Appendix 1:
NORTH SOMERSET DISTRICT-WIDE HOUSING NEED ASSESSMENT

Barton Willmore on behalf of Bloor Homes

November 2011

NORTH SOMERSET DISTRICT-WIDE

HOUSING NEED ASSESSMENT

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1.0 Introduction

1.1 This technical note seeks to provide an up-to-date analysis of the housing requirements for the District of North Somerset and the settlement of Yatton.

1.2 This report utilises Barton Willmore's 'Open House' local housing toolkit in order to set out the local housing need over the plan period to 2026.

1.3 The report is structured as follows:

Section 2:

- National and Regional policy review;
- Local Policy and Evidence base analysis and review;

Section 3:

- Review of published population and household projections;

Section 4:

- Conclusions

2. Planning Policy

National Planning Policy

Planning Policy Statement 3 (PPS3)

2.1 Planning Policy Statement 3: Housing (PPS3) sets out the national planning policy framework for delivering the Government's housing objectives. PPS3 sets out policies and objectives to ensure an evidence-based policy approach has been undertaken in the formulation of Local Development Documents (LDDs) and Regional Spatial Strategies (RSS).[1]. Policies within LDDs and RSS' should be informed by a robust, shared evidence base, in particular, of housing need and demand, through a Strategic Housing Market Assessment (SHMA) and land availability, through a Strategic Housing Land Availability Assessment (SHLAA).[2]

2.2 PPS3 states that in determining the local, sub-regional and regional level of housing provision, Local Planning Authorities and Regional Planning Bodies, working together, should take into account the Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.[3]

Planning for Growth

2.3 The 'Planning for Growth' statement of 23rd March 2011 by the Minister of State for Decentralisation sets out how the planning system has a key role to play in rebuilding the country's economy, by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible.

2.4 The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy. A presumption in favour of sustainable development is considered appropriate to ensure a quick return to economic growth in the country. Local Planning Authorities are expected to make every effort to identify and meet the housing, business and other development needs of their areas and wherever possible support enterprise and facilitate housing. 'Planning for

[1] Paragraph 11, Planning Policy Statement 3: Housing, June 2011
[2] Paragraph 11, Planning Policy Statement 3: Housing, June 2011
[3] Paragraph 33, Planning Policy Statement 3: Housing, June 2011

Growth' also states that Local Planning Authorities should ensure that they do not impose unnecessary burdens on development.

Draft National Planning Policy Framework

2.5 The Government published the 'Draft National Planning Policy Framework' (DNPPF) for consultation on 25th July 2011. The DNPPF's objectives in respect of housing include:

- Substantially increasing the supply of housing;
- Delivering a wide choice of high quality homes that people want and need;
- Widening opportunities for home ownership; and
- Creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of poor housing.
- Provide a minimum rolling 5 years land supply with an additional 20% allowance throughout the plan period

2.6 In establishing housing requirements the NPPF requires Local Planning Authorities to identify the scale and mix of housing that the local population is likely to require which meets household and population projections, taking account of migration and demographic change.[4]

Regional Planning Policy

The Draft Regional Spatial Strategy for the South West 2006-2026 (Published June 2006)

2.7 The District of North Somerset is located within the West of England Housing Market Area (HMA). The Draft RSS set a housing target of 110,200 new dwellings between 2006-2026 (5,510 per annum) for the HMA and a target of **26,000** new dwellings in North Somerset District (1,300 per annum) over the Plan period 2006-2026.

2.8 Policy SR2 identifies that North Somerset has a strategic role in supporting the growth of Bristol as follows:

> **'Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire Councils should plan for the balanced growth of the three urban areas of Bath, Bristol and Weston-super-Mare.'**[5]
> (our emphasis)

[4] Paragraph 28, The Draft National Planning Policy Framework, 2011
[5] Page 56, The Draft Regional Strategy for the South West, 2006

2.9 It identifies the need to deliver 26,000 homes over the plan period distributed as follows:

- Urban extension east of Weston-Super-Mare in North Somerset – **9,000** dwellings;
- Urban extension south west of Bristol in North Somerset area – **9,000** dwellings;
- Within Weston-Super-Mare in North Somerset – **3,000** dwellings;
- Remainder of North Somerset – **5,000** dwellings.

