

**Hearing 17<sup>th</sup> September 2013- The scope of the Strategic Housing Market Assessment (SHMA)**

**Questions for Pre-hearing statements ID/35 (Inspector's text/questions in bold)**

**3.1 The overarching question for this hearing is: In the context of the Examination to date, including my preliminary conclusions on strategic matters in June 2012, does the geographic coverage of the Council's new SHMA (CD9/H4) in relation to Housing Market Areas provide an adequate basis for the objective assessment of housing needs in accordance with the NPPF? If not, is any departure from national policy justified?**

**Overview**

1. For the reasons set out below, the geographic coverage of the Council's new SHMA (CD9/H4) in relation to HMAs provides a sound basis for the objective assessment of housing needs in accordance with the NPPF and with Government Guidance on the identification of housing market areas ("HMAs").
2. The first relevant stage in production of an appropriate SHMA is to identify the relevant HMA(s). The appropriate geographic coverage of a SHMA is then based on a best fit of the HMAs with local authority boundaries.
3. As noted in the draft Report of Findings by ORS ("the ORS Report") para 2.2 (CD9/H4), the DCLG issued an Advice Note on "Identifying sub-regional housing market areas" in 2007 ("the 2007 Advice Note"). In November 2010, after the 2009 West of England SHMAA was produced, DCLG issued a further report prepared by CURDS following detailed statistical analysis - "Geography of Housing Market Areas" ("the CURDS report"- CD9/H8) which explored a number of possible approaches to identification of HMAs.
4. Both these documents have been retained post NPPF and were considered and applied in the formulation of the ORS Report and in particular in the identification of the relevant HMA.

5. We consider the detail later, but headline points are outlined below:
- a) at the first stage of the CURDS process of identifying the appropriate HMA, *ward level* census data on travel to work ("TTW"), migration data and house price data is used to produce "gold standard" HMAs based on the appropriate degree of self-containment ("closure"). Those "gold standard" HMAs may not (and in the case of the west of England, do not) follow local authority boundaries;
  - b) at the first stage, CURDs did not identify the vast majority (80%) of B&NES population as being within a wider Bristol HMA. Instead it identifies the vast majority of B&NES' population as within a Bath HMA. At a ward level, the wider Bristol HMA extends only to the A39 Highway (see Figures 1 and 2 of the draft SHMA an enhanced resolution map is set out in **Annex 1** to this response).
  - c) The ORS methodology (although slightly different from CURDS) gives the same picture re: extent of the wider Bristol HMA and the fact that it includes only a small proportion of the B&NES population. The overriding picture is of B&NES being predominantly Bath focussed. There are thus two distinct "gold standard"/ ward level HMAs operating in B&NES with the vast majority of B&NES focussed not on Bristol but on Bath and within the Bath HMA and not the wider Bristol or WoE HMA;
  - d) at the second stage of identifying the appropriate HMA, it is necessary to produce a "best fit" to the gold standard HMAs using whole local authorities/local authority boundaries to generate what CURDs refers to as "silver standard" HMAs. As DCLG and CURDs recognise and advise, these best fit HMAs are necessary in order to make the available data suitable for strategic and local planning purposes;
  - e) at the second "best fit" stage, CURDs consistently assesses the whole of B&NES as being in a separate HMA from Bristol City Council ("BCC"), South Gloucestershire ("SG") and North Somerset ("NS") – the wider Bristol. The silver standard HMA treats B&NES as separate from Bristol and rather as part of an HMA including parts of Wiltshire and parts of Mendip;
  - f) for reasons addressed in detail below it is not appropriate or possible to adopt that wider HMA (with Mendip and Wiltshire) to the east and south of Bath here;
  - g) cross boundary issues between: (1) B&NES and the wider Bristol HMA; and (2) between B&NES and Wiltshire and Mendip would be addressed through close joint working;
  - h) thus, at present and on the current evidence base, the current "best fit" SHMA to cover B&NES is B&NES alone because:

- (1) 80% of the population and households is within the Bath and not the wider Bristol HMA – to treat B&NES as a whole as part of the wider Bristol HMA would be inconsistent with the basic facts underpinning the CURDS and ORS analysis;
  - (2) neither the CURDs nor the ORS HMAs show a single HMA for the WoE and the current evidence base is inconsistent with identification of a single HMA for the WoE including the whole of B&NES;
  - (3) for reasons which are addressed in detail below, it is not appropriate or possible now to include the whole of Wiltshire or Mendip within a Bath HMA; and
  - (4) B&NES is therefore a reasonable proxy for the sub-regional Bath HMA identified consistent with up to date government guidance which survives the NPPF.
6. As noted in Annex 1 to the B&NES Council Report to in March 2013 (para 3.5) (CD9/PC3) B&NES will participate in the WoE SHMA process as it comes forward. If in the initial stages of the work, new census data (2011) shows that B&NES should be treated as part of the wider Bristol HMA using the CURDS approach then that will be done. If not, then B&NES will nonetheless engage under the duty to co-operate and in accordance with its own review requirements, to ensure that cross boundary issues with wider Bristol HMA are addressed at that stage.

## **Detail**

### The 2007 Advice Note

7. The 2007 Advice Note (CD9/H7) considered the factors which would influence the identification of sub-regional HMAs. That advice was carried forward in the CURDS report.
8. The 2007 Advice Note (para 9) also noted the need for pragmatic use of local authority boundaries in formulating the HMAs: (the precursor of the CURDs “best fit” or “silver standard” HMAs):

*“The extent of sub-regional functional housing market areas identified will vary and many will in practice cut across local authority administrative boundaries. **For these reasons, regions and local authorities will want to consider, for the purposes of developing evidence bases and policy, using a pragmatic approach<sup>1</sup> that groups local authority administrative areas together as an approximation for functional sub-regional housing market areas.**” (Not our emphasis but the footnote is our addition)*

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<sup>1</sup> For example official sub-national projections of population and households are not made below the local authority level

9. As we shall show, based on the evidence available, the appropriate, pragmatic approximation for the Bath HMA is B&NES.

*The ward based/ Gold Standard HMAs*

10. The 2010 CURDS report post-dated the 2009 WoE SHMA. CURDS criticised the then existing HMAs (chapter 3<sup>2</sup>) and undertook detailed statistical analysis of the factors (and the degrees of closure) which were appropriate in determining HMAs. The key relevant factors were TTW, migration and house prices. Various closure assumptions were then used to identify appropriate HMAs. A range of possible HMAs for each broad area were identified and the preferred (statistically most valid) HMA then recommended.
11. The results of the CURDS work in this general area show that (at *ward level/ "gold standard"*) there are two distinct HMAs in B&NES – with the area roughly to the east of the A39 Highway within the Bath HMA (approximately 80% of the population and households) and only that to the west in the wider Bristol HMA. See the plans at figures 1 and 2 on page 9 of the draft SHMA and an enhanced resolution map which is set out in **Annex 1** to this response.
12. The Plan in **Annex 1** shows the CURDs recommended "gold standard" HMAs. There were a number of variations of this plan depending on the parameters and assumptions used. All of them show Bath HMA as distinct and separate from the wider Bristol HMA (with broadly the A39 Highway being the dividing line).
13. The important point is that, on current evidence and 2001 census data, the 2010 CURDS report does not currently identify a WoE HMA as the correct HMA to adopt for the purpose of (i) generating an evidence base; or for (ii) policy making.
14. Whilst the ORS report develops the CURDS approach and uses slightly different figures from it<sup>3</sup>: (1) the CURDS analysis was well understood and was taken into account by ORS (see para 2.3 of the ORS Report); and (2) ORS analysis also provides compelling evidence of a separate Bath HMA with the A39 Highway as the dividing line between it and the wider Bristol HMA at a *ward level*.

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<sup>2</sup> Which included the then 2009 WoE HMA

<sup>3</sup> Slightly different assumptions being made on TTW closure, migration closure and house prices.

