

West Somerset Local Plan Examination
Pre-Hearing Statement on behalf of Summerfield
Developments (SW) Ltd - Representor No. 15
Matter 4: Housing Supply



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Planning

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

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?

- 2.1 We have commented within our statement in respect of Matter 3 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 suitable sites that could be allocated. 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.
- 2.2 The Council places a great reliance on windfall development, citing past delivery from so-called windfall sites as justification. However, in recent years at least, the windfall figures that the Council will be relying upon includes a significant yield from sites that have come forward on the back of the Council being unable to demonstrate an adequate five year housing land supply. This distorts the figures and makes them far less reliable.
- 2.3 An over-reliance on windfall sites not only creates uncertainty for developers and the local community over where development should occur but also means that infrastructure requirements cannot be adequately planned for and makes it harder for the Council to robustly demonstrate an adequate five year supply. This is not positive planning and in our view makes the Plan unsound.
- 2.4 We believe that the Plan should seek to allocate more land and be less reliant on unpredictable windfall requirements.

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

- 2.5 The proposed housing requirement for the plan period (2012 – 2032) is “*about 2,900 new homes*”. This represents an average annual requirement of 145 dwellings.
- 2.6 Taking the Council’s own figures, 67 were completed in 2012/13, 84 in 2013/14 and 155 in 2014/15. This is already 129 dwellings below the minimum number required to be delivered within the same period. In accordance with the Planning Practice Guidance’s advice that the Sedgfield method should be applied, this needs to be added to the 725 dwellings which is the minimum number required to be delivered over the next 5 years (15/16 – 19/20). The basic five year requirement is therefore a minimum of 854 or 171 per annum.
- 2.7 The NPPF also requires that an additional 5% buffer is added to a five year housing supply to ensure choice and competition in the market. Adding a 5% buffer to the basic 5 year requirement identified above would mean 897 (179 pa) dwellings should be delivered in the next 5 years.
- 2.8 Based on the Council’s housing trajectory, the Council considers that its five year (15/16 – 19/20) supply is 790 dwellings, including the interim release sites and a projected windfall allowance. This would not be sufficient to deliver an adequate five year supply at the adoption of the Plan even if it was accepted, which we don’t, that all of the claimed supply is deliverable within five years.
- 2.9 There are significant doubts over the deliverability of sites which have planning permission but are yet to come forward and the Council’s projected yields from some of its strategic sites - as identified in our statements on other Matters - when assessed against the criteria set out in the Planning Practice Guidance which states that,

“planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.

The examination of Local Plans is intended to ensure that up-to-date housing requirements and the deliverability of sites to meet a five year supply will have been thoroughly considered and examined prior to adoption, in a way that cannot be replicated in the course of determining individual applications and appeals where only the applicant’s/appellant’s evidence is likely to be presented to contest an authority’s position.”

- 2.10 On the basis of the above, it is considered that the Plan will not provide the Council with an adequate five year housing land supply and for that reason must fail the tests of soundness.

- 2.11 In order to address this deficiency the Plan should allocate more land to meet its housing requirements and to address its five year supply.

T 01823 334 283

E enquiries@collierplanning.co.uk

W www.collierplanning.co.uk



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