

Land at Manor Farm,
Templecombe
**1st DRAFT Housing Land
Supply Statement of Common
Ground**

“Outline application for the demolition of existing buildings and residential development of 60 units including the creation of a new vehicular access and pedestrian accesses, open space, landscape planting and surface water attenuation (all matters reserved except access)”

April 2021

Appeal Ref: APP R3325/W/20/3265558

Appellant: Gleeson Strategic Land Ltd

Local Planning Authority: South Somerset
District Council

The logo for ORIGIN3 features a large orange circle on the left, followed by the word "ORIGIN" in a grey, sans-serif font, and a large "3" in the same grey font to the right.

Planning . Design . Development

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This 1st DRAFT HLS SOCG (CD Ref: 13.06) is submitted by Origin3 on behalf of Gleeson Strategic Land Ltd (the Appellant):

APP REF/R3325/W/20/3265558

| Issue | Gleeson Strategic Land | South Somerset Council |
|---|--|------------------------------|
| 1.0 The Planning Application (19/03416/OUT) | | |
| 1.1 | <p>The description of development is:</p> <p><i>“Outline application for the demolition of existing buildings and residential development of 60 units including the creation of a new vehicular access and pedestrian accesses, open space, landscape planting and surface water attenuation (all matters reserved except access)”.</i></p> | Agreed |
| 1.2 | <p>The Proposal offers a policy compliant 35% level of Affordable Housing split 80 / 20, social rent / intermediate product or other intermediate affordable solution. This equates to 21 units based on a development of 60 dwellings - split as 17 for social rent and 4 for shared ownership or other intermediate affordable solution to be agreed in writing by the Lead Specialist Planning in consultation with the Council’s Housing Specialist.</p> | Agreed |

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| 2.0 Existing completions and Commitments in Templecombe. | | |
| 2.1 | Total Completions 2006 - January 31 st 2021 62 dwellings (net). | |
| 2.2 | <p>Pending as at 19th March 2021</p> <ul style="list-style-type: none"> ○ 18/00650/OUT – demolition of existing care home and erection of 19 dwellings, Knights Templar Court Nursing Home (19 units, but only 10 additional pending). Resolution to grant: 20 November 2018. ○ 19/00123/OUT - demolition of existing care home and erection of 21 dwellings, Knights Templar Court Nursing Home (21 units but only 11 additional pending) ○ 19/03416/OUT - Land at Manor Farm, Combe Hill (60 units pending) ○ 19/01604/OUT - West Street (49 units pending) <p>Total Pending at 19th March = 119-120 units including:</p> <p>21/00046/REM - Slades Hill Reserved Matters (70 units pending).</p> | |

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| <p>20/00569/FUL – 1 dwelling at Long Byr (approved).</p> <p>20/01031/FUL - 1 dwelling 3 High Street (approved).</p> <p>Total Pipeline = 191-192 new homes.</p> | | |
| <p>2.3 Of the Total completions from 2006 to date, Templecombe none were affordable homes.</p> | Agreed | |
| <p>2.4 Dwellings in the BUA 2011 Census comprised 746. Delegated Report suggests further 28 dwellings completed April 2011 to March 2019 = 28. Therefore total dwellings = 774.</p> | Agreed | |
| <p>2.5 Mid-year population in Templecombe Parish ONS 2019 is 1571.</p> | Agreed | |
| <p>2.6 An increase of 191 new dwellings would therefore be 24.7% increase in housing stock (192 dwellings would result in a 24.8% increase) and an additional 439 people or 28% increase in population.</p> | Agreed | |
| <p>2.7 The 289 increase in new dwellings referred to in the West Street planning officers report was incorrect and included 85 over count by SSDC.</p> | Agreed | |
| <p>2.8 Total completions and commitments (including 60 at Manor Farm) at 1st April 2021 = 251-252 units.</p> | Agreed | |
| <p>2.9 West Street section 106 agreement was not signed as at 1st April 2021.</p> | Agreed | |

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| 3.0 Completions and Commitments in South Somerset | | |
| 3.1 | <p>South Somerset have completed the following number of dwellings annually as published in table :</p> <p>South Somerset District Council – Net Housing Completions (2006/2007 – 2019/2020) March 2021.</p> <ul style="list-style-type: none"> ○ 2006/7 – 620 dwellings ○ 2007/8 -724 dwellings ○ 2008/9 – 547 dwellings ○ 2009/10 – 482 dwellings ○ 2010/11 – 984 dwellings ○ 2011/12 – 480 dwellings ○ 2012/13 – 528 dwellings ○ 2013/14 – 511 dwellings ○ 2014/15 – 770 dwellings ○ 2015/16 – 606 dwellings ○ 2016/17 – 616 dwelling ○ 2017/18 – 563 dwellings ○ 2018/19 – 650 dwellings | Agreed |

