

Bristol Core Strategy Examination 2010

Bristol City Council's Response to Inspector's Initial Questions

1. This document sets out the Council's response to the Inspector's initial queries in the examination of the Bristol Core Strategy. Most of the information requested is set out below. This should provide clarification on most of the issues raised. Further time is required to assemble the remaining information requested and this will be supplied before 11 May.
2. Three issues appear to raise the most fundamental concerns:
 - The working assumption of a housing figure of 36,500
 - Green belt and urban extensions
 - The fixing of a location for a potential new centre in South Bristol
3. These issues are discussed below, ahead of the detailed point by point response to the Inspector's questions which follows in Table 1.
4. Various documents have been added to the list of core documents as part of the response to the questions. These are set out in Appendix 1.

Housing figure

5. Table 4.5.2 of the Published Core Strategy (CDE29) summarises the emerging proposals for housing provision in Bristol. The figure of 36,500 dwellings was set out in the Secretary of State's Proposed Changes (CDE50). The Proposed Changes were published for consultation which ended in October 2008. About 35,000 responses were received during the consultation period.
6. The evolving proposals for housing provision, including the indicated distribution between urban area and areas of search is set out in the table below:

	Draft RSS	RSS Panel Report	RSS Proposed Changes	Core Strategy
Urban Area	26,500	28,500	33,500	30,000
Area of Search A (SW Bristol)	1,500	1,500	1,500	-
Area of Search B (SE Bristol)	-	-	1,500	-
TOTAL	28,000	30,000	36,500	30,000

7. The Council does not consider that the use of the Secretary of State's figure as set out in Proposed Changes (CDE50) is a straightforward default position for progressing the Core Strategy. That figure represented an increase of 30% on the draft Regional Spatial Strategy and a 21% increase on the level of 30,000 recommended by the Panel which reported on the draft RSS. The Secretary of State's published reasons (CDE51) for the increased figure were not supported by evidence of how the additional housing delivery was expected to be derived¹. The Council queried the figure at the time of Proposed Changes (See letter at Appendix 2). Evidence of the basis for the figure has been sought but none was provided.

¹ The Secretary of State's reasoning for increasing the level of homes identified for Bristol was set out in the The South West Regional Spatial Strategy: Schedule of the Secretary of State's Proposed Changes and Reasons - July 2008 (CDE51). On page 76 the schedule said '*Specific reasons for the increase in housing are....Bristol Urban Area to take account of and provide an impetus for major regeneration in the central area and South Bristol and to make use of previously developed land...Area of Search 1B - to respond to representations including with regard to the programming of development areas submitted in relation to Panel Note 2.*'

8. Following the quashing of elements for the East of England Regional Spatial Strategy by the High Court, preparation of the RSS for South West England is stalled². Further sustainability appraisal work is being carried out. At the time the Core Strategy was published there was little prospect that the RSS would be issued. At Submission it had still not been published. Even if there is no change of Government it is unlikely that the RSS will be published for some time. Given the concerns the Proposed Changes raised, there remains a clear prospect of high court challenges. If there is a change of Government it is questionable whether the RSS will be issued at all.
9. Further uncertainties arise from the approach to urban extensions from the neighbouring local authorities within whose areas the majority of 'area of search' for urban extension lies. More information on the approach of those authorities is included in the detailed response in Table 1.
10. Given these fundamental uncertainties, the Council has proceeded with caution and having full regard to the advice in PPS12, in particular:
'The need for frequent updating may be reduced by taking a long-term view and providing some flexibility. So for example, if a strategy has some room for manoeuvre, it should not need to be updated simply because there has been a change in the housing numbers in the regional spatial strategy.'
11. The Council tested the impacts of the Secretary of State's housing figure in the Preferred Options Review of February 2009 (CDE44). This illustrated the challenges of delivering high dwelling numbers in a constrained urban area. In these circumstances headroom for housing delivery clearly decreases as housing targets increase. A 20% increase in housing stock over 20 years would be a challenge in areas with underdeveloped hinterlands – it is exceptionally so in an urban area where options for green field development are minimal.
12. The Council is eager to progress its suite of LDF documents. In order to progress the Core Strategy in the continued absence of the final RSS, the Council has proposed an approach which is based on a tested level of housing provision. That figure reflects the EIP Panel Report (CDE52) recommendation of 30,000 homes and was the approximate level set out in the Core Strategy Preferred Options of

² From GOSW web site – *'The Secretary of State intended to publish the final Regional Spatial Strategy at the end of June. However, on the 20 May, the High Court issued a judgement that the previously issued Regional Spatial Strategy for the East of England has failed to meet certain requirements of the Strategic Environmental Assessment Directive, in respect of three towns. The Department of Communities and Local Government and the Government Office for the South West have considered the implications for the Regional Spatial Strategy for the South West. The Government announced on 25 September 2009 that it will carry out a further appraisal of whether its proposals for the Regional Spatial Strategy for South West England are the most sustainable way forward for the region. The Government wishes to be satisfied that the Sustainability Appraisal of last year's Proposed Changes to the SW RSS tested reasonable alternatives to those Areas of Search for strategic housing, business and other development which were added or amended following consideration of the EIP Panel's report. In the light of the Appraisal's findings, the Government will then decide what action to take to complete the SW Strategy to provide the clarity and certainty about the future framework for growth in the region'*

January 2008 (CDE43). In recognition of PPS12's advice, contingencies for delivery of higher levels of delivery have been built in to the submitted Core Strategy.

13. The approach arrived at was carefully considered. It was explored with the Advisory Inspector. Whilst the Advisory Inspector's comments do not have any binding impact on the current examination process, it was appropriate for the Council to take soundings in this way. The Advisory Inspector's advice was thorough and caveated. She said:

'The RSS has not offered the certainty and strategic guidance which Bristol needs; Bristol is substantially built-up within its boundaries and has to be innovative, flexible and alert to plan for even the lower levels of growth which have been proposed. I am satisfied that the Council has the basic evidence to produce a DPD with suitable provision and contingency plans to meet the challenge' (CDE39 Page 64)

14. The principle of the Core Strategy's approach was also been explored in consultation with the Government Office. In its comments on the published Core Strategy GOSW said:

'We note the pragmatic approach taken re the overall number for housing in the RSS. This is not an ideal solution for us, but in the circumstances of a stalled RSS the approach is acceptable.' (CDE36 Page 40)

15. It is also noted that the Regional Planning Body has not raised issues of conformity in respect of the published Core Strategy (CDE36 Page 37). The approach was also explored with stakeholders at a meeting in September 2010, as part of the process of continuous involvement with the community.
16. It is acknowledged in the unusual circumstances of the stalled RSS, the Council's pragmatic approach to the overall housing numbers requires thorough testing through the examination process. The Council considers that it has a sound and evidence based case to support the position and that the approach taken enables progress to be made in the planning of the area whilst maintaining due flexibility.

Potential Centre in South Bristol

17. The detailed response to the Inspector will demonstrate that a spatial steer is given to the development of offices in South Bristol. However, the regeneration of this large area raises complex issues. It is not possible for all those to be finally determined in this Core Strategy. The Core Strategy's approach is to set out the overall vision, identify the broad locations for regeneration and indicated the mechanisms through which regeneration will be achieved. In particular, it is not possible for the Core Strategy to resolve finally on the scale and location of a potential new centre. Policy BCS1 acknowledges this and shows the mechanisms through which the issue will be

addressed. A study commissioned from GVA Grimley has recently provided some draft findings on the potential for such a centre and possible locations. This can be progressed further in the emerging Site Allocations Development Plan Document and in the context of the Knowle West Regeneration framework.

Green Belt and Urban Extensions

18. The approach to these matters is influenced by the approach to the stalled draft RSS. The Council's position is that urban extension development of 1500 homes in southeast Bristol is a contingency for delivering a level of homes greater than its planned 30,00 minimum. The principle of development in this location is, therefore, accepted with caveats and the location is broadly indicated on the Key Diagram. The possibility of an urban extension at this location was considered in the Preferred Options Review and was subject to sustainability appraisal. Page 118 of the published Core Strategy (CDE29) explains that the trigger for this contingency would be publication of the RSS with a housing figure greater than 30,000 and including identification of land in southeast Bristol. Setting aside the considerable uncertainties about the RSS, this means that the proposal could be taken forward shortly after RSS confirmation.
19. In southwest Bristol, the Council does not consider that there is sufficient potential capacity to identify land as a contingency for an urban extension. The lack of capacity is demonstrated in the report of February 2010 (CDE28). Potential development land would be unlikely to deliver more than 500 homes, 1.3% of the Secretary of State's proposed housing allocation. The possibility of urban extension development in SW Bristol was explored in the Preferred Options of January 2008 and was subject to Sustainability Appraisal processes.
20. The Published Core Strategy does not prevent the use of land outside the city boundary for development of urban extensions. It fully acknowledges that these may occur (Core Strategy Policy BCS6), although it does not commit strongly to them because their development remains uncertain and is contested by the relevant local planning authorities (although joint working is taking place as our additional evidence will further demonstrate). It would be inappropriate for the Core Strategy to prejudge the content of the Core Strategies of the neighbouring authorities. It has therefore adopted a flexible approach which allows for urban extensions should they be confirmed but allows the delivery of development within the rest of the city to progress.

Table 1. Detailed Response

	Inspector's comments and questions	Bristol City Council Response
1.		
1.1	<p>I am at an early stage in my preparation and I have not read all the background documents. But I have identified some matters about which I am concerned and some matters on which clarification would be helpful prior to identifying the main issues on which the Examination will focus and the questions for discussion at the hearings. I have highlighted in <i>italics</i> those parts of this note which raise questions for the Council. These questions focus on housing delivery and employment. I may have further preliminary questions on other matters in due course. I express a preliminary view on some matters so as to alert the Council to the possibility that further evidence or changes to the submitted Core Strategy may be required to make it sound. I do so in a spirit of openness, but without prejudice to my final conclusions on soundness</p>	
1.2	<p>It would be very helpful to receive an initial response to the specific questions highlighted by Thursday 29 April so I can take them into account in preparing my draft issues and questions prior to the Pre-Hearing Meeting (PHM). If any questions cannot be answered by this date, please do not delay the response to the others. The Council should indicate</p>	

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	<p>whether my questions prompt the undertaking of any more detailed work and when that would be available. I will ask the Programme Officer to put this note and, in due course, the Council's responses on the Core Strategy Examination page of the Council's website</p>	
1.3	<p>If the answers to my questions are to be found in the material submitted with the Core Strategy please provide specific references. If reference is made to other documents please provide me with a hard copy and add a link to the document on the Council's relevant webpage</p>	<p>Reference to submitted documents and additional core documents are included in the Council's response below.</p>
2	Delivering an adequate supply of housing and the relationship to the emerging RSS	
2.1	<p>Policy BCS5 aims to deliver a minimum provision of 30,000 dwellings to 2026 with contingencies to deliver more if required.</p> <p>The Secretary of State's proposed modifications to the emerging Regional Spatial Strategy (RSS) indicate that Bristol should deliver 36,500 dwellings to 2026 with 3,000 of these as part of 2 urban extensions which straddle the boundaries with North Somerset and Bath and North East Somerset (BANES)</p>	<p>This interpretation is not completely accurate in reflecting the wording of the Regional Spatial Strategy Proposed Changes July 2008 (CDE50). Policy HMA1 refers to the <i>'provision of homes at Areas of Search'</i> and indicates that housing growth will comprise, amongst other things, <i>'9,500 new homes at Area of Search 1B (of which 8,000 within Bath and North East Somerset and 1,500 in Bristol)'</i> and <i>'10,500 new homes at Area of Search 1A (9,000 within North Somerset and 1,500 in Bristol)'</i>. Policy HMA1 does not specify any number of urban extensions to be provided nor indicate whether these are expected to straddle boundaries. At paragraph 4.1.12 the preamble to Policy HMA1 says <i>'Substantial amounts of new housing will be required, provided for both within the existing urban area and at a number of urban extensions. These should be sustainable communities, within a revised green belt, fully integrated into the existing urban area. There is considerable potential for urban extensions to the south west and southeast of Bristol, including land in the City of Bristol administrative</i></p>

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		<p><i>area, which can support and complement the regeneration of South Bristol'. Again, no specific number of urban extensions is mentioned.</i></p> <p>It is also noted that the Secretary of State's figure for Bristol City Council's area was sub-divided into three broad elements – 3,000 were to be in areas of search for urban extensions. 33,500 were identified as being within the urban area of Bristol. Having regard to the reasons for the increase set out in the Secretary of State's schedule of July 2008 (see above), it appears that there was an expectation for the additional 7000 new homes to be delivered within the existing built up area, and in particular in central Bristol and south Bristol.</p>
2.2	<p>PPS3 (paragraph 53) is clear that Local Development Documents should identify broad locations and specific sites that will enable the continuous delivery of housing for 15 years from adoption, taking into account the level of housing provision set in the RSS. Where the RSS is under review, local planning authorities are advised to have regard to the level of provision in the emerging RSS. Given that the emerging RSS has reached the stage of proposed modifications, I consider that considerable weight should be given to its housing figures, notwithstanding that further progress has been delayed whilst the Sustainability Appraisal underpinning the proposed modifications is reviewed</p>	<p>The Council's approach to the overall housing provision figure is explained above. It is considered inappropriate to attach considerable weight to the figure in the light of the considerable uncertainty surrounding the stalled draft RSS. This issue has been a matter of some debate. A letter from the Government Office for the South West dated 21 December 2009 said:</p> <p><i>'Implications for planning decisions and LDFs</i></p> <p><i>In relation to individual planning decisions, our advice remains that the Proposed Changes to the RSS are likely to be 'material considerations' for any planning decisions bearing on development envisaged in the Areas of Search, or otherwise covered by RSS policies. How much weight to give each policy or proposal is a matter for decision-makers, and this will need particular consideration in cases relating to an Area of Search proposal added or amended at the Proposed Changes stage.</i></p> <p><i>For LDFs, our advice remains that there is no need for the RSS to be issued before progress on Core Strategies can be made. If you have identified particular policy risks in the relationship between the RSS and your Core Strategy, I suggest your planners speak to GOSW's Senior Planning Manager covering your area'</i></p>

