

To: Simon Emerson, Inspector  
Chris Banks, Programme Officer  
From: Sawyer Associates Limited.

3<sup>rd</sup> May 2012

**ID/27 Inspectors Note – 30 March 2012 (NPPF)**

- 1.1. As Sawyer Associates, 50% owners of Ashlar Group Limited and Wedco Limited, we make this submission in response to ID/27 and the questions raised by the inspector relating to the impact of the NPPF on the BNES emerging Core Strategy.
- 1.2. We have previously made submissions relating to housing supply in the rural areas, particularly in relation to the local need for affordable housing (260/1 and 0260).
2. **‘Whether the NPPF significantly changes national policy in relation to the approach to assessing the housing requirement in a Local Plan?’**
  - 2.1. **Paragraph 47, bullet point one** places a duty on local authorities to ensure their local plan meets the ‘full objectively assessed needs for market and affordable housing in the housing market area’.
  - 2.2. It is our contention that this goes beyond the obligations contained in PPS3 para 33 in relation to local plan development, which directs only that LPA’s should ‘take into account’ various external assessments of need.
  - 2.3. During the Inspector’s hearing on Issue 2 on the 17<sup>th</sup> of January; BNES argued that there was no duty placed upon the council, to rely on or be bound by, ONS projections regarding migration, homes/jobs ratio and, in effect, sought to disaggregate various national projections and then reassemble the data to justify the proposed Core Strategy targets for housing in particular.
  - 2.4. My notes record the inspector as commenting on one occasion during that part of the hearing that BNES targets.
  - 2.5. ‘You have come to a conclusion that may be justifiable, but you have not justified it.’
  - 2.6. Arguably **para 47 bullet point one** does change national policy by obliging LPAs to plan for the full market and affordable need.
  - 2.7. During the Inspector’s hearing on Issue 2 on the 17<sup>th</sup> of January in relation to the proposed quantum of affordable housing, BNES argued that a target of 3000 affordable homes over 16 years against a projected locally generated increase in need of 6,000 homes was an ambitious target and was justifiable based on a 0% net migration ‘run’ in 2006.
  - 2.8. We have included, as Appendix A to this report, an analysis of the likely housing need in BNES Rural Areas (by Pioneer Housing and Development Consultants). This makes the point, on page 3 at paragraph 4.3. that, even if nil migration is assumed, around 1,400 additional homes are needed in respect of the BNES Rural Areas against BNES proposed 800. Furthermore, if employment growth is to be prevented from decline (ie a nil employment growth scenario) in the BNES Rural Areas, an additional 2,400 - 2,600 homes are needed (Appendix A page 3 paragraph 4.2).
  - 2.9. Also, in relation to housing provision in rural areas the NPPF reinstates the duty to co-operate with neighbouring authorities in rural areas in **NPPF paragraph 54**.
  - 2.10. During the Inspector’s hearing on the 18<sup>th</sup> of January the Inspector eventually concluded (my notes record) that he felt that he had no legitimate authority to reopen the issue of the adequacy of cross border consultation in the absence of the Regional Spatial Strategy.
  - 2.11. It is our contention that the **NPPF paragraph 54** does change national policy in relation to the need for cross border consultation regarding housing provision in the BNES Rural Areas and to do so prior to concluding the Core Strategy planning process.

