BATH AND NORTH EAST SOMERSET CORE STRATEGY EXAMINATION

RESPONSE TO BNES/26 - HOUSING TECHNICAL REQUIREMENT

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Comments of BNES 26

1.1 BNES 26 merely reiterates arguments rehearsed in previous Hearing Statements produced by the Council. The paper does not provide any further clarification or explanation of the Council's strategy. We have not produced a detailed response to BNES 26 and rely on the Hearing Statements and their Appendices which have already been submitted. We are concerned that the Council have taken the opportunity to add to statements after the Hearing Session which do not provide any further clarification.

1.2 Pegasus Planning Group has objected to the Core Strategy and these issues are addressed in Hearing Statement to Issue 1. Pegasus Planning Group does not accept the Council's claim that their strategy is robust and their assessment of the housing technical need.

1.3 It is clear that the housing targets of the Submitted Core Strategy have been based on proposing no change to the Green Belt. The Council's approach is that the Core Strategy's policies will result in a scale of housing provision that is well below reasonable assessments of future housing requirements, which Pegasus Planning Group have addressed in Hearing Statements in response to Issue 1 and its appendices.

1.4 If student housing is now to be counted towards the housing requirements for the District then the Council will need to assess what the student housing need is over the plan period. Neither the SHMA (CD4/H11) nor the Stage 2 Report (CD4/H1) address the need for student housing.

1.5 It is not clear how the Council can state that they have assessed the harm from the urban extension sites as not all the urban extensions have been assessed in the Sustainability Assessment, furthermore a comprehensive review of the Green Belt has not been undertaken as part of the preparation of the Core Strategy.

1.6 Pegasus Planning Group for reasons outlined in Hearing Statements 1, 2 and 3 does not consider that the Council have "properly grappled with the planning balance." The Council acknowledge that the housing land supply is tight, even against their own housing requirement, which is considerably lower that the latest ONS Projections for BANES, without taking into account the wider cross boundary issues

in the West of England that both RPG10 and the RSS sought to address (reference is made to Hearing Statement 1 and its appendices.) The Council's strategy does not provide for any flexibility should the brownfield sites not deliver as anticipated. Inadequate housing provision was made during the Local Plan period 1996 – 2011 only on four occasions did the actual completions exceed the local Plan target of 457 dwellings per annum. The Council's approach will exacerbate the shortfall in housing land supply and increase the need for affordable housing.

1.7 Pegasus Planning Group considers that the backlog of housing should be taken into account; the issue should be how this backlog is taken into account not whether it is taken account. The backlog should be addressed in terms of housing land supply, in the first five years as the need remains.

1.8 Annex A to BNES26 sets out the Council's opening comments at the hearings on Issue 1. Pegasus Planning Group makes the following points to clarify the comments about the ONS Projections in paragraph 3 c.

- in order to identify projected growth in labour force, the Chelmer Housing and Population Model applies age and gender specific participation rates to the estimates of total population;
- the specific data source for the gender specific participation rates is Cambridge Econometrics Multisectoral Dynamic Model that includes forecasts of employment down to LAD level. This source is updated every six months in order to replicate recent trends;
- this scenario, therefore, entirely reflects a 'real world' scenario based on projecting past trends forward;
- past trends as identified by Pegasus Planning Group in earlier representations represent low levels of housing completions (which have arisen from the Local Plan provision), which has distorted patterns of migration as a result of restricted growth;
- Furthermore, it is unclear what the WE LEP 95,000 job target (to 2030 and 72,000 to 2026) is based on. Is it past trends? It is possible that based on the level of dwelling provision to meet the needs arising from the 2008 Based Household Projections additional job growth (above the LEP target) may arise as a consequence of meeting needs and demands for housing.

1.9 Although BNES 24 states that the Council is committed to undertaking a timely review of the Core Strategy in conjunction with other West of England Authorities we are not aware of the timescale or the mechanism that will ensure when this review will take place. Furthermore the fact that a review will need to be undertaken in the

context of the "Duty to Co-operate" will inevitably result in a more time consuming process rather than a quick review of the Core Strategy.

1.10 Pegasus Planning Group have objected to the Core Strategy, the shortage of housing provision in the Core Strategy means that the strategy is fundamentally unsound without a proper review of the Green Belt to investigate opportunities to meet strategic and local housing needs. Postponing addressing the issues to an early review will not address the unsoundness of the Core Strategy.