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2.3	<p>In my view, the Core Strategy must enable the delivery of the level of housing that is specified in the RSS when it is finally approved and, for the present, the working assumption must be that this level is 36,500. It must also have due regard to any spatial steer given in the RSS for how that housing should be delivered. The spatial steer in the emerging RSS is for urban extensions straddling administrative boundaries with the largest part of the extensions in the areas of the adjoining authorities. I would thus expect to see clear evidence of joint working with those adjoining authorities to achieve delivery as envisaged in the emerging RSS. Any alternative strategy for providing the overall numbers required by the RSS should be agreed between the authorities with convincing evidence that it would represent a more sustainable approach whilst still meeting national and regional policy objectives</p>	<p>The suggested discussions regarding the Core Strategy have taken place.</p> <p>This is discussed above. The Council has had full regard to the emerging, now stalled, draft RSS in the preparation of the Core Strategy. PPS12 does not indicate that a Core Strategy must enable the delivery of housing specified in a draft RSS when it is finally approved. It makes specific reference to flexibility to responding to changes in RSS numbers. It is perhaps questionable whether it had envisaged a 30% variation in housing levels and, understandably, it does not provide specific information on the unusual circumstances of a stalled RSS.</p> <p>The specific wording used in the RSS has been clarified above (2.1).</p> <p>Evidence of joint working has been provided in a separate document which has been added to the Core Document list (CDE54). The document is supplied in electronic form.</p>
2.4	<p>I have looked only briefly at the Preferred Options Review (February 2009), but it appears to have explored fairly comprehensively how the proposed modifications to the RSS could be delivered. The submitted Core Strategy represents a considerable retrenchment from that earlier document. Paragraphs 4.5.10 and 4.5.11 appear to be the only explanation for this</p>	<p>The Preferred Options Review (CDE44) explored possible responses to the Secretary of State's Proposed Changes (CDE50). The published Core Strategy was not a retrenchment from that document. It represents a flexible response to the stalled RSS as explained above, allowing progress to be made, whilst retaining flexibility to respond to further change.</p> <p>Within the Core Strategy the approach to housing numbers and the relationship with the RSS is explored in paragraphs 4.5.1 to 4.5.8. The housing planned for is further explained in paragraphs 4.5.9 to 4.5.11. Contingencies are discussed in paragraphs 4.5.12 to 4.5.16. Policy delivery is explained in the shaded box on page 51. That section refers to the</p>

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	change. <i>Is further explanation or justification set out anywhere else?</i>	monitoring section starting on page 117 of the Published Core Strategy. Paragraph 5.5 and Table 5.1 set out the triggers for delivery from the contingency sources and the mechanisms through which they would be delivered.
2.5	I will need to explore at the hearings whether a contingency approach is appropriate <u>in principle</u> . But even if it is, my preliminary view is that the wording of the contingency section of policy BCS5 is far too tentative and lacking clarity to ensure that delivery would take place in accordance with the principles in PPS3. I set out below some specific questions and comments on each of the 3 contingencies, based on the working assumption that the RSS is approved in accordance with the published proposed modifications	It is considered that the approach in BCS5 is clear and delivery oriented as explained below. The Council agrees it is appropriate to explore these matters in the hearings, given the unusual circumstances.
2.6	The Council's first preference is delivery from small sites/subdivisions (sites of less than 10 units which were not captured in the SHLAA process). Paragraph 4.5.13 indicates a contribution of 4,500 from this source, which are not to be relied on until 2021	It is noted that in raising the proposed level of housing for Bristol, the Secretary of State envisaged the majority to arise from regeneration in the central area and South Bristol and making use of previously developed land (CDE51 Page 76). This would suggest a clear preference for a previously developed land led approach maximising efficiency of urban land. The Council's preference for delivery from this source is consistent with the Core Strategy's aims and appears consistent with the Secretary of State's thinking.
2.7	<i>I am unclear whether this figure represents anticipated small site windfalls in the period 2021-2026 or the banking of anticipated permissions between now and 2021. Please explain clearly, showing the calculations and assumptions used. PPS3 (paragraph 59) makes clear that windfalls should not be counted as part of the housing supply for the first 10 years other than in particular circumstances. Nevertheless, as background</i>	New small site windfalls would arise throughout the plan period. The contribution would represent a banking of the figure from 2011 to 2026. At a housing provision level of 30,000 they would not need to be relied on to deliver the level of new homes (but would offer a useful contingency reserve). At 36,500 they would need to be relied on. They would have to count towards supply from 2021 onwards. The level of windfalls has been calculated on a cautious basis as set out below. The overall level represents a likely realistic future contribution. The calculations are based on past trends but have regard to the potential for a reduction in future rates. It is acknowledged that sites may not come forward as they did during the peak of the housing market – it is also

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	<p><i>information, please indicate what the Council consider to be a realistic contribution from small site windfalls over the plan period. (These may not come forward in the future at the same rate as when the housing market was at its peak as the difference in value between new residential development and existing uses may no longer be so great.)</i></p>	<p>observed that the housing market could conceivably perform strongly again during the plan period.</p> <p>Subdivisions</p> <p>The annual average net completions from subdivisions was 178 per year between 1996/97 and 2008/09. The assumption for subdivisions is based on 100 dwellings per year being developed over a fifteen year period 2011 to 2026 which would result in 1,500 additional dwellings. The first five years were not included to help avoid duplication of numbers with sites which already had planning permission.</p> <p>Sites under ten dwellings</p> <p>The annual average gross completions on sites under 10 dwellings was 517 per year between 1996/97 and 2008/09. The assumption for sites under 10 is based on 200 dwellings per year being developed (taking into account some losses) over a fifteen year period 2011 to 2026 which would result in 3,000 additional dwellings.</p> <p>It has not been possible to be geographically specific about the likely future location of small sites and subdivisions. The geographic distribution of this source will depend on a range of factors, including the existing built form and tenure of areas, the capacity to sub-divide or convert buildings, future local housing markets, level of council housing and opportunity sites arising.</p>
2.8	<p>PPS3 (paragraph 55) indicates that where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. I am aware that many Core Strategies have been found sound with an element of small site windfalls contributing to supply in this last 5 year period, but PPS3 is</p>	<p>Broad locations are identified within the set of contingencies. Principal Industrial and Warehousing Areas, although occurring across the city, are established locations which will be shown on the Proposals Map to be adopted with the Site Allocations and Development Management DPD. An urban extension at SE Bristol is identified as another broad location.</p> <p>The Council does not consider that there are other broad locations which could realistically be used as contingencies.</p>

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	<p>clear that the focus should be on the consideration of broad locations. Given this advice, I would need convincing reasons why broad locations have not been identified ahead of a contribution from small site windfalls. <i>What steps have the Council taken to identify potential broad locations to assist delivery in the last 5 year period (or earlier) and the potential of such areas?</i> I note that the SHLAA (2009) excluded the assessment of sites in the Green Belt (as well as sites affected by other constraints - paragraph 9.1). The Green Belt may be one such "broad location", irrespective of whether there are to be urban extensions</p>	<p>There are a few relatively limited areas of designated Green Belt within the city boundary. To identify the Green Belt in general as a broad location for delivery of homes is likely inconsistent national planning policy in PPG2 and with the draft RSS.</p> <p>PPG2 says: <i>'Green Belt policies in development plans should ensure that any planning applications for inappropriate development would not be in accord with the plan'</i> (paragraph 3.3)</p> <p>Policy HMA1 of the draft RSS says: <i>'The general extent of the Bristol and Bath Green Belt will be maintained subject to the following alterations: removal of the green belt between the Royal Portbury Dock and the M5 motorway, having regard to development needs of the Royal Portbury Dock removal of the green belt at Bristol International Airport, having regard to the development needs of the airport; removal of the green belt to accommodate urban extensions at Areas of each A, 1B, 1C, 1D, 1F and 1G.'</i> The policy does not provide for development of green belt land as a general contingency for future housing development or for the removal of land from the Green Belt other than in the circumstances identified.</p> <p>Even if it was appropriate to identify Green Belt land as a potential contingency source, there are no additional significant areas of developable land available as indicated in the Capacity Studies (CDEs 28 and 53). Further information on the lack of potential for development in the Green Belt in Bristol is set out at Appendix 3.</p>
2.9	<p>I do not understand how the small sites contribution is a contingency i.e. something which the Council can do (or not) to make a difference to housing delivery. There will continue to be a flow of permissions from small sites over the plan period; the only contingency appears to be when and whether they should be counted as part of the supply.</p>	<p>The Council considers that a contingency does not necessarily have to be something which it can actively implement to make a difference to housing delivery. In this case the contingency is a reserve of likely developments which is only relied on in the circumstances of an increased housing allocation.</p> <p>30,000 homes can be delivered without reliance on small windfall sites. They are likely to be delivered in any case but they are too small to be allocated and their availability cannot be gauged with certainty over the long term. Delivery of 36,500 dwellings would need to rely on</p>

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	<i>Please explain how this element would operate as a contingency</i>	the likely contribution from small windfall sites as there are no other appropriate sources of supply to use in these circumstances. It is noted that the Secretary of State had envisaged that the higher housing figure would be met mainly from previously developed land – (CDE51 page 76).
2.10	Finally, reliance on a substantial contribution from small site windfalls is likely to have implications for the ability to deliver the housing mix and proportion and type of affordable housing identified as required in the SHMA. <i>On what basis is the Council satisfied that other planning objectives can be met by this element of supply?</i>	As explained above, the delivery of 30,000 homes in Bristol does not rely on a substantial delivery from small windfall sites but they are likely to occur. PPS3 does not seek to prevent the delivery of homes from small windfalls sites. The Core Strategy does not place restrictions on this form of development. The approach to housing type and to affordable housing is set out in Core Strategy policies BCS17 and 18. Both policies ensure that mix and deliverability of affordable housing is taken into account regardless of the scale of development.
2.11	The Council's second preference as a contingency is mixed use development of some industrial and warehousing land . Paragraph 4.5.14 indicates a potential of 1,700 homes from this source. <i>What is the evidence/justification for this figure? Various subsidiary questions come to mind. Please ensure that the Council's response picks up the potential implications of this contingency. For example (but not only) the following points: Is the potential source sites currently designated as Primarily Industrial and Warehousing Areas (PIWAs) and/or other non-designated employment sites? PIWAs where excluded from the SHLAA (paragraph 9.1). If some non-designated employment sites are included in the SHLAA, has double counting been avoided? The Employment Land Study (February 2009) recommends 60 of the</i>	The Council can confirm that the contingency applies to Principal Industrial and Warehousing Areas. Paragraph 4.5.14 of the Core Strategy refers to this but there is a typographic error in the relevant sentence. The sentence requires correction as follows: Industrial and warehousing land – the use of some Principal and Industrial and Warehousing Areas has clear implications for the economic objectives of the Core Strategy. The use of industrial and warehousing land as a source of additional land for housing was explored in the Preferred Options Review February 2009. The figure was part of a range used for testing and related to the overall level of homes which would be required should the Secretary of State's housing figures be confirmed. The contingency theoretically has an upper limit of the development of all of the city's designated PIWAs. Realistically, however, it is constrained by considerations of the developability of the industrial land for housing and the cumulative impact of the loss of land on the city's economy. The figure of 1,700 is considered appropriate for contingency purposes as it has been subject to testing through the Preferred Options Review process. It would provide for the delivery required of 36,500 homes.

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	<p>existing 68 PIWAs to continue to be designated in the Site Allocations DPD. <i>Does the figure of 1,700 make any assumption about the 8 PIWAs which the study suggests are no longer fit for purpose? The Core Strategy sets out criteria to identify suitable sites (4.5.14). Would these criteria be applied to all PIWAs or only the 8 considered not fit for purpose and non-designated employment sites? The suggested selection criteria are open ended. Whilst this would enable a flexible approach to be taken, they do not preclude residential use on sites which are suitable for continued employment use. What are the potential implications for the retention/delivery of sufficient employment land to meet the RSS job requirement?</i></p>	<p>There is no double counting. The contingency would be the use of some of those PIWAs which will be designated in the Site Allocations and Development Management Development Plan Document, based on the Employment Land Study. The criteria in the explanatory text would be applied to the sites thus designated. Those sites which the ELS recommended should not be retained as PIWAs have either been absorbed into the SHLAA already, or were developed, or had planning permission, for other uses.</p> <p>The retention or otherwise of other types of employment land or sites is addressed in Policy BCS8. That policy indicates that such places would be retained where they make a valuable contribution to the economy.</p> <p>The use of some PIWA land would have an impact on the supply of employment land. This potential harm or cost was explored in the Preferred Options Review (CDE44) and was subject to consideration in the Sustainability Appraisal process. The impacts would be mitigated to some extent by the mix of uses. Although the type of employment land would be fundamentally changed by development, the inclusion of uses with higher employment density as part of mixed development could mitigate some of the potential losses in job numbers.</p>
2.12	<p>I have wider concerns about the Core Strategy's provision for employment (see below), but in the context of housing supply I am concerned that this contingency could undermine the delivery of the economic objectives of the Core Strategy. Alternatively, if residential use is envisaged only on sites which are <u>unsuitable</u> for long term employment use, I see no reason why such sites should not be redeveloped in any case i.e. there is no reason for them to be treated as a contingency. Finally, I am unclear when</p>	<p>See comments above re: paragraph 2.11. The consideration of this source of supply indicates the challenging nature of the housing figure proposed in the draft RSS.</p>

