

BCC Response Statement

Re Inspector's Further Questions on Overall Housing Provision and the Green Belt

The Inspector's questions dated 22 July 2010 are shown *in italics* below. The Council's response is shown below in standard type face.

Regional Spatial Strategy

5. The existing Regional Spatial Strategies have been revoked and the Government intends to proceed with legislation to abolish regional spatial strategies. I have not seen any formal announcement regarding the withdrawal or abandonment of the emerging RSS for the South West, but given the Government's stated policy and actions, is it reasonable to conclude that the emerging RSS will not be progressed and should no longer be afforded any status?

- 1) As the Government has revoked all existing RSS and intends to abolish the legal basis for them, the Council considers that it is safe to conclude that the emerging RSS for the South West will not be progressed and should not be afforded any status.

Overall Housing Provision

6. In the absence of direction provided by the RSS process, what is the appropriate level of housing that the Core Strategy should facilitate? (Explored further in the questions below.)

- 2) In July 2010 the Government announced the revocation and abolition of Regional Spatial Strategies which had been previously used to set housing levels in local authority areas. Local planning authorities are now responsible for establishing the right level of local housing provision in their areas, and identifying a long term supply of housing land.
- 3) Proposed changes to Policy BCS5 (see Schedule of Potential Significant Changes and Appendix 1 of this statement) aims for a target minimum of 26,400 new homes to be delivered in Bristol from 2006 to 2026 with an overall aspiration for 30,000 homes. The spatial distribution is not proposed to be changed. The council's aspiration is to deliver higher levels of housing of up to 30,000 where this can be achieved without inappropriate forms of development within the Green Belt or within areas subject to flood risk zones without appropriate mitigation. The approach to deriving the target is set out below.
- 4) The Council's suggested position has responded to abolition of RSS and the government's approach to localism but remains consistent with

the Core Strategy as submitted. The overall aspiration for housing remains at 30,000 homes, with clear intentions to secure major change in South Bristol and to make efficient use of land across the city. The delivery target of 26,400 makes reasonable allowance for any delays or constraints to delivery, whilst ensuring that the overall spatial strategy is not disrupted by the use of any contingencies which would be at variance from its overall aims. Flexibility or headroom is built in to the approach via the possible contribution from small sites.

- 5) Overall the approach strives positively to deliver high levels of housing development up to 2026, whilst having reasonable regard to constraints on delivery and maintaining the Green Belt.

7. The Council should explain what account it has taken of the matters set out in PPS3 paragraph 33 in determining the appropriate level of housing in the Core Strategy (whether or not this is the same as in the submitted Core Strategy or a different figure). Other parties should address, if they wish, their assessment of what this evidence indicates as the appropriate level of housing provision. These assessments should address the following questions, among other matters.

- 6) The guidance following the revocation of Regional Strategies emphasises that local planning authorities are responsible for establishing the right level of housing provision in their area. It also states that it is for local authorities to justify their housing supply policies in line with PPS3.
- 7) The Core Strategy is in line with the considerations set out in PPS3. The potential supply of housing land in Bristol has been demonstrated through three main sources of evidence: the Residential Development Survey; an assessment of the five-year deliverable housing supply; and the Strategic Housing Land Availability Assessment. Evidence of housing needs, demand and affordability has been demonstrated through the Strategic Housing Market Assessment. This evidence has been considered in developing the housing policies of the Core Strategy.
- 8) The council has reviewed the developable housing supply evidence in the light of uncertainties over risks of flooding in certain areas and about future regeneration funding. The adjustments and discounts used to arrive at the target minimum of 26,400 are set out below.

