

WEST SOMERSET LOCAL PLAN EXAMINATION

INSPECTOR'S MATTERS AND ISSUES

Matter 4: Housing supply

- 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?**

Whilst the HBF supports the Council's decision to allocate additional sites for 245 more dwellings the balance between the strategic sites, early release sites and windfalls is not robust.

There still remains too much uncertainty associated with expecting 1,200 dwellings to come forward from windfalls. There is a risk that Policy SC1 which limits and phases development in the named primary and secondary villages will inhibit the number of windfalls coming forward in these locations. It is not obvious if this has been taken into account in the Council's calculations. There also remains some confusion over whether or not the Council is proposing more site allocations via a Site Allocations Plan (EB8 Point 4) for mid-range sites 10 – 100 dwellings. If so it is noted that this Plan is sometime away (paragraph 5.17 EB15) and not referred to the latest Local Development Scheme (EB18).

Overall the Council's approach is akin to an unplanned Plan which is not compatible with the NPPF (para 47) whereby key sites which are critical to the delivery of the housing strategy over the plan period should be allocated.

By way of correction the Council should :-

- allocate more sites in this Plan rather than any future SAP ;
- bring forward reserve sites in Policy LT1 ;
- remove phasing restrictions and consider increasing the proportion of development proposed in primary and secondary villages.

When allocating more sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time

period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

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 presentation of the housing trajectory is correct and appropriate. It serves to highlight the reality of the Council's untenable position of not having a land supply which is sufficient to meet its proposed housing requirement.

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

The Council has calculated its 5 YHLS position as 5.1 years. The HBF disagree with the Council's method of calculation. It is HBF's opinion that the Sedgefield approach to shortfalls should be applied and the buffer should be applied to both the annualised housing requirement and the shortfall. These adjustments worsen the Council's position below 5 years demonstrating the precariousness of the Council's 5 YHLS. As the margin for error is so minimal it is critical that the Council's assumptions on lapse rates, lead in times and delivery rates contained within its calculations are correct and realistic as there is currently no contingency and so no flexibility. In assessing the Council's assumptions the HBF would not wish to comment on the merits or otherwise of individual sites contained within the Council's housing trajectory which will be further discussed under Matter 5. However if the Local Plan is to be sound there must be a reasonable certainty that the Council has a 5 YHLS on adoption of the Plan and beyond because without a 5 YHLS the Plan would be rendered unsound by its ineffectiveness and inconsistency with national policy.

**Susan E Green MRTPI
Planning Manager – Local Plans**