

**TOWN & COUNTRY PLANNING ACT 1990**

**BATH & NORTH EAST SOMERSET LOCAL PLAN  
(CORE STRATEGY AND PLACEMAKING PLAN)**

**PARTIAL UPDATE**

**Matter 3: Housing Land Supply**

**Representations on behalf of**

**LiveWest Limited and J E Sheppard Sons (Sawmills)**

**21<sup>st</sup> June 2022**

D2 Planning Ref: 018/22

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**D2**

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*Q14. 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?*

Paragraph 68 of the NPPF states that: -

**“Planning policies should identify a supply of:**

- a) specific, deliverable sites for years one to five of the plan period<sup>34</sup>; and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”**

It is understood that the Planning Authority will update their evidence base on housing delivery for the Examination. It is also apparent that they rely on previous over supply in housing delivery to reduce the housing requirement. This approach would run counter to that identified in the NPPF which indicates that planning authorities should demonstrate a minimum of 5 years worth of housing against the strategic requirements.

Furthermore, with regards specific sites, the Council’s supply of housing sites has a large number of brownfield sites and it is imperative that the Council has up to date evidence on their delivery otherwise the Council will not have a 5 year supply of deliverable sites. Finally, the Council cannot comply with the second part of paragraph 68 of the NPPF i.e. that they identify broad locations for housing development in years 6-10 and also 11-15 years as the Review does not cover such periods.