

Mr P Crysell
C/o Kath Thorne
Programme Officer
South Gloucestershire LDF – Core Strategy
Examination

Date: 2nd September 2011
Your Ref:
Our Ref: PCD6/examination
Enquiries to: Patrick Conroy
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By Email

Dear Mr Crysell,

South Gloucestershire Response to Inspector's Letter 15th August 2011

Thank you for your letter dated 15th August. The Council has now had an opportunity to consider the matters you have raised and I would reply as follows.

We are pleased that you recognise that, provided some additional work is completed within a period of six months from September 2011, the Plan is capable of proceeding to EiP. We accept that to commence the examination before sufficient information is available could be counter productive. However, we remain of the firm view that there is great merit in using the EiP process to work through the main issues and challenges. We are also acutely aware that five months have now elapsed since we submitted our Core Strategy and that this plan is being prepared against the background of the Government's planning reforms.

In this context, I have set out below the Council's response to the areas of further work that you have identified, supported by a detailed timetable to demonstrate that this can be completed to ensure that the EiP can proceed. We are confident that this can be undertaken, the resources allocated to complete this work within the deadlines set, and we are on track to complete the tasks you have identified.

Housing

We welcome your agreement that the soundness of the Plan with regard to establishing the housing requirement for South Gloucestershire can only be assessed by progressing the Examination. In response to the issues you have raised, I have to reiterate our view we do not consider that the RS should continue to be given considerable weight. Our position is that the weight to be attached to the RS is now greatly diminished as set out in our Housing Justification Paper (EB21) at para 3 and also in the Council's response to the Exploratory Meeting Questions at paragraphs 3.1 to 3.5. This view was also supported by the inspector at the Williams Close Appeal in March 2011 reference (APP/P0119/A/10/2138335).

In essence it is the Council's view that significant weight would only be required to be attached to the new RS for the South West if it had been published. However, there is no basis for this, as set out in Council's response to the Exploratory Meeting Questions at paragraphs 3.1 to 3.5 as Section 24 (1) of the Planning and Compulsory Purchase Act 2004

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is not engaged with regard to the draft RS and that the draft RS for the South West will never become the statutory RS. Moreover, the increased housing numbers and how they were apportioned was not subject to a SEA compliant process that has been tested at EiP. This resulted in the SW RS being put on hold in light of the St Alban's decision re the South East RS. This further diminishes the weight that can be attached to the RS as a material consideration.

We respect your assessment that further work is required in accordance with PPS12 and PPS3 to ensure that our locally based housing requirement is driven by objectively assessed evidence which balances consideration of both supply and demand issues within the context of the Government's localism agenda. Building on the information we presented at the EM I can therefore confirm that we will undertake the following:

- Strengthen our Housing Requirement Paper with further work to provide a detailed breakdown of the differences in approach to assessing and meeting housing needs between the CS and the RS and the evidence in support of the Council's position. This will include a review of the latest ONS projections and recent economic forecasts to respond to your concerns that the CS adequately supports the delivery of economic growth and sustainable patterns of development.
- Confirm and clarify the flexibility that exists in the CS to deal with changing circumstances and how the Government's pro-growth agenda can be accommodated without significant implications for the Plan's spatial strategy and the SA.
- Publish this work and consult on post submission changes to the CS between December and January 2012 to demonstrate that there is flexibility within the plan to bring forward further development without compromising the plan's overall existing spatial strategy
- Provide you with all responses to the consultation, suitably collated by the end of January 2012.

Green Belt

We welcome your recognition that amendments can be made to the CS to clarify the status of the GB changes and the strategic role of the Plan. Part of this work would include restating the position explained at paragraphs 4.1 to 4.4 of the Council's response to the Exploratory Meeting Questions and presenting this for consultation. In addition, we will provide an assessment of the Green Belt to determine whether the areas to be removed are the most appropriate ones and to ensure compliance with PPG2 and the draft NPPF. Building on the information we presented at the EM I can therefore confirm that we will prepare and publish a GB assessment which undertakes the following:

- Demonstrates that the Council has reviewed all GB boundaries and to establish whether they remain appropriate against the Plan's development strategy and policy framework.
- Confirm through proposed changes to Policy CS5 that it is not the intention of the Core Strategy to delegate Green Belt changes to subsequent DPDs in respect of the East of Harry Stoke New Neighbourhood
- Consult on post submission changes to the CS between December and January 2012
- Provide you with all responses to the consultation, suitably collated by the end of January 2012.

