



# West Somerset Local Plan to 2032

## Matter 5: Deliverability of Sites

February 2016

This document represents West Somerset Council's response to the Inspector's Matter 5. 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 5.1: Deliverability in first five years and viability**

5.1.1 The selection of the 'strategic sites' included in the Local Plan to 2032 evolved out of the 'strategic directions of growth' that were originally proposed for the (then) Core Strategy as far as the Preferred Strategy stage (**CD15**). As part of the original Strategic Housing Land Availability Assessment (SHLAA), the study looked at broad areas for potential strategic-level development around five settlements. These were;

- land to the north-west, north-east and south-east of Dunster Marsh due to its proximity to Minehead and accessibility to the latter via the A.39,
- land adjoining Minehead/Alcombe to the west, south, and south-east
- land around Stogursey, due to the prospect of a long-term major construction project to build a new nuclear power facility at nearby, Hinkley Point,
- land to the south-west and south-east of Watchet, and,
- land to the west and north of Williton.

The study concluded that there were varying opportunities at each of these locations but also noted that some of the locations suggested were subject to varying degrees of constraint which could limit or even prevent their development (**EB24** Section 11 pp. 29 – 30). In addition to the broad areas search a number of large sites were nominated through the 'call-for-sites' that were outside of these areas.

5.1.2 The findings of the original SHLAA study which was completed in March 2010 and the conclusion of the Options stage of the emerging local plan helped to refine the potential land being considered for strategic levels of development. The revised list of locations incorporated as part the Preferred Strategy included;

- land to the north-west and, north-east of Dunster Marsh,
  - land adjoining Minehead/Alcombe to the west, south-west and, south-east
  - land to the south-west and south-east of Watchet, and,
  - land to the west, north and, east of Williton.
- (**CD15**)

5.1.3 The publication of the NPPF during the consultation period of the Preferred Strategy, and the implications of its contents meant that the original approach

to strategic development, of general directions of growth, was no longer valid. Land would need to be allocated and, capacities identified for each, if the Local Plan to 2032 was to be NPPF compliant. A combination of; the removal of the Regional Spatial Strategy for the South West (May 2013), a revised assessment of future housing need in the LPA area and, the need to quantify the potential impact of the proposed development at Hinkley Point on the housing market, helped to inform the choice of strategic sites included in the Revised Preferred Strategy (**CD30**). The updating of the original SHLAA information including an assessment of all the relevant sites in both SHLAA studies in terms of their accessibility to services and facilities helped to clarify whether the strategic sites were consistent with sustainability criteria. Other factors such as vulnerability to flooding from fluvial and tidal sources, proximity to heritage and/or environmental assets were also taken into account to help build a more detailed appreciation of the individual sites nominated as well as a more general appreciation of the surrounding area.

- 5.1.4 As mentioned in the Statement to Matter 3, the selection process took place over a number of years and was adjusted to reflect changed circumstances. The number of locations and sites, even at the outset, was restricted due to the limited number of alternatives available that could be deemed to be as sustainable. Also, this had to be set in the context of a history of consistent but low-level (compared to the larger neighbouring LPA's) rate of delivery and a modest but significantly enhanced housing requirement figure.
- 5.1.5 The SHLAA Panel meeting in the summer of 2015 gave a view of the potential of individual sites in terms of their suitability and deliverability from the commercial perspective. These, in general, confirmed the expectations that had informed the sites in the original study as well as the newly nominated locations. Although not many sites had come forward in the intervening period due to the recession and slow recovery, this did not alter the Panel's expectations on the deliverability of the sites they deemed suitable for future development. This was reflected in the final SHLAA Update report (**EB5** Appendix 4). Whilst the update to the viability study raised concerns in respect of the deliverability of the desired quantum of affordable housing sought on some of the larger strategic sites, it did not suggest that this made them undeliverable (**EB4** p.47).
- 5.1.6 It is expected that due to the relatively low levels of delivery from large sites in the past, that the strategic sites, in some instances, may need the full length of the plan period in order to be fully built out. However, their proximity to existing services and facilities is still considered as important asset influencing their delivery. The house-building and housing market generally, even in the most active part of the LPA, the 'coastal strip' has been slow to recover from the effects of the recession. The original SHLAA noted that, even in periods of confidence and optimism, as existed in the middle of the first decade of the millennium, the rate of delivery that could be expected from the larger sites being developed was quite modest.