The Draft Regional Spatial Strategy for the South West 2006-2026: Examination in Public Panel Report (December 2007)

Following the Examination in Public, the Panel Report slightly increased the housing requirement to **26,750** dwellings (**1,338** dwellings per annum) in order to accord with the 2003-based DCLG projections.

2.10 Distribution of the **26,750** new dwellings was amended as follows:

- Urban extension east of Weston-Super-Mare in North Somerset – **9,000** dwellings;
- Urban extension south west of Bristol in North Somerset area – **10,500** dwellings;
- Within Weston-Super-Mare in North Somerset – **3,000** dwellings;
- Remainder of North Somerset – **5,750** dwellings.

2.11 In respect of job growth in the Weston-Super-Mare Travel to Work Area (TTWA), the Panel Report updated policy SR6 to new policy SR1.3 which reads as follows:

> **'To enable development at Weston-super-Mare to be economy led provision should be made for 10,000 jobs in the Weston-super-Mare TTWA over the plan period. In addition to the regeneration of the town centre and the sea front provision should be made to increasing the provision of employment opportunities.'** (our emphasis)

Local Planning Policy

North Somerset Core Strategy (Publication Version) January 2011

2.12 The North Somerset Core Strategy Publication (submission of 8th July 2011) covers the period 2006-2026. The CS's vision states:

> **'By 2026 North Somerset will be a more prosperous district, with reduced inequalities throughout. Its coastal and rural setting, underpinned by a rich heritage will strongly influence new development. Development will respond to the challenge of climate change, the move to more sustainable energy use and be characterised**

by high-quality design that contributes to creating successful, thriving places.'

2.13 To achieve this Vision the CS makes provision for **13,400** dwellings 2006-2026 across North Somerset District, a reduction of **-13,350** from the Draft RSS EiP Panel Report target.

2.14 As part of the settlement hierarchy of North Somerset, the settlement of Yatton is classified as a 'service village' in the Core Strategy publication version. The service villages provide a 'hub' for surrounding areas and have a number of services and facilities. The Core Strategy sets out a vision for service villages as follows:

> **'By 2026 the Service Villages will become thriving rural communities and a focal point for local housing needs services and community facilities. They will become more self-contained in terms of providing jobs and serving the local and surrounding community for all their day-to-day needs, whilst protecting their individual character.'**[6]

2.15 In the context of the overall housing provision target for North Somerset (13,400 dwellings 2006-2026), the nine service villages identified in the Core Strategy publication version are proposed to provide 750 new dwellings, which equates to 6% of the overall target. This is set out in Policy CS14: 'Distribution of New Housing' which states that:

> **'In the rural areas new residential development will be strictly controlled although <u>within service villages</u> there will be opportunities for small-scale development either within settlement boundaries or through site allocations.'** (our emphasis)[7]

2.16 The provision of only 6% of the district's housing requirement at the nine service villages is not consistent with the RS with regards to the remainder of the district. The RS identifies the need for 5,700 dwellings in the remainder of the district outside of Weston super Mare, based on the approach that some housing development is appropriate and required in the smaller towns and villages to meet the long term housing needs of the whole District and to ensure sustainable communities throughout the District.

2.17 The approach of the CS prevents the delivery of sustainable communities and development within sustainable settlements of Yatton. This is contrary to the approach of PPS1 and PPS3. We will show in Session Paper 3 that Yatton is a sustainable settlement suitable for development to meet the housing needs of the District.

[6] Page 18, North Somerset Council Core Strategy Publication Draft, 2011
[7] Page 67, North Somerset Council Core Strategy Publication Draft, 2011

2.18 Policy CS32 refers specifically to the service villages as classified by the Core Strategy publication version. The policy reasserts the wider vision for the District and encourages development as follows:

> **'Proposals for small scale development within settlement boundaries which respects the character of the village and supports or enhances the village's role as a local hub for community facilities and services, employment and affordable housing, including public transport will be supported.'**[8]

2.19 In respect of the North Somerset economy, 10,000 new jobs are targeted over the Plan period. Priority objective no. 3 reads as follows:

