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To: [Strategy](#)
Cc: [Neal Jillings](#); [Laura Mckechnie](#)
Subject: Place Land SW Ltd
Date: 16 March 2020 10:40:27
Attachments: [image001.jpg](#)

Dear Sir / Madam,

Please find attached a response made on behalf of my client Place Land SW Ltd to provide representations in response to the Somerset West & Taunton Local Plan 2040 Issues and Options Consultation. Place Land have a legal interest in land to the west of Creech Heathfield. The representation is accompanied by a location plan which confirms the extent of that interest.

I would be grateful to receive acknowledgement that this representation has been received and to be kept informed of the Local Plan Review progress.

Best regards,

Darren

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16th March 2020
Our Ref: DS/18.285

Strategy Team
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Somerset
TA1 1HE

SENT VIA EMAIL

Dear Sir / Madam

**Somerset West & Taunton Local Plan 2040 – Issues & Options Consultation
Representations on behalf of Place Land SW Ltd**

I am writing on behalf of my clients Place Land SW Ltd (Place Land) to provide representations in response to the Somerset West & Taunton Local Plan 2040 Issues and Options Consultation. Place Land have a legal interest in land to the west of Creech Heathfield. This letter is accompanied by a location plan which confirms the extent of that interest.

This representation focuses on the following matters:

- Proposed housing requirement;
- Options for the distribution of development;
- Strategic considerations for focus of growth at Taunton; and
- Proposals to maintain all existing green wedges.

The representation also confirms that land to the west of Creech Heathfield is a sustainable location and should be considered for future development.

Providing the right number of new 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 National Planning Policy Framework (NPPF) requires the Council to establish a housing requirement for the whole area (Paragraph 65). As set out in the NPPF:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals (Paragraph 60).

The National Planning Practice Guidance (NPPG) confirms that a local housing need figure is calculated at the start of the plan-making process, but that this number should be kept under review and revised where appropriate. It must be appreciated that the housing need figure generated using the standard method may therefore be subject to change as the inputs are variable and this should be taken into consideration by the Council (Paragraph: 008 Reference ID: 2a-008-20190220).

The NPPG states that:

The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure (Paragraph: 002 Reference ID: 2a-002-20190220).

When considering when it might be appropriate to plan for a higher housing need figure than the standard method indicates, the NPPG advises that:

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates (Paragraph: 010 Reference ID: 2a-010-20190220).

The Government's objective of significantly boosting the supply of homes is set out in the NPPF (Paragraph 59). A council's ambitions to support economic growth, to deliver affordable homes and to meet unmet housing need from elsewhere, may necessitate a housing requirement figure higher than the minimum number identified by the standard method. As explained further below, there is clear justification in Somerset West & Taunton for a housing requirement above the minimum level proposed.

Firstly, the NPPG advises that if previous housing delivery has exceeded the minimum local housing need, the Council should consider whether this level of delivery is indicative of greater housing need. The current adopted housing requirement for the area is 995 dwellings per annum. This substantially exceeds the minimum figure and the Council needs to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard method suggests (Paragraph: 010 Reference ID: 2a-010-20190220).

Secondly, the Heart of the South West Local Enterprise Partnership, which covers Devon, Plymouth, Somerset and Torbay, aims to double the size of the area economy by 2038. This ambitious growth target will require a significant increase in the number of jobs in Somerset West & Taunton and elsewhere. This may in turn require an increase in housing provision above the minimum level to ensure that a lack of labour does not become a constraint to the achievement of the economic growth objectives for the sub-region. The NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (Paragraph 8). The Council



should therefore ensure that there will be sufficient homes for workers so as to align with forecast growth in jobs.

Thirdly, the NPPG confirms that total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the development plan should be considered where it could help deliver the required number of affordable homes (Paragraph: 024 Reference ID: 2a-024-20190220).

The NPPG also advises that all households whose needs are not met by the market and which are eligible for one or more of the types of affordable housing set out in the definition of affordable housing in Annex 2 of the NPPF, are considered to be in affordable housing need (Paragraph: 005 Reference ID: 67-005-20190722). The Council should therefore assess its affordable housing need as defined by the NPPG. This figure may well be significant in comparison to the minimum level. A higher overall housing requirement will contribute towards delivery of a greater number of affordable homes. Whilst it is acknowledged that the Council may not be able to meet its entire affordable housing need, an uplifted housing requirement above the minimum level will make a contribution to doing so.