- 3. Whether the new requirement for a 20% buffer in the 5 year land supply where there has been a record of persistent under delivery (NPPF, paragraph 47, 2<sup>nd</sup> bullet) should apply to Bath and North East Somerset (in the light of the evidence already submitted on past performance).**
- 3.1. We contend that BNEs should be obliged to provide for a 20% buffer in the five year land supply in the light of all the arguments already submitted in 'BNES/32 Draft SoCG on Local Plan Backlog, Core Strategy Shortfall, General Conformity with RPG10 and calculating the 5 year Housing Land Supply Requirement', to which we contributed as Ashlar Group Limited. This detailed a backlog to 2006 and a shortfall 2006-11 which, when combined, amount to an under delivery of 1,634 homes over the period to 2011. The more succinct analysis by Woolf Bond (rep222/006) provides further evidence of a persistent track record of under delivery.
- 3.2. Looking to the period to 2016 and BNES proposed five year land supply, it is our contention that this record of under delivery will continue at a similar rate.
- 3.3. There are significant doubts over the deliverability of the larger sites which underpin BNES projected five year land supply. These comprise:
- Bath Western Riverside – 401 homes proposed 2011-16
  - South West Keynsham (Western) – 150 homes proposed 2011-16
  - Somersdale – 150 homes proposed 2011-16
  - Polestar Purnell, Paulton – 506 homes proposed 2011-16
- 3.4. We deal with each of these in turn below.
- 3.5. *Bath Western Riverside.* Assuming that the current phase of development of 299 homes is deliverable in the period to 2016 seems reasonable. But the start of a second phase of development, 'Remainder of Crest OPA.1' is earmarked to commence in 2015/16. It is dependent on removal of the remaining gas tower. In this context, it seems unlikely that 80 dwellings will be completed in 2016 and therefore 80 homes are unlikely to be delivered.
- 3.6. *South West Keynsham.* We understand that this site is now owned by Taylor Wimpey. Planning permission for 285 homes was granted at appeal in June 2011. Given the lead in time to achieving planning consent, completion of 150 homes by 2016 seems tight. We have however left this in the trajectory at this stage.
- 3.7. *Somersdale.* Given the lead in time to achieving planning consent including consultation requirements, we assume that completions are not achieved until 2014/15. 50 completions a year is considered feasible. On this basis, we have revised down delivery within the period to 2016 to 100 dwellings.
- 3.8. *Polestar Purnell* The housing trajectory assumes 506 homes can be delivered to 2016 which seems unrealistic. The settlement has a population of less than 3,000. Given market conditions it seems more reasonable to assume delivery of 50 homes a year. On this basis we have reprogrammed the trajectory and assume delivery of 230 homes to 2016; a shortfall of 276 homes.
- 3.9. In the light of BNES past track record and the uncertainty over the deliverability of some of the larger sites within a five year period it is our contention that BNES should be obliged to provide for a 20% buffer.
- 4. Whether an allowance can be made for windfall sites can should be made for windfall sites in the five year land supply (NPPF, paragraph 48) and whether any such allowance should be included in the supply for years 16-15.**

- 4.1. In relation to this question it is our contention that windfall sites should only be taken into consideration, where reasonably likely to deliver some affordable component, given the requirement of NPPF paragraph 47 for authorities to plan to meet both market and affordable need for the plan period. Historically windfall sites have typically been of insufficient size to deliver affordable homes. Accordingly, based on historic delivery, BNES should be able to include a provision for windfall sites based only that proportion that delivered an affordable component.

## **APPENDIX A – ADDITIONAL MATERIAL ON RURAL HOUSING REQUIREMENTS.**

**24<sup>th</sup> January 2012**

### **BANES Rural Housing Requirements**

#### **Estimating housing requirements in Rural Areas of BANES**

##### **1.0 Introduction**

- 1.1 In July 2011, a number of projections were run as part of the preparation of a Housing Statement prepared on behalf of Somer Community Housing Trust (11/04300/OUT). These projections were to assist in identifying likely housing requirements in Bath and north East Somerset (BANES), with a key focus upon the ward of Clutton.
- 1.2 Further to this work a series of linked projections have been prepared looking at likely requirements in all rural areas of the District. In defining rural areas we have grouped information from 13 different wards; these are:

- Bathavon North
- Bathavon South
- Bathavon West
- Chew Valley North
- Chew Valley South
- Clutton
- Farmborough
- High Littleton
- Mendip
- Paulton
- Peasedown
- Publow and Whitchurch
- Timsbury

The selected wards broadly align with the rural areas depicted on Diagram 18 of the draft Core Strategy (December 2010).

##### **2.0 Methodology**

- 2.1 The methodology employed is the same as in the original work for the Somer Community

Housing Trust Housing Statement in July 2011 and is based around establishing fertility, mortality and migration patterns and running a number of projections based on different levels of migration. Linked to these projections are associated estimates of the likely number of people in employment and also the number of households (which in turn is used to estimate housing requirements).

- 2.2 Where possible local level data is used to provide reasonable estimates for smaller areas, this includes looking at ward level employment and headship rates (and adjusting these to be consistent with figures for the whole of BANES). Migration patterns are also adjusted from District-level data to take account of different age structures and the migration patterns of students who predominantly impact on population figures for the Bath City area.
- 2.3 The following projections differ from those previously produced in July 2011 in that they look at the period from 2011 to 2026 (rather than to 2031). This only makes a small difference when making comparisons on an annual basis. A full rationale behind the projections run is contained within the aforementioned previous work. In total 4 different projections have been carried out and these can be summarised as:

- PROJ 1 (R) – Medium/Long-term trend based projection
- PROJ 2 (R) – Short/Medium-term trend based projection
- PROJ 3 (R) – Zero net migration
- PROJ 4 (R) – Zero employment growth

### **3.0 Baseline Population**

- 3.1 As with the Council area-wide projections the analysis for the Rural areas takes a baseline of mid-2011. The ONS mid-year ward projections for 2006 are utilised and rolled forwards on the basis of reasonable assumptions for a further five years – the projections following this are for five year periods.
- 3.2 Below a comparison is provided of the baseline population figures for Rural areas and the whole of BANES. The data shows that in 2011 Rural areas had a slightly older population profile with a higher proportion of people in all age groups from 45 and above. The key difference however is in the 15-29 age band with an estimated 16.0% of Rural residents in this band compared with 25.3% across the whole of the Council area – this difference is largely due to the high number of students in other parts of the local authority area (and in particular the main urban centre of Bath).