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	<p>the Council envisage this contingency being triggered and how the additional housing would be delivered. Paragraph 4.5.14 refers to sites allocated through the development plan process. <i>Would this be via the Site Allocations DPD as currently programmed, require a delay in producing this DPD or require a subsequent allocations DPD?</i></p>	<p>The delivery of sites would occur through a planned process. The Monitoring and Review chapter of the Core Strategy explains that there would be a study to determine which locations would be used, leading to sites being allocated in a review of the Site Allocations and Development Management DPD (and Bristol Central Area Action Plan). The trigger for this review would be inability to show a five year supply or higher housing provision than expected set out in the RSS. Depending on timing, this could include a review process within the current DPD production process or a post adoption review leading to a revised DPD.</p>
2.13	<p>The third (lowest) priority contingency is the use of some Green Belt land for "urban extension development"</p>	<p>The Core Strategy refers to order of preference rather than priority.</p> <p>It is necessary to exercise caution with this contingency in the light of the RSS uncertainties discussed above. The development of homes within an area of search at southeast Bristol was added to the RSS in the Secretary of State's Proposed Changes of July 2008. It was not part of the draft RSS and was not a recommendation of the EIP Panel as explained above.</p>
2.14	<p><i>Please indicate what stage both BANES and North Somerset Councils have reached with their respect Core Strategies and their timetable to submission. Please provide a hard copy of both Council's most recent Core Strategy document. I cannot assume that any present opposition to these urban extensions necessarily means that when adopted their Core Strategies would not embrace these developments</i></p>	<p>The documents requested have been supplied.</p> <p>Bath and North East Somerset Council produced a Core Strategy Spatial Options Consultation document dated October 2009. A Core Strategy Launch (Issues) document was produced in September 2007. The next stage will be the preparation of a Core Strategy Publication Version later this year.</p> <p>North Somerset Council has produced a Consultation Draft Core Strategy dated November 2009. This follows a Core Strategy Issues and Options document, dated October 2007. The next stage will be the preparation of a Core Strategy Publication Version later this year.</p> <p>The Bristol Core Strategy neither assumes that there will be urban extension proposals in the</p>

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		neighbouring authorities nor assumes that they will not occur. It has been devised to address either set of circumstances to allow the Core Strategy to be progressed. This is considered an appropriate position to take given the uncertainties surrounding the RSS and is a flexible response.
2.15	I am unclear as to the circumstances in which the Council would regard this contingency in BCS5 as being triggered and progressed. Paragraph 4.5.15 indicates that this contingency "is not expected to be subject to consideration until at least 2021". <i>What does this mean in practice for the allocation of land for an urban extension?</i> Two particular points: if the Council has to deliver the 36,500 dwellings as required in the emerging RSS, then the annual requirement would increase throughout the plan period not just at the end. Secondly, as highlighted in the representations by Crest Strategic Projects and Key Properties (Ref 1465) there is likely to be a considerable lead time from the initial planning of a such a development to securing significant delivery. A decision on whether to proceed with this contingency could not be delayed until late in the plan period if it is required to support housing delivery to 2026. A need to review the Core Strategy to trigger a contingency is not a desirable approach	Table 5.1 in the Monitoring and Review chapter of the published Core Strategy explains that the trigger for this contingency would be higher housing provision than 30,000 set out in final RSS, including identification of land in southeast Bristol. Therefore, although the Council does not anticipate any development before 2021 would be required, the trigger for consideration would be on publication of the RSS in the form indicated.
2.16	I am unclear whether the contingency for some form of SE urban extension is envisaged	The wording of the RSS in relation to urban extensions and areas of search is clarified above. It is not clear from its wording that the draft RSS necessarily envisages a large urban

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	<p>as being pursued by Bristol City Council irrespective of what the BANES Core Strategy eventually proposes. The RSS clearly envisages a large urban extension straddling the boundary. <i>Is there potential for a more modest urban extension within Bristol City's boundary with the possibility of further expansion?</i> Close cross boundary working is intended to avoid such uncertainties, but my preliminary view is that there may be the need for some contingency relating to the final outcome of the Core Strategy for BANES. Please consider how this might be worded</p>	<p>extension straddling the boundary.</p> <p>Policy BCS5 refers to land in southeast Bristol as a long term contingency for urban extension development. The broad location is shown on the Key Diagram and this is within the boundary of Bristol City Council. Therefore, the contingency for an urban extension at this location could be used irrespective of the approach of the neighbouring authority.</p> <p>Bath and North East Somerset Council has submitted representations in respect of the Core Strategy which raise strong concerns about the identification of the area in question as a contingency for future housing development (CDE35 – Representation from Bath and North East Somerset Council).</p> <p>The third paragraph of Core Strategy Policy BCS6 discusses joint working arrangements in the event of urban extension proposals.</p>
2.17	<p>I am unclear what evidence/assessment the Council has made (whether undertaken on its own, jointly with the neighbouring authority or prepared by others) to assess the capacity and potential deliverability of both urban extensions identified in the RSS. <i>Please explain.</i> I have seen reference to a document "Capacity Appraisal Studies of the Proposed Urban Extensions South East and South West of Bristol" (BCC January 2007). <i>Please provide a hard copy</i></p>	<p>The document requested has been supplied. This indicates the areas which at the time of preparation were considered to have potential for urban extension development. Those areas were considerably less than the extent of the designated green belt which in itself represents relatively small area within the city boundary. Most Green Belt land within the city boundary is undevelopable through reason of topography, landscape importance, nature conservation value and use for recreation.</p>
2.18	<p>Paragraph 4.5.15 of the Core Strategy indicates that the capacity of the SE urban extension is unlikely to exceed 1,500 homes.</p>	<p>This figure reflects the RSS Proposed Changes (CDE50) indicated level for provision within the area of search in BCC's area at this location and is based on work carried out in preparation of the Preferred Options Review (CDE44).</p>

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	<p><i>On what assumptions is this assessment based? Is the Indicative Masterplan now provided by Crest Strategic Projects and Key Properties significantly different to the scheme on which the Council's SA assessment was based? I invite that Council to make a fresh SA assessment based on the information provided by the prospective developer of land at Hicks Gate. (I appreciate that this may not be possible by my initial deadline.)</i></p>	<p>The Council's sustainability appraisal of the southeast urban extension is set out in the document entitled "Sustainability Appraisal Update Preferred Options Review" dated February 2009. This document contained the results of the appraisal of the six approaches put forward for accommodating the additional dwellings proposed by the Secretary of State. One of these approaches was for an allocation of up to 1,500 new homes in an urban extension to the southeast of Bristol to the west of the A4 Park and Ride site. The sustainability appraisal was based on an assessment of land capacity at this location. However, unlike Crest's scheme which looked at the wider area, Bristol's capacity assessment was limited to land falling within Bristol's boundary, that is within the boundary of the Core Strategy. The main difference between the Council's assessment and the masterplan submitted by Crest is the assumption regarding the amount of residential development which could be accommodated within Bristol's boundary. Crest's masterplan indicates that the majority of residential development would fall within Bath & North East Somerset, with very little within Bristol's boundary. It is not, therefore, considered necessary or appropriate for a fresh sustainability appraisal assessment to be carried out.</p> <p>A comparison of the sustainability appraisals of the Core Strategy and the draft RSS is included at Appendix 4 for information.</p>
2.19	<p>Irrespective of what is proposed within Bristol City's boundary, I am unclear as to the extent to which the Council (and the Core Strategy) has taken into account the implications of possible large scale urban extensions just beyond the boundary. <i>What difference could or should such developments make to what is</i></p>	<p>Although proposing that there should be an unspecified number of extensions to the urban area of Bristol, the Regional Spatial Strategy says little on the implications they would have on the city beyond suggesting that they can support and complement the regeneration of South Bristol. The Sustainability Appraisal of the RSS similarly lacks detailed consideration of the impacts.</p> <p>As the Issues and Options and Preferred Options papers show, the potential for large urban</p>

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	<p><i>planned within Bristol City? Please explain how this has been taken in to account. One example would be the implications for the capacity (both of rapid transit and other traffic) and deliverability (including funding) of the South Bristol Link</i></p>	<p>extensions has been acknowledged throughout the production of the Core Strategy. The Preferred Options document indicated the Areas of Search and explored the issue of urban extensions.</p> <p>The deliverability of the South Bristol Link and the North Fringe to Hengrove and Ashton Vale to the City Centre rapid transit proposals are not affected by the urban extension proposals set out in the Regional Spatial Strategy. None of the schemes are dependant upon the delivery of the urban extensions for funding or for necessary patronage.</p> <p>Major Scheme Bids for the South Bristol Link and North Fringe to Hengrove Package (which includes rapid transit proposals) were submitted to the Department for Transport on in March 2010. In March 2009 a major scheme business case submission for funding for the Ashton Vale to Temple Meads rapid transit route was submitted. First stage approval - Programme Entry - was awarded by the Department for Transport in March 2010.</p>
2.20	<p>Paragraph 4.5.16 indicates that the potential capacity of land to the south west is too limited to be identified as a meaningful contingency for future supply. The submitted evidence includes a "Capacity Appraisal of Sites in the South West of Bristol" (February 2010) which is more recent than the publication version of the Core Strategy. This identifies a capacity of around 500 (varying with assumed density). <i>Was this figure in mind when paragraph 4.5.16 was written?</i> Clearly the reasonableness of this assessment may need to be explored as the Examination proceeds, but I do not regard a potential supply of 500 dwellings from within the Green Belt as so small as to be ignored in the CS. <i>What are the Council's intentions with regard to potential housing delivery in this</i></p>	<p>The "Capacity Appraisal of Sites in the South West of Bristol" was originally completed in January 2009 and included a capacity figure of between 380 and 494 dwellings (depending on density). The document was not published at that time but this figure was in mind when Core Strategy paragraph 4.5.16 was written.</p> <p>In February 2010 the report was updated and amended to include an additional 1.6 hectares of land along the western edge of Site 5: Highridge Common, as land with potential to accommodate development. This provided an additional 65-84 dwellings to the total. This is not a significant increase and would not have influenced the wording of paragraph 4.5.16.</p> <p>The purpose of the report was to assess the potential capacity of Green Belt sites in this part of Bristol that may contribute towards the housing provided in a proposed South West Bristol Urban Extension. The report does not purport to determine the level of housing that would come forward in a planned urban extension as the suitability of these sites would need to be considered within the context of a masterplan for the development. A masterplanning exercise was undertaken by Broadway Malyan Consultants, commissioned by North Somerset Council, and their illustrative masterplan identified the Bristol sites for a mix of</p>

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	<p><i>area? In particular, if the larger part of urban extension (in North Somerset) were to proceed, would the Council be positively planning to integrate this effectively with the urban edge of Bristol with the potential for 500 dwellings within its boundary? If so, the Core Strategy should make this clear. Alternatively, does the Council see any potential for housing delivery from this Green Belt fringe even if the main urban extension did not proceed (because it did not need to be pursued in North Somerset's Core Strategy)? Again, the Core Strategy should make the position clear</i></p>	<p>playing field/open space uses, a business park and only limited housing provision, well below the figure of 500. Similarly, the extant "Ashton Park" planning application proposes to use the Bristol sites predominantly as playing fields and open space. Only very limited housing is proposed in Bristol on just one site adjacent to Highridge Common.</p> <p>If the urban extension were to proceed the Council would look to integrate this effectively with the urban edge of Bristol in the most appropriate manner. The Core Strategy specifies the Council's preference that the land in question is retained as part of the green infrastructure provision of any development.</p> <p>The potential capacity of the land in question is not ignored in the Core Strategy. The technical capacity is acknowledged in paragraph 4.6.6 but the Council does not identify the land as a potential contingency for housing delivery. If the larger urban extension does not proceed as the three sites identified would be isolated and could not readily be developed sustainably, having regard to placemaking principles. They would become isolated housing sites in peripheral locations.</p>
2.21	<p>On the evidence currently before me, I am unlikely to be able to find the Core Strategy sound on the basis of the wording of policy BCS5. I am not in a position yet to suggest what changes might remedy this potential unsoundness as there are too many other issues and areas of evidence with potential impacts on how this should be addressed that I still need to explore. Nevertheless, I would urge the Council to consider, firstly, what changes would make the Council's current intentions clearer. And, secondly, on a without prejudice basis if necessary, wording which responds more positively to the requirements of the emerging RSS (but taking into account</p>	<p>As explained the Core Strategy has had regard to the draft RSS and is fully consistent with PPS3 in terms of housing delivery. The Council would be pleased to consider any further observations the Inspector may have on this following consideration of this response. The Council would be pleased to provide any further information or clarification which may be requested.</p>

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	uncertainties arising from cross-border implications) and of PSS3. It would facilitate the progress of the Examination overall if it were possible to discuss at the hearings the wording of possible changes	
3.	Components of the 30,000 dwellings identified in Policy BCS5	
3.1	In this section I set out some questions and comments in relation to the evidence justifying the delivery of the 30,000 dwellings the Core Strategy specifies as its minimum housing provision. Underlying issues will need to be explored further with participants at the hearings. At present, I seek clarification of some specific points only	
	<i>SHLAA 2009</i>	
3.2	Paragraph 1.1 refers to the SHLAA being considered by the West of England Housing Market Partnership meeting on 12 March 2009. <i>What comments did they make?</i>	The draft minutes of the meeting are provided at Appendix 5. There was unanimous support for Bristol's SHLAA and no abstentions.
3.3	Paragraph 4.6 refers to "Area Green Space Plans" for 14 Neighbourhoods to be consulted on during 2010 which, among other things, will propose low value green spaces which the Council might dispose of. The SHLAA assumes a global contribution from this source of 1,100. <i>How has this figure been derived? When are the Area Green Space Plans likely to be available in draft and approved?</i>	<p>The developability, deliverability and capacity of potential disposal sites, at the time of carrying out the SHLAA, were assessed in the same way as other sites included in the SHLAA. Individual sites were not identified in the SHLAA in advance of the consultation on the Area Green Space Plans. This is because development of existing recreational open space is a matter which causes understandable public concern. To identify sites for potential development in a technical document ahead of full community consultation would be inappropriate. However, as the Core Strategy indicates that some land of this type will be used to meet development needs it is appropriate to make a global assumption about the level. These global assumptions are based on analysis of actual sites.</p> <p>Sites identified for disposal or partial disposal through the Area Green Space Plan process</p>

