

BCC Response Statement

This statement sets out how the Council has responded to the matters set out in the Inspector's note of 2 July 2010 on matters arising from the hearing sessions.

The Inspector's comments dated 2 July 2010 are shown below. The Council's response is shown in **bold text** below the relevant sections.

2. Tuesday Issue 2 (part)

2.1 Further information to be provided on:

i) The size/capacity of the 21 sites with planning permission regarding which there was no response to the Council's questionnaire to developers on the likely delivery of their developments.

ii) A single page table comparing the overall capacity of sites without planning permission identified in the SHLAA (eg the total from the identified SHLAA sites, plus the global from the AGSPs of 1,100) with the current state of play of these and additional components shown in the Site Allocations DM Options Document. The figures should be drawn from the schedule of all sites discussed at the hearing with an explanatory note to make clear what has been added in or excluded from any sub totals in the new summary table.

iii) Assuming the information is easily accessible: the proportion of small sites (less than 10) permitted in each of the last 5 years that were identified as being on residential garden land compared with the total number of small site permissions in each of those years. (Both would exclude conversions). In the light of the figures produced, the Council's comment on whether the changes made to PPS3 to exclude gardens from the definition of brownfield would be likely to make a significant difference to the future trend of permissions for small site permissions. The note may wish to remind all parties of the Council's assumption, as previously set out, of 200 dwelling p.a. from this source in the future.

2.2 It would be helpful if all the above could be provided by midday on Friday 2 July so that I could see it (simply to ensure that it is clearly expressed) before it is circulated by the PO to participants at that sessions for comment. I will be making clear to participants that comments only need be made on any matters arising from the Schedule of SHLAA/SADMOD sites and the new information that could not be made at hearing. If the 2 July date is too tight please let me know. I would then make the deadline when I come back from leave on July 19th. I would aim to give parties no more than 10 days to respond on this.

Council's Response

This information was provided on 20 July (CED115 EX5).

3. Wednesday 23 June Issue 2 (part)

Matters arising from the discussion of flood risk:

3.1 A paper, drawing on the available evidence, which sets out the sequential test to the selection of development locations in the Core Strategy. (Although the discussion focussed on housing, the sequential test is relevant to all planned development). The flood zones to be based on the climate change position as set

out in the SFRA (accepting that some broad assumptions made need to be made about the extent of flood zones with climate change for suburban sites, but the EA may have further information).

3.2 This paper should be finalised in the context of whatever further submissions/possible changes to the housing strategy/contingencies are to be made by the Council for the postponed hearing session, following the further statement regarding the abolition of the RSS.

3.3 To accompany the above, the Council's suggested additional/changed text for the Core Strategy to refer to this new paper and to explain more fully the issues concerning delivery of some potential housing sites in the City Centre with regard to meeting the exception test in due course.

Council's Response

This is addressed in the Council's statement on overall housing provision and the green belt, the paper on the sequential approach and in the Schedule of Potential Significant Changes.

Matters arising from discussion of housing delivery in South Bristol and the City Centre

3.4 A refresh of the South Bristol Position Paper (please add the maps previously done for your statement so as to make a single comprehensive document) which explains how the delivery of housing schemes at Hengrove Park and Knowle West relate to the broad bids in the West of England Single Conversation Investment Plan, as discussed. I want to understand what steps to enable/promote housing delivery are dependent on substantial/external funding so as to come to a view about whether there are reasonable prospects of delivery as anticipated. Please make clear whether public money is needed to actually build the housing numbers referred to or what proportion would be delivered by the private sector.

Council's Response

This information was supplied on 20 July 2010 and is set out in the revised South Bristol Position Paper CDE114 EX4.

3.5 A separate note should briefly list the identifiable schemes for which funds are bid relating to delivery in the City Centre with a plan which relates them (if appropriate) to particular major development sites.

