

North Somerset Core Strategy: examination of remitted policies

North Somerset Council's proposed position in respect of the examination of remitted policies.

Statement for consultation

November 2013

CONTENTS

Summary of the Council's position

A. Introduction

B. Policy context

C. Core Strategy examination, adoption and challenge

D. Re-assessment of the housing requirement

E. Proposed revised housing requirement

F. Proposed amendments to the remitted policies

Appendices

Appendix A: Proposed changes to text of remitted policies

Appendix B: Testing the impact of the proposed and alternative dwelling figures on overall sustainability objectives

Summary of the Council's position

- i) There remains a clear policy objective as set out in the extant Core Strategy policies of addressing North Somerset's unsustainable development legacy and improving self-containment through the employment-led approach. The employment-led approach focussed at Weston-super-Mare is starting to gain some traction but needs time to ensure that development patterns in the future will be much more sustainable.
- ii) At the time of the original Core Strategy a traditional 'predict and provide' methodology to derive the housing requirement would have simply perpetuated existing unsustainable trends. In addition, uncertainty over the robustness and reliability of traditional trend-based projections meant that a different approach was needed which would improve the balance between houses and jobs, and provide a more robust assessment of future housing requirements.
- iii) In order to address these issues an alternative approach was adopted which focussed on the relationship between homes and jobs. The existence of more robust data now allows a transition to more conventional methods whilst maintaining the integrity of the original aspirations and in conformity with government guidance.
- iv) An up-to-date objectively assessed housing needs assessment has been prepared. This equates to a recommended dwelling requirement of 17,130 – 20,220 dwellings over the plan period.
- v) The Council has assessed the new evidence in terms of its relationship with the original methodology, and consistency with the Core Strategy objectives.
- vi) Any increase in the dwelling requirement from 14,000 will dilute the employment-led approach. Analysis of the headline self-containment percentage but also the homes/jobs and commuting ratios indicates that 17,130 dwellings can be supported without fundamentally affecting the extant approach. 17,130 dwellings will result in self-containment falling from a projected 76% to 74% in 2026.
- vii) 17,130 dwellings will significantly boost supply by 22% and provides additional scope to meet the needs of non-economic households ('latent demand').
- viii) 17,130 dwellings can be delivered in accordance with the existing spatial strategy as demonstrated by the Consultation Draft Sites and Policies Plan and the 2013 SHLAA. There is therefore no need to amend the other remitted policies.
- ix) Work has commenced on the review of the West of England SHMA in co-operation with neighbouring authorities. If evidence suggests that additional strategic provision is required then this will be determined on a West of England-wide basis through the duty to co-operate. This may necessitate a future review of the spatial strategy.

A. Introduction

1. On 12 November 2013 North Somerset Council agreed its proposed approach in respect of the examination of remitted Core Strategy policies. This recommended that Policy CS13: Scale of new housing is amended as follows:

Original text

A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 14,000 dwellings within North Somerset 2006–2026.

The appropriate level of new homes will be reviewed in 2016 and 2021.

Proposed text

A supply of deliverable and developable land will be identified to secure the delivery of 17,130 dwellings within North Somerset 2006-2026.

The full proposed amended text to Policy CS13 and its supporting justification as well as the other remitted policies as a consequence of this change is set out at Appendix A.

2. This paper sets out the background, context and evidence relating to the Council's recommended approach, and comments are invited from interested parties during the consultation period. The Inspector appointed to undertake the examination of remitted policies has indicated (RED/01) that the consultation should enable 'interested parties to make representations in respect of the changed NPPF guidance, the changed strategic context arising from the revocation of the RS, up-to-date population forecasts and any other relevant changes to the evidence base'. All representations received will be considered by the Council as well as being made available to the Inspector appointed to undertake the examination.
3. The Core Strategy has been through a lengthy process of plan preparation, examination, adoption and legal challenge and there exists a substantial amount of evidence/information in the public domain much of which remains relevant to the examination of the remitted policies. This paper aims to provide a readable and easily understood narrative but given the complexity of the Core Strategy process, this will not cover all aspects and some elements must be taken as read. Key documents are referenced in this paper (with Core Strategy examination reference numbers as appropriate) but this is not necessarily comprehensive and other documents/evidence may be referred to during the course of the examination.

4. The focus of this paper is on the remitted policies, particularly Policy CS13, but to do this involves a certain amount of scene setting to explain the Council's approach. The paper is therefore divided into the following sections:
 - Policy context
The current policy context as set out in extant policies and national guidance
 - Core Strategy examination, adoption and challenge.
Plan progress to date, highlighting critical issues.
 - Re-assessment of the housing requirement.
The up-to-date evidence.
 - Proposed revised housing requirement
Explanation of the recommended approach
 - Proposed amendments to the remitted policies
5. The Inspector appointed to undertake the examination of remitted policies has indicated that in the first instance only Policy CS13 will be re-examined with any consequential effect on Policies CS6, CS14, CS19, CS28 and CS30-33 being examined at a later date should this be necessary (RED/03).

B. Policy context

Core Strategy context

6. Following completion of the plan making process, the North Somerset Core Strategy was submitted to the Planning Inspectorate for examination on 8 July 2011. The plan then entered the examination phase and hearings took place between 23 November and 14 December 2011. The Inspector's Report was dated 15 March 2012 and the Core Strategy was adopted on 10 April 2012.
7. The Core Strategy was subject to legal challenge which resulted in Policy CS13 (Scale of new housing) being remitted back to the Planning Inspectorate for re-examination. In addition, eight further policies were also remitted on the grounds that if the housing requirement was amended then this could have a knock-on effect on other policies:
8. The Core Strategy remains an adopted development plan with the exception of the remitted policies which, apart from CS13, were only remitted because of the potential consequences of amending the housing requirement. The extant policies, which include the employment-led approach and affordable housing, ensure that the plan's strategic framework and objectives are retained over the plan period.

Plan period

9. The Core Strategy has a plan period of 2006-2026. It is not proposed that the examination of the remitted policies should extend this period despite only 13 years remaining as the extant policies in the plan were evidenced and found sound on the basis of the 2006-2026 timeframe. Extending the plan period in relation to the housing requirement would be inconsistent and potentially in conflict with the remainder of the extant policies.

Employment-led

10. The Core Strategy has a clear employment-led development emphasis. This is a long standing spatial policy objective which was set out in RPG10, draft RSS, Joint Replacement Structure Plan and the Replacement Local Plan all of which sought to provide for more sustainable development patterns by improving self-containment and reducing out-commuting. This approach was continued in the Core Strategy as articulated, for example, in the vision for Weston-super-Mare and also the supporting text to Policy CS13:

Core Strategy Weston-super-Mare Vision (Vision 2)

"By 2026 an employment-led development strategy will have achieved a strong and diverse economic profile in Weston-super-Mare with an improved range, quantity and quality of local employment opportunities which address the imbalance between employment and homes reducing dependency on out-commuting by car for work and improving self containment and sustainable living".

Supporting text to Policy CS13 (paragraph 3.182)

“North Somerset has experienced relatively high levels of housing demand but low levels of economic growth. It is pressure from the more economically buoyant parts of the sub-region, particularly Bristol and Bath, coupled with relatively low house prices which are the major determining factors driving housing growth pressures, and contributing to relatively low job growth and high levels of out-commuting. The Core Strategy approach is to ensure that housing growth is much more closely linked to employment growth (employment led) than in the past and that housing supply is better managed in order to provide sufficient housing to meet locally arising needs without attracting inappropriate levels of in-migration”.

11. Core Strategy Policy CS20 remains an extant adopted policy and sets out the strategic approach to employment-led development. This policy must be accorded substantial weight in the re-examination of the remitted policies and is an important factor to be taken into account in respect of the latent demand issue highlighted by the Judge. The key elements of Policy CS20 are summarised as follows:

- Provision of at least 10,100 additional jobs 2006-2026 including around 114ha of employment land.
- Overall approach is employment-led in order to achieve a more sustainable alignment between jobs and the economically active population across towns and villages in North Somerset. This seeks to increase their sustainability, self containment, decrease out-commuting, provide for a range of local jobs and reduce carbon emissions from unsustainable car use.
- The focus of employment development will be at Weston-super-Mare primarily through town centre and gateway regeneration and the new development at Weston Villages, where new residential development will be provided in step with employment opportunities and with an emphasis on new B1(a) office employment.
- Throughout Weston-super-Mare proposals should provide for 1.5 jobs per home over the plan period both at Weston Villages and elsewhere on sites of 10 or more dwellings. The type of employment should be acceptable in planning terms and not detrimental to the overall employment strategy in the town.
- Outside of the Weston Villages and allocated sites, if on-site provision is not suitable, financial contributions will be sought towards economic development through the use of planning obligations.
- Within Clevedon, Nailsea and Portishead new employment development will be supported primarily on allocated land with a key objective of improving self containment, and reducing out-commuting.
- Elsewhere, economic activity appropriate to the scale of the settlement will be approved within settlement boundaries where this leads to greater self containment, is compatible with the character of the area and meets locally identified needs.

12. The supporting text to Policy CS20 sets out the background to the adopted policy:

“Economic development is a high priority for North Somerset as it has suffered from low levels of economic activity in recent years compared to high levels of residential development. This has led to high levels of out-commuting, and unsustainable development and a key objective of the Core Strategy is to address this trend.” (Paragraph 3.248).

“There is a general strategic policy aspiration to ensure that all new development is sustainable and contributes to reducing the existing problems of out-commuting, lack of local employment opportunities and associated problems such as congestion and deprivation. The Core Strategy seeks to better align job growth with residential development.” (Paragraph 3.250).

