

## **BRISTOL CORE STRATEGY EXAMINATION**

### **INSPECTOR'S NOTE - FOLLOW-UP TO HEARING SESSION 7 SEPTEMBER 2010.**

1. As indicated at the end for the hearing on 7<sup>th</sup> September, I invited the Council to undertake further work as follows:

- a) A Position Paper on overall Housing Provision to address:
  - The Council's assessment (on the currently available evidence as explored at the hearing) as to the likely housing need and demand over the plan period.
  - The identification of the likely gap between housing supply and need/demand.
  - The consequences of not being able to bridge the (likely) gap and the implications for and consistency with the stated aims and objectives of the Core Strategy.
  - The above to include an explanation of the Council's understanding/position of how this matter affects Bristol's role within the sub-region.
- b) A clearer explanation of the implications for the overall housing land supply of the reductions in housing delivery set out in the Council's statement of 20 August 2010, as a result of the reassessment of flood risk and delivery in the renewal areas of South Bristol (eg an expanded version of the table circulated at the hearing to show what figures have been added and subtracted).
- c) Consistent with the above, paragraphs of new proposed changes which could be inserted in the Core Strategy in section 4.5 which summarise the key points about need/demand, land supply, the gap and the consequences/implications and an updated table on the housing supply position (the latter would be much simpler than the information requested above.)
- d) A further reworking of the Flood Risk Sequential Test Paper, which starts with an assessment of land in flood zone 1 and works through the zones of increasing risk. In assessing capacity in zone 1, the paper should acknowledge that there is some capacity within the Green Belt, but that it is the Council's policy choice not to propose housing there. The paper may need to acknowledge the lack of evidence for flood zone 2 with climate change. The Council should consider whether some of the wording in the Paper could be rephrased to overcome the concerns expressed in the email from the Environment Agency (6 September) circulated at the hearing.

2. As discussed at the hearing, I still have concerns about the use of 2 housing figures in policy BCS5. However, if the Council intends to retain the present proposed change which distinguishes between a minimum delivery of 26,400 and an aspiration of 30,000, I would ask the Council to look again at the proposed wording in policy BCS5, since the evidence indicates that the Council could not necessarily identify sufficient land to allow for the delivery of 30,000 (eg because of flood risk in the city centre). Some other expression is needed to explain how the Council envisages this aspiration being implemented. I would also suggest that

the table in the policy should contain an additional column showing the Council's minimum commitment to delivery in the different spatial areas (consistent with how those other policies are proposed to be changed). This breakdown could then form a logical set of targets against which to monitor implementation of the policy.

4. As I indicated yesterday, participants at the hearing will be invited to comment on the Council's further papers. I will then decide how to proceed. If I consider that the Core Strategy might be able to be made sound with proposed changes, I will invite the Council to publish for formal consultation proposed changes (which may include my additions or alterations to the Council's schedules). I will need to take into account any new representations received. If I consider that there is unsoundness which could only be remedied by a substantial change of strategy imposed by me against the Council's wishes, I would alert the Council, so it could consider whether it wanted me to proceed with the Examination (to avoid potentially wasted time and effort by all parties).

5. For information, the document reference handed to me by Mr Daniels (Pegasus Planning) at the end of the session is: National Housing and Planning Advice Unit: *Rapid Evidence Assessment of the Economic and Social Consequences of Worsening Housing Affordability* May 2009 available at the archived web address for NHPAU: <http://www.communities.gov.uk/nhpau/keypublications/research/affordabilityrea/>

6. On a separate matter, I also highlighted yesterday the recent Ministerial Statement relating to Circulars 1/2006 and 4/2007. See <http://www.communities.gov.uk/news/corporate/1700758>

I invite comments from the Council (and any others who made representations on this policy) on any implications of this announcement for the soundness of policy BCS19 and of the Council's proposed change to this policy. The Council should also inform me if any recent decisions by the Council materially alter the evidence before me when policy BCS19 was discussed in June.

**Simon Emerson**  
**Inspector**