SWT to discuss such an approach with authorities where similar policies have been implemented so that the challenges are understood.

People who have expressed an interest in self and custom build are unlikely to be attracted to a site that forms part of a larger more traditional housing development. Such sites are much better being market led (options i and iv) or being separate allocations on sites that are specifically suited to meet this particular need (option ii). With this in mind, we support all options except option iii.

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

With respect to proposed policy 3e/2, we assume this is referring to the need for a viability assessment where a lower than policy compliant level of affordable housing is being proposed (whatever that policy requirement may be), rather than the affordable requirement for each site being established via a viability appraisal. If the former this is supported, but in any event the policy wording needs to be clarified. If the latter, we would strongly object to this as being inconsistent with NPPF Section 5 which requires affordable housing need to be assessed and addressed within specific and unambiguous development plan policies.



Likewise in relation to 3e/3, affordable tenures should be evidenced and addressed within development plan policies in order to achieve proposed objective 2 and accord with NPPF Section 5.

We will strongly oppose the imposition of a housing size mix for open market units where such requirements are not robustly evidenced. It is not correct to rely upon demographic projections to make assumptions on the size of houses that are needed or will be taken up across the area because this is led by the market not generally by an individual's accommodation needs. With this in mind, we consider that development plan policies to address the significant affordability issues in the district are considered in preference to arbitrary standards for house sizes.

With respect to proposed policy 3e/6, any blanket imposition of standards without flexibility risks preventing or discouraging some forms of development. There may be cases where space standards cannot be complied with, but the development still has adequate amenity and is desirable, one example being the retention through conversion of a designated heritage asset. Therefore, any policy requiring specific standards need to be discretionary where a departure from the policy requirement can be justified.

5.4 A prosperous economy

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

With respect to proposed policy 4c/4 and the requirement for home offices in new dwellings, to be effective there needs to be sufficient lead in time for developers to incorporate this into their standard house types and the threshold and percentage requirement needs to be based on evidenced demand.

Where there is an evidenced demand for home offices and these are accommodated within a development proposal, there should be active policy support for such circumstances so that this benefit and its impact in terms of meeting proposed objectives 1 and 6.

5.5 Infrastructure

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

This is not an appropriate matter to be raised within the issues and options consultation where the identified housing requirement and assessment (refer back to our comments made in response to question 3a) and viability testing has not been undertaken. Until such time as this evidence has been prepared and consulted upon, any responses received are not in our view in any way informed.



Any assumptions made about the relative costs of providing the different infrastructure elements that are listed in the consultation document must be informed by a robust evidence base. There also needs to be an assessment of the direct and indirect benefits the different elements provide – for example affordable housing not only meets that specific need but it also provides for balanced and mixed communities and in terms of site delivery provides early phase income.

A single blanket approach to infrastructure prioritisation may also not be appropriate as certain locations/types of development will have different pressures and needs, which in turn will be established through the evidence base.

5.6 Connecting people

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?

Given the extensive amount of rural settlements across the SWT area which positively contributes to the overall character and role and function of the whole District, self-containment and/or clustering of rural settlements with a focus on delivering appropriate levels of growth to sustain rural vitality would seem to be an appropriate means of encouraging people to reduce reliance on the car.

Increased opportunities for using public transport can only be achieved with the support of the infrastructure providers.

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

We generally support the proposed policy measures set out within 6b/1 – 6b/5 although significant investigation would be required to secure S106 contributions in relation to improved bus services to ensure that the relevant tests are met with NPPF paragraph 56.

Securing the measures set out within a development should be granted significant weight within the policy in terms of contributing towards both proposed objectives 1 and 6.



5.7 The natural and historic environment

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

With respect to proposed policy 7b/1, clarity is needed as to whether this will be applied to commercial/non-residential developments. If so, we would object to the use of the Somerset Habitat Evaluation Procedure (SHEP) as the method of assessing biodiversity net gain (BNG) instead of the DEFRA Biodiversity Metric 2.0 (or any subsequent version). The idea with the DEFRA BNG Metric was to create a standardised approach to measure biodiversity across the country. Within DEFRA's consultation document on BNG there is recognition that "several major developers and planning authorities already set specific biodiversity net gain requirements" but that "a standardised requirement for biodiversity net gain, applied equally to all development within scope, could create a level playing-field for developers". Imposing different/local assessment methods which have not been evidenced or justified would not achieve this aim and will lead to uncertainty for developers. Reference should also be made in the policy to biodiversity offsetting/the purchase of biodiversity credits, both of which are specifically addressed in the DEFRA consultation document and draft Environment Bill.

5.8 Thriving coastal and rural 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 would advocate option ii whereby there are no boundaries but a sensible list of criteria against which proposals can be considered. It may be useful for these criteria to reference/be framed around the Building for Life principles.

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

In respect of 8b/1 this will need to include Rural Exception sites and allow an element of open market cross subsidy in line with the approach within NPPF paragraphs 77 and 78. Consideration should also be given to allowing the following outside of settlement boundaries given the clear support within the NPPF:

- Self-build
- Starter homes / First Homes



- Open market dwellings that demonstrate exceptional quality design (NPPF paragraph 79)
- Reuse and/or conversion of existing buildings



Office use

STRATEGIC HOUSING & EMPLOYMENT LAND AVAILABILITY ASSESSMENTS -
SITE SUBMISSION FORM

Somerset West and Taunton Council review their Strategic Housing Land Availability Assessments (SHLAA) annually and their Employment Land Reviews periodically. This form should identify sites which will be considered by the Councils for their suitability for housing and/or employment for the period to 2032. Brownfield sites submitted may also be included in future brownfield registers.

