

WBP
Five Year HLS Position
 13 Feb 2012

1 General

1.1. The draft SoCG prepared by BNES is too complex and this Statement is prepared as a rebuttal to its content.

1.2. Conventionally one would derive a five year requirement based on an adopted development plan figure. However, there is no such up to date figure for BNES and in particular, the Council cannot rely upon the following documents for this purpose:

- RPG10 – this covers the period to 2016 but there is no agreed figure for BNES
- Draft RSS – this has not progressed to adoption
- Local Plan – this only covers the period to 2011

1.3. In the circumstances, the optimum approach having regard to PPS3 (Para 33) is to use an up to date evidence base. We have therefore tested the 5yr HLS position based upon figures discussed at the Examination which include the BNES derived 12,100 technical housing need figure to be met in the period 2006 to 2026 (BNES 26 and ID/7) together with the findings' of the IPPR Trading's report prepared on behalf of the Duchy of Cornwall which identifies a need for 14,400 dwellings.

1.4. The Inspector is aware from evidence that all other figures (save for the submission draft CS and the Woodhead Report), put forward at the examination and set out in background papers were at or above the IPPR figure and comprise the following:

SoS Proposed SWRSS Changes	21,300 (1,065dpa)
SWRSS Panel's Report	18,800 (940dpa)
BANES SHMA (affordable need only)	16,940 (847dpa)
Draft South West RSS	15,500 (775dpa)
BANES Spatial Options 2009	15,500 (775dpa)
Baker Associates	14,500 (725dpa)
IPPR Trading	14,400 (720dpa)
ID/7, paragraph 2.8	12,100 (605dpa)
Woodhead Report	11,600 (580dpa)

1.5. Against the above background, the best case scenario in terms of the five year housing land supply position, as far as the Council is concerned, is as follows:

2 Scenario A: Residualising the Requirement

2.1. This scenario takes the shortfall in supply from the first five years of the plan period (2006 to 2011) and residualises it over the remainder of the plan period 2011 to 2026. Based upon the components of supply said to be "deliverable" by the LPA, this results in the following five year supply position:

Requirement 2006 to 2026	BNES 12,100 (605dpa)	IPPR 14,400 (720dpa)
Completions 2006 to 2011	1,967	1,967
Residual Req. 2011 to 2026	10,133 (675pa)	12,433 (829pa)
Five Year Req. 2011 to 2016	3,375	4,145
LPA Identified 5yr Supply	3,346	3,346
Shortfall/Surplus	-29	-799

- 2.2. The above assessment results in a shortfall even using the BNES supply data in the five year HLS position when assessed against the technical figure (BNES 26 and ID/7), with a greater shortfall identified against the IPPR figure.
- 2.3. The Inspector will be aware of the misgivings about the true availability of all of the sites relied upon by the LPA to be delivered in the five year period to 2016, especially on the Western Riverside including having regard to constraints such as land ownership and the necessary relocation of the gas holders. We have made separate submissions arguing that student housing should not contribute to the total supply figure.

3 Scenario B: Meeting the Shortfall in the first Five Years

- 3.1. Completions in the first five years of the plan period (2006 to 2011) have totalled 1,967 dwellings, equivalent to 393 dwellings per annum. This is significantly below the 605 dwellings per annum implied by the 12,100 requirement (605 dwellings per annum) or the 720dpa implied by the IPPR requirement. The shortfall in the first five years is equivalent to 1,058 dwellings against the implied technical requirement (605dpa) and 1,633 against the IPPR requirement.
- 3.2. Progress on housing delivery in the first five years of the plan period has been significantly lower than expected. Accordingly, there is a strong justification for attempting to remedy the shortfall in the short to medium, term rather than over the plan period as a whole. This approach was accepted recently in a S78 SoS appeal case in Test Valley (appeal ref: APP/X3025/A/10/214096) (June 2011).

Requirement 2006 to 2026	BNES 12,100 (605dpa)	IPPR 14,400 (720dpa)
Annualised Req.	605dpa	720dpa
Req. 2006 to 2011 (5yrs)	3,025	3,600
Completions 2006 to 2011	1,967	1,967
Shortfall 2006 to 2011	1,058	1,633
Req. 2011 to 2016	3,025 (5 x 605)	3,600 (720 x 5)
Add the pre 2011 shortfall	+1,058	+1,633
Total Req. 2011 to 2016	4,083	5,233
LPA Identified 5yr Supply	3,346	3,346
Shortfall/Surplus	-737	-1,887

- 3.3. The above assessment results in a 737 shortfall against the technical requirement in the period 2011 to 2016 and a 1,887 shortfall against the IPPR requirement.

4 Summary

- 4.1. The examples show that BNES is unable to demonstrate a deliverable five year supply of housing land against either of the above scenarios.
- 4.2. There remains the issue about the delivery or otherwise of the Council's 3,346 supply figure which includes, inter alia, reliance upon delivery from the Riverside sites. However, and for the reasons set out at the Examination, there remains considerable doubt as to the ability of these sites (and other components of supply relied upon by the Council) to be delivered within the five year period to 2016 and therefore count towards the 3,346 supply figure.
- 4.3. As regards to the 872 dwelling shortfall for the pre 2006 period, we consider this to be a significant issue as it reflects the long term failure of the Council to meet long term housing needs/requirements and although we have not included this shortfall in our assessment of the five year HLS position, the 872 dwelling shortfall in the pre 2006 period does give weight to the need to address the housing supply issues as early as possible in the plan period up to 2016.
- 4.4. We have submitted a separate statement in response to BNES31 and the issue of student housing. For the reasons set out in our separate statement, we do not consider student housing should be counted as part of the supply and even if it does it fails to address the pre 2006 shortfall.

Signed:  for Deputy of Cornwall
Date: 13/2/12