<b>Comparison of population profile in Rural areas and whole of BANES (2011)</b>				
Age group	Rural areas		BANES	
	Population	% of population	Population	% of population
Under 15	7,231	16.1%	27,850	15.3%
15-29	7,184	16.0%	46,044	25.3%
30-44	7,825	17.4%	31,764	17.4%
45-59	9,997	22.2%	33,882	18.6%
60-74	8,105	18.0%	26,192	14.4%
75+	4,640	10.3%	16,581	9.1%
Total	44,981	100.0%	182,313	100.0%

#### 4.0 Summary of outputs

- 4.1 The tables below show a summary of the findings for Rural areas in the period from 2011 to 2026. The first table looks at population and employment change (along with associated housing requirements) for the whole of the 15-year period with the second table showing the same figures on an annual basis.
- 4.2 The data shows that under trend-based assumptions a dwelling requirement over fifteen years of between 2,400 and 2,600 additional units (160-174 per annum) would be observed. This would provide a moderate growth in population, but no real change in the number of people living locally who are working.
- 4.3 If there were no net migration (i.e. Rural areas were just meeting the requirements arising from natural change) the dwelling requirement would drop to around 1,400 over 15-years (94 per annum). This scenario however sees a 7.3% drop in the working population. To maintain a stable workforce would see requirements close to trend based levels with an annual requirement for around 172 additional dwellings.

<b>Summary of projections 2011 to 2026 – total – Rural Areas</b>						
Projection	Population growth		Housing numbers		Employment growth	
	Total	% change	Total	% change	Total	% change
PROJ 1 (C) (10-year trends)	834	1.9%	2,402	12.4%	-252	-1.1%
PROJ 2 (C) (5-year trends)	1,305	2.9%	2,608	13.4%	39	0.2%
PROJ 3 (C) (zero net-migration)	-1,432	-3.2%	1,407	7.3%	-1,652	-7.3%
PROJ 4 (C) (zero employment growth)	1,248	2.8%	2,583	13.3%	0	0.0%

Summary of projections 2011 to 2026 – annual – Rural Areas						
Projection	Population growth		Housing numbers		Employment growth	
	Per annum	% change	Per annum	% change	Per annum	% change
PROJ 1 (C) (10-year trends)	56	0.1%	160	0.8%	-17	-0.1%
PROJ 2 (C) (5-year trends)	87	0.2%	174	0.9%	3	0.0%
PROJ 3 (C) (zero net-migration)	-95	-0.2%	94	0.5%	-110	-0.5%
PROJ 4 (C) (zero employment growth)	83	0.2%	172	0.9%	0	0.0%

## 5.0 Conclusions

- 5.1 It is understood that the Council is proposing housing numbers in rural areas at around 800 dwellings over 15 years (or just over 53 per annum).
- 5.2 The above analysis suggests that this figure is too low with the zero net migration model putting the figure at around 1,400 homes (i.e. 94 per annum). If this lower figure is accepted it will result in a dramatic fall in the number of people who are working given the ageing population (which will have a particular impact on the Rural areas).
- 5.3 In the BANES Rural areas, maintaining a base of people in employment would seem to be a reasonable bottom-line basis for setting targets moving forward. At a local level this is important as those who are working are more likely to be investing money in the local economy and therefore supporting key local services including shops and local employment centres.
- 5.4 To maintain the current level of employment in the Rural areas (i.e. nil employment growth / decline) the above modelling suggests that over 2,500 additional homes (i.e. 172 per annum) would be required between 2011 to 2026. Whilst the modelling suggests that this will not result in additional employment growth, it would at least maintain the current level of employment. To see a very modest level of employment growth (i.e. 0.2%) over this period would require over 2,600 additional homes (i.e. 174 per annum) to be provided in the Rural areas.

## Projection for Clutton and environs

1.1 In addition to running the four projections for rural areas in BANES additional modelling has also been undertaken to look at housing requirements for Clutton and the adjoining wards (plus the ward of Timsbury). The full list of wards used for this analysis are:

- Chew Valley North
- Chew Valley South
- Clutton
- Farmborough
- High Littleton
- Mendip
- Publow and Whitchurch
- Timsbury

1.2 The tables below summarise results for this smaller area. In the case of the Clutton Environs area it is apparent that the trend-based projections tend to show lower levels of population growth (negative in the case of 10-year trends) and lower housing requirements when compared with the analysis for all Rural areas.

