Land at South West Taunton
Planning Statement

On Behalf of Bovis Homes Limited, Mactaggart & Mickel Limited,
Summerfield Developments (SW) Limited and
Taylor Wimpey UK Limited

November 2014
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1.0 EXECUTIVE SUMMARY

1.1 This Planning Statement accompanies an outline planning application on behalf of Bovis Homes Limited, Mactaggart & Mickel Limited, Summerfield Developments (SW) Limited and Taylor Wimpey UK Limited (together the “Comeytrowe Consortium”) for a mixed-use urban extension of up to 2,000 new homes at Comeytrowe/Trull, to the south west of Taunton. The proposed description of development is:

“Outline planning application with all matters reserved, other than points of access, for a residential and mixed-use urban extension at Comeytrowe / Trull, including up to 2,000 homes; up to 5.25 ha of employment land; 2.2 ha of land for a new primary school; a mixed use local centre; a principal highway link road connecting the A38 and Honiton Road; and a new 300 space ‘Park and Bus’ facility.”

1.2 The starting point for the determination of the planning application is Policy SS7 of the adopted Taunton Deane Core Strategy (TDCS) (2012) Policy SS7, which states that:

“Comeytrowe/Trull is a broad location for a mixed use strategic urban extension for development after 2015 for between 1,000 and 2,000 dwellings up to 2028. A masterplan will be prepared to identify the full long-term potential for comprehensive development in this south west sector of Taunton and the infrastructure required to provide a sustainable new community. The masterplan will phase and co-ordinate development to provide the necessary physical, social and green infrastructure. A piecemeal approach to development in this area before a comprehensive masterplan has been agreed will not be permitted.”

1.3 The application proposal meets all the requirements of Policy SS7:

- The application site is located within TDCS ‘Area of Search’ (Key Diagram 2) for up to 2,000 new homes at Comeytrowe/Trull;

- The application proposal provides a comprehensive masterplan for all of the 2,000 new homes as part of a sustainable urban extension avoiding piecemeal development;

- The application proposals include and phase the necessary infrastructure to support a mixed-use urban extension at Comeytrowe/Trull;
The application proposals do not require, nor do they prejudice, any potential future development of an additional urban extension across the wider south-western area of Taunton;

Permission needs to be granted now to enable the development to begin in 2015/16 as envisaged by the policy.

1.4 It is essential that the full allocation for 2,000 homes is provided as part of the application proposal to ensure that TDBC meet the aims and objectives of the TDCS because:

- As the largest town within the Borough, Taunton is identified (CS Policy SP2) as the main focus for growth and will accommodate 13,000 new homes before 2028 - which equates to approximately 75% of the planned development in the Borough;

- TDBC’s housing trajectory for Taunton (as contained in the 2013 SHLAA appendix 2 and the 2012-13 AMR) identifies the urban extension at Comeytrowe/Trull as being required to deliver all 2,000 new homes from the years 2018 to 2028;

- Without all 2,000 new homes coming forward at the application site TDBC would be at serious risk of falling short of delivering the minimum target of 13,000 new homes before 2028;

- In addition, the current rate of housing completions in Taunton is significantly lower than that anticipated by the adopted Core Strategy’s housing trajectory increasing reliance on strategic sites coming forward quickly;

- The application proposals are, therefore, critical to the delivery of the Plan’s housing requirements.

1.5 The predicted build-out rate for the development (see paragraph 7.10 below) requires that the first phase of new homes is begun in 2015-16 in order to allow all 2,000 homes to be provided before 2028. Permission needs to be granted now in order to allow sufficient time for completion of s106 legal agreements, subsequent reserved matter submissions to be determined, and site preparation works to be completed - so as to allow the first home to be delivered in 2016-17. Therefore, in order to provide all 2,000 new homes before the year 2028 a planning permission needs to be granted as soon as possible.
1.6 An Environmental Statement accompanies the application, which assesses all technical matters associated with the application and concludes that there would not be any significant adverse environmental impacts as a result of the development.

1.7 In addition, granting planning permission would be a significant benefit to the local community including:

- The delivery of up to 2,000 new homes for the Taunton Urban Area;
- The provision of up to 500 new affordable homes;
- The delivery of up to 5.25 hectares of new employment land;
- The proposed development could be expected to generate 3,300 jobs over the 14 year build-period, equating to 236 jobs per year for the Taunton area;
- The development of an additional 2,000 new homes would generate a significant level of spending within the local economy helping local businesses, shops and services;
- Total payment of around £17,992,200 (based on assumed average of Council Tax band D) of New Home Bonus by central government to Taunton Deane Borough Council over 6 years to be spent how they see fit;
- The creation of a strong and vibrant community by providing well designed housing and attractive places for people to live; helping to improve biodiversity and the local landscape; promoting sustainable transport; the provision of allotments for the use by future residents and the provision of high quality public open space.

1.8 For the reasons summarised above, the application proposal is in accordance with development plan policy and should, following NPPF paragraph 14, be approved without delay.
2.0 INTRODUCTION

2.1 This Planning Statement supports an outline planning application on behalf of the Comeytrowe Consortium for a mixed-use urban extension of 2,000 new homes at Comeytrowe/Trull, to the south west of Taunton. (A site location plan is provided at Appendix A).

2.2 The Comeytrowe Consortium consists of Bovis Homes Limited, Mactaggart & Mickel Limited, Summerfield Developments (SW) Limited and Taylor Wimpey UK Limited. Together, they control approximately 118 hectares of land to the south of Comeytrowe/Trull, Taunton.

2.3 The description of proposed development reads:

“Youline planning application with all matters reserved, other than access, for a residential and mixed-use urban extension at Comeytrowe/Trull, including up to 2,000 homes; up to 5.25 ha of employment land; 2.2 ha of land for a new primary school; a mixed use local centre; a principal highway link road connecting the A38 and Honiton Road; and a new 300 space ‘Park and Bus’ facility.”

2.4 The submitted outline planning application will determine the position and design of the access points to service the development. All other matters (layout, scale, appearance and landscaping) are reserved for future consideration.

2.5 In undertaking the technical and design work, the consultant team has liaised with the local authority, statutory bodies and held community consultation in the form of two stakeholder workshops and two separate public exhibitions.

2.6 An Environmental Assessment Scoping Request was made to Taunton Deane Borough Council on 6th February 2012, who subsequently provided a Scoping Opinion on 19th March 2012, which confirmed that the proposals constituted EIA development. The planning application has been prepared in accordance with the Scoping Opinion. The Environmental Statement provided with the planning application has assessed the following topics:

- Landscape and Visual Amenity;
- Ecology and Nature Conservation;
- Transport and Access;
- Air Quality;
- Noise and Vibration;
- Water Resources and Flood Risk;
- Archaeology and Cultural Heritage;
- Ground Conditions and Contamination;
- Socio Economics; and
- Agricultural Land.

2.7 The following reports support the Environmental Statement and planning application:

- Air Quality Assessment (PBA)
- Ecological Baseline Report (EDP)
- Flood Risk Assessment (PBA)
- Phase 1 Ground Conditions Report (PBA)
- Noise Assessment (PBA)
- Transport Assessment and Travel Plan (TPA)
- Archaeological and Heritage Assessment (EDP)
- Landscape and Visual Impact Assessment (EDP)
- Tree Survey and Arboricultural Assessment (EDP)
- Utilities Infrastructure Appraisal (PBA) (not part of the ES)
- Foul Drainage Strategy (PBA) (not part of the ES)
- Design and Access Statement (Barton Willmore) (not part of ES)
- Statement of Community Engagement (Meeting Place Communications) (not part of ES)
3.0 THE APPLICATION SITE AND SURROUNDINGS

3.1 The application site comprises approximately 118 ha of agricultural land to the south-west of Taunton, within the parishes of Comeytrowe and Trull. The land lies within an area of landscape contained to the west by the Stonegallows Ridge.

3.2 The majority of the site is in agricultural use, with small groupings of housing and farms scattered along the existing lanes.

3.3 The site is separated into two broadly equal areas by both Comeytrowe Lane and the Galmington Stream. There are a number of substantial hedgerows and trees that help to define the existing field boundaries of the site, which as far as possible are proposed to be retained as part of the development.