Flood Risk

- 9) The proposal for a minimum of 26,400 homes reflects a discounting of the SHLAA assumptions to take account of flood risk under the climate change scenario. These adjustments would discount the illustrative capacity by 1,199 dwellings. Further information is set out in the Flood

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Risk Sequential Test paper. Detailed information on the sites referred to is set out in the table below:

Site Reference	Site Name	2009 SHLAA Illustrative Capacity	Illustrative Capacity discounted for flood risk under climate change scenario	Difference from 2009 SHLAA
SH0033	St Philips	500	0	-500
SH0035	Central Fire Station	178	0	-178
SH0105	Crow Lane Open Space	160	30	-130
SH0036	Redcliffe Way, Redcliffe	130	30	-100
SH0086	Central Trading Estate, Bath Road, Arnos Vale	321	240	-81
SH0029	Land bounded by Nelson St, Union St & Silver St	50	0	-50
SH0102	Henacre Open Space	80	30	-50
SH0114	Muller Rd Bus Depot, Garage and Land to Rear	20	0	-20
SH0013	Avon Way - Land At / SITA Depot / Eldred Close/Druid Stoke Avenue - Land At Rear Sea Mills Lane	50	35	-15
SH0062	Former Engineers Depot, Clamage Road, Bower Ashton	144	130	-14
SH0038	Peugeot Dealership, Clarence Rd	60	50	-10
SH0032	Land adj. 129 Hotwell Rd	10	0	-10
SH0027	Bristol General Hospital	150	140	-10
SH0044	Staff Car Park, Old Bread Street / Russ Street, Old Market	30	20	-10
SH0090	Former Texico PFS, Bath Rd	50	40	-10
SH0127	Stillingfleet Rd open space	25	15	-10
SH0109	Arnall Drive Open Space	25	24	-1
	Sub-total: FLOOD	1,983	784	-1,199

Regeneration

10) Discounting of the SHLAA assumptions has also been made to take account of uncertainties about future regeneration funding. The Core Strategy continues to aim to secure regeneration in South Bristol with a considerable component of new homes. However, in order to arrive at a housing target which offers reasonable certainty of delivery, the potential contributions from all sites within the Knowle West

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Regeneration Framework area and Pre-cast Reinforced Concrete (PRC) sites have not been relied on to contribute to the target. These discounts amount to 2,245 dwellings and 341 dwellings respectively.

11) Detailed information on the sites referred to is set out in the table below:

Site Reference	Site Name	2009 SHLAA Illustrative Capacity	Difference from 2009 SHLAA
SH0068	Inns Court	900	-900
SH0069	Kingswear & Torpoint	363	-363
SH0070	Filwood Open Land	238	-238
SH0072	The Park	150	-150
SH0073	Hangar Lane	146	-146
SH0074	Knowle West Health Park	140	-140
SH0075	Filwood Broadway	97	-97
SH0076	Novers Lane Junior School	72	-72
SH0077	Filwood Broadway	45	-45
SH0078	Hall, Garage and land at Filwood Broadway Filwood	39	-39
SH0079	Cloverdown, Filwood	37	-37
SH0082	Nash Fisher Site Novers Lane Novers Park	18	-18
SH0001	Sea Mills PRC	150	-150
SH0002	Lawrence Weston PRC	99	-99
SH0018	Lockleaze PRC	68	-68
SH0009	Henbury PRC	24	-24
	Sub-total: KWRF	2,245	-2,245
	Sub-total: PRC	341	-341

12) The dwelling number resulting from the discounting above would be 26,441 dwellings, compared to the capacity of 30,226 as set out in the 2009 SHLAA, a reduction of 3,785 dwellings. Rounded for the purposes of setting a core strategy target this results in the target of 26,400 homes.

8. Should housing provision aim to meet the most recent projections of population/household growth for the City over the plan period? Would it be realistic to do so bearing in mind the proportion of households for whom market housing would be unaffordable?

13) Recent trend-based projections extrapolate forward an exceptional period of estimated population growth which saw the unique event of

international in-migration from EU Accession countries (from 2004), a peak in house building in the city, a high point in the economic growth cycle and increasing number of students studying here. These factors generating population growth are not likely to be continued, repeated or sustained until 2026 as trend-based projections suggest. The high levels of population and households projected should therefore be treated with caution.