> **'Prioritise employment growth throughout North Somerset to support greater self containment, in particular by ensuring that in Weston-super-Mare housing development is delivered in step with employment growth, brownfield opportunities in Clevedon, Nailsea and Portishead are maximised, and that small and medium enterprises are supported. Support and promote major employers in North Somerset, such as Bristol Airport and Royal Portbury Dock, to ensure continued employment security and economic prosperity.'**[9]

2.20 In respect of the service villages, the Core Strategy states that each service village normally serves 'one to three' parishes. In the context of the vision for service villages and providing jobs for local people to encourage self-containment policy CS32 reads as follows:

> **'Service Villages are places where a small amount of development (particularly economic, or which extends the range of services available) may be appropriate.'**[10]

2.21 Irrespective of this position, the approach of the CS is contradictory as in respect to employment development at Yatton is highlighted in Policy CS20: 'Delivering a Prosperous Economy' which states that the total indicative land allocations in the District is 113.91 hectares. The policy states that 18.87 (16.5%) hectares of this total is in the 'Remainder of District'. In this context the policy goes on to state that:

> **'The land areas in the remainder of the district are primarily located at <u>Yatton</u> and Backwell with some small scale additional allocation elsewhere.'** (our emphasis)[11]

[8] Page 130, North Somerset Council Core Strategy Publication Draft, 2011
[9] Page 20, North Somerset Council Core Strategy Publication Draft, 2011
[10] Paragraph 4.87, Page 131, North Somerset Council Core Strategy Publication Draft, 2011
[11] Paragraph 3.257, Page 85, North Somerset Council Core Strategy Publication Draft, 2011

2.22 Consequently the CS allows for significant potential employment development in Yatton, presumably as it is a sustainable location for employment but then precludes the ability of the settlement to deliver housing. This is a conflict of approach which is discussed further in Session Paper 2.

2.23 Policy CS21: 'Retail Hierarchy and Provision' supports the notion of retail development and growth within identified centres within North Somerset. Yatton is identified as a 'local centre' outside of Weston-Super-Mare.

North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2026 (October 2010)

2.24 This document (Stage 2 report) was published in October 2010 by North Somerset District Council, and sought to provide *'evidence based guidance as on future housing requirements for North Somerset in the light of changing economic and social trends'*[12]. The analysis carried out within the report is based on four scenarios for the WoE Partnership area relating to potential rates of national economic performance:

- A **central projection** equivalent to UK output growth averaging around 2.1% pa over the medium term.
- A **higher growth projection** consistent with the trend UK trend growth estimate of 2.75% a year after the dip and period of recovery caused by the recession 2007-12 and broadly in line with Office for Budget Responsibility projections.
- A **lower growth projection** consisting of output growth of around 1% in the first 5 years and rising to 1.5% thereafter.
- A **pre-recession trend projection** showing 2.75% pa growth consistently since 2006.

2.25 It is important to note that the document was written in the context of the 2006-based CLG household projections. The document has not been updated to reflect the 2008-based projections as required by PPS3 and the Draft NPPF.

2.26 The 'Potential Options for Testing' put forward by the Council in the context of the economic scenarios set out above are as follows:

[12] Page 3, North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2006 (October 2010)

A. Housing growth meets alternative projected local economic growth levels (high and central national economic growth projection based).

B. As for A, Housing growth meets projected local economic growth levels (high and central growth national projection based), plus allowance for pre-existing housing backlog identified in the West of England SHMA.

C. Housing growth meets recent trend population (migration) growth requirements (ONS sub national projection based).

D. Housing growth meets all SHMA affordable housing requirements by 2026 as required for evaluation by PPS3.[13]

2.27 Before testing these scenarios the Stage 2 report states that Options A and B are the most likely to meet the sustainable development objectives of the Council in line with protection of the Green Belt and the *'poorer national economic prospects'*[14].

