

Draft SoCG on Local Plan Backlog, Core Strategy Shortfall, General Conformity with RPG10 and calculating the 5 year Housing Land Supply Requirement

The Council

All Parties: Wolf Bond Planning, d2Planning, Ashlar Group, Tetlow King, Hignett Family Trust

A. Local Plan Backlog and Core Strategy Shortfall

It is agreed as follows:

Local Plan Backlog

1. The housing requirement of the BANES Local Plan 1996-2011 was 6,855 (457 pa).
2. To 2006, 3,719 homes had been built resulting in a 'backlog' at this point of **851** homes.
3. Between 2006 and 2011, a further 1,967 homes were built resulting total delivery of 5,686 for the whole Local Plan Period. However the target LP was missed by **1,169**.

Draft Core Strategy Shortfall

4. The Draft Core Strategy proposes 11,000 homes (550pa) 2006-2011.
5. As stated in (3), 1,967 homes have been built since 2006. This results in a shortfall against the annualised Core Strategy requirement to 2011 (2,750) of **783** homes.

Combined Local Plan Backlog / Local Plan Shortfall to 2011

6. This is calculated as $851+783 = 1,634$. Alternatively one could arrive at the same figure by adding $[(550-457) \times 5]$ to 1,169.

Observations

7. The draft Core Strategy currently makes no additional provision for making up the Local Plan 'backlog' of **851** to 2006.
8. The Council's technical requirement for the Draft Core Strategy is 12,100. The Draft Core Strategy planned for 11,000 homes. The difference is **1,100** homes.
9. In combination the Local Plan backlog and difference between the Draft Core Strategy and the Council's technical requirement is **1,951**.

B. General Conformity with RPG10 (the RS)

It is agreed as follows:

1. Policy HO1 of RPG10 (the RS) set out a requirement for 3,700 homes per annum for 1996-2016 in the former County of Avon (74,000 homes overall). RPG10 did not apportion this requirement between the four authorities. This was the role of the County Structure Plan, which, for the period 1996-2011 set out the following distribution, whereby BANES received a 12.4% share of development.

BANES	6,200	(The Local Plan set a target of 6855 Homes)
Bristol	13,000	
N. Somerset	14,900	
S. Glos	16,100	
Avon	50,200	

2. If the BANES apportionment for 1996-2011 is applied to the entire requirement for the former Avon area of 74,000 to 2016 it results in figure of 9,176. This establishes an indicative position (as no formal apportionment took place for the period 2011-2016) against which to assess whether the Core Strategy's annualised requirement is in general conformity with RPG10.
All Parties other than the Council say: There is no benefit in speculating what the RPG apportionment could have been during 2011-2016 as the RSS process undertook this task, which was subsequently suspended and followed up by the draft Core Strategy under the Localism Act. The draft Core Strategy provides for 550 homes per year 2006-2026. In the absence of any adopted plan post 2011, which apportions RPG10 housing, conformity can only be relevant to pre-2011 Local Plan targets, which remain to be delivered. Delete 2.
3. There was a net increase of 3,719 homes in B&NES between 1996 and 2006.
4. In BNES/31 (on counting off-campus cluster flats towards housing supply), the Council states that it intends to update its monitoring figures to include an additional 120 dwellings for the period 1996-2006. Other participants do not agree that this source of supply should be included. Separate statements will be made in response to BNES/31. **All Parties other than the Council say: Reference to student accommodation should be removed from this SoCG until the matter is debated under BNES 31 and full account of student population is taken into account pre and post 2006. Delete 4**
5. Subject to this source of supply being included (and to the specific figure of 120 being agreed) the housing delivery figure between 1996 and 2006 increases to 3,839. **All Parties other than the Council say: Reference to student accommodation should be removed from this SoCG until the matter is debated under BNES 31 and full account of student population is taken into account pre and post 2006. Delete 5**
6. The additional requirement to be planned for from 2006-2016 in respect of general conformity with RPG10 is calculated as 9,176 minus 3,839 = 5,337 (if off-campus cluster flats built 1996

