

February 2016

West Somerset Local Plan Examination
Pre-Hearing Statement on behalf of Summerfield
Developments (SW) Ltd - Representor No. 15
Matter 3: The Plan Strategy and Affordable Housing



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1.0 Introduction

- 1.1 This pre-hearing statement is submitted on behalf of Summerfield Developments (SW) Ltd. Summerfield Developments (SW) Ltd has submitted duly made representations in response to each of the consultation stages of the draft Plan and welcomes the opportunity to participate in the examination hearings.

2.0 Comments on issues raised by the Inspector

Is the strategy on which the Plan is based the most appropriate of those considered to deliver the required market and affordable housing?

- 2.1 Summerfield Developments (SW) Ltd considers that it is essential that the Plan's strategy for actually delivering housing, including affordable housing, is robust given the extent of the affordability issue that exists in West Somerset. However, we are concerned for a number of reasons that the Plan will fail to achieve this.
- 2.2 Firstly, given the affordable housing need, Summerfield Developments (SW) Ltd has consistently expressed its concerns to the Council that it is only proposing to allocate sites within the Plan to deliver approximately half of the proposed housing requirement. We therefore welcome the recent, but belated, identification of some early release sites. However, this identification of additional land for allocation does not go far enough to fully address our concerns that, to reflect national policy requirements, the Plan should seek to identify sites to deliver as much of the proposed housing requirement as possible. It is not that there are no other sites that could be allocated. Sites that are suitable for delivering housing have been continually overlooked for no apparent good reason.
- 2.3 Linked to this, we are also concerned that the Plan as currently proposed will not help the Council to demonstrate an adequate five year housing land supply. We have identified in our statement in respect of Matter 4 that, even with the introduction of the early release sites, the Plan will not deliver an adequate five year supply. This is a consequence of the Plan failing to identify sites to deliver the majority of the housing requirement. In our view, this makes the Plan unsound and in order for it to be made sound, the Plan should allocate

more land to deliver the requirement. This would provide greater certainty, increase the 5 year supply and help to deliver the affordable housing needs which are a key objective of the Plan.

- 2.4 The absence within the Plan of site allocations that address more than only approximately half of the housing requirement creates uncertainty over how the Council will be able to maintain its housing supply. This conflicts with the NPPF's core principles which require that *"plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities"*.
- 2.5 Given that it does not propose to allocate sufficient land, it is surprising that the draft Plan also fails to indicate how land which is not allocated, and yet required to meet the overall housing requirement, will be identified. This provides a great deal of uncertainty for decision makers and developers when assessing the potential for development of land not allocated in the plan.
- 2.6 The Council's apportionment of housing provision within the District seeks to direct 20% of the housing requirement, which equates to 30 dwellings per annum, across the primary and secondary villages within the District. We consider this figure to be disproportionately high, especially as the draft Plan acknowledges that most of these settlements are generally unsustainable locations for anything other than very small scale housing. This conflicts with local and national priorities, which includes seeking to deliver development in sustainable locations (i.e. Minehead, Watchet and Williton), the growth of which would support better self-containment and shorter commuting distances. We consider that a more significant proportion of the housing requirement should be directed to the main settlements which are better served by transport links and local amenities in line with local and national priorities.

Is it justified by the evidence base?

2.7 In its previous representations, Summerfield Developments (SW) Ltd has raised concerns over the adequacy of the evidence base which has informed the plan and been available during the consultation stages, rather than being prepared retrospectively to support the draft Plan.

2.8 The belated publication of the Sustainability Appraisal (SA) and other evidence base documents are welcomed but it is hard not to conclude that these have been prepared in retrospect. Even now these provide very little detail about how alternative options, particularly alternative options to the proposed strategic sites, have been assessed or to explain the Plan.

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 base and, if not, what should be done by way of correction?

2.9 Summerfield Developments (SW) Ltd has commented in some detail within its previous representations about its concerns over the process that has been followed by the Council in its selection of strategic sites and how these have not been justified by the available evidence base. We do not repeat those comments here but we reiterate some of those concerns in our statements on other Matters.

2.10 We remain of the view that it would be appropriate to direct a greater proportion of the overall housing requirement to Watchet and Williton and that there is capacity within those settlements to allocate additional land.

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