2.28 The Stage 2 report moves on to discuss the June 2010 Oxford Economic forecasts for the South West, the West of England Partnership area, and North Somerset. Between 2006-2026 the Oxford Economics forecasts for North Somerset are as follows:

- Central Growth Forecast (equivalent to central projection of 2.1% pa) – **17,000 jobs**
- Stronger Trend Growth (equivalent to high projection of 2.75% pa) – **21,700 jobs**
- Weaker Trend Growth (equivalent to 1% over five years rising to 1.5%) – **13,400 jobs**

2.29 The Stage 2 report considers the Oxford Economics forecasts to be misrepresentative of North Somerset and comments as follows:

> **'Further investigation of the Oxford projections showed that they appeared to suggest surprisingly high levels of relative growth within the North Somerset sectors. As this contrasted to some degree with <u>anecdotal evidence</u> regarding recent local economic growth and future prospects, the projections were re-calculated using West of England average levels of growth per existing job for each of the sectors represented in North Somerset**.'[15] (Our emphasis)

2.30 As the above section of the Stage 2 report states, this re-calculation was made on the basis of 'anecdotal evidence', which by its very nature is not supported by scientific or statistical

[13] Page 18, North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2006, 2010
[14] Page 19, North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2006, 2010
[15] Page 30, North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2006, 2010

analysis. In addition the projections across the much wider West of England region take into account a number of local authorities, many of which do not have the characteristics of North Somerset i.e. supporting the 'Core' city of Bristol. The projections specific to North Somerset are considered to represent more accurate forecasts than an average across the West of England region. However despite this questionable and unsubstantiated position, the method the recalculated employment projections are presented in the stage 2 report as follows:

- Central Growth Forecast (equivalent to central projection of 2.1% pa) – **10,100 jobs**
- Stronger Trend Growth (equivalent to high projection of 2.75% pa) – **15,200 jobs**
- Weaker Trend Growth (equivalent to 1% over five years rising to 1.5%) – **5,900 jobs**

2.31 In consideration of these recalculated results the Stage 2 report comments that:

> **'Given the thrust of the Core Strategy Consultation Draft, and the long-standing concern of the Council to deliver an employment-led strategy to deliver improved self-containment and stimulate investment and regeneration particularly in Weston-super-Mare (Consultation Draft Core Strategy Priority Objective 4, and Policy CS20), <u>it is strongly recommended that care is taken not to limit the potential achievement of these objectives through the setting of too constraining an economic and job growth target.</u>'** (our emphasis)

2.32 In the context of the modified Oxford Economics results, the Stage 2 document considers <u>the most prudent approach</u> to Plan for an increase in 10,000 jobs over the Plan period despite the stronger trend growth figure of 15,200. In the context of the original Oxford Economics projections for NSDC it is considered that this level of growth ignores robust evidence for higher growth, and is unjustifiably cautious conflicting with 'Planning for Growth' and the 'Planning for Prosperity' objectives of the DNPPF.

2.33 In setting a subsequent housing target for the Plan period, the stage 2 report then runs a 'direct method estimate' applying a jobs to homes ratio of 1.33 as set out in paragraph 5.1.4 of the stage 2 report. This results in a requirement for **13,400** new dwellings over the Plan period in respect of the Central Projection. The 'higher growth projection' (2.75%) is calculated as **20,200** dwellings.

2.34 The 'Whole labour market share housing requirement method' is then used, as set out in paragraph 5.1.5 of the stage 2 report. The method uses the 2004 and 2006-based CLG household projections and calculates a housing requirement of **17,000** new dwellings over the Plan period.

2.35 In conclusion the stage 2 report comments as follows:

> **'These figures are considerably higher than those derived from the Direct Method they cannot be said to confirm the 13,400 dwellings (670 dw per annum) arrived at in para. 8.1. However, given the past history of dormitory development in the District leading to high levels of daily commuting to other areas, particularly within the West of England, together with the determination of the Council in the draft Core Strategy specifically to address this issue, it is concluded here that the figure needs to be brought down towards the 13,400 level in order to promote more balanced development.'**[16]

2.36 A summary of the stage 2 report findings is set out in Table 1.1 and the conclusions set out as follows:

- North Somerset's total housing requirement 2006/26 lies within the range 13,400 – 15,000 dwellings (670 p.a. – 750 p.a.);
- Within this total, affordable housing should be in the range 4,000 – 4,500 dwellings (200 p.a. – 225 p.a.), subject to local economic viability testing;
- However the lower end of the range of **13,400 dwellings (670 dwellings per annum)** is recommended as the most appropriate starting point for delivery, but subject to a Plan, Monitor, Manage regime to determine the need for further adjustment in the light of later economic performance

