

BRISTOL CORE STRATEGY EXAMINATION INSPECTOR'S HEARING AGENDAS

Agendas for the Issue 4 - Affordable housing; housing mix; accommodation for gypsies, travellers and Travelling Showpeople.

Monday 28 June - 13.30

Room 15, The Council House, College Green, Bristol BS1 5TR

Affordable Housing

1. The explanation in the first part of the Council's statement (BCC Issue 4) of anticipated overall affordable housing provision is helpful. Should the Core Strategy explain the different anticipated sources of affordable housing? Given the mix of potential sources of supply, should the monitoring indicators be more refined so as to monitor the outcome/effectiveness of the requirements of policy BCC17 as well as overall provision?

2. The first 2 pages of the Council's statement refer to a contribution to affordable housing from sites of 10 -14 dwellings (but no lower). This is not my understanding of policy BCS17. Please clarify.

Viability and proportions of affordable housing sought

3. I intend to focus this part of the discussion on how the Viability Study (CDE12) has been used by the Council to justify the policy. Any preliminary comments? Table 2 in the Council's statement is a helpful summary of the overall assessment of the Viability Study. Do the % of schemes considered viable shown in this table include those schemes assessed as "marginal" in the Viability Study?

4. On what basis were the 6 areas/zones of the City used in policy BCS17 and the Viability Study selected? Is there evidence to indicate that development values/viability considerations for different sites are more closely aligned *within* each of the 6 areas than *between* different parts of adjoining identified areas?

5. Core Strategy 4.17.7 states that the Council will expect affordable housing to be delivered without public subsidy. Accordingly, should the focus of viability assessment be the % of development scenarios where policy is viable with no grant in each of the 2 market conditions?

6. What % of viable development scenarios in a particular zone is a reasonable guide to selecting a policy proportion for affordable housing that is likely to be deliverable and effective over the life of the Core Strategy? Does the policy percentage need adjusting in some zones to ensure a greater consistency of approach across the City?

7. My preliminary view is that with "no grant", the viability position of 40% affordable housing in the North West Zone looks very weak. Is the 53% figure for Bristol East for 2009 "no grant" correct, since it shows a slightly more favourable circumstance that viability at the market peak (2007). This zone also looks weak at 30% affordable housing.

8. Does the assessment of affordable housing contributions and overall scheme viability for South Bristol and the City Centre set out in the report by Roger Tym and Partners *Responding to Infrastructure Delivery and Planning Issues in the*

West of England May 2010 (CDE79 & 80) confirm or undermine the justification for the % proportions in policy BCS17?

9. Did the Viability Study fully take into account the impact of Core Strategy policy BCS15 in accelerating the achievement of levels in the Code for Sustainable Homes?

10. In areas with an existing high proportion of social housing, would the proportions and mix of new affordable housing sought be consistent with achieving *mixed, balanced and inclusive communities*?

The approach to schemes of less than 15 units

11. The policy provides no guidance on the approach to seeking financial contributions for affordable housing on schemes below 15. My preliminary view is that the wording is too open ended. What equivalent % might be sought? Would this vary between the zones as for schemes of 15 or more? Is the intention to preclude any on-site provision if it were proposed? I am concerned at the appropriateness and cost effectiveness of soliciting contributions from schemes of only 1 additional dwelling. Discussion.

12. The statement (BBC Iss 4 last page) indicates an intention to bring forward a more detailed management policy on the subject of financial contributions. If so, should this be flagged so that the Core Strategy establishes only the principle and there is another opportunity for independent examination of the how the policy would bite? Has such a policy been included in the just published Site Allocations and Development Management DPD?

Other policy wording

13. I previously indicated that in the light of the variety of circumstances and changing market conditions in which the policy will be applied, the importance of maintaining the viability of developments should be made clear and not regarded solely as an *exceptional circumstance*. I also said that the policy should make clear that the proportion of affordable housing to be secured will be the subject of negotiation and that the policy should allow for the recycling of the subsidy if units cease to be affordable homes. The Council's statement accepts these points. (NB The deletion from the policy of "in exceptional circumstances" has occurred, but is not illustrated in Appendix 3 of the Council's statement). Any discussion of the proposed changes?

End of session

Housing Mix (BCS18)

1. Is it realistic to apply the aims of policy BCS18 to all housing developments as stated (eg sites of only a few dwellings). Should a minimum threshold be set?

2. Does the policy provide adequate guidance for further details to be explained in SPD? Matters to inform the tenure, type and size mix are listed in the policy but there is no indication of how they will be applied to applications or used to inform the SPD. How will prospective developers know how to design schemes prior to the Council commenting on an application?

3. Is therefore sufficient clarity in the policy and text about what space standards will be applied? Is the application of HCA standards to market housing justified (especially as the standards are still the subject of consultation by the HCA)? Is the application of all Lifetime Homes standards relevant and reasonable for all

types of new dwelling (eg above ground accommodation which is not accessible to wheel chair users)?

End of session

Gypsies and Travellers and Travelling Showpeople

1. Some of my previous questions referred to the requirements in the emerging RSS. If the emerging RSS were to be withdrawn would this change what the Council propose to achieve by policy BCS19?

2. Circulars 1/2006 and 04/2007 envisage a Core Strategy containing a criteria based policy to guide both subsequent allocations and the assessment of windfall applications (eg for private single pitch/plot sites). Policy BCS19 sets out criteria which will be used in *the determination of the location of sites* and I assume this includes determining windfall applications. I remain concerned that, depending on how the first 2 criteria are interpreted, the policy could be used to restrict the locations of sites to the urban area, or parts of the urban area, where land values may in practice preclude the acquisition of suitable sites by gypsy families. Whilst these criteria are a useful cascade of considerations if there is a choice to be made in selecting sites for allocation, they may not all be reasonable when applied to windfall applications. Discussion.

3. I accept that if the emerging RSS were to be withdrawn then no reliance could be placed on its suggested 3% growth assumption beyond 2011. I remain concerned however at the short term focus of policy BCS19. I recognise that needs beyond 2011 have not yet been assessed, but it seems unfair if site provision for Gypsies and Travellers and Travelling Showpeople is always addressing a backlog when provision for conventional housing is being planned to 2026. The Core Strategy is likely to endure for some years and should provide sufficient flexibility to accommodate realistic delivery of future needs. Discussion.

4. I remain concerned whether the selection criteria and the exclusion of sites in the Green Belt reflect likely realities of site provision over the life of the Core Strategy. Council to explain the most up to date position in relation to site funding/deliverability in the light of the stalling of the site grant application and in anticipation of future public funding constraints.

5. I note the Council's agreement to include a criterion referring to the acceptability of living conditions for future site occupiers.

End of session

Simon Emerson
INSPECTOR
17 June 2010