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Mr Crysell  
C/O Kath Thorne, Programme Officer  
South Gloucestershire Council  
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South Gloucestershire  
(Submitted via email: [programme.officer@southglos.gov.uk](mailto:programme.officer@southglos.gov.uk))

25<sup>th</sup> July 2013

Dear Mr Crysell,

**Re: South Gloucestershire Core Strategy – Further Consultation**

These representations are made in addition to earlier submissions relating to the Core Strategy Draft Main Modifications, Additional Housing Sites and Further Main Modifications. These representations relate specifically to the issues raised within the letter from South Gloucestershire Council dated 7<sup>th</sup> June 2013 regarding the Council's response to the Inspector on the issue of 5 year housing land supply. A detailed analysis of the additional documents, consisting of the BNP Paribas Assessment of Deliverable Housing Sites and updated Annual Monitoring Report, will be included in submissions made by Hourigan Connolly on behalf of Gladman Developments.

Gladman recognises that the Council is required to be in a position where it can demonstrate a minimum five year supply of housing in order for the Plan to be sound under paragraphs 47 and 182 of the Framework. However, in order for an accurate five year supply to be demonstrated, a full, objective assessment of housing need in the authority area needs to be undertaken so that it is tested against the correct housing requirement.

South Gloucestershire Council's position is that due to the advanced stage of the Core Strategy, the housing requirement contained in the emerging Core Strategy (28,355 dwellings over the period 2006 to 2027) is the correct requirement to base their housing land supply figure on.

However, Gladman has grave concerns regarding the evidence base for this figure. Gladman's view is that South Gloucestershire Council has not met the requirement of paragraph 47 of the Framework that local planning authorities must use their evidence base to ensure that their local plan meets the **full, objectively assessed needs** for market and affordable housing in the housing market area.

The Council has failed to undertake a full, objective assessment of need in the area. The only assessment that has been carried out that meets the criteria has been submitted by Barton Wilmore, which suggests that the housing requirement for South Gloucestershire should be **at least 33,000** for the plan period.

Based on the housing requirement in the emerging plan, South Gloucestershire has a claimed 5.38 years supply of housing. If the housing requirement reflected the full, objectively assessed need as required by paragraph 47 of the Framework, this figure would be substantially lower and five year supply of housing land would not be demonstrated by the Council (Please refer to related representations by Hourigan Connolly on behalf of Gladman).

The most recent SHMA, published in June 2009, notes that there is an average annual need for 1,013 affordable homes in South Gloucestershire. This represents 75% of the average annual requirement in the emerging Core Strategy. The SHMA does not fully assess the market housing need in the area.

Any reduction from delivery of the full requirement can only flow from an objective assessment that demonstrates that fulfilling the full requirement would result in adverse impacts which 'would significantly and demonstrably outweigh the benefits, when assessed against the policies' in NPPF as a whole (as per paragraph 14 of NPPF).

Paragraph 159 of the NPPF specifies the methodology to assist local planning authorities in plan making and understanding their housing needs. The methodology requires that the LPA undertakes a SHMA to assess its full housing needs and thereafter recognises the fact that there is a degree of professional judgement required to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period. In essence, the bullet points that supplement paragraph 159 provide the scope of the work to be undertaken to derive the housing need as **required** by the primary element of the text provided in paragraph 159.

As noted above, paragraph 14 of the NPPF explicitly provides local planning authorities in executing their plan making functions with the ability to reduce overall housing figures below the objectively assessed need where the adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

Gladman submits to you that the figure of 28,355 over the plan period is manifestly unsound. Other arbitrary figures below the objectively assessed requirement of 33,000 do not meet the requirement of paragraph 47 of the Framework.

South Gloucestershire Council state within their letter that the BNP Paribas assessment of housing land supply should be afforded substantial weight, however Gladman strongly disagree with this

approach due to the fact that the outcomes of the report are based on an unsound and unsubstantiated requirement.

The only conclusion must be that the plan is presently unsound and there is the prospect that it will be subject to legal challenge.

Yours sincerely



Kathryn Fitzgerald  
Graduate Planner  
Gladman Developments