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		<p>are being assessed in accordance with Bristol City Council's Parks and Green Space Strategy (PGSS) minimum quantity and distance standards and against value criteria set out in the PGSS. Disposal has also been identified where it is considered development would benefit the residual open space.</p> <p>A consultation on the Area Green Space Plans, including potential disposal sites, will take place between June and October 2010, at the same time as the Site Allocations and Development Management DPD Options consultation.</p>
3.4	<p>In the Site Schedule in the SHLAA under "Action to overcome constraints" the description "Review underway (February 2010)" applies to many sites. <i>What is this process and when will it be completed? Please provide the outcome when available.</i></p>	<p>This refers to 4 sites in total with an estimated SHLAA net capacity of 273 units. The sites in question are areas of Precast Reinforced Concrete (PRC) dwellings which have been identified for redevelopment. Financial constraints have raised the possibility that the redevelopment to provide new homes of better quality may not provide as many additional dwellings as first envisaged. However, as low density sites they retain the potential for redevelopment at higher densities. Future review of the SHLAA is likely to reduce the estimated dwelling numbers expected from these particular sites (subject to any future changes in policy or funding streams which could potentially change the position again).</p>
3.5	<p>Paragraph 9.5 of the SHLAA refers to a number of sites falling within Flood Zone 2. In the site schedule in the SHLAA flood risk is identified as a constraint for 2 sites SH0013 and SH0033. <i>Are there others?</i> By reference to diagram Area C Flood Zone – FZ3a + climate change in the "Strategic Flood Risk Assessment Level 2 SFRA Main Report" (Nov 2009) a large part of site SH0033 appears to be in flood zone 3 (not 2). Is this correct? Has this greater risk/constraint been taken into account in estimating the potential capacity of</p>	<p>Information of the flood risk issues on certain SHLAA sites is set out at Appendix 6. No development has been assumed on parts of sites identified as being within flood zone 3 but potential on land in flood zone 2 is identified.</p> <p>Site SH0033 contains areas in flood zone 3. It is noted that this area is identified for a mix of uses as part of expansion of the city centre and may not therefore ultimately be used for the level of homes indicated. It is noted that the SHLAA provides an estimate of likely capacity based on information available at the point of its production. It is a technical document rather than a policy statement. It does not take account of interventions, such as the emerging Bristol Central Area Action Plan which will enable a holistic examination of the City Centre addressing a range of matters such as the provision of new homes. It is further noted, in the case of this particular site that, having regard to the aims of the Core Strategy and the</p>

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	this site?	Secretary of State's intentions regarding central area regeneration, provision of some homes in this location may ultimately be considered appropriate in terms of the sequential and exceptions test, subject to mitigation of risk. Further work is needed to consider this issue and the emerging Bristol Central Area Action Plan provides an appropriate context for this work.
3.6	Paragraph 4.16.4 of the Core Strategy indicates that the Site Allocations and Development Management DPD will follow a sequential approach to the allocation of sites for development in accordance with PPS25. On this basis, sites in the SHLAA affected by higher flood risks (zones 2 and 3) must be regarded as uncertain in terms of land supply at this stage. Given that there is no headroom or flexibility from the identified sources of supply to meet even the Core Strategy's 30,000 minimum, this immediately raises a question mark over effective delivery	Headroom for the provision of 30,000 dwellings is contained with the small windfalls sites contingency which is used for the possible delivery of 36,500 dwellings. In the case of significant delivery failure the other identified contingencies in the 36,500 dwellings scenarios could be considered. There is, therefore, reasonable prospect of the delivery of 30,000 dwellings within the plan period. It is acknowledged that there is little headroom with a level of 36,500 dwellings within the plan period. That is because there are no additional, realistically available sources to provide for such headroom.
3.7	In my view, it is reasonable to delegate to a site allocations DPD the application of the sequential test only where there is a sufficient basket of potential sites to enable real choice in site selection. On the evidence before me, I consider that the sequential test needs to be applied to inform the overall strategy for housing delivery in Bristol. This is a matter for the Core Strategy. It is only at the Core Strategy stage that there is the opportunity to make any real choice between some development on, say, low risk peripheral	The paper requested is in preparation and will be provided. The basis for sequential testing would need to have regard to the draft RSS and the level of housing proposed. The Secretary of State's reasoning for a higher housing figure for Bristol was predicated in large part on development and regeneration in the central area and south Bristol and development of previously developed land. Having regard to the spatial steer set out in the RSS, the choice would appear to be between different parts of the urban area, especially South Bristol and the central area, rather than between central sites and low risk peripheral greenfield sites (of which there are few).

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	greenfield sites and, say, any higher risk central sites. <i>I invite the Council to prepare a short position paper on the application of the sequential test and its implications for the strategy.</i> I suggest this is done by the Pre-Hearing Meeting so that it can then be the subject of comment by others leading up to the hearings. The Position Paper should be discussed with the Environment Agency	
	<i>Five year Housing Land Supply 2009-2014</i>	
3.8	The evidence in this document is clearly important for underpinning some aspects of the SHLAA and the assumptions made in it will need to be explored at the hearings. Consistent with the advanced state of the emerging RSS, I consider that a 5 year supply should be calculated on the basis of the RSS target of 36,500. <i>Please provide this analysis</i>	The Council considers that it would be premature and inappropriate to establish the five year supply on the basis of the draft RSS figure of 36,500 for the reasons explained above. However, the Council has carried out a calculation based on this figure for information. It shows that, based on Bristol's trajectory, there would be a five year supply in both scenarios 30,000 and 36,500. This information is set out at Appendix 7.
3.9	Despite the explanation provided in paragraphs 2.9-2.14 I am unclear how in practice sites with planning permission but not yet started were assessed. It seems that all such sites were identified as available, suitable and achievable. <i>Is this correct?</i> The penultimate sentence of paragraph 2.14 reads oddly. <i>Is <u>no</u> missing before <u>obvious</u>?</i> If there were to be evidence which indicated that some of the permitted sites would not come forward as expected would raise a question mark about overall delivery	<p>All sites with planning permission were considered to be available, suitable and achievable unless, as a result of the survey response, the Council was informed that the site would not be developed between 2009 and 2014. 9,126 dwellings out of 12,387 dwellings with planning permission are expected to be developed between 2009 and 2014. The remaining 3,096 dwellings are expected to be developed between 2014 and 2026.</p> <p>Yes, with regard to the penultimate sentence it should read "...if there are no obvious constraints...".</p> <p>The sites which the Council was told by respondents were unlikely to be developed within the 5 year period (155 dwellings) are excluded from the 2009-2014 supply period.</p>
3.10	Paragraph 2.10 refers to sites amounting to	The 155 dwellings are not included within the 5 year supply figure as we were informed by

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	<p>155 which owners/developers indicated would not be pursued. <i>Has this number been taken off the total contribution from permitted sites along with the re-adjustment for new dwelling numbers on some sites referred in paragraph 2.3</i></p>	<p>the respondent(s) that they would not be delivered between 2009 and 2014. However, until those sites are developed for non residential use they still have potential to be developed for housing and have been added to year 2014/15 in the trajectory.</p> <p>Where a respondent has informed us they are hoping to build more or less dwellings than granted planning permission, these amended figures have been included in the trajectory and not the number granted planning permission.</p>
	<p><i>Delivery by City Area</i></p>	
<p>3.11</p>	<p>So that I (and others) can more readily relate the SHLAA sites to those policies in the Core Strategy which indicate housing numbers in different parts of the City, <i>please produce a SHLAA site schedule divided between policy areas BCS1, BCS2, BSC3 and the rest of Bristol (summing each area). Please also indicate where the broad boundaries between these different policy areas lie on the maps of SHLAA sites (or which complete Neighbourhoods Partnership Areas correspond to the 5 spatial areas in the Core Strategy)</i></p>	<p>A table setting out this information by city area is included as Appendix 8</p>
<p>3.12</p>	<p>Table 7.1 of the "Infrastructure Delivery Programme" March 2010 provides a summary of completions, commitments and total planned provision in the 5 spatial areas of the City. But is difficult to relate this table to the table in policy BCS1 and the SHLAA sites. There is a need to present anticipated delivery in the 5 spatial areas in a comprehensive way, but which also makes clear what information is being drawn from what sources. I want to fully understand what headroom or flexibility in</p>	<p>The table at Appendix 8 below should assist in providing this information. Issues relating to flexibility and headroom are discussed above.</p>

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	<p>housing delivery might exist in each area and overall. The table on p7 of the SHLAA suggests very little even for the delivery of the Council's 30,000 minimum, let alone to help meet the emerging RSS figure. This is a concern</p>	
3.13	<p>I want to be better informed about the prospects for delivery of the 10,000 dwellings proposed for South Bristol given that this represents the largest single contribution to housing supply and that a number of representations question the practicality of achieving this target. <i>What are the critical constraints which need to be overcome? Who are the key landowners and developers? What is the expected role of the HCA, RDA and so on? In short, how is the Council going to make this happen?</i> Anticipated implementation/delivery should also be related to the timing of the key transport improvements in this area, particularly the South Bristol Link and the Hengrove to north fringe rapid transit route. <i>What would happen if these schemes were significantly delayed (eg because of a lack of funding)?</i> There is some relevant information in parts of the "Infrastructure Delivery Programme" March 2010 (eg 6.5-6.11) but I found this information difficult to relate to the overall South Bristol proposals. <i>I invite the Council to prepare a position paper regarding delivery in South</i></p>	<p>The requested paper is in preparation and will be provided before 11 May. The paper will be based on information summarised in the delivery section of Policy BCS1 and information contained in the Infrastructure Delivery Programme. It will also draw on the joint West of England Delivery and Infrastructure Investment Framework submitted to the Homes and Communities Agency following the 'Single Conversation' process.</p>

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	<p>Bristol. I suggest this is done by the Pre-Hearing Meeting so that it can then be the subject of comment by others leading up to the hearings. I would encourage the Council to seek the agreement of key partners to any such paper</p>	
4.	Employment Land	
4.1	<p>The Employment Land Study (ELS) (February 2009) identifies, among other things, a requirement for 24.5ha of new industrial and warehousing land in the city other than at Avonmouth. It recommends that consideration be given to allocating 20ha east of the Brislington Park and Ride site and 5ha adjoining the Nover's Hill and Vale Lane PIWA (whilst noting some constraints in this area)</p>	
4.2	<p>The only steer for <u>new</u> industrial and employment land given in the Core Strategy (BCS1/BCS8) is 5-10ha at Nover's Hill/Vale Lane. On what evidence is it considered that there is capacity for possibly 10ha in this location, given the cautious approach in the ELS to only 5ha. Have the allocations of new employment land in the adopted local plan adjoining these PIWAs been implemented? What is the size of these allocations? If not implemented in the past 12 years, does this suggest some constraint or lack of market interest? Please provide a plan (based on the Proposals Map) showing indicatively the area of land (or broader area of search) that might</p>	<p>The Core Strategy does not propose the development of 24.5 hectares of employment land. Policy BCS8 plans for 5 to 10 hectares, focused on the Novers Hill/Vale Lane area in South Bristol. Paragraphs 4.8.13 to 4.8.15 of the submitted Core Strategy acknowledge the ELS recommendation but then outline the approach taken to that recommendation in the Core Strategy.</p> <p>The capacity referred to is based on site assessments made by planning officers.</p> <p>The two local plan allocations are shown at Appendix 11. They total 3.3ha. 'Plan 2' shows that four planning permission have implemented 2.1ha of this total, leaving 1.2ha to be implemented. This indicates market interest in this location. The area's continuing importance for industrial-related activities is also reflected in the West of England's Joint Waste Core Strategy 'Pre-Submission' Version (January 2010) http://www.westofengland.org/media/170410/jwcs%20pre-submission%20document.pdf (p.62). This identifies the area as</p>

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	<p>be involved</p>	<p>containing a site appropriate for a strategic waste facility, specifically 'Residual Waste Treatment Development'. Such uses are appropriate in PIWAs as set out in Policy BCS8 of the Bristol Core Strategy.</p> <p>'Plan 3' shows the indicative areas of search for the proposed new 5-10ha PIWA allocations. These areas of search total 8.9ha. It also shows the draft new PIWA designations. Both these draft allocations and designations will be subject to further assessment and public consultation in the production of the Site Allocations and Development Management DPD (consultation commencing in June 2010) and consultation on the Knowle West Regeneration framework (June 2010) which covers part of this area.</p> <p>In relation to the delivery of new industrial and warehousing land, the council acknowledges that the Core Strategy does not fully meet the ELS recommendation. However, it is considered that the Core Strategy identifies a suitable and deliverable amount of new industrial and warehousing land. The Council it does not consider that this will seriously hamper the council's economic objectives. A key element of the council's strategy is to safeguard almost all of the city's existing and considerable stock of PIWAs. The area covered by PIWAs is over 1,150ha - 10% of the land area administered by the City Council. 24.5ha of new industrial land would represent a 2% addition to this existing stock. Therefore, it is considered that whilst 24.5 hectares of new land would make a useful contribution in the circumstances of high GVA growth, to deliver the full amount will not threaten Bristol's economic potential as there is already a very considerable supply of existing industrial land which will continue to be safeguarded.</p> <p>It is also possible that additional industrial and warehousing land could arise through the Site Allocations and Development Management Development Plan Document process – various sites within the built up area are under active consideration for such uses and these are likely to be shown in the consultation stage of that document. Deliverability of these may not be certain as other land uses may prove more suitable. However, it is possible that further new land will be identified.</p>

