
Bristol Local Plan Examination –
Hearing Statement
**Matter 2: Housing Need,
Requirement and Supply**

On behalf of Crest Nicolson

February 2025

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Matter 2: Housing Need, Requirement and Supply

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

Q2.1: Is the objectively assessed housing need (OAHN) for Bristol of 3,380 dwellings per annum (60,840 during the plan period) based on an approach consistent with paragraph 61 of the NPPF?

Q2.2: Given the Council's response to PQ64 and PQ65, what relevance does the 2022 ORS Local Housing Need Report appended to document TPC0049 have for the issue of establishing the objectively assessed housing need?

- 1.1** We welcome the Council's recognition in paragraph 6.4 of the draft Local Plan (CSD001) that the starting point for calculating housing need is the 'Standard Method'. We also support the position set out in Paragraph 6.4 that the urban uplift of 35% should be applied to the calculation of housing need in Bristol and therefore that a housing need of 3,380 homes a year is indicated as the local housing need for Bristol.
- 1.2** We have commented further on the calculation of housing need in our representations to the Regulation 19 Local Plan consultation.
- 1.3** We note that in the response to the Inspector's Preliminary Question 64, the Council again accepts that Bristol's housing need calculated using the Standard Method stands at 3,380 homes per year.
- 1.4** In response to the Inspectors' Preliminary Question 65, the Council is also clear that in assessing housing need for Bristol the Council has not diverged from the Standard Method.
- 1.5** We have commented at length in our representations on the analysis set out in the Local Housing Need Assessment produced by ORS (EVEH03), which was produced in November 2023 and therefore seems to update the LHNR appended to TPC004 referred to in Q2.2 above. We maintain the points set out in our representations but given that Council's statements in paragraph 6.4 of the Local Plan and in response to PQ64 and PQ65, we believe that the OAHN for Bristol of 3,380 homes per year is consistent with the December 2023 version of the NPPF, and therefore we believe that both EVEH03 and the appendix to TPC004 have no relevance to the issue of establishing Bristol's housing need. For the avoidance of doubt, for the purposes of the Examination into the Bristol Local Plan the OAHN for Bristol appears to have been accepted to stand at 3,380 homes per year, and therefore 60,840 homes in total to be delivered over the plan period.
- 1.6** Nevertheless, we have outstanding concerns regarding the way in which the Local Plan deals with Bristol's unmet need, and also whether the plan is flexible enough to set the context for dealing with unmet need

in the context of the revised NPPF which was published in December 2024. Our further comments are therefore concerned with:

- The presentation of Bristol’s unmet need for new homes,
- The implications of the revised NPPF 2024.

Bristol’s Unmet Housing Need

- 1.7** We have set out in our Matter 1 Hearing Statement our concerns over the effectiveness of the Duty to Cooperate in terms of Bristol’s request to neighbouring authorities to assist in accommodating the city’s unmet need for new homes. We have also set out in our representations in response to the Regulation 19 Local Plan consultation why it is of critical importance to the residents and businesses of Bristol, and of the wider Bristol urban area, that all of the West of England Combined Authority Councils and North Somerset Council face up to housing need across the whole area through their plan making responsibilities. Bristol’s unmet need must be addressed to ensure that there is adequate accommodation to serve the needs of current and future residents of the wider area.
- 1.8** The Bristol Local Plan is therefore of critical importance. The matter of the level of unmet housing need arising in Bristol has been a matter that has failed to be addressed through the Joint Spatial Plan 2017, and the West of England Spatial Development Strategy in 2022. Despite repeated attempts, the local authorities have been unable to agree to assist Bristol in accommodating unmet need, with the result that over the past 8 years at least (since the work on the Joint Spatial Plan 2017), the need has not been met.
- 1.9** The Bristol Local Plan is the first plan in the West of England area (including North Somerset) to be Examined in this context. The Bristol Local Plan therefore represents the opportunity to set out clearly, for the first time in the development plan, the level of unmet need to be addressed across the wider area. Doing so would not only provide a clear planning framework for the City Council to use to guide development within the city, but would also crystallise the requirement for the neighbouring local authorities to plan to accommodate Bristol’s unmet need for homes. This point is emphasised by the implications of the revised NPPF published in December 2024, which we set out below.
- 1.10** The Bristol Local Plan acknowledges that the OAHN arising in Bristol is 3,380 homes a year. Policy H1 then sets out that the Local Plan housing requirement will be a minimum of 1,925 homes per year. We have not objected to this assessment of the number of homes that the City Council believes can be delivered in Bristol over the plan period.
- 1.11** Our concern is that although the Local Plan sets out the OAHN, and the housing requirement, it does not clearly set out a requirement that unmet needs should be accommodated by neighbouring authorities.

