

## **Matter 2 – Justification – The Evidence Base**

### **1. Is the evidence base sufficiently comprehensive to support the Strategy the Council has put forward and if not, what critical information is missing?**

The Council has failed to undertake a full, objective assessment of housing needs, which is a fundamental flaw in the evidence base that undermines the entire Core Strategy.

The initial evidence produced to support the housing provision proposed through the Core Strategy (Justification for the Strategy for Housing to 2026) sought to Justify at that time a housing provision of just 21,500 dwellings over the plan period. Despite the Council being sufficiently confident at this time that the evidence supporting the housing provision was robust and justified, when asked by the Inspector to review the housing requirement following the Pre-Hearing Meeting, the Council increased the housing provision and prepared additional evidence to Justify this. However, in doing so they did not undertake a full and objectively assessed calculation of housing need. Instead their evidence relied on assessments of possible migration levels in order to respectively justify a housing target that had already been determined by the sites previously identified and the addition of newly available sites. No assessment of the economic led household need has been undertaken.

In addition, the Justification papers for the housing requirement fail to take account of the fact that the Councils historic inability to meet housing requirements is a key factor in determining why migration has been lower than the 2008 based CLG household projections forecast, and further that the start of the plan period has seen one of the worst recessions in history. More detailed assessment of the housing targets that should form the basis of the Core Strategy are set out in our Appendix 1 to Matter 8.

A further weakness is evidence to demonstrate that the build rates proposed for the major sites are deliverable. Again this issue is covered in our paper on Matter 8.

Given the deficiencies in the evidence supporting the housing requirements for the plan period, this has impacted on other areas of the evidence base, specifically the Green Belt review.

Again, the 2011 Green Belt review was carried out at the request of the Inspector post submission of the Core Strategy. Although a preview version was undertaken this did not identify opportunities for areas of land to be released from the green belt. Neither Study has properly and objectively looked at the merits of releasing areas of land from the green belt in order to meet an objectively assessed housing requirement in order to provide a robust and

defensible green belt boundary that would allow the Core Strategy to provide the development it should, whilst providing a defensible green belt boundary that will not need to be changed during the plan period or beyond.