JOINT SPATIAL PLAN TOPIC PAPER 1
FORMULATION OF THE HOUSING REQUIREMENT V.1

1.0 CONTEXT

Introduction

1.1 The West of England Joint Spatial Plan (JSP) Development Plan Document (DPD) has a purposefully constrained scope, essentially to address the housing, employment and infrastructure needs of the West of England (WoE) sub-region. This paper sets out how the housing needs of the sub-region have been assessed for the purposes of the JSP, how the Housing Requirement for the plan has been derived, for both Market and Affordable Housing. Topic Paper 2 deals with how the four West of England Unitary Authorities (UAs) have responded to this need in formulating the spatial strategy.

National Policy

1.2 Based in the current guidance in NPPF and in the NPPG, the requirements on the UAs in regard to housing needs are, in summary;

Para 14: *to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.*

Para 47 *to boost significantly the supply of housing by ensuring that they meet the full, objectively assessed needs for market and affordable housing in the housing market area (HMA).*

Para 159: to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- *meets household and population projections, taking account of migration and demographic change;*
- *addresses the need for all types of housing, including affordable housing, the needs of different groups in the community eg families,*

older people, people with disabilities, service families and self-build; and

- *caters for housing demand and the scale of housing supply necessary to meet this demand.*

1.3 The NPPG provides more detail on assuming housing need, stating that "t*he assessment of needs is an objective assessment based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints*."

1.4 In September 2017, the Government published consultation on a new standard methodology for the assessment of housing need entitled "*Planning for the right homes in the right places*". This addresses the overall need for housing but not affordable housing or the other components of housing need.

1.5 In the consultation paper, the Government has proposed transitional arrangements to set a period of time before which plans would be expected to use the new method for calculating the local housing need. This includes that if the Plan will be submitted for examination on or before 31 March 2018 or before the revised Framework is published, whichever is later, it should continue to be examined and rely on evidence prepared using the current method. The JSP is programmed to be submitted before 31st March 2018 and therefore, under the transitional arrangements, the new methodology will not apply.

1.6 Based on the Government's proposal that there should be a single assessment of housing need (Planning for the right homes in the right places: consultation proposals 2017); and the emerging 2 tier plan approach (Housing White Paper paras A16 & 17) and the requirements in the Town and Country Planning Regulations 2012 (s8)(5) that the policies contained in a local plan must be consistent with the adopted development plan; the housing requirements established in the JSP will apply to the UA local Plans, and the new standard methodology will not apply.

The role of the JSP

1.7 In preparing the JSP therefore, an assessment has been made of;

- The extent of the Housing Market Areas (HMAs) in the sub-region, and
- the objectively assessed needs (OAN) for market and affordable housing in the HMAs (the "policy-off" assessment)
- Other requirements to facilitate delivery and formulate the Housing Requirement (the "policy-on" assessment).

1.8 The role of the JSP is to address the overall quantum of housing need and the Affordable Housing need. It is the role of the UAs in the Local Development Frameworks to address the more detailed breakdown of housing needs referred to in para 159 of the PPG, including the needs of the travelling community and students.

1.9 The primary evidence base for the assessment of JSP housing need constitutes;

- The Wider Bristol Area Strategic Housing Market Assessment (SHMA) parts 1 & 2
- The Bath Area SHMA
- West of England Housing Target (September 2016).

Past Delivery

1.10 Past housing delivery rates in the West of England are set out in Diagram 1. This shows that the annual average delivery rates for the West of England have been around 4,150 dgs p/a between 2006 & 2017

Diagram 1 - WoE Housing Delivery 2006 to 2017

	2006 /07	2007 /08	2008 /09	2009 /10	2010 /11	2011 /12	2012 /13	2013 /14	2014/ 15	2015/16	2016/17	2006-2017
BCC	2,052	2,428	2,574	2,189	1,739	1,746	878	1,287	1,454	1539	1994	19,880
NSC	1,132	1,474	935	772	637	515	527	760	674	569	852	8847
SGC	689	1,003	916	742	714	923	823	1,095	1,224	1107	1630	10,866
B&NES	334	557	386	470	413	463	550	537	667	809	853	6,039
WoE	4207	5462	4811	4173	3503	3647	2778	3679	4019	4024	5329	45,632

1.11 On Affordable Housing in the 11-year period 2006 – 2017, delivery was only 22% against targets of between 30% - 40%.

