

BATH AND NORTH EAST SOMERSET
CORE STRATEGY EXAMINATION

CONSULTEE ID – 4588

REPRESENTATIONS

17 September 2013

MATTER

THE SCOPE OF THE STRATEGIC HOUSING MARKET
ASSESSMENT (SHMA)

RESPONSE TO BNES/45

September 2013



PCL Planning Ltd 1st Floor, 3 Silverdown Office Park, Fair Oak Close, Clyst Honiton
Exeter, Devon. EX5 2UX United Kingdom
t + 44 (0)1392 363812
f + 44 (0)1392 262805
email: info@pclplanning.co.uk

-
- 1.1 These representations are additional to those submitted on behalf of the representor in response to the opportunity offered by the Inspector to respond to the Council's submissions in relation to the Questions for Pre-Hearing Statements identified in his note (ID/33).
 - 1.2 Having considered the Council's response there is little further to add to the representor's initial response to the Inspector's questions. However, in an effort to assist the Inspector, a number of brief comments will be made.
 - 1.3 The tone of the Council's response is a little surprising in the light of the Inspector's 'commentary' on HMAs set out in ID/33 with his unequivocal conclusion that BANES does not form a single HMA in isolation. Having regard to the evidence set out in Section 2 of CD9/H4, and that contained in CD4/H11, it is difficult to conclude otherwise.
 - 1.4 The evidence of two SHMAs is therefore that BANES does not form a single HMA confined to its administrative boundary. Indeed, there is no SHMA evidence base that indicates otherwise. It is therefore difficult to reconcile this evidence-based position with that set out in BANES/45. It is also unclear whether the Council is now seeking a different interpretation of the SHMA in an attempt to 'retrofit' its position to its approach which, as acknowledged by the Inspector, does not make any further use of its analysis of HMAs and assesses a housing requirement for BANES for the district as a single entity on its own. Alternatively, it is open to question whether the Council is now seeking to distance itself from CD9/H4 on the basis that it does not provide an up-to-date and/or credible evidence base? The Council's clarification of its current position will no doubt be provided at the Hearing, including why the justification that it has now advanced for setting a BANES-only housing requirement does not form part of CD9/H4.
 - 1.5 The Council goes into considerable detail in rebutting any suggestion that it was required, and/or undertook, to produce a WoE SHMA in the interim period following suspension of the Examination in July 2012. However, this would seem to be an inadequate response to the key issue that has been raised by the Inspector, that being that BANES does not form a single HMA confined to its administrative boundary. The requisite SHMA response to this is not necessarily a WoE SHMA, rather one that satisfactorily assesses a housing requirement for the district based on the HMAs that have been identified and having regard to the duty to cooperate with any relevant neighbouring authorities.
 - 1.6 It may be that the crux of the matter is as alluded to in paragraph 47, that being that the Council has done what it was able to do in the circumstances. Reference is made to cooperation with neighbouring authorities, and this is endorsed by the evidence of those authorities. However, it is unclear how this may have

affected the setting of the housing requirement for the district, and in particular how consideration has been given to whether needs arising within those parts of the HMA that fall within the neighbouring authority areas might be best accommodated within the BANES administrative area. It would be helpful if more intelligence could be provided on this matter at the Examination session.

- 1.7 In conclusion, it is disappointing that the Council's response provides little in the way of convincing evidence that the geographic coverage of their new SHMA (CD9/H4) in relation to Housing Market Areas provides an adequate basis for the objective assessment of housing needs in accordance with the NPPF. However, for reasons set out in their initial Statement, it remains the representor's view that a departure from national policy is justified to enable the Plan to progress in advance of the preparation of a WoE SHMA, subject to adoption of a housing requirement deriving from the tested SHMA evidence base.