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| <ul style="list-style-type: none"> ○ 2019/20 – 651 dwellings ○ 2020/21- 314 dwellings NB to February 2021, provided by SSDC <p>From 2006 – 2020 average annual completions have been 624 dpa.</p> | | |
| <p>3.2 Completions for 1st April 2020-31st March 2021 are 314 dwellings.</p> | Agreed | |
| <p>3.3 The SSDC November 2020 Five Year Housing Land Supply Position Statement projects the following number of dwellings will be delivered in South Somerset over the next 5 years:</p> <ul style="list-style-type: none"> ○ 2020/21 – 859 dwellings (but actual completion figures are 314 to February 2021) ○ 2021/22 – 1,576 dwellings ○ 2022/23 – 840 dwellings ○ 2023/24 – 674 dwellings ○ 2024/25 – 419 dwellings <p>This is a main point of dispute between the parties. Table 8.6 and Table 8.7 in the appellant’s evidence shows an alternative trajectory.</p> <ul style="list-style-type: none"> ○ 2020/21 – 314 dwellings. ○ 2021/22 – 855 (798*) dwellings ○ 2022/23 – 785 (728*) dwellings ○ 2023/24 – 713 (656*) dwellings | Agreed | |

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| <ul style="list-style-type: none"> ○ 2024/25 – 564 (507*) dwellings (* = application of 138 average dpa for ROD) | | |
| <p>3.4 The 5 year annual projected average 2020-2025 is therefore 874. An average annual delivery rate of 874 dwellings a year is anticipated in the November 2020 5YHLS Report. The Council have only ever achieved this figure once in 2010/11 in the last 14 years. This is a considerable increase on the 14 year average of 624 dpa of an additional 250 dpa each year for 5 years.</p> | Agreed | |
| <p>3.5 Information in the following tables (appended at 1) is correct. These are contained in Mr Orton’s POE at Appendix 14.</p> <p>Table 8.1 District Wide Completions V SSDC 5YHLS Projections.</p> <p>Table 8.2 District and Settlement Completions and Projections.</p> <p>Table 8.3 Comparison of Completions and Projections Yeovil.</p> <p>Table 8.4 Actual Completions 2006-2020 and SSDC 5YR Projections.</p> <p>Table 8.6 Origin3 V SSDC Projection Summary.</p> <p>Data in the tables is taken from the Council’s own data sets and reflects the historic levels of completions</p> | Agreed | |

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through the life of the plan at District and Settlement levels. This is information from all available AMR's (2015/2016, 2016/2017, 2017/2018, 2018/2019) and the last 5 years of HLS Monitoring reports and completions data provided by the LPA which records all completions. The tables also include the projections made each year by the LPA on a district and settlement basis.

Data from 2012/13 to 2018/19 Three Dragons Table is used to illustrate that completions have averaged 606 units per annum.

Table 4.3a Annual approvals and delivery

| What did 5yrs say would take place | 2012/13 | 2013/14 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 |
|------------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| 2015/16 | | | | 865 | 929 | 783 | 1059 | 838 | | | | |
| 2016/17 | | | | | 630 | 908 | 916 | 1127 | 973 | | | |
| 2017/18 | | | | | | 660 | 1099 | 894 | 952 | 1008 | | |
| 2018/19 | | | | | | | 681 | 1155 | 1010 | 783 | 772 | |
| 2019/2020 | | | | | | | | 1049 | 1228 | 1009 | 610 | 558 |
| Completions | 528 | 511 | 770 | 606 | 616 | 563 | 650 | | | | | |
| Approvals | | | 500 | 331 | 1730 | 792 | 2389 | | | | | |

