



Campaign to Protect  
Rural England  
SOMERSET

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Paul Bryan

Please reply to:-  
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Forward Planning  
Taunton Deane Borough Council  
Deane House  
Belvedere Road  
Taunton

28<sup>th</sup> February 2010

Dear Sir,

### **Taunton LDF Core Strategy - response to consultation**

CPRE Somerset largely supports the policies put forward by the Council. It has the following concerns however, and would encourage the Authority to consider them.

#### **1. Protection and enhancement of the landscape**

We are pleased that a Landscape Character Assessment has been carried out to identify Taunton Deane's landscape character and that policy is to conserve and enhance this character. We are concerned however that many policies seem to pay little heed to this.

Taunton has a highly attractive farmed setting. This is understood in the LCA. A setting that it considers is largely in good condition. Although it appears to be robust, we would encourage the Authority not to take it for granted. We believe that policies are needed to ensure that farming remains the predominant land use and in particular, studies are required that look at how farming will be affected by the Taunton expansion proposals.

CPRE Somerset is concerned that the Core Strategy threatens some highly attractive and productive landscape. If this is developed, we consider that it will have a significant affect upon the setting of Taunton and lead to the decline in character of the remaining farm land, particularly the new "front" at the edge of the urban area. We are concerned that there are very few farms between Taunton, Bishops Lydeard, Cotford St Luke and Wellington and if the development goes ahead, those that remain are likely to move out of farming to urban fringe activities such as equine development and hobby farming.

If sites are to be developed around Taunton, we would urge the Council to look at the evidence presented in the recent and detailed Agricultural Land Classification and to avoid the "Best and Most Versatile" agricultural land. The future agenda sees local food production as important and CPRE believes that the Authority should modify its plans to adapt to this new situation.

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The Somerset Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

The LCA is not a tool for identifying where land should be developed but is a resource that allows further studies to take place. We are not satisfied that detailed Capacity and Sensitivity Studies have satisfactorily been carried out to identify the most appropriate locations for development. We would hope that public consultation on such a study would be carried out.

We understand that appropriate sites for expansion avoid visually prominent land. Whereas it is important that new development should not have a significant impact on the landscape setting, we consider that there are many other site characteristics that should also be considered. Good development can take place on high ground, as long as there is a good landscape infrastructure, as can be seen at Haines Hills. We do not understand why land to the east of Taunton, in areas of lower landscape value, have not been identified for development. We do not consider the reason of visual prominence satisfactory.

## **2. Positive development and not an apology.**

CPRE Somerset agrees that more housing is necessary. We believe however that it is important to make good places to live. Positive developments, that have a sense of place and identity, make good homes. Cotford St Luke is a good example of this and we encourage the Authority to look for similar sites that make a positive contribution to the landscape. We consider this more important than restricting locations on grounds of sustainability.

## **4. Phased development.**

Housing allocation identified in the RSS is very high. Since the figures were identified, the demand for housing has subsided. High levels of growth and therefore housing demand are unlikely to return. To reflect this we would encourage the Authority to resist the numbers required by the RSS and to look into the possibility of identifying phased development. Why should more sites be identified for development than are necessary?

## **5. Affordable Housing in rural areas**

It is noted that there is a severe shortage of affordable housing in rural parishes within Taunton Deane which needs to be addressed. It is therefore considered that affordable housing sites should be provided in a wider range of rural settlements than solely the defined 'rural centres'. Somerset CPRE does not believe that the 'exceptions policy' is sufficient on its own to deliver an appropriate level of affordable housing to ensure socially sustainable communities.

It is further suggested that within rural areas a lower threshold for affordable housing could be set to trigger a proportion of affordable dwellings. We would also support policies that encourage more self build units for local people in genuine need of affordable housing.

## **6 Design**

Development management policies should ensure the highest levels of design across the district. The following suggestions are made:

- The 'Design for Life' criteria should be enshrined into development management policies to ensure quality and consistency of development.
- Development management policies and Supplementary Planning Guidance on design should refer to the latest highway design guidance within the 'Manual for Streets'.

- Policies on housing density should not assume that higher densities are the most appropriate solution across the board. A range of densities should be provided with higher densities where the landscape impact is less severe and in areas with good public transport, services and infrastructure.

### **7. Green Infrastructure**

We do not consider green infrastructure policies appropriate to a rural town like Taunton. Taunton is fortunate in having good quality farmed landscape close to its centre. We believe that policies should encourage this to remain in farming. Farming conserves landscape character and heritage. It also provides food, the backdrop to recreation, places for wildlife to exist and for flooding to take place. It does this, for no cost.

Yours faithfully

A handwritten signature in cursive script that reads "Paul Bryan".

Paul Bryan  
Chairman