

Rode Parish Council

Matter 1 - Overall Housing Provision for Mendip

(i) In relation to the 'Additional requirement 2011-2029' for 505 dwellings, as identified in LPP1 policy CP2, to be addressed in site allocations, should these dwellings be added to the Part 1 of the Local Plan (LPP1) total of 9,635 dwellings (Core policy 2) or be subsumed within this total?

1. A careful reading of Local Plan Part 1 shows quite clearly that the total of 9,635 dwellings to be added to the District's housing stock includes the additional 505 dwellings that need to be found because of the changed end date.
2. Evidence for this includes Table 6: Summary of the exercise used to determine local housing targets. It shows numbers for Frome, Glastonbury, Street, Shepton Mallet and Wells and a Rural target. It also shows the 505 requirement created by the roll-forward exercise and is included in the total at the bottom of the table of 9,635.
3. This is further reinforced on page 40 in the table under Core Policy 2 where the 505 is clearly part of the 9,635.
4. Appendix 1 sets out the case in more detail.

(ii) Is there a 'strategic expectation', based on LPP1, for allocating 505 additional dwellings in the north-east part of the District, and if so, what is the evidence to support it?

1. This reading of LPP1 may arise from text in para 4.21 which in turn references para 4.7. Para 4.21 reads as follows:

The Review of Housing Requirements (2013) and the rolling forward of the plan period to 2029 will result in an additional requirement for 505 dwellings in the District. This will be addressed in Local Plan Part II: Site Allocations which will include a review of the Future Growth Areas identified in this plan. The Site Allocations document will also be able to take account of issues in emerging Neighbourhood Plans, updated housing delivery, revised housing market areas and housing needs identified through cross boundary working. Allocations from this roll-forward are likely to focus on sustainable locations in accordance with the Plan's overall spatial strategy as set out in Core Policy 1 and **may include land in the north/north-east of the District primarily adjacent to the towns of Radstock and Midsomer Norton in accordance with paragraph 4.7 above.**

2. My emboldening. Note the conditional "may". Para 4.7 reads:

The towns of Radstock and Midsomer Norton lie on the northern fringe of Mendip district. The main built extent of these towns lie in Bath and North East Somerset; but some built development exists within Mendip and other built and permitted development immediately abuts the administrative boundary. This Local Plan, whilst taking into account development opportunities on land abutting the towns, does not make any specific allocations for development, particularly for housing. The Council will consider making specific allocations as part of the Local Plan Part II Site Allocations to meet the development needs of Mendip which have not been specifically allocated to any particular location in this Part I Local Plan. In the event that such allocations are considered, this will be undertaken in consultation with B&NES and local communities. Any impact on infrastructure in B&NES such as education, transport or community facilities, will be addressed either through s.106 contributions or through CIL arising from new development in Mendip.

3. This para may be the key to the misunderstanding of the intentions behind LPP1. It makes clear that it might be helpful to consider allocations in the area close to Radstock and Midsomer Norton but this would be done in consultation with B&NES. They have already made clear that they do not welcome any more residential development in their area but instead are interested in employment opportunities.
4. This point has been recognised by the Inspector in his ED27 para 3 where he says he wishes to explore the issue.
5. Our interpretation is that, while it was worthy of consideration, there is no absolute requirement to find locations for extra housing in this part of Mendip.

(iii) Assuming that the additional 505 dwellings are part of the LPP1 total of 9,635, is the 'strategic expectation' for allocating these dwellings in the north- east part of the District still justified and sustainable?

1. This is largely dealt with in the response to (ii) but is reinforced by other evidence. For example, Mendip Key Diagram on page 29 of LPP1 has a box containing the following wording: "DISTRICT WIDE; An additional 505 dwellings to be allocated in the district".
2. It is clear that, subject to the considerations described in (ii) above, the objective was to distribute the additional 505 across the District. And to repeat the point, they are part of the planned total of 9,635 dwellings to be delivered by 2029.

(iv) Is the definition of the North/Northeast (which is generally paraphrased to the north-east) of the District, as set out in the map on

page 10 of the Council's document entitled *Additional 505 Dwellings – Background Paper (January 2020)*, justified?

1. This map was used in the referenced document which was Mendip's response to ED20. It was Mendip's attempt at interpreting the Inspector's reference to the North-East. It is predicated on accepting the need for finding a place for 505 extra dwellings over and above the target of 9,635 in this particular part of Mendip. But as argued under Matter 1 (i) there is no case for finding yet more dwelling locations. So the question is moot.

(v) Is there a justified and sustainable case for spreading the allocation for the additional 505 dwellings out across the entire District?

1. This appears to be another way of asking the same question as (iii). The answer is the same. The allocation should be distributed across the District according to local requirements including a review of area by area under- and over-delivery of housing developments.

Appendix 1. MDC LPP2 Housing analysis by Norton St Philip PC.

Allocation of the additional requirement for 505 dwellings in the District.

