

South Gloucestershire Core Strategy Examination Action List

Clarification of the level of housing shortfall and explanation of how this has been taken into consideration in policy CS15.

1. At the EiP Matter Session 8 – Provision and Distribution of Housing Policy CS15, the Council agreed to prepare a technical note to confirm the level of any housing shortfall and how this is accommodated.
2. The adopted South Gloucestershire Local Plan covers the period 1996 to 2011. Annual delivery was expected to be 1,184 dwellings per annum. The shortfall that occurred up to 2006 is 1,150 dwellings. The calculation for this is shown in Appendix A. This is an amount of housing that needs to be provided for over and above the Council's housing requirement of 26,400 for the Core Strategy period 2006-2026/27.
3. The council presented evidence at Appendix A of its Matter Statement 8 that showed, based on demographic led projections, that as a “worst case” there is a need for 26,400 dwellings over the period 2006 to 2027. This position was supported by independent evidence provided by Roger Tym and Partners (Examination Library Ref RE12) who stated that that figure was 25,000 dwellings. Therefore the Council considers that the evidential case to justify its level of housing requirement contained in Policy CS15 has been adequately made not just by the Council but by other parties.
4. Any shortfall that has occurred between 2006 and 2012 is therefore already accommodated in the housing requirement for the period 2006 to 2027 contained within the Core Strategy i.e. the figure of 26,435 dwellings. The shortfall that has occurred between 2006 and 2012 is 2,117. However it is not necessary or appropriate to add this figure to the figure of 26,435 dwellings as it is already accommodated within that figure.
5. The shortfall of 1,150 arising from the South Gloucestershire Local Plan can be accommodated in the following way.
6. Based on the updated Policy CS15 which reflects the totality of housing supply in the District as at April 2012, the available housing supply is some 26,855 dwellings. This is some 420 above the figure of 26,435 dwellings. Taking this additional element of supply into account reduces the shortfall figure of 1,150 to 730.
7. In meeting the figure of 26,435 the first ten years of windfalls have been ignored. The NPPF at paragraph 48 now indicates windfalls can be included. Windfalls generated during this period are anticipated to be 1,500 dwellings. The evidence for this is contained in PSM Matter 8 paragraphs 5.1-5.4. This is well in excess of the residual shortfall of 730.

8. Finally it is the council's position that the total shortfall accrued up to 2012 should not be delivered within the first five year period of the plan, 2012/13 -2016/17. Other parties have suggested that it should and have cited examples of where this approach has been adopted. The Council understands that this approach is taken from the DCLG published research work entitled Land Supply Assessment Checks in May 2009. However this is a research and not a policy document.
9. There is in fact no policy requirement to frontload any accrued shortfall into the next five years. The research document relied upon is not policy and little weight can therefore be attached to it as means of requiring such an approach. The Council's approach in annualising the shortfall is a perfectly valid approach, the merits of which have been independently verified at the recent Williams Close appeal, Examination Library ref EB73 paragraph 36. Furthermore and in any event the amendments to Policy CS15 show that a substantial level of housing is anticipated to be delivered in the first five years of the plan.

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10th July 2012.

Appendix A Dwelling Completions Achieved

| Financial Year | Large Sites | Small Sites | Total |
|-------------------------------|-------------|-------------|--------------|
| <i>1996/97</i> | 1,089 | 98 | 1,187 |
| <i>1997/98</i> | 1,415 | 95 | 1,510 |
| <i>1998/99</i> | 1,503 | 84 | 1,587 |
| <i>1999/00</i> | 1,318 | 138 | 1,456 |
| <i>2000/01</i> | 1,168 | 84 | 1,252 |
| <i>2001/02</i> | 715 | 111 | 826 |
| <i>2002/03</i> | 796 | 146 | 942 |
| <i>2003/04</i> | 551 | 197 | 748 |
| <i>2004/05</i> | 380 | 166 | 546 |
| <i>2005/06</i> | 424 | 212 | 636 |
| Completions 1996 - 2006 | 9,359 | 1,331 | 10,690 |
| Plan requirement 1996 – 2006 | | | 11,840 |
| Shortfall 1996 to 2006 | | | 1,150 |

| | | | |
|-------------------------------|--------------|--------------|--------------|
| <i>2006/07</i> | 471 | 218 | 689 |
| <i>2007/08</i> | 657 | 346 | 1,003 |
| <i>2008/09</i> | 584 | 332 | 916 |
| <i>2009/10</i> | 475 | 267 | 742 |
| <i>2010/11</i> | 517 | 197 | 714 |
| <i>2011/12</i> | 754 | 169 | 923 |
| Completions –2006 to 2012 | 3,458 | 1,529 | 4,987 |
| Plan requirement 2006 to 2012 | | | 7,104 |
| Shortfall 2006 to 2012 | | | 2,117 |