

South Somerset District Council: Local Plan 2006 – 2028

Independent Examination, May 2013

South Somerset District Council Hearing Statement

Issue 8

Crewkerne

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Contents	Page
Question 8.1	3
Question 8.2	9

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Question 8.1

Is the vision for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?

- 1.1 The Council's Settlement Role and Function Study [CD 35, paragraphs 6.20-6.21] identifies Crewkerne as a settlement with a strong employment, retail and community role. It has an existing concentration of business and a good variety of shopping and community services that meet the needs of the settlement and the surrounding area.
- 1.2 The National Planning Policy Framework (NPPF) establishes a presumption in favour of sustainable development which is the golden thread running through the plan-making process. For plan-making this means positively seeking opportunities to meet the development needs of the district, and the Local Plan meeting objectively assessed needs with sufficient flexibility to adapt to rapid change.
- 1.3 The cluster workshops undertaken between November 2009 and March 2010 [CD 131, paragraphs 3.9-3.11] allowed for early and meaningful engagement and collaboration with the local community, as encouraged by paragraph 155 of the NPPF, and was an important consideration in determining the appropriate levels of growth for Crewkerne. The cluster workshops involved the Parish and Town Council, together with a range of stakeholders suggested by the Parish and Town Council. This enabled the identification of the context for and implications of decisions, the local community to develop their vision for the town based on the Sustainable Community Strategy [CD 32] and growth needs, as well as enabling the early involvement of local Councillors in the decision making process.
- 1.4 Policy SS5 of the Proposed Submission South Somerset Local Plan (PSSSLP) as modified [CD 3b, M74] supports the development of 961 dwellings in Crewkerne across the plan period, of which 916 are already committed (including 525 which are part of the saved local Plan allocation that secured planning consent in December 2011, with the Section 106 Agreement having been signed in February 2013) leaving a residual requirement of 45 dwellings without consent. The level of housing growth proposed for Crewkerne has been derived from the Housing Requirement for South Somerset and Yeovil [CD 30] report which developed an overall housing provision requirement for the district. Modifications and updates were subsequently undertaken by the Council including:
 - BRES data (2010 and 2011 data) updated on two occasions (taking the base data for the economic calculation forward to 2011 and replacing the assumption adopted by Bakers to derive a 2010 base date)
 - Two updates to population projections (from which household requirements were derived) to reflect 2010 based Population Projections and ONS Population

Projections to 2021 (and extended to 2028) to reflect early consideration of the 2011 census.

- 1.5 The distribution of the overall housing provision requirement for the district amongst the identified Strategically Significant Town, Primary Market Towns, Local Market Towns and Rural Centres was determined using the following assessment criteria:
- Sustainability of distribution options
 - Balance of jobs with homes
 - Settlement hierarchy
 - Land availability (demonstrated by Strategic Housing Land Availability Assessment); and
 - Local (settlement based) factors including:
 - Economic performance of settlements
 - Size and self-containment
 - Existing saved Local Plan proposals
 - Indicative growth appropriate for settlement types
 - Need to assimilate past growth
 - Environmental/archaeological and flooding constraints
 - Policy aspirations for Rural Settlements
 - Existing commitments; and
 - Market delivery as exemplified by the housing trajectory
- 1.6 Report 8 from Workshop 1 of the Local Development Framework Project Management Board meetings [CD 115] recommended retaining the overall requirement of 1,028 dwellings for Crewkerne. In addition the Settlement Role and Function Study identified that over the plan period there will be a reduction in the household size from 2.36 persons per household to 2.12 persons. Based on the 2001 Census population for Crewkerne (7,500 population), if there were no additional dwellings built in the town, there was no migration and household reduction occurred as projected (i.e. reduced from 2.36 to 2.12) then the town's population would decline by 750 people to 2026 which would negatively impact upon the provision of shops and community facilities.
- 1.7 Report 8 also identified that the South Somerset Local Plan allocated the CLR site as a key site, which as part of the regeneration of the town would deliver a package of land uses to achieve a balanced development for Crewkerne, including a link road between the A30 and A356. This is viewed as strategically significant and is carried forward in the PSSLP through Policy HG1: Strategic Housing Site. It identified that there was some concern that a large proportion of Crewkerne's commitments come from saved Local Plan allocations, suggesting that these will never be realised, however the Maiden Beech site was awarded planning permission in August 2010 and has since seen 88 completions with 26 dwellings recorded as being under construction at March 2012. The Council is currently in the process of updating its housing monitoring database. The CLR site was awarded planning permission in December 2011 and the Section 106 Agreement was signed on the 18th February 2013, demonstrating progress on saved Local Plan allocations.

