BRISTOL CORE STRATEGY OVERALL HOUSING PROVISION
Bristol City Council Position Paper, October 2010

1. Purpose of Paper

1.1 This paper addresses the approach to the level of housing provision to be included in the Bristol Development Framework Core Strategy. It has been produced in the light of changes to national planning policy and follows the discussion at the examination hearing session on 7 September 2010 where these issues were discussed. The paper addresses the matters raised in the Inspector's note of 8 September 2010.

1.2 The paper supports the Council's proposed changes to Core Strategy policy BCS5 which are set out in Appendix 1.

2. Changing National and Regional Policy Context

2.1 Preparation of the Core Strategy was commenced in the context of an emerging Regional Spatial Strategy (RSS). The draft RSS indicated that 28,000 homes should be built in Bristol from 2006 to 2026, with 1,500 specifically identified as being within the Green Belt in the southwest of the city with the remaining 26,500 within the built up area.

2.2 The then emerging RSS was subject to an examination in public. The examination panel recommended to the Secretary of State that the level of homes for Bristol should be increased to a total of 30,000 homes, with 1,500 in the Green Belt in the southwest of the city with 28,500 within the built up area.

2.3 In July 2008 the Secretary of State proposed changes to the emerging RSS which would have raised the level of homes to be delivered in Bristol to 36,500, with 33,500 within the built up area and a total of 3,000 in the Green Belt in the southwest and southeast of the city.

2.4 In the context of the then emerging RSS the Bristol Core Strategy Publication version November 2009 proposed a minimum housing level of 30,000 homes with contingencies for the delivery of more in the event that the RSS was eventually approved in line with the Secretary of State's proposed changes.

2.5 Following the general election in May 2010 the new Government revoked existing Regional Spatial Strategies and the preparation of the emerging Regional Spatial Strategy for South West England was abandoned. In the absence of regional spatial strategies local planning authorities were given responsibility for establishing the right level of local housing provision in their areas, and identifying a long term supply of housing land. Guidance issued by the Department of Communities and Local Government in July 2010 indicated that local authorities should continue to collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process; and that this should be done in line with current policy in PPS3.

3. Assessing an appropriate level of housing for Bristol

3.1 Pending the introduction of the Government's new National Planning Framework, PPS3 has been retained. Paragraphs 32 to 35 set out the approach to assessing an appropriate level of housing. However, the approach in the PPS was based on a regional structure and the section is, therefore, not directly applicable to the determination of an appropriate level of housing by local planning authorities in the new national policy context. However, paragraph 33 refers to a number of factors to be taken into account in determining housing provision which continue to have relevance. These are, in summary:

- Evidence of current and future levels of need and demand for housing and affordability levels based on:
  - Local and sub-regional evidence of need and demand[1], set out in SHMAs and other relevant market information such as long term house prices
  - The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts

- Local and sub-regional evidence of the availability of suitable land for housing using Strategic Housing Land Availability Assessments

- The Government's overall ambitions for affordability across the housing market, including the need to improve affordability and increase housing supply

- Sustainability Appraisal

- An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required

Some of the elements of paragraphs 32 to 35 are no long readily applicable with the shift from regional to local determination of housing levels. These are:

- *Advice from National Housing and Planning Advice Unit on the impact of proposals for affordability in the region (referred to in paragraph 33)* - this relates to the region as a whole and the Council considers this element of PPS3 is no longer applicable to local determination of the appropriate level of housing. The NHPAU was recently closed by the Government and its advice on the impact of proposed housing levels in Bristol for affordability in the region cannot be sought.

- *Paragraphs 34 and 35* – these both relate to regional spatial strategies and are, therefore, no longer relevant.

The following paragraphs explore each of the relevant matters referred to in PPS3 paragraph 33 as they apply to Bristol:

- **Evidence of current and future levels of need and demand for housing and affordability levels**

  - **Need and Affordability**

3.2 The council's evidence base for housing affordability[2] and housing need[3] is set out in the West of England Strategic Housing Market Assessment (SHMA) 2009. The assessment draws on a suite of integrated models which aim to predict the operation of the housing market, demographic patterns and existing and future affordability and housing need.

[1] PPS3 Annex B defines housing demand as the quantity of housing that households are willing and able to buy or rent..
[2] A measure of whether housing may be afforded by certain groups of households.
[3] The quantity of housing required for households who are unable to access suitable housing without financial assistance – PPS3 Annex B.

3.3 Key inputs to the modelling include economic forecasts, demographics, housing supply, incomes, house prices, private sector rents, social relets and affordable intermediate resales. Two of the most important inputs to the modelling are economic growth and household growth. The baseline value for the longer term economic growth rate for the region (after 2011), measured as Gross Value Added (GVA), was assumed to be 2.8%. In terms of household growth inputs, itself a product of the modelling, these are comparable with the DCLG Revised 2004-based household projections.

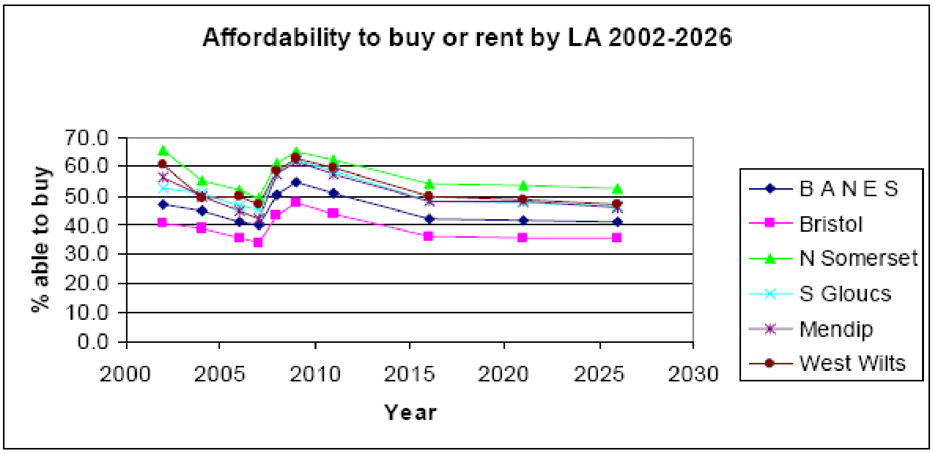
Affordability

3.4 Chapters 6 and 7 of the SHMA set out the process for calculating affordability and provide current and future estimates of affordability based on modelling. Affordability is measured by the proportions of key groups of households who can afford to rent or buy in the open market. This output forms part of the housing need calculation.

3.5 Tables 6.5 and 6.6 in the SHMA provide an historic picture of affordability across the sub-region. For Bristol it is clear that affordability has worsened in recent years dropping to a low point in 2007 where only 34% of younger households (under 35) were able to buy or rent in the market.

3.6 Figure 7.3 in the SHMA presents modelled output for affordability up to 2026 and is reproduced at Fig. 1 below. The modelling shows that affordability will improve in the short-term (to 2011) following the property price correction induced by the credit crunch. After that affordability is predicted to deteriorate up to 2016 and then maintain a stable position to 2026. The position in 2026 is shown to be virtually the same as in 2006. The average over the whole period 2006-2026 is however, better than the spot picture in 2006.

Figure. 1



Source: LA-level affordability model projections linked to higher level market forecast; % of under-35 households able to buy in the market, adjusted for wealth, or rent privately if that is more affordable.

3.7 Monitoring undertaken following publication of the SHMA[4] has shown that despite falling house prices affordability across the Housing Market Area has not improved. This is largely due to the emergence of a more restricted lending market as a result of the economic downturn.

[4] West of England Strategic Housing Market Assessment Monitoring Report – May 2010

3.8 The SHMA also models the effects of different housing supply scenarios on affordability. It is clear that increased supply reduces house prices and improves affordability. Improved affordability in turn reduces need. However, the SHMA does emphasise that supply would have to be increased across the country to achieve these positive effects. Increasing supply across the Housing Market Area alone would have much less impact and very little impact if only applied within a single local authority.

Affordable housing need

3.9 Chapter 4 of the SHMA works through the methodology for calculating housing need (following SHMA Practice Guidance[5]) and provides estimated average figures for both Bristol and the wider Housing Market Area. The basic calculation is set out at Appendix 1.

3.10 Table 4.11 in chapter 4 provides the forecast annual average net need figure for Bristol and the other Housing Market Area authorities from 2009 to 2021. A figure for the entire Housing Market Area is also provided. This table is reproduced at Table 1. below.

Table 1. Annual total housing requirements of households in need

Average 2009 - 2021	B&NES	Bristol	North Som	South Glos	Mendip	West Wilts	WoE
1)Total annual net need social rented	786	1,176	735	727	271	317	4,014
2) Total annual net need intermediate	61	351	169	176	54	69	879
3)Total annual net need	847	1,526	904	903	324	386	4,893
4) % split social rented/intermediate	93/7	77/23	81/19	80/20	83/17	82/18	82/18

3.11 The average annual net need for Bristol from 2009 is estimated to be 1,526 units, representing some 30% of the total annual need of the Housing Market Area.

