

Wincanton Neighbourhood Plan Submission

South Somerset District Council Comments

Spatial Policy Team: June 2017

| Section/ Page/ Policy | SSDC Comments |
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| Section 2.3 – Planning Context | It would be useful to reference the relevant Local Plan policies ie. SS1, SS3 and SS5. |
| Section 5 – Page 10 (5.3) | It is not clear that the organisations listed in the table have been consulted or agreed with the aims. Could other organisations be added? For example, Protecting Wincanton Community Hospital – add Friends of Community Hospital; Improving Primary Care – add Friends of Community Hospital and Balsam Centre; Town Centre Development – should the Chamber of Commerce, or Wincanton Business Together be involved? |
| Section 6 – Housing Page 11 | The position in respect of the five-year housing land supply has changed following the Ministerial Statement made on 12 th December 2016. There is an opportunity now to refer to the fact that the Neighbourhood Plan would not be considered out-of-date if the Local Authority can demonstrate a three-year housing land supply. |
| Section 6 – Housing Page 12 (6.1) South West of the Town | This should be updated to reflect the latest information on need – see Somerset County Council's Early Years and School Place Planning Infrastructure Growth Plan for Somerset 2016. The requirement for a new primary school is understood to have been superseded following the approval and subsequent construction of an extension on additional land behind the existing school. |
| Section 6 – Housing Pages 14/15 and Policy 5 | It is not clear which proposals should include a landscape scheme. |
| Section 6 – Housing Page 16 (6.2) | It would be useful to reference the data sources here. |
| Section 6 – Housing Page 17 (6.2) Policy 7 | This policy is overly restrictive and does not make provision for four-bed dwellings. There is no definition of what would be used to determine what “a significant proportion” is. Neither does the policy address the evidence that one-bedroom properties are difficult to sell. The Housing Review report submitted with the Submission Draft Plan does not provide sufficient evidence to support this policy. |

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| <p>Section 6 – Housing Page 17 (6.2) Policy 8</p> | <p>This is adequately dealt with by National and Local Plan policies.</p> <p>Paragraph 8.46 of the Strategic Housing Market Assessment (October 2016) states <i>“On balance, this analysis would suggest that there is likely to be sufficient demand for 20% of housing to be provided as Starter Homes although issues about the affordability of such a product remain. As currently worded, the Housing and Planning Act seems likely to require local authorities to provide at least 20% of housing as Starter Homes. Were there to be a degree of flexibility in the proportion of homes to be provided within this tenure then the Councils will need to consider this by balancing the needs for more traditional forms of affordable housing. This could well be through seeking a lower proportion of Starter Homes (or possibly none); <u>recognising that these households with the potential to afford such a product will already be able to meet their own needs in the housing market (through renting privately)</u>”</i></p> <p>The Housing White Paper 2017 subsequently implies that the Government has decided not to implement a statutory starter homes requirement.</p> <p>A local connection is not defined in the Draft Neighbourhood Plan and may not be possible to enforce; and ‘affordable level’ is not defined and may also not be enforceable.</p> <p>The Housing Review Report submitted with the Submission Draft Plan does not provide sufficient evidence to support this policy.</p> |
| <p>Section 6 – Housing Page 18 (6.2) Policy 9</p> | <p>This is adequately dealt with by National and Local Plan policies. Any requirements regarding Building Regulations technical standards cannot be included in an Neighbourhood Plan.</p> <p>The Housing Review Report submitted with the Submission Draft Plan does not provide sufficient evidence to support this policy.</p> |
| <p>Section 6 – Housing Page 18 (6.2) Policy 10</p> | <p>Such a policy will inevitably cause uncertainties for developer funding and planning, impacting on overall delivery. An encouragement to engage with the local planning authority in relation to registered (and funded) self-builders might actually prove more effective in meeting the housing needs of this group. There is no clear evidence for the threshold of 30 dwellings for the requirement.</p> |
| <p>Page 20 Second paragraph after bullet points</p> | <p>Should state a, ”direction of growth is included...” rather than “was included”. The Consultation Statement does not refer to the District Council’s earlier comment in this regard.</p> |