- 1.8 The figure of 1,028 dwellings was subsequently reduced to 961 dwellings in the PSSSLP as amended [CD 3b, M74] in light of representations made on the PSSSLP and the content contained in Business Requirement Employment Survey information and ONS population projections through discussions in the Local Development Framework Project Management Board meetings 21-23 [CD 117 & CD 118].
- 1.9 The quantum of employment land provision made within Crewkerne has been derived through a three stage Employment Land Review (ELR) process. The first stage identified an overall gross and net supply at April 2010 with the second stage then looking to rationalise the employment land provision provided for in Policy HMA13 of the Proposed Modifications to the Regional Spatial Strategy and apply that rationale to local conditions to create a robust picture of future land requirements. Stage two also identified that the employment land allocations in the Core Strategy would not be sufficient to meet the districts employment land requirements over the plan period and that there was a need/demand for approximately 104 ha of employment land to 2026. The third stage brought together the conclusions of the previous two stages and refined a final requirement of 107.43 ha, taking into account future housing growth and qualitative factors such as geography, type of employment land available and required in each settlement and the views of the Town and Parish Councils.
- 1.10 For Crewkerne a requirement of 10.53 ha was identified in the Stage 3 ELR [CD 50i, page 19] to support self-contained population growth and create a more sustainable settlement. This is anticipated as being provided for through the Crewkerne Key Site.
- 1.11 The employment land requirement seeks to increase Crewkerne's level of employment self-containment and support and maintain the town's role and function within the settlement hierarchy.
- 1.12 The review of the supply identified that between April 2006 and March 2010, 0.06 ha of employment land was completed with approximately 0.02 ha with consent but where construction had yet to start. The main supply was the Saved Local Plan Allocation on the CLR site of 10.53 ha and 0.8 ha North of Cropmead Trading Estate. As progress had not been made on the 0.8 ha site it was not recommended for carrying forward to be saved for employment land and other than the CLR Saved Allocation there is very little supply.
- 1.13 In order to establish the local need and demand for employment land requirements in Crewkerne four main sources were used:
- Household growth over the plan period:
A need for 6 ha employment land was identified based upon 1,028 dwellings across the plan period.
 - Crewkerne Town Council feedback (2010):
Requested that both light and heavy industry were catered for.
 - Property Workspace study (2008):
Identified demand for 1.5 ha over the plan period which is factored up by 4 to give a projection over the 20 year period resulting in 6 ha.
 - Property agents feedback (2009):

Limited notable demand with existing industrial estates appearing to function well, with long established businesses, and there remains land available for future development. The proposed allocations in the key site should meet future demand and do not consider a need for additional land above and beyond this. Overall, an on-going rolling supply of 1 ha should meet local demand. Consensus that Saved Local Plan allocation is sufficient to meet the existing future needs of businesses.

- 1.14 The Council's 2009 Retail Study Update [CD 53, page 100] identified a constant market share for convenience shopping and therefore Crewkerne was not expected to generate quantitative capacity for additional floorspace up to 2026. The study identified no need to plan for an increased market share for the town to generate capacity for additional provision. It identified a loss of comparison uses from the town centre with a qualitative deficiency in provision and therefore considered there was capacity for 110 sqm net additional comparison goods floorspace by 2014, rising to 680 sqm net by 2026 based on constant market share.
- 1.15 This was updated in by the Retail Study Update 2010 [CD 54] which was based upon the draft Core Strategy district-wide population growth and housing development distribution. The report found that there was still no capacity for an increase in convenience retail floorspace, whilst for comparison retail, capacity for 93 sqm net additional floorspace by 2014, rising to 512 net by 2026 was identified.
- 1.16 Further updates to this information were undertaken through the 2012 Retail Floorspace Capacity Study – 2nd Update [CD 51]. This was undertaken firstly because an updated strategy for residential development across the district had been prepared which, together with updated population growth forecasts, had an impact upon the need for additional retail floorspace across the district and secondly because since the previous assessments updated forecasts for retail expenditure growth and spending on online shopping had been released. This report found that Crewkerne still did not have a requirement for any increase in convenience retail floorspace capacity across the plan period. For comparison retail the report identified that there was capacity for 121 sqm net (equivalent to £0.5m retail expenditure) by 2014, rising to 5667 sqm net (equivalent to £2.7m retail expenditure) by 2028.
- 1.17 The PSSSLP reflects the findings of the retail assessments and sets out that Crewkerne is a Market Town in retail terms with recent supermarket developments meaning that there is no additional capacity for substantial increases in convenience goods retail floorspace to 2028. For comparison goods retail floorspace the PSSSLP identifies there is capacity to accommodate a net increase with a qualitative deficiency in provision of comparison retail producing capacity for 120 sqm net floorspace (rounded down from 121 sqm net) by 2014, rising to 570 sqm net (rounded up from 567 sqm net) by 2028. The Council anticipates that this provision will come forward as part of the Development Management process.
- 1.18 Assessments of the environmental, social and economic implications of the scale of growth proposed were undertaken through formal Sustainability Appraisal. For Crewkerne the Sustainability Appraisal [CD 16, paragraph 6.6.1] identifies that there are significant positive effects for housing delivery in carrying forward the strategic