13. The key indicator measuring the success of the employment-led objective is the delivery of a significant improvement in self-containment within North Somerset. Over the plan period self-containment is anticipated to rise from 65% in 2006 to 76% in 2026 based on 14,000 dwellings and 10,100 dwellings. The impact of increasing the housing requirement on the effectiveness of the employment-led approach and the consequential reduction in self-containment is considered elsewhere in this paper.

Housing

14. Core Strategy Policy CS13 states that:

A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 14,000 dwellings within North Somerset 2006-2026. The appropriate level of new homes will be reviewed in 2016 and 2021.

The High Court Judgment did not find the housing requirement of a minimum of 14,000 dwellings unlawful, but that the Inspector had failed to give adequate or intelligible reasons. The Inspector had recommended that the number be a minimum, but at the same time had identified flexibility and contingency in the land supply as demonstrated by the SHLAA, and the need for review.

15. Housing growth over the plan period is to be focussed on Weston-super-Mare through the strategic allocations at Weston Villages. Development at the strategic sites is being delivered in accordance with the employment-led and regeneration objectives as set out in Core Strategy Policies CS20 and CS30, co-ordinated through the Weston Villages SPD, and where residential development is directly linked to the delivery of jobs.
16. Significant transport and drainage infrastructure is either under construction or planned at Weston Villages and the first phases of housing and employment development are underway or with detailed permission, and with major planning applications in the pipeline. The principles contained in the Joint Position Statement (ED/25) which set

out the joint delivery actions agreed between the Weston Villages landowners/developers to secure enhanced employment provision in step with housing delivery are being implemented in accordance with Policies CS20, CS30 and the Weston Villages SPD. This is complemented by the designation, marketing and promotion of M5 J21 Enterprise Area and the Weston Package transport improvements.

Policy context for the re-examination of remitted policies

17. The Regional Strategy (RPG10) (2001) and the Joint Replacement Structure Plan (2002) were revoked on 20 May 2013. The draft RSS (2008) never proceeded to adoption and had been effectively abandoned prior to the original submission of the Core Strategy.
18. The NPPF came into force in March 2012, just before adoption of the Core Strategy on 10 April. The examination process had taken into account the draft NPPF and this is referenced in the Inspector's Report. A separate report on the implications of the new NPPF was taken into account as part of the Council's formal decision to adopt.
19. The NPPF's overarching principle is the achievement of sustainable development, and in particular to balance the economic, social and environmental dimensions. "Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas" (paragraph 10). Paragraph 14 is highlighted in the NPPF and sets out the government's approach:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- *Local planning authorities should positively seek opportunities to meet the development needs of their area:*
- *Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted."*

The NPPF confirms that the government continues to attach great importance to Green Belts.

20. When examining local plans the NPPF provides guidance on the test of soundness (paragraph 182). Plans should be positively prepared, justified, effective and consistent with national policy. In terms of the

re-examination of the remitted policies, the advice is clear that to be found sound any revised housing requirement must be deliverable over the plan period and any revisions to the spatial strategy consistent with delivering the principles of sustainable development as set out in the NPPF.

21. NPPF advice on the calculation of the housing requirement is set out at paragraph 47:

“To boost significantly the supply of housing, local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the market area, as far is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period”.*

The government emphasis is on increasing housing supply, but delivery needs to be consistent with the sustainable development principles contained elsewhere in the NPPF and the advice on plan-making such as contained at paragraph 14. In the North Somerset Core Strategy context this is primarily reflected in the extant employment-led and regeneration objectives of the plan.

22. At paragraph 159 the NPPF provides guidance on using a proportionate evidence base for housing:

“Local planning authorities should have a clear understanding of housing needs in their area. They should:

- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
 - meets household and population projections, taking account of migration and demographic change;*
 - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
 - caters for housing demand and the scale of housing supply necessary to meet this demand;*
- prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability*

and the likely economic viability of land to meet the identified need for housing over the plan period.”

Strategic Housing Market Assessment (SHMA)

23. The West of England SHMA (2009) was prepared jointly by the six authorities who comprise the West of England Housing Market Area. This was accepted as an important component of the evidence base at the original Core Strategy examination. This remains the current SHMA for the process of the re-assessment of remitted policies. This is appropriate given that the policies in question have simply been remitted back to the examination phase as opposed to starting the plan from scratch.
24. Nevertheless, work has commenced on the review of the West of England SHMA but the findings are not going to be available to inform the examination of remitted policies. This involves joint working between North Somerset, Bristol City, South Gloucestershire and Bath and NE Somerset, as well as Mendip, Sedgemoor and Wiltshire. A governance structure and timetable has been established. The published programme indicates that given the need to incorporate key data sets from the 2011 Census related to job numbers and travel to work data, the final outputs are not anticipated until early 2015. If the evidence suggests that additional housing provision is required then the appropriate response will be determined on a West of England basis through the duty to co-operate. If this results in additional strategic provision being required in North Somerset then this may necessitate a Core Strategy review.
25. The fact that the SHMA review is not going to be available should not be an obstacle to progress. Inspectors elsewhere such as at the Milton Keynes Core Strategy (Inspector's Report May 2013) have taken a pragmatic approach such as in that case by supporting an interim housing requirement pending an early review that will address needs in co-operation with adjoining authorities.
26. The South Gloucestershire Core Strategy Inspector (Inspector's Report November 2013) concluded that any deficiencies in the evidence base will be resolved through the revised SHMA and that “in these circumstances it would not be justified to delay this plan until the new SHMA is completed” (paragraph 84). In paragraph 86 he recommends that a review/replacement plan is in place by the end of 2018. “This would allow the Council sufficient time to take into account the implications of the SHMA, to assess its housing land supply position and the success of new neighbourhoods in meeting housing needs. In addition, it would enable the Council to re-examine strategic development options, including any adjustments which may be required to Green Belt boundaries”. In paragraph 87 he states that “the outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates

such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.”

27. While the original North Somerset Policy CS13 included the statement that “the appropriate level of new homes will be reviewed in 2016 and 2021”, it is not recommended that this is retained in the policy wording. This was introduced given uncertainties over the robustness of the trend-based projections at the time and given the more recent work on updating the housing requirement there is now more certainty in terms of the objectively assessed housing needs over the plan period than at the time of the original examination. However, the Council is committed to the West of England SHMA process and working jointly with neighbouring authorities on the implications for housing supply across the sub-region and, where necessary, reviewing the Core Strategy position.

Strategic Housing Land Availability Assessment (SHLAA)

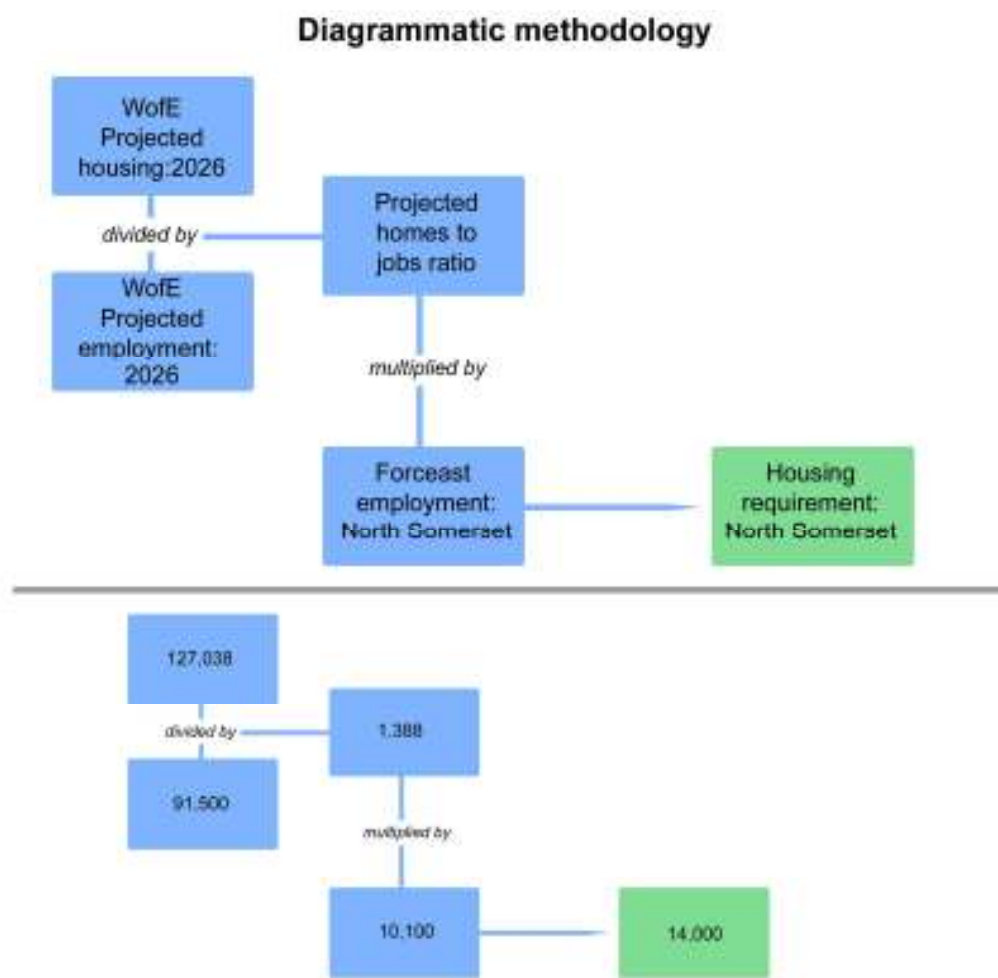
28. The North Somerset Strategic Housing Land Availability Assessment (SHLAA) assesses potential sources of housing supply (including availability) to demonstrate the deliverability of the Core Strategy requirement. The 2011 document included a schedule of potential sites (most of which were submitted by landowners) that were assessed as broadly in accordance with the spatial strategy, and were illustrative of the type of opportunities that may be considered for allocation through the Sites and Policies Plan. The 2011 SHLAA demonstrated that there is flexibility in delivering the Core Strategy supported by a total potential supply of 17,171 dwellings over the plan period
29. The SHLAA has been updated to an April 2013 base date. Since preparation of the 2011 SHLAA and approval of NPPF, some changes have been made in terms of how the assessment is undertaken. So, as well as updating the evidence base, the latest SHLAA now includes a windfall element for the first five years and a figure for anticipated completions at broad locations 2018-2026. The 2013 SHLAA identifies a potential supply of 19,854 dwellings over the plan period.

