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# Bath and North East Somerset Core Strategy Examination

Response to Inspector's Guidance Notes and Questions for Pre-Hearing Statement

September 2013

**Bath and North East Somerset  
Core Strategy Examination**

**Response to Inspector's Guidance Notes and  
Questions for Pre-Hearing Statement**

<b>Project Ref:</b>	14640/A3/PR/JMM		
<b>Status:</b>	Final		
<b>Issue/Rev:</b>	-		
<b>Date:</b>	03 SEPTEMBER 2013		
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Ref: 14640/A3/PR/JMM  
Date: September 2013

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## 1.0 INTRODUCTION

1.1 This statement has been prepared by Barton Willmore, on behalf of Taylor Wimpey UK Ltd and Bovis Homes Limited. It follows representations submitted throughout the preparation of the Core Strategy; as well as an initial response to the Inspector's Questions for pre-hearing statements for the Housing Session on 17<sup>th</sup> September 2013.

1.2 Our initial response to the Inspector's Questions was limited as the majority of questions appeared to be directed to the Council to respond to, rather than other respondents. We had set out our views on these matters in the comprehensive representations we had submitted to the Proposed Changes in the Core Strategy. Having now had sight of the Council's response to the Inspector's Questions, we are now able to provide a more comprehensive response, but will seek to avoid repetition of the points made within previous representations.

1.3 The Inspector's overriding Question for the Hearing on 17<sup>th</sup> September 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 (CP9/H4) in relation to Housing Market Area 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?**

1.4 Barton Willmore has reviewed the Council's response to this question (together with the remainder of BNES/45) in detail and have also reviewed the response received by the other West of England Authorities. We remain of the view that it is wholly inadequate and unjustified for B&NES to suggest that the relevant housing market area for assessing housing needs is confined to the authority boundary.

1.5 We have found ourselves in agreement with many of the conclusions made by the Inspector within his Preliminary Findings and subsequent notes; and particularly within Paper ID/28, where he concluded that the Core Strategy was unsound, due (amongst other reasons) to the lack of an NPPF compliant objective assessment of housing need:

**"Paragraph 159 [of the NPPF] sets out the evidential basis for authorities having a clear understanding of housing needs in their area based on a SHMA, prepared collaboratively where the HMA crosses administrative boundaries. The latter element applies here as the HMA covers the 4 authorities in the West of England Partnership area, Mendip and the former district of West**

**Wiltshire, now part of Wiltshire Unitary Authority”**  
(paragraph 1.1).

And continued,

**“In the absence of a SHMA based on the HMA, there is no up-to-date and NPPF compliant evidence to indicate housing needs of the wider area and whether there may be needs from Bristol that should be accommodated, in part at least, within this district. A cross-border SHMA and the subsequent determination of the optimum spatial distribution of any such future needs around Bristol requires joint working between all the relevant authorities.”**

1.6 As we understood it, this was stating the Inspector’s view that the Plan was incapable of being found sound without a West of England wide SHMA which included joint working with neighbouring authorities and identifying any unmet needs of neighbouring authorities. This has not been undertaken and as such, it would be perverse to find the plan sound now, when this fundamental issue has not been addressed.

1.7 We therefore retain our position that the most appropriate method to objectively assess the housing needs of B&NES and produce an NPPF compliant SHMA is through a West of England wide SHMA. This is for the following reasons (as set out in Barton Willmore’s West of England Housing Study, submitted to the Proposed Changes Core Strategy; relevant extracts of which are appended at Appendix 1):

- The West of England sub regional Housing Market Area has previously been identified as comprising the four unitary authorities by DTZ in 2004 on behalf of the South West Housing Body;
- The 2009 West of England SHMA continues to refer to the sub regional housing market area (HMA) for the West of England identified in 2004;
- The update to the 2009 West of England SHMA published in 2010 finds that 93% of people living in the in the West of England HMA living and work there reflecting a high degree of self-containment and coherence;
- There is a strong and undeniable economic relationship between Bristol and Bath; which together form a strong, highly growth orientated city region, which has formed the basis for the LEP;
- B&NES forms part of the West of England (WoE) LEP. The LEP covers four Local Authorities: Bristol, North Somerset, South Gloucestershire and B&NES; and

together have established and agreed objectives for economic growth over this area, which should be taken into account and reflected in the Council's SHMA;

- The West of England Partnership has prepared a strategic framework to unite the strategic visions of each of the Core Strategies; and a 'Pre-production brief' for a joint Strategic Housing Market Assessment (SHMA) which will include carrying out demographic and economic growth scenarios to inform the quantum of housing required to meet housing need;
- Finally, the West of England LEPs successful City Deal bid recounts that the West of England Geography is a functional economic area boasting over 89% economic containment.