### Identification of Silver Standard/Best Fit HMAs

15. The 2007 Advice Note (see para 9 above) and the CURDS Report 2010 (see e.g. p14 and p30) recognises that because of data availability and practical working arrangements it is necessary to produce a "best fit" based on local authority areas for the preparation of SHMAs because it is not appropriate to prepare SHMAs by splitting local authority areas internally and relevant data is primarily only available at a local authority level: see e.g. para 9 of 2007 Advice Note and p14 of the CURDs report.
16. This does not mean that wider geographical issues are ignored if parts of one local authority area have functional relations with (and are part of a gold standard HMA covering) parts of adjoining silver standard HMAs or local authority areas. Rather those cross boundary issues are taken into account in plan-making through joint working (and the duty to cooperate, where applicable) as has been done here.
17. Thus, if Bristol had identified an unmet need in its HMA which should be met to the east of Bristol, joint working across silver standard HMA boundaries would cater for that. Further, if in the future a SHMA for the wider Bristol HMA<sup>4</sup> identifies a need which should be met to the east of Bristol, that will be accommodated through joint working under the duty to co-operate and under the plan review.
18. In the light of the advice in the 2007 Advice Note, the CURDS work produced a set of 'silver standard' HMAs. These represent the best possible match to the original ward based definitions that are obtainable by grouping whole local authorities.
19. Importantly, the CURDS silver standard/ best fit HMA does not subsume the Bath HMA into a wider Bristol HMA but treats B&NES as part of a separate HMA. Therefore, at present, there is no evidence to justify treating B&NES as part of a WoE HMA on a best fit basis.

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<sup>4</sup> We consider the steps in the future to the assessment of the appropriate extent of the HMA under the WoE process.

### The Bath HMA

20. The CURDs gold standard Bath HMA takes in a number of market towns in Wiltshire and Mendip<sup>5</sup>. The CURDS silver standard/best fit work groups B&NES and the whole of Mendip together; and Wiltshire as a separate HMA to the east.
21. That is one possible approach (based on CURDs geographic coverage alone). However, there is other evidence to take into account in identifying the appropriate HMA, in particular the TTWA areas (reproduced at **Annex 2**), the approach of other authorities and the ORS conclusions.
22. The ORS Bath HMA is a very close reflection of the Bath TTW Area - see **Annex 3**. The only substantive difference between the two functional geographies is that the Bath TTWA includes the town of Frome (26,000 people, 11,800 dwellings and 25% of the Mendip total) whereas the ORS Bath HMA excludes Frome. The background data behind the Bath TTWA shows that the supply side self containment is 72.9% and the demand side self containment is 75.8%.
23. The issue at silver standard stage therefore becomes whether Mendip should be treated as part of the Bath HMA. In that regard, it is highly relevant that a significant majority of Mendip falls not in the Bath TTWA but in the Wells/Shepton Mallet TTWA. There are thus two HMAs operating in Mendip, with the Bath HMA only covering a relatively small minority of Mendip.
24. Given that:
- a) only a small part of Mendip has a close physical and functional relationship with Bath; and
  - b) the Bath TTWA is a reasonable proxy for the Bath HMA;
  - c) the Wells and Shepton Mallet TTWA is a reasonable proxy on a best fit basis for a Mendip HMA and covers a significant majority of Mendip;
  - d) the CURDS work identifies a separate HMA for Wells/Shepton Mallet at gold standard stage; and
  - e) Mendip itself is not promoting a joint HMA with B&NES,
- it is considered that, as a best fit, Mendip and B&NES should be treated as separate HMAs at the silver standard stage.

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<sup>5</sup> The ORS methodology shows the Bath HMA penetrating less deeply into Wiltshire and Mendip and does not take in any market towns in those areas. This difference is explicable because the ORS seeks to define the HMA based on at least 65% closure whereas the CURDs approach uses 75 – 77.5% closure together with some migration and house price variables.

The Best Fit

25. The current best fit for SHMA purposes is B&NES alone because:
- a) 80% of B&NES (by population and households) is within the Bath HMA;
  - b) Whilst at gold standard stage small parts of B&NES population are within a wider Bristol HMA at best fit stage there is no current evidential basis for treating B&NES as a whole as part of the wider Bristol HMA;
  - c) Neither the CURDS nor the ORS work shows a single HMA for the West of England or the wider Bristol HMA subsuming Bath; and CURDs treats B&NES at best fit stage as part of a separate HMA spreading east and south rather than west and north;
  - d) The ORS approach only includes relatively unpopulated rural areas in Mendip and Wilts in the Bath HMA and this geography closely reflects the extent of the Bath TTWA;
  - e) Whilst Frome itself forms part of the Bath TTWA (with 1,600 commuter movement to the city of Bath (2011 Census)), the other 75% of Mendip is more strongly linked to the Wells & Shepton Mallet TTWA and does not form part of a larger Bath HMA sphere of influence ;
  - f) Neither Mendip nor B&NES consider that a best-fit HMA is a B&NES/Mendip geography. The Bath TTWA is a reasonable proxy for the Bath HMA and the Wells/Shepton TTWA is a reasonable proxy for a Mendip HMA and SHMA. Whilst a joint SHMA is not necessary it does not prevent joint working re plan-making based on the outputs of separate studies (particularly in respect of the impact of B&NES housing delivery policies for Frome).
  - g) Wiltshire was not included in the silver standard Bath HMA. Unitary Wiltshire has prepared a SHMA for the whole county (with three subdivisions). The former area of West Wiltshire (within the Bath gold standard CURDs HMA) was included within the Wiltshire HMA on the basis of the 'best-fit'/'silver standard" approach. The geographical coverage of the SHMA was not challenged by the Inspector charged with the Wiltshire Core Strategy examination (i.e. he held a full set of hearing sessions based on the evidence base before him and did not suggest that the SHMAA was based on a flawed HMA);
  - h) ORS, CURDs and TTWA geographies do not currently evidence or justify a single HMA for the West of England. Plainly there is a functional link between part of B&NES and Bristol. The key question is whether to treat the whole of B&NES as part of a West of

England HMA for SHMA purposes. The evidence at this date does not support doing so because 80% of B&NES is in an undeniably separate HMA. The best fit is therefore a SHMA for B&NES;

- i) B&NES is therefore a reasonable proxy for the sub-regional Bath HMA and the production a SHMA on that basis is justified. To pursue any other geographical basis for a SHMA now would not be consistent with the current evidence (and would not therefore be to pursue a disproportionate evidence base - NPPF 158).

#### Treatment of Cross Boundary Issues

26. This does not mean that cross boundary issues (where evidenced) are ignored. Knowledge of the gold standard strategic Bristol and Bath HMAs within the B&NES SHMA enables the sustainability or impact of the proposed spatial strategy for accommodating the housing requirement for B&NES to be scrutinised against the functional geographies that are operating in the area. This knowledge enables B&NES to consider the impacts of its plans on neighbouring areas, identifies neighbouring locations where any unmet need arising could be accommodated, and areas which might require B&NES to accommodate their unmet needs (once evidenced).
27. Further, the ORS Report enables the Council to consider how the gold standard HMAs might influence the strategy for accommodating housing in the district. It suggests for instance what element of employment-led housing needs and migration led housing needs might be generated from the 20% of B&NES that is within the wider Bristol HMA. This is carried forward at para 8.72 of the ORS Report (employment based distribution of housing within B&NES).
28. In respect of evidenced housing needs in Wiltshire and Mendip there is currently no unmet need that implies a role for B&NES in addition to what is already set out in the B&NES SHMA.
29. The time for B&NES to partake in plan-making in respect of the wider Bristol HMA is when a WoE led SHMA is produced and the local authorities begin to consider strategic options. No such study has been substantially progressed since July 2012 to evidence immediate or longer term needs in the wider Bristol HMA that might need to be met in B&NES. Furthermore, the adopted Bristol Core Strategy does not identify an unmet housing need to be accommodated in adjoining districts (and in the event that there was a shortfall in housing provision, it, has identified a contingency). Were it to be concluded that a land supply solution was required in B&NES, such a



scenario would represent changing circumstances and NPPF para 153 recognises the scope for partial review to enable Local Plans to respond flexibly.

30. The first stage in a comprehensive review of the 2009 West of England SHMA would be to identify TTWAs and HMAs (based on as yet unpublished 2011 Census data). TTWA data is expected in spring 2014. This exercise will also, no doubt, take into account 'The Geography of Housing Markets in England' (CLG, 2010). Based on the current ORS/CLG related evidence base it is not clear that B&NES would be considered to be within a wider Bristol HMA. The Census data would have to show a very significant shift in the TTWA of Bristol eastwards to subsume Bath. The assessment of new data will lead to an identification of the appropriate HMA. Whether B&NES is within it (or outside it) it will co-operate with issues arising from it including through its own Review to make further land available around Bristol if found to be necessary through the WoE SHMAA.