Implications for policy

3.12 The SHMA acknowledges that the level of housing need identified cannot be realistically met with the levels of new housing provision planned by any of the Housing Market Area authorities. The SHMA recommended a review of delivery mechanisms for affordable housing to achieve the maximum level possible. Such a review might include:

- Reviewing affordable housing that is delivered through S106 agreements by examining site size thresholds and percentages sought. This may entail seeking an off-site contribution to affordable housing from all housing developments, whatever the site size;
- Reviewing the use of public subsidy;
- Ensuring that zones within local authorities with lower levels of need or even other local authorities with lower levels of need still deliver significant levels of affordable housing;
- Finding ways to meet needs through existing stock;

[5] Strategic Housing Market Assessments Practice Guidance – March 2007 – Department for Communities and Local Government

- Recognising that the planning system cannot be the only source of supply of new affordable housing.

3.13 The SHMA also acknowledges the limitations of policy in securing affordable housing, in particular:

- The time taken for new policies to take effect. The delivery of affordable housing will partly rely on existing planning permissions which have a previously defined quota of affordable housing (in most cases a lower percentage level than emerging policy);
- The number of sites that might come forward below the threshold where no affordable housing could be sought;
- Economic viability constraints.

3.14 The SHMA shows that even if affordable housing delivery is optimised there will be an upper practical limit to the level of affordable housing that can be delivered, even in the most pressurised areas. This upper limit will largely be determined by the economic viability of developing individual sites.

- **Household projections and economic growth forecasts**

3.15 In determining the level of local housing provision PPS3 indicates that the Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts should be taken into account.

2006-based household projections

3.16 The Government's latest published household projections for Bristol are the Department for Communities and Local Government (DCLG) 2006-based sub-regional household projections (published in March 2009). These suggest an increase of 63,000 (35.4%) households over the plan period 2006 to 2026.

3.17 Table 2 below shows a number of recent projections of household change produced by DCLG and the former Office for the Deputy Prime Minister. These are based on the corresponding demographic trend led Office for National Statistics (ONS) population projections. The household projections are highly dependent on the level and structure of population generated by the population projections. The projected level of household growth has increased substantially as population projections have also increased.

Table 2. Projections of household change in Bristol 2006-26

	Household Change 2006-26
ODPM 2003-based	29,000
DCLG Revised 2004-based	42,000
DCLG 2006-based	63,000

Source: Department for Communities and Local Government - Household estimates and projections. Crown Copyright.

3.18 The 2006-based household projections and the corresponding ONS population projections are considered to be extremely high, largely because of the assumed high levels of projected international in-migration. The population projections are discussed below.

2006-based population projections

3.19 The Office for National Statistics have produced a series of demographically-led population projections which have increased substantially with each new set of projections (see Table 3. below).

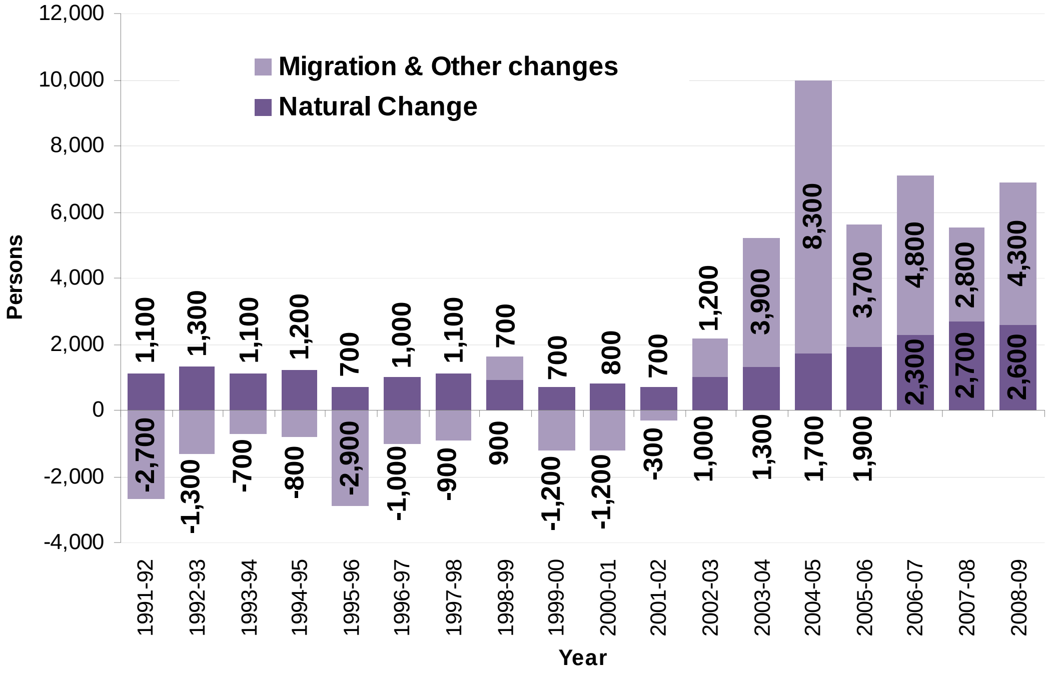
Table 3. Projections of population change in Bristol 2006-26

Projection	Population Change 2006-26
ONS 2003-based (Nov 2004)	29,500
ONS 2004-based (Oct 2006)	39,600
ONS Revised 2004-based (Sep 2007)	53,800
ONS 2006-based (Jun 2008)	109,300
ONS 2008-based (May 2010)	134,500

Sources: Office for National Statistics – Mid Year Population Estimates; Subnational Population Projections (SNPP) for England. Crown Copyright. Greater London Authority Data Management and Analysis Group.

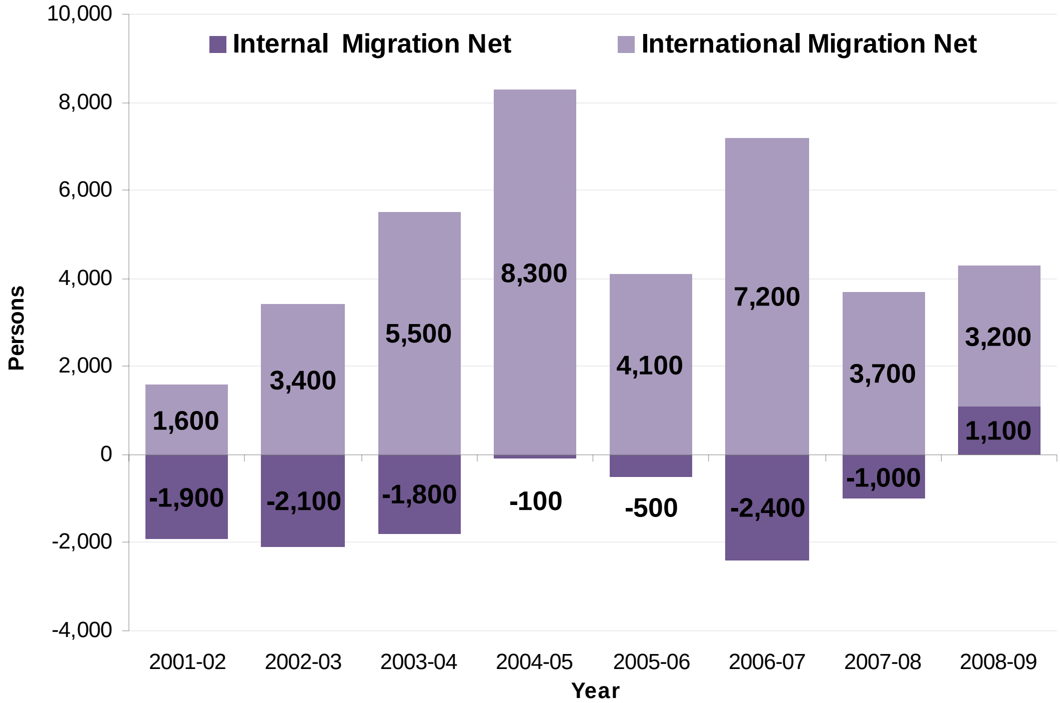
3.20 The 2006-based population projections, which underpin the 2006-based household projections, are considered to be extremely high, suggesting an increase in Bristol's population by 109,300 (26.6%) between 2006 and 2026. The projections are largely based on the demographic trends of the preceding five-year period 2001-02 to 2005-06 and take no account of dwelling supply. The components of population change in recent years are shown in Figures 2 and 3 below.

Figure 2. Components of population change in Bristol 1991 to 2009



Source: Office for National Statistics – Mid Year Population Estimates. Crown Copyright.

Figure 3. Components of migration change in Bristol 2001 to 2009



Source: Office for National Statistics – Mid Year Population Estimates. Crown Copyright.

3.21 These latest ONS projections were based on recent demographic trends generated by a unique set of circumstance which appear unlikely to be repeated within the plan period, these include: a high point in the economic cycle; high levels of international in-migration; high levels of dwelling completions; and increasing numbers of students studying in the area.

3.22 The ONS 2006-based projections are based on very high assumptions about international in-migration. The future levels of international migration are likely to be influenced by the a number of factors including:

- Lower economic growth;
- Tightening Government migration policy;
- Changing flows from areas such as the Accession (A8) countries and Somalia, which have been a significant proportion of the surge in migration since 2001; and
- Reduced Government funding for higher education.

3.23 The components of change from the ONS 2006-based population projections are set out in Table 4 below. The high level of international in-migration has implications for projected total population change, the age structure of the population and consequently the level of births.