1.8 Rather than accept the available evidence that the West of England forms an appropriate area in which to undertake a SHMA, B&NES have sought to redefine the area and to prepare a SHMA based solely on the Administrative area of B&NES rather than the West of England.

1.9 However, the requirements of the NPPF are clear:

Paragraph 159 of the NPPF states that Local Authorities should have a clear understanding of housing needs in their area; and that

**"they should: prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries."**

1.10 There is a clear indication within this paragraph, and at NPPF paragraph 182, (which requires objectively assessed needs to include unmet needs arising from neighbouring authorities), that Housing Market Area Assessments to establish those objectively assessed housing needs should not be confined to a single local authority. It is clear that a B&NES only SHMA would only ever be capable of answering the question of how much housing is required within the authority and not to meet the requirements of the NPPF of identifying any unmet needs arising from neighbouring authorities.

1.11 Indeed B&NES themselves appear to have recognised that a B&NES only SHMA is not the correct approach and that it should be undertaken in cooperation with neighbouring authorities through the Strategic Housing Market Area Assessment work of the West of England Partnership, of which B&NES is a party. Within the WoE SHMA Framework, the very first paragraph establishes the scope of the report by stating:

**“A SHMA is an objective assessment of local housing needs. These assessments should consider housing market areas, and therefore need to be prepared jointly between neighbouring authorities.”**

1.12 The fact that B&NES can sign up to this approach on the one hand, whilst at the same time denying that this is an appropriate HMA for the purposes of the SHMA for the Core Strategy highlights that there are unresolved tensions in the Council’s approach.

1.13 It seems clear to us that B&NES have devised their own HMA to seek to retrospectively justify housing numbers in attempt to minimise Green Belt release; rather than in order to provide a true picture of objectively assessed needs. There are a number of issues here:

- We have made comments previously suggesting that the appropriate tier HMA should be a tier 1 HMA, covering the West of England Authorities, rather than a tier 2 HMA as has been suggested by ORS’s work;
- Despite the fact that the ORS/CURDS assessment has concluded that only part of the Bath HMA falls within B&NES, the areas falling within West Wiltshire and Mendip have been discounted from consideration; and
- Whilst almost half of the geographic area of B&NES falls within the Bristol HMA, no assessment has been made of any housing needs arising from the Bristol HMA. This is illustrated by the attached map (Appendix 2) which shows the extent of the Bristol and Bath strategic housing market areas, by reproducing the strategic housing market areas defined by the Centre for Urban and Regional Development Studies and published by CLG in 2010. It clearly shows that:
  - The Bath strategic housing market area does not fit into the BANES district and extends well beyond its boundary;
  - The Bristol strategic housing market area extends to cover about half of BANES district by area.

1.14 Whilst the focus of the Session on 17<sup>th</sup> September is intentionally limited to the geographical area of the SHMA, when considering what HMA may be appropriate, one cannot ignore that despite the fact that such a proportion of the B&NES Authority falls within the Bristol HMA, as defined by the ORS HMA, there remains no allowance for accommodating a proportion of the housing needs from the Bristol HMA within B&NES; or to identifying any unmet needs in the Bristol HMA which (in accordance with paragraph 182 of the NPPF) should be taken into consideration in the objective assessment of housing needs.