#### Conclusion

31. In the light of all the above, it is the Council's case that its work has shown that it has a clear understanding of the housing needs of its area (NPPF 159).
32. On current evidence the only arguable gap is the exclusion of Frome from the HMA. However, this is justified for the reasons given above. In any event, B&NES is well aware of the implications of housing provision in B&NES on the periphery of the Bath HMA (i.e. Frome). Mendip has produced a SHMA evidence base, which, sitting alongside the B&NES SHMA provides good evidence of the housing requirements across the districts to meet the requirements of the NPPF. This is a proportionate evidence base to address this issue. Moreover, as described above, the evidence supports the production of a SHMA for the district of B&NES and there is nothing in the Mendip evidence base that point to a need for B&NES to meet any unmet need.

## Housing Market Areas – Inspector’s Commentary

**3.2 There is no evidence to indicate that B&NES forms a single HMA confined to its administrative boundary. The West of England SHMA 2009 (CD4/H11) included B&NES within a single, wider-Bristol HMA which also extended beyond B&NES into parts of Mendip and Wiltshire. The Council’s new SHMA concludes (2.12-2.16) that B&NES should be divided between two, Tier 1 (strategic/framework) housing market areas. The western part of B&NES being part of a Bristol focused, tier 1 HMA and Bath and the east/south of the district coming within a larger West Wiltshire/North Mendip Tier 1 HMA, within which the city of Bath, its environs and south B&NES and a small extent of Wiltshire and North Mendip form a Tier 2, local HMA. The new SHMA does not make any further use of its analysis of HMAs and assesses a housing requirement for B&NES for the district as a single entity on its own. Given the particular focus of this hearing, I will not want to spend a disproportionate amount of time reviewing technical material concerning possible definition of relevant HMAs, since it is clear that B&NES does not form a single HMA in isolation.**

33. The case that B&NES forms an HMA is set out in the preceding paragraphs.
34. There is strong evidence that on a best fit/silver standard basis, B&NES is not part of the wider Bristol HMA (as per the response above to the Inspector’s question 3.1).. To include it as such on present data would be inappropriate.
35. The WoE SHMA 2009 (CD4/H11) did include B&NES within a single WoE HMA but that is now of historic interest. The recent, more detailed and more sophisticated work endorsed by the CURDs approach reviews the evidence underpinning the 2009 WoE SHMA and reaches different conclusions.
36. It is correct that at the “gold standard”/ “ward level” stage, 20% of B&NES population is within the Bristol focussed HMA but that is not the case at “best fit” stage.
37. It is not correct that the ORS Report makes no further use of the analysis of the “gold standard” HMAs. The division of B&NES between the wider Bristol and Bath HMAs is reflected in para 8.72 and Figure 55 (of the ORS Report). This models the required housing split between the two parts of B&NES from an employment-led perspective.

38. Whilst not shown in the ORS Report, it is relevant that 80% of the people and household in B&NES are in the Bath HMA. Further 80% of B&NES growth in the last 10 years has been in the Bath HMA. On this basis it is reasonable to assume that (absent of any major allocation to the east of Bristol following a WoE SHMA exercise) 80% of future trend based migration and household growth might also be generated by the Bath HMA in B&NES and 20% to the wider Bristol HMA in B&NES. This ratio can be applied to all trend migration-led scenarios in the Draft SHMA and in the Addendum SHMA (CD9/H4/1). The geographical distribution of new housing in the Proposed Changes to the Core Strategy reflects this ratio.

### **3.3 On the basis of the information currently before the Examination, what is the most reasonable and appropriate conclusion as to the appropriate HMA(s) for B&NES**

39. According to the CLG advice, and based on the TTW, CURDS & ORS evidence summarized above, either B&NES-Mendip or B&NES alone form appropriate HMAs. However, the most appropriate "best fit" HMA, especially in light of the ORS evidence, is a B&NES HMA.

### **3.4 Does the Council accept, or not, that as CD9/H4 is a SHMA for B&NES only, it does not:**

- **address one of the 5 main concerns I identified with the Council's previous housing assessment methodology (Annex of ID28, paragraph 1.9);**

40. In respect of ID/28: para 1.9, the Council accepts that the SHMA that it has produced does not cover the West of England area. The reasoning for that is explained above, which addresses the concern raised in ID28. Based on the current evidence, it is not considered that a WOE SHMA including all of B&NES is either justified or needed for soundness in the context of NPPF paras. 47 and 159. Evidence within the ORS Report and the CURDS report shows that the West of England Partnership area is currently neither a gold standard strategic HMA, nor is it currently a silver standard strategic HMA.

41. The release of 2011 Census travel to work data in Spring 2014 may reveal changes to the functional geographies with the former Avon area and the implications of this will be considered through the review of the WoE SHMA.

- **comply with NPPF paragraphs 47 and 159 and therefore does not accord with one of the items of required further work in ID28, paragraph 7, namely the identification of the housing requirement in a manner consistent with the NPPF;**

42. It is not accepted that the B&NES approach does not comply with para 47 and 159 of the NPPF. As outlined in the responses above. The approach of identifying the appropriate HMA (gold standard) and then using a best fit (silver standard) to provide a pragmatic approximation is sound and in accordance with government guidance and with the NPPF. There is no current evidential basis for subsuming the 80% of B&NES into a WoE HMA. Applying the best fit to the available data shows that undertaking of a separate SHMA for the whole of B&NES is justified.

- **reflect the scope of the work that the Council envisaged undertaking when seeking a suspension (BNES39, penultimate paragraph);**

43. The Council when seeking a suspension did not anticipate that the required co-operation for a review of a WoE SHMA exercise would be forthcoming at this stage.

44. The timeframe for the future sub-regional work has always meant that it was neither realistic nor possible to bring forward a WoE SHMA and a Core Strategy based on it in the one year adjournment of this Core Strategy. The Inspector recognised this in ID28 para 1.35:

*“This leaves the evidenced base for the Bath and NES Core Strategy in limbo. I recognise that the Council cannot undertake this task alone and those Council’s with adopted Core Strategies may be in no rush to undertake the necessary joint work.”*

45. This was the context for the Council’s response letter of 12<sup>th</sup> July (BNES 39) seeking a suspension of the Core Strategy examination. The clear (and legally correct) response of the Council was that it needed a Core Strategy as quickly as possible (as per NPPF para 184) notwithstanding that point. The Council’s letter set out just five months for the review of evidence (including housing land requirement) – see timetable box within this letter. The timetable proposed would never be sufficient to produce a complete WoE SHMA and to determine how its requirements should be split between the authorities. The Council could not have overcome the problem as identified by the Inspector in para 1.34 – 1.35 at this stage as the WoE work would necessarily be undertaken in a longer time frame. In the meantime, the Council continues to liaise with, and co-operate

with other authorities to ensure that a WoE review is undertaken within an appropriate timeframe.

46. The Inspector's letter goes on as to what the Council could do in those circumstances:

**“Paras 1.35& 36 of ID/28 have significant implications for the Council. You state that a cross-boundary SHMA and the determination of the optimal spatial distribution of identified needs around Bristol requires joint working between the relevant authorities. However, he [sic] acknowledges that the Council cannot undertake this task alone and those Councils with adopted Core Strategies may be in no rush to undertake the necessary joint work. You conclude that this “leaves the evidence based for the B&NES Core Strategy in limbo”. These circumstances relate to both the suspension and the withdrawal options [in other words the problem arises whichever route is followed – the Council will have to pursue its Core Strategy through one route or another without the WoE SHMA]. To enable B&NES to progress the Core Strategy [as it was required to do it not being permissible for it simply to wait on a WoE SHMA] and to ensure that the duty to co-operate is met, B&NES will agree an approach to working with neighbouring authorities. This will include the methodology for re-assessing housing need and the process for considering changes to the spatial strategy. This will entail the West of England Planning Housing and Communities Board as well as working with the individual Local Authorities which will need to take account of their intended programme for the review of their core strategies [which was known to start with the SHMA in 2014].”**

47. Thus, the Council was setting out what it was able to do in the circumstances and has done what it set out to do. The Council's letter does not say and cannot be understood to say that the Council would undertake a WoE SHMA during the suspension.