Council's Response

This information is set out below:

There are three City Centre sites on which funds are bid in the Single Conversation Investment Plan. These are as follows:

Stokes Croft:

Development of the Westmorland House site (a derelict 1960's tower block) and adjacent listed Carriage Works. The site requires publicly financed land assembly, probably through a Compulsory Purchase Order, demolition, refurbishment and provision of new workspace and homes. The site would deliver approximately 80 residential units 30% of which would be affordable housing.

Investment required from HCA:

2010 - 2013: £3.5m for acquisition, demolition and refurbishment.

2013 - 2015: £1.5m for affordable housing (AH).

(The RDA was requested to provide £0.5m for employment floorspace.)

Dove Lane:

The site covers 9 hectares at the eastern end of St Paul's. Proposals are to redevelop the site to deliver approximately 392 homes plus 12,500 square metres of small scale retail and employment floorspace within a new enterprise centre providing over 700 jobs.

Public sector investment is required to support the project by funding affordable housing (58 dwellings), improvements to the public realm, the relocation of a primary school and wider master planning.

Investment required from HCA:

2010 - 2013: £3.25m for 30 AH Units and public realm improvements

2013 - 2015: £1.75m for a further 28 HA units

Temple Meads sites and St Philips:

Sites around Temple Meads require public investment to release their development value by increasing connectivity. The proposed infrastructure is as follows:

- **A road bridge to Temple Quay 3 (former Arena Site)**
- **A foot bridge to link Cattle Market Road and Silverthorne Lane**
- **Refurbish and establish a foot tunnel link**
- **Establish 500m of floating walkway**
- **Remove a conveyor bridge link between the station and former Post Office Depot**

Sites north of the Feeder in St Philips require a high level of investigation and master planning. These include studies to ascertain flood risks and mitigations, investigations into land ownership and development potential. This would lead to a consequent development framework that would seek to establish development agreements and briefs.

No investment was requested from the HCA. The RDA was requested to provide £9.25 to fund delivery of road/bridge infrastructure and master plans between 2010 - 2013. Steps have not yet been taken to procure alternative sources of funding.

4 Thursday 24 June Issue 3

4.1 Council to clarify wording in BCS8 and related text

- the overlap (or not) between the 36,000 sq m of office floorspace proposed for district and local centres, including those in South Bristol (as previously clarified) and the 50,000 sq m for South Bristol, to avoid any unintended discouragement for part of this larger figure to be at centres. (This may need a change to BCS1.)
- That not all *existing* PIWAs will be retained/protected, but those to be designated in the Site Allocations and Development Management DPD

(SADMDPD) in the light of the recommendations of the Employment Land Study (ELS) and new evidence/changed circumstances.

Council's Response

This is addressed in the Schedules of Schedule of Potential Significant Changes and Schedule of Minor Changes.

4.2 I indicated that I was concerned about the lack of provision for new industrial and warehousing land (outside Avonmouth) set out in policy BCS8. This concern arises from:

- The recommendations in the ELS, which the Council consider is robust;
- The other evidence of considerable need/demand for this type of land;
- My assessment that practical delivery of suitable land in the vicinity of Nover's Hill and Vale Lane PIWA is much more likely to be at the lower end (5ha) than the higher end of the range (10ha) stated in the policy;
- The acknowledged uncertainty about the supply of new land/additional premises that might come about from new development (infilling) or redevelopment within PIWAs;
- The indication in the SADMDPD that additional allocations for this use are being contemplated by the Council.

4.3 I confirm my request for the Council to consider seriously what could be done to better meet the need indicated in the ELS, including reconsideration of the previously suggested option of a strategic allocation at Brislington in the light of any changed circumstances relating to the urban extension in that area, as discussed at the hearing.

Council's Response

The council has given further consideration to the proposal for an industrial and warehousing allocation to the east of the A4 Bath Road Park & Ride at Brislington. It maintains its view that such a proposal would be inappropriate as it fails to accord with the objective of protecting the Green Belt in accordance with PPG2.

