

South Gloucestershire Council

HOUSING PROVISION OPTIONS PAPER

1. OPTIONS:

- 1.1 Following discussions at Matter Sessions 7 and 8, relating to housing land supply, the Inspector has published a formal note, dated 30th June, inviting the Council to set out options for taking the CS forward, if he is concerned as to the level of housing provided for in the plan, whether by means of a further period of suspension, early review of the Plan or any other mechanism. This paper sets out the response of South Gloucestershire to these questions. It also sets out the Council's proposed approach to revisions to policy CS15 and the provision of a 5 year housing land supply as this matter is integral to establishing a procedure to produce a sound CS.
- 1.2 South Gloucestershire Council proposes it will be possible for the Inspector to find the Core Strategy sound through the main modifications proposed by the council post submission together with any other main modifications he considers necessary. This is also a view shared by the majority of participants who attended Matters 7 and 8. The Council's response to the Inspector's note is made in this context and is set out below.
- 1.3 The Council has structured its response by considering the differing merits and practicalities of 3 options:
 - (1) Suspension of the Core Strategy process. Suspension of the Core Strategy process would take place to enable additional strategic / non strategic housing sites to be identified, assessed, and put forward as proposed modifications to the Core Strategy at a later resumed oral examination ("The suspension option").
 - (2) Inclusion of a Review of housing need in the Core Strategy. This would require the provision for a review of the housing requirement in the plan within the 15 year plan period as a main modification. Policy CS15 would include the need for a review of the housing requirement before the end of the plan period and if necessary the identification of sites to meet that requirement ("The review option").
 - (3) The Council publishes an interim housing statement. This option has been promoted by some representatives of the development industry who have relied upon examples at Taunton Dean BC, Exeter CC and Cotswold DC (RE6-8) ("The interim option").

1.4 These 3 options are considered in turn followed by the Council's recommendation to the inspector as to the most appropriate way forward.

2.0 The Council's Primary Position

2.1 The Council's primary position is that it has demonstrated an evidential case to objectively justify the housing requirement of 26,400 as set out in the Core Strategy at Policy CS15. In accordance with requirements of the NPPF (the Framework) the Council considers the level and distribution of housing set out in the Core Strategy is firstly, appropriate to meet the identified needs of South Gloucestershire, secondly is the best outcome that will contribute to sustainable development when tested against reasonable alternatives, and thirdly is a level of development that is achievable and deliverable. Moreover, as stated in oral evidence to the EiP, in line with the NPPF, no neighbouring authority currently has an identified housing shortfall that South Gloucestershire is required to meet.

2.2 Therefore South Gloucestershire Council has planned positively and is compliant with the Framework on the basis of the evidence submitted by it on housing need and in particular the most up to date demographic (SNPPs 2010) and economic (strong trend growth) evidence, as set out in Examination Library reference PS8. This justifies the council's approach to plan for the housing need to 2027 by the provision of 26,400 homes, as set out in SGC PSM6, which is sufficient to meet the needs of the District. This approach is consistent with paragraphs 153, 154 and first bullet point of 182 of the Framework.

2.3 However the Council has assessed the three options identified above should the inspector take a different view on housing requirement to that set out above .

3.0 Consideration of Options

3.1 **Option 1 - Suspension of the Core Strategy process to enable additional strategic/ non strategic housing sites to be identified, assessed, and put forward as proposed modifications to the Core Strategy.**

3.2 This option has substantial disadvantages and few, if any, advantages. The substantial disadvantages are:

- i. The period covered by the South Gloucestershire Local Plan has now expired. Whilst still part of the development plan for the purposes of section 38(6) of the Planning and Compulsory Purchase Act 2004 it will nevertheless start to attract diminishing weight as set out in the NPPF. The planning process is intended to be plan led. If South Gloucestershire is left without an up to date plan for an undetermined period this will undermine the fundamental policy objective of how the planning system is intended to operate. It will create uncertainty and delay,

risking the emerging Core Strategy being subject to further changes to the planning system from the Government which will also have to be assessed, consulted upon and then included in the plan which will give rise to further delay. It is unlikely that a six months suspension, the maximum likely to be feasible, would be sufficient to conduct a process of identifying, assessing and selecting the additional strategic sites given the controversial nature of the sites likely to have to be considered. The need for Sustainable Appraisal is likely to lead to further delay and legal complexity.

