

1. Overall housing requirement

1.1 It is clear from the evidence presented to the Inquiry and from the Inspector's assessment of that evidence that the Council has failed to objectively assess housing needs and to meet those needs with sufficient flexibility to adapt to rapid change, as required by NPPF paragraphs 14 and 182. The Core Strategy is not sound, even with the additional allocation identified by the Council and assuming that all sources of housing land supply, including submitted allocations, windfalls and increased capacity/delivery rates, deliver as hoped by the Council within the plan period.

1.2 The local plan remains an inadequate and poor response to the Government's priority to boost the supply of housing land. This priority has again been the subject of ministerial statements, since the examination sat and since comments were invited on the Inspector's preliminary findings.

1.3 On 10th January this year Nick Boles the Planning Minister made a statement highlighting the "*decades-long failure to build enough houses*" and identifying the "*root cause of this as a decades-long refusal to release enough land for development*". In the same statement he goes on to acknowledge short term problems, including problems relating to the credit crunch but restates "*in the long term, the original source of our housing crisis is the failure of past governments to provide enough land for development.*" and "*As planning minister, it is my job to persuade local authorities to make more land available so that more homes can be built and the price of new homes comes down – and thereby reverse the trend that has been heading in the wrong direction for decades.*" After several pages of highlighting serious housing shortage issues the Minister states:

"The National Planning Policy Framework spells it out very clearly. As they draw up their local plans, councils must assess their local housing need in an objective way. And they must identify immediately developable sites sufficient to supply all of the new homes that are needed over the next 5 years.

Many councils are embracing this duty with energy and imagination. But some are dragging their feet. And a few are looking for ways to evade their responsibilities – or slough them off onto their neighbours because the politics of house-building is too difficult. That is not acceptable. Councils which do not produce credible plans to meet local housing need will find that the presumption in favour of sustainable development will trump local decisions. And they will have to explain to local residents why their failure to produce a robust local plan exposed their communities to speculative development in places where it is not welcome. I will not defend and the Government will not support those local councils who abdicate their responsibility to meet their fair share of our common housing needs."

1.4 The message is very clear and we fully support the position put forward by Barton Willmore in respect of the overall requirements and the need to increase further overall provision, both to meet immediate and longer-term requirements but also to introduce necessary flexibility, which is required but does not currently exist.

2. Availability of additional dwellings (as identified by the Council)

- 2.1 The NPPF does not include economic conditions as a good reason to fail to meet objectively assessed requirements. Instead, it looks to flexibility to increase and boost supply. This flexibility can only be introduced by the allocation of an increased number of housing sites, including maximizing opportunities for the safeguarding of land from the Green Belt so that the council can rapidly respond to changing circumstances.
- 2.2 Further, we do not accept that the Council's additional sources of supply are fully deliverable within the plan period, particularly where those sources rely on increase building rates within the new neighbourhoods. In this respect we would draw the Inspector's attention to our evidence to matter 7 of the examination.

3. Merits of Alternatives

- 3.1 There is a clear need to allocate additional sites, both to meet 5-year supply requirements but also to introduce sufficient flexibility to maintain that level of supply throughout the plan period, in order to meet ongoing needs.
- 3.2 The Inspector's note refers to opportunities at the East Fringe. To date the East Fringe (Warmely) proposal has been progressed as a strategic opportunity, involving the release of land from the Green Belt and an appropriate re-definition of the Green Belt boundary, the latter to be associated with strong natural landscape features (i.e. the ridge line). With this in mind, we have had regard to paragraph 14 of the NPPF and the requirement during plan making that:

"Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- specific policies in this Framework indicate development should be restricted.⁹"*

- 3.3 Footnote 9 references Green Belt. It has been our position therefore that the significant benefits to be derived by the comprehensive scheme (including the social benefits of providing housing, the economic benefits of construction and the environmental benefits of improved public transport, self containment and access to public open space) weigh the balance demonstrably in favour of development over the harm resulting from the de-designation of Green Belt land.
- 3.4 With our representations to matter 27 we submitted a number of appendices, including an illustrative master plan and vision statement as well as information on transportation matters. The master plan identifies clear opportunities for a phased development, possibly with some potential for early delivery within the 5-year period. However, as our position statement on matter 7 indicates, significant delivery from this strategic site within the 5 year period will be limited

given the time required from now to undertake EIA, public consultation, submit a planning application and then reserve matters and discharge pre-commencement conditions. We therefore accept that, in reality, it will be difficult at this stage to allocate a strategic Green Belt site for development. Other sites will be needed to address the immediate 5-year supply shortfall.

- 3.5 Notwithstanding this position, there is considerable merit in identifying the potential of the Warmley site now, in the Inspector's report. This can be done by giving the council an unequivocal message to undertake early and comprehensive Green Belt review, to positively plan and find solutions to unlock this important strategic site which would, undoubtedly, help meet objectively assessed needs over the medium – longer term plan period, which the submitted plan under-provides for. Without further and early Green Belt review these needs will not be met.
- 3.6 The acknowledged requirement for Green Belt review prior to the 10 – 15 year period (i.e. prior to 2016/17) needs to be made explicit in the adopted Core Strategy document. This will ensure that sufficient flexibility is introduced into the Core Strategy so that the current position on 5 year land supply is not an ongoing characteristic of poor performance in South Gloucestershire leading to speculative development as referenced by the Planning Minister.