

# **South Gloucestershire Core Strategy Examination in Public**

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Day 2      Wednesday 20<sup>th</sup> June 2012

**Matter 8            Provision and Distribution of housing  
Policy CS15**

Personal ID No 2799265

Graham Parker, PJPlanning Consultants

On behalf of

**Deeley Freed Estates and Skanska Residential UK (DFSR)**

## MATTER 8 - PROVISION AND DISTRIBUTION OF HOUSING – POLICY CS15

### A *Housing Provision*

#### A1 **WOULD THE COUNCIL'S MODIFIED PLAN (DECEMBER 2011) RESULT IN A SERIOUS UNDERSUPPLY OF HOUSING?**

##### **Need**

- A1.1 It is a common, if not universal, view amongst the participants that the Post Submission Changes Core Strategy (PSC) significantly underestimates the supply of housing that will be necessary to meet the needs of South Gloucestershire for the plan period.
- A1.2 The basis for this is set out clearly in submissions on behalf of a number of other parties, for example, Roger Tym & Partners on behalf of Welbeck Strategic Land, Barton Wilmore on behalf of Barratt Developments, Pegasus on behalf of Mr and Mrs Keller.
- A1.3 Put simply, all of these parties submit that there is no objective evidence to support the number of dwellings proposed for South Gloucestershire (26,400 between 2006 – 2027 of which 4060 are already built, leaving 22,340 to be identified in the PSC).
- A1.4 Our representations to the submission Core Strategy made the point that the figure of at least 21,500 then being proposed had no basis in the evidence base and that a target up to 30,000 would be appropriate.
- A1.5 Those representations were made on the basis of the then requirements of PPS3 and, whilst the national policy background has changed since the Post-submission Changes were published and consulted on, the *principles* underlying the justification of Local Plan housing policies have not.
- A1.6 The NPPF still requires Local Plans to make provision for housing and to base that provision on the best evidence available:
- Para 7 “...providing the supply of housing required to meet the needs of present and future generations; ...”**
- Para 17 “... Every effort should be made objectively to identify and then meet the housing ... development needs of an area, and respond positively to wider opportunities for growth.”**
- “47 To boost significantly the supply of housing, local planning authorities should:**
- **Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area ...”**
- “158 Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area ...”**
- A1.7 DFSSR's position, in concert with many other respondents, remains that the PSC being considered by the Inspector does not accord with these principles.
- A1.8 It is clear that this was in the Inspector's mind when he asked the local planning authority to reconsider the justification for the Submission Core Strategy's proposal to provide for 21,500 new homes.
- A1.9 The local planning authority's response to the Inspector's request was to prepare a Supplementary Housing Paper (SHP). The SHP makes a variety of criticisms of the ONS projections and states that the Council challenges the assumptions underpinning the use of this evidence. However, rather than respond to the representations by reconsidering the need for future housing based on up to date and relevant evidence, as required by the NPPF, the SHP does not propose any evidence-based justification at all for the newly-proposed figure of 26,400.

A1.9 In the absence of an alternative assessment of housing needs, it is evident that no full, objective, assessment of the needs for market and affordable housing underpins the PSC's revised target of up to 26,400 homes to 2027.

### **Supply**

A1.10 It is also evident from paragraph 5.5 of the SHP that the basis for the local planning authority's increase is simply an improved understanding of the locational implications of development on the Green Belt, infrastructure requirements and environmental assets. Principally, this seems to have involved a reconsideration of the capacity of sites and the new neighbourhoods.

A1.11 Even then, in the case of the Cribbs Patchway New Neighbourhood (CPNN), which is the principal concern of DF SR, the revised assessment of the capacity appears to have significantly under-represented the capacity of the land that comprises the neighbourhood. For example, the December 2011 SHLAA, which is in the Core Examination library, identifies five sites that fall within the proposed neighbourhood, with a combined theoretical capacity of 5183 dwellings. These fall into two categories:

#### *1. The DF SR land*

- SHLAA site 118 1448 dwellings
- SHLAA site 126 121 dwellings

#### *2. The Ashfield/Persimmon/Redrow Land*

- SHLAA site 090 1,300 dwellings
- SHLAA site 117 2,242 dwellings
- SHLAA site 202 72 dwellings

A1.12 The Inspector will note that these estimates do not include the land released by British Aerospace at Filton Airfield which the local planning authority estimates will be able to accommodate up to 3,500 dwellings.