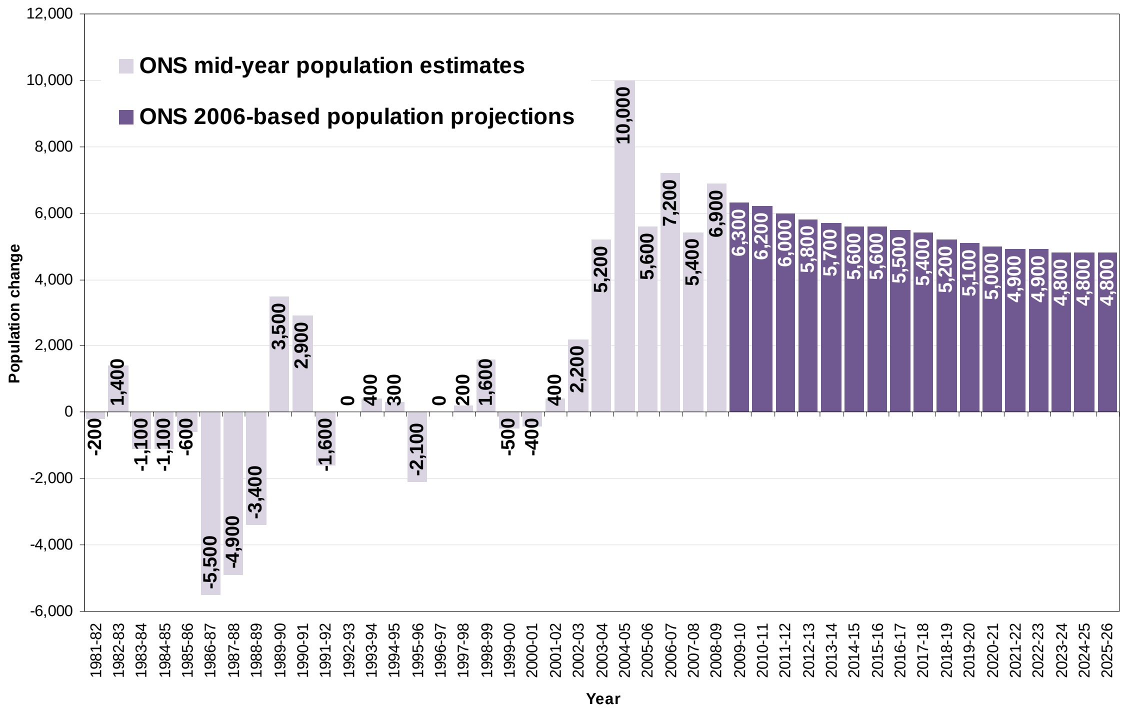
Table 4. Main components of population change in Bristol 2006-26: ONS 2006-based population projections

	Total change 2006 to 2026	Annual average change 2006 to 2026
Natural Change (Births minus Deaths)	77,400	3,900
Internal Migration and Other changes Net	-67,900	-3,400
International and Cross Border Migration Net	99,900	5,000
Total Change	109,300	5,500

Sources: Office for National Statistics – Mid Year Population Estimates; Subnational Population Projections (SNPP) for England. Crown Copyright.
Note: figures may not sum due to rounding.

3.24 Longer term population trends within Bristol have been volatile, showing cycles of decline and stability and recent growth in the population is unprecedented in recent decades. This volatility in part is due to large gross migration flows in and out of the area generating highly variable net changes in migration. The ONS projections only use a short-term trend, the preceding five-year period, and therefore do not represent the longer term migration trends. Figure 4 below contrasts the volatile nature of Bristol's annual population change in the past with the continuous high levels of change suggested by the 2006-based ONS population projections.

Figure 4. Annual population change in Bristol – ONS population estimates and projections



Sources: Office for National Statistics – Mid Year Population Estimates; Subnational Population Projections (SNPP) for England. Crown Copyright.

2008-based population and household projections

3.25 ONS published 2008-based population projections in May 2010. These suggest even higher growth in the population than the 2006-based projections, with an increase in the population of 134,500 (32.5%) between 2006 and 2026. Household projections based on the 2008-based population projections have not yet been published by CLG, however, based on Bristol City Council calculations, they are expected to show a projected increase of around 76,000 households between 2006 and 2026.

Economic growth forecasts - labour demand

3.26 Recent employment growth scenarios by Oxford Economics (June 2010) commissioned by the South West Regional Development Agency and South West Councils provide a picture of future labour demand (jobs) in Bristol which takes account of the financial crisis and recession in recent years. There are considerable uncertainties over the future economic situation which is indicated by the wide range of the potential growth from the scenarios.

3.27 Three potential scenarios have been produced by Oxford Economics:

- A baseline scenario consistent with Oxford Economics' central forecast for the UK, which envisages trend growth averaging around 2.3% a year.
- A stronger trend growth scenario more in line with pre-recession performance, consistent with trend growth for the UK of 2.75%.
- A weaker trend growth scenario based on lower immigration and lower productivity growth, showing trend output growth for the UK of 1.5% over the next decade and 1.3% over the following decade.

3.28 Cambridge Econometrics economic scenarios (November 2005) provided data down to Travel to Work Areas level and were used to support the development of the Regional Spatial Strategy. These same scenarios were re-provided using local authority geographies to support the RSS Employment Land Provision: Spatial Implications study produced by Roger Tym and Partners (August 2008). Cambridge Econometrics provided two employment growth scenarios, based on regional GVA (output) growth of 2.8% and 3.2% per year respectively 2006 to 2026.

3.29 Table 5 below shows that the latest Oxford Economics scenarios forecast an increase in jobs in Bristol of between 13,295 and 37,075 between 2006 and 2026, with a central baseline scenario increase of 21,863. This range compares with the 35,600 to 42,500 increase in jobs forecast by Cambridge Econometrics.

Table 5. Comparison of employment change scenarios for the West of England

Oxford Economics Weak 1.5-1.3% GVA

	2006	2026	2006-26	%
B&NES	92,243	95,265	3,021	3.3
BRISTOL	250,018	263,313	13,295	5.3
NSOM	84,037	97,421	13,385	15.9
SGLOS	148,246	172,120	23,873	16.1
WoE	574,545	628,119	53,574	9.3

Oxford Economics Central 2.3% GVA

	2006	2026	2006-26	%
B&NES	92,243	98,150	5,907	6.4
BRISTOL	250,018	271,881	21,863	8.7
NSOM	84,037	101,038	17,001	20.2
SGLOS	148,246	177,186	28,939	19.5
WoE	574,545	648,255	73,710	12.8

Oxford Economics Strong 2.75% GVA

	2006	2026	2006-26	%
B&NES	92,243	103,529	11,286	12.2
BRISTOL	250,018	287,093	37,075	14.8
NSOM	84,037	105,696	21,660	25.8
SGLOS	148,246	186,832	38,586	26.0
WoE	574,545	683,151	108,606	18.9

Cambridge Econometrics 2.8% GVA

	2006	2026	2006-26	%
B&NES	102,100	119,100	17,000	16.7
BRISTOL	283,400	319,000	35,600	12.6
NSOM	84,700	97,600	12,900	15.2
SGLOS	157,000	186,100	29,100	18.5
WoE	627,200	721,800	94,600	15.1

Cambridge Econometrics 3.2% GVA

	2006	2026	2006-26	%
B&NES	102,100	123,000	20,900	20.5
BRISTOL	283,400	325,900	42,500	15.0
NSOM	84,700	100,400	15,700	18.5
SGLOS	157,000	194,700	37,700	24.0
WoE	627,200	744,000	116,800	18.6

Sources: South West Observatory / Oxford Economics South West Growth Scenarios (2010-2030) (http://economy.swo.org.uk/publications/simulations-projections-and-forecasts/sw-growth-scenarios/).
Regional Assembly / Roger Tym and Partners / Cambridge Econometrics - RSS Employment Land Provision: Spatial Implications (http://www.swcouncils.gov.uk/nqcontent.cfm?a_id=4381&tt=swra)

Labour supply - Dwelling-led population projections

3.30 The West of England Partnership Office commissioned the Greater London Authority (March 2010) to produce dwelling-led population projections for Bristol based on an assumed increase of 30,226 dwellings as set out in the 2009 Strategic Housing Land Availability Assessment (SHLAA) (November 2009). These projections suggest an increase in the population of 41,032 between 2006 and 2026 and are shown in Table 6. The economically active population arising from these projections is projected to increase by 23,513. This increase in the labour supply (economically active population) broadly aligns with the increase in labour demand (jobs) of 21,863 produced by the Oxford Economics central baseline scenario of growth averaging around 2.3% a year. In comparing supply and demand, for labour account also needs to be taken of a number of factors, including job vacancies and double-jobbing (i.e. where one person holds two jobs).

Table 6. GLA dwelling led population projections for Bristol 2006-26

	2006	**2026**		**2006-26**	**%**
Population	410,487	451,519		41,032	10.0
Economically Active Population	214,588	238,102		23,513	11.0
Households	178,262	208,488		30,226	18.3

Source: Greater London Authority Data Management and Analysis Group

Demographic trend-led population projections

3.31 The economically active population arising from the ONS 2006-based projections is estimated, based on Bristol City Council calculations, to be around 70,100 people between 2006 and 2026. This level of labour supply would greatly exceed the increase in labour demand of 37,075 generated by the stronger economic scenario growth of averaging around 2.75% a year (Oxford Economics, June 2010).