3.4 The site is bounded by the A38 Wellington Road to the north-west and the suburb and parish of Comeytrowe to the north and north-east. To the south, the site adjoins the farmland of Higher Comeytrowe Farm. To the south-east, the site is bounded by Dipford Road and the parish of Trull.

3.5 Manor Industrial Estate is located in the northern part of the site next to Comeytrowe Manor, catering in the main for light-industrial operations.

3.6 A former abattoir site lies just outside of the application site alongside Comeytrowe Lane.

3.7 The application site is located adjacent to the existing settlement limit of south-west Taunton and is the logical location to form an urban extension to the settlement, which is close to the A38 to provide strategic access for new employment land and close to the town centre and public transport routes.

3.8 The application site is not subject to any statutory or local protective designations.

3.9 Detailed descriptions of the application site and its surroundings are provided in the Design and Access Statement and Transport Assessment which accompany the planning application.
4.0 PROPOSED DEVELOPMENT

4.1 The planning application is submitted in outline form and reserves all matters, other than points of access.

4.2 The proposal is for a new garden community of up to 2,000 homes, drawing strongly on the principles of Garden Cities, with an emphasis on creating leafy neighbourhoods with well-defined streets and spaces.

4.3 The new community will comprise two neighbourhoods connected by a central green space. The new development will be complementary to the adjacent communities and sustainably connected to Taunton town centre. It is proposed that the new community will have its own distinct identity that will also reflect the local character and distinctiveness of surrounding areas including Trull and Comeytrowe, and will include a network of connected and accessible open spaces (Please refer to the accompanying Design and Access Statement, which sets out the vision for the proposed development; the extensive public consultation undertaken; and the place-making and design of the new community).

4.4 A summary of the proposed development is provided below:

Housing

- Up to 2,000 new homes with a mix of dwelling types and tenures, with up to 25% being affordable;

- The proposed development will provide primarily family sized housing;

- The average net density across the site would likely be around 35 dwellings per hectare (dph), with higher densities closer to the local centre and key routes and lower densities towards the peripheries of the site and the higher ground.

Employment

- Up to 5.25 ha of employment uses (B1, B2 & B8);

- This could include range of B1, B2 and B8 uses set in a landscaped area and accessed from A38 via the proposed primary route;
The majority of the employment buildings near the A38 Wellington Road will be 1-2 storeys (up to 10m);

The Environmental Statement assumes the following maximum gross internal floor space areas within the employment area:

- B1 - 3,396 m²
- B2 - 3,816 m²
- B8 - 12,080 m²

**Park and Bus**

- A ‘Park & Bus’ facility for up to 300 cars is proposed to the north of the site with direct access from the A38 Wellington Road;
- The facility will measure approximately 1.4 hectare and will be landscaped and easy to access.

**Mixed-Use Local Centre**

- A mixed use area of up to 1.6 hectares is proposed at the centre of the site on the intersection of the proposed east-west avenue and the south avenue link, as the key location for activity;
- It is proposed that the local centre will complement, rather than compete with existing town centre retail facilities and will provide a range of small-scale facilities within convenient walking distance of new homes;
- As part of this application, planning permission is sought to establish the principle of a mixed use local centre, with the exact composition reserved for later consideration by TDBC;
- The Environmental Statement assumes the following maximum gross internal floor space areas within the local centre:
  - Up to 1,000 m² of A1, A2, A3, A4 and A5 Use Classes;
  - Up to 500 m² of B1 Use Class;
  - Up to 250 m² of D1 Use Class.
It is anticipated that a range of facilities could include a local food store with a gross internal floor space of 500 m², other retail with a gross internal floor space of up to 500 m², office (on upper floors) and multi-functional community uses.

**Education and Public Open Space**

- 2.2 ha of land for a two-form entry primary school;
- At least 26 ha of land for use as public open space to include a Neighbourhood Equipped Area of Play (NEAP), 3 no. Locally Equipped Areas of Play (LEAP), at least 1.35 ha of allotment space, at least 7.5 ha of active recreation space (as defined in the Taunton Deane Green Space Strategy 2010, amenity open space, natural areas (including ecological habitat areas) and other green space;
- Sustainable drainage measures.

**Site Access**

4.5 Vehicular access is proposed at 3 key points across the development:

- A new access via the A38 Wellington Road to include a new 60m ICD four-arm roundabout junction and a reduction in speed limit from 50 to 40 mph on the A38 along the development frontage, with improved pedestrian facilities;
- A new access from Honiton Road to include a new 40m ICD three-arm roundabout junction, providing links between Dipford Road, the proposed development and Honiton Road, including local improvements to pedestrian facilities;
- Access via Comeytrowe Lane as a new priority junction, including a 5.5m wide carriageway and 2m wide footways and crossing facilities, with improved facilities for pedestrians.

4.6 The outline planning application comprises 5 parameter plans:

- Land Use Parameter Plan;
- Scale Parameter Plan;
- Density Plan;
- Green Infrastructure Parameter Plan;
• Access & Movement Parameter Plan.

4.7 The application proposals demonstrate that a high quality, responsive and sustainable development is achievable. The proposals have genuinely been shaped by the involvement of the local community and key stakeholders through a series of collaborative workshops.

4.8 The proposed development would provide a sustainable urban extension at Comeytrowe/Trull, which is:

• Visually contained within the landscape to form a natural and sensitive urban extension to Taunton;

• Well connected to the surrounding area;

• Well integrated with efficient transport connections;

• A high quality and attractive development that draws on the character of the surrounding area and creates its own distinct identity;

• Integrated with surrounding neighbourhoods and its landscape setting through the provision of a comprehensive and multi-functional green infrastructure network.

4.9 A full description of the proposed development is provided in the Design and Access Statement which accompanies the planning application.
5.0 PLANNING HISTORY AND BACKGROUND

5.1 This section provides a short summary of the site’s planning history and sets out in chronological order the key reports and studies commissioned by TDBC and government since 2001 which identify and support the land at Comeytrowe/Trull as land that is suitable to accommodate a significant number of new homes. These documents demonstrate that the application site has been identified as an appropriate, logical and sustainable urban extension to the south west of Taunton.

Regional Planning Guidance 10 (2001)

5.2 Regional Planning Guidance 10 (2001) identified Taunton as a Principal Urban Area and as one of eleven settlements in the region that offer the greatest potential for accommodation change and growth in a sustainable way.

Taunton Urban Extension Study (2004)

5.3 The Taunton Urban Extension study identified two key areas of land to the north and south of Taunton, which were sufficiently free from environmental constraints to accommodate up to 4,000 new homes:

- Land to the north-east of Taunton at Monkton Heathfield, and
- Land to the south-west of Taunton at Comeytrowe

5.4 The study found that Monkton Heathfield should come forward for development first, followed by the land at Comeytrowe, given the former’s ability to supply higher levels of employment land.

Taunton Sub Area Study (2005)

5.5 The Taunton Sub Area Study was prepared as part of the evidence base for the former draft South West Regional Spatial Strategy (RSS). The report set a series of scenarios for development:

- Scenario 1A included a strategic urban extension at Comeytrowe of 6,000 – 6,500 homes including a local centre, providing for local convenience shopping needs and local leisure uses, such as restaurants and pubs;
• Scenario 1B comprised a number of extensions to the north of Taunton at Monkton Heathfield (4,000 homes) and Staplegrove and Pryland (3,000 homes);

• Scenario 2A included development to the north and south of the town of about 12,000 new homes (combining options 1A and 1B); and

• Scenario 2B included development to the east of the motorway of about 12,500 homes.

5.6 The report recommended that:

• An urban extension at Monkton Heathfield is promoted; and

• In the longer-term, a further substantial extension at Comeytrowe/Trull should proceed.

*Regional Spatial Strategy (RSS) for the South West (2006)*

5.7 The now defunct draft RSS identified two areas of search for urban extensions at Taunton, the first at Monkton Heathfield with a capacity of 4,000 dwellings, and the second at Comeytrowe with a recommended capacity of 3,000 dwellings.

5.8 The Panel Report from the RSS Examination in Public (2008) capped development in this location to just 3,000 new homes within the plan period to 2026, as reaching the full potential of 6,000-8000 homes would require significant transport infrastructure investment.

*Urban Initiatives Report (2010)*

5.9 The report assessed potential urban extensions at Taunton and potential interim release sites. The report states that the land at Comeytrowe is of lower grade agricultural land and is less sensitive in landscape terms in comparison to other areas surrounding Taunton.

