

**BATH AND NORTH EAST SOMERSET  
CORE STRATEGY  
EXAMINATION  
DAYS 1 & 2**

**and**

**Issues 1 & 2  
Housing Provision**

**Representations of behalf of  
Barratt Homes Bristol**

D2 Planning Limited  
Suites 3 & 4  
Westbury Court  
Westbury on Trym  
Bristol BS9 3EF

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Appearance  
DATE 17<sup>th</sup> & 18<sup>th</sup> January 2012

- 1) It is apparent from Topic Paper 9 that the Core Strategy makes insufficient provision for housing in the plan period. That Topic Paper concludes that for housing supply to absorb demographic change and support economic and employment growth potential the housing provision needs to rise to 12,100 dwellings (605 per annum) based on 8,700 jobs or 15,568 dwellings based on 11,700 net additional jobs. It is recognised that the Core Strategy make no provision for:
  - i) The shortfall against the Local Plan delivery which is circa 1000 dwellings.
  - ii) Assumptions that all sites will not be delivered. The Council recognise that its track record on delivery of housing has been poor. There is no indication that this will change in the Core Strategy.
  - iii) The excessively high levels of affordable housing provision that is required in the District.
  - iv) In addition, it should also be recognised that the Council cannot demonstrate a 5 year supply of deliverable houses.
- 2) Between 2006 and 2011, 1,967 dwellings were completed against a requirement of 2,750. Accordingly there is a considerable shortfall in housing which must be carried forward. It is noted that the Council wish to ignore the shortfall. They however have produced no evidence to justify this approach. Their suggestion that these households will have found housing elsewhere or within the sub region or beyond is simply to ignore their duty to meet the need for both open market and affordable housing within the District.
- 3) With regards the 5 year housing land we set out the current calculation as follows:-

Requirement 2006 – 2026	11,000 (550 dpa)
Requirement 2006 – 2011	2,750
Completions 2006 – 2011	1967
Shortfall 2006 – 2011	783
- 4) The Council calculates their 5 year requirement (2011-2016) as 3,011 or 602 dwellings per annum (dpa). In order to calculate their figure the Council have taken into account dwelling completions between 2006 and 2011 and then spread the resulting shortfall over the remaining Core Strategy period.

- 5) This is not the correct approach. The core strategy shortfall should be rolled forward and included within the housing requirement for the first 5 years as opposed to the remainder of the plan period as it was designed to meet a previous need which still exists.
- 6) The District's 5 year housing requirement is therefore 3,533 or 707 dpa. Based on the correct requirement calculation, and the Council's supply figure (i.e. 3,346) set out in the SHLAA (May 2011), The Council can only demonstrate a 4.7 year supply of deliverable housing land i.e. an undersupply of 187 dwellings. Assuming all these sites do come forward they will still be 187 dwellings short of their requirement. However, the Council's supply figures are not accepted.
- 7) An assessment of the sites which makes up the Council's supply indicates that several sites would not be delivered at the expected rate within the 5 year period. It is considered that the supply is more realistically in the region of 2,888 dwellings or 4.1 years. The objectors are willing to discuss and agree this assessment with the Local Planning Authority.
- 8) Therefore, using either the Council's own supply figures or those derived from an assessment of the sites, the Council does not have a 5 year supply of housing land.
- 9) In view of the above, the Council will not meet its 5 year housing land supply target let alone the requirements of the subsequent 5 year periods as required by PPS3. This also pays no regard to the draft NPPF which requires a further 20% of housing to be provided in addition to the 5 year housing supply. As such there is a need for more deliverable sites to be identified and to come forward. The Core Strategy is unsound in that it provides insufficient housing to meet future housing needs and identifies insufficient land. Accordingly the Inspector should recommend that the Council reassesses its housing provision and that it be substantially increased.
- 10) Following on from the above, objections continue to be lodged to the spatial distribution of new residential developments to the Rural Areas of 800 dwellings.
- 11) Given the factors identified above i.e. shortfall in housing provision in the adopted local plan, high levels of affordable housing supply within the Rural Areas this level of new development is totally inappropriate and will not help meet future housing needs or sustain existing facilities in the Rural Areas. Accordingly once the overall housing provision has been increased the level of housing for the Rural Area also needs to be increased.

12) It is therefore recommended that the housing provision for the Rural Areas be found unsound and needs to be reassessed.