Fourthly, the Local Plan should be prepared through joint working on cross boundary issues such as where housing needs cannot be wholly met within the administrative areas of individual local planning authorities. As set out in the NPPF, the Local Plan should be positively prepared and provide a strategy which as a minimum seeks to meet its own housing need in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). Somerset West & Taunton adjoins North Devon, Mid Devon, East Devon, Sedgemoor and South Somerset councils. As required by the NPPG, an agreed position on housing needs should be set out in a Statement of Common Ground signed by these respective authorities. This should be publicly available by the time of publication of a Draft Plan (Paragraph: 010 Reference ID: 61-010-20190315 and Paragraph: 020 Reference ID: 61-020-20190315).

Distribution of housing

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?

Question 2c: Do you think we should carry on with the way housing is currently distributed across our area or should we be doing something different, such as one of the three options suggested above?

New development should be directed to the most sustainable locations and Place Land supports the identification of Taunton as the main focus for strategic growth. It is the largest settlement and home to approximately 70,000 people, or just under half of the Somerset West & Taunton population. There are a wide range of facilities and services within Taunton, typical of a settlement of its size. These include employment opportunities and a retail centre. Other facilities and services include education, leisure, sports and health care. The town is the main economic centre within the Plan Area.

Taunton has excellent connections to the strategic transport network, including access to road links via M5, A38 and A358. The railway station provides services to Manchester Piccadilly, Birmingham New Street, Cardiff Central, Bristol Temple Meads, London Paddington, Exeter St Davids, Plymouth and Penzance, as well as the rest of the region.



Whilst it is important that an appropriate level of development is directed toward rural locations to promote sustainable development and support the ongoing vitality of communities, Place Land generally support an approach to the distribution of housing that increases the proportion of development to Taunton (Option D or E). This will be required to support for the continued growth, economic development and prosperity of the town, plan area and wider sub-region and to maximise the opportunities to take advantage of existing and planned infrastructure in the vicinity.

Strategic considerations for and increased focus at Taunton

Should the Council recognise the justification outlined above for a higher level of growth, the Local Plan will need to consider a range of alternative options for development at Taunton. Taunton Deane Borough Council (TDBC) went through the process of considering a number of strategic options to accommodate growth at Taunton for the purpose of the preparation of the Core Strategy. A review of that process offers a helpful insight into the key issues that will need to be considered for the review of options for the growth in this location.

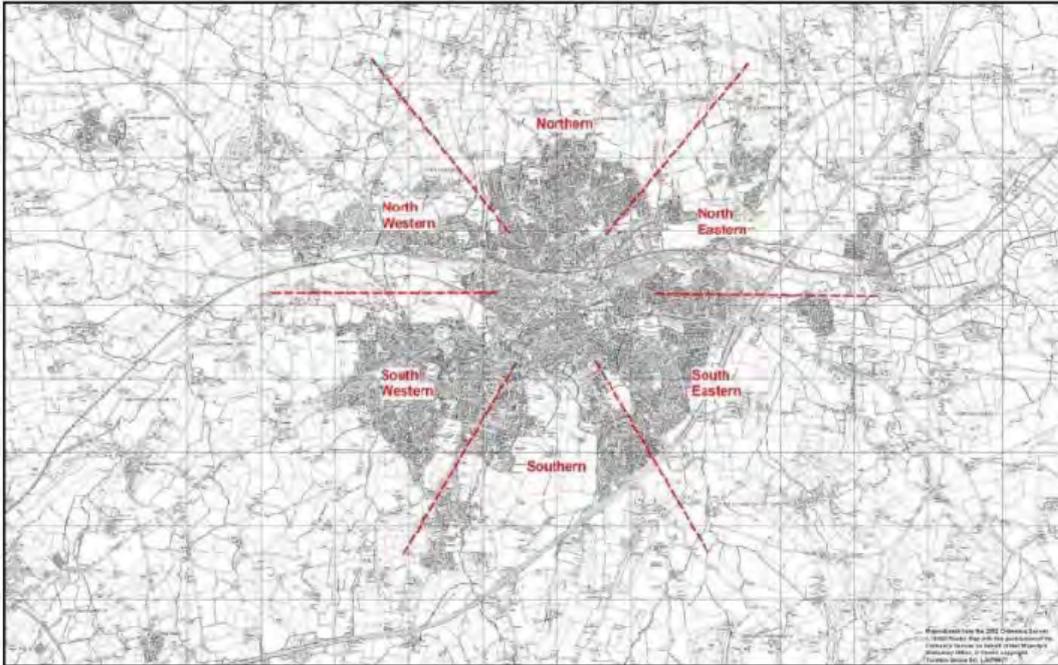
A number of studies were carried out on behalf of the TDBC. A summary of the options tested, along with the results were previously published in a Strategic Development Options Topic Paper. The summary below provides an overview of the key stages in the process and the conclusions set out in the paper.