5.10 The report sets out a number of key issues for Comeytrowe:

• Scale of new development should reflect local character, including conservation areas;
• New development should respect the landscape setting and avoid the upper slopes adjacent to the special landscape feature;

• Flood mitigation measures are required along the Galmington Stream;

• New junction needed on to A38;

• Additional access points from existing routes required to promote permeable movements into Galmington;

• Internal spine route needed to link A38 to Honiton Road;

• New development should retain views to local landmarks and allow open vistas to the south; and

• Need for a new local centre associated with new development.

5.11 The application proposal meets all of these objectives.

_Taunton Deane Core Strategy Examination Inspector’s Report (2012)_

5.12 The Inspector’s Report following the Core Strategy examination makes reference to the need for an urban extension at Comeytrowe/Trull and the importance of its delivery.

5.13 The inspector stated:

• The Consortium submitted an initial masterplan and significant information about infrastructural requirements at the examination;

• There has been meaningful and constructive dialogue with TDBC and SCC officers on the details of the Comeytrowe proposals;

• The timing of the commencement of development within the broad locations is critical to the soundness of this plan (para 64);

• Should masterplanning work progress more rapidly than anticipated, any planning application would fall to be considered against the presumption in favour of sustainable development implemented through policy CP1 of the plan (Para 64).
Adopted Core Strategy (2012)

5.14 The adopted Core Strategy’s Key Diagram identifies the land at Comeytrowe/Trull as a broad location for development of up to 2,000 new homes before the year 2028 in accordance with Policy SS7 of the Plan (please refer to Chapter 6).

Taunton Strategic Urban Extensions Study: Comeytrowe/Trull and Staplegrove

5.15 This study considers options for locations for the Comeytrowe urban extension within the broad location identified in the Core Strategy. The report recommends that option 1 (which corresponds to the Comeytrowe Consortium’s site) should be the preferred option for growth, based on assessments of the ability of each option to accommodate growth, together with sustainability appraisal assessments and access and movement assessments of each option.

Draft Site Allocations and Development Management Plan (SADMP) (2013)

5.16 The draft SADMP Preferred Options document identifies the application site as a preferred site for allocation as part of the preferred option for the Comeytrowe/Trull urban extension within the Core Strategy’s broad location.
6.0 PLANNING POLICY CONTEXT

Introduction

6.1 This section summarises the relevant planning policy context for the planning application and outlines how the proposal accords with those policies.

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.

6.3 The Development Plan for the application site comprises:

(i) The adopted Taunton Deane Core Strategy (TDCS) (2012)
(ii) The saved policies of the Taunton Deane Local Plan (2004)

6.4 Relevant material planning considerations include:

(i) National planning policy including the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG); and

(ii) The draft Taunton Deane Site Allocations Development Management Plan (SADMP).

National Planning Policy

Planning for Growth (March, 2011)

6.5 In March 2011, the Minister of State for Decentralisation published Planning for Growth in which he confirmed that:

“the planning system has a key role to play in (rebuilding Britain’s economy) by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible.” (para 1)

“Government’s clear expectation is that the answer to development and growth should whenever possible be yes except where this would compromise the key sustainable development principles set out in national planning policy”. (para 2)
“when deciding whether to grant planning permissions, local, planning authorities should support enterprise and facilitate housing, economic and other forms of sustainable development”. (para 5)

6.6 He advised local authorities to:

“take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing.” (para 5(ii))

“ensure that they give appropriate weight to the need to support economic recovery, that applications that secure sustainable growth are treated favourably (consistent with Policy in PPS4) and that they can give clear reasons for their decisions.” (para 6)

6.7 This provided a clear indication of the Government’s objectives to update planning policy to increase housing land supply, encourage sustainable development and foster economic growth.

National Planning Policy Framework (March 2012)

6.8 The National Planning Policy Framework (NPPF) was published on the 27th March 2012 and confirmed the Government’s commitment to streamlining the planning system and encouraging growth. It introduced a presumption in favour of sustainable development at the heart of the planning system in terms of both plan-making and decision-taking to promote a positive approach towards planning and growth.

Presumption in Favour of Sustainable Development

6.9 Paragraph 14 sets a presumption in favour of sustainable development. The guidance requires local planning authorities to positively seek opportunities to meet the development needs of their area. For decision-taking this means approving development proposals that accord with the development plan without delay. Where the development plan is absent, silent or relevant policies or out of date, it means granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.
Delivering a Wide Choice of High Quality Homes

6.10 To boost significantly the supply of housing, paragraph 47 requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from the plan period) or an additional 20% where a local authority has a persistent record of under delivery.

6.11 Paragraph 52 states that “The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities”.

Determining Planning Applications

6.12 Paragraphs 186 and 187 of the NPPF set out how the Government expects planning decisions to be taken in a positive way that encourages the delivery of sustainable development:

“Local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. The relationship between decision-taking and plan-making should be seamless, translating plans into high quality development on the ground.” (Para 186)

“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.” (Para 187)

6.13 The documents that support the planning application, including the supporting Environmental Impact Assessment, demonstrate that the proposed development is sustainable and that the proposals will provide many benefits for the area without any significantly adverse environmental impacts. Accordingly, in accordance with paragraph 187, the Council should seek to approve the application.

Good Design

6.14 The Government’s support for good design is reiterated in paragraph 56 of the NPPF which states that good design is a key aspect of sustainable development and is indivisible from good planning.
6.15 The Design and Access Statement which supports the planning application sets out how the scheme follows the principles of good design to create a sustainable development, entirely in keeping with its local context.

**Planning Practice Guidance (March 2014)**

6.16 The Planning Practice Guidance (PPG) was published in March 2014 to support the NPPF, providing advice as to how to deliver its policies. The PPG represents the latest Government guidance, which condenses previous guidance notes in to a more useable and accessible resource - following the recommendations of the Lord Taylor Review (December, 2012).

6.17 The PPG is capable of being a material planning consideration in the determination of planning applications. The key Government guidance of relevance to the application proposals includes:

**Good Design**

6.18 This PPG reinforces the centrality of good design as an integral part of achieving sustainable development. An emphasis is placed on good design making “the best possible use” of resources, including land, community, economic and infrastructure over the long as well as short term.

**Determining Planning Applications**

6.19 The PPG reinforces the importance of the NPPF as representing the most up-to-date Government planning policy, which must be taken into account where it is relevant to a planning application or appeal. Importantly, the guidance states that if decision-takers choose not to follow the NPPF, clear and convincing reasons for doing so are needed. To this end, the PPG stresses the importance for decisions to be made:

- Without delay, where a proposal accords with an up-to-date development plan; and

- In accordance with the presumption in favour of sustainable development if the development plan is absent, silent or the relevant policies are out of date.

6.20 A major new addition to planning policy is the guidance provided on the issue of prematurity of a planning application. The NPPG states that
“Arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account.”

6.21 Such circumstances are likely to be limited to situations where both:

- the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or Neighbourhood Planning; and

- the emerging plan is at an advanced stage but has not yet been adopted (or, in the case of a neighbourhood plan, been made). Furthermore, the guidance advises that the refusal of planning permission on grounds of prematurity will seldom be justified where a draft Local Plan has yet to be submitted for examination.

Planning Minster (January 2013)

6.22 Planning Minster Nick Boles delivered a speech ‘Housing the Next Generation’ which reaffirms a priority for the Government’s planning policy:

“The original source of our housing crisis is the failure of past governments to provide enough land for development. As planning minister, it is my job to persuade local authorities to make more land available so that more homes can be built and the prices of new homes comes down.”

6.23 It is absolutely clear that that the Government is committed to increasing housing land supply across England and local authorities should make appropriate land available for new homes and, wherever possible, grant planning permission for new homes now.

Local Planning Policy

Taunton Deane Core Strategy

6.24 The Taunton Deane Core Strategy (TDCS) was adopted in 2012, and covers the period 2011-2028. The TDCS sets out the vision for Taunton Deane and specifies the locations and quantity of growth to be accommodated within the Borough up to 2028.
6.25 The existing Proposals Map is currently under review by TDBC as part of the SADMP Development Plan Document, which identifies the application site as a preferred allocation for an urban extension at Comeytrowe/Trull. The site is not covered by any restrictive designations.

