



The Planning
Inspectorate

Report to Bristol City Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE BRISTOL CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 15 March 2010.

Examination hearings held between 21 June and 1 July 2010 and on 7 September 2010.

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ABBREVIATIONS USED IN THIS REPORT

AA	Appropriate Assessment
B&NES	Bath and North East Somerset Council
CAAP	Central Area Action Plan
CDE	Core Document and Evidence
CS	Core Strategy
DPD	Development Plan Document
dph	Dwellings per hectare
EA	Environment Agency
EIP	Examination in Public
ELS	Employment Land Study
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
MPS	Mineral Planning Statement
NE	Natural England
ONS	Office for National Statistics
PIWA	Principal Industrial and Warehousing Area
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SADM OD	Site Allocations and Development Management Options Document
SADM DPD	Site Allocations and Development Management Development Plan Document
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SFRA	Strategic Flood Risk Assessment
SPA	Special Protection Area

Non-Technical Summary

This report concludes that the Bristol City Core Strategy Development Plan Document provides an appropriate basis for the planning of the City over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- Changes to expected housing delivery in different parts of the City to better reflect constraints.
- Establishment of a minimum figure for housing supply which is lower than that in the submitted document and a higher figure for potential housing developments which would be in accordance with the strategy.
- Amendment to the policy on affordable housing so that it is applied more flexibly, consistent with the evidence on viability.
- The deletion of a policy requirement to accelerate the national timetable for sustainable construction standards, as a result of a lack of evidence that such acceleration is universally warranted and deliverable in the City.
- A number of detailed changes to the wording of policies and supporting text to more clearly express the Council's intentions and to remove apparent conflict with national policy.

Most of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the Examination. The changes do not alter the thrust of the Council's overall strategy. However, among the changes proposed by the Council was the deletion of all references to a contingency for future development in the Green Belt and of cross-boundary working with adjoining authorities if any urban extensions were to emerge in the plans of those authorities. Given the uncertainty about future housing need and demand and economic growth, the deletion of these aspects of the submitted Core Strategy is not justified and would make the strategy less flexible to respond to changing circumstances. These relevant elements of the submitted Core Strategy have thus been retained, subject to some detailed updating for consistency with other changes.

Introduction

- i. This report contains my assessment of the Bristol Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
- ii. The starting point for the Examination is the assumption that the local authority has submitted what it considers to be a sound plan. The submitted draft core strategy (March 2010) is the same as the document published for consultation in November 2009 (reference number of document from the Examination Library - CDE29). However, with the submitted document, the Council also submitted a schedule of what it considered to be minor changes (CDE37). With the exception of one change (C4.10.10) which was not minor, I indicated at the Pre-Hearing Meeting that these minor changes would be embedded in the submission document and I do not refer to them further.
- iii. My report deals with the changes that are needed to make the DPD sound and they are identified in bold in the report (as either **S** or **IC** with a paragraph number from the schedules). Most of the changes have been proposed by the Council and are presented in **Appendix A**. The additional changes that are necessary are recommended are in **Appendix C**. A few of the changes proposed by the Council are not justified. These concern the deletion of the existing references in the submitted Core Strategy to a long term contingency for development in the Green Belt and of cross-boundary working with regard to any potential urban extensions. The changes which could make the plan unsound have been deleted from the schedule of Council changes in Appendix A. In Appendix C, some small changes are recommended to clarify and update the retained text on these matters.
- iv. Some of the changes put forward by the Council are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report, although I endorse the Council's view that they improve the plan. These are shown in Appendix B. I am content for the Council to make any additional minor changes to page, figure, and paragraph numbering and to correct any spelling errors prior to adoption.
- v. The Council's proposed changes that go to soundness (all of Appendix A) and the changes relating to policy BCS15 in Appendix C have been the subject of public consultation and I have taken the consultation responses into account in writing this report. The Council also published an update to the Sustainability Appraisal (SA)

as part of the consultation.

- vi. To comply with the legislation it is necessary for all the changes in the Appendices to be subject to a recommendation in this report. This is set out in my Overall Conclusion and Recommendation.

Assessment of Soundness

Main Issues

1. Taking account of all the representations, written evidence and the discussions that took place at the Examination hearings, I have identified 10 main issues upon which the soundness of the plan depends.

Issue 1 – Is there an appropriate vision based on the characteristics of the area and the issues and challenges facing it? Do the objectives respond to the vision and key issues?

2. PPS12 explains (¶s 4.1-4.2) the relationship between issues, the vision, objectives and the strategy/policies. These matters are as important in the plan-making process as their final expression in the CS. Section 2 of the plan sets out the *Issues and Challenges* and section 3 the *Spatial Vision and Objectives*. Whilst the description of issues could have been more detailed, no fundamental issues which the plan should address have been omitted. Section 2 is sound. The report *Building a Positive Future for Bristol After Peak Oil* (CDE58) explores the possible consequences for the City when world-wide oil production starts to decline and suggests possible mitigation measures. *Peak Oil* is mentioned once in the Vision, but is not identified as a key issue. It is a long term issue that will need to be addressed nationally, but as it is not identified as an essential development plan matter in national policy there is no requirement for the Bristol CS to do so now.

3. The vision is set out as an overall descriptive statement and as a series of bullet points relating to different parts of the city and different spatial considerations. With a few detailed exceptions, the descriptive text is compatible with the bullet points and both are compatible with what is set out in the rest of the plan. However, in the spatial vision for *A transformed South Bristol*, the bullet referring to *a vibrant new heart for South Bristol* overstates the scale of the District Centre now envisaged (see ¶ 104 below). Council proposed change **S3.1** deletes this phrase. Under *A City of sustainable travel* rail is a significant omission from the intended features of a city of sustainable travel. Council change **S3.3** remedies this omission. In the section on *Housing to meet local needs* the Council proposes to introduce a qualification to indicate that not all needs can be met eg *help meet the needs of a growing and changing population*. This change (**S3.4**) is necessary because, as explained under issue 2, the housing provision now proposed by the Council is unlikely to meet the housing needs and demands of the growing population of the city.

4. The spatial vision includes reference to Green Belt areas on the city fringes being maintained to safeguard Bristol's attractive setting. As the submitted CS has a contingency for an urban extension in the Green Belt,

there is a tension with this vision statement. The Council's proposed changes which would have deleted all references to this contingency and to the possibility of development in the Green Belt would make the plan unsound, but it remains the Council's vision that the Green Belt is not built on. An imposed change to put a caveat in this part of the vision would not serve any purpose nor is it necessary for soundness, despite the tension that remains.

5. The vision for Avonmouth is a reasonable reflection of the economic importance and opportunities in that area, as well as the environmental constraints. The potential at Avonmouth for renewable energy developments could have been highlighted in the vision for *Tackling Climate Change*, but not doing so does not make this part of the plan unsound.

6. The CS lists 11 objectives. These are expressed in broad terms that might be applicable to many cities and do not provide any specific spatial dimension, but the aim of the objectives is consistent with the identified issues and with the vision and are sound.

Issue 2 – Is there an adequate spatial strategy for the delivery of housing having regard to local needs and constraints and the requirements of PPS3?

Overall Housing Provision

7. In the submitted CS, policy BSC5 proposes the delivery of a minimum of 30,000 new homes between 2006 and 2026. The policy distributes this to the 5 spatial areas defined in the CS, consistent with the figures in policies BCS1-3. Policy BCS5 also proposes contingencies if monitoring shows that planned provision will not be delivered at the levels expected or if land is required to accommodate higher levels of provision. The contingences identified are: contribution from small sites/subdivision; mixed use of some industrial and warehousing land; and use of some of the Green Belt in south east Bristol for an urban extension.

8. The 30,000 figure is consistent with the recommendation of the Panel that held the EIP of the emerging South West RSS, but falls well short of the Secretary of State's proposed changes (July 2008) to the RSS which indicated required provision of 36,500, including urban extensions in the Green Belt to the south east and south west. The Council has always opposed the scale of housing proposed by the Secretary of State and was opposed to development in the Green Belt unless it was forced by the final outcome of the RSS to facilitate development there.

9. The Council now proposes that policy BCS5 should be amended to set a minimum target of 26,400 dwellings, but envisages that 30,600 homes could be expected to be provided. The Council also proposes the removal of the contingences, including all references to urban extensions in the Green Belt.

10. The Council's justification for this approach is set out in a Position Paper on Overall Housing Provision which has been through a number of revisions. This Paper was first prepared prior to the hearing discussion of housing provision and the Green Belt on 7 September 2010; was amended in the light of questions I raised after that hearing and subsequently in response to a further round of informal consultation with hearing participants. The final revision of this paper (December 2010) was published in support of the changes which have been the subject of formal consultation and revised SA. The Paper sets out the Council's position on the factors to be taken into account in determining the appropriate level of housing in paragraph 33 of PPS3.

11. The Council's proposed changes to policies for housing provision and the Green Belt were first put forward when it was believed that the Secretary of State had revoked all approved RSSs. Since then, the Secretary of State's action has been declared unlawful. However, the reinstated RSS (RPG10) for the South West dates from 2001. With regard to new housing it set requirements in relation to the former Counties (eg Avon) for the period 1996 - 2016. It is thus of very limited relevance in determining the appropriate housing provision to 2026 in one part of a former county area. The Council regards the emerging RSS as abandoned.

12. Prior to the Government's announcement of its intention to abolish the regional tier of the development plan (27 May 2010), proposed changes by the Secretary of State to an emerging RSS would have carried very considerable weight in this Examination. This was because such proposals had very real prospects of becoming part of the development plan in the near future and it was right to anticipate those proposals in lower order plans. However, there is no realistic prospect of the previously emerging RSS ever becoming part of the development plan. Even if the Government's intention expressed in the Localism Bill does not become law as currently envisaged, this would not immediately change matters. Progression of the emerging RSS to become part of the development plan would need further technical/administrative work and formal endorsement by the Secretary of State. This would be completely at odds with all the Government's announcements regarding the regional tier. In the context of this Examination and its focus on the long term planning of the city, the emerging RSS has little policy weight. Nonetheless, regard should still be given to the evidence and reasons why the Secretary of State considered that 36,500 dwellings should be provided in Bristol City.

13. The SHMA (CDE10) indicates a substantial level of housing need for the plan period (over 30,000 households) which is more than can realistically be met in any scenario. The need for affordable housing weighs in favour of maximising overall housing provision in so far as that would maximise the affordable housing that can be delivered. The SHMA is not particularly helpful in relation to overall housing demand since it was set in the context of the requirements of the emerging RSS. It drew on population projections from 2004. It considered that 2.8% was a more realistic figure for job growth in the sub-region over the plan period than

the 3.2% on which the Regional Economic Strategy and the emerging RSS were based.

14. The National Housing and Planning Advice Unit referred to in paragraph 33 of PPS3 has been abolished. Its most recent potentially relevant advice is from mid 2009. This points to a general and regional need for substantial additional housing provision, particularly to tackle issues of overall demand and affordability. However, this has limited weight because: it does not have a particular focus on Bristol; it was prepared in the context of further regional planning which has now been abandoned; it is somewhat dated; and the abolition of the unit must reflect the Government's priorities about the relevance of its work.

15. The EIP Panel's recommendations were informed by the 2003 based ONS Household projections (which projected household growth over the plan period of 29,000). The Secretary of State's Proposed Changes were informed by the 2004-based figures, which projected household growth in the city of 42,000. The 2006-based figures project household growth of 63,000. The most recent set of projections were published in November 2010 (2008-based) and project household growth of 72,000. The 2006 and 2008- based projections suggest household growth substantially above any evidence or proposals for delivering housing in or around the city.

16. The Council considers that the 2006 and 2008-based figures are not a useful guide to future household formation because they are based on extrapolations from the preceding 5 year periods which, in its view, saw a unique set of circumstances, which are unlikely to be repeated. These included very high levels of international migration and other circumstances specific to Bristol (as explained in the Housing Position Paper ¶s 3.21 and 3.22). But the Council's assessment is strongly questioned by a number of representors. Other evidence, such as that on international migration referred to by the House Builders' Federation suggests that international migration may not substantially decline over the period of the plan. The balance of evidence indicates that the most recent projections need to be treated with caution but, equally, they should not be completely set aside.

17. PPS3, paragraph 33 refers to having regard to the *latest household projections*, but given the uncertainty over the applicability of the most recent figures, regard should also be given to previous projections, particularly those that have informed the evaluation of the emerging RSS. The Council does not draw any conclusions from the earlier projections, but emphasises the volatile nature of the city's annual population change (Housing Paper ¶ 3.24 and Table 4). The most recent projections may overestimate in-migration, but the 2003-based projections reflected a 5 year period when there was net out-migration. Notwithstanding this outflow, the projected household growth was still 29,000 households to 2026 and thus greater than the minimum commitment of 26,400 now proposed by the Council.

18. It is impossible to draw any firm conclusion from the evidence on household projections and they are clearly only one factor to be taken into account. Nevertheless, they strongly suggest that household growth pressures may well be greater, and potentially much greater, than the Council is planning for. This likelihood, and the inevitable uncertainty about the assumptions embedded in the projections, indicates that a degree of flexibility should be incorporated in the plan and that the consequences of housing provision falling significantly below that required from demographic pressures should be acknowledged.

19. Economic growth forecasts are another important consideration in determining the appropriate scale of housing provision. Recent work for the Council (outlined in the Position Paper) indicates that the provision of 30,200 homes (the original output of the SHLAA) over the plan period could increase the labour supply by about 23,500. This is only slightly above the increase in labour demand in the central scenario for growth of 2.3% produced by Oxford Economics (June 2010) for the South West Councils. The Council relies heavily on this similarity of outcomes in concluding that the plan is making appropriate provision for housing.

20. There are several factors which weaken the weight that can reasonably be given to this projected alignment of homes and jobs. No definitive conclusion can be reached about future economic growth, but whilst the Council now considers 2.3% is a reasonable assumption, its is significantly lower than 3.4% growth which is referred to in the West of England Local Enterprise Partnership's bid to Government in September 2010 (CDE121). This Partnership includes Bristol City. This figure is the assumed growth in the whole sub-region, but Bristol City is the largest single component of the sub-regional economy.

21. A number of representors highlight the analysis in the Centre for Cities report: *Agenda for Growth* June 2010. This indicates that in the 10 year period to 2008, Bristol had the highest net additional number of private sector new jobs of any city other than London and was the 5th ranked city for the percentage of private sector job growth. The evidence of very successful past economic performance suggests that the city could be well placed for good performance in the future and that the Council could be more ambitious in its intentions for economic growth, as indeed, the LEP bid seeks to be.

22. The Oxford Economics projections embody their own assumptions about population growth and migration as factors influencing the labour market and thus economic growth. There is an element of a circular argument when comparing the output of this study with an assessment of the job demand arising from 30,200 additional homes.

23. Finally, whilst the relationship between job growth and housing growth is important and one may act as a constraint on the other, it is not essential to balance the number of additional homes and jobs created in the city. There is currently a substantial inflow of workers into the city and the provision of additional homes above the predicted rate of job growth would be likely to reduce the need for long distance commuting.

24. The Council's assessment of the appropriate level of housing provision for Bristol demonstrates little consideration for the potential implications for adjoining authorities, other than noting that those authorities do not currently support urban extensions in the Green Belt to the south east or south west of the City.

25. Overall, the Council's assessment of most of the factors in PPS3 paragraph 33 is weak. But the other major consideration in the Council's assessment of the appropriate scale of housing is land supply which is considered below.

Housing land supply
SHLAA and sites with planning permission

26. Subject to the specific reductions subsequently introduced by the Council and discussed below, the SHLAA (CDE8) is a reasonably robust indication (as of March 2009) of housing land supply within the built-up area. The SHLAA excluded sites in the Green Belt at an early stage in the exercise, which was unfortunate, but the Council has separately considered the capacity of the Green Belt and I address this later.

27. The Council explained that the assessment of the larger sites in the SHLAA had been based on site-specific considerations and the likely mixed use nature of those sites in and around the city centre. It had not made a blanket application of density assumptions. The Council's approach gives a reasonable guide to likely capacity.

28. The SHLAA assumes an overall contribution of 1,100 units on land to be identified in the Area Green Space Plans as surplus to open space requirements. The Site Allocations and Development Management Options Document (SADM OD) (CDE103) June 2010, identifies potential housing sites on open space with an illustrative capacity of 1,396. Not all of these sites are likely to be progressed, but the Options document supports the figure of 1,100 as a reasonable estimate of the contribution to land supply from this source.

29. The Council had contacted owners/developers of large sites to ascertain their intentions for sites with planning permission. The Council adopted the advice received. There were 20 non-responses amounting to 485 units. The Council regarded these sites as still developable, but after the first 5 years. This is a reasonable approach. Although there must always be an element of uncertainty about whether a particular site will be developed, especially in the continuing difficult market conditions, there is no evidence of substance to undermine the Council's assumptions. Given that the Council has sought information from owners/developers and taken it into account, it is not necessary to apply any generalised discount on delivery from this source, such as the 10% suggested by some.

30. The SADM OD provides further evidence of the credibility of the SHLAA. Of the sites identified in the SHLAA only sites with a total of 154 units have not been brought forward in the SADM OD, being considered undeliverable or too small. The SADM OD includes an estimated 1,020

units on new sites not previously identified in the SHLAA. Whilst all the housing sites in the SADM OD are put forward as options (with alternatives indicated of no development or, in some cases, non-residential development), the document indicates that the SHLAA was not optimistic in its assessment.

31. The Council's proposed change to reduce the minimum housing provision from 30,000 to 26,400 arises, in part, from its recognition of some constraints and uncertainties affecting some locations in the SHLAA. The Council and its partners have been planning for some time the redevelopment of existing public housing in parts of Knowle West. The proposals envisage achieving a significant increase in the number of dwellings as a result of redevelopment (up to 2,200). However, these proposals are dependent on substantial public funding (Position Paper Delivery in South Bristol, July 2010 CDE114). The scale and timing of any such funding is now uncertain, such that the Council considers that these proposals cannot be regarded as developable sites for the purpose of assessing land supply, despite its continued commitment to bring these proposals forward. The Council now propose to exclude from the table of supply in BCS5 this expected gain from redevelopment. Proposed changes **S4.1.2A** (in the text supporting BCS1) and included with **S4.5.8A** makes clear that provision of an additional 2,200 homes at Knowle West would still be consistent with the spatial strategy. This more cautious approach to the redevelopment project is justified.

32. In their initial representations and at the hearing in June 2010, a number of parties questioned the ability of South Bristol to deliver the scale of market-led housing assumed in the SHLAA and proposed in the Core Strategy. Delivery in the past has been below expectations and substantial development at Hengrove Park, which is a significant element of the proposals for South Bristol, has not materialised when proposed in the past. However, market delivery is not unrealistic over the plan period. Significant change is taking place at Hengrove Park which will improve perceptions of the area. The Skills Academy has been completed and the new hospital and leisure centre are under construction. These will create a range of excellent new facilities. The Hengrove to Northern Fringe Rapid Transport route and the South Bristol link road will also improve accessibility. Funding is not yet committed for these projects and delivery may be delayed from previous expectations, but the schemes are still actively being pursued by the Council and its partners and are in the development pool of projects under consideration by the Government. Several developer interests oppose the Council's proposed reduction in the headline figure for South Bristol from 10,000 to 8,000. These concerns indicate some support for overall deliverability of the scale of development contemplated. The Council's proposed reduction in the contribution from South Bristol to 8,000, plus the recognition of the possibility of an additional 2,200, is sound (part of **S4.1.1** and **S4.1.2A**).

33. The submitted Core Strategy proposed 9,000 dwellings over the plan period in the city centre. Parts of the city centre are currently at risk of flooding and the extent and seriousness of flooding is expected to increase with climate change. However, in assessing the suitability of sites in the

SHLAA the Council had not taken into account climate change and had not applied the sequential approach on that basis. This approach was not sound given the very considerable increased risk from flooding that is predicted to occur.

34. Consistent with the advice of the Environment Agency (EA) and the precautionary approach set out in PPS25, the Council has now reassessed the capacity of suitable sites in the city centre discounting sites which would be in Flood Zone 3 over the lifetime of the development. This has resulted in a reduction of capacity from 9,000 to 7,400. There are no firm proposals to address this flood risk, although a study commissioned by the Council to report in 2011 is the first step. Whilst more capacity might emerge, this cannot be relied on. The Council's proposed changes to policy BCS2 (**S4.2.1**, **S4.2.2** and **S4.2.3**) are necessary for soundness.

35. One further adjustment has been made by the Council to the SHLAA's assessment. It now discounts additional capacity arising from the redevelopment of pre-cast concrete dwellings because the scale of redevelopment (and availability of funding) is unlikely to be as great as previously envisaged (referred to in S4.5.2A). This is reasonable.

Other potential sources of supply

36. *Small sites and conversions.* The Council has assessed that small sites (less than 10 units, which is below the threshold of the SHLAA) will contribute at least 200 dwellings a year and that subdivisions will contribute 100 dwellings a year amounting to 4,200 from this source from adoption. The assumed annual rates are substantially discounted from what has been achieved in recent years. Only a modest proportion of small sites in the past have been on garden land (Council Paper: 21 July 2010, CED115) and the Council's density policy (which is sound) seeks densities well above the previous national minimum. Therefore the changes to PPS3 in June 2010 do not undermine the assumption of delivery from these sources.

37. In the submitted document, the contribution from small sites is included as one of the 3 contingencies. Since the Council can do little to influence delivery from this source over the plan period it cannot sensibly be regarded as a contingency. The Council's proposed changes include the overall contribution from this sources in the table in policy BCS5 as contributing to the envisaged 30,600 (in S4.5.6), but it is not relied on to deliver the proposed minimum target of 26,400.

38. The Council is correct not to regard small site windfalls as contributing to its minimum land supply target. PPS3, paragraph 59 makes clear that they should not be included in the first 10 years of land supply unless the Council can demonstrate "the genuine local circumstances that prevent specific sites being identified." Given that the Council accepts that there is some potential for housing development in the Green Belt (see below), but has chosen as a matter of policy not to allocate sites there, this test is not met. But this does not prevent the contribution from such sites being recognised in some form as an

additional element of supply. I conclude later whether the minimum provision and the twin track approach is sound overall.

39. *Mixed use redevelopment.* The 2nd contingency in policy BCS5 (as submitted) is mixed use redevelopment of some industrial and warehousing land. This contingency is proposed to be deleted by the Council (part of S4.5.7 and S4.5.8). During the early part of the Examination it was clarified by the Council that this was intended to refer to redevelopment of land within the designated Principal Industrial and Warehousing Areas (PIWAs). But the Council had very little evidence to demonstrate the potential for such redevelopment within these areas or the consequences of doing so. It was clear that the Council would only adopt this contingency reluctantly. The evidence from the *Employment Land Study* (ELS) 2007 (CDE15) and from participants at the hearing on Issue 3 (see below) strongly supports the need to retain the overall stock of land throughout the City for industrial and warehousing use. Mixed use residential development within PIWAs would be likely to constrain the use of adjoining land to ensure compatibility with residential use. The loss of land suitable for B2 and B8 uses would therefore be greater than simply the land directly lost to housing. Accordingly, this contingency is not a credible source of additional housing supply and deleting it from the plan is necessary for soundness.

40. *The Green Belt.* The 3rd contingency is an urban extension to the south east of Bristol for up to 1,500 dwellings. Again, this was a contingency proposed with reluctance by the Council and it was clear that it would have been brought forward only if the RSS eventually made it essential to do so. The Council proposes to delete this contingency.

41. The Council has assessed capacity of sites within its Green Belt in 2 studies. The Council's assessment in 2007 (CDE 53 p19) identified potential capacity (albeit with constraints) in the south west for 1094 dwellings from a number of small sites on this edge of the City. The more recent study in 2010 (CDE28 p22) identifies a range of between 445 and 578 dwellings (depending on density). This takes into account changes since 2007, such as the resolution to grant planning permission on a large site for other purposes. The more recent work effectively supersedes the earlier study.

42. There is no credible evidence to indicate that the Green Belt within south west Bristol City (and considered in isolation from land outside the city) has a potential capacity greater than that identified in the Council's most recent work. There is no robust evidence to indicate how the 1,500 dwellings proposed here in the emerging RSS could be achieved. Given the small size of some of the sites in this part of the Green Belt, their peripheral location and the disjointed relationship between them, capacity for high quality residential development is likely to be below the Council's range. A density of more than 50 dph would be hard to deliver or justify here and was not supported by the one developer actively promoting one of these parcels.