The process began with a 'strategic sieving exercise' to identify areas that were unsuitable for expansion. This exercise considered the following issues:

- Floodplain;
- Agricultural Land Quality;
- Landscape Quality;
- Natural Heritage;
- Cultural Heritage;
- Land Use;
- Infrastructure and Services;
- Transport and Accessibility;
- Socio-economic Issues; and
- Market Delivery.

This initial sieve identified that the only areas around Taunton that were unsuitable for a major urban extension were those related to areas of high flood risk to the east and west of the town. The next stage of the process divided the town up into the six segments as illustrated below.





The six areas were assessed in detail, to establish the likely environmental effects of development. The following conclusions were reached:

Northern sector – Wellsprings, Pyrland and Priorswood: this area was considered to have no realistic opportunities for significant expansion in view of the extent of the County Wildlife Site at Pyrland Park, impact on Hestercombe House SAC, and landscape impact.

North eastern – Bathpool and Monkton Heathfield: the appraisal identified that much of the area was less sensitive to additional development (albeit impact on the Quantock Hills AONB was recognised as a particular concern).

Southern eastern – Stoke St Mary: whilst the assessment recognised there were no particular landscape constraints or designations, expansion in this area would have a significant impact on landscape character in view of the land's open nature, and its proximity to high ground. Moreover, in view of the area's physical separation from the town by M5 and the absence of existing services and facilities, it was considered difficult to integrate an urban extension with the town and as such it should only be considered as a "very long-term option".

Southern – (Vivary) Green Wedge: the assessment identified that under this option significant detrimental impacts would occur in terms of recreation, landscape and wildlife. Moreover, the historic connection between Trull and the countryside and its distinct landscape character would be lost.

South western – Bishops Hull and Comeytrove: the assessment stated that an extension in this area would seem to be acceptable in landscape terms and is relatively free from environmental constraints. The key issue identified was on the change of character of the area and the loss of sense of remoteness likely to be experienced in the event of large-scale development.

North western – the major impacts identified related to those on Norton Fitzwarren and adjacent Special Landscape Features. The assessment also highlighted that there was unlikely to be sufficient

