

## **Bath & North East Somerset Council's response to ID/27**

### **Introduction**

1. This statement sets out Bath & North East Somerset (B&NES) Council's response to the Inspector's request for comments on whether the NPPF or Policy for Travellers Sites materially change national policy compared with the policy they replace in so far as is relevant to the soundness of the Core Strategy. The statement is split into two sections – the first section briefly outlines the Council's assessment of the Core Strategy and the implications for soundness of government policy set out in the NPPF and Policy for Travellers Sites, and the second section outlines the Council's response to the Inspector's specific questions relating to housing requirement and 5 year land supply.

### **Implications for soundness of the Core Strategy of the NPPF and Policy for Travellers Sites**

2. In September 2011 the Council undertook an assessment of the implications of the draft NPPF for the soundness of the Core Strategy. The Council agreed and published for consultation a schedule of potential changes that would need to be made to the Core Strategy if the final approved NPPF policy was the same as that set out in the draft (see CD5/23). The Council considers that these potential changes need to be taken forward as the approved NPPF is consistent with the draft in these respects, with the exception of the potential change to policy B3 (ref. NPPF2 in CD5/23 'Schedule of Potential Changes arising from the Draft NPPF') and a minor change to the wording of the potential change to the Delivery section relating to policy CP12 (ref. to NPP4) – see paragraphs 5 and 14 below.
3. The Council considers that the publication and adoption of the NPPF and Policy for Travellers Sites as national policy does not affect the soundness of the Core Strategy as submitted and proposed to be changed. A brief summary of the assessment undertaken by the Council by Core Strategy chapter is set out below. Whilst no points of soundness arise some minor issues are highlighted along with a potential

solution. This is set out for information purposes and consideration by the Inspector as necessary.

#### Vision & District-wide Strategy

4. This section of the submitted Core Strategy (including Policy DW1) is considered to generally conform with the NPPF. In the schedule of potential changes arising from the draft NPPF (CD5/23) the suggested change to policy DW1 (change reference NPPF1) would ensure that the policy complies with the presumption in favour of sustainable development set out in the NPPF. In line with the NPPF Policy DW1 also plans for significant levels of housing and economic growth and (in conjunction with the Placemaking Plan) it also accords with the premise that development and growth should be plan led. Issues around housing requirement and land supply are addressed below.

#### Bath

5. The Council considers that the Bath section of the Core Strategy is in conformity with the NPPF and no soundness issues arise. Policies B1, B2 and B3 set out the spatial strategy for the city as a whole and specific areas within it. The policies seek to ensure significant levels of housing and economic growth are delivered within the city whilst protecting and conserving the City's built and natural assets. The policies also adopt a sequential approach to town centre uses. This approach conforms with the NPPF (including paragraphs 7 – 9 on 'Achieving sustainable development' and 23 and 24 on 'Ensuring the vitality of town centres'). In September 2011 the Council published a schedule of potential changes to the draft Core Strategy arising from the draft NPPF (CD5/23). The change (ref. NPPF2) to Policy B3 has now been superseded by a change proposed during the Examination hearings – see change ref 21 in the 'Schedule of Rolling Changes to the Draft Core Strategy for consideration by the Inspector' (CD6/E2.2). This latest change which outlines the policy approach of seeking to retain existing industrial uses in Newbridge Riverside and prioritising Twerton Riverside for a range of economic-led development conforms with the NPPF approach set out under 'Building a strong, competitive economy'.
6. Policy B4 seeks to prevent development that would result in harm to the OUV of the World Heritage Site and its setting but does allow for the consideration of a development that has demonstrable public interest. This is consistent with the

approach advocated in the NPPF in respect of designated heritage assets of the highest significance as outlined in paragraphs 132 – 134.

#### Keynsham and Somer Valley

7. The Council considers that both the Keynsham and Somer Valley sections of the Core Strategy and policies contained therein are in conformity with the NPPF. The policies in these sections set out the spatial strategy for the areas concerned and specifically Keynsham, Midsomer Norton and Radstock town centres. In doing this they seek to deliver housing and economic related development whilst maintaining the character of the towns and improving self-containment and economic resilience/independence. The approach set out in these policies accords with that set out in the NPPF (including paragraphs 7 to 9).

#### Rural Areas

8. The Council considers that the policy approach for the rural areas set out in the Core Strategy conforms with the NPPF. Policies RA1 and RA2 support the NPPF principle to promote sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities setting out circumstances in which development will be acceptable. Policy RA3 allows proposals for the development of community facilities/shops within and adjoining all villages, provided that they are in keeping with the character of the village and meet local needs. This will help achieve NPPF (paragraph 28) aim of supporting thriving rural communities, more specifically by promoting the development of local services and community facilities in villages. Policy RA4 allows the release of land that would not normally be used for housing for development of 100% affordable housing, on small sites and where there is a demonstrated local need and sets out the criteria to be met. This policy is consistent with the approach set out in the NPPF (paragraph 54) by acknowledging the need to plan for rural exceptions sites for affordable housing where appropriate to reflect local housing needs.

#### Core Policies

9. With regard to the Core Policies set out in the Core Strategy the Council considers that they conform with the NPPF and no issues of soundness arise. The policy set out in the NPPF has not materially changed the national policy it replaces for many of

the issues addressed by the core policies. Other core policy issues have been debated at the Examination hearings. Therefore, analysis of each and every core policy and the Council's position on conformity with the NPPF is not set out here. However, assessment of aspects of three core policy areas is set out below where national policy has materially changed.

10. Policy CP8, Green Belt is considered to be wholly consistent with the NPPF by maintaining the general extent of the Green Belt in B&NES and ensuring its openness is protected from inappropriate development. Paragraph 6.64a (in the 'Schedule of Rolling Changes to the Draft Core Strategy for consideration by the Inspector' (CD6/E2.2) change reference 47) refers to Major Existing Developed Sites (MEDS) in the Green Belt being identified and defined in the B&NES Local Plan and that the designated MEDS and their boundaries will be reviewed through the Placemaking Plan. However, the NPPF now refers to previously developed sites rather than MEDS. It is therefore, suggested that paragraph 6.64a be amended to state that the Council will be reviewing the 'approach towards MEDS' in the Placemaking Plan.
11. In relation to Policy CP11 (Gypsies, Travellers & Travelling Showpeople) national policy contained in Planning for Traveller Sites is largely unchanged from that set out in Circulars 01/2006 and 04/2007. The main change set out in the new document is the requirement in 'Policy B' to identify and update annually a five year land supply of sites, as against locally set targets. That policy also includes the requirement to identify sites or broad locations for growth for years six to ten and, *where possible*, years 11-15.
12. Core Strategy Policy CP11 is not considered to require any amendment to reflect the policy position set out in 'Planning for Traveller Sites' requiring Local Plans to identify a five, ten and, *where possible*, 15 year supply of sites. This is due to the stated commitment to produce a separate Site Allocations DPD on Gypsy and Traveller sites which will be required to be in conformity with national policy and be subject to separate Examination. In addition Core Strategy Policy CP11 and the supporting text in paragraph 6.82b (as proposed to be changed in September 2011) clearly state that sites will be identified to meet future accommodation needs beyond 2011 once assessed. The production of the Gypsy & Travellers DPD, which will allocate sites, is already underway with a Preferred Options consultation document scheduled for publication in May 2012. The Gypsy & Travellers DPD will identify land to meet a five

year supply of sites (for the period 2006-2011) and future accommodation needs (as assessed for 2011-2016). The Core Strategy is therefore consistent with national planning policy as it sets out a strategy for meeting identified accommodation needs as well as future needs.

13. There are no further material changes to the national planning policy contained in Planning for Traveller Sites relevant to the soundness of the Core Strategy.
  
14. In the Schedule of Potential Changes arising from the Draft NPPF (CD5/23) the Council suggested a potential change to the delivery section related to policy CP12 (see change ref. NPPF4). This change sought to update the reference to PPS4 in the draft Core Strategy with a reference to retail and leisure uses being subject to the sequential and impact tests set out in the NPPF. The final version of the NPPF makes it clear (in paragraph 24) that the sequential test applies to main town centre uses (and not only retail and leisure uses). The reference in the delivery section related to policy CP12 would need to be amended accordingly.

## Housing Requirement and Land Supply Issues

### Does the NPPF significantly change national policy in relation to the approach to assessing the housing requirement in a Local Plan?

15. Paragraph 33 of PPS3 is replaced by Paragraph 159 of the NPPF.
16. Paragraph 33 of PPS3 required LPAs to take Government's latest household projections into account when determining the technical housing requirement. It does not refer to population projections or the requirement to take into account migration and demographic change.
17. Paragraph 159 of the NPPF does not contain a specific reference to 'Government's latest household projections and refers instead to the need to prepare a SHMA<sup>1</sup> to identify the housing that is needed to 'meet household and population projections, taking account of migration and demographic change'.
18. There are three notable changes here. The first relates to the absence of the reference to 'Government's latest', the second is the introduction of population projections as a specific consideration and the third is the addition of a qualifying statement in relation to migration and demographic change.
19. It is accepted that the omission of the words 'Government's latest' is probably not of substantial significance because the Government's household projections are really the only such projections available. Further, given that projections are based on 5 year historic trends and that these are, broadly speaking, matters of statistical fact<sup>2</sup> all projections based on the same ONS trend data will produce the same result. A projection is not however purporting to be a reliable 'forecast' of future change. This is because there is, deliberately, no wider contextualisation or analysis within a projection.
20. Paragraph 159 of the NPPF gives new recognition and equal weight to population projections as to household projections. These are a fundamental component of household projections and are published 12 months in advance of a comparable set of household projections. Any changes to the population projections will therefore

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<sup>1</sup> Perhaps jointly with neighbouring authorities

<sup>2</sup> until data is reviewed or rebased (e.g. following a census)

feed directly through into the next set of household projections. This is important because the most recent population projections (published in March 2012) show how seriously inflated the previous set of household projections were, confirming the Council's scepticism about them and demonstrate how inappropriate it is for the objectors to base their case on them.

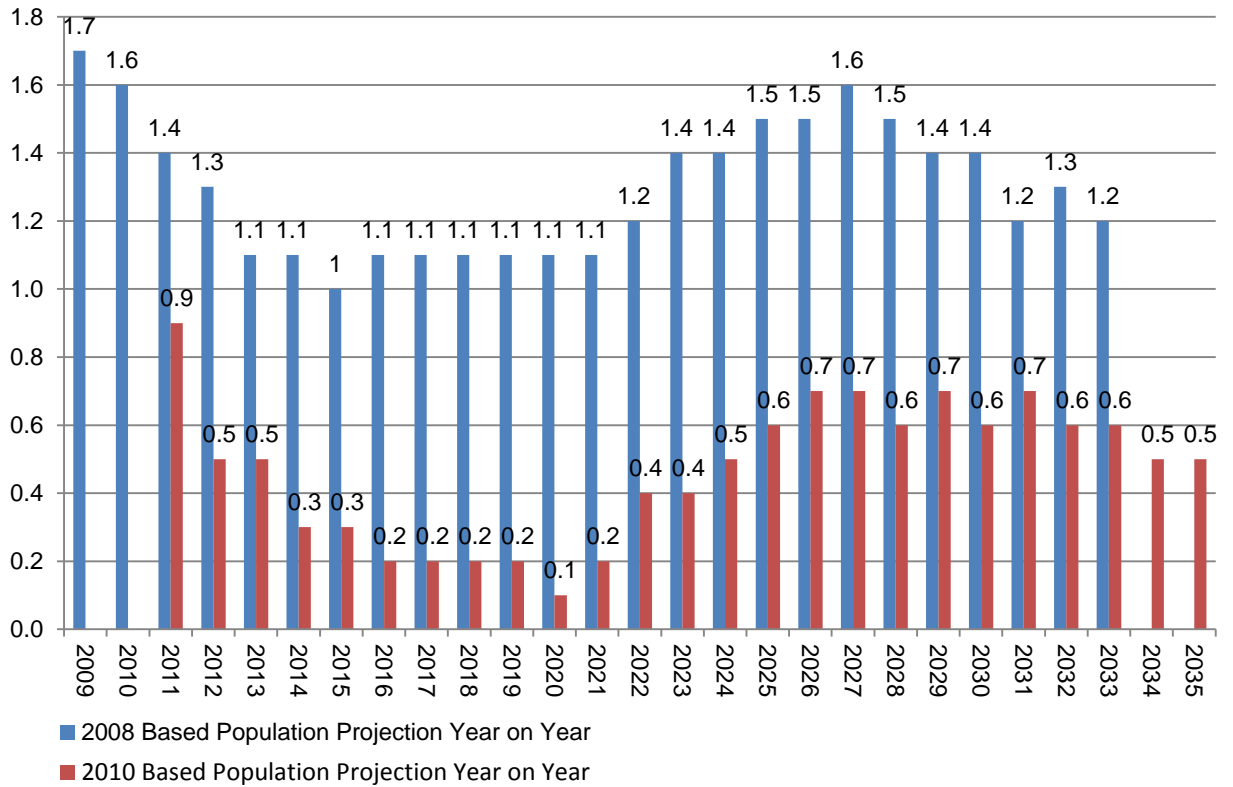
21. On 21<sup>st</sup> March 2012 ONS published new subnational population projections. For BANES these contrast very significantly with the previous projections published in 2010. The projections are massively reduced and will very materially affect the next set of household projections<sup>3</sup>.

22. Against a 2006 baseline of 173,100 the latest projections indicate that the BANES population will reach 183,000 by 2026. The previous projections were for a population of 200,000 at this date - a difference of 17,000 people. We are now looking at an official projection of growth in population of about 10,000 over the Core Strategy period, not 27,000 (less than 40% of the earlier figure). The reason for the reduction is very much related to much reduced net international migration estimates for BANES – as per the Council's evidence present as examination. Additional graphs in annex 1 illustrate this point.

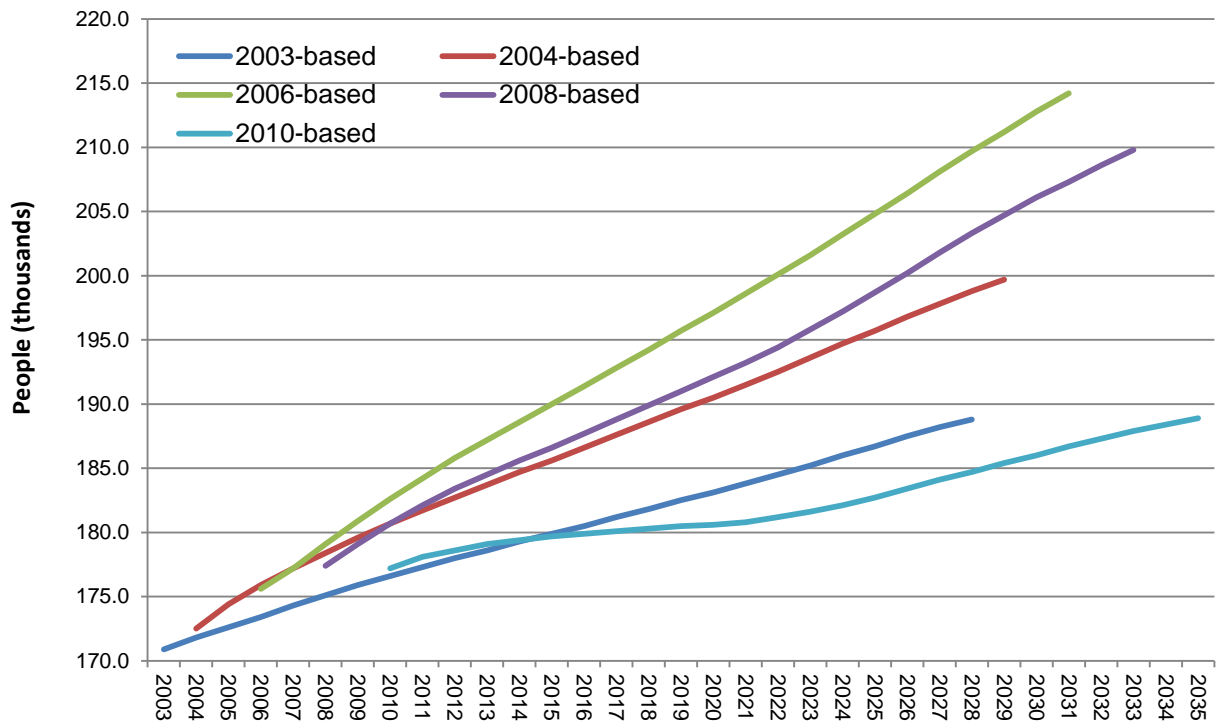
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<sup>3</sup> The data for both sets of projections is presented in Annex 1 and forms the basis of the graph presented on this page.

