

# **Taunton Deane Borough Council**

**Executive – 15 October 2008**

## **Report of the Forward Plan Manager**

**This matter is the responsibility of the Executive Councillor for Planning and Transport, Councillor Coles**

## **Draft Revised Regional Spatial Strategy for the South West incorporating the Secretary of State's Proposed Changes**

### **1.0 Executive Summary**

1.1 The Borough Council objects to the following parts of the Proposed Changes:

- The deletion of so much of the previous content that reflected the local distinctiveness of the region in chapters 2, 3 and 4
- The deletion of all the sub-regional infrastructure proposals
- The undeliverable annual average dwelling requirements proposed for Taunton and lack of phasing to give a lower rate for the first decade of the plan period
- In the context of the limit to the capacity of Taunton to accommodate additional growth, the inflexibility of the RSS to allow Wellington to have a greater role in accommodating growth
- The potential harm to the self-containment of Taunton from a housing requirement that exceeds the potential for employment growth
- The deletion of the proposals for a Second Strategic Route
- The inaccuracies in relation to the Taunton HMA text, policy and key diagram

### **2.0 Purpose of Report**

2.1 To respond on behalf of the Borough Council to the consultation on the Draft Regional Spatial Strategy Proposed Changes. The deadline for response is 24 October, 2008.

### **3.0 Background**

3.1 Following the Examination in Public into the draft Regional Spatial Strategy (RSS) in 2007, the Panel Report was published in January 2008. In July the Secretary of State published the draft RSS Proposed Changes for consultation.

3.2 In March 2008 the Somerset Strategic Planning Conference (SSPC) wrote to the Secretary of State expressing strategic concerns about the Panel report (see Appendix A).

- 3.3 Borough and County councillors were briefed on 21 August about the RSS Proposed Changes and the implications for Taunton Deane's Core Strategy. It has also been considered at the LDF Steering Group. In September the SSPC agreed a consultation response that repeats and elaborates the strategic concerns raised previously.

#### 4.0 **Response**

- 4.1 It is disappointing that the Sec of State does not appear to have listened to and understood the concerns that we expressed to her following the publication of the Panel Report, namely:

- Deliverability and phasing of the growth – Baker's SAS report provides evidence from house builders that Panel level of growth undeliverable at Taunton – the draft RSS proposed a lower annual housing rate for the first decade than for the second, but the Panel and the Proposed Changes require a rate of 900 dpa for the whole plan period – this is undeliverable and will increase the risk of panning by appeal on unplanned less sustainable sites.
- Sustainability of increasing Taunton's growth – increasing housing growth to a level that is unlikely to be matched by the growth in employment is likely to lead to out-commuting and a reduction in our currently high level of self containment – coupled with inflexibility to distribute what is undeliverable at Taunton to sustainable market towns such as Wellington (policy B settlements).
- Infrastructure provision to provide for growth had been agreed by the Panel and their Report refers to "the 50% housing growth in the HMA proposed for Taunton in draft RSS would be the highest proportion shouldered by any SSCT" (Panel Report 4.6.16) – the Proposed Changes have deleted all the sub-regional infrastructure proposals.
- Downgrading of Second Strategic Route in the Panel Report - now cut completely in the proposed Changes – the A358 link between the M5 and the A303 was agreed by Alistair Darling as vitally important for both east/west and north/south intra-regional routes.

- 4.2 It is also disappointing to see so much that reflects the distinctiveness of the south west deleted from the RSS. Inspectors have found LDFs unsound if they fail to reflect local distinctiveness. This criticism could now be levelled at the RSS Proposed Changes. The deletion of chapter 2 and cuts to chapter 3 (including the deletion of strategy emphases map 3.1) and chapter 4, raise the question as to whether we still have an effective spatial strategy. There is also concern that there is not a clear evidence base for much of the new content in the Proposed Changes. The replacement of high standards for sustainable construction in policy G and renewable energy in policy RE5 with a reiteration of lower national standards is regrettable in view of all the work the region did on this (to which the Borough Council contributed) and will fetter our ability to reduce carbon emissions in major new developments.

- 4.3 The Panel had accepted 2.8% pa average gross value added (gva) for the region, whereas the Proposed Changes suggest 3.2% gva growth over the 20 year period. This is not considered to be a realistic planning assumption on which to base regional housing provision. The concern is that housing delivery could significantly exceed the growth in jobs. This would adversely affect the self containment and therefore the sustainability of settlements. This represents a predict and provide approach rather than the plan, monitor and manage approach espoused by government.

