

18th June 2021
Our Ref: 21.9002

Tessa Dean,
Trull Neighbourhood Plan Group
Sent via email

Dear Tessa,

Neighbourhood Plan Group Consultation Response

Ref: 42/21/0004 - Application for approval of reserved matters following outline application 42/14/0069 in respect of the appearance, landscape, layout and scale for the erection of 166 No. dwellings on land at Parcel H1d, Comeytrove/Trull

Thank you for your consultation comments regarding the above planning application, received on 11th June 2021.

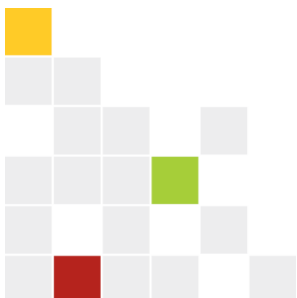
We would like to remind you that we are very happy to discuss directly any concerns you have regarding the development, and to explain the proposals further to make sure you fully understand the all of the technical details, which your letter seeks clarification on.

As requested, we have provide further information and clarification to the points you raise in your letter under the headings below:

- 1. The boundary for this application has not been decided. Different plans show significantly different lines, affecting, for example the spine road and the inclusion or exclusion of detention basins. No decision can be made on this application without clarity and certainty.*

The application is accompanied by a Location Plan (Ref: PL-TW-11 Rev H), which clearly show the application site edged in red. During the determination of the application, various amendments and improvements to the scheme have been made to the proposals to accommodate the comments of officers and statutory authorities. As part of this process, there have been minor changes to the boundary of the Reserved Matter submission. The latest suite of amended plans submitted in June to support the application have a finalised red line boundary, which provides clarity on the positioning of the roads and other infrastructure on site.

- 2. Wishes to see more trees planted on the development.*



The submitted Planning Statement confirms that structural tree planting has already been approved as part of the strategic infrastructure Reserved Matters submission for the development and therefore has been deemed appropriate by the Council. This permitted substantial areas of new public open space, including parks & gardens, children's play areas, allotments, orchards, and the planting of nearly 500 new trees and over 6 acres of new native British Woodland for existing and future residents to enjoy.

3. *The application was not considered to accord with Neighbourhood Plan Policy F1: Reducing Flood Risk for the following reasons:*

- *This application does not have an acceptable SUDS scheme.*

In agreement with the Lead Local Flood Authority, various SUDS are incorporated into the H1d proposals, such as wrapped permeable paving, private wrapped filter drains, swales/shallow grassed depressions, and water butts. The surface water is then attenuated in within the primary infrastructure Suds basins NA3a, NA3b and N6.

- *It does not have a s106 agreement for management and maintenance; in fact, for some locations, no possibility of maintenance.*

The SUDS have been designed in accordance with best practice and will be maintained appropriately. The primary infrastructure pond SUDS features will be maintained in accordance with the Surface Water Drainage Maintenance Plan dated 7th May 2021 submitted under Outline Planning Condition 13.

- *It does not fulfil Condition 13 of the outline permission, regarding the detailed surface water drainage scheme design. There is a need for detailed drainage plans showing how this development will connect into the strategic infrastructure.*

The drainage plans DR-4001 and 4002 are detailed and indicate drainage routing and catchments. They also show how the development areas will connect into the primary infrastructure SUDS ponds NA3a, NA3b and N6.

- *There are no site-specific data; no calculations demonstrating the capacity and contingency arrangements (noting that there are, on half the plans, no detention basins within this parcel, and with the exception of a drain and a limited filter strip, no parcel-specific features). This parcel is dependent on works being completed elsewhere, but with no commitments made.*

The parcel H1d AWP drainage statement makes very clear that the drainage from H1d connects to the primary infrastructure ponds NA3, NA3b and N6. Therefore the commitment made is that H1d will drain into these SUDS ponds. The hydraulic calculations for these ponds are contained in the Condition 13 Surface Water Drainage Strategy Report at Appendix D.

- *The supporting evidence of the extent of impermeable ground has still not been provided.*

The extent of impermeable areas are shown on the scaled plans DR-4001 and DR-4002.

- *There are no proposals for surface water flow or exceedance events. The original vague proposal was 'car parks', popular with residents' insurers.*

Exceedance events are dealt with in the Condition 13 Surface Water Drainage Strategy Report Appendix G.

- *The runoff from the site will at certain events, exceed 2 litres/second/hectare; predictions of frequency and volumes have not been provided.*

The discharge from the Suds ponds are limited to 2l/s/ha. The hydraulic calculations for the receiving ponds are contained in the Condition 13 Surface Water Drainage Strategy Report Appendix D.

- *There are no proposals for attractive water areas.*

The SUDS ponds will be contained within landscaped areas.

4. *The application was not considered to meet the minimal expectations of Neighbourhood Plan Community Action CA1: Flood Performance. Trull Parish is vulnerable to surface water flooding due to the shallow and relatively impermeable bedrock which results in rapid runoff. 'The impacts of the increasingly intense downpours driven by climate change, as well as population growth and urbanisation, will see the cost of the flood damage rise fivefold in the UK by 2050, up to £23bn a year.' (TNP)*

None of the development is located within a designated flood risk area.

5. *The application was not considered to accord with Neighbourhood Plan Policy H1: Sustainable Housing as no small scale renewable technologies (eg heat pumps, solar panels) are proposed despite the District Council having declared a climate emergency.*

The Energy and Sustainability Statement (Dec 2012, prepared by AES Sustainability Consultants) sets out the developer's commitment to sustainable development and Phase H1d's compliance with local and national policy.