### Comparison of year on year change between 2008 based and 2010 based population projections for BANES



### Comparison of ONS subnational population projections for B&NES





23. This story is similar for Bristol where against the 2006 baseline of 413,600, the 2026 population is now projected to be 477,000 rather than 548,000. The projection is now for an additional 63,400 people rather than 134,400 (47% of the earlier figure).

24. The impact of these figures on the headline household projection for BANES will not be known during the likely CS examination period. However, based on some of the common assumptions already used in the Council's evidence base (Stage 2 Report) a broad indication of a possible outcome might be as follows.

	2006	2026	Change
Total Population	173,100	183,000	10,100
Private H'hold Population	168,100	177,000	10,100
Average Private H'hold size	2.33	2.15	
Households	72,000	82,970	c.11,000
Homes	74,000	85,225	11,225

25. It is considered that the change in policy introduced by the NPPF re the reference to population projections and by requiring consideration of migration and demographic change strongly supports the Council's approach during the CS process.

26. The introduction of the words "taking account of migration and demographic change" is highly material. It is designed to ensure that one does not blindly follow projections based on historic trends but requires one to interrogate the likely continuation of past trends<sup>4</sup>. This is precisely what the Council did in its presentation to the CS inquiry and its paper BNES/26. That exercise is now recognised in the NPPF as a necessary part of the assessment of the housing requirement. In the case of BANES that exercise is crucial for the reasons already explained in detail, Failure to carry out that exercise (and basing the housing requirement only on extrapolation of historic trends) is inappropriate.

27. The added words very deliberately give LPAs the scope to question whether there are factors that might mean that projection is not a reliable forecast.

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<sup>4</sup> and also the sustainability of maintaining or changing a trend.

28. The point does not stop there; The Council has never sought to identify its housing requirement by applying a reductionist critique of the previous projections. Instead it has shown that those projections were likely to be significantly inflated, should be treated with caution and that an alternative or supporting methodology was required – hence the Stage 2 Report. This approach is supported by paragraph 158 of the NPPF – which is an important change to national policy for determine a housing requirement.

29. Paragraph 158 of the NPPF requires that LPAs '*ensure that their assessment of and strategies for housing, employment and other uses are integrated, and they take full account of relevant market and economic signals*'. The reference to integration is new. The Council has explained the logic behind the 'pegging' of its housing requirement against forecast jobs growth and that the ratio based approach makes a generous allowance for demand that is not related to employment growth. This methodology in conjunction with its interrogation of the 2008 based population projections and the publication of the new 2010 projections entirely validates the Councils evidence based requirement for housing provision.