6.26 One of the Core Strategy’s principal strategic objectives is stated as:

“To provide a sufficient supply of high quality housing accommodation to meet the needs of all sections of the community and strategic housing requirements.”

6.27 **Policy SD1** sets a presumption in favour of sustainable development in accordance with Government policy contained within the NPPF. The policy states that:

“Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise - taking into account whether:

Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework indicate that development should be restricted.”

6.28 Other policies of relevance include:

6.29 **Policy SP1** ‘Sustainable Development Locations’, which states that development will be focussed on the Taunton Urban Area (TUA), which needs to accommodate 13,000 new homes before 2028.

6.30 **Policy SP2**: ‘Realising the vision for Taunton’ sets out targets for the proportion of development that is expected to be delivered in the Taunton Urban Area. This includes the provision of around 9,500 additional jobs; 42,200 sqm of additional office space; 81,100 sqm of additional retail space; 35,000 sqm of additional assembly and leisure space and 23.5 hectares of land for Class B1, B2, B8 and sui generis uses. Also within the TUA, at least 13,000 net additional dwellings are to be built, with 3,250 to be affordable units.
6.31 Key Diagram 2 of the Core Strategy, which appears above, indicates the broad location for an urban extension at Comeytrowe/Trull, to the south-west of Taunton.

6.32 **Policy CP1**: ‘Climate Change’ sets out how the Council will ensure that development proposals will help to produce a sustainable environment via:

- Reducing the need to travel;
- The protection of the quality, quantity and availability of the water resource;
- Incorporation of measures which promote and enhance the resilience of ecosystems and biodiversity networks within and beyond the site;
- The adoption of the sequential approach and exceptions test to flood risk.

6.33 **Policy CP2**: ‘Economy’ sets out a target of around 11,900 net additional jobs to be delivered in TDBC throughout the plan period.

6.34 The application proposals provide for up to 5.25 ha of land for B1, B2 & B8 uses, located off the A38. This will help meet TDBC’s objective to provide new employment land within the Taunton Urban Area.
6.35 **Policy CP3**: ‘Town and other Centres’ sets out the hierarchy of development within the Borough. The primary focus for development is Taunton town followed by Monkton Heathfield and the urban extensions (including Comeytrowe), and then Wellington with Rural Areas afforded the smallest amount of provision.

6.36 **Policy CP4**: ‘Housing’ sets a Borough wide target of at least 17,000 new homes over the period 2008-2028. The distribution to be phased as follows:

- 1 April 2011 - 31 March 2016: at least 3,500 new dwellings;
- 1 April 2016 - 31 March 2021: at least 4,500 new dwellings; and
- 1 April 2021 - 31 March 2028: at least 7,500 new dwellings.

6.37 The Plan seeks to secure around 4,000 new affordable housing units. A target of 25% of new development proposals should be affordable units on sites of 5 or more dwellings.

6.38 The Core Strategy requirement of least 17,000 new dwellings over the period 2008 to 2028 needs to be delivered in order to support the Plan's employment creation objective of 11,900 additional jobs over the plan period (see policy CP2 above).

6.39 To meet the minimum dwelling requirement the Council sets a target of completing approximately 700 homes per year from 2011-2016; rising to 900 homes/year until 2021 and 1076 homes/year from 2021-2028.

6.40 The 2012 to 2013 Annual Monitoring Report records actual housing completions significantly below the 700 homes per year required to deliver the Plan’s housing requirements before 2028.

6.41 The application proposals provide 2,000 new homes at Comeytrowe/Trull, which are critical to the delivery of the Core Strategy housing requirements, and thus the delivery of TDCS Policy CP4.

6.42 **Policy CP6**: ‘Transport and Accessibility’, requires that development contributes to reducing the need to travel, improving accessibility to jobs, services and community facilities, and mitigating and adapting to climate change.

6.43 The application proposals seek to achieve this by:
- Providing a mix of land uses, hence reducing the need to travel, particularly by private car and maintaining high levels of self-containment;

- Improving accessibility between homes, jobs and services by improving walking, cycling and public transport routes, and by locating 90% of new housing within 400m of a principal bus corridor (which will serve the College, the Hospital and the town centre);

- locating residential development within 30 minutes public transport time of a GP, hospital, primary school, employment and major retail area;

- locating 80% of housing within 5 minutes’ walk of a local centre.

- providing a bus priority corridor with infrastructure improvements between the urban extension and Taunton Railway Station, which link in to wider Core Strategy proposals for a priority bus corridor between Wellington and Bridgwater. A park and bus site is also proposed on the A38 frontage within the urban extension which would utilise the enhanced bus services on the corridor.

6.44 **Policy CP7**: ‘Infrastructure’ sets out TDBC’s objective to ensure that infrastructure is provided to support new development set out in the TDCS. TDBC officers have advised that the application proposals will be determined in the light of CIL.

6.45 **Policy CP8**: ‘Environment’ seeks to conserve and enhance the natural and historic environment. The policy identifies a network of green infrastructure assets that are required to be retained and enhanced.

6.46 The policy states that a new green wedge is proposed to be delivered as an integral part of urban extensions at Comeytrowe/Trull in Taunton. The application proposals incorporate a new green wedge along the Galmington Stream, which reflects the aspirations of the Core Strategy’s Green Infrastructure Plan. The policy seeks to direct development away from land at risk of fluvial or other causes of flooding (including areas likely to be subject to flood risk in the future as a result of climate change) adopting a sequential approach to the location of development, as set out in the Strategic Flood Risk Assessment Level 2. The application proposals are accompanied by a Flood Risk Assessment, which has prepared liaison with the Environment Agency, that demonstrates that the proposed development will not be at risk of flooding, nor will it increase the risk of flooding elsewhere.
6.47 Broad Locations for Development

The Core Strategy sets out a number of number of ‘Broad Locations for Growth’ after the year 2015. At Taunton the Core Strategy identifies land for mixed use development at Comeytrowe.

6.48 Policy SS7: ‘Comeytrowe/Trull – Broad Location for Growth’ states:

“Comeytrowe/Trull is a broad location for a mixed use strategic urban extension for development after 2015 for between 1,000 and 2,000 dwellings up to 2028. A masterplan will be prepared to identify the full long term potential for comprehensive development in this south west sector of Taunton and the infrastructure required to provide a sustainable new community. The masterplan will phase and co-ordinate development to provide the necessary physical, social and green infrastructure. A piecemeal approach to development in this area before a comprehensive masterplan has been agreed will not be permitted.”

6.49 The Core Strategy states that land at Comeytrowe/Trull is the second most sustainable location for a strategic urban extension after Monkton Heathfield.

6.50 The application proposals meet the aims and objectives of Policy SS7 as follows:

- The application site is located within the Taunton Deane Core Strategy (TDCS) ‘area of search’ for up to 2,000 new homes at Comeytrowe / Trull, as illustrated by Key Diagram 2 of the TDCS;

- The application proposals provide all 2,000 new homes, which is required to meet the Core Strategy housing requirement of 17,000 new homes before 2028;

- The application proposals identify the necessary infrastructure to support a mixed-use urban extension;

- The proposals provide a comprehensive masterplan for the entire allocation of 2,000 new homes, including up to 25% affordable homes, which neither requires, nor prejudices the possible future wider development of 6,000 homes to the south-west of Taunton.
6.51 **Policy DM1**: ‘General Requirements’ sets out a number of requirements including
making efficient use of land, achieving appropriate access, avoiding harm to protected
wildlife species, and avoiding unacceptable harm to the appearance and character of
the landscape or built environment.

6.52 The application proposals meet the objectives of Policy DM1, as follows:

- The application proposals provide for the full 2,000 dwelling allocation at Policy SS7
  making the most efficient use of land at an average density of 35 dph;

- The proposals are accompanied by a Transport Assessment, Noise Assessment; and
  Air Quality Assessment, which demonstrate that there would not be any significant
detrimental impacts arising from the development;

- The application is accompanied by an Ecological Assessment, which concludes that
  there would not be any significant harm to protected wildlife species or their
  habitats;

- The accompanying Design & Access Statement (DAS) and Landscape and Visual
  Impact Assessment demonstrate that there would not be any significant harm to
  the landscape or character of the settlement.

6.53 **Policy DM4**: ‘Design’ seeks to provide a ‘sense of place’ for new development. The
accompanying DAS has been prepared following best practice and has involved
extensive public consultation and stakeholder involvement. The proposed masterplan
has been prepared in liaison with local people and TDBC officers, drawing on character
areas of the surrounding neighbourhoods to provide a distinct sense of place for the
new neighbourhood at Comeytrowe/Trull.

6.54 **Policy DM5** requires developments to incorporate sustainable design features to
reduce their impact on the environment, mitigate and adapt to climate change, and in
particular help deliver reduction in CO2 and other greenhouse gas emissions. The
application proposals seek to create a sustainable development that meets the
objectives of the NPPF: economic, social and environmental. The strategy to achieve
this is set out in the accompanying Design & Access Statement.
Draft Site Allocations and Development Management Plan (SADMP) Preferred Options (November 2013)

6.55 The Preferred Options draft SADMP identifies the application site as part of the urban extension at Comeytrowe/Trull and within the Core Strategy’s area of search. SADMP Map 2.4 (which appears below) shows the preferred location of the Comeytrowe urban extension.

6.56 The SADMP states that the preferred option seeks to address the following issues at Comeytrowe/Trull:

- Minimise landscape impact of development by avoiding the prominent ridgeline to the west of the site;
- Delivery of a new Green Wedge and provision of green infrastructure and landscaping;
- Ensure a clear separation to the village of Trull;
- Delivery of a new spine road linking up the development areas between A38 and Honiton Road;
- Traffic calming and management to reduce impact on Comeytrowe and Staplehay;

- Delivery of enhanced east-west cycle and pedestrian routes;

- A park and bus facility adjacent to the A38 and bus priority corridor improvements on the A38.

6.57 The application proposals meet all of the above criteria. It is important to note that the draft SADMP proposes additional land at Comeytrowe/Trull, beyond that forming part of the application proposal, namely the Green Wedge at Galmington Stream, Land at Higher Comeytrowe Farm, and Land adjacent Trull Village. It is considered that the application proposals are sufficient to deliver up to 2,000 new homes alongside all the necessary infrastructure and open space requirements to provide a sustainable mixed-use urban extension. Notwithstanding this:

- The green wedge along Galmington Stream is not required to form part of the application red line and fulfils its planning purpose naturally as a green wedge - acting as open land in its present form.

- Higher Comeytrowe Farm is currently constrained by its topography being situated on more prominent higher land to the west of the site. The land is not required to provide the Plan’s 2,000 new homes. The application proposals do not, however, prejudice the future delivery of development of the Higher Comeytrowe Farm site, should it be required in the future.

6.58 The SADMP allocates development to the limits of Honiton Road, without protecting an important green buffer between Trull village and future development. In contrast, it is considered that the current application proposals provide an appropriate amount of open space between Trull and the proposed development, helping to maintain the village identify and character of Trull.

**Taunton Deane Local Plan (TDLP) (1991 - 2011)**

6.59 A number of Policies the TDLP are now either out of date or have been replaced by the Core Strategy. However, there are still a number of ‘saved policies’ active until the Site Allocations and Development Management Plan is adopted which, as such, still form part of the Development Plan. Those that are considered relevant to this application are summarised below:
6.60 **Policy M1**: ‘Non Residential Developments’ requires developments to:

- Cater safely for the expected number of trips generated or attracted by them;
- Provide sufficient cycle, pedestrian and public transport facilities to cater safely and conveniently for those trips;
- Make provision for the movement needs of staff, customers and other visitors with impaired mobility or disabilities by careful positioning of potential obstructions, ramps, dropped kerbs, textured surfaces and reserved car parking.

6.61 **Policy M3**: ‘Non Residential Developments and transport provision’ requires developments to take account of:

- transport and car parking provision proposed in conjunction with the development,
- the required level of accessibility by public transport,
- cycling and walking - which can be provided in a manner that is both safe and convenient,
- the highway network - which will cater safely for the expected number of car trips attracted, and
- undesirable parking pressure in nearby residential streets.

6.62 In response to Policies M3 and M4 the application proposals provide the opportunity for people to live and work in Taunton without reliance on the private car, or without having to out commute. The application proposals provide the opportunity for residents to walk or cycle from the site only a short distance to reach the local centre, employment opportunities and primary school.

6.63 **Policy M4**: ‘Residential Parking Provision’ is also saved. The application proposal's parking provision will be considered in detail as part of reserved matters application(s). However, it is envisaged that car parking will be provided broadly in accordance with Somerset County Council’s Parking Strategy (dated March 2012). The Parking Strategy suggests the following level of provision:
- One bedroom dwellings – 1 space per unit;
- Two bedroom dwellings – 1 space per unit;
- Three bedroom dwellings – 2 spaces per unit; and
- Four bedroom dwellings – 3 spaces per unit.

6.64  The Strategy sets out that, where less than half of the parking is unallocated, an additional 0.2 spaces per dwelling should be provided. The urban extension will reflect this as appropriate.

6.65  **Policy EN6 & EN8**: seek to protect trees, orchards and hedgerows and the landscape value of trees, unless adequate provision is made to compensate for their loss. The application proposals seek to retain hedgerows as far as possible within the new development. In addition, the application includes an over-arching Green Infrastructure Plan and proposed the creation of new tree buffer planting on a site-wide basis.

6.66  **Policy T34** seeks to protect the landscape setting of approach routes into Taunton. The application proposals incorporate new tree planting on the A38 approach to Taunton to shield the proposed park and ride and employment area from view when approaching the town.

**Trull Neighbourhood Planning Group**

6.67  Trull Neighbourhood Planning Group (TNPG) is currently preparing a Neighbourhood Plan for Trull Parish, which includes the planning application site. It understood that TNPG intends to publish a first draft Neighbourhood Plan in Spring, 2015.

6.68  In light of this, representatives of the Comeytrowe Consortium met with Trull Neighbourhood Planning Group in August 2014 and presented the proposals for the South West Taunton urban extension. It is the intention of the Comeytrowe Consortium to continue to engage with members of the public, officers, the parish councils and TNPG throughout the preparation and determination of the outline planning application and during the preparation of any subsequent reserved matter submissions.
6.69 At present, no draft neighbourhood plan has been published. If a draft neighbourhood plan is published prior to determination of this application the weight it is to be afforded in the decision making process will be determined in accordance with Paragraph 216 of the National Planning Policy Framework and Government guidance contained in the Planning Practice Guidance (Paragraph: 014 Reference ID: 21b-014-20140306).
7.0 PLANNING ASSESSMENT OF THE PROPOSED DEVELOPMENT

7.1 This section of the Planning Statement provides a brief assessment of the proposed development in relation to the key planning considerations.

**Principle of Development**

7.2 The principle of development of a mixed use urban extension for between 1,000 and 2,000 dwellings within the Comeytrowe/Trull is established by TDCS policy SS7. The application site was endorsed, based on a number of assessments, as the best location for the urban extension by the Taunton Strategic Urban Extensions Study. The application site also forms part of the preferred option for the location of the urban extension in the emerging SADMP.

7.3 The proposal provides for a mixed use urban extension, including a local centre and up to 5.25 ha of new employment land, offering opportunities for local businesses wishing to locate within Taunton and generating more local jobs.

7.4 Furthermore, the proposed development would achieve policy SS7s aspiration for a comprehensive, masterplanned development which delivers the necessary physical, social and green infrastructure and avoids piecemeal development. Detailed work with officers and consultees through a lengthy pre-application process has ensured that the development will meet these goals. The outline planning application is supported by an indicative phasing strategy, which is set out in the Design and Access Statement, and shows a phased comprehensive development of the site.

7.5 The principle of development of the site for a mixed use urban extension is therefore considered to be in accordance with adopted and emerging policy.

**Quantum and Timing**

7.6 The Council’s housing trajectory and delivery figures demonstrate that it is essential that the full provision for 2,000 homes is provided at Comeytrowe/Trull in order to meet the TDCS objective to provide a minimum of 17,000 new homes, including 4,000 new affordable homes, before 2028.
7.7 TDBC’s housing trajectory for Taunton (which appears as appendix 2 to the 2013 SHLAA and in the 2012-13 AMR) identifies the urban extension at Comeytrowe/Trull as delivering all 2,000 new homes from the years 2019 to 2028. Without all 2,000 new homes coming forward at the application site, TDBC is therefore at serious risk of falling short of delivering the minimum housing target of 13,000 new homes in the Taunton Urban Area before 2028.