Table 1.1: Summary of Policy Option scenarios 2006-2026

North Somerset	Modified Oxford Employment Projection 2006-26 (95% Confidence interval +/- 2,490 jobs)	Average Housing requirement 2006-26			
		Scenario A: Housing growth meets alternative projected local economic growth levels Average Housing requirement	Scenario B: as for Scen. A plus SHMA*unmet housing backlog	Scenario C: Housing growth meets recent trend population growth requirements	Scenario D: Housing growth meets all SHMA** affordable housing requirements by 2026
Central UK Projection	10,100	13,400	17,019	29,000 – 36,000	28,010
Higher UK Growth	15,200	20,200	23,819	29,000 – 36,000	28,010
Lower UK Growth	5,900	7,850	11,469	29,000 – 36,000	28,010

Source: Table 11, North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2006

North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2026 (October 2011 Revision)

2.37 In October 2011 a revised version of the Stage 2 report was published. This was due to a minor alteration to the new homes to jobs ratio published in the initial report, summarised by the author as follows:

[16] Page 35, North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2006, 2010

> **'Changes have been made to the Stage 2 study following the discovery of a minor, but still significant, error in one of the components of the new homes to new jobs ratio. This element of the calculation incorrectly applied the projected rate of decline in household size for the 20 year period 2001 – 21 instead of the rate for 2006 – 26. Owing mainly to the projected effects of population ageing in the latter part of the whole period to 2001 - 26, the percentage decline in household size is slightly higher for 2006-26 than for 2001-26. This results in a slightly higher value for the ratio, which increases from 1.33 to 1.388, and a consequent rise in the projected housing requirement.'**[17]

2.38 The change in the new homes to jobs ratio has resulted in the increase of the recommended housing target from **13,400 to 14,000** over the Plan period. Table 1.2 summarises the changes between the two versions of the Stage 2 report.

Table 1.2: Summary of Policy Option scenarios 2006-2026

North Somerset	Modified Oxford Employment Projection 2006-26 (95% Confidence interval +/- 2,490 jobs)	Average Housing requirement 2006-26			
		Scenario A: Housing growth meets alternative projected local economic growth levels Average Housing requirement	Scenario B: as for Scen. A plus SHMA*unmet housing backlog	Scenario C: Housing growth meets recent trend population growth requirements	Scenario D: Housing growth meets all SHMA** affordable housing requirements by 2026
Central UK Projection	10,100	14,000	17,619	29,000 – 36,000	28,010
Higher UK Growth	15,200	21,100	24,719	29,000 – 36,000	28,010
Lower UK Growth	5,900	8,200	11,819	29,000 – 36,000	28,010

Source: Table 11, North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2006 (2011 revision)

[17] Page 2, North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2006, 2011 revision.

3. Central Government Projections

ONS Population Projections

3.1 Official ONS population projections have projected a population growth in the order of 1,660-3,380 people a year 2006-2026 for North Somerset, from the 2003-based series to the most recent 2008-based series, published in October 2009. The latter projects a population increase of 67,600 (3,880 people per year) over the Plan period, over double the figure in the 2003-based projections (see table 2.1).

Table 2.1 ONS Population Estimates and Projections for North Somerset

	1981	1991	2001	2006	2011	2016	2021	2026		1981-2006	2006-2026
2008-based	162,900	179,200	188,800	200,800	216,700	233,500	251,200	268,400		105,500	67,600
2006-based	162,900	179,200	188,800	201,400	216,800	233,200	250,100	266,400		103,500	65,000
2004-based (revised)	162,900	179,200	188,800	200,500	211,900	223,500	235,200	246,100		83,200	45,600
2003-based	162,900	179,200	188,800	196,500	204,800	213,300	221,800	229,700		66,800	33,200

Source: Office for National Statistics (rounded to nearest hundred)

DCLG Household Projections

3.2 As Table 2.2 sets out, official DCLG household projections have risen between the 2003-based series (23,000 new dwellings 2006-2026) and the 2006-based series (36,000 new dwellings 2006-2026), and remained consistent in the latest 2008-based series at 36,000 over the Plan period. This represents a rise in the projected demand for new dwellings per annum from 1,150 (2003-based series) to 1,800 (2006 and 2008-based series).