As the Statement indicates, the climate emergency is recognised and in response a 'fabric first' approach is proposed to incorporate sustainable design that enables efficient energy performance that exceeds the Building Regulations. By utilising sustainable materials, resource-efficient products, promoting sustainable transport through e.g. on-site cycle storage and electric vehicle charging facilities, demand for energy (and associated CO2 emissions) throughout the development's construction and operational phases will be lowered. In this way, 'designing out' energy demand is a more effective approach to combat climate change when compared to renewable energy technologies, which are essentially implemented to offset unnecessary demand (see Figure 2. Energy Hierarchy on p9 of the Energy Statement).

6. *The application was not considered to accord with Neighbourhood Plan Policy H2: Housing 'in keeping'.*

The site has the benefit of Outline Planning Permission, and this reserved matters submission complies with the approved Design and Access statement, all the approved Parameter Plans and the approved Western Neighbourhood Design Guide for this part of the site. The proposals sit alongside the recently approved H1b parcel and as such continues the attractive architectural proposals for the site to continue the character and provide legibility for the wider development.

In terms of architectural response, the main street frontage continues the rhythm and repetition of red/orange brick semi-detached homes with buff brick detailing as set out in Parcel H1d. Rendered buildings are located at junctions and the entire route is lined with black metal estate style railings and formal hedgerows. This formality contrasts with the more informal and varied approach to the built form, detailing and landscaping along the residential streets beyond. The green edges contrast again, with large, detached homes set in a more irregular pattern, in buff brick and reconstituted stone, with hedgerows defining front gardens and clusters of tree planting to create a more informal green edge and reinforce the character of the existing mature vegetation. Overall, the proposals will echo the built form, materials palette and detailing used in and around Taunton, but deliver a distinctive and attractive new residential development for this site, set within the context of existing mature landscaping, and proposed new structural and ornamental planting, all as required by the outline planning permission.

7. *The application was not considered to accord with Neighbourhood Plan Community Action CA2: Internal Design Community Action because the application (it appears) fails to provide for wheelchair users and should be refused.*

Whilst the application submission provides 3 accessible homes (in accordance with Part M (4)2 of the 2010 Building Regulations). While the site is steeply undulating, the overall approach to design within the approved Outline permission and this RM submission is to create an inclusive and accessible environment for all. For instance, the approved Western Neighbourhood Design Guide for this part of the site ensures that any level changes throughout the site will where possible ensure gentle transitions in any stepping of buildings, with an overarching aim to deliver an inclusive and safe community.

8. *The application was not considered to accord with Neighbourhood Plan Policy EE2: Homeworking and Live/Work Development as it makes no provision for, and as designed, has no potential for, homeworking or live/work development.*

It is appreciated that provision for homeworking is important, particularly given the shift in office/homeworking during the pandemic. However, the proposed housing is considered adaptable for individuals to meet their work and home life needs where appropriate, for example converting a spare bedroom to a home office. Site infrastructure such as broadband will also ensure that the development makes suitable provision to enable homeworking; together with opportunities for flexible space within the new Local Centre.

9. *The application was not considered to address the issues within Core Strategy Policy CP 8: Environment*

The Ecology Note prepared by EDP submitted alongside the application supports that the impacts on the environment / ecology have been addressed through the approved outline planning permission and through the discharge of conditions relating to ecology (18, 19, 20 and 21) of the permission. This is also summarised in the supporting Planning Statement.

- C18 Wildlife Strategy – has been submitted within the RM application for the Western Neighbourhood infrastructure works (comprising Ecological Construction Method Statement (ECMS) and Landscape Ecological Management Plan (LEMP)) and relates to

the wider development, including parcel H1d. The strategy sets out relevant mitigation measures and details of proposed management to protect the ecological features of the site. It is also noted that the features of ecological importance throughout the Western neighbourhood development (such as habitats and net boxes) are largely outside Parcel H1d.

- C19 Ecological Management Plan – The submitted strategic LEMP sets out the proposals for maintaining and managing ecological habitats in accordance with the details of Condition 19 and confirm that the development will deliver a long-term biodiversity net gain.
- C20 Update Surveys – surveys have been ongoing at the site since 2012 and the latest update surveys took place in 2018 and 2019 as summarised in Protected Species Survey Report. Further update surveys will be conducted as the construction period continues as and when necessary.
- C21 Lighting Strategy for Biodiversity – a Lighting Strategy has been submitted as part of the Western Neighbourhood Infrastructure works application and covers parcel H1d. The strategy sets out the lighting specifications having accounted for sensitivity to species such as bats, dormice and badgers. Furthermore, H1d is not located in a strategic habitat corridor.

10. The application was not considered to accord with Paragraph 130 of the NPPF, as there is no evidence that the developers have attempted to improve the character of Taunton nor have they taken into account the Taunton Design Charter and Checklist or suggestions from the Placemaking Specialist.

As set out above, the site draws inspiration from in and around Taunton - the built form, the materials, and detailing, but establishes a new and distinctive character for this development at Comeytrowe as required by the outline planning permission.

Communication shows that whilst we have not managed to address every point made by the Placemaking Specialist, we have responded positively to most of the comments and together, the architectural and landscape proposals will deliver a high quality and attractive new residential environment, with character and legibility to assist with wayfinding and inspire community.

We hope that the above responses address your comments and satisfy any outstanding concerns relating to the application. Once again, if you would like to discuss any matters further, please get in touch.

Yours sincerely,



Lawrence Turner
Associate Director