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4.3	<p>The Council's Preferred Options (January 2008) suggested in policy BCS01 the provision of 24.5ha of new industrial and employment land in South Bristol (which included Brislington). The Preferred Options Review (February 2009) also suggested the provision of 24.5ha for new industrial and employment land (15ha at Brislington P & R and 5-10ha at Nover's Hill/Vale Lane PIWAs). Paragraphs 4.8.13 -4.8.15 of the Core Strategy comment on new employment land, but do not explain why the recommendations of the ELS have not been followed through. The Council has not previously indicated that the recommendations in the ELS are disputed and has used them to inform emerging policy. I recognise that existing industrial premises may well be redeveloped for new employment purposes (and suitably located sites may well be redeveloped to provide a more intensive employment use such as offices). But I do not see how the redevelopment of existing premises within PIWAs can be regarded as meeting the need for <u>new</u> industrial and warehousing land as recommended in the study</p>	<p>The approach to industrial and warehousing land is discussed above.</p> <p>It is accepted that paragraph 4.8.15 of the explanation to policy BCS8 is incorrect and would benefit from amendment.</p> <p>The intention of this paragraph was to make the point that redevelopment proposals on existing industrial areas may result in new industrial and warehousing <u>floorspace</u> being provided.</p> <p>This stemmed from the observation that on a number of PIWAs there are to be opportunities to use land more efficiently. There are also sites within PIWAs where there are large areas of undeveloped land and seemingly unused hardstanding. It is conceivable that over the plan period re-development proposals may come forward which make better use of these kind of sites and so provide new industrial and warehousing premises and floorspace. However, para 4.8.15 erroneously states that this would create new <u>land</u> and floorspace.</p> <p>To address this point, it is suggested that para. 4.8.15 could be amended to remove the word land so that it to reads: 'The Core Strategy promotes the retention and renewal of the existing Principal Industrial and Warehousing Areas. Whilst this will not deliver new industrial land, redevelopment proposals which intensify and recycle land and premises on these areas are expected to make a contribution to providing new industrial and warehousing floorspace'.</p>
4.4	<p>I have other concerns about the employment strategy. Despite the date of its publication, the ELS is based on work undertaken in 2006/7. A number of representations express</p>	<p>The council considers that this recent development activity does not fundamentally affect the robustness of the ELS and its assumptions about the need for further industrial and warehousing land over the Core Strategy plan period. It also feels that its approach to Avonmouth in Policy BCS4 is the most appropriate strategy for delivering sustainable</p>

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<p>concern that some of its assumptions are out of date, especially in relation to the availability of land at Avonmouth. I will need to explore this at the hearings, but I encourage the Council to discuss this matter with key stakeholders. The Bristol Business Development Survey Report (2009) refers (p11) to a boom in recent years in the industrial/warehousing sector related to the construction of large scale storage and distribution facilities in Avonmouth, leading to a significant decrease in the pipeline stock of such sites. Fig 3 shows that in 2007/8 and 2008/9, 29ha and 23ha respectively of land for industry and warehousing were completed, much more than in any of the previous 5 years (which I assume are the years underpinning the ELS). <i>I invite the Council to explain</i> how this recent spurt in development and reduction in the pipeline supply (and any more recent evidence relating to 2009/10) corresponds with the assumptions made in the ELS about the adequacy of provision at Avonmouth and more generally the need for further land for industry and warehousing</p>	<p>development in this location, integrating economic, environmental and social aims in accordance with PPS1 para. 4.</p> <p>Looking at the approach to Avonmouth firstly, there are a number of reasons why the council considers it appropriate to advocate an approach in Policy BCS4 which promotes renewal and redevelopment of existing employment areas, rather than promote new greenfield land allocations:</p> <ol style="list-style-type: none"> 1) Notwithstanding the high levels of completions in 2007/08 and 2008/09, there is still a very significant amount of industrial and warehousing floorspace with planning permission which has yet to be implemented. This pipeline figure amounts to 155,592 sqm as of March 2009 (see 3.2.2 of the Business Development Survey). The Business Development Survey also noted that only 8,210 sqm of this total was under construction in 2009 compared with 96,008 sqm in 2008. This perhaps reflects the current economic conditions and market concerns over whether occupiers will be found for schemes if constructed. This would indicate that there are significant uncertainties over whether this pipeline supply will be implemented. 2) The council considers that there are still significant development opportunities in the area. These include those sites suitable for redevelopment owing to the redundancy of their last use. An example would be the 22ha former Sevalco Chemical Works site at Severn Road. Similarly, there are undeveloped areas within the existing PIWAs in Avonmouth which have potential for new industrial and warehousing development. Examples include the 6ha Gun Battery site at Smoke Lane and 6.5ha of land previously used as a spoil heap adjacent to Weston Lane. Furthermore, since the onset of the recession, vacancy levels of premises in Avonmouth have increased. This currently includes the 14.5ha Crossflow550 distribution warehouse site on Lawrence Weston Road. Plans showing these sites and more detail about the increase in vacancy levels in Avonmouth can be provided if it would be helpful. 3) Even if the pipeline supply, the brownfield, undeveloped and vacant industrial sites were implemented / occupied, the council would still need to address the many other significant constraints that exist in Avonmouth before it would be able to sustainably promote new

	Inspector's comments and questions	Bristol City Council Response
		<p>greenfield land employment allocations. These constraints are referred to in the 'Context' section of Policy BCS4.</p> <p>Firstly, the Highways Agency have indicated they would oppose new allocations without the accompanying delivery of significant levels of new road development and associated infrastructure to address the adverse impacts that would be caused on the already stressed M5, Junctions 18 and 19. The Agency made representations to the Examination in Public of the RSS to this effect. Government has made clear that these road improvements will not be funded publicly.</p> <p>Secondly, the nature conservation importance of the remaining undeveloped green field sites within Avonmouth has been identified through the Core Strategy's Habitat Regulations Assessment (HRA). The HRA (para. 4.9.14) highlighted that brownfield sites might possess value for important bird species associated with the Severn Estuary Special Protection Area. As these brownfield sites are promoted for industrial redevelopment and renewal by Policy BCS4, the remaining green field sites in Avonmouth – if appropriately managed - may have significant value in providing replacement habitat for these displaced bird species. As the 'Policy Delivery' section of BCS4 identifies, the council is currently exploring the potential for habitat creation in the Avonmouth area.</p> <p>4) The council also considers that it is relevant to have regard to Avonmouth's sub-regional context, specifically the strong physical and market connections between Avonmouth and the adjoining Severnside industrial area, within South Gloucestershire Council's administrative boundary. The property market and development industry regard Avonmouth and Severnside as one industrial area. This can be seen in Alder King's market commentary for the ELS (see paras 3.1-3.19 of ELS Annex A4). The 1957/58 ICI planning permissions allow industrial / warehousing development on around 650ha of land at Severnside. Tesco have recently opened a 25 hectare regional distribution centre on the northern part of this 'ICI land'. In addition, SDLL announced in January 2010 that they are expecting to bring forward around 300ha of their part of the ICI permission (Portal West Distribution Park) to the market. Therefore in a sub-regional context there is a very considerable supply of land readily</p>

	Inspector's comments and questions	Bristol City Council Response
		<p>available in the Avonmouth/Sevenside industrial area.</p> <p>Related to this, the Strategic Flood Risk Assessment Level 2 SFRA – Main Report (November 2009) indicates the significant levels of tidal flood risk in Avonmouth (e.g. see para. 7.6.1, p.41) which are likely to increase with climate change. Given this and the existence of the valid 650ha ICI permission it would seem a sensible approach to avoid promoting further green field industrial land allocations in this area as this could worsen flood risk elsewhere in Avonmouth/Sevenside and, in the event of a serious flood event, endanger more life and property.</p> <p>With regard to the ELS, the council is satisfied that the study provides a robust assessment of the likely future demand for industrial and warehousing land over the 2006-26 Core Strategy plan period.</p> <p>Its methodology followed that advocated by the Government's 'Employment Land Review – Guidance Note' (Dec. 2004). For example, its assessment of demand for industrial and warehousing land used a range of methods, including economic and employment growth forecasts. In making this assessment, the ELS (see paras 4.47-4.56, pp.41-43) aligned itself with the economic growth assumed by the RSS; i.e. 3.2% annual growth in total output (Gross Value Added, or GVA).</p> <p>It then utilised the Cambridge Econometrics (CE) model employed by the Regional Assembly for the RSS to calculate the growth in industrial and warehousing job numbers that would be generated by this growth over the plan period (see ELS Report, Table 4.4, p. 44). This was undertaken by identifying the Bristol City Council area share of growth forecast by Cambridge Econometrics for the Bristol Travel To Work Area (the lowest geographical level for which CE's forecast for the RSS was interpreted at the time of analysis. To determine floorspace and land requirements it then applied job to floorspace ratios recommended by the Government's Guidance Note (also see Table 4.4). These calculations indicated that over the plan period industrial jobs were expected to fall slightly (by 1,300) whilst warehousing jobs would grow slightly (by 3,000.) Combined, this meant that industrial and</p>

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		<p>warehousing employment was likely to increase by 1,700 in the period 2006-26. This led to a relatively small projection for new industrial and warehousing land being identified (see Table 4.7, p.47). In order to produce locally relevant findings, as well as using economic forecasts, the level identified also reflected local property market views of the need for new industrial and warehousing in the Bristol area (outside Avonmouth/Severnside), as provided by Alder King in their market commentary of July 2007 (see ELS Annex A4). The level also reflected the likely property requirements of those key local economic sectors identified as having potential for growth (see ELS Report, paras. 4.26-4.32 and ELS Annex A3).</p> <p>To conclude, the council accepts that there are many uncertainties in predicting future economic and jobs growth (and consequent employment land requirements). As with Employment Land Studies produced by other local planning authorities, the ability to predict and incorporate short-term economic development spurts or contractions is limited as the approach recommended by Government is to consider employment land needs over the whole plan period.</p> <p>Nevertheless, it considers that the ELS's assumptions for the need for new industrial and warehousing land are robust for the following reasons:</p> <ol style="list-style-type: none"> 1) The ELS employed the methodology recommended by the Government's Guidance Note; 2) It aligned itself with levels of economic and jobs growth promoted and assumed by the RSS; 3) It utilised the Cambridge Econometrics model employed by the Regional Assembly for the RSS to calculate the growth in industrial and warehousing job numbers; 4) Its assessment of the requirement for new industrial and warehousing land also reflected the advice of local property agents as well as the needs of key local economic sectors identified as having potential to grow, thus ensuring it is grounded in 'market reality'. <p>Finally, it is considered that the robustness of the ELS's methodology and findings on the demand for industrial and warehousing land are also reflected in the fact that they broadly match those produced by Roger Tym and Partners in their report for the Regional Assembly, 'RSS Employment Land Provision: Spatial Implications' (August 2008). This report was</p>

	Inspector's comments and questions	Bristol City Council Response
		<p>commissioned by the Regional Assembly in response to the Inspectors Panel Report for the RSS which had recommended that additional guidance should be provided to local planning authorities on the employment land requirements resulting from the draft RSS's policies. The Roger Tym report suggests that industrial and warehousing jobs would fall slightly in Bristol (by 542) in the same 2006-26 plan period, whilst the industrial and warehousing floorspace requirement would fall slightly (by 18,975 sqm) - see Table 2.6, p.26 & p.49, respectively, of the Report's Appendices</p> <p>http://www.swcouncils.gov.uk/nqcontent.cfm?a_id=4381&tt=swra.</p>
4.5	<p>Policy BCS8 indicates intended provision of new office space as follows: 150,000m² in the city centre, 50,000m² in South Bristol (also stated in BCS1) and 36,000m² distributed amongst town, district and local centres across the city. <i>Does the latter mean those centres outside South Bristol?</i> If this is the intention the policy wording would need to be changed to be clear. Table 3 in the Business Survey Report indicates planning commitments which nearly equate to this total (although the breakdown is by local plan areas rather than the Core Strategy policy areas and thus area sub-totals cannot be compared). Does this mean that the intended office provision is largely met by existing commitments?</p>	<p>The policy refers to centres 'across the city' which includes South Bristol centres as well as those centres in the rest of the city. To add to clarity the wording of the policy could be amended to:</p> <ul style="list-style-type: none"> • 36,000 m2 focused on town, district and local centres across the city <p>with the last sentence of explanatory text paragraph 4.8.12 amended to read:</p> <p>To support its regeneration, 50,000m² of the total requirement is focused on South Bristol. The remaining 36,000m² is proposed for Town, District and Local Centres (which may include centres in South Bristol, as a limited addition to the 50,000 m² specifically identified for that area)</p> <p>The intended office provision is likely to be met from existing commitments (with the city centre pipeline making a particularly substantial contribution). A table showing existing net commitments is attached as Appendix 9</p> <p>Delivery of the target amounts is conditional on these planning permissions being implemented. It is also dependent on whether secondary office stock will continue to be redeveloped resulting in losses of existing office floorspace. On-going assessment of the delivery of this part of the Policy BC8 will be carried out by the Annual Monitoring Report</p>