- ii. It will inevitably lead to planning applications being made for sites contained in the Core Strategy without an adopted framework to guide decision makers on those applications. This has already started with applications having been made for North Yate and South of the Airfield. This undermines the plan led process and community engagement in that process. This further risks planning-by-appeal as developers lose patience with the progress being made in delivering a local policy framework within South Gloucestershire. The delivery of the council's vision for South Gloucestershire would be fatally undermined, and the opportunity for the coordination of the delivery of strategic infrastructure would be lost.
- iii. It is also likely that it will lead to planning by appeal for sites not allocated in the core strategy as developers seek to exploit a policy vacuum. It will compromise the Council's ability to demonstrate a 5 year land supply in accordance with paragraph 47 of the Framework as debates will arise on the appropriate housing number to calculate the requirement and the relevant sites against which any five year supply should be assessed. The risk of ad hoc planning by appeal leading to uncoordinated and potentially unsustainable development is substantial.
- iv. There is no guarantee that at the end of the process there would be the necessary political support for the identification of additional strategic/ non strategic sites. Instead the council may vote to withdraw the Core Strategy. This would be a significant waste of the effort and progress that has already been made.
- v. Whilst a potential advantage of this option is that the plan would provide for a greater level of housing through further identified sites the delay that would inevitably occur to achieve this will give rise to the problems outlined above. Any possible benefit of this option is therefore clearly outweighed by the disbenefits.

3.3 Option 2 - The Core Strategy contains a commitment in Policy CS15 to review before the end of the plan period the need for additional housing and for sites to meet that need to be identified.

3.4 The review option suffers from none of the disadvantages of suspension set out above. In particular:

- i. It gives clarity and enables the current Core Strategy to be found sound in its entirety without delay.

- ii. It provides certainty and emphasises the commitment to a comprehensive planned system, essential to achieve the vision and objectives of the Core Strategy.
- iii. It ensures provision is made for strategic growth and the supporting infrastructure needed to support sustainable communities.
- iv. It enables the Policies, Sites and Places DPD in combination with Neighbourhood Plans to bring forward non-strategic sites in accordance with local community objectives.
- v. It reduces to the minimum the potential for planning-by-appeal, ensuring CS15 is compliant with the NPPF paragraph 47 including the 5 year land supply.
- vi. It allows for the full effects of the post-recession and impacts of the housing market and infrastructure delivery to be fully assessed and known.

- 3.5 It would be a matter for the inspector to determine the point at which such a review should be considered, but the council's recommendation would be that this should be no earlier than 2021. This will enable sufficient time to have elapsed for the council to consider the extent to which the need within South Gloucestershire had grown in line with or ahead of the council's projections (economic and demographic), as well as how successful the opportunities presented by neighbourhood planning have proven to be. It would also provide sufficient time to influence the end of the plan period and inform any emerging replacement plan.
- 3.6 A shorter period would effectively require an almost immediate commencement on the work of a review – certainly within 12-24 months, putting the delivery of the plan into an almost immediate period of risk of challenge through speculative planning applications. It is also unlikely that the current almost unprecedented economic uncertainty will have settled sufficiently within this 12-24 month period to enable any more meaningful analysis of trends to be undertaken than is presently the case. This adds to the justification for a sufficient period of time to elapse before a review is required to ensure there is time for markets to readjust following the recession and more stable market conditions to emerge. It is considered that for the reasons set out above a requirement for a review in 2021 strikes the right balance between not being too soon or too late.
- 3.7 Moreover, the requirement to undertake an HMA wide SHLAA (NPPF paragraph 159) can quite reasonably be addressed in this intervening period. The importance of having an up to date development plan in place for South Glos – and the ability to use that Plan to deliver sustainable development, is fundamental to the communities of South Glos. Furthermore it gives a period of time to allow the other West of England Unitary Authorities, who unlike South Gloucestershire have made no strategic releases of land in the green belt and who in two instances have provided levels of housing substantially below that of South Gloucestershire, to review their pre-NPPF Core Strategies and to make any necessary revisions to their plans in accordance with the Framework to address housing supply issues within their respective administrative areas/ sub regional via a HMA SHLAA. This would enable

the West of England to move forward to review strategic growth requirements in a consistent way from 2021 to look forward to the period post 2027.

3.9 Option 3 - That the Council publishes an interim housing statement.

3.10 This suggestion has come from participants at the examination who have provided Interim housing statements by three planning authorities. These are:

- Taunton Deane Borough Council – Examination Library reference RE5 and RE6
- Cotswold District Council - Examination Library reference RE7
- Exeter City Council - Examination Library reference RE8

3.11 The common factors which were relevant to these Councils preparing such statements appear to be:

- There was no up to date development plan / spatial strategy which is capable of supporting a 5 year land supply position
- That significant deliverability issues had been identified with major sites/ urban extensions in these authorities which could not be addressed in the short term to support the 5 year land supply.

3.12 At the outset the council suggests that an interim housing position is very much a last resort option as such a document is not plan led as it is not an adopted development plan which has been the subject of extensive consultation, community participation and independent examination. An up to date adopted core strategy as a matter of principle is much the preferred option and intended to be so by the legislative and policy framework for the delivery of the development plans. An up to date core strategy should be capable of ensuring that the trajectory of deliverability in order to meet housing need over the plan period and in respect of which a five year supply plus contingency is to be assessed is, at least at the date of adoption of the plan, achievable.

3.13 In addition the council has the following concerns about this approach

- All authorities fell short of being able to identify a five year supply of housing sites and significantly unable to identify available sites in years 6 to 15. Apart from “small site windfalls” all South Glos sites identified are known sites and the majority are already in the system (PP, Resolution to grant PP subject to S106, SGLP allocations, CS sites and sites with pre app discussions).
- Exeter is the closest comparison with South Glos, but their problems in part arise from delays in handling major applications. South Glos have processes in place and work closely with development partners through its Major Sites Team to progress applications/proposals as swiftly as possible and the Council has been active and successful in helping unblock ‘stalled’ sites. A

fact recognised by the Inspector at the Williams Close appeal, March 2011 (Examination Library ref E73 at paragraph 34)

4. Demonstrating additional flexibility to respond to rapidly changing circumstances

- 4.1 Taking all the above into consideration, the Council considers it is possible to identify a 5 year supply of deliverable sites when set against the CS requirement in order to comply with paragraph 47 of the Framework. The basis for this is as follows:
- 4.2 At the December 2011 CS as amended (Examination Library ref LR1) provision is made for 6,635 dwellings. This compares with an annualised provision of 7,285 over the next 5 years based on an annual rate of delivery of 1,457. However, in order to avoid planning by appeal, the plan will not deliver equally over the plan period as this would result in unsustainable patterns of development and would be contrary to the Plan's overall vision and development strategy. Therefore housing numbers are phased in Policy CS15 in order to recognise this inter-relationship with the Plan's overall development strategy.
- 4.3 Notwithstanding, the Council is able to show further flexibility to boost supply and ensure a 20% buffer is also provided through the provisions of the development plan. We demonstrate this as follows:
- i. Making an allowance for windfall sites (small sites of 1-9 dwellings) in accordance with paragraph 48 of the Framework ensures the supply of a further 1500 dwellings for the period 2012 – 2022. This introduces a further 750 dwellings into the first 5 year period and a further 750 into the second phasing period.
 - ii. The Council recognises that subject to the necessary assurances being given by developers at Peg Hill, North Yate which addresses the need for comprehensive development, as confirmed by Mr Mellor at Matter Session 21, a further 250 dwellings in addition to that shown for the North Yate New Neighbourhood at the entry 0133 of the April 2012 RLS (Examination Library Ref EB5/2) are capable of coming forward in the first 5 year period (2012/13 to 2016/17).
 - iii. Discussions with CPNN developer partners has indicated completions at CPNN can be achieved at a faster rate than set out in the Council's RLS housing delivery forecast (Examination Library reference: EB5/2). A statement to this effect is contained in the CPNN SOCG (Examination Library reference SS28). The Council has reviewed these figures and considers given the progress that has been made with partners this higher level of completions is acceptable. This therefore provides a further 858 completions in the first five years than previously assumed by South Gloucestershire Council. This also includes an additional 100 dwellings in the control of Redrow Homes that were previously not included in the CPPN strategic allocation.

4.4 These three components total 1,858 dwellings and raise the total supply available in the first 5 years phasing period to 8,493. This represents 28% additional available supply based against CS15 provisions of 6,635. As explained in paragraph 4.2, the Plan does not seek to achieve annualised rates of delivery as this would be contrary to the Plan's overall vision and development strategy. Notwithstanding this, at 28% the need for any form of interim policy is removed, while also achieving compliance with the NPPF paragraph 47.

5.0 Definitions for 'non-strategic' and 'exceptional circumstances':

5.1 Opportunities for further delivery of housing will be provided through the Neighbourhood Planning Process and the Sites and Places DPD. At the EiP Session Matter 7 the Inspector requested that the Council provide definitions for 'non-strategic' and 'exceptional circumstances' which are referred to in the supporting text to policy CS5 in relation to amendments to the Green Belt boundary. This was with respect to the need to provide further clarification for users of the Plan.

