

## Delivery

### a-b . Housing Trajectory/ Land Availability- Achievable

The Council's Housing Trajectory as set out in HD18 demonstrates its plan to substantially underprovide for net housing growth during the period of the plan to the tune of at least 8000 homes.

Further, the Policies of the plan will seek to constrain the housing demand across the district, especially during the period from 2016 onwards to 55% and 42% respectively, of 2006-2011 housing levels, without any evidence that real demand will reduce during this period or that the Council can realistically restrict demand.

This PS will consider the impact of the draft CS Policies on the proposed trajectory during the periods:

- A. 2011-2016
- B. 2016-2021
- C. 2021-2026\*

- It is our view that the plan period should have a 15 year time horizon. (NPPF)ie to 2027/2028

It is not the purpose of this strategic plan, in its text or in its policies, to anticipate how Developers or the Council will seek to negotiate or interpret relevant policies or indeed provide more 'workable/flexible' planning conditions or agreements. That may be more appropriate at the SPD stage, to masterplanning or to individual planning applications.

For the purposes of the soundness test it is a matter of whether the policy or policies as drafted are justified and effective. We shall be making further representations on this matter in the light of the Inspector's comments and the Joint Position Statement. In the meantime we are addressing our comments upon the Published Version of the CS.

### **2011-2016**

As described HD18, approx. 89% ( 3791 homes) of the forecast demand 2011-2016 are 'committed' by the Council. The balance is made up of 450 new homes at Locking Parklands(see Table 1 HD 18).

Subject to adequate provision and timing of infrastructure, this appears superficially to be entirely achievable and deliverable. There are however significant assumptions that need proper consideration, that should be tested under 'deliverability of the trajectory'.

Unpick the trajectory and we see that a substantial element of the housing ( 59%) is subject to Policy CS20 and CS30 and is therefore conditioned by the provision of 1.5 B Class Jobs\*\*, on site, in phases of 250 homes at a time.

CS20 and CS30 will require :

1. 1450 x 1.5 B class jobs = 2175 B class jobs provided in the Weston Villages
2. 1063 x 1.5 B class jobs = 1594 B class jobs provided in Weston Town Centre and Gateway

Total 3769 B Class Jobs

As the housing provision is employment-led, the trajectory will require delivery of on-site employment to the tune of 753 B Class jobs per annum, between 2011 and 2016. The Council have so far not amply demonstrated where these jobs will be located and what level of infrastructure and investment will be required from the Council and the Developers to make them available and deliverable, in the same manner as housing delivery.

The Council point out at paras 4 &13 (HD 18) that the delivery of this trajectory is sound and that past success of meeting housing trajectories has been a feature of this authority. We would not take issue on this point, however there are clear differences in this dCS with the application of new employment led housing policy.

The trajectory 2011-2016 is consequently unrealistic as proposed and this make the plan unsound.

## **2016-2021**

As described HD18, approx. 86% ( 2350 homes) of the forecast provision 2016-2021 are located at Weston Villages and 175 homes at Weston S Mare.

Consequently almost the entire element of the housing in this period of the plan is subject to Policy CS20 and CS30 and is therefore conditioned by the provision of 1.5 B Class Jobs\*\*, on site, in phases of 250 homes at a time.

CS20 and CS30 will require :

1. 2350 x 1.5 B class jobs = 3525 B class jobs provided in the Weston Villages
2. 175 x 1.5 B class jobs = 262 B class jobs provided in Weston Town Centre

Total 3787 B Class Jobs

As the housing provision is employment-led, the trajectory will require delivery of on-site employment to the tune of 757 B Class jobs per annum, between 2016 and 2021. The Council have so far not amply demonstrated where these jobs will be located and what level of infrastructure and investment will be required from the Council and the Developers to make them available and deliverable, in the same manner as housing delivery.

Evidence suggests that even where serviced employment is available, the take up in WsM is extremely low. The Council have to consider and apply a realistic trajectory of B Class jobs growth at WsM before determining a deliverable trajectory.

The trajectory 2016-2021 is consequently unrealistic as proposed and this make the plan unsound.

## 2021-2026

Approx. 82% ( 1700 homes) of the forecast provision 2021-2026 are located at Weston Villages and 175 homes at Weston S Mare.

