



# The Planning Inspectorate

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Mr Michael Reep – Planning Policy  
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Your Ref: «Reference\_Number»  
Our Ref:  
Date: 12 August 2014

Dear Sir,

## North Somerset Council Core Strategy

Thank you for your letter dated 24 July 2014.

### Examination Process

I note in particular the content of paragraph 4 of your letter. You state that it is your intention to increase the Council's housing requirement in Policy CS13 of the Core Strategy to 20,985 dwellings over the 2006 to 2026 period – a figure beyond the top the range identified by the Edge Analytics report – and that this would be an 'interim' position pending a review of housing requirements at the sub-regional level. Clearly this is a significant and worthwhile increase over the figure of 17,130 which was promoted at the Examination of Policy CS13 in March 2014. Whether the increase is sufficient to justify a finding that Policy CS13 is sound would, of course, need to be addressed through the Examination after I have received representations from interested persons. However, given the significance of the increase, I consider that it would provide a potential basis for moving the Examination forward.

In an effort to move towards comprehensive plan coverage, Inspectors have, in the past, been flexible about the number of Main Modifications which they will accept and I would adopt the same approach. I have noted your comments made in paragraphs 20-21 of Appendix A to your letter. In principle I agree with the points you make. I have seen nothing so far which clearly indicates to me that the Main Modifications which are being proposed by the Council would be sufficient to warrant a finding that the Examination should not proceed. Nonetheless, it may be that representations will be made on the basis that the changes are so significant that the Council should go back through the plan preparation stages in order that those with an interest have the

full opportunity to become involved. I would need to take these into account as part of the Examination process.

With regard to the way in which any backlog of housing provision against requirements is dealt with through the Examination, it will be for the Council to make its case that the backlog should be addressed across the whole of the plan period. If the Council's case is robust and pragmatic under all the circumstances – and it would appear that such cases have been successfully made elsewhere – then such an approach may be sound. However, that can only be assessed through the Examination process.

If the Examination is to proceed on the basis of Main Modifications then there will inevitably be some delay in the timetable whilst these changes are drafted and the necessary consultations are undertaken. I would remind you that it is already over 3 months since I wrote to you following the March 2014 Hearing sessions. Given the extent of the additional work involved, it would appear to me that it could be up to 6 months before the Examination can be resumed. This would already be a significant suspension and I do not consider that any suspension of greater duration would be fair to those with an interest in the DPD. A longer delay could also bring the Examination into a period when the West of England SHMA will be nearing completion. In these circumstances, if Policy CS13 was found to be sound and legally compliant, the period during which the Core Strategy could be operative pending a review could be unacceptably short and it may be more appropriate to take the document forward on the basis of the full, objective assessment of housing need provided by the West of England SHMA. What would be the Council's assessment of the period which would be required to bring the document back to Examination?

## **Other Matters**

Turning to some of the particular points you raise in your letter, the 'jobs-led' growth figure in paragraph 56 (2) ii of my letter was based on the information with which I had been provided by the Council at the time when the letter was written. If that figure has now been re-assessed, then I would be more than willing to see it reconsidered through any resumed Examination process. The Council will have the full opportunity to make its case and others will be able to make appropriate representations.

With regard to paragraph 26 of my letter, the West of England SHMA will be a key tool for all Councils who are assessing housing requirements in the sub-region. The need for, and vital role which will be played by, such a document has been recognised for some time. I do not suggest that the publication of the document has been delayed – whether deliberately or otherwise. The disappointment expressed in my letter derives from the fact that limited progress in the preparation of the document has been made to date. It may have been expected that, in the knowledge that a review of their housing requirements was likely to be necessary, participant Councils would have been seeking to drive forward the completion of the SHMA to ensure that it is available at the earliest opportunity. However, this does not appear to have happened. Whilst I note your stated commitment to this review, you will recall that the modified version of Policy CS13 which was put before me at the Examination contained no firm commitment on the Council's part to a timetabled review before 2026. It was only through a Main Modification promoted during the Examination process that the Council proposed a review by 2018.

I hope this response will help you to a decision on how you wish to proceed from this point. Please let me know your intentions at the earliest opportunity.

Yours faithfully,

*R Punshon*

INSPECTOR