Following consideration of these matters the Council has set out its response to these issues at **Appendices A and B** which include the necessary amendments to Policies CS5 and CS15.

RECOMMENDATION

5.1 The Council recommends that if the Inspector considers inadequate provision has been made for housing in the plan that he should recommend that policy CS15 contains a requirement to review housing numbers after 10 years of adoption of the Core Strategy. A proposed modification to Policy CS15 to achieve this objective is attached as **Appendix B**.

6.0 Process regarding main modifications proposed by the Inspector and actions leading to adoption of Core Strategy.

6.1 If the Inspector proposed that main modifications are required to the Core Strategy in order to make it sound then this could be undertaken by the following process:

1) Inspector publishes his draft/ preliminary conclusions containing his proposed main modifications

2) Council undertakes SA on the Inspector's proposed main modifications and prepares for public consultation

- 3) Council publishes and advertises proposed modifications and SA Report for consultation (six weeks)
- 4) Received responses compiled by the Council and passed to Inspector together with the SA for his consideration
- 5) Inspector considers whether there is a need to hold an examination session in light of the representations received and the SA Report produced.
- 6) Inspector having considered stage (5) above issues his final draft report to South Gloucestershire
- 7). South Gloucestershire undertakes a factual check on the Inspector's final draft Report
- 8). Inspector issues his final report
- 9). South Gloucestershire Full Council considers Inspector's report recommending adoption of Core Strategy
- 10). Formal adoption processes are undertaken in accordance with 2012 Plan Making Regulations.

Appendix A

Amended (clean) version of Policy CS5

POLICY CS5 – LOCATION OF DEVELOPMENT

In order to deliver the Strategy for Development, the framework for the location and scale of development is:

- 1. Most new development will take place within the communities of the North and East Fringes of Bristol urban area:**
 - The focus will be the development of existing commitments and the remaining South Gloucestershire Local Plan allocations, together with delivery of the Greater Bristol Bus Network, and the planning for the West of England transport package and future schemes; and**
 - New neighbourhoods of sustainable communities will be developed at Cribbs/Patchway and to the east of Harry Stoke**
- 2. At Yate/Chipping Sodbury, new development will be of a scale appropriate to achieve greater self-containment and to improve the separate but inter-related roles and functions of the towns, focusing on investment in the town centres and improving the range and type of jobs;**
 - Provided infrastructure, particularly sewerage infrastructure, is delivered, a new neighbourhood at north Yate will be developed, supported by a package of transport measures and a new local centre;**
- 3. At Thornbury, new development will be of a scale appropriate to revitalise the town centre and strengthen community services and facilities;**
- 4. The economic potential of Severnside will be realised as a strategic location for a range of employment uses, subject to the resolution of flood risk, environmental and infrastructure issues and taking into account the most recent government legislation and guidance;**
- 5. In the rural areas communities will be empowered to shape the future of their own local area through opportunities presented by Neighbourhood Planning.**

(a) Small scale development will take place within the defined settlement boundaries of villages defined on the Proposals Map, but will be limited in scale to no more than infilling within those villages with defined settlement boundaries washed over by the Green Belt. Small scale development within and well related to settlement boundaries may also come forward in accordance with criteria 7;

- **Defined settlement boundaries will be maintained around rural settlements for 5 years from the submission (March 2011) of the Core Strategy. A review of the approach to the distribution of housing in the rural areas will be undertaken which will include engagement with the local community and other stakeholders/parties;**
- **Any changes to the rural housing distribution will be reflected in the Policies, Sites and Places DPD;**

(b) In villages and other settlements without defined settlement boundaries development will be strictly controlled, but small scale development within or well related to villages or settlements may come forward through Neighbourhood Planning initiatives and rural housing exception site policy; and

(c) in the open countryside, new development will be strictly limited.

7. Non strategic changes to Green Belt boundaries to facilitate development for housing and other land uses will be delivered through the vehicles of Policies, Sites and Places DPD and or Neighbourhood Plans subject to the following criteria being demonstrated:

(a) Housing provision set out in Policy CS15 is demonstrated as not capable of coming forward taking account of any available contingencies and bringing sites forward from latter phasing periods; and

(b) it can be demonstrated that the purpose of retaining land in the Green Belt and the degree of significance attached to various parts of the Green Belt is outweighed by its release for housing, mixed use or employment development to support sustainable patterns of development; or

(c) Responds to the need to provide additional growth to meet any objectively assessed and evidence based need to address locally generated requirements identified by local communities through Neighbourhood Planning, parish plans / local housing needs surveys etc; or

(d) The need for minor adjustments to address anomalies e.g. where the current boundary does not follow readily recognisable boundaries using physical features in accordance with government policy;

And

(e) Any changes/proposals are commensurate with the locality in terms of its form, character and landscape and are cumulatively acceptable when considered with any other development (strategic and/or non strategic) identified in the Core Strategy, Policies Sites and Places DPD or Neighbourhood Plans.