	Inspector's comments and questions	Bristol City Council Response
		<p>using the targets and indicators shown on p.65 of the Core Strategy.</p> <p>Although the global amount of offices is likely to be delivered from existing commitments, new permission for floorspace will be needed to meet the spatial intentions for South Bristol. New permissions would also be required in or adjoining centres, where there are few existing permissions.</p> <p>If delivery does not occur in South Bristol and at the centres to the extent envisaged, flexibility is provided through the potential existing in the City Centre stock of permissions.</p>
4.6	<p>South Bristol covers a large part of the City. I am concerned that BCS1/BCS8 provide little real steer as to where this 50,000m² of new office space should be accommodated (in so far as it is not suitably met from existing commitments) leaving an uncertain task for the allocations DPD. This uncertainty is exacerbated by the indication in BCS1 that a new centre (either on a new site or at an enhanced existing centre) may be appropriate in South Bristol. The location of offices should be related to the most accessible locations and any new centre would be an important factor. Whether or not there should be a new centre and broadly where it should be is a decision that should be made in the Core Strategy. The Council should give further thought to how a greater spatial steer might be introduced in relation to office provision in South Bristol and what clarity could be given</p>	<p>Office development in South Bristol will be an important component of regeneration of South Bristol, which is a regional priority. The Council considers that the Core Strategy strikes the right balance between a spatial steer for office development in South Bristol and appropriate flexibility for the market to deliver.</p> <p>Taking the Core Strategy as a whole, Policies BCS1, BCS7, BCS8 and BCS20 combine to provide a steer to the location of 50,000 m² of office space. The initial steer is to identify that 50,000 m² of the planned office provision for the city will be located in South Bristol. The South Bristol area is shown on the Key Diagram and a further diagram focuses on that area in greater detail. The delivery section of Policy BCS1 explains that office development will form part of major regeneration projects. The Policy identifies two major foci of regeneration at Hengrove Park and Knowle West. Hengrove Park, which is a destination on the proposed rapid transit system, is identified as including employment sites (office development has already been granted planning permission in the initial phases of that regeneration site). Policy BCS7 provides a general steer for office development by indicating that office developments are one of the appropriate uses within or adjoining centres. There are two 'town centres' within South Bristol and three 'district centres' (local centres are only likely to be locations for limited amounts of small office development). The emerging Site Allocations and Development Management Development Plan Document is due to be subject to consultation from June 2010. That consultation will be identifying proposals for</p>

	Inspector's comments and questions	Bristol City Council Response
	<p>about the need for and potential location of a new centre</p>	<p>significant office development locations in one of the town centres, at one of the district centres and at the Hengrove Park area of regeneration. Office development would be appropriate in principle at all the centres, subject to Policy BCS7, throughout the period of the Core Strategy.</p> <p>Office development is also associated in Policy BCS1 with a potential new centre in South Bristol. The approach to a potential new centre is explained above.</p>
<p>4.7</p>	<p>My third concern in relation to economic development is the potential implications of the loss of part of the St Phillip's Marsh PIWA to town centre uses and residential. (BCS1 proposes the extension of the town centre into this area north of the Feeder Canal and SHLAA site SH0033 has a notional capacity of 500 units.). The ELS indicates that the St Phillips Marsh PIWA (0019 p13) should continue to be safeguarded for industrial and warehousing purposes. The town centre/residential proposal would result in some existing industrial warehousing land being lost. <i>What consideration has the Council given to such losses for the success of the economic strategy?</i></p>	<p>The area affected by this proposal represents only a relatively small part of the city's total stock of industrial and warehousing land. To clarify, the area proposed as an extension to the city centre relates to the 14 hectare Avon Street area north of the Feeder Canal (identified in the ELS Annex A, p. 12) and not the 65 hectare St Philips PIWA south of the Feeder Canal, which will continue to be safeguarded. The area referred to is shown on the map at Appendix 10.</p> <p>It was noted by the ELS that the Avon Street area was not the strongest performing of the city's PIWAs due to the non-industrial uses which had been allowed on its western half and the relatively low quality physical condition of many of the premises within it.</p> <p>The proposal to expand the city centre into the St Philips area, north of the Feeder Canal, will assist in achieving a number of Core Strategy objectives, including its economic aims. The area has many attributes which make it an extremely sustainable location for the type of high density mixed-use development advocated by Policy BCS2. It is adjacent to Temple Meads – the city's main railway station – and therefore is a very sustainable location in terms of its sustainable transport accessibility. The area is also adjacent to Temple Quay – the city's new office and mixed-use quarter which has been very successfully developing over the past 15 years. As BCS2 promotes mixed-use development in this area, development proposals will be expected to provide new employment floorspace, specifically office floorspace as a 'town centre' use defined by PPS4. This is considered to be entirely appropriate in this accessible location. It will also help improve the city's economic strength by providing additional development land to strengthen Bristol's role as the region's office capital and as a nationally important location for the insurance, professional services and</p>

	Inspector's comments and questions	Bristol City Council Response
		<p>banking sectors. This new office floorspace will also provide significantly more jobs than are currently provided on the existing industrial area, characterised as it is with relatively low job density.</p> <p>The proposal is consistent with draft RSS policy HMA1 which calls for the expansion of the employment, service, retail and cultural roles of the city centre.</p> <p>Therefore, whilst a small quantity of the city's stock of industrial land will be lost through this proposal, the approach advocated by BCS2 is considered to have much wider benefits, including economic benefits, which significantly outweigh this loss.</p>
4.8	<p>Some representations express concern about the likely loss of rail maintenance depots, train stabling and sidings in the Temple Quay/St Phillip's Marsh Area from new development and the potential implications for the effective operation of increased rail services in the Bristol area (which are part of the overall transport strategy). What consideration has the Council given to the implications of such potential losses?</p>	<p>There is some existing rail land in the St Philip's area north of the Feeder Canal. This currently comprises two sidings and an undeveloped area currently used for road/rail vehicle parking and rail maintenance storage. Network Rail has informally indicated that the land may be required in the longer term for rail use. Its availability for development is, therefore, not assumed and any areas required for safeguarding would be indicated in the emerging Bristol Central Area Action Plan. Details would be arrived at in consultation with Network Rail. The use of the remainder of the area St Philip's area north of the Feeder Canal for main town centre uses would be unaffected, although the detailed development would clearly need to take account of surrounding uses. The area is shown on the map at Appendix 10</p> <p>Temple Quay is an area of office development to the north west of Temple Meads Station which has been developed in recent years in conjunction with the Regional Development Agency over a number of years. There are no rail sidings in that immediate location and it has not been identified by rail infrastructure providers as having any future role in the provision of rail passenger or freight services.</p> <p>The sidings in St Philip's Marsh south of the Feeder Canal are located within an industrial and warehousing area. This area would be safeguarded for rail use in accordance with Core Strategy Policy BCS10 and site safeguarding policies to be included in the Site Allocations and Development Management DPD.</p>

	Inspector's comments and questions	Bristol City Council Response
5	Finally...	
5.1	This note indicates that I have potentially significant concerns about the housing and employment elements of the Core Strategy (and I have yet to look closely at other key policy areas). My present intention is to proceed with the Pre-Hearing Meeting on 11 May and Hearings in the 2 nd part of June (as previously indicated) so that I can properly explore the inter-relationship between these and other areas. Any significant changes needed to remedy any unsoundness would emerge as a result of the hearings and require further public consultation. This would delay the finalisation of my report	The Council hopes that the information provided in this note is of assistance in clarifying many of the matters raised. The impact on the reporting timescale of any matters emerging through the hearings is noted.
5.2	If my questions and comments in this note alert the Council to the need for further evidence gathering or a pause for any other reason, please indicate this to me. There would be the possibility of converting the planned Pre Hearing Meeting to an Exploratory Meeting to discuss how the Examination might best proceed. Reasonable notice of such a change would need to be given to all parties. In response to any request from the Council, I would need to decide if this was an appropriate and necessary step on Monday 26 April 2010	<p>The Council does not consider that additional evidence gathering is required arising from these comments for the reasons set out in the information above.</p> <p>As indicated above a number of additional papers requested by the Inspector will be provided for the PHM.</p> <p>If any further information is required at this point, the Council will be please to provide it.</p>

Appendix 1 Additional Documents Provided:

The following documents have been added to the set of Core Documents.

Documents added following submission

CDE50	The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes – For Public Consultation July 2008
CDE51	The South West Regional Spatial Strategy: Schedule of the Secretary of State's Proposed Changes and Reasons - July 2008 http://gosw.limehouse.co.uk/portal
CDE52	Draft Regional Spatial Strategy for the South West Panel Report - December 2007
CDE53	Capacity Appraisal Studies Urban Extensions SE and SW of Bristol Bristol City Council January 2007
CDE54	West of England Joint Working April 2010
CDE55	Bath and North East Somerset Core Strategy Spatial Options – October 2009
CDE56	North Somerset Core Strategy Consultation Draft – November 2009
CDE57	South West Regional Spatial Strategy Proposed Changes Sustainability Appraisal: Final Report including Non-Technical Summary http://gosw.limehouse.co.uk/portal/regional_strategies/drss?tab=files

Appendix 2

Letter to Secretary of State and Resolution in respect of the RSS Proposed Changes July 2008

Wednesday 22 October 2008



Telephone: 0117 922 3932

The Rt Hon Hazel Blears MP
Secretary of State
Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU

Dear Hazel

Draft South West Regional Spatial Strategy – Proposed Changes

I am enclosing the response to the "Draft South West Regional Spatial Strategy - Proposed Changes" on behalf of Bristol City Council. As you may know, the Council has long supported the approach of the RSS to facilitate growth in the West of England as a key part of our strategy to achieve sustainable development focussed on the urban areas.

However, we have considerable concern, in particular about the increase in the scale of growth expected within the existing Bristol urban area, particularly as the Proposed Changes are silent on why these additional numbers are either appropriate, justified or deliverable. The Council is concerned that this may not be deliverable, and is also conscious that deliverability will be an issue in testing the soundness of our own Core Strategy which will need to be in general conformity with the adopted RSS. We are also concerned that the effect of the scale of the change at this stage, after consultation on Preferred Options which included a spatial strategy that could just accommodate the challenging recommendations of the Panel, will delay progress, contrary to the need and our will to expedite its adoption.

We recognise your request for the region to thoroughly investigate the infrastructure needed to accommodate growth. However, I should stress that in partnership with our West of England neighbours, we are committed to working with you in Government and with other agencies and funders to draw down the investment needed. This will enable us to both meet the current deficit and to allow us to move to a much more sustainable future.

There is also disappointment that the Panel's recommendations in respect of regional policies for sustainable construction and renewable energy have not been accepted.

C a b i n e t

The Council House
College Green
Bristol BS1 5TR

Leader of Council

Website
www.bristol-city.gov.uk

RESOLUTION AGREED AT FULL COUNCIL 14 OCTOBER 2008

REGIONAL SPATIAL STRATEGY (RSS)

“Council strongly supports many of the objections made by neighbouring Authorities and others to the proposed changes that the Secretary of State for the Department of Communities & Local Government proposes to make to the draft Regional Spatial Strategy (RSS).

In particular, Council considers the latest increase in Bristol's proposed housing target (to 36,500 new homes by 2026) as unrealistic and unworkable, especially given the time-scale involved and the current state of the housing market.

However, Council recognises the need to provide more affordable housing for the people of Bristol and the city region and supports the need to continue to be ambitious about delivering these homes where they are most needed.

Council reiterates its commitment to sustainable and balanced housing growth but considers the Labour Government's arbitrary increase in volume would have severe consequences for our quality of life, infrastructure and the land available for leisure and employment use. Council is particularly concerned that the Secretary of State's amendments place significantly less emphasis on redeveloping brownfield sites, appears to encourage unrestrained urban-sprawl and will result in the erosion of the Green Belt.

Council is also dismayed that previous sections of the RSS dealing with locally- devolved sustainability policies and transport initiatives - such as the creation of a strategic transport authority covering the sub-region - have been deleted by the Secretary of State.

Council is opposed to the weakening of measures to promote sustainability, in particular, boosting the generation of renewable energy and encouraging eco-friendly forms of construction. It views this as a potentially damaging step which could confuse the construction industry and scheme promoters.

Council calls upon the Leader to convey this Authority's opposition to these changes in the draft RSS, especially the revised and inflated housing numbers which we consider to be undeliverable, unsustainable and unacceptable.”

Appendix 3

Development Capacity of the Main Green Belt Areas in Bristol

Supplied as a separate paper

Appendix 4

Sustainability Appraisal of the SoS Proposed Changes – sustainability issues raised in relation to Area of Search B and urban extensions.

The SA Report does not contain a detailed appraisal of the increased number of dwellings proposed for Area of Search B to the south east of Bristol. However, the Report does highlight a number of issues with regard to the sustainability of Area B and urban extensions generally. These issues are, on the whole, consistent with the issues raised in the Council's SA of the Preferred Options Review.

SA report of SoS Proposed Changes		SA Report of Bristol City Council's Preferred Options Review
Paragraph 10.97	Appraisal against SA objective: Will the proposed changes maintain and improve environmental quality and assets? <i>"...while Areas of Search A,B and C in Bristol are not in flood risk zones, the RFRA notes that development in these areas could lead to a significant flood risk increase requiring on and off-site mitigation works."</i>	Score (-) <i>This is an issue which would need to be considered at the site selection stage. Some of the land within the area of search identified in the RSS for the south east urban extension is at risk of flooding, particularly in the future as a consequence of climate change. Therefore this approach is likely to have a negative impact upon this objective.</i>

<p>Paragraph 10.99</p>	<p>Appraisal against SA objective: Will the proposed changes maintain and improve environmental quality and assets? <i>“Area of Search B includes ‘notable’ biodiversity, landscape and built environment factors, which need to be taken into account, particularly as the Proposed Changes proposed 3000 more homes in this area of search that the Panel Recommendations.”</i></p>	<p>Score (-) <i>Both options for the south east extension would require the relocation of existing landuses such as the garden centre, allotments and cricket ground leading to the loss of the rural character of the area. Development in this location would therefore have an adverse impact on the designated historic landscape, Conservation Area, Wildlife Network and Listed Buildings.</i></p>
<p>Table 18.1</p>	<p>Appraisal against the detailed question: Will the RSS...Promote the conservation and wise use of land? <i>“... it is not clear how the presence of best and most versatile agricultural land has influenced the Areas of Search for urban extensions at the SSCTs, with several proposed development locations likely to lead to a loss of such land.”</i> <i>“The total built up area will increase by 5.0% under the Draft RSS and by 6.6% under the Proposed Changes. All of these changes have nudged the score in a more negative direction.”</i></p>	
<p>Table 18.1</p>	<p>Appraisal against the detailed question: Will the RSS...Protect and enhance landscape and townscape? <i>“...the Proposed Changes are even more likely to significantly affect the character of a large number of locations across the region.”</i></p>	
<p>Paragraph</p>	<p>Appraisal of Panel Recommendations Alternative:</p>	

10.104	<i>"Fewer dwellings [as proposed in the Panel Report] overall is likely to reduce the overall environmental impact, in terms of resource use (e.g. energy, water) and pressure upon existing environmental assets, particularly in the Green Belt associated with Bristol (Areas of Search B and C)..."</i>	
Paragraph 10.107	Appraisal of Panel Recommendations Alternative: <i>"...we consider the most sustainable approach would be to focus development and growth in Bristol city centre, leading to employment, leisure and retail facilities in more sustainable locations for access from existing and proposed housing development, and from elsewhere by public transport, walking and cycling."</i>	

The Sustainability Appraisal Report of the Proposed Changes to the South West RSS concludes that whilst the Proposed Changes are positive for housing availability (Paragraph 18.6), the scale of additional development will make it more difficult to achieve quality of life objectives and to deliver development within environmental limits (Paragraph 18.9). With regard to Areas of Search it concludes that whilst the Proposed Changes have sought to avoid the most environmentally sensitive locations, there remains potential for some direct impacts such as the loss of best and most versatile agricultural land (Paragraph 18.10).

