

Rebuttal Proof of Evidence of Jamie Wallace

Land North of Ansford Hill,
Ansford, Castle Cary, Somerset,
BA7 7PD

Prepared on behalf of
**South Somerset District
Council**

Appeal Reference: APP/R3325/W/20/3259668
October 2021



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CHARTERED TOWN PLANNERS

Bell Cornwell LLP, The Print Rooms,
164/180 Union Street, London, SE1 0LH

020 3960 1530 | info@bell-cornwell.co.uk | bell-cornwell.co.uk



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1 INTRODUCTION

- 1.1 This rebuttal proof of evidence has been prepared to provide responses, where considered necessary, in response to specific points in the Proofs of Evidence prepared by Mr Richards on Housing Land Supply matters and Mr Roach on the weight given to affordable housing provision in the Planning Balance.
- 1.2 This rebuttal serves as an addendum to my proof of the 18th of October 2021 and provides an update in relation to the 5-Year Housing Land Supply calculation, along with further consideration of the planning balance with particular regard to affordable housing provision.
- 1.3 This rebuttal does not address all of the points presented within the Appellants Proofs of Evidence but focusses on specific matters where these are best addressed ahead of the Inquiry.
- 1.4 In-line with my Proof of Evidence of the 18th of October 2021, the opinions expressed within this rebuttal are my true and professional opinions and are given in accordance with the guidance of my professional institution, the Royal Town Planning Institute.



2 THE EVIDENCE OF MR RICHARDS

2.1 The following comments are made in response to the Proof of Evidence as prepared by Mr Richards, with reference to the specific paragraph numbers to which they relate.

LAND AT STALBRIDGE ROAD, HENSTRIDGE – CONTESTED SITE

2.2 Within Paragraph 7.35 reference is made to the email correspondence with the agent not being included within the Council's 'Position Statement'.

2.3 Email correspondence providing the most up-to-date position on the submission of a reserved matters application for the site is appended to this rebuttal. This correspondence clearly identifies that a house builder (Barratt) will be progressing the reserved matters submission.

2.4 In addition to a housebuilder having been appointed, a date has been agreed for a 'validation meeting' between South Somerset District Council and their agent on Monday 25th October 2021. This is in advance of the imminent submission anticipated shortly afterwards.

LAND AT 166 HENDFORD HILL – CONTESTED SITE

2.5 Paragraph 7.46 identifies that the extant planning permission associated with the site is due to expire and no pre-commencement conditions have to date been satisfied. The site is also on the market and as such it is suggested that there is no clear evidence that the site can be delivered in accordance with the requirements of the National Planning Policy Framework 2021 (NPPF).

2.6 On further review of the latest position regarding the deliverability of the site and in the interest of ensuring a robustly evidenced Housing Land Supply position, the Council has agreed to remove the site. This equates to the reduction of 22 units from the Housing Land Supply.

5-YEAR HOUSING LAND SUPPLY RE-CALCULATION



2.7 Whilst reviewing the 5-Year Housing Land Supply position a further five sites are also considered not to meet the test of deliverability. These include the following:

- Dreamers Farm, North Brewham – Planning Application Reference: 21/00027/PAMB.
- Land at Larkside Farm, Broad Street, Charlton Adam – Planning Application Reference: 20/03317/PAMB
- 2 Wood Road, Ashill – Planning Application Reference: 18/04010/PAPA
- Land at Owl Street, Stocklinch – Planning Application Reference: 20/00504/PAMB
- Land at Owl Street, Stocklinch – Planning Application Reference: 20/00502/PAMB

2.8 All of the above sites deliver one unit each, achieved through the granting of prior approval. As each of the sites are held up awaiting a Phosphates solution, they have also been removed from the Housing Land Supply, equating to a reduction of 5 units.

2.9 On this basis the revised 5-Year Housing Land Supply calculation is set out in the table below. I have included a column to allow for the post publication reductions.

		Initial publication adjustment	post publication adjustment	Further enclosed post publication adjustment
Total annual requirement including 5% buffer	3,623 dwellings	No Change		No Change
Deliverable supply (based on projected completions)	3,391 dwellings	3,356 dwellings		3,331 dwellings



2021/22 to 2025/26)			
5-Year Housing Land Supply (rounded)	4.7	4.6	4.6
Shortfall	232	267	292



3 THE EVIDENCE OF MR ROACH

3.1 The following comments are made in response to the Proof of Evidence as prepared by Mr Roach, with reference to the specific paragraph numbers to which they relate.

AFFORDABLE HOUSING – PLANNING BALANCE

3.2 It is presented within paragraph 4.78 that having considered the Proof of Evidence as prepared by Mr Stacey on affordable housing matters, that *“there is no step change in the provision of affordable housing on the horizon for South Somerset District.”*

3.3 Paragraph 4.79 goes on to state that *“for these reasons and others contained in Mr Stacey’s evidence, provision of affordable housing should be recognised as a substantial benefit of the appeal proposals and should be afforded very significant weight in the determination of this appeal.”*

3.4 The basis upon which these statements are made, rely on the evidence of Mr Stacey. Mr Stacey has undertaken a review of affordable housing delivery across South Somerset District as a whole and provided an assessment of the backlog.

