

From: [Bryant, Nick](#)
To: [Povall, Sarah](#); [Kirby, Paula](#)
Subject: Wiveliscombe Civic and Historical Society
Date: 17 February 2020 10:25:55

Hi both,

I don't know if this one will have come through separately but just in case...

Nick

Nick Bryant
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From: Pauline Homeshaw [REDACTED]
Sent: 14 February 2020 15:23
To: Bryant, Nick <N.Bryant@somersetwestandtaunton.gov.uk>
Subject: Response to Issues and Options Document

Dear Nick

I attach our response to the Issues and Options document which we have seen and studied. We also plan to attend the consultation next Thursday here in Wiveliscombe.

Many thanks

Pauline Homeshaw
Chair – Wiveliscombe Civic and Historical Society

WIVELISCOMBE CIVIC AND HISTORICAL SOCIETY

...IN TOUCH WITH THE PAST, LOOKING TO THE FUTURE

c/o The Community Office
The Square
Wiveliscombe
Somerset
TA4 2JT
14th February 2020

Nick Bryant
Head of Strategy
Somerset West and Taunton Council
The Deane House
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Taunton TA1 1JH

Dear Mr Bryant

COMMENTS ON SW&T LOCAL PLAN 2040 'Issues and Options document' January 2020.

Thank you for the opportunity to respond to your above document. The Society would wish to make the following comments at this stage but would reserve the right to add or amend to the points made as the Plan progresses.

Objective 1: Carbon Neutrality

General: It should be made clear whether your proposals for new development include commercial as well as residential properties as there will be different issues arising to meet this objective (eg the difficulty in reducing heat loss from a warehouse as opposed to a residential unit).

A policy to reduce CO2 emissions through embodied energy of the building materials should be incorporated together with reuse/recycling of building/construction waste. This area is particularly important as the authority has declared a climate emergency.

A policy requirement should also be included in any design policy to ensure that all new dwellings have a charging point for electric cars, thus contributing towards the Governments target of zero carbon and electric car use.

Question 1a: Support zero carbon by 2025 in all new development whilst minimising the opportunity for offsetting. Note: TDBC under BREAMM and Code for Sustainable Homes adopted a sliding scale towards a 2016 target for

changes to Building Regulations to ensure zero carbon from all new homes by 2016. (This was subsequently watered down by the 2010 Government). The building industry has therefore had plenty of time to adapt and change practices, including their supply chains. 2025 is therefore a realistic and necessary timescale.

Question 1b: This should be a hybrid policy, allocating specific sites and having a criteria based element for additional low carbon and renewable energy infrastructure.

Objective 2: Sustainable locations

The Society supports the Objective whilst pointing out the following anomaly:

General: Objective 2 seeks to strengthen the self containment of all our towns. Previous plans utilised 1991 and 2001 census data to assess existing self containment. These figures should be published as a benchmark from which to assess success of policies over this time (including the 2011 census) and to guide new policy formulation.

With regard to Wiveliscombe, we would suspect that since Sandys Moor was allocated to both allow decanting of businesses from Ford Road and to balance new residential allocations with additional new, local employment opportunity, that self containment has greatly declined, contrary to existing and proposed Plan objectives. This fact was raised by the Society at the March 2019 Committee when the residential use was approved on Sandys Moor. These figures for 1999, 2001 and 2011 should be clearly set out for the next stage of the Plan preparation together with more up to date data on local housing and employment growth to inform both the public and the policy evidence base.

Question 2a and b: No objection to the specified tiers but with the committed growth at Williton/Watchet it would make sense to put them in a higher tier than Wiveliscombe.

Question 2c: Any additional growth should be targeted towards Taunton, Wellington and Minehead as these towns are the local focii for goods, services and transport links.

It is noted that under the Governments new methodology, the SW&T area has more housing commitments and allocations than required for the Plan period. In addition, as Wiveliscombe already has in excess of 50% additional housing commitments than specified in the Core Strategy to 2028, it compounds the argument to make no more allocations in the 10 Parishes area in the new Local Plan. Growth in this and other rural areas should be confined to exception sites for affordable housing and infill within settlement limits.

