

**B&NES CORE STRATEGY EXAMINATION  
CORRESPONDENCE WITH BRISTOL CITY COUNCIL**

*The informal correspondence between Bristol City & Council and B&NES in relation to consideration of a housing contingency location is made available in this paper in response to requests from participants at the examination hearings.*

## Part 1. Bristol City Council's response to Publication of B&NES Draft Core Strategy

Reply to: Paul Chick  
Telephone: 0117 903 6597  
Minicom: 0117 922 3854  
E-mail: [paul.chick@bristol.gov.uk](mailto:paul.chick@bristol.gov.uk)  
Fax: 0117 922 3883  
Date: 1st February 2011

Mr. D Trigwell,  
Divisional Director Planning & Transport Development  
Bath & North East Somerset Council  
Trimbridge House  
Trim Street  
BATH  
BA1 2DP

Dear David,

Thank you for the opportunity to comment on the Bath and North East Somerset Draft Core Strategy Publication version.

A report detailing the contents of the document was recently considered by the Executive Member for Strategic Housing and Regeneration, Councillor Anthony Negus and met with his approval.

The report concluded that the proposals in the Core Strategy to focus development in the urban areas of Bath, Keynsham and Somer Valley to support greater self-containment and limit the degree of commuting into Bristol support the principles of sustainability and are welcomed and supported by Bristol City Council.

In addition I would add that the spatial strategy for Bristol City Council included within the Core Strategy does not make provision for any urban extensions, and it prioritises the use of brownfield land for new development whilst retaining the Bristol-Bath Green Belt. This largely mirrors the approach taken in your Core Strategy.

The Bath and North East Council Core Strategy Publication Version is thus considered sound in all respects.

Yours sincerely,

David Bishop  
Strategic Director – City Development

## **Part 2: Correspondence between Bristol & B&NES relating to consideration of a B&NES Housing contingency location**

-----Original Message-----

*(In response to an initial request by B&NES for Bristol's views on the consideration of a contingency identified at Hicks Gate in B&NES)*

From: Colin Chapman [mailto:colin.chapman@bristol.gov.uk]  
Sent: 09 August 2011 10:30  
To: Simon De Beer  
Cc: Sarah O'Driscoll  
Subject: Re: B&NES Core Strategy

Dear Simon,

Many thanks for raising this informally with us. I've set out an officer view below. We will be very pleased to continue to work closely with you on the progress of the B&NES core strategy and I am sure members will also wish to engage with these issues.

Proposals for contingencies at either Whitchurch or Hicks Gate would be likely to be of great concern. The submitted B&NES Core Strategy indicates that the priority is to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger settlements in the Somer Valley. Identifying contingencies at Whitchurch and Hicks Gate would be clearly inconsistent with that strategy and result in a very different pattern of development than the submitted B&NES Core Strategy envisages.

Based on reasonable assumptions about future economic growth, the adopted Bristol Core Strategy has not identified a level of need for development which would have to be met outside the boundaries of Bristol. Any contingencies within the B&NES core strategy should, therefore, be aimed at addressing those development needs arising from the built up areas of B&NES - this would suggest that any contingencies should be associated with the key settlements referred to in the spatial strategy.

Contingencies located at Whitchurch and Hicks Gate would have very different impacts in terms of transport, infrastructure and service provision than would be created by the pattern of development set out in the submitted B&NES Core Strategy. In the case of Hick's Gate, any development that was not associated with development inside Bristol's boundary would result in an isolated community which would be unlikely to be a sustainable approach.

Should B&NES Council need to make use of any contingency at Hick's Gate, this would create pressure for development in the Green Belt within Bristol.

I hope that these informal comments are of assistance. As indicated above we will be very pleased to discuss these matters further.

Regards,

Colin Chapman, LDF Project Manager, Strategic Planning Team

-----Original Message-----

*(In response to request from B&NES for information on Bristol's position to a proposed contingency at Hicks Gate in B&NES -*

*"Thanks for your response. It is helpful for us to understand Bristol's position in assessing our contingency proposal, especially in light of the new duty to cooperate. Are you in a position to briefly clarify for me the following points about the adopted Bristol Core Strategy because the wording of the Core Strategy is not specific? I only need a brief response as I appreciate that not all these issues may not yet be fully worked out yet")*

From: Colin Chapman [mailto:colin.chapman@bristol.gov.uk]

Sent: 11 August 2011 14:26

To: Simon De Beer

Subject: RE: B&NES Core Strategy

Hello Simon - thanks for your message. I've copied your questions into this e-mail and put my thoughts below in italics.

1. What is the trigger to release the Bristol Hicks Gate contingency location for development? The Core Strategy states that this will be needed if existing sites do not come forward or if growth is higher than expected but are you able to be more precise ie is this reliant on housing delivery monitoring over a specific time period or monitoring economic growth rates?