- 1.15 It is clear that no account has been taken of any housing needs arising from the Bristol HMA within the B&NES evidence base. This was confirmed by paragraph 6.4 of the February 2013 version of the ORS SHMA (which has subsequently been deleted), which noted that:

**“Whilst most scenarios consider the impact of migration to and from surrounding areas (as well as other migration within the UK and overseas), none of the scenarios incorporate a strategic housing allocation to cater from unmet housing needs from adjoining areas such as Bristol.”**

- 1.16 The deletion of this paragraph was justified by the Council suggesting (within paragraph 2.7 of BNES/42) that it gave the impression that the SHMA had itself evidenced an unmet need in Bristol, but that this had been dismissed. The Council continued by suggesting:

**“What it was attempting to clarify was that all the scenarios were related to BANES identified needs only as there was no evidence that an additional allocation re adjoining authorities unmet needs was required. The SHMA did not seek to provide an analysis of the housing requirement of Bristol City Council. Therefore, on the evidence, of the SHMA there was no reason for the scenarios to incorporate a Bristol related allocation and the adopted Bristol Plan did not evidence an unmet need.”**

- 1.17 The current approach by B&NES therefore takes no account of housing needs arising within the Western part of B&NES authority falling within the Bristol HMA despite the requirement of National Planning Policy for local authorities to work with neighbouring authorities in the preparation of their SHMA's.

- 1.18 We recognise there may have been some difficulties in B&NES undertaking work on a West of England SHMA without the other authorities' involvement, however, this is not sufficient justification for the production of a non-compliant SHMA. Whilst there may have been reluctance from the other West of England Authorities to undertake a WoE wide SHMA, we see no reason why it would not have been possible for B&NES to undertake this task on their own had they wished.

- 1.19 A WoE wide SHMA undertaken without cooperation with neighbouring authorities would not have been the perfect response, however if published for consultation the adjoining authorities would at least have had the opportunity to comment upon its findings. The approach taken by B&NES does not even properly assess housing needs within its own

geographic area. It dismisses the need to assess or take account of any unmet need arising from Bristol, despite such a large area of B&NES falling within its authority area.

1.20 We believe that there is reluctance to prepare a WoE wide SHMA because the West of England Authorities both individually and collectively are afraid to ask the question of what the true housing needs in the WoE are, because the answer is inevitable and would identify the need for a significantly higher quantum of housing than is currently planned.

1.21 Therefore the approach taken by B&NES cannot be considered to meet the requirements of the NPPF; and cannot be considered to be justified.

### **Appropriate Housing Market Area**

1.22 Paragraph 3.3 of the Inspector's questions, seeks views

**"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?"**

1.23 Within our representations to the Proposed Changes to the Core Strategy (Section 2 of West of England Housing Sub-regional Housing Study), we set out the justification as to why we consider the appropriate HMA for B&NES that meets the objectives of the NPPF is the West of England sub regional HMA as defined by DTZ in 2004.

1.24 This view has been ratified by the recent publication of the National Planning Practice Guidance, which while still only in draft, provides a firm steer on how housing market areas should be defined:

***"What is a housing market area?"***

A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.

The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work



with all the other constituent authorities under the duty to cooperate” ID 2a-010-130729 (our emphasis).

- 1.25 It is clear in preparing their SHMA, B&NES have not met this requirement. Furthermore, it is clear that in adopting their approach to the production of their SHMA, the role of B&NES as part of the West of England LEP has been ignored. Further guidance has been published within the National Planning Practice Guidance on the need to take account of the role and function of the Local Enterprise Partnership within the Housing Market Assessment:

***“Are Local Enterprise Partnerships and Local Nature Partnerships subject to the duty to cooperate?”***

Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty. But local planning authorities and the public bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making...

This requirement reflects the important role that both Local Enterprise Partnerships and Local Nature Partnerships need to play in strategic planning. Local Enterprise Partnerships have a key role to play in delivering local growth by directing strategic regeneration funds and in providing economic leadership. The commitment of local planning authorities to work collaboratively across Local Enterprise Partnership areas will be vital for the successful delivery of Local Enterprise Partnerships’ strategic plans. An effective policy framework for strategic planning matters, including joint or aligned planning policies, will be a fundamental requirement for this” ID 9-005-130729 (our emphasis).

- 1.26 The National Planning Practice Guidance also highlights the interrelationship between the economic areas and housing market areas and confirms that LEP’s should be a key consideration in establishing functional economic market areas, which in turn influence the extent of housing market areas (ID 2a-012-130729).
- 1.27 The SHMA to be undertaken by the West of England Partnership could respond to this requirement but is not reflected in B&NES SHMA. The approach taken by B&NES has been to ignore the functional relationship between Bristol and Bath; and moreover, the requirement for Local Planning Authorities to work with the LEP in order to support their work.

