

BRISTOL CORE STRATEGY EXAMINATION INSEPECTOR'S HEARING AGENDA

Issue 2, Part 2, Housing - Wednesday 23 June

1. In accordance with my note of 14 June, I have postponed discussion of urban extensions and the Green Belt until there has been a further announcement from the Government about the abolition of Regional Spatial Strategies and any transitional arrangements which might apply. (My Questions 2.48-2.65 will thus be held over for another occasion.)

Flood risk (housing)

The sequential test

2. My preliminary view is that the choices for the location and scale of housing development made in the Core Strategy should be guided by the sequential approach of PPS25 and that sufficient reasoning about the application of this policy to Bristol should be included in the text of the Core Strategy to make clear that this has been done and what are the key points justifying any need to allocate sites outside flood zone 1. My understanding is that the Council does not disagree with the need to do this more fully than is currently the case. Is this correct?

3. The Core Strategy currently gives the impression of the sequential test being deferred to the site allocation stage. I consider that this is unsound because the strategic choices made about the location and scope of development will restrict the necessary flexibility when applying the sequential test at a later (eg site allocation) stage. Any discussion?

4. At 2.35 of my previous questions, I indicated that the sequential test and (if necessary, exception test) should be applied on the basis of flood risk including climate change. I had not regarded that view as controversial, given the thrust of PPS25 which seeks to minimise flood risk, the intended uses of SFRAs to inform spatial planning, the importance of SFRAs addressing climate change when assessing flood risk, and because if the sequential test is met, an important element of the exception test would be that the development would be safe over its lifetime (which would include consideration of climate change). The position would seem to be summarised at 3.99 of the *Practice Guide* to PPS25. The Council consider that this is not the intention of PPS25, since the EAs Flood Zones Maps could be used for sequential testing (PPS25, D4). In my view, whilst the use of these maps might be necessary in the absence of better information, the maps are not the preferred or only intended source of information on flood risk. What are the views of other parties, particularly the Environment Agency (EA) on the flood zones to be used when applying the sequential test?

5. The new text suggested by the Council to explain the sequential test (4.16.4A) makes 2 points. Firstly, that the SHLAA suggests that it would be unlikely to deliver 30,000 homes on land only in Flood Zone 1. But as the SHLAA had excluded locations where there might be land for housing in Zone 1, such as the Green Belt, this explanation seems inadequate. Secondly, the text refers to no housing proposed on land in flood zone 3. But if climate change has to be taken into account in applying the sequential text, this would not be correct. I invite the Council to provide a fuller/revised explanation/justification, for discussion.

6. Overall, is the sequential test met for the scale of housing proposed in higher flood risk zones in the city centre and elsewhere in the urban area?

The exception test

7. My understanding of PPS25 is that conventional dwellings (other than basement dwellings) are classified as “more vulnerable” and are acceptable in Flood Zone 2 provided the sequential test has been applied, but should be permitted in Flood Zone 3a only if the sequential and exception tests are passed. Some of the Council’s statement on this matter (eg paragraph 12) implies that the exception test would need to be applied to sites in Flood Zone 2. Is this actually the case? (If not, suggested new text paragraph 4.16.4C will also need to be corrected.)

8. It is inappropriate/impractical for the exception test to be applied in detail at the Core Strategy stage since it requires the individual assessment of sites/scheme design. But uncertainty about whether and, if so, how the exception test would be met on SHLAA sites in zone 3 means that the housing capacity/development potential of such sites must also be uncertain at this stage. Discussion.

9. Whether or not I am correct as to the use of climate change flood zones in relation to the sequential test, it appears agreed that climate change flood risk should be taken into account in applying the exception test. The table in the Council’s statement after paragraph 14 indicates that about 830 dwellings on city centre SHLAA sites would be in FL3 (with climate change). These developments would need to pass the exception test. Whilst this might be readily accommodated on sites with only a small % of this flood zone, the largest sites (which are most critical for delivery) have all or most of the land within this higher risk zone.