The council also considers that it is relevant to describe the basis upon which the ELS recommendation for 24.5ha of new industrial and warehousing land outside Avonmouth was made. The ELS indicated that there was an adequate land supply to meet both the growth-based forecast and latent demand for industrial and warehousing development in the period to 2026. A negative land requirement of -4.2ha is set out in ELS Table S2. The 24.5ha recommendation was made in order to provide some choice and flexibility to the industrial and warehousing market in areas of the city outside Avonmouth. The 24.5ha figure includes 9.7ha to meet potential latent demand for industrial and warehousing land identified in 2006-2007 when the economy was performing strongly. The recession since mid-2008 and the consequent increase in vacancy levels on a number of Bristol's industrial estates would suggest that the strength of this latent demand may have reduced. Therefore, as with the suggested change to the delivery of office floorspace proposed for Policy BCS8, in the current economic context the council considers that a cautious approach to the provision of new industrial and warehousing land is appropriate.

Nevertheless, the council aims to deliver a significant part of the ELS recommendation. In addition to the land identified by the ELS at Nover's

Vale / Vale Lane, it is possible that further land appropriate for industrial and warehousing development could arise through the Site Allocations and Development Management DPD process, particularly in and around the major South Bristol regeneration areas identified in BCS1. It considers that this could amount to up to 10ha in total.

These points are reflected in the Schedule of Potential Significant Changes. The specific reference to Nover's Hill and Vale Lane is removed, to be replaced with an intention to deliver up to 10ha of industrial land, focused on the main areas of regeneration in South Bristol.

4.4 In relation to policy BCS4 Avonmouth, the first sentence of the 2nd paragraph needs amending to reflect the Council's intention to extend the PIWAs designations to encompass newly built/permitted commercial development (reflected in the emerging SADMDPD). The text at 4.4.4 could be updated to reflect that permission for the port expansion has been granted.

Council's Response

This is addressed in the Schedule of Minor Changes.

5 Monday 28 June Issue 4

Affordable Housing

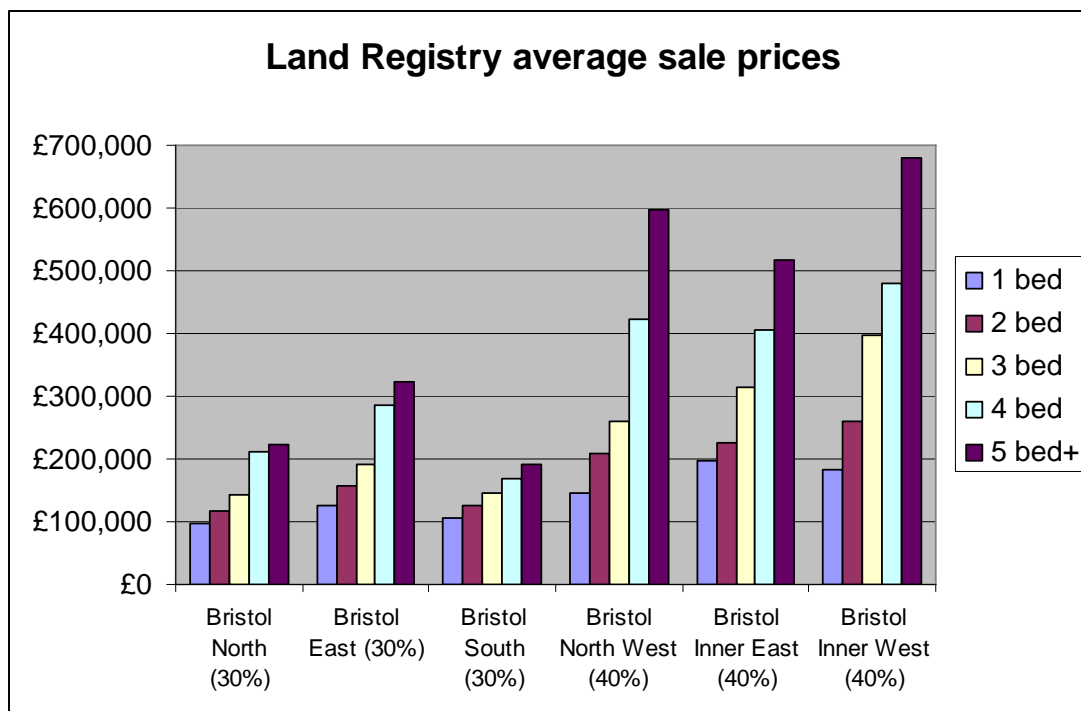
5.1 Drawing on table 2 in the Council's statement on this issue, I am concerned about the low proportion of development assessed as viable in Bristol North West in a no grant situation in the different market scenarios. Council to present similar summary evidence for this zone based on a 30% proportion of affordable housing (I understand the evidence is available to do this). I would also request that the summary evidence for Bristol East be presented with the next lowest % for which evidence is readily available (20%?). The Council undertook to reconsider the boundary of the North West Zone and also wished to re-run the assessment with a different density assumption. The Council will need to explain carefully the latter and if changed in one zone consider whether any density assumptions should be revised elsewhere.

