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For and on behalf of
Taylor Wimpey

NORTH SOMERSET CORE STRATEGY EXAMINATION OF REMITTED POLICIES

HEARING STATEMENT: MATTER 2, HOUSING CALCULATIONS

Prepared by
Adrian Hunter BA Hons, BTP
DLP Planning Ltd
Bristol

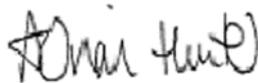
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Prepared by:



Annie Taylor
Planner

Approved by:



Adrian Hunter
Director

Date:

May 2016

DLP Planning Ltd
5th Floor
Broad Quay House
Prince Street
Bristol
BS1 4DJ

T 01179 058850

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MATTER 2 – HOUSING CALCULATION

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

Housing requirement

- 1.1 The Council base their remaining requirement of 1,715 dwellings on the housing requirement identified in Policy CS13 and extends to 2026, covering only a 10 year period. This limited period and constrained requirement is as a result of the Core Strategy (CS) being found unsound and the need for the Council to review the various remitted policies. Importantly, this does not however detract from the necessity for the Council to ensure that the CS is compliant with the NPPF.
- 1.2 As part of the evidence base to inform the preparation of the Joint West of England Plan, a new Strategic Housing Market Assessment (SHMA) for the Wider Bristol Housing Market Area (HMA) has been completed. The Report was published in July 2015 and identified a need for 85,000 homes across the HMA from 2016 to 2036. Over the 20 year plan period this equates to 4,250 per annum. By contrast, the Core Strategies of the authorities within the HMA provide for in the region of 3,710 homes per annum, a figure which is substantially less than the latest evidence is showing is needed. This of course is on the basis that that SHMA is accepted at the current level, the detail of which is a matter of on-going debate and will only be resolved through the JSP process, with the potential for SHMA number to be significantly increased. On the basis of the evidence, there is therefore a clear need to increase housing provision.
- 1.3 However, given that the overall housing target has been adopted, if the residual requirement is not to be reviewed, then it is essential that the residual housing requirement is identified as being the minimum number that must be provided. As a consequence, suitably flexible policies which encourage sustainable development and provide certainty to landowners and developers alike, should be provided. Such flexibility would allow new developments to come forward in a timely manner and remove the existing constraint.

Overall housing supply

- 1.4 The Council provide their response to the issues identified by the Inspector in their submissions dated 14th March 2016. In terms of their housing number they identify:

Overall Housing requirement (CS13)	20,985
Completions 2006-2015	7426
With consent	6,558
Allocated sites	1,472
Proposed NSSAP Allocations	2,026
Identified sites with no significant constraints	589
Windfall	1,200
Total	19,270
Residual	1,715

- 1.5 The Council's supply is therefore drawn from a number of sources including completions, permissions (including sites subject to a resolution to grant permission), existing allocations, allocations that are or will be proposed in the NSSAP and a windfall allowance. There are however a number of issues with the reliability on some of these sources and therefore the amount they can contribute to the supply.

Extant permissions

- 1.6 The Council have identified a total of 6,558 dwellings can be delivered from extant planning permissions. The Council explain this in Paragraph 44(i) of the 14th March submission:

This category includes all sites with an extant planning permission or resolution to approve subject to a legal agreement, regardless of the size of the site. Some of the units within this category are already under construction, and deliverability of each of the large sites is assessed on an annual basis by contacting developers/landowners in line with the NPPG advice.

- 1.7 It would appear from the above that the Council have made no allowance for some of these units not coming forward due to permission lapsing or schemes not being implemented. There are a number of reasons why planning permissions may not be

implemented, or amended such as ownership issues, unknown site-specific constraints and infrastructure requirements.