43. The Council's 2007 study assessed capacity in the south east Green Belt (within the city boundary) as unlikely to exceed 1,500. This figure assumed the loss or relocation of a variety of existing uses (cricket and football grounds, allotments, industrial units and the land for the potential expansion of the park and ride). The developer promoting a cross boundary urban extension (with land in Bath and North East Somerset - B&NES) had assumed the retention of these uses. No work appears to have been done as to where the open space uses might be successfully relocated. Given the tight confines of the city boundary it is difficult to envisage this being easily achieved. It cannot therefore be assumed that the land these uses occupy would be available for residential development. The Council's most recent assessment of capacity within this part of its Green Belt is for about 800 dwellings if existing uses are retained (Housing Position Paper December 2010, Appendix 6). For the purposes of this Examination, this is a reasonable estimate. Accordingly, the overall capacity of the Green Belt within the city is probably no more than about 1,200 dwellings.

44. There are no other realistically available sources of housing land supply within the city to increase housing provision other than the Green Belt. In relation to the potential scale of additional housing that might be required if the Council has been too pessimistic or cautious about household and economic growth, the contribution from the Green Belt within the city boundary is quite modest, although clearly material. But the Green Belt could also have a role in providing sizeable urban extensions on a cross-boundary basis, as was proposed by the Secretary of State in the emerging RSS. A cross-boundary approach would ensure that the size and form of any urban extension(s) was properly planned to maximise sustainability, rather than being determined by the rather irregular shape of Bristol City's administrative boundary.

45. The City Council's opposition to development in the Green Belt is consistent with that of the neighbouring authorities. Both North Somerset and B&NES were opposed to the requirement in the emerging RSS for urban extensions to Bristol in the Green Belt within their areas. The Core Strategies of these councils are not as advanced as that for the City Council, but neither of these councils envisage proposing urban extensions adjoining Bristol.

46. RPG10 2001 indicates (3.11) that the next round of structure plans should review the boundaries of the Green Belt to ensure future patterns of growth are sustainable and this is required in policy SS8 for the Bristol Area. That task now falls to Core Strategies, but does not mean that Green Belt land has to be released for development. Its capacity to accommodate development has been reasonably assessed and the Council's intended proposals do not require Green Belt land.

Overall conclusion on housing provision and supply

47. The Council's assessment of the contribution from the different components of supply is justified. The planned provision of 30,000 dwellings as set out in the submitted plan cannot be delivered in a PPS3

compliant way. This element of the submitted plan is therefore not sound and changes are required.

48. The Council's proposed change for a minimum housing provision of 26,400 is very unlikely to meet, and could fall very substantially below, the potential housing demands in Bristol over the plan period. If the Council's anticipated delivery of 30,600 dwellings is achieved this would avoid the worst consequences of the lower figure, but could still be under provision. Whilst the Council's intention of delivering 30,600 new homes might achieve a broad balance between the number of additional people living in the city and seeking work and the number of new jobs provided, it could restrict economic growth if economic circumstances are more favourable than expected and/or increase the proportion of workers commuting into the city.

49. Considerations of household projections, housing needs and greater ambition or optimism regarding economic growth point to a higher housing figure than the Council expects to deliver, but land supply is a very real constraint within the city boundary. Some parties seek the imposition of the requirement set by the Secretary of State in the emerging RSS of 36,500. Whilst such a figure would help accommodate the potential pressures from household growth, contribute significantly more affordable housing and enable a higher level of economic growth if other conditions are favourable, such a figure could not realistically be delivered and its imposition would be unsound.

50. The indicators of housing need, potential household growth and the opportunity of facilitating greater economic growth, would provide the necessary exceptional circumstances (as required by PPG2) to justify a change to the Green Belt boundary. But this does not mean that the City Council is obliged to do so if it wishes to pursue a strategy of greater restraint which is otherwise justified.

51. Even if development were to be permitted in the Green Belt, housing supply from identified sites/locations would be increased by only about 1,200, which is a modest amount in comparison with possible household pressures and affordable housing needs. Immediate release of Green Belt land does not resolve the potential problems. Furthermore, development in the Green Belt would be constrained by the city boundary and if such development is not coordinated with adjoining authorities, may not represent the most effective and efficient use of this finite resource.

52. The only way that substantial additional housing pressures could be accommodated would be via urban extensions in the Green Belt and these would largely be beyond the city's boundary, as was proposed in the emerging RSS. The opposition of the relevant adjoining councils to such development effectively precludes any current strategy that sought a more comprehensive approach to potential needs and opportunities. It would be unreasonable to expect the City Council to explore cross-boundary urban extensions at a time when the neighbouring authorities are opposed to such development and there is no higher tier of planning being actively pursued to promote such an approach. Nonetheless, as this

plan is the first Core Strategy of the West of England authorities to be examined, it would be short-sighted to rule out the possibility of a cross-boundary approach to development in the Green Belt in the future. The Localism Bill may also require adjoining authorities to co-operate on cross-boundary issues.

53. Given the inevitable uncertainties of future projections and the complexity of the inter-relationships between potential economic growth, household growth and housing supply, there is no single "right" answer to the appropriate scale of housing for the City. But it is important that the consequences of the choices made are clearly set out. Given the uncertainties it is also important to review the evidence in the future and for there to be flexibility to respond to changing circumstances

54. In the particular circumstances of Bristol at this time, the Council's approach of regarding the restricted land supply as the most decisive factor in determining the strategy is justified. The components of the Council's proposed minimum of 26,400 dwellings are PPS3 compliant. Given the Government's intention to move from the imposition of housing targets via the RSS to encourage housing via the New Homes Bonus, it is justified for the Core Strategy to identify both a minimum provision and additional sources of supply which the Council wants to accommodate. The Council's proposed changes indicate that at least 32,800 dwellings within the City would be compatible with the strategy. (The elements included in this total are shown in table 4.5.1 in proposed change S4.5.8A. The figure of 32,800 includes the possible 2,200 additional dwellings at Knowle West.)

55. PPS3's advice in relation to the consideration of windfalls is essentially predicated on the housing requirement being determined before the assessment of the land supply components necessary to meet that requirement. Given that for Bristol land supply is the prime practical determinant of overall provision, it is appropriate that some regard is given to the contribution from a robust assessment of small site windfalls. The Council's identification of a minimum figure which excludes this contribution is explicitly to avoid the housing supply requirement leading to pressure on the Green Belt. This is justified given the Council's opposition to development in the Green Belt, the comparatively modest contribution that it would make and the danger of short term sub-optimal solutions to the use of this land.

56. Council proposed changes effectively replace the housing section of the submitted Core Strategy. New paragraphs summarise some of the conclusions from the Housing Position Paper, but there is no reference to any potential adverse consequences of the chosen approach, which are touched on in the Position Paper. This gives a false impression of the Council's strategy, implying that it is able to achieve all objectives and ignores the competing pressures and hard choices that have actually been made. Accordingly to be sound, additional text is needed to acknowledge potential adverse consequences and uncertainties (**IC4.5.i**).

57. The Council proposes additional text in the Policy Delivery section to indicate that all the evidence relating to the provision of new homes will be reviewed within 5 years of adoption. This is essential and therefore sound, but there is nothing to indicate how alternative or additional provision could be made. In these circumstances, the submitted plan is sound in recognising the need for some form of long term contingency.

58. It is not sound, as the Council proposes, to delete all references in policies BCS5 and BCS6 to the use of some Green Belt land as a long term contingency, nor to delete references to joint working if urban extensions were to be proposed outside the city boundary. Accordingly, the Council's proposed change S4.5.7 (which would have deleted the list of contingences) and part of S4.5.8 (deleting paragraph 4.5.15 which refers to the urban extension in south east Bristol) have been removed from the Council's schedule of changes. Some updating of these retained paragraphs is required. They should refer to the outcome of the proposed monitoring rather than anticipating the approval of the RSS. (If that did eventually occur it could be taken into account in the proposed review). Paragraph 4.5.15 refers to capacity in south east Bristol as unlikely to exceed 1,500 homes, but in the light of the more recent evidence, 800 should be substituted (made in **IC4.5.ii**). Paragraph 4.5.16 refers to minimal feasible capacity in south west Bristol. This underestimates the position, but the individual sites here do not form a cohesive area sufficient to be identified as a strategic contingency. A reference is included in **IC4.5.ii** to there being some potential for new homes on smaller sites in the Green Belt in south west Bristol, which is consistent with the evidence.

59. Taking into account all of the above considerations, the majority of the Council's proposed changes to the section on housing provision are necessary for soundness, namely: **S4.5.1, S4.5.1A, S4.5.2, S4.5.2A, S4.5.2B, S4.5.3, S4.5.5, S4.5.6, S4.5.8** (except in relation to CS paragraph 4.5.15 which is retained, but amended), **S4.5.8A, S4.5.11, S4.5.12A, S4.5.12B, S4.5.13, S4.5.13A, S4.5.14** (the revised housing trajectory) and **S4.5.14A**. The necessary new paragraph on uncertainties and potential consequences is sent out in **IC4.5.i**; the deletion of the contingences in policy BCS5 other than an urban extension in the Green Belt is made in **IC4.5.iii** with updating; and the retention of paragraph 4.5.15 updated as described above is in **IC4.5.ii**.

60. In relation to Green Belt policy BCS6, a series of Council proposed changes would delete all references to an urban extension either beyond or within the city boundary. Given that the Core Strategies of the adjoining authorities are not yet adopted, the deletion of the paragraph in BCS6 relating to joint working in the context of any urban extension in adjoining authorities is premature and inflexible. Its deletion would be unsound and the paragraph should be retained unchanged. Some of the supporting text needs updating for consistency. Accordingly, it is necessary to remove from the schedules the Council's proposed changes M4.6.1, S4.6.2, S4.6.3 and S4.6.5 and excluded paragraph 4.6.6 from S4.6.4.) The updating of retained paragraphs 4.6.4 and 4.6.6 is recommended in **IC4.6.i** and **IC4.6.ii**. It is also necessary for

consistency to retain the notation for the south east urban extension on the South Bristol and Key Diagrams. Its intended removal has been deleted from the list of changes in S4.1.4 and S11.1 and the amended description of the scale of a possible urban extension from 1,500 dwellings to 800 dwellings is made in **IC4.1.i**.

Issue 3 – Is adequate provision made to support economic development having regard to local evidence and the overall strategy (including development at Avonmouth)?

Office floorspace

61. In relation to future needs for office floorspace and land for industrial and warehousing use, the Council relies primarily on the recommendations in the ELS 2007 (CDE15). The Council consider that this provides robust evidence for employment planning. There is no substantive evidence challenging the overall approach to office development. The scale of new office growth which the Core Strategy seeks to facilitate is consistent with the recommendations in the ELS (CDE15). Undue precision is not required and could be misleading where proposed office growth is identified in different locations. Appropriate flexibility would be achieved by prefacing the floorspace figures in BCS8 with *around*. It is also necessary for effectiveness to clarify that the figures are net additional provision on top of existing commitments. These matters are resolved by Council proposed changes **S4.1.1**, **S4.1.3**, **S4.2.2**, **S4.2.4**, **S4.8.1** and **S4.8.2**.

62. In policy BCS8 there is ambiguity as to how the 50,000 sq m of office space allocated to South Bristol relates to the 36,000 sq m of space to be distributed amongst town, district and local centres, since there are a number of such centres in South Bristol. The Council's intention is that the centres in South Bristol can have a share of the floor space allocated to all centres. The figure of 50,000 sq m of office space in policy BCS1 for South Bristol also lacks a spatial steer. Given that South Bristol covers a substantial part of the city this vagueness is unsound, undermining effectiveness and in danger of conflicting with national policy in PPS4 which seeks to accommodate office developments within town centres. The Council's proposed changes (included within **S4.1.1**, **S4.1.3**, **S4.8.1**, and **S4.8.2**) appropriately address this problem by identifying a total of 60,000 sq m for South Bristol to be focussed on centres and major regeneration areas. The floorspace for centres in the rest of Bristol is reduced.

Industrial and Warehousing land

63. The ELS recommended that outside Avonmouth, 24.5 ha of additional land should be provided for industry and warehousing. The only specific location for new land is 5-10 ha around the Nover's Hill and Vale Lane PIWAs identified in policy BCS8. The extent of new employment land here that is reasonably practical to develop and attractive to the market is likely to be at the lower end of the range indicated in policy BCS8. The ELS suggested only up to 5 ha; there are several local plan environmental

designations covering most of the land that could be allocated; and a substantial part of the largest area likely to be allocated is steeply sloping. The CS (4.8.15) envisages that the rest of the new industrial land recommended in the ELS should be found from the renewal of PIWAs. However, any such developments would not represent the new land recommended in the ELS.

64. The evidence of commercial property agents shows that there is strong demand for industrial and warehouse premises and that additional land would support the CS objective of economic growth. It is also a sector that can contribute to a broad range of jobs being available, complementing jobs in the expanding office and service sectors. The jobs provided by the industrial/warehouse sector may be particularly needed where skills are low, such as in parts of South Bristol, and thus important to achieving the Council's vision for regeneration in this part of the City.

65. The Council has recognised some weaknesses in its approach to the delivery of industrial and warehousing land. Proposed changes (**S4.1.1** and **S4.8.1**) to BCS1 and BCS8 refer to 10 ha of new industrial and warehousing land in South Bristol focussed on the major regeneration areas. The SADM OD suggests several possible locations for this purpose within South Bristol. There are reasonable prospects of accommodating this scale of new land, with the Nover's Hill area being only one potential contributor of such land. These changes are necessary for soundness.

66. These changes still do not fully address the recommendation in the ELS for 24.5 ha of new land. However, the only credible location for a substantial additional allocation of such land would be in the Green Belt at Brislington as identified in the ELS. This is the same location identified as a potential urban extension. Development of 15ha for employment purposes would use most of the land necessary to accommodate the 800 homes which the Council assess as the capacity for housing here.

67. Given the evidence of demand, additional land for industry and warehousing here would help promote additional economic growth and jobs and ease the market perception of restraint on this sector. However, the Council is not pursuing ambitious economic growth, as reflected in its approach to housing provision. It is also strongly opposed to any development in the Green Belt. Bearing in mind the overall scale of provision of new employment in offices and other sectors and the intention to retain around 1,150 ha of existing industrial and warehousing land and encourage its renewal, the Council's choice to resist this one element of additional employment provision in the Green Belt is sound in the context of its overall strategy. The revised provision of additional land in South Bristol and the resistance to allocating all of the 24.5 ha recommended in the ELS are explained in Council proposed changes to the text in **S4.8.3**, **S4.8.4**, **S4.8.5** and **S4.8.6**. Revised targets relating to the changes to policy BCS8 are also necessary and are set out in Council proposed change **S4.8.9**.

PIWAs

68. Policy BCS8 states that the City's PIWAs will be retained for industrial and warehousing uses. This policy statement is unsound because it does not accurately reflect the Council intentions (including the loss of part of the St Phillip's Marsh PIWA to town centre uses); ignores the conclusion in the ELS that a few of the PIWAs are no longer fit for purpose; and does not take into account any changed circumstances since the PIWAs were defined on the Proposals Map or since the ELS. Whilst the aim is generally to retain and protect the PIWAs, the Council intends to review the designations through the emerging SADM DPD. The Council's proposed changes to policy (**S4.8.1A**) and to the implementation of this element of the policy under policy delivery (**S4.8.8**) make the position clear and are necessary for effectiveness.

Avonmouth

69. Economic activity at Avonmouth, including the port of Bristol, makes a very substantial contribution to the economy of the City. It is important regionally and, in some respects, nationally. The area has seen considerable new development and redevelopment in recent years and there remains strong market/developer interest, including for very large format warehouse/logistics premises and for new recycling and energy projects. The overall policy aim is to support its economic strengths and identifies it as a priority area for industrial and warehousing development and renewal. This is a sound approach.

70. The ELS considered that there was a sufficient supply of land at Avonmouth to meet demand over the plan period. For this reason, combined with the area's significant environmental constraints, the CS does not propose any additional greenfield land for development at Avonmouth. Since that assessment (in 2006/7) large areas have been developed for B2 and B8 uses. Although the ELS recognised the emerging demand for large format premises, the subsequent years have seen this demand strengthen. There remains considerable market interest in Avonmouth (and adjoining Severnside in South Gloucestershire) for premises in the range of 50,000 -70,000 sq m requiring sites larger than 10ha.

71. The Council produced for the hearings a table of commitments at Avonmouth at April 2010 and other known sites for employment development/redevelopment. But several of the sites which the Council regard as contributing to the pipeline supply are not now available to the market because of the advanced stage of negotiations with particular tenants. Several other sites are intended for specific energy or recycling projects not yet under construction, but at an advanced planning stage. There is no indication that other substantial brownfield opportunities would arise in the future beyond those identified in the Council's table. Whilst existing industrial and warehouse sites may be redeveloped to provide modern premises these would not represent new land nor be likely to be on the scale needed for large format premises.

72. The Council's table suggests that the pipeline supply has increased from that assessed in the ELS, but this increase is more than offset by the

evidence of strong and continuing demand for a wide range of site sizes and for a range of uses. The supply of brownfield developable land at Avonmouth, which is finite, will be insufficient to accommodate the market demand that wants to take advantage of the opportunities of this location.

73. Avonmouth should not be considered in isolation from Severnside (in South Gloucestershire) where there is an old, but extant planning permission for commercial development covering 650ha. Within this area, 260ha are being promoted as a distribution park (Central Park) with about 100ha being actively marketed. But there is no evidence of effective joint working between the adjoining authorities to assess demand for different types of land uses in this overall area or how the potential of the area could best be realised for economic growth. (The employment land study for South Gloucestershire had not been published at the time of the hearing on this issue.) Joint working is acknowledged for mitigating the impact of development, but not for accommodating demand. Accordingly, it cannot be assumed, as the Council appear to do, that the availability of land at Severnside will ensure that demand is accommodated effectively and that economic growth in the sub-region is not stifled.

74. Notwithstanding that existing commitments will be insufficient to meet demand at Avonmouth, there are substantial constraints on development here. The evidence relating to these constraints and how they might be mitigated is insufficient to be able to identify a clear way forward. These constraints are: Flood risk; Severn Estuary Special Area of Conservation (SAC) and Special Protection Area (SPA); and capacity on the Strategic Road Network (M5).

75. To date, new developments have responded to flood risk on a site-by-site basis and recent permissions have met the EA's requirements for mitigation. At the time of the hearing, a study was still to be completed to better identify the nature and extent of the flood risks affecting the area. This study will also review potential mitigation, such as improvements to the coastal flood defences, but will not provide a detailed assessment of likely costs. The EA's concern for a comprehensive, rather than site-by-site, approach to mitigating flood risk is understandable. But the evidence is not yet available to assess the feasibility of such a comprehensive approach. The latest study will assist, but consideration will also need to be given to the scale of development that could be accommodated in the area and what that might be expected to contribute to any mitigation scheme. The uncertainty around the other constraints means that no such assessment is yet possible.

76. The Habitat Regulation Assessment (at submission March 2010 CDE38 and updated report May 2010 CDE96) considered various potential effects on the Severn Estuary SAC and SPA. It notes (¶ 4.20.4) that the supporting text to BSC4 in the CS does not promote new allocations for employment development on greenfield land and comments that this should give a certain amount of protection to off-site habitats used by Severn Estuary SPA qualifying species. Uncertainties about the policy's impact on off-site habitats has led to a joint research project (Bristol City and South Gloucestershire Councils and Natural England - NE) to explore

possible habitat creation to negate any potential impacts from development on brownfield sites. The project will identify suitable greenfield sites for new or enhanced habitats for species displaced or disturbed by further development of brownfield sites in Avonmouth and Severnside. The identified sites will allow developers to secure off-site mitigation where required. The Council envisages sites for mitigation being identified in the SADM DPD.

77. The focus of the above study does not rule out further greenfield development at Avonmouth and it should assist in assessing the overall capacity of the area to acceptably accommodate development. But there is not yet the evidence to make such a comprehensive assessment. The Habitat Regulation Assessment Reports were founded on the assumption that there would be no further greenfield development. Any proposed change to the CS to set aside that assumption would need to be the subject of a revised Assessment and it is not clear that there would be evidence to conclude favourably as to the impact on the SPA. In the absence of the necessary evidence there would have been no purpose in testing alternatives involving greenfield development at earlier stages of the evolution of the CS.

78. The Council has not undertaken any assessment of the potential highway impacts of further development at Avonmouth as it regards policy BCS4 as a continuation of the current pragmatic approach to consideration of proposals on a site-by-site basis. Because of the close proximity of Avonmouth to junctions 18/18A on the M5/M49, the main highway impact is likely to occur on the Strategic Road Network which is the responsibility of the Highways Agency (HA). The HA note the uncertainty about the scale of development at Avonmouth, but consider that there is a reasonable prospect of a package of mitigation measures being identified and delivered for Avonmouth, although no further details are provided. The HA seeks a comprehensive Transport Management Plan to be developed for Avonmouth and Severnside, although it acknowledges the greater uncertainty at Severnside as a result of the scale of the extant old planning permission to which I have referred. The limited evidence currently available in relation to highway impacts means that a prescriptive, comprehensive approach to the scale and type of development at Avonmouth cannot be set out.

79. For an area of such great economic importance and environmental sensitivity it is unfortunate that so much uncertainty remains and that a clearer cross-border approach to Avonmouth/Severnside has not been adopted so as to accommodate demand in the most appropriate way and ensure a consistent approach to mitigation. There is not yet all the evidence necessary to plan the future of the area comprehensively. But given the scale of development that has occurred in the past few years, recent permissions and pending proposals, any future comprehensive approach may be too late to greatly influence matters. Although desirable, a comprehensive approach is not essential given that development has been progressed on a site-by-site basis to date.

80. Taking all these conflicting matters into account, policy BCS4 goes as far as is possible at present in seeking to promote development at Avonmouth, whilst recognising the environmental constraints. It is not prescriptive as to how development should be accommodated and does not rule out greenfield land, but neither does it promote such development, as explained in 4.4.12. The policy approach is sound, even though it may well result in further debate in the preparation and examination of the emerging SADM DPD. But at that stage the further evidence referred to above should help clarify matters.

81. In 2 detailed respects the wording of the policy does not properly reflect the Council's intentions and is not justified or effective. The policy states that the existing PIWAs will be retained, but the Council intends to extend the PIWA designation over all sites developed since the 1997 Local Plan, as well as the remaining brownfield opportunities and land with planning permission, but not yet developed. This is a sensible approach. This intention is broadly reflected in the draft PIWA notations shown in the SADM OD published in June 2010. Council proposed changes **S4.4.1** and **S4.4.3** clarify this matter. In addition, the last sentence of the policy on mitigation could be interpreted as seeking contributions to support development generally at Avonmouth rather than mitigating the effect of the particular development concerned. This would be contrary to the advice in Circular 5/2005. The Council's proposed change (**S4.4.2**) appropriately deals with this matter.

Issue 4 – Are there appropriate policies to address the accommodation needs of all sections of the community, consistent with national policy and local evidence?

Affordable Housing

82. On the basis of the evidence in the SHMA (CDE10), which is not undermined by other evidence, there is a well justified need for a substantial scale of affordable housing. The scale of need is more than is likely to be delivered in any realistic scenario. The need means that the Council is justified in seeking to maximise the delivery of affordable housing, subject to achieving other planning objectives and, crucially, ensuring that housing development is not made unviable such as to suppress delivery. The need and the contribution to supply from developments of fewer than 15 units justifies, in principle, seeking a contribution to affordable housing provision from schemes below the national threshold in PPS3.

83. The BNP Paribas Real Estate study *Bristol Housing Viability Study* November 2009 (CDE12) is a detailed piece of work by established consultants in this field. Viability outcomes depend on the assumptions about existing use values, sales values and development costs and the study reasonably seeks to show a range of possible outcomes in different circumstances. It applied its assumptions to sales values reflecting market conditions in 2007 around the peak of the market and in 2009 when the market was depressed. This reasonably reflects the range of market conditions likely to arise during the plan period. Obtaining finance

for development schemes may be very difficult at present, but this problem cannot readily be built into the model. It is one of several factors that justify a flexible approach to affordable housing provision, which is one of the recommendations of the Viability Study.

84. The Council produced a summary table showing the percentage of development scenarios likely to be viable in each of the 6 geographic zones identified in the policy, based on the affordable housing proportions sought. It was agreed that the focus should be on viability without any top-up public subsidy for affordable housing. In a buoyant market, the table indicates that several zones have a very high percentage of schemes considered likely to be viable, but in the North West and East zones only 50% of schemes are viable. In a depressed market, most zones still have more than 50% of potential schemes shown as viable. But in the North West zone only 25% of schemes are likely to be viable.

