Dear Mr Crysell,

South Gloucestershire Council Response to Inspector’s Preliminary Findings and draft Main Modifications

I write further to your preliminary findings and draft Main Modifications which were published for public consultation between 4 October and 16 November 2012. South Gloucestershire Council has very carefully considered your preliminary findings and make the following comments in its consultation response.

Firstly the council welcomes your findings that the Core Strategy is capable of being found sound subject to additional Main Modifications in particular South Gloucestershire Council welcomes your overall findings with regard to:

- Your support for the council’s proposals which will see a minimum of 23,355 dwellings delivered over the next 15 years (this is the highest rate of delivery of any of the 4 UAs in the West of England).
- Your rejection of calls for a second suspension to the examination process or for the council to withdraw the Core Strategy and start again due to any regularity or procedural issues regarding its preparation.
- The confirmation of the two strategic releases of land from the Green Belt to facilitate the delivery of over 3,000 new homes.
- Your support for no additional major strategic releases of land from the Green Belt until a plan review is completed by 2021 and that this review of Green Belt be undertaken working with the other West of England authorities.
- The establishment through the Core Strategy of an employment land portfolio of 350 hectares of land available for new employment development that is capable of supporting the West of England Local Enterprise Partnership’s ambitions for South Gloucestershire up to 2031. This includes 3 of the 5 Enterprise Areas in the West of England.
- The provision of a planning policy framework that supports the delivery of the £50m North Fringe-Hengrove transportation package approved by DfT and sets the future context for the City Region Deal and Infrastructure delivery.
- Your support for the Plan’s locational strategy and commitment to a strong urban focus with new major strategic development allocations located at the Bristol North Fringe including the future redevelopment of Filton Airfield, Yate and Thornbury.

Steve Evans  
Director of Environment and Community Services  
South Gloucestershire Council, PO Box 2081, South Gloucestershire, BS35 9BP  
Telephone: 01454 863469, Fax: 01454 863116. Email: planningLDF@southglos.gov.uk
• Your support for the council’s approach to working with local communities through the vehicle of the Policies, Sites and Places DPD/ Neighbourhood Planning to take forward a rural housing strategy incorporating a review of settlement boundaries to identify opportunities for non-strategic/ community led growth.
• Your support for the need to ensure that the new neighbourhoods be delivered in a comprehensive manner through the council’s SPD/ Master Planning process.
• The endorsement that the general ‘core’ non spatial policies are sound – subject to some further modifications.
• Your support for the council’s approach to working with the Infrastructure Planning Commission and major infrastructure providers.

Secondly, the council welcomes and supports the following draft Main Modifications that it considers improves the clarity of the Core Strategy:
MM1, MM2, MM4, MM5, MM6, MM8, MM9, MM10, MM12, MM13, MM16, MM17, MM18, MM20, MM21, MM24, MM25, MM26, MM27, and MM28

Thirdly, notwithstanding the above, the council has a number of objections that it would like to formally raise in respect of the following draft Main Modifications:

In particular the council has very strong objections to your proposed Main Modification MM15.

Please find enclosed separate representations on each of these Main Modifications that clearly set out the council’s objections to these draft Main Modifications.

In additional to the above points the council wishes to draw your attention to two further modifications, presented as a separate note following the council’s representations. The council does not consider these to be ‘Main Modifications’ and subject to your agreement, proposes to deal with these as ‘additional modifications’. These modifications relate to the amendment of the Thornbury settlement boundary and the correction of a formatting error.

Summary
The council has given full and careful consideration to the potential changes to the Core Strategy as a result of the draft Main Modifications. We have set out our key concerns, the reasons for these and steps that should be taken to address them. The council respectfully asks that you take these comments into consideration before you finalise your Report. If the council can be of any further assistance to you in completing any remaining stages of the examination process we would be very happy to assist in any capacity you require.

Yours sincerely

[Signature]

Patrick Conroy
Strategic Planning Policy and Specialist Advice Team Manager
MM3 in relation to Policy CS1

The council welcomes the changes you have made that largely reflect the suggested changes set out in SRC3 (ref: 5). However, it is noted that the word ‘requirement’ to meet Code for Sustainable Homes (CfSH) level 3 has been replaced in favour of ‘encouraging’ developers to meet this standard.

