

# B&NES Core Strategy Examination

## Comments on BNES/56

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We welcome the opportunity to comment upon the suggested wording changes in Appendix 1 of BNES/56. On the whole we support the principle of the change very strongly. The proposed disaggregation of the market and affordable housing supply, which had been previously promoted by the Council, would have been simply unworkable in practice.

Notwithstanding we do have comments on the detail of the changes proposed. There are four separate aspects which causes us concern. These relate to the following:

- i. Scale and location of growth;
- ii. Table 1C – Spatial distribution of the housing requirement;
- iii. Review mechanism; and
- iv. Monitoring.

These aspects are now addressed in turn. Following this, attached at Appendix A are our proposed changes to those aspects of the Plan where we consider it is necessary to further modify the text proposed by the Council.

### **Scale and location of growth**

We can see that the Council has proposed changes to paragraphs 1.26a and 1.26b with the intention of clarifying the relationship between the objectively assessed housing need and the housing requirement. For the reasons we rehearsed at the Examination, we maintain our objection to the objectively assessed need calculation and thus the figure of 'about 10,000 dwellings' contained in paragraph 1.26a.

Notwithstanding whether the figure is correct, the reference to both the 10,000 dwelling and 13,000 dwelling figures in the plan is not necessary and, despite the proposed changes to the supporting justification, could cause uncertainty and confusion, particularly for those who were not participants in the Examination process.

The evidence that informed the housing requirement and the policies which then

subsequently flow from that evidence are two separate matters. The evidence is necessary to inform the preparation of the plan and the Examination process, however, once the evidence has been tested and the plan is adopted, that evidence can be set to one side. What matters, and what it is important to be absolutely clear about in the plan is the 'housing requirement' which the authority will seek to deliver throughout the plan period and upon which it will be required to maintain a five year supply.

For these reasons, it is our view that the supporting text under the 'scale and location of growth' heading can be simplified to make clear that the housing requirement for the plan period is 13,000 dwellings and reference to the 10,000 dwelling figure should be deleted. This would involve deletion of Table 1, which it is no longer necessary to include in the Plan, and the second and third sentences of paragraph 1.26b.

The clarification in the fourth and fifth sentences of paragraph 1.26b are however supported as these make it clear to applicants, decision makers and other interested parties that the 13,000 dwelling housing requirement represents the basis for maintaining a five year housing land supply.

Paragraph 1.26c deals with economic growth aspirations. The target set in the paragraph is the delivery of around 10,300 new jobs during the plan period. For clarification, and to avoid any future uncertainty, it would be preferable to refer to a net increase in the number of jobs.

Notwithstanding the above, as discussed at the hearing sessions, the 13,000 dwelling figure should not in our view represent a cap or limit to development. To do so would be inconsistent with the NPPF and unnecessarily restrict housing delivery. Similar to many other local plans, we consider the requirement figure should be expressed as a minimum, 'at least' figure. This would ensure consistency with the statement in paragraph 1.26b that the 13,000 figure is not a cap.

### **Table 1C – Spatial distribution of the housing requirement**

We agree that it is important to incorporate within the early sections of the plan a summary of the spatial distribution of the housing requirement. The benefits however of disaggregating this between market and affordable housing are unclear and it is, in our view, potentially misleading to do so.

The affordable housing figures contained within the Table are not a representation of the

need for affordable housing in the different spatial locations but instead appear to represent the anticipated supply. Given that the overall approach to disaggregation has been removed, the figures in the second and third columns of Table 1c are not necessary and could potentially cause confusion. We therefore recommend that these two columns are deleted from the Table. The Table would simply therefore provide the spatial distribution of the overall 13,000 dwelling requirement.

We note that the Council does not propose any changes to paragraph 1.26d. One change that we consider would be very helpful is to change the reference in this paragraph from Table 1B to Table 1C, as it is the latter which contains the spatial distribution and better reflects the content of the paragraph.

### **Review mechanism**

The area of proposed change to the plan which causes us greatest concern is paragraph 1.36. We note that the Council has not proposed any changes to the final sentence of this paragraph which addresses the review mechanism and procedure, however, this is a matter which was discussed in some detail at the hearing sessions.

For the reasons we and others explained at the Examination, in light of the proposed housing market area and the forthcoming West of England wide Strategic Housing Market Assessment, it is imperative that a transparent and robust review mechanism is incorporated into the plan to ensure that the understanding of the housing requirement based upon the needs of the Gold Standard HMA are properly planned for and addressed in a replacement for the Core Strategy.

It is our view that the Council should not just review, but should commit to re-entering the plan-making process alongside the other authorities within the West of England area. It is only through such a commitment that there can be sufficient certainty that the overall housing needs for the West of England area will be delivered in the most appropriate the sustainable manner.

### **Monitoring**

In accordance with our suggested changes above, we recommend that the reference to “around” 13,000 dwellings in Table 9 is replaced with “at least” 13,000 dwellings.

In addition, we see no particular benefit to monitoring the delivery of the affordable housing

on each of the strategic sites. It is not clear what this would achieve or how it would help form policy making in the future. What is of most importance and potential influence in the future is the overall scale of affordable housing delivery. We recommend that the “Target” column of Table 9 is therefore amended to refer simply to the overall split between market and affordable housing.