- **Land availability**

3.32 PPS3 indicates that evidence of availability of suitable land for housing should be taken into account. Evidence regarding land availability has been drawn from five sources:

  - Residential Development Survey
  - An assessment of the five-year deliverable supply
  - The Strategic Housing Land Availability Assessment
  - Information on delivery from small housing sites
  - Assessments of potential capacity for development within the Green Belt

3.33 These issues have been subject to discussion in the examination hearings. Having considered the evidence of supply the Council has concluded that, having regard to national and local policy, 26,400 homes could be delivered with reasonable certainty. It has also concluded that there is potential capacity, albeit with less certain prospects for delivery, for a further 6,400 homes arising from small sites development and regeneration projects.

3.34 Following the examination hearing on 7 September the Inspector requested updated information on housing land availability. This has been included at **Appendix 3**.

- **Government's overall ambitions for affordability**

3.35 PPS3 paragraph 9 sets out the Government's strategic housing policy objectives which includes 'to improve affordability across the housing market, including by increasing the supply of housing'. In July 2010 the new Government revoked Regional Spatial Strategies which removed the region by region targets for delivery of new homes. It is understood that this means the Government no longer retains a national target for delivering 3,000,000 homes by 2020 as set out by its predecessor. The new Government has not quantified its approach to improving affordability and to increasing supply. It has, however, indicated its intention to move from the target based approach to housing delivery to an incentive based approach.

3.36 The SHMA explains that any increase in supply would have to form part of a concerted national strategy, if house prices are to be reduced and affordability improved. Such affects would be far less if higher supply levels are only applied to a single region and relatively small if only applied within a single local authority. In the circumstances, a single local planning authority can do little unilaterally to address structural affordability issues.

- **Sustainability Appraisal Information**

3.37 Paragraph 33 of PPS3 indicates that a sustainability appraisal should be taken into account in determining the level of housing provision. The Core Strategy has been subject of a sustainability appraisal process and the Publication Version was accompanied by a Sustainability Appraisal report which included consideration of Policy BCS5. An iteration of the sustainability appraisal has been prepared alongside the proposed changes to the Policy. This is included at Appendix 4.

3.38 If the Inspector considers that a set of proposed significant changes should be advertised, a full update of the Sustainability Appraisal covering all proposed significant changes to policy would be published at the same time.

- **Implications on infrastructure provision**

3.39 The Infrastructure Delivery Programme sets out the key infrastructure requirements needed to support the level of growth proposed in the Core Strategy for up to 30,000 new homes. An increase in housing beyond this figure would be unlikely to raise any significant issues of under provision in terms of infrastructure, if additional growth was dispersed throughout the city. However, any new large residential proposals would require transport modelling and other infrastructure appraisal to identify additional needs.

4. Implications of the Approach to Housing Provision

Need and Affordability

4.1 Having regard to the total potential housing supply for Bristol it is evident that the proejcted level of affordable housing need identified in the SHMA could not be realistically met. In order to meet forecast need the majority of the housing supplied would have to be affordable. This would not be economically viable or consistent with the Core Strategy's aim to deliver more mixed and balanced communities.

4.2 If the council was seeking to meet the level of need forecast by the SHMA through the application of policy BCS18 then overall housing supply levels would need to be extremely high having regard to site viability limits to the percentages sought (30%-40%). Significantly higher housing supply levels are unlikely to be deliverable even if this were considered to be an appropriate response to the SHMA forecasts.

4.3 In line with SHMA recommendations the council have sought to review delivery mechanisms for affordable housing in an effort to increase supply. This has entailed:

- Lowering the site size threshold to 15 from 25 and seeking to increase affordable housing percentages to between 30% and 40% taking account of economic viability. The average percentage secured over the last 5 years in Bristol has been approximately 18% to 20%;
- Proposals to seek financial contributions from sites under 15 units;
- Proposals to extend the use of limited public subsidy to support affordable housing percentage targets where scheme viability may be affected;
- Focusing on citywide housing need by optimising affordable housing targets across all areas;
- Seeking delivery of affordable housing through the existing housing stock, for example refurbishments and/or conversions of existing social housing and bringing empty homes back into use.

4.4 In seeking to increase levels of affordable housing, within supply constraints and policy limitations, the council has calculated the likely level of delivery to be some 8000 units over the plan period.

4.5 The SHMA and the former National Housing and Planning Advice Unit (in evidence given to Parliament) identified a number of potential broad socio-economic consequences of not being able to meet affordable housing need. These include:

- Increasing levels of overcrowding and sharing and concealed households leading to potential health and stress issues;
- Growing social housing waiting lists and housing benefit bill for households supported in the private rented sector;
- Employers finding it increasingly difficult to attract staff, particularly in lower paid roles;
- Children having to live longer with their parents

4.6 The council acknowledges that the SHMA suggests a substantial potential gap between forecast affordable housing need and potential affordable housing supply. If such a gap arises in practice this may have negative socio-economic consequences as indicated above. However, the ability of the council to substantially address this forecast shortfall and reduce the potential for consequences is limited. The evidence available suggests that supply needs to be increased at a national level to secure any structural improvements in affordability and so reduce levels of need. The Government's housing policy is still emerging and as such implications for national supply are unknown. There is clearly an upper practical limit to affordable housing delivery in the city. This is set by the total level of housing the council is able to provide for and the limitations of policy, particularly in relation to site economic viability.

4.7 The council will however, continue to seek ways to increase affordable housing by closely working with developers and local communities to find innovative solutions. Emerging Government policy may also enhance delivery. This may come through incentives to house building, in particular the 'New Homes Bonus' or through greater powers provided to local authorities and communities to deliver housing in their area.

4.8 In light of this analysis the council wishes to make a minor amendment to clarify its Vision on ‘Housing to meet local needs’ (see Schedule of Potential Minor Changes) but is satisfied that the broad Core strategy Objective of ‘Appropriate Housing Provision’ including ‘the provision of affordable homes to help meet the needs of the population in Bristol in 2026’ is consistent with the policy approach.

Economic, demographic and household change

4.9 Future changes to the population and economy are subject to significant uncertainties. Economic and population scenarios and projections show a significant range of alternative outcomes. The aspiration to deliver 30,000 additional dwellings within the city appears to broadly correspond with the Oxford Economics central baseline scenario of growth averaging around 2.3% a year. However lower or higher economic growth outcomes could have implications for jobs, population and household formation, and flows of people migrating or commuting. The social, economic and environmental implications of different scenarios will also depend on a range of sub-regional factors including the level, location, type and timing of employment change, both increases and decreases, and dwelling provision.

4.10 A level of housing supply within Bristol below the aspiration to deliver 30,000 dwellings may not provide enough homes within the city to support the central scenario of most recent projections of economic growth. Similarly continued high levels of migration or higher scenarios of economic growth which result in higher demand for housing may have negative social, economic and environmental implications, for example, increasing in-commuting into the city, and increasing levels of overcrowding, sharing and concealed households.

Bristol’s role within the sub-region

4.11 The proposed aspiration for housing delivery in Bristol, will result in the existing stock of homes within the city being increased from 180,000 to 210,000 by 2026. Based on the current populations of the other West of England authorities, and an understanding of their known aspirations for housing growth, Bristol will continue to contain 40% of West of England’s population, homes and households. The number of homes planned to be developed by 2026 will be the largest of the four West of England authorities, if the current understanding of intentions for housing delivery are reflected in the Core Strategies of all authorities.

4.12 If the economy grows at the baseline level projected by Oxford economics, Bristol is likely to see a level of new homes broadly consistent with the likely level of new economically active residents. In the event of higher levels of economic growth, there is likely to be demand for additional homes which may have implications for the housing market area if the level of homes to support the workforce exceeds the supply of land which can sustainably be delivered within the Bristol City Council boundary.

5. Conclusion

5.1 PPS3 identifies a number of considerations to be taken into account in determining the level of housing provision, including relevant local and national policies (PPS3 paragraph 32). This paper shows that a range of factors have been taken into account in determine the level of homes. The consequences and implications of the approach have been explored in this paper, to the extent that this is possible at a local level and with the evidence available.

5.2 The Council has determined that an overall aspiration of 30,000 new homes from 2006 to 2026 is appropriate for the Core Strategy. Policy BCS5 as proposed to be changed sets out how that level is likely to be achieved.

5.3 The proposed level of new homes is considered appropriate having regard to evidence of supply. It is also considered appropriate having regard to consideration of need and demand, including a balanced consideration of the latest household projections and growth forecasts. The approach is also consistent with national policy and with local policy, including the aim of maintaining the long established Green Belt.

5.4 In order to ensure that housing targets do not result in pressure for development inconsistent the spatial strategy, a minimum delivery target of 26,400 has been set for the purposes of housing supply calculations. The Council considers that the aspiration of 30,000 homes is achievable but acknowledges that the elements of supply which would contribute to achieving that higher level have less certain prospects of delivery. However, the Government has advised that it is moving from a system of imposed central targets to powerful incentives so that people can see the benefits of building[6]. A New Homes Bonus is expected to be introduced which may assist in facilitating development and alleviating obstacles to delivery. Policy BCS5's proposed minimum delivery target and higher level aspiration is considered appropriate and consistent with a locally based approach to determining the level of new homes and with the Government's forthcoming incentive based approach.