A1.13 DF SR acknowledges that these theoretical figures do not take account of the realities of site planning. However, they are broadly consistent with the position that has been consistently put forward in representations over many years by DF SR and by those representing Ashfield/Persimmon, namely that these five pieces of land are capable of accommodating more development than is allowed for in the PSC. Those representations had taken account of the requirements of the local planning authority for social and physical infrastructure etc and, in DF SR's experience, will be realistically achievable on the SHLAA sites 118 and 126. Furthermore, as will be set out in DF SR's response to the Inspector's Questions on Matter 22, the DF SR land is relatively constraint-free and is capable of being brought forward early in the Core Strategy period.

A1.14 Thus, DF SR's view is that the capacity of the CPNN is under-represented by a considerable amount and ought to be increased to 'up to 7,000'. We will return to this in our representations on CS26.

A1.15 The increase will largely be on the five SHLAA sites identified above and focused on the land that is relatively constraint-free and that ought, reasonably, to be capable of delivery in the first and middle phases of the Core Strategy period.

### **Conclusion**

A1.16 In the SHP, the local planning authority relies on the 'localism' provisions of government policy to the exclusion of the government's requirement - consistent through PPS3 and the NPPF - to base their policy on objective evidence of 'need'. This, in DF SR's view, renders the Core Strategy inconsistent with the NPPF and, consequently, unsound.

A1.17 DF SR continues to maintain, along with many other respondents, that the ONS/CLG projections remain the best objective evidence available. These indicate a required rate of

c1600 p.a., which indicates that the target ought to be some 29,660 homes (25,600 over the 16 years 2011/2-2026/7 + 4060 completions). ..

A1.18 Furthermore, the reflection of the realistic capacity of the CPNN (up to 7,000 dwellings) in CS15 would enable the Core Strategy to:

- More properly (although not yet fully) meet the housing needs of the District
- Meet more of those needs in what is acknowledged as one of the most sustainable locations in the district
- Meet those needs in the early part of the Core Strategy period.

**A2 HOW SIGNIFICANT ARE CURRENT ECONOMIC CIRCUMSTANCES ON THE OVERALL LEVEL OF HOUSING THAT IS FEASIBLE DURING THE PLAN PERIOD - COULD THE AMOUNT OF HOUSING PROPOSED IN EITHER THE DRAFT REGIONAL STRATEGY OR THE SECRETARY OF STATE'S PROPOSED ALTERATIONS BE DELIVERED IF TARGETS WERE INCREASED TO THESE LEVELS?**

A2.1 There is no doubt that the recent economic circumstances have had a significant impact on the delivery of housing in the past few years and may well continue to have an effect into the future.

A2.2 Having said that, South Gloucestershire has been, and aspires to become again, one of the economic successes of the region, if not the country. Given the authority's strategic position, its highly skilled workforce and its cluster of high technology businesses, it will undoubtedly achieve its desired economic success.

A2.3 The authority identifies that one of the key challenges of the Core Strategy is to 'respond to and manage the impact and pressure of new development' throughout the plan period (para 1.35). It goes further and identifies in Key Issue 3 the crucial role that housing has to play in maintaining economic prosperity:

**"...long lead in times in bringing forward the housing development and strong employment growth is threatening to undermine this restructuring."**

A2.4 In addition to aspects such as the availability of employment land, infrastructure, education provision etc, it is evident that the availability of housing in the right numbers and the right location will be a crucial element in this economic recovery, which is the key purpose of CS15.

A2.5 In DFR's view, the two key failings of CS15 are;

- 1 Insufficient housing numbers (see the answer to Question A1)
- 2 The 'backloading' of the phasing shown in the policy.

A2.6 Others have pointed out that 'backloading' the housing trajectory is, itself, a risky and unjustified strategy which does not ensure deliverability but, as we say above, the Strategy itself acknowledges that a lack of deliverable housing sites in the early years of the strategy is also likely to restrain economic recovery.

A2.7 It is not a question of the capacity of the development industry to deliver housing, since the local planning authority appears to believe that, in principle, it *is* possible to achieve the Regional Strategy levels. The draft Regional Strategy level of 30,800 would have required the provision of c1,540 dwellings p.a., which the local planning authority clearly expects to be achieved in the second and third phase of the Core Strategy period:

- In the middle phase (2016-2021), the local planning authority's target (1585 p.a.) is actually slightly higher than the RS projection.
- In the later period (2021-2027), the Core Strategy also represents a relatively high annual rate of 1483 dwellings p.a.

