

- Matter No 3/ Initial Chapters - Tuesday 19 June 2012
 - Personal ID No: 3354113
 - Ian Jewson Planning Ltd
-

Initial Chapters including Spatial Portrait, Vision & Objectives

The following written statement has been prepared by Ian Jewson Planning Ltd (IJP) on behalf of ATA Estates (Longwell Green) LLP. It seeks to summarise the significant concerns expressed to the Council regarding both the content and the process of preparation of the Core Strategy. It is not the intention of this statement to repeat matters raised in earlier representations as oral evidence will be provided at the Examination.

Fundamentally it is considered that the plan is at odds with national guidance as it has not been '**positively prepared**' based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, nor is it:

- **Justified** – the plan is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan is not deliverable over its period; and
- **Consistent with national policy** – the plan is not consistent with the national policy including the NPPF.

Each of these matters is set out below:

Justified

The Evidence Base

In earlier submissions we have highlighted our significant concerns regarding the robustness of the Council's evidence base which underpins the Core Strategy and in particular the approach taken in relation to housing delivery and the green belt. It is clear that the Council has sought to restrict housing delivery based on the Council's suggestion that in most areas the green belt boundary should not be amended. However, the Council has prepared no detailed green belt assessment which would justify this approach. We consider that the concerns raised in relation to this during early

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stages of the plan process have not been addressed and in many respects have been heightened by the changes included within the submission draft Core Strategy.

The Council has failed to properly assess housing need in South Gloucestershire at all stages of the plan preparation process, thus undermining the entire basis of the plan. Recent changes to the plan in response to concerns raised by the Inspector do not go far enough and are not based on a proper evidence base in accordance with the requirements of paragraph 158 of the NPPF which requires that local plans are based on 'up-to-date and relevant evidence'.

The piecemeal manner in which the plan has been prepared has resulted in a plan which is at odds with the Council's overall strategic objectives. Notably, it is unclear whether LDF documents (including the Core Strategy) and the Sustainable Community Strategy will deliver an integrated approach to development. The 2008 version of the document stated at page 12 that:

*'Our Sustainable Community Strategy sets out how we will deliver the strategic aims of the **draft Regional Spatial Strategy (RSS)**, which proposes that growth in South Gloucestershire will continue at high levels up to 2026.'*

Whilst it is anticipated that RSS's will be removed from the development plan imminently the evidence base which underpins them remains a material consideration.

The current draft Core Strategy falls significantly short of delivering the level of housing envisaged by the draft RSS. Whilst the Council's September 2011 draft of the Sustainable Community Strategy steps away from meeting these targets page 6 states the aim of enabling '*...everyone living in South Gloucestershire to access a home they can afford*'. As the Council, and indeed the SHMA, remains silent on overall housing need it is unclear how this aim can be met by the draft core strategy.

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Effective

The Council's Record of Housing Delivery

The Council has an extremely poor record of delivering market and affordable housing.

As a starting point the level of delivery since 2006/07 falls considerably short of the requirement. Furthermore the proposal to provide an additional 22,340 new homes up to 2026 will be insufficient to meet future needs.

The Core Strategy is written in a manner which suggests that normal levels of growth occurred in South Gloucestershire prior to the economic downturn. In actual fact the Council has failed to meet their required level of housing growth in every year since 2001/02. Figure 3.2 of the Council's 2011 AMR provides a useful summary of this and is replicated below:

Reproduced from SGC's AMR (December 2011)