Summary of Proposed Changes to BCS5

5.5 To reflect the considerations set out in the paper it is proposed that BCS5 is amended as follows:

- Delete paragraphs referring to emerging RSS and urban extensions. Replace with context paragraphs covering planning for new homes, potential need and demand.
- In Housing Supply section add text to summarise conclusions on supply, potential for delivery from small sites and section on potential capacity of sites in Green Belt.
- Amend Table 4.5.1 to show revised figures. Add section to table to indicate potential contribution from small sites and sites in regeneration areas
- Amend policy text to refer to 30,000 aspiration and 26,400 minimum delivery target.
- Revise broad spatial distribution table:
    - Show 8,000 – 10,000 in South Bristol to reflect regeneration uncertainties
    - Revise City Centre figure to 7,400 to reflect approach to flood risk
    - Delete total from table to remove inappropriate provision – table only indicates broad spatial distribution in relation to broad strategic areas and is not intended to be mathematically or geographically precise
    - Remove data on completions and permissions for above reasons
- Remove references to contingencies
- Add explanatory paragraphs explaining aspiration and target and showing how 30,000 aspiration could be facilitated.
- Add paragraphs showing role of small sites in flexibility and confirming that no contingencies are required
- Delete explanatory paragraphs related to contingencies and urban extensions
- Add size definition of small sites in 4.5.17
- Amend delivery section:

[6] Parliamentary Statement of Secretary of State for Communities and Local Government 6 July 2010

    - to confirm regeneration sites will be allocated for housing as appropriate
    - Include approach to small sites
    - Refer to monitoring of delivery and examining evolving evidence of need and demand
- In targets and indicators section, change target to 26,400

5.6 The proposed changes from the Core Strategic Publication Version are shown at Appendix 1.

Appendix 1

Proposed Changes to Core Strategy Policy BCS5 and Chapter 5

Housing Provision

4.5.1 This policy sets out the level of new homes planned to be delivered in Bristol between 2006 and 2026. ~~A number of contingencies have also been identified to allow for possible increased numbers and to ensure a continuous supply.~~ The policy sets out a flexible approach to housing delivery.

4.5.2 Delivery will be primarily from development of homes on previously developed sites but will include the use of some open space for housing development. The policy contributes to addressing objectives 1, 2 and 4 of the Core Strategy and responds to issues 1, 5 and 11.

Context

Planning for New Homes

4.5.2A In July 2010 the Government announced the revocation and abolition of Regional Spatial Strategies which had been previously used to set housing levels in local authority areas. Local planning authorities became responsible for establishing the right level of local housing provision in their areas, and identifying a long term supply of housing land.

4.5.2B The amount of new homes for which the Core Strategy should plan has been based on assessing a range of evidence sources. Choices have then been made in response to considering that evidence.

Potential Need and Demand for New Homes

4.5.2C The main sources of evidence used to consider the potential need and demand for new homes have been the government's demographic projections, the Strategic Housing Market Assessment and projections of economic growth.

4.5.2D The Strategic Housing Market Assessment indicates that housing need in the city, that is the quantity of housing required for households who are unable to access suitable housing without financial assistance, is likely remain high in the city throughout the plan period.

4.5.2E The most recent household projections (DCLG 2009) suggest that there could be 63,000 new households created in the city up to 2026. However, these trend-based projections are based on the assumption that recent high levels of international migration will continue and they greatly exceed projections made in previous years. The Council considers that whilst it is important to have regard to this information it is questionable whether such projections are sufficiently realistic for accurately predicting the potential formation of new households in Bristol and in deciding on the number of new homes to plan for.

4.5.2F The Council has also examined predictions of future economic performance as this also has a key impact on the potential demand for new homes. In June 2010 Oxford Economics projected three potential levels of growth for the city. The central projection of 2.3% growth per annum was projected to result in employment growth of 21, 863 jobs over the plan period. The March 2010 dwelling led population projections for Bristol (GLA March 2010) indicted that there would be an increase of 23, 513 economically active people if 30,226 new homes were built in the city by 2026.

Housing Supply

4.5.3 The potential supply of housing land in Bristol has been demonstrated through ~~three~~ five main sources of evidence:

- The Residential Development Survey;
- An assessment of the five-year deliverable housing supply;
- The Strategic Housing Land Availability Assessment.
- Information on delivery from small housing sites
- Assessments of potential capacity for development of land within the Green Belt

4.5.3A The 2009 Strategic Housing Land Availability Assessment indicated a potential supply of 30,000 over the plan period. However, a number of the sites were subject to questions about their deliverability, in particular sites subject of flood risk and redevelopment of pre-cast reinforced concrete dwellings. Potential for 2,200 new homes was also estimated to arise from sites within the regeneration areas. Regeneration will result in additional homes but uncertainties about the availability of finance meant that the timing of delivery was uncertain in the financial climate of 2010. Therefore, based on the SHLAA, the Council has assessed that the level of new homes that can be delivered with reasonable certainty is about 26,400.

4.5.3B The Strategic Housing Land Availability Assessment did not consider the potential contribution that developments on small sites could make over the plan period. Although small sites cannot be identified, they have made a considerable contribution to housing delivery in the past and the Council has cautiously estimated that there is the potential for 4,200 homes to be delivered from this source over the plan period.
The potential for using land within the Green Belt for development has also been considered. The within the relatively limited areas of Green Belt within the boundaries of the city few sites have any practicable potential for development even if it was considered desirable to do so. As set out in the next policy, the Core Strategy does not propose that the boundaries of the Green Belt are changed.

4.5.4 The ~~position at the time of publication of the Core Strategy~~ housing supply position is summarised in the table below:

Table 4.5.1: 2006-26 Housing supply position at 31st March 2009

	Net dwellings
Completions 2006-09	7,037
Sites with planning permission or agreed subject s.106	12,510
Additional supply identified	~~10,453~~ 6,853
TOTAL	**26,400**
Other potential sources which could contribute to housing delivery:	
Sites in regeneration areas	2,200
Small sites	4,200

Sources: BCC Residential Development Survey 2009, SHLAA November 2009, BCC estimates of small site capacity.

~~*Emerging Regional Spatial Strategy*~~
~~4.5.5 The emerging Regional Spatial Strategy aims to establish the level of housing provision to be provided in Bristol between 2006 and 2026. The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008) suggested increasing Bristol's allocation of homes to 36,500. This figure is substantially higher than the level of 30,000 recommended by the Draft Regional Spatial Strategy for the South West Examination in Public Panel Report (December 2007).~~

~~Table 4.5.2: Emerging proposals for housing provision in Bristol (2006-26)~~

	~~Net dwellings~~
~~Draft Regional Spatial Strategy for the South West 2006-2026 (June 2006)~~	~~28,000~~
~~Core Strategy Preferred Options (January 2008)~~	~~29,500~~
~~Draft Regional Spatial Strategy for the South West Examination in Public Panel Report (December 2007)~~	~~30,000~~
~~Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008)~~	~~36,500~~

~~*Urban Extensions*~~
~~4.5.6 The emerging Regional Spatial Strategy envisages that urban extensions in the Green Belt surrounding the Bristol urban area should contribute towards providing new homes for the sub-region in the period up to 2026. The Draft Regional Spatial Strategy for the South West 2006-2026 showed 'areas of search' in the Green Belt to the southwest and southeast of Bristol to accommodate urban extensions. It set out a proposal for 1,500 homes within the city boundary as part of urban extensions to the southwest of Bristol. The draft Regional Spatial Strategy made no proposal within the city boundary for a contribution towards urban extensions to the southeast of the city.~~
~~4.5.7 The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008) reiterated the proposal for 1,500 homes inside the city boundary at southwest Bristol and added a proposal for 1,500 homes to be developed in the Green Belt inside the city boundary in southeast Bristol. The proposal in southeast Bristol was made for the first time in the Proposed Changes and had not been a recommendation of the Draft Regional Spatial Strategy for the South West Examination in Public Panel Report (December 2007).~~
~~4.5.8 The final Regional Spatial Strategy has been delayed since June 2009 following a High Court judgment that the published East of England Regional Spatial Strategy failed to meet certain requirements of the EU Strategic Environmental Assessment Directive. At the time of publication of the Core Strategy the Secretary of State is considering the potential implications for the South West Regional Spatial Strategy. In September 2009 the government decided to carry out a new sustainability appraisal, to ensure that alternatives to its proposals were properly tested. It expects the new appraisal to be completed early 2010 after which the government has said it will decide what action to take to progress the Regional Spatial Strategy.~~

Policy BCS5
~~A flexible and responsive supply of deliverable and developable land will be identified to secure the delivery of a minimum provision of~~ The Core Strategy aims to deliver new homes within the built up area to contribute towards accommodating a growing number of people and households in the city. Where this can be achieved without harm to other plan objectives and without development in the Green Belt, the Local Development Framework will aim to facilitate the development of around 30,000 new homes in Bristol between 2006 and 2026. The minimum target to be delivered will be 26,400 homes.

Provision will be in accordance with the spatial strategy for Bristol set out in this Core Strategy. Development of new homes will primarily be on previously developed sites across the city. Some new homes will be developed on open space which does not need to be retained as part of the city's green infrastructure provision.

