

### **Matter 3 Written Statement – CPRE**

Matter 3. Question 14. Do the policies of the plan identify a sufficient supply and mix of sites for the plan period?

In dealing with the issue of whether there is an adequate 5 year housing supply and whether Housing Delivery Tests can be passed over the remainder of the Plan Period, B&NES has opted to base its calculations on the Core strategy figure of 13000 total and 722 per annum dwellings built. CPRE argues that this is mistaken and that the implied boost to housing figures by 1100 is unjustified. CPRE also points to B&NES' apparent confusion that replenishing the supply of sites generates a need to provide for more housing. CPRE also contests the view that housing targets should be regarded as minima because providing more housing than needed, particularly in an area like B&NES where protected landscapes are so prevalent, causes unnecessary damage to the countryside.

CPRE argues that B&NES' approach is unsound because the technical guidance contained in the HDT Rule Book states (para 12) that ***'Where the latest adopted housing requirement figure is less than 5 years old, or has been reviewed and does not need updating, the figure used will be the lower of either the latest adopted housing requirement (Core Strategy) or the minimum local housing need figure (note 12) using the standard method for assessing the minimum local housing need figure set out in national planning guidance'***.

CPRE maintains that the above condition applies as B&NES have reviewed policies relating to housing provision and judged that they do not require updating. Therefore the relevant figure as far as the HDT is concerned is that derived from the Standard method of 676 rather than 722, which reduces the 'need' to supplement housing provision by 368. It also improves the 5 year housing supply issue. Any substantive problems to the achieving successful HDT's and 5 year land supply are exaggerated by B&NES' incorrect application of the rules.

Turning to a broader issue, the shortfall identified by B&NES in the ability to pass future Housing Delivery tests is a result of the test being inappropriate. While recognizing that a Local Plan Update is not the forum to debate national planning policy, the fact remains that the Core Strategy objectives are successfully on target and the only reason B&NES faces a potential problem is that the trajectory of delivery has been front loaded. Much of the requirement has been delivered ahead of schedule (815 dwellings pa till 2021). Therefore, to achieve complete success of the Core Strategy, only 606 dwellings pa need be delivered till the end of the Plan period and the prediction is that completions will number 624pa. Even with the small drop-off in site delivery, Banes need take no further measures to secure a successful outcome. The trajectory was no part of the Core Strategy so cannot be said to influence success or failure, yet the front loaded trajectory achieved in practice means that unless additional provision is made of about 974 houses (appropriately timed) the HDT will fail by

a moderate margin in 2023 and 2024 and by a much larger margin in 2028 and 2029. If, as argued, above, the average rate of build should be 676 as indicated by the standard method rather than 722, this deficiency is almost halved to about 500 with substantial deficits only in 2028 and 2029