Council's Response

Further evidence has been provided on sales values within the zones and viability scenarios for alternative policy target percentages for the North West and East zones (Core Document CDE117 EV34).

In relation to zone boundaries further analysis of sales values has been undertaken. Fig. 1 below shows the average sales values for 1 to 5 bed properties for each zone in July 2010.

Fig. 1 Average Sales Values by Zone



The analysis indicates that values across all property sizes are generally much higher in the 40% target zones (Bristol North West, Bristol Inner West and Bristol Inner East) than the 30% target zones (Bristol North, Bristol East and Bristol South). The differential in values provides clear evidence for retaining the zone boundaries and the application of differential targets as originally proposed.

In relation to target percentages further analysis of viability modelling outputs has been undertaken for both Bristol North West and Bristol East zones. The results are provided in Table 1 below which shows the proportion of scenarios that would be viable for a given policy target.

Table 1 Summary of weighted results (revised for North West and East zones)

Zone	AH target	2007 market conditions		2009 market conditions	
		% of development scenarios where policy is viable		% of development scenarios where policy is viable	
		With grant	No grant	With grant	No grant
Bristol North West	40%/35% (note 1)	85%	65%	75%	58%
Bristol North West	30%	85%	73%	75%	65%
Bristol East	30% (note 2)	80%	50%	70%	53%

North West results now based on 50 units per hectare (previously 30 units per hectare)

Note 1: a 35% target produces no change in the percentage of viable scenarios

Note 2: a 25% and 20% target produces no change in the percentage of viable scenarios

Bristol North West

The results for Bristol North West reflect a revised density assumption of 50dph. Whilst the density assumptions for all the zones reflected the average densities of residential development coming forward in these

areas, Bristol North West was the only zone where the assumption was less than the minimum density target of 50dph set out in Core Strategy policy BCS20. In the circumstances, the density assumption was raised to better reflect the council's policy objectives. On this basis a re-calculation of the proportion of viable scenarios has been undertaken for both the proposed 40% policy target and for lower policy targets of 35% and 30%.

The results show considerable improvement in the proportion of viable scenarios with the change in density assumption. The council considers that sufficient improvement has been demonstrated against the 40% target to justify its retention. The higher property values in the Bristol North West zone, as shown in Fig. 1, also provide a strong justification for the retention of the 40% target.

Bristol East

The proportion of viable scenarios have been calculated for lower policy targets of 25% and 20%, however the results show no improvement at these levels. In the circumstances, there is no justification for lowering the policy target for this zone. The council are concerned that a lower target would result in lost opportunities to secure higher levels of affordable housing from schemes that would be viable at the 30% target level.

