

Bristol Local Plan Examination

Matter 2: Housing Need, Requirement and
Supply

STATEMENT ON BEHALF OF HALLAM LAND MANAGEMENT, WILSON

ENTERPRISES AND PARKER STRATEGIC LAND REF. 257

February 2025

Issue 2.1: Whether the Plan establishes a housing requirement figure that is positively prepared, justified and consistent with national policy (Policy H1)

Q2.7: Should the Plan set out the scale of unmet housing need and set out how the issue is expected to be addressed, including the role of other local authorities?

1. Yes
2. For the Plan to be found sound, it is critical that the matter of unmet needs is robustly dealt with. Paragraph 35c of the September 2023 version¹ of the National Planning Policy Framework (“the Framework”) requires that Local Plans are, inter alia:

“based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred”

3. As demonstrated within our Regulation 19 representations in relation to Policy H1, the Plan (and specifically Policy H1) does not provide a framework for unmet needs (the principle cross-boundary strategic matter for Local Plan) to be accommodated. This matter must be addressed if the Plan is to be found sound.
4. Our Matter 1 Statement considers Bristol City Council’s approach to liaising with its neighbouring authorities with respect to unmet needs. These discussions have been fundamentally flawed by Bristol City Council not identifying the full extent of its unmet needs.
5. The reasoning for Bristol City Council not accurately identifying its unmet needs is set out within our Regulation 19 representations²; in summary, it is derived from the Council challenging its minimum Local Housing Need as identified via the Standard Method by claiming that the 2014 household projections were not appropriate and that the 35% uplift required for Bristol by the previous Standard Method should not be applied as the housing requirement for Bristol is higher than most of the other major urban centres. As demonstrated within our Regulation 19 representations³, these reasons do not constitute an exceptional circumstance to justify deviating from the Standard Method in calculating the minimum Local Housing Need figure in accordance with paragraph 61 of the September 2023 version of the Framework.

¹ The version that the Plan is to be assessed against in accordance with paragraph 230 of the December 2023 version of the Framework

² Notably paragraph 13

³ Paragraphs 14-29

6. Accordingly, Bristol City Council's approach to establishing the extent of its unmet needs has been flawed from the fundamental calculation of its housing requirement.
7. In the context of calculating the minimum Local Housing Need, it is notable that the Government published a new Standard Method in December 2024, which is the basis for calculating the minimum housing requirement for emerging Local Plans that have not yet been submitted for examination⁴. This moves away from the previous household projection approach to a stock-based approach. The new Standard Method identifies a minimum Local Housing Need of 2,986 dwellings per annum, which whilst below the minimum Local Housing Need derived by the Standard Method at the time that the Plan was submitted for Examination⁵ is still substantially higher than the housing requirement identified by the Plan⁶.
8. Whilst the new Standard Method figure is not relevant to the Examination of the Plan, it is a material consideration that demonstrates that the Council's approach in establishing its housing requirement is clearly flawed.
9. If the Plan is to appropriately address its unmet needs, it must first recognise its minimum Local Housing Need. Following this, it should identify the residual housing requirement having regard to the full extent of deliverable supply within its administrative boundaries – i.e. the full extent of unmet needs. This would provide a robust position to engage with the neighbouring authorities to explore the potential to accommodate the unmet needs through their respective Local Plans.
10. To ensure that there is a clear framework for unmet needs to be delivered, the extent of unmet needs must be clearly set out within a policy that includes an approach for the unmet needs to be delivered with a review mechanism. Policy H1 fails to make such provisions.
11. We have suggested a policy framework to replace Policy H1 within our Regulation 19 representations to Policy H1⁷ to enable the approach to the unmet needs to accord with the requirements of paragraph 35c of the September 2023 version of the Framework, which is based on a policy from the Birmingham Local Plan. For ease of reference, this is repeated below:
 - Housing requirement – the minimum Local Housing Need derived from the Standard Method
 - Capacity within Bristol City Council's administrative boundaries
 - Shortfall against the minimum Local Housing Need – i.e. the unmet need
 - Approach to delivering unmet needs through liaison with the neighbouring authorities
 - Review mechanism.

⁴ Having regard to the transitional measures under paragraph 234 of the December 2024 version of the Framework

⁵ In accordance with the Planning Practice Guidance – paragraph ref. ID: 2a-008-20241212

⁶ Set out by Policy H1 of the Plan

⁷ Paragraph 71



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