48. It is not accepted that, when read fairly and as a whole, ID28 requires that a WoE SHMA be provided before the Core Strategy could proceed. On the contrary, paras 1.34 - 1.36 are only consistent with the inspector having accepted that that point could not be dealt with at this stage. Paras 1.34 – 1.36 take the problem with provision of a WoE SHMA as a given which could not be overcome at this stage by B&NES.

49. Para 1.34 records the position with the Bristol and North Somerset. Importantly, it confirms that “The Core Strategy for Bristol does not identify any particular requirement for its housing needs to be accommodated beyond the City boundary”. The Inspector was correctly saying that currently there was no cross boundary identification of a wider Bristol HMA need to be met in B&NES. Nor is there any from North Somerset or South Gloucestershire.

50. Para 1.34 goes on to record the fact that the review in Bristol City Council and North Somerset will not happen for five years. In respect of North Somerset, its Core Strategy, was found “sound on the basis of modifications which include a review of the overall housing requirement within 5 year and a potential review of the Green Belt requirements with other West of England authorities.” The inspector was recording the common ground that the comprehensive joint work would happen in 5 years.

51. Taking the absence of a WoE SHMA as a given, the Inspector concluded that:

***“But given the shortcomings in the Council’s methodology there is currently an inadequate basis on which to allow this plan to move forward, particularly given my other main concerns.”***

52. This means, and was understood to mean that, notwithstanding the fact that a WoE SHMA was not and could not be made available, given the other flaws in the Council’s methodology, the plan could not move forward at that time. It necessarily follows that if those methodological flaws could be corrected (and despite the necessary absence of a WoE SHMA) there could be an adequate basis on which to allow this plan to move forward. That stage has now been reached.

**- reflect the reason, in part, that I accepted an unprecedented year-long suspension of the Examination? If not, please explain why.**

53. See response above.

**3.5 Have there been any material changes in circumstances (eg national policy/guidance or evidence) since my conclusions in ID28 (June 2012) regarding the need for a SHMA for the HMA which would justify a reassessment of my previous conclusions?**

- The Geography of Housing Market Areas (CLG, 2010) is now before the examination as well as the B&NES ORS report.
- New CLG SHMA guidance was due to published in July 2013, but is yet to materialise. This may be published before September 17<sup>th</sup>.

- The Ministerial Statement by Local Government Minister Brandon Lewis (1<sup>st</sup> July 2013), partially quoted below is relevant (CD9/H11)

*“As set out in that document and in March 2012’s National Planning Policy Framework, inappropriate development in the green belt should not be approved except in very special circumstances. Having considered recent planning decisions by councils and the Planning Inspectorate, it has become apparent that, in some cases, the green belt is not always being given the sufficient protection that was the explicit policy intent of ministers.*

*The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development in the green belt.*

54. This re-iterates that the presumption in favour of sustainable development in the second part of NPPF (para. 14) does not apply to Green Belt, and that arguments made in solely the context of NPPF (para 49) is unlikely to find favour. This amplifies the necessity of pursuing changes to the Green Belt through plan-making.
55. This Council is proposing five Green Belt Changes for housing purposes. If these changes are not progressed it will delay the delivery of development in sustainable locations. Instead, areas outside the Green Belt (in less sustainable locations) will be targeted (NPPF: paras 40 and 14), as is the current experience within B&NES and elsewhere. These less sustainable locations, are poorly aligned with infrastructure and would be contrary to the spatial strategy and contrary to proper planning and a plan-led approach.

**3.6 What efforts were made by the Council to produce a SHMA that complied with the points in 3.4 above? Please distinguish between any efforts made on the basis of B&NES being entirely within the wider-Bristol HMA and any efforts in the light of the emerging evidence in the new SHMA that the district straddles 2 HMAs.**

56. Please refer to the previous response. There was not a requirement to produce a WoE SHMA to comply with the points in para 3.4 of the Inspector's questions. The Council was at all times aware of the CURDS report and the early ORS work confirmed that the vast majority of B&NES was not part of a greater Bristol HMA.
57. The following information sets out the process adopted by B&NES:
58. First, the completion of a SHMA for the West of England HMA (as previously conceived or on a three authority geography) during the programmed suspension period (let alone the policy response to that SHMA) would have necessitated the full participation of North Somerset, South Gloucestershire, and Bristol. This would require them needing, and being willing, to engage in such an exercise at this time. This relates to both of the scenarios set out in question 3.6.
59. Secondly, the Council's overall approach in responding to the issues of soundness in ID/28 was discussed with adjoining authorities from June to August 2012. A B&NES Cabinet report in September 2012 (CD9/H6) set out the steps proposed by the Council to respond to the ID/28 and highlighted that an early requirement would be a review the current boundary of the strategic housing markets HMA(s) operating across the district (in the light of CURDs), having particular regard to the relationship of settlements in Wiltshire to B&NES and the predominant pull affecting Keynsham in respect of Bath and Bristol.
60. Thirdly, it was confirmed at the start of this process by West of England LA colleagues that it was unlikely that the WoE-led SHMA could be expedited.
61. Fourthly, on embarking on the work required to respond to the soundness issues the Council prepared a SHMA brief. This brief included the need to review the HMA and the brief was shared with adjoining authorities before being finalised (CD9/H9).
62. Fifthly, ORS were formally commissioned in September 2012. Once it became evident from the ORS work that the CURDS gold and silver standard analysis was broadly correct and that there was the basis for a B&NES alone SHMA to be undertaken, B&NES met with adjoining authorities over Sept/Oct/Nov 2012 when the study outputs regarding the HMA were discussed. All adjoining local authorities were consulted on the emerging draft SHMA. Reports to the West of England Planning, Housing & Communities Board in February and July 2013 (CD9/H9 & H10) set



out a programme for the review of the B&NES Core Strategy and confirmed the need for a B&NES HMA.

63. In meantime B&NES has retained a role in WoE led SHMA in light of the need for a further review of HMAs in due course based on Census data.

**3.7 When did it become clear that a SHMA based on HMA(s) was not achievable within the period of suspension? What consideration was then given to withdrawing the plan or seeking an extension of the period of suspension? Should the Council have considered/pursued either option?**

64. ID/28 was received on 21<sup>st</sup> June 2012 and on 17<sup>th</sup> July 2012 the Inspector suspended the examination until at least June 2013. B&NES has done what it said it would do in its response to ID/28. The last section of the B&NES letter cannot be read as stating, and was not intended to state, that it would deliver a WoE HMA. There was no such requirement in ID28 para 1.34 – 1.35; the Inspector recognising the difficulty of such a task.

65. The preceding commentary on plan-making in neighbouring authorities (re 3.6) makes it clear that they were not in a position, from a very early stage of the suspension period, to engage in new SHMA work within that period. It was never anticipated that they would be.

66. The analysis above and summarised below shows that joint SHMA work with Bristol, South Glos. and North Somerset was not necessary for soundness.

67. B&NES was aware of the CURDS work and its relevant conclusions regarding B&NES. Initially, the Council commissioned ORS to review how HMAs operated across B&NES. It became clear that the geographical basis of the former 2009 West of England SHMA did not reflect their analysis or that of CURDS. On October 11<sup>th</sup> 2012, ORS reported its findings to B&NES in respect the geography of housing market areas operating in B&NES.

68. Had, contrary to expectations based on CURDS, the geography of the West of England HMA been found to cover all four authorities (or that it covered most of B&NES by population), officers would have advised the Council that, unless other factors could be relied upon to support a

different approach, the appropriate basis on which to proceed would be with a WoE SHMA. That would inevitably have involved very substantial delay.

69. However, as anticipated, this situation did not arise. When ORS reported its findings in respect the geography of housing market areas it confirmed the broad results of CURDs and provided further evidence that B&NES should not be treated as a part of a best fit wider-Bristol (or WoE) HMA. That work provided further clarity as to the most appropriate approach to be adopted by B&NES regarding a SHMA.

70. In the light of that work, the issue came down to 'best-fit' and finding a sound practicable way forward to address the complex geographical coverage of a Bath HMA that covered 80% of B&NES (by population households) and 25% of Mendip (by population households).

