

## **BRISTOL CORE STRATEGY EXAMINATION INSEPECTOR'S HEARING AGENDA**

### **Issue 2, Part 1, Housing - Tuesday 22 June**

#### *Relationship to emerging RSS and Overall Provision*

1. As explained in my note of 1 June, I am postponing discussion of this part of Issue 2 (my questions 2.1-2.7 of 13 May 2010) to a later hearing occasion (date yet to be confirmed), which will follow the Government's promised further statement on the matter. The discussion of the other aspects of Issue 2 will need to be undertaken against an uncertain backdrop. Nevertheless, I wish to explore thoroughly the robustness of all the different components of housing supply (or potential components), even though some parties may anticipate some components not being required. I also still wish to explore elements that make up the housing contingencies set out in the Core Strategy, but I have postponed discussion in relation to urban extensions and the Green Belt. The Core Strategy links these contingencies to any failure to deliver on planned provision and are not solely related to the housing requirement in the emerging RSS.

#### *Revised PPS3*

2. The Government published on 9 June a revised version of PPS3 with the following amendments:

- the definition of previously developed land in Annex B now excludes private residential gardens; and,
- the national indicative minimum density of 30 dwellings per hectare is deleted from paragraph 47

3. I ask below whether this change has any significance for expected delivery in accordance with the Core Strategy. If there appears to be new issues requiring fuller discussion, I will include this topic in my new hearing session on the abolition of Regional Spatial Strategies.

#### *Main Discussion*

*The robustness of supply for a minimum 30,000 dwelling proposed in BCS5.*

#### *Existing permissions/5 year supply*

4. (See my previous Qs 2.8.2.9) The Council has treated all planning permissions for housing as *deliverable* (as defined in PPS3 paragraph 54) except those few sites (amounting to 155 dwellings in total) that developers indicated were unlikely to be developed and which the Council allocate to the next 5 year period. Whilst (in the absence of evidence to the contrary for particular sites) it is reasonable to treat sites with planning permission as *suitable*, this is only one aspect of deliverability. I am still unclear on what basis/evidence/assumptions the Council has considered sites as *available* and *achievable*. I previously asked about viability because if a site is not viable, it will not be achievable. I want the Council to explain further the basis of its reasoning and to discuss whether this is a reasonable approach.

5. If I were to conclude that the Council has been less than thorough or unrealistic in its assessment of delivery from planning permissions, what would be a reasonable, broad brush conclusion from the available evidence as to likely delivery from this source? If I were to conclude that deliverability has not been assessed robustly, would applying a past lapsed rate of permissions be a reasonable substitute. What is the past lapse rate?

## *SHLAA*

6. (See my previous Q2.12 on density assumptions). I remain unclear as to what density assumptions have, in practice, been made in assessing the capacity of sites in the SHLAA and whether those assumptions are reasonable. Did the density diagram on p5 of the SHLAA inform assessments in any way and, if it did, is it compatible with density policy BCS20 and the diagram/examples at 4.20.1 of the Core Strategy? How do these relate to the table of SHLAA site densities in the Council's statement on issue 2.1? On large, mixed use sites is an average density based on the total site area a meaningful guide to density for comparison with policy BCS20?

7. Overall, does the SHLAA reflect realistic densities consistent with the Core Strategy's intentions?

8. I am unclear as to the Council's answer to my Q2.15 (Council's statement paras 14 and 15). How many sites (with what capacity) were dropped after application of the matters at 9.2-9.5 of the SHLAA? (I simply want to understand whether the stated sieving process made any difference.)

9. Have any of the sites in the SHLAA not been carried forward into the Site Allocations and Development Management Options Document (SADMOD) or have had their capacities changed? Have any new sites, not in the SHLAA list, been allocated for residential development. (I have asked the Council to produce a schedule highlighting these matters by Thursday 17 June).

10. To what extent has publication of the SADMOD confirmed or undermined expected housing delivery from identified urban sites as anticipated in the Core Strategy?

11. Is increased capacity from the redevelopment of Precast Reinforced concrete houses realistic in the light of the current uncertainty? (My Q 2.16/Council's statement 16-17.)

