

HEARING STATEMENT OF GRASS ROOTS PLANNING LTD ON BEHALF OF HOPKINS DEVELOPMENTS LIMITED IN RELATION TO ISSUE 7: WINCANTON HOUSING

21<sup>ST</sup> MAY 2014

Q 7.1: Is the Council's clarification regarding its approach to housing provision at Wincanton based on sound evidence? Is it sufficiently flexible?

- 1.1 Hopkins Developments Ltd continue to have concern that the currently proposed level of growth for Wincanton proposed in the Local Plan and the Proposed Modifications will act as an embargo on development in the town. This would be unreasonable as a decision to do this would not be based on any sound or robust evidence.
- 1.2 The Main Modifications proposed by the Council simply add reference to the delivery of at least 703 dwellings and some additional explanation as to why the level of development in Wincanton is being restricted. Put simply the reason given relates to its '*high level of commitments compared to the overall level of housing requirement considered appropriate for the settlement*' and the need to assimilate existing committed sites into the town. In our view this is not a valid reason to restrict development given that no specific infrastructure or environmental constraints have been identified to suggest that development should be restricted in this draconian way.
- 1.3 At recent planning committee meetings we have attended reference has been made to infrastructure constraints in the town. However there is no tangible evidence of this for the following reasons:
  - The Highways Authority has not identified any significant road infrastructure constraints in the town;
  - The County Education Authority, when replying to recent consultation in respect to planning applications in the town has confirmed that no insurmountable constraints in relation to schools exist to prevent development with capacity existing at the town's secondary school and financial contributions being required to provide additional primary school places in the town;
  - No water or sewerage constraints have been identified by the relevant statutory undertakers in relation to the town;

- Landscape and environmental impacts were not cited as concerns when the council previously proposed housing expansion to the north and west of the town; and
- The new health centre located within the New Barns Farm development has spare capacity and is accepting new patients.

1.4 The requirement to provide 703 dwellings in the town means that given historic consent carried over from the last plan period and recent small permissions this target has already been met. This means that many people will consider that Wincanton's needs have already been addressed and no further housing will be required until 2028. Although we note that the 703 is the minimum requirement many residents, and members of the authority, will object to new development on the basis that it is not needed, this is already happening.

1.5 In direct conflict with such an assertion is the housing need for the district as a whole and specifically Wincanton. The Council's housing department has recently confirmed (see appendix A) that 2906 households are registered for re-housing in South Somerset and 126 of these have registered Wincanton as their first choice of parish. Of these 126 households 64 are current residents in the ward of Wincanton itself.

1.6 Therefore, the current proposals for the town do not provide a mechanism to deliver sufficient affordable housing to meet these identified needs and in light of this the MM's and hence the plan is unsound because it has not been positively prepared to meet the objectively assessed housing needs for affordable housing, nor is it effective or justified in light of the alternative strategy of simply positively planning for new housing growth in Wincanton.

1.7 These concerns relate to affordable housing delivery, we also have concerns regarding the delivery of open market housing. At the current time the council accepts that it does not have a five year land supply as set out in the statements of common ground relating to the following appeals:

- Land at Mitchell Gardens, Chard (PINs reference: APP/R3325/A/12/2176355), it was common ground that the council had around a 3 year supply of housing;
- Land east of Slades Hill, Templecombe, Somerset BA8 0HE (PINs reference: APP/R3325/A/13/2196919) - where the agreed statement of common ground confirmed that no five year land supply existed although the extent of shortfall was contested.

1.8 Following both of these appeals the council's planning policy department has again considered the position with regards to five year land supply and undertook a further assessment of this issue in November 2013. This resulted in a paper on the matter being presented to SSDC's

District Executive Committee on the 5th December 2013. This report confirmed that the review of the housing requirement and the available supply of housing sites shows that the Council still do not have a 5 year housing land supply and that in such circumstances the Council needs to seek to secure appropriate housing sites for housing development.

1.9 In the short term even the approval of a new local plan will not address this deficiency because in order to be deliverable case law points towards the need for planning permission to be in place for it to be counted in the supply. Therefore the council is likely to have to accept applications that are coming forward on unallocated land in suitable locations, some of which are in Wincanton, in order to address their current deficiency.

1.10 Appropriate sites for development include locations in or adjacent to sustainable settlements. In our representations to the Council's Main Modifications we set out why Wincanton is a highly sustainable location for housing growth. In summary the reasons and the evidence that supports this can be summarised as follows:

- Wincanton exhibits a ratio between economically active residents and jobs of 1:1, even if you take recent factory closures into account and assume that no new jobs have been created in recent years which is not the case given the commercial developments provided at Long Close and elsewhere.
- No other market town in the district exhibits such a high ratio, with the next closest being Chard which offers 0.8 jobs per economically active resident.
- Although the percentage of Wincanton residents using either buses or cycling to access work is lower than the average nationally and for SSDC as a whole, the number of residents who walk to work is significantly higher than both the national and SSDC average.
- Although comparable data from the 2011 survey is yet to be released the 2001 census clearly identified that Wincanton had a very high level of residents living and working in the same town (52%) which was only bettered by Chard and Yeovil in SSDC.
- Significant numbers of people commute into the town to work, the opportunity for these employees to live and work in the town would be provided if more housing were to be provided here.

