

**Issue 2: Is the spatial strategy for the delivery of housing and jobs justified and are there reasonable prospects for delivery consistent with national advice?**

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- 1) The comments below set out our position in respect of the following 'Issue 2' matters that RPS is appearing at examination to consider:
- **The SHLAA (General)**
  - **Sub Matter: Keynsham**
  - **Sub Matter: Somer Valley**

**SHLAA**

- 2) RPS has repeatedly emphasised that the Council's approach to determining and identifying housing land supply is inconsistent with national planning policy and the SHLAA epitomises the ill-informed and conflicting nature 'justifying' the CS.
- 3) Rather than an independent assessment of the sites based upon their availability, suitability and achievability at a certain point in time as promoted in national policy, it is submitted that the SHLAA is based on a pre-determined strategy and only identifies sufficient sites to meet the Core Strategy housing target.
- 4) The SHLAA is a live document that is meant to provide an indication of available land at a certain snapshot of time. If that quantum of available land is available at the date of SHLAA publication in May 2011, then it follows that other sites are likely to become available during the remainder of the plan period and as the SHLAA is periodically updated. Paragraph 1.9 correctly confirms that 'additional suitable sites may yet come forward as part of the ongoing updating process.
- 5) The SHLAA sends conflicting messages seeking to cap the number and spatial distribution of sites assessed based on the Core Strategy housing target of 11,000 homes; it cannot therefore be considered a thorough assessment. The fact that it has not properly assessed the potential of the Green Belt sites undermines overall credibility and the ability for the CS to respond.
- 6) Paragraph 2.1 of the SHLAA confirms that the submission Core Strategy plans for 11,000 homes against an identified requirement for 11,600 homes (later identified in Topic Paper 9 as 12,100 homes). The conclusion in the SHLAA confirms that windfall delivery rates have been increasing 'in relation to the demand for housing and return from investment ...' thereby suggesting that there is considerable demand for housing and dispelling TP9's theory that the housing land shortfall against the B&NES Local Plan requirements had disappeared. Despite the Core Strategy being based on projected pessimistic economic outlook over the lifetime of the plan, paragraph 4.3 of the SHLAA projects that the level of housing delivery will 'pick up' during the next 5 year period to catch up with the annualised requirement; in direct contrast to the Core Strategy which predicts housing delivery rates to remain at recessionary levels across the plan period.
- 7) The high level of inconsistency between the SHLAA and the Core Strategy in relation to growth projections draws into question the credibility of the housing growth targets being advanced by the CS. It is apparent that the SHLAA frames the CS housing requirement figure

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of 11,000, artificially giving the appearance that the Council has a healthy land supply position. The credibility of the SHLAA is undermined in paragraph 2.28 where the document concedes that the Core Strategy will be under providing against its housing requirements but still fails to assess sites in the Green Belt against the availability, achievability and suitability criteria as a comprehensive SHLAA should.

- 8) There is a danger that the SHLAA is the overriding piece of evidence used by B&NES to establish the housing requirement. PPS3 paragraph 33 clearly acknowledges the role that the SHLAA has in that process, however, it is only one aspect of all the various sources of evidence required to be assessed to arrive at a conclusion. The obvious implication is that all other evidence prepared by the Council is predicated on the known supply position.
- 9) Hicks Gate is discussed in paragraph 2.28 where it is acknowledged that the site is identified within the Bristol Core Strategy (Policy BC5) as a contingency site but it dismisses the potential of the site based on the pre-conceptions in the Core Strategy and without assessing its suitability, achievability and availability. The SHLAA therefore presupposes that the CS is sound (underlying the principle that it should have been prepared independently, and in advance of the CS).
- 10) Overall the SHLAA is not an objective evidence base document but an assessment that does little but supplement seeking to justify a low growth stance and ensure no amendments to the Green Belt Boundary is required.
- 11) On the related issue of the 15 year plan period then RPS endorses the point raised by the Inspector in paragraph 3.4 of ID7 in respect of the Council being required to illustrate at least 15 years housing land supply. This is a basic requirement of paragraph 53 of PPS3.
- 12) Neither the SHLAA nor the Core Strategy is sufficiently flexible to facilitate the identification of at least another year of housing land supply. Even against the 11,000 homes target this is another 500 homes; the CS ducks the issue because acknowledging it would prompt the need for strategic Green Belt releases given the lack of available alternatives. There is no guarantee that the Core Strategy will be adopted by the end of 2012 which would suggest that a minimum additional two years of housing land supply may be required just to meet the 15 year requirement.
- 13) The identification of the required additional housing land supply leaves little option but to review undertake a full Green Belt assessment. Please refer to our previous representations and our position statement in respect of Issues 1 and 3 for further discussion on the Green Belt and the urgent requirement to identify Hicks Gate as a strategic housing allocation.

**Issue 2 Sub Matter: Keynsham**

- 14) The Core Strategy provides for 1,500 homes and 1,500 additional jobs at Keynsham. RPS does not object to the Council's intentions for economic growth at Keynsham however it is regrettable that the Council does not adopt a similarly positive and proportionate approach to growth in other parts of the District particularly at Bath and Bristol. This results in a clear imbalance in the spatial distribution of growth across the district which undermines the sustainability credentials of the Core Strategy.

