

**South Gloucestershire Core Strategy
South Gloucestershire Council – 5 Year Housing Land Supply (SGC letter to the
Inspector dated 7th June 2013)**

**Representations on behalf of Strategic Land Partnerships
Respondent Number: 4020257
July 2013**

Introduction

These representations respond to the Council's published position on 5 year housing land supply, including the AMR update and BNP Paribas Assessment of deliverable sites. They are submitted on behalf of Strategic Land Partnerships (SLP), specifically in relation to their land interests at Bristol Road, Hambrook which is included in the Harry Stoke new community, provides an access for that planned community, but is not under the control of Crest.

Before commenting on the evidence presented by the Council we make the following comments in respect of the Council's covering letter:

- We concur with the view that a 5 year housing land supply is required in order to conclude that the plan is sound.
- Whilst the Inspector may have been minded to find the overall provision of 28,355 dwellings sound twelve months ago, further significant evidence has been submitted to the examination process subsequently which must be taken into account – we remain of the view that the Council has not identified or met the objective assessment of need (including need across all tenures and demand – NPPF para 159) with sufficient flexibility and has absolutely no evidence of overriding harm that would otherwise mitigate against meeting that need, certainly there is no robust evidence in the SA.
- Also, as time has moved on since the publication of the interim findings both appeal decisions and local plan examination reports have given increased weight to the use of the Sedgefield approach in addressing housing land supply shortfall – including most recently, in respect of the Glebelands (Essex) decision (26 June 2013) (APP/M1520/A/12/2177157), the Secretary of State agreeing to the use of the Sedgefield approach. In the Glebelands case, the SoS, at paragraph 20 of his decision letter, explicitly agrees with the Inspector's analysis of housing land supply "at IR297 – 334", including paragraph IR317 "*I can therefore see no proper reason why the whole of the backlog should not be added to the 5-year requirement, following the so-called 'Sedgefield' method*".
- The BNP Paribas report is not an independent report, it was commissioned by the Council under the clear instruction that the Council wished to use the report to justify its position on 5 year supply. The 'expression of interest' letter dated 29th April 2013 (Appendix JTRC 1) makes it clear that the report, as it progressed, was to be reviewed by officers. The conclusions (paragraph 8.5) clarify that the opinions are based on Tim Cann's analysis of the planning situation for key sites, yet that 'planning situation' can only have been described by officers because no involvement was

sought with the development industry active in South Gloucestershire.

- Given that PNB Paribas confirmed that they had no conflict of interest in preparing the report, we question the Council's comments that PNB Paribas has "*detailed knowledge of both the national and more specifically the South Gloucestershire housing market*". Indeed, the comment is unsupported by the statement of 'experience and qualifications'.
- The benefit that the Engine Common Inspector had was to listen to cross examination of both the Council and representative of the development industry in coming to his conclusion on housing land supply, rather than a sole report commissioned by the Council and influenced only by planning officers with no input from the development industry or promoters of sites in terms of market conditions, timescales or deliverability issues.

Critique of the BNP Paribas Report

Peter Brett Associates has submitted a detailed critique of the report to you on behalf of my client, the contents of which I fully concur with and so do not repeat here. However, we do take this opportunity to additionally note the following:

- It would only take the adoption of the Sedgefield approach and/or one year's delay in the progression of any two or three of the 12 strategic/larger sites relied upon by the Council to substantially affect the housing land supply such that a significant shortfall is created using the Council's own trajectory. Such a delay, on the balance of probabilities (ref to NPPF footnote 11 "*realistic prospect*"), is more likely rather than unlikely and highlights the vulnerability and inflexibility inherent in the Council's approach
- Unlike the Engine Common situation, the BNP Paribas report only provides a market view and does not test the planning and infrastructure assumptions influencing delivery of the strategic sites, instead relying solely on officer advice/interpretation in respect of planning status. This interpretation was criticised by the Inspector in respect of the Engine Common decision – a criticism not considered or reflected by the BNP Paribas report.
- The BNP Paribas report makes a number of assumptions about expectations for outlets without any supporting evidence from the development industry itself.

Conclusion

Having considered the evidence now presented by the Council, it remains our position that a significant housing land supply shortfall remains within the plan, a position that is likely to be quickly and easily uncovered through cross examination at Inquiry. Finding this plan sound on the basis of the current evidence is open to challenge and will not guard against 'ad hoc' applications.