



CONSULTATION STATEMENT

Somerset West and Taunton Council: District Wide Design Guide Supplementary Planning Document (SPD)

The Town and Country Planning (Local Planning) (England) Regulations 2012

Introduction

Somerset West and Taunton Council (the Council) is producing a Districtwide Design Guide Supplementary Planning Document (SPD) which seeks a step change in the quality of new development in the district and provides additional guidance on how relevant policies of the adopted development plan should be responded to in relation to securing high quality design. A draft Design Guide SPD was considered by the Council's Executive meeting on 28 January 2020 and approved for public consultation. Following consultation in spring 2020 and again in winter 2020/21 on an expanded 'Streets, Parking and Placemaking' section, the Council has made several amendments across the document in response to comments received. The Council is now consulting on an updated draft of the SPD.

This Consultation Report explains how the Council is undertaking public consultation to inform the development of the SPD, and how the engagement, feedback and responses received to date have influenced its development. The report covers: Which bodies and persons are being invited to make comments; How those bodies and persons are invited to make comment; The material that was subject to consultation; A summary of the responses received to date; and A summary of how the responses influenced the development of the SPD.

The Council has an adopted Statement of Community Involvement (SCI). The SCI outlines that the Council is committed to effective community engagement and seeks to use a wide range of methods for involving the community in the plan making process. SWT's Statement of Community Involvement was adopted in November 2019. In relation to plan preparation, the SCI relates to the preparation of Development Plan Documents (DPDs), Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA), Supplementary Planning Documents (SPDs) and Neighbourhood Plans. As such, the SPD is required to comply with the SCI.

The Town and Country Planning (Local Planning) (England) Regulations 2012 set out what is required in terms of public participation and the making of representations in relation to the production of SPDs. As part of this process, the Council must make a Consultation Statement available for public consultation alongside the SPD itself. This Statement complies with these Regulations.

Consultation Summary

Consultation on an updated Districtwide Design Guide Supplementary Planning Document (SPD) will take place from 05 July 2021 until Monday 16 August 2021 (six weeks). In accordance with Regulation 12(b)(i) of the Town and Country Planning (Local Planning)(England) Regulations 2012, consultation responses must be submitted within this time period in order to be taken into consideration.

The documents available to comment on as part of this consultation include the following:

- Updated Draft Districtwide Design Guide SPD;
- Draft Strategic Environmental Assessment / Habitat Regulations Assessment (SEA/HRA) Screening Report; and
- Consultation Statement

By its nature, the draft Design Guide document is a technical and text heavy, though officers have tried through graphics to ensure that it is as accessible as possible considering its nature and purpose.

Purpose of the Consultation

This updated draft of the SPD has been produced as a response to a number of the issues raised in consultation on the previous draft, particularly in relation to the climate emergency and how this is integral to high quality design.

As such, the purpose of the consultation is four-fold:

- To seek views of stakeholders and raise awareness in relation to the proposed amended design guidance,
- To ensure that the final SPD has been informed by a demonstrable level of public engagement and input as expected by the Planning Practice Guidance
- To ensure legal compliance with relevant Regulations and to ensure statutory consultee consultation in relation to the Draft SEA/HRA Screening; and
- To provide notice to the development industry, of the Council's design guidance and that as SPD it will influence planning decisions where it is a material consideration.

Who We Are Consulting

A list of Specific Consultation Bodies, General Consultation Bodies, and other organisations and groups the Council seeks to involve in plan-making is included in the SCI. As a non-statutory plan, there is no statutory list of bodies and organisations that the Council is required to consult in preparation of the SPD. However, in accordance with Regulation 13(1) of the Town and Country Planning (Local Planning)(England) Regulations 2012, any person may make representations about an SPD. As such, all those on this list have been included in this exercise.

The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) and the Conservation of Habitats and Species Regulations 2010 (Habitat Regulations) set out that Historic England, the Environment Agency and Natural England are statutory consultees in relation to the Draft SEA/HRA Screening Report and as such these bodies are specifically being invited to respond to this element.