Table 2.2 DCLG Household Estimates and Projections for North Somerset

	1981	1991	2001	2006	2011	2016	2021	2026		1981-2006	2006-2026
2008-based	61,000	72,000	80,000	86,000	94,000	104,000	113,000	122,000		25,000	36,000
2006-based	61,000	72,000	80,000	87,000	95,000	104,000	114,000	123,000		26,000	36,000
2004-based (revised)	61,000	72,000	80,000	87,000	94,000	102,000	109,000	116,000		26,000	29,000
2003-based	61,000	72,000	80,000	85,000	91,000	97,000	103,000	109,000		24,000	23,000

Source: Department of Communities and Local Government (rounded to nearest thousand)

3.3 The ONS projections for population growth (Table 2.1) provides the data required for CLG to estimate housing growth projections (Table 2.2) over the Plan period. It is therefore clear from the data set out above that the population growth informed by the robust ONS

population projections, based on past net-inmigration trends experienced in North Somerset will result in housing demand of 36,000 over the Plan period.

3.4 This is significantly higher than the housing target of 13,400 set out in the NSDC Core Strategy publication version and suggests that NSDC are projecting population growth significantly below that calculated by ONS.

ONS estimates of net migration

3.5 Net migration is a key driver of population change in North Somerset. The recent levels of net migration are shown in Table 2.3. They show that over the long-term period of 2000-2010 net in-migration has been approximately 2,500 per annum. The short-term period of 2005-2010 shows a slightly higher average net in-migration figure of 2,700 per annum. It is important to note that over the last 10 years net inmigration has not been lower than 1,400 (2000-2001), and has exceeded 2,500 per annum in four of the last five years.

Table 2.3 ONS Estimates of Net Migration and Other Change; North Somerset

												Annual average	
	2000-2001	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010		2005-2010	2000-2010
Net Migration	1400	2000	2700	2500	3000	3000	3200	2800	1900	2800		2700	2500

Source: ONS

ONS projections of net migration

3.6 The ONS population projections rely on migration projections which are calculated in a complex fashion using migration propensities by age and from one area to another. The result of that complex process is shown in Table 2.4 for projected levels of net migration. All recent series of projections project net in-migration exceeding 1,900 per annum. The 2006-based series projects net inmigration of 2,900-3,000 per annum over the Plan period. If propensities were to be maintained, the 2008-based projections show that the likelihood is that annual net in-migration could be expected to rise from **3,100** per annum 2009-2018 to **3,200** per annum 2019-2023 and **3,100** per annum 2024-2028. This represents a rise from the short and long-term trends shows in Table 2.3.

3.7 Net inmigration in North Somerset is therefore a very significant factor, reflecting the attractiveness of NSC as a location for people to relocate to who already reside within the UK – their relocation to NSC is for a range of factors: job related jobs within NSC or the adjoining Core City or other areas; lifestyle or family reasons or retirement.

3.8 It is considered that the housing targets of NSDC ignore the robust calculations of ONS and CLG in favour of projections based on 'anecdotal evidence' as set out above. This directly conflicts with Government guidance set out in paragraph 33 of PPS3 which states that Local Planning Authorities should take account of the *'Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts'* when assessing the level of housing provision required.

3.9 In contrast NSC's housing projections are zero net-migration based, thereby relying solely on natural change. The derivation of the housing numbers from employment growth is also artificially flawed as we have presented above. Accordingly the whole basis for delivering only 13,400 homes and 10,000 jobs in NSC over the plan period is fundamentally unsound, as it is not based on the most reliable and credible evidence, does not take account of migration and economic trends and past data by the ONS and therefore does not comply with the requirement of PPS1, PPS3 and the dNPPF.

3.10 Zero net migration is a wholly fictious situation, ignoring the location of NSDC adjoining Bristol, a Core City in the UK and the attractiveness of NSC as a place for working and living.

3.11 In addition to net-inmigration form within the UK, net international migration amounts to between 500-600 net inmigrants a year in the 2008-based series.

