



Programme Officer
West Somerset Local Plan
West Somerset House
Killick Way
Williton
Somerset
TA4 4QA

SENT BY E-MAIL AND POST

15th July 2016

Dear Sir / Madam

WEST SOMERSET LOCAL PLAN MAIN MODIFICATIONS CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Main Modifications

MM2 amends **Policy SC1 – Hierarchy of Settlements** to delete the open countryside bullet point so that development elsewhere in the open countryside will be considered under **Policy OC1**. It is agreed that this modification provides greater clarification.

MM3 amends the definition of "limited development" in primary villages and "small scale development" in secondary villages. This modification removes the reference to maximum numbers but retains the limitation on the amount of development in any 5 year period. There is also an amendment to the specified number of dwellings in each settlement at the start of the plan period. Unfortunately despite these modifications the policy remains confused lacking sufficient clarity to be effective. There is a disparity between the 10% growth in the villages equal to 10 dwellings per annum and the 30 dwellings per annum included in the HLS.

Other than an upward adjustment for the 10 years rather than the 5 years migration trend there are no further adjustments to objectively assessed housing needs (OAHN) for lack of affordability in the housing market and significant affordable housing needs irrespective of the Council's own evidence which demonstrates further upward increases are justifiable. **MM4** introduces in the supporting text of **Policy SC2 – Housing Provision** a specific reference to an uplift in the housing requirement of 450 dwellings above OAHN because of additional consequential housing needs from the proposed Hinckley Point power station development.

MM4 also introduces a stepped trajectory of 122 dwellings per annum for 2012/13 – 2017/18 and 155 dwellings per annum for 2018/19 – 2031/32 against which West Somerset's 5 years housing land supply (YHLS) will be calculated. Without this modification the Council would be unable to demonstrate a 5 YHLS on adoption of the Local Plan thereby failing to be positively prepared, effective and consistent with national policy. Whilst this main modification enables the Council to meet its 5 YHLS in the short term and postpone the previously proposed allocation of further sites, beyond 2017/18 it remains to be established if the Council will be able to maintain a rolling 5 YHLS.

MM5 introduces a Table of house types by number of bedrooms and tenure mix into the supporting text of **Policy SC3 – Appropriate Mix of House Types & Tenures** against which proposed development should demonstrate its contribution to meeting. However not all sites will be able to accommodate the prescribed housing mix for a variety of reasons including physical constraints associated with site size / location and the impacts of housing mix on viability. Therefore this proposed modification should refer to not only up to date localised housing assessments but also these other equally important considerations. A flexible policy context ensures that housing delivery will not be impeded where housing mix impacts on viability.

In **MM5** there is also a reference to 351 units of specialist accommodation for elderly households as part of the future housing requirement. If this reference is to be included further clarification is required from the Council on its precise meaning. It is noted that Table 7.2 of the West Somerset SHMA updated Final Report of November 2013 by Housing Vision refers to specialist accommodation of 164 designated (definition unknown), 78 sheltered and 109 extra care.

It is disappointing that main modifications to **Policy SC4 – Affordable Housing** are not included. Bullet Points 3A, 3B and 3C are out of date and no longer reflect the latest national policies on housing standards. These bullet points should be deleted.

Conclusions

For the West Somerset Local Plan to be found sound it should satisfy the four tests of soundness defined by Paragraph 182 of the NPPF. The West Somerset Local Plan is considered unsound because it is not positively prepared, justified, effective and compliant with national policy in respect of :-

- the calculation of OAHN and the proposed housing requirement ;
- the proposed housing mix and affordable housing policies ;
- the overall HLS and maintaining a rolling 5 YHLS throughout the plan period.

It is hoped that these comments are helpful to the Inspector and the Council in informing the next stages of the West Somerset Local Plan. In the meantime if any further assistance or information is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans