

Bath and North East Somerset Local Plan

Strategic Housing Land Availability  
Assessment

Findings Report  
(March 2013)



# Strategic Housing Land Availability Assessment

## 2013 - Findings Report

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### Appendices

This report summarises the site assessments that have been undertaken. It should be read alongside:

Appendix 1a: Site assessments and plans for land within Bath

Appendix 1b: Site assessments and plans for land in the Green Belt adjoining Bath

Appendix 1c: (i) Site assessments and plans for land within Keynsham  
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Appendix 1f: Site assessments and plans for rural villages.

Appendix 2: A housing trajectory for each main settlement /area and for the district as a whole, showing past performance, estimating yearly delivery for individual sites and the cumulative effect of this on overall anticipated delivery rates. I effect this show how the housing delivery strategy will be

## Introduction

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) is part of the evidence base for the Local Plan. The assessment is required by the NPPF: 159. The SHLAA supports the preparation and review of the Local Plan. It attempts to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The objectively assessed need for housing is set out in the Strategic Housing Market Assessment.
- 1.2 The SHLAA also plays an important role in the monitoring process, providing evidence of the level and distribution of housing completions and on the sites that can contribute to the district's rolling five year housing requirement.
- 1.3 This version of the SHLAA accompanies the Proposed Changes to the Submission Core Strategy (March 2013). Updates and/or amendments to the SHLAA have been made based on new information about existing sites, the emergence of new sites and delivery monitoring for the 2012/13 reporting year (on-going). To aid the update the Council held a 'call for sites' update in October 2012.

## National Planning Policy Context

- 1.4 NPPF:47 requires that that the LPA
  - Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and completion in the market for land where there has been a record of persistent under delivery of housing, LPAs should increase the buffer to 20%<sup>1</sup> (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and completion in the market for land
  - Identify a supply of specific deliverable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

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<sup>1</sup> The Council accepts that its housing supply plans require a 20% buffer on account of the shortfall in housing delivery experienced during the Local Plan Period 1996-2011 of 1,167. This represented a 17% shortfall in delivery against the target of 6,855.

- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period<sup>2</sup> and set out a housing implementation strategy (in preparation) for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.
- 1.5 NPPF 48: advises that LPAs may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens and will continue to provide a reliable source of supply.<sup>3</sup>
- 1.6 The Assessment is an important evidence source to inform plan-making, but does not in itself determine whether a site should be allocated for housing development or planning permission granted. The allocation of a site for development can only be undertaken in a Development Plan Document. The Core Strategy Plan-making process will determine which suitable sites should come forward for development and for what level of redevelopment. It is likely that the SHLAA will identify more suitable, available and achievable land than is needed to meet the objectively assessed need for housing. Only the most suitable, sustainable and deliverable sites need be selected for development.

## Methodology

- 1.7 The geographic scope of the SHLAA covers:
- Land within Bath
  - Land in the Green Belt adjoining Bath
  - Land within Keynsham
  - Land within the Green Belt adjoining Keynsham
  - Land in the Green Belt to the South East of Bristol
  - Land within and adjoining Midsomer Norton and Radstock
  - Land within and adjoining Paulton and Peasedown St John
  - Land within and adjoining Batheaston, Bathhampton, Bathford, Bishop Sutton, Chew Magna, Corston, Clutton, East Harptree, Farmborough, High Littleton, Temple Cloud, Timsbury, Saltford and Whitchurch
- 1.6 The SHLAA comprises assessments of submissions from developers and landowners to identify developable land with and beyond housing development boundaries. The Council has also

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<sup>2</sup> See appendix 2

<sup>3</sup> The Council seeks to include such an allowance and this is evidence in Section # of this report.

assessed land adjoining housing development boundaries where there are no developer/landowner submissions. This is because it is not always the currently available sites that are the most suitable sites for development and it is part of the Council enabling role to pursue the most sustainable opportunities (so long as they are deliverable). Therefore, the SHLAA attempts to provide a comprehensive 360 degree assessment of all the land adjoining a settlement where resources permit. Additional suitable sites may yet come forward as part of the on-going updating process and as landowners learn of an engage with the plan-making process.

1.7 Beyond the settlements listed in 1.7, the Council has not actively sought to identify sites for housing as the level of potential will be less strategic in nature (even cumulatively). However, completed developments and existing planning permissions in smallest rural settlements do still contribute to identifiable supply for the Core Strategy period and to 5-year land supply.

1.8 A number of other studies have been prepared that have relevance to the SHLAA. Where these studies are relevant they are indicated on the site assessment forms (appendix 1)

- Urban Design Review of Bath City Centre Sites (May, 2009).
- Urban Design Review of BWR East / Green Park Station (April, 2009).
- Bath Building Heights Study.
- Economic Regeneration Delivery Plan for Bath (March, 2011).
- Economic Regeneration Delivery Plan for Keynsham (March, 2011).
- Economic Regeneration Delivery Plan for Midsomer Norton (March, 2011).
- Economic Development Floorspace requirements (March 2013).
- Development Concept Options Reports for Green Belt Sites at West of Twerton, Odd Down, Weston, East Keynsham, South Keynsham, West Keynsham, Whitchurch and Hick Gate (Arup, March 2013).
- Green Belt Review (Arup, March 2013).
- Transport Assessment of Green Belt Sites (Arup, 2013)

1.9 Whilst no stakeholder involvement or panel has been convened during the preparation of the SHLAA, the findings are open and transparent and enable interested parties to critically review the outputs and relay any observation to the Council for consideration

1.10 The SHLAA has its own particular lexicon i.e. suitability, availability, achievability. These terms are defined in the [SHLAA Practice Guidance \(CLG, 2007\)](#)

## Key Findings of the Assessment

- 2.1 The site assessments (appendix 1) set out the Councils view on the housing potential (capacity), suitability, availability and achievability of land. Sites forming part of the identified supply for the plan period are presented in the housing trajectory (appendix 2). Appendix 2 is the best place to understand the Councils 5 year land supply position in respect of the Proposed Changes to the Submitted Core Strategy. It presents capacity and delivery assumptions on all sites that can be reasonably expected to yield housing in the next 5 years (and beyond).
- 2.2 The following section is less a summary of the 5 year supply position (which is set out in summary and in detail in appendix 2) and more an introductory overview of the land supply position the district for the whole plan period. The focus is on the more strategic developments sites in the District. A number of the observations made are of course directly relevant to 5 year land supply matters.

### Land within Bath

- 2.3 The SHLAA concludes the city of Bath, can within, its existing limits deliver about 6,280 houses on suitable and available (or reasonably likely to become available) sites between 2011/12 and 2028/29.

#### Western Riverside

- 2.4 Western Riverside is a large allocation of the extant BANES Local Plan. It comprises a number of areas.
- 2.5 The biggest single site within Bath is Western Riverside is being developed by Crest and this area has planning permission for 2,281 units (06/01733/EOUT). Reserved matters have been permitted for the first phase of 299 homes and construction and about half of these have been completed and the remainder are under construction.
- 2.6 A planning application was submitted for a second phase of 26 houses and apartments in December 2012 (12/05590/RES). A further 150 units can be occupied before a major barrier to delivery is reached. This relates to the cost and time of decommissioning and removing the Windsor Bridge gas holders. A second barrier is reached at 650 homes in respect of the need to provide a new bridge for traffic and pedestrians. West of England Revolving Infrastructure Fund (RIF) will be utilised to address these matters. The latest position in respect of the RIF was presented to [Cabinet on April 10<sup>th</sup> 2010 \(item 188\)](#). The report to Cabinet demonstrates that a timely resolution can be achieved. The housing delivery trajectory reflects the anticipated

programme of works and also assumes that BWR can deliver on average 150 units per annum from 2015/16.

- 2.7 The eastern part of Western Riverside is now subject to a planning application for a supermarket-led development led by Sainsbury's. The application proposes that the existing Sainsbury's store relocate to the current Homebase Site, for the existing Sainsbury's store to remain in A1 use and for 285 house and flats alongside office floorspace to come forward. Sainsbury's do not control all of this land. Homebase currently have a lease with British land to remain on their current site until 2020. This could delay the implementation of planning permission if it was granted.. The application area excludes the Help Hire gyratory and the employment units on James Street but these locations are also available for redevelopment.
- 2.8 The final component of Western riverside relates to that part of the site that lies between the Avon and Upper Bristol Road (excluding the existing Council waste depot, which falls within the area covered by (06/01733/EOUT)). To the west the vacant Windsor Bridge Road Site is in the control of Westmark and can be delivered once the gas holders are decommissioned. There are also some residential-led redevelopment opportunities to the east that are currently in light industrial and sui generis use. In total this strip could yield about 300 houses and apartments.

#### City Centre

- 2.9 The SHLAA assumes that Avon Street Coach and Car Park and Manvers Street Car Park/Police station/Post Office Depot will be redeveloped for a mix of uses and will contribute 250+ apartments as part of employment-led mixed use schemes. The precise mix of uses will be refined Placemaking Plan and via the determination of planning applications. The capacity of residential units on city centre sites has increased in relation to the previous SHLAA on account of the application of new employment densities research from the [Home and Communities Agency](#) which advises that companies utilise about 1/3 office less floorspace per worker than they did 10 years ago. This means that less land need to be allocated for office space and that more is available for residential or other uses.
- 2.10 Flood Risk is a key suitability and achievability issue here. The Council has presented an exceptions case in respect of the need to develop housing in such locations. Working with the Environment Agency, the Council has agreed a technical solution capable of delivery. This will utilise the RIF and is discussed in the detail in the [April 10th 2013 Report to Cabinet \(Item 188\)](#).

#### Former MoD sites at Ensleigh Foxhill and Warminster Road

- 2.11 Since the Core Strategy was submitted the MoD has disposed of these sites, which has increased the level of certainty in respect of delivery.



- 2.12 The capacity of Foxhill is about 700 and this site has been bought by Curo. The involvement of a Curo may mean that a greater proportion of affordable housing may come forward on this site than the policy requirement of 30%. Curo are expected to refined their intentions during 2013.
- 2.13 The capacity of Ensleigh is about 350 and the Council has identified that the capacity of the Royal High Playing Field immediately adjoin Ensleigh is available and would increase the capacity of the area by 120 to 470. The Proposed Changes to the Submitted Core Strategy allocate this site for development. About 1/3 of Ensleigh is subject to a leaseback clause until 2018. Part of the site (to the south of Granville Road) is already subject to a planning application for 40 houses and flats.
- 2.14 The capacity of Warminster road is about 120. Collectively the capacity of all three sites (including the extension to Ensleigh) is about 1,300.

#### Other Sites

- 2.15 The identification of 100 units on the Bath Press and 150 units at Twerton Park are two major additions to the SHLAA. The former reflects the refusal of a planning application for a large supermarket on this site, although an appeal is scheduled for July 2013. The identification of 100 units reflects the contribution that high density housing could make to a mixed use development of this 2.2 ha site. The addition of Twerton Park reflects the position of the Football Club that their continuing occupation of this facility is not economically sustainable.

### Land in the Green Belt adjoining Bath

- 2.16 Large areas of land availability in the Green Belt are limited to Sulis Manor/Odd Down (Hignett Family Trust), West of Twerton (Duchy of Cornwall) and land in the control of about half a dozen land owners on the lower southern facing slopes above Weston.
- 2.17 A Development Options Concept Report identifies that the capacity of [Odd Down/Sulis Manor](#) is 750. This report area excludes Sulis Manor itself (3.0ha) and a land immediately to the east of Combe Hay Lane (3.0ha) from consideration as suitable areas for development, The council considers that Sulis Manor is suitable or development although some of its mature vegetation may need to be retained. The land adjoining Combe Hay Lane forms part of an SSCI but appears have degraded recently. it is not likely to be suitable for housing development re undermining and land stability
- 2.18 A Development Options Concept Report in respect of the [Lower slopes at Weston](#) identifies that adjoining the current built up area there are four to five suitable areas that could be developed for housing and these areas could yield about 500 houses. The suitable areas exclude areas of

spring streams/drainage channels and an SNCI. Not all of the remaining suitable areas are available for development as indicated within the SHLAA site assessments. Where land is suitable and available, further assessment is needed in respect of the achievement of highways access and the impact of development on PROW. One field (to the rear of Purlewent Drive) is particularly well used by people living in the area for recreation and forms a link between Weston Park and Primrose Hill Community Woodland.

- 2.19 Whilst land at Sulis Manor/Odd Down and at Weston is suitable for housing, development would result in harm in respect of number of environmental considerations. However, the level of harm is not considered to be so great as to render the sites (or large areas within them) unsuitable and scope for mitigation is high.
- 2.20 The Development of 1500 homes promoted [West of Twerton](#) by the Duchy of Cornwall would cause substantial harm to the setting of the OUV of the World Heritage Site. Development here would also significantly harm the setting of the AONB, not least in views from Kelston Historic Park and Garden. The site is somewhat dissociated from the urban fringe and connectivity across the Newton Brook valley cannot be achieved. A lower level of development would reduce the environmental impact but not achieve critical mass in respect of providing local services and extending bus routes. The SHLAA concludes that this area is not suitable for development.
- 2.21 The SHLAA also assesses the credentials of other large potential development cells around Bath but finds no evidence of large scale availability or any large suitable land areas. The Council has not assessed the suitability credentials of National Trust Land at Claverton Down as it is not available. It has also not assessed the credentials of land south of Old Fosse Road on account of the steepness of the slopes and the presence of three ancient woodlands
- 2.22 Other small parcels of land have been promoted around Bath. Land behind Minster Way is regarded as being unsuitable in respect of WHS Setting impacts and 4-5 other parcels have yet to be fully assessed but would likely yield up to 20-30 houses each. Further small sites may come forward during the consultation process on the Proposed Changes to the Core Strategy.

## Land within Keynsham

- 2.23 The SHLAA concludes that Keynsham, can deliver about 1,640 houses on suitable and available (or reasonably likely to become available) sites (that are not within the Green Belt) between 2011/12 and 2028/29.

2.24 Somerdale (650 dwellings) and Land at South West Keynsham (530 dwellings with flexibility for 60 more<sup>4</sup>) account for the vast majority of supply. Half of SW Keynsham is under construction and the other half (Council owned) is in the process of being disposed of. The submission of a planning application re Somerdale is imminent. Limited potential has been identified for the intensification of suburban Keynsham, although there are some modest opportunities adjoining the High Street.

## Land in Green Belt adjoining Keynsham

2.25 Landowners and developers have promoted a significant amount of land in the Green Belt to the east, west and south of Keynsham. Much of the land in the area is suitable for development although there are some absolute constraints and some areas are relatively stronger in respect of their sustainability credentials than others.

2.26 Four Development Concept Options Reports explore the potential of the land around Keynsham. Broadly speaking it can be deduced that there at least 2,500 units worth of suitable supply and an upper limit of 3,500 units

2.27 To the [East of Keynsham](#), the Keynsham Salford gap is a large area suitable housing land. There are some constraints here such as the presence of a national high pressure gas main, community woodland, and the railway is a barrier to unlocking development to the north. Broadly speaking this area can be sub-divided into three cells and the Concept Options Report identifies that:

- Area (c) south of the A4 could yield 750-950 dwellings
- Area (b) between the A4 and the railway could yield up to 350 dwellings
- Area (a) north of the railway could 650-830 dwellings

2.28 Area (b) is also identified a possible location for expansion of the Ashmead Industrial Estate. The utilisation of this option would of course reduce the areas potential capacity for housing.

2.29 To the extreme south of the eastern finger of Keynsham at [Uplands](#) is also partly affected by the alignment of the gas main but the remainder of the area is suitable area could yield 400-500 dwellings.

2.30 To the extreme south of the western part of Keynsham (south of the existing Local Plan allocations) Bovis Homes have promoted the development of about 1,000 dwellings. The Concept Options Report for [South Keynsham](#) presents three options for the development of this area, at

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<sup>4</sup> This flexibility relate to 1.5ha of land allocated for employment uses in the Local Plan. Given the new proposal for employment land in the Green Belt East of Keynsham, in a location more suitable for such uses there may be justification for not pursuing employment related development on the existing Local Plan site.

770, 560 and 300 dwellings. Each greater level of development has progressively more impact re landscape sensitivity, visual aspects and highways impact.

- 2.31 To the [West of Keynsham](#) lies a potentially developable area sitting above Stockwood Vale. However, the developable area of the southern part of this plateau is affected by the alignment of a gas pipeline. This means that only 2ha can receive housing development and this constrains the potential to 75 dwellings. The middle/northern part of plateau cannot be accessed from the existing highways network without securing 3<sup>rd</sup> party properties on Lays Drive. It might be possible for third party land to be acquired but there is a clear achievability issue here and the impact on Lays Drive itself would need to be assessed. Gaining access to the extreme northern part of site seems impracticable given the presence of narrow cul-de-sacs off Lockingwell Road. Equally St Francis Road does not seem capable of being widened to achieve access.