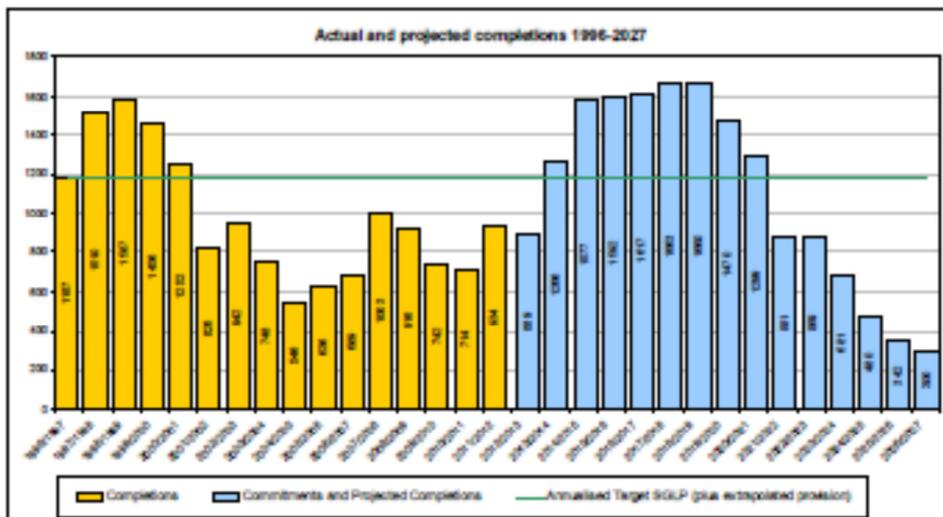


Figure 1.2

Analysis of the Council's AMR housing projections since the 2006/07 period, as illustrated by the figure below, clearly indicates that year on year the Council have suggested that short term problems of delivery will be resolved by significantly higher delivery levels in the future. This approach is wholly unrealistic and if allowed to be

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replicated in the emerging Core Strategy will significantly impact on affordability and the availability of homes for those in need.

This trend of under delivery will of course impact on the provision of affordable housing. According to earlier versions of the Core Strategy, prices have risen in South Gloucestershire compared to incomes over the last 10 years despite the housing market downturn. This has resulted in an ever increasing affordability gap with people unable to rent or buy homes on the open market. Furthermore over the period (2003-2011) South Gloucestershire faced a significant shortfall in the supply of new subsidised affordable homes. As of the 18th March 2010 there were 7,147 people on the Council's housing waiting list. The figure now stands at in excess of 10,000 and continues to grow.

The phased approach to housing delivery will in fact worsen the situation. Based on the Council's poor record of delivery there is no certainty that those dwellings delayed until later in the process will be delivered in the plan period.

The current economic downturn should not be used as an excuse to avoid planning positively or attempting to meet historic shortfalls in housing delivery. It is a fact that before the economic downturn, housing delivery still fell significantly short of their own target requirement in South Gloucestershire, even during the economic boom which preceded it.

Whilst the Vision set out at pages 23-25 of the Core Strategy seeks to identify areas for future housing growth this will not be able to deliver sufficient houses to meet historic and future requirements. It is therefore at odds with the '*other objective*' of '*providing a range of housing to meet the needs of the whole community*' as set out in part at page 27. If this objective is to be met the Council must apply a stepped change in housing delivery during early stages of the plan.

The Council's increased level of housing growth is welcomed. However, it does not go far enough, nor is it supported by robust evidence required by national policy. The Core

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Strategy incorrectly seeks to apply a phased approach to delivery which backloads the majority of housing growth towards the end of the plan period. In reality the historic undersupply of housing over the last decade has caused a significant affordability gap which must be addressed now, as the approach proposed will only exacerbate the problem.

The Council refers to three strategic housing allocations in the period up to 2016 although it is important to note that these allocations were originally allocated in the Adopted Local Plan which envisaged that 2,100 dwellings were to be completed by 2011. The vast under-supply of houses from these three sites highlights the poor record of delivery across South Gloucestershire and confirms that the desperate need for housing should be a priority. The Council's record of delivery on other Local Plan housing allocations is just as poor. It is unrealistic to expect the Council to reasonably meet future housing needs and indeed their objective of '*providing a range of housing to meet the needs of the whole community*' (para 4.1) without a concentrated period of house building in the early period of the plan both on strategic and smaller housing sites which can contribute to housing delivery.

Consistent with National Policy

The NPPF requires at paragraph 47 that the Council should:

'identify and update annually a supply of specific deliverable¹¹ sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land'

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As the Council have a record of persistent under delivery a 20% buffer should be included. Based on the Council's assessment of housing supply it seems extremely unlikely that they will meet this requirement.

In relation to housing the Council has resisted the targets identified by the draft Regional Strategy even though this has been tested through examination and taken further in the Secretary of State's Proposed Changes. While Regional housing targets have not been adopted they remain a material consideration which currently should be given considerable weight.

The most recent ONS population figures support the higher targets. Whilst the Council has set out its justification for its housing strategy the targets and phasing promoted in the Core Strategy undermine the soundness of the Plan. Restricting housing will impact on economic vitality of the region

It is clear from the Governments recent statements including Planning for Growth – 23rd March 2011 that increasing housing supply is a priority.)

In light of the above the plan is neither based on robust evidence nor justified in terms of the level of development proposed.