

From: [Catherine Knee](#)
To: [Strategy](#)
Cc: [Simon Collier](#)
Subject: Mr Brading
Date: 13 March 2020 16:55:23
Attachments: [image001.png](#)

Dear Gill,

Please find attached representations on behalf of Mr Brading together with a site plan of his land at Kingston St Mary.

I attempted to submit comments online however the majority of our responses exceed the maximum word limit, and I was unable to include attachments.

I would be grateful if you could confirm receipt by return. Thanks.

Kind regards,
Catherine



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Please note my working days are Tuesday, Thursday and Friday.

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From: Strategy <strategy@somersetwestandtaunton.gov.uk>
Sent: 13 January 2020 12:58
To: Strategy <strategy@somersetwestandtaunton.gov.uk>
Subject: Somerset West and Taunton Council Local Plan Issues and Options Consultation

Email Ref Public Consultees A-E

Dear Sir/Madam

Somerset West and Taunton Council Local Plan Issues and Options Consultation

We are now consulting on the Local Plan Issues and Options document for the newly formed Somerset West and Taunton Council (excluding the Exmoor National Park Area). The consultation will take place from Monday 13th January to Monday 16th March 2020.

The Local Plan will cover the new district area but does not include the area covered by Exmoor National Park. In order to produce a good Local Plan we need to engage with the local communities and businesses to understand what is important to them in their area.

This is the first consultation stage in the Local Plan process. It sets out the key issues and draft objectives for the Local Plan particularly around climate change and development needs over the next 20 years.

At the same time, we are inviting comments on two documents which are needed to support and evidence the Local Plan: the Sustainability Appraisal Scoping Report; and the Habitats Regulations Assessment.

Please visit our website to find the documents and an opportunity to have your say: yoursay.somersetwestandtaunton.gov.uk.

Paper copies of the document will be available to view in all libraries in Somerset West and Taunton, as well as at council office receptions at Deane House (Belvedere Road, Taunton TA1 1HE) and West Somerset House (Killick Way, Williton TA4 4QA)

We will also be visiting these venues, where you can find out more and ask questions:

- Wellington, Quaker Meeting House – Thursday 23 January, 10am to 3pm
- Williton, West Somerset House – Thursday 30 January, 2pm to 7pm
- Taunton, the Orchard Shopping Centre – Thursday 6 February, 10am to 3pm
- Minehead, Methodist Church – Monday 10 February, 2pm to 7pm
- Watchet, The Sanctuary – Tuesday 11 February, 10am to 3pm
- Wiveliscombe, Community Centre – Thursday 20 February, 10am to 3pm
- Taunton, Deane House – Wednesday 26 February, 2pm to 7pm

For your information we are planning to consult on the Draft Plan later in 2020. We will write to advise you of the exact details and dates nearer the time, if

you would like to be removed from our consultation database please advise us by emailing strategy@somersetwestandtaunton.gov.uk.

Yours faithfully



Gill Littlewood

Strategy Case Manager

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

March 2020

REPRESENTATIONS ON BEHALF OF MR BRADING

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, 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.

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.

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 supply to outstrip demand.

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?

No comments at this stage.

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.

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 under-pinning 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.

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 agree with objective 7b/3 which seeks to conserve and enhance the natural beauty and exceptional character and quality of the landscape in the Areas of Outstanding Natural Beauty (AONB). This should not mean however that development should not be delivered in settlements within the AONBs on sites which are capable of being developed without causing significant harm to the appearance and character of the AONB. Proper consideration should be given to whether sites within such areas provide the best way to deliver the housing which is needed within those settlements, commensurate with their role and function, and in order to sustain their services and facilities.

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 such as Kingston St Mary, to be replaced by criteria based policies which enable development to come forward in appropriate locations.

Mr Brading owns land at Kingston St Mary (plan submitted separately). The site is situated on the northern side of the village and comprises a dwellinghouse known as Orchard Hill which sits within a very large garden. Orchard Hill and its garden immediately adjoins existing residential development to the north and south. Vehicular access to the site is provided from Kingston Road to the east.

The site is situated within the southern fringe of the Quantock Hills Area of Outstanding Natural Beauty (AONB), a designation which applies to a large part of the village. However, the site is visually well contained, being within the established building line of existing development to the north and south and the surrounding garden is bound on all sides by native species hedgerow and mature tree planting making views into the site from any public vantage point very limited.

The southern boundary of Orchard Hill abuts the settlement boundary of the village and the site is situated within close proximity (300m radius) of a number of local services and facilities to include the village school, a public house, a place of worship, village hall, shops and playing fields.

The site is available for development and is suitable for accommodating housing development of a scale commensurate with the role and function of the village. It is recommended that it is considered as an allocation for housing within the new Plan.

Question 8b/1- 8b/2:

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

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.

Site Identification Plans