71. In addition to the evidential matters already raised, there are two further issues. These are (1) for the reasons set out already, a wider-Bristol/WoE SHMA covering for the western 20% of B&NES would have not been achievable during the suspension period; and (2) neither ONS nor CLG actually produce official projections data for parts of districts, only whole districts.

72. Therefore the options open to the Council were:

- Despite the ORS/ CURDS evidence, to treat B&NES as part of the WoE HMA and wait until the WoE SHMA was complete. That was not a best fit approach (20% vs 80%), was not justified by the evidence, and would be inconsistent with CURDS and ORS results. The WoE SHMA was some way off and itself would not actually be able to produce a specific output for this geography any more than can be achieved via the approach set out in 3.2. That approach was in any event inappropriate given the implications for the B&NES area of further delay
- Based on the fact that 80% of District falls within the Bath HMA and TTWA use the district boundary as proxy for the Bath HMA; or
- Combine with Mendip to produce a SHMA covering both authorities because part of each authority fell partly within the Bath HMA /TTWA.

**3.8 I understand that the West of England LEP, Planning and Communities Board have agreed to commission a new joint West of England SHMA Review during 2013/2014. What is the latest position/timetable for production?**

73. A report to the Planning, Housing & Communities Board on 1/7/13 regarding the pre-production brief for a WoE SHMA sets out an indicative timetable (CD9/H10). This is as summarised as follows;

<b>February 2013 PH&amp;CB</b>	Members to consider and endorse pre-production brief for consultation.
<b>March 2013</b>	Publish Pre-production brief for consultation
<b>May-June 2013</b>	Consider outcomes of pre-production brief consultation, and any revisions to the briefs that may be required as a result.
<b>September 2013</b>	Finalise the Brief and identify commissioning arrangements.
<b>October 2013</b>	Commission consultants in principle (and subject to the outcome of the HMA Area boundary), for workstreams as required
<b>November 2013</b> <i>(Now April 2014)</i>	Census Travel to Work Area Data available- inform definition of Housing Market Area (HMA).
<b>May 2014</b>	On basis of all data available (Census) & confirmation of HMA, workstreams commence.
<b>Dec 2014</b>	First output (likely interim findings)

74. The scope and brief for the production of a new West of England led SHMA is currently being prepared. The Housing Market Area is yet to be agreed but it will be informed by the latest Census Travel to Work Area information when it is released early in 2014 and the CURDS work. It is likely to include Bristol, North Somerset, and South Gloucestershire. Depending on the latest census it may include B&NES and also potentially Mendip although on current information this is thought to be unlikely - the key point is that on current census date not one of the 14 possible versions of a comprehensive set of HMAs in CURDS, does B&NES feature with Bristol and its M4/M5 neighbours (CURDS and CLG 2010). From a best fit perspective, B&NES is always bundled with the former districts of West Wiltshire and Kennet and Mendip, or just Mendip (**Annex 4 – CLG best fit map**).

75. The timetable for production has yet to be finally confirmed but the current draft timetable envisages final outputs by the end of 2014/beginning of 2015. The programme for the determination of the policy options formulation, refinement and examination is currently being considered but it will need to take account of Bristol's need for a review of its Core Strategy in around 2016.

### **What is the intended use of such a SHMA for development planning in B&NES?**

76. The first stage in the WoE SHMA is to assess the appropriate HMA. If, contrary to current expectations, the evidence shows that B&NES should be treated as part of a greater Bristol HMA, then the B&NES Core Strategy will need to be reviewed in light of the updated WoE SHMA evidence and the policy responses agreed to that evidence base.
77. If, as a result of that work, B&NES is not within the wider Bristol HMA, it would have an on-going participative/observational role in the preparation of the SHMA in light of the potential implications for B&NES of the outputs of the Wider Bristol SHMA and the need for its involvement in the policy response as part of a co-ordinated review of Plans in the West of England.
78. It is particularly important that B&NES plays a participative role in any supporting work that is covered West of England/ LEP area as a whole i.e. the commissioning of an updated suite of economic projections. Indeed, this Council has already offered comments on a brief for such projections in the context of the LEP Strategic Growth Plan.
79. The creation of a Unitary Wiltshire and its plan making activities complicates matters as West Wiltshire is conceptualised as forming one of three sub HMAs within Wiltshire HMA.

### **Would the geographic scope of such a SHMA sufficiently relate to the HMA to comply with NPPF?**

80. The correct geographic scope of the SHMA for the Bath HMA has been considered extensively above. We consider that the B&NES SHMA on current evidence sufficiently relates to the Bath HMA to comply with the NPPF. We do not consider that on current evidence a WoE SHMA would sufficiently relate to the Bath HMA to comply with the NPPF.
81. It is possible that the WoE work in future will decide that a West of England LEP area SHMA (including B&NES) is appropriate if justified by evidence available at that time.
82. Alternatively, the geographic scope of a West of England SHMA , focused on Bristol and delineated to fit the administrative boundaries of North Somerset and South Gloucestershire would, on current evidence, also be justified in respect of 'best-fit' by its core focus and on the

authorities around M4/M5 corridors. The Geography of Housing Market Areas (CLG, 2010) currently suggests this as the best-fit for the wider Bristol HMA. B&NES would therefore form a SHMA area of itself (or in partnership with Mendip if that was Mendip's wish and the evidence pointed to that as being appropriate).

83. The approach that B&NES Council has taken is therefore considered to be sound.

### **3.9 Does the Council's participation in producing a joint SHMA indicate that CD9/H4 is inadequate?**

84. The Council does not consider this to be the case, as outlined in the responses so far.

85. B&NES is participating in the joint SHMA because this work will entail a review the former WoE HMA in light of TTWA new evidence, forthcoming in 2014. The pre-production brief prepared for the WoE SHMA recognises that the boundary as currently conceived needs to be reviewed as an early task. In addition B&NES has committed itself to reviewing its Core Strategy alongside the other WoE authorities in the event that the wider Bristol/WoE SHMA reveals an unmet need to be accommodated in adjoining authorities. B&NES accepts the functional links with its neighbouring City of Bristol and so the joint SHMA is highly relevant to B&NES. Therefore it is necessary for B&NES to participate in the joint SHMA.

### **3.10 Does the focus of CD9/H4 on B&NES only and the intended production of a joint West of England SHMA have practical implications for the subsequent proper assessment in this Examination of:**

- (i) the locational strategy for major housing development across the district, particularly the merits of a Bath focus and/or development on the edge of Bristol**
- (ii) the establishment of Green Belt boundaries that will endure beyond the plan period (bearing in mind that the Council is proposing in principle to remove land from the Green Belt to be put into effect in the Place-making Plan once the Core Strategy is adopted)?**

***(NB This question is not concerned with whether the locational strategy is justified or whether specific locations should be removed from the Green Belt,***

***but solely whether any inadequacy in the scope of the SHMA would undermine the subsequent assessment of those matters if the Examination were to continue.)***

86. The Council has set out earlier in this response why it considers that there is a strong case to proceed with a plan that is based on the evidence of a housing requirement relating to the Bath HMA and the District and not a wider Bristol HMA at this stage. On this basis, the apportionment of housing development within B&NES has been properly assessed by the Council through the Sustainability Appraisal, the application of the principles from the NPPF and also in the light of the evidence in ORS Study. The locational strategy for major housing development across the district is explained in Annex 1 to the March B&NES Council report.
87. The focus on Bath, as a key economic driver and sustainable location, is justified by the evidence and this would be the appropriate approach under a spatial strategy for both B&NES alone and for the sub-region (as evidenced in the now revoked RSS). A proportion of housing being provided to the west part of the district accords with the conclusions in the ORS study.
88. It is acknowledged that preparation of a sub-regional spatial strategy is a different exercise to that for one district alone. However, the former is not needed now for the reasons already set out above. In addition, whilst the functional link with Bristol is recognised, there is no identified unmet need from Bristol (or any other area) at this time, which is to be met in B&NES. Bristol has continued to re-iterate this position since the adoption of its Plan. Moreover, Bristol has an identified contingency in the event that additional housing is required. It is not within the gift of B&NES to unilaterally decide now the size of sub-regional housing requirement, how it is to be apportioned across the sub-region, determine the capacity of Bristol to accommodate housing, assess whether Bristol has any unmet need and decide what proportion should be accommodated in B&NES.
89. Agreement across the WoE for a forthcoming review of plans will enable consideration of the sub-regional housing requirement and distribution at right time. Bristol plans to review its Core Strategy about five years after adoption and the other West of England Authorities, including B&NES, have recognised the importance of participating in this process. It is accepted that this entails an early review for the B&NES Local Plan soon after its adoption, but the NPPF (para 153) advises that Plans should be reviewed in whole or in part to respond flexibly to changing circumstances. The reason for the early review of the B&NES Core Strategy would not be

because the spatial strategy as currently proposed is inadequate but because further work across the region showed that there was housing need from Bristol which needed to be accommodated in B&NES and which B&NES should plan for under the duty to co-operate.