C. Core Strategy examination, adoption and challenge

Introduction to the original housing requirement methodology

30. The starting point for any assessment of the housing requirement is a traditional analysis of trend-based population and household projections. Where predictions based on past performance are shown to be robust and likely to be appropriate and deliverable going forward taking account of sustainable development objectives then these can be used for plan making with some confidence.
31. However, in an area such as North Somerset where there was identified a significant existing imbalance between homes and jobs, the continuation of inappropriate trends would simply serve to further exacerbate the area's inherent unsustainability. At the time of Core Strategy preparation a methodology was needed which better reflected the spatial objectives.
32. The North Somerset methodology is set out in the 'North Somerset Council: Determining a locally derived district Core Strategy housing requirement to 2026' Stage 1 and Stage 2 (2010, amended 2011) (SD/19 and ED/15). At the time this document was produced the national economy had entered recession and the trend-based data from the previous years of strong economic growth and record levels of housebuilding was no longer reliable as a robust estimate of what might happen in the future.
33. Instead of relying on a simplistic 'predict and provide' approach, the methodology used sought to better encapsulate the interrelationships between housing need and demand, and economic growth across the wider housing market area. This was particularly relevant for North Somerset where long-standing strategic spatial objectives emphasised the need for better self-containment, reducing out-commuting and achieving an essential balance between jobs and homes growth (see adopted policy CS20). The methodology therefore sought to break away from historic unsustainable trend of high housing and low employment growth in North Somerset in order to plan for more sustainable growth in accordance with national and local policy objectives.
34. At the heart of the methodology is a relationship between projected housing and jobs. This relationship needs to be assessed at an appropriate larger geography. For North Somerset the wider West of England was used as the frame of reference as at this sub-regional geography the overall patterns of, for example, jobs, commuting and migration are more representative of the overall balance. Once an appropriate relationship had been identified at the larger geography, then North Somerset employment projections were used to identify a sustainable level of housing growth.

35. The methodology is summarised in the following diagram:



Summarising the key stages

Step 1: Identify the housing projection

Based on population and household projections for the West of England over the plan period taking account of natural change, migration and household formation rates. The household forecast is converted to a dwelling requirement.

Step 2: Identify the employment projection

Based on forecasts for jobs growth derived from econometric modelling for the West of England over the plan period.

Step 3: Calculate a homes to jobs ratio

The ratio captures the relationship between projected homes and projected jobs over the plan period.

Step 4: Identify the forecast employment figure

This is the most appropriate jobs target for North Somerset over the plan period taking account of wider policy objectives and deliverability issues.

Step 5: Calculate the housing requirement

Calculation to derive a dwelling requirement for North Somerset over the plan period.

Summary of the original Core Strategy methodology

36. Population and household projections are trend-based. They provide an informed guess as to what is likely to happen in the future on the basis of what has happened in the past, assuming past policy constraints were applied in the future. They are driven by assumptions about future rates of natural change (births and deaths), net migration and household formation behaviour. While the projections form the starting point for the assessment of the housing requirement, they reflect recent trends, including migration patterns and the impact of previous planning policies, and must therefore be carefully interpreted to ensure that the implications are fully understood. They should not be taken at face value.
37. At the time of the 2010 study, the most recently published projections were the ONS 2008 revised population estimates and the 2006 household projections. (The 2008 projections were not published until after the study was completed but they were included and commented upon as part of the October 2011 amendments). These were based on data from a sustained period of strong growth, historically high levels of housebuilding and high levels of in-migration. Unsurprisingly, this produced high projections over the plan period which was clearly at odds with the current state of the economy and prospects for recovery and growth. Looking back, it is clear that the uncritical application of the 2008 revised estimates would have had significant adverse consequences for North Somerset.
38. The general instability of the 2008 series was identified as a particular problem in deriving a robust and realistic future dwelling requirement. Although it related to a previous period, the 2004 series was identified as being a better indication of future circumstances as the trend data it was based on reflected a more average, less extreme period of economic growth where net migration in particular was less volatile. Therefore the 2004 based population projections were used as a basis in Step 1 for identifying the dwelling requirements.
39. The conversion of households to dwellings is calculated by multiplying by a factor of about 1.03, which allows for factors such as second homes and vacancy rates.
40. The conclusion was that the use of what is in effect a 'predict and provide' approach was not a robust sustainable approach and would not be based on reliable trend data. Given the combination of low rates of job growth and relatively lower house prices compared to elsewhere in the West of England, the potential demand for housing in North Somerset from the wider sub-region is very strong. The study concluded that pacing the rate of housing growth locally so as not to greatly outstrip the overall relative growth across the West of England is probably the only practical solution. There was therefore a desire to break away from historic trends in housing and employment growth in North Somerset.

41. There are adverse consequences related to both the under-provision and over-provision of housing. The Core Strategy approach sought to steer a middle path between simply limiting new housing to house employees in new jobs projected in the local economy, which could lead to potential employees not being able to complete in the housing market, and following market demand, which could encourage large numbers of non-economically active migrants.
42. The solution was to relate historic trends in the relationship between the economically active and non-active occupiers of new housing to economic growth levels. This would mean that any fall in future employment prospects would result in a matching reduction in provision for non-economically active migrants. In this way these non-economically active migrants would not be any worse off than before (ie compared with the pre-recession trend), but at the same time would not benefit from any lack of competition for homes as a result of lower (post recession) rates of job growth.
43. In order to establish a level of growth which is sustainable but at the same time is realistic about the way the housing market operates, the following principles were identified:
- a) Help ensure a healthy economy by closely linking housing growth to employment (employment-led growth).
 - b) Provide sufficient housing to meet needs arising locally – allowing for a stretching, but achievable target for affordable housing.
 - c) Accept that market forces will permit movement and freedom of choice for those with the financial resources – non-economically active migrants will continue to move into the area.
 - d) Identify and test alternative housing levels to establish which options can be built within acceptable environmental limits.
44. Four options scenarios were identified for testing:
- A. Housing growth meets alternative projected local economic growth levels.
 - B. As above but also with an allowance for the pre-existing housing backlog identified by SHMA.
 - C. Housing growth meets recent trend population (migration) growth requirements.
 - D. Housing growth meets all SHMA affordable housing requirements by 2026.
- A housing provision level was identified for each of these scenarios and then tested to see how far each of them satisfies the principles set out above.
45. The economic scenarios used in the study were the Oxford Economics growth scenarios (June 2010). This provided information for both North Somerset and the West of England area. The Oxford Economics figures were presented as a central forecast, as well as a stronger

trend and a weaker trend growth. The study assessed these growth scenarios and identified that the projections appeared to suggest surprisingly high levels of relative growth within the North Somerset sectors. This was adjusted using West of England average levels of growth per existing job to arrive at a modified projection.

46. Based on the modified Oxford central forecast, the projected job growth for North Somerset for 2006-2026 was 10,100 jobs. This was the recommended level of jobs to plan for within the district over the plan period. The 'direct estimate' method was used to identify the most likely range of the local economy's labour force requirements. This generated a district housing requirement figure of 14,000 dwellings.
47. The conclusions at each step in the 2011 study are summarised below:

North Somerset methodology 2011	
Step 1: Identify the housing projection	
Revised 2004 trend based dwelling requirement for West of England 2006-2026	127,038 dwellings
Step 2: Identify the employment projection	
2008 Cambridge Econometrics (CE) GVA and job projections for the West of England 2006-2026	91,500 jobs
Step 3: Calculate a homes to jobs ratio	
127,038 dwellings /91,500 jobs	1.388
Step 4: Identify the forecast employment figure	
Modified Oxford Economics central forecast projection for North Somerset 2006-2026	10,100 jobs
Step 5: Calculate the housing requirement	
10,100 jobs x 1.388	14,000 dwellings

48. In order to calculate the housing requirement for scenario A, the assessment identified the likely net growth in jobs over the plan period which it assessed to be 10,100. It then calculated a homes/jobs ratio to apply to that figure. This was ascertained by calculating the private household population projection for the West of England to 2026 and applying an average household size for the West of England to identify the future dwellings that would be required for that population projection. The ONS revised 2004 data was used for this purpose. A ratio between the total additional homes in the West of England and the total additional jobs in the West of England was then established which was 1.388. This ratio was then applied to the number of jobs reasonably expected in North Somerset for the plan period of 10,100 to give a housing requirement of 14,000.

49. This was then further tested by using the North Somerset trend household share of the West of England jobs. This gave a higher ratio between homes and jobs and a therefore a greater requirement for housing but of course replicated the existing unsatisfactory out commuting pressures from North Somerset as a result of the lack of jobs in relation to houses.
50. The 1.388 ratio approach reflected a relationship between the additional dwellings required to support the ascertained increase in jobs created whilst making allowance for some non job related migration and population and household growth. An assessment was undertaken of the housing figures produced in the four scenarios taking account of the four guiding principles.