From Core Policy 1 of the LPP1 the additional requirement in the period 2011-2029 as per 4.21 of the supporting text is 505. 4.21 states '*allocations from this roll forward are likely to focus on sustainable locations in accordance with the Plan's overall spatial strategy as set out in Core Policy 1*'. The Mendip Key Diagram on Page 29 the MDC's LPP1 has a box headed '*District Wide*' and the text '*An additional 505 dwellings to be allocated in the district*'

Using the spatial strategy from Core Policy 1 the table in Core Policy 2 would distribute the additional requirement of 505 across the District as follows: -

| Settlement | LPP1 Provision | Proportionate allocation of 505 as per LPP1 CP2 | Revised Provision to include the '505' |
|----------------|----------------|---|--|
| Towns: Frome | 2300 | 126 | 2426 |
| Glastonbury | 1000 | 55 | 1055 |
| Shepton Mallet | 1300 | 71 | 1371 |
| Street | 1300 | 71 | 1371 |
| Wells | 1450 | 81 | 1531 |
| Sub total | 6050 | 404 | 7754 |
| Villages | 1780 | 101 | 1881 |
| District Wide | 505 | | |
| TOTAL | 9635 | 505 | 9635 |

With the villages split into 3 categories of Primary, Secondary and other rural areas the proportionate increase for these 3 categories is as follows:-

| Category | LPP1 Minimum | Proportionate Increase | Revised Minimum |
|--------------------|--------------|------------------------|-----------------|
| Primary Villages | 765 | 44 | 809 |
| Secondary Villages | 395 | 22 | 417 |
| Other rural areas | 620 | 35 | 655 |
| TOTAL | 1780 | 101 | 1881 |

The individual village provisions for Beckington, Rode and Norton St Philip would rise proportionately in line with the Primary Villages requirement of 765 as part of the 1780 (or 20%) total earmarked for the rural area.

For these 3 villages totals would be as follows, including the total completions + permissions approximately halfway through the plan period (i.e. as at 31/3/2018 from Submission Document SD27)

| Village | Current provision | Additional provision | Revised provision | Completions and permissions to 31/3/18 | Number over minimum | % of minimum provided |
|-------------------------------|-------------------|----------------------|-------------------|--|---------------------|-----------------------|
| Beckington | 55 | 3 | 58 | 108 | 50 | 186% |
| Rode | 65 | 4 | 69 | 79 | 10 | 115% |
| NSP | 45 | 3 | 48 | 113 | 65 | 235% |
| Remaining 13 primary villages | 600 | 34 | 634 | 634 | - | - |
| Total | 765 | 44 | 809 | 934 | | |

As can be clearly seen all of the 3 villages above have already provided well above the minimum level of requirement according to the Spatial Strategy in LPP1.

Similarly, the 5 major towns of Mendip have under provided in the same period of time.

| Town | Revised provision | Completions and permissions to 31/3/18 | Under Provision | % of minimum provided |
|----------------|-------------------|--|-----------------|-----------------------|
| Frome | 2426 | 2110 | 316 | 87% |
| Glastonbury | 1055 | 858 | 197 | 81% |
| Shepton Mallet | 1371 | 905 | 466 | 66% |
| Street | 1371 | 870 | 501 | 63% |
| Wells | 1531 | 1336 | 195 | 87% |
| Total | 7754 | 6079 | 1675 | 78% |

So it can be clearly seen that the three villages of Rode, Beckington and Norton St. Philip have already taken, and that little more than half way through the plan period, a hugely disproportionate amount of development compared to both the Mendip towns and also to the majority of other primary villages.

Neighbourhood Plans.

Paragraph 4.21 of the MDC LPP1 states '*The site allocations document will also be able to take account of issues in emerging Neighbourhood Plans*'. It is apparent that no account has been taken of the Norton St. Philip Neighbourhood Plan (NSP NP). The NSP NP has clearly defined policies concerning housing – Policy 2 (The Bell Hill Garage Development Site) and Policy 3 (Exception Sites for Local Affordable Homes). The 2 allocated sites do not conform with the NP.

The Rode Neighbourhood Plan also has clearly defined policies for Housing. Policy 1 caters for permissions given but not yet built out and Policies 2 and 3 cater for housing for older

people following a Housing Needs Analysis. Again, Mendip has paid little or no attention to the Rode NP in making the allocations proposed in the Main Modifications.

Local consultation

Paragraph 4.22 of MDC's LPP1 states *'The Council will explore opportunities to deliver above the policy minimum through the site allocations process in the Local Plan Part II, including in primary and secondary villages, informed by the testing of site options **through local consultation** and Sustainability Appraisal'*. In spite of Norton St. Philip having already accepted well above the minimum requirement, and that only half way through the plan period, **no such consultation has been carried out.**

Planning for proportionate growth

Paragraph 4.22 of MDC's LPP1 also states *'The need to plan for proportionate levels of growth in Primary and Secondary Villages will, however, remain an essential consideration in accordance with the spatial strategy set out in Core Policy 1'*. Paragraph 4.33 of MDC's LPP1 states that village housing requirements have been based on a proportionate growth equating to 15% of the existing housing stock. The level of growth already experienced in Norton St. Philip is amongst the very highest in the whole of the primary villages of Mendip and hugely more than any of the 5 Mendip towns – surely the most sustainable locations for future development.