The unmet need is implicit in the housing policies but is not clearly set out. Paragraph 35 c) of the December 2023 NPPF sets out that for plans to be effective, they should be “based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred”. Clearly, the Bristol Local Plan cannot set out the level of Bristol’s unmet need that should be accommodated by neighbouring authorities without an agreement on this matter being reached. We have commented on this point in our Matter 1 Hearing Statement. Nevertheless, for the Bristol Local Plan to be effective, it should set out clearly the unmet needs to be accommodated by the adjacent authorities. By setting a strategy for Bristol’s housing needs to be met, the Local Plan would be ensuring that a mechanism is in place for accommodating Bristol’s housing needs and would be creating a policy framework against which the Local Plans of the neighbouring authorities should be examined. Without such a policy, there is no certainty that Bristol’s housing needs will be met in full.

Implications of the revised NPPF 2024

1.12 It is acknowledged that under the transition arrangements set out in the revised NPPF published on 12th December 2024, the Bristol Local Plan is being Examined under the previous version of the Framework published in December 2023.

1.13 On the matter of Bristol’s unmet need for new homes it is clear that North Somerset and B&NES will be producing Local Plans which will be examined under the December 2024 Framework, and although South Gloucestershire may also benefit from transition arrangements, the South Gloucestershire Local Plan will certainly see the matter of Bristol’s unmet need being discussed at the Local Plan Examination. Those plan making processes will benefit from a clear and unequivocal position being set in the Bristol Local Plan, creating certainty around the challenges to be faced up to.

1.14 In terms of the revised NPPF published in December 2024, it is also clear that the matter of housing targets to be accommodated by Local Plans has changed:

- Paragraph 62 of the new NPPF is now clear that housing targets should be informed by the Standard Method as set out in NPPG, and that there is no longer any provision for local authorities to use a different method of calculating housing need.
- Paragraph 62 also sets out clearly that “In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”
- Paragraph 27 of the new NPPF sets out that In particular their plans should ensure that:... b) unmet development needs from neighbouring areas are provided for in accordance with paragraph 11b.

- Finally, the housing targets for local authorities derived from the new Standard Method confirm that Bristol’s housing target has reduced from 3,308 homes per year to 2,986 homes per year. Although Bristol’s need has therefore reduced, it is clearly still significantly greater than the housing requirement set out in the draft Local Plan.
- It is also noted that the Council’s responses to PQ64 and PQ65 recognise that the revised NPPF will contain new housing targets, and that the new target for Bristol will be lower than that calculated by the previous standard methodology.

1.15 The revised NPPF is therefore setting a position whereby local authority housing targets must be accommodated within Local Plans, and where neighbouring authorities must accommodate the needs of neighbouring authorities. Therefore, in order to be found sound the Local Plans of at least two of Bristol’s neighbouring authorities must set out how they are addressing Bristol’s unmet needs, and it would also seem clear that South Gloucestershire’s Local Plan will be Examined in the light of Bristol demonstrating an unmet need.

