

- Matter No 8 / Provision & Distribution of Housing - 20 June 12
 - Personal ID No: 3354113
 - Ian Jewson Planning Ltd
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8 –Provision and Distribution of Housing

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

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 based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan is at odds with National Policy including the NPPF.

Justified, Effective and Consistent with National Policy

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 the provision of housing. We consider that these concerns have not been addressed.

Policy CS15 makes provision for up to 26,400 dwellings up to 2027. It is not clear how the Council have calculated the new requirement or indeed what they consider to be the under-supply which must be carried forward from the time-expired local plan. However, it is noted that 7,385 units will be from 'existing local plan sites'. The majority of the units allocated by the local plan should have been delivered by 2011. For this reason alone

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they are required now to meet historic need and address the growing affordability gap in South Gloucestershire, hence it is unrealistic to phase the delivery of these units across the entire plan period.

The table includes a substantial amount of dwellings from *'potential housing sites, including infill development'*. It is unclear how the Council has arrived at these figures although it would appear that these are in part made up of windfall sites.

The Council appears to have substantially increased the number of dwellings to be delivered in the Cribbs/Patchway New Neighbourhood. The increase of almost 4,000 dwellings at this late stage of the process appears to have been a reaction to comments made by the Inspector following the pre-examination hearing rather than through robust assessment of housing need. In this respect there are significant concerns regarding the deliverability of these dwellings within the timescales envisaged in the plan. Indeed the footnote at the end of Policy CS15 recognises that its delivery is contingent on major new infrastructure. There is no guarantee that support will be available from delivery partners and as such there is a considerable risk that development of this site will be significantly delayed. Furthermore, the Council does not appear to have included any flexibility within the plan to address this potential risk. Paragraph 14 of the NPPF advises that:

'Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change'

This significant change in the Core Strategy has not been properly assessed. The Council's SHMA remains silent on housing need. This is contrary to the advice contained within the NPPF at paragraph 159 which states:

'Local planning authorities should have a clear understanding of housing requirements in their area. They should:

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- *prepare a Strategic Housing Market Assessment to assess their full housing requirements, working with neighbouring authorities where housing market areas cross administrative boundaries.'*

However, all available evidence would suggest that the level of need far exceeds the amount of houses proposed by South Gloucestershire. Whilst the Council's 'last minute' attempts to increase delivery over the plan period are welcomed it is clearly not based on any robust evidence of need. Furthermore the plan is not based on a convincing strategy for infrastructure delivery.

The proposed new housing has been phased in a manner which allows lower levels of growth in the early stages of the plan. Whilst this would mean that the Council appears to be able to demonstrate a 5 year supply of deliverable sites as required by the NPPF, this approach fails to reflect the substantial undersupply which exists already and will simply exacerbate the housing problem in South Gloucestershire. The strategy should be amended to take decisive steps to meet existing housing need by firstly addressing the previous undersupply as soon as possible; and certainly within the first 5 years of the plan.

The phasing of delivery across the plan period should take into account a number of factors including:

- The need to address historic undersupply urgently
- Potential delays in the delivery of strategic housing sites
- Avoiding over optimistic density assumptions
- National guidance requiring Council's to deliver a 5 year supply of deliverable housing sites plus 20%

The phasing of housing delivery should be amended to reflect these factors and include sufficient flexibility to address potential shortfalls in the plan period.

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