Inspector's Report

51. The Inspector's Report of 15 March 2012 identified eight main issues upon which the soundness of the plan depended. Of these, Issue 1 is directly related to the re-assessment of Policy CS13 while Issue 2 will be of relevance to the consideration of the other remitted policies should the housing requirement be increased.
52. Issue 1: whether the Core Strategy makes appropriate provision for overall amounts of employment and housing development.
The Inspector concluded (paragraphs 29-35) that given the economic context and the removal of regional targets "there is no evident single right answer to the question of how many jobs and homes the Core Strategy should provide for at this time". A policy judgement needed to be made and he considered that North Somerset had provided sound evidence to support the Core Strategy position. The Inspector recognised that flexibility in supply was needed given uncertain economic conditions, and concluded that the SHLAA had demonstrated "a significant measure of flexibility". However it was also recognised that a substantial upturn in the economy could in the future trigger a comprehensive review of the spatial strategy within the West of England, and therefore there was a need for 5 yearly review of the plan. "Meanwhile, it is appropriate that this expressly employment-led Core Strategy be given a chance to succeed, where previous plans have failed, in the sustainable co-location of new employment and housing in accordance with the essential established principles of the draft RSS and RPG10".
53. Issue 2: Whether the Core Strategy sets out an appropriate overall spatial strategy for the distribution of development.
The Inspector concluded that "the Core Strategy sets out an appropriate, justifiable and effective overall spatial strategy for North Somerset" although this will need to be subject to the review process. He noted in particular that "the co-location of employment and housing is necessary to reduce out-commuting via the M5 to Bristol. In particular, if Policies CS20 and CS30 were ineffective in delivering their full complement of housing linked to 1.5 jobs per new dwelling in the

Weston Villages, there would be far-reaching implications for the success of the spatial strategy as a whole”.

Legal challenge

54. The University of Bristol (promoting land in the Green Belt for housing) challenged the adoption of the Core Strategy on three grounds, all related to what they considered to be defects in the Inspector’s Report:

Ground 1: Failure to comply with its duty to co-operate and adopting the failure of the Inspector who concluded that the duty to co-operate did not apply.

Ground 2: Relying upon an unsound evidence base in the calculation of numerical housing requirements and adopting the Inspector’s failure to provide adequate reasons as to why the council’s evidence was to be preferred over the Claimant’s evidence.

Ground 3: Failure to ensure conformity with RPG10 and adopting the Inspector’s failure in respect of the same.

55. The Judgment is dated 14 February 2013. The main findings are summarised as follows:

Ground 1: Failure to apply the duty to co-operate. Challenge failed.

The duty to co-operate was not introduced until after the Core Strategy was submitted for examination and therefore the Inspector was right that he did not have to consider the duty retrospectively.

Ground 2: Reliance on an unsound evidence base in the calculation of the housing requirement and the Inspector’s failure to provide adequate reasons why the Council’s evidence was preferred. Challenge succeeded in part.

The Inspector gave clear reasons for rejecting the draft RSS housing requirement of 26,750 dwellings and concluding there should be a fresh appraisal of housing need. He explained his reasoning in respect of the use of household forecasts. However he failed to give ‘adequate or intelligible reasons’ for his conclusion that the Council’s housing target of 14,000 dwellings made sufficient allowance for latent demand (ie demand unrelated to the creation of new jobs).

Ground 3: Failure to ensure conformity with RPG10 in respect of a need for Green Belt review. Challenge failed.

The Inspector was entitled to conclude that there was sufficient housing land supply, there was no need for an urban extension to meet the housing needs of Bristol and therefore a Green Belt review was not required.

Remitted policies

56. The Core Strategy remains an adopted document. However, Policy CS13 (housing requirement) was found to be unlawful given that its adoption was as a consequence of the Inspector's recommendation. The Judge indicated that if the housing requirement was amended then it could have a knock on effect on other policies.

"It is possible that an alternative housing requirement figure for North Somerset excluding an urban extension may necessitate the release of land in the Green Belt or otherwise affect spatial or area policies of the Core Strategy."

57. The Addendum Judgment was dated 4 March 2013. This required that the following policies are remitted back to the Planning Inspectorate for re-examination:

CS6 Green Belt
CS13 Scale of new housing
CS14 Distribution of new housing
CS19 Strategic gaps
CS28 Weston-super-Mare
CS30 Weston Villages
CS31 Clevedon, Nailsea and Portishead
CS32 Service villages
CS33 Infill villages, smaller settlements and countryside

58. The Judge was clear that while it is only CS13 which was found to be unlawful, because the re-examination of the total housing figure may result in consequential alterations for other policies, then these policies are also remitted. However, "the policies can still be accorded appropriate weight in any decision making and housing can be brought forward through the development control process" (paragraph 20).

59. All the other 25 Core Strategy policies remain extant. These include:

CS10 Transport and movement.
CS16 Affordable housing.
CS20 Supporting a successful economy.
CS21 Retail hierarchy and provision.

D. Re-assessment of the housing requirement.

Examination of remitted policies: Inspector's initial correspondence

60. The new Inspector has indicated that the examination of remitted policies will commence with the re-examination of Policy CS13 which will be subject to a report in respect of this policy alone. It is only if the conclusions from this exercise have a bearing on one or more of the other remitted policies that there will be a need to re-examine the other policies.
61. In the Inspector's Initial Letter of 6 July 2013 (RED/01), he makes his initial assessment of the matters to be addressed; namely the duty to co-operate and strategic context, and the housing requirement. The Council responded in August 2013 (RED/02) and the Inspector replied on 6 September 2013 (RED/03). It is not necessary to repeat the specific issues raised at this point although these are covered elsewhere in this paper.
62. Of key concern to the Inspector was the consistency between the original methodology and the NPPF advice on using objectively assessed needs in the market area. The next sections of this paper introduce the new housing assessment work and how this 'fits' with the original methodology and the employment-led objectives of the plan.

Edge Analytics (September 2013)

63. Edge Analytics were commissioned to advise the Council on updated demographic evidence incorporating the latest information from the 2011 Census, ONS population estimates and 2011-based CLG household projections. They produced a range of alternative growth scenarios using the PopGroup methodology and reported in September 2013.
64. This work was commissioned to provide a further reference point for the assessment of the district housing requirement. While the original approach was robust in the light of the circumstances at the time and available data sources, and was supported by the Inspector, the passing of time from the severe economic downturn in 2008 now means that a sensible assessment of more traditional projections can now be undertaken with more confidence.
65. In their assessment of scenarios, Edge Analytics identify the ONS 2010-based sub-national population projection as the trend benchmark. Although an interim 2011-based projection has been released, this was not seen as being so robust. A number of alternative trend scenarios are tested using different time frames of historical data:

Mig-led 5yrs: internal and international migration assumptions are based on the last five years of historical evidence.

Mig-led 10yrs: internal and international migration assumptions are based on the last ten years of historical evidence.

Mig-led 10yrs5yrs: internal migration assumptions are based on the last ten years of historical evidence, international migration assumptions based on the last five years.

Net Nil: in-migration, out-migration, immigration and emigration are maintained, but the net migration balance is set at zero.

66. For North Somerset the 2011 Census population proved to be significantly lower than that suggested by previous mid-year estimates. Edge Analytics conclude that the main reason for this discrepancy was an over-estimation of international migration (ONS simply identified an 'other attributable' component). While the above trend scenarios assume that the inter-censal population adjustment is accounted for in international migration assumptions, sensitivity tests were also conducted using migration-led scenarios:

Mig-led 5yrs-X: internal and international migration assumptions are based on the last five years of historical evidence, ignoring the 'other unattributable' element of the ONS mid-year estimate recalibration.

Mig-led 10yrs-X: internal and international migration assumptions are based on the last ten years of historical evidence, ignoring the 'other unattributable' element of the ONS mid-year estimate recalibration.

67. Finally Edge Analytics tested two policy-based scenarios: a dwelling-led and a jobs-led scenario. In the latter, where there is an imbalance between the target number of new jobs and the resident population, the model assumes that this will be addressed through migration. However, Edge Analytics consider (paragraphs 5.23-5.31) what would happen if commuting ratios reduce over time leading to greater self-containment in line with the Core Strategy objective. The conclusion is that it is unlikely that the commuting ratio will remain constant over the plan period and that reduced net out-commuting and/or higher rates of economic activity associated with the local labour force (such as greater participation in older age groups) could contribute to lower housing need over the plan period.
68. The methodology also assessed two alternative headship rate assumptions in relation to each of the scenarios and recommended a hybrid approach.
69. Edge Analytics concluded that:

"It is recommended that North Somerset Council adopts the range of 'current trend growth' scenarios as the basis for its review of future housing provision in the unitary authority."

The recommended range is between 812 and 1,018 dwellings pa over the 15 year period 2011-2026.

70. Edge Analytics did not find the term 'latent demand' as used in the legal challenge and referenced in the Judgment a useful concept.

However, they do consider the issue at paragraphs 5.32-5.42. Using the Net-Nil scenario where natural change is the main driver of household growth, this anticipates 243 dwellings per year. However in order to counter the effects of an ageing population and to maintain the size of the labour force a minimum of 708 dwellings per year is estimated. These provide useful benchmarks but other factors need to be taken into account such as rates of participation in older age groups.

E. Proposed revised housing requirement

71. Edge Analytics recommended a range of between 812 and 1,018 dwellings per year over a 15 year period 2011-2026. In order to convert this into a range consistent with the Core Strategy timeframe of 2006-2026 existing completions of 4,950 dwellings 2006-2011 are added to the Edge Analytics scenarios. This produces a range of dwelling requirements as follows:

Low	4950 + 12,180 (812pa)	= 17,130 dwellings
Mid	4950 + 14,445 (963pa)	= 19,395 dwellings
High	4950 + 15,270 (1,018pa)	= 20,220 dwellings.