- 1.28 This weakness appears to be recognised by B&NES themselves, who at paragraph 6 of BNES/45 provide a commitment to participating in the WoE SHMA process as part of the West of England Partnership, and recognise that if the initial stages of work show that B&NES should be treated as part of the wider Bristol HMA, they will do so.
- 1.29 We remain unconvinced by B&NES' arguments within BNES/45 that the SHMA they propose covers the appropriate geographic area on which to base their housing requirement.
- 1.30 We consider that the available evidence, including the findings of B&NES' own SHMA, points to the fact that B&NES is not a self-contained housing market area. The evidence points to the fact that, at the very least, the extent of Bristol's housing market and economic market areas encompass large parts of B&NES. That being the case, carrying out analysis that is confined to district boundaries is simply the wrong approach to objectively assessing housing need across the housing market area as required by NPPF. Further, National Planning Policy makes clear that development need should be assessed in the relevant housing market area or functional economic market area *"because such needs are rarely constrained precisely by local authority administrative boundaries"*.
- 1.31 National Planning Practice Guidance advises that a functional economic market area can be defined by reference to, amongst other factors, the extent of any Local Enterprise Partnership area. The guidance accords with West of England LEPs view that Bristol and Bath are part of the same functional economic area and we are strongly of the opinion that planning for both economic and housing development needs should be carried out simultaneously (in line with NPPF paragraph and across the same spatial area to ensure that growth is fully coordinated and sustainable).
- 1.32 That being the case, housing need should be addressed at the West of England LEP area level.

### **West of England SHMA**

- 1.33 At Paragraph 3.8 ID/35, the Inspector asked what the intended use of the WoE SHMA would be for development planning in B&NES; and whether the geographic scope of the SHMA would sufficiently relate to the HMA to comply with NPPF.
- 1.34 The BNES/45 paper highlights the fact that the Council is unwilling to reconsider its approach to the definition of the Housing Market Area at present. However, it is also suggested that the Council will review their position following the initial stages of the

West of England Partnership SHMA work, and if this concludes that B&NES forms part of the West of England Housing market Area, will take part in this process. It also repeats time and time again, the offer of an early review provision within the Plan to take account of the unmet need arising from neighbouring authorities following their SHMA. It is therefore clearly the view of the Council that this is a potentially appropriate HMA on which to base the objective assessment of housing needs.

- 1.35 The evidence contained within section 2 of the West of England Sub-Regional Housing Study prepared by Barton Willmore concludes that the West of England area is an appropriate Housing Market Area on which to base the SHMA. This conclusion is further supported by the heightened role of LEP's within strategic planning afforded by the recently published National Planning Practice Guidance.
- 1.36 At paragraph 74 of BNES/45, the Council seek to distance themselves from the remainder of the West of England authorities. However, the Council should not prejudge the outcome of the new SHMA and whatever the best fit area might be. Housing Market Areas do not respect administrative boundaries, they invariably cut across them, as is the case here. The CLG research referred to in paragraph 74 of BNES/45 confirms that a substantial part of BANES falls within the Bristol HMA.
- 1.37 For the purposes of assessing economic needs and in line with National Planning Practice Guidance, the functional economic area can be defined taking into account, amongst other things, the extent of the West of England LEP. As such, Bristol and Bath can be considered to be a single economic area, across which strategic planning for housing and economic development should take place. As such it would be entirely appropriate for the SHMA to cover the West of England Housing Market Area to reflect the relationships of Bristol and Bath and the wider LEP area; and we see no reason why this West of England SHMA cannot be undertaken now.

### **Way Forward**

- 1.38 At Paragraph 3.12 of ID/35, the Inspector asked "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?"
- 1.39 The Inspector has been provided with a significant body of evidence from participants that establish the objectively assessed housing requirements across the West of England. The West of England Sub-Regional Housing Study, prepared by Barton Willmore, demonstrates the level of unmet housing need in the West of England is in the region of 48,770 to 74,357 dwellings (2011-2031); and that the appropriate housing

requirement for B&NES should be in the order of 22,000 (2011-2031). This provides the Inspector with an evidence based housing requirement to inform the next stages of the Core Strategy and highlights the level of under provision proposed through the B&NES only SHMA.