3.5 However, the Government’s methodology for calculating the Local Housing Need applies an affordability adjustment which is an integral part of the calculation, which takes account of any backlog and it is not, therefore necessary, to address this matter separately.

3.6 The appeal proposal meets the 35% affordable housing requirement as set out in Local Plan Policy HG3, delivering 70 units. This would make a valuable contribution to the district wide demand for affordable housing. However, the Local Plan identifies that any affordable housing requirement should meet local needs.

3.7 No substantial evidence is offered by Mr Roach or Mr Stacey as to any identified verified need for an additional 70 affordable units within Ansford/Castle Cary themselves.

3.8 In paragraph 4.76, reference is made to the Inspectors report who presided over the Wayside Farm appeal (Appeal Ref: APP/R3325/W/15/3121541). This reference is in



context of the 'significant weight' the Inspector gave to the contribution made to affordable housing provision within the scheme. The decision issued 12th January 2017 made reference to the fact that at the time, no affordable housing provision had been provided within Ansford/Castle Cary in the previous 5 years.

3.9 On 5th of October 2021 South Somerset District Council published the latest housing register (Appendix 2), identifying all active applications on Homefinder Somerset. This identifies a total need in Castle Cary for 71 units and 2 units in Ansford.

3.10 In context of this need, the table below identifies two schemes currently under construction in Castle Cary and the associated affordable housing delivery.

Site	Affordable Units Delivered	Affordable units still to be delivered	Total affordable units
18/02986/REM Wayside Farm (Stonewater)	9	116	125
16/01912/REM Station Road (Abri)	36	14	50

3.11 Having regard to the affordable housing provision to be delivered as part of these two schemes alone, there is sufficient trajectory to meet the identified need of the housing register.

3.12 In summary, it is acknowledged that there is a need for affordable housing provision at the District level, however the appellant has not identified a need for the 70 affordable units provided by the appeal scheme. On balance therefore, in absence of a verified local need the benefit of the proposed level of provision of affordable housing units within the appeal scheme should be given medium to significant weight.



APPENDIX 1 – LAND AT STALBRIDGE ROAD EMAIL CORRESPONDANCE

Jamie Wallace

From: John Hammond <John.Hammond@SouthSomerset.Gov.Uk>
Sent: 25 October 2021 10:00
To: Jamie Wallace
Subject: FW: Barratt David Wilson proposals at Henstridge South Somerset

fyi

John Hammond Lead Specialist Built Environment

Service Delivery

South Somerset District Council

+441935462531

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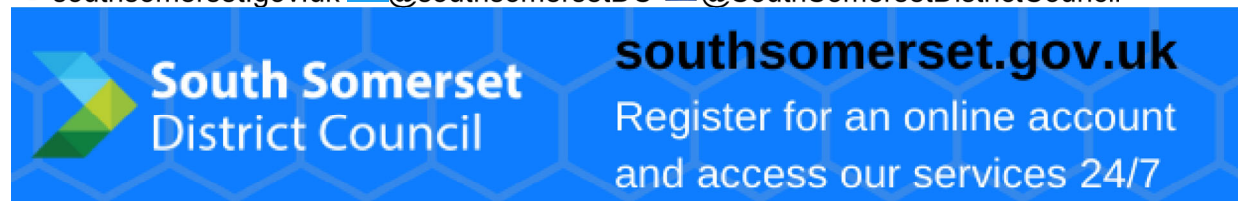
John Hammond Specialist - Principal Planner

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South Somerset District Council

+441935462462

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From: John-Rhys Davies <johnrhysdavies@lrmpanning.com>
Sent: 21 October 2021 14:22
To: John Hammond <John.Hammond@SouthSomerset.Gov.Uk>
Subject: RE: Barratt David Wilson proposals at Henstridge South Somerset

Thanks for your assistance.

Kind regards,

John-Rhys Davies MRTPI
Principal Planner

t: 02920 349737 m: 07917 908502
website: lrmpanning.com
twitter: @lrmpanning

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ
Registered Address: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ



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From: John Hammond <John.Hammond@SouthSomerset.Gov.Uk>
Sent: 21 October 2021 12:19
To: John-Rhys Davies <johnrhysdavies@lrmpanning.com>
Subject: RE: Barratt David Wilson proposals at Henstridge South Somerset

Thanks John,

Trudy will set this up shortly

John

John Hammond
Lead Specialist Built Environment
Service Delivery
South Somerset District Council

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From: John-Rhys Davies <johnrhysdavies@lrmplanning.com>
Sent: 21 October 2021 11:32
To: John Hammond <John.Hammond@SouthSomerset.Gov.Uk>
Subject: RE: Barratt David Wilson proposals at Henstridge South Somerset

Hi John,

Can we please confirm for Monday 25th at 4pm with Trudy and Jaana. It will just be me representing the applicant and I can run through the submission documents via Microsoft teams. Please send me a calendar invite when you get a chance.

