

FAO Mr S. Emerson
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Date: 12th July 2012

Our ref: BNES/39

Your ref: ID/28

Dear Mr Emerson,

B&NES RESPONSE TO INSPECTOR'S LETTER (ID/28)

Thank-you for your letter reference ID/28. Please find herewith the Council's response:

Council decision

The Council has carefully considered your preliminary conclusions in ID/28. In response to the options you have suggested on the way forward, the Council formally requests a suspension to the Examination. The Council's reasons for this and the anticipated timetable for undertaking the work are set out below.

Reasons for requesting a suspension and not withdrawal

Government has urged Local Authorities to ensure that an up-to-date Local Plan is in place as quickly as possible (NPPF para 184). The delay to the Core Strategy has significant implications for the Council. It will delay the preparation of CIL resulting in direct loss of income from April 2014 and it will delay the adoption of other needed SPDs currently under preparation. It may have an impact on housing delivery through the delay in providing clarity and direction for key development sites. In addition, the delay lengthens the uncertainty for residents, developers and all those with an interest in development. A suspension would entail less of a delay than a complete withdrawal. A withdrawal will entail the removal of the entire emerging policy framework in the Core Strategy requiring the Council to fall back on out-of-date Local Plan policies and the NPPF. Even those emerging policies which are potentially sound (with amendments) would be lost.

A suspension will also be less of a cost burden on the Council than a withdrawal

In response to the 3 particular concerns you highlight about suspension in paras 8 & 9 of ID/28, the Council makes the following observations:

- a. *Implications of a lengthy suspension:* The Council will take care to provide a clearly referenced evidence base and set of changes. The issues on which the review of evidence and further consideration needed are limited in scope, relating mostly to housing requirement and locations (if necessary). The other parts of the Core Strategy that require further consideration are limited.
- b. *Implications of significant changes:* The Council has already addressed some of the implications of a higher housing need and locational implications during the preparation of the Core Strategy. This will limit the work required. If it becomes apparent that the required changes amount to a significantly different

Plan, then the Core Strategy can still be withdrawn without wasted time. Furthermore if the changes are consulted on, then residents and other stakeholders will not be prejudiced.

c. *No guarantee of sound plan:* noted

Timetable

The broad timetable for undertaking the work required is set out below. It is essential that this timetable allows for the consideration of the CLG Household projections in December 2012.

1.	Review evidence (need to use Dec 2012 CLG Household projections)	Now to Dec 2012
2.	Develop changes <i>NB Council has already undertaken significant amount of work on alternative growth options</i>	Now to Jan 2013
3.	Update & clarify matters in Annex to ID/28 (4 months - overlap with 1&2 above)	Now to Dec 2012
4.	Council agrees changes to Core Strategy	Feb-March 2013
5.	Consult & consider comments	April -May 2013
6.	Resume exam & hearings (agree with Inspectorate)	July 2013
7.	Report (agree date with Inspectorate)	Oct 2013
8.	Adopt	Dec 2013

It will therefore take around 6 months to assess the evidence and options and establish the likely changes needed to the Core Strategy and longer before the hearings are resumed. The Council considers that this is the most appropriate route as it enables the issues you raised to be addressed with the least delay. The Council will allocate sufficient staff resource to the project to endeavour to ensure a swift response to the issues that need resolution.

Paras 1:35 & 36 of ID/28 have significant implications for the Council. You state that a cross-border SHMA and the determination of the optimum spatial distribution of identified needs around Bristol requires joint working between the relevant authorities. However he acknowledges that the Council cannot undertake this task alone and those Council's with adopted Core Strategies may be in no rush to undertake the necessary joint work. You conclude that this "leaves the evidence base for the B&NES Core Strategy in limbo". These circumstances relate to both the suspension and the withdrawal options. To enable B&NES to progress the Core Strategy and to ensure that the Duty to Co-operate is met, B&NES will agree an approach to working with neighbouring authorities. This will include the methodology for re-assessing housing need and the process for considering changes to the spatial strategy. This will entail the West of England Planning Housing & Communities Board as well as working with individual Local Authorities which will need to take account of their intended programmes for the review of their Core Strategies.

Other issues

In response to your offer in para 10 of your letter, the Council welcomes the preparation of a further short note dealing with any preliminary findings of unsoundness on matters not covered in the Annex to ID/28. That would enable the Council to include changes to meet any such unsoundness in one overall consultation on proposed changes during the suspension of the Examination.

I look forward to your response



David Trigwell
Divisional Director
Planning and Transport Development