Objective 3: New and affordable homes

General: Again, the Society notes that the document acknowledges that around 702 new dwellings per year are required, totalling 14,040 over 20 years whilst 14,088 are committed. In addition, windfall and further sites are identified as developable.

The Society would ask SW&T for clarification as to whether the additional 'developable' sites would constitute future allocations? No additional allocations should be made within Wiveliscombe for reasons specified above as well as landscape impact and infrastructure issues.

Option 3a: The Society supports the retention of a 702 dwellings pa target and not an increase through additional allocations. Any 'shortfall' can be made up through exception sites, other windfall within settlement limits or higher densities (eg in town centre).

The society does not support new residential allocations to support additional economic growth. SW&T/TDBC has already redeveloped or committed a number of employment allocations and existing land for additional residential use (eg Sandys Moor, Norton Fitzwarren and Monkton Heathfield). One must assume a level of competency was used to ascertain that these sites were already surplus to employment growth requirements.

Option 3b: No comment.

Option 3c: All new homes should meet certain accessibility standards (eg level thresholds) but support option ii) to ensure a proportion of all new homes on any one site should be fully accessible.

Option 3d: If a percentage of homes on a housing development were self build then developers would simply argue viability and reduce the percentage of affordable homes. Therefore, the Society would only support self build as infill or in rural areas as a means of cross-subsidising social housing on exception sites.

No comment on question 3e.

Objective 4: Economy

General: The employment and economic activity rates in the (former) Deane are broadly in line with national rates. Therefore to increase housing supply simply to attract higher paying jobs would be counterproductive; the housing figures are already sufficient to meet government methodology, further greenfield sites would be developed prior to brownfield regeneration and there is no guarantee people moving into the additional houses would be employed only in the higher paying jobs and may actually commute out of the district for work, further decreasing self containment.

Option 4a: Support i). to increase the proportion of higher value jobs within existing overall job numbers. There are already strategic sites which could be

utilised for such an approach (eg J25, Chelston, Monkton and within the town centre).

Paragraph 3 of section 5.4.2. This is either poorly worded or misinformed: Why should remaining employment sites be only of the highest quality? There has always been a requirement to retain lower value land for bad neighbour type uses (eg repair workshops, builders yards etc).

Option 4b). First, it would be important to clearly define 'employment sites'. Some may be allocated but others may already exist and be too small to form an allocation. Likewise, definition of employment uses should also be made (eg class B only?), whilst certain elements of Class B may not be suitable on some employment sites (eg office use replacing warehousing in non sustainable locations).

The Society supports the general retention of local employment sites. This aides local employment opportunities and reduces the need for commuting. Any proposed loss should be strictly controlled by criteria. Any loss of larger sites (or partial) should be done through the evidence base of the Plan only (which should include viability assessments to inform the allocation).

The Society considers that support for alternative uses should not necessarily be forthcoming. Government policy allows for de-allocation of sites, to remain greenfield for example. Likewise, some existing employment uses/sites may not be in a sustainable location for alternative (eg residential) use so a strong, criteria based policy would be required.

Objective 4c/7 Whilst town centres should be allowed to diversify to respond to change it is important to define and retain a retail (Class A1) core, to protect the centres primary function whilst allowing better diversification outside of this core.

Objective 5: Infrastructure

General: The Society strongly urges the Council to halt management agreements and covenants requiring developer agreements over otherwise PD rights on new housing developments which has been proven to reduce or remove future resale potential, for example, the annual maintenance sum of open spaces. Residents already pay for maintenance of open space through their Council Tax so to retain management agreements means residents in new estates pay twice (whilst those in older houses only pay through their Council Tax). Likewise, such infrastructure can be paid for through other mechanisms such as CIL, and/or S106 agreements which always used to be the case.

Option 5a. This is a poorly worded question to answer and need not be 'either or's'. For example, the level of affordable housing could increase through non Plan policies such as additional government funding streams for new Council housing. Likewise, viability of developer contributions towards the level of affordable housing could be 'freed up' if other funding streams become

available for infrastructure (eg relief roads, flooding etc) as has been the case in some past strategic site allocations. The Society therefore suggests strong viability testing of potential allocations (including non residential) at the outset to ensure deliverability without later on reducing requirements or allowing more money-spinning uses to maintain higher developer profits.

