

B&NES Core Strategy Examination
248: RPS on behalf of Crest Strategic Projects and Key Properties

11/12 December 2013 Hearing: The housing requirement and all matters relating to the SHMA

- 1) For the avoidance of doubt, RPS subscribes to the content of the Statement of Common Ground and shares the concerns of the consultancies/developers that contributed towards it. It is acknowledged that those consultancies are providing detailed statements to examine those areas of disagreement; RPS is aware of the arguments that are being made and supports those principles entirely.
- 2) It is acknowledged that the NPPG is still at beta stage and the Inspector has drawn attention to the reference that it will not apply to local plans submitted before the NPPG is finalised. Whilst accepted, the fact is that the NPPG provides 'guidance' that seeks to amplify the provisions of the NPPF. In the sense that it is only guidance, it would be churlish to dismiss it in its entirety since it clearly reflects government intent and good practice.
- 3) The B&NES approach uses past trends as the lead parameter in establishing the housing requirement; whilst there is no doubt that it forms an important part of any assessment, the B&NES model places an undue over-reliance on outputs in the 2001-2011 period to extrapolate forward. As recommended by the NPPG, any appropriate strategy must consider the context for that past period and the extent to which the outputs have been constrained by supply. In the case of B&NES, the restriction in supply during that period is not properly reflected in the ORS approach.
- 4) The Local Plan backlog does not represent a robust view on past rates of under-delivery and does not account for the baseline of unmet housing need; it is merely a figure based on what was considered sound at that point in time, using a methodology that would not be considered sound today. A more robust analysis of market/affordability/concealed household/economic signals over the same period would present a different picture of suppressed need.
- 5) The Inspector's stance following the 17 September hearing session is understood; nevertheless this now leaves the B&NES CS fraught with consistency issues, not least when it comes to establishing the housing requirement and spatial strategy. It is not now the remit of this examination to consider the unmet needs of Bristol (despite the recognition that such need exists and the inevitable role that B&NES will play), however, it is clear that the spatial strategy directs a proportion of growth to the Bristol HMA. Whilst it is easy to get lost within the figures, the simple reality is that people and households within the Bristol HMA can and will choose to live in B&NES; as a consequence there is now an implicit uncertainty as to how a district only model deals with cross-boundary issues in establishing robust housing and spatial strategies.
- 6) In the absence of any appreciation of the impacts of Bristol on the B&NES housing market area it is necessary to take a very robust view of housing requirements in B&NES. A high net migration scenario is a suitable way to allow for this interaction between housing market areas, and may be the only reasonable stance at this time before joint working to examine the housing needs of the real HMAs begins.
- 7) The high migration scenario will also account for past under supply and respond more positively to the 2012 mid-year estimates. In the Statement of Common Ground B&NES confirms that the household and population projections in SHMA Addendum 1a represent the range of outputs based on the data that is available between the 2001 and 2011 censuses.

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Evidently it does not include the 2012 mid-year estimates; there is no doubt that the NPPF requires 'an up to date' assessment and to ensure a significant boost in housing supply. Use of these estimates would avoid any concern over under-estimating the requirement through this examination and go some way to dealing with the Bristol influence, pending an immediate review.

- 8) The examination is likely to extend well into 2014 and adoption of the Core Strategy unlikely much before the end of the year; RPS would not prescribe to the Inspector's query that it might be too late to incorporate the 2012 mid-year estimates not least as they have important implications that will extend far beyond the hearing sessions on 11/12 December. It is the nature of any examination that is already two years in the making that evidence will continue to emerge and will need to be taken into account.
- 9) It is important to adopt a cautionary approach to aligning the housing requirement to closely to employment projections, particularly in a district such as B&NES. There is little doubt B&NES is a highly desirable place to live, as reflected by limited supply and high house prices (which in turn suppresses in-migration and exacerbates affordability issues) and households will chose to live in B&NES regardless of whether their jobs also lie within the District.
- 10) In a similar vein, failure to 'age students' is not a reasonable stance. Given the inherent attractiveness and quality of the environment in B&NES, it is inevitable that many students will choose to remain in B&NES post-graduation. Even if the growth in students could be contained within campus (on or offsite) accommodation, an appreciation of or allowance for their longer term residency is vital.
- 11) The fact that B&NES is seeking to deduct the 2,800 lost jobs from its commitment to meeting LEP targets is testament to the overall sense of suppressing outputs. If the aim is to maintain market share then failing to compensate for the losses is hardly the most practicable means of doing so.
- 12) A reliance of the private rented sector to maintain existing levels of affordable supply is not realistic. Changes to housing benefit and a continued restriction in overall housing supply will inevitably lead landlords to consider higher rents and general sales back to the market. It is not considered that ORS has used appropriate methodology and data to fully address issues of affordability in the District.
- 13) The B&NES stance that it 'over-providing' market housing to fulfil the affordable housing need is contradictory. The NPPF requires that the full market and affordable needs are met. If the market provision is over what B&NES considers the market can absorb then presumably there is no prospect that the affordable needs will be met. It cannot have it both ways. It rather suggests that B&NES has knowingly underestimated the market demand.
- 14) For the reasons set out in its response to Policy DW1, RPS supports the contention at paragraphs 13-15 of ID/40 that B&NES has not calculated the five year housing requirement correctly. B&NES has unhelpfully not provided any additional justification for its stance and it is therefore important to await its own submission before other parties are able to comment further.