Diagram 2 - WoE Affordable Housing Delivery 2006 to 2017

	2006 /7	2007 /8	2008 /9	2009/ 10	2010/ 11	2011 /12	2012 /13	2013 /14	2014/ 15	2015 /16	2016/ 17	2006-2017
B&NES	106	80	65	93	-14	244	137	120	185	178	166	1,360
BCC	488	443	583	553	402	365	290	102	240	180	199	3,845
NSC	126	192	266	149	110	42	211	166	154	126	138	1,680
SGC	75	215	291	281	340	269	223	298	326	263	360	2,941
WoE	**795**	**930**	**1205**	**1076**	**838**	**920**	**861**	**686**	**905**	**747**	**863**	**9,826**

2.0 THE EVIDENCE (The 'policy-off' Assessment of need)

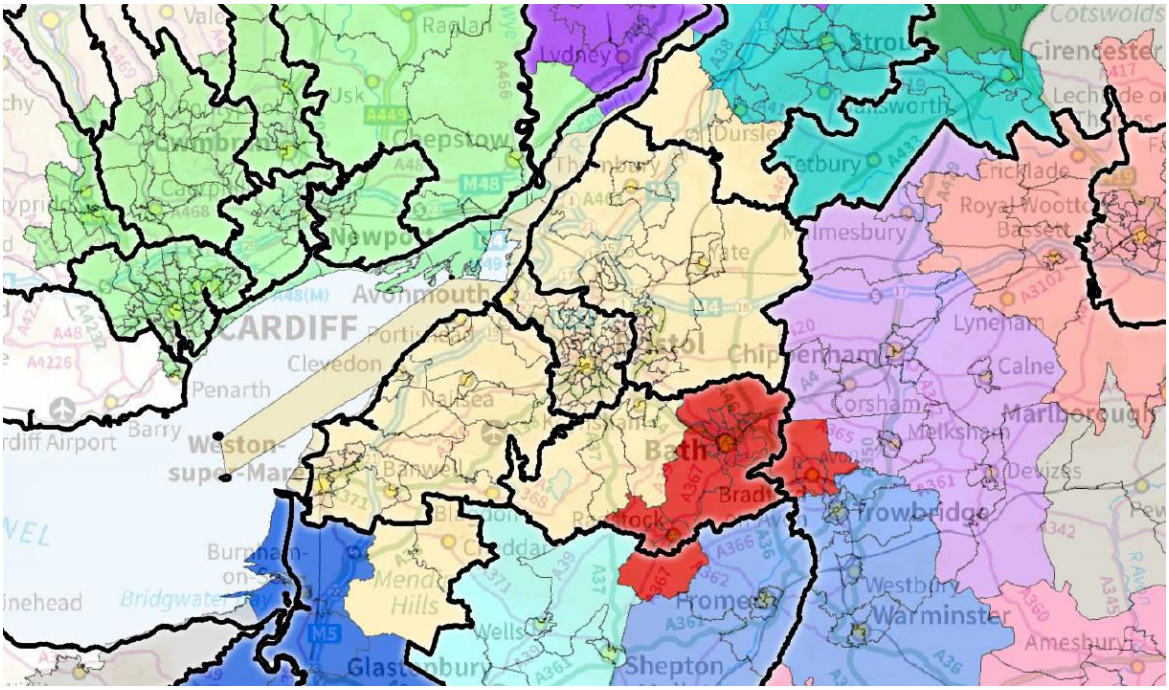
The SHMA Methodology

2.1 The assessment of housing need was undertaken by Opinion Research Services (ORS) for the four UAs. The SHMAs were prepared accordance with the NPPF and PPG and published in 2015. An update was published in September 2016.

Housing Market Areas

2.2 The SHMA identifies two HMAS in WoE, one for the Wider Bristol Area covering Bristol City, North Somerset, South Gloucestershire and limited parts of adjoining districts. It consists of two volumes; and one for Bath covering the eastern parts of the District and limited parts of adjoining districts. The HMAs are shown in Diagram 3 below. Whilst the Actual HMAs cut across District boundaries, the SHMA recommends that for statistical reasons, the proxy for the Wider Bristol HMA comprises the districts of Bristol, South Gloucestershire and North Somerset whereas the Bath HMA comprises the district of B&NES (see Diagram 3b).