- 1.40 Throughout the Council's paper BNES/45, they suggest that an early review would be the appropriate way forward that would allow the Council to take account of the findings of the WoE SHMA if necessary. Indeed this is mentioned so often that it suggests that the Council do not themselves consider the Plan is sound.
- 1.41 This cannot be a sound and robust basis for a Plan which would in effect be an interim plan. Indeed the provisions of Section 112 (7C) of the Localism Act require the Inspector to recommend changes that would make the Plan sound. This does not provide the Inspector with the power to commit the authority to prepare a sound Plan in the future.
- 1.42 The implication of the Council being allowed to adopt an unsound interim Plan with provision for an early review would be significant. It would impact on the locational strategy for major housing development across the district and prevent the establishment of Green Belt boundaries that are sufficiently robust to endure beyond the plan period (both issues highlighted in paragraph 3.10 of ID/35). In addition adopting a Plan that does not take account of the full housing needs of the HMA or meet needs of neighbouring authorities would also have a significant implication on the immediate housing land supply within B&NES. Under providing for housing within the initial period of the plan would only exacerbate existing low levels of housing provision.
- 1.43 We agree with the Council's position that there is a need to progress the Core Strategy to provide certainty to all parties and to allow for the release of green belt land needed in order to respond to housing needs. However, an early review is not an appropriate way forward and moreover there is no mechanism by which to require this to take place.
- 1.44 Within BNES/45, the Council has protested that it would simply not be possible to undertake a West of England wide SHMA within a timeframe that would not result in a further significant period of suspension or undue delays in the adoption of the Core Strategy. However, we see no reason why a West of England SHMA could not be undertaken within a significantly shorter timescale than currently projected. We are aware of cross boundary SHMA's in other cross boundary areas, such as the Partnership for Urban South Hampshire, which set a programme for its consultants for less than 5

months from appointment of consultants to publication of the final report. This timescale is not uncommon and is replicated by the Burnley & Pendle SHMA; and the Peterborough Sub-regional SHMA.

- 1.45 Within their responses to ID/35, the other West of England Authorities have reaffirmed their commitment to working together in the preparation of the joint SHMA. We see no reason why this cannot be undertaken now, within a period of 4-5 months, which could provide an NPPF compliant SHMA that provides an objective assessment of housing needs, taking account of the role and function of the LEP, and quantifying any unmet needs arising from neighbouring authorities to enable a robust and sound evidence base to inform the Core Strategy.
- 1.46 This could also incorporate the additional evidence base from the Placemaking Plan to provide certainty over the extent of Green Belt removal (as has been sought by a number of respondents) required to enable the allocation of specific strategic sites.
- 1.47 It is our view that the following key bits of evidence that the Inspector has previously requested (within ID/28), are needed to advance the Core Strategy :
- An objective assessment of housing needs within the West of England, including taking account of any unmet needs from neighbouring authorities;
  - A detailed review of the Green Belt, identifying any land that could be released; and
  - Identification of additional sites to meet the housing requirements identified through the objective assessment of housing need.

## Appendix 1

iii) **HOUSING MARKET AREA**

2.10 The West of England sub regional Housing Market Area was defined in 2004, by DTZ on behalf of the South West Housing Body as follows:

**“West of England: the core of the West of England sub-regional housing market comprises the four unitary authorities in the former county of Avon, but the influence of the West of England extends further out into Somerset, Wiltshire and Gloucestershire and even over the Severn crossings into Wales. This influence reflects the sub-regions economic dominance of the region”<sup>1</sup>.**

2.17 Published in 2009, the West of England Strategic Housing Market Assessment (SHMA) refers to the sub regional housing market area (HMA) for the West of England identified in 2004. In respect of the West of England HMA boundary, it goes on to identify the principal travel to work areas (TTWA), noting the extensive influence of Bristol:

**“The Bristol TTWA has a significant influence over the wider sub region, extending the length of the HMA with the M5/M4 motorway network and extensive rail links at its core linking it to the South West, Midlands, London and South Wales. The TTWA contains 73% of the employment in the WoE HMA, with 40% of jobs focussed in Bristol City Centre, North Bristol and the North Fringe of Bristol within South Gloucestershire. Its influence extends as far as Weston Super Mare and beyond the WoE HMA into Stroud District. The Bath TTWA has about 13% of HMA jobs, is dominated by Bath and covers most of Bath & North East Somerset, particularly extending its influence south east into Mendip District.”<sup>2</sup>**