9. To what extent does the need for a substantial scale of affordable housing (as set out in the Strategic Housing Market Assessment - CDE10) support maximising the overall scale of housing provision?

14) The approach to housing set out in the Core Strategy seeks to secure high levels of housing provision in the city. Higher levels of provision are not considered developable within the plan period without significant harm to other policy objectives.

10. To what extent do any delivery or environment constraints support housing provision below that which evidence of need might suggest?

15) Uncertainties over risks of flooding in certain areas and about future regeneration funding, together with the Government's stated commitment to the protection of the Green Belt support the target level of 26,400 homes and the aspiration for 30,000.

11. Given the Government's clear "localism" agenda (reflected, in part, by the revocation of RSSs), should any additional weight be given to the Council's preferred level of housing, even if some evidence were to suggest that provision should be greater?

16) Considerable weight should be given to the Council's preferred target (and aspiration) for housing. The DCLG letter and guidance of 6 July 2010 is clear that local planning authorities will be responsible for establishing the right level of local housing provision within their area.

Policy BCS5

12. In the light of the above, is policy BCS5 sound? If not, what changes are needed to make it sound?

17) Changes are required to take account of the government's new approach and to clarify an appropriate, locally determined approach to housing delivery. The Council has proposed changes as set out in the Schedule of Potential Significant Changes and the reasoning is set out above. The approach is considered to be sound having regard to the evidence of need, capacity and deliverability and is consistent with Government policy.

13. *Given that there is now no uncertainty about what the RSS might have required, to what extent are the proposed contingences necessary (although flexibility remains an important consideration for soundness)? I consider that the detail relating to the contingencies from small sites and industrial and warehousing land have been fully discussed and no further statements are requested and no further discussion is anticipated on these topics.*

18) It is proposed to remove the contingencies from the Core Strategy. However, the likely contribution of homes from small sites over the plan period provides some flexibility in the reaching the proposed target. Although the target and aspiration figures for housing do not include an allowance for homes being delivered from small sites, the Council estimates that up to 4,200 could arise from this source. The combination of existing stock of permissions, overall allocated supply and the potential combination from small sites means that the target of 26,400 should be deliverable with reasonable certainty. Therefore, no further contingencies in the event of undersupply are required in this strategy.

14. *Much of the supporting text to BCS5 makes reference to the emerging RSS. It is now out of date and will not assist in explaining the justification for or application of the policy. Council to include new suggested supporting text in its statement for discussion at the hearing.*

19) Proposed changes to the Core Strategy to reflect the revocation of Regional Strategies are set out in the Schedules of Potential Significant and Minor Changes.

The Green Belt

15. *Does the appropriate scale of housing required over the plan period require provision within the Green Belt? In the absence of any steer in a higher level (emerging) policy, are there any exceptional circumstances (PPG2 paragraph 2.6) to justify altering Green Belt boundaries in relation to housing provision?*

20) The aspiration of 30,000 does not require development in the Green Belt. The target of 26,400 is deliverable with reasonable certainty and will not require the use of Green Belt land. There are no exceptional circumstances which would warrant altering the extent of the Green Belt in the city.

16. *Given the Government's clear "localism" agenda should any additional weight be given to the Council's preference in relation to the Green Belt, compared with other evidence relating to housing need and delivery?*

21). The letter from the DCLG of 6 July at Question 22 asks whether the end of Regional Strategies means changes to Green Belt. The answer is 'No. *The Government is committed to the protection of the Green Belt and the revocation of Regional Strategies will prevent top-down*

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pressure to reduce Green Belt protection. It is clear from this that very considerable weight should be given to the Council's preference.

17. *Have adjoining Council's signalled any changes (or re-commitment to previous intentions) in relation to development of urban extensions in the Green Belt adjoining Bristol City's boundary? What is the current position on cross-border working in relation to the urban extensions previously proposed in the emerging RSS?*

22) Taking each adjoining authority in turn the position is as follows:

A) North Somerset Council resolved in July 2010 to adopt the following key principles for guiding future developments following the revocation of the draft RSS:

- a. The Green Belt will be protected
- b. There will be no development at South West Bristol [i.e. the Council will not support proposals for a South West Bristol Urban Extension].