72. The recommendation is therefore that the North Somerset dwelling requirement is between 17,130 and 20,220 dwellings 2006-2026. This provides an up-to-date objectively assessed needs assessment which government advice states should be the starting point for the calculation of the housing requirement subject to consistency with other policies of the NPPF, particularly the delivery of sustainable development.
73. While the Edge Analytics dwelling range is much higher than the original Core Strategy minimum of 14,000 dwellings (700 pa), evidence was presented to the original examination which demonstrated that housing completions over the plan period were expected to exceed the minimum. In fact the 2011 Strategic Housing Land Availability Assessment identified a potential supply of 17,171 dwellings 2006-2026. These were on sites consistent with the Core Strategy spatial strategy (and therefore not including Green Belt for example) and also did not include an allowance for windfall in the first five years. The updated SHLAA to a base date of April 2013 revises this figure to 19,854 dwellings. In accordance with the more recent NPPF guidance, the updated study makes an allowance for windfall in the first five years, and also an allowance for broad locations 2018-2026.
74. The Council is producing a detailed site allocations plan to deliver the Core Strategy requirements. The Consultation Draft Sites and Policies Plan which was subject to consultation in Spring 2013 demonstrated the Council's resolve to 'boost the supply of housing' by making provision for some 18,099 dwellings, again in conformity with the Core Strategy spatial strategy.
75. On the other hand, the development industry is continuing to press for unrealistically high levels of housing growth. Barton Willmore acting on behalf of housebuilders made recent submissions to the Bath and NE Somerset Core Strategy examination suggesting that the North Somerset requirement should be in the range 28,503-29,365 dwellings, a figure in excess of the draft Regional Spatial Strategy 26,750 dwellings. Even if figures of this magnitude could be substantiated, they could not physically be delivered by 2026. Evidence provided to the original North Somerset examination (HD/01: Issue 1a) was that given the lead in times and infrastructure requirements of large strategic sites, that total delivery across North Somerset was unlikely to be above about 18,000 dwellings during the plan period.

Improving self-containment and the homes/jobs balance

76. The extant policies of the Core Strategy which are not subject to re-examination and remain adopted emphasise the overall employment-led objective and the critical importance of ensuring that in the future the policy approach secures an overall improvement in the homes to jobs ratio, tackles regeneration and a reduction in unsustainable out-commuting. Even in difficult market conditions the employment-led approach is beginning to bite relative to other areas particularly through the promotion of the J21 Enterprise Area and the jobs-led approach at Weston Villages. This momentum needs to be sustained, not undermined by a return to an oversupply of housing which would further reduce self-containment.
77. Improving self-containment is a primary objective of the adopted Core Strategy and an aspect that needs to be considered when determining the level of housing provision. Self-containment is defined as the proportion of economically active residents living and working in an area, and in 2006 self-containment was estimated to be around 65% in North Somerset. This was symptomatic of the underlying imbalance between the numbers of homes (and economically active) compared to jobs available in North Somerset, which has led to relatively high levels of out-commuting to areas outside of North Somerset. To a certain degree this is inevitable given the proximity to, and economic 'pull' of Bristol and the choice in relation to where people live and work. However in North Somerset there is recognition of an imbalance between jobs and homes, associated unsustainable impacts, and a need to plan for sustainable growth within this context. The Inspector's Report (2011) summaries the issue:

"Accordingly, the CS seeks to link new housing to employment in North Somerset, and WsM in particular, in order to improve self-containment, reduce out-commuting and so achieve a more sustainable relationship. This approach is consistent with established regional and local policy and it attracts no substantial challenge to the extent that it applies to WsM. Nor is there any challenge to the premise adopted by NSC that over-provision for housing can lead to unsustainable development with excessive in-migration and out commuting whilst under-provision can result in unaffordable house prices and a high level of in-commuting. It is accepted that an appropriate balance needs to be struck." (Paragraph 11).

78. Paragraph 3.5 of the Stage 2 report explains that to a large extent the buoyancy of the wider West of England economy drives housing pressures in North Somerset rather than the local economy. This has had the effect of increasing the separation between where people live and work in North Somerset and the wider sub-region, bringing with it various consequences for sustainability. The need for planning to temper these market forces is well recognised in order to facilitate sustainable growth and deliver a stronger economic role in North Somerset focused on Weston-super-Mare.

The need for balanced and sustainable growth

79. As a means of improving self-containment, a fundamental strand of the adopted Core Strategy was to deliver a more balanced and sustainable growth in North Somerset that would significantly improve the existing imbalance between homes (and workers) and jobs in North Somerset. At a more detailed scale this objective is about ensuring local employment choices match housing opportunities.
80. Improving self-containment reduces the proportion of workers that commute out of North Somerset, whilst recognising that complete self-containment is not a practical objective given the economic and geographic composition of the West of England sub-region and the propensity for high levels of commuting.
81. The approach is not therefore based on a simplistic assumption that all jobs created in North Somerset will be taken up locally and that no individuals will choose to work further afield. Instead the objective is to provide sufficient opportunities for people to work locally, reducing the propensity for longer car based journeys and providing the context for a more sustainable balance in the future. This principle is a central strand of the Core Strategy and reflects the core sustainability principles of the National Planning Policy Framework, for example, “the planning system should play an active role in guiding development to sustainable solutions” (NPPF, paragraph 8).
82. The table below shows how increasing the dwelling requirement impacts on out-commuting and self-containment. The 14,000 dwelling requirement coupled with the jobs proposed is estimated to have the effect of reducing the scale of out-commuting to around 24,140 in 2026 from an estimated 35,588 in 2006. The additional 3,130 dwellings proposed (17,130 in total) increases this to around 27,267 which is still a reduction of 8,321 from 2006. By comparison an increase of around 26,800 dwellings which is the dwelling requirement which would make no improvement to self-containment across the plan period would see an increase in out-commuting of around 5,260 people to 40,848 by 2026.

Table 1: Impact of different housing requirements on self-containment and out-commuting

NSC dwellings 2006		Number of people out-commuting 2006	Self-containment 2006 (%)
86,744		35,588	65
NSC dwellings 2026		Number of people out-commuting 2026	Self-containment 2026 (%)
86,744	+14,000	24,140	76
	+17,130	27,267	74
	+20,220	31,398	71
	+26,800	40,848	65

Homes to jobs ratio

83. The homes to jobs ratio is a measure of the number of dwellings relative to the number of jobs in an area and provides a broad indication of the overall sustainability balance. Taken at a particular point in time it reflects the underlying relationship between homes, the population and jobs in an area. A ratio of the number of projected homes and jobs provides an indication of future relationships factoring in changes such as population structure and economic participation. In a 'do nothing' scenario the ratio is set to increase in North Somerset as the relative size of the economically active population reduces over time.
84. As a means of demonstrating the historic mismatch between homes and jobs, pre-recession trend data was projecting a ratio of over two homes per job. If applied this would effectively perpetuate those unsustainable trends. This issue was addressed in the North Somerset Position Paper on Issue 2a (HD/07 - paragraphs 6 and 7) where the difference in the relationship between homes and jobs was noted compared to the other authorities in the West of England. In 2006 the homes/jobs ratios for the West of England authorities were:

Bristol	0.49
South Gloucestershire	0.66
Bath & NE Somerset	0.71
North Somerset	1.02

85. The Core Strategy sought to improve the balance and overall self-containment over the plan period by applying a ratio to new development which reflected the projected West of England average of 1:388 homes to jobs. If delivered the overall ratio in North Somerset of 1.02 would increase to around 1.07 by 2026 reflecting the declining working age population as a proportion of the overall population so although there is an increase, it actually reflects a more sustainable balance between homes (and workers) and jobs. Increasing the housing requirement to 17,130 would increase the planned ratio to 1.696. Overall the district ratio would increase to 1.10.
86. It is noteworthy that the High Court Judge concluded that the Inspector has failed to give 'intelligible reasons' when he dealt with the issue of the overall homes to jobs ratio and suggested that he had not understood the evidence. This is not accepted by the Council as it is clear that the relevant sections of the Inspector's Report (paragraphs 24-26) are consistent with, and reflect, the evidence set out in the North Somerset Position Paper HD/07 in respect of known West of England ratios in 2006, the relationship between different local authority areas and the selection of an appropriate ratio for North Somerset.

Commuting ratio

87. The commuting ratio is a measure of the number of economically active persons per job and is another useful indicator of a sustainable balance. In general terms a commuting ratio of 1:1 signals complete

self-containment: a balance between resident workers and jobs. A ratio exceeding 1:1 leads to out-commuting and below leads to in-commuting.

88. The assumptions in the Edge Analytics model assume that the 2001 commuting ratios will remain constant across the 15 year period whereas the advice is that this is likely to improve over time, and even relative modest improvements can equate to less housing being required.

“Whilst net in-migration will continue to contribute to North Somerset’s labour force, it is also likely that substantial jobs growth within the authority would promote greater self-containment of its labour force. Greater self-containment would mean an improvement in the balance between the size of the resident labour force and the number of jobs available; more people living and working locally. A commuting ratio of 1.0 would indicate a local labour force that is equivalent in size to the number of jobs available.” (Paragraph 5.24).

To explore this further Edge Analytics ran a series of scenarios testing improving self-containment and the resulting dwelling requirements.

89. This increase of jobs will likely lead to increased labour force retention, as more jobs growth locally is almost certain to improve self-containment over a period of time as routine turnover in the jobs market occurs - many of the new job opportunities are likely to be taken up by existing out-commuters (as their employment circumstances change), by new or re-entrants to the workforce etc as well as some in-commuters. Therefore, all things being equal, more jobs created locally encourages a reduction in out-commuting (in-commuting also increases marginally). Increasing the number of dwellings further without a corresponding employment growth (see Appendix B) would increasingly dilute the effectiveness of this strategy, moving closer to historic trend relationships between jobs provision and homes development.
90. In summary, given the level of jobs that are proposed (10,100), coupled with the improvements in labour force retention, the level of housing required as a result broadly aligns to the 17,130 trend scenario. Edge Analytics address this issue in paragraphs 5.23-5.31 of their report. Their Table 7 includes a number of sensitivity scenarios testing the likely reduction in the commuting ratio. An improving commuting ratio equates to improving self-containment as a greater proportion of the labour force are retained. To deliver the 10,100 jobs would require 815 dwellings pa assuming an improvement in the ratio to 1.10 by 2026. This broadly aligns to the 17,130 dwellings or 812 pa.