85. In response to concerns expressed at the hearing, the Council reviewed the evidence and assumptions applying to the weakest zones. In the North West zone the assumed density of development schemes has been increased from 30 dph to 50 dph. This is reasonable as policy BCS20 is sound which sets a minimum indicative density for the city of 50 dph. With this change, the proportion of schemes likely to be viable in a depressed market increases to 58% in the North West zone. Average sale prices in this zone are closer to the prices in the other 2 zones where 40% is being sought than the zones where 30% is being sought. This further work also indicates that the proportion of scheme scenarios that are likely to be viable would not materially change even if the affordable housing proportion in the North West was reduced from 40% to 35 % or reduced in the East zone from 30% to 20%. To significantly reduce the proportion sought would mean missing a significant potential contribution to affordable housing as and when market conditions improve.

86. The viability evidence does not support the inflexible wording of BCS17 in which scheme viability is indicated as an *exceptional circumstance* to be taken into account. The proportions sought should not be a *requirement* whereby failure to deliver would amount to a conflict with policy. The evidence supports the proportions as reasonable targets - a starting point for negotiations. Only small changes to the wording of the policy, as proposed by the Council, are required to achieve the necessary shift of emphasis to ensure that the policy is justified and effective (**S4.17.1** and **S4.17.2A** to policy BCS17 and **S4.17.4**, **S4.17.5**, and **S4.17.6** to the text and Policy Delivery).

87. Many schemes in some zones will currently need to be supported by viability evidence, placing a burden on the developer and the Council in preparing and assessing the required information. But this is necessary if the policy is to be effective in maximising affordable housing delivery by having a target which is realistic over the long term. The provision of financial information may be a deterrent to some developers, but it is widely provided for the purposes of assessing affordable housing.

88. The geographic zones used in the policy were not originally defined specifically in relation to affordable housing and were a given input to the viability study. But the zones are those used in the SHMA (CDE10 Fig 2.6) and reflect the Council's perception of sub-market areas. Some of the zones also mirror other spatial definitions, such as South Bristol (to which policy BCS1 applies). There is sufficient evidence to justify the different targets sought from the different zones. There are considerable differences in value (and thus considerable differences in likely scheme viability) within some of the zones and the boundaries of zones do not represent clear cut distinctions in market value. This is always likely to be the case wherever the boundaries are drawn. This reinforces the need for flexibility in the policy rather than the need to change the zones. The Council has proposed as minor changes (M4.17.9 and M4.17.10) additional monitoring targets and indicators for this policy which would include recording the differences in delivery between zones, enabling a review of boundaries if required.

89. The Council accepts that further work is required to explore the scope for and specification of any requirement to be secured from schemes of fewer than 15 units. The Council has proposed a change to BCS17 (included in **S4.17.1**) and text (**S4.17.3**) to explain that the detail of any such policy will be set out in the SADM DPD and thus subject to further examination. These changes also make clear that any contribution to affordable housing from such schemes should not, at this stage, be limited solely to financial contributions as originally proposed, but should allow for on-site provision, given that this is the normal expectation set out in PPS3. The Council has also accepted a change to the policy wording to reflect the fact that some intermediate units could eventually be lost from the affordable housing stock as a result of full ownership through stair-casing. To be effective, the policy needs to refer to the recycling of the original subsidy (**S4.17.2**). All these changes are necessary for soundness.

Housing Mix

90. Policy BCS18 does not give any steer as to what might be required in different parts of the city, but simply lists matters that should inform housing mix without indicating the objective to be achieved. The policy would be ineffective and unsound. The Council's proposed change **S4.18.1** rewords the list to indicate how developments should address the matters of concern (eg *contribute to diversity of housing*). Related changes to the text are proposed in **S4.18.2**. Further guidance is to be provided in SPD. Although the policy would still lack any local detail and leave much to interpretation and judgement, the changes are the minimum necessary to make it sound.

Gypsies and Travellers and Travelling Showpeople

91. Policy BCS19 indicates that suitable sites will be identified to meet the established needs of these groups for the period to 2011. The scale of need is set out in paragraph 4.19.4 and is drawn directly from the recommendations of the *Gypsy and Traveller Accommodation Assessment*

for the West of England (the former county of Avon) undertaken in 2006 (CDE13). The CS does not mention the fact, but the scale of need identified in the GTAA is the same as the requirement for Bristol City (to 2011) in the emerging RSS. There is no substantial evidence disputing the level of need and the identified need to 2011 is justified.

92. Needs beyond 2011 are not addressed in the CS and it is not justified to ignore the likely continuing needs of these groups after that date. Given the little weight attached to the Proposed Changes to the emerging RSS, undue reliance should not be placed on its suggested 3% growth assumption beyond 2011. Needs will have to be assessed in an updated GTAA. The Council's proposed change to policy BCS19 (**S4.19.3** and the consequential change **S4.19.1**) would introduce an acknowledgement of future needs in the policy and is the minimum necessary for soundness.

93. The *considerations to be taken into account* listed in the policy are reasonable factors and the wording ensures that they can be applied flexibly. Rightly, they are not all criteria that have to be met. What is lacking is any consideration of the acceptability of the living conditions for future occupiers of potential sites. As many gypsy sites in the country have in the past been located in poor environments this is an important omission. **S4.19.2** would remedy this unsoundness.

94. The policy also states that sites should not be located in the Green Belt. This is consistent with the Council's objective of accommodating all needed development primarily within the urban area. The Council has demonstrated active steps to accommodate the required pitches on allocations within the urban area. A number of such allocations are suggested in the SADM OD.

95. As proposed to be changed, the policy is consistent with national policy in Circulars 1/2006 and 4/2007. In a CLG Press Release 29 August 2010 it was stated that: *Ministers are today announcing their intention to revoke what they regard as flawed Whitehall Planning Circulars on travellers*. This referred to both Circulars. Even if little weight is now given to the Circulars, the proposed changes are required for soundness and the policy is required. As proposed to be changed the policy is consistent with and helps to meet several key objectives of the Core Strategy, namely: creating mixed, balanced and sustainable communities; appropriate housing provision; and better health and wellbeing.

Issues 5 Is the retail hierarchy in policy BCS7 justified by evidence and does the Core Strategy contain sufficient strategic guidance for the role of centres?

96. With the exception of the specific matters highlighted below, policy BCS7 and the hierarchy of centres which it sets out is sound. In accordance with the advice in the *Citywide Retail Study 2007* (CDE23) it was reasonable for the Council to decide to wait for the impact of the opening of Cabot Circus to settle down before assessing any opportunities for further retail development. The scope to guide further retail investment in the Core Strategy is therefore limited. The SADM DPD and

CAAP will provide the opportunity to respond to any new evidence on retail need and demand and for any more detailed policies for the management of particular centres.

97. The urban area of Bristol extends beyond the City Council boundary and the CS should acknowledge any significant role played by centres outside the city. The policy does not make clear that part of Kingswood town centre extends into Bristol City. This role is addressed in Council proposed changes **S4.7.1**, **S4.7.2** and **S4.7.3**. It is sound for the policy simply to list those local centres outside the city boundary which may provide services for some residents of the city, but which do not physically extend across the city boundary. With these changes, policy BCS7 would be consistent with national advice in PPS4 and is sound.

98. The role of Bristol city centre is set out in policy BCS2. The policy's proposals for housing and office development are considered under other issues. The policy proposes 2 areas for expansion of the city centre – the St Phillip's area north of the feeder canal and the Newfoundland Street area. It emerged at the hearing that the Council also intends that the former diesel depot site at Bath Road, close to Temple Meads Station (referred in places as the *Arena* site) is also to be included in the city centre boundary. Bearing in mind: the existing character of these areas; their relationship to the existing city centre and transport connections; the constraints on expansion elsewhere; and the advantages from maximising development in the city centre, these 3 expansion areas are justified. The diesel depot site is added to the expansion areas in BCS2 by Council proposed change **S4.2.2** and included in the vision for the city centre by **S3.2**. The structure of the policy caused some confusion and has been adjusted for clarity in this proposed change.

99. The St Phillips area shown on the City Centre Area and Key Diagrams includes railway sidings which the Council accepts should be retained for transport use and should not be covered by the notation for centre expansion. This correction and the addition of the former diesel depot site are included in changes **S4.2.6** and **S11.1** to these Diagrams and are necessary for consistency and effectiveness.

100. Policy BCS2 does not purport to identify all *regeneration areas* or all *gateways* and it is not essential to do so for soundness. Whilst the Newfoundland Street area would become a new gateway to the city, its naming as such is not crucial to the proper planning of the area. The CAAP will provide the opportunity for more detailed policies in this and other regeneration areas and gateways. With the changes identified above, policy BCS2 would be sound.

101. Policy BCS1 for South Bristol indicates that a new centre either on a new site or at an enhanced existing centre may be appropriate as a new focus for the area. This part of the policy is unsound because of the uncertainty it creates, bearing in mind the large area encompassed by the South Bristol policy, which includes several existing centres, and the implication that the scale of any new centre would be significant for the area as a whole.

102. By the hearing on this matter, the Council's position had been informed by further evidence which had assessed this issue in some detail (*South Bristol Centres and Retail Study Final Report* May 2010 CDE94). This identifies an opportunity for a new/enhanced centre to serve the Knowle West area. The Council is exploring this concept further as part of the Knowle West Regeneration Framework which in turn will inform the SADM DPD. The Council's proposed change to BCS1 (**S4.1.2**) and corresponding change to the Area (**S4.1.4**) and Key (**S11.1**) diagrams reflect this more focussed approach. Proposed change **S4.7.4** indicates that any new centre would be likely to be a *district* rather than a town centre. These changes are necessary for effectiveness by providing a clear steer as to the general location and scale of any such new centre. The remaining uncertainty as to whether it will proceed and precisely where if it did, does not undermine the overall approach to South Bristol and does not make policy BCS1 unsound.

Issue 6 - Is the necessary infrastructure needed to accommodate the planned strategy identified and is it deliverable?

103. The *Infrastructure Delivery Programme (IDP)* (March 2010) (CDE27) is an important evidence document. The Council has updated the IDP (June 2010 CDE95) and revised the projects which are regarded as *essential* and *desirable*. The revised IDP takes a comprehensive approach to the identification of infrastructure and provides sufficient clarity about projects, notwithstanding inevitable uncertainties about some long term items. Although many projects are identified as *essential* there is no major single scheme for which the timing of delivery is absolutely critical to the progress of the overall strategy. Flood defences for the city centre would have been critical for the scale of housing originally proposed, but the uncertainties about delivery have resulted in housing on sites in Flood Zone 3 with climate change being excluded as discussed under Issue 2. Provision of services such as sewage treatment and school places are clearly critical elements of infrastructure, but can be undertaken as development proceeds and there are no major obstacles to their delivery.

104. Paragraph 4.11.3 of the CS refers to *The West of England Infrastructure Study (Responding to Infrastructure Delivery and Planning Issues in the West of England)* (CDE79/80). This was not formally published until after the submission of the Core Strategy, but preparation of this study informed the assessment of infrastructure needs and delivery to some degree. It focuses on infrastructure needs for major development areas only. It is not as clear or as up to date as the June 2010 version of the Council's IDP. The reference to the West of England Study at 4.11.3 of the CS is unnecessary and confusing, hindering effectiveness. This would be deleted by Council proposed change **S4.11.1A**, which is necessary for soundness.

Transport

105. The CS refers to major transport schemes which are in the *West of England Joint Local Transport Plan (JLTP)* 2005/6 - 2010/11 (CDE3). These major schemes are being taken forward in bids for funding through

the West of England Partnership. Possible transport projects have also been informed by the *Greater Bristol Strategic Transport Study* June 2006 (CDE4), related work (CDE5) and further review and analysis. There is nothing to suggest that the next JLTP will alter priorities. Any new major schemes which the next JLTP includes are unlikely to be implemented before 2026.

106. The detailed description and presentation of rail projects needs to be clarified but, in general, the close alignment between policy BCS10 and the JLTP, reflecting as it does joint working across the sub-region, and the good progress made on a number of those projects, indicates that the plan is fundamentally sound on this issue. As anticipated in the discussion at the hearing, the outcome of the Spending Review is likely to cause some delay in implementation, but does not undermine the credibility of the projects as the appropriate mix of long term transport solutions for the city. Additional wording proposed by the Council under Policy Delivery (**S4.10.3**) anticipated this change of circumstances and refers to small scale enhancements being carried out to the bus network and to walking and cycling routes in the interim before major projects can be implemented. This addition provides a sound context for the inevitable uncertainties about the timing of major projects.

107. The Callington Road Link listed in policy BCS10 was not recommended to be taken forward in the Strategic Transport Study. Since that work, the scope of the scheme was enlarged and seen to have clearer benefits. It is included in the JLTP as a longer term scheme requiring further work. Its listing in policy BCS10 does not prescribe the precise nature of the link proposed. In the short term, the Council is seeking to implement an off-road cycleway along the route to achieve a missing link in the strategic cycle network in this area (CDE111). Reference to the Link in policy BCS10 is sound despite uncertainty about the final form and timing of the Link.

108. A number of parties suggested revisions to the detailed design or routing of particular transport schemes, a different priority between modes, the identification of Bristol Temple Meads as a major transport interchange, and the need for a sub-regional transport authority. Some of these suggestions may well have merit, but there is no substantial evidence to demonstrate that they could be delivered, even if they were to be identified in the Core Strategy. Many of these alternatives would require a cross-boundary approach. More crucially, seeking to alter or add to the existing agreed schemes in the JLTP, which are the product of joint working and long gestation, would jeopardise their progression and thus represent unsound changes to the plan.

109. Notwithstanding the favourable assessment above, the reference to rail improvements in policy BCS10 is too brief to properly distinguish the nature of the projects and priorities as listed in the JLTP and the IDP. In addition, the corresponding representation of rail on the Area and Key Diagrams is inaccurate. The position is sufficiently confused to jeopardise effectiveness. The matter is adequately clarified in the Council's proposed change **S4.10.1A** which identifies 2 prioritised rail schemes and other

longer term projects. The appropriate clarification of rail proposals is made on the Area and Key Diagrams by **S4.1.4**, **S4.2.6**, and **S11.1** which are necessary changes.

110. Given the clarity introduced by the above changes, it is not essential for the CS to refer to the safeguarding of land for 3 or 4 tracking of the railway at Filton bank, which is likely to be required for the implementation of the railway schemes listed. This improvement is recognised in Network Rail's West of England Route Plan and can be carried out on its operational land. The report *Cycling Expressway Feasibility Study* (CDE112) did consider a cycle route on this operational land, but recommended no further action be taken on this aspect of the scheme. Additional text proposed by the Council (**S4.10.1**) indicates that appropriate transport facilities, such as depots, will be safeguarded. This is a necessary change to ensure that the intended greater provision of public transport services is not undermined by loss of support facilities. This safeguarding can be implemented through the SADM DPD and CAAP (**S4.10.2**).

111. There may be tension between the use of some potential public transport corridors for walking and cycling routes which are feasible in the short term and longer term major projects. It is necessary for effectiveness to ensure that the latter are not prejudiced by the former. This is achieved by additional wording prefacing the list of transport user priorities in policy BCS10 by Council proposed change **S4 10.1B**. This change also rightly clarifies that the needs of disabled people should be taken into account across all schemes.

Other Infrastructure and Developer Contributions

112. Policy BCS9 is a wide ranging policy covering all types of green infrastructure. Part of the policy refers to possible loss of green infrastructure where *unavoidable*. This wording is ineffective because no basis is given for assessing what circumstances constitute *unavoidable*. The Council's proposed changes (**S4.9.1** and **S4.9.2**) remedy this. The reference to *on balance* in the first change is appropriate as it indicates a necessary weighing of the general protection afforded by the policy against any competing priorities of the Core Strategy.

113. The City's indicative green infrastructure network is shown on Diagram 4.9.1 and some parts of this network follow rail corridors. With the changes to policy BCS10 and the Key Diagram discussed above, this diagrammatic green network does not give rise to any conflict with transport proposals.

114. The policy delivery text for BCS11 makes clear that obligations from developers will be sought in accordance with the guidance in Circular 5/2005. Parts of policies BSC11 and BSC12 and the supporting text are unsound because they blur the necessary distinction between S106 contributions, which are concerned with mitigating impact, and any CIL, which could support infrastructure more generally. As submitted, the policy is not justified. The Council's changes clarify this distinction and are

sound (**S4.11.1**, **S4.11.2**, **S4.11.3**, and **S4.11.4**). The Council has agreed that the wording of these changes should be amended to delete the reference to *other future mechanisms* now that it is clear that CIL is to be retained.

115. Policy BCS12 overlaps confusingly with BCS11, but with the above changes BCS12 can be concerned solely with community infrastructure. This is achieved by **S4.12.1**. The intention of the policy is also given greater clarity by minor changes which replace the term *community infrastructure* with *community facilities* throughout the policy and related text. By change **S4.12.2** the Council wants to incorporate in the policy the last sentence of the CS text at 4.12.15. This refers to new community facilities being in adaptable mixed-use buildings and is a sound addition to the policy.

Issue 7 Are there appropriate policies to respond to climate change, for renewable energy and for sustainable construction, consistent with national policy and local evidence?

116. Policies BCS13, BCS14 and BCS15 are related policies which address climate change, sustainable energy, and sustainable construction respectively. Although there is considerable overlap in the aims of different parts of the policies that does not make them unsound. BCS13 sets out the overall policy requirements, whilst BCS14 and 15 address certain elements of the requirements in more detail. Policy BCS13 is wide-ranging in its scope, but its aims are consistent with national policy and it is appropriately flexible in how its requirements can be met.

117. Policy BCS14 is in 3 parts, which the Council proposes to re-order as a minor change. This re-ordering provides a more logical sequence and I have followed it here. The first part sets out the considerations for assessing proposals for renewable and low carbon sources of energy production and distribution. It affords *significant weight* to the environmental and economic benefits of such developments. This accords with national policy, is sound and does not require further elaboration.

118. The second part sets out a simple energy hierarchy to be applied to new development and is sound. It also seeks the use of at least 20% renewable energy generation to reduce carbon dioxide emissions from residual energy use. The wording as submitted lacks clarity and flexibility which would make it ineffective. Council proposed changes (**S4.14.1** to the policy and **S4.14.3** to the text) acknowledge that exceptions may need to be made if the requirement would not be viable or technically feasible for specific developments. Furthermore, Council proposed change (**S4.14.5**) makes clear that the use of renewable energy sources for combined heat and power (CHP) systems or for community heating will count towards the 20% requirement. Thus the requirement is often likely to overlap with, rather than be additional to, other aspects of the policy and will not require the 20% provision to be secured exclusively on site. These changes would make this part of the policy sound.

119. The third part of the policy encourages the use of CHP and similar technology and the use of district heating networks. The *City Wide Sustainable Energy Study* (CDE6) provides sufficient evidential justification for CHP and district heating networks as the best means for Bristol to provide sustainable energy and for the extent of Heat Priority Areas. Whilst the aim of the policy is justified, it lacks effectiveness in how it will be implemented, bearing in mind that substantial CHP and district heating networks are not yet in place and that a flexible approach will be required in the next few years. The Council's proposed changes (part of **S4.14.1** to the policy and **S4.14.4** and **S4.14.6** to the text) indicate that only major developments will be expected to incorporate infrastructure for district heating within the defined Heat Priority Areas and only where feasible to do so. In addition, the Council propose (**S4.14.1A**) that the hierarchy of practical considerations regarding CHP set out in paragraph 4.14.8 of the Core Strategy be included in the policy, thus providing a clear structured approach to how the policy is to be applied. Revised indicators are set out in **S4.14.7**. These changes make the policy sound.

120. Policy BCS15 is concerned with sustainable design and construction. The first part of the policy lists matters which should be addressed. Although there is overlap with policies referred to above, this does not make the policy unsound and this part of the policy is not unduly prescriptive. The second part of the policy requires specific levels of the Code for Sustainable Homes (CfSH) to be met earlier than the current programme for changes to the Building Regulations to reflect the energy requirements of those Code levels.

121. The Supplement to PPS1 *Planning and Climate Change* (paragraphs 31-33) sets out criteria against which any local requirements for sustainable buildings should be justified. Neither the supporting evidence at submission nor that submitted after the hearing adequately addresses these requirements. In particular, the *local circumstances that warrant and allow* the imposition of such local standards is not made clear. The Supplement also indicates that any such local standard should be on an area or development basis, not across the whole plan area. The *Energy Study* (CDE6) indicates the difficulties of trying to accelerate higher CfSH levels. The fact that the Council has made various public commitments to being a green city and to CO₂ reduction does not provide sufficient justification because, in isolation, such commitments do not demonstrate practical deliverability.

122. To be sound, the table in policy BCS15 setting out accelerated requirements for CfSH levels should be deleted. The Council consider that the policy is acceptable as submitted so this deletion is a required change in Appendix C (part of **IC4.15.1**, and **IC4.15.2**). The Council was aware of this possible imposed change and suggested replacement text for the policy. This suggested text is largely used as the replacement requirements of the policy (part of **IC4.15.1**). This will ensure that sustainable construction is given proper consideration. It is reasonable to expect all residential developments to achieve CfSH 6 from 2016, but only if the energy requirements of that Code level have been embedded in the

Building Regulations by that date. The consequential additions and amendments to the supporting text are set out in **IC4.15.3**, **IC4.15.4**, **IC4.15.5** and **IC4.15.6**. Changes to the related monitoring indicators and targets are made in **IC4.15.7**. These changes to BCS15 should not significantly weaken the Council's overall strategy for reducing carbon emissions. Developing the infrastructure to secure delivery of district-wide heating is the key to facilitating zero carbon homes by 2016 and this remains the focus of policy BCS14.

Issue 8 Is there appropriate strategic guidance on density, design and conservation consistent with the overall strategy and national policy?

123. Policy BCS20 specifies a minimum indicative density of 50 dph and seeks higher densities in and around centres and main public transport routes. The Council's evidence shows that in recent years on sites of more than 10 dwellings the average density in suburban Bristol was 53 dph and much higher densities were achieved in the Central and Inner Areas (as defined in the Local Plan). As explored under Issue 2, there is a clear need to maximise housing delivery within the urban area. The deletion of the minimum indicative density of 30 dph from PPS3 has no impact on the justification for, or likely delivery of, the policy, which is sound. Minor changes to this section usefully clarify some matters and the purpose of Diagram 4.20.1.

124. Policy BCS21 on urban design lists many factors which new development will be expected to achieve. These design requirements are generally applicable and are not locally distinctive. More detailed design policies remain among the saved local plan policies which will be replaced by detailed policies in the SADM DPD and CAAP. Accordingly, policy BCS21 needs only to set out the overall approach and its lack of local detail does not make it unsound.

125. Policy BCS21 also requires development to meet specified scores under CABI's *Building for Life* design assessment tool. These scores are set out in the policy. This requirement is not justified. Formal *Building for Life* assessments and resulting scores can only be undertaken by trained assessors. The wording of the policy would create a clear policy conflict if a scheme scored less than the specified level. This would, in effect, devolve the decisive assessment of planning applications from the corporate Local Planning Authority to the individual assessor. There would be no scope for the decision maker (whether an individual or a Committee) to come to a different view of a scheme's compliance with the policy to that of the qualified assessor. The Council has accepted the need to avoid undue pre-determination of an application. Proposed changes (**S4.21.1** to the policy and **S4.21.2** to the text) require major development with a residential component to be assessed (informally) in the Design and Access statement against *Building for Life*, but the scores are now a guide as to what schemes should aim to achieve rather than being decisive. The applicant would not have to use an accredited assessor, but a formal assessment would be undertaken by the Council. These changes would make the policy sound.

126. Policy BCS22 is a general policy aiming to safeguard and enhance a range of heritage assets. As with policy BCS21, the policy lacks local distinctiveness, but the necessary locally specific policies will be included in the SADM DPD and the CAAP. Policy development and delivery will be informed by a city wide urban context analysis. Minor changes ensure consistency in how this further work is referred to in the CS and clarifies its role.

Issue 9 Are there clear indicators and targets which will measure the effective implementation of policies?

127. Proposed indicators and targets are set out at the end of each policy section. Chapter 5 of the document (Monitoring and Review) indicates an intention to undertake a 5 year cycle of more comprehensive monitoring and review. At submission, this section also set out the triggers and delivery mechanism for the 3 housing contingencies. However, given the changes already referred to, this separate element of monitoring is not required and the specific housing contingencies in this part of Chapter 5 can be deleted as proposed by the Council (**S5.1**).

128. A number of changes to targets and indicators have already been referred to and others have been treated as minor changes. At the outset of the Examination I expressed some concern about the adequacy of the indicators and targets, but monitoring should not be made unduly onerous or disproportionate. Overall, with the changes proposed, the plan is sound in relation to monitoring.

Issue 10 Other matters

Does the CS give adequate guidance in relation to minerals and waste?