There is no current cross-border working in relation to the South West Bristol urban extension previously proposed in the RSS.

B) Bath and North East Somerset Council published a Core Strategy options document in October 2009 that included proposals for an urban extension adjoining South East Bristol in the Whitchurch area. Following the revocation of the RSS the Council is reviewing its position and is updating and re-assessing the evidence concerning housing need. The Council will consider its draft Core Strategy and its spatial strategy in November 2010.

There is no current cross-border working in relation to the South East Bristol urban extension previously proposed in the RSS.

C) South Gloucestershire Council position on urban extensions is set out in their Core Strategy Pre-Submission Publication Draft. This indicates an urban extension to the west of the M32 as previously proposed in the RSS (this does not involve development of any land within Bristol). Cross-border officer meetings are currently being set up between the two authorities.

18. *Are any changes required to the text on the Green Belt or to policy BCS6 to reflect current circumstances and consistency with policy BCS5?*

23) Various changes have been set out in the Schedule of Potential Significant Changes to address the effects of RSS abolition. References to the potential of urban extensions are no longer appropriate given the known and emerging positions of the neighbouring authorities and the absence of any regional plan proposing use of the Green Belt for urban extensions. The Core Strategy's policy on Green Belt should clearly set out Bristol's approach without making what would now be speculative and

unnecessary references to urban extensions in the Green Belt beyond the city.

19. In my Final Main Issues for Examination, Comments and Questions (13 May 2010), I set out a number of detailed questions about the urban extensions and the Green Belt to the south west and to the south east of the city. Some of these questions are no longer relevant as they sought to understand the reasoning in the emerging RSS. I will consider what remaining detailed matters need to be explored at the hearings in the light of the further statements on the overall level of housing provision and the principle of any development in the Green Belt.

Flood Risk and the Sequential Test

20. Arising from the discussion of flood risk at the hearing on 23 June, I asked the Council to explain in an updated position paper how it has applied the sequential test to housing, taking into account flood zones with climate change and reflecting any revisions to the Council's planned strategy for housing. The Council will also need to put forward possible changes to the text of the Core Strategy to refer to the application of the sequential approach and to explain how mitigating flood risk may affect delivery of housing in the city centre. I anticipate that a short hearing session will be required to discuss whether the Council's updated position paper adequately reflects national advice in PPS25 and whether the proposed changes would make the Core Strategy sound in this respect.

24)A revised paper on flood risk and the sequential approach has been prepared. Revisions to policy BCS16 and its explanatory text have been made to address the revised position. These are set out in the Schedule of Minor Changes.

Policy BCS5 – As proposed

The text below shows how Policy BCS5 and its explanatory text would appear if the changes proposed by the Council are incorporated.

Housing Provision

4.5.1 This policy sets out the level of new homes planned to be delivered in Bristol between 2006 and 2026. The policy sets out a flexible approach to housing delivery.

4.5.2 Delivery will be primarily from development of homes on previously developed sites but will include the use of some open space for housing development. The policy contributes to addressing objectives 1, 2 and 4 of the Core Strategy and responds to issues 1, 5 and 11.

Context

Housing Supply

4.5.3 The potential supply of housing land in Bristol has been demonstrated through three main sources of evidence:

- The Residential Development Survey;
- An assessment of the five-year deliverable housing supply;
- The Strategic Housing Land Availability Assessment.

4.5.4 In July 2010 the Government announced the revocation and abolition of Regional Spatial Strategies which had been previously used to set housing levels in local authority areas. Local planning authorities are now responsible for establishing the right level of local housing provision in their areas, and identifying a long term supply of housing land.