The impact of alternative housing growth targets

91. The updated evidence prepared by Edge Analytics provides a range of scenarios based on a rigorous analysis of trend data including the latest population and household data. As shown in Table 1, the increase to 17,130 from 14,000 indicates that the North Somerset self-

containment could improve to around 74% in 2026, achieving a closer alignment between the workforce and jobs, reducing the scale of out-commuting but recognising that, given the composition and dynamics of the overall sub-region, North Somerset would still be in a net out-commuting position.

92. 'Testing the impact of the proposed and alternative dwelling figures on overall sustainability objectives' attached at Appendix B compares the original 14,000 dwellings with the Edge Analytics low and high projections, as well as the no net change in self-containment figure of 26,800 dwellings. This shows how the sustainability criteria worsen as the housing requirement increases until figures above 26,800 dwellings result in a decline in self-containment across the plan period. However the Core Strategy objective is not simply about not making the existing situation worse but making a real improvement to overall sustainability in North Somerset.

Conclusion

93. North Somerset Council has undertaken a re-assessment of the Core Strategy housing requirement in accordance with the requirements of the High Court Judgment and the NPPF. This involved a new demographic analysis and forecast by Edge Analytics. This up-to-date information has been considered in the context of the original methodology and Core Strategy objectives to identify what the Council considers to be a robust, deliverable and sustainable approach.
94. The additional housing requirement can be accommodated within the existing spatial strategy. Should the examination process conclude that the overall housing requirement should be increased to a level which may require amendments to the existing spatial strategy, then further position papers will be prepared.
95. The Core Strategy Policy CS13 is proposed to be amended to relate to a housing requirement of 17,130 dwellings over the plan period. This will result in:
- A significant boost to housing supply of 22% over the original 14,000 dwellings, consistent with the government's approach to make greater provision within the planning system.
 - A housing requirement that can be delivered by 2026. Even if a higher housing quantum could be justified, if it can't be physically constructed and marketed within the plan period, in step with essential infrastructure, then this is simply a paper exercise.
 - A quantum which can be delivered on sites which are consistent with the existing spatial strategy as demonstrated by the Strategic Housing Land Availability Assessment and the Consultation Draft Sites and Policies Plan. Sufficient opportunities exist without the need for, in particular, Green Belt sites.

- A quantum which will support the employment-led approach in terms of continuing to address the key objective of improving self-containment over the plan period.
 - Adequate provision is made for housing unrelated to jobs growth – the ‘latent demand’ issue.
96. The housing requirement is at the bottom of the range of the up-to-date objectively assessed housing needs, but flexibility is provided by anticipated adjustments to the commuting ratios which over time are likely to decrease the housing requirement as highlighted by Edge Analytics, and is consistent with the overall employment-led approach. The 17,130 dwelling target is considered to represent a practical solution to enable the adoption of the Core Strategy in advance of the review of the West of England SHMA. Setting the housing requirement at this level would also mean that the housing supply could be delivered in accordance with the existing spatial strategy meaning that the other remitted policies would not need to be re-examined.
97. Should the revised SHMA evidence indicate that additional housing provision will be required within the plan period then the appropriate response will be determined on a West of England basis through the duty to co-operate.

F. Proposed amendments to the remitted policies

Proposed Core Strategy amendments

98. The Council's response to the examination of remitted policies was formally considered at Full Council on 12 November 2013 where a revised approach was agreed. The proposed approach is to amend Policy CS13 as follows:

Policy CS13

A supply of deliverable and developable land will be identified to secure the delivery of 17,130 dwellings within North Somerset 2006-2026.

99. The full proposed text of CS13 including the suggested amendments to the supporting text is set out at Appendix A. No changes are proposed to the other remitted policies, except in respect of CS14, CS28, CS30 and CS31 where the increase from 14,000 to 17,130 dwellings will require some numerical adjustments to the spatial distribution of the housing requirement. These proposed amendments are also set out in the appendix.

Appendix A

North Somerset Core Strategy: examination of remitted policies

North Somerset Council's proposed amendments to the Core Strategy policy text

November 2013

This Appendix sets out the proposed amendments to the full text of remitted policy CS13, and consequential changes to relevant parts of CS14, CS28, CS30 and CS31 as a result of the proposed increase in the housing requirement. No changes are proposed to any of the other remitted policies.

Changes to the original text of the April 2012 adopted Core Strategy are shown as **bold** (new text) or ~~strike through~~ (deleted text).

CS13: Scale of new housing

A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 14,000 **17,130** dwellings within North Somerset 2006–2026.

~~The appropriate level of new homes will be reviewed in 2016 and 2021.~~

This policy contributes towards achieving Priority Objective 1.

Background

~~3.179 Given the government's intention to revoke the Regional Spatial Strategy decisions on housing supply will rest with local planning authorities without the framework of regional numbers and plans. While the housing requirement must be evidence-based and consistent with national advice, there will no longer be a requirement to conform to a top-down regional target. In order to identify a North Somerset-wide housing requirement, the council commissioned technical advice to assess the evidence, and to recommend an appropriate level of growth over the plan period.~~

3.179 The determination of the appropriate level for the district housing requirement has been prepared against an uncertain planning context in terms of regional planning, the localism agenda, and the interpretation of the NPPF, as well as economic downturn which resulted in unprecedented changes to the construction industry, market demand, housebuilding and job creation. Government advice is that the housing requirement should be based on an objective assessment provided that this is consistent with the delivery of sustainable development. Within North Somerset an uncritical application of pre-recession trends would simply replicate the unsustainable development patterns of the past and fail to address the Core Strategy objectives of reduced out-commuting, regeneration and improved self-containment.

The Core Strategy approach

~~3.180 The Core Strategy housing requirement is based on the recommendations of the independent study 'North Somerset Council: Determining a locally derived district Core Strategy housing requirement to 2026' (October 2010). This study provided evidence-based guidance on the future level housing in the light of changing economic and social trends, assessed alternative methodologies and recommended an approach based on realistic economic growth forecasts over the plan period.~~

~~3.181 The key issues considered by the study were:~~

- ~~● Population growth and declining household size;~~
- ~~● The effect of, and prospects for, economic growth;~~
- ~~● The dynamics of the local housing market.~~

- 3.180 **Within North Somerset over the plan period the Core Strategy seeks to create a better, more sustainable balance between housing and employment whilst making appropriate provision to meet housing needs.** North Somerset has experienced relatively high levels of housing demand but low levels of economic growth. It is pressure from the more economically buoyant parts of the sub-region, particularly Bristol and Bath, coupled with relatively low house prices which are the major determining factors driving housing growth pressures, and contributing to relatively low job growth and high levels of out-commuting. The Core Strategy approach is to ensure that housing growth is much more closely linked **related** to employment growth (employment-led) than in the past and that housing supply is better managed in order to provide sufficient housing to meet ~~locally arising~~ **objectively assessed** needs without ~~attracting inappropriate levels of in-migration~~ **undermining the Core Strategy objective of securing improved overall self-containment.**
- 3.181 ~~The Core Strategy housing requirement is based on the recommendations of the independent study~~ **has regard to two key evidence sources:** 'North Somerset Council: Determining a locally derived district Core Strategy housing requirement to 2026' (October 2010) **and Edge Analytics: Demographic Analysis and Forecasts (September 2013).** ~~This The former study provided evidence-based guidance on the future level housing in the light of changing economic and social trends, assessed alternative methodologies and based on realistic economic growth forecasts over the plan period.~~ recommended an approach **for identifying a housing requirement at a time when trend projections after a period of strong economic growth were becoming increasingly unreliable and the scale of new housing implied would have had significant adverse consequences for sustainable development patterns over the plan period. The Edge Analytics study represented a more up-to-date demographic forecast and analysis undertaken at a time of more certainty in terms of forecasting across the plan period. The Council's approach has been to identify an objectively assessed housing requirement which complements the overall employment-led approach.**
- 3.182 **Between 2006 and 2026 provision will be made for 17,130 new dwellings. As at April 2013 5,992 dwellings had been completed leaving 11,138 dwellings to be delivered 2013-2026. The Council will seek to achieve an annualised rate of housing delivery over the remaining 13 years of the plan period which equates to 857 dwellings pa. To comply with the requirements of the NPPF the Council will identify sufficient sites to provide five years worth of housing with an additional buffer of 5% to ensure choice and competition in the market for land.**
- 3.183 ~~The study identified principles to help guide the process of identifying an appropriate level of housing development, together with possible policy options in order to test the results. Economic scenarios were then applied relating to different rates of national economic performance.~~

~~3.184 The assessment and testing concluded that housing delivery for North Somerset 2006–2026 should be a minimum of 14,000 dwellings (700 per annum).~~

3.183 As at 1 April 2014 **2013** the housing land supply situation was as follows:

Completions 2006–2014 2013	4,950 5,992 dwellings
Remaining Local Plan allocations	591 4,998 dwellings
Planning permissions	3,200 3,054 dwellings
Total	8,741 14,044 dwellings

~~3.186 Based on a North Somerset housing requirement of 14,000 **17,130** dwellings this leaves 5,259 ~~xxxx~~ dwellings to be identified to 2026 (although it cannot be assumed that all permissions will be implemented).~~

How and where the policy will be delivered?