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| <p>Page 20 Third paragraph after bullet points</p> | <p>“...and other uses typically found on large industrial estates” is unclear. It is suggested that the phrase and other economic development uses” is used. The Consultation Statement does not refer to the District Council’s earlier comment in this regard.</p> |
| <p>Policies 7, 8, 9 and 10; Housing Types; Starter/ Adaptable and Self-Build Homes.</p> | <p>These policies go beyond the requirements of policies HG3 and HG5 of the Local Plan; and seek to overly restrict the market.</p> <p>There is conflicting evidence provided for justification in the Housing Review Report:</p> <ul style="list-style-type: none"> • Average build rates show wide annual fluctuations and recent completions have not been especially excessive in comparison. • The population profile, health and household statistics are broadly in line with regional averages and there doesn’t appear to be the need for Wincanton to be treated as a ‘special case’. • Anecdotal feedback from estate agents suggests that one-bedroom flats are difficult to sell. • Whilst there were 78 applicants on the Housing Register expressing an interest in being housed in Wincanton, 54% were in the lowest band of need. The source of the information regarding a local connection is not clear. • The conclusion that 50% of new dwellings should be of one or two-bedrooms can be ascertained from the table referred to, but only with the additional knowledge of the relative percentages of affordable, intermediate and market homes built. The table also refers to the District as a whole. • There has been no interest in self-build dwellings in Wincanton. • There does not appear to be any evidence supporting the assertion that 30-40% of households in the next ten years are likely to require higher accessibility homes. |
| <p>Section 7 – Employment Pages 19/20 and Policy 11</p> | <p>As worded, the policy suggests that the continuing use of B1 premises is not a consideration; and it could be more clearly worded. Local Plan Policy EP3 specifically applies to B1, B2 and B8 uses and does not limit itself to development in side of the development area. It is suggested that Policy EP3 adequately addresses this issue and that the draft policy needs more thought or should be omitted.</p> <p>What the District Councils’ original comments stated was actually: <i>Why have B1 uses been excluded? The interaction between the three bullet points is not clear and does not provide a clear policy approach for a potential applicant to follow. The first two bullets do not seem to sit well against each other. With regard to the mix of uses and their compatibility, what proportion? What is the area you are referring to? Wincanton as a whole? Or specific employment areas which should be named? LP Policy EP3 specifically applies to B1, B2 and B8 uses and does not limit itself to development inside of the development area. Suggest that the policy needs more thought or is not required as LP Policy EP3 addresses this issue.</i></p> |

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| <p>Section 7 – Employment Pages 20/21 and Policy 12</p> | <p>The policy needs to be more precisely worded as it is currently unclear how a judgement could be made on whether the criteria are met; for example, what would be an unacceptable level of transport movements? Should this apply to all economic development proposals or just B1, B2 or B8 uses? Would it apply to the town centre area?</p> |
| <p>Policies 11 and 12 – Existing and New Employment sites.</p> | <p>The submitted Business Needs Report does not take into account the rise in employment floorspace in a disproportionate way to net land gain; or the other economic considerations set out in the District Council’s Economic Development Monitoring Report (April 2017); or the South Somerset Employment Land Evidence: ‘Long Term Economic Forecasting and Implications for Employment Sites and Premises’ (July 2017); and ‘Review of FEMAs and Understanding Market Trends’.</p> <p>What is becoming clearer is that business needs can be met without the sole reliance on release of new employment land.</p> <p>The policies do not accord with Policies EP3 and EP4 of the Local Plan.</p> |
| <p>Section 7 – Employment Page 21 and Policy 13</p> | <p>Local; Plan Policy TA6 relates to parking standards. New developments can only be expected to address parking issues related directly to their own proposals.</p> |
| <p>Section 9 – Environment Pages 24/25/26 and Policy 14</p> | <p>The access to Home Drive Playing field should be clarified. It is understood that this is currently utilised by a pre-school. Does it have only visual amenity value?</p> |