Policy BCS5

The Core Strategy aims for a minimum of 26,400 new homes to be delivered in Bristol from 2006 to 2026. In order to deliver this and as part of an aspiration to secure more homes, a flexible and responsive supply of land will be identified to allow for the delivery of up to 30,000 new homes. This will be in accordance with the spatial strategy for Bristol set out in this Core Strategy.

Development of new homes will primarily be on previously developed sites across the city. Some new homes will be developed on open space which does not need to be retained as part of the city's green infrastructure provision.

In order to maintain the net housing stock existing homes will be retained unless they are unsuitable for residential uses, would be used for essential local community facilities or would be replaced.

The broad spatial distribution of new homes as indicated on the Key Diagram will be:

Area	Aspiration for net additional	<i>Completions by 1 April 2009</i>	<i>Planning permissions at 1</i>
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	dwellings 2006-26		April 2009
South Bristol	10,000	1,883	3,141
City Centre	9,000	1,532	4,818
Inner East	2,000	697	1,033
Northern Arc	3,000	934	1,186
Rest of Bristol	6,000	1,991	2,332
Total Aspiration	Up to 30,000	7,037	12,510
Delivery target	26,400		

Flexibility

4.5.10 The Core Strategy aims to secure a supply of land for development of new homes which exceeds that necessary to secure the minimum figure of 26,400. The likely contribution of homes from small sites over the plan period also provides some flexibility in the reaching the target. Although the minimum and aspiration figures for housing do not include an allowance for homes being delivered from small sites, the Council estimates that up to 4,200 could arise from this source. The combination of existing stock of permissions, overall allocated supply and the potential combination from small sites means that the minimum of 26,400 should be deliverable with reasonable certainty. Therefore, no further contingencies in the event of undersupply are required in this strategy.

Housing figures

4.5.17 All housing figures in this policy refer to **net additional completions**, that is the total number of completions minus those lost through demolition and conversions.

4.5.18 The figure of 26,400 will be the figure used in calculations of five year supply of land for housing.

Policy Delivery

Delivery of homes will primarily be by the private sector with a proportion developed by Registered Social Landlords. The council will also facilitate delivery of homes working with its partner organisations, particularly in areas of change and regeneration, and where appropriate will support other mechanisms including self-building and community land trusts.

Further information on delivering the housing provision is set out in the delivery sections of other Core Strategy policies.

A trajectory showing the projected pattern of delivery of new homes up to 2026 is included as Diagram 4.5.1. The estimates of delivery have had regard to the impact of the major infrastructure required to support housing development.

Delivery of the homes will be in part from land with existing planning permission. At the time of publication of the Core Strategy 7,037 have already been completed to contribute to delivery from 2006 to 2026 and there were 12,510 homes contained within planning permissions. Additional developable sites for housing (including mixed-

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use developments) will be allocated in both the proposed Site Allocations & Development Management DPD and Bristol Central Area Action Plan.

The Strategic Housing Land Availability Assessment will set out the deliverable and developable supply of housing land to ensure a continuous supply of deliverable sites. The policy will be monitored and reviewed through annual Residential Development Surveys, Annual Monitoring Reports, regularly updated Strategic Housing Land Availability Assessments and deliverable housing supply surveys.

The approach to policy review is set out in the Monitoring and Review section of this strategy.

The approach to affordable housing and housing type is set out in BCS17 and BCS18.

Targets	Indicators
Provision of a minimum of 26,400 net additional homes between 2006 and 2026.	<p>Net additional homes provided (National Indicator 154)</p> <p>The target will be monitored through annual Residential Development Surveys and reported in Annual Monitoring Reports.</p>
Maintain a 5 year supply of deliverable housing sites throughout plan period.	<p>Supply of ready to develop housing sites (National Indicator 159)</p> <p>The target will be monitored through annual deliverable housing supply surveys and reported in Annual Monitoring Reports.</p>
	The Targets and Indicators section of BCS8 addresses the economic aspects of this policy
	The Targets and Indicators section of BCS10 addresses the transport aspects of this policy