**Bristol response: In the sound/adopted Core Strategy, SE Bristol is referred to as a 'long term contingency'. The first paragraph on page 58 refers to the review process. See also Chapter 5 - Monitoring and Review.**

2. Have high level technical assessments been undertaken which demonstrate the deliverability of this location, particularly the transport implications/requirements

**Bristol response: The approach of having a contingency at SE Bristol was deemed to be sound by the Inspector so we must assume that he was satisfied, in principle and in strategic terms, that development could be delivered. He saw various sources of evidence including work produced by us. With a bit more time I can identify the relevant documents that were referred to at the examination if that would assist.**

3. If it is considered that the location is needed to meet Bristol's housing needs, would releasing it entail a review of the Bristol Core Strategy and a decision from Council?

**Bristol response: It would require a decision by the Council. The precise mechanisms for releasing any land from the Green Belt would depend on the outcome of the review mentioned on Page 58 of the Bristol Core Strategy - but clearly a change to the development plan would be required to meet the requirements of PPG2 and the emerging NPPF. (At present there is no evidence to suggest that the contingency will be required).**

4. If developed, have your studies identified the effects on the parts of B&NES that adjoin Bristol eg transport, landscape etc. Can the location be developed without using land in B&NES? I am thinking about the Crest proposal. What level of assessments have been undertaken to determine the figure of around 800 homes ?

**Bristol response: The approach of having a contingency at S E Bristol and the indicative figure was deemed to be sound by the Inspector so we must assume that he was satisfied that, in principle and in strategic terms, any effects on land within B&NES would be acceptable or could be mitigated in the details of any proposal. The contingency is not dependent on development outside Bristol's boundary.**

5. Do your comments in your 5th para below (concerning a contingency at Hicks Gate in B&NES) still apply if Bristol decides to pursue an urban extension?

**Bristol response: If there was an urban extension within Bristol then any development in B&NES would no longer be physically separated by an area of undeveloped land. However, Bristol's concern is that any contingency within B&NES would need to be capable of being delivered independently as it would be aimed at addressing shortfalls arising within B&NES.**

Policy BCS6 of the Bristol Core Strategy acknowledges that proposals for urban extensions in the Green Belt in adjoining authorities may emerge through the development plans of neighboring authorities. Bristol's Core Strategy states that if appropriate proposals come forward the council will continue to work with the adjoining authorities to ensure integrated and well-planned communities are created. In the event that B&NES identifies Hicks Gate as the most appropriate location for a housing contingency, would this policy not apply?

**Bristol response: The Core Strategy refers to 'appropriate' proposals. At this point the submitted B&NES Core Strategy includes no urban extensions to Bristol and has a spatial strategy directed towards Bath, Somer Valley and Keynsham. Our informal view is that a proposed urban extension contingency at Hicks Gate would be inappropriate for the various reasons I've mentioned above and in my previous comments.**

**I hope those informal comments are of assistance. I am very happy to meet to discuss further if that would assist.**

**Regards, Colin**

-----Original Message-----

*(in response to email from B&NES to Bristol requesting agreement to publish informal correspondence between the two Authorities)*

From: Colin Chapman [mailto:colin.chapman@bristol.gov.uk]

Sent: 12 January 2012 16:27

To: Simon De Beer

Cc: Sarah O'Driscoll

Subject: Re: FW: Letter to bnes on publication version core strategy.doc

Hi Simon - thanks for your message - and belated happy new year to you.

Just a point of correction about the Bristol Core Strategy contingency at south east Bristol. It wasn't new and the Inspector didn't actually require us to have it. It was included in the Publication and Submission versions of our Core Strategy and the Inspector said that it should be retained. B&NES made submissions about the contingency through our Core Strategy process.

Rather than specifically a duty to cooperate issue, is this really an issue of whether the two Core Strategies have been part of a process of ensuring that strategic priorities across local boundaries have been properly co-ordinated? - as per existing guidance and paragraphs 44 - 47 of the draft NPPF.

For our Core Strategy we presented a document about joint working which usefully summarises the various elements of work which was undertaken - I have attached that. I'm satisfied that we've cooperated on cross boundary issues effectively throughout and our sound/adopted Core Strategy has shown that there are not needs arising in Bristol which we are looking to B&NES to help address (as per NPPF para 47). I understand B&NES has similarly concluded that there are no needs arising in the area which should be met in Bristol. The fact that our Core Strategies are appropriately co-ordinated seems clear from public statements and formal correspondence between the Councils - and also from the fact that Bristol's Core Strategy was adopted after being found sound.

The more recent correspondence with me is only a very small part of our liaison on producing core strategies over the years - and wasn't a particularly significant part of it. It was about the location of a possible contingency that you thought may need to be considered to address B&NES housing targets. As one of the possible locations under review was adjacent to our boundary, you kindly discussed this with us. You briefly summarised BCC's informal view in the report to your Scrutiny Committee/Council about contingencies and your Council ultimately concluded that there should not be a contingency in the Green Belt adjacent to our boundary at Hick's Gate. BCC did not raise any concerns regarding the subsequent proposed changes to the B&NES Core Strategy.

Please contact me if you would like to discuss this further.

Regards, Colin

Colin Chapman  
LDF Project Manager  
Strategic Planning Team