

From: [Mark Richards](#)
To: [Strategy; Povall, Sarah](#)
Cc: [Peter Grubb](#)
Subject: The Wyndham Estate
Date: 21 February 2020 17:52:45
Attachments: [image001.gif](#)

Dear Sarah

Please find attached a letter setting out the comments of The Wyndham Estate in respect of the Local Plan I&O consultation.

If there is anything you would like to discuss then please do not hesitate to come back to me.

In the meantime I would be grateful to receive an email response as confirmation of receipt.

Kinid regards

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21 February 2020



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Dear Ms Povall

Local Plan 2040 Issues and Options Consultation – Response by The Wyndham Estate

I write in response to a notification that Somerset West and Taunton Council is consulting on its Local Plan Issues and Options document. I write here in my capacity as planning agent for The Wyndham Estate, who are a landowner in west Somerset with significant land holdings at Williton, Watchet, Washford and other settlements.

For ease of reference, I have structured this letter to respond to specific questions within the consultation document. In particular this response will address matters relating to the suggested options for the distribution of development across the newly formed Council area and will provide an update on the delivery of the strategic site allocations at Williton and Watchet.

Question 2a: Do you agree with the tiers that identify Taunton followed by 6 tiers covering the other settlements. If not, what changes would you make and why?

Answer - No. The suggested hierarchy suggests a continued over-reliance upon Minehead for meeting development needs in west Somerset. It also fails to adequately recognise the role of Williton and Watchet as major rural centres and their potential for meeting development needs.

The proposal to position Taunton at the top of the settlement hierarchy, with Wellington in the second tier, is not disputed given the respective populations, locations and economic roles and functions of the towns. However, the positions of settlements below tiers 1 and 2 are disputed.

The purpose of the settlement hierarchy is to inform the overall strategy for the distribution of development. The position of a particular settlement within the hierarchy should take account of crucial factors including its role and function, the housing and economic needs of the community and its capacity for new development. With this in mind there are a number of issues with the suggested settlement hierarchy as follows.

Minehead

At present it is proposed to position Minehead within the third tier of the hierarchy (Coastal Town – Major Rural Centre). The suggested strategy for this tier is for new development to proportionately reflect its role and function as a medium sized town with a rural hinterland. Although the description as a major rural centre and a

medium sized town accurately reflects Minehead's existing role, its position in tier 3 does not take account of the town's limited capacity to deliver meaningful levels of growth.

Minehead is a town subject to extensive flood risk, enclosed by challenging surrounding topography and in close proximity to Exmoor National Park. These numerous and significant constraints severely limit the town's capacity for growth. The West Somerset Local Plan to 2032 outlined a strategy to direct the majority of its planned housing requirement at Minehead/Alcombe and this was justified largely on the basis that historically 80% of housing completions have been delivered at Minehead, Watchet and Williton. Part of the Local Plan strategy was to allocate land south of the A39 for a mixed development comprising approximately 750 dwellings and 3 hectares of compatible non-residential uses (policy MD2).

To date no new homes have been delivered at the MD2 allocation. So far applications have come forward for only two sites, which together represent a small proportion of the overall allocation. These have come forward independently of each other with no overarching masterplan, even though this is a specific requirement of policy MD2. A summary of the allocation's application history is provided below.

- On 28 September 2016 outline permission (all matters reserved) was granted for 80 dwellings at the land adjoining the Minehead Caravan Club, but this permission has now lapsed. The landowner in question has also now confirmed through the SHLAA process that this land is no longer available for development.
- On 11 November 2014 outline permission (all matters reserved except access) was granted for up to 71 dwellings. Following a lack of interest from developers the site was eventually purchased by the Homes and Communities Agency (HCA). The aim of the HCA (who are not developers) was to effectively de-risk the site to make it a more attractive prospect for developers. To this end the HCA submitted a reserved matters application, which was granted on 30 April 2018. Given there have been no applications to discharge pre-commencement conditions, it would appear highly likely that this consent will lapse on 30 April 2020. The fact that the site remains in the ownership of the HCA is further evidence that the site remains an unattractive prospect to developers and so is unlikely to come forward for development in the short to medium term (if at all).

The Council itself acknowledges the difficulties with the MD2 allocation in the Sustainability Appraisal accompanying the Issues and Options Paper, which states:

"Together, the proposed sites form an unbroken line on a ridge above Minehead, with a cumulative visual/landscape impact. The line of sites also acts as a barrier to bats from the Exmoor and Quantocks Oak Woodlands SAC, and would remove some of their feeding area. There is potential for residents of the proposed developments to have a significant cumulative recreational impact on the biodiversity of nearby woodlands and the National Park. Jointly, the Minehead sites could also affect views from high points in the National Park."