5.2 Council to indicate when this further evidence will be available. Participants will be given the opportunity to comment.

Council's Response

This information was provided on 27 July and is set out in Core Document CDE117 EV34.

5.3 I indicated that (as a minimum) I would endorse the changes already suggested by the Council to the wording of the policy.

Council's Response

These changes are set out in both the Schedule of Potential Significant Changes and the Schedule of Minor Changes.

In addition a target figure for affordable homes has been inserted in the Targets/Indicators section of the policy. The calculation of the target reflects the revised housing provision total and the affordable housing percentages sought. If these are changed the target figure will need to be amended.

The indicators have also been expanded to provide more sophisticated monitoring of policy performance.

5.4 I expressed concern at the open-ended nature of the requirement for a financial contribution to schemes of fewer than 15 units and at the principle of requiring any such contribution from a single additional dwelling. Council to consider how this should be resolved eg policy in SADMDPD enabling further examination in the light of more detailed work yet to be done.

Council's Response

Further viability work will be undertaken to support any future policy approach to small sites (under 15). Such a policy may come forward through the Site Allocations and Development Management Policies DPD. Additional wording has been provided in the policy and explanatory text to reflect this intention (see Schedule of Minor Changes).

5.5 If, as suggested by the Council, the proportion of affordable housing to be sought from a particular allocation may be varied from that in the Core Strategy (via requirements in the SADMDPD) then this possibility should be flagged now.

Council's Response

The council is not proposing to vary the levels of affordable housing sought from particular site allocations from that sought through the Core Strategy.

Housing Mix

5.6 Council to review the considerations listed in BCS18 to provide a clearer steer of intentions (the direction of travel to be taken in the light of the evidence on different topics). Also, whether local area could be explained in relation to the availability of relevant data at different spatial scales.

Council's Response

The policy criteria and explanatory text have been re-worded to provide a clearer steer of intentions (see Schedule of Minor Changes).

Further changes have also been made to the explanatory text relating to the definition of geographical boundaries in connection with the policy criteria (see Schedule of Minor Changes).

Gypsies, Traveller and Travelling Showpeople

5.7 Council to consider additional text to explain intended delivery mechanisms and the need for the policy criteria to be interpreted more flexibly if need is not met through planned allocations. I also indicated that the policy should recognise that needs will arise and should be met beyond 2011.

Council's Response

Text has been included within the Policy Delivery section to acknowledge that the City Council is exploring the possibility of the delivery of sites (to meet identified need for the period to 2011) on council owned land.

Owing to the change in Government position regarding Gypsy & Traveller site provision text has not been included to state that the policy criteria need to be interpreted more flexibly if need is not met through planned allocations and the policy has not been amended to recognise that needs will arise and should be met beyond 2011. As the DCLG advised on 6 July local councils are best placed to assess the needs of travellers and are not bound by GTAA's. It is understood that the government will review relevant regulations and guidance on this matter in due course and it is considered premature to commit to Gypsy & Traveller site provision for the period post 2011 at this stage when the content of the future guidance is unknown.

6. Tuesday 29 June Issue 5 Centres

6.1 Council to show Kingswood as a town centre serving part of the City in the table of centres in policy BCS7, and note that part of the centre extends across the boundary into the City. Kingswood to be included on Key Diagram. Please check whether Staple Hill should be shown similarly.

Council's Response

The table has been amended to indicate that Two Mile Hill Road forms part of Kingswood town centre (Schedule of Minor Changes).

The edge of Staple Hill town centre in South Gloucestershire is located around 400 metres from the boundary of the city (see CDE82 NA4 South Gloucestershire Local Plan Proposals Map Inset Map 4). Whilst the centre may provide services to people in Bristol, it does not cross the boundary in the manner of Kingswood. It remains appropriate to acknowledge it in the table in policy BCS7 but no change to the Core Strategy is required.

