



Examination of the West Somerset Local Plan 2032

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

Matter 4: Housing Supply

Issue 1. The strategic sites allocated would deliver about 50% of the 2900 dwellings planned for. A further 245 dwellings would come from early release sites with the remainder (some 1200 dwellings) from windfalls. Are the assumptions made about the balance between the three robust and, if not, why not and what should be done by way of correction.

The Crown Estate's response

- 1.1.1 A reliance on just three strategic site allocations to deliver some 50% of the planned growth presents significant risks to the Plan's delivery, particularly given the lack of detail regarding infrastructure provision, lead-in times and the inability of these sites to meet affordable housing policy targets. To then rely on 40% of planned growth coming via windfalls provides further risks and a lack of certainty as to how market and affordable housing is to be delivered. The retrospective introduction of 'early release' sites for just 245 dwellings does nothing to rectify the lack of certainty regarding strategic site delivery and inability to address affordability. The overall lack of specific site allocations over the plan period also limits the Council's ability to achieve its housing trajectory and maintain a five year housing land supply, as explained in response to Issues 2 and 3 below.

Issue 2. The housing trajectory (EB17) would not provide the number of dwellings required by the Plan until 2018-19. Is the way the trajectory is presented appropriate for the Plan?

The Crown Estate's response

- 1.1.2 This trajectory is not appropriate for the Plan, since it will not help to "*boost significantly*" the supply of housing in accordance with the NPPF. A sufficient supply of deliverable sites would enable housing needs to be met from the start of the plan period, ensuring that both market and affordable housing needs can be met. The current trajectory shows the inherent risks with relying on three strategic allocations given the lead-in times to delivery and should one of these sites be delayed. Without a pool of other allocations to draw on, the Council loses its ability to achieve its housing trajectory and maintain a deliverable supply of housing (see also response to Issue 3).
- 1.1.3 We also doubt that the housing trajectory as currently proposed is deliverable, particularly given the lack of evidence regarding strategic site delivery and infrastructure requirements. Delivery concerns are exacerbated by the lack of major volume housebuilders operating in West Somerset, developers who typically have the skills and expertise to bring forward sites like this (e.g. it is the major housebuilders who are bringing forward strategic urban extensions in neighbouring Taunton Deane).
- 1.1.4 As explained in response to Matters 2 and 3, a much better approach would be to allocate several sites which are capable of delivering say 50-100 dwellings, which have lower infrastructure costs

and a greater ability to achieve affordable housing targets. These sites would also have less of a lead-in time and could more easily help the Council to achieve its housing trajectory and maintain a five year supply. On The Crown Estate's landholding at Dunster Marsh, they appointed a local developer, Strongvox Homes (following the grant of outline planning permission) to build 54 homes, including 11 affordable units. Strongvox secured reserved matters approval in late 2015 with construction now underway, first sales expected in July 2016 and scheme completion due by November 2017. It is this type of scheme, undertaken swiftly by a local developer and with limited infrastructure requirements, that is more likely to be effective in helping the Council achieve its housing trajectory and maintain a five year deliverable land supply. Having a pool of deliverable sites like this to draw on will enable the Council boost significantly the supply of housing in accordance with the NPPF and ensure a deliverable Plan.

Issue 3. What are the implications for the five year supply of housing against the requirements and how should they be addressed?

The Crown Estate's response

- 1.1.5 Notwithstanding the need for a proper understanding of the Full Objectively Assessed Housing Need (FOAHN) on which to base the five year supply of housing land (see The Crown Estate's response to Matter 2), the Council's approach to land supply clearly limits the ability to maintain a 'rolling' supply over the plan period as a whole. The currently quoted '5.1 years' is in essence a short term solution to providing a 5-year supply during the Plan's examination. It leaves the Council with little flexibility to bolster supply over the plan period should one or more of these sites be delayed or if additional sites are needed.
- 1.1.6 As explained in 1.1.3, the allocation of several smaller deliverable sites of say 50-100 dwellings, rather than the reliance on three main strategic sites, will enable the Council to react more quickly and release additional sites should they need to do so. The allocation of sites like this will also enable wider plan objectives, particularly affordable housing delivery, to be more easily addressed.

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