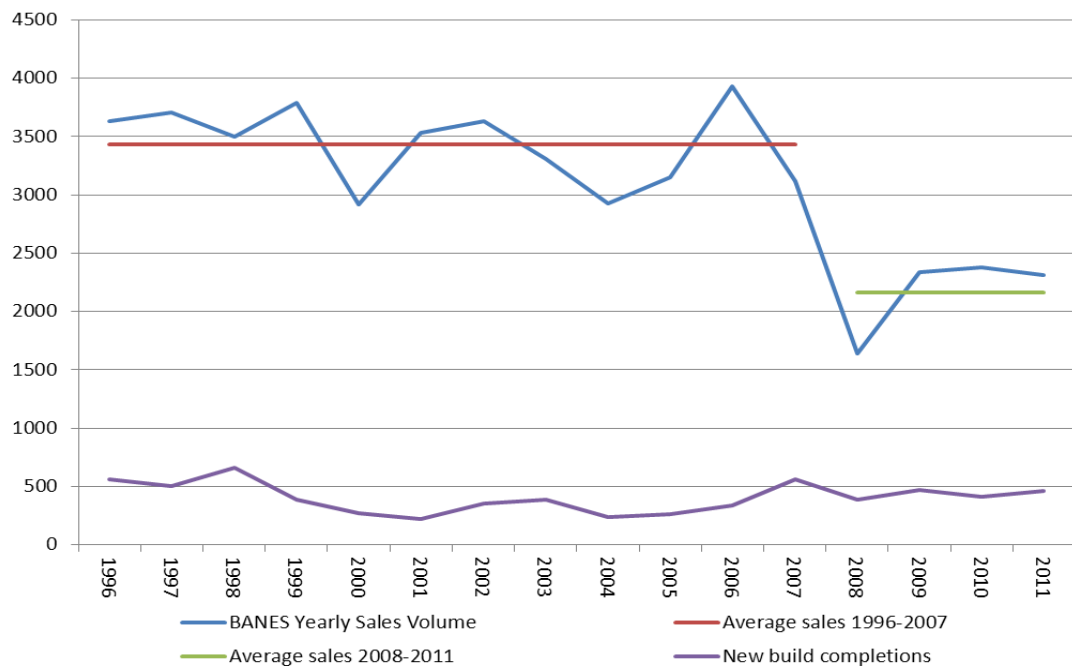
**Should the new requirement for a 20% buffer in the 5 year land supply, where there has been a record of persistent under delivery, (NPPF, paragraph 47, 2nd bullet ) apply to Bath and North East Somerset (in the light of the evidence already submitted on past performance).**

30. No.

#### Local Plan Period

31. The Local Plan shortfall (to both 2006 and 2011) was often quoted during the January hearings. It equates to about 850 dwellings or 12.5% (one year and 10 months' worth) of the LP target of 6,855 1996-2011. The context here is crucial. Overall, the shortfall against the Local Plan target arose during the worst recession in living memory. The four years of poor economic performance since Q4 2008 has significantly dampened pre-recession levels of expressed demand for housing. Although new home completions in BANES were a little higher between 2007 and 2011 compared to 1999-2006, sales volumes were substantially lower. The likely realisation of expressed demand should be seen in this context.

## BANES Overall Sales Volumes and New Housing Delivery 1996-2011



Source: HM Land Registry and BANES

32. Demand that is backed by the means to pay has fallen away, particularly amongst first time buyers, and this has had repercussions further along the housing chain. Low expressed demand is reflected in low levels of new mortgage approvals for house purchases (shown overleaf)<sup>5</sup>. Since 2008 these have been about half the pre-recession trend. The 'statistical' theoretical shortfall of 850 during the LP period needs to be analysed against economic reality.

<sup>5</sup> As distinct from actual mortgage advances

## UK Mortgage Approvals for house purchases 2007-2012

	2004	2005	2006	2007	2008	2009	2010	2011	2012
<b>Jan</b>	127,000	82,000	121,000	121,000	73,000	31,000	48,198	45,723	57,954
<b>Feb</b>	127,000	87,000	115,000	120,000	72,000	37,937	47,094	46,967	49,029
<b>Mar</b>	124,000	93,000	117,000	114,000	64,000	39,230	48,901	47,557	49,860
<b>Apr</b>	120,000	96,000	108,000	109,000	58,000	43,201	49,871	45,166	
<b>May</b>	121,000	94,000	115,000	113,000	42,000	43,414	49,815	45,940	
<b>Jun</b>	110,000	94,000	119,000	113,000	36,000	47,584	47,643	48,421	
<b>Jul</b>	99,000	97,000	117,000	112,000	33,000	50,123	48,722	49,239	
<b>Aug</b>	93,000	103,000	118,000	106,000	32,000	52,317	47,372	52,410	
<b>Sep</b>	86,000	105,000	124,000	100,000	33,000	56,215	47,474	50,967	
<b>Oct</b>	86,000	111,000	129,000	89,000	32,000	57,345	47,185	52,743	
<b>Nov</b>	77,000	115,000	131,000	83,000	27,000	60,518	48,019	52,854	
<b>Dec</b>	81,000	120,000	115,000	72,000	31,000	59,023	42,563	52,939	
<b>Year</b>	<b>1,251,000</b>	<b>1,197,000</b>	<b>1,429,000</b>	<b>1,252,000</b>	<b>533,000</b>	<b>577,907</b>	<b>572,857</b>	<b>590,926</b>	

Source: Bank of England

33. Land supply is not the issue here; it is the ability to sell homes and the lending environment. The reality is that it has been the recession and its impact on lending criteria rather than housing land supply which has been the substantial cause of shortfall against the Local Plan target. This is summed up in paragraph two of the Forward to government's Housing Strategy for England, which reads "The housing market is one of the biggest victims of the credit crunch: lenders won't lend, so builders can't build and buyers can't buy". There are certainly a number of housing sites in BANES (allocated in the Local Plan) that appear not to have come forward (or have come forward at a slow rate) because of these issues. These include greenfield sites at Wellow Lane, Peasedown St John, Withies Close, Midsomer Norton and the redevelopment of the Polestar Purnell factory at Paulton.

34. What constitutes under delivery must take account of a changing macro-economic and housing market context. It would be wrong to attribute under-delivery for the Local Plan period years to a housing land supply issue when all the indicators are – across the UK generally and more specifically locally – that it is macro-economic issues affecting demand which have caused the housing industry not to deliver housing at the expected rate (namely a Local Plan target that was adopted just before the recession).

