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Town Planning and Urban Design

North Somerset Council Core Strategy Consequential Changes

Examination

Matter 2: Housing Calculation

(Tuesday 21st June 2016)

Statement on Behalf of Hallam Land Management

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Question 2): Is the Council's calculation of residual housing requirement of 1,715 dwellings for the remainder of the plan period an appropriate figure to incorporate into consequential changes the policies?

1. Hallam Land Management (HLM) remains consistent in its view that the adopted housing requirement of 20,985 dwellings (Policy CS13), does not demonstrate an approach consistent with paragraph 49 of the NPPF, nor the guidance contained within the NPPG that require local plans to meet the full objectively assessed needs for market and affordable housing in the housing market area. The figure was underpinned by the Edge Analytic Study, evidence derived from demographic analysis and therefore lacking a critical consideration of economic trends, housing market signals and unmet housing needs in the housing market area. Moreover the requirement appears to be inconsistent with the latest evidence of OAN that has emerged through the West of England SHMA and through the JSP process.

2. Notwithstanding the above, the target of 20,985 dwellings is now the adopted housing requirement for the District, having been the subject of separate examination and found sound. This does not preclude a policy context giving robust positive support for providing in excess of this requirement.

3. HLM is of the view that the Council's supply, as stated in **CC/02** may include a number of categories that are questionable insofar as they could be regarded as "developable", in the context of footnote 12 paragraph 49 of the NPPF. Within categories some sites included as part of the supply will not come forward as anticipated by the Council. If the adopted housing target is to be afforded weight by the Inspector, the Council's calculation of shortfall of 1,715 may well need to be increased but in any event the policies should afford support for delivery of housing significantly in excess of this figure, to ensure an approach that accords with the requirements of the NPPF, to "significantly boost" the supply of housing.

4. Indeed, if the Council has overstated its supply, the shortfall could be argued to be far greater than 1,715 dwellings, again, this could further exacerbate growth in the housing need backlog. The adoption of a housing requirement that is not OAN, coupled with a reliance on a "shortfall" figure, predicated on an overestimation of supply figures, are significant reasons to oppose the inclusion of a stated residual housing requirement of 1,715, within the policy text.

5. It is also relevant that the housing requirement is an interim figure, policy CS13 includes a commitment to review the housing requirement within three years, at the latest by the end of 2018, from which point the District's requirement will be identified through the joint West of England Plan (2016-2036).

6. The Council assert at para 9 of the Executive Report to the Consequential Changes to the Remitted Policies (**CC/07**), that a proportionate approach should be taken to the examination, given the time limited nature of the Core Strategy. Hallam Land Management consider that the remitted policies, however short lived, must still be assessed against the soundness tests, as set out at para 182 of the NPPF.

7. Notwithstanding the adoption of an "interim" housing target, the NPPF requires the Council to meet the objectively assessed needs of the housing market area, and as such, North Somerset Council have an obligation to provide sufficient housing land to meet the objectively assessed needs of the area, in as far as this can be achieved in the absence of an up to date SHMA. Furthermore, given the remitted policies will provide the framework for the Site Allocations Plan, that document not being considered for adoption until April 2017, plan-led delivery is further constrained.

8. Such an approach is critical, as adoption of a strategy that does not provide a sufficient framework to meet the housing requirement, even such a requirement that is only in place for an interim period, would lead to under provision of housing over a number of years, the consequences of which include additional housing stress and affordability issues and growth of housing need backlog which becomes even more difficulty to address in the review of the interim requirement. The Inspector must be satisfied that the remitted policies provide sufficient certainty for the delivery of housing both in the short-term to deliver the Core Strategy numbers, in part through the Site Allocations Plan; and over the longer term looking ahead to the requirements of the Joint Core Strategy.

9. It is therefore critical that policies and allocations are sufficiently flexible to accommodate significant growth within the District, in excess of that currently identified by the Council, and having regard to future growth requirements of the Joint Spatial Plan, to meet market and affordable housing needs, particularly in the short-term. Hallam Land Management argue the need for flexibility within policy CS32 specifically, this is set out in the hearing statement for Matter 4a.

10. Notwithstanding the importance of a flexible policy framework, for the reasons referred to within the statement, HLM considers that the spatial strategy as proposed by North Somerset Council, provides an appropriate spatial hierarchy within which increased levels of growth within the District can be accommodated, including as it does, recognition that a substantial scale of growth is necessary at the service villages along with Weston and the three main towns