Given the combination of physical constraints, multiple land ownerships, unavailability of sites and lack of developer interest it is highly unlikely that the existing MD2 allocation is going to deliver the number of homes or other land uses sought by the policy in the short to medium term (if ever).

All of these factors are relevant when considering the future development strategy for Minehead. If the Council concludes that Minehead can no longer provide the primary focus for new development in the west Somerset area then this should be reflected in the Local Plan settlement hierarchy. The consequence of not doing so could be a continuation of the current situation, where the West Somerset Local Plan's (WSLP) over reliance on the MD2 allocation, which has not come forward as expected, has left a delivery gap that has undermined the overall development strategy. The consequence of this has been an increase in pressure to approve speculative applications on unallocated sites in other locations (primarily at Watchet). To avoid a continuation of this situation it is recommended that the Council reconsiders the position of Minehead within the hierarchy, or at least includes a recognition of the limited contribution it can make to meeting future development needs.

Watchet and Williton

Watchet and Williton are both currently positioned within tier 4 (Rural Centres), along with Bishop's Lydeard and Wiveliscombe. The current strategy for tier 4 settlements is to focus on the retention of essential facilities in rural communities, which implies a very restrictive approach to new development. This is not considered to be an appropriate approach for a number of reasons.

Bishops Lydeard and Wiveliscombe are located three miles and eight miles from Taunton respectively. Being so close to Taunton means that their role and function as a 'centre' to meet local needs is limited as it is so convenient to reach Taunton. Conversely, Watchet and Williton are located 15.5 and 13.5 miles from Taunton. The greater distance means that the journey to Taunton is less convenient and as such Watchet and Williton (together with Minehead) act as primary destinations for meeting the daily needs of their communities and the needs of their surrounding hinterlands. It is therefore clear that Williton and Watchet perform very different functions to Bishops Lydeard and Wiveliscombe and this should be reflected in the settlement hierarchy. This point is reinforced by the following text from paragraph 2.1 of the WSLP which states that "*a large, thinly populated hinterland looks mainly to the relatively self-contained main settlements of Minehead / Alcombe, Watchet and Williton for its everyday services.*" Paragraph 5.1 explains that Watchet and Williton, together with Minehead, "*will be the centres of a thriving and increasingly varied local economy within West Somerset*". Conversely, the Taunton Deane Core Strategy TDCS does not place this level of importance on the role of Wiveliscombe and Bishops Lydeard.

This difference in role and function of the settlements is also reflected in the strategic policies of the WSLP and TDCS. While the TDCS sought to direct only 200 new homes to Bishops Lydeard and Wiveliscombe over the plan period, the WSLP sought to direct 515 homes to Watchet and 635 to Williton. This is a clear indication of the greater strategic role of Williton and Watchet when compared to Bishops Lydeard and Wiveliscombe.

Unlike Minehead, Watchet and Williton are not subject to overriding physical constraints that preclude their future growth and there is strong interest from developers for sites at these settlements. This can be seen by the numerous planning applications that have come forward (and approved) at Watchet and Williton since the adoption of the WSLP.

In light of the issues raised above, it is considered that Watchet and Williton should be positioned in a higher tier of the settlement hierarchy that better reflects their role and function. With this in mind it is recommended that they are elevated to tier three (Major Rural Centres), either in place of, or together with, Minehead.

Due to the more limited respective roles of Bishops Lydeard and Wiveliscombe it is recommended that these villages be positioned at a level below Watchet and Williton.

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)?

Answer – Yes. It would seem appropriate for Watchet and Williton (and perhaps Minehead) to be seen as associated settlements.

Both Williton and Watchet each provide a range of complementary services, facilities and job opportunities. The close proximity of the two settlements and the convenience of travelling between the two (whether by car or other means), means that they effectively combine to meet the daily needs of their communities and their surrounding hinterlands. For this reason and the reasons highlighted above, it is considered that Watchet and Williton should be positioned above Bishops Lydeard and Wiveliscombe in the settlement hierarchy.

With this in mind it is recommended that they are elevated to tier three (Major Rural Centres), either in place of, or together with, Minehead.

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?

Answer – Option B is the most appropriate option. The strategy for housing distribution should seek to ensure that sufficient new homes are delivered in the areas in which the need is generated. Insufficient delivery of new homes in west Somerset would exacerbate existing issues relating to housing availability, affordability, loss of services, and ageing population.

It is understood that the Council has undertaken a preliminary assessment of various options for the way in which future housing growth could be distributed across the plan area, measuring them against a set of nine criteria (relating to the Council's objectives and sustainable development). The Issues and Options Paper presents three of these potential options, which scored most highly in the assessment.

It is essential that the development and investment needs of west Somerset's communities are not forgotten now they share a council area with Taunton and Wellington. One of the main aims of the WSLP was to rectify many years of underdevelopment in the district, which led to significant issues relating to housing availability, affordability, loss of services, and an ageing population. The new Local Plan must also have this objective.