3.1874 The Core Strategy will identify the policy context for the delivery of the residual housing requirement over the remainder of the plan period through the settlement strategy and the strategic allocation at Weston. Policy CS14 sets out the distribution of the proposed housing supply.

3.1885 The policy will be delivered primarily through private development, but there will be considerable partnership working involved, particularly in relation to infrastructure provision, ensuring employment-led development and affordable housing.

Monitoring and review

3.1896 Housing supply is monitored annually in order to ensure that there remains a flexible supply of deliverable and developable land for housing.

~~3.19087 The council will review the appropriate level of new homes in 2016 and 2021. It will examine **Regard will be had to** all available evidence sources including demographic evidence, economic conditions and forecasts. If evidence suggests that additional provision of homes will be required **then this may require a Core Strategy review before 2026.**the review will consider the appropriate response. If additional strategic provision is required its delivery will be determined on a West of England wide basis through the duty to co-operate.~~

3.188 The West of England SHMA is being reviewed in conjunction with the other relevant authorities in the sub-region. If this process identifies that additional strategic provision is required its delivery will be determined on a West of England-wide basis through the duty to co-operate.

CS14: Distribution of new housing

New housing development 2006–2026 will be accommodated in accordance with the following hierarchy:

Weston-super-Mare will be the focus for new residential development within North Somerset, including the strategic allocation at Weston Villages. Development at Weston will be employment-led.

Outside Weston, most additional development will take place in the towns of Clevedon, Nailsea and Portishead on existing site allocations or through new development within their settlement boundaries, or in Nailsea through site allocations outside the Green Belt.

In the rural areas new residential development will be strictly controlled although at service villages there will be opportunities for small-scale development either within settlement boundaries or through site allocations. In infill villages limited infilling will be acceptable within settlement boundaries.

Priority will be given to the re-use of previously developed land. In all cases, new housing development must not conflict with environmental protection, Green Belt, nature conservation or any other relevant policies of the Development Plan and should provide any necessary mitigating or compensatory measures to address any adverse implications.

Residential density will be determined primarily by local character and good quality design. The target net density across North Somerset is 40 dwellings per hectare, although this may be higher at highly accessible locations, and less in sensitive areas or where lower density development is positively encouraged.

Settlement boundaries for Weston-super-Mare, Clevedon, Nailsea, Portishead, the service villages and infilling villages will remain as defined in the Replacement Local Plan pending any alterations as part of any future Sites and Policies Development Plan Document or a Neighbourhood Development Plan. All other settlement boundaries will be deleted.

The broad distribution of new dwellings will be a minimum of:

Area	Net additional dwellings 2006-2026	
Weston urban area (excluding Weston Villages)	3,458	5,136
Weston Villages	5,500	5,800
Clevedon, Nailsea and Portishead	3,715	4,180
Service villages	805	1,168
Other settlements and countryside	522	846
Total	14,000	17,130

This policy contributes towards achieving Priority Objective 1 and 5.

Amendments to the supporting text to Policy CS14

Table following paragraph 3.194

The land supply position at April 2014 **2013** is set out in the following table.

	Completions 2006-2014 2013		Permissions at 1 April 2014 2013		Remaining RLP allocations at 2014- 2013		Total commitments		Remaining requirement
Weston urban area	2,045		600		463		3,108		350
	2,321		691		304		3,316		1,820
Weston Villages	0		1,000		0		1,000		4,500
	68		1,082		4,650		5,800		0
Clevedon	200		84		70		354		409 1,266
	253		106		20		379		
Nailsea	89		21		0		110		
	109		16		0		125		
Portishead	1,795		1,136		20		2,951		
	2,292		634		0		2,926		
Service villages	510		201		24		735		
	561	821	207	359	24	38	792	1,218	
Remainder of North Somerset	311	949	158	525	14	24	483	1,498	
	388		318		0		706		
Total	4,950		3,200		591		8,741		5,259
	5,992		3,054		4,998		14,044		3,086

Table following paragraph 3.197

The anticipated housing trajectory for North Somerset, based on a minimum of 14,000 **17,130** dwellings is as follows:

	2006- 2011	2011- 2016	2016- 2021	2021- 2026	Total
Weston urban area	2,045	1,063	175	175	3,458
		873	1,080	1,138	5,136
Weston Villages	0	1,450	2,350	1,700	5,500
		525	2,510	2,765	5,800
Clevedon	200	154	50	50	454
		129	93	71	493
Nailsea	89	21	50	50	210
		29	203	326	647
Portishead	1,795	1,156	50	50	3,051
		878	296	71	3,040
Service Villages	510	225	35	35	805
		189	234	235	1,168
Elsewhere	311	172	20	19	522
		268	180	87	846

Total	4,950	4,241	2,730	2,079	14,000
		2,891	4,596	4,693	17,130

Amendments to Policy CS28

CS28: Weston-super-Mare

Weston-super-Mare will be the primary focus for development within North Somerset. The town will accommodate around ~~6,913~~ **5,136** additional new dwellings balanced with approximately 10,500 employment opportunities from ~~2014~~ **2013**–2026 as part of an employment-led strategy to deliver improved self-containment and reduced out-commuting during the plan period.

New development in Weston-super-Mare will be focused on two key locations:

Town centre and gateway where the emphasis is on the regeneration of a range of key sites to stimulate investment, and will include residential, retail, employment and leisure opportunities (see Policy CS29).

Weston Villages where the emphasis is on comprehensive development to create two sustainable new communities linked to the delivery of employment (see Policy CS30).

Residential development in the town will be delivered in accordance with the employment-led strategy (see policies CS20 and CS30 for more detail).

No strategic development will be permitted to the east of the M5 motorway. The settlement boundary of Weston-super-Mare will be extended to incorporate the new Weston Villages.

Within Weston-super-Mare, new development proposals will be encouraged where they:

- contribute to increasing self-containment and do not further exacerbate the existing unsustainable jobs/homes imbalance in the town. Large sites proposed for residential development must either provide on-site employment opportunities or, where this is not appropriate, provide off-site contributions;
- reinforce the focus of the town centre as the location for higher order facilities and services, including retail, tourism and leisure opportunities;
- prioritise the development of previously developed land, particularly within the new development areas identified above unless required for the delivery of strategic infrastructure;
- support existing community hubs of local retailing and other services located within the town;
- reflect and enhance the characteristic built historic elements of Weston-super-Mare such as its stone buildings, formal parks and conservation areas;
- enhance its green infrastructure and biodiversity, particularly the ridges to the north and south, the woodland areas, the rhynes network, and the seafront;
- address issues of deprivation and inequality particularly in South Ward and Central Ward;

- improve accessibility within Weston-super-Mare by walking, cycling and public transport, particularly where they enhance connectivity with, for example, local facilities, service centres, the town centre and sea front;
- retain and enhance the boulevard effect of the main approaches into the town.

This policy contributes towards achieving Priority Objective 1, 2, 3, 4, 7, 8, 9, and 10.

Amendments to Policy CS30

CS30: Weston Villages

To the south east of Weston-super-Mare two mixed-use, employment-led, socially, economically and environmentally sustainable new communities will be developed. A Supplementary Planning Document (SPD) including a Masterplanning Framework and delivery plan will provide the detailed guidance to support implementation. The Key Diagram Inset 2: Weston Villages sets out the indicative strategic development framework and provides the context for further, more detailed work.

The development of the Weston Villages must satisfy the following key requirements:

- Development will be employment-led with the provision of 1.5 jobs per dwelling over the plan period. Detailed mechanisms for delivering employment-led development including the quantum, thresholds and phased release of land in each village will be determined through a combination of masterplanning, a Supplementary Planning Document, and through a Section 106 planning agreement that would accompany any such approval for development at each village.
- Provide about ~~5,500~~ **5,800** new homes in a mix of housing types, tenures, sizes and styles of which a target of 30% should be affordable. An average density of 40dph should be achieved across the area, with higher densities surrounding the local centres and, where appropriate, the inclusion of lower density areas.
- Provide at least 37.7 ha of B Use Class employment land located within allocated employment sites, mixed-use development areas and at local and district centres. If provision of strategic infrastructure is dependent on development on greenfield land then this will be taken into consideration as part of the phasing strategy. In addition phasing will take into account sustainability and viability issues.
- Each village will be anchored by a local centre which will provide necessary retail, health, children's services and educational and community facilities to serve local needs. The location, type and mix of such uses will be agreed through the Weston Villages SPD.
- Site(s) for on-site renewable or low carbon energy production including associated infrastructure to facilitate site-wide renewable energy solutions will be provided; such infrastructure should be planned with energy providers and developers including long term management and maintenance. Such provision could include a waste to energy plant. The Weston Villages area has been identified as being suitable for such waste treatment facilities in the West of England Joint Waste Core Strategy.
- Provision of a network of green infrastructure across the whole Weston Villages including playing fields, allotments, play areas, pocket and community parks, and green corridors. This should be linked through development allowing wildlife movement and access to open space, wetlands and water corridors linking through development, including the retention and enhancement of existing rhynes where appropriate.
- Deliver integrated strategic transport infrastructure including:
 - the Cross Airfield Link at Winterstoke Village;

- the Airfield Bridge Link linking Winterstoke Village to land to the north across the railway line;
 - Junction 21 Relief Road or alternative;
 - A371 to Wolvershill Road/Churchland Way Link;
 - potential park and ride subject to feasibility studies;
 - convenient and accessible bus routes;
 - accessible and safe cycle routes and public footpaths;
 - rail and bus improvements.
- Deliver a clear hierarchy of roads (from distributor to home zones) producing discernable and distinctive neighbourhoods which are integrated and linked to existing areas.
 - The delivery of the strategic flood solution plus onsite flood mitigation measures, such as sustainable drainage systems, must be delivered as part of any development proposal in addition to long term maintenance details. This is required in order to facilitate the development of the Weston Villages. Any development within the Weston Villages will be required to contribute towards these flood mitigation measures.
 - Any proposed development will need to be supported by a flood risk assessment which will include a surface water drainage strategy.
 - Facilitate and recognise the realignment and safeguarding of safety and noise corridors associated with the helicopter flights linked with the Helicopter Museum in line with specialist advice. Employment, open-space and uses that are least sensitive to helicopter disturbance will be located around the museum.
 - Development proposals within the Weston Villages area will be expected to contribute to identified strategic infrastructure requirements in order to deliver a comprehensive and sustainable development.
 - Development must be of a high quality and locally distinctive to Weston enhancing the existing character and qualities that contribute to the town's identity. This should include a comprehensive approach to place-making including all the elements that make up an area including land uses, parking, movement and green spaces.
 - Strategic gaps between the Weston Villages and Hutton and Locking will protect their individual character and identity.
 - Development must include a comprehensive approach to community building in respect of measures and facilities to support social interaction and community engagement throughout the life of the proposal.