### Land in the Green Belt to the South East of Bristol

- 2.32 A number land parcels have been promoted as being available for development. These are focused on Hicks Gate (RPS and Key Properties) and Whitchurch (Talyor Wimpey, Robert Hitchins and others).
- 2.33 A further large SHLAA submission relates to Stockwood Vale Golf Club. This is considered to be unsuitable for reasons relating to a lack of connectivity with the edge of Bristol, landscape impact, and Green Belt.
- 2.34 In its adopted Core Strategy Bristol City Council does not make immediate provision for an expansion of the city into the Green Belt in this area. However, Policy BCS5 of the Bristol Core Strategy does identify land in the Green Belt at Hicks Gate as a contingency area for development. The contingency will be considered if monitoring shows that planned provision for the city will not be delivered at the levels expected, or if land is required to accommodate higher levels of provision. Paragraph 4.5.22 of the Bristol Core Strategy states that the capacity of the contingency area at Hicks Gate is unlikely to exceed 800 homes if existing uses are retained.
- 2.35 A Development Concept Options Report for [Hicks Gate](#) (for land within BANES) confirms that this area is suitable for development. This would be subject to development taking place alongside or following the Bristol contingency area. There are some topographical, hydrological and utilities related constraints but these are not absolute and will inform master planning. The potential of the area (within BANES) is at least from 650 and rises to 1200 if a greater level of environmental impact and Green Belt intrusion is accepted.
- 2.36 A Development Concept Options Report for [Whitchurch](#) confirms that the area is suitable for development. The setting of Maes Knoll (SAM) presents an absolute constraint that limits the

southern extent of the area that is suitable for development. The availability or otherwise of HorseWorld is also a major influence on capacity. Green infrastructure and historic environmental assets (designated and undesignated) in respect of the immediate surroundings of Bristol and Whitchurch also present master planning constraints. The report concludes that if all the area is available for development then 3000 dwellings could be forthcoming. If HorseWorld is removed from the equation then the capacity of the area is unlikely to exceed 2,000. HorseWorld are currently pursuing enabling development of 100 units on part of their site which the Council understands would secure the future of the charity in this location. Should permission be granted the majority of the remainder of the HorseWorld Site may not be available for development.

## Somer Valley (Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John)

- 2.37 The SHLAA concludes that this area can deliver about 2,100 dwellings on suitable and available (or reasonably likely to become available) sites (within housing development boundaries or on sites with planning permission).
- 2.38 The supply is heavily influenced by the redevelopment of land in former industrial/ railway use e.g. Paulton Printing Factory (600), Alcan (170), Welton Bibby & Baron (150), St Peters factory (115) and Radstock Railway Land. These opportunities are supplemented by greenfield Local plan allocations e.g. Cautletts Clos, Midsomer Norton (95) and Wellow Lane, Peasedown (95).
- 2.39 Much agricultural land has been put forward for development around Midsomer Norton, Radstock and Westfield. For many sites, development would result in a moderate to high landscape, visual or highways impact(i.e. resulting in low to moderate suitability credentials) but this does not necessarily mean they are not suitable for development (wholly or in part) if suitable master planning, mitigation and highways improvements can be achieved. Appendices 1di-iii set out the suitability credentials of each area that has been considered.
- 2.40 There are areas where development would cause too much harm in relation to the character and setting of each town and the Conservation Areas for it to be deemed suitable. Where this is the case a 'nil' suitability rating is given.
- 2.41 There is little evidence of availability on the periphery of Paulton. The redevelopment of the former Polestar factory will continue about 10 more years (based on the current rate of implementation) and so there is little justification for a further expansion of the village during this time. Peasedown has grown significantly as a commuter village to Bath There remains a limited amount of available and suitable land between the Bath Road and Lower Peasedown. Elsewhere land is available to the south of the bypass. This is physically capable of

accommodating development but the impact would be high and represent a breach of the contained nature of the village.

- 2.42 In short there is sufficient suitable land in the Somer Valley area that could be developed to supplement existing supply if needed. There is likely more suitable land than should be developed given the sustainability credentials of the Somer valley as a whole and the other options for development in the District.

