

**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?**

**Wednesday 18 January 2012**

**The SHLAA**

*3.2 The SHLAA (CD4/H13, Table 2.1) identifies specific sites for 11,205 dwellings. The Council contend (SHLAA 2.532.54) that to this figure can be added at least 400 units and, potentially, 560 units from small sites windfalls in the last 4 years of the plan:*

- *Is it reasonable to include at least 400 units as part of the overall supply?*
1. Whilst we do not object to the inclusion of windfall sites after the first ten years, this needs to be properly justified and considered within the context of Core Strategy policy. The Council's policy of not releasing any greenfield land will have a detrimental impact on the delivery of windfall sites. Failure to release greenfield land set against a housing target well below the projected demand will increase the pressure to develop sites within the settlement boundary on previously developed land. This is particularly likely to be the case in and around Bath where sales values are highest and likely to rise further given the proposed undersupply of housing.
  2. We are disappointed that the Council has not properly assessed the urban extensions as part of the SHLAA assessment. We consider that these should have been assessed as part of the SHLAA assessment and not ruled out on policy grounds. This is contrary to the provision of PPS3, which requires Councils to only rule out sites within the SHLAA assessment there are obvious constraints that could not be overcome, and not because they are contrary to emerging policy. With regards to the Inspectors question, we consider that the SHLAA should more adequately assess the likely impact on windfall brownfield sites if no Greenfield sites are allocated over the plan period.

*3.3 Five year housing supply:*

- *What is the current 5 year supply position?*
- *Will the Core Strategy facilitate the provision of a 5 year supply over the plan period?*

- *If the requirement of the draft NPPF in relation to housing supply of 5 years plus 20% (paragraph 109) were to become national policy before the close of the Examination, would the Core Strategy facilitate such provision?*

3. We look forward to examining the Council's updated position on the five-year-housing supply which should be produced as a result of this question. Our point relates more to difficulties that the Council face with ensuring a five-year-land-supply with an inflexible supply of land over the plan period. The lack of greenfield sites within this supply and reliance on previously developed sites to come forward is fraught with difficulty. This can be demonstrated by the Council's failure to meet its more modest Local Plan target relying on mostly brownfield land. Our client has been directly involved in bringing forward brownfield sites within Bath. Their experience of the Riverside site in Bath, is that it has required significant levels of public subsidy to bring forward, which may not be available for other sites in the future. The Council is also reliant on MoD sites which are notoriously difficult to bring forward within a set timeframe.

*3.4 Assuming adoption in 2012, there would be only 14 years to the end of the plan period in 2026.*

- *Should the Core Strategy demonstrate how housing supply will be maintained over at least 15 years from adoption to comply with PPS3 53?*
- *If so, where would continued housing development take place?*

4. Both PPS3 and the draft NPPF requires local authorities to plan for at least 15 years of housing land supply. We do not understand why the Council continues to plan for only 14 years in the Core Strategy, particularly when other local authorities in the South West have changed their plan period to reflect this. Cornwall Council are now planning up to 2030 in their most recent consultation draft and the soon-to-be-adopted Sedgemoor Core Strategy plans up to 2027, rather than the RSS period of 2006 to 2026.

5. Planning for 15 years will mean finding additional housing for at least one year, Somerset does not have any strong preference over the location of new housing, except that it should be in the areas of highest need and demand in the district.