

From: [Leonie Stoate](#)
To: [Strategy](#)
Subject: Tetlow-King - Somerset West & Taunton Local Plan Issues & Options consultation
Date: 16 March 2020 14:05:17
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Good afternoon,

Please find the attached letter in response to the Somerset West & Taunton Local Plan Issues & Options consultation.

Regards,

Leonie Stoate BSc (Hons) MSc
Assistant Planner

TETLOW KING PLANNING

Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol BS16 5EL

Tel: 0117 9561916

Website: www.tetlow-king.co.uk



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

Date: 16 March 2020

Our Ref: LS M19/0408-01

By email only:

strategy@somersetwestandtaunton.gov.uk

Dear Sir/Madam

RE: SOMERSET WEST AND TAUNTON LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

We represent the **South West Housing Association Planning Consortium** which includes all the leading Housing Association (HAs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the South West region.

As significant developers and investors in local people, HAPCs are well placed to contribute to local plan objectives and act as long-term partners in the community. We welcome the opportunity to make comments on this document.

Chapter 5.1 – Carbon neutrality

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

With specific reference to policy approach 1c/2, we ask that the Council considers the wider implications of requiring all new developments to provide infrastructure for the use of low emission vehicles. In our experience, the requirements for low emission vehicle infrastructure requires significant upfront planning for matters including installation, charging to the consumer, management and maintenance. We suggest that the Council undertakes a separate assessment of the need and expectations for low emission vehicle infrastructure and seek to publish guidance on this before adopting this requirement in policy.

Chapter 5.3 – New and affordable homes

5.3.1 Providing the right number of new homes

Affordable housing definition

We note that the Issues and Options document currently refers to affordable housing as social rented, affordable rented and intermediate housing. In order to ensure clarity, we recommend that the forthcoming draft Local Plan refers directly to the official definition for affordable housing as laid out in Annex 2 of the NPPF. Ideally, the plan should simply refer readers to Annex 2 as this would ensure the longevity of the plan, allowing it to flexibly accommodate any changes to the definition.

Affordable housing policy

Affordable housing policy should reflect the NPPF in encouraging a more diverse housing stock while enabling the delivery of sufficient market housing to improve the ability of developers to deliver an

appropriate and higher quantum of affordable housing. Similarly, it is important that the Council considers the most effective wording that *encourages* and *enables* delivery of affordable housing, without placing unnecessary restrictions and additional hurdles to frustrate delivery.

Design

In order to aid in the delivery of affordable housing, the Council should look at ways to allow flexible design in the local plan. While precautions should be taken to prevent poor design, policies that over restrict design can hinder the delivery of affordable units, for example, restrictive policy on densities.

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 method only identifies a minimum annual housing need figure. It does not produce a housing requirement figure. The PPG recognises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. We recommend that Councils set ambitious housing requirement figures in order to ensure that housing need is being met. The PPG states the following:

"Is the use of the standard method for strategic policy making purposes mandatory?"

No, if it is felt that circumstances warrant an alternative approach, but authorities can expect this to be scrutinised more closely at examination."

(Paragraph: 003 Reference ID: 2a-003-20190220)

The PPG continues:

"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

(Paragraph: 010 Reference ID: 2a-010-20190220)

In addition to an overall housing requirement, we encourage the Council to set an evidenced, credible affordable housing requirement figure for the plan period to enable the Council to comparatively monitor affordable delivery against targeted provision. The Council should set an ambitious target for affordable housing as a mechanism to significantly increase delivery and improve affordability across the area, provided it is supported by a robust viability assessment. An affordable housing requirement figure should reflect the updated definition of affordable housing.

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?

We understand the need to incorporate a proportion of dwellings to meet the category standard, as set out in Building Regulations Part M, in order to provide for those in need. Therefore we support such policy requirements where robustly evidenced.