In order to maintain the net housing stock existing homes will be retained unless they are unsuitable for residential uses, would be used for essential local community facilities or would be replaced.
The broad spatial distribution of new homes as indicated on the Key Diagram will be:

Area	Approximate net additional dwellings 2006-26	~~*Completions by 1 April 2009*~~	~~*Planning permissions at 1 April 2009*~~
South Bristol	**8,0 00 - 10,000**	~~*1,883*~~	~~*3,141*~~
City Centre	**~~9,000~~ 7,400**	~~*1,532*~~	~~*4,818*~~
Inner East	**2,000**	~~*697*~~	~~*1,033*~~
Northern Arc	**3,000**	~~*934*~~	~~*1,186*~~
Rest of Bristol	**6,000**	~~*1,991*~~	~~*2,332*~~
~~Total~~	**~~30,000~~**	~~*7,037*~~	~~*12,510*~~

~~**Contingencies**~~
~~**If monitoring shows that planned provision will not be delivered at the levels expected, or if land is required to accommodate higher levels of provision, the following contingencies for development of new homes will be considered in order of preference:**~~

1. ~~**Delivery from small sites / subdivisions;**~~
2. ~~**Mixed use development of some industrial and warehousing land; and**~~
3. ~~**Use of some Green Belt land in southeast Bristol as a long-term contingency for urban extension development. The broad location is indicated on the Key Diagram.**~~

~~**If the contingencies are required they will be brought forward in sufficient time to ensure that a continuous supply of land for new homes is maintained.**~~

Explanation

4.5.5 The Core Strategy aspires to deliver around 30,000 homes in the plan period. This level is considered to be deliverable having regard to evidence of supply. It is also an appropriate response to evidence of need and demand when projections of future households growth are balanced by consideration economic growth projections.

4.5.6 Whilst the aim is to enable the development of around 30,000 new homes, the Council is concerned to ensure that specific targets for new homes are not set at a level which could lead to pressure to develop on the Green Belt or in other locations which would conflict with the objectives of the Core Strategy. Therefore, the policy contains a minimum delivery target of 26,400 homes which is a level that can be delivered with reasonable certainty. This target figure of 26,400 will be the figure used in calculations of five year supply of land for housing.

How will the potential delivery of 30,000 homes be facilitated?

4.5.7 The minimum target of 26,400 comprises sites identified in the Strategic Housing Land Availability Assessment but does not include potential contribution to housing delivery of sites within areas of regeneration in South Bristol. However, the Council wishes to progress regeneration in that area and this could lead to provision of up to 2,200 new homes raising total delivery to around 28,600 homes. Therefore, sites with the potential for housing delivery in the regeneration areas will be identified in the Site Allocations and Development Management DPD.

4.5.8 As explained below, it is also expected that the development of small housing sites could contribute up to 4,200 new homes. The policies in the local development framework will allow for sites of fewer than 10 homes to continue to be developed throughout the city where they would deliver appropriate and sustainable forms of development.

Flexibility

4.5.9 As explained above, the Site Allocations and Development Management DPD is likely to allocate more land for development than is necessary to secure the target figure of 26,400 new homes. The likely contribution of homes from small sites over the plan period also provides some flexibility in the reaching the minimum target. Although the Strategic Housing Land Availability Assessment does not include an allowance for homes being delivered from small sites, the Council estimates that up to 4,200 could arise from this source. This potential source of new homes has two roles. It will assist in securing the aspiration figure of 30,000 homes. It also offers flexibility in the event that some larger sites fail to come forward as expected.

4.5.10 The combination of the existing stock of permissions, overall allocated supply and the potential contribution from small sites means that the target minimum of 26,400 should be deliverable with reasonable certainty. Therefore, no further contingencies in the event of undersupply are required in this strategy.

~~In the absence of the Regional Spatial Strategy and having regard to the potential concerns regarding aspects of its legality, the Core Strategy has been progressed with a minimum level of provision of 30,000 homes with contingencies for additional homes. The figure of 30,000 homes is consistent with the level explored in the Core Strategy Preferred Options (January 2008) and with the overall level recommended in the Draft Regional Spatial Strategy for the South West Examination in Public Panel Report (December 2007). It is also consistent with level of additional capacity identified in the Strategic Housing Land Availability Assessment.~~

~~*Approach to Urban Extensions*~~

~~4.5.10 Various urban extension areas of search have been proposed in the emerging Regional Spatial Strategy with the majority of urban extension development proposed within the administrative areas of adjoining authorities. Proposals for urban extensions within the city boundary have performed consistently poorly in the sustainability appraisal process of the Core Strategy. Due to significant development constraints it has been determined that there is only minimal potential capacity for the delivery of homes in the Green Belt in southwest Bristol. Land in southeast Bristol is also subject to development constraints and there are major challenges to developing a sustainable urban extension in this location.~~

~~4.5.11 The evidence that housing delivery can be secured from other sources, together with the practical constraints on development in the Green Belt areas, has led to the Core Strategy making no current proposals for urban extensions in the Green Belt within Bristol. However, the possibility of urban extension development in southeast Bristol is retained as a long-term contingency.~~

~~*Contingencies*~~

~~4.5.12 The contingencies referred to in this policy were all explored in the Core Strategy Preferred Options Review (February 2009). The Monitoring and Review section of this strategy shows the approach to contingencies and identifies the triggers which would result in them being considered as part of housing delivery.~~

~~4.5.13 **Small sites** - the most sustainable approach to additional supply was found to be delivery of homes from small sites making efficient use of land. Such sites, providing fewer than 10 homes, are too small to be allocated and their availability cannot be gauged with certainty over the long term. However, based on previous patterns of delivery and the likelihood of small sites continuing to become available for development across the city, it is estimated that 4,500 homes could arise from this source. Their overall contribution would not be relied on as a source of supply until 2021 at the earliest. Their actual contribution to housing supply will be measured through annual monitoring.~~

~~4.5.14 **Industrial and warehousing land** - the use of some primarily industrial and warehousing land has clear implications for the economic objectives of the Core Strategy. However, the Core Strategy Preferred Options Review (February 2009) explored the potential for such land to contribute up to 1,700 homes. If it is necessary to use such sites the following criteria will be used to identify suitable sites to be allocated through the development plan process:~~

- ~~The area's suitability for housing and / or mixed-use development.~~
- ~~Attractiveness of the area for industrial and warehousing businesses as evidenced by vacancy levels, age and quality of buildings, parking, internal circulation and servicing, ease of access to the main road network, adjacent land uses which may constrain operations, market demand for industrial and warehousing development, topography, size, shape and access.~~
- ~~Socio-economic factors including socio-economic deprivation in the local area, availability of other industrial and warehousing land locally, and local regeneration initiatives and designations.~~

~~4.5.15 **Urban extension in southeast Bristol –** land at southeast Bristol could act as a long term contingency for future supply of homes. Such capacity is unlikely to exceed 1,500 homes and is not expected to be subject to consideration until at least 2021.~~

~~4.5.16 Evidence shows that there is minimal feasible capacity for development of new homes on Green Belt land in southwest Bristol. This potential capacity is noted but is too limited to be identified as a meaningful contingency for future supply.~~

Housing figures

4.5.17 All housing figures in this policy refer to **net additional completions,** that is the total number of completions minus those lost through demolition and conversions. Small housing sites are defined as being those of 9 dwellings or fewer.

Policy Delivery

Delivery of homes will primarily be by the private sector with a proportion developed by Registered Social Landlords. The council will also facilitate delivery of homes working with its partner organisations, particularly in areas of change and regeneration, and where appropriate will support other mechanisms including self-building and community land trusts.

Further information on delivering the housing provision is set out in the delivery sections of other Core Strategy policies.

A trajectory showing the projected pattern of delivery of new homes up to 2026 is included as Diagram 4.5.1. The estimates of delivery have had regard to the impact of the major infrastructure required to support housing development.

Delivery of the homes will be in part from land with existing planning permission. At the time of publication of the Core Strategy 7,037 have already been completed to contribute to delivery from 2006 to 2026 and there were 12,510 homes contained within planning permissions.

Additional developable sites for housing (including mixed-use developments) will be allocated in both the proposed Site Allocations & Development Management DPD and Bristol Central Area Action Plan. This will include appropriate sites within the regeneration areas.

Where proposals are in accordance with other policies in the Core Strategy and other development plan documents, the potential contribution of small housing sites to overall housing delivery will be a material consideration in decisions on planning applications.

The Strategic Housing Land Availability Assessment will set out the deliverable and developable supply of housing land to ensure a continuous supply of deliverable sites. The policy will be monitored and reviewed through annual Residential Development Surveys, Annual Monitoring Reports, regularly updated Strategic Housing Land Availability Assessments and deliverable housing supply surveys.

Understanding of population and household change, economic growth and housing need is likely to change over time. This means that the level of homes to be planned will need to be reviewed. The approach to policy review~~, include trigger mechanisms,~~ is set out in the Monitoring and Review section of this strategy.~~ If it is necessary to use contingency sources of supply to maintain delivery, as identified through monitoring, additional sites will be identified in a revised Site Allocations & Development Management DPD and the Bristol Central Area Action Plan.~~ In accordance with a plan, monitor and manage approach to the provision of new homes, the Council will continue to monitor the delivery of new homes and examine evolving evidence of need and demand. It will review the evidence and consider the appropriate response in consultation with other local authorities and stakeholders.

The approach to affordable housing and housing type is set out in BCS17 and BCS18.

