

MATTER 3: INSPECTOR'S NOTE

1. We will have discussed under Matter 2 the way that the HMA has been defined, what the OAHN for that HMA should be and what level of housing requirement the plan should be providing for. Under Matter 3 we will discuss how the strategy that the Council has selected to deliver the number and type of dwellings required emerged and how the policies proposed would implement that strategy. As with Matter 2, this note sets out my current understanding to assist the discussion. It is important that my understanding is corrected at the hearing session if it is wrong in whole or in part.
2. In the Strategy and Housing Topic Paper (EB7) the Council says that its biggest concern is not so much the OAHN number but its composition with the need for 'social housing' amounting to some 60% of the total need (paragraph 50). In using that term the Council appears to be referring to affordable housing as now defined in Annex 2 of the National Planning Policy Framework. However, others have referred to the issue of 'affordability' in arguing that an increase in housing supply would help to address the issue of a significant mismatch between typical incomes in the area and the price of market housing. Indeed, in ED34/3, paragraph 3.3.1 this is also how the Council characterises what it says is the 'biggest issue' for the Council as both LPA and LHA. I do not believe the two terms are necessarily interchangeable and it is important that it is made clear during the discussion which housing type is being referred to at any point.
3. A need (the OAHN) of 2,105 dwellings would suggest that some 1,260 dwellings should be provided as affordable homes.
4. It appears to me that the plan strategy was determined in 2010. It would seem from CD24 that 6 strategy options were subject to sustainability appraisal with the 3 that were not taken forward in the earlier consultation as being among those recommended being subject to a similar level of scrutiny. Strategy Option 1 was taken forward as the basis for the plan. However, it is not clear that this option performed any better in sustainability terms than any other. It appears from EB7, paragraph 35 to have been chosen on the basis of public support. The Council will need to be clear about this.
5. At paragraph 3.1.6 of ED34/3 the Council confirms that it is policy SC1 that reflects the strategy. Most of the planned housing (1,700 to 1,840 dwellings) will come forward in the 3 main centres on the strategic sites allocated. About 35% would be affordable housing under policy SC4 (subject to discussion on the implications of current court proceedings).

That would provide some 650 dwellings at most-or about 51% of those needed.

6. On the face of it therefore the strategy chosen would appear bound not to deliver what is required to fully address what is identified as the most significant housing issue facing the Council.
7. We will discuss whether the assumed contribution to be made from windfall sites is robust in more detail under Matter 4. However, it is also material to a discussion about the plan strategy as I need to be clear how and where these windfall sites will come forward.
8. Taking the Framework definition of 'windfall' the assumption is that these sites will deliver about 1,200 dwellings over the plan period or 60 per annum. If I have understood correctly how policy SC1 will work in practice, some 325 (c16 pa) would come forward in the primary and secondary villages. Does that mean the other 875, or 43-44 pa, will come from the 3 main towns? Paragraphs 81 to 84 of EB7 would suggest that the vast majority of these will be on what, in the context of West Somerset, are sites of significance (over 10 dwellings).
9. First, this would appear to be inconsistent with the assumption carried forward in paragraph 83 of EB7. Second, that same paragraph reveals that most of the dwellings provided on large sites have come forward outside the development plan allocations. Have the reasons for that been explored and how should this influence the strategy for this plan?