

B&NES Core Strategy Examination Hearing: 10/11th December 2013

The housing requirement and all matters relating to the SHMA

'Calculating the overall housing requirement'- Question 3.33

I am deeply concerned that B&NES proposals to build 1,100 houses in Green Belt, Bath's WHS landscape setting and the Cotswolds AONB result in 4,209 more market houses than their own needs analysis indicates.

The November 2013 'Schedule of Core Strategy Amendments' indicates that B&NES' housing needs 'objectively assessed' are 8,727, of which 5,437 are market and 3,290 are affordable houses. However, B&NES considers that developers will not be able to 'deliver' the required 3,290 affordable houses with 5,437 market houses and therefore plans to boost the number of market houses by 4,209 or 77%, in order to achieve the affordable houses target.

This is an extremely alarming increase, not least because B&NES indicate that 2,935 affordable houses can be accommodated on non Green Belt land. This figure is 24.75% of the total number of houses (market + affordable) planned on non Green Belt land and only 355 short of the affordable houses target (3,290).

Increase this percentage by just 3% to 27.75% and the affordable housing target would be achieved; critically, there would be no need to build houses (market or affordable) in the Green Belt.

Contrast this with the B&NES proposals which would result in the Green Belt being built on to accommodate market houses which are surplus to needs.

NPPF paragraph 47 states - 'To boost significantly the supply of housing, local planning authorities should: use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period'.

B&NES may argue that it is doing what is required by the NPPF, but is the NPPF really suggesting that it is acceptable to build in the Green Belt, WHS landscape setting and Cotswolds AONB to accommodate market houses which are surplus to requirements?

The answer must be an emphatic no, given the NPPF requirement that plans should be 'consistent with the policies set out in this Framework' and the great importance which it attaches to Green Belt and conservation and enhancement of both natural and historic environments.

B&NES' obligations are clear - housing needs (market and affordable) must be met but the Green Belt and Bath's landscape setting must also be protected, conserved and enhanced.

There is, therefore, every reason to challenge developer affordable-to-market housing ratios and devise innovative schemes which focus on delivering attractive affordable houses while generating acceptable returns for the developers. B&NES must meet this challenge.

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