Table 2.4 ONS Migration Estimates and Projections for North Somerset, per annum

	2004-06 pa	2009-13 pa	2014-18 pa	2019-23 pa	2024-28 pa
2008-based	-	3,100	3,100	3,200	3,100
2006-based	-	3,000	3,000	3,000	2,900
2004-based (revised)	2,600	2,400	2,400	2,400	2,300
2003-based	1,900	1,900	1,900	1,900	1,900

Source: ONS (rounded to nearest hundred)
Note: Migration per annum within the range of years indicated (specific year differs by base year of projection)

4. Conclusions

4.1 This technical note sets out the housing provision target of North Somerset District Council in the context of National, Regional and Local Planning Policy, and the Central Government housing and population projections. The housing and job growth targets over the Plan period are summarised in Table 4.1.

Table 4.1: Development Plan Housing/Job Targets 2006-2026

	Target Dwellings	Target Job Growth
Draft RSS	26,000	12,900**
Draft RSS Panel Report	26,750	15,700*
NSDC Core Strategy Submission	13,400	10,000
NSDC Stage 2 Report (October 2011 Revision)	14,000	10,000

Sources: CLG, Draft RSS, Draft RSS EiP Panel Report, NSDC Core Strategy submission document.
*Including 10,000 at Weston-Super-Mare
**Including 8,500-10,000 at Weston-Super-Mare

4.2 The North Somerset Core Strategy Publication version was submitted to the Planning Inspectorate for independent examination on July 8th 2011 and plans for **13,400** new dwellings (**670** dwellings per annum) and **10,000** new jobs over the Plan period of 2006-2026.

4.3 The housing target of 13,400 represents a significant reduction from the **26,750** dwellings targeted over the Plan period following the Draft RSS Examination in Public. It is important to note that the Panel Report target was set in the context of the 2003-based DCLG projection of approximately **23,000** dwellings over the Plan period.

4.4 In the context of the 2003-based DCLG household projections, the two most recent Central Government projections have been consistent for the period of 2006-2026 (2006 and 2008-based series), estimating a requirement for **36,000** new dwellings (**1,800** per annum). These projections represent a significant increase from the 2003-based figure used to formulate the Panel Report target, and a significant increase of **22,600** dwellings from the Core Strategy target.

4.5 The CLG projections for new dwellings are further supported by the short (2,700 per annum) and long-term (2,500 per annum) net-inmigration trends experienced in the Borough, and the projections of 3,100-3,200 per annum over the Plan period, an increase to the trends already experienced in the District to date.

4.6 In addition to the targeted level of housing growth for North Somerset, the Draft RSS and the Draft RSS EiP Panel Report target economic growth for the District which includes the creation of 10,000 jobs solely in Weston-Super-Mare. The Panel Report also sets a target for job growth of 92,000 in the Bristol Travel to Work Area (TTWA), within which the vast majority of North Somerset District is located. It is considered reasonable to assume that a proportion of this job target is to be provided by North Somerset District in the context of Regional policy setting out the support role that the District is to provide for the nationally important 'core' city of Bristol.

4.7 It is imperative to analyse the evidence base that has been used for setting the Core Strategy housing target. The figure of **13,400** new dwellings has been adopted following the publication of *'Determining a locally derived District Core Strategy housing requirement to 2006'* in October 2010. Also known as the 'Stage 2 report' the document analysed a number of economic-led scenarios and their influence on housing requirements for North Somerset, as set out above. The analysis used the 2006-based CLG household projections. It is important to note that in the period since the publication of the 'stage 2 report' the 2008-based projections have been published.

4.8 'The Stage 2 report' sought to link projected economic growth with housing growth. The employment growth for the Plan period was therefore based on June 2010 Oxford Economic forecasts. However on the basis of **'anecdotal evidence'** these robust Cambridge Economics forecasts were re-calculated on the basis that they were misrepresentative of North Somerset. This recalculation was made using West of England average levels of growth per existing job for each of the sectors represented in North Somerset.

4.9 The policy option scenarios have been set out in Table 1.1 above, and summarise the options considered for adoption in the North Somerset Core Strategy.

4.10 It should be noted that the October 2011 revision to the Stage 2 report increases the recommended housing provision for the period of 2006-2026 from **13,400 to 14,000**. This is based on a revision to the new homes to jobs ration, from 1.33 to 1.388.