

**Matter 8: Housing Provision**

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- 1) The process for determining the housing requirement is set out at the first bullet point of NPPF paragraph 47 and at paragraph 159. The message of paragraph 47 is clear, that is *'to significantly boost the supply of housing'*. At the heart of the NPPF is the presumption in favour of sustainable development; paragraph 14 the NPPF makes clear that *'local planning authorities should positively seek opportunities to meet the development needs of the area.'*
  
- 2) The SMHA is now a critical document in the context of paragraph 159, as indeed is the SHLAA. The position comparing annual supply against affordable housing need based on each of the West of England four unitary authorities is provided below (an updated version of the SHMA Table 4.12):

LPA	Average annual supply 2006-2026	Average Annual Need 2009-2021	Affordable need as a % of new supply	Comparison to 2009 SHMA position
B&NES	550	847	154%	116%
Bristol	1,320*	1,526	116%	102%
North Somerset	700	904	129%	64%
South Glos	1,257	903	72%	81%

\*minimum target

- 3) The table shows that in terms of being positively prepared then the SGC strategy has at least some scope to minimise significant increases in affordable housing need over the plan period; it ought to at least prevent a worsening of the position. In the other three UA areas, the overall annual housing rate does not even match the annual affordable housing need and in those authorities, based on the evidence of the SHMA the position will reach critical levels if left unchecked. Development per se is unlikely to ever resolve housing need completely in the West of England, however, it is arguable that SGC is taking significantly more positive steps than its neighbours. Indeed, since the SHMA was published in 2009 and the advent of Localism, the annual housing requirement in each of the other three UA's has decreased (compared to an increase in SGC).
  
- 4) Purely on the basis of the Core Strategy performing more positively than its neighbours is not in itself a justification for the approach. As both Bristol City and North Somerset Inspectors have noted, there is no right answer to establishing the appropriate figure in the context of 'unprecedented economic uncertainty'. The CS must demonstrate flexibility in its approach that could enable further growth should the opportunities arise. If it is right that the requirement is only for 21,500 homes but SGC has identified a supply of 26,400 then there is a reasonable degree of in built flexibility. Moreover, the fact that windfall development can now be considered an appropriate contributor to supply in the first 15 years strengthens that position further.

- 5) The NPPF clearly establishes the context in which the development industry is able to respond to a failure to deliver and this obviously extends to sustainable sites not identified in the SHLAA and CS, and could extend to Green Belt sites; in SGC a lack of housing supply has in the past been accepted by the Secretary of State as the necessary exceptional circumstance to allow planning permission. Clearly that does not establish a context for sound development plan planning, however, the NPPF does foster an inherent flexibility in approach. Whilst it is a weakness of the SHLAA not to have fully considered the capacity of other Green Belt locations, we support the conclusions of the SA that confirms these are not reasonable alternatives that should be prioritised over those already identified.
  
- 6) We do not advocate that the CS be found unsound on the basis of an undersupply of housing. That is a 'solution' that will only result in uncertainty and not assist in the delivery of the necessary step-change and investment in the new neighbourhoods. It is important to be realistic about what can actually be delivered over the next 15 year period to 2027. Assuming at least 26,400 homes does get delivered, this undoubtedly represents a step-change and is reliant on the market improving significantly during the next five years. Whilst there has been a history of under-supply this is in part due to the majority of the major Local Plan sites S106 Agreements being renegotiated to enable development to proceed; those hurdles have been overcome and thus there is a healthy and deliverable supply going forward that suggests the build rates can be achieved (or at least worked towards). RPS has presented evidence through its representations<sup>1</sup> that demonstrates how the Harry Stoke Local Plan allocation (1,200 homes) and the East of Harry Stoke New Neighbourhood (2,000) is likely to be delivered and completed by the end of the plan period.
  
- 7) Failure to meet the necessary rates during this period will have knock on effects in the later years of the plan period. As paragraph 9.1 of the SGC Housing Paper notes, analysis of completions in the past 30 years shows that the target rate of 1,640 dwellings has only been achieved in 4 of the last 30 years. Whilst there has undoubtedly been a restriction in supply since Local Plan adoption in 2006, the rates required are equivalent to the combined peak outputs of Bradley Stoke and Emersons Green in the 1990s. There is no doubting similar rates can be achieved again but there is bound to be fluctuation and setting unrealistic goals will not assist effective delivery.
  
- 8) To overcome our concerns, we recommend an important change to the wording of Policy CS15. We are concerned about the Council's commitment in terms of the wording of "up to 26,400 homes". This is ambiguous and provides no certainty. The 'up to' reference is unhelpful as it does not assist in establishing the target as a robust one. The Council has arrived at an identified level of growth based on a wide number of factors as listed in paragraph 10.5a. That is a level of growth that is required to

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<sup>1</sup> East of Harry Stoke Statement of Delivery (February 2012)

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meet the vision and objectives of the plan; the consequences of failing to meet that target should be clearly expressed. It is not satisfactory to imply that the vision and objectives of the plan can be met if the level of growth is not achieved.

- 9) Indeed, the 'up to' statement reflects a lack of ambition that is not reflected by the NPPF or the Ministerial Statement of 23 March for planning positively for growth and responding to wider opportunities. The 'up to' remark suggests restraint; to that end, RPS recommends that 'up to' should be replaced by 'at least'. This would set the tone for a more proactive and flexible approach and ensure that there is no restriction on delivering the identified supply in the event windfalls come forward in the numbers anticipated. If this change is made, we do not propose to challenge the soundness of the CS further.