
Bath and North East Somerset Council
Local Plan (Core Strategy and
Placemaking Plan) Partial Update

Examination Hearing Sessions
Matter 3, Questions 14 and 15
Hearing Day 1, 21 June 2022

Written Statement On behalf of Crest
Nicholson Ltd in relation to Hicks Gate

6 June 2022

John Baker Origin3 Ltd

ORIGIN3

Planning . Design . Development

Matter 3: Housing land supply

Issue: Do the policies of the Plan identify a sufficient supply and mix of sites for the plan period?

M3.1 The whole premise of the LPPU is that the Council has to look no further ahead with its Plan than 2029. As covered by question 13, we firmly believe that the LPPU Plan period is wrong, and if this is the case the question would no longer be relevant.

Q14 The Council has confirmed in its letter of 7 March 2022 (BANES 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?

Q14.1 By the Council's letter, BANES1 and the Topic Paper: Housing Requirement and Housing Supply (CD-SD026) the Council concludes that there will be a five-year supply of deliverable housing at the point of adoption of the LPPU. The calculation is subject to various assumptions and the Council notes that with its prediction of near-future completion rates falling below past rates, the supply may sometimes be marginal (ie below five years).

Q14.2 With a Plan horizon of 2029, to maintain a five-year supply at all times moving forward, and to do so through the proper means of preparing a local plan, BANES will have to have a proper plan making sufficient provision in place in 2024, and at April 2024 given the monitoring period base used. Though this is what the Council has suggested it will do, and notwithstanding that this would be 10 years after adoption of the Core Strategy when local plans are to be reviewed every five years, it seems somewhat optimistic given the history of spatial planning in the area. It feels that by its current actions the Council is placing the continued maintenance of a five-year supply of plan-based deliverable housing in considerable jeopardy.

Q14.2 The Council however, in preparing and submitting the LPPU has taken the view that it has no obligation to address any housing need arising from any other part of the West of England Combined Authority area of which it is part, as this requirement will only become known once the WECA SDS. For this examination however, it is now known that the WECA SDS cannot be

expected to appear within any predictable timeframe, and quite probably not at all. The circumstances under which the Council has calculated the supply of deliverable housing at the point of the Plan's adoption therefore have completely changed and the calculation has become invalid. It is quite certain that the annual housing need to be met within BANES in the next five years and beyond is higher than used in the calculation of the predicted number of years of supply.

Q14.3 In terms of the mix of sites, by the same point that this Plan does not address cross-boundary issues when it now has no basis whatsoever for not doing so, the mix of sites making up the planned provision makes no acknowledgement of the spatial geography and demography of the area. A local plan prepared in accordance with the statutory objective of plan-making of promoting sustainable development would identify as part of it housing provision sites in the district on the immediate periphery of the urban area of Bristol, close to where a significant but not wholly met need is arising.

Q15 Do strategic policies include an up-to-date trajectory illustrating the expected rate of housing delivery over the plan period as per NPPF paragraph 74?

Q15.1 The strategic policies do not include such a trajectory, though the Council has included a housing supply trajectory in its Topic Paper: Housing Requirement and Housing Supply (CD-SD026).