

From: samantha.thomas
To: [Strategy](#)
Cc: [simon.coles](#)
Subject: Summerfield Developments 002
Date: 12 March 2020 15:17:30
Attachments: [image001.png](#)

Dear Sirs

Please find attached our representations on the Issues and Options Consultation and a completed Call for Sites form submitted on behalf of our client Summerfield Developments.

We would be grateful if you could confirm receipt.

Kind regards

Sam

Samantha Thomas
Principal Planner

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WYG



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**A116712
SOMERSET WEST AND TAUNTON LOCAL PLAN 2040
ISSUES AND OPTIONS CONSULTATION REPRESENTATIONS ON BEHALF OF SUMMERFIELD
DEVELOPMENTS (SW) LTD
12 MARCH 2020**

Introduction

WYG has been instructed by Summerfield Developments (SW) Ltd to make representations in connection with the above.

Summerfield Developments has an interest in land at Chelston, Wellington for commercial development. This land is subject to a separate Call for Sites submission.

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

Section 4: Objectives

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

The identified objectives are laudable, but they need to be realistic and achievable as not every development will be able to comply with all of the objectives.

Objective 1 – Carbon Neutrality

Whatever standards/measures are adopted these need to be pragmatic and flexible with clear guidance provided as to how these are to be assessed and evidenced.

Objective 2 – Settlements

Specific reference should be made to Wellington to reflect its growing importance in the settlement hierarchy and to distinguish it from other more minor towns in the district.

Objective 5 – Infrastructure

The delivery and funding for any identified infrastructure needs to be clear and achievable.



Objective 6 – Change to Travel Behaviour

This should be about planning for development in locations that provide opportunities for non-car journeys and to reduce the need to travel for day to day needs.

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. Any adopted measures or solutions need to have a degree of pragmatism and flexibility so as not to unduly burden or stifle development coming forward in a timely manner or add to costs that might affect viability, thereby prejudicing delivery. Enough time needs to be provided for developers to consider which measure(s) would be appropriate for their types of development and construction methods, and where this involves the development of new technology and materials, there needs to be sufficient lead in time for these to be designed and produced. 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.

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

No comment.

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

No comment.



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?

We agree with the tiers as proposed in so far as they relate to Wellington, in particular the acknowledged importance and role of Wellington after Taunton.

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 comment.

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?

While Taunton's importance is recognised, Wellington is growing in importance and prominence with the commercial growth around Chelston and the residential growth at Jurston Farm and Longforth Farm. The supporting text at section 5.11 clearly identifies that Wellington "is the District's secondary centre, after Taunton" (p 44), a role that can and should grow given the town's strategic and sustainable location. Wellington is ideally located on the national and regional road network, is well served by public transport and has relatively few development constraints. We would therefore support a higher proportion of development for Wellington than the current 13.1% to better reflect the strategic importance of the town within the hierarchy. An increase in jobs and housing provision within Wellington would enable the town to achieve a higher level of self-containment through housing growth in turn supporting additional growth in employment and other facilities, including the potential for the railway station to be reopened.

At the same time however, we consider it important that development is allowed within the lower tiers (Tiers 3 – 6) at the same or very similar levels as currently identified to support reasonable growth in those locations.



We would therefore advocate a fourth option for the proposed housing distribution whereby a modest part of the percentage growth currently allocated to Taunton is re-distributed to Wellington, but the percentage growth attributed to the lower tiers remains the same or similar. We would advocate a 60/20 split between Taunton and Wellington. This would still focus the majority of growth to Taunton but would better distinguish Wellington from the lower tiers and give it more primacy after Taunton.

What is important within the final percentage allocation is that the plan identifies or allows for a variety of sites, both in size and location, to come forward within each defined tier to provide a greater element of resilience to future housing and employment delivery. A broader spread of development across the district and within each tier, together with a more varied range and size of sites, will enable development to come forward at different rates with less susceptibility to localised market conditions. This will reinforce the economic buoyancy of the district.

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

No comment.

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 (typically 25%) from housing developments. By lowering the annual housing requirement, affordable housing delivery in the District will also be reduced compared to the current rate. Objective 3 "To provide a sufficient and varied supply of high quality and affordable homes" may therefore not be met.
- 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 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. The standard methodology cannot therefore be relied upon without further assessment.

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

No comment

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?

No comment.



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?

No comment.

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

No comment.

5.4 A prosperous economy

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?

We would strongly advocate that both aspects are important and are not mutually exclusive. While the provision of more higher value/quality jobs is of a significant benefit to the district and local economy, a general increase in job numbers overall also provides significant benefits. Provided employment policies are positive, and sufficient allocations are made to both meet the needs of a range of employment uses and sizes and to provide sufficient housing to support such growth, there is no reason why both aspirations cannot be delivered. Employment policies and allocations should also be flexible to allow for new/emerging employment uses and ancillary facilities to come forward to support existing commercial sites, where there is demand. Wellington is particularly well suited to deliver this type of growth given its strategic and sustainable location, and further residential and commercial development providing a better balance of housing and jobs will enhance and add to the self-containment of the town.

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?

