

BATH AND NORTH EAST SOMERSET - CORE STRATEGY EXAMINATION

AGENDA - ISSUE 1: OVERALL SCALE OF PROVISION OF JOBS AND HOMES

The agenda broadly follows the structure of the questions set out in ID7 focussing on matters I want to explore further.

Overall approach to the scale of housing required

1. Has the Council had appropriate regard to the balance of factors listed in PPS3, paragraph 33? In particular:

- Is the Council justified in not placing any direct reliance on any household projection? (Box 1 Topic Paper 9 CD/6/S10)
- Is the Council justified in giving little weight to the most recent (2010) published household projections? The Council's main concern appears to be that this includes a *spike* in international migration (see Section 8 Topic Paper 9 CD/6/S10). Is this justified?
- How has the substantial need for affordable housing identified in the SHMA influenced the overall level of provision?
- How has the Council taken into account the Government's ambition to improve affordability and increase housing supply?

2. If the requirements of the draft NPPF in relation to planning for housing and employment were to become national policy before the close of the Examination, would planned provision meet those requirements (in particular paragraph 28 in relation to housing requirements)?

3. Is the Council's methodology for calculating the housing requirement consistent with existing and emerging national policy?

- Is a jobs/housing ratio (whatever the precise figure) a reliable indicator of housing need and demand for a housing market with the characteristics of B&NES? If not, is there particular justification for using it here?
- Is a ratio derived from pre-recession economic projections and a 2004 population projection a good guide for a ratio to be used now?
- Is a ratio derived from jobs and household projection for the whole of the West of England sub-region appropriate for B&NES, bearing in mind that this ratio is not being used by all the other authorities in the sub-region?
- The Council's approach appears to be to accept migration into the district only in so far as is required for projected increase in the labour force (see 2.21 and Section 8, Topic Paper 9 CD/6/S10). Is this justified/compatible with national policy?
- The Council's methodology seeks to ensure that there is an adequate labour supply to meet labour demands within the sub region (see Box after 3.1, Topic Paper 9 CD/6/S10). Why does the Council regard the calculated requirement of 12,100 as a maximum requirement rather than a minimum?

- If a job/homes multiplier is to be used in determining the housing requirement is the Council's multiplier of **1.39** reasonable?
- The multiplier is applied to the net planned job growth (8,700) which requires many more new jobs to off-set losses. Does the methodology adequately address the provision of labour for all these new jobs given that when local jobs are lost, the local labour force available for new jobs may not increase by the same amount? (eg MOD workers retaining their jobs but still residing in Bath when the jobs move from Bath to Bristol; people retiring early.)

4. Is the Council's methodology transparent and capable of being monitored for its future utility? How would the housing requirement be re-assessed in the future? How would the multiplier of 1.39 be reviewed?

5. Does the methodology adopted, and proposed provision below the calculated requirement, meet Core Strategy Objective 5, bullet 1? If not, should the objective or planned provision change?

6. Is the Council justified in not making additional provision to off-set the shortfall against intended delivery in the Local Plan to 2006 of 850 dwellings? (TP9, 6.3-6.5 and CD4/H13, 3.1-3.4.)

7. Should the Core Strategy demonstrate how housing supply will be maintained over at least 15 years from adoption to comply with PPS3 paragraph 53? If so, how? (*Question moved from Issue 2 in ID/7.*)

Economic/Job Growth forecasting

8. Is the Council's assessment of likely economic growth/job creation over the plan period in the district reasonable or too optimistic/pessimistic? Given the inherent uncertainties of long term economic forecasting, particularly at present, what is the appropriate approach in the Core Strategy to economic/job growth?

9. What assumptions about population/household growth in the district are embedded in the estimate of 8,700 net new jobs? Do the Council's assumptions allow for any economic growth from additional housing? If not, is this a relevant consideration?

10. Do the assumptions and overall intentions satisfy the aim of the Ministerial Statement: *Planning for Growth* (23 March 2011) in particular the Government's expectations in the 4th paragraph: *Local planning authorities should...?*

11. Is it reasonable for the Council in the Core Strategy to plan for less job growth than the Council is supporting through the LEP? Although the LEP projections and the Core Strategy cover different periods, it appears that the LEP is more ambitious for the period 2010-2020. Is this correct?

The spatial/practical implications

12. Have the cross boundary implications of the strategy been properly taken into account (both within and outside the sub-region)?

- Do the assumptions of the methodology used (e.g TP9 2.21 first sentence and in the box after 3.1) have potential implications for adjoining authorities?
- A number of representations consider that Bath & NES should plan for some of the housing need/demand of Bristol City. The Bristol Core Strategy (CD3/15) does not specify any potential unmet demand, but is to be reviewed after 5 years to reassess housing requirements. What is the appropriate response for Bath and NES to this uncertainty?
- The Council acknowledges (BNES/5 2.12.2) the concern of Mendip DC regarding potential increased housing pressure in places like Frome, arising from the gap between the requirement and planned provision, but does not regard it as significant. If net migration is greater than allowed for in the model, would there be more serious cross border impacts?

13. Would planned provision provide a more sustainable relationship between homes and jobs in the district and at Bath City? Would the provision of more homes than currently planned have a beneficial effect on commuting patterns? BNES/5 2.11.2 suggests a marginal improvement in self containment from the provision of 6,000 homes and 5,700 jobs at Bath. How is that assessment compatible with Council's use of a 1.39 multiplier for jobs to homes and the figures for the district as a whole?

Flexibility and Review

14. What flexibility exists within strategy if the Council's assessment of growth/job creation or delivery are not borne out?

15. Core Strategy paragraph 7.05 anticipates a review of the Core Strategy every 5 years.

- Is a review a reasonable response to uncertainties or inconsistent with the intended long term focus of Core Strategies?
- If a review is appropriate should the Core Strategy be more explicit about what would be reviewed/when and what might trigger a contingency or review of the spatial strategy. Should any review be undertaken jointly with other authorities in the West of England?
- Should a spatial contingency be an explicit part of the strategy?

It is anticipated that discussion of these matters will need to be continued on Day 2.

**Simon Emerson
Inspector
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