



Examination of the West Somerset Local Plan 2032

Written statement on behalf of The Crown Estate, Representor ID 18
(February 2016)

Matter 3: The Plan Strategy and the Delivery of Affordable Housing

Issue 1. The points raised in my initial letter to the Council (ED3) at paragraphs 18 to 35, including the questions in that final paragraph, have not been fully answered by the Council in its subsequent correspondence (ED4, ED8 and the papers to the Local Development Panel on 25 November 2015). Having regard to those questions is the strategy on which the Plan is based the most appropriate of those considered to deliver the required market and affordable housing?

The Crown Estate's response

1.1.1 The delivery strategy on which the Plan is based is unsound and will not deliver the required market and affordable housing, contrary to NPPF Paragraph 47, for the following reasons.

Lack of evidence and justification regarding Full Objectively Assessed Housing Needs (FOAHN)

1.1.2 The lack of evidence and justification in support of the FOAHN undermines the Plan's strategy and the ability to deliver both market and affordable housing. In The Crown Estate's response to Matter 2 we outline how at present the FOAHN does not address 'market signals' and the need for an upward adjustment to address affordability problems in the HMA, as required by National Planning Practice Guidance (NPPG) (NPPG (ID 2a-019)).

A flawed Sustainability Appraisal (SA) process

1.1.3 The SA considered a range of options and concluded that Strategic Option 1 (upon which the Submitted Plan is based) will make just a "limited contribution" to meeting affordable housing needs. Given how critical affordability is in the HMA, there is a lack of justification as to why this option was selected, particularly in the context of the NPPF and boosting significantly the supply of market and affordable homes.

1.1.4 In addition, the SA contains a critical flaw in appraising the sites proposed for allocation. The SA concludes that all of the strategic sites proposed for allocation will achieve local policy requirements for affordable housing when this is clearly not the case. The Strategic Housing Viability Assessment underpinning the Plan (2014) (page 24) states that "*viability is compromised for the larger development scenario of 250 dwelling units and thus **provision for affordable housing would need to be lowered to ensure such strategic housing sites enter the development pipeline in the Local Plan period***" (emphasis added).

1.1.5 The Plan is clearly unsound in the context of boosting significantly the supply of market and affordable homes, given that the strategy fails to properly consider affordable housing delivery as part of the site selection process and SA. Some 50% of growth is allocated in the Plan to come forward on three strategic sites where affordable housing provision will be compromised. In



addition, there is little certainty that the strategic sites will be able to deliver what is required, given the lack of evidence regarding infrastructure requirements and phasing in the submitted plan.

Issue 2. Is it justified by the evidence base?

The Crown Estate's response

- 1.1.6 For the reasons explained in response to Issue 1, it is our view that Plan is not justified by the evidence base and that, in addition, there are critical failings with the SA process.

Issue 3. The Housing and Planning Bill will be enacted during the life of the Plan and, perhaps, prior to its adoption. Assuming that the provisions of the Bill and particularly Part 1 remain largely as set out are the policies of the Plan sufficiently flexible to allow the required starter homes and self-build and custom house building to come forward? If not, what changes are required?

The Crown Estate's response

- 1.1.7 The ability to deliver starter homes, self-build homes and custom house building will be dependent on having a range of deliverable and developable sites.

Issue 4. Having regard to the Sustainability Appraisal (SD11 to SD15) and the November 2015 Addendum and Appendix is the selection of strategic and, especially, early release sites justified by the evidence and, if not, what should be done by way of correction?

The Crown Estate's response

- 1.1.8 The approach is not justified given the significant flaws in the Council's evidence base, in particular the SA process and how this has informed the Plan. In response, the Council needs to fully reconsider the spatial strategy and options, based on a clear and robust understanding of the FOAHN (see The Crown Estate's response to Matter 2).
- 1.1.9 Once the FOAHN has been identified, spatial options need to be tested through SA alongside a proper consideration of how affordability challenges can be addressed. Through this process, it is clear that an alternative option to consider would be the allocation of several smaller sites (say 50-100 units) across the district, which have lower infrastructure costs and a greater ability to meet local affordable housing policy targets. These sites may also better suit local/regional housing developers, given that major volume housebuilders (those typically with experience in delivering larger sites and urban extensions) do not typically operate in West Somerset. This option should at least be tested through the plan-making process given how critical an issue affordability is for West Somerset's communities.
- 1.1.10 Retrospectively seeking to allocate land for an additional 245 dwellings, does not address the fundamental failing of the Plan; a reliance on 50% of the Plan's housing growth on just three strategic housing sites where affordable housing provision is constrained and delivery as a whole is unproven (given the lack of evidence on infrastructure requirements, phasing and lead-in times).

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