

Dear Mr. McDonagh,

Apologies for the delay in responding to your e-mail. Thank you for making the effort to attend some of the 'hearing-sessions'. It is always heartening to see people turn up for these occasions as they are entitled Examination-in-Public. I have participated at a number over the years and for many of them the attendance by members of the public has usually been a rare occurrence. I am not surprised that you found yourself confused over the expressions being used (e.g. SHLAA, SHMA, NPPF, etc.). Like most professions, the world of planning has led to the development and use of a language (and vocabulary) all its own, understandable only to a small portion of the population who regularly participate in or, come into contact with the planning system. The sessions you heard were probably the 'worst offenders' in respect of the use of those phrases and acronyms that are unique to planning. Although the timetable of hearing sessions appeared to be divided into eight separate and distinct areas, many of these were interlinked with others as no doubt became apparent when participants referred to items to be discussed at later sessions. Matters, 2, 3, 4, 5 and, 6 particularly so.

**Matter 2** – this was supposed to be about SHMA's or, Strategic Housing Market Assessments. These are studies that seek to identify the make-up of the population as it is now and how it might change in the future. They generally cover a period of about 20 years into the future. Using the information available from sources like the Census, they are used to identify how the population will look at the end of the plan-period and use this to calculate what and, how much new housing is likely to be required over the period covered by the Local Plan. The key figure that comes out of these studies is known as the 'housing requirement'. This is the figure that each Local Planning Authority (LPA) is expected to provide for in whole or in part through its Local Plan. This is usually done through the process of identifying allocating land for residential development through the Local Plan. In the case of West Somerset (outside of the Exmoor National Park) the objectively assessed housing need (OAHN) figure, for the period 2011 – 2031, that the LPA's plan was expected to provide for, of 2,398 (from the 2013 West Somerset SHMA Update). Added to this was an allowance for the extra housing that is anticipated will be needed as a result of the construction of Hinkley Point C. This made the total housing requirement figure that the Local Plan was attempting to provide for of 2,900 new dwellings over the plan-period. The development industry will usually argue that the LPA housing requirement figure being planned for is too low. In West Somerset there is limited demand for new housing. In other areas where the housing market is more active, such as Taunton Deane, the development industry may argue through the local plan process that this figure is too low and should be higher. This does not happen in West Somerset and the only participant at the hearing session on Matter 2 asking for this was the Home Builders Federation (HBF). This organisation represents the larger house-builders such as Barratts, Taylor Wimpey, Persimmon, etc., none of whom are currently active in the West Somerset area. However, as the Inspector pointed out during the sessions, no organisation/developer had suggested an alternative housing requirement figure for the West Somerset LPA area and/or provided any justification/evidence for it.

**Matter 3** – this dealt with the overall strategy by which the location of future development was to be determined and, as part of this how provision for the delivery of future affordable housing would be made through this. The strategy that West Somerset Council in its role as the LPA for those bits of the District outside of the Exmoor National Park, is to direct the majority of all types of future development, towards the three largest settlements of Minehead, Watchet and, Williton. In order to cater for this the Local Plan to 2032 identifies a number of strategic sites around the main settlements. These are sites which (in most instances) are expected to provide for a minimum of 250 dwellings and at least 3 Hectares of land for employment-generating and community related activities and, have been identified around the three main settlements. The identification of these sites has been informed by a couple of studies called Strategic Housing Land Availability Assessments or, SHLAA's. These were produced in response to the West Somerset LPA issuing a 'Call-for-Sites' whereby people were asked to nominate pieces of land that might be suitable for development for housing. One of the requirements for nomination was that the land-owner was willing to make the

land available for this purpose. The SHLAA process helped to identify the land available that comprised most of the strategic sites allocated through the Local Plan. It also generated a number of alternative potential locations for development of varying size and some of these were being promoted by owners or their consultants through the examination hearing sessions. All sites covered through the two SHLAA ‘Call-for-Sites’ were assessed by an independent ‘panel’ comprising experts from local and national organisations associated with the housing market (e.g. developers, land-owners, estate-agents, housing associations, etc.). They assessed each site on three basic criteria which comprised;

- Suitability
- Availability – how soon could the site be brought forward for development?, and,
- Deliverability/Achievability – what would be a realistic amount of dwellings that could be provided from the individual site?

Other information in respect of the accessibility of individual sites to existing nearby services and facilities, was provided for the Panel that was involved in the SHLAA Update report that was published in July 2015 (the information was also retrospectively applied to those sites considered in the original SHLAA and the Panel were given the opportunity to re-assess the verdict of the original SHLAA Panel on these in the light of this additional data. They did not choose to change any of the original verdicts). The main focus of the discussion was how the sites had been selected and the way the Sustainability Appraisal had been applied to the SHLAA sites that were considered as suitable for development.

In respect of the discussions on Matter 3, the HBF continued its argument that the LPA was not providing enough land for housing development during the plan-period (2012 – 2032), whilst the developers and their consultants were primarily arguing for their pieces of land to be included and allocated through the Local Plan. The issue of affordable housing was not actively disputed by the development industry through these discussions. All seemed to accept that their sites would have to make provision for this should their individual sites be included. The Inspector sought to ascertain what other routes the LPA had explored in order to facilitate the delivery of affordable housing during the plan-period given the high proportion of future need for this type of housing that had been identified through the SHMA studies referred to in the Matter 2 discussions. A critical point in this discussion was the fact that the LPA could not expect potential development sites to provide the amount of affordable housing suggested as needed through the SHMA studies as it would make individual sites undeliverable because of viability issues.

The hearing sessions dealing with the deliverability of the ‘strategic sites’ and, proposed ‘early-release sites’ (Matter 5), housing supply – the Council’s estimation as to the sources of future delivery of housing through allocated sites, windfall development, etc., Matter 4) and, ‘other’ potential sites that various participants felt could/would/should be included as part of the process (Matter 6), were all essentially about the ability of the individual sites to help deliver the levels of housing required during the plan-period. These were all linked with, and referred back, to the discussions you heard around Matters 2 and 3. From an LPA perspective, one of the surprising elements of these discussions was the absence of any of the developers/land-owners arguing that their site was better and should be included at the expense of any of the rivals.

The next stages in the Local Plan process are that the Council will be taking a series of proposed modifications to the plan that arose from the hearing sessions, to Full Council on 11<sup>th</sup> May to get their endorsement to go out to consultation on the changes. At this stage it would appear that the ‘modifications’ will comprise mainly of changes/additions/deletions to the Policies in the Local Plan and/or the supporting text. The consultation period will last for six weeks and will probably take place during June and July. As some-one who has made representations on the Local Plan at an earlier stage you will automatically be informed of when the consultation will take place. At the end

of the consultation period the Inspector will consider the responses made to the proposed changes and then incorporate them into his Report on the whole of the Local Plan which will be sent to the Council, probably towards the end of the summer. At this stage in the process, it would be inappropriate to attempt to guess what the Inspector's Final Report will contain and what it will mean for the Local Plan. It is hoped that the Inspector will find the Local Plan to 2032, 'sound' and recommend it for adoption.

I apologise for the length of this message but, hopefully it explains the current situation and answers, at least in part, some of the questions you have raised. If you require any further information on this or related planning policy matters, I can best be contacted via the return e-mail address function.

Regards,

Martin Wilsher

Principal Planning Officer – Policy.