7.8 This risk appears to be greater in view of the fact that the current rate of housing completions in Taunton is significantly lower than that anticipated by the Core Strategy’s housing trajectory. Between 2008 and 2013 there were only 2,301 net completions. The trajectory sets a 500 homes a year target from 2008 to 2011, which increases to 700 homes a year for the years 2012 and 2013. Actual housing completions up to 2013 have only averaged 460 homes per year.

7.9 TDBC state that this reduction in housing completions is a result of a lack of smaller, deliverable sites in Taunton town centre. As a result, there is now a much higher reliance on larger strategic sites coming forward – in particular the urban extension at Comeytrowe/Trull.

7.10 In order to provide all 2,000 new homes before the year 2028 outline planning permission needs to be granted as soon as possible. This point is demonstrated by the anticipated development trajectory for the application proposal below:

- Determination of Outline Planning Application by TDBC - mid 2015;
- Completion of s106 – end 2015;
- Discharge of All Outline Planning Conditions - early 2016;
- Preparation of Reserved Matters Application (Phase 1) - mid 2016;
- Rolling submission of subsequent reserved matters applications (2016 – 2025);
- Determination of Phase 1 Reserved Matters - late 2016;
- Access and Enabling Works - early 2016;
- Delivery of new homes:
### Year | Projected completions
--- | ---
2016-17 | 50
2017-18 | 100
2018-19 | 150
2019-20 | 175
2020-21 | 200
2021-22 | 200
2022-23 | 200
2023-24 | 200
2024-25 | 200
2025-26 | 200
2026-27 | 175
2027-28 | 150

7.11 This trajectory demonstrates that a planning application needs to be determined by TDBC as soon as possible in order to allow the first home to be delivered in 2016-17. It should also be noted that policy SS7 supports delivery of the urban extension after 2015.

**Relationship with Possible Future Development at South West Taunton**

7.12 The 2013 SHLAA states that: “There is longer-term potential at Comeytrowe/Trull which could meet development needs beyond the Plan period up to 2028” (emphasis added). In light of this, the applicant has prepared (at officers’ request) a wider masterplan for south-west Taunton, identifying the potential for further new homes during the next plan period. The wider masterplan is based on the provision of an additional larger district centre and another local centre on land to the south of the application.

7.13 The masterplan demonstrates that the application proposals would neither prejudice, nor require the possible future development of south-west Taunton in terms of infrastructure delivery or otherwise.

**Issues Arising From the Examination**

7.14 Three areas of further investigation were raised by the Council’s officers at the Core Strategy Examination in relation to the land at Comeytrowe/Trull and the proposed masterplan submitted by the Consortium:
The scale of development on elevated ground to the north-western corner of the site, near to the main site entrance on the A38;

The provision of access to the east of the site; and

Routes to bring forward land at Comeytrowe/Trull for development.

1. Scale of Development on Higher Ground

Concern was raised by TDBC at the Examination as to the impact of any development proposed on the elevated land in western parts of the site, which might have a landscape impact.

As part of pre-application discussions with TDBC officers, an urban design and landscape strategy for the elevated land in the western parts of the site has been prepared. The strategy seeks to ensure that the application proposals do not have a detrimental impact on the surrounding landscape and visual amenity. The strategy includes the following:

- Employment buildings set back from the site’s northern boundary to reduce visibility from the A38 and enhance the ‘landscape fit’ of the proposals;

- Employment buildings on higher ground are restricted to 10 metres in height to reduce potential visual impact; and

- The local high ground and woodland at Rumwell Copse (above the 60m contour) are sensitive to development and have been identified as the preferred location for the ‘Park and Bus’ facility. This facility contains no significant built development, and with proposed tree planting as illustrated with the DAS, will be easily assimilated into the existing landscape structure.

2. The Provision of an Eastern Site Access

Somerset County Council previously raised concerns regarding the adequacy of the proposed point of access to the east of the site, which was previously proposed by means of a new (32m) roundabout off Dipford Road.
7.18 In response to comments from SCC and TDBC officers the Consortium has since acquired control of the land between Dipford and Honiton roads, allowing a new junction to be designed that has greater capacity to meet the potential future trip generations projected to arise from the proposed development.

3. Routes to Bring Forward Land at Comeytrowe/Trull for Development

7.19 At the Core Strategy Examination, 3 possible routes were explored by the Inspector to bring forward the broad allocation at Comeytrowe/Trull (CS Policy SS7):

- Via the production of a Development Plan Document (DPD)
- Annual monitoring/interim site release
- Planning application, via the presumption in favour of sustainable development

(a) Development Plan Document (DPD)

7.20 One possible route is for the land at Comeytrowe/Trull to come forward as part of TDBC’s emerging SADMP.

7.21 Representations have been made by the Applicant at each stage of the preparation of the SADMP. The document has reached the Preferred Option stage (November, 2013). This document is programmed by TDBC to be examined in 2015.

7.22 As demonstrated by the development’s trajectory above, in order to ensure that all of the required 2,000 homes are delivered within the plan period, a planning application needs to be determined as soon as possible to ensure a build rate that delivers the new homes before 2028.

7.23 Delaying the preparation of a planning application until the DPD is adopted will not, therefore, meet the requirements of the Core Strategy to deliver 17,000 new homes over the plan period. In any event, the latest Preferred Options version of the SADMP supports the application proposals (Please refer to Chapter 6). It is therefore considered that there is no conflict with emerging policy and, in accordance with the PPG, prematurity should not constitute a reason for refusing planning permission.
(b) **Annual Monitoring / Interim Site Release**

7.24 The explanatory text to adopted Core Strategy Policy CP4 suggests that sites may come forward as “further interim release sites” following the annual review of TDBC’s Strategic Housing Land Availability Assessment (SHLAA). The Core Strategy’s delivery mechanism for policy CP4 (Housing) sets out the Council’s responsibility to monitor housing land supply and, in particular, the five year deliverable supply of housing land. As part of this process, the Core Strategy makes a commitment to review the strategic site allocations and Broad Locations in order to gauge the level of contribution each site is capable of making at any point in time. Where the SHLAA process identifies a shortfall in the five year deliverable supply of housing land, the Council may identify further interim release sites and measures to unlock existing planning permissions and/or consider the early release of allocated sites.

7.25 As the site is both within the broad location and a proposed allocation it is not considered that reliance on the “further interim release sites” policy is necessary. However, as identified above, in order to allow development to begin in 2015-6 and the site to contribute to delivery of the Council’s housing requirement within the plan period the site needs to come forward now.

(c) **Submission of a Planning Application**

7.26 For the reasons set out above, an application needs to be submitted now to deliver the full allocation of 2,000 homes within the plan period. Both adopted Core Strategy Policy SD1 and the NPPF set a presumption in favour of sustainable development. Planning applications that accord with the policies in the Core Strategy should be approved without delay, unless material considerations indicate otherwise.

7.27 This view is supported by the Inspector at the TDBC Core Strategy Examination, who stated that should masterplanning work for the urban extension at Comeytrowe/Trull progress more rapidly than anticipated, any planning application would fall to be considered against the presumption in favour of sustainable development implemented through Core Strategy Policy CP1.
Compliance with Other Planning Policy and Technical Constraints

7.28 Section 6 (above) demonstrated that the proposal accords with other relevant adopted and emerging local planning policies. The proposal is also supported by national policy. The following section (section 8) briefly summarises how the submitted Environmental Statement demonstrates that there are no significant constraints to the proposed development.
8.0 TECHNICAL STUDIES

8.1 Various technical assessments have been undertaken to consider the opportunities and potential constraints of the application site and to inform the proposed development. The list of technical studies was agreed with the Council and includes:

- Transport Assessment and Travel Plan (TPA);
- Flood Risk Assessment (PBA);
- Ecological Assessment (EDP);
- Archaeological Assessment (EDP);
- Noise Impact Assessment (PBA);
- Air Quality Assessment (PBA);
- Landscape and Visual Impact Appraisal (EDP);
- Ground Investigation Report (PBA);

8.2 The findings of these technical studies are set out in detail within each of the respective reports and have been reflected in the design of the proposed development. A summary of the findings of the key reports is provided below.