- A2.8 It is only in the first Core Strategy phase, 2011/12-2015/16, that the Strategy falls below these relatively high levels, promoting a rate as low as 1110 dwellings per annum. Taking into account the under-provision during the previous 5 years, this will undoubtedly compound the pre-existing (and acknowledged) shortage of housing in South Gloucestershire. It is even more of a concern given that the other three authorities in the SHMA also intend to under-provide, so that it cannot be assumed or hoped that any underperformance in South Gloucestershire, will be taken up by the other authorities.
- A2.9 Thus, DF SR's submission is that the failure to prepare a Core Strategy housing policy that can accommodate the needs of an economic upturn means that it is more likely that this housing policy will harm economic growth, rather than economic circumstances harming housing provision.
- A2.10 DF SR, therefore, submits that the level of c30,000 dwellings proposed in the Regional Strategy is supportable, entirely achievable and indeed, necessary for the prosperous growth of South Gloucestershire.

**A3 Is the phasing of housing realistic and deliverable?**

- A3.1 It will be evident from the previous answers that DF SR believes that the number of dwellings in CS15 should be increased to c30,000 and that the phasing should be adjusted by accommodating more dwellings in the first phase to achieve the Regional Strategy level of provision and the previous under-provision.
- A3.2 DF SR submits that a considerable amount of this early increase can be accommodated in the CPNN as there are areas of land, referred to in our answer to Question 1, that do not require large upfront infrastructure works or funding to enable development.

**A4 Should the Council provide an additional 5% or 20% in excess of a 5 year housing land supply as required by the Planning Framework?**

- A4.1 The 2011 Annual Monitoring Report (AMR) claims that, with an identified supply of 6941 dwellings, the local planning authority has 4.96 years supply of deliverable sites.
- A4.2 Setting aside the details of the 5-year calculation, which is decidedly challengeable, in Figure 1.2 of the AMR it demonstrates that housing delivery has fallen below its target every year from 2001-2.
- A4.3 DF SR submits that given this situation, there can be no doubt that the Council should aim to provide an additional 20%.

**A5 Is there information to show windfalls should be taken into account as a valid source of housing land supply?**

- A5.1 This is not an aspect that DF SR has studied in detail and we will not offer a comment.

**B Housing Distribution**

**B1 Is the distribution of housing proposed in the CS consistent with sustainable development objectives?**

- B1.1 The location of the North Fringe New Neighbourhoods on land well related to the main urban area, close to existing and proposed employment, existing and proposed retail, recreational and social facilities and to existing and proposed infrastructure represents a sustainable approach to development that DF SR has promoted in South Gloucestershire for some 16 years.

**B.2 Is the level of allocation in each of the main locations broadly appropriate having regard to the character of these places?**

- B2.1 We have commented above that we believe that the size of allocation in the CPNN under-represents the potential and reasonable capacity of the land and we suggest that this allocation should be increased to 'up to 7,000'.

B2.1 Furthermore, we submit that an additional 600 of this should be incorporated in the first phase (2011/12-2015/16) in order to represent the deliverability of much of the land in the CPNN.

**B3 Is there evidence to support opportunities for alternative/additional housing provision in other parts of South Gloucestershire?**

B3.1 There is, as we have said above, evidence that additional dwellings need to be allocated.

B3.2 There is also evidence that some of this additional provision can be catered for on land that has already been identified in the emerging Core Strategy, particularly in the CPNN.

B3.2 However, this will in DFSA's opinion, still be insufficient to accommodate the need for additional housing, particularly in the crucial first phase. Additional sites will undoubtedly be required.

B3.4 These should be located in sustainable locations, first of all, close to the main Bristol urban area well related to employment and social etc facilities and where they can take advantage of public and non-car-based modes of transport. Whilst the protection of the Green Belt is a major consideration, in DFSA's submission it should not prevent the most sustainable location of development being achieved. Indeed, the NPPF specifically points out (as did PPG2 before it) that **"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development."**

B3.5 If sufficient land cannot be identified close to the main urban area, then in accordance with paragraph 84 of the NPPF, development should be located adjacent to the other main towns and villages and designed so as to support and enhance their sustainability and vitality.

**B4 Is there enough flexibility in the CS to allow for alternative sites to come forward?**

B4.1 No.

B4.2 First, we do not believe that sufficient land has been allocated.

B4.3 Second, whilst some of the land (including the DFSA land) that makes up the new neighbourhoods is relatively constraint free and can be brought forward without the need for major infrastructure, it is evident that some of the land identified, both in the CPNN and the Neighbourhood East of Harry Stoke *is* contingent on the delivery of major new strategic infrastructure. This needs to be reviewed as part of the deliverability discussion and the phasing approach.

B4.4 If some of the New Neighbourhood land does not come forward as quickly as anticipated in the draft Core Strategy, then it will be necessary to have alternative sites 'primed' to take its place. It is not evident from the Core Strategy as it stands where this is to come from.