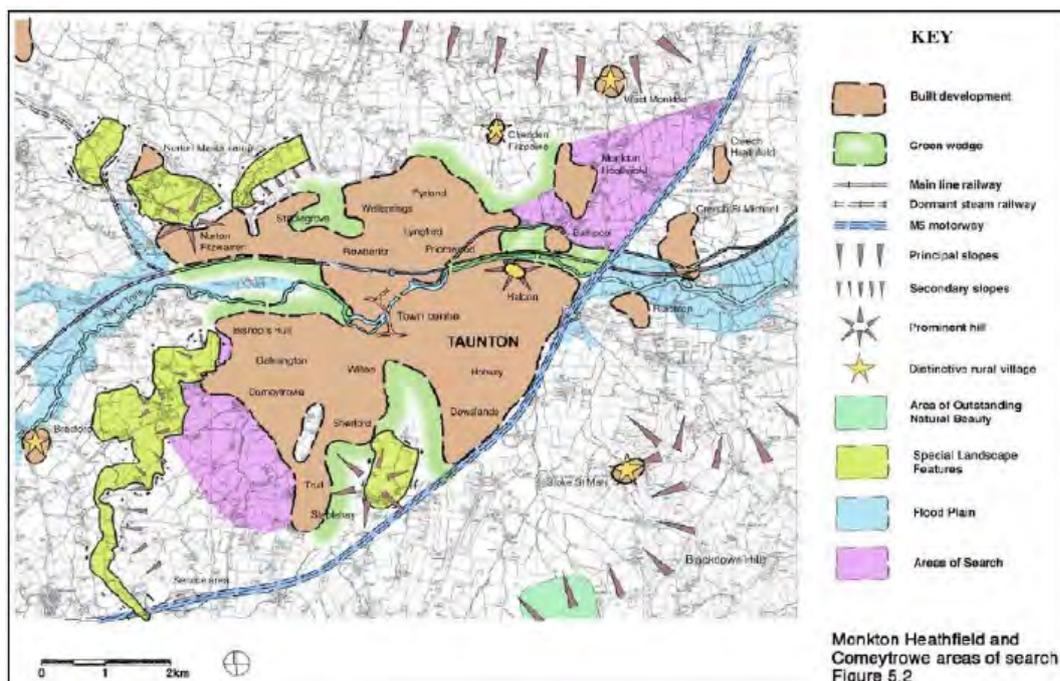


land within this area to accommodate a strategic urban extension unless it included the redevelopment of Norton Manor Camp.

On the basis of the analysis summarised above, TDBC identified two option areas: Monkton Heathfield in the north eastern segment and Comeytrove in the south western segment for a more detailed appraisal of the following issues:

- Agricultural Land Quality;
- Landscape Quality / Visual Impact;
- Natural Heritage;
- Cultural Heritage;
- Land Use;
- Services and Infrastructure;
- Transport and Accessibility;
- Socio-economic Issues; and
- Market Delivery.

The diagram below illustrates a number of the key features and high-level constraints that were identified around Taunton as part of the analysis.



The assessment recommended that Monkton Heathfield was the most appropriate location for a major urban extension to Taunton, consistent with the earlier RSS assessment process.

Further analysis considered the sustainability and deliverability implications of a number of growth scenarios. The study concluded that the development of land to the north (including land at Monkton Heathfield) was the most sustainable growth option:

Option 1b to the north is the most sustainable growth option primarily because of the existing public transport and cycling/walking corridors into the town centre, its access to the strategic road network,



major employment sites and to education facilities, and its close proximity and positive effect on Taunton's most deprived wards. Furthermore, a northern outer distributor road as part of option 1b would aid in achieving wider sustainability objectives e.g. improved access to West Somerset. There is also potential to further extend an existing allocated 'Strategic Employment Site' at Monkton Heathfield in conjunction with other development in the area.

In addition to the above, the study also recommended a further urban extension at Comeytrowe.

A key conclusion that can be drawn from the review above, is that the area around Taunton is significantly constrained in a number of directions. These constraints are unlikely to have changed during the intervening period and therefore will need to be taken into consideration when the Council considers the potential options for development to accommodate growth as part of the Local Plan Review.

Whilst to accommodate further growth the Council will need to reconsider previous options for development, the ongoing development of a major urban extension at Monkton Heathfield will provide further options to consider as part of that process. This should include areas of land beyond the planned urban extension that could readily connect with the facilities that are being provided within it. Any further development east of the M5 would be well-located to integrate with the proposed development at Monkton Heathfield.

It must be acknowledged that the presence of the motorway itself does not limit development to the east of Monkton Heathfield and the M5. As shown at Exeter and elsewhere, development that links to existing and planned facilities can be accommodated beyond the route of the strategic road network. Further transport connections could be provided should these be necessary, but one of the key initial considerations for any potential site is the sustainability of the location. As explained further below, land west of Creech Heathfield clearly meets this requirement.

Maintaining green wedges

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

Objective 7 of the Issues and Options Document is to 'protect and enhance the environmental, historic, economic and wellbeing value of the District's distinctive landscapes, biodiversity and local character. The Council propose a number of additional policy approach to meet this objective, including:

7b/5 Protect, conserve or enhance landscape and townscape character whilst maintaining green wedges, green infrastructure networks and open breaks between settlements exploring opportunities for Local Green Space Designations.

It is important to recognise that the existing green wedges have not all been designated using the same approach or methodology. There is a clear inconsistency in this regard, with for example the green wedge recently designated in the Creech St Michael Neighbourhood Plan having not been assessed in the same manner as those designated in the Core Strategy.