The council would ask you to reconsider this as it represents a weakening of the policy and undermines the council’s commitment to sustainable construction standards and their importance in ensuring a positive and enduring legacy for future generations. The council also considers that this change is not consistent with the approach taken by the Inspector conducting the public examination of West Berkshire Council’s Core Strategy (3 July 2012), who states:

“131 Policy CS16 Sustainable Construction and Energy Efficiency. Following the hearings in November 2010, I requested that the Council consult on a change to this policy to delete the requirements relating to the Code for Sustainable Homes (CfSH) and BREEAM. This was because I was not satisfied that these requirements were justified in relation to then national policy in the Supplement to PPS1 (December 2007) particularly paragraphs 30-32. That Supplement has been replaced by the NPPF.

132 The NPPF requires (paragraphs 94 - 95) local authorities to adopt proactive strategies to mitigate and adapt to climate change. When setting any local requirements for a building’s sustainability they should do so in a way consistent with the Government’s zero carbon policy and to adopt national standards. The particular tests for the justification of such local standards previously in the Supplement have been dropped. The NPPF does however require (paragraph 21) investment not to be overburdened by the combined requirements of planning policy expectations.

133 The requirements in CS16 refer to nationally described standards consistent with the Government’s zero carbon policy. There is an additional administrative cost burden in providing the supporting evidence at application stage and subsequently demonstrating compliance with such a policy. The energy efficiency levels required by the Code are currently planned to be achieved by further tightening of the Building Regulations to 2016. Meeting these energy levels represents the most significant aspects of meeting the Code in construction terms. As the Council is not proposing any acceleration of this element compared with what is likely to be required under the Building Regulations, the additional cost burden of the Council’s policy is unlikely to be substantial.”

Policy CS1 is similarly consistent with the Government’s zero carbon policy and does not propose any acceleration of the energy element over the building regulations thereby any additional financial burden is unlikely to be substantial.
MM7 in relation to Policy CS5 - Non Strategic Changes to the Green Belt and rural locations

At the EIP you encouraged the council to suggest changes to the Core Strategy that would support the delivery of some non-strategic growth over the Plan period. While no ‘targets’ for this have been introduced, draft changes to the plan now make provision to permit residential developments of up to 30 dwelling in rural areas including both Green Belt and non-Green Belt locations. The vehicle for this delivery and for non-strategic amendments to Green Belt and settlement boundaries will be through the council’s Policies, Sites and Places DPD or Neighbourhood Plans.

As a matter of principle the council broadly supports this approach. The Council however, feels that in combination with the potential impacts regarding housing numbers set out in MM15, the proposals as currently set out could lead to speculative development eroding the integrity of the Green Belt and/or development being promoted in unsustainable locations which would be entirely contrary to the Plan’s strategy – either individually or cumulatively.

The council is working closely with local communities to encourage the take up of the Government’s commitment to genuine bottom-up community-led planning. The council is pleased you have supported this initiative and that you have agreed with the council that the necessary hooks should be provided in the Core Strategy to facilitate this approach while ensuring that the necessary safeguards are in place – such as having to demonstrate exceptional circumstances in relation to future amendments to the Green Belt.

Notwithstanding the above, the council feels that the changes introduced at the Examination to CS5 that were aimed at clarifying the approach to addressing non strategic development and non-strategic amendments to the Green Belt boundaries have resulted in some ambiguities and inconsistencies within the policy. The council therefore feels that Policy CS5 would benefit from some minor redrafting and presents a revised version of CS5 for your consideration at Appendix A. These revisions are intended to:

1) reflect the location specific approach used in earlier versions of the policy particularly with regard to villages and smaller settlements.
2) clarify the approach to development in the Green Belt by location
3) separate out the text that relates to Green Belt boundaries
4) clarify the policy in respect of rural settlements
5) be explicit about development elsewhere in the rural areas
6) clarify development within and outside settlement boundaries
MM11 in relation to Policy CS8 and paragraph 7.21

The council welcomes the changes you have made, which largely reflect the suggested changes set out in SRC3 (Ref: 30 – 34). However, it is noted the words ‘required to provide’ have been deleted in favour of ‘encouraged to’. While it is recognised this brings the Policy in line with the NPPF (para 30), the council asks you to reconsider this as it represents a weakening of the policy.

The council is also concerned that the proposed changes to CS8 will leave a transport policy vacuum gap in the day-to-day consideration of planning applications when assessing highway safety issues. It has been proposed that Policy T12 of the SGLP will fall away upon adoption of the Core Strategy (through its inclusion Appendix 2 (Replaced Local Plan Policies) in the Core Strategy) but the council feels that this, in combination with changes proposed through MM11, will result in a policy gap for Development Management purposes until the adoption of the proposed Policies, Sites and Places DPD. The NPPF is quite limited in terms of transportation advice and will not adequately fill the policy gap created. The Framework states “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of the development are severe” (para 32). Whilst the NPPF and CS8 address the issue of parking, there does not appear to be any express consideration of the impact on highway safety. The council therefore asks you to give consideration to:

1. The inclusion of a further Main Modification that deletes Policy T12 from Appendix 2 of the Core Strategy, therefore retaining the policy in the development plan until it is reviewed through the process of bringing forward the Policies, Sites and Places DPD.