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| 4.0 Affordable Housing | | | |
| 4.1 | Over the seven years 2012/13 to 2018/19, affordable housing completions represented 17.9% of total completions against a policy requirement of 35%. | Agreed | |
| 4.2 | There has been no affordable housing delivered in Templecombe in the first 14 years of the Plan period. | Agreed | |
| 4.3 | The appeal proposal complies with Policy HG3 through provision of 21 new affordable homes. | Agreed | |
| 4.4 | Rural Housing Dataset 2019/20 suggests 16 applicants on register for Abbas and Templecombe at 1 st November 2018. | Agreed | |
| 4.5 | 25 new affordable homes are proposed at Thales. | Agreed | |
| 4.6 | Affordable housing provision at West street would be 17. | Agreed | |
| 4.7 | Potential pipeline of affordable homes would be 63 (which includes Manor Farm, West Street, and Thales). | Agreed | |
| 4.8 | Mr Kenyon's email of the 23 rd March 2021 (shows active applications on Homefinder) suggests need for 138 across qualifying parishes. | Agreed | |
| 4.9 | At District level Homefinder identifies need for 1934 households registered. | Agreed | |
| 4.10 | Average net completions (2006/2007 – 2018/2019) at District level 129 affordable homes per year (Three Dragons table 4.5). | Agreed | |

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| 4.11 | Emerging policy HG2 reduces requirement to 28%. | Agreed | |
| 5.0 The Housing Requirement Figure | | | |
| 5.1 | The Council's latest position confirmed in the March addendum is a 6.03 year supply based on a 5% buffer. | Agreed | |
| 5.2 | This was previously 6.15 years as shown in the January 2021 addendum. | Agreed | |
| 5.3 | The SSDC Plan annual requirement is 725 dpa. | Agreed | |
| 5.4 | The January 2021 addendum based on SM showed a basic annual requirement of 677 dpa. | Agreed | |
| 5.5 | The March 2021 addendum identifies (following the publication of 2020 median affordability ratio) a basic annual requirement of 690 dpa. | Agreed | |
| 5.6 | 690 dpa is the correct figure to use to calculate the requirement based on latest data as agreed by the parties. | Agreed | |
| 5.7 | $690 \times 5 =$ basic 5 year requirement of 3450 before buffer. | Agreed | |
| 5.8 | The relevant buffer however is not agreed between the parties. | Agreed | |

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| 5.9 | To assist the Appeal the following is accurate through application of both a 5% and 10% buffer. | Agreed | |
| 5.10 | Five year Basic Housing Requirement at 10% Buffer | | |
| | Annual Requirement (690 dpa x 5 Years) | = 3450 dwellings | |
| | 3450 x 1.10 | = 3795 dwellings | |
| | Minimum annual housing requirement 3795/ 5 years | = 759 dpa | |
| | Five year Basic Housing Requirement at 5% Buffer | | |
| | Annual Requirement (690 dpa x 5 Years) | = 3450 dwellings | |
| 3450 x 1.05 | = 3623 (rounded) | | |
| Minimum annual housing requirement 3623/5 | = 725 (rounded) | | |
| 6.0 Housing Land Supply | | | |
| 6.1 | The Council suggest they can now show 6.03 years of supply applying a 5% buffer. | Agreed | |
| 6.2 | The Council's November 2020 Report suggests a pipeline supply of 4368 homes 2020-2025 (Appendix 1). | Agreed | |

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| 6.3 | Applying a 5% discount for non implementation and adding back in 100 windfalls and 123 dwellings from care homes gives a total supply figure of 4373. The application of a minimum annual requirement of 725 dpa against this supply assumption equals 6.03 years supply. | Agreed | |
| 6.4 | The table below is taken from page 194 of Mr Orton's Appendix 15 Table 8.7 identifies alternative supply totals, which whilst not agreed summarise the differences between the parties in terms of totals. | Agreed | |

| Site Name | HELAA | Planning | 20-21 | 21-22 | 22-23 | 23-24 | 24-25 | 25-26 | 25-30 | 30-35 | Total Delivery (Net) 2020- | Description / Rationale | |
|----------------------------|-------|----------|-----------|-----------|-----------|-----------|-----------|-------|-------|-------|----------------------------|--|--|
| REST OF DISTRICT SUB-TOTAL | | | 193 | 495 | 152 | 156 | 129 | | 1009 | 86 | 2220 | | |
| LPA 5YHLS | | | 1125 | | | | | | | | | | |
| ORIGIN3 ROD SUB-TOTAL | | | 44 | 195 (138) | 195 (138) | 195 (138) | 195 (138) | | | | | NB: 195 Highest delivery in 14 years 2019/20 (138) Average for R.O.D | |
| ORIGIN3 5YHLS | | | 824 (596) | | | | | | | | | (596) Based on a 14 year average of 138 dpa. | |