Criteria (a) (b) (c) and (d) provide the exceptional circumstances justifying non strategic amendments to the Green Belt.

In non Green Belt locations the justification for and appropriateness of the release of land for non strategic development for residential and other forms of land uses is based on criteria (a), (c) and (e) above with the addition of:

(f) In rural areas small scale development only (considered to be up to 30 dwellings).

Development brought forward through a Community Right to Build Order is not inappropriate development in the Green Belt, provided it preserves the openness of the Green Belt and its purposes in accordance with Government policy and therefore no change is required to Green Belt boundaries.

No change to Green Belt boundaries are required for the delivery of Rural Exception sites under Policy CS19 in accordance with government policy.

The extent of the Green Belt will remain unchanged from that shown in the South Gloucestershire Local Plan, except to the east of Harry Stoke/Stoke Gifford (north of the A4174 Avon Ring Road), and to the west of the A4018 at Cribbs Causeway, where the need to: meet future housing requirements; ensure sustainable patterns of development; create and plan comprehensively for sustainable communities; are the exceptional circumstances in which land will be removed from the Green Belt at these locations. In addition, the visual impact of the proposed Stoke Gifford Transport Link on the openness of the Green Belt to the east of Harry Stoke/ Stoke Gifford (north of the A4174 Avon Ring Road) is also considered to provide an exceptional circumstance which justifies the release of this land from the Green Belt.

Following the development of these new neighbourhoods, the Council will examine the scope to extend Green Belt designation to other areas to compensate for this loss of Green Belt through a subsequent review

of the Core Strategy. Any development in the Green Belt will conform to national and LDF policies relating to the Green Belt.

The sequential and exceptions tests will be applied to direct development to areas with the lowest probability of flooding, taking account of the vulnerability of the type of development proposed, its contribution to creating sustainable communities and achieving the sustainable objectives of the Core Strategy.

- 6.5 The largest share of new development will take place within the North Fringe of the Bristol urban area, (incorporating land west of the A4018) which includes the new neighbourhood areas at Cribbs Causeway/Patchway, and on the edge of the North Fringe east of Harry Stoke, and at Emersons Green East in the East Fringe of the Bristol urban area. This represents places where essential infrastructure is in place or planned. This will reduce the need to travel and commute, accompanied by a package of public transport measures and supported by other community infrastructure. The boundaries of the North and East Fringes are shown on the Proposals Map.
- 6.6 Other than in two locations, east of Harry Stoke/Stoke Gifford (north of the A4174 Avon Ring Road) and to the west of the A4018 at Cribbs Causeway, the general extent of the Bristol and Bath Green Belt will be maintained as shown on the Policies Map. The exceptional circumstances identified by the Council, which justify the release of this land from the Green Belt, are the need to:
- meet future housing need;
 - ensure sustainable patterns of development;
 - create and plan comprehensively for sustainable communities.

In addition, in relation to the land east of Harry Stoke/Stoke Gifford (north of the A4174 Avon Ring Road), the visual impact of the proposed Stoke Gifford Transport Link on the openness of the Green Belt is also considered to provide an exceptional circumstance which justifies the release of this land from the Green Belt. Any non strategic amendments to the Green Belt, where exceptional circumstances can be justified, will be addressed in the Policies, Sites and Places DPD and/or through Neighbourhood Plans. The Council's Supplementary Planning Document (SPD) "Development in the Green Belt, June 2007" will remain and provide guidance, where it accords with the Green Belt policy in the NPPF, until such time as it is replaced and updated either through a new policy in the Policies Sites and Places DPD or by a refreshed SPD through the Local Development Scheme.

- 6.7 Outside the Bristol urban area, development land will be provided in Yate/ Chipping Sodbury and Thornbury, to promote greater self-containment of these settlements. This will include a new neighbourhood to the north of Yate.
- 6.8 In the rural areas communities will be empowered to shape the future of their own local area through opportunities presented by Neighbourhood Planning. Small scale development will be allowed in villages with defined settlement boundaries where it meets local housing needs or supports or enhances existing services and their viability. However where settlements with defined settlement boundaries are in the Green Belt then, to accord with government guidance, development will be limited to no more than infilling. Affordable housing modest in scale will be supported in accordance with Policy CS19 (Rural Housing Exception Sites), where there is identified need and local community support. A small element of market housing will be permitted

on such sites if it can be satisfactorily proved that this will facilitate the delivery of the local affordable housing need. Settlement boundaries are currently defined on the Policies Map for 37 villages. The defined settlement boundaries to villages will remain unchanged for five years from the submission (March 2011) of the Core Strategy, and during this time the Council will engage with local communities over the future approach to settlement boundaries as part of preparing the Policies, Sites and Places DPD. Any proposed changes will be identified in the Policies, Sites and Places DPD.