129. The submitted CS was silent on minerals and waste. New explanatory text added in the minor amendments at submission dealt adequately with waste, explaining that the 4 unitary authorities within the former County of Avon have a Joint Waste Core Strategy. As there is to be no separate minerals plan covering the city, the CS needs to address minerals in so far as is necessary. There is no active mineral working within the city and the West of England Partnership has agreed that the city need not make any contribution to sub-regional requirements.

130. The Coal Authority provided plans showing the extent of surface coal reserves with potential economic value and the extent of past mine working with potential implications for land stability. MPS 1 makes clear that Mineral Planning Authorities should define *Mineral Safeguarding Areas* (MSAs) in DPDs in order that proven resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked. In this context, the absence of any strategic mention of safeguarding and land stability issues in the CS makes it unsound.

131. Additional text proposed in **S1.1** has been agreed between the Council and the Coal Authority. This indicates that a specific safeguarding policy and the related designation on the Proposals Map will be made in

SADM DPD. The text also sets out some principles to be applied in the interim. The plans provided by Coal Authority would be added as Appendix E of the CS by **S12.1**. These additions are sufficient to remedy this unsoundness. The original omission of this matter does not undermine the overall strategy. There is no evidence that any other mineral resource needs to be addressed.

Flooding and flood risk

132. I have already referred to the implications of flood risk in the city. The Council published a *Flood Risk Position Paper (October 2010)* in response to the need to take into account the greater extent and risk of flooding as a result of climate change. The SFRA had mapped the area of zone 3 with climate change only in and around the areas of greatest risk. Outside these areas the Council has had to assume that the existing flood zone 2 will become flood zone 3 with climate change. Whilst this is a crude approximation, it is adequate for testing that the strategy is PPS25 compliant. This further work, and the importance of still applying the sequential and exceptions tests when making choices in the SADM DPD and the CAAP, is set out in additional paragraphs of text to accompany policy BCS16 in **S4.16.1** and **S4.16.2**. Amendments to the wording have been agreed by the Council to respond to concerns expressed during consultation. These changes include wording agreed with the EA and a reference to taking into account any more recent evidence when assessing whether a site is in flood zone 3 with climate change. These changes, as amended, are necessary for soundness.

Legal Requirements

133. My Examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. The Core Strategy meets them all except that the Core Strategy has not been progressed within the timetable in the LDS. But this breach of the Regulations is not prejudicial to any party.

LEGAL REQUIREMENTS		
Local	Development	The Core Strategy is identified in the approved LDS (CDE46) March 2007. That set out a submission date of June 2008 and adoption by October 2009. That LDS timetable is clearly out of date and has been missed. The Council explained that it has been working to an interim timetable and that a revised LDS will be produced. The interim timetable envisaged submission in February 2010, which had slipped only slightly, and adoption by December 2010. The Examination has become protracted because of the need to address the changing circumstances in relation to regional plans and the local justification for the scale of housing. Whilst the document is not progressing as planned, no interested party should have been
Scheme (LDS)		

	unaware of the work on the Core Strategy and the failure to formally revise the LDS timetable should not have caused any prejudice. No concerns had been raised by the Government Office. The Core Strategy's content is compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2008 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed changes.
Sustainability Appraisal (SA)	SA has been carried out as the document has evolved. The process has not been independently verified, but has been adequate.
Appropriate Assessment (AA)	The Habitats Regulations Assessment Report at submission is that of March 2010 (CDE38). This was amended in the light of comments by Natural England (NE). The final version is dated May 2010 (CDE96). The report concludes that the Core Strategy would not have significant adverse effects on relevant interests. This conclusion is accepted by NE. The report is fit for purpose.
National Policy	The Core Strategy complies with national policy except where indicated and changes are recommended to meet this requirement.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

134. I conclude that with the changes proposed by the Council, set out in Appendix A, and the changes that I recommend, set out in Appendix C, the Bristol Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. For the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix B.

Simon Emerson

Inspector

This report is accompanied by:

Appendix A (separate document): Significant changes proposed or accepted by the Council that go to soundness.

Appendix B (separate document): The Council's Minor Changes.

Appendix C (separate document): Changes that the Inspector considers are necessary to make the plan sound.

Appendix A

Significant changes proposed or accepted by the Council that go to soundness

This schedule contains significant changes necessary for soundness proposed or accepted by the council.

Text to be deleted is shown with ~~striketrough~~ and text to be added is shown underlined.

Some of the changes that were in this schedule when it was published for consultation in December 2010 have been deleted by the Inspector so as to retain the text of the Core Strategy as submitted. With the agreement of the Council there has been minor editing of some of the changes for clarity and accuracy. These changes to the published schedule are noted where they occur.

Change No.	Policy / Paragraph	Proposed Change
Introduction Chapter		
S1.1	New paragraphs 1.15-1.21	<p><u>Minerals and Waste Planning</u></p> <p><u>Minerals</u></p> <p><u>1.15 The extensively built up character of Bristol provides no commercially attractive opportunities for mineral development and there is currently no active mineral extraction within the city.</u></p> <p><u>1.16 In view of the lack of opportunities for mineral extraction in Bristol and in Bath and North East Somerset it has been agreed by the West of England Unitary Authorities that any apportionment for aggregate production should be shared between North Somerset and South Gloucestershire Council areas. This follows past patterns of apportionment set out in the Structure Plan for the West of England. It is not expected that Bristol will contribute to mineral production for the sub-region.</u></p> <p><u>1.17 The Core Strategy does not include minerals policies as mineral extraction is not considered to be of strategic importance within the city. However, it is acknowledged that there are a number of detailed mineral related issues which require policy coverage. It is proposed that these be addressed in the council's Site Allocations and Development Management DPD and would include:</u></p> <ul style="list-style-type: none"> <u>The designation of Mineral Safeguarding Areas, consistent with the requirements of Minerals Policy Statement 1, following the methodology set out in the BGS document "A Guide to Mineral Safeguarding in England." The aim would be to ensure that any surface coal resources in East and South Bristol and any other mineral resources which have the potential for future exploitation</u>

Change No.	Policy / Paragraph	Proposed Change
		<p><u>are safeguarded from non-mineral surface development and site allocations which may result in their sterilisation. Any proposed Mineral Safeguarding Areas would be subject to consultation and ultimately shown on the Proposals Map.</u></p> <ul style="list-style-type: none"> • <u>A policy to take account of the need to address land instability arising from former mineral workings, associated mining legacy/hazards and the suitability of the restoration proposals undertaken, as required by Planning Policy Guidance Note 14 and Minerals Policy Statement 1, to ensure public safety and to prevent unnecessary expenditure falling on the public purse.</u> • <u>A policy to state the criteria to be used in assessing mineral proposals and in formulating conditions.</u> • <u>Criteria built into the site allocation methodology to ensure that the impact of mineral sterilisation and ground conditions, including mining legacy that arises, are properly considered in the site selection process with any necessary remediation measures then identified in the Site Allocations and Development Management DPD.</u> <p><u>1.18 Until new policies are adopted in the Site Allocations and Development Management DPD, development proposals in the surface coal areas of South and East Bristol will be considered in the light of:</u></p> <ul style="list-style-type: none"> • <u>the potential for prior extraction of coal and the need to avoid unnecessary sterilisation; and</u> • <u>potential ground instability associated with historic mining and the need for related remedial measures</u> <p><u>1.19 The general extent of coal resource areas and of legacy areas is shown in the diagrams in Appendix E.</u></p> <p><u>Waste</u></p> <p><u>1.20 The four Unitary Authorities within the West of England have prepared a Joint Waste Core Strategy (JWCS) which will form part of the development plan for Bristol. As advised in PPS12, the JWCS sets out the strategic spatial planning policy for the provision of waste infrastructure across the plan area. It sets out the Authorities' aspirations for all levels of waste management until 2026: prevention, reuse; recovery and disposal.</u></p> <p><u>1.21 The JWCS contains policies to direct the development of non-residual waste treatment development (that involving recycling, composting,</u></p>

Change No.	Policy / Paragraph	Proposed Change
		storage and transfer of wastes) and for the disposal of waste. To enable consistency across the plan area the JWCS also provides a development management policy that is relevant to waste development proposals. This will be considered alongside each Authority's other development management policies.
Spatial Vision and Objectives Chapter		
S3.1	A trans-formed South Bristol	<ul style="list-style-type: none"> It will contain a vibrant new heart with major new leisure, employment, education and community hospital development at Hengrove Park.
S3.2	A growing city centre	<ul style="list-style-type: none"> To accommodate growth the city centre's boundaries will expand to take in St. Philip's north of the Feeder, <u>the former diesel depot site on Bath Road</u> and the Newfoundland Street area.
S3.3	A city of sustainable travel	<p><i>Append:</i></p> <ul style="list-style-type: none"> <u>Rail services will be improved.</u>
S3.4	Housing to meet local needs	<p>Housing to <u>help</u> meet local needs Provision of a mix of homes, together with social infrastructure, will aim to <u>help</u> stabilise housing affordability and <u>help</u> meet the needs of a growing and changing population.</p>
Delivery Strategy Chapter		
<i>South Bristol</i>		
S4.1.1	BCS1	<p>South Bristol will be a priority focus for development and comprehensive regeneration. Development will be for a mix of uses to include:</p> <ul style="list-style-type: none"> <u>Around 60,00050,000m² of net additional new office floorspace focused on centres and the major regeneration areas;</u> <u>Up to 5 to 10 hectares of new industrial and warehousing land at Nover's Hill / Vale Lane focused on the major regeneration areas;</u> <u>A minimum of The provision of around 8,00010,000 new homes of a mix of type, size and tenure.</u>
S4.1.2	BCS1	<p>A new centre, either on a new site or at an enhanced existing centre, may be appropriate <u>to serve the Knowle West area</u>in South Bristol, acting as a new focus for <u>in</u> the area and helping to improve provision of shops, services, employment and community facilities.</p>
S4.1.2A	New paragraph 4.1.10A	<p><u>4.1.10A There is potential for around 2,200 homes to arise in regeneration sites at Knowle West. This potential has not been included in the 8,000 homes identified in policy BCS1. However, this level of development would be consistent with the spatial strategy and would represent an acceptable additional level of supply if brought forward during the plan period.</u></p>

Change No.	Policy / Paragraph	Proposed Change
S4.1.3	New paragraph 4.1.12	<u>4.1.12 At the start of the plan period in 2006 there was around 40,000 m² of net additional office floorspace in South Bristol with planning permission. Policy BCS1 proposes that a further 60,000 m² of net additional floorspace is provided in the period to 2026.</u>
S4.1.4	Diagram 4.1.1	<p><i>Remove 'Potential New Centre (location to be determined)' and 'Proposed location for industrial/warehousing development' from Legend and their icons from the diagram.</i></p> <p><i>After 'Area of focus for major regeneration', insert 'to include potential new centre and locations for employment development'.</i></p> <p><i>Remove 'Urban Extension: Areas of search for urban extensions outside the city boundary' from Legend and Icons from diagram</i></p> <p><i>"Existing passenger rail network" - Darken the route shown on the key diagram and the symbol in the accompanying legend so it is clearer.</i></p> <p><i>Delete "Currently no passenger service rail line" text from the legend but leave the route shown on the Key Diagram to the west of the city (Portishead rail line). Replace text with "Reopening of the Portishead rail line for passenger use".</i></p> <p><i>Insert "The Greater Bristol Metro Rail Project" on the legend and illustrate the routes on the key diagram.</i></p> <p><i>(See Appendix 1)</i></p> <p>Inspector's Note: The previously proposed "Remove 'Contingency for future development in southeast Bristol – Up to 1500 homes' from Legend and Icon from diagram" does not form part of the recommended proposed changes and should be retained on the Diagram, subject to an Inspector change in Appendix 3.</p>
<i>Bristol City Centre</i>		
S4.2.1	New paragraph 4.2.8A	<u>Parts of the city centre are at risk of flooding, a risk which is likely to increase as a result of climate change. This key constraint is likely to play a key role in shaping the future development of the area.</u>
S4.2.2	BCS2	<p><u>Bristol City Centre's role as a regional focus will be promoted and strengthened. Development will include mixed uses for offices, residential, retail, leisure, tourism, entertainment and arts and cultural facilities.</u></p> <p>The city centre boundary will expand into:</p> <ul style="list-style-type: none"> • The St. Philip's area, north of the Feeder Canal; • The Newfoundland Street area; and • <u>The former diesel depot site, Bath Road</u> <p>Development will include mixed uses for offices,</p>

Change No.	Policy / Paragraph	Proposed Change
		<p>residential, retail, leisure, tourism, entertainment and arts and cultural facilities.</p> <p>Development up to 2026 will include:</p> <ul style="list-style-type: none"> • <u>Around 150,000m² of new net additional high quality office floorspace;</u> • <u>9,000-The provision of around 7,400 new homes;</u> and • improved transport systems and connectivity, including new public transport, pedestrian and cycling routes and transport hubs.
S4.2.3	New paragraph 4.2.9A	<p><u>4.2.9A However, as residential development is more vulnerable to flooding than other land uses flood risk will need to be taken into account. The greater risk of flooding that could arise from climate change and the need for further work to ensure the delivery of effective mitigation of that risk have, for the time being, limited the residential capacity of the city centre compared to earlier estimates. The present estimate is that there is capacity over the plan period for around 7,400 dwellings in the area, of which just over 6,000 are already completed or committed and the remainder of which could be achieved just using land within Flood Zone 1. Consequently, while the delivery of 9,000 homes in the area remains an aspiration, any additional capacity in the area will have to emerge from further detailed sequential and exception testing work undertaken as part of the Bristol Central Area Action Plan.</u></p>
S4.2.4	New paragraph 4.2.11	<p><u>4.2.11 The city centre has a large pipeline stock of office development, with around 270,000 m² net additional office floorspace identified at the start of the plan period. Policy BCS2 proposes that around a further 150,000 m² of net additional floorspace is provided in the period to 2026.</u></p>
S4.2.5	Paragraphs 4.2.11-13	<p><i>Renumber as 4.2.12-4.2.14</i></p>
S4.2.6	Diagram 4.2.1	<p><u>Amend proposed extension to city centre at St Philip's (part) to exclude area of rail siding.</u></p> <p><u>Show former diesel depot as proposed extension to city centre and add to legend.</u></p> <p><u>Amend legend to refer to 'Improvement of City Centre gateways'.</u></p> <p><i>"Existing passenger rail network" - Darken the route shown on the key diagram and the symbol in the accompanying legend so it is clearer.</i></p> <p><i>Delete "Currently no passenger service rail line" text from the legend but leave the route shown on the Key Diagram to the west of the city (Portishead rail line). Replace text with "Reopening of the Portishead rail line for passenger</i></p>

Change No.	Policy / Paragraph	Proposed Change
		<p>use".</p> <p>Insert "The Greater Bristol Metro Rail Project" on the legend and illustrate the routes on the key diagram.</p> <p>(See Appendix 1)</p>
Northern Arc and Inner East Bristol – Regeneration Areas		
S4.3.1	BCS3	Development will include the provision of about around 2,000 new homes.
S4.3.2	BCS3	<p>Development will include:</p> <ul style="list-style-type: none"> • The provision of a minimum of around 3,000 new homes; • The redevelopment of Southmead Hospital to provide a new acute and community 'super-hospital'.
Avonmouth and Bristol Port		
S4.4.1	BCS4	The area's existing Principal Industrial and Warehousing Areas will be <u>identified and</u> retained for industrial and warehousing uses. Development in these areas for those uses will be supported in principle. Proposals for port-related activities, manufacturing industry, logistics / distribution, waste management and other environmental technology-related industries will be particularly encouraged. There may be opportunities for the development of energy from waste facilities, biomass energy and further large-scale wind turbines.
S4.4.2	BCS4	Development will be expected to respect the area's environmental assets and take account of its physical constraints. Proposals will be expected to contribute to both the strategic and local infrastructure necessary to <u>mitigate any adverse impacts that would result from the development</u> service the development and support development in Avonmouth. Freight and passenger rail infrastructure sites will be safeguarded.
S4.4.3	Delivery	The Site Allocations & Development Management DPD will identify the Principal Industrial and Warehousing Areas <u>with reference to the Employment Land Study as explained in the delivery section of Policy BCS8.</u> The identified Areas will also include locations which have been developed for industry and warehousing since the <u>Employment Land Study surveys were undertaken and any greenfield sites with unimplemented planning permissions.</u> The <u>Site Allocations and Development Management</u> DPD will also identify important freight and passenger rail facilities and infrastructure in Avonmouth for safeguarding.
Housing Provision		
S4.5.1	4.5.1	4.5.1 This policy sets out <u>addresses</u> the level of new homes planned to be delivered <u>developed</u> in Bristol between 2006 and 2026. A number of contingencies have also been identified to allow for possible increased

Change No.	Policy / Paragraph	Proposed Change
		numbers and to ensure a continuous supply. The policy sets out a flexible approach to housing delivery in the absence of the Regional Spatial Strategy, which at the time of publication of this strategy has been delayed due to legal concerns.
S4.5.1A	New paragraphs 4.5.3 – 4.5.8	<p><u>Context</u></p> <p><u><i>Planning for New Homes</i></u></p> <p><u>4.5.3 The amount of new homes for which the Core Strategy should plan has been based on assessing a range of evidence sources. Conclusions have been drawn and choices made in response to considering that evidence.</u></p> <p><u><i>Potential Need and Demand for New Homes</i></u></p> <p><u>4.5.4 The main sources of evidence used to consider the potential need and demand for new homes have been the West of England Strategic Housing Market Assessment (SHMA), the government's demographic projections and forecasts of economic growth.</u></p> <p><u>4.5.5 Housing need is defined in PPS3 as the '<i>quantity of housing required for households who are unable to access suitable housing without financial assistance</i>'. The SHMA indicates that housing need in the city is likely to remain high throughout the Core Strategy period. The SHMA also acknowledges the policy limitations of delivering affordable housing. Given much reduced levels in public subsidy for affordable housing it is clear that supply will increasingly rely on private development. Policy BCS17 indicates that 30% to 40% affordable housing will be sought within private developments, having regard to economic viability. At these proportions the level of market housing required to address identified need would be significantly in excess of anticipated housing demand and potential supply. The upper practical limit to affordable housing delivery is therefore strongly influenced by economic viability and the likely demand for market housing.</u></p> <p><u>4.5.6 Housing demand is defined in PPS3 as '<i>the quantity of housing that households are willing and able to buy or rent</i>'. The SHMA does not provide a definitive indication of future housing demand. Therefore, the council has had regard to household projections and to economic growth forecasts in order to provide some indication of what future housing demand may be.</u></p> <p><u>4.5.7 The most recent household projections (2008-based: DCLG 2010) project an increase of 72,000 households in the city between 2006 and 2026. However, these trend-based projections are based on the assumption that recent high levels of international migration into the city will continue. Whilst it is important to consider the projections they cannot be</u></p>

Change No.	Policy / Paragraph	Proposed Change
		<p><u>considered in isolation. They do not critically evaluate likely future outcomes and do not offer a reasonably realistic projection of household change in the plan period.</u></p> <p><u>4.5.8 Future economic performance is likely to have a key impact on the potential demand for homes. In June 2010 Oxford Economics forecast three potential levels of growth for the city. The central forecast of 2.3% growth per annum was expected to result in employment growth of 21,900 jobs over the plan period. Dwelling based population projections for Bristol (GLA March 2010) indicted that if 30,200 new homes were built in the city up to 2026 there would be an increase of 23,500 economically active people. On this basis, the projected increase in jobs would need to be supported by about 29,000 homes to ensure a reasonable balance between new jobs provided and new homes created.</u></p>
S4.5.2	Existing paragraph 4.5.3	<p><u>4.5.39 The potential supply of housing land in Bristol has been demonstrated through examined with reference to threefive main sources of evidence:</u></p> <ul style="list-style-type: none"> • The Residential Development Survey; • An assessment of the five-year deliverable housing supply; • The Strategic Housing Land Availability Assessment-; • <u>Information on delivery from small sites; and</u> • <u>Assessments of potential capacity for development of land within the Green Belt.</u>
S4.5.2A	New paragraphs 4.5.10 – 4.5.16	<p><u>4.5.10 The Strategic Housing Land Availability assessment indicated a potential supply of 30,000 homes over the plan period. However, following further consideration it was noted that the delivery of certain sites was uncertain. Sites subject to flood risk and proposed redevelopment of pre-cast reinforced concrete dwellings are no longer considered certain by 2026. The potential development of 2,200 homes at Knowle West is also uncertain because it is likely to require funding to support regeneration. Therefore, it is assessed that the level of new homes that can be delivered from identified sites within the built up area is about 26,400.</u></p> <p><u>4.5.11 The Strategic Housing Land Availability Assessment did not consider the potential contribution that developments on small unidentified sites could make over the plan period. Although all small sites cannot practicably be identified, they have made a considerable contribution to housing delivery in the past. The council has cautiously estimated that there are reasonable prospects of around 4,200 homes being delivered from this source from 2012 to 2026.</u></p> <p><u>4.5.12 The potential for using land within the Green Belt for development was also considered during preparation of the Core Strategy. As evidence presented to the Core</u></p>

Change No.	Policy / Paragraph	Proposed Change										
		<p><u>Strategy examination showed, only a small proportion of the Green Belt land in the city has any practicable potential for development. In southwest Bristol the potential capacity was estimated to be a total of 400 homes on three sites. In southeast Bristol the potential capacity was estimated to be in the region of 800 homes to the east of the park and ride site.</u></p> <p><u><i>Conclusions on the appropriate level of homes</i></u></p> <p><u>4.5.13 The council has concluded that economic factors have a major bearing on the level of housing for which it is appropriate to plan. Having regard to the prevailing economic climate in 2010, the Council considers that a forecast level of economic growth of 2.3% GVA per annum is a reasonable assumption about future prospects. On that basis provision of around 29,000 homes should ensure that new jobs created are balanced by sufficient homes.</u></p> <p><u>4.5.14 The evidence of supply shows that the level of identified sites and the contribution from small windfall sites give reasonable prospects that 30,600 homes can be delivered within the built-up area, slightly exceeding the number of homes indicated as achieving a balance with new jobs.</u></p> <p><u>4.5.15 This level of provision could deliver approximately 6,500 affordable homes over the plan period subject to scheme viability.</u></p> <p><u>4.5.16 The determinants of need and demand for homes, and the elements of supply, change over time. If the economy grows more quickly than expected, the planned level of homes could ultimately prove insufficient to ensure that there are enough homes to address employment growth. Therefore, the appropriate level will be reviewed within 5 years of the adoption of the Core Strategy.</u></p>										
S4.5.2B	Existing paragraph 4.5.4	<p>4.5.4 The position at the time of publication of the Core Strategy is summarised in the table below:</p> <p>Table 4.5.1: 2006-26 Housing supply position at 31st March 2009</p> <table><tr><td></td><td>Net dwellings</td></tr><tr><td>Completions 2006-09</td><td>7,037</td></tr><tr><td>Sites with planning permission or agreed subject s.106</td><td>12,510</td></tr><tr><td>Additional supply identified</td><td>10,453</td></tr><tr><td>TOTAL</td><td>30,000</td></tr></table> <p>Sources: BCC Residential Development Survey 2009, SHLAA November 2009.</p>		Net dwellings	Completions 2006-09	7,037	Sites with planning permission or agreed subject s.106	12,510	Additional supply identified	10,453	TOTAL	30,000
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Change No.	Policy / Paragraph	Proposed Change																																
S4.5.3	paragraphs 4.5.5 – 4.5.8																																	
S4.5.5	BCS5	<p>A flexible and responsive supply of deliverable and developable land will be identified to secure the delivery of a minimum provision of 30,000 new homes between 2006 and 2026. The Core Strategy aims to deliver new homes within the built up area to contribute towards accommodating a growing number of people and households in the city. Provision of new homes will be in accordance with the spatial strategy for Bristol set out in this Core Strategy and it is envisaged that 30,600 new homes will be provided in Bristol between 2006 and 2026. Additional provision which accords with the spatial strategy may be appropriate within the plan period.</p> <p><u>The minimum target will be 26,400 homes between 2006 and 2026. The appropriate level of new homes will be reviewed within 5 years of the adoption of the Core Strategy.</u></p>																																
S4.5.6	Table within BCS5	<table><tr><th>Area</th><th>Net additional dwellings 2006-26</th><th>Completions by 1 April 2009</th><th>Planning permissions at 1 April 2009</th></tr><tr><td>South Bristol</td><td>10,000 8,000</td><td>1,883</td><td>3,141</td></tr><tr><td>City Centre</td><td>7,400 7,400</td><td>1,532</td><td>4,818</td></tr><tr><td>Inner East</td><td>2,000</td><td>697</td><td>1,033</td></tr><tr><td>Northern Arc</td><td>3,000</td><td>934</td><td>1,186</td></tr><tr><td>Rest of Bristol</td><td>6,000</td><td>1,991</td><td>2,332</td></tr><tr><td>Citywide – small unidentified sites</td><td>4,200</td><td></td><td></td></tr><tr><td>Total</td><td>30,000</td><td>7,037</td><td>12,510</td></tr></table>	Area	Net additional dwellings 2006-26	Completions by 1 April 2009	Planning permissions at 1 April 2009	South Bristol	10,000 8,000	1,883	3,141	City Centre	7,400 7,400	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	Citywide – small unidentified sites	4,200			Total	30,000	7,037	12,510
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S4.5.7	BCS5	Change not recommended by Inspector																																
S4.5.8	Existing paragraphs 4.5.9 – 4.5.14 and 4.5.16	<p><i>Delete paragraphs</i></p> <p>Council proposed change amended to exclude the deletion of paragraph 4.5.15.</p>																																
S4.5.8A	New paragraph 4.5.17-	<p><u>4.5.17 Whilst the development of 30,600 is reasonably likely, the council is concerned to ensure that specific targets for new homes are not set at a level which could</u></p>																																

