



West Somerset Local Plan to 2032

Matter 4: Housing supply

February 2016

This document represents West Somerset Council's response to the Inspector's Matter 4. It should be read alongside the Council's submissions in respect to other Matters and also presented to the Examination. West Somerset Council responses to the Inspector's Matters 1 – 8 can be found at the Examination Latest News webpage: <http://www.westsomersetonline.gov.uk/Planning---Building/Planning-Policy/Local-Plan-to-2032/Latest-Examination-news>

The paragraph numbering used in this response relates to the matters identified by the Inspector and his issues identified against each matter.

Matter 4.1: The contribution of strategic sites, early release sites and windfalls

- 4.1.1 The Council prepared a housing trajectory (**EB17**) to support the response to the Inspector's Initial Questions. This trajectory was based upon a number of different assumptions relating to the anticipated build out rates associated with strategic sites, early release sites and windfalls (as well as sites which already benefit from planning permission).
- 4.1.2 In the case of the strategic sites shown in the trajectory, these sites are those proposed for allocation within the Submitted Local Plan to 2032. The assumptions made around the anticipated build out rates are intentionally conservative. This has meant that the maximum build out rate attributed to strategic sites in Minehead, Watchet and Williton is 35 dwellings per annum and 20 dwellings per annum respectively. Moreover, the Council has not anticipated any completions on its strategic sites until 2016/17.
- 4.1.3 It should be noted that planning permission and permission subject to Section 106 has been granted on two land parcels comprising part of the Minehead MD2 allocation. Contributions from these two parcels have not been counted until 2017/18 in the case of land at Hopcott Road and 2018/19 on land west of the Caravan Club. Subject to market interest it is possible that these sites could be delivered earlier within the Plan period and in the case of land west of the Caravan Club, earlier delivery than currently anticipated would increase the contribution made by this site to the five year deliverable supply of housing land.
- 4.1.4 Early release sites were included in the Housing Trajectory published in September 2015. Since this date, the Council has resolved to formally endorse six of the nine sites originally identified in the Trajectory. As such it has prepared a minor addendum to the Housing Trajectory which has been appended at Appendix 4a to this Response.
- 4.1.5 The Trajectory as set out now rolls forward the contributions which can be drawn from the early release sites into the five year deliverable supply period. It also removes the contribution previously shown beyond the five year period at sites CAR6, WAS4 and WAS5 since these sites were not endorsed by the Council at the meeting of 16 December 2015.

- 4.1.6 Windfalls have historically made a substantial contribution to the rate of new housing development in West Somerset. Over the period 2002/3 to 2011/12 there were more than 900 dwellings delivered on such sites with approximately 40 dwellings per annum coming forward on sites of less than 10 units and 50 per annum on large sites (**ED7** para 81 & 83).
- 4.1.7 The Council considers that the historically high rate of windfall development is likely to continue and that as such an allowance for windfalls should continue to be made within its housing trajectory going forward. Whilst The Framework explicitly points to an allowance not including residential gardens, the Council does not feel it appropriate to make such an exclusion given the nature of the local housing market. Further, where development has occurred in gardens it has generally been only one or two additional homes delivered as a result.
- 4.1.8 The Housing Trajectory makes an allowance of 40 additional units to be provided for small sites beyond the five year period (within which the allowance for small sites reflects existing planning consents). This allowance is in-line with the long-term average of small sites windfall completions.
- 4.1.9 In the case of larger sites, the Council recognises that the high historic average of 50 dwellings per annum is unlikely to continue indefinitely. It is felt however, that there will continue to be some large scale windfall sites coming forward in the Planning Area. The Authority's previous track record in bringing forward such sites and the time between the Local Plan's anticipated adoption and the formulation of any comprehensive Plan Review or Site Allocations Plan suggest that an on-going allowance of 25 dwellings per annum drawn from large sites is reasonable.
- 4.1.10 The balance between strategic sites, early release sites and windfalls is identified by the Council's Housing Trajectory is:
- Plan Target to 2032 = 2,900
 - Completions to date = 306
 - Residual Requirement = 2,594
 - Strategic sites contribution¹ = 1,595 (61.5% of residual requirement)
 - Early release sites contribution = 245 (9.4% of residual requirement)
 - Windfalls = 895 (34.5% of residual requirement)
- 4.1.11 The information outlined above amply demonstrates that the bulk of the remaining housing requirement can be delivered through the strategic sites and early release sites. These two sources of supply can provide for around 1,840 of the residual requirement of 2,594 new dwellings this would leave 754 to be found from windfall development. It should be noted that in order to deliver c.750 new dwellings on windfall sites over the remaining years of the Plan period would require a long-term average of less than 45 dwellings per annum: less than half the average over the period 2002/3 – 2011/12.

¹ (inc strategic site parcels with pp / LT site contribution of 150 dwellings)

Matter 4.2: Housing trajectory

- 4.2.1 The Housing Trajectory as originally presented did not indicate that the annual requirement would be achieved until 2018/19. It should be noted that as a result of changes to the Housing Trajectory as appended to this Response (Appendix 4a), the annualised requirement can now be met in 2016/17 and 2017/18.
- 4.2.2 The trajectory is only ever intended to represent the most accurate representation of likely delivery associated with housing sites. To this end it is emphasised that even against the earlier iteration of the Housing Trajectory, under-delivery was only anticipated to be seven dwellings in the years 2016/17 and 2017/18 under the Plan target of 145 dwellings per annum.

Matter 4.3: Implications for the five year supply

- 4.3.1 The Council's Strategy and Housing Topic Paper (**EB7**) set out the position in respect of calculating both the requirements and housing land supply in West Somerset. This paper set out a five year housing land requirement of 800 plots and a five year deliverable supply of 815 plots, the equivalent of 5.1 years.
- 4.3.2 Following the Full Council endorsement of six additional early release sites, the Council has updated its Housing Trajectory (**EB17**) to reflect that contributions are likely to be drawn from these sites within the next five years.
- 4.3.3 The Council has made realistic estimates as to how quickly each of the early release sites could come forward. This takes into account proximity to other adjoining early release sites (in some cases) and that delivery is unlikely on any of the sites before 2016/17. The build out rates anticipated are consistent with those set out in the Council's Strategic Housing and Land Availability Assessment (SHLAA) (**EB5**).
- 4.3.4 The calculation of supply is the same as that set out in paragraph 86 of the Strategy and Housing Topic Paper save for the fact that the contribution drawn from: *Other deliverable sites that offer development opportunities* has been increased from 300 dwellings to **480** dwellings.
- 4.3.5 The five year deliverable supply of housing land should therefore be considered as:
- 200 (large sites with PP) + 115 (small sites with PP) + 200 (windfalls) + 480 (other deliverable sites) = 995 plots
 - $995 / 800$ (five year supply requirement) $\times 5 = 6.2$ years
- 4.3.6 Adding an appropriate allowance for the early release sites clearly makes a substantial positive contribution towards the five year deliverable supply of housing land. The table below illustrates the positive impact making such an

allowance would have on land supply even were the Council's favoured, and demonstrably most appropriate approach to shortfall and buffers not be followed.

Table 4.1:

	5yr supply without early release 815 dwellings	5yr supply with early release 995 dwellings
5yr requirement (5% buffer, shortfall spread) 800 dwellings	5.1 years	6.2 years
5yr requirement (5% buffer, shortfall rolled) 900 dwellings	4.5 years	5.5 years
5yr requirement (20% buffer, shortfall spread) 909 dwellings	4.5 years	5.5 years
5yr requirement (20% buffer, shortfall rolled) 1009 dwellings	4.0 years	4.9 years