Summary.

The allocation of any further dwellings to NSP, Rode and Beckington is therefore in contravention of Mendip's own policies in MDC LPP1 and also because: -

- These villages already have the highest proportions of growth in the whole of Mendip
- The allocations are against the policies in the relevant Neighbourhood Plans, have been made without any proper consultation, and are therefore unreasonable, illogical, and fulfil no demonstrated need in their respective local communities.
- In order to redress the balance of the disproportionate amount of housing already allocated to the 3 villages there is a strong case that any further proposed allocations should instead be distributed to those towns or villages which have under provided on the minimum allocation.

Sources

MDC LPP1
MDC LPP2 Submission Document SD27
Norton St. Philip and Rode Neighbourhood Plan

Appendix over – Detail of primary and secondary village provision

| Primary Village | 2011 population | Net additional Dwellings completed 2006-2018 | Dwellings with PP Either not started or Under construction at 1 st April 2018 | Total | LPPI Minimum | Numerical Over/(under) Provision | % over/(under) provision | Increase per 100 population |
|--------------------|-----------------|--|--|-------|--------------|----------------------------------|--------------------------|-----------------------------|
| Baltonsborough | 864 | 77 | 60 | 137 | 45 | 92 | 305% | 15.9 |
| Beckington | 983 | 71 | 37 | 108 | 55 | 53 | 196% | 10.9 |
| Butleigh | 823 | 12 | 1 | 13 | 45 | (32) | (71%) | 1.6 |
| Chewton Mendip | 585 | 4 | 2 | 6 | 15 | (9) | (60%) | 1.0 |
| Chilcompton | 2062 | 127 | 31 | 158 | 70 | 88 | 225% | 7.7 |
| Coleford | 2313 | 64 | 5 | 69 | 70 | (1) | (2%) | 2.9 |
| Crocombe | 603 | 5 | 10 | 15 | 35 | (20) | (57%) | 2.5 |
| Ditcheat | 725 | 4 | 2 | 6 | 25 | (18) | (76%) | 0.8 |
| Draycott | 1326 | 31 | 1 | 32 | 65 | (33) | (50%) | 2.4 |
| Evercreech | 2334 | 140 | 24 | 164 | 70 | 94 | 234% | 7.0 |
| Mells | 638 | 5 | 0 | 5 | 10 | (5) | (50%) | 0.7 |
| Norton St Philip | 858 | 81 | 32 | 113 | 45 | 68 | 251% | 13.1 |
| Nunney | 844 | 2 | 0 | 2 | 55 | (53) | (96%) | 0.2 |
| Rode | 1025 | 22 | 57 | 79 | 65 | 14 | 122% | 7.7 |
| Stoke St Michael | 926 | 12 | 3 | 15 | 45 | (30) | (66%) | 1.6 |
| Wesbury sub Mendip | 801 | 10 | 2 | 12 | 50 | (38) | (76%) | 1.5 |
| TOTAL | | 667 | 267 | 934 | 765 | | | |

| Secondary Village | Net additional Dwellings completed 2006-2018 | Dwellings with PP Either not started or Under construction at 1 st April 2018 | Total | LPPI Minimum | Numerical Over/(under) Provision | % over/(under) provision |
|-----------------------|--|--|-------|--------------|----------------------------------|--------------------------|
| Binegar/ Gurney Slade | 10 | 1 | 11 | 40 | (29) | (72%) |
| Coxley | 74 | 17 | 91 | 40 | 51 | 127% |
| Doultong | 4 | 1 | 5 | 15 | (10) | (66%) |
| Lydford | 4 | 18 | 22 | 25 | (3) | (12%) |
| Faulkland | 23 | 13 | 36 | 20 | 16 | 180% |
| Holcombe | 39 | 4 | 43 | 40 | 3 | 108% |
| Kilmersdon | 14 | 1 | 15 | 15 | 0 | - |
| Meare/Westhay | 78 | 21 | 99 | 40 | 59 | 247% |
| Oakhill | 47 | 2 | 49 | 40 | 9 | 122% |
| Walton | 10 | 40 | 50 | 40 | 10 | 125% |
| West Pennard | 9 | 7 | 16 | 25 | (9) | (36%) |
| Wookey | 29 | 40 | 69 | 40 | 29 | 172% |
| Wookey Hole | 15 | 1 | 16 | 15 | 1 | 107% |
| Total | 356 | 166 | 522 | 395 | | |