Diagram 3a: The Actual Housing Market Areas in WoE



The Objectively Assessed Need (OAN)

2.3 The ORS methodology for assessing housing need is described in the SHMA, (see section 3 of the SHMA), and the outputs are summarised in Diagram 4 below which is an extract from the SHMAs update document “West of England Housing Target” September 2016.

Diagram 3b: The Proxy Housing Market Areas in WoE

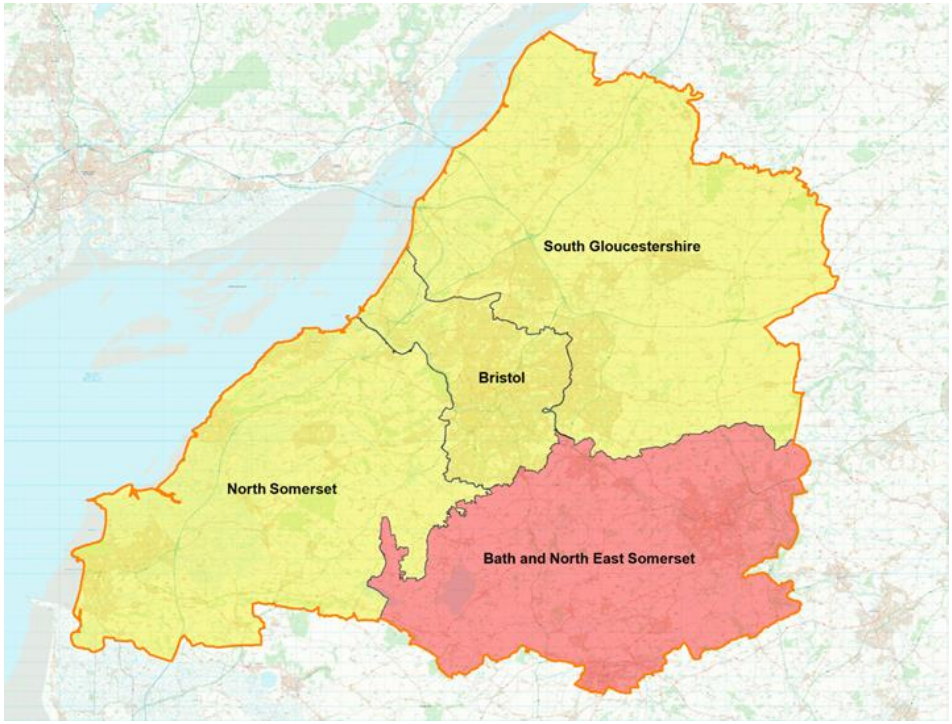


Diagram 4: Establishing the Housing Target

Stage		Wider Bristol HMA	Bath HMA	TOTAL
Housing need based on SHMA household projections		**78,500**	**9,300**	**87,800**
Estimated impact of…	**Changes to migration**	+800	+2,300	+3,100
	Changes to average household size	-2,000	-500	-2,500
Housing need based on updated household projections		**77,300**	**11,100**	**88,400**
Further adjustments needed…	**In response to balancing jobs and workers** Additional dwellings to ensure alignment between planned jobs growth and projected growth in workers	0	400	400
	In response to market signals Dwellings needed (including the specific adjustment for concealed families and homeless households)	**10%** x 77,300 = 7,700	**15%** x 11,100 = 1,700	9,400
Combined impact of the identified adjustments		**7,700**	**1,700**	**9,400**
Updated OAN for the JSP period 2016-36		**85,000**	**12,800**	**97,800**
Allowance for dwellings assumed to be vacated by older people moving into care		3,700	700	4,400
Further uplift to help deliver the identified affordable housing need		The uplift applied in response to market signals will already incorporate this		
Housing Target for the JSP period 2016-36		**88,700**	**13,500**	**102,200**

2.4 Working through its methodology, the SHMA proposes an OAN of 85,000 dgs for the Wider Bristol HMA (WBA) & 12,800 dgs for the B&NES HMA, making a total of 97,800 dgs needed for the sub-region by 2036. This has taken account of demographic projections adjusted for local circumstances, ensuring there will be enough workers for planned jobs, and an adjustment for market signals, 10% for WBA and 15% for B&NES in light of the higher wages to house price ratio.