6.2 The locations for the expansion of the City Centre in BSC2 to include the location of the previously proposed Arena site. Sentence: *Development will include* to be moved to immediately after 1st sentence of policy to confirm that it applies to the city centre as a whole.

Council's Response

This is addressed in the Schedule of Minor Changes.

6.3 Consider whether the purpose/role for the gateways can be more fully identified (to assist delivery).

Council's Response

The Council considers that the approach to continued improvement in the gateways is sufficiently clear to provide a basis for further work in the Bristol Central Area Action Plan. It is suggested that the key diagram legend is changed to refer to 'Improvement of City Centre gateways' to more closely accord with the policy wording.

6.4 On City Centre Key Diagram, delete the triangular area relating to the rail depot/sidings within the St Phillips Marsh town centre expansion area; add the location of the previously proposed Arena. Consider whether any greater clarity on this diagram or the key diagram or explanation in the text is required to make clear that the overall boundary of the AAP encompasses but is not necessarily the same as the City Centre policy boundary which it will define.

Council's Response

The changes are set out in the Schedule of Minor Changes.

6.5 Consider whether in the light of the conclusions in the *South Bristol Retail and Centres Study* (CDE94) revised wording is appropriate in relation to the possibility of a new centre for South Bristol. Current wording implies a possible larger centre/role than now seems intended or likely and its role as a focus may be limited eg a possible new centre primarily to serve the area of Knowle West

and its immediate surroundings. The specific blob on the key diagram might better be shown as a much wider indicative area of search around Knowle West.

Council's Response

The reference to the role of the potential new centre has been revised.

The Key Diagram is changed to indicate that industrial land and a potential new centre will be focused on the main areas of regeneration.

6.6 (I will need to reflect on whether any greater clarity arising from the above and from any revisions to the wording relating to office development sufficiently meet my previously expressed concern about lack of a spatial steer on these matters in South Bristol.)

Wednesday 30 June Issue 6

Transport

7.1 Further information to be provided:

- Details of current Cycling City proposals eg proposals for a cycle route along part of the route of the Callington Link and any similar planned schemes.
- The previous study for a cycle route alongside the main railway at Filton Bank.
- SPD4.

Paper copies to me by 19 July (if possible) and made Core Documents. As these documents were highlighted by participants to support points made, I see no need for any consultation back with participants unless I have further questions.

Council's Response

This information was provided on 20 July – CDEs 111, 112 and 113.

7.2. Council to consider revised wording for policy BCS10 and/or text to explain more fully/clearly:

- What would be the transport solutions/consequences/priorities if anticipated funding to deliver the identified major schemes during the life of the Core Strategy were to be substantially reduced.
- Itemising in the policy the well established distinct rail projects consistent with way they are being advanced for funding and shown in the IDP;
- Identifying any further aspirations for the rail network (eg safeguarding of the potential for reopening of stations/infrastructure) consistent with emerging cross boundary approach and as shown already in part on the Key Diagram;
- Whether 3 or 4 tracking of part of the line between Temple Meads and Parkway (as identified in the Network Rail RUS) is sufficiently critical to the delivery of the combination of rail projects such that its *safeguarding* (rather than being a proposal) should be specifically flagged;
- Adjusting the key diagram so that it shows the transport elements of the *proposed strategy* in a consistent way across all modes. (Examples include: not *existing rail network* but Greater Bristol Metro, not *no passenger service*, but Portishead rail corridor.);
- Prefacing the order of priority of different modes listed in BCS10 with the phrase: *without prejudice to the implementation of the major transport schemes listed above, proposals will* (or similar);

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- Deleting from the sequence of priorities *disabled people* since their needs should be fully recognised and incorporated in all schemes.
- Whether the safeguarding of existing transport facilities such as rail and bus depots essential for the operation of existing and future services needs to be referenced in the policy and not just in the text (pre submission minor change C4.10.10).