Existing allocations

- 1.8 The Council also place a heavy reliance upon sites that were allocated in the 2007 North Somerset Replacement Local Plan. As with sites with extant planning permission, the Council should be making provision for some of these sites not delivering at the expected capacity. These sites have been undeveloped for nine years and have yet to deliver, there must therefore be some doubt over the potential for all these sites to come forward in this plan period. Given the amount of time which has lapsed, it would be unrealistic not to expect there to have been a change in circumstances on some of these sites and the Council should therefore make provision for this.

Proposed allocations

- 1.9 Despite the plan not being adopted, and yet to be submitted for examination, the Council are also relying upon proposed allocations in the NSSAP. It is likely that some or all of these allocations are the subject of unresolved objections, which may not be resolved until the plan has been through Examination. Furthermore the Council are proposing further sites which have been recently added to the NSSAP, of which there are no details and there has to therefore be questions about their deliverability. It would appear unsound to be relying upon these proposed allocations and the weight to be afforded to these policies should be determined in the context of the NPPF (paragraph 216).
- 1.10 As a result of a robust application of lapse rates, recognition that emerging allocations are not a reliable source and a recognition that the housing requirement forms a minimum which doesn't represent the current needs, the identified residual requirement of 1,715 homes is an under estimation of the total housing needs in North Somerset.

Summary

- 1.11 To ensure the delivery of the housing growth required by Policy CS13, the CS must provide a positive framework to facilitate growth. To achieve this, strategic allocations should be made and there needs to be flexibility within the policies to allow for sustainable development.

- 1.12 To meet the housing supply, the Council is currently relying upon allocations from the emerging North Somerset Sites and Policies (NSSAP) which, due to the fact that this document is still at a relatively early stage in the process, should not be afforded significant weight. It is likely that until this Plan is sufficiently advanced and outstanding objections have been addressed, the delivery of new development across North Somerset will remain constrained. The Council should now be looking to develop flexible policies, which promote new opportunities for sustainable development.
- 1.13 The most appropriate way to resolve this is through the provision of strategic allocations within the Core Strategy. Furthermore, given that the NSSAP is not sufficiently advanced, and in order to make an allowance for non-implementation rates on the existing allocations which have been carried forward, without further allocation, the Council is unlikely to be able to demonstrate a five-year land supply.

BEDFORD - BRISTOL - CARDIFF - LEEDS - LONDON - MILTON KEYNES - NOTTINGHAM - RUGBY - SHEFFIELD

BEDFORD

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832 740
Fax: 01234 831 266
bedford@dlpconsultants.co.uk

BRISTOL

Broad Quay House (5th floor)
Prince Street
Bristol
BS1 4DJ

Tel: 0117 905 8850
bristol@dlpconsultants.co.uk

CARDIFF

Sophia House
28 Cathedral Road
Cardiff
CF11 9LJ

Tel: 029 2064 6810
cardiff@dlpconsultants.co.uk

LEEDS

Princes Exchange
Princes Square
Leeds
LS1 4HY

Tel: 0113 280 5808
leeds@dlpconsultants.co.uk

LONDON

The Green House
41-42 Clerkenwell Green
London
EC1R 0DU

Tel: 020 3761 5390
london@dlpconsultants.co.uk

MILTON KEYNES

Midsummer Court
314 Midsummer Boulevard
Milton Keynes
MK9 2UB

Tel: 01908 440 015
Fax: 01908 357 750
miltonkeynes@dlpconsultants.co.uk

NOTTINGHAM

1 East Circus Street
Nottingham
NG1 5AF

Tel: 01158 966 620
nottingham@dlpconsultants.co.uk

SHEFFIELD / SPRU

Ground Floor
V1 Velocity Village
Tenter Street
Sheffield
S1 4BY

Tel: 0114 228 9190
Fax: 0114 272 1947
sheffield@dlpconsultants.co.uk

**WILBRAHAM ASSOCIATES
RUGBY**

18a Regent Place
Rugby
Warwickshire
CV21 2PN

Tel: 01788 562 233
info@wilbrahamassociates.co.uk