Change No.	Policy / Paragraph	Proposed Change
	4.5.20	<p><u>lead to pressure to develop in locations which would conflict with the objectives of the Core Strategy. Therefore, the minimum target is 26,400 which can be delivered from the identified supply. This target figure of 26,400 will be used in calculations of the five year supply of land for housing.</u></p> <p><u>4.5.18 The contribution from small unidentified sites does not form part of the identified supply and minimum target. However, the development of about 4,200 homes from this source from 2012 to 2026 is reasonably likely and will contribute to the delivery of 30,600 homes. The Core Strategy's policies allow for such sites to be developed.</u></p> <p><u>4.5.19 There is potential for around 2,200 homes to arise in regeneration sites at Knowle West. This potential has not been included in the identified supply. However, this level of development would be consistent with the spatial strategy and would represent an acceptable additional level of supply if brought forward during the plan period.</u></p> <p><u>4.5.20 The components of housing supply are summarised in Table 4.5.1.</u></p> <p><u>Table 4.5.1: 2006-26 Components of housing supply</u></p>

Change No.	Policy / Paragraph	Proposed Change
		<p style="text-align: right;"><u>Net dwellings</u></p> <p> <u>Completions 2006-09</u> <u>7,037</u> <u>Sites with planning permission or agreed subject s.106</u> <u>12,510</u> <u>Supply from identified sites</u> <u>6,853</u> <u>Total identified supply</u> <u>26,400</u> <u>Assumed supply from small unidentified sites</u> <u>4,200</u> <u>Total identified supply and small sites assumption</u> <u>30,600</u> <u>Potential additional supply from regeneration sites (Knowle West)</u> <u>2,200</u> <u>Total identified supply, small sites assumption and regeneration sites</u> <u>32,800</u> <u>Sources: BCC Residential Development Survey 2009, SHLAA November 2009.</u> </p>
S4.5.11	Existing paragraph 4.5.17	<p><i>Housing figures</i></p> <p>4.5.17 21 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. <u>Small housing sites are defined as being those of 9 dwellings or fewer.</u></p>
S4.5.12A	Delivery	<p>Additional developable sites for housing (including mixed-use developments) will be allocated in both the proposed Site Allocations & Development Management DPD and Bristol Central Area Action Plan. <u>This will include appropriate sites within the regeneration areas.</u></p> <p><u>Where proposals are in accordance with other policies in the Core Strategy and other development plan documents, the potential contribution of small unidentified housing sites towards the delivery of 30,600 homes will be a relevant consideration in decisions on planning applications. The council will monitor new planning permissions and completions arising from small unidentified sites in order to determine whether the assumptions about development from that source of supply remain accurate.</u></p>
S4.5.12B	Delivery	<p>The approach to policy review, include trigger mechanisms, is set out in the Monitoring and Review section of this strategy. If it is necessary to use contingency sources of supply to maintain delivery, as</p>

Change No.	Policy / Paragraph	Proposed Change
		identified through monitoring, additional sites will be identified in a revised Site Allocations & Development Management DPD and the Bristol Central Area Action Plan. <u>In accordance with a plan, monitor and manage approach to the provision of new homes, the council will continue to monitor the delivery of new homes and examine evolving evidence of need and demand. Within 5 years of the adoption of this Core Strategy it will review the evidence and consider the appropriate response in consultation with other local authorities, the West of England Partnership, the Local Enterprise Partnership and stakeholders. It will examine the latest evidence from population projections, economic forecasts and the progress of economic recovery since the Core Strategy was adopted. The review will consider the extent to which the planned level of new homes continues to be appropriate. If evidence suggests that additional provision of homes will be required the review will consider the appropriate response. The review will take place in the context of any changes to the planning system which have been introduced since the Core Strategy was adopted.</u>
S4.5.13	Target	Provision of a minimum of 26,400 <u>30,000</u> net additional homes between 2006 and 2026.
S4.5.13A	Indicators	The Targets and Indicators section of Policy BCS7 addresses the economic aspects of this policy The Targets and Indicators section of Policy BCS9 addresses the transport aspects of this policy
S4.5.14	Diagram 4.5.1	<i>Replace with updated housing trajectory diagram (see Appendix 1).</i>
S4.5.14A	After Diagram 4.5.1	<u>Note: The trajectory does not include the anticipated contribution of 4,200 homes from small unidentified sites.</u>
Green Belt		
S4.6.1	4.6.3	The Green Belt plays a strategic role in containing the outward expansion of Bristol, providing a green setting for the city and focusing attention upon the regeneration of previously developed land in the urban area. However, as explained in Policy BCS5, the emerging Regional Spatial Strategy envisages the development of urban extensions within Green Belt areas adjacent to the Bristol urban area.
S4.6.2	4.6.4	Change not recommended by Inspector.
S4.6.3	BCS6	Change not recommended by Inspector.
S4.6.4	4.6.7/8	<i>Delete paragraphs</i> Change amended to exclude 4.6.6 so that it is retained.
S4.6.5	Delivery	Change not recommended by Inspector
Centres and Retailing		
S4.7.1	BCS7	<i>Add to middle column:</i>

Change No.	Policy / Paragraph	Proposed Change
	hierarchy (Town Centres)	<u>Two Mile Hill Road (part of Kingswood town centre) *</u>
S4.7.2	BCS7 hierarchy (Bottom Row)	<u>*Kingswood and Staple Hill town centres are is located just outside adjacent to the city's eastern boundary in South Gloucestershire. Two Mile Hill Road in Bristol forms part of that centre.</u> There are also <u>town and local centres at Staple Hill, Gloucester Road North, Filton Avenue, Soundwell Road and Hanham High Street just outside the city's northern and eastern boundaries in South Gloucestershire.</u>
S4.7.3	4.7.9	4.7.9 Bristol's 10 Town Centres cater to a wide catchment in the city <u>(Two Mile Hill Road forms a part of Kingswood town centre which is located in South Gloucestershire).</u> Some are destinations drawing custom from across and beyond the city. Typically they are locations for national chain stores as well as independents. These centres are also characterised by the presence of restaurants, cafés and bars, and a wide range of associated services. Larger community facilities and employment uses are also represented.
S4.7.4	4.7.12	4.7.12 Policy BCS1 provides for a potential new centre in South Bristol. Whether that potential centre which would be likely to performs as a Town or District Centre will depend on the scale and character of development and the relationship with other centres in the vicinity.
<i>Delivering a Thriving Economy</i>		
S4.8.1	BCS8	New employment land will be provided in the period 2006-2026. This will include: <u>Up to 236,000m² of net additional office floorspace:</u> <ul style="list-style-type: none"> • <u>around 150,000m² in the city centre;</u> • <u>50,000around 60,000m² in South Bristol;</u> • <u>36,000around 26,000m² distributed amongst focused on town, district and local centres in the rest of Bristol across the city.</u> <u>Up to 5-10 hectares of additional industrial and warehousing land focused on the major regeneration areas in South Bristol around the existing Norver's Hill and Vale Lane Principal Industrial and Warehousing Areas.</u>
S4.8.1A	BCS8	<u>The city's Principal Industrial and Warehousing Areas will be identified and retained for industrial and warehousing uses. Employment land outside of these areas will be retained where it makes a valuable contribution to the economy and employment opportunities. New employment floorspace suitable for smaller businesses will be encouraged as part of mixed-use development.</u>
S4.8.2	4.8.12	4.8.12 <u>Bristol has a large pipeline stock of office development with around 290,000m² net additional office floorspace identified at the start of the plan period. A</u>

Change No.	Policy / Paragraph	Proposed Change
		<p>further 236,000m² net additional floorspace is proposed in order to deliver the 524,000 m² total potential requirement recommended by the Employment Land Study. 236,000m² of new office floorspace is proposed.</p> <p>The city centre is the main locational focus for this new floorspace as it will build on its existing strengths as the region's office capital and as a sustainable, accessible location for high-density employment. It will also enable the expansion of some of the key economic sectors of professional services, finance and banking, information and communications technology and public administration. To support its regeneration, about 50,000 60,000m² of the total net additional floorspace requirement is focused on South Bristol. The remaining 36,000 26,000m² is proposed for focused on Town, District and Local Centres in the rest of Bristol. The council will keep the supply of office development under review over the plan period, particularly in relation to the economy's recovery from recession.</p>
S4.8.3	4.8.13	<p>The Employment Land Study recommended that 24.5 hectares of additional industrial land should be provided in areas of the city other than Avonmouth in the period to 2006-26. Although the analysis of growth-based forecasts and floorspace in the development pipeline indicated there was adequate land to meet requirements in total, the 24.5 hectare recommendation was intended to meet both pent-up and future demand, provide some flexibility and choice to the industrial market and address the shortage of industrial land available in the areas of the city outside Avonmouth and Severnside.</p>
S4.8.4	4.8.14	<p>The Employment Land Study also indicated that the built-up nature of Bristol and factors such as Green Belt, flood risk and open space means that it is very difficult to identify the ability to allocate new industrial and warehousing land allocations within the city is extremely limited. Due to these challenges, and having regard to its overall objectives, the Core Strategy does not propose to deliver all of the 24.5 hectare recommendation. However, it is considered that up to 10 hectares may be deliverable in South Bristol associated with the major regeneration areas identified on the South Bristol Key Diagram (Diagram 4.1.1) including the area around the existing Nover's Hill / Vale Lane industrial and warehousing area which was highlighted in the Employment Land Study. The potential at those broad locations will be explored through the Site Allocations and Development Management DPD.</p> <p>As the policy indicates, one location has been identified in South Bristol to contribute to meeting the study's recommendation. It is proposed that the area around the existing Nover's Hill and Vale Lane Principal Industrial and Warehousing Areas could accommodate approximately 5-10 hectares of new industrial land. This new location benefits from close proximity to the existing</p>

Change No.	Policy / Paragraph	Proposed Change
		industrial and warehousing areas, good access to the strategic road network and has few adjacent residential constraints.
S4.8.5	4.8.15	In order to deliver the rest of the new industrial land recommended by the study, t <u>The Core Strategy also promotes the retention and renewal of the approximately 1,150 hectares of existing Principal Industrial and Warehousing Areas. Whilst this will not deliver new industrial land, development proposals which intensify and recycle land and premises in identified Principal Industrial and Warehousing Areas are expected to make a contribution to providing new industrial and warehousing floorspace. Redevelopment proposals which intensify and recycle land and premises on these areas is expected to make a contribution to providing new industrial land and floorspace.</u>
S4.8.6	Replacement paragraph 4.8.16	<u>In consultation with neighbouring authorities in the West of England Partnership, the council will keep the supply of industrial and warehousing land and premises under review over the plan period, particularly in relation to the impact of the recession and future economic recovery.</u>
S4.8.7	Existing paragraph 4.8.16	<i>Renumber as 4.8.17</i>
* S4.8.8	Delivery	<u>The Site Allocations & Development Management DPD will identify the Principal Industrial and Warehousing Areas to be retained for industrial and warehousing uses. They will be identified based on the recommendations and criteria based on the findings of the Employment Land Study and other relevant site-specific evidence.</u>
S4.8.9	Target	Provide new employment land and premises: 1) Up to 236,000m ² net additional office floorspace: a) <u>Around 150,000m² net additional office floorspace in the city centre</u> b) <u>Around 50,00060,000m² net additional office floorspace in South Bristol</u> c) <u>Around 36,00026,000m² net additional office floorspace in the city's town, district and local centres in the rest of Bristol</u> d) 2) Up to 10 hectares of A <u>Additional industrial and warehousing land</u>
<i>Green Infrastructure</i>		
S4.9.1	BCS9	Individual green assets should be retained wherever possible and integrated into new development. Where loss of green infrastructure is unavoidable in order to secure appropriate development, <u>will only be acceptable where it is allowed for as part of an adopted Development Plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy.</u> a<u>Appropriate mitigation of the lost green infrastructure assets will be required.</u>

Change No.	Policy / Paragraph	Proposed Change
S4.9.2	BCS9	<p>Some areas of open space may be released, <u>through the development plan process</u>, for appropriate development where:</p> <ul style="list-style-type: none"> • They are no longer important for recreation, leisure and community use, townscape and landscape quality and visual amenity; • Development of all or part of an open space would result in improved urban form or an enhancement to existing open space areas.
<i>Transport and Access Improvements</i>		
S4.10.1A	BCS10	<ul style="list-style-type: none"> • <u>Rail improvements, including the following prioritised schemes: (including the possible reopening of lines and the provision of new stations and Greater Bristol Metro Rail project);</u> <ul style="list-style-type: none"> • <u>The reopening of the Portishead rail line for passenger use.</u> • <u>The Greater Bristol Metro Rail Project.</u> • <u>And the following potential long term schemes:</u> <ul style="list-style-type: none"> • <u>The reintroduction of a local passenger rail service between Avonmouth and Filton (Henbury Loop).</u> • <u>New rail stations, for example at Portway Park & Ride, Ashton Vale and Ashley Hill.</u> • <u>And other passenger rail stations where appropriate.</u>
S4.10.1	BCS10	<p><u>Safeguarding of routes and facilities</u></p> <p>Land required for the implementation of transport proposals will be safeguarded to enable their future provision. Corridors with the potential to serve as future routes for walking, cycling and public transport will also be safeguarded. <u>Appropriate existing transport facilities such as transport depots will be safeguarded where required.</u></p>
S4.10.1B	BCS10	<p><u>Without prejudice to the implementation of the major transport schemes listed above, p</u>Proposals will be determined and schemes will be designed to reflect the following transport user priorities as set out in the Joint Local Transport Plan:</p> <ul style="list-style-type: none"> a) The pedestrian; b) The cyclist; c) Public transport; d) Disabled people; e) Access for commercial vehicles; f) Short stay visitors by car; g) The private car. <p><u>The needs of disabled people will be considered within all of the above headings.</u></p>
S4.10.2	Delivery	Land safeguarded for transport infrastructure proposals will be allocated in the Site Allocations & Development Management DPD <u>and the Central Area Action Plan.</u>

Change No.	Policy / Paragraph	Proposed Change
		<p><u>These DPDs will also safeguard where appropriate existing transport facilities such as rail depots.</u></p> <p><i>(Minor editing of change since previous publication.)</i></p>
S4.10.3	Delivery	<p>Walking and cycling improvements will be delivered through funding from the JLTP, Cycling City and developer contributions.</p> <p><u>Central government spending reviews during 2010 could lead to anticipated funding levels being reduced thereby making the delivery of major transport schemes more challenging.</u></p> <p><u>However, the vast majority of the funding identified to support the schemes within the Joint Local Transport Plan is programmed for spend in the period up to 2019. In a scenario of reduced funding in the shorter term it should still be possible to deliver most if not all of the schemes identified albeit over a longer period of time.</u></p> <p><u>If major schemes are delayed, smaller scale enhancements can be implemented in the shorter term with lower levels of investment to deliver further improvements to the bus network, walking & cycling and smaller scale highway improvements required to support new development.</u></p>
Infrastructure and Developer Contributions		
S4.11.1A	4.11.3	<i>Delete paragraph</i>
S4.11.1	BCS11	<p>Development will provide, or contribute towards the provision of:</p> <ul style="list-style-type: none"> <u>Site-specific Measures to directly mitigate its impacts; either geographically or functionally, which will be secured through the use of planning obligations.</u> <u>Infrastructure, facilities and services required to mitigate its impacts and support growth, which will be secured through a Community Infrastructure Levy (CIL) for Bristol.</u> <p><u>Developer contributions may be sought from residential developments of one or more dwellings, or from other types of development, where such development would add to the overall impact on infrastructure. Planning obligations may be sought from any development, irrespective of size, that has an impact requiring mitigation. Contributions through CIL will be required in accordance with appropriate regulations.</u></p> <p><i>(Minor editing of change since previous publication.)</i></p>
S4.11.2	4.11.4	<p>4.11.4 Without appropriate <u>measures to mitigate impact and investment</u> to enable the provision of infrastructure improvements, the proposed level of development will be</p>

Change No.	Policy / Paragraph	Proposed Change
		neither sustainable nor acceptable. New development will therefore provide or contribute towards the provision of the necessary infrastructure, to enable it to be provided in a timely manner and to support the growth of the city.
S4.11.3	4.11.5	<p>4.11.5 Where significant local <u>infrastructure mitigation</u> is required, the council may pool contributions obligations <u>secured</u> from a number of developments. In <u>addition particular cases</u>, contributions <u>secured through CIL</u> may be pooled with those secured from development across the West of England in order to fund major sub-regional infrastructure.</p> <p><i>(Minor editing of change since previous publication.)</i></p>
S4.11.4	Delivery	<p>The Core Strategy is accompanied by an Infrastructure Delivery Programme, which provides evidence of the infrastructure which that <u>is planned to be delivered required</u> to support planned development. It also explains the mechanisms through which new and improved infrastructure such as schools and health facilities will be secured.</p> <p>The policy will be delivered through the development management process.</p> <p>Contributions will primarily be secured through the use of planning obligations, as set out in Section 106 of the Town and Country Planning Act 1990, and expanded on in ODPM Circular 05/2005 – Planning Obligations. Contributions sought will be in accordance with the guidance contained in this Circular. The approach will be informed by SPD4 ‘Achieving Positive Planning Through the use of Planning Obligations’ (October 2005), which provides the current policy context for securing developer contributions.</p> <p>Government intends to legislate to give local authorities greater powers to apply planning charges in the form of a Community Infrastructure Levy (CIL), to help fund local and strategic infrastructure, alongside negotiated contributions for site-specific matters. Subject to legislation, the council may implement a CIL and would include any formulae and charges relating to it in a CIL charging schedule. Alternatively the council may choose to revise SPD4 to incorporate a wider tariff-based approach.</p> <p><u>Planning obligations will be secured in accordance with legislation and guidance in place at the time, currently Section 106 of the Town and Country Planning Act 1990, Regulations 122 and 123 of the Community Infrastructure Regulations 2010 and ODPM Circular 05/2005. This will be informed by SPD4 “Achieving Positive Planning through the use of Planning Obligations” (October 2005), which provides the local policy context for securing planning obligations. SPD4 will be revised from time to time, including upon the introduction by</u></p>

Change No.	Policy / Paragraph	Proposed Change
		Bristol, of a CIL (Minor editing of change since previous publication.)
Community Infrastructure		
S4.12.1	BCS12	Development should provide or facilitate additional, extended or enhanced community infrastructure where need is identified.
S4.12.2	BCS12	Append: <u>Where community facilities are provided as an integral part of a development they should wherever possible be within adaptable mixed-use buildings.</u>
Sustainable Energy		
S4.14.1	BCS14	Consistent with stage two of the above energy hierarchy, development will be expected to provide sufficient renewable energy generation to reduce carbon dioxide emissions from residual energy use in the buildings by at least 20%. <u>An exception will only be made in the case where a development is appropriate and necessary but where it is demonstrated that meeting the required standard would not be feasible or viable.</u> The use of combined heat and power (CHP), combined cooling, heat and power (CCHP) and district heating will be encouraged. Development will be expected to incorporate, where feasible, low-carbon energy generation and distribution by these means. Within Heat Priority Areas, <u>major</u> development will be expected to incorporate, <u>where feasible</u> , infrastructure for district heating, and will be expected to connect to existing systems where available.
S4.14.1A	BCS14	Append: <u>New development will be expected to demonstrate that the heating and cooling systems have been selected according to the following heat hierarchy:</u> 1. <u>Connection to existing CHP / CCHP distribution networks</u> 2. <u>Site-wide renewable CHP / CCHP</u> 3. <u>Site-wide gas-fired CHP / CCHP</u> 4. <u>Site-wide renewable community heating / cooling</u> 5. <u>Site-wide gas-fired community heating / cooling</u> 6. <u>Individual building renewable heating</u>
S4.14.2	4.14.5 – 4.14.11	Reorder paragraphs as set out in the Schedule of Potential Minor Changes
S4.14.3	4.14.10	New paragraph 4.4.10: <u>4.14.10 If meeting the full requirements of Policy BCS14, either through on-site measures or allowable</u>

Change No.	Policy / Paragraph	Proposed Change
		<u>solutions, would render development unviable, careful consideration will be given as to whether the development is appropriate in other respects and sufficiently necessary to justify an exception to the requirements of Policy BCS14.</u>
S4.14.4	4.14.11	4.14.11 The development of a citywide CHP / CCHP / district heating network will be encouraged. New development in Heat Priority Areas will be expected to maximise opportunities for the development of a district heating network, which may, <u>in the case of major development, include the incorporation within sites and buildings of infrastructure for district heating in areas where a district heating network has yet to be developed (for the purposes of Policy BCS14, major development is defined as development of 10 or more dwellings or development exceeding 1,000m² of other floorspace).</u> Where possible the use of renewable biomass fuels to supply this network and the addition of a variety of heat sources such as the waste heat from industrial plant will be encouraged. Diagram 4.14.1 shows the Heat Priority Areas. The Heat Priority Areas are based on those recommended by the Bristol Citywide Sustainable Energy Study, but have regard to changes in the spatial strategy for Bristol since the study's publication in June 2009.
S4.14.5	New paragraph 4.14.12 replacing existing 4.14.8	<u>4.14.12 In selecting the heating and cooling systems in accordance with the heat hierarchy, the lowest carbon heating / cooling solution feasible for the development will be achieved. Energy savings made by the use of CHP / CCHP will contribute to Policy BCS14's requirement to minimise energy requirements, while the use of renewable energy sources to power CHP / CCHP or community heating will contribute to Policy BCS14's requirement to reduce residual CO₂ emissions by 20%.</u>
S4.14.6	Existing paragraph 4.14.9	Where a new heating or cooling distribution network is proposed, consideration should be given to extending this <u>it should be designed to be easily extendable to serve neighbouring developments.</u>
S4.14.7	Indicators	<i>Append:</i> <u>No. of residential properties in major development supplied by district heating</u> <u>Non-residential floorspace in major development supplied by district heating</u> <u>No. of residential properties in major development supplied by renewable CHP or renewable community heating</u> <u>Non-residential floorspace in major development supplied by renewable CHP or renewable community heating</u>
<i>Flood Risk and Water Management</i>		
S4.16.1	4.16.4	4.16.4 The Site Allocations & Development Management DPD will follow a sequential approach to the allocation of sites for development, in accordance with PPS25 'Development and Flood Risk'. Where possible, new

Change No.	Policy / Paragraph	Proposed Change
		<p>development will be proposed in areas with a low risk of flooding. However, reasonably available sites with a low risk of flooding are unlikely to offer sufficient capacity to meet requirements for growth in Bristol. Consequently some sites will have to be allocated in areas with a sequentially greater risk of flooding. In the selection of sites for development in areas at risk of flooding, the exception test outlined in PPS25 will be carried out to demonstrate the need for further development in those locations.</p> <p><u>4.16.4 New development in Bristol will follow the sequential approach to flood risk, as set out in PPS25 'Development and Flood Risk'. In accordance with the Sequential Test, new development will be directed where possible to the areas with the lowest risk of flooding (Flood Zone 1). Where it does become necessary to consider development on land with a greater risk of flooding, development will, where required by PPS25, also be expected pass the Exception Test, which assesses the development against other considerations such as its broader sustainability benefits, the use of previously developed land and the potential to make the development safe through mitigation.</u></p> <p><u>4.16.4A In Bristol, the Sequential and Exception Tests will be undertaken on the basis of the climate change flood zones set out in the Strategic Flood Risk Assessment. In areas of the city not covered by the climate change flood zones as set out in the Strategic Flood Risk Assessment (SFRA), it can be assumed that Flood Zone 2 as existing as set out in the SFRA becomes Flood Zone 3 with climate change, unless there is credible, more detailed and up to date evidence, such as in a site specific FRA.</u></p> <p><u>4.16.4B The council's Flood Risk Sequential Test Position Paper (October 2010) sets out how the level of growth set out in the Core Strategy is considered to pass the Sequential Test, and will therefore not prejudice the compliance with the Sequential Test of the Site Allocations & Development Management DPD or Bristol Central Area Action Plan DPD. In short, however:</u></p> <ul style="list-style-type: none"> <u>• Since there is sufficient capacity in Flood Zone 1, no development of sites lying in Flood Zone 3 as existing or with climate change will be required in order to meet the Core Strategy target of 26,400 homes.</u> <u>• It is not proposed to designate greenfield sites for industrial and warehousing use where that land is at risk of flooding and does not already benefit from planning permission.</u> <u>• Some office development may be necessary on land at risk of flooding in the city centre in order</u>

