

SOUTH GLOUCESTERSHIRE CORE STRATEGY DPD EXAMINATION

MATTER 8 - PROVISION AND DISTRIBUTION OF HOUSING - POLICY CS15

WEDNESDAY, 20TH JUNE 2012

HERON LAND DEVELOPMENTS LIMITED

ID 2880673

HOUSING PROVISION

1. *Would the Council's modified plan (December 2011) result in a serious under-supply of housing.*

1.1 The Government is committed to increasing the supply of housing. Para. 47 of the NPPF requires Local Authorities to:

".....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, as far as is consistent with the policies set out in this framework".

1.2 Para. 6 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and paras. 7 - 10 address the need for this to be based on integrated approach to economic, social and environmental considerations. Thus the approach to this issue involves a prima facie obligation on the Local Authority to identify in full the needs for market and affordable housing, and then to establish a strategy that will meet those to the extent that it is compatible to do so having regard to a balance of economic, social and environmental considerations.

1.3 Heron Land Developments has not submitted a specific objection in relation to the overall level of housing provision, but expressed concern at Pre-Submission stage that the level proposed fell some way short of the Government's household projections. To that extent we welcome the Council's decision to increase overall housing provision, which is achieved fundamentally by the new strategy for Filton Airfield.

1.4 We remain concerned however that this scale of increase appears insufficient to meet future requirements derived by demographic analysis. Thus, in line with the approach set out in para 1.2 above pursuant to the NPPF, the robustness of the strategy depends on the legitimacy of the factors outlined in para. 10.5 (a) (Post-Submission Changes December 2011).

2 *How significant are current economic circumstances on the overall level of housing that is feasible during the plan period*

No comments.

3 *Is the phasing of housing realistic and deliverable.*

3.1 Our response to this question relates principally to that part of Policy CS15 concerning the New Neighbourhood at Yate. Policy CS15 (as proposed to be amended) anticipates 2,700 completions at the New Neighbourhood by 2027 of which 810 will be completed in the five years 2016 - 2021 and 1,890 in the period 2021- 2027. This represents an average annual build rate of 162 dpa in the first five years and 315 dpa in the period 2021 - 2027.

3.2 Heron Land Developments does not consider this to be an appropriate phasing for a number of reasons. These are summarised as follows:

- the first housing completions are envisaged in 2015, not 2016;
- average annual completions over the life of the development are expected to be approx. 250 dpa, assuming 35% affordable housing and 65% market sales. (Thus the average required rate of market sales is 162 dpa);
- the overall trajectory for the scheme indicates final completion of 3,000 dwellings in 2027.

3.3 More detailed information in this respect is set out in the Design & Access Statement developed for Heron's outline planning application. Assuming the a grant of outline planning permission in 2013, it is envisaged that development on the Heron land will be completed in 2025. Access to the third party parcels in the north-west of the site, having a total capacity of 339 units, will come forward from

2025. It is assumed that the Barratt Developments scheme (250 dwellings) will be delivered in parallel with the Heron scheme.

- 3.4 The project would support at least three house sales outlets at any one time. They would each be expected to achieve at least 55 private unit sales per annum. Assuming affordable housing provision at 35%, this equates to at least 250 dpa on average.
- 3.5 Thus Heron consider that Policy CS15 should allow for the full 3,000 dwellings at the North Yate New Neighbourhood to be provided for in the Plan period.
- 3.6 There is no need or justification for phasing the development in planning policy terms and the phasing bands are not required to satisfy the tests of soundness. The only consideration relates to the delivery of foul sewerage infrastructure above 500 dwellings. This is not a constraint in light of the agreement reached between Heron and Wessex Water (see Foul Drainage Statement accompanying Heron's planning application) but in any event is not directly reflected in the phasing bands selected.
- 3.7 Indeed it is understood that the Council does not seek to restrict the flow of development once approved and are prepared to accept that they will not be used as a device to constrain the flow of development. Indeed, to do so would threaten the ability to progress the development in line with market demand and infrastructure requirements in a co-ordinated manner.
- 3.8 We therefore propose that the phasing bands are omitted. In addition (see our Representations regarding Post Submission Changes, December 2011 (PSC 81 – 83) the second and third sentences of para. 10.6 (a) should be deleted.
- 3.9 If this submission is not accepted and the phasing bands are to be retained, amendments are needed to address the following points:
- The figures shown should reflect an even rate of development from 2015 – 2027 (12 years); and (adopting the text of the Post-Submission Changes, December 2011 (PSC 81 – 83)):
 - The first sentence of para. 10.6 (a) should be amended to read:

"this new housing is expected to be delivered broadly in accordance with the phasing set out in Policy CS15, however it is not the Council's intention to artificially constrain the rate of delivery of any of the individual developments identified."

- The second sentence of para. 10.6 (a) should be amended to read "***rather, the purpose of this is[continue as drafted]***" and the third sentence should be deleted;
- The last two sentences of para. 10.7 (a) should be deleted and replaced by a new paragraph to follow para. 10.7 (b) reading as follows:

"If as a result of monitoring, it is clear that insufficient progress is being made with the identified components of housing supply to ensure delivery of required overall provision, the Council will undertake an early review of the Core Strategy no later than 2016 to respond to this change in circumstance. Such a review will also be necessitated should BAE Systems decide against releasing Filton Airfield for the development proposed."

4 *Should the Council provide an additional 5% or 20% in excess of a five year housing land supply as required by the planning framework.*

4.1 No comments.

HOUSING DISTRIBUTION

1 *Is the distribution of housing proposed in the CS consistent with sustainable development objectives.*

1.1 Our written comments on this matter reflect our position in relation to Matter 7 (Q1 & 2).

1.2 Para. 7 of the NPPF identifies three dimensions to sustainable development: - economic, social and environmental. Paras. 8 to 10 note that the three roles are mutually dependent and should be sought jointly and simultaneously through the planning system. They should lead to positive improvements in people's quality of life, including easier access to jobs, net gains in biodiversity, better design,

improved conditions in which to live, work, travel and take leisure, and widening housing choice. Local circumstances should be taken into account.

1.3 Policy CS5 provides a coherent Spatial Strategy for South Gloucestershire with bespoke components for different communities according to their local characteristics. The principles set out are carried through in subsequent locationally specific policies. In each case consideration is given to economic, social and environmental aspects and to their integration to deliver sustainable outcomes in fulfilment of the respective vision statements.

1.4 One of the core planning principles set out in para. 17 of the NPPF is that:

"Planning shouldtake account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it."

1.5 Whilst the Core Strategy was prepared in advance of the NPPF, Policy CS5 reflects this approach. It is based on high level planning principles facilitating more detailed strategies in subsequent policies, including in terms of the scale and type of development to be provided. Unless it can be demonstrated that some key element in the current spatial structure of the District has been omitted from this policy, it is not considered that any other approach to housing distribution would be appropriate.

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

2.1 Our written comments on this matter reflect our position in relation to Matter 7 (Q3).

2.2 Policy CS15 sets out the scale and distribution of new housing in the District. The scale of development proposed is broadly consistent with the Spatial Strategy, including in particular a concentration of the majority of new housing within the Greater Bristol area. The second largest component of housing is provided at Yate and Chipping Sodbury. The following comments focus on this element of the strategy.

2.3 With a population of 35,000, Yate & Chipping Sodbury is the fourth largest contiguous urban area in the West of England (after Bristol, Bath and Weston Super Mare). Historically the community has demonstrated (and continues to demonstrate) a strong locally-generated demand for housing and a relatively younger age profile than the District as a whole, with a particular focus on the prime household-generating age groups. Empirical evidence derived from a Household Survey in 2010 (RD27) has re-affirmed these characteristics, including a high degree of satisfaction among residents with the town and a strong propensity for potential purchasers to remain in the town when they move.

2.4 The scale of housing proposed at Yate & Chipping Sodbury is well within the ability of the local housing market and will make a significant contribution to meeting affordable housing needs.

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

3.1 No comments.

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

4.1 No comments.

***Boyer Planning Limited
May 2012***