

## **Preliminary Findings: South Gloucestershire Core Strategy**

1. The following commentary summarises my preliminary findings on the South Gloucestershire Core Strategy (CS) and which provide the context for the main modifications I consider are necessary to make the Plan sound.
2. As explained in my letter to the Council on 1<sup>st</sup> February 2012 [SG15]<sup>1</sup> my draft modifications are made in response to the Submitted CS of 31<sup>st</sup> March 2011 [SD10] and the further changes identified for my consideration by the Council and contained in the Core Strategy incorporating Post-Submission Changes, December 2011 [PS2] document. In response to representations received during the examination process the Council produced a list of 'rolling changes' for my further consideration. These can be found in document SRC3. I have had regard to these and the various supporting documents in my assessment of the CS.
3. The Localism Act 2011 introduced a 'duty to cooperate' for plans submitted after 15 November 2011 when the provision came into force. I indicated in my letter of 1<sup>st</sup> February that the legislation could not be applied retrospectively. Nevertheless, this was a matter discussed during the examination hearings. I have concluded that the 'duty' does not apply to this Plan and cannot be relied upon in support of a representation made in relation to the Cribbs Causeway retail area. However, for other reasons I have concluded that the changes recommended by the Council in SRC3 with respect to the Cribbs Causeway area should not be made – see paragraph 10.

### General

4. I was encouraged by the considerable commitment to the plan-making process which was evident through the representations to the CS, the responses of the Council and the on-going effort by the various parties to continue to work constructively to address the differences between them.
5. I suspended the examination process in 2011 because of concerns I had in relation to the provision of housing, the Council's approach to the Green Belt and the consequences of the proposed closure of Filton Airfield which was announced shortly after the CS was submitted. The Council sought to address these matters and move the Plan forward making sufficient progress so that I felt able to continue with the examination process.
6. Having reviewed the body of evidence and submissions I have concluded that the Plan as presented is unsound but is capable of being made sound providing a number of modifications are made. The majority of modifications have been suggested by the Council. A small number of main modifications are also required to overcome concerns which I do not believe have been fully or adequately addressed.

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<sup>1</sup> This and similarly referenced documents can be found in the Examination Library

### Key Matters

7. There was considerable debate at the hearings on appropriate levels of housing and whether the Council was able to demonstrate a 5 year housing land supply. The Council has increased provision but I am not certain that this will be adequate. However, my doubts are tempered by the prolonged recession, borrowing difficulties and the confidence of purchasers to generate the level of demand associated with higher levels of provision. On balance, I have concluded that there is sufficient evidence to suggest the majority of needs can be met and that any residual demand can be delivered by other mechanisms but the Council will need to undertake further work to identify an adequate housing land supply.

8. I am unconvinced by the Council's approach to its Green Belt (GB). I appreciate that there are parts of the District where alterations to boundaries would be inappropriate but I consider the Council has not looked in sufficient detail at its GB areas. As a result it has failed to seize the opportunity to adjust boundaries where the impact on GB purposes would be limited. Previous Planning Policy Guidance indicated the plan making process was an appropriate vehicle for considering such changes and this remains the case following the introduction of the National Planning Policy Framework (NPPF).

9. The Council has recognised the potential of Filton Airfield as an integral part of its proposals for the future development of the North Fringe areas of Bristol. There is a strong body of local opposition to the loss of the airfield but retaining it in its current use would necessitate significant extensions to free-standing settlements and major intrusions into the countryside, including the Green Belt, if the Plan were to be sound. Alternatively, the airfield can make a significant contribution towards satisfying development pressures and assist in delivering a coherent strategy for the North Fringe.

10. I consider the Council's proposals for the expansion of the Cribbs Causeway/The Mall retail areas are premature. The basis for expanding a major shopping destination has not been sufficiently justified. It raises concerns that further substantial growth would have significant repercussions for other centres in the sub-region. The implications of the proposed changes need to be fully explored, in conjunction with other operators and local authorities, prior to any decision on the long-term role of this area in the shopping hierarchy.

### The Way Forward

11. It was evident that a majority of those taking part in the hearings were of the opinion that deficiencies in the Plan should be addressed in preference to a finding of unsoundness. I concur with that view. I see no benefit in rejecting the Plan in its entirety because it would hinder the development process, compromise commitments to infrastructure improvements and increase the likelihood of 'planning by appeal'.

12. I have considered the options for moving the Plan forward and I have concluded there would be little benefit in proposing a second suspension of the examination process. This would lead to further delay and uncertainty when the emphasis should be on delivering new housing and employment and encouraging investment.

13. Instead a review of the CS would enable the Council to have regard to post-recessionary effects and address any longer-term deficiencies in housing supply. It would also allow for a reassessment of the GB and the potential contribution that could be made by adjusting boundaries to help create suitable sites for use, either during the remainder of the current plan period or in the longer term.

#### Proposed Modifications

14. I have set out a number of draft main modifications in Appendix A. These are based on the changes suggested by the Council in document SRC3 and referenced to the Post-Submission Changes version of the Core Strategy, December 2011. The Council may however, wish to consider publishing each version of the relevant text of the CS to provide a full 'audit trail' of each succeeding change it has put forward for my consideration. It should be noted that in a number of cases I have combined changes to the supporting text with policy alterations. In some instances the changes are set out in appendices to make it easier to appreciate the overall policy.

15. The main changes I am currently proposing are:

1. a revision to policy CS5 particularly in relation to the interpretation of 'non-strategic' development;
2. alterations to policy CS14 to identify the Cribbs Causeway/Mall retail area as an out-of-centre location where further work is necessary to justify any significant expansion of this area;
3. revisions to policy CS15 and alterations to the amount and phasing of housing development;
4. reference in the supporting text to policy CS15 to the need for an Interim Housing Statement to address deficiencies in the 5 year housing land supply;
5. reference in the supporting text to policy CS15 for the need to review the CS having regard to the provision of housing and the requirement for the Council to carry out a comprehensive and detailed review of its GB boundaries. Ideally this should be done in conjunction with the adjacent West of England authorities because of the interrelationship between them and need for a coordinated strategy to deliver a sound and coherent development framework for the longer term;
6. Adjustments to new neighbourhood policies to ensure alignment with other changes;
7. Revisions to the sections covering Severnside and Major Infrastructure Projects.

16. Other changes have made to ensure compliance with the NPPF and to clarify matters of detail. In summary these include:

- a) regard to had for the viability of development proposals in relation to renewable energy provision, affordable housing and other areas where developer contributions could be sought;
- b) clarification of the approach to safeguarded employment sites;
- c) acknowledgement of the role of neighbourhood planning in bringing forward local initiatives e.g. local needs development;
- d) more flexibility in the delivery of new neighbourhood areas through earlier commencement of development;
- e) Where necessary, adjustments to other policies to ensure compatibility with the main modifications;
- f) consequential changes to diagrams, supporting text and the Policies Map (replacing the Proposals Map).

17. The main modifications will be published by the Council for the purposes of public consultation together with changes arising from any further sustainability appraisal which may be necessary in light of the proposed modifications. I will have regard to the outcome of this consultation process before finalising my report, including the final main modifications, I recommend to the Council.

Paul Crysell  
Inspector  
10 September 2012