

From: [Simon Collier](#)
To: [Strategy](#)
Subject: Vistry Homes
Date: 16 March 2020 11:13:07
Attachments: [image002.png](#)

Dear Sir/Madam

Please find attached two sets of representations on behalf of Vistry Homes.

These are being emailed to you as we have not been able to submit comments online due to the maximum word limit and as we are including plans.

Please acknowledge safe receipt by return of email.

Yours faithfully,



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

March 2020

REPRESENTATIONS ON BEHALF OF VISTRY HOMES LTD (Church Road, Trull)

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 plan making process is the appropriate time to consider how Taunton's highway infrastructure may need to be improved to better accommodate the required growth of the town. This was not properly addressed for the current plan period within the Core Strategy and should be an important element of the new plan. All options for doing so should be explored and tested as it is unrealistic to expect the major shift in travel behavior to public transport that the Core Strategy was reliant upon. The economy of the town will suffer without a robust strategy for improving the town's highway network.

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.

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)?

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Distribution of housing

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?

A strategy which continues to focus growth at Taunton would be supported given the clear benefits of locating development close to existing services and the new infrastructure planned within the consented urban extensions.

Question 2d/1-4: Do you have any comments on these policy approaches?

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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 demand to outstrip supply.

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*".

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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.

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Economic Growth

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?

The consultation paper identifies a current reliance on public sector jobs, a lack of recent investment from the private sector and economic growth in Taunton not keeping up with nearby towns.

We support the option of delivering a shift towards a significant increase in overall job numbers, including higher value jobs. The alternative is likely to result in the local economy stagnating and business investment in the area continuing to go elsewhere.

Better use of employment sites

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?

Employment sites identified in the current plans should be reviewed, as is required by the NPPF, so that those that are kept are done so because they remain appropriate and those that are not appropriate can be considered for alternative uses. This process should consider the need for new sites as well in order to drive the economic growth strategy.

Vitality of town centres

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

No comments at this stage.

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 vary 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.

Question 6b1-6b/5: Do you have any comments on these policy approaches?

No comments at this stage.

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?

The Council undertook an assessment of its Green Wedge designations in 2015. The report associated with that advises that Green Wedges have been protected through policy in Taunton Deane since the East Taunton local Plan publication of 1991 and that the policy wording has changed little during that time.

The Council's 2015 report contains very little detail and certainly no site specific commentary on the extent to which the boundaries have been interrogated. There is no evidence that the land requirements of the Green Wedge have ever been properly assessed by the Council at a site specific level, and we consider it essential that this is corrected through the preparation of the new Local Plan.

We would encourage the Council to robustly review all parcels of land that fall on the edges of its Green Wedges to assess whether it is appropriate or necessary for them continue to fall within these designations. There are a number of instances where land has been included within such designations despite making very little or no contribution towards the objectives of them. This results in land which is suitable for development being blighted unnecessarily and constraining the supply of land which can contribute towards maintaining an appropriate supply of development land. Potential for site allocations, infill, rounding off and other small scale site opportunities in sustainable locations should be fully explored on this basis.

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, to be replaced by criteria based policies.

Question 8b/1- 8b/2:

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

8b/3-8b/7

No comments at this stage.

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.

Key issues for Taunton

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

Pre-application dialogue could be more positive and supportive of investment town centre sites in order for the policy objectives to be followed through to the development management stage.

Question 10b/1 – 5

No comments at this stage

Question 10b/6 -

Opportunities for extending the boundaries of the new garden communities should be considered in order to deliver further sustainable growth close to already planned infrastructure, services and facilities.