## Rural Areas

- 2.43 Much of Bath and North East Somerset is rural and comprises small to medium sized villages. During the previous BANES Local Plan period these villages made a significant contribution to housing land supply, particularly in respect of small windfall sites. These villages have also grown fairly recently as a result of planned growth and the allocation of land for development. There is a mixed picture of land availability and suitability across the rural villages is easy to summarise. In short sufficient the Assessment reveals that there are certainly options available to address NPPF: 54 and the requirement for LPAs to plan housing development to reflect local needs particularly for affordable housing.

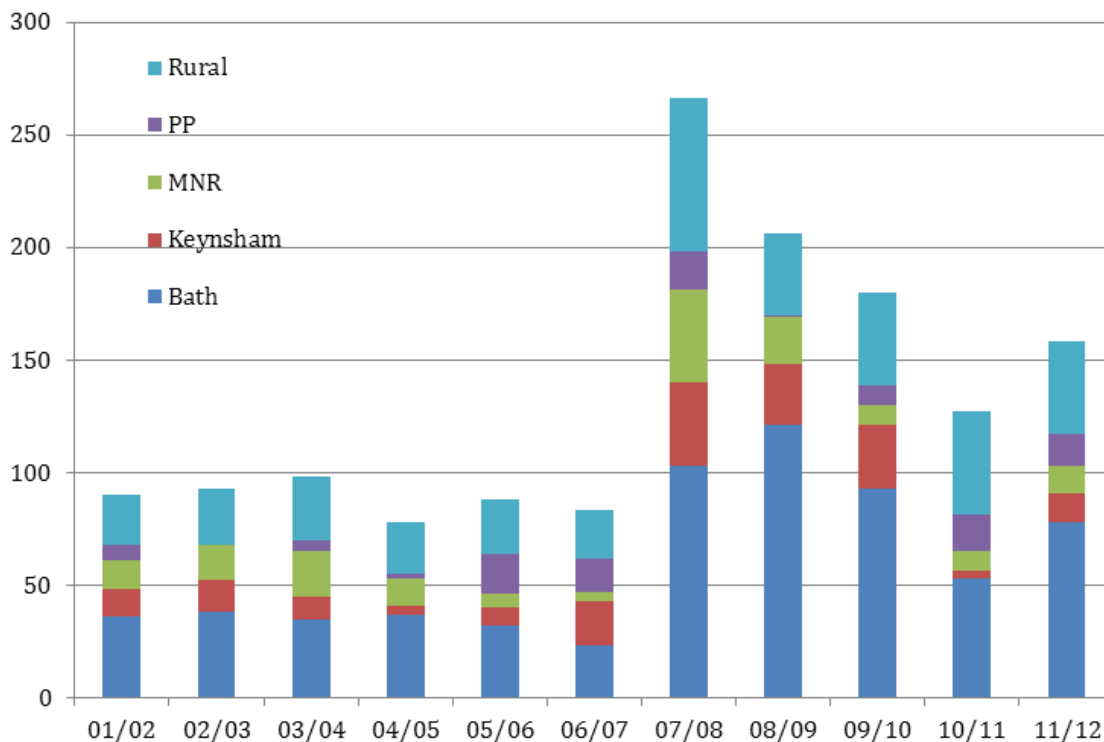
## Windfall Potential from Small Sites

### Evidencing an allowance for windfalls in the five-year supply (NPPF: 48) and beyond (ID/28: 2.5)

3.1 Small sites (below 10 units) have consistently contributed to housing development across BANES.

- Between 2001/02 and 11/12 (last 11 years) housing development on small sites contributed an average of **133 units a year**.
- Between 2001/02 and 2005/06 (first 6 years) the rate was lower and relatively stable at **90 units a year**
- Between 2006/07 and 2011/12 the rate was higher but more variable and averaged **187 units a year**
- Bath has generally accounted for 46% of small site windfalls, Keynsham 10%, Somer Valley 16% and the rural areas 25%

#### Historic small windfall completions data



	01/02	02/03	03/04	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12
Bath	36	38	35	37	32	23	103	121	93	53	78
Keynsham	12	14	10	4	8	20	37	27	28	3	13
MNR	13	16	20	12	6	4	41	21	9	9	12
PP	7	0	5	2	18	15	17	1	9	16	14
Rural	22	25	28	23	24	21	68	36	41	46	41
<b>BANES</b>	<b>90</b>	<b>93</b>	<b>98</b>	<b>78</b>	<b>88</b>	<b>83</b>	<b>266</b>	<b>206</b>	<b>180</b>	<b>127</b>	<b>158</b>