35. The Council's target for new office space was also set just before the recession. This was based on forecast demand that simply did not materialise, in fact it contracted.

The recession renders the target itself invalid. It cannot sensibly be argued that there has been a shortfall in the delivery of new office space even though the Local Plan target has not been met. The same macro-economic considerations can also be applied to the residential market and planning policy and overall targets for housing.

### Core Strategy Period

36. The annualised delivery rate of the proposed Core Strategy is 575. This equates to an indicative target of 3,450 to the end of 2011/12. Actual completions over the first 6 years of the Core Strategy period total 2,620 (435 per annum). This equates to a 25% shortfall against the average annual cumulative requirement of the Core Strategy.
37. The macro-economic arguments in relation to the end of the Local Plan period remain. Further, the Council has never stated that it is its policy to deliver at the average annualised rate of 575pa from 2016. An understanding of the Council's evidence base and methodology for determining its housing requirement reveals that the majority of the requirement for additional housing in this area (economically active households) is pegged closely to economic and employment growth. In other words, beyond an underlying housing requirement that is related to a trend in falling household sizes, the requirement accelerates when economic growth accelerates. The Council consider that this is demonstrated by recent experience. Clearly, economic performance since 2006 has been poor. Therefore, subject to the realisation of improved economic conditions and employment opportunities, the demand for housing in relation to local employment opportunities will be disproportionately biased towards the later parts of the plan period. On this basis the Council considers it would not be unreasonable for performance to be judged against 40%/60% split in the delivery of the housing requirement either side of 2016<sup>6</sup>.
38. This would result in an annualised requirement to 2016 of 460, increasing to 690 thereafter i.e. 5,290 to the end of the new 5 year time horizon of 2017. This would be instead of a 2017 annualised cumulative requirement of 6,325 (575 x 11 years). In

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<sup>6</sup> Topic Paper 9 (CD6/S10) and BNES/ 5 set out ONS data in relation to economic growth since 2006 and the projections of the OBR for the next 5 years. In April 2012 ONS published data that showed economic contraction in each of the last two quarters. Based on OBRs latest projections GDP will not reach its previous peak of early 2008 until 2014. This is a loss of 6 years' worth of potential net output growth and justifies a more managed approach to housing delivery.

the context of a lower annualised rate to 2016 there is only a minor level of statistical under delivery to 2012 (2,620 achieved against 2,760 cumulative requirement). This would not represent persistent under delivery and would not lead to a need for a 20% supply buffer for the next 5 years.

39. The SHLAA trajectory has been updated on account of the passing of another monitoring year. This is Core Document **CD4/H18**. It shows that 2,620 homes had been completed to the end of 2011/12. It also shows that identified supply for the next 5 years is 3,476 (including a windfall allowance of 280 which is explained and justified in the answer to the next question). The updated 5 year housing supply requirement is set out below, first in the context of an even distribution of 575 per annum and secondly in the context of a 460/690 per annum split. These delivery scenarios are shown in CD4/H18.

**575 per annum**

100% requirement at April 2012  $(11,500 - 2,610) / 14 = 635, \times 5 = 3,175$

105% requirement = 3,333

120% requirement = 3,810

Supply = 3,476

40. It follows from this data that the Council does have a 5 year land supply with 5% buffer at present. It does not have the 20% buffer assuming: (1) the 20% is applicable which it is not for the reasons already given, and (2) one assumes a delivery trajectory that is not managed to reflect the economic situation which will affect much of the first decade of the Core Strategy period.

41. The Council considers that it is valid to manage housing delivery on the basis of a 40/60% split and that this is the means by which housing delivery performance should be monitored. This reflects past and on-going economic realities. It is considered conservative (in the sense of overstating the requirement in the first decade) and generates the following figures.

**430/690 split - target of 4,600 to 2016 with delivery to maintain cumulative pace in relation to 690 per annum thereafter**

100% requirement at April 2012 =  $(5,290^7 - 2,610) = 2,670$

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<sup>7</sup>  $(430 \times 10) + (690 \times 1)$

105% requirement = 2,803

120% requirement = 3,204

Supply = 3,476

42. This shows that the Council, in that scenario would easily meet the 20% buffer - in fact 30%. It also shows that the Council would have delivered 6,096<sup>8</sup> homes to 2017 at an average annual rate of 554 per annum<sup>9</sup>. This would leave a further 5,404 homes to be delivered over the remaining 9 years to 2026.

**Can and should an allowance be the made for windfalls in the 5 year supply (NPPF, paragraph 48) and should any such allowance also be included in the supply for years 6-15.**

43. There is clear evidence in the SHLAA of the contribution that small site completions can make to housing delivery. During the first 6 years of the plan period there have been, on average, 170 such completions a year. If this rate of delivery is projected forward it would yield 850 homes during the next 5 years. As of April 2012 there are already 500 homes with planning permission on small sites. In this context the windfall allowance would be 350.
44. However, following analysis of the source of past windfall delivery, a 20% discount needs to be applied as 20% of small site completions (since 2006) have been on greenfield sites (including residential gardens, barn conversions and other previously undeveloped sites). The windfall allowance would therefore be 280. Once added to identified supply of 3,233 it gives the gives the Council 10% buffer in respect of 5 year land supply on even split across the first and second ten years of the Core Strategy, or a 31% buffer against a 40/60% split in delivery.
45. The NPPF is silent on the inclusion of a windfall allowance beyond the next 5 years. The Council assumes one can be made if evidenced and justified. It would be perverse if this were not the case.

