



The Planning Inspectorate

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Mr Michael Reep,
North Somerset Council,
Somerset House,
Oxford Street,
Weston-super-Mare,
Somerset,
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Your Ref: «Reference_Number»
Our Ref:
Date: 6 September 2013

Dear Sir,

North Somerset Council – Core Strategy.

I refer to your response dated 21 August 2013 to my letter of 6 July.

In your response you refer to my having 'pre-judged' the outcome of the re-examination and having displayed a 'lack of balance' in my letter. I can assure you that this is not the case. However, it is important for me to raise with you areas of concern which I consider that the Council needs to address in putting forward a sound case on the remitted Policies. It would be of no benefit to anyone for me to re-examine the Core Strategy and then find that there are areas of unsoundness. Similarly, I am cautious about the handling of the re-examination as I wish to avoid any possibility of further legal challenges. I hope you will see, therefore, that my methods and approach are in the best interests of securing a successful re-examination at the end of the day.

Turning to the contents of your response:

In paragraph 2 I accept the point which you make. However, if the reasoning which is employed to conclude that the housing figure in Policy CS13 is flawed, then the figure itself must be open to question. The re-examination will need to consider whether the evidence leads to a firm conclusion on that figure.

In paragraph 3, I accept that Policies CS20 and CS16 are not remitted for re-examination. In particular Policy CS20's proposals in terms of the provision of jobs is not in question. My question would be, however, is whether the calculation of housing requirement using the houses:jobs multiplier as detailed in your response represents the 'full, objectively assessed needs for housing' ... 'in the housing market area' as required by the National Planning Policy Framework (NPPF) or whether it represents only part of that need?

I agree that it is in everyone's interest that projections of the housing requirement

should be made on the basis of the best and most reliable information available. I would only repeat that there must be persuasive evidence that the methodology involved leads to a proper assessment of the 'full, objectively assessed' needs for housing' ... 'in the housing market area'.

With regard to paragraph 16 of your response, my decision not to read the previous Inspector's Report has been deliberate. I have no wish to leave myself open to claims that I am simply seeking to endorse the earlier conclusions which were reached.

In paragraph 18 you quote from my letter. You will see that I was referring specifically to Policy CS13 in that sentence. My view was not intended to apply to any other policy other than those remitted for re-examination.

I apologise if I suggested that the Council had knowingly substituted its chosen houses:jobs multiplier approach for an objective assessment of housing requirements. I fully accept that the Council considers that its chosen methodology is an objective assessment in itself. This, of course, would be a matter to be assessed through the re-examination process.

Other than this, I have little to add. I would suggest that the Council assembles its evidence to respond to the areas of concern and to the questions set out in my earlier letter. The Council should then reconsult on the assembled evidence giving exactly the same opportunity for representations to be made as was given at Publication stage. The reconsultation exercise should make clear that, in the first instance, only Policy CS13 will be re-examined with any consequential effect on Policies CS14, CS19, CS28 and CS30-33 being re-examined at a later date should this be necessary. The Council should also make clear that no other policies will be re-examined.

When the representations have been received I will arrange for the necessary Hearings to take place.

Yours faithfully,

Roland Punshon

INSPECTOR