Change No.	Policy / Paragraph	Proposed Change
		<p><u>to meet identified employment development needs, given that there are insufficient sites on Flood Zone 1 either in the city centre or elsewhere in the city that would accord with the approach to locating main town centre uses as set out in PPS4 'Planning for Sustainable Economic Growth' and would therefore be considered "reasonably available" for the purpose of the Sequential Test as set out in PPS25.</u></p> <p><i>(Minor editing of change since previous publication.)</i></p>
S4.16.2	4.16.5	<p>4.16.5 Development proposed on sites not covered by the Site Allocations & Development Management DPD <u>or Bristol Central Area Action Plan DPD</u> that are at risk of flooding will also need to pass the sequential and exception tests <u>Sequential Test</u> and, where required, the <u>Exception Test</u> as set out in PPS25, other than in the case of changes of use and development defined by PPS25 as "minor development". The s<u>Sequential</u> t<u>Test</u> should be undertaken as part of the application for planning permission. Further guidance on the s<u>Sequential</u> and e<u>Exception</u> t<u>Tests</u> is available in PPS25, the PPS25 Practice Guide and the Environment Agency's standing advice.</p>
<i>Affordable Housing Provision</i>		
S4.17.1	BCS17	<p><u>Affordable housing will be required in residential developments of 15 dwellings or more. The following percentage targets will be sought through negotiation:</u></p> <ul style="list-style-type: none"> • 40% in North West, Inner West and Inner East Bristol; • 30% in all other locations; <p><u>In residential developments below 15 dwellings the scheme should provide an appropriate financial contribution towards the provision of affordable housing may be sought (either as a financial contribution or as on site provision) in accordance with any relevant policy in the Site Allocations and Development Management Development Plan Document.</u></p>
S4.17.2	BCS17	<p><u>All units provided should remain at an affordable price for future eligible households or, if this restriction is lifted, for the subsidy to be recycled for alternative affordable housing provision.</u></p>
S4.17.2A	BCS17	<p><u>In exceptional circumstances wWhere scheme viability may be affected, developers will be expected to provide full development appraisals to demonstrate an alternative affordable housing provision.</u></p>

Change No.	Policy / Paragraph	Proposed Change
S4.17.3	4.17.7	In residential developments below the stated thresholds, with the exception of schemes delivered wholly from public subsidy, the scheme will provide an appropriate financial contribution. Such a contribution will build a fund to assist in the delivery of additional affordable housing. The council is undertaking further viability work to determine whether financial contributions can be sought from residential developments below 15 units. The council is proposing to bring forward a Development Management policy as part of the Site Allocations and Development Management DPD. The policy will set out the minimum site size and the range of contributions to be sought.
S4.17.4	4.17.8	4.17.8 The council will expect the affordable housing to be delivered without public subsidy and provided on site. Where the council's full-affordable housing requirement target cannot be provided...
S4.17.5	4.17.8	...the developer will need to demonstrate that, due to exceptional circumstances, the scheme will not be financially viable unless the council accepts a lower or different affordable housing contribution. In such cases the council will expect a full development appraisal to be submitted for independent validation.
S4.17.6	Delivery	The quantity, tenure balance and type/size mix of the affordable housing will be agreed with the council's Affordable Housing Development Team through the development management process. In exceptional circumstances, w Where the developer has demonstrated the scheme to be unviable and this has been independently validated, the council may consider the use of alternative mechanisms to achieve the full affordable housing requirement.
<i>Housing Type</i>		
S4.18.1	BCS18	To achieve an <u>The appropriate tenure, type and size mix of the development will be informed by should aim to:</u> <ul style="list-style-type: none"> <u>Address affordable Local housing need and housing demand;</u> <u>Existing profile- Contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists;</u> <u>Local demographic context Respond to the requirements of a changing population;</u> <u>Site issues and Employ imaginative design considerations solutions.</u>
S4.18.2	4.18.7	The policy criteria will help to achieve The provision of an appropriate mix of housing will depend on a number of factors. in all new residential development. Schemes will be expected to take account of housing These include real-need and active demand on the ground, to have regard to the composition of the local housing stock and, local demographic changes patterns and to respond to

Change No.	Policy / Paragraph	Proposed Change
		site related issues and design considerations, through imaginative design solutions. An understanding of these factors will help determine the kind of mix that can be achieved in any one development. A number of evidence sources including the Strategic Housing Market Assessment together with supplementary Neighbourhood Housing Studies can will be used to inform this judgement the approach.
<i>Gypsies and Travellers and Travelling Showpeople</i>		
S4.19.1	BCS19	Suitable sites will be identified to meet the established need for Gypsies & Travellers and Travelling Showpeople for the period to 2011.
S4.19.2	BCS19	The following considerations will be taken into account in the determination of locations for Gypsy & Traveller and Travelling Showpeople sites: <ul style="list-style-type: none"> • Proximity of the site to local services and facilities. • Access to the primary route network and to public transport. • Safe pedestrian, cycle and vehicular access onto the site. • Adequate provision for parking, turning and servicing. • Adequate provision for storage and maintenance where needed for Travelling Showpeople. • Inclusion of suitable landscaping treatment. • Impact on the character and appearance of the surrounding area. • <u>The acceptability of living conditions for future occupiers of the site.</u>
S4.9.3	BCS19	<i>Append:</i> <u>Suitable sites will be identified to meet the established need for Gypsies & Travellers and Travelling Showpeople for the period to 2011. Needs beyond 2011 have not been assessed but the considerations set out in this policy will also apply to any sites proposed to meet assessed needs arising after 2011.</u>
<i>Quality Urban Design</i>		
S4.21.1	BCS21	To demonstrate the delivery of high quality urban design, <u>major development proposals with a residential component</u> should meet standards set out under established national methodologies such as be assessed against 'Building For Life' (or equivalent methodology). Minimum <u>As a guide, development should aim to achieve the standards against Building for Life</u> are set out in the table below.
S4.21.2	4.21.15	<u>Building for Life is a nationally recognised methodology for assessing the design quality of residential development, led by CABI and the Home Builders' Federation, using 20 criteria. Whilst the policy does not imply conformity with specified standards is the sole</u>

Change No.	Policy / Paragraph	Proposed Change
		<u>guide to a decision, the Building for Life methodology offers a systematic way of demonstrating that the overall objective and criteria in Policy BCS21 have been addressed. Therefore, proposals for major development with a residential component should demonstrate, through the Design and Access Statement, how the development would deliver high quality design, with reference to the Building for Life assessment criteria. This statement will be reviewed by a CABE-accredited assessor who will prepare a formal report for the consideration of the decision maker. If Building for Life is discontinued in the future, the Council will identify an equivalent alternative methodology to guide decisions. Minor developments should also aim to achieve a similar standard of design.</u>
Monitoring and Review Chapter		
S5.1	5.5	<i>Delete "Housing delivery contingencies" heading, paragraph 5.5 and table 5.1.</i>
Key Diagram		
S11.1	Diagram and Legend	<p><i>"Existing passenger rail network" - Darken the route shown on the key diagram and the symbol in the accompanying legend so it is clearer.</i></p> <p><i>Delete "Currently no passenger service rail line" text from the legend but leave the route shown on the Key Diagram to the west of the city (Portishead rail line). Replace text with "Reopening of the Portishead rail line for passenger use".</i></p> <p><i>Change the colour of the route shown as "Currently no passenger service rail line" to the north of the city on the key diagram and the legend and replace the text with "Reintroduction of passenger rail services on the Henbury Loop (longer term aspiration)".</i></p> <p><i>Delete the "possible new stations" shown on the route "Reintroduction of passenger rail services on the Henbury Loop (longer term aspiration)". These potential locations for new stations at Henbury and Filton North are located outside of the BCC administrative area.</i></p> <p><i>Insert "The Greater Bristol Metro Rail Project" on the legend and illustrate the routes on the key diagram.</i></p> <p><i>Remove 'Urban Extension: Areas of search for urban extensions outside the city boundary' from Legend and Icons from diagram</i></p> <p><i>(See Appendix 1)</i></p> <p>Inspector's Note: The previously proposed "Remove 'Contingency for future development in southeast Bristol – Up to 1500 homes' from Legend and Icon from diagram" does not form part of the recommended proposed changes and should be retained on the Diagram, subject to an Inspector change in Appendix 3.</p>

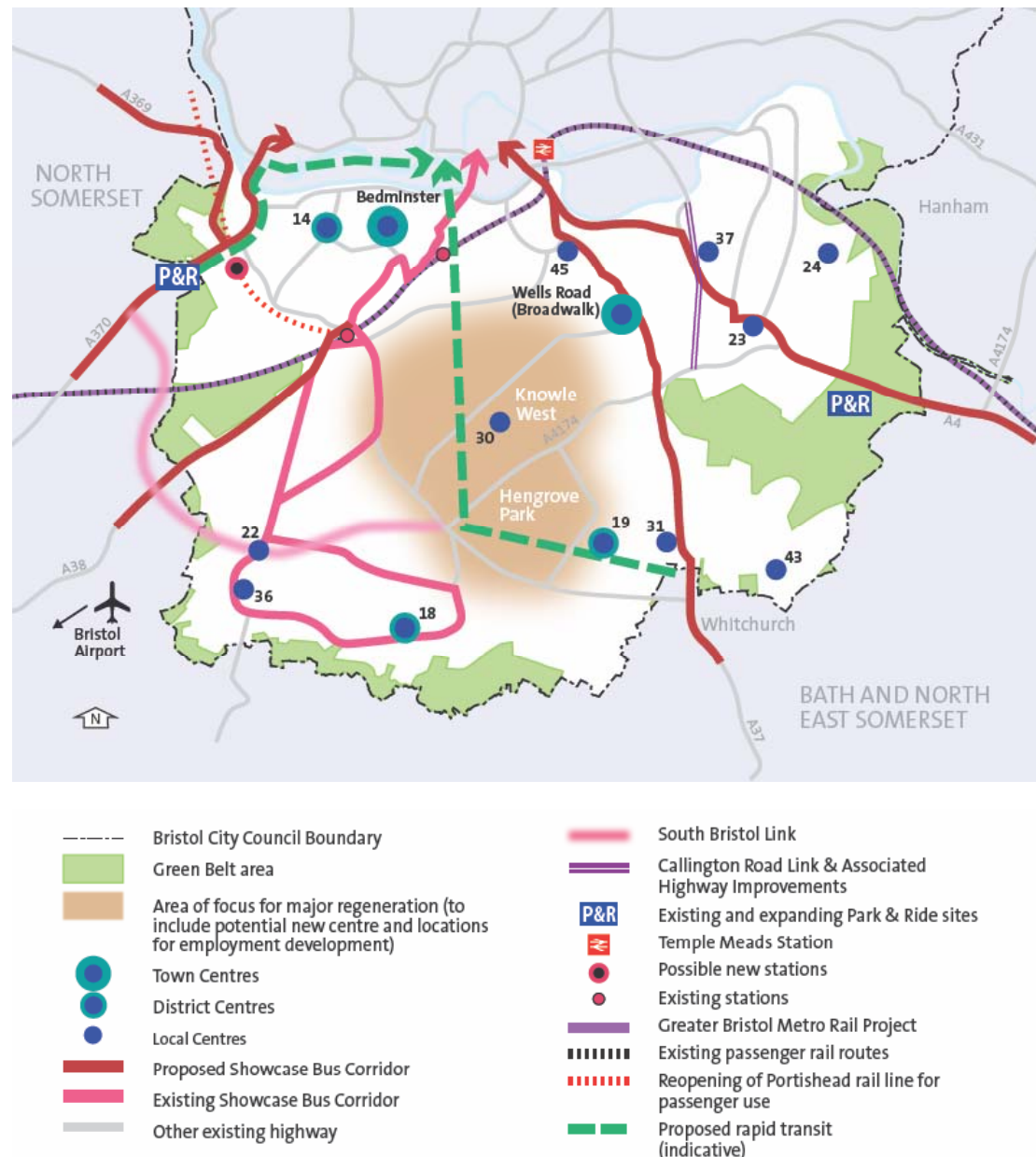
Change No.	Policy / Paragraph	Proposed Change
Changes to Other Parts of the Core Strategy		
* S12.1	New appendix	<i>Add new appendix</i> <u>Appendix E: General extent of coal resource areas and of legacy areas</u> <i>Add two maps showing general extent of coal resource areas and of legacy areas (see Appendix 1)</i>

Appendix 1: New and Revised Diagrams

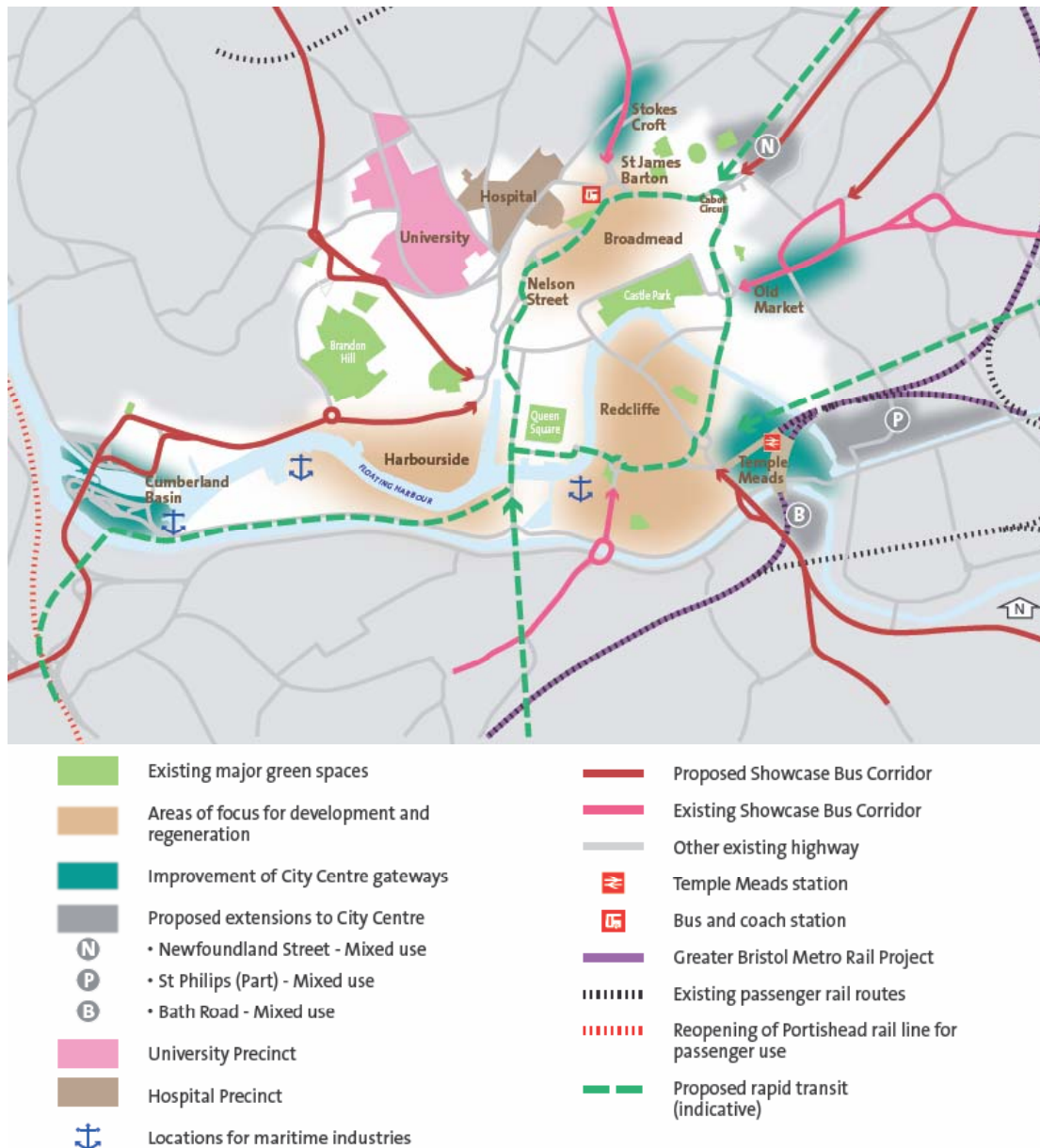
The following revised diagrams accompany specific changes in the schedules as numbered below.

(Inspector's Note: In change S4.1.4 and S11.1, The Legend 'Contingency for future development in southeast Bristol – Up to 1500 homes' and the related Icon on the diagrams in the submitted Core Strategy should be retained on these amended Diagrams, subject to the Inspector change in Appendix 3.)

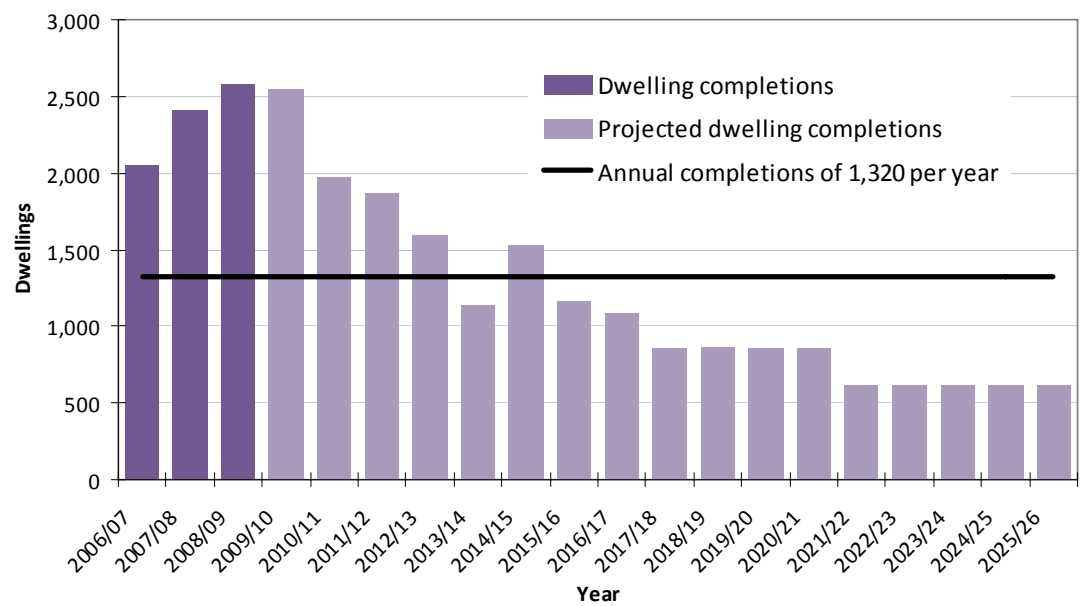
Change S4.1.4



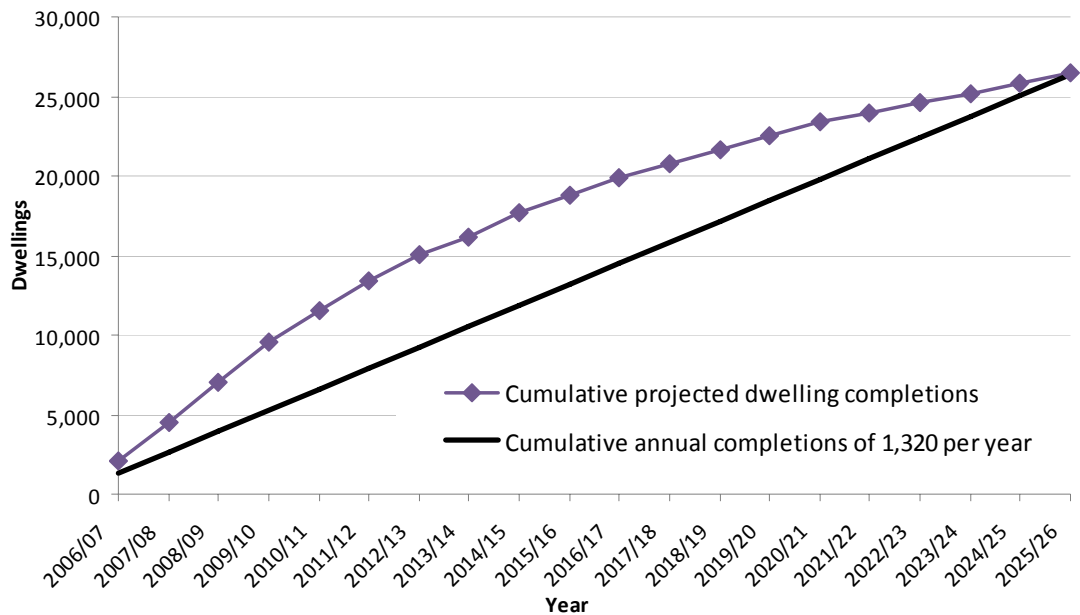
Change S4.2.6



Bristol housing trajectory 2006 to 2026

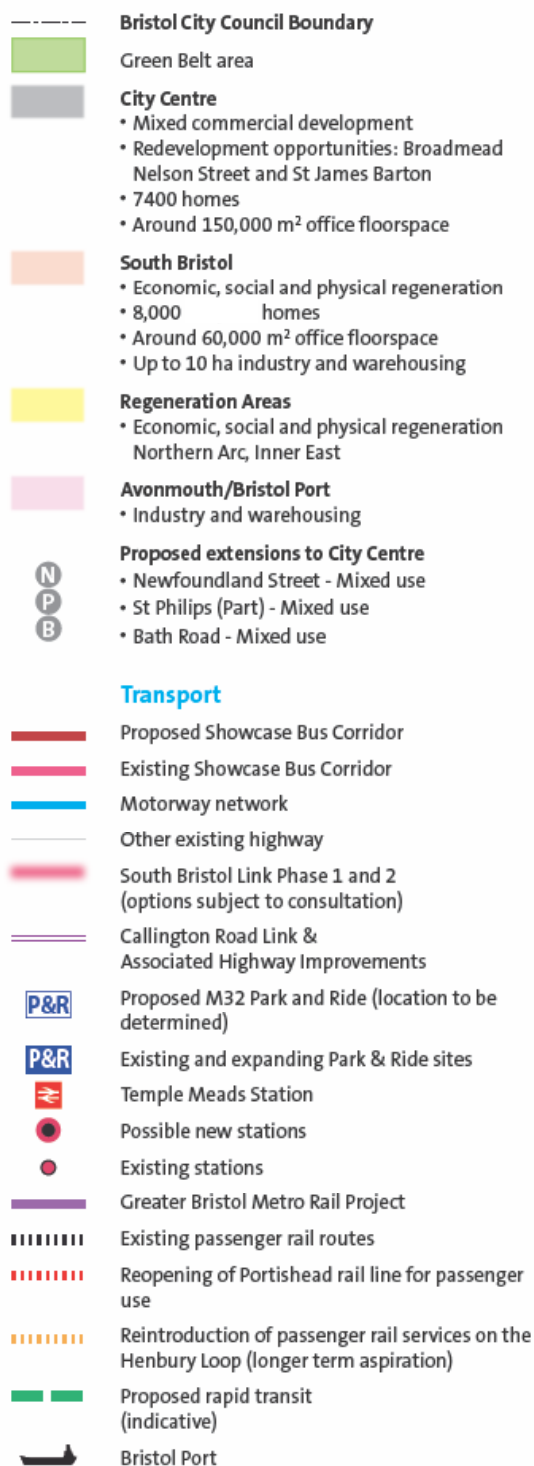


Bristol cumulative housing provision 2006 to 2026



Change S11.1

Key Diagram



Town Centres

- 1 Bedminster
- 2 Clifton
- 3 Fishponds
- 4 Gloucester road
- 5 Henleaze
- 6 Shirehampton
- 7 St George (Church Road)
- 7a Two Mile Hill Road (part of Kingswood town centre)
- 8 Wells Road (Broadwalk)
- 9 Westbury-on-Trym
- 10 Whiteladies Road