- 6.8a For the purposes of the Core Strategy non strategic development is potentially sites up to 499 dwellings. However, in reality this is more likely to focus on schemes up to 120 dwellings adjoining urban areas and normally not exceeding 30 dwellings in rural areas. This is a general statement and as such it is important to recognise that the scale of non strategic development (whether for residential development or for other land uses) appropriate at different locations will vary both in urban and rural locations. It is not necessary for the Core Strategy to identify the locations/ sites where non-strategic development could be provided. Instead this will be delivered through the vehicle of the Policies, Sites and Places DPD and or Neighbourhood Planning based on criteria 7 of Policy CS5. Based on the housing provision set out in Policy CS15 there is no need to provide non strategic sites.
- 6.9 The Severnside area is recognised as being a regionally significant employment area, covered by longstanding planning permissions, much of which remains undeveloped. Planning policy continues to support its development, while recognising the significant constraints that affect the area by way of flood risk, highway infrastructure, ecology and archaeology.
- 6.10 Government guidance requires that a sequential test relating to flood risk is applied to the identification of land for development, to ensure that there are no alternative sites available in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. Departures from this approach will only be justified in exceptional circumstances where it is necessary to meet the wider aims of sustainable development. The Council's Strategic Flood Risk Assessments have helped inform the Strategy for Development. This work indicates that the Strategy for Development can be delivered despite the flood risk issues by following a sequential approach in accordance with national policy. This approach will be used for allocating land in the Policies, Sites and Places DPD.
- 6.10i The areas surrounding the existing nuclear licensed sites at Oldbury and Berkley are covered by 'safeguarding zones' designated by the Office of Nuclear Regulation, as shown on the diagram at Appendix 8. HSE will be consulted on proposed development in these zones in accordance with their published procedures and practices. The implications of any proposed development will also be considered from an emergency planning perspective, and responses received would be a material consideration in determining planning applications. The promoters of the proposed new build site at Oldbury may also have an interest in seeking to ensure that any proposed development in the surrounding area does not compromise their ability to deliver on the National Policy Statement nomination of the site near Oldbury as being potentially suitable for a new nuclear power station.
- 6.10a Where major infrastructure projects are proposed, including the NPS identification of a site near Oldbury for a potential new nuclear power station, a potential new power station at Severnside and National Grid Connections, the Council will seek to work with the scheme promoters, statutory bodies and the community, to seek to ensure optimal benefits for the locality and to minimise social, economic and environmental impacts. The Council may have a dual role in respect of these developments, either as consultee to Development Consent Order Applications that are assessed

by the Planning Inspectorate and determined by the Secretary of State, or as consultee on applications that are determined by other statutory bodies such as the Environment Agency or the Marine Management Organisation, or as the determining authority for any applications for development associated with but not part of Development Consent Orders.

Delivery

- 6.11 The development will be delivered by the private sector through the LDF processes, development management process and by Neighbourhood Planning. More details on delivery are set out in the policies in Part 2 of the Core Strategy.

Appendix B – Amended (clean) version of Policy CS15

Distribution of Housing

POLICY CS15 - DISTRIBUTION OF HOUSING					
<p>Between 2006 and 2027, covering a period of 15 years from adoption of the Plan, a supply of deliverable and developable land will be identified to secure the delivery of a minimum of 26,855 new homes in accordance with the plan, monitor and manage approach and the location of development set out in Policy CS5. The distribution will be:</p>					
		2012/13- 2016/17 (5yrs)	2017/18- 2021/22 (5yrs)	2022/23 2026/27 (5yrs)	Total 2006- 2027
Completions 2006 – 2012					4,990
North & East Fringes of Bristol urban area	Existing Local Plan Allocations	3,750	3,520	25	7,295
	Potential housing sites, including infill development³	1,070	325	735	2,130
	New Neighbourhoods: • East of Harry Stoke¹ • Cribbs/Patchway	155	1,250	595	2,000
		235	1,520	3,945	5,700
Rest of South Glos	Potential housing sites including infill development³	905	185	450	1,540
	New Neighbourhood at Yate^{1, 2}	260	940	1,500	2,700
	Housing Opportunity at Thornbury	260	240	-	500
TOTAL excluding completions 2012 - 2027		6,635	7,980	7,250	21,865
TOTAL including completions 2006 - 2027					26,855⁴
<p>The appropriate level of new homes will be reviewed after 10 years from the adoption of the Core Strategy.</p>					

Footnote to Policy CS15

¹ Development of the new neighbourhoods at North Yate and Cribbs/Patchway is contingent on the delivery of major new strategic infrastructure to support sustainable communities subject to confirmation from delivery partners.

