

# HEARING STATEMENT ON BEHALF OF SOUTH WEST STRATEGIC DEVELOPMENTS

## MATTER 4: HOUSING SUPPLY

*'Q1: 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?'*

- 1.0 Our main concern in respect to this issue is the large proportion of sites expected to come forward as part of a windfall allowance. This allowance is given at 1,280 dwellings which equates to 44% of overall supply.
- 1.1 Whilst we acknowledge that historically West Somerset have delivered a large proportion of dwellings via windfall development, this is a finite supply of housing land and the LPA cannot be certain about how and when development of this nature will come forward by simply using past historic trends.
- 1.2 This limitation is actually acknowledged in the Housing Topic Paper published by WSC in January 2015, paragraph 58 which states that: *'The supply of potential sites to support windfall development within existing settlements with development limits is not inexhaustible and, once developed, the options for further development on the same site are significantly reduced'*.
- 1.3 Such a large proportion of sites being delivered as windfalls is unprecedented in our experience. Recent examinations we have attended in respect to emerging plans in comparable rural districts such as South Somerset and North Dorset made windfall allowances, including infill development, as 10% in both Local Planning Authorities and therefore significantly lower than the proposed allowance in West Somerset.
- 1.4 Furthermore paragraph 58 of the Housing Topic Paper also states that *'because of the small-scale of the individual developments, they are unlikely to contribute, individually or collectively, through S106/Planning Obligations agreements, towards the provision of necessary infrastructure improvements that may be required close to where the development takes place'*. This is another limitation of reliance of such a high proportion of windfall sites to deliver the

supply of housing. Such piecemeal development, if indeed possible at the levels projected, will not adequately provide supporting infrastructure. It is therefore necessary to promote further allocations to ensure that infrastructure and obligations can be secured to improve facilities in the main strategic locations promoted for development.

1.5 Therefore aiming to deliver approximately 44% of the overall housing target in West Somerset is entirely inappropriate and the historic high levels of windfall development is more likely to be a consequence of a lack of planning including identifying appropriate allocations within the adopted 2006 Local Plan. The new proposed Local Plan cannot be deemed to be '*genuinely planned*', a key requirement of the NPPF, if WSC do not propose a further allocation of interim sites beyond those that have already been identified and rely on such a high proportion of Windfall sites. Decisions as to how development will be planned and deliver suitable infrastructure alongside it must be made as part of the plan by identifying specific sites.

1.6 We advocate that a windfall allowance of around 600 dwellings (20% of the overall supply) would be more appropriate with other dwellings being planned via allocations as part of an expanded list of early release sites and a new strategic policy for Watchet. As set out in respect to matters 3 and 6 we propose that land identified in appendix A as a suitable candidate for strategic allocation, but also as an early release site because it offers immediate opportunities to contribute towards the existing five year land supply deficit.

*'Q2: 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?'*

1.7 We consider that the list of early release sites should be expanded to include additional land at Watchet as we have identified elsewhere. This will help expand the potential sites that could contribute housing completions in the early phases of the plan period.

*'Q3: What are the implications for the five year supply of housing against the requirements and how should they be addressed?'*

1.8 At the current time we have no confidence that the policy proposals put forward are credible in respect to providing a robust and flexible five year housing supply. Therefore the plan cannot be found to be sound at the current time.

1.9 We would reiterate our previous concerns raised via our representations in March 2015 regarding the buffer of 5% being added to the five year housing requirement. It is our view that West Somerset should increase the buffer to 20% due to a persistent under delivery of homes in this plan period and prior to this. Furthermore we do not agree with the Liverpool method being

adopted to deal with the backlog identified since the beginning of the plan period as special circumstances do not exist that warrant this approach.

- 1.10 The substance of the majority of appeal decisions on the subject and the thrust of the NPPF policies requires that Local Authorities should aim to address their shortfall from the beginning of the plan period within the first five years, further underlining that the Sedgefield method should be used unless exceptional circumstances dictate otherwise.
- 1.11 We consider that no such exceptional circumstances exist, the UK and WSC are experiencing very high levels of housing price inflation and accessibility to housing is deteriorating for the majority of people. The only potential impact of adopting the Sedgefield method and boosting housing supply now, is that supply over and above the identified requirements would be delivered. However, the impact of this would be far less significant than the alternative, which would result in worsening conditions in housing affordability.
- 1.12 We consider that unless the appropriate buffer is applied to the requirement and the Sedgefield approach adopted to ensure the delivery of homes, the policy proposals put forward cannot be found credible and therefore the plan will be found to be unsound in relation to five year housing supply.