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Dear Sir

Representations to Additional 5 Year Housing Land Supply Evidence

On behalf of our client, Redrow Homes South West, we write in response to the publication of additional evidence relating to South Gloucestershire's 5 year housing land supply and specifically the Council's letter (7 June 2013) and BNP Paribas' Assessment of Deliverable Housing Supply.

We are concerned that the Council is over-estimating housing land supply and thus additional sites are required to meet housing needs. We provide some brief commentary on these issues.

Use of the 'Liverpool' Approach

Within its letter, the Council states that it is agreed that the approach to be taken when dealing with the historic shortfall in housing delivery is the 'Liverpool' approach – i.e. spreading the shortfall throughout the plan period.

We disagree with this approach and would recommend that the 'Sedgefield' approach is adopted i.e. any shortfall in the delivery of homes from the beginning of the plan period to the current date, should be added to the total for the next five years.

The 'Sedgefield' approach is far more in line with the spirit of the NPPF to boost significantly the supply of housing (Para 47) and address any under-provision as quickly as possible. The 'Liverpool' approach does not sit comfortably with current national planning policy guidance and in our view this should not be used to calculate housing supply where there is significant under-provision.

Implications of the 'Sedgefield' Approach

If the 'Sedgefield' approach is adopted, the 5 year land supply drops from 5.4 years to just 4.4 years when considering against a 20% buffer, which in our view should be applied as the Council has a record of persistent under delivery of housing. These calculations are summarised as follows:

Assessment of 5 Year Supply - Sedgefield Approach		20% Buffer
Net provision required	28,355	
Annual Requirement	1,350	1,620
5 Year Requirement	6,751	8,101
Housing Delivery (2006-2013)	5,810	
Housing Delivery Shortfall (2006-2013)	3,642	
5 Year Requirement (2013-2018)	10,393	11,743
Total identifield Deliverable Supply	10,393	10,393
Housing Supply in Years	**5.0**	**4.4**

Windfall Allowance

It is noted that BNP Paribas includes an allowance for large windfall sites over 10 dwellings within the supply figures. Indeed, over the next 5 years, 400 dwellings (270 assumed and 130 known sites which have gained permission since March 2013) are projected to come forward from these large windfall sites.

The NPPF (Para 48) states that LPAs may make allowance for windfall sites within the 5 year supply *"if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply"*.

Appendix JTRC VIII of the BNP report provides a very brief summary of windfall site delivery between 2006 and 2013, claiming an average delivery rate of 200 dwellings per annum from large windfall sites. However, without a detailed breakdown, it is impossible to comment on how BNP has reached this figure or whether it is likely this supply will continue.

We therefore do not accept that compelling evidence has been presented to enable us to accept the inclusion of this extent of windfall sites within the 5 year supply.

Review of the Amended Trajectory

The Council's updated housing completions trajectory provides estimated delivery rates for sites with planning permission, sites awaiting completion of a S106 and sites currently progressing through the development management process.

It is not our intention to provide a detailed review of proposed housing delivery on a site by site basis. Instead, we make the following broad observations:

1 The trajectory implies that 24% of the 5 year supply will come from sites still subject to S106, 4% from sites going through the development management process, 10% from windfall sites without permission and 62% from sites with planning permission.

2 From the trajectory, the Council is assuming that 90% (610 out of a possible 678) of small windfall sites (not started) will be delivered within the 5 year period. Without access to historical information on small site delivery, it is difficult to comment on the likelihood of this but we would recommend that more information is required.

3 In total, the trajectory implies that 1,020 of the proposed dwellings within the 5 year supply (17.6%) will come from windfall sites. In our view the Council is over-reliant on the delivery of

windfalls. As a maximum, the windfall allowance for sites without permission should be reduced to 150 per annum for both large and small windfall sites (consistent with the Inspector's Main Modifications (October 2012 – Appendix D) – this would decrease the number of windfalls within the trajectory by 270 units.

4 In terms of delivery rates, we note that 5 sites that do not currently have planning permission are expected to deliver 391 dwellings by April 2014 and a further 120 dwellings from windfall sites (as currently unpermitted). We would estimate that even on the most straightforward of sites, it would usually take 6 months from a start on site to complete the first dwelling. It is therefore considered that a number of these projections are optimistic.

5 Tables 3 and 4 within BNP Appendix JTRC III, indicates that on average, a single outlet in South Gloucestershire will achieve 57 completions per annum – with larger schemes delivering on average 84 dwellings per annum. Whilst this is high (with the national average being 35/outlet/annum), we accept that given its proximity to Bristol, 57/outlet/year is a reasonable average for this LPA. We also note in the period 2006-2013 that sites delivering over 50 dwellings included on the trajectory achieved completions of on average 50 dwellings per annum.

6 We note that 7 of the key sites are expected to deliver an average of 181 dwellings per annum within the first 5 years. Whilst some of these sites will have several outlets, this is assumed rather than confirmed for some of the sites i.e. 0135 – East of Harry Stoke. We note that between 2006 and 2013, only 3 sites delivered over 100 dwellings in any one year, with their average rate of delivery being just 82 dwellings per annum. On this basis, where high delivery rates are anticipated, we recommend that this supported by evidence and not assumptions.

Conclusions

We consider that the Council is over-stating its 5 year land supply and we anticipate that the Council has a 4.4 year supply at best, whilst still allowing for some windfall site delivery despite the fact that we consider that compelling evidence has not been provided.

However, as discussed, we also consider that the delivery rates proposed on some of the sites with planning permission are too high and would recommend additional information is requested from the local planning authority to provide evidence for any site which is predicted to deliver well in excess of the 57 dwellings per outlet average per year.

Given the changes in national policy since the start of the Core Strategy Examination and the government's acceptance that house building is a key tool for kick-starting economic growth, we consider that the Sedgefield approach to assessing housing supply is more appropriate but appreciate that you have expressed some views on this issue already.

It is clear that additional housing sites capable of short to medium term delivery must be identified in order to meet housing needs given the significant under delivery of housing in recent years. Such sites should be identified through subsequent DPD's following the adoption of the Core Strategy.

Yours faithfully

[redacted]

Andy Cockett
Senior Associate Director

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Gareth Williams - NLP