



North Somerset Core Strategy: Examination of Remitted Policies

Agenda 2: Strategic Context

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- 1.0 **Is the Core Strategy prepared within an appropriate strategic context?**
- 1.1 Notwithstanding the legal arguments as to whether the 'Duty to Co-operate' is applicable in this instance, collaborative working with adjoining local authorities on planning issues that cross administrative boundaries is a key requirement of NPPF (paragraphs 157 and 178).
- 1.2 We note that the Council's Statement for Consultation dated November 2013 makes no reference to collaborative working or the duty to cooperate which is of grave concern.
- 1.3 A failure to adequately address the NPPF requirement to co-operate with neighbouring authorities will clearly undermine the robustness of the housing requirements and the soundness of the remitted policies. It would also undermine the delivery of much needed housing in the strategic housing market area.

The Strategic Housing Market Area

- 1.4 Paragraph 159 of the NPPF requires local planning authorities to prepare a SHMA to assess their full housing needs. The SHMA document is required to identify the scale and mix of housing, the range of tenures that the local population is likely to need over the plan period and the need for all types of housing, "*including affordable housing and the needs of different groups in the community*".
- 1.5 Figure 10 of the Edge report (Demographic Analysis and Forecasts) shows that an average of 2,454 people moved from Bristol to North Somerset each year between 2001/02 and 2010/11. Likewise, the 2001 Census shows that commuter flows from North Somerset to Bristol amount to 33% of the total workforce. It is therefore clear North Somerset and Bristol are closely linked and form part of the same Housing Market Area.
- 1.6 It is therefore not surprising that the West of England area, as defined in the West of England Duty to Cooperate Schedule, is the geographical planning area encompassing the Bristol City Council, Bath and North East Somerset Council, North Somerset Council and South Gloucestershire Council.
- 1.7 North Somerset was included within the West of England SHMA, which was produced in 2009 and identified an annual requirement for 1,400 dwellings in

the district between 2006 and 2026. This equates to a housing requirement of 28,000 over the Core Strategy plan period.

- 1.8 Paragraph 24 of the Council's Statement for Consultation states that the 2009 SHMA "remains the current SHMA for the purposes of the re-assessment of the remitted policies". However, work has started on a review to the West of England SHMA although the findings from this review are not expected to be available until 2015 and will therefore not inform the current assessment of remitted policies.
- 1.9 No reference is made to the SHMA in the Edge report and the dwelling requirement that is now proposed bears no clear relation to the evidence contained within the SHMA.
- 1.10 Whilst it is recognised that the affordable housing policy CS16 was not remitted for re-examination, no reference has been given to the housing requirements associated with different groups in the context of the revised housing requirement figure. In this respect, it would appear that the evidence and policy fails to comply with the requirements of the NPPF and the (draft) NPPG.

The need for collaborative working

- 1.11 Paragraph 90 of the Council's Statement for Consultation draws upon Edge Analytics' sensitivity testing in order to justify its selection of the low growth scenario (812 p.a.). It refers to the number of dwellings that would be required to support 10,100 jobs over the Core Strategy period, assuming a reduction in the commuting ratio to 1.1 by 2026 (815). The similarity between this figure and the low growth (812 p.a.) figure is therefore used to justify setting the housing requirement for North Somerset at 17,130 dwellings over the Core Strategy period.
- 1.12 No evidence has been provided to show whether or how a reduction in the commuting ratio to 1.1 might be achieved over the Core Strategy period. Paragraph 154 of NPPF states that "local plans should be aspirational, but realistic". Whilst NLP acknowledges the Council's desire to reduce out-commuting, the scale of reduction that has been assumed could only be realised with the co-operation of neighbouring local authorities.
- 1.13 The Bristol Core Strategy was adopted in June 2011. Paragraph 24 of the Inspectors report "*The Council's assessment of the appropriate level of housing provision for Bristol demonstrates little consideration for the potential implications for adjoining authorities, other than noting that those authorities do not currently support urban extensions in the Green Belt to the south east or south west of the City*". At paragraph 44, the Inspector advises that:
- "There are no other realistically available sources of housing land supply within the City to increase housing provision other than the Green Belt ... a cross-boundary approach would ensure that the size and form of any urban*

extension(s) was properly planned to maximise sustainability, rather than being determined by the rather”.

- 1.14 The Bristol Core Strategy was not prepared under the provisions of NPPF and therefore the housing requirement figure is not underpinned by an NPPF compliant assessment of housing need. The housing requirement figure reflects the unwillingness of North Somerset to support an urban extension in the Green Belt. The existing pattern of migration and commuting are most likely to continue into the future until the full objectively assessed housing needs of the housing market area are addressed in collaboration.
- 1.15 Whilst the Council’s Position Statement dated 7 February 2014 advises that the Council’s plan making process has involved constructive engagement with other local authorities and public bodies on strategic matters (paragraph 11), there is no evidence to demonstrate that agreement has been reached with adjoining neighbouring authorities to increase the delivery of housing in their respective areas to an extent that the aspiration for a 30% reduction in net out-commuting could be achieved. No explanation has been given to support the deviation from the published evidence base in respect of the alignment between jobs and houses. As a result, the Council’s assertion in Paragraph 96 of its statement that “flexibility is provided by the anticipated adjustments to the commuting ratios which over time are likely to decrease the housing requirement” cannot be assured.

Conclusions

- 1.16 The West of England Duty to Cooperate Schedule confirms that the geographical area encompassing Bristol City Council, Bath and North East Somerset Council, North Somerset Council and South Gloucestershire Council comprise a strategic housing market area.
- 1.17 Existing migration rates and commuter flow data clearly demonstrates that North Somerset and Bristol are closely linked. It is untenable for North Somerset to be planning to reverse commuter flows in isolation from an understanding of the impact on housing and employment issues in Bristol.
- 1.18 The Council’s preferred housing requirement figure (17,130) is based on a 30% reduction in out-commuting. This is essentially a self-containment policy that could only be realised if agreement is reached with adjoining LPAs within the SHMA to increase their supply of housing to compensate for the displaced migration. The Council has presented no evidence to demonstrate that such an agreement has been reached following effective collaborative work with adjoining local authorities.
- 1.19 NLP’s objective assessment of housing need indicates a range between 18,000 and 21,000 dwellings. This range represents the level of new housing

that would be required if the Council's commuting aspirations could be achieved. The NLP employment led scenario with commuter rates being maintained constant would result in a total housing requirement of 24,800 dwellings over the Plan period.

- 1.20 NLP consider that the emerging Plan should be based upon an economic-led approach and realistic assumptions, including commuting. NLP consider that an increase in the identified housing requirement is necessary in order to provide the required flexibility to respond to rapid change (NPPF paragraph 14), respond to wider opportunities for growth (NPPF paragraph 17), 'boost significantly the supply of housing' (NPPF paragraph 47) and reflect the appropriate market signals (NPPF paragraph 16).