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<sup>8</sup> 2,620 built + 3,476 supply

<sup>9</sup> Actual delivery against the interim target of 4,600 to 2016 would be 5,296 (46% of the housing requirement met halfway through the plan period)

46. Previously the Council argued that the windfall allowance beyond the first 10 years from adoption i.e. after 2022 should be not less than 100 per annum and could be up to 140 per annum, equating to 400-560 units between 2022/23- 2025/26.
47. Applying this rate from 2017/18-2021/22 (the intervening 5 years) would result in an additional 500-700 homes.
48. Given that the lower rate (100 per annum) is substantially discounted in relation to recent delivery of 170 per annum (on account of future uncertainty) is not considered that a further discount need be applied on account of residential gardens. The Council considers that a rate of 100 (net of gardens etc) is appropriate for this area. If pressed to discount, it would merely discount from a figure of 140 per annum, resulting in a marginally higher allowance of 112.
49. Therefore, in total, the Council proposes a windfall allowance of 1,180 to 2026.
50. Identified supply in the April 2012 SHLAA trajectory (updated at the end of the last monitoring year) is now 11,839. This is Core Document **CD4/H18**.
51. The addition of a windfall allowance increases the total supply to about 13,000 homes. There is now a significant buffer or flexibility in respect of the Councils proposed target of 11,500 homes and its evidenced based requirement of 12,100. The total future supply should be seen against the background of the latest population projections and their likely material effect on the household projections. Also relevant is the fact the technical requirement of 12,100 is itself based on a very stretching jobs growth target.



ANNEX 1 – ONS population data in respect of paragraphs 7 and 8

ONS 2010-based sub-national population projection for BANES (Published 21st March 2012). Data extracted from ONS Website.

<http://www.ons.gov.uk/ons/taxonomy/search/index.html?nscl=Population+Projections&nscl-orig=Population+Projections&content-type=Dataset&content-type=Reference+table&sortDirection=DESCENDING&sortBy=pubdate>