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| Site Name | HELAA | Planning | 20-21 | 21-22 | 22-23 | 23-24 | 24-25 | 25-26 | 25-30 | 30-35 | Total Housing |
|------------------------------------|-------|----------|-------------|-------|-------|-------|-------|-------|-------|-------|---------------|
| LPA AREA TOTALS + R.O.D | | | | | | | | | | | |
| | | | 4368 | | | | | | 7290 | 3866 | 15430 |
| ORIGIN3 AREA TOTALS + R.O.D | | | 314 | 855 | 785 | 713 | 564 | | | | |
| ORIGIN3 5YHLS + R.O.D | | | 3231 (3003) | | | | | | | | |

*Brackets indicate the R.O.D Based on Average of 138 per year

| 5YHLS Totals | | | | | | | | | | | | |
|--|--|--|-------------|--|--|--|--|--|--|--|--|--|
| Minus 5% Discount for Non-Implementation | | | 4150 | | | | | | | | | |
| Care Homes | | | 123 | | | | | | | | | |
| Windfall Allowance | | | 100 | | | | | | | | | |
| Grand Total | | | 4373 | | | | | | | | | |
| Minus 11% Discount for Non-Implementation | | | 2876 (2673) | | | | | | | | | |
| Care Homes + 62 50% | | | 62 | | | | | | | | | |
| Windfall Allowance + 100 | | | 100 | | | | | | | | | |
| Grand Total | | | 3038 (2835) | | | | | | | | | |

*Brackets indicate the R.O.D Based on Average of 138 per year

6.5 The difference between the parties on supply for the period 2020 -2025 is the difference between **4368-3231 = 1137** before the application of a non implementation rate and care homes are added back in.

Agreed

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| | When this is done the difference is 4373-3038 = 1335 . | | |
| 6.6 | Between 2006-2020 the average delivery rate from ROD was 138. The highest recorded rate was 195 in 2019/20. | Agreed | |
| 6.7 | Windfall rate is 100 or 20 dpa. | Agreed | |
| 7.0 Non implementation rate | | | |
| 7.0 | Applying an 11% average non implementation across the 5 year period – Appellant’s approach. | Agreed | |
| 7.1 | Applying a 5% non implementation rate – LPA’s approach. | Agreed | |
| 7.2 | <u>Impacts of Covid on Implementation and Supply</u> Paragraph 4.45 of the Three Dragons report (CD 11.16) references the recent appeal (APP/X0360/W/19/3238048) Land North of Nine Mile Ride, Berkshire. In this appeal 3% of the supply was taken out to calculate the 5YHLS to account for Covid 19. | Agreed | |
| 7.3 | <u>Non implementation figure</u> The robustness of a 5% non-implementation rate is not agreed by Appellant. Three Dragons reported that only around 78% of predicted approvals over that 5-year period translated into completions. This is a 22% discount, based on 6 years of monitoring data. | Agreed | |

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| 7.4 | 11/12 th supply requirement in HDT is the equivalent of an 8.4% reduction (8% rounded). This was in recognition of the impacts of Covid. | |
| 7.5 | A mid point non implementation average rate between this and the Councils 5% would be 13.5% | |
| 7.6 | <p><u>Annual Shortfall 2020/2021</u></p> <p>Completions for 2021 as provide suggests 314 as at end of February 2021. This is 411 less than the annual requirement at 5% buffer and 448 below the 759 annual requirement if a 10% buffer is applied. It is also 545 less than the Council projected in the first year of the 5 year trajectory of 859 for that year.</p> | |
| 7.7 | The table below is agreed when both the 725 (690 annual requirement inflated by 5%) and 759 (690 annual requirement inflated by 10%) annual requirement are applied to the Appellants 5 year supply 2020-2025 projections albeit the LPA does not agree with the total figures arrived at the calculation is however accurate. | |

| | | | |
|---|-----------------------|--------|--|
| 7.145 | 7.146 Total Dwellings | Agreed | |
| Total 5 year supply for 2020-25 | 3038 | | |
| 7.147 Divide by 759 | 4.00 years supply | | |
| 7.148 Divide by 725 | 4.19 years supply | | |
| 7.149 | 7.150 Total Dwellings | | |
| Total 5 year supply for 2020-25 | 2835 | | |
| 7.151 Divide by 759 | 3.73 years supply | | |
| 7.152 7.153 Divide by 725 | 3.91 years supply | | |
| <i>See table 8.7 of the Origin3 Planning Proof of Evidence (Jonathan Orton)</i> | | | |