2.18 Confirmation of the continuing relevance of the West of England HMA is evidenced by the high level of self-containment therein, as reported in the 2010 SHMA update:

**“Analysis of travel to work patterns supports the current boundary of the housing market area - 93% of people living in the West of England Housing Market area also work in the area showing this sub region has a high degree of containment.”<sup>3</sup>**

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<sup>1</sup> 'Analysis of Sub-regional Housing Markets in the South West', DTZ, 2004

<sup>2</sup> West of England Strategic Housing Market Assessment, Executive Summary, ProfHeriot-Watt University, Edinburgh, June 2009v2

<sup>3</sup> West of England Strategic Housing Market Assessment Monitoring Report, May 2010

- 2.19 More recently, the West of England Strategic Framework<sup>4</sup> identifies the growth potential of Bristol and Bath and the benefits of clustering high growth economic activities around both cities. In economic terms, Bristol and Bath are considered to be at the heart of a region that is home to one of the biggest silicon design clusters anywhere outside of Silicon Valley and a hotspot for creative industries.
- 2.20 In the local economic assessment for the West of England<sup>5</sup>, Bristol is identified as the largest urban area in the South West, complemented by the strategically significant city of Bath. In light of the beneficial economic and functional relationship that exists between the cities of Bristol and Bath, an economic corridor that joins the heart of both cities through Keynsham is identified in local economic strategy (see figure 2.2). Accordingly Bristol and Bath is promoted as a single, highly ambitious and growth orientated, city region:

**“Bristol and Bath is the business powerhouse of the South West of England, where innovation and success are part of the landscape. Where creativity, aerospace engineering, financial services, environmental technology and large-scale industrial distribution businesses are nurtured and developed. Where a highly skilled workforce is never in short supply. And where you’ll have the infrastructure in place to meet your development or business goals, however ambitious”<sup>6</sup>**

- 2.21 The fact that West of England is a coherent economic area and the correct footprint for growth led strategic planning policy is confirmed through West of England LEPs successful City Deal:

**“The rationale behind the four local authorities of Bristol, Bath & NE Somerset, South Gloucestershire and North Somerset working together, is firmly rooted in the economic realities of the city region. The West of England geography is a functioning economic area, boasting over 89% ‘economic containment’. There is a powerful logic for delivering policy connected with economic growth – transport, skills, planning – at this scale. This rationale has underpinned partnership working in the West of England for many years, and was central to our bid to form a LEP in September 2010<sup>7</sup>.”**

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<sup>4</sup> West of England Strategic Framework, Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire Councils, 2013

<sup>5</sup> West of England Local Economic Assessment, West of England LEP, 2011

<sup>6</sup> <http://www.bristolandbath.co.uk/why-bristol-and-bath>

<sup>7</sup> Bristol City Region City Deal, West of England LEP, 2012



- 2.22 As a consequence of BANES integral role within the sub-region in meeting the growth for homes, jobs and labour force, it is essential that BANES future housing requirement is considered in the context of the wider West of England HMA. Failure to properly undertake this comprehensive approach could jeopardise the sub-regional economic aims of the West of England.

