

## INITIAL ISSUES OF CONCERN TO THE INSPECTOR

5 February 2013

1. At this early stage in the examination of the South Somerset Local Plan the Inspector wishes to raise three fundamental concerns with the District Council, which may lead to the need for an Exploratory Meeting. It should be emphasised that at this stage he has drawn no conclusions regarding the soundness of the plan.

### Housing Needs

2. The National Planning Policy Framework (NPPF), in paragraph 156 advises that local plans should include strategic policies to deliver 'the homes and jobs needed in the area'. Paragraph 159 advises that the District's full housing needs should be identified and reference is made to meeting household and population projections. Every effort should be made objectively to identify and then meet the housing, business and other development needs of the area (para 17) and paragraph 47 confirms that local plans should meet the full objectively assessed needs for market and affordable housing, subject to meeting other NPPF policies.

3. To be found sound the Local Plan must have been positively prepared i.e. based on a strategy which seeks to meet objectively assessed development requirements (including housing).

4. The Strategic Housing Market Assessment (2009) concludes that there is an expected household increase of 19,000 in South Somerset between 2008 and 2028 (950 a year). The 'Housing Requirement for South Somerset and Yeovil' (CD 30) concludes that between 2006 and 2026 16,000 new homes would be required based on past trends (i.e. 17,600 up to 2028). The Local plan, however, makes provision for 15,950 dwellings between 2006 and 2028 (725 a year).

5. Up-dated paragraph 4.85 of the local plan sets out four projections, summarised as follows:

Population projection :	15,450 dwellings
Slow economic growth:	13,600 dwellings
Positive economic growth:	17,650 dwellings
Households projection:	17,000 dwellings

(1) Firstly could the Council explain the relationship between the figures referred to in paragraph 4 above and those in up-dated paragraph 4.85 of the local plan;

(2) Secondly could the Council provide the justification for deciding to base the housing figure of 15,950 on the mid-point of the two economic projections, bearing in mind one of the Council's strategic objectives is to achieve a comprehensive high performing economy; and

(3) Thirdly could the Council explain why it has disregarded a figure based on household projections (i.e. 17,000 dwellings), bearing in mind this would have reflected the positive economic growth scenario (i.e. 17,650 dwellings).

### Sustainability Appraisal and Consideration of Options

6. The sustainability Report (CD 16 a-c) refers to the consideration of 11 options for growth at Yeovil which were narrowed down to 6. There is then reference in paragraph 5.5.10 to three additional options – the third one of which was called ‘multi-site’ which incorporated 4 parcels of land. This option has been subject to sustainability appraisal (SA) but it is not clear:

- on what basis those 4 areas of land were ‘selected’; and
- whether or not there are other smaller areas that could have been considered as part of a ‘package’ and if so why they have been discounted.

7. Similarly with the SA for options around the market towns (for example, Ilminster, Ansford/Castle Cary, and Somerton) it is not clear if consideration has been given to the potential for what could be described as a more scattered approach i.e for smaller areas to be identified which may not necessarily reflect just one of the ‘directions of growth’.

### Employment Provision

8. The Council is proposing a minor change to the text of the local plan which would replace the figure of 9,200 jobs to be ‘provided’ in the plan period, by a figure of 11,250 jobs. This represents a 22% increase. However, no commensurate change is proposed to the District housing provision of 15,950 dwellings. It is the Inspector’s initial opinion that not only is the increase in employment provision significant but also that there could be other implications of the change which may need to be addressed.

9. At this stage the Inspector considers that the most appropriate way forward is to highlight this issue in the forthcoming Issues and Questions and to seek responses from interested parties. Depending on the evidence submitted it would then be possible to address the matter at the appropriate Hearing session. Finally if it was published as a Main Modification after the close of the Hearing Sessions, that would provide a further opportunity for people to comment.

10. Before the Inspector makes a decision on the way forward, however, he would welcome comments from the Council on the implications of the change to the jobs figure and also on how it would seek to address this concern in a way that is fair to all.

11. A response to these issues from the Council within two weeks would be appreciated.

*David Hogger*

Inspector