

Bath and North East Somerset Council Core Strategy Examination

Issue 4 – Is adequate provision made for specific housing needs?

Wednesday 25 January 2012

Affordable Housing

1. We have made strong representations in respect of Issue 1. Meeting affordable housing needs is a fundamental component in delivering “sustainable development”. In the case of Bath and North East Somerset, and Bath City in particular, the demonstrable affordable housing needs have not been sufficiently weighed in the formulation of the overall housing provision. Please see the evidence contained in the report appended to our original representations.
2. It is internally inconsistent for the Council, on the one hand, to give affordable housing needs apparently very limited weight in formulating the overall housing provision and in balancing against Green Belt considerations and, on the other, to seek to impose very challenging affordable housing percentage targets on landowners and developers for the insufficient sites which are being allowed to come forward.
3. We object to both the target figure contained in Policy CP9 and the Council’s approach to its formulation.
4. In view of the severity of the affordable housing needs we cannot conceive how the Council can justify reducing the affordable housing target from 3,400 to 3,000. Paragraph 6.8 of Topic Paper 9 makes it plain that there are other options open to the Council to ensure that a higher target might be achievable. The Council has not fully justified why these other options have not been pursued.
5. In our opinion the numerical target should not be merely residual as the Council apparently sees it. In this regard the following points are relevant:
 - The Core Strategy has a long term horizon; which is well beyond current housing market conditions and public spending programmes of Government. The Core Strategy must pro-actively set parameters as well as respond to practical constraints.
 - The Core Strategy should reflect the ambition of the national Housing Strategy (CD number still awaited) and the Council’s Sustainable Community Strategy (CD 4/04).
 - The local authority has an important housing enabling role; and will have the discretion and opportunity to ensure that schemes are delivered; and that affordable housing provision is prioritised over other matters.
6. We acknowledge that the level of any target is ultimately a matter of judgement in the light of all the available evidence. Such an approach is exemplified by the formulation of the 10,000 per annum regional minimum target, which the Secretary of State deemed appropriate. In the context of this and the overall level of housing

demand and the relative severity of affordable housing needs in Bath and North East Somerset (and as we have explained in respect of Issue 1) we cannot conceive the target being reasonably fixed at any less than 5,000. Any target below this in our opinion must symptomise the Core Strategy as unsound.

7. As per the Court of Appeal case **Barratt Development plc v Wakefield MDC and Secretary of State for Communities and Local Government (2010)** we consider that the evidence supports a percentage target of up to 35% on all sites of 10 dwellings or more, subject to economic viability on a site by site basis.
8. The current Local Plan includes a policy similarly seeking 35% affordable housing provision. The Council's delivery performance has been consistently below 35% over recent years (CD 5/10 pp 23-30), including periods in which the market has been relatively benevolent and the availability of public funding to deliver affordable housing relatively plentiful. Only twice (2006/07 and 2009/10) has output exceeded 100 dwellings per annum. Clearly there is a strong interrelationship with the sufficiency of overall housing provision.

Housing for Older People

9. Policy CP10 makes passing reference to housing developments **also** contributing dwellings which are suitable for the needs of older people.
10. Such a passing policy reference is inadequate and fails to reflect the strengthened emphasis of both the national Housing Strategy (CD number to be confirmed) and the draft National Planning Policy Framework.
11. Furthermore this deficiency is identified in the Sustainability Appraisal (CD4/A10). On page 44 it is concluded that Policy CP10 insufficiently identifies how housing that meets the needs of older people will be delivered.
12. The 2008 DCLG household projections show that between 2008 and 2033 over 50% of household growth across the District will come from the over 65 age group. Of the 20,000 additional households expected by 2033, approximately 5,000 households will be aged 85 and over. This age group is likely to have care needs as well as housing needs; which may not be capable of being met in their existing accommodation. Given the scale of need for specialist older person accommodation this demographic change is likely to create, it is extremely important that the Council encourages and provides for the delivery of the full range of accommodation and care options for these age groups. Such developments can create a wide range of community benefits, including the potential release of under-occupied family homes. The site requirements for these types of developments (which straddle the C2 and C3 Use Class classifications) are quite specific and the SHLAA fails to identify particular sites which would lend themselves to these types of developments. A separate policy with a stronger emphasis is required.
13. We recommend a new policy along the following lines:

“The Council will encourage the delivery of the full range of care and accommodation needs of older persons and people with a disability. This will include providing a range of developments for these groups, including, inter alia: extra care housing, residential care homes, sheltered housing and

continuing care retirement communities, in suitable locations across the District’.

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