7.3 The above list reflects only those matters I expressly requested/Council accepted should be looked at again. There were other matters discussed on which I do not comment further at this stage.

Council's Response

With the exception of bullet 4, all the matters set out in paragraph 7.2 are addressed as clarifications in the Schedule of Minor Changes.

With regard the line between Temple Meads and Parkway, it is understood that the land required for the improvements referred to would be located within the rail corridor controlled by Network Rail and therefore does not require safeguarding.

Green Infrastructure

7.4 I will consider these matters in due course.

Developer Contributions

7.5 Policy BCS11 to have 2 clear bullets on the type of contributions that will be sought related to the different statutory basis for collection. (The precise wording may need to evolve during the Examination to reflect any Government announcement in relation to the future of CIL). Is the last sentence of the policy necessary? There are other matters for me still to consider.

Council's Response

This is addressed in the Schedule of Potential Significant Changes.

7.6 In policy BCS12 and related text, Council to consider term community *facilities* rather than infrastructure to distinguish particular purpose of policy. If the first sentence of the policy is deleted as the Council suggest, the first 2 sentences of 4.12.5 also need deleting. Council to consider the last sentence being part of policy (wording may need amending).

Council's Response

This is addressed in the Schedules of Minor Changes.

Thursday 1 July
Climate Change

8.1 Council to provide the note prepared on political/cultural context as discussed and any other evidence which indicates specific local circumstances that facilitate delivery of accelerated CSH standards. Council to also indicate the number of dwellings (ie those not yet granted permission) likely to be subject to this policy prior to the 2016 in accordance with expected housing delivery shown in the trajectory. *Can this material be provided by 19 July?* Any further evidence will be shared with participants for comment. I remain concerned that the

justification for the requirements in the 2nd part of policy BCS15 does not meet the tests set out in national policy (PPS1 Supplement on climate change).

8.2 Policy BCS14

Council to consider:

- an explanation in the text of the environmental and economic benefits referred to in the policy;
- whether the policy would be clearer if it referred to the hierarchical approach set out in 4.14.8;
- (new question) whether a threshold for the size of housing schemes should be set in relation to district heating etc;
- Text to be updated as the Examination progresses in relation to any decision setting up a ESC or the outcome of the bid for European funds.

Council's Response

The requested additional documents have been added to the Core Documents list and were supplied to the Inspector on 13 August.

Policy BCS15

The dwellings that would be subject to the Code for Sustainable Homes targets set out in Policy BCS15 as submitted would be those consented between the adoption of the Core Strategy and 2016 and completed prior to the anticipated changes to the building regulations in 2016. Broadly, assuming that the Core Strategy were to be adopted in early 2011, this can be estimated by taking the expected delivery of housing between 2011 and 2015 from the revised housing trajectory set out in the council's suggested changes to policy BCS5. Approximately, this amounts to the following:

	Approx. Completions
2011/12	1,900
2012/13	1,600
2013/14	1,100
2014/15	1,500
2015/16	1,200
Total	7,300

Up to 7,300 homes that could be affected by the targets in policy BCS15, which would represent a substantial proportion of Bristol's overall expected delivery. However, the figure is likely to be an overestimate, due to the completion over this period of committed schemes consented prior to the adoption of the Core Strategy.

The council continues to consider that it would be sound and appropriate to apply increasing Code for Sustainable Homes and BREEAM standards over this period. Without prejudice to this position, alternative wording for Policy BCS15 has been provided to reflect the Inspector's concerns about the justification for the local requirements for sustainable design and construction:

- Should the Inspector not be minded to support increasing standards to 2016 against the Code for Sustainable Homes and BREEAM methodologies, it is suggested that the table of increasing

targets be deleted. However, the council suggests that it would be reasonable under these circumstances to retain the requirement for residential development to achieve Code for Sustainable Homes Level 6 by 2016, as this reflects the national trajectory for zero carbon homes. A requirement for BREEAM "Excellent" by 2016 is suggested to provide a clear and consistent approach and to ensure that non-residential development also incorporates appropriate standards of environmental performance.