The housing, economic and other needs of west Somerset cannot be met by siphoning development away to Taunton and Wellington. The distance between these areas is too great for west Somerset to experience any tangible benefit from such an approach. Instead there needs to be recognition in the Local Plan that the area it covers remains geographically fragmented into two areas and so it must apply a strategy that best serves the needs of both. This means that the housing, economic and other development needs of west Somerset's communities should be provided for within west Somerset. This would essentially represent a continuation of the existing distribution strategies in the WSLP and the TDCS (i.e. Option B). Significantly, this option also scored most highly against the sustainability criteria.

There is however a need for the new distribution strategy to take account of the significant constraints to future development at Minehead. As with the WSLP, any strategy that relies heavily upon Minehead for housing delivery is likely to fail and so the Council is encouraged to consider alternative locations in west Somerset to accommodate any residual need. A significant proportion of this need could be redirected to Watchet and Williton, where numerous sites are now coming forward. A smaller proportion could also be redirected to villages such as Washford and Carhampton, which have good links to the larger settlements but are also relatively well served by their own services and facilities.

In section 5.2.2 the Issues and Options document comments that Minehead, Watchet and Williton are not currently delivering as much housing as planned. The reasons for under delivery at Minehead have already been discussed above. The allocated sites at Williton and Watchet are coming forward and it is reasonable for the Council to view these sites as being deliverable within the plan period. Additional commentary on the specific circumstances of each site has been provided to the Council under separate cover.

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?

Answer – Settlement boundaries should be removed in favour of a criteria based policy approach linked to the settlement hierarchy.

Settlement boundaries are an outdated and unhelpful mechanism by which to judge the sustainability credentials of a development proposal. The emphasis should not be on whether a proposed development is positioned on the correct side of an arbitrary line, as this approach simply prevents any genuine consideration of whether it does (or does not) represent a sustainable form of development. Rather than judging sustainability based on which side of a line a site sits, it should be judged through consideration of issues such as: access to jobs, local services and facilities; the needs of the local community; energy efficiency; design quality; impacts upon heritage, landscape and townscape settings etc. Relying on settlement boundaries to control development effectively rules out any assessment of genuine sustainability.

Topic Paper 2 suggests a concern that this type of approach could lead to overdevelopment in smaller settlements surrounding Taunton and Wellington where market demand is strong. This concern is unfounded as sustainable development can effectively be managed through the use of criteria based policies which reflect a settlement's position within the settlement hierarchy. These criteria could be tailored to reflect each tier of the hierarchy.

This is broadly in line with the approach taken by the WSLP, which does not apply settlement boundaries. In the case of the primary and secondary villages, policy SC1 sets general parameters to limit the amount of new housing that may be developed within a given time period i.e. allowing up to a 10% increase in a settlement's total number of dwellings over the whole plan period, of which only 30% of this increase may occur in any five year period. Within this overarching strategy, the policy also outlines criteria that must be satisfied for development to be considered acceptable. If this type of approach is applied in the new Local Plan then there is no reason why the villages surrounding Taunton and Wellington should be subjected to overdevelopment over the plan period. This concern could be further mitigated through the allocation of small sites for housing development at those villages where a certain amount of growth is deemed appropriate.

There are also significant drawbacks to the use of settlement boundaries, which result as a consequence of their overly simplistic nature.

- Applying a blanket ban on development outside of settlement boundaries increases pressure on sites within the settlement. This pattern of development can erode the historic character of the settlement, particularly in villages.
- It is often the case that sites outside, but adjoining settlement boundaries are better related to services and facilities than sites within the boundary. In such situations settlement boundaries actually discourage the more sustainable forms of development.
- Although policies may allow for exceptions sites outside, but adjoining settlement boundaries, the reality is that this approach has actually led to a severe decline in the delivery of affordable homes at rural settlements. This in turn has resulted in issues relating to affordability, which in turn has created increasingly ageing populations in rural settlements.
- Settlement boundary policies are not sophisticated enough to take account of community needs.

For these reasons it is strongly recommended that the Local Plan applies well-considered criteria based policies, which will allow for the needs of rural communities to be met in a sustainable way, while ensuring that their rural character is not undermined.

Question 12a: The Coastal Strip – Do you have any comments on these policy approaches?

The Wyndham Estate supports the suggested policy approaches with regards to enhancing the local economy along the Coastal Strip, including support for new employment sites at the key towns, support for the tourism industry and support for the enhancement of waterfront sites at Minehead and Watchet.

I trust you will find this response useful in informing and shaping the emerging Local Plan. If you require any further information on any of the matters discussed above, then please do not hesitate to get in touch.

I look forward to hearing from you soon.

Yours sincerely



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Associate – Planning