12. The SHLAA includes indicative provision of 1,100 dwellings arising from the release of poorer quality open space. Are there reasonable prospects of broadly this scale of housing being provided from this source (whether consisting of the sites currently suggested or from other open space land)? (I have asked the Council to produce by Thursday 17 June a schedule highlighting the sites identified in the about to be published draft Area Green Space Plans for possible housing and which, if any, are allocated for development in the SADMOD).

### *Components of the proposed contingencies.*

13. This discussion will not focus on the whether there should be a contingency in relation to the RSS, but whether these highlighted possible sources of additional housing would be a realistic and appropriate source of supply whether as an integral part of provision, a contingency or as a more general indication of flexibility.

### *Small sites and subdivisions*

14. The estimate of the number of years from these sources was derived by discounting 3 years from 31 March 2008 to avoid doubling counting with existing planning permissions (Council's statement 2.1, paragraph 19). However, the SHLAA incorporates the 5 year housing supply calculated as from 31 March 2009 so there would seem to me to at least one year of doubling counting on the basis of the Council's approach. Furthermore, Table 1 in CDE9 shows delivery from

small site planning permissions spread over a 5 year period to 31 March 2014. So there would appear to be double counting if delivery from the future small sites estimate was treated in a comparable way. Council to consider further for discussion at the hearing.

15. The Core Strategy states that this source of supply would not be relied on until 2021, but ascribes to it a calculation based on delivery over a 15 year period. Small windfall planning permissions can be counted as part of housing supply on an annual basis through the AMR as they occur, but if any reliance needs to be placed on anticipated windfalls within the first 10 years from adoption, PPS3 (paragraph 59) requires robust evidence of genuine local circumstances that prevent specific sites being identified. I do not understand what position the Council is adopting in relation to this requirement. In my view, if there are no such local circumstances then any contribution from small site windfalls should be confined to what would be delivered in the 5 years post 2021. Discussion.

16. Irrespective of the period over which a small sites windfall contribution might be justified is the Council's assessment of a total of 300 dwellings per annum from these sources reasonable?

17. Will the recent change to PPS3 (9 June 2010) - the exclusion of residential garden land from the definition of brownfield and the removal of a national indicative minimum density make any difference to likely delivery from this source.

*Housing on industrial land.*

18. I remain unclear whether and, if so, how the Council has estimated that up to 1,700 dwellings could come from this source. The figure appears to have been based on the scale of additional housing that might be required rather than what might realistically be available from this source of land (eg see Preferred Options Review - CDE44 - paragraph 3.88)? Council to explain. Has there been any assessment of which Principal Industrial and Warehousing Areas (PIWAs) might be suitable for mixed use redevelopment or essential to be retained with their designated status?

19. Could achieving delivery of 1,700 dwellings from this source mean that some fit for purpose designated PIWAs had to be redeveloped (given that the Employment Land Study found most PIWAs worthy of continuing with their present designation)?

20. Mixed use redevelopment is envisaged. Would the employment element remain B2 or B8 or be changed to B1 offices? (Para 3.88 of CDE44 refers to "more employee intensive uses such as offices")? (I will explore under Issue 3 the implications of the potential loss of land suitable for B2/B8 uses.)

21. The Council wants to change the first sentence of 4.5.14 to make clear that this source is envisaged as coming from the designated PIWAs. If this source of supply is needed (and its consequences acceptable) why should it come only from designated PIWAs and not also from a more relaxed approach to the retention of non designated employment sites?

22. Are the criteria listed in 4.5.14 of the Core Strategy adequate and appropriate for guiding the choice of sites to allocate if such a source is required?

*Broad locations*

23. If I were to conclude that there are not sufficient identified sites to meet required housing provision (whatever I eventually conclude that should be), are the 2 potential sources of supply discussed above compatible with the advice in PPS3, particularly about the identification (paragraph 55)? Are there any other potential broad locations that should have been evaluated or which could be referred to? (Potential use of the Green Belt will be discussed at a later hearing.)

*End of session*

**Simon Emerson**  
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**14 June 2010**