

BRISTOL CORE STRATEGY EXAMINATION

INSPECTOR'S FURTHER QUESTIONS ON OVERALL HOUSING PROVISION AND THE GREEN BELT

1. On 6 July 2010 the Secretary of State announced the revocation of Regional Spatial Strategies with immediate effect. The Chief Planner at CLG wrote to all local authorities with guidance on the consequences of this action, including for the progression Local Development Frameworks. All parties will need to have regard to this advice. (Letter and Guidance available at: <http://www.communities.gov.uk/publications/planningandbuilding/letterregionalstrategies>)

2. Given the Secretary of State's action, it should now be possible to proceed with the hearings relating to overall housing provision and the Green Belt postponed from June. These will now take place on 7 & 8 September as provisionally indicated in my note of 2 July. I have set out questions below to guide further responses on these issues. Any further statements relating to these issues should be submitted to the Programme Officer by **23 August**, as indicated in my previous note. In the light of the further statements submitted, I will prepare detailed questions for discussion at the hearing sessions, which will be circulated to participants a few days in advance.

3. As already requested, if any previous participants no longer wish to appear please inform the Programme Officer (PO). If any representors who made relevant representations on the matters to be covered by the postponed hearings previously did not wish to participate but now do, they should also inform the PO by 23 August. Any relevant representor not wishing to participate in the hearings may submit a written statement in response to the Council's statements by Friday 3 September.

4. At this stage, I do not anticipate the hearings on 7 & 8 September covering any matters not referred to above. I would remind all parties that any significant changes to the Core Strategy (whether proposed by the Council or by me) will need to be the subject of appropriate consultation following these hearing sessions. If the Council were to suggest very substantial changes to the scale or strategy for housing, I would need to consider whether it is still efficient and effective to hold the hearing sessions in advance of formal consultation on such changes.

Regional Spatial Strategy

5. The existing Regional Spatial Strategies have been revoked and the Government intends to proceed with legislation to abolish regional spatial strategies. I have not seen any formal announcement regarding the withdrawal or abandonment of the emerging RSS for the South West, but given the Government's stated policy and actions, is it reasonable to conclude that the emerging RSS will not be progressed and should no longer be afforded any status?

Overall Housing Provision

6. In the absence of direction provided by the RSS process, what is the appropriate level of housing that the Core Strategy should facilitate? (Explored further in the questions below.)

7. The Council should explain what account it has taken of the matters set out in PPS3 paragraph 33 in determining the appropriate level of housing in the Core Strategy (whether or not this is the same as in the submitted Core Strategy or a different figure). Other parties should address, if they wish, their assessment of what this evidence indicates as the appropriate level of housing provision. These assessments should address the following questions, among other matters.

8. Should housing provision aim to meet the most recent projections of population/household growth for the City over the plan period? Would it be realistic to do so bearing in mind the proportion of households for whom market housing would be unaffordable?

9. To what extent does the need for a substantial scale of affordable housing (as set out in the Strategic Housing Market Assessment - CDE10) support maximising the overall scale of housing provision?

10. To what extent do any delivery or environment constraints support housing provision below that which evidence of need might suggest?

11. Given the Government's clear "localism" agenda (reflected, in part, by the revocation of RSSs), should any additional weight be given to the Council's preferred level of housing, even if some evidence were to suggest that provision should be greater?

Policy BCS5

12. In the light of the above, is policy BCS5 sound? If not, what changes are needed to make it sound?

13. Given that there is now no uncertainty about what the RSS might have required, to what extent are the proposed contingences necessary (although flexibility remains an important consideration for soundness)? I consider that the detail relating to the contingencies from *small sites* and *industrial and warehousing land* have been fully discussed and no further statements are requested and no further discussion is anticipated on these topics.

14. Much of the supporting text to BCS5 makes reference to the emerging RSS. It is now out of date and will not assist in explaining the justification for or application of the policy. Council to include new suggested supporting text in its statement for discussion at the hearing.

The Green Belt

15. Does the appropriate scale of housing required over the plan period require provision within the Green Belt? In the absence of any steer in a higher level (emerging) policy, are there any exceptional circumstances (PPG2 paragraph 2.6) to justify altering Green Belt boundaries in relation to housing provision?

16. Given the Government's clear "localism" agenda should any additional weight be given to the Council's preference in relation to the Green Belt, compared with other evidence relating to housing need and delivery?

17. Have adjoining Councils signalled any changes (or re-commitment to previous intentions) in relation to development of urban extensions in the Green Belt adjoining Bristol City's boundary? What is the current position on cross-border working in relation to the urban extensions previously proposed in the emerging RSS?

18. Are any changes required to the text on the Green Belt or to policy BCS6 to reflect current circumstances and consistency with policy BCS5?

19. In my *Final Main Issues for Examination, Comments and Questions* (13 May 2010), I set out a number of detailed questions about the urban extensions and the Green Belt to the south west and to the south east of the city. Some of these questions are no longer relevant as they sought to understand the reasoning in the emerging RSS. I will consider what remaining detailed matters need to be explored at the hearings in the light of the further statements on the overall level of housing provision and the principle of any development in the Green Belt.

Flood Risk and the Sequential Test

20. Arising from the discussion of flood risk at the hearing on 23 June, I asked the Council to explain in an updated position paper how it has applied the sequential test to housing, taking into account flood zones with climate change and reflecting any revisions to the Council's planned strategy for housing. The Council will also need to put forward possible changes to the text of the Core Strategy to refer to the application of the sequential approach and to explain how mitigating flood risk may affect delivery of housing in the city centre. I anticipate that a short hearing session will be required to discuss whether the Council's updated position paper adequately reflects national advice in PPS25 and whether the proposed changes would make the Core Strategy sound in this respect.

Simon Emerson
INSPECTOR
22 July 2010