10. Are there reasonable prospects for the delivery of the development capacity expected by the Core Strategy from the City Centre given the climate change flood risk implications for some of the SHLAA sites? Can the Council provide any greater clarity as to the deliverability (technical solution/available finance/timescale) about the flood prevention measures referred to in paragraph 9 of the Council’s statement?

11. Should policy BCS2 (City Centre) make explicit that flood mitigation measures, including off-site infrastructure projects, will be required to deliver the housing capacity envisaged in the policy? (Contrary to what is said in the statement from RPS on behalf of Places for People (1878), I had not previously intended to suggest that the Core Strategy should repeat national policy advice on either the sequential or exception test. My concern is whether the Core Strategy should more fully acknowledge the infrastructure that may be needed to deliver the requirements of the exception test in the City Centre, or elsewhere.)

Housing delivery by area

South Bristol

12. The following questions concerning the report by Roger Tym and Partners and the Single Conversation Investment Plan are applicable to delivery in other areas, but are particularly relevant here.

13. The report by Roger Tym and Partners *Responding to Infrastructure Delivery and Planning Issues in the West of England* May 2010 (CDE79 & 80) has only been published very recently. My impression is that most of the work was

undertaken about a year or so ago. When were the draft conclusions first available to the Council?

14. What regard has the Council had to the emerging and final conclusions of this report in assessing the deliverability of new housing on major sites in Bristol?

15. What is the significance of the conclusions of this report in relation to delivery of major sites?

16. Is the housing/delivery trajectory in the Core Strategy for South Bristol consistent with the timescale/trajectory for South Bristol in section 11 of the report (the traffic light chart)? If not, how is any difference explained and what are the consequences?

17. Does the report's cautious approach to the viability and delivery of schemes in South Bristol which do not yet have planning permission raise any uncertainties about delivery in the short term from sites with planning permission?

18. Does the report make realistic assumptions about public funding (see Investment Plan below)?

19. On the basis of the report's assessment, what would be the consequences for delivery in South Bristol if major investment was not forthcoming for essential infrastructure such as the South Bristol Link and the North Fringe to Hengrove Package?

20. The West of England Partnership's *Single Conversation: Delivery and Infrastructure Plan* (April 2010) CDE93 indicates (p19) various substantial sums between 2012-2015 for facilitating delivery in South Bristol and elsewhere. Are these figures all bids for funding from HCA?

21. What "site preparation & planning" is required for Hengrove Park/Hartcliff Campus? Is this necessary to make these sites attractive to the private sector?

22. At Knowle West what work is essential before any sites can be made available to the private sector?

23. In the light of the forthcoming national spending review, what are the prospects of the bids being successful? What are the implications for delivery in South Bristol if available funds are much reduced? Are there possible alternative ways of achieving some delivery?

24. Does the Core Strategy (particularly policy BCS1/BCS5) sufficiently address the challenges/uncertainties concerning delivery in South Bristol and is this aspect of the strategy sufficiently flexible to accommodate changing circumstances?

25. (Discussion of the relationship of possible urban extensions to development in South Bristol is best left to the postponed hearing sessions on the RSS/urban extensions/Green Belt.)

Delivery in the City Centre and rest of the City

26. (The implications of flood risk for delivery will already have been discussed.)

27. Is the housing/delivery trajectory in the Core Strategy for the City Centre consistent with the timescale/trajectory for the St Phillips/rest of city centre in

section 11 (the traffic light chart) of Roger Tym and Partners' report *Responding to Infrastructure Delivery and Planning Issues in the West of England* May 2010 (CDE79 & 80)? If not, how this explained and what are the consequences?

28. The West of England Partnerships *Single Conversation Delivery and Infrastructure Plan* (April 2010) CDE93 shows a total bid for £9.1m between 2010/11-2014/15 for "site planning/preparation and site specific infrastructure for Temple Meads and St Phillips, Stokes Croft and Dove Lane. What is this money for and what are the implications for housing delivery if the funds are not forthcoming or much reduced delayed?

End of session

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14 June 2010