



Unit 2 Eclipse Office Park Staple Hill Bristol BS16 5EL

T: 0117 956 1916
F: 0117 970 1293

E: all@tetlow-king.co.uk
W: www.tetlow-king.co.uk

Mr Chris Banks
Programme Officer
c/o Banks Solutions
21 Glendale Close
Horsham
West Sussex
RH12 4GR

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EB/RT M6/0518-07

By Post and Email: chris.banks@zen.co.uk

Dear Mr Banks

RE: BATH AND NORTH EAST SOMERSET LOCAL DEVELOPMENT FRAMEWORK – CORE STRATEGY – COMMENT ON THE IMPLICATIONS OF THE NPPF

I wish to withdraw my representation submitted on behalf of the **South West HARP Planning Consortium** on 18 April 2012 (ref: M6/0518-06) and have it replaced with this letter.

On behalf of the Consortium, we welcome the opportunity to comment on the implications of the new National Planning Policy Framework (NPPF) for the Council's Core Strategy. We consider that it serves to reiterate those points made in our representations on the publication plan and proposed changes in February and October 2011 respectively (as per letter refs: M6/0518-04 and M6/0518-05), and which had a particular focus on housing policies.

Our specific comments on nos. 1 to 3 of the Inspector's questions are provided below.

1. Approach to assessing the housing requirement

The SHMA remains of paramount importance. However, the NPPF directs that the evidence base should ensure that the plan *'meets the full, objectively assessed needs for market and affordable housing in the housing market area ...'* (paragraph 47). The Council is only proposing to make provision for needs to be *partially* met.

Paragraph 50 further adds that *'current and future demographic trends'* should be applied. This demands usage of the most current household projections; these being the CLG projections (2008-base) which show an increase of 14,000 new households between 2006 and 2026, as opposed to the 11,000 which BANES is currently seeking to plan for.

Furthermore, the NPPF now invests in councils a requirement to ensure that all housing needs are met via monitoring of housing trajectories and creation of implementation strategies (paragraph 47). As such, the onus is now more than ever on councils to objectively assess, plan for and monitor market *and* affordable housing in a fully integrated fashion. Within this, sufficient specialised accommodation for the older population should be planned for.

2. Whether a 20% buffer should be applied to the five year housing land supply

This should apply. Despite the acknowledged effort that has been made in recent years to increase the supply of housing, the evidence base demonstrates the need for this greater buffer, as opposed to the alternative 5%.

According to the most recent AMR available (covering the period 2009/10) Local Plan targets have not been met leading to an accrued shortfall of approximately 1000 dwellings by 31 March 2010. We expect a similar shortfall to be highlighted in the 2010/11 AMR which is under preparation.

3. Whether an allowance can and should be made for windfalls in the five year housing land supply and thereafter in the 6-15 years bracket

As a starting point, it is now clear that a 15 year time horizon should be applied, as opposed to the 14 years intended by the Council, and we hope that this will be changed.

Whilst inclusion of windfall sites is now discretionary, it is necessary for councils to provide firm evidence that they have provided, and will continue to provide, a *'reliable'* source of supply (paragraph 47). On the basis of previous underachievement of annual housing requirements, as noted above, and of which windfall sites were a significant element, we argue that they are not a reliable source and an allowance should not be made in respect of five year (+20%) supply.

Windfall sites are also typically brownfield sites which are inherently more difficult to deliver and are potentially reliant on public subsidy for viability. This would further suggest that an allowance for windfall sites should not be made in respect of the five year supply.

Instead, we maintain that sufficient greenfield sites (inclusive of urban extension sites) should be identified through the Council's SHLAA to maintain a consistent and adequate delivery rate in the longer term. This is further supported by paragraph 52 of the NPPF which encourages provision of a portfolio of sites inclusive of urban extensions; a brownfield first policy no longer needing to be slavishly applied.

We trust that our comments will help refine the Core Strategy and bring it into accordance with the NPPF.

Yours sincerely



ELIZABETH BOYD
ASSOCIATE DIRECTOR
For and On Behalf Of
TETLOW KING PLANNING

elizabeth.boyd@tetlow-king.co.uk

cc: Guinness Hermitage Trust
Green Square Group
Raglan Housing Association
Knightstone Housing Association
Aster Group
Spectrum Housing Association
Somerset Housing Association
Sovereign Housing Association

Housing Enabling Officer: - Adrian Holloway