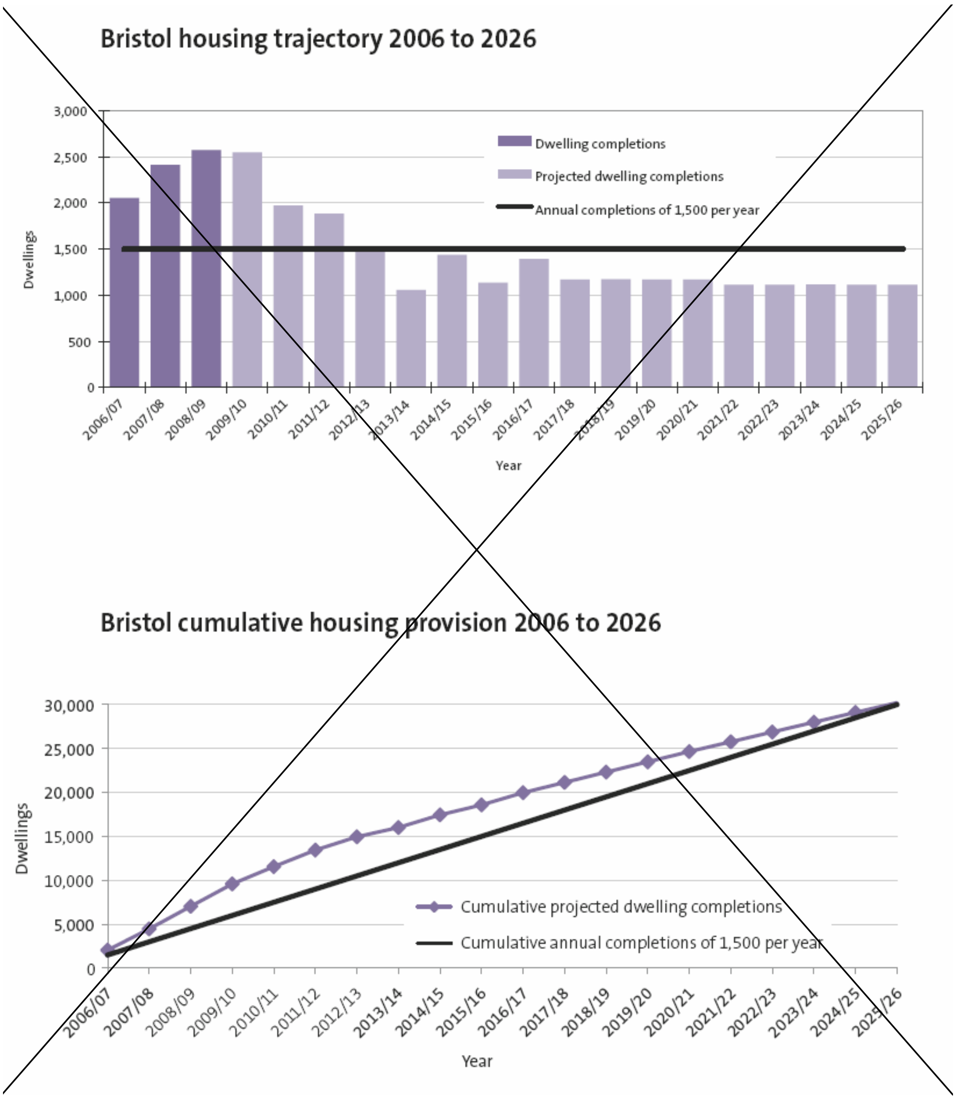
Targets	Indicators
Provision of ~~a minimum of~~ 26,400 ~~30,000~~ net additional homes between 2006 and 2026.	Net additional homes provided (National Indicator 154) The target will be monitored through annual Residential Development Surveys and reported in Annual Monitoring Reports.
Maintain a 5 year supply of deliverable housing sites throughout plan period.	Supply of ready to develop housing sites (National Indicator 159) The target will be monitored through annual deliverable housing supply surveys and reported in Annual Monitoring Reports.
	The Targets and Indicators section of BCS8 addresses the economic aspects of this policy
	The Targets and Indicators section of BCS10 addresses the transport aspects of this policy

Consequential Changes to Other Policies:

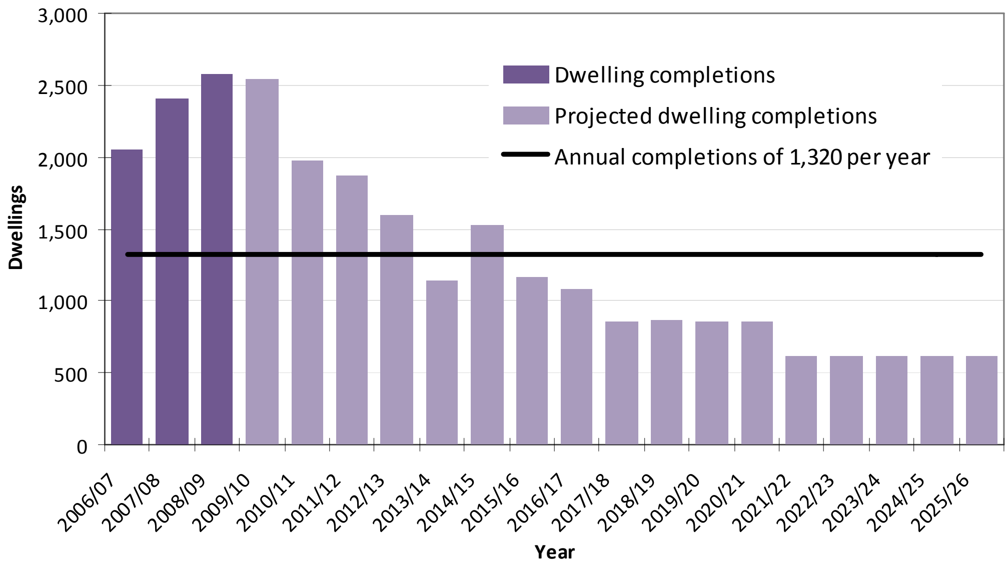
Policy BCS1 – change housing figure to refer to 8,000 – 10,000 homes.

Policy BCS2 – change housing figure to refer to 7,400 homes in policy and explanatory text.

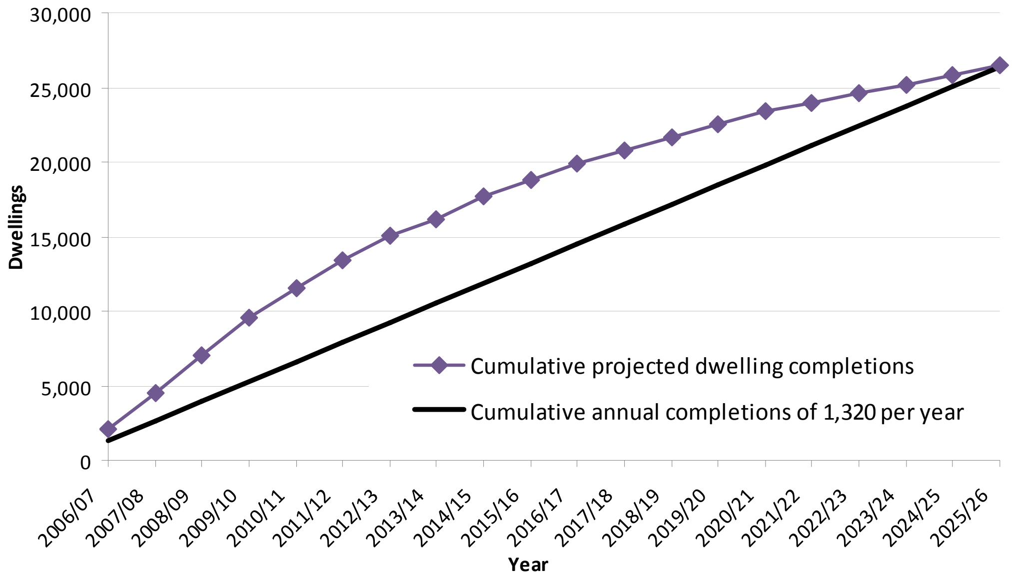
Diagram 4.5.1: Trajectory ~~fpr~~ for delivery of new homes up to 2026



Bristol housing trajectory 2006 to 2026



Bristol cumulative housing provision 2006 to 2026



5. Monitoring and Review

5.1 The principal means for monitoring the Core Strategy will be the Annual Monitoring Report which is published each year in December. This will monitor wider social, environmental and economic issues, together with key drivers of spatial change and implementation of the Core Strategy policies. The Annual Monitoring Report will also provide commentary on how policies are being delivered. In future the Annual Monitoring Report will also help to identify whether policies need to be to be amended or replaced.

5.2 Each section of the Core Strategy establishes selected indicators for monitoring the policies. Targets have also been set where these would assist delivering the objectives of the Core Strategy.

5.3 It is intended that in addition to the monitoring set out in the Annual Monitoring Report a five-yearly cycle of more comprehensive monitoring and review of the Core Strategy is established with an interim review date of 2016 and a major review date of 2021. Review processes would commence at least two years in advance of the review date in order to allow any new policies to be adopted in a timely manner.

5.4 The Core Strategy sets out various standards to be achieved by specified times in the future. Over time some approaches may need to be changed in response to new evidence or evolving circumstances. For example, approaches to climate change policies may be affected by changing technologies which could mean that in future higher standards of environmental performance can be achieved than can currently be envisaged. Therefore, partial reviews of the Core Strategy may be carried out from time to time in response to such emerging issues.