Filton Airfield

The comments that you have made regarding the actions the Council has taken since the announcement in April 2011 that the airfield was due to close are welcomed. As you are aware the Core Strategy was at an advanced stage when this announcement was made and we are therefore currently responding to external events which are not wholly within our control. Notwithstanding this, the importance of providing a clear strategic planning policy

framework to direct and guide sustainable development in this strategic location is fully recognised. To this end, we are continuing to work closely with BAe Systems, key stakeholders and our communities. We also understand that further technical evidence and the further iteration of policy is needed. Building on the information we presented at the EM I can therefore confirm that we will undertake the following:

- Continue to work with BAe Systems to complete the technical work needed to support the identification of Filton Airfield as a strategic allocation in the CS in accordance with PPS12.
- Work closely with BAe Systems, Bristol City Council, key stakeholders and our communities to further develop the vision, spatial objectives, place making principles and infrastructure required to support Filton Airfield as a strategic allocation
- Re-cast Policy CS25 and CS26 with supporting technical/ infrastructure delivery evidence to provide the direction, certainty and context for Filton Airfield redevelopment
- Consult on post submission changes to the CS between December and January 2012
- Provide you with all responses to the consultation, suitably collated by the end of January 2012.

Procedural and Legal Matters

We welcome your conclusions that the series of proposed changes were subject to consultation and are therefore embedded as revisions to the Pre-Submission Publication Draft CS.

Sustainability Appraisal Update

We agree that any changes made to the CS will need to be fully appraised through the SA process commensurate with and proportionate to, the level and detail of plan making set out in the Core Strategy. We also note your comments about the Abbeywood Retail Park and will respond to this as relevant and appropriate.

Appropriate Consultation

We understand the requirement to ensure appropriate consultation is undertaken in light of any revisions to be made to the CS. As explained above consultation will be undertaken as an integral part of the work tasks identified above. We intend to re-publish the Core Strategy in December 2011 for 6 weeks consultation incorporating post submission changes. This would also be supported by the necessary technical evidence and SA.

NPPF and Government Planning Reforms

It will be necessary to ensure all stakeholders can assess the impact on the CS of the NPPF. We would therefore seek your agreement to prepare a statement setting out the views of the Council as to the materiality or weight to be attached to the NPPF based on Annex A of the Planning Inspectorate Guidance on the NPPF.

Bath & North East Somerset and North Somerset EiPs

We are also aware that our adjoining unitarity authorities - Bath & North East Somerset and North Somerset that form part of the strategic West of England area are also at Submission stage and are preparing for their respective EiPs. Both these authorities have significant areas of Green Belt and experience acute pressure for housing demand and need. It is important for South Gloucestershire Council to understand that PINS are considering each Core Strategy in a consistent and fair way, while respecting the individual nature of each plan.'

Future Progress - Way Forward

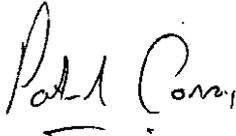
It is our clear understanding that the Government does not intend to delay Core Strategy adoption with the expectation that all parties exercise best endeavours to achieve a pragmatic and lawful core strategy. As the Council has consistently stated, significant further delay in proceeding to Public Examination could have serious consequences for the Council's ability deliver on the Government's commitment to managing growth through the plan led system and avoiding the very real risk of planning by appeal. Our clear preference is therefore to agree to suspend the CS for a period of 6 months. As set out above and in the timetable attached, we are confident that the work required can be produced, the SA and the necessary consultation undertaken and the information provided to you by the end of January 2012. This would enable us to progress to Examination in March 2012.

Summary

Therefore our preference is to progress on the basis of suspending the examination for 6 months. We would also like to request the following:

- An opportunity to maintain a dialogue with you through the Programme Officer
- We will provide you with a update on the progress reached by the end of November
- To set a 'provisional' date for the pre-hearing meeting in December 2011.

Yours sincerely



Patrick Conroy
Spatial Planning Team Manager

Appendix 1**Suggested Revised Core Strategy Timetable – Core Strategy Examination delayed by 6 months**

No.	Task	Target
1	Council publishes response to inspector's letter	26 th August 2011
2	Undertake Housing and Green Belt work tasks and draft CS policy revisions	September to November 2011
3	Undertake Filton Airfield public engagement/ visioning, technical work and draft CS policy revisions	September to November 2011
4	Update Sustainability Appraisal	September to November
5	Advertise Pre-Hearing Meeting *	7 th November 2011
6	Pre-Hearing Meeting *	6 th December 2011
7	6 weeks consultation on the December 2011 Core Strategy incorporating post submission changes	December 2011 to January 2012
8	Council collates results of consultation and provides hard copies of responses to inspector	31 st January 2012
9	Inspector considers results of consultation and draws up questions	1 st February 2012
10	Inspector gives all parties 3 weeks to respond *	22 nd February 2012
11	Advertise start of hearings *	8 th February 2012
12	Hearings*	6 th March 2012

* Milestones depend on inspector's confirmation