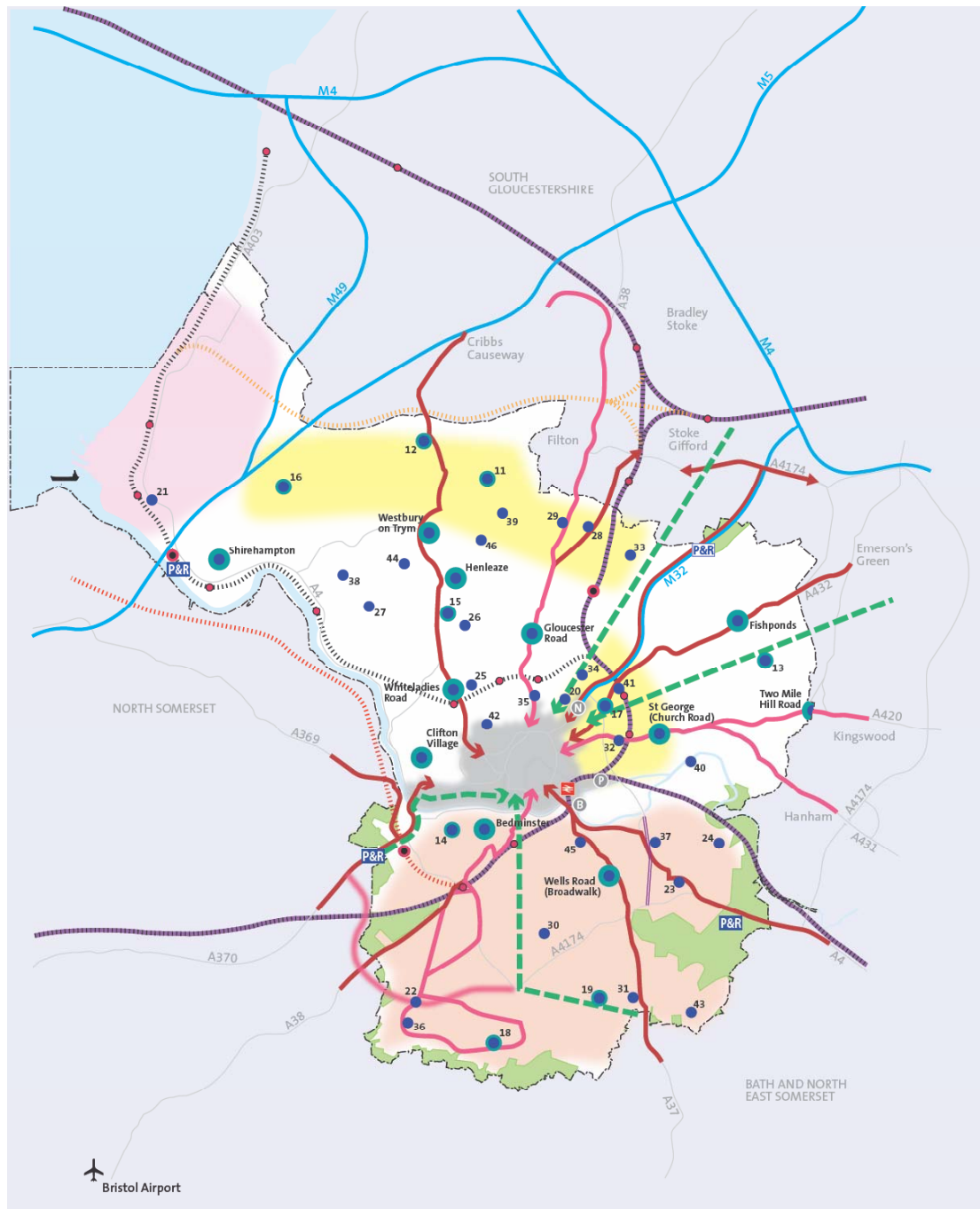
District Centres

- 11 Arneside Road (Southmead)
- 12 Crow Lane (Henbury)
- 13 Lodge Causeway
- 14 North Street (Southville)
- 15 North View (Westbury Park)
- 16 Ridingleaze (Lawrence Weston)
- 17 Stapleton Road
- 18 Symes (Hartcliffe)
- 19 Whitchurch (Oatlands Avenue)



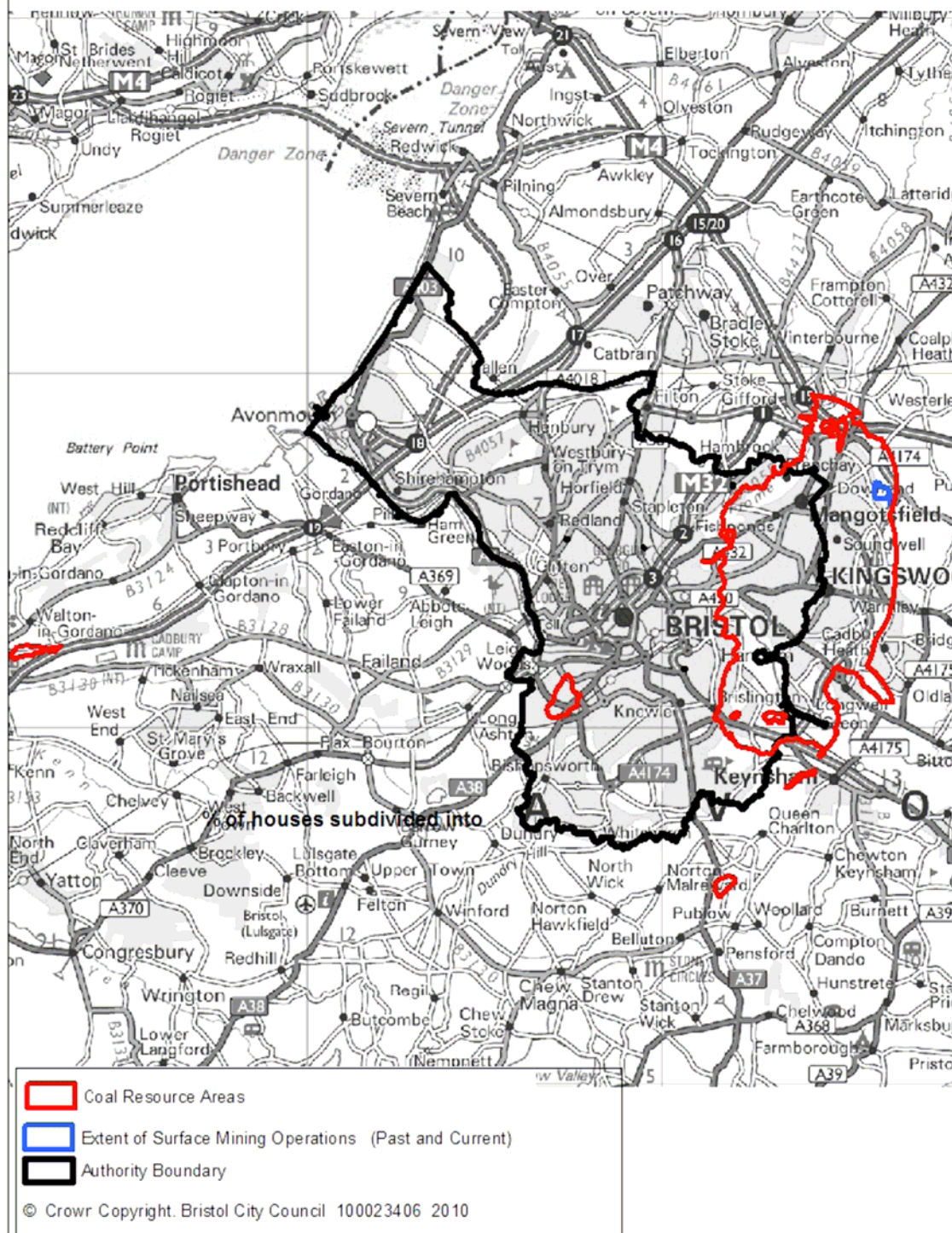
Local Centres

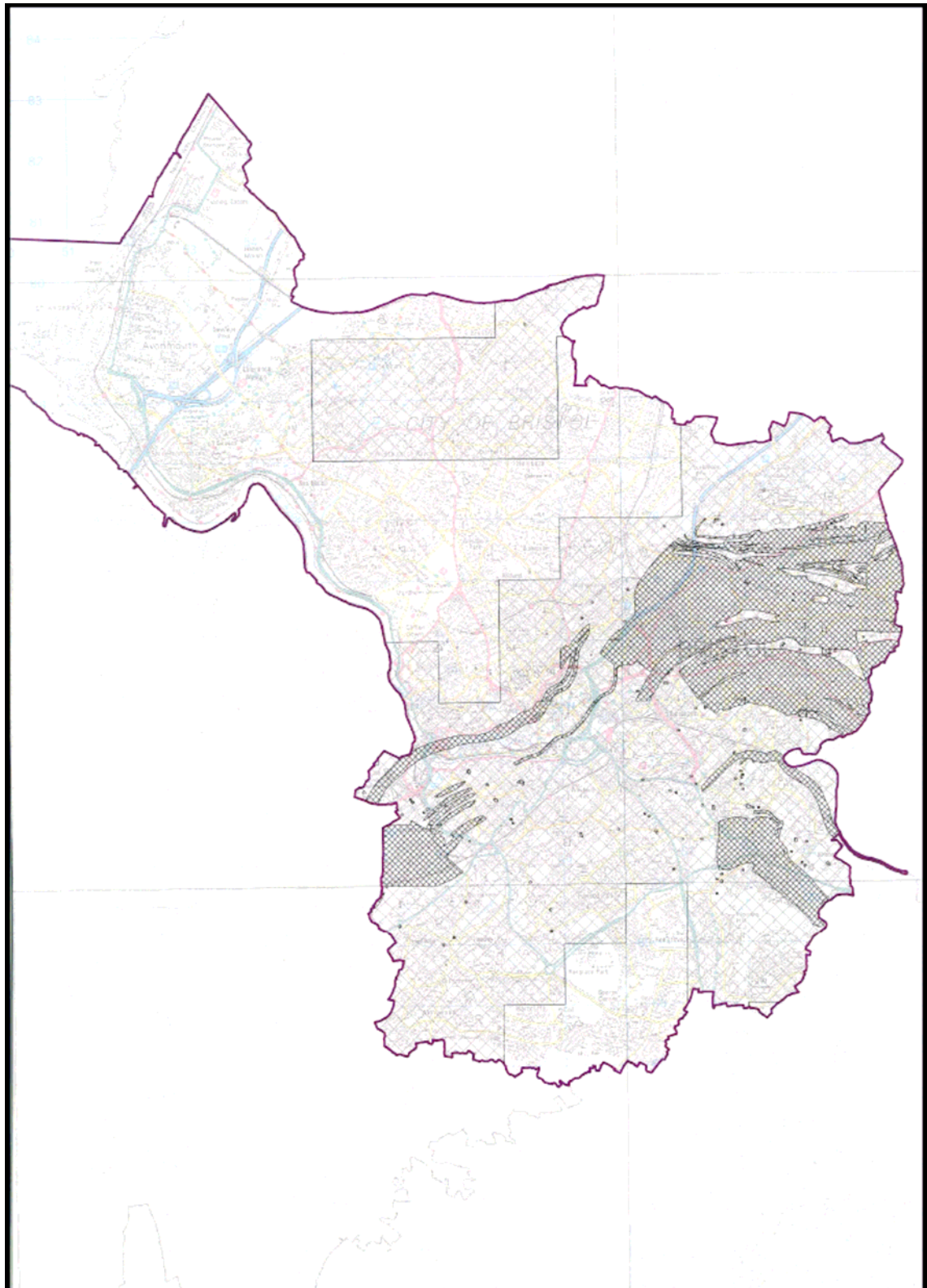
- 20 Ashley Road/Grosvenor Road
- 21 Avonmouth Village
- 22 Bishopsworth
- 23 Brislington
- 24 Broomhill Road/Fermaine Avenue
- 25 Chandos Road
- 26 Coldharbour Road
- 27 Druid Hill Stoke Bishop
- 28 Filton Avenue
- 29 Filton Road
- 30 Filwood Broadway
- 31 Gilda Parade
- 32 Lawrence Hill
- 33 Lockleaze (Gainsborough Square)
- 34 Mina Road
- 35 Picton Street
- 36 Queens Road (Withywood)
- 37 Sandy Park Road
- 38 Shirehampton Road
- 39 Southmead Road
- 40 St Anne's Road
- 41 St Marks Road
- 42 St Michaels Hill
- 43 Stockwood
- 44 Stoke Lane
- 45 Totterdown
- 46 Wellington Hill West/Southmead Road



Change S12.1

Surface Coal Resource Data
(Source: The Coal Authority - May 2010)





Appendix B

The Council's Minor Changes.

Text to be deleted is shown with ~~striketrough~~.

Text to be added is shown underlined.

The modified text outlined in this schedule takes the changes proposed in the Schedule of Minor Post-Publication Changes (March 2010) (CDE37) as read where those changes have been accepted as "minor" by the Inspector.

Change No.	Policy / Paragraph	Proposed Change
Introduction Chapter		
M1.1	1.2	1.2 The BDF will consider how the city will develop over the next 15 to 20 years. The BDF documents will form part of the statutory Development Plan for the city. along with the Regional Spatial Strategy for the South West. The Development Plan is used to help direct a range of implementation plans and decisions on planning applications. <i>Minor editing of previously published change.</i>
Issues and Challenges Chapter		
M2.1	2.6	2.6 Overall recorded crime levels have been falling in recent years and, as of March 2009, the crime rate in Bristol was at a ten year low. Bristol contains some areas of socioeconomic deprivation which are amongst some of the most deprived areas in the country yet are adjacent to some of the least deprived. <u>Overall life expectancy in the city is lower than the England average and the difference between the most and least deprived areas in the city is nearly nine years.</u> Levels of educational attainment in Bristol's schools are generally lower than comparable cities. However, recent results show continuing sustained improvement on the majority of indicators across all key stages.
M2.2	Subheading before 2.21	National and Regional Context
M2.3	2.22-2.23	<i>Delete paragraphs.</i>
Spatial Vision and Objectives Chapter		
** M3.1A	A city of sustainable travel	<ul style="list-style-type: none"> Cycle and pedestrian facilities will be developed to contribute to reducing car dependence <u>and encouraging active lifestyles.</u>
** M3.2	Maintaining and improving a network of green infrastructure	<ul style="list-style-type: none"> Green infrastructure will be built into new developments across the city, <u>providing new opportunities for physical activity, sports, active play and food growing.</u>

Change No.	Policy / Paragraph	Proposed Change
Delivery Strategy Chapter		
<i>South Bristol</i>		
M4.1.1A	Delivery	The council has commissioned an assessment of the need for a new centre in South Bristol and potential locations. There are a number of factors which could influence the delivery of such a centre including projected retail expenditure, the impact on other centres and the nature of development in <u>neighbouring areas</u> any urban extensions which might be developed adjacent to the city . If land needs to be allocated for the development of a new centre this will be undertaken through the Site Allocations & Development Management DPD.
<i>Bristol City Centre</i>		
M4.2.1	4.2.6	4.2.6 The centre of Bristol is of particular importance to the city's economy with over 100,000 people employed in a diverse range of occupations. As the region's office capital it is the location for the country's largest employment base in banking, insurance and professional services outside London. The Temple Quay area adjacent to Temple Meads train station is a particularly successful office location containing a number of headquarters buildings. The city centre office market shows signs of continuing strength. — as of April 2009 there was a healthy pipeline supply of approximately 310,000m² of new office floorspace with planning permission. The Employment Land Study confirms that there will be a need and demand for new office floorspace over the period of the Core Strategy.
M4.2.2	Delivery	The proposed AAP will provide the framework for delivering new development and growth in the area, including identifying the new city centre boundary. The AAP will set out a detailed policy framework for the central area and will allocate sites for development and protection. It will be informed by new evidence sources including an urban context analysis, <u>and a revised retail study and further work on strategic flood risk and mitigation.</u> <u>The area covered by the Central Area Action Plan is shown for information on Diagram 4.2.2. The diagram only shows the geographical area to be covered by the area action plan and is not a boundary within which any specific development plan policies apply.</u>
M4.2.4	New diagram 4.2.2	<i>Add diagram showing area covered by Central Area Action Plan boundary, entitled "Area covered by the Bristol Central Area Action Plan". (See Appendix 1)</i>
<i>Avonmouth and Bristol Port</i>		
M4.4.1	4.4.4	4.4.4 Bristol Port (which includes operations at Royal Portbury on the southwest bank of the River Avon in North Somerset) has seen considerable recent growth. Between 1991 and 2007 the throughput of goods increased from 4m to 12m tonnes. It supports

Change No.	Policy / Paragraph	Proposed Change
		approximately 7,500 jobs in the sub-regional economy through port-related industries. The Bristol Port Company also has plans permission to expand the port through the construction of a deep sea container terminal at Avonmouth which could create an additional 1,500 jobs. The council supports this proposal in principle.
M4.4.4	4.4.12	4.4.12 The effect of this policy is to make Avonmouth a continuing focus for development and renewal of existing established employment areas for industry and warehousing. Having regard to the environmental and other physical constraints identified and the Core Strategy's approach to the provision of new employment land as set out in Policy BCS8, the policy does not promote new allocations for employment development on greenfield land.
M4.4.6	Indicator	Total amount of employment floorspace (m ²) and land (Ha) in the pipeline in Avonmouth (Use Classes B1(a), B1(b), B1(c), B2, B8) (AMR Local Indicator 9) Total amount of additional employment floorspace (m ²) and land (Ha) completed in Avonmouth (Use Classes B1(a), B1(b), B1(c), B2, B8) (AMR Local Indicator 8)
Green Belt		
M4.6.1	4.6.1	<i>Previously published change removed from schedule by Inspector.</i>
M4.6.2	Delivery	The Site Allocations & Development Management DPD will identify the precise boundaries of the Green Belt, which will be shown on the Proposals Map. Any changes to Green Belt boundaries which might result from urban extension development will be made as part of a review of the Site Allocations & Development Management DPD.
Centres and Retailing		
M4.7.1A	BCS7	<u>Retail Sshop</u> uses will predominate in the designated primary shopping areas of the City and Town Centres, supported by a wider range of appropriate uses in the other parts of these centres. The role of District and Local Centres in meeting the day-to-day shopping needs of their catchments will be maintained. Developments in all centres should include provision for a mix of units including opportunities for small shops and independent traders.
M4.7.1	BCS7 hierarchy (City Centre)	<i>Add new heading "City Centre" of equivalent status to "Town Centres", "District Centres" etc.</i> <i>Convert existing heading to boldface text similar to the other centres in the table.</i> <i>Leave remainder of row as existing.</i>
M4.7.5	4.7.15	4.7.15 Retail Sshop uses referred to in this policy refer to those in Class A1 of the Use Classes Order. Retail uses include those falling within Classes A1 to A5. Active ground floor uses are generally those falling within Use

Change No.	Policy / Paragraph	Proposed Change
		Classes A1 to A5 but can also include other town centre uses which are visited by large numbers of people. Residential uses and offices (Use Class B1) would not normally be considered as active uses for ground floors in this context.
<i>Delivering a Thriving Economy</i>		
M4.8.1	4.8.8	The Employment Land Study has identified key economic sectors with potential to grow <u>in Bristol</u> . These are: aerospace and advanced engineering; banking and insurance; professional services; creative industries; environmental technologies; information and communications technology; public administration; and wholesale and distribution. An important issue therefore is to provide for their spatial requirements.
<i>Green Infrastructure</i>		
M4.9.2	BCS9	<u>Where development is proposed on land within would have an impact on the Bristol Wildlife Network it should ensure that the integrity of the network is maintained or strengthened.</u>
M4.9.3	4.9.9	4.9.9 As explained in PPS9 'Biodiversity and Geological Conservation' the level of protection afforded to biological and geological conservation sites is dependent on whether they are of international, national or local importance, those of international and national importance being afforded more protection than those of local importance. In Bristol, Sites of Nature Conservation Interest are designated through the Development Plan process as local sites. These are accompanied by Local Nature Reserves and Regionally Important Geological Sites which are local sites designated through separate processes. <u>Land with a function as a corridor for wildlife, along with the locally designated Sites of Nature Conservation Interest, form the Bristol Wildlife Network. The Network either links the designated local sites to each other or to the wider countryside.</u>
M4.9.4	Delivery	The Site Allocations & Development Management DPD will include supporting policies setting out the detailed approach to green infrastructure assets. <u>This will include standards to determine the appropriate provision of open space and other green infrastructure assets.</u>
M4.9.4A	Delivery	<i>Green infrastructure and development on open space</i> The Site Allocations & Development Management DPD <u>and Bristol Central Area Action Plan</u> will designate important open spaces and sites of nature conservation interest. Where it is proposed to develop publicly accessible open space recognised by the council's Parks and Green Space Strategy, these will be identified in Area Green Space Plans being prepared by the council in consultation with local communities. The Site Allocations & Development Management DPD <u>and Bristol Central Area Action Plan</u> will designate these sites for development where they are of

Change No.	Policy / Paragraph	Proposed Change
		<p>sufficient size to be shown on the Proposals Map.</p> <p>The Site Allocations & Development Management DPD and Bristol Central Area Action Plan will also identify other green space areas for potential development where they are not important for recreation, leisure and community use, townscape and landscape quality and visual amenity and are required to meet identified development needs or improve the urban form. <u>These Site Allocations & Development Management DPDs will be the subject of extensive community involvement.</u></p>
M4.9.5	Delivery	<p>The Parks and Green Spaces Strategy sets out the appropriate standards for open space provision. Other strategies produced by the council will set out standards and approaches to other forms of green infrastructure. <u>These standards will be embodied in the Site Allocations and Development Management DPD.</u></p> <p><u>BCS21 and its associated development policies in the Site Allocations and Development Management DPD and Bristol Central Area Action Plan provide the framework for indicating how development should respond to the city's landscape structure and topography.</u></p>
** M4.9.5A	Delivery	<p><i>Nature Conservation</i></p> <p>The Site Allocations & Development Management DPD and Bristol Central Area Action Plan will designate local sites...</p>
M4.9.6	Delivery	<p><u>At the time of the adoption of the Site Allocations and Development Management DPD the Bristol Wildlife Network will be identified on publicly available maps accompanied by corridor profiles. and Together they will be used when considering the impact of development on wildlife networks. to guide consideration of impacts on the Wildlife Network (Local Plan Policy NE6 will continued to be saved until adoption of the DPD).</u></p>
<i>Transport and Access Improvements</i>		
M4.10.1	4.10.5	4.10.5 National and regional transport policy documents emphasise the need to promote sustainable transport choices in land use decisions, promote accessibility of sites to essential facilities by public transport, walking and cycling, and to reduce the need to travel, especially by car.
M4.10.1A	4.10.7	4.10.7- The Greater Bristol Strategic Transport Study examined the strategic transport improvements needed within the Greater Bristol sub-region for the period up to 2031 to inform the emerging South West Regional Spatial Strategy . This work modelled the approximate level of development set out in this Core Strategy. The recommendations from the study have informed the JLTP and the Core Strategy's transport policy.
M4.10.4	4.10.9	<ul style="list-style-type: none"> • Rail Improvements: Continued investment in local rail services and development of major rail schemes such as the Portishead Passenger Rail project and the

Change No.	Policy / Paragraph	Proposed Change
		<u>Greater Bristol Metro Rail project</u> . The Metro project seeks to deliver an enhanced local rail network of half-hourly cross-city services into and across the West of England (Yate to Weston-super-Mare and Cardiff to Westbury via Bath and Bristol corridors). It will improve reliability of services and provide additional capacity through new infrastructure. The proposed electrification of the Great Western Mainline between London and Bristol by 2016 (and onto Swansea by 2017) will bring faster journey times, greater capacity and a more efficient network.
M4.10.5	Delivery	<p>The following schemes listed within Policy BCS10 have been identified as priorities for funding through the Regional Funding Advice process:</p> <ul style="list-style-type: none"> • Rapid transit Ashton Vale to City Centre • North Fringe to Hengrove Package (including rapid transit, M32 Park and Ride and other highway improvements) • South Bristol Link • <u>Greater Bristol Metro Rail Project</u> • Portishead Rail Corridor • Callington Road Link • Rapid transit City Centre to Emersons Green
<i>Community Infrastructure</i>		
M4.12.1	Title	<u>Community Infrastructure Facilities</u>
M4.12.1A	4.12.2	<p>4.12.2 The term Community infrastructure facilities is wide-ranging and can encompass a wide variety of services and facilities. It may include community centres and childcare facilities, cultural centres and venues, places of worship, education establishments and training centres, health and social care facilities, sport and recreation facilities and civic and administrative facilities. It may also include other uses whose primary function is commercial but perform a social or community role i.e. sport, recreational and leisure facilities including local pubs.</p>
M4.12.2	4.12.4	<p>4.12.4 Development has an important role to play in supporting communities through the provision or protection of necessary community infrastructure facilities. Development itself places pressure on existing community services and facilities and often creates additional need for new or enhanced infrastructure provision.</p>
M4.12.4	BCS12	<p><u>Community infrastructure facilities should be located where there is a choice of travel options and should be accessible to all members of the community. Where possible community infrastructure facilities should be located within existing centres.</u></p> <p><u>Existing community infrastructure facilities should be retained, unless it can be demonstrated that there is no longer a need to retain the use or where</u></p>