90. It is accepted that releasing land from the Green Belt now for development does have practical implications in terms of setting long term Green Belt boundary in locations adjoining Bristol, such as on the edge of Bristol. NPPF para 83 states that when altering Green Belt boundaries through reviews of Local Plans authorities should have *"regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."* Green Belt boundaries set through the B&NES Core Strategy may need to be reviewed again as part of the forthcoming review of Plans in the WoE. Whilst it is not ideal, it is an inevitable consequence of the duty to co-operate. This situation is inevitable where there are two HMAs in close proximity where there are functional links. B&NES is taking a constructive approach consistent with the "duty to co-operate" by committing to review its Core Strategy in conjunction with Bristol in a co-ordinated way and at the right time.
91. Furthermore, it is not inevitable that land in B&NES on the edge of Bristol is the most appropriate location to meet the housing needs of the sub-region in the longer term. This will need to be determined in light of the evidence now, sustainability assessments and the sub-regional spatial strategy agreed between the authorities. This is more suitably achieved through a co-ordinated review as is programmed.
92. The Council could have decided not to allocate land on the edge of Bristol at this stage and waited until the Core Strategy was reviewed alongside Bristol's Plan. However this would have meant either (1) locating this new housing in a less sustainable location than that identified through the Sustainability Appraisal, potentially prejudicing the soundness of the plan or (2) a delay in identifying land that is suitable and necessary for housing now on the possibility that there may be a need in the future for a greater level of development. Such a need may never materialize meaning the delay was unnecessary.
93. The Council does have the option to withdraw this plan and wait for the WoE-led SHMA to clarify HMAs to inform the next steps. The options could be: (1) If the WoE SHMA confirmed the existence of both a wider-Bristol and a Bath HMA, then it could embark on the preparation of a new Local Plan for B&NES but would have wasted crucial years with no tangible benefit; or (2) If the WoE SHMA evidences leads to the conclusion that B&NES is part of the wider-Bristol HMA,

then a comprehensive approach can be taken to the preparation/review of plans across the WoE based on the new evidence. However, this would entail a delay to bringing forward sites which are needed now. The benefit of the Council's current approach is that it enables delivery of housing supply in the short term as well as consideration of a wider sub-region housing approach in the medium term. Withdrawal of the Plan now would inhibit housing delivery and the implications are set out more fully in response to question 3.12.

*NB In the interests of clarity, progress on the Placemaking Plan does not need to wait until the Core Strategy is adopted. It is being progressed in parallel with the Core Strategy in order to expedite the delivery of housing. However, work on the Placemaking Plan will not advance to an extent that it pre-empts the outcome of the Core Strategy examination.*

**3.11 It is not my intention to assess in this hearing whether the Council's numerical assessment of the housing requirement is justified (that involves extensive further work and would be the subject of a separate hearing if the Examination continues). In BNES 41, the Council cites in support of its SHMA for B&NES only, what it believes is significant over-provision of market housing (including a significant proportion well-related to Bristol) which it considers would be a significant contribution to future Bristol HMA need. If the Council's numerical assessment were subsequently to be found justified, would any such over-provision of market housing offset any shortcomings or non-compliance with the NPPF of the B&NES only SHMA? (I appreciate that the SHMA's numerical assessment is strongly disputed by many parties and would need to be thoroughly explored in due course.)**

94. The Council has set out above its position above as to why it considers that its approach is compliant with the NPPF. Annex 1 to the March B&NES Council report explains that the additional supply enables a degree of flexibility for meeting B&NES' requirements for market housing as well as enabling a boost to the provision of affordable housing. The housing provision in the B&NES Core Strategy seeks to meet the needs of the District and is not intended to meet any wider needs generated from other parts of the HMA outside B&NES. The over-provision in market housing provides significant flexibility for the B&NES housing land supply as is required by the NPPF. However, because this housing is in addition to the identified need for market housing in B&NES, and because around a third of the 12,700 houses are proposed to be located in the Bristol HMA part of B&NES, then some of this additional housing may benefit the wider Bristol HMA.



95. Some understanding is needed in respect of the amount of housing that might technically be required in B&NES to the west of the A39 Highway versus what is being provided. There are migration-led and employment-led angles to this.
96. From a migration-led perspective the following is a useful guide: Of the 73,515 households in 2011, 60,157 were in the Bath HMA – 82%. Of the growth in households 2001-2011 of 2400 (80%) occurred in the Bath HMA. So, in respect on any migration-led projection it would not be unreasonable to expect that about 20% of the growth be generated in that part of B&NES that is technically beyond the gold standard B&NES HMA. Similar proportions exist with the jobs based scenario (Fig 55 of the SHMA).
97. Whilst the location of new housing has been informed by the sustainability appraisal, the amount of new housing in the B&NES part of the gold standard wider Bristol HMA reflects the above and is broadly in line with this evidence.

**3.12 If I were to conclude that the B&NES only approach of the new SHMA (CD9/H4) is an inadequate and unjustified response to the unsoundness identified in ID28, what are the consequences for the Examination? What should I do? (*Several representations invite me to come to conclusions about the housing requirement in the wider Bristol HMA based on evidence they provide. Notwithstanding the scale and complexity of such a task, it would not produce a compliant SHMA for the HMA since it would not have been produced in cooperation with neighbouring authorities.*)**

98. The Council has set out above why it considers that the SHMA provides a NPPF compliant evidence base for a sound Core Strategy. However, if the Inspector continued to have concerns about robustness of the B&NES SHMA, the Council would, urge the adoption of a pragmatic approach and continue with the examination.
99. Assessing the housing needs in the HMA is not an end in itself but a means to an end i.e. to boost the supply of housing (NPPF para 159). The Council considers that the Core Strategy achieves this objective. The benefits of continuing with the Core Strategy, and the harm from withdrawing it, far outweigh any additional benefits of restarting the whole process.
100. Withdrawal of this Plan will significantly inhibit bringing forward housing supply in the medium term. It will take around 3 years to produce a new style local Plan. There would therefore be a delay in bringing forward the large greenfield housing locations because releases of land

from the Green Belt for development can only be expected to come forward through the plan making process and not through planning applications as stated in the recent ministerial statement (CD9/H11). Govt objectives for a boost to new housing will therefore be frustrated.

101. Withdrawal of the Plan will also result in a policy vacuum with the removal of the useful, up-to-date policies with which, the Inspector has not raised issues of soundness. The policy vacuum will leave the district open to predatory planning applications with pressure for development beyond the Green Belt in peripheral and less sustainable locations in the rural parts of the district and the Somer Valley directly contrary to the spatial strategy.

102. Without a plan, it will also be more difficult to ensure new growth is well aligned with the necessary infrastructure and there will be a high degree of uncertainty for both local communities and the development industry, contrary to the objectives of a plan led system. This is likely to lead to costly appeals for a period of years, undermine investment decisions, and provide an obstacle to economic growth objectives in the LEP.

103. It should also be noted that whereas the NPPF is guidance, the need for an adopted plan has a statutory basis. The benefits of progressing with the plan are significant in that it ensures Plan-led system, facilitates-growth and boosts housing land supply. Moreover, progressing the plan now does not prevent a consideration of a wider Bristol HMA needs in a timely way.

104. It is useful to draw on the experience of other authorities:

105. The Milton Keynes Core Strategy was adopted in July 2013. The Inspector has considered levels and locations of growth in the district and sub-regional context in the absence of an up-to-date SHMA. She states that 'the Plan has a limited time horizon and there is a large measure of agreement that its adoption would be in the public interest. But an early review is needed for greater clarity about the role that Milton Keynes and its hinterland will play in the longer term. This will complement initiatives to help deliver growth locally and ensure that the potential for significant uplift in housing and other requirements will be planned in the most sustainable way.'

