

B&NES CORE STRATEGY EXAMINATION
SCOPE OF THE STRATEGIC HOUSING MARKET ASSESSMENT (SHMA)

This statement has been prepared by Barton Willmore on behalf of Taylor Wimpey UK Ltd and Bovis Homes in response to the Inspector's Guidance Notes and Questions for Pre-Hearing Statements ahead of the Hearing on 17th September 2013.

We welcome the Inspector's approach in focusing the Hearing Session on 17th September to discussions relating to the geographical extent of the Housing Market Area; and also in allowing participants the opportunity to respond to any additional information that may be contained in the Council's Pre-Hearing Statement.

Many of the issues addressed within the Inspector's questions reflect points that we have previously made within our Representations submitted in response to the consultation on the Proposed Changes to the Core Strategy. Because the Council has provided little further justification as to why they limited their Strategic Housing Market Assessment to the B&NES authority area since we submitted our previous representations, and because the majority of the Inspector's questions are directed to the Council, we do not propose to respond at length to the questions posed by the Inspector at this point. We will however provide a further statement following the Council's response if new information is provided.

Our position remains that we are firmly of the view that the geographic coverage of the Council's new SHMA does not provide an adequate basis for the objective assessment of housing needs in accordance with the NPPF; and that such a departure from national policy is not justified.

We presented our view on the extent of what we consider the appropriate Housing Market Area to be within our Representations to the Proposed Change Core Strategy. Specifically, we confirmed that it is our view that the Strategic Housing Market Assessment should be based on the West of England Area, as defined through work undertaken by DTZ in 2004 on behalf of the South West Housing Board. This was explained within paragraphs 5.14-5.16 of our Open House West of England Housing Study, which formed Appendix 1 to our representations to the Proposed Changes Core Strategy.

We also draw the Inspector's attention to Paragraphs 2.16 – 2.22 of our West of England Study which summarise the evidence to support this conclusion. This includes the West of England SHMA 2009, which identifies the principal travel to work areas and the extensive influence of Bristol in the West of England area; the 2010 SHMA update, which highlights the self-containment of the West of England HMA; and the local economic assessment for the West of

England 2011, which demonstrates the economic and functional relationship that exists between the cities of Bristol and Bath.

Together, the above evidence provides a clear rationale for defining the extent of the SHMA to the West of England area and we do not consider that the current evidence base submitted in the form of the B&NES SHMA provides an adequate basis on which to deviate from this. Neither do we consider that it addresses the concerns highlighted within the Inspector's Preliminary Conclusions (ID28) and we welcome the Inspector seeking further explanation and clarification from the Council as to why they have adopted the approach they have taken.

We are strongly of the view that if the Core Strategy is to be found sound, it is necessary for the housing requirement to be based on a West of England Wide SHMA, which takes account of the housing needs for the entire Housing Market Area and which addresses any unmet need arising from neighbouring Authorities.

We welcome the fact that the West of England Partnership has commenced the initial stages of preparation of a West of England wide Strategic Housing Market Assessment, although we are disappointed with the timescales proposed for the production of the SHMA. Nevertheless, we echo the concerns suggested within paragraph 3.10 of the Inspector's questions, and are of the view that adopting the B&NES Core Strategy on the basis of the B&NES SHMA could undermine the production of the wider West of England SHMA. Specifically, we consider it would predetermine decisions regarding the size of urban extensions and extent of Green Belt to be removed which could conflict with the requirements resulting from the publication of the West of England SHMA.

At paragraph 3.12 of the questions for Pre-Hearing Statements, the Inspector has asked how he should proceed if the SHMA is found to be unsound. Whilst we consider the inadequacies of the SHMA to be so severe that it would require significant revisions and additional work to make the Core Strategy sound, we also recognise that there is a huge need for additional housing, the delivery of which is dependant to a large extent on removal of land from the Green Belt. The council's response to the Inspector's questions for Pre-Hearing Statements could affect what we consider to be the appropriate way forward and as such we reserve our right to comment on this matter until we have had sight of the Council's response to the Inspector's questions.