The Council is committed to ensuring that local groups, organisations, and individuals are

provided with the opportunity to be involved in the preparation of planning policy documents.

The Council has a database of consultees, who have either commented upon, or expressed an interest in being involved with the development of local plans. This database is used to keep individuals, companies and organisations informed on the production of the Local Plan and other planning policy documents. New consultees are added to the consultation database via e-mail or letter to the Strategy Team requesting inclusion on to the database. The General Data Protection Regulations are followed to ensure that personal data is only required and retained where proportionate and necessary, is only gathered where explicit consent has been provided, is kept securely and is not disclosed to others. All bodies and persons identified within this database were emailed with notification of the consultation.

How We Are Consulting

Consultation on the updated Draft Districtwide Design Guide SPD will run from 05 July 2021 until Monday 16 August 2021. During this time a variety of methods will be employed, though the full range of methods has been limited by definitive restrictions and a cautiously proportionate approach considering the ongoing Coronavirus pandemic and gradual loosening of lockdown restrictions.

Responses to the consultation can be made:

- Online via the Council's consultation portal at https://yoursay.somersetwestandtaunton.gov.uk/consultation_finder/
- By email: strategy@somersetwestandtaunton.gov.uk
- By writing to the Council at: Placemaking Specialist, Planning and Development, Somerset West and Taunton Council, Deane House, Belvedere Road, Taunton, TA1 1HE;

To publicise the consultation, the Council is:

- Emailing notification of the consultation to all bodies and persons identified within the consultation database.
- Making the above consultation documents available for inspection at the following locations:
 - Deane House, Belvedere Road, Taunton, TA1 1HE (Monday – Friday, 8.30am to 5pm)
 - West Somerset House, Killick Way, Williton, TA4 4QA (Monday – Friday, 8.30am to 5pm)

For any viewing of the document at Deane House or West Somerset House, due to Covid restrictions, please call to make an appointment 0300 3048000.

- Publishing the documents on the Council's website at <https://www.somersetwestandtaunton.gov.uk/planning-policy/districtwide-design-guide-spd/>
- Publishing a press release via the Council's website and social media posts via Facebook, Twitter and LinkedIn raising interest, communicating the consultation and encouraging participation.
- Presenting to the Agents Forum – 12 July 2021
- Presenting to the Taunton Design Circle – 28 July 2021

- Presenting to the Somerset Affordable Housing Group – 22 July 2021
- Hosting a Town and Parish Councils Event – 13 July 2021
- Holding a General Question & Answer Session for Members of the Public – 14 July 2021 between 12.30 – 4.30pm

If you wish to attend one of these sessions or to make an appointment for the General Question & Answer Session for Members of the Public, please contact us on 0300 3048000 or email: strategy@somersetwestandtaunton.gov.uk

In light of the current restrictions and gradual re-opening of society and the economy, it has been decided not to arrange any in-person consultation events as would normally take place.

The consultation documents can also be viewed online at all libraries in Somerset West and Taunton (please check with the library in question for their opening times).

Previous Consultations

The Design Guide was initially subject to consultation from 3 February to 30 March 2020. Due to the covid pandemic, several consultations were significantly delayed including Somerset County Council (SCC). Following an objection from SCC Highways, detailed discussions took place in a series of workshop sessions between Somerset West and Taunton and SCC as the Highway Authority.

As a result, on discussions with the Highway Authority, a second formal consultation was carried out on the Design Guide from 11 December to 5 February 2021 on an expanded section in the Design Guide 'Streets, Parking and Placemaking'.

During both previous consultations a number of methods were employed - the Council's consultation portal survey, by email and by post. All organisations, groups and individuals on the Council's Local Plan data base were notified of the consultation by the Strategy Team. In addition, press releases were issued by the Council's Communication Team and the consultations promoted on social media. The Design Guide was available on the Council's website and a copy was also available for inspection at the Council's office at Deane House, Belvedere Road, Taunton.