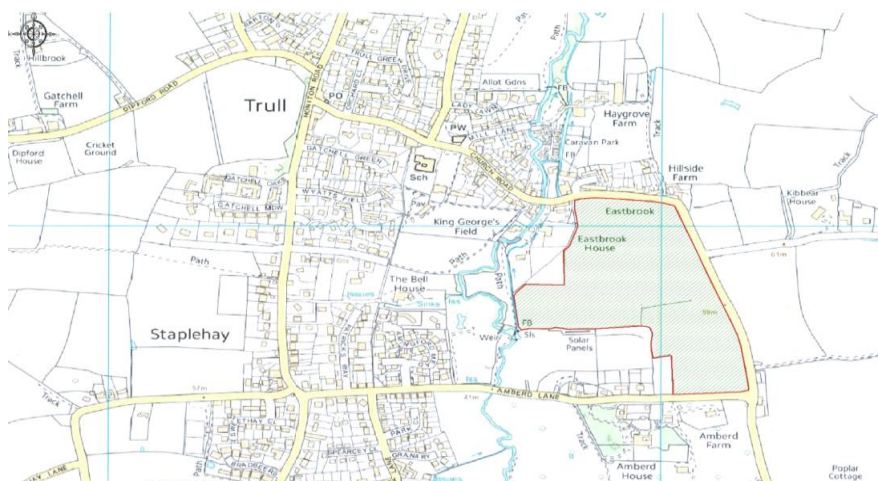
Questions 10b/7 – 9

No comments at this stage.

Question 10b/10 –

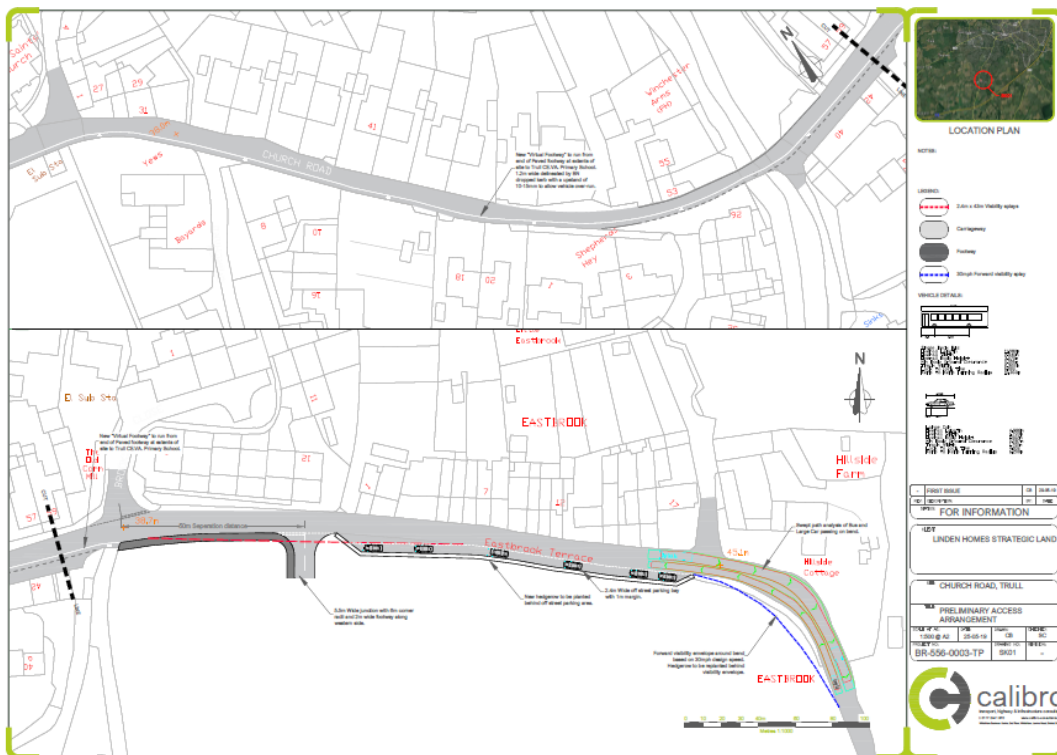
The green wedges have an important function but as we have explained in response to question 7b, there are a number of instances where land has been included within such designations despite making very little or no contribution towards their objectives. We consider it a very important part of the plan making process that the boundaries of the Green Wedges are robustly reviewed to identify whether land which has historically formed part of them sensibly needs to remain a part of them, or whether as part of the process of identifying suitable sites for development, such land would be more appropriately considered for development without undermining the role or function of the wider Green Wedge.

Vistry Homes have an option on land at Church Road, Trull. The site extends to 9.8 hectares and is shown edged in red on the plan below.