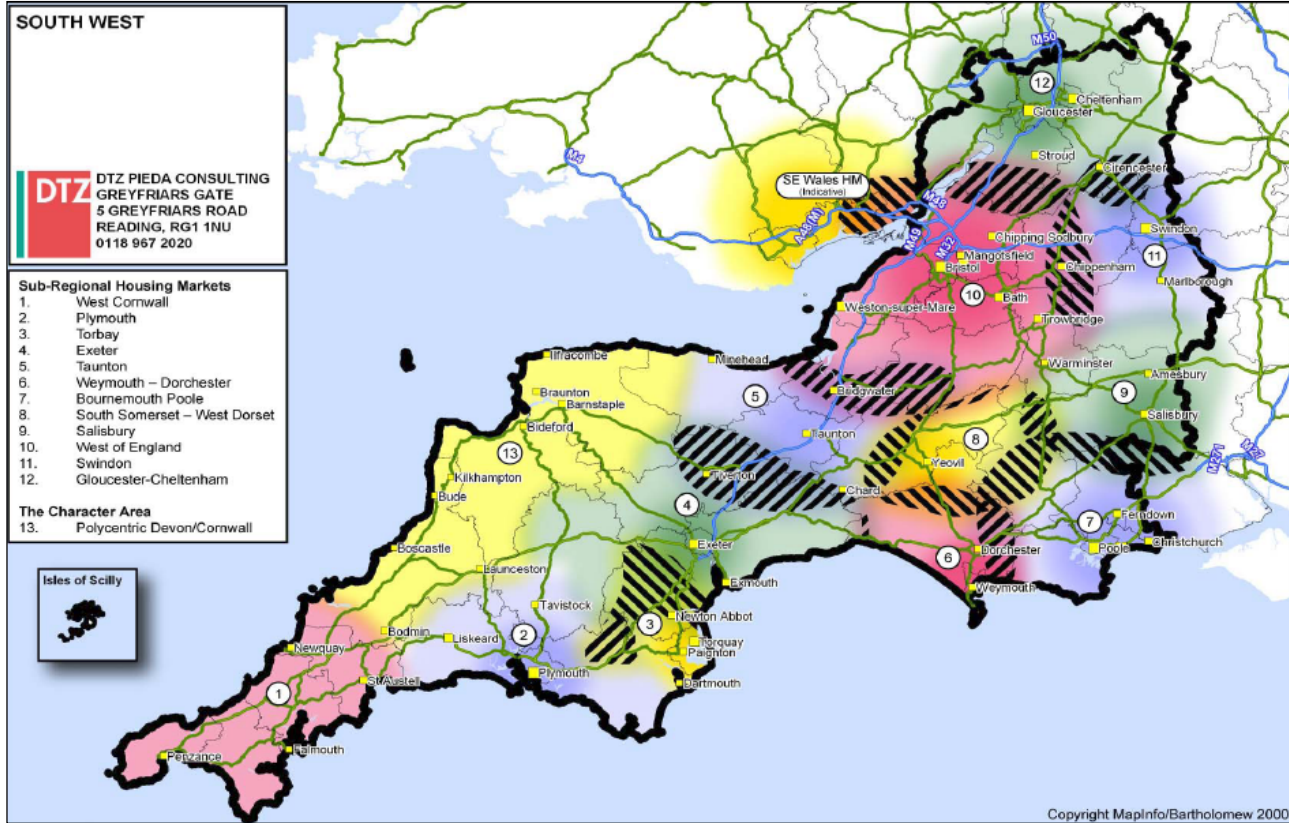
**iii) BANES SHMA update (February 2013)**

- 5.11 The SHMA update was produced by Opinion Research Services (ORS). The SHMA's own analysis considers BANES to be functioning within two housing market areas (Bristol and Bath, with West BANES falling within the Bristol HMA). Whilst accepting this definition might be representative of a tier 2 housing market area (i.e. a local housing area defined by migration) we consider that a more appropriate housing market area for the purposes of this type of assessment is the tier 1 definition (i.e. framework housing market area defined by long distance commuting patterns) particularly given the LEP's objectives, and for the reasons set out earlier within this report.
- 5.12 As such we consider the definition of the West of England HMA as defined by DTZ<sup>8</sup> and set out in the Draft RSS (Secretary of State's proposed changes) is more appropriate. The core of the HMA in this definition incorporates BANES, Bristol, North Somerset and South Gloucestershire, but with influence extending into Somerset, Wiltshire, Gloucestershire and Wales (see figure 5.1 below).

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<sup>8</sup> Page 3, Analysis of sub-regional housing markets in the South West, South West Housing Body, DTZ & Pinda Housing, July 2004; and page 127, The Draft Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes, July 2008.