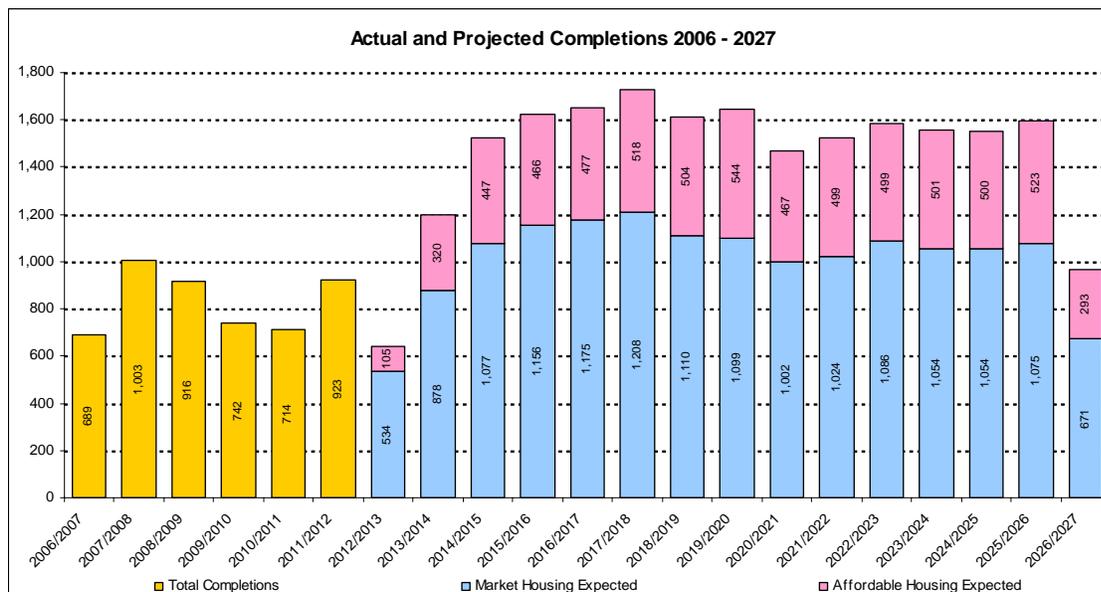
² Remainder of the 3000 dwellings capacity at Yate new neighbourhood to be delivered post 2027

³ Potential housing sites including infill development on sites that have planning permission (outline or full planning permission that has not been implemented), specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the first 5 year period of the Core Strategy. Small site windfalls expected to come forward from 2022 to 2027 included.

⁴ There is sufficient flexibility on top of the total housing figure in Policy CS15 to meet the 20% "buffer" identified in NPPF(para. 47) to provide up to 28,355 dwellings (See also paras. 10.6b and 10.6bi below).

- 10.5a The overall level of housing provision put forward in this Plan reflects the underlying spatial objectives, the sustainable development principles set out in Policy CS1 and the locational strategy set out in Policy CS5. In establishing the strategic housing provision, consideration has been given to the following factors that have shaped capacity:
- the relationship between projected local employment growth and housing to plan for prosperous local economies over the duration of the plan period;
 - putting into a local context the demographic drivers to housing demand;
 - protecting environmental assets and making the most effective use of developed land and buildings;
 - the physical, green and community infrastructure needed to support additional housing and the importance of its delivery through comprehensive and co-ordinated plan making;
 - providing a framework which takes a long term view to support the delivery of housing, for which there is likely to be genuine demand, but which is resilient and flexible to respond to rapidly changing circumstances; and
 - consistency with the underlying commitment to sustainable patterns of development across the area and the principles of localism.
- 10.6 Between 2006 and 2027 provision will be made for a minimum of 26,855 new dwellings, 4,990 of which have already been completed, this means providing 21,865 dwellings, between 2012 and 2027.
- 10.6a The Plan does not seek to achieve annualised rates of delivery over the 15 year plan period 2012 to 2027. Instead, this new housing will be delivered in accordance with the phasing set out in Policy CS15 together with the requirement for affordable housing set out in Policy CS18. The purpose of this is to provide practical steps to guide development and to identify broad timescales for the release of development to co-ordinate with infrastructure delivery in accordance with the locational strategy. The 'flexibility' in the provision also enables the Core Strategy to provide a 15 years supply of land at adoption. The following housing

trajectory demonstrates that there is a deliverable and adequate supply of both market and affordable housing available until 2027.