Change No.	Policy / Paragraph	Proposed Change
		alternative provision is made.
M4.12.6	4.12.5	<i>Delete paragraph</i>
M4.12.7	4.12.6 – 4.12.8	<i>Renumber as 4.12.5-4.12.7</i>
M4.12.8	4.12.6	4.12.5 The location of a community infrastructure <u>facility</u> will depend upon its function and service users. Day-to-day facilities will need to be within the communities they serve and should be located within local centres. Higher-level infrastructure facilities should be located within the most accessible parts of the city.
M4.12.9	4.12.7	4.12.6 It is important that all community infrastructure facilities <u>is</u> is <u>are</u> easily accessible by walking, cycling and public transport, and is <u>are</u> open to all members of the community. Where it is proposed to relocate community facilities it will be necessary to ensure that the community served is not disadvantaged by the change in location.
M4.12.10	4.12.8	4.12.7 Existing community infrastructure facilities <u>land and buildings</u> can be vulnerable to proposals for new uses or redevelopment. In such cases the council will need to assess the loss in terms of the social, economic and physical impact on the local community and the harm caused to the level of community infrastructure facilities provision in the area. Where the retention of community infrastructure <u>land or buildings used as community facilities</u> is found to be uneconomic, the council will consider the need for appropriate replacement infrastructure facilities in line with the needs of the community.
<i>Climate Change</i>		
M4.13.1	Delivery	The South West Sustainability Checklist For larger schemes, BREEAM for Communities provides an effective tool for assessing the performance of new development against the requirements of this policy. For large schemes of e.g. 100+ residential units, the use of BREEAM for Communities will be encouraged as an appropriate assessment methodology.
<i>Sustainable Energy</i>		
M4.14.1	BCS14	<i>Reorder paragraphs as follows: "Proposals for the utilisation, distribution and development..." "Development in Bristol should include..." "Consistent with stage two of the above..." "The use of combined heat and power..."</i>
M4.14.3	4.14.5 – 4.14.11	<i>Reorder paragraphs as follows: 4.14.5: New paragraph (see below) 4.14.6: "Proposals for development should be accompanied by an energy strategy..." 4.14.7: "The energy strategy should..." 4.14.8 ← 4.14.10: "All development will be expected to..." 4.14.9 ← 4.14.11: "Where the full requirements of..." 4.14.10: New paragraph (see Schedule of Potential</i>

Change No.	Policy / Paragraph	Proposed Change
		<p>Significant Changes)</p> <p>4.14.11 ← 4.14.5: "The development of a citywide CHP..."</p> <p>4.14.12: New paragraph replacing existing 4.4.8 (see Schedule of Potential Significant Changes)</p> <p>4.14.13 ← 4.14.9: "Where a new heating or cooling..."</p>
M4.14.4	New paragraph 4.14.5	<p><u>4.14.5 Environmental and economic benefits from the development of large-scale renewable and low-carbon energy installations and supporting infrastructure potentially include:</u></p> <ul style="list-style-type: none"> • <u>Reduction in CO₂ emissions and pollution through displacement of energy generated from fossil fuels;</u> • <u>Contribution to national and international targets for CO₂ reduction and climate change mitigation;</u> • <u>Contribution to local climate change and CO₂ reduction targets, including those adopted as part of the Sustainable Community Strategy (and as set out in the 20:20 plan);</u> • <u>Contribution to local and national targets for renewable energy generation and the government's commitment to zero carbon;</u> • <u>Reduction in dependence on fossil fuels, promoting energy security and reducing vulnerability to peak oil and potential negative impacts on the local economy from rising fuel, food and transport costs;</u> • <u>Development of a low-carbon economy with the creation of local employment and investment opportunities.</u>
M4.14.6	Delivery	<p><u>The council is exploring setting up an Energy Service Company</u> could be set up to facilitate the introduction of on-site renewable and low-carbon energy supplies and spread the associated risks and costs.</p>
<i>Sustainable Design and Construction</i>		
M4.15.1	Delivery	<p>Further guidance on sustainable design and construction measures will be offered in a supplementary planning document on <u>sustainability and mitigating and adapting to climate change mitigation and adaptation.</u></p>
<i>Flood Risk and Water Management</i>		
M4.16.1	BCS16	<p>Development in areas at risk of flooding will be expected to:</p> <ul style="list-style-type: none"> • be resilient to flooding through design and layout, and / or • incorporate sensitively designed mitigation measures, which may take the form of on-site flood defence works and / or a contribution towards or a commitment to undertake such off-site measures as may be necessary. <p><u>in order to minimise the vulnerability of the development to flooding ensure that the development remains safe from flooding over its lifetime.</u></p> <p>All development will also be expected to</p>

Change No.	Policy / Paragraph	Proposed Change
		incorporate water management measures to reduce surface water run-off and minimise its contribution to ensure that it does not increase flood risks elsewhere. This should include the use of sustainable drainage systems (SUDS).
<i>Affordable Housing Provision</i>		
M4.17.1	4.17.3	The need for affordable housing in Bristol is high. In 2006 lowest level house prices were more than eight times that of lower level earnings. This affordability gap has resulted in high levels of housing need which have not been met by lettings of local authority and housing association stock. In seeking to provide more balanced housing markets the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008) has proposed a policy target of at least 35% of all housing development annually to be affordable.
M4.17.8	Delivery	Financial contributions towards affordable housing secured from development will be used to meet the housing objectives set out in the Housing Strategy.
M4.17.9	Target	Provision of 6,650 affordable homes up to 2026, as set out in the Local Area Agreement.
M4.17.10	Indicator	<ul style="list-style-type: none"> Gross affordable housing completions (incl. Acquisitions new build, acquisitions and conversions) <u>citywide and by zone</u> per annum broken down as follows: <ul style="list-style-type: none"> a) Social rented homes provided; b) Intermediate homes provided; c) <u>S106 without public subsidy;</u> d) <u>S106 with public subsidy;</u> e) <u>All other public subsidy;</u> ef) Affordable homes total. (incorporates Core Output Indicator H5) <u>Average percentage of affordable housing secured through application of policy by zone per annum.</u>
<i>Housing Type</i>		
M4.18.2	4.18.6	In order to help create mixed, balanced and inclusive communities, development will need to make provision for a range of housing tenures, types and sizes. This will include the provision of affordable housing as set out in Policy BCS17. An appropriate mix of housing will need to be provided within individual developments, proportionate to the scale of development proposed. Smaller schemes will need to contribute to the mix of housing across the wider area.
<i>Gypsies and Travellers and Travelling Showpeople</i>		
M4.19.2	Delivery	A bid was submitted to the Homes & Communities Agency for the 2009/10 Gypsy Traveller Site Grant to fund a range of innovative proposals to meet the need for an additional 24 residential Gypsy & Traveller pitches and 8 Showpeople's pitches by 2011, however it was

Change No.	Policy / Paragraph	Proposed Change
		<p>unsuccessful. Consideration will be given as to whether a future bid will be submitted for the provision of both new residential sites and replacement transit site(s). A new bid was submitted in April 2010 for funding to develop 16 pitches, however, funding for Gypsy & Traveller sites has been withdrawn. The City Council is exploring the possibility of the delivery of sites (to meet identified need for the period to 2011) on council owned land.</p>
M4.19.3	Targets	To deliver RSS GTAA pitch requirements for Gypsies & Travellers and Travelling Showpeople by 2011:-
<i>Effective and Efficient Use of Land</i>		
M4.20.1	4.20.3	Land continues to be used efficiently within the city, with 96% of residential completions since 2000 exceeding the government's national indicative minimum of 30 dwellings per hectare. The efficient use of land requires appropriate densities to be achieved for all development. This will depend on the level of accessibility to employment opportunities, services and other facilities. Modelling undertaken by the council indicates that most areas of the city have good accessibility to these uses by public transport, walking and cycling.
M4.20.2	BCS20	<p><u>Where development is planned opportunities will be sought to use land more efficiently across the city. Imaginative design solutions will be encouraged at all sites to ensure optimum efficiency in the use of land is achieved. Higher densities of development will be sought:</u></p> <ul style="list-style-type: none"> • <u>In and around the city centre;</u> • <u>In or close to other centres accessible by public transport;</u> • <u>Along or close to main public transport routes.</u>
M4.20.3	4.20.4	Diagram 4.20.1 broadly illustrates how the approach to efficient use of land would be expressed in different areas of the city. It is not intended to directly inform decisions on planning applications and does not <u>take into account changes in accessibility that will arise from the implementation of planned major transport schemes.</u> Furthermore, for example, it does not identify the opportunities for higher density forms of development which may arise if a new centre is established in South Bristol. Diagram 4.20.2 overleaf illustrates various levels of residential densities from areas across the city.
M4.20.4	4.20.6	Development will be sympathetic to local character and provide high quality living environments and housing choice. <u>Higher densities should be sought where current accessibility levels are good and where planned improvements in accessibility (identified on the Key Diagram) have a reasonable certainty of being delivered, for example the 'Full Approval' of a scheme by the Department of Transport following a Major Scheme Bid.</u> In accordance with this policy, opportunities should also

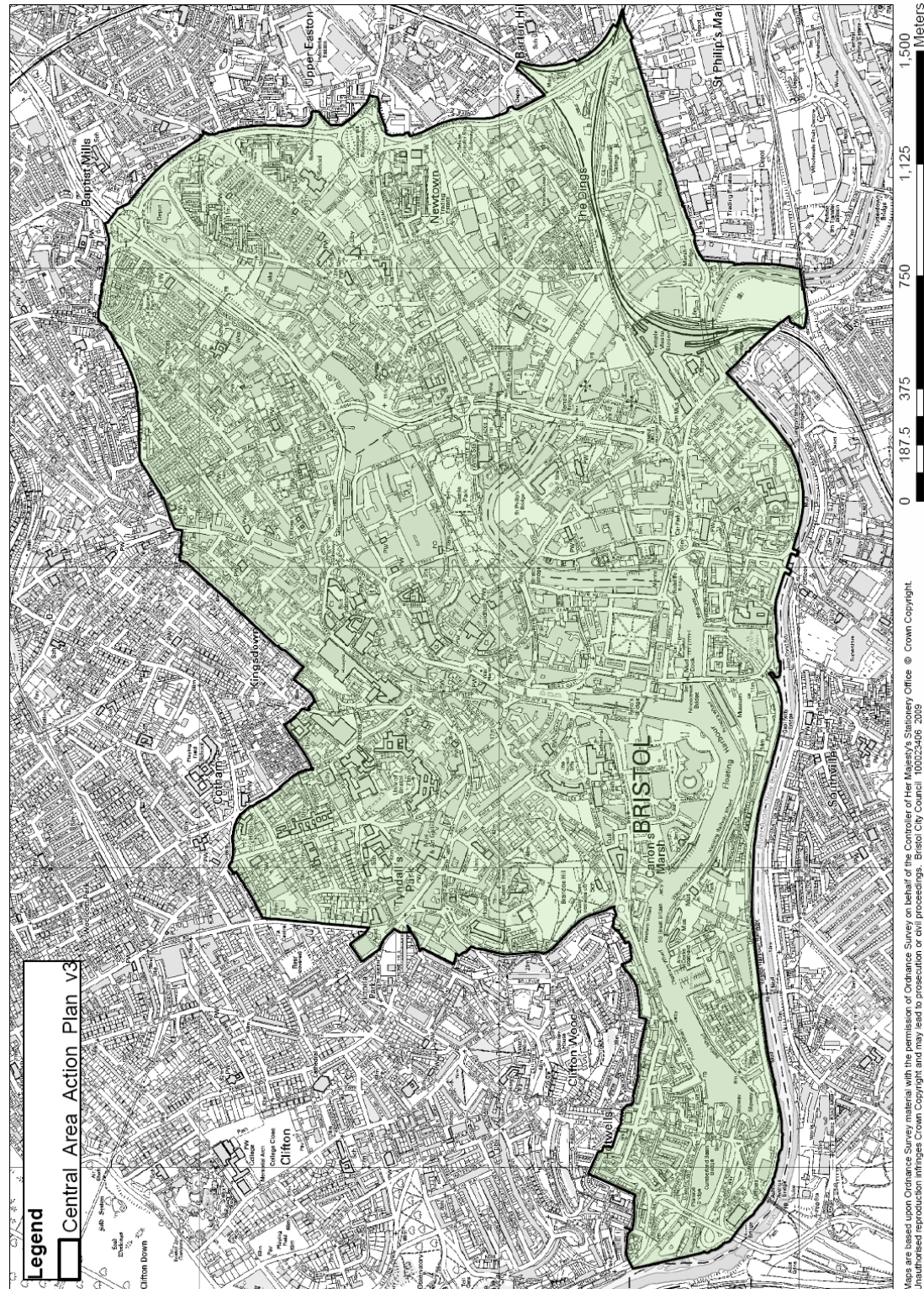
Change No.	Policy / Paragraph	Proposed Change
		be taken for imaginative design and arrangement of mixed uses in development to allow for increased plot ratios and the creation of more compact urban forms.
M4.20.4A	Indicators	Percentage of new dwellings completed per annum at: i) Less than 30 dwellings per hectare ii) Between 30 and 50 dwellings per hectare iii) Above 50 dwellings per hectare <u>Between 50 and 60 dwellings per hectare</u> iv) <u>Between 60 and 100 dwellings per hectare</u> v) <u>Above 100 dwellings per hectare</u>
M4.20.5	Diagram 4.20.1	<i>Change title as follows:</i> Diagram 4.20.1: Approach to the efficient use of land (indicative <u>illustrative</u>)
<i>Quality Urban Design</i>		
M4.21.1	BCS21	<ul style="list-style-type: none"> • Deliver a safe, <u>healthy</u>, attractive, usable, durable and well-managed built environment comprising high quality inclusive buildings and spaces that integrate green infrastructure.
M4.21.2	4.21.12	4.21.12 Development should deliver a multi-functional public realm comprising streets and spaces that can accommodate a wide range of appropriate uses and activities both now and in the future, which will assist in providing animation, vitality and surveillance. The provision and enhancement of green infrastructure and delivery of a coherent landscape scheme should be planned as an integral part of any development. Major development schemes should also enable the delivery of permanent and temporary public art, promoting a multi-disciplinary approach to commissioning artists in the design process.
M4.21.3	Delivery	<p><i>Add after first paragraph:</i></p> <p><u>A citywide urban context analysis will be undertaken which will inform the council and developers in the process of contextual appraisal and response. The analysis will be informed by community involvement. It will also draw on the evaluation work undertaken as part of the on-going programme of conservation area appraisals. The citywide urban context analysis will be produced in conjunction with the proposed supplementary planning document on urban design.</u></p> <p><u>Where needed to manage and promote change, the council will seek to work with stakeholders as appropriate in the preparation of area design frameworks, masterplans, design codes and site-specific briefs.</u></p>
<i>Conservation and the Historic Environment</i>		
M4.22.1	Delivery	<p>A citywide urban context analysis will be undertaken <u>as set out under Policy BCS21</u>. This will enable the production of a list of buildings and other heritage assets of special local interest. The analysis will be informed by community involvement. It will also draw on the evaluation work undertaken as part of the on-going programme of conservation area appraisals.</p>

Change No.	Policy / Paragraph	Proposed Change
		Urban context analysis (which includes characterisation); Conservation Area Character Appraisals and the Bristol Historic Environment Record will <u>also</u> be used to inform and understand the contribution heritage assets make to the city's character, identity and history.
M4.22.1A	Delivery	PPG15 'Planning and the Historic Environment', the emerging PPS15 'Planning for the Historic Environment' and the accompanying 'Historic Environment Planning Practice Guide' contain national planning policies and practice towards the historic environment and heritage assets. These will inform decisions on specific proposals.
M4.22.2	Targets (new section)	<u>Reduction in heritage assets at risk on national register</u> <u>Reduction in listed buildings on the 'Listed Buildings at Risk in Bristol' register</u> <u>Additional conservation area character appraisals and management plans completed</u>
Changes to Other Parts of the Core Strategy		
M6.1	Appendix A Table A1	EC2 — Promoting Growth: Industry and Warehousing EC3 — Promoting Growth: B1 Development
M8.1	Appendix C	<i>Replace all instances of "BCS12 Community Infrastructure" with "BCS12 Community Facilities"</i>
M10.1	Glossary	RSS — Regional Spatial Strategy

Appendix 1: New and Revised Diagrams

The following revised diagram accompanies the specific change in the schedule as numbered below.

Change M4.2.4



Appendix C

Changes that the Inspector considers are necessary to make the plan sound

Text to be deleted is shown with ~~strike through~~ and text to be added is shown underlined.

Change No.	Policy / Paragraph	Proposed Change
4 Delivery Strategy		
<i>Housing Provision</i>		
IC4.5.i	New paragraphs	<p><i>Insert immediately before policy BCS5.</i></p> <p>Projections of future changes to the population and economy are subject to significant uncertainties. Continued high levels of in-migration to the City or a higher rate of economic growth which results in higher demand for housing may have negative social, economic and environmental consequences. Such consequences could include increasing commuting into the city, and increasing overcrowding, sharing and concealed households. There may be adverse implications for the wider housing market area if the homes required to support the workforce, or population pressures, exceed the supply of housing land delivered within the Bristol City Council boundary. The Council also acknowledges that the SHMA suggests a substantial gap between forecast affordable housing need and potential affordable housing supply. The Council's choice of the scale of overall housing to be accommodated inevitably limits the number of affordable homes that can be delivered. The likely gap between affordable housing need and provision will have negative socio-economic consequences. These uncertainties and consequences reinforce the need to fully review the position within 5 years and to retain a contingency for additional housing if necessary. Development in the Green Belt is currently the only credible contingency to provide additional land for housing.</p>
IC.4.5.ii	4.5.15	<p>Urban extension in southeast Bristol – land at southeast Bristol could act as a long term contingency for future supply of homes. Such capacity is unlikely to exceed 1500 homes and is not expected to be subject to consideration until at least 2021 <u>800 homes if existing uses are retained. There is also some potential for new homes on smaller sites in the Green Belt in south west Bristol. Sites in the Green Belt would not be released for development unless a need for additional housing land is established by the monitoring of housing need and demand and economic growth referred to under Policy Delivery.</u></p> <p>(Relocate paragraph at end of "Explanation" before "Housing Figures".)</p>

Change No.	Policy / Paragraph	Proposed Change
IC.4.5.iii	BCS5	<p><i>Contingencies</i></p> <p><i>If monitoring shows that planned provision will not be delivered at the levels expected, or if land is required to accommodate higher levels of provision, the following contingencies for development of new homes will be considered in order of preference:</i></p> <p><i>1. Delivery from small sites / subdivisions;</i></p> <p><i>2. Mixed use development of some industrial and warehousing land; and</i></p> <p><i>3. Use of some Green Belt land including southeast Bristol as a long-term contingency for an urban extension development. The broad location is indicated on the Key Diagram.</i></p> <p><i>If the contingencies are required they will be brought forward in sufficient time to ensure that a continuous supply of land for new homes is maintained.</i></p>
IC4.6.i	4.6.4	<p>The delivery of <u>the number of</u> new homes <u>proposed in BCS5</u> does not require development of Green Belt land in Bristol within the period of the Core Strategy. However, Policy BCS5 allows for possible development <u>of in the Green Belt, including</u> land at southeast Bristol as a long-term contingency. Development at this location would need to be demonstrated to be both appropriate and sustainable. It should be noted that Bath and North East Somerset Council's Core Strategy Spatial Options (October 2009) do not contain proposals for development adjoining this area.</p>
IC4.6.ii	4.6.6	<p>The Core Strategy proposes to maintain the Green Belt unchanged. However, it is recognised that if an urban extension is developed <i>outside</i> the city boundary at southwest Bristol, this could fundamentally alter the role of Green Belt land <i>inside</i> the boundary in that area. In such circumstances this role would need to be reviewed. As explained in Policy BCS5 above, land inside the city boundary has significant development constraints and many areas of it are important in landscape and amenity terms. Therefore, although there is technical capacity for a small number of homes here, it would appear more appropriate to retain these areas primarily as open space even if Green Belt designation was to be removed.</p>
IC4.1.i	South Bristol key Diagram (4.1.1) and Key Diagram	<p>Legend: "Contingency for future development in southeast Bristol Up to 1500 <u>800</u> homes."</p> <p><i>Inspector's Note: The Council's proposed deletion of this Legend and the Icon from both diagrams has been removed from the list of deletions in S4.1.4 and S.11.1. The icon will need to be re-instated on the replacement new Area and Key Diagrams in Appendix 1 of Appendix A attached to this report.</i></p>

Sustainable Design and Construction

	<i>The replacement text recommended below was largely</i>
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		<i>suggested by the Council in the event that the Inspector imposed deletions from policy BCS15. Some minor changes from the published change</i>
IC4.15.1	BCS15	<p>Sustainable design and construction will be integral to new development in Bristol. In delivering sustainable design and construction, development should address the following key issues:</p> <ul style="list-style-type: none"> • Maximising energy efficiency and integrating the use of renewable and low-carbon energy; • Waste and recycling during construction and in operation; • Conserving water resources and minimising vulnerability to flooding; • The type, life cycle and source of materials to be used; • Flexibility and adaptability, allowing future modification of use or layout, facilitating future refurbishment and retrofitting; <p>Opportunities to incorporate measures which enhance the biodiversity value of development, such as green roofs.</p> <p><u>New development will be required to demonstrate as part of the Sustainability Statement submitted with the planning application how the above issues have been addressed. For major development and development for health or education uses, the Sustainability Statement should include a BREEAM and / or Code for Sustainable Homes assessment. Additionally, in the case of a super-major development, a BREEAM for Communities assessment will be required.</u></p> <p><u>From 2016 residential development will be expected to meet Level 6 of the Code for Sustainable Homes. For non-residential development, also from 2016, a BREEAM "Excellent" rating will be expected.</u></p> <p><u>Development will be required to meet specific sustainability standards as set out through established national methodologies, as set out in the table below. An exception will only be made in the case where a development is appropriate and necessary but where it is demonstrated that meeting the required standard would not be feasible or viable. These standards will be revised and updated periodically as sustainability methodologies and technologies develop.</u></p>
IC4.15.2	BCS15	<i>Delete table of Code and BREEAM Levels from policy text</i>
IC4.15.3	New paragraph 4.15.4A	<p>4.15.4A The assessment of major development against national sustainability methodologies will ensure that development engages thoroughly with issues of sustainable design and construction. Policy BCS15 does not set specific targets against these standards ahead of the national programme for zero carbon residential development by 2016; however, the score achieved in the assessment will serve to indicate how successfully development has addressed the relevant issues. Assessments should be completed by a</p>

		<u>licensed assessor. The Code and BREEAM measure should be used unless they are replaced by any such national measure of sustainability which is approved by the local planning authority. The expectation of residential development meeting Code level 6 from 2016 is dependent on the energy requirements of that level being embedded in the Building Regulations by that date.</u>
IC4.15.4	New paragraph 4.15.4B	<u>4.15.4B For the purposes of Policy BCS15, major development is defined as development of 10 or more dwellings or development exceeding 1,000m² of other floorspace, and super-major development is defined as development of 100 or more dwellings or development exceeding 10,000m² of other floorspace.</u>
IC4.15.5	4.15.4	4.15.4 The assessment of development against national sustainability methodologies <u>this policy will be integrated with the renewable and low carbon energy requirements set out in Policy BCS14 and measures to minimise the risk of and vulnerability to flooding as set out in Policy BCS16, and will form a part of the assessment of the impact of the development on climate change as set out in Policy BCS13.</u>
IC4.15.6	4.15.6	Delete paragraph
IC4.15.7	Indicators	<p>% of new homes (schemes including 10 or more homes) granted planning permission that achieve or exceed the required levels against 4, 5 and 6 of the Code for Sustainable Homes</p> <p>% of new non-residential floorspace (schemes including at least 5001,000m² non-residential floorspace) granted planning permission that achieves or exceeds the required levels against the BREEAM standard "Very Good", "Excellent" and "Outstanding".</p> <p><u>% of super-major schemes granted planning permission that achieve BREEAM for Communities "Very Good", "Excellent" and "Outstanding".</u></p> <p>% of new homes and workplaces with high speed broadband access and enabled for Next Generation broadband access</p>