### **Taunton HMA**

- 4.4 Proposed Changes p.91 para.4.1.48 just refers to two mixed-use urban extensions for Taunton, which is misleading. It should refer to two strategic urban extensions to the NE and SW of Taunton and a number of smaller urban extensions of up to 1,500 homes mainly around the northern edge of the town. Again it is disappointing in the context of all the work on the Taunton Urban Extension Study and the Taunton Sub Area Study that the supporting text has been cut to the point where it no longer gives any sense of local identity. Working in partnership so much work went into the RSS and it really seems to have been wasted if the final RSS is to be so succinct that it fails to reflect the strategy that was agreed by all our local partners and stakeholders.
- 4.5 Proposed Changes Policy HMA6 Taunton SSCT, the first bullet point incorrect. An objection was made to draft RSS that '/ adjoining' should be inserted between 'Within' and 'Taunton's urban area'. The Panel Report corrected this error by making it clear that the 11,000 figure comprises 5,000 dwellings from the urban capacity study, 1,000 from the Local Plan at Monkton Heathfield and 4,500 dwellings in non-strategic urban extensions, mainly around the northern edge of the urban area. The wording should be amended to read 'Within/adjoining Taunton's urban area...'.
- 4.6 Proposed Changes Table 4.2 indicates for Taunton an annual average rate of 900 dwellings over the whole of the period 2006 – 2026. The dRSS phased the rate of housing development with a lower annual rate of 660 for the first decade and 740 for the second decade. The average annual rate of 900dpa for the whole of the plan period is undeliverable, bearing in mind that the figure for the decade 1996 - 2006 was 301 dpa. Following a workshop with house builders, the Taunton Sub Area Study (chapter 11) concluded that the maximum realistic delivery rate for Taunton is 780dpa.
- 4.7 In 2006/7 and 2007/8 Taunton delivered 251 and 402 dwellings respectively. RSS housing rates for Taunton must be phased in order to reflect both our existing base rate and the fact the RSS target represents a challenging 45% increase in Taunton's dwelling stock over the 20 year plan period. Also it usually takes about seven to eight

years between the allocation of a site in a plan and the completion of houses on the ground. There are several effects of unrealistic annual housing rates:

- failure to meet the RSS housing target in the early years pushes up the residual rate even higher for the remaining plan period;
- when the RSS replaces RPG10 we will no longer have a five year supply of housing land, which will increase the risk of planning by appeal on unplanned, less sustainable development sites, and
- less favourable outcomes for Housing and Planning Delivery Grant would adversely affect planning staff resources

It will therefore be essential that the RSS re-introduces phasing into the annual average net dwelling requirements, with a lower annual rate for the first decade of the plan period.

- 4.8 Following the 'Taunton Sub Area Study', Baker Associates were commissioned by Somerset to report on the 'Implications of ONS Household Projections for Somerset'. The study concluded that SSCTs have the greatest opportunities for employment and the greatest levels of accessibility to services but they also have limitations on their capacity to accommodate additional growth. Given the constraints on SSCTs and the scale of the step change in growth for Taunton in particular, Market Towns such as Wellington (category B settlements in the RSS) should have a greater role to play in accommodating the additional growth arising as a result of the revised ONS household projections. The concern is that the Proposed Changes will not allow a greater role for Wellington to accommodate growth that cannot be met in Taunton.
- 4.9 The problem is that whilst the Proposed Changes have increased the Taunton growth from 14,000 to 18,000 dwellings, the figure for the remainder of Taunton Deane (including Wellington) has only changed from 3,300 to 3,800 dwellings. This gives little or no flexibility in the LDF Core Strategy to enable Wellington to play a greater role in accommodating growth as recommended in the Baker's study.
- 4.10 Many other SSCT key diagrams have shown spot symbols for areas of search for as little as 1,000 homes (e.g Cheltenham and Gloucester). Given the scale of the non-strategic urban extensions, mainly north of Taunton, with a total of around 4,000 homes, it seems anomalous that the Taunton key diagram does not indicate any areas of search to the north of the town. The Taunton HMA diagram also shows spot symbols for Comeytrowe extending half way to Wellington, which is misleading and does not reflect the urban extension studies that informed the draft RSS. The diagram is also wrong in relation to the box suggesting that 11,000 dwellings will be within the existing urban area (see para. 4.4 above).

## 5.0 Conclusions

5.1 The Borough Council objects to the following parts of the Proposed Changes:

- The deletion of so much of the previous content that reflected the local distinctiveness of the region in chapters 2, 3 and 4
- The deletion of all the sub-regional infrastructure proposals
- The undeliverable annual average dwelling requirements proposed for Taunton and lack of phasing to give a lower rate for the first decade of the plan period
- In the context of the limit to the capacity of Taunton to accommodate additional growth, the inflexibility of the RSS to allow Wellington to have a greater role in accommodating growth
- The potential harm to the self-containment of Taunton from a housing requirement that exceeds the potential for employment growth
- The deletion of the proposals for a Second Strategic Route
- The inaccuracies in relation to the Taunton HMA text, policy and key diagram

## 6.0 Corporate Priorities

6.1 The Regional Spatial Strategy influences the scale of development, economic investment and transport infrastructure for each of the planning authorities in the south west, providing a basis for each council in the preparation of their Local Development Framework. It impacts on Project Taunton and every corporate priority.

## 7.0 Recommendation

7.1 It is recommended that this response be agreed and submitted to GOSW on behalf the Borough Council.

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