1.11 In conclusion the available evidence in relation to Wincanton points towards it being highly sustainable and where small issues have been identified (i.e. the low usage of buses in the town) further development here would enhance and maintain such services. The town also rates very highly when compared against all of the other market towns and the primary town of Yeovil. We therefore have to question why the council has chosen to restrict growth in Wincanton without any robust evidence to suggest this should be done and allocate significant amounts of

development to other parts of the district, including a proposal to provide at least 2,400 dwellings in rural areas where access to jobs, services, public transport and shopping facilities are severely limited. Such an approach is considered to be unsound because it is not the most appropriate strategy when considered in the context of the available evidence which suggests a more appropriate strategy would be to allocate more land for development at the more sustainable settlements such as Wincanton, and is therefore unjustified.

- 1.12 Finally providing no new housing allocations is inflexible in the extreme as it allows no flexibility to not only deal with existing open market and affordable housing requirements but also to react to rapid change in circumstances such as the improving economic outlook. This is not consistent with national planning policy. Given that no significant infrastructure constraints have been identified in relation to the town if more housing than is actually required is provided, the risks are negligible, all of the newly allocated sites would not be developed. On the other hand if no new sites are provided the risks are severe, house prices will rise leading to affordability worsening which will in turn lead to more families in housing need in a context where even existing households in need are being ignored.

Q7.2: What indicators would the Council use to determine whether or not a review of housing provision in Wincanton was necessary?

- 2.1 Turning to the potential for Wincanton's housing requirements to be reviewed at a later date we contend that is not a sound approach to plan making because there is already clearly identified affordable housing need and latent demand for open market housing in the Town. A plan led approach to dealing with this matter is required now and as the town has been identified as being highly sustainable and has no significant constraints in relation to infrastructure or environmental factors sites should be planned for now to meet these needs and address the deficit in five year land supply that is now a persistent problem in the district.
- 2.2 The council's response to the main modifications consultation identified that they did not accept the representations that outlined that ongoing review was not a credible approach to dealing with housing growth in Wincanton. However, they have provided no substance as to how this review will work and when it will take place. As no detail on what would trigger a review and when, and in particular what triggers the allocation of new housing, we must reassert that such an approach is not credible and is not a forward plan at all. Therefore such an approach is unsound because there is no mechanism proposed to make it effective, even if such an approach was justified in the first place, which it is not because the demand for housing and the need to address the five year land supply deficit exist now and the available evidence clearly identifies this.

## Overall Conclusion

- 3.1 In conclusion the current Local Plan and MM's in respect to the Town of Wincanton do not plan positively to meet the town and wider districts housing needs. No evidence exists that suggests housing growth should be restricted in Wincanton, on the contrary the evidence suggests that new housing should be provided in the town. This approach makes the plan unsound for the reasons we have identified.
- 3.2 The NPPF at para 50 requires that authorities need to plan for a mix of housing to meet future demographic and market trends and the needs of different groups within the community. Notwithstanding the market demand for housing in the town Wincanton's affordable housing need is clear, in addition to this local members and a large number of the community have expressed a need for more bungalows to be built to cater for an aging population. None of these needs of specific groups will be met by the currently proposed strategy and therefore the current version of the Plan is unsound because it is not consistent with national planning policy.
- 3.3 As the press and many government advisors have recently identified the continuing house price inflation and connected affordability crisis will not be remedied by restricting housing to a level close to nil. By planning for the provision of suitable sites in all sustainable locations, which includes Wincanton, flexibility is provided to address these issues which would make the plan sound.



**APPENDIX A – EMAIL FROM THE COUNCIL’S HOUSING DEPARTMENT DATED 21<sup>ST</sup> MAY 2014**

**From:** Louise Field [mailto:Louise.Field@SouthSomerset.Gov.Uk]  
**Sent:** 21 May 2014 13:50  
**To:** Matthew Kendrick  
**Subject:** Wincanton Housing Need

Dear Matthew

Further to our telephone conversation this afternoon I can confirm that as at the 21<sup>st</sup> May 2014 there are 2906 households registered on homefindersomerset for rehousing in South Somerset.

Of those 2906 126 have indicated a first choice parish of Wincanton. This is broken down in to Banding;  
67 in Bronze band  
43 in Silver band  
16 in Gold band

I have looked at the 126 applications and can confirm that 35 in Bronze band have a Wincanton address, 24 in Silver band have a Wincanton address and 5 in Gold band have a Wincanton address.

If you require any further information please do not hesitate to contact me.

Kind Regards

Louise

Louise Field BA (HONS) CIHCM  
Acting Housing Development Officer  
South Somerset District Council  
Tel: 01935 462064

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