106. The similar issues were raised at the examination of the West Berkshire Core Strategy the details of which the Inspector will be familiar. The West Berkshire Core Strategy was adopted in July 2012. The Inspector has considered cross border housing issues including the absence of a joint SHMA within the HMA. He has considered what process would best achieve the aims of the

NPPF, notwithstanding the identified shortcoming in relation to a fully compliant assessment of housing needs and demands. Then he concluded that 'on balance, I consider that the Government's planning aims, as set out in the NPPF, are best achieved in the short term in West Berkshire by the adoption of this Core Strategy (subject to the main modifications necessary for soundness), but amended to make clear that the 10,500 housing figure is a minimum and not a ceiling and requiring a review of housing provision.'

107. Lastly, it is not possible to conclude that there is an unmet wider Bristol housing need on the evidence available. Even if it was accepted that there is any unmet need from Bristol, then this would trigger Bristol's contingency and that Local Authority has a sound process in place to consider release of this land through a plan review. It cannot be the role of B&NES Local plan to unilaterally override Bristol's sound Core Strategy. Furthermore SHMA is only an evidence base to inform policy formulation – it does not provide the policy response or revised spatial strategy. There is a necessary process to go through to derive a policy response via a joint review of Core Strategies in WoE. The housing requirement for a wider Bristol HMA and its spatial distribution cannot be unilaterally decided through the B&NES Core Strategy examination. This needs to be done as part of co-ordinated review of the WoE Local Authority Plans.

108. There is therefore very little to be gained from withdrawing the Plan.

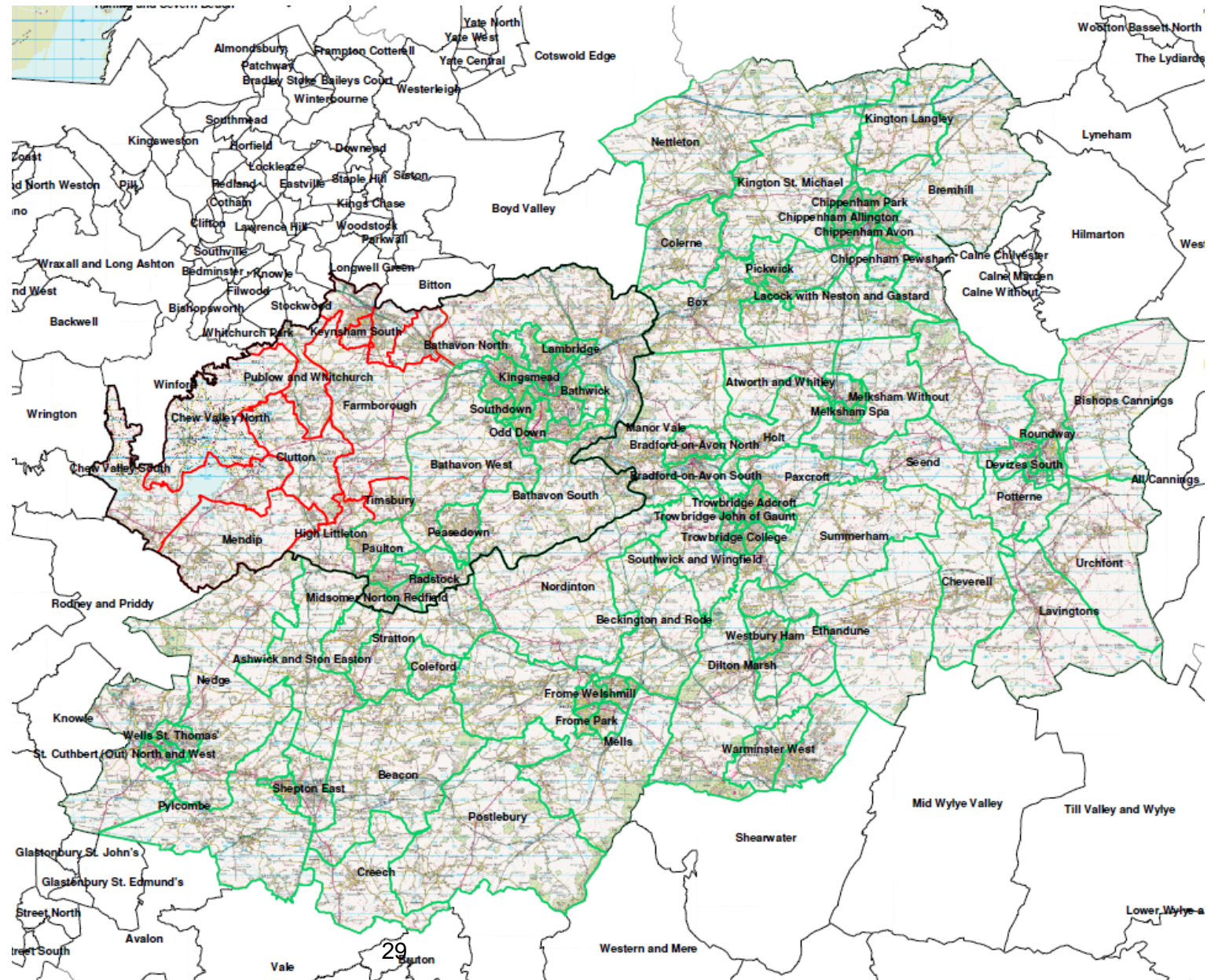
**3.13 I have not posed any questions about the nature of the Bristol Core Strategy - one of the brief reasons given by the Council to justify a SHMA for B&NES only (Annex 1 of the report to Council, 4 March 2013 - paragraph 3.5). I responded to this point briefly in ID32 (paragraph 11). The nature of the Bristol Core Strategy was a matter previously discussed and is unchanged since my conclusions in June 2012.**

80 The Council's understanding is that the Bristol Core Strategy does not identify any unmet need and it has a contingency in the event that need is greater than currently being planned for. The strategy is subject to a 5 year review following adoption to enable a response to updated information or changing circumstances. This position was found sound at examination.

## LIST OF CORE DOCUMENTS REFERRED TO IN BNES/45

<b>CD4/H11)</b>	<a href="#">WoE Strategic Housing Market Assessment 2009</a>
<b>CD9/H4</b>	<a href="#">Strategic Housing Market Assessment (SHMA) Update 2013 - Report of Findings (2.4 MB)</a> , Opinion Research Services (February 2013)
<b>CD9/H4/1</b>	<a href="#">Strategic Housing Market Assessment (SHMA) Update 2013: Addendum 1a: Future Projections</a> (July 2013)
<b>CD4/H11</b>	<a href="#">West of England Strategic Housing Market Assessment (SHMA)</a> , West of England Partnership/ Professor Glen Bramley (June 2009)
<b>CD9/H6</b>	Cabinet Report <a href="#">Bath &amp; North East Somerset Core Strategy: Inspector's preliminary conclusions and review of the Local Development Scheme and Appendices</a> , September 2012
<b>CD9/H7</b>	<a href="#">Identifying Sub-Regional Housing Markets: Advice Note</a> , Department for Communities and Local Government (March 2007)
<b>CD9/H8</b>	<a href="#">Geography of Housing Market Areas in England Summary Report</a> , Colin Jones, Mike Coombes and Cecilia Wong (July 2010)
<b>CD9/H9</b>	<a href="#">West of England Strategic Housing Market Assessment Review</a> , Report to West of England Planning, Housing & Communities Board (February 2013)
<b>CD9/H10</b>	<a href="#">West of England Strategic Housing Market Assessment Review</a> , Report to the West of England Planning, Housing & Communities Board (1st July 2013)
<b>CD9/H11</b>	<a href="#">Ministerial Statement by Local Government Minister Brandon Lewis</a> (Department for Communities and Local Government) 1 <sup>st</sup> July 2013 (weblink)

**Annex 1**  
**The Geography of Housing Markets**  
**in England (CURDS, CLG 2010)**  
**Gold Standard 'Bath' HMA**  
**Enhanced resolution version of**  
**Figs 1 and 2 of Draft SHMA**



