

BRISTOL CORE STRATEGY EXAMINATION

INSPECTOR'S PRELIMINARY COMMENTS REGARDING HOUSING PROVISION - RESUMED HEARING 7/8 SEPTEMBER.

1. With the revocation of the Regional Spatial Strategy it is for the Council to determine the appropriate level of housing provision and to support that figure with evidence to be tested at Examination. The Council is suggesting a change to the submitted Core Strategy to indicate a reduction in the firm commitment to housing delivery to 26,400, with an aspiration for 30,000. In the light of the statements of the Council and others I have several concerns. I highlight these now so that the Council can consider the most appropriate way of proceeding.

2. The Council's statement is commendably succinct, but provides only a brief assessment of some of the factors identified in PPS3 (paragraph 33) to be taken into account in assessing the need and demand for housing in the city (against which to compare or balance housing land supply considerations).

- I am unclear what conclusion the Council draws from the SHMA on market demand.
- The Council indicates considerable caution should be applied to the use of the most recent household projections. It is unclear what significance the Council attaches to the earlier household projections which informed the EIP Panel's recommendation for 30,000 dwellings (2003 based figures) and, in part, the Secretary of State's Proposed Changes to 36,500 dwellings (2004 based figures). In both cases the recommended housing provision fell short of the projections.
- There is no reference to any of the advice from the National Housing and Planning Advice Unit. Although the unit has been closed, I am not aware that the reference to it has been deleted from PPS3. Its previously published advice is still available at: <http://www.communities.gov.uk/nhpau/keypublications/reports/>
- Given the size and significance of Bristol City within the West of England sub region, I consider that the assessment of appropriate housing provision should be informed by discussion with adjoining authorities (this is my reading of the first sentence of paragraph 33 even when *Regional* has been deleted).
- In proposing changes to the housing requirements in the emerging RSS the Secretary of State set out a number of (evidence based) reasons for increasing housing provision above that recommended by the Panel (CDE51 RS2 pp49-57). Which of these considerations do the Council consider remain relevant to assessing housing provision in the city?
- More generally, how has consideration of housing provision been related to expectations of economic growth within the city and wider considerations of sustainability such as the potential to reduce in-commuting by providing more housing closer to the main centre of employment in the sub region.

3. The Council's statement is clear as to the reasons for suggesting a reduction in expected delivery of housing from within the urban area (because of flood risk and uncertainty of public funding for some regeneration projects). But in the absence of any substantive assessment of housing need and demand, I cannot see how the Council has made a balanced judgement as to whether or not there are the exceptional circumstances to justify changing the Green Belt boundary to accommodate some additional housing provision. The Council refers to the Secretary of State's letter of 6 July 2010 that the Government is committed to the protection of the Green Belt, but the test in PPG2 for changing Green Belt boundaries remains the same as before.

4. Although the Council emphasises that it retains an *aspiration* for 30,000 dwellings, the figure of 26,440 is proposed as the new minimum base line commitment which would be used for assessing the 5 year land supply. From what I have read, I could not accord much significance to an aspirational figure. The Council's suggested minimum of 26,400 would represent a significant change to the submitted plan. It is a change which would need to be the subject of Sustainability Appraisal as well as wider consultation in due course. As previously emphasised, I can only recommend a change to the submitted document if I find it unsound.

5. The evidence referred to by other parties strongly points to the city maximising housing provision subject only to considerations of housing land supply and deliverability. A number of parties seek an increase in housing provision from 30,000 to 36,500, reflecting the Secretary of State's Proposed Changes to the then emerging RSS. Whilst I recognise that this would move somewhat towards meeting household growth projections, in the light of all the evidence to date, I cannot see how such a figure could be delivered even with urban extensions in the Green Belt. At any hearing, I would wish to explore the capacity of the Green Belt within Bristol City to accommodate housing.

6. I would ask the Council to reflect on my concerns about the evidence it has provided in relation to housing need and demand. I do not know whether additional evidence covering the matters I have highlighted would make a significant difference to the balance of considerations, but I want to give the Council the opportunity of further work. Housing provision is a critical part of the soundness of the Core Strategy and the revocation of the RRS means that there is now a greater and more explicit burden on the Council to justify the figure in the Core Strategy.

7. If the Council does wish to respond to the matters I have highlighted, I do not expect the Council to be able to do so by 7 September. In any case, I and other parties would need time to assimilate any new material. There is the option of postponing the hearing for such further work to be undertaken. If that were to be done, I consider that it would be appropriate also to undertake a Sustainability Appraisal of the proposed change and wider consultation so that a resumed hearing could encompass all matters likely to arise. Consideration should then also be given to consulting on the other changes that the Council has now suggested in response to my concerns on other matters (subject to some revision between the schedules and of the detailed wording). The hearing would have to be postponed for several months.

8. If the hearing is to be cancelled/postponed the Programme Officer would need to notify participants during Thursday 2 September to avoid any participant not receiving the message in time. If the hearing is to continue, I still need to prepare an agenda, which should also be circulated by that date. However, I need to prepare the agenda within the next couple of days because of other commitments next week. If the Council decides quickly that it wishes to proceed with the hearing please let the PO know as soon as possible.

9. I am sure all parties recognise the somewhat uncharted waters this hearing has to address and the need for me to be fully informed on relevant matters. I apologise for the uncertainty this note will cause.

Simon Emerson
Inspector
26 August 2010.