5.1.7 In terms of the additional sites that have been recommended for consideration, these are primarily aimed at ensuring that a range of sites are available for development in the early stages of the plan, post-adoption. The sites put forward are ones that received favourable endorsement from both the SHLAA Panels in terms of their suitability and availability (**EB5** Table 5c pp. 35 – 39 and, Appendix 4). The expectations of the Panel members were that, given these attributes they could be expected to come forward quite quickly. They were also deemed by the LPA to be some of the more accessible to services and facilities and provide the better opportunities for promoting more sustainable patterns of activity by the residents once they were completed. The SHLAA Update report also took account extant planning permissions on sites for more than 5 dwellings and, extant employment locations that could be considered for residential development/re-development. These were all assessed using the three primary SHLAA criteria of suitability, availability and, achievability/deliverability (**EB5** Tables 5a and 5b pp. 33 – 34).

#### **Matter 5.2: Deliverability beyond the first five years and viability**

5.2.1 The LPA accepts that strategic sites will probably take most of plan period to be built-out due to nature of local housing market and high level of sensitivity to changes in local economic conditions. The 'Additional Sites' that have been identified in order to address a shortfall in providing a range of sites are expected to come forward in the first five year period. However, it is acknowledged that, due to the size and potential capacity of the land identified through this means at Liddymore Farm, the build-out of this site, post approval may extend beyond the first five years. The SHLAA Update report gives an indication of when qualifying sites considered suitable for development, could come forward but, ultimately, the real determinant will be the willingness of land-owners to offer up the sites and other factors in the operation of housing market (**EB5** Table 5c pp. 35 – 39). The Housing Trajectory also provides a notional indication of when the sites could be delivered (**EB17** and update to it)

#### **Matter 5.3: Infrastructure requirements impact on delivery**

5.3.1 West Somerset Council as part of its responsibilities in producing the, Local Plan to 2032 has sought to compile an Infrastructure Delivery Plan (IDP) (**CD9**). This has been done in order to determine whether the quantum of development proposed over the plan-period is likely to require the up-grading of existing or, provision of new, infrastructure at the strategic level, in order to service it. The infrastructure providers have been consulted at each stage during the informal (Issues, Options, Preferred Strategy and, Revised Preferred Strategy) and, formal (Publication) stages, in the production of the local plan to date. Each successive consultation stage has provided addition detail about the plan and, at the Revised Preferred Strategy stage gave a clear

indication of where part of the overall development was likely to be located in respect of the strategic sites.

- 5.3.2 The limited response to the consultations prior to the Publication stage suggests that the proposed quantum and location of development (both, strategic sites and general strategy approach) is unlikely to cross any thresholds that would generate the need for enhanced or new strategic level infrastructure. The LPA appreciates that the proposed strategic sites themselves are likely to generate new infrastructure requirements within themselves and to integrate them with the settlements which they adjoin. The extent of this is expected to be identified through the master-planning that it is proposed should form an integral part of the bringing-forward of these sites for development (**SD1** Policy MD2 pp. 35 – 36, Policy WA2 pp.39 – 40, Policy WI2 pp. 43 – 44 and Policy LT1 pp. 45 – 46).

### ***Impact of Hinkley Point C development proposal on infrastructure***

- 5.3.3 As part of the application for a Development Consent Order in relation to the proposal to construct a new nuclear power facility at Hinkley Point, the applicants were required to assess the strategic impact of the construction project on the surrounding area and make provision for mitigating its impact. It was considered that the only significant infrastructure improvement/upgrade required in West Somerset LPA area, to service the impact of the additional workforce required to build the facility, was the provision of a new roundabout at Washford Cross to service one of the nearby proposed 'Park & Ride' sites that will be provided for workers at the site. This was constructed during 2015 and completed in December of that year.

### ***Community Infrastructure Levy***

- 5.3.4 West Somerset Council has investigated the potential to propose a Community Infrastructure Levy (CIL). This is expected to help fund local-strategic infrastructure improvements and provision arising from development within the LPA area in the future. The current position as indicated by the existing IDP would suggest that there is little evidence to support the establishment of a CIL tariff in West Somerset. The Council has commissioned a detailed update to the IDP in order to establish if there are items that could be funded through this approach. This is as a result of the limitations that have recently been introduced in relation to the use of funding provided via Section 106 Agreements attached to planning applications. This is due to be completed shortly.