1. This supplementary statement has been prepared in response to SGC’s Housing Provision Options Paper (CE8) which is the subject of discussion at the Examination on the 18th July 2012.

2. Heron Land Developments Ltd (HLD) agrees with the Council that establishing an up-to-date Development Plan for South Gloucestershire is especially important. Neither the Local Plan, Structure Plan, nor RPG10, are up to date. They do not provide a planning policy framework that addresses, through land allocations, current and future development needs. Given the existing scale of local and strategic development needs that exist, the urgency with which the Core Strategy should be put in place cannot be overstated. This would provide up-to-date the policies and proposals to guide future development.

3. To delay, or worse still, abandon the current Core Strategy, would have particularly harmful effects, removing the practical framework within which decisions on planning applications can be made. In the particular circumstances of South Gloucestershire, these considerations outweigh the acknowledged desirability in an ideal world of having a Core Strategy that addresses these matters fully at the outset.

4. Simply to forsake the current Core Strategy in order to consider higher levels of housing would not increase delivery further in the short to medium term. Such an approach would be counter-productive as the Council would, absent a confirmed planning policy framework, have to wrestle with the technical and political implications of additional land allocations, rather than progressing expeditiously what is presently identified in the Core Strategy as deliverable and wholly appropriate. This would be at odds with the underlying tenets of the NPPF and the Planning for Growth agenda both of which seek to improve with alacrity the delivery of development that is sustainable, so far as possible within the parameters of a plan-led system. Any need to increase housing supply in the longer term should not
diminish the opportunity to “significantly boost” housing supply offered through the Core Strategy in its present form.

5. Therefore, if it were considered necessary to increase housing supply, HLD believe this is best achieved through a review of the Plan (option 2). This would, in the first instance, establish an up to date policy framework, underpinning the principles of the spatial strategy identified by the Council. Similarly this would allow the New Neighbourhood proposals, which are central to delivery of the overall strategy and its housing and employment requirements as presently defined, to be brought forward with a high degree of predictability and efficiency. This would also ensure the timely delivery of strategic infrastructure associated with these development proposals that contribute a wider benefit, across existing settlements and in certain instances the City Region. It would be wrong to deny the clear and obvious advantage of this opportunity, notwithstanding the potential need to increase housing provision across the plan period as a whole.

6. Thereafter, the increase in housing supply can be achieved in the medium and long term having regard to evidence that exists at the time of a review.

7. This said, HLD are concerned that the date of the suggested review (2021) is not appropriate. The lead-in time means that it would be both necessary and desirable for such a review to be commenced shortly after adoption of the Core Strategy, which, allowing for a reasonable timescale for its preparation, would be completed by 2016. On this basis the required increase in housing supply would be achieved from 2018 onwards. This would better contribute to a required increase in housing supply over the remaining plan period and beyond.

*Boyer Planning Limited*

*July 2012*