In addition, presentations on the Design Guide were carried out on 12 February 2020 at a CPD event for built environment professionals in Taunton, and for housing enabling providers on 27 February 2020. Also, a presentation on the Design Guide was also given to the Council's Agents Panel on 11 December 2020.

Most of the consultees welcomed the Design Guide SPD and were impressed with its attractive layout, illustrative material and its ambition to improve the standard of design. It was particularly welcomed as some consultees considered that the standard of design in the district was generally mediocre and lack local distinctiveness.

A total of 43 representations from members of the public, amenity bodies, parish councils, developers and internal staff were received during the consultations on the overall Design Guide. 40 representations were submitted via the Council's consultation portal and 3 via email.

Of the 36 respondents, 4 were from volume house builders already developing major sites in Taunton. The detailed comments from volume house builders (which often overlap)

can broadly be summarised under the following headings – a) Viability; b) Level of Prescription; c) Local Distinctiveness; and d) Relationship with SCC Highways and parking. The issues raised and the responses are set out below:

- a) Viability – the house builders urged that the Design Guide should recognise the relation between what is recommended and required against the financial viability of housing development.

In response, the Council consider that the value of having Design Guides and Codes is that they provide a level playing field for developers to understand the costs which are likely to be incurred and to take this into account in their land valuations. The main thrust of the design guide is to make efficient use of sites and plots to ensure optimum utilisation of land; this is particularly so in advocating the reduction of land-take for highways. Moreover, all the planned footprints of the indicative schemes show very simple and therefore cost efficient plan shapes. Additionally, the government commitments to early carbon neutrality and the climate emergency are creating significant challenges for the development industry and these are reflected in SWT's policies and consequently the Design Guide as SPD.

- b) Level of Prescription – the house builders urged that the Design Guide should avoid being over prescriptive in terms of design and style.

In response the Council considers that the challenge for any Design Guide is to strike a balance between seen to be vague in its requirements and on the other hand to be interpreted as being over prescriptive. The approach taken by the Design Guide is in all cases to show indicative illustrations which demonstrate how objectives might be encapsulated in built form. But at the outset of the Design Guide it stresses that alternative contemporary solutions would be valid if they demonstrate that the design process advocated has been thoroughly undertaken. Furthermore, the illustrations depict relatively style neutral built form in order to explain layouts/concepts.

- c) Local Distinctiveness – the house builder recommended that the advocacy of local distinctiveness should recognise interwar suburban forms of housing as a locally distinctive feature of Taunton.

In response the Council considers that the advocacy of creating locally distinctive built environments has been a constant theme of planning legislation in the post war era and is reiterated in the NPPF and the National Design Guide. It is further reinforced in numerous places in the Local Plan. The Design Guide identifies aspects of local distinctiveness relevant in the SWT area. It avoids identifying styles and forms found in any urban location in the country as by definition these are not locally distinctive. Furthermore, in the case of interwar suburban development, this tends to be road dominated and low density and militates against active travel and the efficient use of land. The challenge for both the Design Guide and the developer is to identify aspects of topography, layout, and materials which are both relevant for good placemaking and which respond to but not mimic solutions to local contexts.

- d) Relationship with SCC Highways and parking – The developers raised the issue of the potential divergence of aims and approaches between SCC Highways and SWT's planning team.

In response the Council considers that as part of preparing the Design Guide, it is recognised that there is a tension between the conventional highway prescriptions based on the 1991 Highway Authority Standards and those now advocated in Manual for Streets and the publications emanating from CIHT. As this latter

approach is now advocated by the National Design Guide and is recognised now by SCC in their proposed draft new highway standards, these differences should be minimised. Indeed, the Design Guide Team and a working party of SCC Highway officers embarked on a series of workshops to agree a common approach and design principles based on recently developed best practise. In regard to parking the developers urged that parking spaces should be located close to front doors; this is agreed and the advocacy of parking streets and squares should ensure that parking spaces are close to and easily observed from nearby houses. The Highway Authority also advocates contextually based parking standards related to the varied location of developments within the district and the relative accessibility to facilities by active travel and public transport. This approach is endorsed by the Design Guide and should give developers appropriate flexibility.