2006 are included as calculated in BNES/31), or 9,176 minus 3,719 = 5,457 (if off-campus cluster flats are excluded). All Parties other than the Council say: Reference to student accommodation should be removed from this SoCG until the matter is debated under BNES 31 and full account of student population is taken into account pre and post 2006. Delete 6

7. These figures equate to an annualised dwellings requirement for 2006-2016 of 534-546. All Parties other than the Council say: Reference to student accommodation should be removed from this SoCG until the matter is debated under BNES 31 and full account of student population is taken into account pre and post 2006. Delete 7
8. The Core Strategy as submitted for examination plans for 11,000 homes at an average annual rate of 550. BNES/26 proposes that this is increased to 11,500 or 575 per annum. All Parties other than the Council say: Reference to student accommodation should be removed from this SoCG until the matter is debated under BNES 31 and full account of student population is taken into account pre and post 2006. Delete 2nd sentence of 8
9. Purely on the basis of what is being planned for, in terms of the annualised rate of delivery, the Core Strategy is in general conformity with the RS. However, the future delivery trajectory is also important. Not agreed by all Parties other than the Council
10. As set out in paragraph 15 below there have been 1,967 completions 2006-2011. This rises to 2,160 if off-campus student cluster flats are included. All Parties other than the Council say: Reference to student accommodation should be removed from this SoCG until the matter is debated under BNES 31 and full account of student population is taken into account pre and post 2006. Delete 2nd sentence of 10
11. The residual requirement from 2011 (i.e. next 5 years) in respect of the indicative RS target is therefore, either:

9,176 minus (3,839 + 2,160) = 3,117 (with the inclusion of built off-campus student cluster flats),
or
9,176 minus (3,719 + 1,967) = 3,490 (non-inclusion).

All Parties other than the Council say: There is no benefit in speculating what the RPG apportionment could have been during 2011-2016 as the RSS process undertook this task, which was subsequently suspended and followed up by the draft Core Strategy under the Localism Act. The draft Core Strategy provides for 550 homes per year 2006-2026. In the absence of any adopted plan post 2011, which apportions RPG10 housing, conformity can only be relevant to pre-2011 Local Plan targets, which remain to be delivered. Reference to student accommodation should be removed from this SoCG until the matter is debated under BNES 31 and full account of student population is taken into account pre and post 2006. Delete 11

12. The May 2011 SHLAA indicates a deliverable supply of 3,346 (not including 193 built student cluster flats) for 2011-2016. If the deliverable supply is accepted then general conformity is evident. Not agreed for the reasons above. Delete 12.

13. Other participants have made general and detailed observations on the 5 year deliverable supply and have previously made separate representations/statements on this matter .All Parties other than the Council agree that to conform with RPG10, the minimum housing requirement to be met in the 5 Year Land Supply, is the Scenario set out in paragraph 26, namely a requirement of 4,227 homes (Draft NPPF: x1.2 = 5,072) or less than 4 Years supply.
14. The Inspector may conclude that current the 5 year deliverable supply estimate should be downgraded. In such circumstances a judgment will need to be made as to whether the extent of any gap between deliverable supply and the indicative RPG10 requirement warrant a negative conclusion in respect of general conformity. Speculative Delete 14
15. The separate matter of the 5 year housing land supply requirement in respect of the management of Core Strategy shortfall to date and any inclusion or management of Local Plan shortfall is addressed below.

C. 5 Year Land Supply Requirement

It is agreed that:

