

D Lanfear



Mr P Crysell
C/o Kath Thorne
Programme Officer
South Gloucestershire LDF - Core Strategy
Examination

Sunday, 21 July 2013

Dear Mr Crysell,

RE: South Gloucestershire Council Core Strategy - 5 year land supply.

Further to my previous submission and letters, I wish to make the following comments on the Councils 7th June 2013 letter and their Consultants opinion.

I vividly recall at the meeting in June 2011 you allowing a further six months of work to allow the plan to be found sound, however here we are more than two years later with the council still trying to justify its position. A simple question to me is should South Gloucestershire Council be able to submit documentary evidence after the closure of the Examination in Public, surely there must be public review and cross examination/rebuttal of this "opinion"; as it is opinion not fact. I am sure interested planning consultancies will be able to produce their own reports giving a different figure of the available land supply for you to consider.

Whilst South Gloucestershire Council has made great fanfare over the Engine Common Appeal decision by Mr. Neil Pope in their letter to you of 3rd May 2013, I am sure that you have read the decision letter and as such you will be more than aware of South Gloucestershire Council confirming that it did not have a five year land supply. This was repeated at the most recent public enquiry on 26th April 2013 into the planning application at Morton Way North, Thornbury. I am sure you will also be aware of the farcical state of affairs where South Gloucestershire Council were not willing to disclose the quantum of undersupply or allowing technical discussion for Mr. Pope to decide what the undersupply was. The most damning conclusion I can draw from this state of affairs is they simply didn't know, and the Consultants report submitted to you by the Council would appear to confirm this. I am dismayed that it took South Gloucestershire Council six weeks following the Engine Common appeal hearing to instruct a firm of consultants to provide them with an opinion of the current five year land supply.

I can only form the belief this is due to the statement in their letter of response to your proposed further modifications of 3rd May 2013; "demonstrating there is an

adequate supply of land to meet the next five years' requirement is necessary for 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".

The 1996 - 2011 local plan dictated that 11840 dwelling should be completed during the ten years from 1996 - 2006, however only 10690 were finished an **undersupply of 1150 dwellings**. I am unable to find any evidence within the Core Strategy documentation that this undersupply is included in the 2006 - 2027 housing projections, and as such will need to be incorporated into shortfall projections.

The shortfall at April 2012 (based on 28355 dwellings between 2006 - 2027) is 3113 from the 2011/12 Residential Land Survey plus the original 1150 dwellings; a total of 4263 dwellings, the completion figures for the last year (2012/13) indicate 820 dwellings were completed (47% of the Annualised provision identified in the 2012 report). It would seem reasonable to me, the man in the street and part of the community this plan is intended to serve, that the last local plan deemed that to 2006 a specific quantum of dwellings was required to be delivered; it is at odds with common sense then that this proportion of the undersupply should then be rolled on to 2027(the "Liverpool" method), twenty one years after the date they were deemed to be required by. The Core Strategy should be trying to make up this shortfall at the earliest opportunity, certainly within the first five years (the "Sedgefield" method) as this was identified local need by South Gloucestershire Council when the previous Local plan was adopted.

The 2012 Annual monitoring report states:

| Assessment of Five Year Supply against South Gloucestershire Core Strategy Policy CS15 (Inspector's Proposed Main Modifications) | | | |
|---|---|--------------|-------------------|
| | | | 20% Buffer |
| A | Net provision required 2012 to 2017 | 7,788 | 9,345 |
| B | Annualised provision required (A/5 years) | 1,558 | 1,870 |
| | | | |
| C | Total identified deliverable supply 2012 to 2017 (Nov.2012) | 9,387 | 9,387 |
| Five Year supply surplus or deficit (C minus A) | | 1,599 | 42 |
| Five Year supply (C/Ax100) | | 121% | 100% |
| Five Year supply (C/B) | | 6.03 | 5.02 |

The annualised dwelling construction target is 1558 dwellings, 2006 local plan shortfall is an additional 77 dwellings per year so a total requirement of 1635 (using the "Liverpool" approach) per annum or 8175 dwellings for the five year period prior to the 20% requirement; or 8938 dwellings ("Sedgefield" approach) for the five year period prior to the 20% requirement. Therefore the table should read as follows:

| Assessment of Five Year Supply against South Gloucestershire Core Strategy Policy CS15 (Inspector's Proposed Main Modifications) – "Liverpool" | | | |
|---|---|--------------|-------------------|
| | | | 20% Buffer |
| A | Net provision required 2012 to 2017 | 8,175 | 9,810 |
| B | Annualised provision required (A/5 years) | 1,635 | 1,962 |
| | | | |
| C | Total identified deliverable supply 2012 to 2017 (Nov.2012) | 9,387 | 9,387 |
| | Five Year supply surplus or deficit (C minus A) | 1,212 | -423 |
| | Five Year supply (C/Ax100) | 115% | 96% |
| | Five Year supply (C/B) | 5.74 | 4.78 |

| Assessment of Five Year Supply against South Gloucestershire Core Strategy Policy CS15 (Inspector's Proposed Main Modifications) – "Sedgefield" | | | |
|--|---|-------------|-------------------|
| | | | 20% Buffer |
| A | Net provision required 2012 to 2017 | 8938 | 10,725 |
| B | Annualised provision required (A/5 years) | 1,788 | 2,145 |
| | | | |
| C | Total identified deliverable supply 2012 to 2017 (Nov.2012) | 9,387 | 9,387 |
| | Five Year supply surplus or deficit (C minus A) | 449 | -1338 |
| | Five Year supply (C/Ax100) | 105% | 88% |
| | Five Year supply (C/B) | 5.25 | 4.38 |