The overall Housing Target

2.5 An allowance has then been made for dwellings assumed to be vacated by older people moving into care for both HMAs. In response to the NPPG, (Para 029) consideration was given to further increasing overall housing supply to help deliver the affordable housing need but no further additional uplift was considered appropriate (see Annex 1). The overall conclusion is that a Housing Target of 102,200 new dwellings is needed between 2016 and 2036. This is the "policy-off" evidenced need or Housing Target which the JSP should seek to deliver. The need for Affordable Housing is considered in more detail below (see from para 2.7).

2.6 The economic growth aspirations of the sub-region are set out in the Strategic Economic Plan (or the SEP) and have been used to inform the JSP. The four UAs are aware of the uncertainties in economic forecasting, made more difficult by Brexit, but

until further information is available, it is premature to attempt to take account of the implications of Brexit.

Affordable Housing Need

2.7 The SHMA evidences a need of 32,200 affordable homes in the West of England in the period 2016-2036. This equates to 31.5% of the total housing requirement of 102,200 dwellings, and an annual requirement of 1,610 affordable homes. Of the 32,200 affordable homes needed, 29,100 dgs are required in Wider Bristol and 3,100 in B&NES.

2.8 The SHMA uses national policy and guidance for the definition of affordable housing and has regard to local incomes, house prices and rents in arriving at 32,200 figure.

2.9 The four authorities continue to review current and emerging housing products against NPPF definition for Affordable Housing and against local affordability in relation to incomes and housing costs. Any need for products which are not affordable locally have not been included within the 32,200 dg figure.

2.10 The SHMA for Wider Bristol (Vol2) states at para 2.33:

> *'There may also be a role for LCHO products at higher equity shares targeted at households able to afford private rent but unable to afford home ownership. This would help 'widen opportunities for home ownership' (NPPF para 50) but would be in addition to the need to deliver 29,100 affordable homes in the Wider Bristol HMA'.*

2.11 The breakdown of affordable housing need by tenure type has been based on the assumption that up to 35% of gross household income (excluding housing benefit) is available for housing costs.

2.12 The need for affordable housing breaks down between the UAs as follows:

Diagram 5: Breakdown of Affordable Housing need by UA

UA	*Affordable Housing* need 2016-2036
B&NES	3,100
Bristol	18,800

North Somerset	4,800
South Gloucestershire	5,500
West of England	**32,200**

2.13 In conclusion there are 2 key issues that the JSP needs to respond to for the WoE with regard to affordable housing need evidence;

a) the need to substantially increase the overall supply of affordable housing above past delivery rates
b) the spatial disproportionality of affordable housing need.

Other components of need

2.14 The SHMAs, with updates, explain (see para 6.17 onwards of the WBA SHMA) that the Housing Target includes other components of housing need such as students, older people and the travelling community these households are counted as a component of, and not additional to, the figure identified by the SHMA. In light of the defined remit of the JSP it will be the role of the UA Local Plans to provide the policy response in order to address these more specific components of housing need.

3.0 THE HOUSING REQUIREMENT "POLICY ON"

The Housing Requirement

3.1 The evidence-based need for housing, (the Housing Target) is 102,200 new dgs by 2036. The Housing Requirement is the 'Policy-on figure', ie the number of dwellings that the JSP seeks to deliver having taken into account other policy issues and evidence. In particular para 14 of the NPPF requires that objectively assessed needs must be met;

- with sufficient flexibility to adapt to rapid change, or
- unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits

3.2 Topic Paper 2 on the Spatial Strategy shows that whilst it is a significant challenge in seeking to meet the Housing Target of 102,200 dg, the impacts of doing so would not significantly and demonstrably outweigh the benefits in the West of England. Furthermore, in light of the advice in NPPF para 14, the JSP seeks to provide flexibility by increasing the OAN between 5% to 10% ie around 105,500 new dwellings or around 7.5%. This is in addition to the flexibility in Five year Housing land supply evidenced in Topic Paper 2 on the Spatial Strategy. The locations comprising the supply of 105,500 dwellings represent the most appropriate strategy for the sub-region.