Transport and Accessibility

8.3 The Transport and Access chapter of the Environmental Statement contains an assessment of the likely significant effects of the Proposed Development in relation to traffic and access. The Transport and Access chapter is supported by a Transportation Assessment and Travel Plan.

8.4 The location of the application site is such that it has access to a good mix of services, facilities, amenities and public transport opportunities within walking and cycling distance.

8.5 During the construction phase a Construction Environmental Management Plan will be implemented and will include measures for the management of construction related traffic, leading to the environmental significance of construction related traffic being identified to be negligible.
8.6 As part of the assessment, future forecasted traffic levels have been considered, including flows from cumulative developments. The forecasted traffic flows for when the proposed development is anticipated to be completed in 2028 will generally be of minor adverse significance. A package of measures has been proposed to mitigate any adverse effects including Travel Plans, new and improved pedestrian and cycle routes and improvements to bus stops and a park and bus facility. With mitigation therefore the impacts are likely to be reduced to negligible adverse significance.

**Flood Risk and Drainage**

8.7 The EA flood map shows the majority of the site as lying within Flood Zone 1 – i.e. an area outside the limit of extreme flooding from tidal or fluvial sources with less than 1 in 1000 annual probability of flooding, in any year. Only narrow strips of land adjacent to the Galmington Brook are located within Flood Zones 2 and 3, where the risk of flooding is greater. In accordance with the NPPF and PPG, all development, other than essential road crossings, would be located in Flood Zone 1 to ensure the flood risk to properties is low.

8.8 The application is accompanied by a Flood Risk Assessment (FRA) and the results of which are included in the Water Resources and Flood Risk chapter of the Environmental Statement.

8.9 The FRA demonstrates how the proposed mitigation measures will manage the risk of surface water flooding (to a 1 in 100 year event, plus a 30% allowance for predicted climate change). The proposed attenuation and drainage strategy for the site comprises:

- Open pond storage and linear storage features, containing both the attenuation and long-term storage. The ponds are located within areas of public green space throughout the site. The ponds will be integrated into the landscape as a combination of publically accessible green space which is allowed to flood in extreme events, and ecological wet areas utilising suitable planting, boardwalks etc. to enhance the amenity benefit.

- The flow from these ponds is controlled to the annual average greenfield rate prior to discharging into the brooks.
There will be no on-line attenuation on the Galmington stream itself, the characteristics of which would therefore remain unaltered by the development proposals.

8.10 The surface water drainage strategy has been designed to ensure that the buildings within the proposed development would not be flooded by a 1 in 100 year flood event (including a 30% allowance for climate change). Additional measures, such as raising threshold levels, has been proposed to mitigate the risk from even larger flood events or localised flooding. The rates of surface water run-off draining to Galmington Stream will be limited to the same as, or better than, current conditions. Accordingly, the risk of flooding to the proposed development is low.

Ecology

8.11 Extensive ecological surveys have been undertaken of the application site, which have helped inform the planning application for the development. The results of the surveys are included in the Ecology and Nature Conservation chapter of the Environmental Statement, which includes an assessment of the impacts and the mitigation works proposed.

8.12 In summary, the habitats within the site are generally of low ecological value, reflecting the agricultural land use which dominates, however some habitats of higher value were identified, namely the Galmington Stream (which is part of a LWS and connects with a LNR), hedgerows, trees and ponds. Protected species/species groups which were recorded within the site include bats, birds, dormice, badgers and reptiles.

8.13 The long-term strategy to mitigate adverse effects includes creating and managing new habitats of ecological value and/or new opportunities for protected species, to provide net gains for biodiversity. The design and layout of the proposed new/compensatory habitats, which includes woodland, hedgerows, flower-rich grassland and wetlands, has been closely integrated with the other objectives for undeveloped open ('green') spaces such as public enjoyment and surface water management.

8.14 Overall, through sensitive design and additional mitigation measures proposed, there are no significant ecological constraints to development on the site and there are opportunities for ecological benefits to be delivered as part of the development.
Archaeology & Heritage

8.15 The planning application is accompanied by an Archaeological and Heritage Assessment. The results of which have informed the Archaeology and Cultural Heritage chapter of the Environmental Statement.

8.16 The designated heritage assets identified include:

**Grade II listed buildings:**
- Comeytrowe Manor;
- Former Entrance to Comeytrowe Manor;
- Comeytrowe Farmhouse and Attached Farm Buildings to South West;
- Higher Dipford Farmhouse;
- Dipford Farmhouse Barn;
- Higher Dipford Farmhouse;
- The Lawn;
- White Lodge;

**Conservation Areas**
- Trull Conservation Area

8.17 The Archaeology and Cultural Heritage chapter considers the effects of the development on designated and undesignated heritage assets. It concludes that there would be no significant effects on either designated or undesignated assets. However, there will be residual effects on the significance to two designated heritage assets, as follows:

- a moderate/minor direct effect through construction within a small area of the Trull Conservation Area;

- a moderate effect on the setting of the Conservation Area; and

- a moderate/minor effect on the setting of Grade II listed Rumwell Park (HER 40464).
8.18 None of these effects is considered to amount to ‘substantial harm’ to the significance of a designated asset for the purposes of Part 12 of the NPPF.

8.19 The NPPF (paragraph 134) states that where less than substantial harm to the significance of a designated heritage asset is identified, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. A similar, though more brief, statement is contained in TDCS policy CP8 which states that the Council will not permit development which causes harm to the historic environment unless other material factors are sufficient to override their importance.

8.20 The case of Barnwell Manor [2014] EWCA Civ 137 made clear that a finding of “less than substantial harm” does not negative the overarching duty in Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990 (nor indeed by extension the separate duty in Section 71 in relation to Conservation Areas). The implications of Barnwell Manor were summarised in R (on the application of The Forge Field Society and others) v Sevenoaks District Council [2014] EWHC 1895 (Admin) where Mr Justice Lindholm said (at paragraph 48 and 49):

“(…) When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area, it must give that harm considerable importance and weight. It does not mean that an authority’s assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognize, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.”
Applying this to the application proposal, the harm to the Conservation Area and setting of the listed building is considered to be limited, but it nonetheless must be given considerable importance and weight. This creates a presumption against the grant of permission which must be outweighed. It is considered that the public benefits the proposal would bring identified elsewhere in this report, particularly in achieving the Core Strategy’s vision for a mixed use urban extension at Comeytrowe and thereby contributing to meeting the Borough’s housing needs, do outweigh the limited harm to designated heritage assets and the statutory presumption in favour of their preservation. Accordingly, it is considered that, while considerable weight needs to be given to the impact of the proposal on designated heritage assets and the statutory presumptions need to be applied, the benefits of the scheme outweigh those impacts and the planning balance tells decisively in favour of the grant of permission.

Finally, in relation to undesignated heritage assets, following dialogue with SCC officers it was determined that there is still some potential for previously unidentified archaeological features and deposits to be present. These are most likely to be early pre-historic and medieval-modern field boundaries and plough soils, which may likely be addressed via an appropriately worded planning condition.

**Noise Assessment**

A noise assessment has been carried out made of the potential noise and vibration effects of the Proposed Development. The assessment considered the current baseline noise climate and the suitability of the Application Site for the Proposed Development as well as describing the effects of the Proposed Development arising from construction activities and traffic generation. This included the identification of mitigation measures to reduce any noise effects.

A computer model has been used to determine the specification of glazing required to ensure that internal noise levels meet the accepted British Standard 8233 ‘good’ design criteria for proposed residential units. This will ensure that internal noise effects will be negligible.

British Standard 4142 (accepted guidance) has been used to assess the noise from employment uses. Plant noise limits have been recommended to result in an effect of noise from fixed plant that will be acceptable in planning policy terms.
8.26 The increase in road traffic has been assessed at existing dwellings. The effect has been demonstrated to be of negligible significance for the majority of the dwellings. For a limited number of dwellings adjacent to Dipford Road there is a moderate adverse impact.

**Air Quality**

8.27 An air quality assessment has been undertaken to identify the effects of the proposed development during demolition, construction and operation. The Application Site lies approximately 3km away from an Air Quality Management Area (East Reach) declared for exceedences of the annual mean nitrogen dioxide objective (from road traffic).

