

POSITION STATEMENT

NORTH SOMERSET CORE STRATEGY

ISSUE 1 (A-D) DISTRICT HOUSING LAND
REQUIREMENT

ON BEHALF OF,

MEAD REALISATIONS LTD AND THE MANOR FARM
LAND OWNERS CONSORTIUM

NOVEMBER 2011

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Introduction

- I.1 Origin3 is instructed by Mead Realisations Ltd and the Manor Farm Land Owners Consortium to submit this Position Statement in respect of various sites within our client's ownership.
- I.2 This statement provides as a summary of, and update to, previous representations submitted to the Core Strategy. The statement is intended to aid the Inspector and discussion at the relevant Examination session, and we therefore deal with the specific issues for discussion set out in the examination programme (version 2, 5th October ED/07a).

(A) Justification for the Revised Core Strategy Target of 14,000 Dwellings Compared With Draft RS Figure of 26,750

- I.3 Mead Realisations Ltd and the Manor Farm Landowner Consortium questioned the appropriateness of the housing figure set out in draft Policy CS13 through their original representations. In summary the concerns were:
 - Not in accordance with the evidence informing the draft RSS. (not Justified)
 - The nature of the instruction to Mr Woodhead in his arrival at the overall housing requirement (not justified)
- I.4 The starting point for the Plan and housing provision in particular, should be its legal compliance with the Compulsory Purchase Act 2004 (PPG12 paragraph 4.50), in particular, the need to conform generally to the Regional Spatial Strategy. It is unclear from the information produced by the Council and the overall housing requirement that compliance with the RSS has been demonstrated. The recent CALA decision reaffirms that until such time as the Localism Bill is enacted and the revocation of Regional Spatial Strategies has been assessed through necessary Strategic Environmental Assessment work, the requirement under paragraph 4.50 of PPS12 remains.
- I.5 We struggle to see how the matter of general conformity with the requirement in RPG10 for 3,700 dwellings per annum for the former county of Avon (1996-2016) has been translated into the housing requirement set out in Policy CS13? Conformity has

not in our view been reached. The application of this figure based upon apportionments set out in the Joint Structure Plan would result in a 20 year need for 21,460 dwellings.

- I.6 The lack of consistency with the current regional tier of policy also bring into question why there is such a disparity between the draft RSS figure of 26,750 and the locally set figure of 14,000? The latest paper prepared by Mr Woodhead (ED/15a), at paragraph 8.4 suggests that modelling based upon CLG household projections shows a need for between 17,800 and 18,100 dwellings but this is then subject to a caveat to the effect of constraining housing growth to establish a better balance between housing and jobs.
- I.7 The effect of artificially constraining housing delivery in this manner could be damaging to economic stability and growth by:
- Increasing house prices.
 - Reducing choice.
 - Constraining economic growth in the construction industry.
 - Constraining the timely delivery of infrastructure through CIL.
 - Limiting the delivery of affordable housing.
 - Making North Somerset less attractive to live and work.
 - Having an adverse effect upon the demographic age profile of the aging population.
- I.8 It does not appear that any of these matters have been effectively examined and a justified conclusion drawn.
- I.9 Mead Realisations, through other representations, would wish to see a focus upon the delivery of key infrastructure, including housing to make North Somerset more attractive to employment and a more pro-active employment strategy for increasing job delivery over an artificial housing constraint.

(B) Cross-boundary Implications of the revised housing target for Bristol city and other neighbouring districts

I.10 We note that the adopted Bristol Core Strategy does not require land in North Somerset to meet its overall housing target. However, this is subject to review later in the plan period.

(C) Potential additional contingency housing land supply

I.11 The principle of including an additional contingency does not form part of the Core Strategy and such a policy change was not tested through the SEA work originally undertaken. There has been no consultation on such an approach.

I.12 It would be difficult to see how such an alteration would fall within the legal requirement to prepare a plan in accordance with the LDS and SCI.

(D) Housing needs

I.13 Mead Realisations supports the majority of housing growth at Weston-super-Mare and is committed to delivering housing and employment at Weston Villages.

I.14 In light of the latest evidence, the housing requirement should be more closely related to 18,100 dwellings. This is based upon the central projection of the unadjusted econometric testing and appears to be the accepted housing need before being adjusted downwards to reflect a rebalancing of housing and jobs.