3.3 Furthermore, in the interests of delivery, the four UAs have included in the strategy a housing contingency of around 3,000 dgs. In the event that any of the preferred components of planned supply do not come forward, the contingency could be brought forward as a 'Plan-B.' This would entail a revision of the plan as part of the first review to ensure that these are still an appropriate contingency. The contingency is described in more detail in the Spatial Strategy Topic Paper.

3.4 Therefore the policy-on Housing Requirement for the JSP entails a significant boost to the supply of housing of 102,200 net new dwellings to be delivered between 2016 and 2036 with flexibility taking overall supply to 105,500 dwellings, supported by a further contingency of around 3,000 dwellings if needed, taking potential overall supply to around 10% above the OAN of 97,800 homes.

Alternative Housing Requirement proposals

3.5 Through the process of Plan preparation, a number of alternative, higher Housing Requirements have been proposed. The UAs have considered these but maintain the SHMAs undertaken for the UAs remains robust.

The Affordable Housing Target

3.6 Meeting the full affordable housing need is a significant challenge. This is not unique to the West of England; the nature and scale of issues and policy landscape is national.

The Delivery challenge

3.7 The factors that have and will continue to impact on delivery levels include:

- Changes to national policy and guidance;
  - increased thresholds – from November 2014, sites of 10 units or fewer are not required to deliver Affordable Housing
  - introduction of Vacant Building Credit – reduced Affordable Housing requirement on any site with a vacant existing building
  - sites developed under permitted development rights do not require Affordable Housing, including office to residential schemes
  - no Affordable Housing on sites for student accommodation or Extra-Care developed under Use Class C2
  - introduction of products that are NPPF-compliant but do not meet local affordability criteria, such as starter homes costing 80% of open market value

- Market conditions, particularly in urban areas
  - Viability claims, particularly on brownfield sites, and impact of existing and alternative use value and infrastructure requirements
  - Regeneration schemes that can achieve densification by making better use of existing sites but have the effect of reducing the number of Affordable Homes because the number demolished is greater than the number of new Affordable Homes provided as part of a mixed-tenure development.

- Deliverability
  - Some locations are less attractive to Registered Providers (RPs) and other delivery partners
  - Retirement homes provided in flatted complexes often carry inherent delivery and management issues that result in off-site sums being accepted in lieu of on-site delivery
  - Specific locational issues such as rural sites, sites with restricted access, one-off landowner developments.

Although some sites are developed by RP partners at a higher % of Affordable Housing using grant funding or other subsidy and this goes some way to redress the balance, the numbers are relatively low.

The JSP AH Policy

3.8 In formulating the JSP, the UAs have assessed a range of options to increase the supply of AH as summarised in Annex 3

3.9 The high level of need for Affordable Housing and the shortfall in both past and projected delivery, justifies the need to maximise delivery from all possible sources. Through this process the UAs have therefore formulated a policy framework which gives significant priority to the delivery of Affordable Housing, and this is set out primarily in JSP Policy 3. This entails;

- Making Affordable Housing delivery a priority in the Plan with a challenging requirement of 35% on all new sites;
- requiring policy compliance at nil public subsidy and where a proposal is demonstrably unviable, to provide that public subsidy or other forms of investment will be sought and secured to make up the shortfall;
- requiring small windfall sites to contribute to the supply. Affordable Housing will be required on all sites of 5 dwellings or more, or larger than 0.2 hectares (whichever is the lower);
- The demographics demonstrate an increasing need for suitable specialist housing for older people, including Affordable Housing. This is an added justification (on top of the imperative to increase delivery from all possible sources) for a requirement for all self-contained housing for older people to contribute towards meeting Affordable Housing need regardless of the level and type of care available, including proposals that come forward as Use Class C2;
- The same approach will be taken for student housing. In Bristol in 2016/17 there were 1994 completions of which 199 were Affordable Housing and 700 were student dwellings (providing 1237 bedspaces). In this context it is entirely justifiable that student housing should contribute towards delivering Affordable Housing;
- The full range of Affordable Housing tenure types and unit mixes to meet the needs evidenced by the SHMAs will be required;
- Affordable homes are to be provided on-site unless robustly justified in exceptional circumstances where an off-site provision or an equivalent financial contribution in lieu of on-site Affordable Housing may be acceptable, to be used for the provision of new Affordable Housing;
- requiring the Affordable Homes to remain at an affordable price in perpetuity or for the subsidy to be recycled for alternative Affordable provision, so that maximum value is generated and future eligible households can also benefit.