8.28 Concentrations of nitrogen dioxide and particulate matter have been predicted for a number of locations, representing worst-case residential receptors within the Proposed Development. Predicted concentrations are well below the objectives at all locations. The effects of road traffic emissions on future residents are thus considered to be negligible.

8.29 In order to mitigate any impact of the proposed construction activities bringing about dust nuisance complaints and elevated particulate matter concentrations, mitigations measures will be set out in a CEMP, in order to reduce the risk of effects.

8.30 Overall, the Proposed Development is judged to bring about a negligible effect on air quality.

**Landscape and Visual Impact Assessment**

8.31 The planning application is accompanied by a Landscape & Visual Impact Assessment which has informed that Landscape and Visual Amenity chapter of the Environmental Statement.

8.32 The application site is visually and physically linked to the urban fringe of Taunton being bounded to the east by urbanizing elements of landscape character, including residential development and transport corridors. The A38 Wellington Road separates the Application Site from the wider Vale of Taunton to the north.
8.33 The application site is not, generally, of a particularly high sensitivity with regard to landscape receptors or designation. The exceptions to this are the north-west corner of the site, which is situated within the Stonegallows Ridge Special Landscape Feature, and the south-east corner of the Application Site, part of which lies within the Trull Conservation Area.

8.34 The landscape and visual chapter concludes that, while the Proposed Development would have significant effects on the landscape character of the Application Site itself, it would not significantly alter the character of the surrounding landscape. Furthermore, those effects would reduce quickly with distance (from the site) so that the overall effects on landscape character types would not be significant. In relation to designated landscapes, there would be a would be major/moderate significance adverse effect on a small portion of the Stonegallows Ridge Special Landscape Feature, but this would not affect the role of the Stonegallows Ridge as a landscape feature or its function of providing a visual barrier to Taunton.

8.35 The Stonegallows Ridge Special Landscape Feature is a local designation under saved policy EN11 of the 2004 Local Plan. Policy EN11 itself seeks to avoid harm to the appearance, character and contribution to landscape policy of Special Landscape Features. By contrast, policy CP8 of the Core Strategy seeks the conservation and enhancement of natural environments unless other material factors are sufficient to override their importance. Policy CP8 also seeks that development outside settlement boundaries should protect, conserve or enhance the landscape. By reason of the effect on a small part of the Stonegallows Ridge and changes to the landscape character of the application site itself there is considered to be a limited conflict with policies EN11 and CP8. However, the policies of the development plan should be read as a whole (noting that different policies may pull in different directions) and the proposed development is considered to accord with the development plan as a whole. Furthermore, the identified effects on the landscape are not considered to outweigh the significant benefits of the application proposal, as set out elsewhere in this planning statement.

8.36 In terms of visual amenity the Landscape and Visual chapter notes that the overall visibility of the application site is relatively well contained due to the existing Stonegallows Ridge landform to the west, the urban area of Comeytrowe and Trull to the east and existing tree and hedgerow vegetation within the surrounding areas. The relatively contained nature of the application site therefore ensures that effects are predominantly within localised areas comprising the application site and its immediate context.
8.37 There is likely to be limited visibility from within the wider urban area of Taunton and from other nearby settlements and isolated residences to the north and west. The retention of existing hedgerows and trees along and within the application site boundary, together with the provision of new public open space and planting to the west of the proposed development, will help to integrate the proposed development into the urban and rural context.

8.38 The assessment concludes that the proposed development will have a limited effect on views from the surrounding areas as it would be perceived in the context of the existing urban areas of Comeytrowe and Trull to the east, and within the longer term would represent a well-designed and sensitive extension to the wider settlement. Within the wider landscape, mature hedgerow and tree vegetation and the Stonegallows Ridge help to screen the proposed development from the north, south and west, thus retaining its inherent function within the landscape.

Ground Investigations

8.39 The planning application is accompanied by a Phase 1 Ground Conditions Report. The results of which have informed the Ground Conditions and Contamination chapter of the Environmental Statement.

8.40 In summary, the report concludes that it is unlikely that there are any geo-environmental and geo-technical ground conditions that will have any significant implications for the site layout and land usage of the proposed development.
9.0 S106 HEADS OF TERMS

9.1 Following discussions with TDBC officers, it is understood that, in view of the adopted CIL Regulation 123 List, only the following items will be the subject of S106/278 agreements:

1. Affordable housing
2. Direct site accesses
3. Children’s play space
4. Travel plans

9.2 Negotiations with the Council are ongoing in relation to the delivery of these and other infrastructure items. It is anticipated that updated more detailed heads of terms will be provided as those negotiations progress.
10.0 SUMMARY AND CONCLUSIONS

10.1 The starting point for the determination of the planning application is adopted Core Strategy Policy SS7, which states that:

“Comeytrowe/Trull is a broad location for a mixed-use strategic urban extension for development after 2015 for between 1,000 and 2,000 dwellings up to 2028...”

10.2 This Planning Statement has demonstrated that the application proposals will deliver the requirements of Core Strategy Policy SS7, as summarised below:

- The application site is located within the Taunton Deane Core Strategy (TDCS) ‘Area of Search’ for up to 2,000 new homes at Comeytrowe/Trull, as illustrated by Key Diagram 2 of the TDCS;

- The application proposals provide a comprehensive masterplan for all 2,000 new homes, which is required by TDBC to meet the Core Strategy housing requirement of 17,000 new homes before 2028;

- The application proposals include the necessary infrastructure to support a sustainable mixed-use urban extension of 2,000 new homes;

- The proposals provide a comprehensive masterplan for the entire allocation of 2,000 new homes, which neither requires, nor prejudices potential future wider development to the south-west of Taunton;

- The application represents a sustainable urban extension to Comeytrowe/Trull, which would deliver a new garden community that is sustainably connected and integrated with surrounding areas, providing an attractive place to live and work.

10.3 It is essential that the full allocation for 2,000 homes is provided as part of the application proposal at Comeytrowe/Trull in order that TDBC can meet the aims and objectives of the adopted Core Strategy including the requirement to provide a minimum of 17,000 new homes within the borough, including 4,000 new affordable homes, before 2028.
TDBC's housing trajectory for Taunton identifies the urban extension at Comeytrowe/Trull as delivering all 2,000 new homes from the years 2018 to 2028. Without all 2,000 new homes coming forward at the application site, TDBC are at serious risk of falling short of delivering the minimum target of 13,000 new homes in Taunton before 2028.

The anticipated development trajectory for the site demonstrates that in order to provide all 2,000 new homes before the year 2028 planning permission needs to be granted as soon as possible.

The submission of a planning application demonstrates a realistic delivery of new homes at Comeytrowe/Trull within the plan period and will generate greater certainty that the Core Strategy’s housing targets can be achieved, including helping to ensure the delivery of up to 500 new affordable homes on the site.

There are no environmental or technical constraints to the development of the site. An Environmental Statement accompanies the application, which assesses all technical matters associated with the application and concludes that there would not be any significant adverse environmental impacts as a result of the development.

The application proposals provide for up to 2,000 new homes on land that has been identified as an appropriate, logical and sustainable urban extension to the south west of Taunton. Granting planning permission would be a significant benefit to the local community including:

- The delivery of up to 2,000 new homes for the Taunton Urban Area including a variety and mix of housing size, helping to meet Taunton Deane’s housing requirement over the plan period;

- The provision of up to 500 new affordable homes, for local people;

- The delivery of up to 5.25 hectares of new employment land, providing opportunities for local businesses wishing to locate within Taunton and helping meet local demand for business premises;

- The proposed development could be expected to generate 3,300 jobs over the 14 year build-period, equating to 236 jobs per year for the Taunton area;
- The creation of strong and vibrant communities by providing well designed housing and attractive places for people to live;

- Enhancing of the natural environment, helping to improve biodiversity and the local landscape through the creation of habitats and the planting of trees;

- The promotion of sustainable transport via the integration of cycle routes and footpaths into the development;

- The provision of allotments for the use by future residents to encourage local food productions and enhance a sense of community;

- The provision of high quality public open space, recreational areas, local and neighbourhood equipped areas of play (3 no. LEAPs and a NEAP) will promote play and exercise.

10.9 The application proposal is therefore in accordance with development plan policy and would deliver the sustainable comprehensive mixed use urban extension that Taunton needs. The application should, following NPPF paragraph 14, be approved without delay.
Appendix A
Location Plan