**Annex 2**  
**ONS Travel to Work Areas**

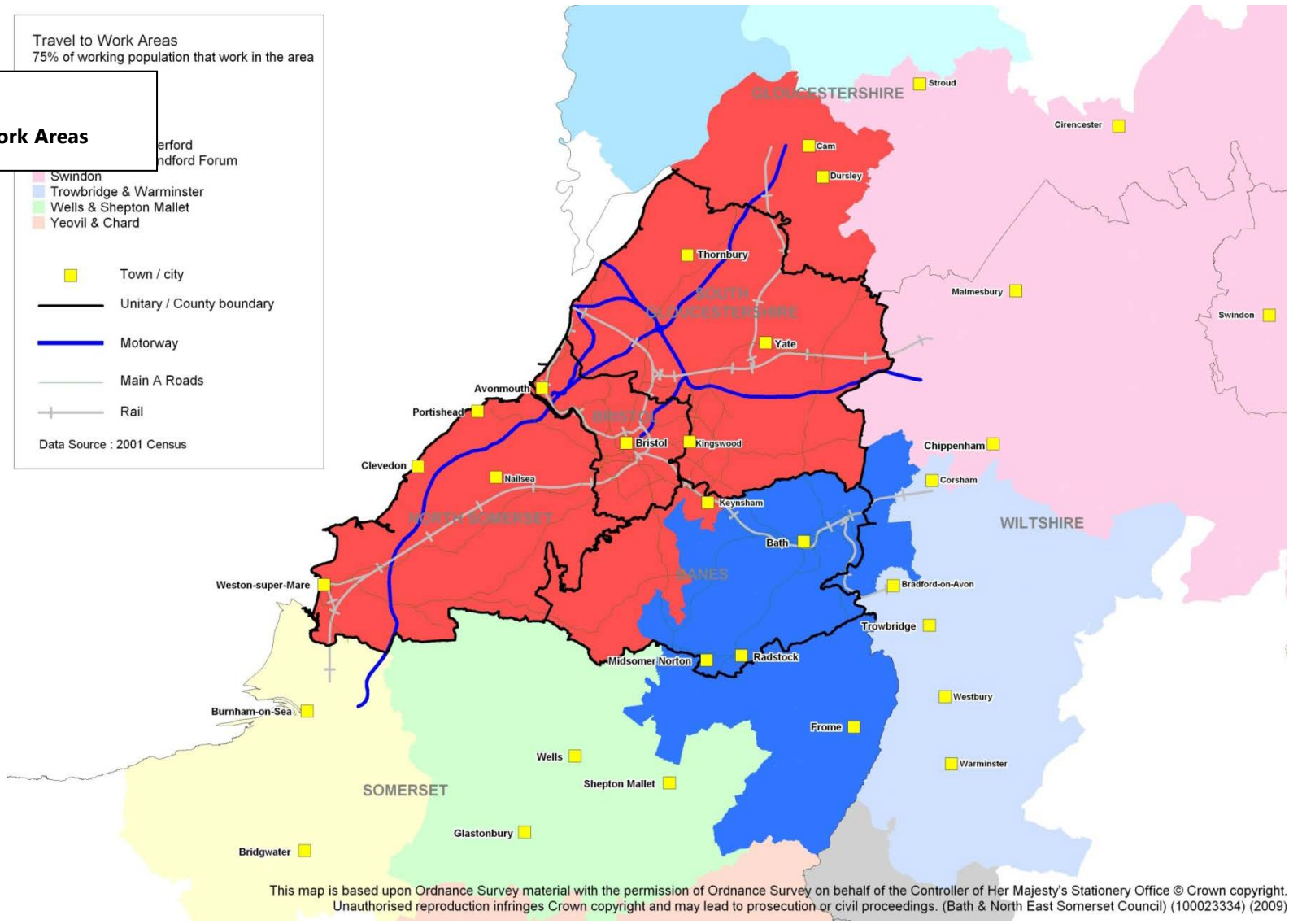
Travel to Work Areas  
75% of working population that work in the area

erford  
ndford Forum

- Swindon
- Trowbridge & Warminster
- Wells & Shepton Mallet
- Yeovil & Chard

- Town / city
- Unitary / County boundary
- Motorway
- Main A Roads
- Rail

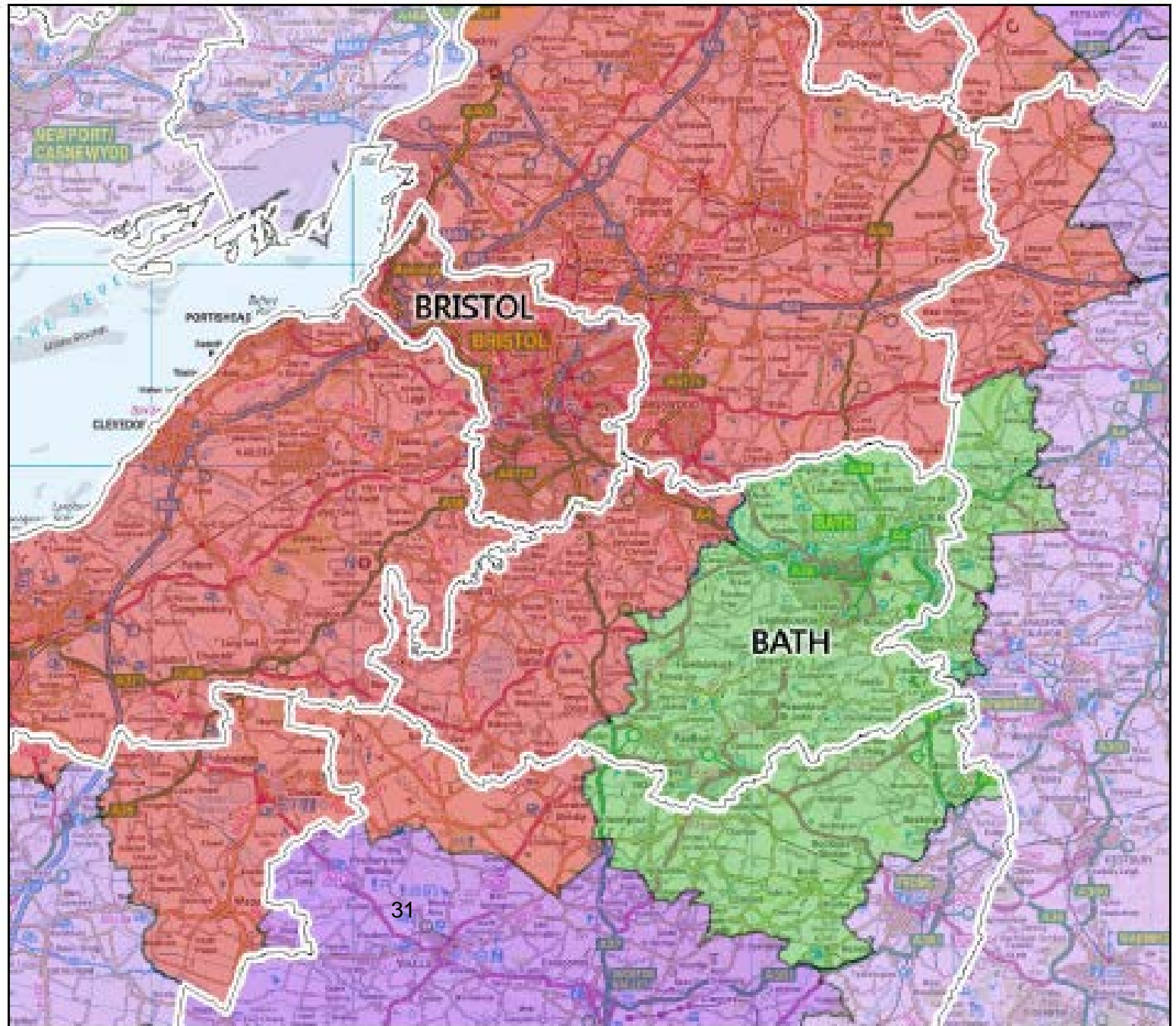
Data Source : 2001 Census



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**Annex 3**

**SHMA Bath HMA**



**Annex 4**

**CURDS/CLG Silver Standard HMAs**

– best fit to LA boundaries