housing site allocation for Crewkerne, including the provision of affordable housing. It also identifies that there will be economic benefits that development will bring to the town, with job creation at construction stage, and provision of 'B' use employment land. The on-site provision of a primary school and recreation land will help improve access to services and promote social inclusion.

- 1.19 The Sustainability Appraisal notes that the site is greenfield so will require strategic landscaping to mitigate this effect and that measures will need to be taken to protect biodiversity e.g. dormice bridge. In terms of the issues identified the PSSSLP makes provision to address these through the Development Management process through the implementation of the following policies
- Policy EQ2: General Development - Proposals will be considered against conserving and enhancing the landscape character of the area.
 - Policy EQ4: Biodiversity – Proposals will be considered against protecting the biodiversity value of land and buildings and minimising fragmentation of habitats.
 - Policy EQ5: Green Infrastructure – Ensures that development provides open spaces and green corridor links between new and existing green spaces.
- 1.20 The Sustainability Appraisal [CD16, paragraph 6.51] demonstrates significant economic benefits as the strategic site provides land to deliver 'B' use jobs and provides opportunities to raise the level of self-containment which may lead to the retention locally of the better educated or more skilled residents.
- 1.21 The Council's Report on Infrastructure Planning [CD 36] distinguishes between infrastructure that is required to cover existing deficiencies, that which is related to new development and that which responds to the areas aspirations. It breaks infrastructure into three distinct groups, physical, social and green infrastructure and takes each area in turn, examining the infrastructure items within each area. The study identified the level of capacity that each of the infrastructure types has to meet current and future needs and identifies that there are no critical infrastructure requirements for Crewkerne. For the purposes of clarity, critical infrastructure is defined as infrastructure that without which development cannot commence.
- 1.22 In Crewkerne there were no 'critical infrastructure issues identified but there was a selection of 'necessary' infrastructure requirements identified, which is defined as infrastructure necessary to support new development, but the precise timing and phasing is less critical and development can commence ahead of its provision. In total twenty-three pieces of necessary infrastructure were identified, the majority of which relate to the provision of open space and/or leisure facilities [CD 36, Appendix 1] which are primarily anticipated to be provided through the Development Management process. Policy SS6 of the PSSSLP makes provision for the Council to secure the provision of (or financial contributions towards) a range of physical, social and green infrastructure which the Council considers necessary to enable development to proceed with this anticipated to be secured through Planning Obligations and/or CIL.

- 1.23 The road provided as part of the development of the CLR could fall into the category of 'critical' infrastructure, however the Council considered that as this formed a crucial element of the planning application for the site it will come forward within the development of the consent.
- 1.24 The findings of the Report on Infrastructure Planning [CD16] were reported to the Local Development Framework Project Management Board at Workshop 11 [CD 116] on the 18th January 2012 and endorsed.
- 1.25 The Council considers that the vision for growth and change in Crewkerne is appropriate and justified. It is commensurate with the towns standing in the settlement hierarchy and the level of growth and change proposed over the plan period is sufficient to maintain the towns function, sustaining and enhancing its role at a level that is appropriate to its size, accessibility, character and physical identity. The local community has helped to shape the level of growth and change proposed through early engagement through the cluster workshops.
- 1.26 The economic, social and environmental impacts of the proposed level of growth and change have been assessed through Sustainability Appraisal with issues identified able to be addressed through the application of polices within the PSSSLP.
- 1.27 The implications of growth upon infrastructure have been considered through the Council's Report on Infrastructure which assessed spare capacity and the likely requirements arising from new development proposed in Crewkerne. There are no critical infrastructure requirements identified for Crewkerne other than the delivery of the road within the CLR which will come forward within the development of the consent. Those items identified as necessary are largely considered to be deliverable through the application of PSSSLP SS6 through the Development Management process. Where this is not considered likely other public bodies have been identified as the funding sources through consultation in developing the report.
- 1.28 The level of employment growth proposed makes allowance for enabling the creation of new employment opportunities within the town, reducing out-commuting and increasing the town's level of self-containment.
- 1.29 The level of retail growth proposed takes account of the recent growth in convenience retailing in the town which given market share negates the need for further convenience floorspace capacity to be provided across the plan period. In terms of comparison retailing capacity has been identified for appropriate levels of growth across the plan period to mitigate the loss of comparison uses and the qualitative deficiency in existing provision.
- 1.30 The direction and scale of growth within Crewkerne has been largely determined by the key site from the 1991-2011 Local Plan having not been implemented and carried over to the PSSSLP. Significant work has been undertaken by the Council to secure a Section 106 Agreement which provides appropriate mitigation for the impacts of development whilst ensuring that the scheme remains both viable and deliverable. Through this process the detailed issues have been resolved in principle with the