Kind regards,

John-Rhys Davies MRTPI
Principal Planner

t: 02920 349737 m: 07917 908502
website: lrmplanning.com
twitter: @lrmplanning

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ
Registered Address: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ



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From: John Hammond <John.Hammond@SouthSomerset.Gov.Uk>
Sent: 21 October 2021 09:09
To: John-Rhys Davies <johnrhysdavies@lrmplanning.com>
Subject: RE: Barratt David Wilson proposals at Henstridge South Somerset

Hi John

To confirm,

The case officer, Trudy Gallagher and validation officer Jaana Kirby can do Mon & Tuesday next week at 4pm, or Wednesday & Thursday at 10 am,

I am available with Trudy & Jaana the following week on 1st and 2nd at 4pm and Thursday 4th at 10 am.

There is no reason for you not to pre-empt the meeting with your submission, the meeting will allow us to go through all documents required etc. We won't have had time to check all plans for accuracy if the meeting is concurrent with the submission, however if you prefer to hold off submission for a plans check this can be arranged.

I look forward to hearing from you & BDW regarding a date.

KR

John

John Hammond
Lead Specialist Built Environment

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From: John-Rhys Davies <johnrhysdavies@lrmpanning.com>
Sent: 21 October 2021 09:02
To: John Hammond <John.Hammond@SouthSomerset.Gov.Uk>
Subject: RE: Barratt David Wilson proposals at Henstridge South Somerset

Hi John,

Thanks for your time yesterday, from our discussion I understand that the Council will have availability for a validation meeting either;

- Next week w/c 25th October - Monday PM, Tuesday PM, Wednesday AM; or
- The week after w/c 1st November – Monday AM, Tuesday AM, Wednesday PM.

Our application will be submitted following our client's sign off and we will be targeting one of the above following submission. Could you please remind me the timings available and advise on how much time would be required between submission and the meeting?

Kind regards,

John-Rhys Davies MRTPI
Principal Planner

t: 02920 349737 m: 07917 908502

website: lrmplanning.com
twitter: [@lrmpplanning](https://twitter.com/lrmpplanning)

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ
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APPENDIX 2 – HOMEFINDER SOMERSET ACTIVE APPLICATIONS REGISTER

Parish	1 Bed Need	2 Bed Need	3 Bed Need	4 Bed Need	5 Bed Need	6 Bed Need	Grand Total
Abbas and Templecombe	1	2	4	2			9
Ansford	1				1		2
Ash		1					1
Ashill				1			1
Babcary		1					1
Barrington	1						1
Barton St David	1						1
Barwick	3	1	1	1	1		7
Brewham		1					1
Broadway		1	1				2
Bruton	7	7	4		2		20
Brympton	13	3	1	1			18
Buckland St Mary		1	1				2
Castle Cary	37	18	11	3	2		71
Chard	107	58	36	9	1		211
Charlton Horethorne		1					1
Charlton Mackerell	1						1
Chilthorne Domer		1	1	1			3
Chiselborough		2					2
Combe St Nicholas	4	1		1			6
Compton Dundon	4		1				5
Crewkerne	39	31	19	3	1		93
Cucklington			1				1
Curry Mallet	1						1
Curry Rivel	6	3	1				10
Dowlish Wake		1					1
East Coker	4	2	1				7
Fivehead		1					1
Haselbury Plucknett	3	1		1			5
Henstridge	2	3	3				8
High Ham		2					2
Hinton St George		1					1
Horsington	1		1				2
Horton		1					1
Huish Episcopi	2						2
Ilchester	9	8	5				22
Ilminster	51	22	15	3			91
Ilton	1			1			2
Keinton Manderville	1	2	1				4
Kingsbury Episcopi	1	1	2				4
Langport	27	18	6	1			52
Long Load		1					1
Long Sutton	1	2					3
Lovington	1						1
Martock	29	16	4	2			51
Merriott	4	4	3	1			12
Milborne Port	13	8	5	1			27
Misterton	1						1
Montacute	1	3		3			7
Mudford	2	1		1			4
North Barrow						1	1
North Cadbury	2	1					3
Norton-Sub-Hamdon	2	3	1				6
Odcombe	1	1					2
Penselwood		1	2				3
Queen Camel	5	2	4	1			12
Seavington St Michael	1						1
Shepton Beauchamp	1						1
Somerton	35	21	10	2			68
South Cadbury		1					1
South Petherton	22	17	8	2	1		50
Sparkford	3			1			4
Stoke-Sub-Hamdon	15	7	3	2	2		29
Tatworth and Forton	10	11	5	4			30
Tintinhull	3	2					5
Wambrook			1				1
West Camel	1		1				2
West Chinnock	1	1					2
West Coker	4	4		1			9
West Crewkerne	3						3
Whitestaunton	3	1					4
Wincanton	47	37	22	2	1		109
Winsham	4	1					5
Yarlington	1			1			2
Yeovil	393	215	110	33	7		758
Yeovil Without	1	2					3
Grand Total	938	559	295	85	19	1	1897