



The Planning
Inspectorate

Report to Bristol City Council

By Simon Emerson BSc DipTP MRTPI

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

Date: 31st March 2011

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.

File Ref: LDF PINS/Z0116/429/3.

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