

04 September 2013

Delivered by email

Mr C. Banks
Programme Officer
BANES Core Strategy
c/o Banks Solutions
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Dear Mr. Banks

BATH & NORTH EAST SOMERSET CORE STRATEGY: SHMA SESSION OF 17TH SEPTEMBER.

Further to recent correspondence concerning the Inspector's questions set out in ID/35, I write on behalf of my clients Lands Improvement (respondent number 4639) to briefly outline our position at the Examination Session which is to be held on 17th September. In summary:

1. We believe that the Council's response as set out in BNES/45 fails to adequately respond to the fundamental issues raised by the Inspector;
2. The geographical coverage of the SHMA does not provide an adequate basis for objectively assessing housing needs; and
3. As a consequence of (2) above, the SHMA fails to adequately understand the the functional and economic relationship between the cities of Bristol and Bath and does not meet any unmet need emanating from adjoining authorities.

As has been rehearsed previously, the role of the SHMA is set out in paragraph 159 of the NPPF. This confirms that the SHMA is vital in ensuring that the Council has a "clear" understanding of the full housing needs in their area including those emanating from across administrative boundaries. As such, paragraph 94 of BNES/45 seems in direct conflict with the Framework given that it states that

"The housing provision in the B&NES Core Strategy seeks to meet the needs of the District and is not intended to meet any wider needs generated from other parts of the HMA outside B&NES."

Likewise, we fundamentally disagree with the Council's assertion in that paragraph that the current level of provision (12,700 dwellings) represents an overprovision which could provide flexibility to meet needs emanating from elsewhere. In our view and consistent with previous representations, it represents a major shortfall in supply and there can therefore be no certainty or confidence in the position taken by the Council that it represents any form of flexibility.

The Council's response to ID/35 also identifies the geographical coverage of households across three existing HMA's including those in respect of BANES, the wider Bristol HMA, and a Mendip HMA. Conversely, the ORS Report shows the administrative area split between a Bristol focused HMA and a BANES/Mendip and Wiltshire HMA. We share the view of others that such an approach fails to recognise

that, as geographical areas, HMA's are defined by household demand and preferences based on where people live and work and the functional and economic linkages between them.

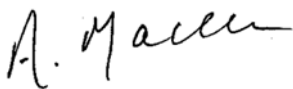
The SHMA Update Report of 2013 demonstrates that, regardless of whether the ORS methodology or the CURDS approach is applied, neither the City of Bath or the other settlements achieve a recognised level of self-containment. In our view this reinforces the need for the SHMA to fully understand the relationships between BANES and all of its neighbouring authorities. This includes the potential for unmet need at Bristol City, which has clear ramifications for the levels of development planned for at south east Bristol (within the BANES administrative area) including Green Belt releases at Whitchurch as well as the implications of restricted supply for example in Wiltshire and Mendip. The fact that, as an example, approximately half of the geographical administrative area of BANES falls within the Bristol HMA bluntly demonstrates why housing need emanating from that HMA must be taken into account in the BANES SHMA..

It is therefore imperative that the SHMA assesses a wider area than that of BANES alone if there is to be any confidence that the emerging Core Strategy is based on an objective assessment of the full housing need and therefore whether it can be considered to be sound. In our view these cross boundary matters are central to the requirements of the Framework and also to the Duty to Cooperate and it seems clear that the Core Strategy fails to satisfy both at this time. Notwithstanding the points raised in BNES/45, we remain of the view that there is no justification for the SHMA to assess housing needs only within the BANES administrative boundary.

We are aware of the views advocated by others at the Examination that the SHMA should be based on the West of England Area. We fully support this position and note that the West of England Partnership has now commenced work on such an assessment. The Partnership covers four local authority areas, these being BANES, Bristol, North Somerset and South Gloucestershire. We therefore respectfully ask the Inspector to endorse an approach based on a West of England wide SHMA as being the sound way of objectively assessing housing need including any unmet need from adjoining authorities.

We very much hope that the above summarises our position for the 17th September Hearing session, however, should you require anything further please do not hesitate to contact me.

Yours sincerely



Alistair Macdonald
Associate Director