Others comments received from residents, parish councils, amenity bodies etc, can broadly be summarised under the following headings – a) Importance of local distinctiveness; b) Need for active travel and well connected places; c) Need for new development to be as low carbon as possible and d) support for the Design Process.

- a) Importance of local distinctiveness – the majority of public responses strongly agreed that local distinctiveness is important 'to keep harmony and keep the character of the local areas'. This also highlighted the importance of character areas which recognised that these are important and that their features need to be addressed in design and layout. Strongly support was also given for the joint principles of placemaking and sustainability. development.
- b) The need for ensuring active travel and well-connected places was urged by a number of respondents. In addition, the provision of cycle and footpaths with existing roads is seen as important to create developments with an integrated movement network.
- c) Low carbon developments was raised by a number of respondents – with a number of respondents seeking low carbon developments and a desire for new housing developments to be carbon neutral. Creating more sustainable developments was seen as a priority for many respondents.
- d) Support for the Design Process – numerous respondents mentioned that they strongly agree with the broad aims of the Design Guide and support the design process advocated.

In addition to comments from external respondents, other specialist officers from the Council provided consultation comments. Representations requested greater emphasis on a) zero carbon in the form of an extra topic, b) the development of smaller sites in order to expand the existing guidance in this area to smaller scale developments, c) agricultural buildings to reflect the rural character of the district,

You said, we did

The updated Draft Districtwide Design Guide has taken into account the responses received to date and the following substantial revisions and additions have been carried out as a result:

- Section 1 – Introduction – this includes National Planning Policy including the National Design Guide and all the relevant existing Somerset West and Taunton policies which form the basis of the Design Guide
- Section 3 – Context & Distinctiveness – this includes a revised introduction to Fig 3.3c and a redrawing of a map showing local vernacular building materials

- Section 4 – Sustainable Placemaking - new guidance has been included on Residential Blocks at section 4.2.1
- Section 4 – Sustainable Placemaking – enhanced guidance has been included on Buildings Within the Landscape Setting at section 4.2.3
- Section 4 – House Typologies – these have been revised and expanded upon to clarify the guidance and to improve the illustrations.
- Section 4 - Sustainable Placemaking - a much expanded section has been included on Streets, Parking and Placemaking based on more progressive approaches to street design at section 4.4.
- Section 5.2 – Zero Carbon Design and Construction – a new detailed section has been included setting out the Council's aspirations in relation to policy and coordinating guidance within the Design Guide.
- Section 5.15 - Residential Alterations and Extensions has been revised and expanded on both to clarify the distinction between permitted development and that which requires planning permission.
- Section 5.14 - Shop front Design has been expanded to include guidance on the changing high street in terms of the conversion of retail premises to alternative uses.
- Section 5 - Design Topics, new sections have been added to address the development of smaller sites (new section 5.4) and the Design of Agricultural Buildings (new section 5.12).
- Section 6 - Design Review has been revised to set out the Council's proposed procedure and requirements for developments which will be invited to Design Review Panel

A number of smaller changes have also been carried out as a result of consultation responses and these are also set out below:

- The Introduction now clarifies the role of illustrations within the design guide and the fact that these are indicative only, not implying a preference for particular architectural styles.
- Section 3.1 of Context and Distinctiveness has been revised to show the importance of promoting a design approach which is responsive to local distinctiveness without resorting to superficial stylistic treatments. This is also in response to a number of representations, both within this consultation period and other Garden Town events, where participants encouraged the Local Authority to ensure that all developments should reflect local distinctiveness.
- Additional clarification has been applied throughout the text to reinforce the aims of the design guide that it should be relevant to considerations regarding:- the incorporation of modern methods of construction; the importance of landscape for tackling climate change and encouraging biodiversity and aiding a sense of wellbeing, and the inclusion of active travel within developments.
- The update of policy and guidance e.g. change from Building for Life 12 to Building for a Healthy Life