Figure 5.1: Sub Regional Housing Market Areas in the South West



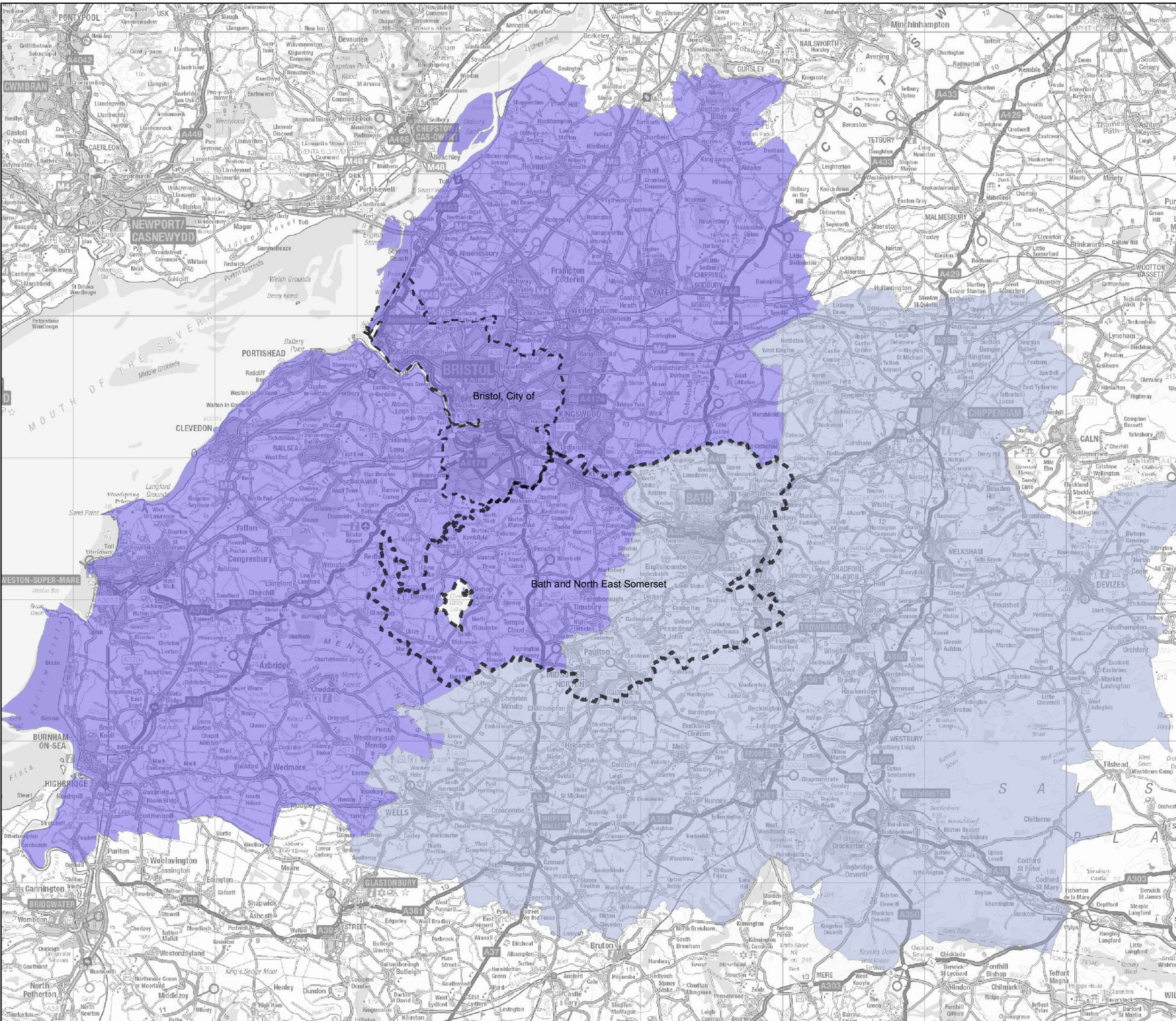
Source: Page 3, Analysis of sub-regional housing markets in the South West, South West Housing Body, DTZ & PIEDA Housing, July 2004; and page 127, The Draft Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes, July 2008.

- 5.13 Notwithstanding this, despite stating that West BANES falls within a Bristol HMA, the SHMA only assesses housing requirements within BANES itself. This does not properly meet the requirements of the NPPF, or answer the Inspector's questions.

## Appendix 2

# Legend

- Bristol Strategic HMA
- Bath Strategic HMA



## Project

Land at Whitchurch  
Bristol

## Drawing Title

Strategic Housing Market Areas from  
Geography of HMAs, CURDS, July 2010

Date	Scale	Drawn	Checked
04.09.13	1:250,000 @A3	VL	JD
Project No	Drawing No	Revision	
14640	GIS01		



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