Before the Plan incorporates the Government's *Accessibility and Wheelchair Housing Standards*, we request that the Council undertakes a thorough assessment of need and viability and tests the impact of the introduction of these standards. The PPG states:

"There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- *The likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *The accessibility and adaptability of existing housing stock.*
- *How needs vary across different housing tenures.*
- *The overall impact on viability."*

(Housing: optional technical standards, paragraph 007, Reference ID:56-007-20150327)

The same section of the PPG also provides additional guidance and resources in terms of how Local Planning Authorities can undertake and inform their assessments. It is recommended the Council refers to this guidance before it proceeds with seeking to incorporate the Accessibility Standards.

Introducing the standards will inevitably create cost implications on Housing Associations. An assessment into the Cost Impacts of the Accessibility and Wheelchair Housing Standards¹ found that the Category 2 access standards varied from £520-£940 per dwelling, **excluding** costs of additional land associated with the requirements of the standards. It is therefore important that the standards are introduced through a robust evidence base, which includes a thorough assessment of viability.

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-built plots on Rural Exceptions sites provided that they are affordable?

The NPPF states that self-build housing can be either market or affordable housing. We support the requirement for a proportion of self-build and custom build plots to be allocated as affordable housing although we would encourage the Council to adopt all four options for delivery provided there is enough demand for self-build plots in Somerset West and Taunton.

The NPPF is clear that rural exception sites (RES) should seek to address the needs of the local community (paragraph 77). RES can be a useful affordable housing delivery tool, therefore the Council should look to allow self-build plots on RES where justified, where they can be retained as affordable in perpetuity.

We would like the opportunity to state that any requirement to deliver affordable housing should be separate to the delivery of self and custom-build plots. This is because affordable, self and custom-build plots have very different requirements for funding and delivery. Given the need for affordable housing across Somerset West and Taunton, the affordable housing requirement should not be off-set by self and custom-build delivery.

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

Policy approach 3e/5

We are pleased to see that the Council are willing to support the delivery of affordable housing on Rural Exception Sites (RES), considering the importance of RES in delivering a large proportion of affordable housing. We recommend the Council considers as many suitable sites adjoining existing and new settlement boundaries as possible.

The introduction of entry-level exception sites in the NPPF has been widely welcomed as an addition to the opportunities Housing Associations have to meet housing needs in areas that may not otherwise have been considered suitable for general housing proposals. We encourage the Council to introduce

¹ Housing Standards Review: Cost Impacts (EC Harris for DCLG, September 2014)

a locally specific policy on entry-level exception sites that enables delivery of affordable housing-led schemes that are aimed at first-time buyers and renters and seek to allocate land specifically for these sites to encourage further delivery. It is important to note that unlike the policy on rural exception sites the NPPF does not seek to secure affordable housing delivered on entry-level exception sites *in perpetuity* so it would be inappropriate to require this in a local policy.

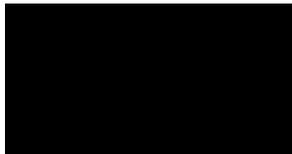
Policy approach 3e/6

While we can understand the benefits of applying the Governments' Space Standards to some aspects of development, we would advise the Council not to apply the standards across all residential development. Doing so would undermine the viability of development schemes and through viability testing of application proposals, will result in fewer affordable homes being delivered. In addition, many households may not desire, or require housing that meets these standards, as it will result in for example, higher rental and heating costs. There will be occasions where it is neither practical nor necessary to achieve the NDSS.

In order for the Council to implement the NDSS across all residential development, it must be demonstrated that it is being done to address a *clearly evidenced need*, as set out in the Planning Practice Guidance. The NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard, therefore it is not essential for all dwellings to achieve the standard in order to provide a good quality of living.

The above comments are intended to be constructive, to ensure the policies are found sound at examination. We would like to be consulted on further stages of the above document and other publications by the Council, by email only to consultation@tetlow-king.co.uk; please ensure that the **South West Housing Association Planning Consortium** are retained on the consultation database, with **Tetlow King Planning** listed as its agents.

Yours faithfully



LEONIE STOATE BSc (HONS) MSc
Assistant Planner
For and On Behalf Of
TETLOW KING PLANNING

leonie.stoate@tetlow-king.co.uk

cc: Aster
Clarion
Curo
LiveWest
Stonewater
Yarlington

Katie Furner – Development Enabler
Sue Southwell – Development Enabler
Gordon Dwyer – Development Enabler