Or

2. The inclusion of a further Main Modification that amends policy CS8 (1) to read:
   ‘…Developments which are car dependant, promote unsustainable travel behaviour or unacceptable impact on highway and pedestrian safety will not be supported’.

And/or

3. The inclusion of a further Main Modification that introduces the following text to the end of paragraph 7.16:
   ‘…National policy (NPPF para 32) also states that, “development should only be prevented or refused on transport grounds where the residual cumulative impacts of the development are severe”. In this context it is considered that the impacts of development include local pedestrian, cyclist and vehicular highway safety and traffic congestion’.
Page intentionally left blank
MM14 in relation to Policy CS14 and cross referenced changes resulting in MM22

The council welcomes your approach, in so far as you give conditional support to the principle of further growth at The Mall.

The council welcomes the clarity you provide in indicating that the implications of growth at The Mall should be further explored with other operators and Local Authorities and that the vehicle to do this is through the Policies, Sites & Places DPD where the Duty to Cooperate would need to be complied with.

The council welcomes your recognition that the provision of 34,000 sqm of new comparison floorspace is required within the district by 2026 to meet the needs of South Gloucestershire residents.

Notwithstanding this, the council would make the following detailed comments:

The Roger Tym and Partners Town Centre & Retail Study (Examination Library Ref: EB32-34) that forms part of the Core Strategy’s evidence base, recognised that there is neither the physical nor market capacity in the existing town centres in South Gloucestershire to accommodate the full extent of the level of floorspace growth required to meet the needs of residents and consequently recommended that a substantial proportion of this floorspace should be accommodated at Cribbs Causeway. The council considers this evidence base to remain robust and relevant.

The council however, considers that the draft Main Modification to policy CS14 appears to place an expectation that the floorspace growth will solely be directed to support the vitality and viability of existing centres in South Gloucestershire which they are actually not capable of accommodating. Moreover, this approach appears to be at odds with paragraph 9.26 which the council considers better reflects your intention regarding the Mall.

If left unaltered the consequential impact of this is that there is a strong likelihood of pressure for retail growth coming forward in out-of centre locations and / or resulting in the role and/ function of district centres being exaggerated. As a way forward the council requests that you amend Policy CS14 along the lines of paragraph 9.26.

The Inspector is also asked to consider reinstating the words in Policies CS14 and CS26 transposing the council’s vision and transformational agenda for Cribbs/ Mall into the policy framework. Notwithstanding your guidance on the approach to be taken to review and bring forward additional growth at the Mall, the loss of these criteria from Policy CS14 and CS26 in their entirety is disproportionately harmful to the role and function of the Plan – as without reinstating these references, the longer term place making ambition and driver of change at Cribbs Causeway/ The Mall is lost from the Core Strategy. The council therefore requests that you reinstate the council’s commitment to the Core Strategy’s vision and associated transformational agenda for Cribbs Causeway/ The Mall into the policy framework, while accepting that there is a need to plan for any future land use change as set out MM14.
The council opposes the deletion of Table 3a from the supporting text to Policy CS14. The inclusion of this table while having limited policy status is nevertheless helpful in informing the user of the Plan of the council's position at least with regard to the order of scale in the growth of each centre. Comments set out above support this position and by reinstating the Table, the council will be able to provide some context and certainty to help bridge the transition from the Core Strategy to the Policies, Sites and Paces DPD. You are therefore asked to reconsider your draft Main Modification proposal to delete the indicative distribution shown in Table 3a as amended at the EiP (as set out in SRC3, ref: 94).
MM15 in relation to Policy CS15 - Approach to housing numbers including phasing and delivery.

The council most strongly objects to amendments you have made to the version of Policy CS15 that we presented at the hearing session of the EIP. It is considered that the council’s approach to calculating housing delivery in CS15 is based on ambitious but realistic phasing across three 5 year periods. This is consistent with the Plan’s overall vision and spatial strategy, it is compliant with the NPPF, including paragraph 47, and with the statutory procedures for establishing the strategic housing requirement through the development plan system. Moreover, the levels of housing provision for the first 5 years at 8493 / 1700 per annum contained in the council’s version of CS15 achieved the right balance between demonstrating that the council was committed to sustainable plan led growth to support the economic recovery, while not excessively over stating supply.