~~Housing delivery contingencies~~

~~5.5 Housing provision 0 establishes a number of contingencies to allow for possible increased housing provision numbers or to ensure a continuous housing land supply. Table 5.1 identifies the planned contingencies for development of new homes, the associated triggers and the delivery mechanisms which will be put into place when the trigger point is reached. These planned contingencies will be considered in order of preference.~~

~~Table 5.1: Contingencies, triggers and delivery mechanisms~~

~~Contingency~~	~~Triggers~~	~~Delivery mechanisms~~
~~1. Delivery from small sites / sub-divisions~~	~~Unable to demonstrate five year deliverable housing land supply in AMR or higher housing provision than 30,000 set out in final Regional Spatial Strategy.~~	~~The delivery of small sites and subdivisions cannot be relied upon as a planned source of delivery until after 2021 to comply with PPS3 'Housing'. However, their actual contribution to housing supply will be assessed through annual monitoring.~~
~~2. Mixed use elopment of some industrial and warehousing land~~	~~Unable to demonstrate five year deliverable housing land supply in AMR or higher housing provision than 30,000 set out in final RSS.~~	~~Study to identify suitable sites assessing suitability, attractiveness, and socio-economic factors leading to additional sites being identified in a revised Site Allocations &~~

		~~Development Management DPD and the Bristol Central Area Action Plan.~~
~~3. Use of some Green Belt land in southeast Bristol as a long-term contingency as part of a planned urban extension.~~	~~Higher housing provision than 30,000 set out in final Regional Spatial Strategy, including identification of land in southeast Bristol.~~ ~~It is not anticipated that any development of this land would be required before 2021.~~	~~Green Belt review study leading to the identification of additional sites in a revised Sites Allocations & Development Management DPD.~~

Appendix 2

SHMA - Summary of need calculation

Net backlog need – 10% per annum comprising:

Backlog of need for social rented housing

PLUS

Backlog of need for intermediate housing

MINUS

Committed new supply of rented and intermediate housing

PLUS

Annual average newly arising need comprising:

Newly forming households in need of social rented housing or able to afford intermediate housing

PLUS

In-migrants unable to afford to buy or rent in market

PLUS

Existing owner occupiers falling into need

LESS

Annual supply comprising:

Supply of social relets

PLUS

Additional re-lets arising from tenants moving into intermediate housing

PLUS

Supply of re-sales from intermediate stock

EQUALS

Net annual need for:

Affordable rented and affordable intermediate homes

Appendix 3

Details of housing supply: 2009 Strategic Housing Land Assessment with discounts

	A	*B*	*C*	*D*	*E*	*F*	*G*	*H*	*I*	*J*
	Completions 2006-09	**Commitments 2009**	**2009 SHLAA Sites**	**Original Total (A+B+C)**	**Flood Risk Discount**	**Pre-Cast Reinforced Concrete Discount**	**Regeneration Discount**	**Total Discount (E+F+G)**	**2009 SHLAA Sites Discounted (C-H)**	**Discounted Total (A+B+I)**
South Bristol	1,883	2,493	6,337	10,713	-115		-2,245	-2,360	3,977	8,353
City Centre	1,532	4,540	2,219	8,291	-868			-868	1,351	7,423
Inner City / East	697	1,168	158	2,023				0	158	2,023
Northern Arc	934	1,186	1,694	3,814	-201	-341		-542	1,152	3,272
Rest of Bristol	1,991	2,310	1,084	5,385	-15			-15	1,069	5,370
TOTAL	7,037	11,697	11,492	**30,226**	-1,199	-341	-2,245	-3,785	7,707	**26,441**

Details of housing supply: Site Allocations Options Consultation Illustrative Capacity with discounts

	Original Total		Flood Risk Discount	Pre-Cast Reinforced Concrete Discount	Regeneration Discount	Total Discount		Discounted Total
SA&DM Illustrative Capacity	7,440		-591			-591		6,849
Regeneration Sites	2,245				-2,245	-2,245		0
Pre-Cast Reinforced Concrete	341			-341		-341		0
Central Area Action Plan	2,393		-868			-868		1,525
Completions 2006-09	7,037							7,037
Commitments 2009	11,697							11,697
TOTAL	**31,153**		-1,459	-341	-2,245	-4,045		**27,108**

Appendix 4

CORE STRATEGY PROPOSED SIGNIFICANT CHANGES – OCTOBER 2010

SUSTAINABILTIY APPRAISAL OF SIGNIFICANT CHANGES TO BCS5

The following appraisal matrix explains how the significant changes, from Publication to Proposed Significant Changes version of the Core Strategy, have impacted the sustainability of the policy. The appraisal matrix only displays those sustainability objectives where the effect has altered, in nature of extent, due to significant changes in the policy.

	Key questions are: Would the approach lead to…				
Objective 2 Support communities that meet people's needs	Key questions are: Would the approach lead to…	***Publication Core Strategy – SA effect***	***Housing Provision Appraisal***	*Proposed Significant Changes Core Strategy – SA Effect*	
To make suitable housing available and affordable for everyone.	…an increase in the number of homes of the type required to meet need, particularly more affordable homes?	***(++)***	*Significant positive effects are appraised as the policy provides the necessary housing for the growing Population, a minimum of 26,400 is considered to be deliverable with certainty, but it is considered possible to plan for 30,000 new dwellings.* *The minimum number of dwellings proposed by BCS 5 in the Proposed Significant Changes Core Strategy is reduced in comparison to the Publication Version, 26,400 in comparison to 30,000. It is still considered possible to aspire to 30,000 new dwellings, but the actual delivery of the additional 3600 dwellings becomes dependent on issues of implementation and regeneration funding associated with areas of South Bristol – as set out in section 4.5.11 of the policy.*	**(++)**	**(I)**

				In comparison to the baseline position, information on housing demand set out in section 4.5.2B of BSC5 and potential reliance on existing policy, planning for strategic allocation of 26,400, is considered to have significant positive effect on this objective. As however, the supply of 30,000 dwelling is dependent upon issues of implementation, the extent of significance positive effect from BCS5 becomes more dependent upon implementation. **Change nature of effect from Significant positive to significant positive and implementation dependent.**		
Objective 3 Develop the economy in ways that meet people's needs	Key questions are: Would the approach lead to…	***Publication Core Strategy – SA effect***		***Housing Provision Appraisal***	*Proposed Significant Changes Core Strategy – SA Effect*	
To give everyone in the city satisfying opportunities for work.	… the availability of employment locally that suits the needs of the local population?	***(+)***	***(I)***	*The numbers of new homes set out in the policy will assist in providing the population to support local and larger business and regeneration, particularly in areas suffering from deprivation and a lack of services and facilities.* *The Publication Core Strategy contained contingencies which had potential for some industrial and warehousing land to be utilised in the longer term as a source of additional housing land. If implemented this might have had an adverse impact on local opportunities for certain types of employment in some areas.* *However, BCS 5 in the Proposed Significant Changes Core Strategy no longer contains provision for any contingencies, including potential development of industrial and warehousing land. As such the potential for loss of employment opportunities in the longer term, to supply housing, is unlikely to arise enhancing the certainty that only positive effects will occur on this objective.* **The nature of effect is considered to change from implementation and positive to**	**(+)**	

				only positive		
Objective 5 Maintain and improve environmental quality and assets.	Key questions are: Would the approach lead to…	***Publication Core Strategy – SA effect***		***Housing Provision Appraisal***	*Proposed Significant Changes Core Strategy – SA Effect*	
To promote the conservation and wise use of land.	…encouragement of development of previously developed land rather than greenfield sites where possible and promotion of higher densities in accessible locations?	***(+)***	***(I)***	*The majority of development within the Core Strategy will be on previously developed land. However, the strategy allows for use of some green field land in certain circumstances, through development on lower value open spaces. The exact number and location of open spaces proposed for development will be set out in the Site Allocations.* *The policy text of BCS5, the section on contingencies and 4.5.15 of the supporting text in the Publication version Core Strategy, also contained contingencies for urban extensions. This might have led to development of green belt land around the city in the longer term and created potential for negative effects on this objective, dependent upon implementation.* *Whilst there is still potential for some Greenfield site development through lower value open space for housing, BCS 5 no longer contains contingencies for development on the Green Belt. The deletion of contingencies from the Policy text and explicit supporting text within the policy and at 4.5.9 is considered to remove some of the potential negative effects on this objective.* *With the majority of development proposed on previously developed land advocated by BCS5 the policy is considered to be generally positive in nature* *There remains, dependent upon the amount of lower value open space implemented for development in the site allocations, potential for negative effects to occur. But there potential extent and significance of negative effects are reduced by changes to*	**(+)**	**(I)**

				the policy. **No change but reduced potential and extent for negative occurring should be recognised.**		
To reduce vulnerability to flooding and sea level rise.	...development and infrastructure which is not at risk from flooding?	*(I)*		*BCS5 in the Proposed Significant Changes Core Strategy is explicit in directing the supply of strategic housing delivery away from high flood risk areas – set out at 3.5.9. This is considered to have generally positive effects on the objective.* *The changes to BCS5, set out at 3.5.9 differ from the approach taken in the Publication version of the Core Strategy, where some housing was still considered acceptable in flood risk areas, as long as mitigation could be incorporated. This was considered to leave to implementation, potential negative effects, and generally introduced uncertainty as to the overall effect of strategic housing delivery and policy on flood risk. This uncertainty and implementation dependent effect is no longer considered to exist following changes to BCS5.* *Where residual concerns remain and potential exists for development outside the flood risk areas to cause overland flow or displace water into flood risk areas, it is considered that implementation of Policy BCS16 'Flood Risk' will ensure that measures to mitigate and reduce flood risk will be incorporated into new development.* **The nature of effect is considered to change from implementation dependent to positive.**	**(+)**	