10.6b For the purposes of complying with Government policy to ensure sufficient flexibility is available to boost supply and respond to rapidly changing circumstances, the following is also factored into the first 5 year phasing period:

- iv. Making an allowance for windfall sites (small sites of 1-9 dwellings). This introduces a further 750 dwellings into the first 5 year period and a further 750 into the second phasing period taking overall supply up to 28,355. In total windfall sites from small site sources is expected to contribute 2,250 dwellings (at 150 per annum) over the period 2012 to 2027 (included in CS15 Table above).
- v. Reviewing the phasing arrangements for North Yate and Cribbs/Patchway New Neighbourhoods by bringing delivery forward from later phasing periods (250 dwellings brought forward North Yate and 858 dwellings brought forward Cribbs/Patchway).

10.6bi This additional flexibility raises the total supply available in the first 5 years phasing period to 8,493 (6,635 + 750 + 858 = 8,493). This results in 28% additional available supply based against CS15 provisions of 6,635 and thereby achieves compliance with the NPPF paragraph 47. It is important housing land supply is monitored in order to ensure that there remains a flexible supply of deliverable and developable land for housing. To achieve this, an annual report and supporting technical methodology will be prepared which will confirm the level of housing provision to be provided for the basis of the 5 year land supply in the context of paragraph 47 of the NPPF.

10.6bii At ten years from the adoption of the Core Strategy, the Council will review the appropriate level of new homes. It will examine all available evidence sources including demographic evidence, economic conditions and forecasts. If evidence suggests that additional provision of homes will be required the review will consider the appropriate response. If additional

strategic provision is required its delivery will be determined on a West of England-wide basis through the duty to cooperate.

- 10.6c Over 40% of this housing is accounted for through allocations in the South Gloucestershire Local Plan and planning permissions. At April 2012 there were outstanding planning permissions for around 5,680 dwellings and a further 4,180 dwellings on committed sites.
- 10.7 To supplement the existing permissions and commitments, the Core Strategy identifies 3 new neighbourhoods which will deliver 10,400 dwellings. In addition, a smaller development opportunity at Thornbury will provide a further 500 dwellings to support local housing needs over the next 15 years.
- 10.7a Over half of the dwellings to be provided in the new neighbourhoods will come forward in the Cribbs/Patchway New Neighbourhood, a significant proportion of which are expected with the anticipated closure, and subsequent release for development, of Filton Airfield. BAE Systems has announced its intentions in this respect. This level of development is justified in order to deliver a comprehensive and sustainable development in this area of the Bristol North Fringe, well integrated with the existing communities surrounding the area, and to secure the level of infrastructure investment required, particularly transport and education. However, should BAE Systems decide against releasing the Airfield for development, the Council will not seek to compensate with alternative housing provision elsewhere. Rather, the Council may consider the need to undertake an early review of the Core Strategy to respond to this change in circumstance should it arise.
- 10.8 This policy fulfils the requirement in national policy to enable a continuous delivery of housing for at least 15 years from the date of adoption, with sufficient specific deliverable sites to deliver housing for the first 5 years, the identification of a further supply of specific, developable sites for years 6-10 and where possible for years 11-15.
- (10.9 *whole paragraph previously deleted in SRC1 page 57*)
- 10.10 In recent years at least 60% of housing development in South Gloucestershire has taken place on previously developed land. Many of the committed sites are also on previously developed land. However, because of the level of housing growth which South Gloucestershire has to accommodate up to 2027, increasingly new housing development will have to be on greenfield sites, as there is a declining amount of brownfield land available in sustainable locations. These greenfield sites support the Core Strategy's Strategy for Development and will help in delivering the longer term vision for the West of England.

Delivery

- 10.11 This policy will be delivered through the development management process by private developers and affordable housing providers approved by the Council. Policies CS26, CS27 and CS31 provide detailed guidance on the new neighbourhoods at Cribbs Causeway, East of Harry Stoke and north Yate. South Gloucestershire Local Plan Policy M2 sets out detailed requirements for the major development at Emersons Green.