1.16 Given the fact that Bristol’s housing need has changed under the revised NPPF, in order to provide a clear position to guide plan making in the neighbouring authorities, the Bristol Local Plan needs to set out a flexible approach which nevertheless makes it clear that there is an expectation that the neighbouring local authorities will accommodate elements of the city’s unmet need. The Bristol Local Plan makes clear in Policy H1 that it can accommodate a minimum of 1,925 homes a year – and this figure will become the starting point for understanding the City’s unmet need if it is confirmed by the Examination into Bristol’s Local Plan.

1.17 We have set out our concerns that the Local Plan as currently drafted does not set out a clear framework by which the plans of neighbouring authorities can be assessed, to test whether they are effectively accommodating an element of Bristol’s unmet need for new homes. In our representations to the Regulation 19 consultation on the Bristol Local Plan, we set out suggested amendments to the Local Plan to address these concerns. Given that the revised NPPF has been published since we made these suggestions, we set out below a revised set of changes which we believe would achieve the aim of creating a simple framework for neighbouring Local Plans to follow, and would also have enough flexibility to apply to the December 2024 NPPF. Our suggested changes to the Local Plan are as follows:

1.18 We would suggest that paragraph 6.4 of the Bristol Local Plan Publication Version is amended as follows:

“The starting point to determine need is ~~currently~~ the government’s ‘standard method’ which is set out in the National Planning Practice Guidance. ~~This is a national approach which uses a standard formula based on 2014 based household projections, an affordability adjustment, a capping mechanism and then~~

a 35% uplift directed to 20 identified urban authorities of which Bristol is one. The figure derived from this method can change on an annual basis but currently indicates a housing need of 3,380 per year.

- 1.19 We would suggest that paragraph 6.5 of the Bristol Local Plan Publication Version is **deleted**, and a new paragraph 6.5 is added setting out:

“At the time that the Bristol Local Plan was produced, the Standard Methodology indicates a housing need of 3,308 new homes per year, leading to a need for 60,840 new homes to be delivered between 2022 and 2040.”

- 1.20 We then suggest that the following alterations are made to paragraph 6.8 of the Bristol Local Plan Publication Version:

“The above assessment shows that although part of the assessed need for new homes can be met within Bristol, the evidence indicates additional homes will need to be delivered by Bristol’s neighbouring authorities elsewhere to ensure that the city’s need for new homes does not go unmet. A minimum of 1,925 new homes a year will be delivered in Bristol, ensuring that at least 34,650 new homes will be delivered in the city over the plan period. On the basis of Bristol’s housing need of 3,308 homes per year as set out in paragraph 6.5, there will be an unmet need for 26,190 homes to be delivered by the surrounding local authorities. This level of unmet need should be monitored by Bristol’s neighbouring local authorities to ensure that their Local Plans are addressing the most up to date assessment of the unmet need for new homes. In addition, Bristol City Council has worked will continue to work with the neighbouring councils of North Somerset, South Gloucestershire and Bath & North East Somerset to agree how the City’s unmet need for new homes will consider whether and to what extent those needs could be met in those areas. The local plans for those areas will set out how Bristol’s unmet need will be met address the approach to any unmet needs which they are able to accommodate.”

- 1.21 Finally, we suggest that Policy H1 should be amended to set out clearly Bristol’s local housing need and the extent of the unmet need that has been identified – to ensure that finding solutions to meeting needs in full is given the appropriate weight. We suggest that Policy H1 should read:

“Bristol’s local housing need is currently a minimum of 3,380 new homes to be delivered over the plan period 2022 – 2040. The Bristol Local Plan will deliver an annual average minimum of 1,925 new homes will be delivered over the plan period to 2040, leaving an unmet need of 1,455 new homes a year. The aspiration is that the Bristol Local Plan housing requirement this figure will be exceeded where this can be supported by service and infrastructure capacity. The Local Plans of neighbouring authorities will address to what extent the unmet need of 1,455 new homes, or a more up to date assessment of Bristol’s unmet need based on the Standard Methodology, can be accommodated in their plan areas.”



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