- Should the Inspector not be minded to support the retention of the requirement for Code for Sustainable Homes Level 6 and BREEAM "Excellent" by 2016, the council considers that it would be desirable and consistent with the direction of national policy to maintain a requirement for Code for Sustainable Homes / BREEAM assessments to be undertaken for major developments, without setting specific targets. Doing so would ensure that developers engage effectively with the sustainable design and construction issues set out in the first part of the policy, which would itself raise standards, without introducing an onerous requirement that might threaten scheme viability. As part of this approach, in the interests of keeping the policy up to date, it is considered that an additional requirement could be introduced for a BREEAM for Communities assessment to be undertaken for the largest schemes.
- Should the Inspector not be minded to support this reduced requirement, the council would like to draw attention to the benefits that retaining the rest of the policy would offer. The criteria set out in the first part of policy BCS15 provide a statutory basis for the proposed SPD on sustainability and climate change mitigation and adaptation, while the elements of the policy that appear after the deleted table of standards provide the Core Strategy's principal basis for delivering higher standards of digital connectivity and refuse and recycling storage in new development.

Policy BCS14

Amendments have been suggested to Policy BCS14 that clarify its implementation. The amended policy also includes a minimum size threshold for the District Heating requirement as suggested by the Inspector. In respect of the setting up of an ESCo and the bid for European funds, this remains a priority but is not sufficiently advanced to update the text of the Core Strategy at this time. In short, however:

- The council has been invited to submit a formal bid for ELENA funding from the European Investment Bank in September, and a decision will be made by the end of the year.
- The ELENA application and the ESCo project are being taken forward in tandem, and a report will go to Cabinet for approval of both initiatives at the end of September.
- More development and technical work is being carried out over the summer (with support from CSE).
- If successful, ELENA will provide £400 million to fund: district heating; photovoltaics; renewable and low carbon energy in public buildings; retrofitting housing stock.

Density, design and conservation

8.3 Council to consider:

- Prefacing policy BCs20 with *where built development is to take place in accordance with this strategy* (or similar)...
- If Diagram 4.20.1 is retained to add: *it does not take into account changes in accessibility that will arise from the implementation of planned major transport schemes.*

Council's Response

Bullet point 1: Change made to policy wording (see Schedule of Minor Changes).

Bullet point 2: Diagram 4.20.1 to be retained. Change made to policy wording as suggested by the Inspector (see Schedule of Minor Changes).

Additional change made to policy wording to address question 8.4 of 'Inspector's Final Main Issues for Examination, Comments and Questions' (see Schedule of Minor Changes).

8.4 I expressed strong concern about the pre-determination aspects of setting out specific scores that have to be met under the *Building for Life* process (given that only qualified assessors are able to determine such scores). As written, the failure to meet the required score would mean that a scheme was in conflict with development plan. The decision maker would not be able to come to their own judgment of policy compliance.

Council's Response

The policy has been amended to address this point and the change is set out in the Schedule of Potential Significant Changes.

8.5 In the additional text suggested by the Council, consistently use the word *inform* in relation to the role of the urban context analysis to the City Centre AAP.

Council's Response

This is addressed in the Schedule of Minor Changes.

8.6 Council to include targets for the indicators under policy BCS21 which indicate a clear direction of travel.

Council's Response

This is addressed in the Schedule of Minor Changes.

8.7 As a result of this and other discussions Council to review appropriateness of policies to be superseded to ensure that no gaps emerge in policy coverage prior to the adoption of the SADMDPD

Council's Response

The Council has reviewed this matter. Two additional policies were identified as being appropriate for saving until the adoption of the Site Allocations and Development Management DPD. These have been deleted from the list in Core Strategy Appendix A as shown on the Schedule of Minor Changes.