- 3.2 Based on the past rate of delivery the Council considers that a windfall allowance of not less than 100 per annum is clearly justifiable whereas the most recent 5 year average might be optimistic given the downward trend since 07/08. However, using the the eleven year average of rate 133 would not reflect the upward trend in the rate since 06/07. Given that the rate has been in excess of 150 a year for the last 4 of the last 5 years, this is deemed the most reliable windfall forecast.
- 3.3 If this rate of delivery is projected forward for the 5 year supply period 2013/14 – 2017/18 it would yield 750 units from small sites. However, this results in double counting if sites with planning permission are not discounted.
- 3.4 At April 2012, the stock of small sites with planning permission was 500 and the Council is of the view that these will all be implemented within the next 5 years.
- 3.5 During 2012/13 the SHLAA forecasts is that 150 units on small sites will be completed. Monitoring data at 27/01/13 shows that a further 140 units on small sites have gained planning permission since April 2012. At this rate, total new permissions on small sites are projected to have risen to 168 by the end of March 2013. The net effect is that the stock of small sites with planning permission at April 2013 is likely to remain at about 500 (give or take) and the stock of permissions will be replenished<sup>5</sup>.
- 3.6 Against this background the windfall allowance for the next 5 years from 2013/14 would be 250.
- 3.7 The analysis so far has not been adjusted in respect of the need to remove the greenfield windfall component (residential gardens, barn conversions and other previously undeveloped sites). Since 2006, 20% of small site completions have been on greenfield sites. On this basis the unadjusted windfall allowance of 250 (for the first five years) should be adjusted to 200 (or 40 per annum).

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<sup>5</sup> The Council is undertaking further work re the historic rate of replenishment and this will be published in the next version of the SHLAA.



- 3.8 For the purpose of preparing the housing delivery trajectory the Council has assumed that, geographically, these 200 units will come forward in line with their historic distribution (see para1).

#### **Allowance for windfalls and beyond the five-year supply (ID/28, 2.5)**

- 3.9 Projecting forward an unadjusted windfall allowance of 150 per annum for the remaining 11 years of the plan period from 2018/19 to 28/29 would result in a total of 1,650 units being delivered from windfall. Once this figure is adjusted by 20% re the discount for greenfield development, this reduces to 1,320 units (120pa).
- 3.10 Again, for the purposes of preparing the housing delivery trajectory the Council has assumed that, geographically, these 200 units will come forward in line with their historic distribution (see para1).

#### **Windfall Allowance and Affordable Housing**

- 3.11 The Proposed Core Strategy Policy for Affordable Housing re small windfall sites is that sites of 5-9 units will be subjected to an affordable housing requirement of 15-20% (subject to location in the district). There is no affordable housing requirement for sites of 1-4 units. The majority of windfall sites fall within the 1-4 units category. Of the 150 small windfall completions in 2011/12, 35 (23%) were on sites on 5-9 units. Applying a figure of 20% to the longer term windfall allowance of 1320 = 265, which at 15-20% could yield 40-50 affordable units. The yield is will therefore be quite low. Consequently the SHLAA delivery trajectory (appendix 2) does not 'budget' for any affordable housing from small windfalls although they may be forthcoming in small numbers via planning decisions.

## Historic Performance against Local Plan Housing Target for 1996-2011

- 4.1 This section provides a brief overview of B&NES recent experience in relation to housing policy and delivery. The Local Plan housing requirement for the period 1996-2011 was 6,855. Performance against this target at the end of the LP period is set out in Table 4.1.

**Table 4.1: Housing supply position in relation to Local Plan 1996-2011**

<b>Local Plan Target 1996/97-2010/11 (457 pa)</b>	<b>6,855</b>
Dwellings built 1996/97-2010/11 (380 pa)	5,688
Shortfall	1,167

- 4.2 Approximately 83% of the Local Plan target was achieved. The two largest sites allocated for residential development in the Local Plan, GDS.1/B1 'Bath Western Riverside' (450-600 units by 2011) and GDS.1/K2 'South West Keynsham' (500 units by 2011) units did not come forward as anticipated since its examination and adoption. This largely accounts for the forecast shortfall in delivery.
- 4.3 The housing trajectory on the following page sets out housing delivery performance over the lifetime of the Local Plan. It shows that performance during the first 3 years of the Local Plan period was good and enabled delivery to remain on track until about 2000/01. Thereafter delivery failed to keep up with the residual annual requirement. Since 1999/2000 annual delivery has only twice breached the 400 unit mark, in 2007/08 and 2009/10.
- 4.4 The Local Plan shortfall of 1,167 is to be added onto the forward looking housing requirement from 2011. It is assumed that had this been delivered then the Council would have sought to achieve about 35% of this figure as affordable housing. Therefore 400 units of the shortfall is affordable housing related.