1.3 The zero net migration projection also shows a lower housing requirement (in proportionate terms) but a noticeably higher drop in the number of people in employment. To achieve zero employment growth would require an increase in the number of dwellings of around 13.8% over the fifteen year period – close to the figure for all rural areas of 13.3%

<b>Summary of projections 2011 to 2026 – total – Clutton Environs</b>						
Projection	Population growth		Housing numbers		Employment growth	
	Total	% change	Total	% change	Total	% change
PROJ 1 (C) (10-year trends)	-117	-0.6%	746	8.6%	-649	-6.2%
PROJ 2 (C) (5-year trends)	45	0.2%	814	9.4%	-549	-5.3%
PROJ 3 (C) (zero net-migration)	-896	-4.4%	416	4.8%	-1,133	-10.9%
PROJ 4 (C) (zero employment growth)	933	4.5%	1,192	13.8%	0	0.0%

<b>Summary of projections 2011 to 2026 – annual – Clutton Environs</b>						
Projection	Population growth		Housing numbers		Employment growth	
	Per annum	% change	Per annum	% change	Per annum	% change
PROJ 1 (C) (10-year trends)	-8	0.0%	50	0.6%	-43	-0.4%
PROJ 2 (C) (5-year trends)	3	0.0%	54	0.6%	-37	-0.4%
PROJ 3 (C) (zero net-migration)	-60	-0.3%	28	0.3%	-76	-0.7%
PROJ 4 (C) (zero employment growth)	62	0.3%	79	0.9%	0	0.0%

### Appendix 3



## Updating projections for Clutton and BANES

- 1.1 The original work undertaken in respect of the Housing Statement prepared on behalf of Somer Community Housing Trust looked at a projection period from 2011 to 2031.
- 1.2 The following tables provide a summary of housing requirements for both Clutton (ward) and BANES as a whole for the period from 2011 to 2026. Additional commentary is not provided, and the original Housing Statement provides relevant information in respect of methodology. Although the figures differ slightly from those previously prepared this is due mainly to the final part of the original projection (2026 to 2031) having a greater emphasis on the ageing population. Overall however the differences are not significant.

### **Clutton**

<b>Summary of projections 2011 to 2026 – total – Clutton</b>						
Projection	Population growth		Housing numbers		Employment growth	
	Total	% change	Total	% change	Total	% change
PROJ 1 (C) (10-year trends)	14	0.5%	125	11.6%	-24	-1.8%
PROJ 2 (C) (5-year trends)	37	1.5%	135	12.5%	-9	-0.7%
PROJ 3 (C) (zero net-migration)	-97	-3.8%	77	7.1%	-95	-7.1%
PROJ 4 (C) (zero employment growth)	50	2.0%	141	13.0%	0	0.0%

<b>Summary of projections 2011 to 2026 – annual – Clutton</b>						
Projection	Population growth		Housing numbers		Employment growth	
	Per annum	% change	Per annum	% change	Per annum	% change
PROJ 1 (C) (10-year trends)	1	0.0%	8	0.8%	-2	-0.1%
PROJ 2 (C) (5-year trends)	2	0.1%	9	0.8%	-1	0.0%
PROJ 3 (C) (zero net-migration)	-6	-0.3%	5	0.5%	-6	-0.5%
PROJ 4 (C) (zero employment growth)	3	0.1%	9	0.9%	0	0.0%

### **BANES**

<b>Summary of projections 2011 to 2026 – total – BANES</b>						
Projection	Population growth		Housing numbers		Employment growth	
	Total	% change	Total	% change	Total	% change
PROJ 1 (C) (10-year trends)	21,317	11.7%	12,797	16.3%	9,926	10.9%
PROJ 2 (C) (5-year trends)	24,860	13.6%	14,350	18.3%	12,112	13.3%
PROJ 3 (C) (zero net-migration)	4,247	2.3%	5,315	6.8%	-608	-0.7%
PROJ 4 (C) (zero employment growth)	5,231	2.9%	5,746	7.3%	0	0.0%

**Summary of projections 2011 to 2026 – annual – BANES**

Projection	Population growth		Housing numbers		Employment growth	
	Per annum	% change	Per annum	% change	Per annum	% change
PROJ 1 (C) (10-year trends)	1,421	0.8%	853	1.1%	662	0.7%
PROJ 2 (C) (5-year trends)	1,657	0.9%	957	1.2%	807	0.9%
PROJ 3 (C) (zero net-migration)	283	0.2%	354	0.5%	-41	0.0%
PROJ 4 (C) (zero employment growth)	349	0.2%	383	0.5%	0	0.0%