

Home Builders Federation  
Respondent No.  
Hearing Session : Matter 3

## WEST SOMERSET LOCAL PLAN EXAMINATION

### INSPECTOR'S MATTERS AND ISSUES

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

**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?**

**2. Is it justified by the evidence base?**

In its latest evidence (EB8) the Council describes 3 housing market sub areas within its administrative boundary comprising Coastal fringe & 3 largest settlements (where 60% of population live), Exmoor National Park (where 25% population live) and dispersed rural area (where 15% of population live and Hinckley Point is located). The Local Plan only covers two of these sub markets by the exclusion of the National Park.

The strategy proposes to direct almost all development to Minehead / Alcombe (main centre) and Watchet & Williton (rural service centres) with a minimum of 1,450 dwellings (50%) on strategic sites and the remainder on windfall non-strategic sites. Only circa 105 dwellings will be permitted in primary and secondary villages in accordance with Policy SC1 definitions of limited and small scale development.

The proposed strategy is unlikely to be effective in meeting housing needs because of the dependency of delivery on such a large proportion of windfall sites which will be discussed under Matter 4 – Housing Supply.

Moreover restrictions in the dispersed rural area may mean housing needs are not met in this location. It is important that the Plan's proposed housing distribution recognises the difficulties facing rural communities including lack of housing supply and unaffordability. The NPPG emphasises that all settlements can play a role in delivering sustainable development in rural areas so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. One of the core planning principles of the NPPF (para 17) is to *"take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it"*. This principle is re-emphasised in para 55 which states *"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain*

*the vitality of rural communities*". It is suggested that the most appropriate balance between the coastal fringe and the rural area may not have been achieved by the proposed spatial strategy.

**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 policies contained within the submitted Plan are insufficiently flexible to allow for starter homes, self-build and custom house building. For example Policy SC1 is too restrictive to accommodate starter homes, self-build and custom house building therefore amendments including the re-definition of affordable housing are needed.

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

No comment.

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