Introduction

16. A number of scenarios are presented below. The first two illustrate the impact on the 5-year supply requirement of managing the notional Core Strategy shortfall 2006-2011 over 5 or 15 years. The Local Plan backlog is not included in the first two scenarios.
17. The third and fourth scenarios illustrate the additional impact on the 5-year supply requirement of including and dealing with the Local Plan backlog, again over 5 or 15 years.
18. Against each scenario, variation (a) relates to an overall target of 11,000 and variation (b) relates to a revised target of 11,500 (set out in BNES/26). The uplift in target relates to the inclusion of the full SHLAA capacity of 11,200 and about 300 units from off campus cluster flats (set out in BNES/31)¹. Again, participants will respond separately to BNES/26 and BNES/31. A further variation (c) is provided the context overall requirement of 12,100. For the sake of achieving some degree of brevity (and a scenario 1d) the impact of counting student cluster flats in the context of a target of 12,100 is not shown. The purpose of this part of SOCG is merely to establish an agreed position on the arithmetic involved in relation to each scenario and to establish the preferred approach of the Council and other participants.
19. Against all scenarios the final total (shown in red) can be multiplied by 1.2 to show the further additional impact of the Draft NPPF (shown in blue). A summary table of all scenarios and variations is provided at the end of this section.

¹ 193 built 2006-2011 (Twerton Riverside). A further 345 bedspaces (107 units) with outline planning permission at BWR. Delivery not before 2016. See BNES/31 for further details.

20. The Council consider that scenario 1 should be applied and that it is not prohibited from annualising the Core Strategy shortfall over the remainder of the plan period. All Other Parties consider that scenario 4 or Para 26 (variant 1 (c) is the correct basis against which to determine the 5 year supply position. Scenario 4 includes the Local Plan backlog and seeks to redress this and the Core Strategy shortfall within the next 5 years. **For the avoidance of doubt the All Other Parties wish to make clear that as set out in their submissions to the Hearings, the level of Core Strategy housing requirement that they recommend to the Inspector is significantly higher than the levels in Scenario 4, including variation (c) but that this provides a helpful illustration.**

Scenarios 1 and 2

21. The Core Strategy as submitted for examination plans for 11,000 dwellings at an average annual rate of 550 per annum. BNES/26 proposes that this increases to 11,500 at an average annual rate of 575 per annum. Participants will comment on this proposed change separately.
22. Delivery between 2006 and 2011 was 1,967. This rises to 2,160 if off-campus student cluster flats are included.

Scenario 1a: Submitted target of 11,000, Core Strategy shortfall to 2011 managed over 15 years. Local Plan shortfall not included.

$(11,000 - 1,967) / 15 = 602.2$, multiplied by 5 = **3,011**
(Draft NPPF x1.2 = 3,613)

Scenario 1b: Revised target of 11,500, Core Strategy shortfall to 2011 managed over 15 years. Local Plan shortfall not included.

$(11,500 - 2160) / 15 = 622$, multiplied by 5 = **3,110**
(Draft NPPF: x1.2 = 3,732)

Scenario 1c: Revised target of 12100, Core Strategy shortfall to 2011 managed over 15 years. Local Plan shortfall not included.

$(12,100 - 1967) / 15 = 675$, multiplied by 5 = **3,377**
(Draft NPPF: x1.2 = 4,053)

Scenario 2a: Submitted target of 11,000, Core Strategy shortfall to 2011 managed over 5 years. Local Plan shortfall not included.

This can be shown simply as the difference between the annualized requirement to 2016 minus completions to 2011.

$(10 \times 550) = 5,500$, minus 1,967 = **3,533**
(Draft NPPF: x1.2 = 4,240)

Scenario 2b: Revised target of 11,500, Core Strategy shortfall to 2011 managed over 5 years. Local Plan shortfall not included.

Again, this can be shown simply as:

$(10 \times 575) = 5,750$, minus $2,160 = 3,590$
(Draft NPPF: x1.2 = 4,308)

Scenario 2c: Revised target of 12100, Core Strategy shortfall to 2011 managed over 5 years.
Local Plan shortfall not included.

Again, this can be shown simply as:

$(10 \times 605) = 6050$, minus $1967 = 4083$
(Draft NPPF: x1.2 = 4,899)

Scenarios 3 & 4

23. Further to the context set out in paragraphs B11-14:
24. The annualised Local Plan requirement (1996-2011) was 457 and resulted in an overall target of 6,855. Table 3.2 of the SHLAA Findings Report shows that to 2006 delivery was 850 behind the indicative cumulative requirement needed at that time to be 'up with the run rate'.
25. If pre 2006 off-campus cluster flats are retrospectively added to the supply, the shortfall reduces to 730. From the perspective of other participants this source of supply is subject to the same caveat as in paragraph 4.

