



Bath and North East Somerset
Local Plan Partial Update

Matter 3 Housing Land Supply

June 2022



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MATTER 3: HOUSING LAND SUPPLY

Q14 The Council 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?

- 1.1.1 Firstly, Gladman consider that the Council should be reviewing the Local Plan and Core Strategy document in full, reviewing strategic policies including the spatial strategy and housing requirement rather than delaying this through the LPPU and seeking to only provide a Plan to demonstrate a five-year housing land supply. This is even more pertinent given the decision in May 2022 by the West of England Combined Authority to halt work on the West of England Spatial Development Strategy.
- 1.1.2 Secondly, the trajectory supporting the examination of the Local Plan Partial Update (LPPU) (CD-HOU022) employs a base date of April 2021 and does not include any of the proposed new residential allocations set out in LPPU nor their anticipated delivery rates or timescales. The Council highlighted in their response to the Inspector's Initial Questions (EXAM1A) that a number of large sites have been permitted and that an updated trajectory would be published by the end of April 2022 with updated information, however this does not appear to have yet being added to the examination library.
- 1.1.3 Taking this into account, Gladman consider that with the current available information it not possible to determine if there would be a five-year supply of deliverable housing sites on adoption of the Plan.
- 1.1.4 Finally, the Council highlight that the proposed residential allocations will seek to address the supply shortfall to the end of the plan period of around 200 dwellings (see paragraph 4.1 of CD-SD026). However, without evidence of deliverability, lead-in times and delivery rates it is difficult to determine whether the proposed allocations

will address the recognised shortfall by the end of the plan period (2028/29) which is less than 7 years away.

- 1.1.5 Indeed, Gladman consider that several of the sites face significant deliverability issues and are unlikely to enable the delivery of housing by 2028/29 and it is unclear as to why the site have been proposed within the LPPU. Further commentary will be provided in response to Matter 4.

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?

- 1.1.6 As highlighted above, the latest housing trajectory was published with a base date of April 2021 and the Council, at the time of writing, have not published an updated housing trajectory which includes updated information for the 2021/22 monitoring year and proposed LPPU allocations.