## Performance against Core Strategy Target for 2011-2029, including 5 year supply position

5.1 Performance to date is set out in appendix 2 of the SHLAA. This is the housing delivery trajectory and comprises an excel workbook with a separate worksheet for each part of the district and a summary worksheet for the District as a whole and in which the 5 year requirement and supply position is set out.

### Notes accompanying Appendix 2

5.2 The total forward looking housing requirement of the proposed Core Strategy is 7,470. To this has been added the Local Plan shortfall 1,167. This results in a figure of 8,637<sup>6</sup>. The Council is boosting supply to achieve more affordable ho

5.3 For 5 year supply purposes the Council has frontloaded the requirement so that the Local Plan backlog is dealt within the period 2011-2016. Further any shortfall in delivery in the early years of the Core Strategy is not spread out over the entire remaining plan period – it is made up within the next 5 year block. Therefore the data assumes that housing delivery must keep up with the ‘run rate’. This is commonly referred to as the ‘Salford approach’.

5.4 As mentioned in the footnote to paragraph 1.4 of this report, the Council acknowledges that a 20% buffer needs to be abled in respect of 5 year land supply.

5.5 Calculations are based on expected development for 2012/13. Survey and monitoring work is still being collated and analysed in this respect.

5.6 The Council is of the view that is currently has a 5 year supply +20% against its requirement. Indeed onto top the 20% buffer it has a further buffer of 645 units i.e. a 40% buffer overall. The Council’s Proposed requirement has yet to be tested in examination and so little weight can be applied to proposed requirement and these findings at the moment.

### Notes on impact of Interim 2011 based household projections (April 9<sup>th</sup> 2013)

5.7 On 9<sup>th</sup> April 2013 CLG published new household projections for the period 2011-21. For BANES the figure is 4,400. This equates to dwellings projection of 4,532. This is an annualized rate of

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<sup>6</sup> The Core Strategy will deliver 12,700 homes overall due existing commitments and an additional boost to market housing to deliver more affordable housing. This figure results in a large surplus of market housing and which should not form the basis of the overall delivery target against which delivery should be judged. [See Section 3 of Annex 1 to the Council Report on the Core Strategy of March 4<sup>th</sup> 2013.](#)

453.2 and if projected forward equates to 8,157 to 2029. To this figure must again be added the Local Plan shortfall of 1,167. The CLG based total is therefore 9,324.

- 5.8 Whilst little weight can be given to the Proposed Core Strategy related position, appeal inspectors may give greater weight to the interim 2011 based household projections.
- 5.9 The CLG related housing component of 8,157 is 687 higher the comparable Proposed Core Strategy figure of 7,470. On the face of it this reduces the 5 year supply buffer 20% rather than 40%.
- 5.10 An important observation need to be made here. The CLG figure is derived from an ONS population projection that sees high growth in the later teens/ early 20s age group. There are many more 20 year olds projected in 2021 than there are 10 years in 2011. Therefore, much of the growth in population of 20 year olds growth relates not to aging, but not net migration of students into the area.
- 5.11 The CLG household projections are not 'smart' enough to recognise growth in the 18-23 age groups as a continuation of the growth of students. The CLG projections therefore place them within households as non-student young adults using headship rates for this group. In reality these people will not require conventional housing as they will be housed in new on or off campus dedicated accommodation that Bath's universities and other providers are building. In excess of 2000 bedspaces are likely to come forward
- 5.12 The SHMA recognises these nuances and their impact. It therefore strips out any student related growth in households from its figures. In summary then, the CLG derived projection includes students, whereas the Council's SHMA related housing requirement is net of students.
- 5.13 The Council will be exploring this matter further with the authors of the Strategic Housing Market Assessment in the lead up to the Core Strategy examination