Scenario 3a: Submitted target of 11,000 increased to 11,850 with inclusion of Local Plan backlog. Both Core Strategy shortfall and Local Plan Backlog managed over 15 years².

$(11,850 - 1967) / 15 = 659$, multiplied by 5 = **3,295**
(Draft NPPF: x1.2 = 3,954)

Scenario 3b: Revised target of 11,500 increased to 12,350 with inclusion of Local Plan backlog. Both Core Strategy shortfall and Local Plan Backlog managed over 15 years³

$(12,350 - 2,160) / 15 = 671$, multiplied by 5 = **3,355**
(Draft NPPF: x1.2 = 4,026)

Scenario 3c: Revised target of 12,100 increased to 12,950 with inclusion of Local Plan backlog. Both Core Strategy shortfall and Local Plan Backlog managed over 15 years

$(12,950 - 1967) / 15 = 732$, multiplied by 5 = **3,661**
(Draft NPPF: x1.2 = 4,393)

Scenario 4a: Submitted target of 11,000 increased to 11,850 with inclusion of Local Plan backlog. Both Core Strategy shortfall and Local Plan Backlog managed over 5 years

This is basically the output of 2(a) – topped up by 850

$(10 \times 550) = 5,500$, minus $1,967 = 3,533$, plus $850 = 4,383$
(Draft NPPF: x1.2 = 5,260)

² The implication here is that one third (283) of the total LP shortfall is dealt with in the next 5 years

³ The implication here is that one third (283) of the total LP shortfall (adjusted for cluster flats) is dealt with in the next 5 years

Scenario 4b: Revised target of 11,500 increased to 12,350 with inclusion of Local Plan backlog. Both Core Strategy shortfall and Local Plan Backlog managed over 5 years

Similarly, this is basically the output of 2(b) – topped up by 850

$(10 \times 575) = 5,750$, minus $2,160 = 3,590$, plus $850 = 4,440$

(Draft NPPF: x1.2 = 5,328)

Scenario 4c: Revised target of 12100 increased to 12,950 with inclusion of Local Plan backlog. Both Core Strategy shortfall and Local Plan Backlog managed over 5 years

Similarly, this is basically the output of 2(c) – topped up by 850

$(10 \times 605) = 6050$, minus $1967 = 4083$, plus $850 = 4,933$

26. **(Draft NPPF: x1.2 = 5,919)** There are also intermediate scenarios lying between scenarios 3 and 4 e.g. Core Strategy shortfall managed over 15 years and Local Plan backlog over 5 years. The arithmetic merely requires the adding of 730 to the output of scenario 1(a) or 850 to scenario 1(b). Both calculation results in a requirement of about **3,850 (Draft NPPF: x1.2 4,620)**. Adding 850 to scenario 1(c) results in a requirement of **4,227 (Draft NPPF: x1.2 5,072)**.
27. Similarly, to reflect the short term management of the Core Strategy shortfall and longer term management of the Local Plan backlog, 1/3 of the Local Plan backlog of 850 (283) could be added to the output of 2(a) or 1/3 of 730 (243) could be added to the output of 2(b). The results are very similar to those shown in paragraph 25 i.e. **3,800** and **4,650** or 1/3 of 850 (283) could be added to output of 2(c) giving a requirement of **4366 (Draft NPPF: x 1.2 5,239)**

Summary of Scenarios

** denotes housing requirement in excess of 5 Year Supply (SHLAA May 2011 3,346)

NPPF 5 Year housing requirement is not met in any scenarios

Scenario \ Variation	(a)	(b)	(c)
1	3011	3110	3377
2	3533**	3590**	4083**
3	3295	3355	3661**
4	4383**	4440**	4933**
Para 26	3850**	3850**	4227**
Para 27	3800**	3800**	4366**

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