Section 106 Agreement having been signed in February 2013. The Council therefore expects the site to come forward as anticipated.

- 1.31 Overall the scale of growth proposed is considered to be appropriate to the scale of the settlement within the settlement hierarchy, the ability to extend the range of services to better meet the needs of the settlement and immediate surrounds, and the ability to meet identified needs.

Question 8.2

Is the reliance on just one key site justified?

- 2.1 The Issues and Options stage of plan preparation identified that issues for the town included:
- Traffic congestion having an adverse impact upon the town centre
 - Limited land available for further growth
 - Need for improved primary school provision
- 2.2 The strategic allocation of the Crewkerne key site is sufficiently large enough to enable the development to contribute towards infrastructure improvements which will help to address the issues identified in the town. Were a range of smaller sites to have been taken forward instead then there would not be the critical mass of development to enable the timely delivery of the required infrastructure nor the sufficient level of developer contributions to be achieved to enable the delivery of such infrastructure. It is also of note that the issues and options stage of plan preparation identified that there is limited land available in the town for future growth, further constraining the ability to consider a range of site options.
- 2.3 The Council considers that the development of the Crewkerne key site is critical to the comprehensive regeneration of the town with the delivery of the Link Road between the A30 to Yeovil and A356 to Dorchester a critical element of helping to enable the regeneration of the town through easing the traffic congestion issues identified. The Section 106 package for the site has been negotiated by Development Management to help aid deliverability of the site whilst making appropriate provision for infrastructure to support the development.
- 2.4 The Council has undertaken a significant degree of work to secure a Section 106 Agreement on the CLR site which not only provides appropriate mitigation for the impacts arising from development, but also ensures that the scheme remains both viable and deliverable. The detailed issues have been resolved in principle with the signing of the Section 106 Agreement in February 2013.
- 2.5 The Sustainability Appraisal [CD 16, paragraph 6.6.1] of the proposed Policy HG1 found that there were significant positive effects for housing delivery in carrying forward this allocation in Crewkerne, including provision of affordable housing, together with economic benefits that development will bring to the town with job creation at construction stage, and provision of 'B' use employment land. The

provision of a new primary school on-site and recreation spaces will improve access to services and promote social inclusion.

- 2.6 The objectively assessed housing need for Crewkerne identifies that it can support the development of 961 dwellings over the plan period. At present 916 of these are already committed, of which over half, 525 dwellings, form part of the Crewkerne key site.
- 2.7 The direction and scale of growth was largely determined by the key site from the 1991-2011 Local Plan having not been implemented and carried over to the PSSSLP. If the plan were to make provision for another large site in the settlement then it is considered that this would exceed the capacity for the market in the town.
- 2.8 The Council considers that the plan does not solely rely upon one key site. Maiden Beech is a medium sized site that has been brought forward as part of the housing requirement for Crewkerne with 88 completions and 26 dwellings under construction recorded during the latest housing monitoring survey in March 2012, which the Council is currently in the process of updating. In addition to which there is a residual requirement of 45 dwellings (when taking into account existing commitments) and there is a historic average of 29.5 completions as windfalls per annum
- 2.9 The Council considers that the utilisation of Crewkerne key site as the significant source of growth and development in the settlement is appropriate and justified. It provides a series of local infrastructure improvements which will be to the benefit of the wider Crewkerne area, whilst forming an important element of the overall regeneration of the town. Furthermore it provides greater security both in terms of delivery of development and infrastructure improvements than a multi-site option. The Council also contends that the plan does not solely rely upon one site as the Maiden Beech site, together with other existing commitments and the residual requirement of 45 dwellings make provision for delivery of the housing requirement for Crewkerne across the plan period.