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- 15) It is admirable that the Council bases its decision to allocate high levels of growth at Keynsham on a number of considerations including ensuring that there is less overall commuting. However this utopian view departs from reality as acknowledged in the Core Strategy's spatial strategy which states that Keynsham 'currently experiences significant in and out-commuting'. The high level of interaction between the Bristol Urban Area and Keynsham was also acknowledged in the 2009 Sustainability Appraisal:

*"The Hicks Gate area may present greater opportunities to provide employment development and could potentially provide jobs that are accessible to residents of Keynsham"*<sup>1</sup>

- 16) Having regard to the above, it would be a uniquely ambitious view to take that over the plan period, sufficient rates of economic development would be achieved at locations such as Keynsham such that the need for growth on the edge of Bristol and the need for people in Keynsham to commute to the City subsides.
- 17) RPS questions the delivery of 1,500 jobs and associated homes at Keynsham having regard to the recent closure of the Somerdale Factory and the town's reliance on public sector employment. The potential time-lag in delivering economic growth in Keynsham is likely to result in displaced workers from Somerdale finding alternative employment in Bristol and Bath. This coupled with the allocation of high levels housing at Keynsham will not prevent but will almost certainly increase levels of out-commuting; the opposite to what the Core Strategy is seeking to achieve.
- 18) RPS has repeatedly questioned the potential effectiveness of the Core Strategy policies in reducing the level of commuting, such as allocating high levels of growth at Keynsham. If the Council is committed to delivering more sustainable commuting patterns it needs to take a realistic view and provide additional housing adjoining Bristol; that is a genuine opportunity for reducing trips. Accordingly, Hicks Gate represents the most sustainable and appropriate option that would benefit sustainability and growth objectives of both B&NES and Bristol City; not least in providing job opportunities to Keynsham residents.

**Issue 2 Sub Matter: Somer Valley**

***Economic Development***

- 19) It is acknowledged that there the promotion of economic development and job creation in the Somer Valley is a valid objective, however, the justification and effectiveness associated with delivering an additional 1,000 jobs is not clear.
- 20) Although the Core Strategy seeks to secure more sustainable forms of development and commuting patterns, the dispersal of a significant portion of the district's total net additional jobs to outlying towns such as Midsomer Norton and Radstock and other rural villages cannot represent the most sustainable option when more sustainable locations adjoining Bristol are allocated nothing. The Core Strategy acknowledges the reduced public transport choice offered in the Somer Valley and yet it still seeks to focus significant levels of employment despite the high likelihood that such development will necessitate extensive travel by car and unsustainable commuting patterns. As per statements in respect of Keynsham above and the

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<sup>1</sup> Table A6, Appendix A Sustainability Appraisal (2009)

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overall strategy, it is naïve to promote a strategy of total self-containment whether it is in any given town or the district as a whole.

- 21) On a related note it is hypocritical of the Council to express doubts (via Topic Paper 9) in relation to the level of economic growth projected by the West of England LEP, and then make grand statements regarding the potential economic growth in the Somer Valley, not least where there are no delivery mechanisms in place.

***Housing***

- 22) RPS does not necessarily object to the pro-growth agenda being promoted in the Somer Valley. However if the overall growth of 11,000 homes across the district is to be pursued then the high allocation of housing development is disproportionate, unsustainable and wholly unjustified. The Council needs to adopt a holistic approach to growth across the entire district having regard to housing need and market forces. One cannot simply allocate high levels of growth to rural settlements within the Somer Valley in the hope that people wishing to live closer to Bristol or Bath will suddenly move to and work in the Somer Valley. At the very least people will move to the Somer Valley and subsequently commute to economic centres such as Bath and Bristol.
- 23) As discussed in greater detail in our previous representations on the Core Strategy Spatial Options Consultation, the housing allocation for the Somer Valley far exceeds the level of housing identified in the area in the previous versions of the draft RSS despite the Council now adopting a much lower district-wide housing target. This appears to conflict with the Core Strategy objective of reducing overall commuting levels and instead suggests that commuting levels will increase given the Somer Valley is a primarily rural area with limited public transport options.
- 24) It is a major concern that a total of 2,700 homes have been allocated to the Somer Valley where there has been historically poor delivery rates as reflected in the 2,200 outstanding commitments in the area. This total represents 25% of the district-wide housing target and if this level of housing is not provided then it will exacerbate the negative consequences for B&NES as a whole (referred to in Issue 1), preventing people having access to a home, making homes less affordable and in the long term, and damaging the local economy by reducing labour supply and mobility.
- 25) With specific regard to the housing commitments, it is highly uncertain given that many of the sites are Local Plan allocations that have failed to come forward over the lifetime of the plan – it is not clear why the Council is of the opinion that the commitments will be delivered over the lifetime of the Core Strategy. Accordingly RPS submits that there should be a requirement to review the delivery prospects of these sites on an ongoing basis and reassess the sites through the preparation of the Site Allocations DPD. In the meantime alternative development options need to be progressed.
- 26) In response to the Inspector's concerns relating to the 500 above existing commitments, RPS submits that many of these dwellings are likely to be delivered through the redevelopment of brownfield sites and there is no need to identify them as part of the 11,000 homes requirement; development control policies will no doubt support such development and the

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CS should take a more proactive approach to locating those 500 homes in other more sustainable and deliverable locations.

- 27) Those sites cannot be relied upon to deliver the overall strategic growth figure: paragraphs 1.29 and 4.15 and Policy SV1 of the Core Strategy confirm that further residential development will only be allowed where it brings employment or other community benefit. As per the Inspector's comments, RPS cannot see how any certainty can be applied to this element of the housing requirement.
- 28) The high level of uncertainty relating to the delivery of the allocated growth in the Somer Valley coupled with the disproportionate distribution of growth across the district undermines the soundness of the Core Strategy.