Consequently almost the entire element of the housing in this period of the plan is subject to Policy CS20 and CS30 and is therefore conditioned by the provision of 1.5 B Class Jobs\*\*, on site, in phases of 250 homes at a time.

CS20 and CS30 will require :

1. 1700 x 1.5 B class jobs = 2550 B class jobs provided in the Weston Villages
  2. 175 x 1.5 B class jobs = 262 B class jobs provided in Weston Town Centre
- Total 2812 B Class Jobs

\*\* The proposed amendment to this Policy as suggested at Day1 of the inquiry is not considered effective or clear and for the purposes of this PS, is not taken into account.

The Policies of the plan provide no flexibility to deliver the trajectory from other sources, where B Class jobs take up is slow. The Council should run alternative, realistic trajectories based upon the historic take up of B Class Jobs at Weston S Mare. This historic analysis should be considered realistic, as it is locational specific, but with a trend towards optimism, given the challenging economic situation we face. Such historic analysis will include a healthy and growing workforce, through strong housing growth throughout the last 15 years.

### c- g Infrastructure

The Infrastructure Projects to support large scale development are considerable and therefore all elements of c-g are particularly germane when it comes to residential development at Weston Villages.

The Councils studies ED 16 and ED12 provide a broad overview of the scale of the infrastructure , critical and necessary to the deliverability of the whole Weston Villages project. Much of the costs are upfront ie Weston Package, transport, Cross Airfield Link, Superpond etc and therefore it is not at all clear how upfront funding will be secured. Simply referring to Rotating Infrastructure Funds or CIL or even New Homes Bonus is wild speculation.

The outcome of the Major Scheme Bid in favour of WsM Package is vital for growth at WsM for without it, a further financial burden is placed upon developers. The Inquiry should consider alternative scenarios if the Bid fails to secure funding.

The Council have published revised assessment on flooding storage and funding. This will need to be reviewed given that a fundamental policy objective of development in flood plain is to ensure no loss of flood storage capacity, address increased run-off and to provide betterment, that is increased flood storage.

The Council's assessment does not consider maintenance of the flood infrastructure which if transferred to Drainage Boards or EA, will require major financial bonds to be put in place.

#### Employment Space Provision and its Infrastructure

It should not be lost from proper consideration, that when the Policies are clearly 'employment led', that adequate assessment of infrastructure needs for employment provision are also taken into account. As the structure of phasing homes and jobs is so intimately related here (in 250 home tranches). The need for upfront employment infrastructure costs is significant.

For example: Weston Airfield – Persimmon Homes Table 1 HD 18 shows a trajectory of approximately 700 new homes 2011-2016. The direct infrastructure implications are set out in ED 16.

This housing will need to be accompanied by c. 1050 new B Class jobs, on the WAF Business Quarter and WAF Industrial Quarter (together having capacity for 2600 new jobs). Infrastructure for this development is not inconsiderable (there are areas of common infrastructure ie CAL) however flood protection, storage and compensation is a major cost to employment that needs to be addressed. This is not addressed in ED 31.

However more fundamentally, the costs of making employment sites available in the first place, particularly when take up may be slow. The implications of 'super-serviced' employment sites (ED25) is a reflection of the difficulty facing residential developers at Weston Villages.

This adds to the infrastructure and delivery costs of the whole project and ultimately tests the viability and deliverability of it as set out in the trajectory.

At Locking Parklands, the provision of a large '£50 million' leisure facility at this location will deliver 500+ jobs, it is said. Setting aside the 'B Class Jobs' case, this means that the trajectory and delivery of the 650 further homes at Locking Parklands is largely dependant upon this scheme going ahead as soon as possible.

I have no knowledge of the experience or track record of Leisure Dome (UK) Ltd. As far as I am aware, this is the first such venture of this organization.

However, it is relevant to the test of soundness as to whether the linked/dependant 'infrastructure' ie Leisure Dome (UK) Ltd and it's Snow Dome at Locking Parklands is a viable project that will come forward at this difficult economic time. In addition and perhaps more importantly, whether it will be capable of generating the new jobs growth that the housing trajectory is based upon. Like other infrastructure requirements, is it dependant upon public funding or other sources. What happens if there is a delay in the project?

The infrastructure of employment as well as the delivery of employment at the Weston Villages is a critical element of the delivery. This has not been addressed sufficiently to make the plan sound, particularly given the history of employment growth at WsM and the economic conditions that exist today.