Appendix 5

Minutes of HMP meeting

*Strategic Housing Market Assessment Partnership Meeting
Draft Minutes*

30th November 2009, Wilder House

Present:

Margaret Gibson, Mendip District Council
 Jane Alderman, Somer Housing Group
 Jon Shaw, South Gloucestershire Council
 Marie Price, Bristol City Council
 Joelle Moore, South Gloucestershire Council
 Richard Orton, South Gloucestershire Council
 Richard Walker, B&NES Council
 Michael Reep, North Somerset Council
 Laura Grady, West of England Partnership
 Simon Eames, Mendip District Council
 Michael Legg, Bristol City Council
 Hollie Bryant, West of England Partnership

1. Apologies: SW Councils, HCA, GOSW, James Ellis (Mendip), Kay Topazio (North Somerset Council).

		Action
2.	<i>Minutes of the last meeting and matters arising</i> Minutes of the previous meeting agreed. Group voted unanimously to sign off the SHMA report, regardless of the HBF's abstention from the process.	
3.	<i>Proposed process addendum to the SHMA</i>	

	<p>Margaret has received an email from the HBF which confirms they could not sign off the report due to resource constraints rather than any issue with the quality of the SHMA itself. However, the email is not explicit enough to take to a public inquiry, therefore Margaret proposed a process addendum explaining what has happened since SHMA completion be attached to the report. The group unanimously agreed to the proposed addendum.</p>	
4.	<p><i>Monitoring the SHMA</i></p> <p>Laura introduced a paper which explains why we need to monitor the SHMA and suggested an annual monitoring report of key variables as a proportionate course of action. The report will be prepared during December/January of each year to allow the most recent data from CLG and AMRs to be incorporated and presented to this group for approval in March, before incorporation into LA's AMRs as appropriate.</p> <p>The group considered the proposed list of indicators. Laura explained that the main difference between the proposed monitoring indicators and the data fed into the SHMA report is the lack of detailed study on housing registers and waiting lists. In addition, modelled figures were fed into the SHMA which cannot be replicated in the monitoring report.</p> <p>Richard Orton highlighted the importance of analysing the implications of the indicator data so as to build a picture of the current state of the HMA, and stressed that the monitoring report should be proportionate; it is not seeking to replicate the SHMA. Based on her experience of monitoring Somerset's SHMA report, Margaret reiterated the importance of analysing the data. It is therefore proposed that the WofE Partnership Office prepares the monitoring report and seeks assistance from LA planning and housing officers in analysing the data.</p> <p>The report will monitor the progress of actions suggested by the SHMA e.g delivery of affordable homes through the planning system, as well as the validity of the underlying assumptions of the study; however, the original indicators fed into the SHMA are fairly 'future-proof' therefore little change is expected.</p> <p>The LAs have purchased Hometrack data. The training session is scheduled for January; therefore the data will be included in the current report if possible.</p>	
5.	<p><i>Update on SHLAAs</i></p>	

	<p><i>Bristol</i></p> <p>Michael Legg circulated a draft version of Bristol's SHLAA report prior to the meeting in order to seek sign-off from the group. The final report was circulated at the meeting, and is available online, but contains few changes from the draft.</p> <p>Michael gave a brief presentation on the process and outcomes of the report.</p> <ul style="list-style-type: none"> - The SHLAA has been undertaken in support of Bristol's Core Strategy, which is due to be published soon and sets out plans for 30,000 new homes. - The SHLAA gives estimates of the number of dwellings likely to come forward in 5-year tranches up to 2026. It has identified a total 30,200 dwellings from developable sites over this period. - The deliverable 5-year housing supply is based on planning permissions and developers with planning permission questionnaire, which asked when their sites were likely to come forward. - Call for sites last year identified 600 sites. - In order to ensure the project was manageable Bristol set a site density threshold of >10 dwellings; this brought the database of survey sites down from 1000 to 650. - Sites on Greenbelt land and sites safeguarded for industrial warehouses were excluded. All sites in Flood zone 3 were excluded, however, unable to find provision for 30,000 dwellings without looking in Flood Zone 2. - The outcomes of the report will feed into other work such as ward based population projections and planning for education. - Annex B is a site schedule that lists the phasing of all allocated sites post 2016. The phasing of all other sites pre-2016 will be included in a separate document. A single GIS database of all sites on a single year basis is available and will aid aggregation of figures at the sub-regional level. <p>Margaret asked the group if they were happy to consider sign-off of Bristol SHLAA today – no objections. The ensuing questions and discussion revealed that:</p> <ul style="list-style-type: none"> - Whilst Bristol's Core Strategy sets the political and policy context for the SHLAA, they have not worked to a specific dwelling target. The number of deliverable dwellings over the first 15 years can be demonstrated successfully against any 5 or 15-year target due to Bristol's above target annual completion rate in recent years. - PPS3 doesn't allow for inclusion of windfall, but Bristol has identified 400 small sites as a contingency plan. South Gloucestershire plan to include a small site allocation via the Area Green Space Plan and 	
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<p>Laura suggested there might be a case for inclusion of small sites at the strategic level.</p> <ul style="list-style-type: none"> - Bristol have sought guidance from developers via their questionnaire stage; despite receiving a limited number of responses some minor changes have been made as a result of comments. Difficult to judge the reliability of responses in market terms, especially in the current economic climate; developers information was often contradictory to landowners views. - Viability studies have been undertaken at LA and sub-regional level. BCC's viability study looked at a multitude of options and revealed that the percentages set out in the SHLAA are viable. - Bristols methodology is consistent with WofE guidance to allow aggregation at sub-regional level. <p>Group vote on sign-off of Bristol' SHLAA revealed unanimous support and no abstentions.</p> <p><i>B&NES</i> Richard Walker gave an update on B&NES SHLAA, due to be published in draft form before Christmas. The report is based on draft RSS figures, but uses a different geographical distribution, which excludes land around Hicksgate and Keynsham. B&NES will keep the group informed of progress.</p> <p><i>Mendip</i> Simon informed the group that Mendip are currently in the process of undertaking a second review of their SHLAA; a call for sites is being undertaken again this year to keep the information up to date. Aiming for completion mid-February, to be circulated and considered before seeking sign-off from this group in March.</p> <p><i>South Gloucestershire</i> Richard Orton gave an update on South Gloucestershire's SHLAA. Work is ongoing; the report will reflect South Glos's Core Strategy pre-submission housing numbers and be published as per the LDF timetable.</p> <p><i>North Somerset</i> Michael Reep informed the group that North Somerset's draft Core Strategy is currently out for consultation; the review will hopefully be ready to present to the HMP in March. North Somerset is working on a trajectory for the district, as well as individual trajectories for each urban extension.</p> <p><i>Wiltshire</i></p>	
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	<p>No representatives from Wiltshire were present, Margaret therefore read a note from Neil Tiley. Currently two separate SHLAAs cover Wiltshire. Wiltshire will review the methodology with surrounding areas and undertake a SHLAA for the new Unitary Authority.</p> <p>Wiltshire has set up its own HMP, from whom sign off on the SHLAA will be sought, however, the results will be presented to the WofE HMP.</p>	
<p>6.</p>	<p><i>Future working arrangements including future role and membership of the Partnership</i></p> <p>The Project Team proposed an annual meeting of the Partnership was necessary to sign-off the SHMA AMR and LA's SHLAAs. The Project Team will meet more regularly, as required by the monitoring tasks. No objections were made to these arrangements.</p> <p>Michael Legg suggested a SHLAA working group might be useful. Laura to revitalise this group.</p> <p>The group reviewed the membership list of the HMP. The list was trimmed to two officers for each LA (one housing, one planning). The group agreed to reinstate the HBF contact on the basis that they are listed within the SHMA partners list. Laura to chase HBF for either a WofE representative within their resources or nomination of another representative for the development industry. See updated membership list attached.</p> <p>Jon questioned the appropriateness of Project Team members also sitting on the HMP. Action to review the terms of reference of the HMP at the next meeting.</p> <p>Richard Orton questioned the progress of a CLG study into the boundaries of housing market areas. Laura to chase.</p>	<p>LG</p> <p>LG</p> <p>ALL</p> <p>LG</p>

Appendix 6

A breakdown of SHLAA sites with the proportion of land within Flood Zones 2 and Flood Zone 3 is provided in the table below. The illustrative capacity assumption is based on parts of sites and has taken flood risk into account.

Site Reference	Name	Hectares	Illustrative Capacity	Flood Zone 2 %	Flood Zone 3 %
SH0031	Redcliff Wharf Redcliff Way Redcliffe	0.7	10	42	33
SH0033	St Philips	13.8	500	47	26
SH0086	Central Trading Estate, Bath Road, Arnos Vale	4.0	321	25	24
SH0090	Former Texico PFS, Bath Rd	0.5	50	17	15
SH0027	Bristol General Hospital	1.0	150	10	7
SH0038	Peugeot Dealership, Clarence Rd	0.6	60	13	7
SH0071	Former Diesel Depot, Bath Road, Totterdown	3.7	150	4	4
SH0040	Land East of Temple Quay House, The Square, Temple	1.1	50	3	2
SH0094	Land off Bishport Avenue, Hartcliffe (Section of Valley Walk - PGSS)	1.0	62	1	0
SH0029	Land bounded by	0.4	50	100	0

	Nelson St, Union St & Silver St				
SH0026	Broadmead	2.0	200	75	0
SH0013	Avon Way - Land At / SITA Depot / Eldred Close/Druid Stoke Avenue - Land At Rear Sea Mills Lane	1.0	50	59	0
SH0063	Alderman Moores, Ashton Vale	4.5	137	31	0
SH0035	Central Fire Station	0.9	178	20	0
SH0062	Former Engineers Depot, Clamage Road, Bower Ashton	1.8	144	10	0
SH0002	Lawrence Weston PRC	10.1	99	7	0
SH0034	Dove Lane	5.0	476	6	0

Some 29 hectares of land within the SHLAA were Area Green Space Plans sites and not individually identified. 6.8 hectares of this land is within Flood Zone 2 and 1.1 hectares within Flood Zone 2.

Appendix 7

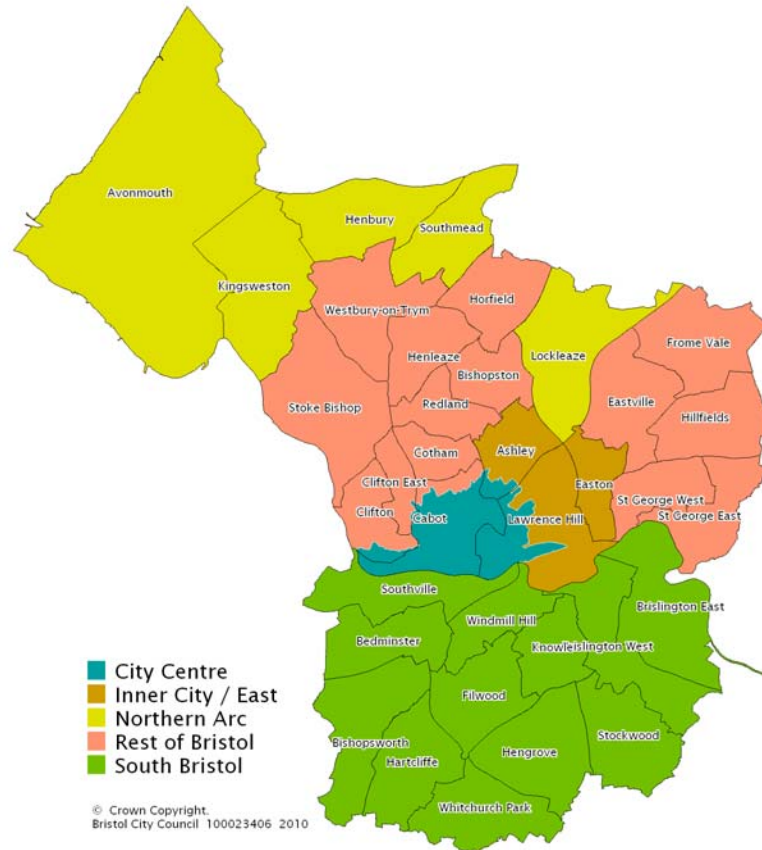
Five Year Supply Calculations

	Year	Bristol 2009 Trajectory	RSS Panel Report (30,000)	RSS Proposed Modifications (36,500)
Completions	2006/07	2,052	2,052	2,052
	2007/08	2,411	2,411	2,411
	2008/09	2,574	2,574	2,574
5-Year Housing Supply	2009/10	2,548	1,351	1,733
	2010/11	1,972	1,351	1,733
	2011/12	1,884	1,351	1,733
	2012/13	1,514	1,351	1,733
	2013/14	1,056	1,351	1,733
	2014/15	1,437	1,351	1,733
	2015/16	1,135	1,351	1,733
	2016/17	1,394	1,351	1,733
	2017/18	1,169	1,351	1,733
	2018/19	1,172	1,351	1,733
	2019/20	1,171	1,351	1,733
	2020/21	1,169	1,351	1,733
	2021/22	1,113	1,351	1,733
	2022/23	1,114	1,351	1,733
	2023/24	1,115	1,351	1,733
	2024/25	1,114	1,351	1,733
	2025/26	1,112	1,351	1,733
Completions	Subtotal 2006/07 to 2008/09	7,037	7,037	7,037
5-Year Housing Supply	Subtotal 2009/10 to 2013/14	8,974	6,755	8,665
	TOTAL	30,226	30,000	36,500

The 5 year supply 2009-2014 is based on the Draft RSS Panel report provision of 30,000 dwellings for the period 2006-2026 (January 2008). This is the five year period reported upon in the 2009 Annual Monitoring Report which covers the period 1 April 2008 – 31 March 2009. The housing supply trajectory alongside the RSS Panel Report and RSS Proposed Modifications is provided below.