While maintaining employment allocations is important to ensure there is enough land identified for new and expanding businesses, there should also be an element of pragmatism about allowing alternative uses – both alternative employments generating uses or non-employment uses – on such sites where fully evidenced and justified. There are several reasons why allocated sites do not come forward and a sensible list of criteria against which this can be assessed, based on evidence from landowners and



operators, would allow better alternative uses to come forward when needed, while retaining allocations which can meet a specific demand, for example protecting a larger site for a single end user to allow new / relocated large scale businesses. We would therefore support option iv.

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

No comment.

5.5 Infrastructure

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

This is a difficult question that needs to be answered based on an understanding of the identified housing requirement (referring back to our comments made in response to question 3a) and viability testing. Any assumptions made about the relative costs of providing the different infrastructure elements listed should 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.

Question 5b: Do you have any comments on these policy approaches?

No comment.

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?

No comment.



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

No comment.

5.7 The natural and historic environment

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

No comment.

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?

No comment.

5.9 Wellbeing of our residents

Question 9a: Do you have any comments on these policy approaches?

No comment.

5.10 Policies for our places: Taunton

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

No comment.

Question 10b: Do you have any comments on these policy approaches?

No comment.

5.11 Policies for our places: Wellington

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

With respect to proposed policy 11a/1 we fully support the delivering of new employment uses in Wellington.

With respect to proposed policy 11a/4 we would support the retention of the strategic employment allocation so that this site remains available to meet the bespoke needs of a large scale end user, but this should be supported by further allocations within its vicinity and on other sites around Wellington. Westpark 26 is nearly full and there is a need to provide future flexible opportunities to meet a local and wider strategic need in Wellington. Referring back to our response to question 4b above, the approach to allocations needs to balance a need for flexibility with the need to provide for a range of users and



unit sizes to ensure a viable and vibrant commercial offer. Support also needs to be given to the provision of reasonable ancillary facilities to support commercial sites.

5.12 Policies for our Places: The Coastal Strip

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

No comment.

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 Simon Coles
Position:		Director
Organisation:	Summerfield Developments (SW) Ltd	WYG
Address:	Tauntfield South Road Taunton TA1 3ND	Hawkridge House Chelston Business Park Wellington TA21 8YA
Phone:		01823 666150
Email:		Planning.wellington@wyg.com

1. Site Information

Site address: Land to the south east of Chelston

OS Grid reference: ST 1586520569

Site area: 15.020 acres / 6.87 hectares

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

Potential developer - option held on the land.

2. Site Description

Previous use: Not applicable

Existing use: Agricultural land

Is the site considered to be: Brownfield Greenfield

Proposed use:	Industrial	<input checked="" type="checkbox"/>	Open Space	<input type="checkbox"/>
	Offices	<input type="checkbox"/>	Residential	<input type="checkbox"/>
	Leisure (built form)	<input type="checkbox"/>	Gypsy & Traveller	<input type="checkbox"/>
	Retail	<input type="checkbox"/>	Self or Custom Build	<input type="checkbox"/>

Site description, including any relevant planning history:

The site comprises 2 no. fields with relatively flat topography, bounded by mature trees and hedgerows.

The Junction 26 slip road is located to the front (NE) of the site and there is a rural lane to the rear (SW). The adjoining land to the NW comprises 3 no. undeveloped fields allocated for employment uses under the Taunton Deane Core Strategy Policy SS5 and the land to the SW is undeveloped with the Foxmore Business Park set beyond.

There is no relevant planning history for the site itself, but the site is closely related to the established employment uses at Westpark 26 and Chelston Business Park.

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: 0-10 years

4. Site Details

Access to an adopted highway (*please describe*): Access can be taken from the M5 slip road to the front (NE) of the site. It may also be possible to secure access through the allocated employment site to the NW.

Vegetation on the site (e.g. trees, hedgerows): There are established trees and hedges to the site and internal field boundaries but there are no landscape, environmental, or heritage constraints relevant to the site.

Hydrological features (e.g. streams, watercourses): There are no hydrological features on the site but there is a stream (Haywards Water) to the boundary of the adjoining land to the SE. The land beyond the adjoining land is in the flood zone 2 and 3 but the site itself is in flood zone 1.

Other on-site features (e.g. particular landscape features, existing buildings, etc.) N/A

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

If yes, please give details:

Somerset West and Taunton

5. Site Accessibility

Within which settlement is the site located? The site is located within Wellington and is strategically located, being approximately 500m from Junction 26 of the M5.
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?

Please refer to the First Bus timetables for the 22/22A and 623 services which go via Wellington. There are several bus stops in the vicinity of the site along both the A38 and Taunton Road.

What key services/community facilities does this settlement have? (e.g. a shop, pub, village hall, doctor surgery):

There are a full range of commercial, retail, and community services available within Wellington and within the adjacent business parks. The provision of additional employment land to support future job growth would provide for a sustainable balance of housing and jobs.

Distance from the settlement centre:

The site is approximately 2.5km driving/walking distance from the town centre.

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

There are no services currently on site but there are a full range of services available in the vicinity. There are no known infrastructure deficiencies in the area.

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

No.

6. Potential Yield

How many units can the site accommodate?

B1, B2 and B8 uses up to 600,000 sq ft (55,741 sq m)

Signed:



Date: 12 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

Map Centre 315,843 120,568

0m 25m 50m 75m 100m 125m

N

