

Planning Policy Team
Bath and North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

06 June 2022

Dear Ian,

by email only:
idikemp@icloud.com

RE: Examination of the Bath and North East Somerset Council Local Plan (Core Strategy and Placemaking Plan) Partial Update – Matter 3 – June 2022

INTRODUCTION

These representations are submitted on behalf of Persimmon Homes Severn Valley (PHSV).

PHSV is committed to providing the homes that people need within the Bath and North East Somerset (BaNES) Council administrative area as well as within the greater West of England (WoE) region. Considering the number of homes we build within the region, we are well placed to provide constructive input in to the process of developing new or updated development plan documents such as that proposed here.

Below are PHSV's responses to the Questions from Matter 3 set out by the Inspector that relate to previous representations at the Regulation 19 stage. Each question number relates to the numbering of the Questions provided by the Inspector.

14. The Council has confirmed in its letter of 7 March 2022 (B&NES 1) that the intention of the Plan is to provide a five-year supply of housing sites on adoption. What is the evidence that there would be a five-year supply of deliverable housing sites on adoption of the Plan as per the requirements of the NPPF?

PHSV's submissions at Regulation 19 stage included comments in respect of Policy KE1 and its housing supply reference. Policy KE1 refers to the net requirement for new homes (including affordable homes) for the Partial Update to 2029.

In response to whether 5 years' worth of housing land is available, this is dependent upon the robust assessment of sites with the Council identifying land for homes. Planning policies should identify a

sufficient supply of deliverable homes. The mix of sites should have taken into account their availability, suitability and likely economic viability (NPPF para 68 refers).

The Local Plan should identify specific deliverable sites for years one to five of the Local Plan. Government Policy also recognises that small and medium sized sites play an important part in the meeting a housing requirement (NPPF para 69 refers).

It is therefore a requirement for the Council to identify sites (at adoption of the Partial Review) to meet needs and deliver homes by the end of the plan period. Given that the Council has not moved at this time to a full review or replacement Local Plan, the need for accuracy is all the greater. Preparation of a review or replacement will not be swift nor simple – in part given the current uncertainty surrounding the West of England Combined Authority’s Spatial Development Strategy (SDS) and its effect on the apportionment of housing numbers across the district.

In identifying sites, it is necessary to also consider the following matters:

- Development viability and market signals as a means of responding immediately to any changes to the delivery of sites where there are external influences that have either slowed or accelerated housing delivery;
- infrastructure both on-site and off-site associated with a new development;
- housing delivery in terms of the size and scale of development given that these factors can affect the speed of commencement on site.

All of the above matters are fundamental in understanding the supply of sites.

15. What are the implications of the Environment Act 2021 for the Policy?

The evidence base for the local plan includes a housing trajectory dated August 2021 (CDHOU002) which draws upon March 31 2021 position data and then projects forward first over a five year period and secondly a final three year period to 2029. Should this be the relevant figures to which the Local Plan is based then, with regards to being up-to-date, the 2021/22 Housing Delivery Test (HDT) figures have been included in the evidence base.

Whilst the trajectory suggests that housing delivery will continue across the district there are fluctuations in delivery albeit 3 of the 5 years will fall below the annualised requirement with a significant drop below the annual requirement (722 homes) from 2026/27 onwards. LPPU allocations are therefore seen as essential by the Council as a means of countering any failure of delivery that is reflected in future HDT publications.

It is notable that paragraph 4.25 of the Housing Topic Paper advises that the housing shortfall that is possibly to arise if the oversupply from earlier years is not taken into account is estimated at 4.9 years: and so under the requisite 5 years’ supply. This appears to be counterintuitive inasmuch as the shortfall is predicted to last perhaps a couple of years as the sites identified in the LPPU progress through planning

and construction; yet there is a need to ensure that a 5 year housing supply is maintained. As a result, this suggests:

- there is real uncertainty over the housing land supply and importantly the delivery of homes to the end of the LPPU;
- the decision taken in undertaking just a partial review as opposed to a full review/replacement was wrong.

There are questions surrounding such an approach which allows a shortfall to arise and which lessens the weight placed on an adopted development plan. Therefore it is sensible at this time to promptly review additional sites and include them to add choice to the market in anticipation of a housing shortfall to counter this fundamental issue.

Yours sincerely,



Marcus Plaw

Strategic Planning Manager