Appendix 8 - City Area Schedule

		2006-11	2011-16	2016-21	2021-26	TOTAL
City Centre	Completions	1,532	0	0	0	1,532
	Commitments 2009	1,412	2,978	150	0	4,540
	SHLAA 2009	0	19	766	1,434	2,219
	TOTAL	2,944	2,997	916	1,434	8,291
Inner City / East	Completions	697	0	0	0	697
	Commitments 2009	536	632	0	0	1,168
	SHLAA 2009	0	59	75	24	158
	TOTAL	1,233	691	75	24	2,023
Northern Arc	Completions	934	0	0	0	934
	Commitments 2009	500	607	79	0	1,186
	SHLAA 2009	0	0	768	926	1,694
	TOTAL	1,434	607	847	926	3,814
Rest of Bristol	Completions	1,991	0	0	0	1,991
	Commitments 2009	1,148	1,162	0	0	2,310
	SHLAA 2009	0	0	203	881	1,084
	TOTAL	3,139	1,162	203	881	5,385
South Bristol	Completions	1,883	0	0	0	1,883
	Commitments 2009	924	1,569	0	0	2,493
	SHLAA 2009	0	262	3,772	2,303	6,337
	TOTAL	2,807	1,831	3,772	2,303	10,713
TOTAL	Completions	7,037	0	0	0	7,037
	Commitments 2009	4,520	6,948	229	0	11,697
	SHLAA 2009	0	340	5,584	5,568	11,492
	TOTAL	11,557	7,288	5,813	5,568	30,226



Appendix 9

Employment floorspace

Net additional B1a office floorspace (square metres)

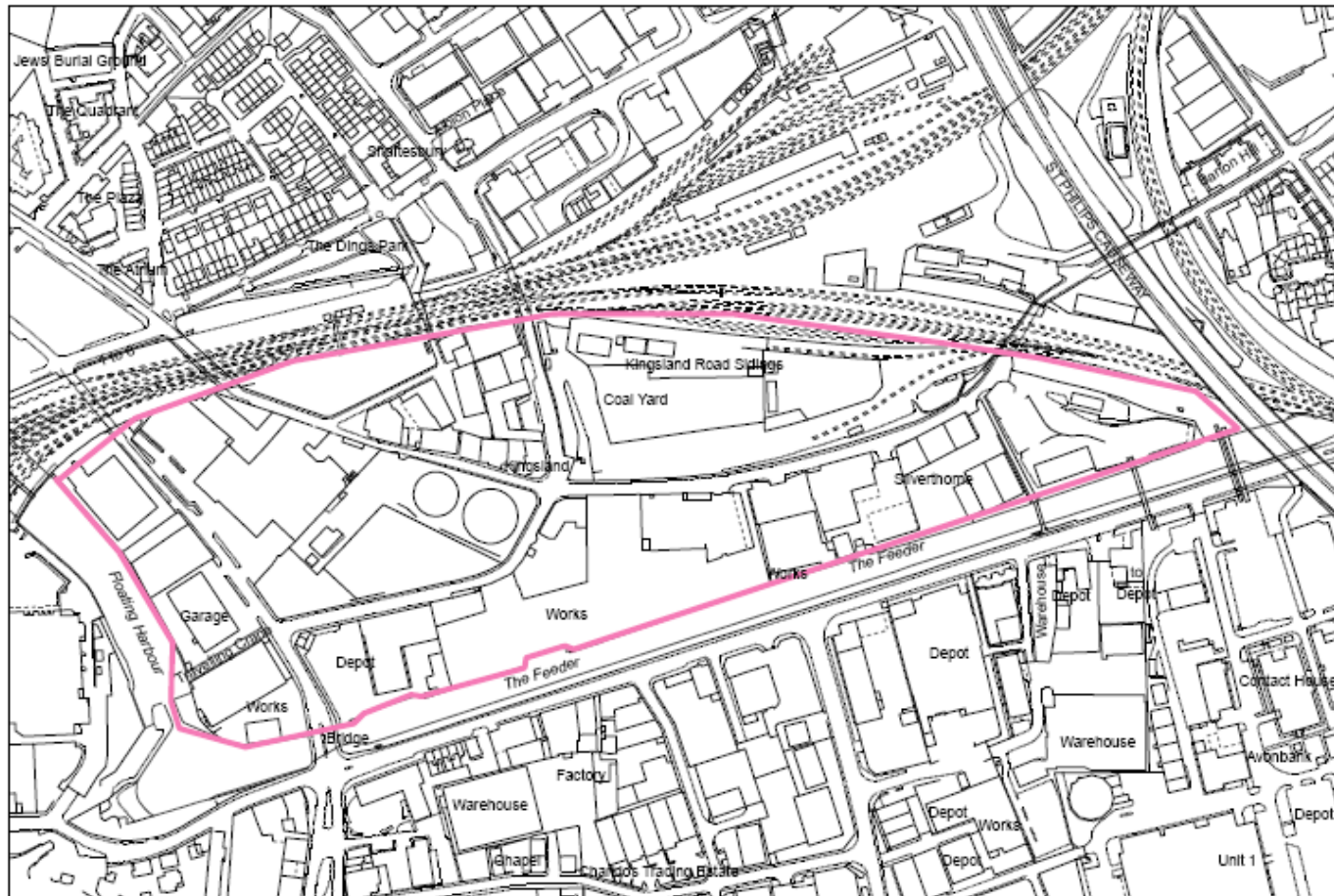
	Completions			Total	Target 2006-26	% delivery	Pipeline		% delivery
	2006-7	2007-8	2008-9				Apr-09	Total	
city centre	-12,149	40,926	-21,137	7,640	150,000	5%	247,532	255,172	170%
south (including centres)	2,705	-1,406	-1,176	123	50,000	0%	36,717	36,840	74%
south (excluding centres)	3,800	-1,022	-1,240	1,538	50,000	3%	36,350	37,888	76%
centres (including south)	-1,095	-938	-30	-2,063	36,000	-6%	2,595	532	1%
centres (excluding south)	0	-554	-94	-648	36,000	-2%	2,228	1,580	4%
elsewhere (north excluding centres)	1866	2593	8417	12,876	n/a	n/a	-16,327	-3,451	n/a
Bristol total	-7,578	41,559	-13,990	19,991	236,000	8%	270,150	290,141	123%

Gross gains of B1a office floorspace (square metres)

	Completions			Total	Target 2006-26	% delivery	Pipeline		% delivery
	2006-7	2007-8	2008-9				Apr-09	Total	
city centre	5,718	45,068	16,347	67,133	150,000	45%	311,052	378,185	252%
south (including centres)	4,122	316	249	4,687	50,000	9%	38,249	42,936	86%
south (excluding centres)	4,122	0	0	4,122	50,000	8%	37,499	41,621	83%
centres (including south)	943	316	615	1,874	36,000	5%	8,010	9,884	27%
centres (excluding south)	943	0	366	1,309	36,000	4%	7,260	8,569	24%
elsewhere (north excluding centres)	1866	7523	9267	18,656	n/a	n/a	16,327	34,983	n/a
Bristol total	12,649	52,907	26,229	91,785	236,000	39%	372,888	464,673	197%

Appendix 10

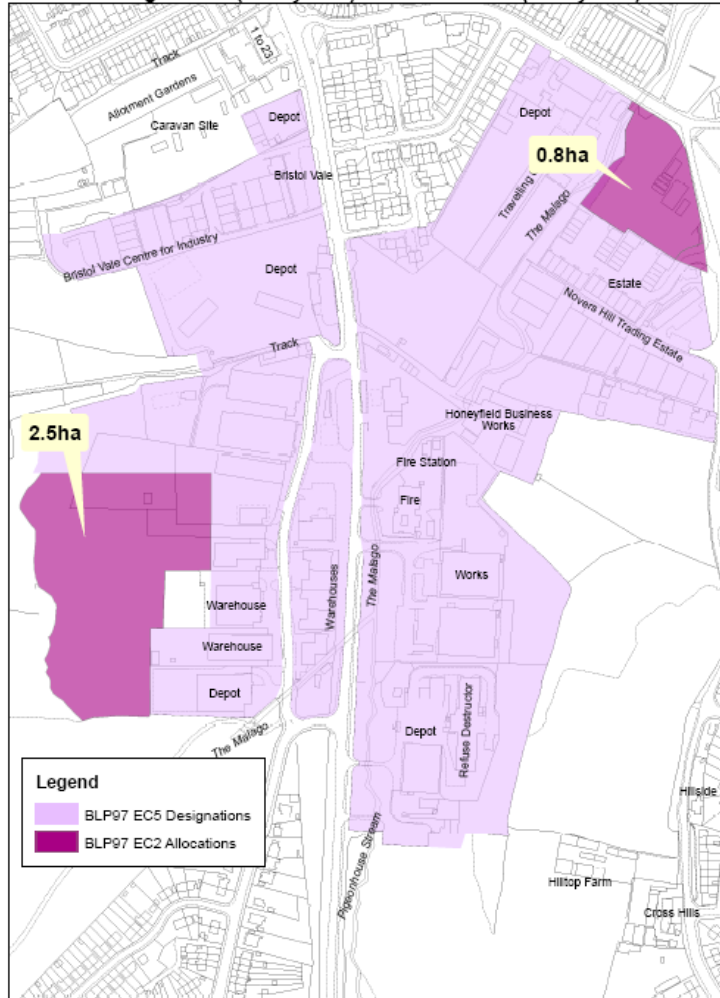
Aerial Photo showing 'St Philips area, North of the Feeder Canal' - Bristol Core Strategy Policy BCS2



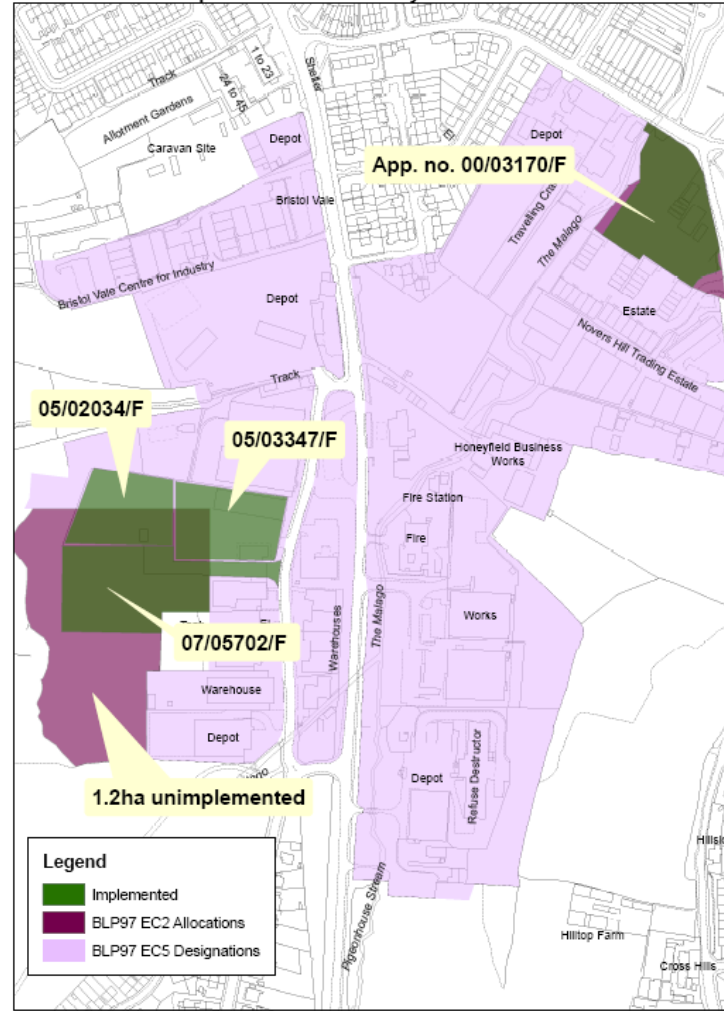
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Appendix 11

**Plan 1 - Extract from Bristol Local Plan 1997 Proposals Map
Novers Hill / Vale Lane Principal Industrial and Warehousing Areas
Designations (Policy EC5) and Allocations (Policy EC2)**



**Plan 2 - Extract from Bristol Local Plan 1997 Proposals Map
Novers Hill / Vale Lane Principal Industrial and Warehousing Areas
Implementation of Policy EC2 Allocations**



Plan 3 - Novers Hill / Vale Lane Principal Industrial and Warehousing Areas
Area of search for new PIWA allocations and draft new PIWA designations

