

From Mrs M. E. Lanfear.

F.A.O Mr P. Crysell – South Gloucestershire Council – Core Strategy Planning Inspector.

Dear Mr. Crysell.

Re: the above.

Further to my previous submission and letters, I wish to make the following comments on the Council's 7th June 2013 letter and their Consultant's opinion report.

I understand that at a meeting in June 2011 you informed the Council that you would allow them a further six months of re-drafting work to allow the plan to be found sound. It appears that two years on the council is still trying to justify its position. I do not believe that South Gloucestershire Council should be able to submit further evidence after the closure of the Examination in Public, surely other interested parties must be given the opportunity to publicly cross examination and/or issue a rebuttal of the Council's expert witness on his "opinion"; as it is only opinion not fact. No doubt other interested planning consultancies will be able to produce their own reports giving a different figure of the available land supply for you to consider.

I believe the Engine Common Appeal decision given by Mr. Neil Pope in his decision letter was a "water shed event" for the Council when they suddenly realised that they could not demonstrate they had any where near a 5 year land supply.

At the Morton Way Appeal Hearing the Council's expert witness would not discuss the 5 year land supply or enter into a technical discussion with the other party's Barrister to enable Mr. Pope (the same inspector at the Engine Common Hearing) to decide or form an opinion on the extent of the undersupply. In fact I do not understand why this expert witness attended the inquiry and then had the cheek to ask for costs. The most damning conclusion I can draw from this state of affairs is they simply didn't know, and the 7th June report submitted to you by the Council's expert witness would appear to confirm this. I believe this report does not provide you with the "full picture" on the 5 year land supply, much of it based on opinion and not factual evidence. I believe the Council does NOT have a 5 year land supply and that is why the non compliant land supply disclosure was delayed until after the public examination was closed. Through out the examination process the Council has been saying both in the spoken and written form that they can demonstrate there is an adequate supply of land to meet the next five years requirement all as necessary for the Core Strategy to be found sound, under paragraphs 47 and 182 of the NPPF. This statement has been found desperately wanting

at two public planning appeal enquiries. There has been no change since these appeal hearings except the additional 300 Morton Way houses, in fact there is most likely more completion slippage to record.

I am also very unhappy with the words used by the Council to you in their letter dated 7th June "the Core Strategy to be found sound, under paragraphs 47 and 182 of the NPPF at **least at the time your final report is produced**", clearly they wish to pre-empt your thoughts as to whether the "Sedgefield" or "Liverpool" housing calculation methods should be used in your final report. I further believe you are being persuaded into accepting the "Liverpool Housing Calculation Method" when the Sedgefield method is more in "kilter" with Government Policy to "kick start" the economy.

I will leave it to others to provide you with the detailed historical evidence on South Gloucestershire Council's housing completion numbers, but rest assured there has never been much emphasis placed on adherence to local plan completion targets with any slippage just being lost in the reporting system, this was being driven by an overly controlling political party in not wanting to see the development of the area. You may have noticed this mind set when you have been taking evidence. I believe this in part continues on.

I hope the above helps you arrive at the right decision which is to find the plan unsound.

Yours Sincerely

Mrs M. E. Lanfear.