Please use a separate form for each site and complete the form to the best of your knowledge.

Please include a 1:1250 or 1:2500 ordnance survey map showing the exact site location and boundary, otherwise the form will be returned to sender.

Sites submitted to Somerset West and Taunton Council through this process will be in the public domain and the information submitted will not be treated as confidential.

Contact Information	Your Details	Agent Details (if applicable)
Where provided, we will use your Agent's details as our primary contact		
Name:	Mr & Mrs Summers	Rebecca Randall
Position:	Landowner	Principal Planner
Organisation:		WYG
Address:		Hawkridge House Chelston Business Park Wellington TA21 8YA
Phone:		01823 666150
Email:		planning.wellington@wyg.com

1. Site Information

Site address: Land to the north of Ellersdown Lane, Brushford

OS Grid reference: E292327 / N125965

Site area: 1.9 hectares

What is your interest in the land? (e.g. landowner, potential developer)

Landowner

2. Site Description

Previous use: Agricultural

Existing use: Agricultural

Is the site considered to be: Brownfield

Greenfield

Proposed use:

Industrial	<input type="checkbox"/>
Space Offices	<input type="checkbox"/>
Leisure (built form)	<input type="checkbox"/>
Retail	<input type="checkbox"/>

Open	<input type="checkbox"/>
Residential	<input checked="" type="checkbox"/>
Gypsy & Traveller	<input type="checkbox"/>
Self or Custom Build	<input type="checkbox"/>

Site description, including any relevant planning history:

Existing agricultural land situation adjacent to the existing built up area with provision for access by virtue of full planning permission for residential development granted in June 2019 (3/04/17/016) within the south west corner of the site.

3. Timescales

When will the site be available to commence development?

0-5 yrs	<input checked="" type="checkbox"/>	6-10 yrs	<input type="checkbox"/>
11-15 yrs	<input type="checkbox"/>	16-20 yrs	<input type="checkbox"/>

Likely timeframe (in years) for completion once commenced: 3-5 years

4. Site Details

Access to an adopted highway (*please describe*): Available via the consented residential scheme at Ellersdown Lane ref (3/04/17/016)

Vegetation on the site (e.g. trees, hedgerows): arable crops, bounded by hedgerows on part of southern and eastern boundaries.

Hydrological features (e.g. streams, watercourses): None

Other on-site features (e.g. particular landscape features, existing buildings, etc.) No.

Are you aware if there are any site contamination issues? Yes No

If yes, please give details:

5. Site Accessibility

Within which settlement is the site located? Brushford

If the site is in a more rural location, name the nearest settlement:

Is the settlement served by public transport? Yes No

If yes, how frequent is this service? (Variations on routes via Brushford shown individually)

- Bus Service 25 Dulverton - Taunton (Mon -Fri 5 trips, Sat 4 trips, Mon-Sat eves 1 trip)
- Bus Service 25 Taunton - Dulverton (Mon - Fri early am 1 trip, Mon - Fri 1 trip, Mon-Sat 5 trips)
- Bus Service 198 Brushford - Minehead (Mon -Sat 1 trip, Mon - Sat 1 trip)
- Bus Service 198 Minehead - Brushford (Mon - Sat 1 trip, Mon - Sat 2 trips)
- Bus Service 398 Dulverton - Tiverton (Mon - Sat 1 trip, school service am only 1 trip, Mon - Sat 1 trip)
- Bus Service 398 Tiverton - Dulverton (Mon - Sat 1 trip, school service pm only 1 trip, Mon - Sat 1 trip)
- Bus Service 678 Dulverton - Minehead (Thurs 1 trip)
- Bus Service 5B Winkleigh - Exeter (Mon - Fri 2 trips, Sat 1 trip)
- Bus Service 647 Exeter - Hatherleigh (Fri 1 trip)
- Bus Service 647 Hatherleigh - Exeter (Fri 1 trip)
- Community Bus Service Brushford - Tiverton (regular free service).

What key services/community facilities does this settlement have? (e.g. a shop, pub, village hall, doctor surgery): Church, play area, games court (tennis, hockey, basketball, netball), parish hall, petrol station including minimarket, newsagent and off-licence.

Distance from the settlement centre: 400m

Does the site have access to utility services? (e.g. gas, electricity, water, sewerage)

There are a full range of services available in the vicinity.

Are you aware of any restrictive covenants within or adjacent to the site?

None.

Does the site require the acquisition of any 3rd party land to provide access to an adopted highway?

No.

Somerset West and Taunton

6. Potential Yield

How many units can the site accommodate? Approximately 10-20 dwellings. It is envisaged that built development would be contained to the south of the site to reflect the consented building line with potential for ecology and/or carbon offsetting measures within the northern, elevated part of the site.

Signed:



Date: 16th March 2020

Please return this form, along with a site plan to:

Email: strategy@somersetwestandtaunton.gov.uk

Post: Planning Policy
Somerset West and Taunton Council
PO Box 866
Taunton
TA1 9GS

SITE LOCATION PLAN

AREA 25 HA

SCALE: 1:2500 on A4

CENTRE COORDINATES: 292280 , 125912