Objective 6: Connecting people

General: The Society would support improved broadband speeds by whatever means throughout the rural area. This is all the more important with the increase in home working, which also reduces the need to travel but in some areas is increasingly difficult due to slow internet connectivity.

Objective 7: Natural and historic environment

General: It is noted that this section provides no 'Options' although the Society supports the points raised in Question 7b. In addition, (5.7.3) it is also important for the plan to support the setting of settlements even if they are not within or adjoining a protected landscape as there may be for example, local features and views worth preserving or to prevent coalescence of settlements or ribbon development in the countryside.

'Design' appears to be lacking from your consultation. Therefore the Society has included our comments under this section. First, the Council should fully adopt in policy the Governments October 2019 Design Guide for Residential Development. Further, where detailed planning is yet to be granted on allocated sites there should be a policy requirement that the local community manage the process with the assistance of the local Council, in order to ensure local distinctiveness and appropriate detail and content is included. Finally, street trees are proven to increase residential quality, wellbeing and reduce the localised impact of climate change. These should be included within all residential allocations. The County Councils maintenance costs have always been excessive in comparison with other authorities and such matters can also be part funded through other sources as well as developer contributions.

Objective 8: Coastal and rural communities

General: The protection of rural services is required in order to sustain rural communities. The existing development plan suite contains policies including Core Strategy CP3iv. preventing loss of services such as public houses and shops unless independently verified that continuation is not sustainable. This is complimented by the Councils 2014 Technical Note "Policy Guidance for change of use of rural service provision and conversion of existing buildings" which, amongst other criteria requires an agreed viability assessment and marketing strategy. This approach must be sustained in future policy.

Option 8a. The Society strongly supports settlement boundaries across the whole district, beyond which would be regarded as open countryside where strongly restrictive policies would apply. However, a review of existing

settlement boundaries would be recommended since some settlements now lack the range of services which initially warranted their definition as a village rather than open countryside.

Objective 9: Residents Wellbeing

General: Objective 9 should include a sentence on listening to the needs and knowledge of the local communities in both Plan making and decision taking.

Option 10a. (Taunton town centre).

General: The term 'Housing' should not be used unless specific to that form of development. In the town centre, flats/apartments are more likely thus, to avoid confusion 'residential' should be used as a general form.

With regard to Option 10a, the Society supports option ii); taller buildings, subject to impact.

With regard to 'additional policy approaches' the Society generally supports these additional policy approaches, however, regarding 10b/2, a redefined retail core needs to be clearly drawn and the accompanying policy needs to strictly control non Class A1 uses within it in order to retain/maintain the critical mass and footfall required to sustain the centres vitality and viability. This in turn will allow the non core to diversify to provide a wider, sustainable town centre offer.

In addition, no mention appears to control out of centre retail; in terms of both a sequential approach to proposals and range of goods acceptable. Without this, the retail function of the centre will continue to decline.

Other Comments

It is noted that very little is mentioned of Wiveliscombe. As previously stated, the Society does not support further residential allocations as the residential target for the period to 2028 has already been breached by around 50% and the SW&T acknowledges that under government methodology future targets have already been met across the district.

However, in certain circumstances the Society would accept additional development through exception sites for affordable housing, possibly cross subsidised by an element of self build. It is also anxious to increase self containment so policies for small, edge of settlement low value employment sites may also be accepted in line with existing plan policies and environmental considerations.

In addition, as the plan progresses the issue of the lack of car parking should be addressed in policy. For example, the Croft Way residential site can now be potentially developed via access through a relocated children's centre (which has structural issues). This provides the opportunity to reallocate Croft

Way for residential and to include parking for residents not living within the allocation, thus freeing up the existing car park in Croft Way for visitors. Again, the Society thanks the Council for giving the opportunity to comment at this early stage. We would appreciate acknowledgment of receipt and to be kept fully informed of issues as the Plan progresses.

Yours sincerely

Pauline Homeshaw
Chairman Wiveliscombe Civic Society