If the Local Plan intends to maintain all green wedges as proposed, then it is clearly necessary for all of these areas to be subject to the same assessment. Whilst there is no prescribed methodology for defining green wedges, in the interests of good plan making and thoroughness it is for example necessary that all green wedges within the same Plan Area are subject to an assessment using an identical methodology.



For the avoidance of doubt, we can confirm that the green wedge designated by Policy CSM11 of the Creech St Michael Neighbourhood Plan was not assessed using the same methodology as those elsewhere in the former TDBC Plan Area.

For example, whereas TDBC's Green Wedge Assessment (June 2015) included a thorough landscape assessment of potential green wedges across fourteen separate criteria, the same criteria were not used to inform the assessment for the Creech St Michael Neighbourhood Plan green wedge. It is also of note that the TDBC assessment was carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment (Third Edition 2013), but there is no indication that the assessment for the Creech St Michael Neighbourhood Plan was carried out in accordance with these guidelines.

In summary, it must be recognised that it has not been confirmed that the assessment for the Creech St Michael Neighbourhood Plan green wedge provides the level of detail required in order to be robust. It would therefore be incorrect to assume that all green wedge areas are suitable for the same ongoing designation and policy approach.

Land west of Creech Heathfield

Land west of Creech Heathfield was submitted for consideration through the Strategic Housing Land Availability Assessment (SHLAA) in December 2018. The accompanying location plan confirms the extent of the site.

The site is about 4.5 miles from the centre of Taunton. It falls between the hamlet of Creech Heathfield (to the east) and the M5 motorway (to the west). Creech St Michael is to the south – this is a bigger village and has a primary school, shop and post office, pub, two churches, a village hall, recreation ground, industrial estate and medical centre. The Bridgwater and Taunton Canal runs east-west through the village, providing pedestrian and cycle connection into the centre of Taunton.

The site is well-related to Monkton Heathfield; an urban extension to the northeast of Taunton that is allocated in the Taunton Deane Borough Council Adopted Core Strategy (2011- 2028) for mixed use development including; 4,500 homes, a new district centre, employment land, three primary schools, a secondary school, country park and associated infrastructure. A technical note on transport and accessibility has been produced by consulting engineers Hydrock. This concludes that the site west of Creech Heathfield is well-located with good vehicle, pedestrian and cycle and public transport links to everyday facilities in Creech St Michael and the outer edge of Taunton, as well as to the new facilities being brought forward at Monkton Heathfield.

The Council considered part of the submitted site for the SHLAA (March 2019) under site reference MIN047 (Land off Langaller Road, Creech St Michael). At this stage it is unclear why only part of the submitted site has been assessed. The SHLAA advises that the Council consider the assessed part of the site to be 'non-developable'. No further information is provided in the report to explain why this conclusion was reached. In response to a request for further information, the Council have advised that they are unable to locate and provide the assessment sheet for the site. It should be acknowledged that this lack of published information means that we have been unable to review the specific reasons why the Council consider the site to be non-developable, or to provide a response regarding this. This matter must be addressed as soon as possible, so as to provide Place Land with the opportunity to provide a more detailed response to the Council's assessment of the site.

Notwithstanding the above, we re-affirm that the proposed site's proximity to existing and planned development at Monkton Heathfield, demonstrates that it is in a well-placed and sustainable location for future development. A strategic development in this location would enhance the overall critical



mass at Monkton Heathfield and could be delivered in a manner that enhances existing ecology corridors and improves public access to green space.

As confirmed elsewhere in this representation, there are likely to be very limited options for further development at Taunton. Land to the west of Creech Heathfield should therefore be given thorough consideration through the plan making process. The site could readily be integrated with planned development and its physical separation from Taunton and the Monkton Heathfield development do not alone constitute grounds for it to be considered non-developable.

Place Land would welcome an opportunity to discuss the proposed allocation of the site in further detail with the Council through the plan making process.

I would be grateful to receive acknowledgement that this representation has been received and to be kept informed of the Local Plan Review progress.

Yours faithfully



Darren Summerfield
Associate Director
LRM Planning Ltd
darrensummerfield@lrmpanning.com





 Application boundary



Crech Heathfield Location Plan		A
		SK/NE
170805 L 01 01	1:5000 @ A3	August 2018

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