This assessment would accord with the findings of Mr. Pope at the Engine Common appeal, and the Council's assertion at the subsequent Morton Way (North) appeal although this appears to have been forgotten in their letter to you on the 7th June 2013, "**Clearly this independent assessment constitutes highly material and robust evidence and should be afforded substantial weight.** Moreover, although the Engine Common appeal Inspector concluded the Council did not have a 5 year land supply he did not have the benefit of an assessment independent of both the development industry and the Council when reaching that conclusion".

The 2013 land supply calculation give by South Gloucestershire Council in their letter of 7th June 2013 is:

| Assessment of Five Year Supply against South Gloucestershire Core Strategy Policy CS15 (Inspector's Draft and Further Main Modifications) | | | |
|--|---|--------------|-------------------|
| | | | 20% Buffer |
| A | Net provision required 2012 to 2017 | 8,050 | 9,660 |
| B | Annualised provision required (A/5 years) | 1,610 | 1,932 |
| | | | |
| C | Total identified deliverable supply 2012 to 2017 (Nov.2012) | 10,393 | 10,393 |
| | Five Year supply surplus or deficit (C minus A) | 2,343 | 733 |
| | Five Year supply (C/Ax100) | 129% | 108% |
| | Five Year supply (C/B) | 6.46 | 5.38 |

Again this assessment appears to take no account of the historical under performance of South Gloucestershire Council housing strategy prior to 2006, revised projections to include the 1150 dwelling under supply are below. I would again respectfully assert that the "Sedgefield" approach should be used to deal with this specific element of the historical under supply.

| Assessment of Five Year Supply against South Gloucestershire Core Strategy Policy CS15 (Inspector's Draft and Further Main Modifications) - "Liverpool" | | | |
|--|---|--------------|-------------------|
| | | | 20% Buffer |
| A | Net provision required 2012 to 2017 | 8,435 | 10122 |
| B | Annualised provision required (A/5 years) | 1,687 | 2,024 |
| C | Total identified deliverable supply 2012 to 2017 (Nov.2012) | 10,393 | 10,393 |
| | Five Year supply surplus or deficit (C minus A) | 1,958 | 271 |
| | Five Year supply (C/Ax100) | 123% | 103% |
| | Five Year supply (C/B) | 6.16 | 5.13 |

| Assessment of Five Year Supply against South Gloucestershire Core Strategy Policy CS15 (Inspector's Draft and Further Main Modifications) - "Sedgefield" | | | |
|---|---|--------------|-------------------|
| | | | 20% Buffer |
| A | Net provision required 2012 to 2017 | 9,200 | 11040 |
| B | Annualised provision required (A/5 years) | 1,840 | 2,208 |
| C | Total identified deliverable supply 2012 to 2017 (Nov.2012) | 10,393 | 10,393 |
| | Five Year supply surplus or deficit (C minus A) | 1,193 | -647 |
| | Five Year supply (C/Ax100) | 112% | 94% |
| | Five Year supply (C/B) | 5.64 | 4.70 |

The "Liverpool" approach to deal with the shortfall post 2006 (being within the plan period) is not ideal as it would appear to be storing 5 year land supply problems for later years when the construction targets are not met. The latest available dwelling completion projections (2012 Annual Monitoring report) indicate the 1600 dwelling threshold will only be met in seven of the next fourteen years. 1800 or more dwellings will be completed in only three of the next fourteen years. The 2012 - 2013 completion projections were optimistic by 89 dwellings (10%); the projections for the next two years are for 639 dwellings less than the required annualised provision to be constructed.

It is a shame that the full 2013 Annual Monitoring report (now 3 months late) has not been made available to inform you, consultees and the residents of the number of dwellings constructed in this period. I believe this information is urgently required to enable the core strategy plan to proceed.

The calculation used cannot just be the one that allows the Core Strategy to be found sound "at least at the time your final report is produced". This Core Strategy must be sound for the whole life of the plan, with a realistic assessment of the available land supply now and into future years however painful that may be for the Council.

I fully appreciate that there needs to be further discussion around the number of units a site can actually deliver per annum however this is beyond the lay man.

Are you able to provide an indication to the residents of South Gloucestershire as at what point your patience with the antics of the officers of South Gloucestershire Council will run out?

Surely the identification of further sites will require further Examination in Public.

Is the Core Strategy document the same as the one that has already been subject to the Regulation 27 consultation or will further public consultations need to take place?

For your consideration.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Dean Lanfear