

South Gloucestershire Core Strategy Exploratory Meeting

Following my preliminary reading of the South Gloucestershire Core Strategy (CS) I have some concerns which have led me to call an Exploratory Meeting (EM). I consider these matters merit further discussion before deciding whether I should continue with the examination into the Plan.

A draft agenda was distributed covering those matters I initially identified for discussion at the EM. Having read the representations, including those responding to my invitation for comments on the Government's 'Plan for Growth', I am satisfied my earlier agenda will suffice for the purposes of this meeting. This is available on the Council's website for those who may not have received a copy.

I stress again that the EM will not be a forum to discuss the merits of any policy, location or particular site but is intended to assist in my deliberations about how the process should be moved forward. Nor does my decision to hold an EM mean that I have taken any view on the soundness of the Plan.

The purpose of this note is to set out areas where I would appreciate the views of the Council, ideally prior to the meeting. This includes matters where I am seeking clarification as well as those which could potentially have a bearing on how best to progress the Plan.

1. Procedural and Legal Compliance (Agenda Item 3)

- Have the necessary stages of plan production been followed and has the process of plan production been fully consistent with development plan regulations?
- Has there been adequate consultation carried out at the appropriate stages for all aspects of the Plan including the Proposals Map?
- Does the Plan introduce matters of detail which should be deferred to a subsequent Development Plan Document (DPD)?
- Is the Sustainability Appraisal (SA) comprehensive and does it comply with the requirements of the EU Directive on Strategic Environmental Assessment (SEA Directive 2001/42/EC) and associated Environmental Assessment of Plans and Programmes Regulations 2004 (SI No. 1633) in identifying and explaining what reasonable alternatives to the proposed policies have been considered and why they have been rejected? (For further information see: [Save Historic Newmarket Ltd v. Forest Heath District Council \[2011\] EWHC 606](#))

2. Housing (Agenda Item 4)

- There are obvious tensions between the Council's housing strategy and the figures proposed in the draft RS and in the

Secretary of State's Proposed Changes, 2008. Having regard to the status of the draft RS and the Proposed Changes, what are the implications of the most recent Court of Appeal judgement¹ for the Council's strategy?

- Is there sufficient, robust evidence to support the Council's alternative housing target? How closely does this accord with the approach advocated in paragraph 33 of PPS3?
- What is the Council's position regarding the latest ONS household projections?
- How do you reconcile the housing targets in the CS with the Government's agenda on 'Planning for Growth' and the ambitions of the West of England Local Enterprise Partnership (LEP) for the region? Is there not a serious risk that constraints on housing supply would undermine economic prospects for the area and how, if at all, have you factored in the housing pressures in the wider sub-region?
- More generally, is there flexibility in the CS to cope with unexpected change?
- Are there outstanding issues with site delivery? I am concerned that there may be gaps in the detail on some aspects of the strategic allocations in the CS in terms of infrastructure provision, flood risk etc which could jeopardise plan delivery? In short, is there sufficient evidence to demonstrate that the proposals are achievable?

3. Green Belt

(Agenda Item 5)

- Should the CS delegate Green Belt (GB) boundary changes to subsequent DPDs as would happen with one of its proposed neighbourhoods and the possible identification of a contingency site?
- Doesn't this approach undermine the effectiveness of the CS by calling into question whether proposals can be delivered, especially if supporting infrastructure is not forthcoming?
- Has an appraisal of GB land been carried out to identify and justify the changes to the GB, including the need for safeguarded land (PPG2, para. 2.12)?

4. Filton Airfield

(Agenda Item 6)

- Filton Airfield is a significant part of the North Fringe Area. Is it appropriate or sufficient to deal with the closure of Airfield as a separate component of the CS and devolve further consideration to a future DPD?

pc 16/6/11

¹ Cala Homes (South) Limited and Secretary of State for Communities and Local Government and Another (May 2011)