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HM M6/0405-08

FAO: MRS A SELF

By post and email:
achris.self@gmail.com

Dear Mrs Self

**RE: RESPONSE TO THE INSPECTOR'S QUESTIONS ON THE SOUTH SOMERSET LOCAL PLAN
APRIL 2013**

We represent the **South West HARP Planning Consortium** which includes all the leading **Housing Association Registered Providers** in the South West.

We make some general observations followed by more specific application to the South Somerset plan.

Regional Spatial Strategies

Despite the abolition of the RSSs, the evidence base produced to support the strategies remains robust due to the rigorous testing and consultation it received throughout the policy formation process. The value of the work conducted for the RSSs is shown in paragraph 218 of the NPPF which confirms it to remain a material consideration:

"Where it would be appropriate and assist the process of preparing or amending Local Plans, regional strategy 41 policies can be reflected in Local Plans by undertaking a partial review focusing on the specific issues involved. Local planning authorities may also continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence".

Some inspectors have drawn on the RSS evidence base when reaching their planning appeal decisions. One such example is Forest Ridge and land rear of, Old Brighton Road, Pease Pottage, West Sussex (APP/D3830/A/12/2184075, 26/03/13). In this case the Inspector relied on the housing figures of the South-East Plan, now revoked, as follows:

"As the South East Plan contains the most up to date housing figures tested at examination, the Council also accepts that the SEP housing numbers, even post revocation, would remain a material consideration to the appeal – against which the Council cannot demonstrate a five year supply of housing" (paragraph 70).

The application of RSS evidence as a material consideration applies equally to Core Strategies/Local Plans. We will therefore seek to ensure that emerging policies in Strategies/Plans are generally in conformity with the level of growth set out in the relevant RSS, even after that has been revoked. We will not support a proposed housing target that is markedly different to that of the RSS if there is no robust evidence to the contrary, for example in a Strategic Housing Market Assessment (SHMA). We will expect the SHMA to fully set out the workings and assumptions that have been used to derive the alternative figure. We will check that this incorporates any cross-border growth needed across a housing market area or sub-region in order to fulfil the purpose of the Duty to Co-operate. Finally, we will seek to ensure that proper account has been taken of population/household trends, see below.

Household Projections

The 2013 2011-based household projections have been published on an interim basis to help local authorities forward plan for the next ten years. They are not able to take full account of 2011 Census data at this time, as analysis is still underway, and they do not project forward for the full 25 years. On behalf of CLG, the Office for National Statistics indicates that a more refined set of household projections will be released in December 2013/January 2014 once the entirety of the latest Census data has been integrated.

Local authorities are therefore advised to use the current dataset with caution for plan making. On account of their various limitations, CLG warns against use of the interim projections on their own in its comments on accuracy in its Quality Report of April 2013 (see www.gov.uk/government/uploads/system/uploads/attachment_data/file/184122/QualityFinalDraft_v4.pdf):

“users are discouraged to give too much weight to household growth estimates for particular years and advised to focus instead in growth averages through the projection period”.

Moreover, until the 2011-Census compliant projections are released later in the year, local authorities are advised that: *“if users need to assess housing requirements beyond 2021 they should make an assessment of whether the household formation rates in that area are likely to continue”.*

When taken together, these comments from CLG indicate the need for locally-specific, trend-based analysis of population and household growth across a plan period. We will seek to ensure that they are not reliant on the interim projections as a single snapshot in an attempt to justify a significantly reduced housing target. This reinforces the importance of SHMAs in plan making. In that vein, we also reiterate the requirement, under the NPPF, for local authorities to ensure that affordable housing needs defined in their SHMAs are fully met including by accommodating any backlog accrued under an old plan in the housing target. The interim projections in no way diminish or remove the statutory obligations the Council has in this regard. Any backlog that has accrued is more than likely to reflect the current unmet housing need of those least able to compete in the housing market as reflected in homelessness and housing register data.

We are particularly concerned in South Somerset that the under-provision of homes over the period preceding the local plan should be addressed. Between 2006 and 2012 South Somerset District Council delivered an average of approximately 655 homes per annum, about 70 less than their strategic requirement of 725 per annum. This leaves a shortfall of over 400 homes which needs to be met despite downward revisions of household projections. (Figures estimated from 2011/2012 Housing Monitoring Report, Housing Trajectory Graph).

We are also concerned about the time period the interim household projections cover, as the 2011 based household projections only consider up to 2021 rather than the whole plan period to 2028.

The household projections do support our representations on the importance of planning for older people's housing. Nationally, the projections show that the number of over 65's households will increase by almost 20% from 5,950,000 to 7,108,000. This new evidence justifies the need to plan for specialist older people's housing within the district.

These comments are intended to be constructive and we look forward to being kept informed of the examination process as it develops. We ask that the **South West HARP Planning Consortium** is retained on the Council's consultation database with **Tetlow King Planning** listed as their agents

Yours sincerely



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ASSISTANT PLANNER
For and On Behalf Of
TETLOW KING PLANNING

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