Future Affordable Housing Supply

3.10 The JSP spatial strategy (See Topic Paper 2) enables the generation of Affordable Housing as set out below;

a) **Existing commitments -** for the period 2016-2036 61,500 total dwellings are projected to be delivered, of which 13,000 will be Affordable Housing.

b) **Current forecasts for unidentified sites**

c) **Small windfalls** – due to the high level of need for Affordable Housing and the shortfall in past delivery, there is a need to maximise delivery from all possible sources. The policy therefore requires Affordable Housing to be provided on all sites of 5 dwellings or more, or larger than 0.2 hectares (whichever is the lower). It has been assumed that 6,800 dwellings will be delivered from small windfalls of which 1,000 will be Affordable Housing.

d) **Urban Living –** the forecast for delivery of Affordable Housing on unidentified brownfield sites has generally been based on historic outturn using a capacity based assessment rather than individually site based. Delivery at a rate lower than policy level has been assumed because of the likely nature of the sites involved. However delivery will be maximised by increasing densities in urban locations. Current projections assume that Urban Living sites will deliver a total of 16,200 dwellings of which 3,280 are expected to be Affordable Housing.

e) **Non-strategic growth** – the forecast assumes a policy compliant position of 35% Affordable Housing, using developer subsidy where fully viable, and bringing in public subsidy to make up any shortfall where full delivery is unviable. Current projections are based on non-strategic growth sites delivering a total of 3,400 dwellings of which 1,190 will be Affordable Housing.

f) **Strategic Development Locations** – the forecast assumes a policy compliant position of 35% Affordable Housing, using developer subsidy where fully viable, and bringing in public subsidy to make up any shortfall where full delivery is unviable. Current projections are based on the current 12 SDLs delivering a total of 17,600 dwellings of which around 6,000 will be Affordable Housing.

3.11 The table below shows the breakdown of expected Affordable Housing delivery between 2016 and 2036.

Diagram 6: Projected Affordable Housing delivery to 2036

Supply Source	***All Homes***	***Affordable Homes***
Commitments in existing Plans	*61,500*	*13,000*
Contribution from Urban Living, non-strategic growth and SDLs	*44,000*	*11,500*
Total	***105,500***	***24,500***

NB Figures rounded up

3.12 As a result the JSP is able to set an ambitious target of 24,500 net new Affordable Homes by 2036, which amounts to 76% of the total need. This is set out in JSP Policy 3.

There is a gap between the level of need and planned number of affordable homes that realistically can be delivered by the development industry based upon the current delivery model. It is clear that it is unrealistic to expect for the Plan alone to meet the full amount of affordable housing identified. Clearly the UAs will need to work with partners and use other mechanisms on top of the planning system to maximise the delivery of affordable homes. The four UAs have worked proactively together to identify additional funding opportunities and delivery mechanisms to boost projected delivery.

3.13 Other areas in the country have experienced the same issues and have therefore set out what can be achieved through their respective Spatial Strategies. For example, The London Plan (see 3.11 Affordable Housing Policy) includes a delivery target of 66% of the affordable housing need. The high level of need for Affordable Housing justifies a policy approach that maximises delivery from all possible sources. The four UAs have reviewed their approaches to ensure they have identified all options within their own control to maximise delivery.

3.14 A high level assessment of the capacity and appetite of Registered Providers to deliver Affordable Housing was carried out in May/June 2017. This demonstrates that there is the capacity locally to deliver the Affordable Housing target of 24,500 homes, and that additional capacity is available to go further towards meeting the total Affordable Housing need in the West of England, if the opportunities are available.

Spatial disproportionality of need

3.15 The Affordable Housing need across the WoE has to be addressed within the Plan. Each UA has had to consider how to meet its own Affordable Housing need but in addition how the overall WoE need can be met.

3.16 The majority of the Affordable Housing need is derived from Bristol, however current projections identify that this cannot be provided within Bristol because the scale of the need is too great, and the availability of suitable sites is limited. Many residential sites in Bristol have high redevelopment costs due to their brownfield status.

3.17 A balance needs achieving of meeting a UA's Affordable Housing need and contributing towards provision of Affordable Homes to also address Bristol's need, some of which will depend on location and spatial strategy.

