



Programme Officer
Bath & North East Somerset Core Strategy
c/o Banks Solutions
21 Glendale Close
Horsham
West Sussex
RH12 4GR

Nicholas Matthews MTCP MRTPI
E: nmatthews@savills.com
DL: +44 (0) 117 910 0370
F: +44 (0) 117 910 0399

Embassy House
Queens Avenue
Bristol BS8 1SB
T: +44 (0) 1179 100 300
savills.com

Dear Mr Banks,

**Bath and North East Somerset Core Strategy Examination
Response by Savills to BANES 26: Housing Technical Requirement, Planned Provision and Flexibility**

We have reviewed the document published by Bath and North East Somerset Council (the Council) and wish to make the following comments.

i. Technical Requirement versus Planned Provision

It is simply unacceptable in our view for the Core Strategy not to plan for the delivery of sufficient housing required to meet the identified needs. Notwithstanding the significant issues raised at the examination in relation to the methodology used to calculate the strategic housing requirement and various further short comings in the Council's evidence base, the Council still only propose to deliver 11,500 dwellings as opposed to 12,100, which its own evidence indicates to be the level of need.

Not only has the Council failed to accept the necessary increase in the strategic housing requirement, but in increasing the housing requirement to 11,500 dwellings, it has chosen not to make any further allocations. The change from 11,000 to 11,500 dwellings will have no material impact upon housing delivery other than a marginal increase in the calculation of the 5 year housing land supply targets.

ii. Backlog and Flexibility

For the reasons discussed at the examination session, we strongly contend that the Council must take into account the backlog in housing delivery in the strategic housing requirement. To do so is common practice and a principle accepted by local authorities and appeal inspectors on many occasions.

The Council nevertheless contend that there are a number of contingent sources of supply which together will provide an increase in the housing requirement. Consistent with the discussion at the examination, we do not consider that it is appropriate to adopt a significantly more conservative stance on economic growth than the LEP, of which the Council is a key constituent member. The 1.9% per annum economic growth assumption is, we believe, conservative when taken across the Core Strategy time period and significantly below the levels proposed by the LEP.

Notwithstanding, one of our principal concerns with the Core Strategy is its failure to recognise its strategic context and the location of Bristol and its failure to plan to meet the development needs of the City. The fact that Bristol City Council has not objected to the housing requirement in the Core Strategy does not mean that the proposed figure is correct but in our view represents a deeper failing to properly coordinate the growth of the City region between the constituent Authorities. The need for additional housing beyond the Bristol City Council administrative boundary was recognised in the Inspector's Report on the Bristol Core Strategy; the fact that Bath and North East Somerset Council



and Bristol City Council have chosen to ignore this in the preparation of the Core Strategy does not mean that the plan is sound.

iii. **Head room and particular sites**

The Council appear to be implying that there is greater capacity on those sites studied within the City Centre and Bath Western Riverside East area to increase the scale of housing delivery. Various figures are derived from the two capacity studies contained within the evidence base (CD4/UDL15 and CD4/UDL16). The figures quoted in relation to both areas assume that all of the floor area will be developed for residential and no other uses. This is highly unlikely particularly where there is demand for active ground floor frontages. Also, the 211,670sqm figures for the city centre and those figures provided for the scenarios within the Bath West and Riverside East area are the gross, as opposed to net floor areas. This fact alone instantly removes 20% of the developable floor area for residential buildings and will thus reduce the potential number of units.

Notwithstanding, these technical issues regarding the floor space figures, it would be highly inappropriate to remove the sensitivity factor of 20% and, indeed, we believe this figure is very conservative given the sensitivity of many of the sites. If anything, a greater contingency factor should be incorporated to ensure that the scale of housing assumed to be deliverable from these key sites can be achieved.

iv. **Windfalls**

The guidance on use of windfalls within the plan period is very clear. Unlike other very constrained Authority areas we believe there are no grounds for reliance upon windfalls within this Core Strategy.

v. **Conclusion**

For the reasons provided in our evidence to the Core Strategy, we firmly believe there should be an increase in the strategic housing requirement which, as a very minimum, addresses the identified housing needs of 12,100 dwellings and meets the backlog from the previous plan period of 850 dwellings. Whilst this figure would still in our view be substantially lower than the actual housing need and would not assist in addressing the shortfall from the Bristol Core Strategy, it would nevertheless make an improved contribution of housing supply. In addressing the shortfall of 1,950 dwellings, the Council must properly review all strategic options and identify appropriate land to meet this need. It is not sufficient simply to state that some or all of this housing will come from existing identified sources of supply which are themselves uncertain.

Yours sincerely



Nick Matthews MA MTCP MRTPI
Associate Director