## Appendix A

### Proposed Wording for Paragraphs 1.26 & 1.36 and Policy DW1

#### 1.26 *Scale and location of growth:*

~~1.26a~~ The objectively assessed need for housing and the requirements of the plan are 8,727 is about 10,000 dwellings which includes comprising 5,437 6,832 market homes and 3,290 affordable homes (Table 1A below). It is these figures against which the implementation of the plan will be monitored. A five year land supply of specific deliverable sites will be maintained against this disaggregated District-wide requirement for both market and affordable housing. In order to meet the economic growth aspirations, the strategy also needs to enable the delivery of around 10,300 new jobs.

#### ~~Table 1A – Housing Requirements Objectively assessed need for housing~~

*[Delete Table]*

~~1.26b~~ The supply of market and total housing that will be delivered (See Table 1B) is significantly greater than objectively assessed requirements. This is because the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement.

~~1.26b~~ However, ~~t~~the housing requirement figure of the Plan is about at least 13,000 (Table 1B). The supply of market housing has been increased to enable to enable the delivery of the assessed need for affordable housing. This is necessary as much of the supply of market housing (built and committed) will not yield affordable housing, and, the small site windfall allowance is not expected yield any affordable housing. It is against the Plans

housing requirement figure of 13,000 that a five-year supply of housing will be maintained. 13,000 is not a cap on housing. For example, it may prove to be the case that additional previously developed windfall sites come forward for development or that the small sites windfall allowance can be exceeded.

Table 1B – Housing ~~Land Supply~~ Requirement

	Total Housing Delivery
Market Housing	9,646
Affordable Housing	3,290
Total Housing	12,956

**1.26c** In order to meet the economic growth aspirations, the Plan also enables the delivery of ~~around at least~~ 10,300 ~~net~~ new jobs.

~~**1.26c** This does not mean that all 12,956 homes are needed to deliver all 3,290 affordable homes. Much of the supply of market housing is on sites that will not yield any affordable housing. This reinforces the justification for identifying a 5 year land supply of specific deliverable sites against the disaggregated requirements for market and affordable housing.~~

~~**1.26d** The Core Strategy makes provision for around 12,700 new homes and around 40,170 new jobs. The spatial distribution of housing across the District is set out in the Key Diagram and summarised in Table 4B 1C below. The strategy is to locate new development in the most sustainable locations and the priority is to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger settlements in the Somer Valley. However, in order to make provision for housing and employment needs and to fulfil the objectives of the Core Strategy, some greenfield land is also required. In some instances this entails the release of land from the Green Belt because these are the most sustainable locations. The identification of land for development has sought to minimise the impact on the environment and the harm to the Green Belt and take as well as taking account of infrastructure requirements. The Council has therefore sought to make provision for level of development likely to be needed but it is acknowledged that the district's environmental quality provides a challenge for accommodating new development. The broad spatial principles are summarised below and elaborated in the place-based chapters 2-5.~~

**Table 1C – spatial distribution of the housing requirement**

	<b>Market Housing</b>	<b>Affordable Housing</b>	<b>Total Housing</b>
Bath	5,130	1,890	7,020
Keynsham	1,580	570	2,150
Somer Valley	1,870	600	2,470
Rural Areas	930	190	1,120
Whitchurch Green Belt	140	60	200
<b>Total</b>	<b>9,650</b>	<b>3,310</b>	<b>12,960</b>

Actual supply figures in November 2013 SHLAA trajectory have been rounded to the nearest 10

**Paragraph 1.36**

**1.36 Flexibility:** The Core strategy recognises the need to be responsive in light of future uncertainty and unforeseen circumstances. The spatial strategy therefore enables the identification of a 5 year land supply initially with a 20% buffer to reflect previous under delivery. The required buffer may reduce to 5% subject to performance. The level of housing being planned for also provides significant flexibility and choice of sites. The Council will monitor delivery rates in the plan period which will shape the first review of the Core Strategy programmed for around 2016 to co-ordinate with the other West of England districts. The review of the Core Strategy is necessary to ensure that the housing needs of the wider strategic housing market area are addressed in the most sustainable manner. It will therefore be necessary to commence the review and re-engage the plan-making process immediately on receipt of the West of England SHMA.

**Policy DW1**

POLICY DW1 District-wide spatial Strategy

The overarching strategy for B&NES is to promote sustainable development by:

- 1: *[no further change]*
- 2: making provision to accommodate;

a. a net increase of 10,300 jobs;

b. an increase in the supply of housing by ~~around~~ at least 13,000 homes

~~the objectively assessed requirements for homes, including affordable homes, for the Plan period (2011 to 2029), as set out in the table below; and.~~

~~Total Housing Requirement~~

~~Market housing 5,437~~

~~Affordable housing 3,290~~

~~Total housing 8,727~~

~~c. an increase in the total housing supply to around 13,000 homes to enable the delivery of the affordable housing requirement.~~

3: - 9: *[no further change]*