3.18 In order to achieve this balance the four UAs have identified in the Plan that the Strategic Development Locations (SDLs) and other strategic locations within or well-related to the Bristol urban area must contribute to addressing the Affordable Housing need of Bristol as well as their own local need. The Affordable Housing contribution to assist meeting Bristol's need will be provided through on-site provision with the option of off-site contributions in locations less well-related to Bristol, to be spent on providing Affordable Housing.

3.19 Delivery mechanisms will be determined through Supplementary Planning Document(s) and will include:

- nomination rights in favour of Bristol or other appropriate arrangements for the allocation and sale of the Affordable Housing where Affordable Homes have been provided on a site within another UA area to meet Bristol need;
- details for where and when financial contributions are acceptable and the calculation of any financial contributions in lieu of on-site Affordable Housing;
- Where financial contributions are accepted to address Bristol's need, they should:
  - be held in a West of England Housing central pot
  - be retained for a maximum of ten years or to the end of the JSP period, whichever is the later, in order to maximise the opportunity to spend.

3.20 In order to meet the need, Affordable Housing must be provided that meets the needs as evidenced by the SHMAs (or updated evidence) in the full range of Affordable Housing tenure types and unit mixes. This will be set out in detail in the SPD.

4.0 MONITORING & REVIEW

4.1 The four UAs will continue to co-operate on monitoring arrangements and delivery of the spatial strategy and its Housing Requirement will be reported by the four UAs and through their Authority Monitoring Reports. The outputs will be taken into account in the preparation of the Mayoral Spatial Plan, taking account of the five yearly review proposals and the contingency set out in Policy 2 of the JSP. The Spatial Strategy Topic Paper sets out the approach to monitoring 5 year Housing Land Supply.

Annex 1:

Options to improve supply of affordable housing

The four UAs have reviewed their approach to identify any opportunities to boost the Affordable Housing trajectory since the Workshop on 1st December 2016.

Four categories have been explored in more detail:

Additional subsidy	The UAs have taken a robust approach to identify potential double-counting and have been cautious about assumptions of future public subsidy, as future programmes are unknown. It is reasonable to assume that some additional Affordable Housing may be funded under future Government supported programmes, but this has not been included in the target of 76%. Assumptions about new Government housing related infrastructure programmes (such as Housing Infrastructure Fund) have been excluded at this stage, due to potential overlap with the assumptions already made that subsidy will top-up any unviable Affordable Housing.
Taking control	All four UAs are actively considering ways to take better control of delivery including setting up of Housing Companies. The Affordable Housing target takes account of the current Bristol Housing Company programme.
Increased requirement	Increasing the overall housing requirement by applying an additional uplift above that already included in the assessment was considered in the 2016 consultation. While there may be some effect on increasing affordable housing, this is not in itself the solution. A more radical change was needed than a simple additional uplift. It was agreed through more recent consultation processes that a suite of options will be needed as a pragmatic response to boost the supply of affordable housing alongside the prioritisation of affordable housing provision through the JSP, which involves changes to current policies to maximise supply, as well as the additional flexibility and contingency approach taken on setting the WoE Housing Requirement.
Building partnerships	A Statement of Commitment is being progressed which will set out RPs' commitment to invest in new Affordable Homes in the West of England.

The diagram below identifies the current sources of potential additionality to AH supply that may come forward within the lifetime of the Plan. An additional 1500 Affordable Homes from these sources would boost delivery to at least 80%:

	potential additional AH that has not been included in any previous calculation
1	additional units from LA capital funding programmes
2	potential LA and other publically owned sites not already accounted for (at policy compliant level and potential for developing at higher than 35%AH)

3	potential additional funding from HCA not already included
4	potential for additional units arising from institutional investment
5	additional funding via potential WECA Enabling Fund i.e. infrastructure funding, additionality
7	additional AH that could be delivered by Housing Companies
8	additionality via estate regeneration, in addition to Urban Living

Background Papers

1. National Planning Policy Framework 2012
2. National Planning Practice Guidance
3. Wider Bristol Area SHMA Vol 1
4. Wider Bristol Area SHMA Vol 2
5. Bath & North East Somerset Council SHMA Update
6. Housing White Paper – Fixing our Broken Housing Market 2017
7. Government consultation paper 2017: Planning for the right homes in the right places: consultation proposals