This policy contributes towards achieving Priority Objective 1, 2, 3, 4, 7, 8, 9, and 10.

Amendments to Policy CS31

CS31: Clevedon, Nailsea and Portishead

Proposals for development within settlement boundaries in Clevedon, Nailsea and Portishead will be supported which:

- increase self containment;
- ensure the availability of jobs and services for the town and surrounding catchments;
- improve the town role as a service centre.

Within the three towns provision will be made through the plan period as follows.

	Houses (2006–2026)	Indicative Jobs (2006–2026)
Clevedon	454 493	812
Nailsea	210 647	196
Portishead	3,051 3,040	2,277

Residential development within the settlement boundaries of the three towns will be acceptable in principle provided it reflects the character of the local environment and doesn't cause any adverse impacts. Within Nailsea proposals which improve the mix and balance of housing types and tenure to encourage a more balanced age structure will be supported.

In all three towns employment proposals will be supported that ensure the regeneration of previously developed land, or conversion and/or refurbishment of existing premises. Employment uses should be appropriate in scale to the role and function of the town in accordance with Core Strategy policy CS20. Alternative uses, including mixed use schemes on existing employment sites will only be considered where they are shown to address other identified community benefits and do not have an adverse impact on the quality and range of sites and premises available for business use.

Shopping and town centre uses will be supported within the town centres which improve the town centre environment and the retail, leisure, and employment offer. The removal of town centre uses will only be permitted in accordance with Policy CS21. Proposals for the regeneration of existing centres such as at Nailsea and Clevedon, or the enhancement of specialist areas such as Hill Road, Clevedon will be encouraged.

Other services and community facilities will be encouraged within the urban areas, in locations accessible to the community which they are intended to serve.

Transport proposals which provide opportunities for cycling, walking or increase public transport within the towns will be supported. Proposals to improve connectivity by public transport with other towns, Bristol and Weston-super-Mare will also be supported. For Portishead the re-opening of a rail/rapid transit link to Bristol is a priority.

Tourism proposals throughout Clevedon and Portishead will be supported with particular emphasis on enhancing the appeal of the seafront/waterfront area to visitors and residents alike, whilst retaining the historic and natural settings.

Proposals at Nailsea for new mixed use schemes adjacent to the settlement boundary to meet identified local needs will be supported provided that the site is not in the Green Belt, it is supported by the local community and any necessary site allocations and changes to the settlement boundary have been addressed in the Sites and Policies Development Plan Document.

This policy contributes towards achieving Priority Objective 1, 3, 6, 7, 8, 9, and 10.

Amendments to the supporting text of Policy CS31

4.82 Within Clevedon, Nailsea and Portishead new jobs, dwellings and retail floorspace (2006–2026) will be broadly provided as follows:

<u>Land use</u>	<u>Nailsea</u>	<u>Portishead</u>	<u>Clevedon</u>
Employment (jobs, all sectors)	196	2,277	812
Residential (dwellings)	210 647	3,054 3,040	454 493
Retail (m ²)	0	14,096	0

The retail floorspace for Portishead includes developments built since 2006, existing commitments and an estimate of additional convenience (1616 m²) and comparison (1826 m²) floorspace requirements contained with the 2011 Study.

Appendix B

North Somerset Core Strategy: examination of remitted policies

Testing the impact of the proposed and alternative dwelling figures on overall sustainability objectives

November 2013

The tables in this appendix provide a summary of the demographic and employment factors and key sustainability indicators across four different district housing requirements of 14,000 dwellings (Core Strategy), 17,130 (Edge Analytics low), 20,220 (Edge Analytics high) and 26,800 dwellings (the level at which self containment remains unchanged within North Somerset over the plan period).

Comparison of key outputs					
Dwellings 2006-26	Population change 2006-26	Labour supply change 2006-26	Household change 2006-26	Self-containment (%) by 2026	Out-commuting change 2006-26 (people)
14,000	20,704	-1,563	12,618	76%	-11,448
17,130	27,429	1,565	15,630	74%	-8,321
20,220	35,661	5,701	18,598	71%	-4,190
26,800	52,708	15,151	24,940	65%	5,260

14,000 dwellings	2001	2006	2011	2026	Change 2006-26
Demographic factors					
Population	188337	195709	202566	216413	20704
Households	80021	84320	88227	96938	12618
Average persons per household	2.31	2.28	2.26	2.20	
Households with no economically active persons	28087	29596	30968	34025	4429
Dwellings	82635	86744	91694	100744	14000
Population aged 16-64	116382	120937	123281	119027	-1910
Economically active population	91767	102200	102607	100637	-1563
Average economically active/dwelling	1.111	1.178	1.119	0.999	
Economically active persons per household	1.8	1.9	1.8	1.6	-0.3
Employment factors					
Jobs	75000	84000	83700	94100	10100
Commuter inflow	15553	17388	16489	17597	209
Commuter outflow	30553	35588	35396	24140	-11448
Net outflow	-15000	-18200	-18907	-6543	
Key sustainability indicators					
Jobs per economically active	0.82	0.82	0.82	0.94	0.11
Self containment (%)	65	65	66	76	10.8
Homes to jobs ratio	1.10	1.03	1.10	1.07	1.39
Commuting ratio	1.22	1.22	1.23	1.07	-0.15

17,130 dwellings	2001	2006	2011	2026	Change 2006-26
Demographic factors					
Population	188337	195709	202566	223138	27429
Households	80021	84320	88227	99950	15630
Average persons per household	2.31	2.28	2.26	2.20	
Households with no economically active persons	28087	29596	30968	35082	5486
Dwellings	82635	86744	91694	103874	17130
Population aged 16-64	116382	120937	123281	122726	1789
Economically active population	91767	102200	102607	103765	1565
Average economically active/dwelling	1.111	1.178	1.119	0.999	
Economically active persons per household	1.8	1.9	1.8	1.6	-0.3
Employment					
Jobs	75000	84000	83700	94100	10100
Commuter inflow	15553	17388	16489	17597	209
Commuter outflow	30553	35588	35396	27267	-8321
Net outflow	-15000	-18200	-18907	-9670	
Key sustainability indicators					
Jobs per economically active	0.82	0.82	0.82	0.91	0.08
Self containment (%)	65	65	66	74	8.5
Homes to jobs ratio	1.10	1.03	1.10	1.10	1.696
Commuting ratio	1.22	1.22	1.23	1.10	-0.11

20,220 dwellings	2001	2006	2011	2026	Change 2006-26
Demographic factors					
Population	188337	195709	202566	231370	35661
Households	80021	84320	88227	102917	18598
Headship rate	2.31	2.28	2.26	2.22	
Households with no economically active persons (latent demand)	28087	29596	30968	36124	6528
Dwellings	82635	86744	91694	106964	20220
Population aged 16-64	116382	120937	123281	127254	6317
Economically active population	91767	102200	102607	107901	5701
Average economically active/dwelling	1.111	1.178	1.119	1.009	
Economically active persons per household	1.8	1.9	1.8	1.6	-0.3
Employment factors					
Jobs	75000	84000	83700	94100	10100
Commuter inflow	15553	17388	16488.9	17597	209
Commuter outflow	32071	35588	35396	31398	-4190
Net outflow	-16518	-18200	-18907	-13801	
Key sustainability indicators					
Jobs per economically active	0.82	0.82	0.82	0.87	0.05
Self containment (%)	65	65	66	71	5.7
Homes to jobs ratio	1.10	1.03	1.10	1.14	0.10
Commuting ratio	1.22	1.22	1.23	1.15	-0.07

26,800 dwellings	2001	2006	2011	2026	Change 2006-26
Demographic factors					
Population	188337	195709	202566	248417	52708
Households	80021	84320	88227	109259	24940
Headship rate	2.31	2.28	2.26	2.24	
Households with no economically active persons (latent demand)	28087	29596	30968	38350	8754
Dwellings	82635	86744	91694	113549	26805
Population aged 16-64	116382	120937	123281	136629	15692
Economically active population	91767	102200	102607	117351	15151
Average economically active/dwelling	1.111	1.178	1.119	1.033	
Economically active persons per household	1.8	1.9	1.8	1.7	-0.2
Employment factors					
Jobs	75000	84000	83700	94100	10100
Commuter inflow	15553	17388	16489	17597	209
Commuter outflow	32071	35588	35396	40848	5260
Net outflow	-16518	-18200	-18907	-23251	
Key sustainability indicators					
Jobs per economically active	0.82	0.82	0.82	0.80	-0.02
Self containment (%)	65	65	66	65	0.0
Homes to jobs ratio	1.10	1.03	1.10	1.21	2.65
Commuting ratio	1.22	1.22	1.23	1.25	0.03