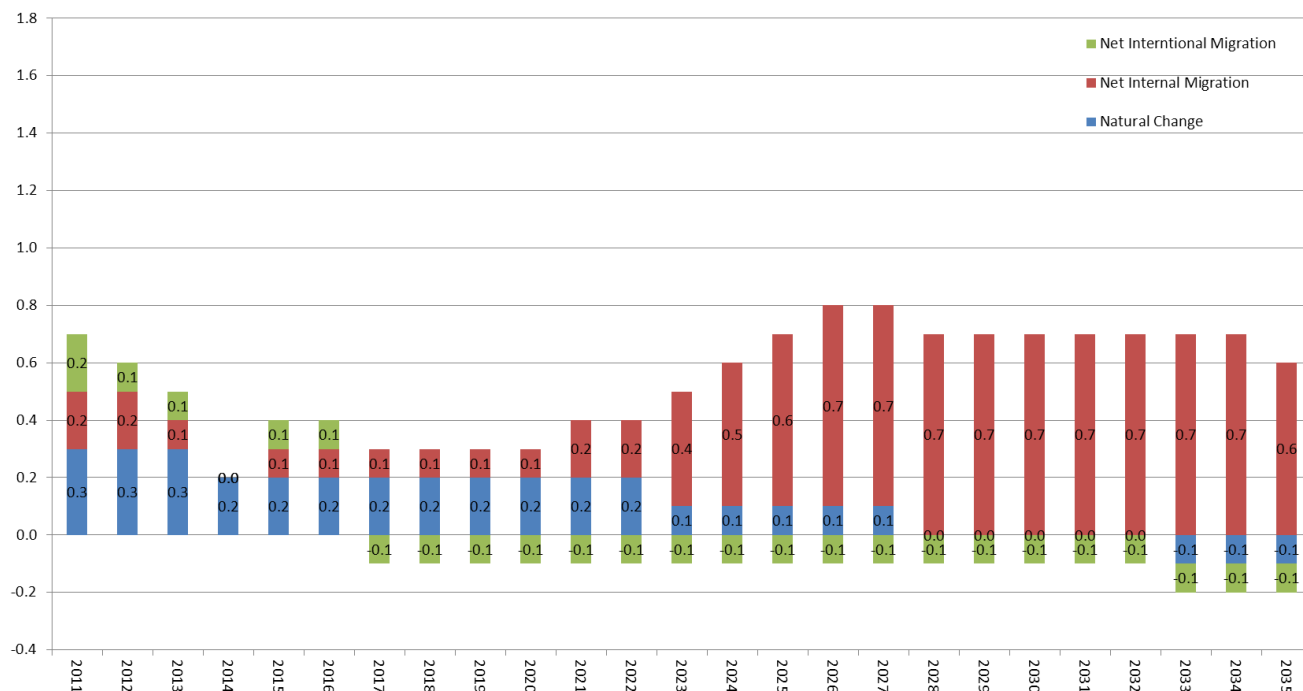
	Mid Year Population Estimate	Estimate Year on Year	2010 based Population Projection	2010 Based Population Projection Year on Year	Births	Deaths	Natural Change	England In Migration	Rest UK In Migration	Total Internal Inward	England Out Migration	Rest UK Out Migration	Total Internal Outward	Net Internal Migration	Internat In	Internat Out	Net Interntional Migration	All Migration Net
2006	173.1																	
2007	175.5	2.4																
2008	177.4	1.9																
2009	177.7	0.3																
2010	179.7	2.0	177.2															
2011			178.1	0.9	1.8	1.6	0.3	11.4	0.8	12.2	11.3	0.7	12.0	0.2	2.1	1.9	0.2	0.6
2012			178.6	0.5	1.8	1.6	0.3	11.4	0.8	12.2	11.3	0.7	12.0	0.2	2.5	2.4	0.1	0.3
2013			179.1	0.5	1.8	1.6	0.3	11.4	0.8	12.2	11.4	0.7	12.1	0.1	2.5	2.4	0.1	0.2
2014			179.4	0.3	1.8	1.6	0.2	11.4	0.8	12.2	11.5	0.7	12.2	0.0	2.5	2.5	0.0	0.1
2015			179.7	0.3	1.8	1.6	0.2	11.5	0.8	12.3	11.5	0.7	12.2	0.1	2.6	2.5	0.1	0.1
2016			179.9	0.2	1.8	1.6	0.2	11.5	0.8	12.3	11.5	0.7	12.2	0.1	2.6	2.5	0.1	0.0
2017			180.1	0.2	1.8	1.5	0.2	11.5	0.8	12.3	11.5	0.7	12.2	0.1	2.5	2.6	-0.1	0.0
2018			180.3	0.2	1.7	1.5	0.2	11.4	0.8	12.2	11.4	0.7	12.1	0.1	2.5	2.6	-0.1	0.0
2019			180.5	0.2	1.7	1.5	0.2	11.4	0.8	12.2	11.4	0.7	12.1	0.1	2.5	2.6	-0.1	0.0
2020			180.6	0.1	1.7	1.5	0.2	11.3	0.8	12.1	11.3	0.7	12.0	0.1	2.5	2.6	-0.1	0.0
2021			180.8	0.2	1.7	1.5	0.2	11.3	0.8	12.1	11.2	0.7	11.9	0.2	2.5	2.6	-0.1	0.1
2022			181.2	0.4	1.7	1.5	0.2	11.3	0.8	12.1	11.2	0.7	11.9	0.2	2.5	2.6	-0.1	0.2
2023			181.6	0.4	1.7	1.5	0.1	11.4	0.8	12.2	11.1	0.7	11.8	0.4	2.5	2.6	-0.1	0.3
2024			182.1	0.5	1.7	1.5	0.1	11.5	0.8	12.3	11.1	0.7	11.8	0.5	2.5	2.6	-0.1	0.4
2025			182.7	0.6	1.7	1.5	0.1	11.6	0.8	12.4	11.1	0.7	11.8	0.6	2.5	2.6	-0.1	0.5
2026			183.4	0.7	1.6	1.6	0.1	11.7	0.8	12.5	11.1	0.7	11.8	0.7	2.5	2.6	-0.1	0.6
2027			184.1	0.7	1.6	1.6	0.1	11.8	0.8	12.6	11.2	0.7	11.9	0.7	2.5	2.6	-0.1	0.7
2028			184.7	0.6	1.6	1.6	0.0	11.9	0.8	12.7	11.3	0.7	12.0	0.7	2.5	2.6	-0.1	0.7
2029			185.4	0.7	1.6	1.6	0.0	12.0	0.8	12.8	11.4	0.7	12.1	0.7	2.5	2.6	-0.1	0.7
2030			186.0	0.6	1.6	1.6	0.0	12.1	0.8	12.9	11.5	0.7	12.2	0.7	2.5	2.6	-0.1	0.7
2031			186.7	0.7	1.6	1.6	0.0	12.2	0.8	13.0	11.6	0.7	12.3	0.7	2.5	2.6	-0.1	0.7
2032			187.3	0.6	1.6	1.7	0.0	12.3	0.8	13.1	11.7	0.7	12.4	0.7	2.5	2.6	-0.1	0.7
2033			187.9	0.6	1.6	1.7	-0.1	12.4	0.8	13.2	11.8	0.7	12.5	0.7	2.5	2.6	-0.1	0.7
2034			188.4	0.5	1.6	1.7	-0.1	12.5	0.8	13.3	11.9	0.7	12.6	0.7	2.5	2.6	-0.1	0.6
2035			188.9	0.5	1.6	1.7	-0.1	12.5	0.8	13.3	12.0	0.7	12.7	0.6	2.5	2.6	-0.1	0.6
2010-2035			11.7				2.9							9.9			-1.3	
2006-2026			10.3															
2006-2035			15.8															

Note Discrepancy between 2010 midyear population estimate (179.9) and base date for 2010 based projection (177.2) potentially related to profiling of mid-year estimates post 2011 Census.



ANNEX 1 – ONS population data in respect of paragraphs 7 and 8

BANES Population Growth 2010-2035 Year on Year Change (1000s)



BANES Population Growth 2008-2033 Year on Year Change (1000s)