While the site falls within the current Green Wedge, its location is very well located the existing built form and the services and facilities of Trull. The eastern boundary and southern boundaries of the site benefit from some mature hedgerows that limits the visual impact while also bordering Amberd Lane and Church Road which provide a strong physical boundary to define the future extent of the village. The site represents an opportunity to round off development in Trull, provide housing is a highly sustainable location in a manner which would not undermine the purpose of the Green Wedge.

The site benefits from good frontage onto Church Road which is an adopted public highway. Colibro Transport have confirmed that there is scope to achieve an appropriate access from Church Road as is shown on the plan below. A new access at Church Road would allow the existing parking congestion to be alleviated by widening the lane opposite the existing cottages. A new footpath linkage is proposed using a “virtual” footpath design. A further footpath link can be made through the scheme to provide a circular walk around the village between existing footpaths T/21/2 and T21/7.



It is considered that the site is capable of delivering circa 150 dwellings (97 market units, 53 affordable units - 35% policy compliant). This estimate reflects the intention that open space would be integral to the scheme and structural planting could be provided on the higher slope on the south-east boundary.

Key issues for Wellington

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

No comments at this stage.

Key issues for the coastal strip

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

No comments at this stage.

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March 2020

REPRESENTATIONS ON BEHALF OF VISTRY HOMES LTD (Higher Comeytrowe Farm)

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

8b/3-8b/7

No comments at this stage.

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.

Key issues for Taunton

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

Pre-application dialogue could be more positive and supportive of investment town centre sites in order for the policy objectives to be followed through to the development management stage.

Question 10b/1 – 5

No comments at this stage

Question 10b/6 -

Opportunities for extending the boundaries of the new garden communities should be considered in order to deliver further sustainable growth close to already planned infrastructure, services and facilities.

Vistry Homes have an option on land at Higher Comeytrowe Farm (SHLAA site TAUN013). The site forms part of the Comeytrowe/Trull urban extension which is identified within the Taunton Deane Core Strategy 2011-2028 (adopted in 2012) and subsequently allocated by Policy TAU1 of the Site Allocations and Development Management Plan (adopted in 2016).

Vistry Homes are committed to developing the site for housing in accordance with its Development Plan allocation at the earliest opportunity. However, as the Council will be aware, access to the site is to be provided from the remainder of the urban extension which is controlled by the Comeytrowe Consortium and subject to outline planning permission (Ref: 42/14/0069) for mixed use development.

Condition 29 of that outline consent requires the Consortium to submit and agree with the Council a phasing programme for the provision of access to the boundary of Higher Comeytrowe Farm and for the development to thereafter be carried out strictly in accordance with the approved details and programme. This is clearly a very important factor in the timing of the delivery of development on Higher Comeytrowe Farm but now that the Consortium's development is very close to being commenced (with reserved matters applications for the first phase being considered by the Council) the delivery of it would certainly appear to be achievable in the current plan period.

Vistry Homes is keen to work with the Council in seeking to deliver housing on the site as soon as is practicable. Initial masterplanning work which Vistry Homes has undertaken indicates that the site could be capable of achieving a housing development of between 200-250 dwellings, which is in excess of the yield previously indicated within the SHLAA.

In addition, the land which Vistry Homes has under option extends beyond the boundaries of the allocation, which could provide a further opportunity to provide additional housing (circa 250 dwellings) served by the infrastructure being provided within the wider urban extension. The full extent of the land Vistry Homes has under option is shown coloured in blue on the plan below.



Questions 10b/7 – 9

No comments at this stage.

Question 10b/10 –

The green wedges have an important function but as we have explained in response to question 7b, there are a number of instances where land has been included within such designations despite making very little or no contribution towards their objectives. We consider it a very important part of the plan making process that the boundaries of the Green Wedges are robustly reviewed to identify whether land which has historically formed

part of them sensibly needs to remain a part of them, or whether as part of the process of identifying suitable sites for development, such land would be more appropriately considered for development without undermining the role or function of the wider Green Wedge.

Key issues for Wellington

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

No comments at this stage.

Key issues for the coastal strip

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

No comments at this stage.