This achieved the twin objectives of ensuring, firstly, that development did not take place in unsustainable locations and, secondly, given current economic and housing market conditions, that the housing delivery rates were set at a demonstrably realistic and achievable level, particularly in the early phase of the plan. This is necessary to minimise the risk that housing delivery by developers with policy compliant/ allocated sites is slower than that expected against the council’s 5 year supply, leading to a situation where an early opportunity would be provided for challenges to be made by those promoting non policy compliant housing sites. It is therefore wholly unacceptable to the council that through the changes you are proposing, we now face a situation where the council is presented with a housing delivery target in the first 5 years of the Plan of 9,345 dwellings/ 1870pa, a rate which greatly exceeds our assessment of the market’s ability to achieve. The consequence of this will be that the council’s and community’s hard-fought plan-led approach risks being immediately threatened by virtue of paragraph 47 of the NPPF as soon as these rates of supply are not achieved. To be faced with this position at such a late stage in the plan-making process is a highly unsatisfactory outcome, not only for the council and our communities but, it must be said, one that also strikes against the credibility of the whole process to which the council and the communities of South Gloucestershire have committed in good faith.

These fundamental concerns must be addressed in full by you in your final Report to give reassurance that Policy CS15 is evidentially based, effective and fully justified. You will need to show that the council’s and community’s commitment to a plan-led approach, and the responsible approach that has been taken, including the locally difficult decisions that have been taken, have not been misplaced. Your final decision in this regard must not increase the risk that after all this time and effort a route is provided to enable the plan to be lightly laid to one side, its fate wholly left to the vagaries of the market.

We set out our concerns regarding Policy CS15 in more detail below.

It is the council’s understanding that the proposed replacement of the council’s phased delivery with an annualised / equalisation approach increases the housing target in the first five years of the plan to 9,345 dwellings/ 1870pa and creates a housing shortfall in the first five years of 852 dwellings. To meet this shortfall in the first 5 years your proposed changes
to paragraph 10.6a require the council to produce an Interim Housing Statement (IHS) to either bring forward sites from later in the plan period or to identify new sites. The council’s objections to these proposed Main Modifications are as follows:

1. The council does not accept that in the first five year period Policy CS15 fails to deliver sufficient housing supply and / or fails to fully reflect current Government policy to provide more flexibility in housing land supply. The council does not consider that there is any evidence to the contrary, in fact in the light of the economic situation, the growth levels are extremely challenging.

2. The delivery through Policy CS15 of 8,493 additional dwellings is equal to an annual rate of 1700 homes per annum, which is higher than the Regional Strategy (Secretary of State’s version) figure of 1640pa. This annual level of development has not been achieved in South Gloucestershire in the past 20 years, despite the availability of sites and significantly better economic conditions.

3. The council’s phased approach is evidentially based on timescale for delivery and completions.

4. Given that your draft proposed Main Modifications have not advocated a dispersed settlement strategy and given the fact that 8,493 dwellings represents a considerable supply of new homes, in light of the current weakness in demand and economic and mortgage lending conditions, the council considers that there is no evidence that the proposed Main Modifications to CS15 are justified in any way. Further the draft Main Modifications are unsound and contrary to the NPPF and the plan-led system as they are likely to lead to planning by appeal, thereby undermining the whole basis for having a Core Strategy.

5. The position that this proposed modification puts the council in is wholly unsatisfactory. We are concerned that the introduction at this late stage of an additional requirement to find further site(s) for housing, and / or to agree to a mechanism for finding such sites through a non-statutory process, presents a significant challenge to the council’s faith in the Core Strategy process. It also potentially delivers a significant blow to the council’s credibility in the eyes of the local community as being an effective leader in setting the strategic planning framework for the area.

Notwithstanding the above fundamental objections, the council has reviewed all sources of additional supply that it considers are capable of being delivered in the next five years, and has concluded that some 594 dwellings are capable of being added to the available supply in the first 5 years. The evidence for the identification of this additional supply of housing land provision is set out in Appendix B. This additional supply has been evidentially tested; the list only includes sites of 10 or more units which have not previously been considered in the first 5 years. As a result, there are no double-counting issues in respect of the justified small site windfall allowance, as these take account of sites of 1-9 units in size. This would enable the total figure for the first five years of CS15 to be amended to 9,087. The council considers that this is more than adequate to provide a first five year phase of housing supply including a 23% buffer. We therefore strongly recommend that a Main Modification to reflect this is incorporated into the Core Strategy.

The council has worked extremely hard with its communities, key stakeholders and partners to prepare a Core Strategy that reflects and balances the key issues and challenges facing
the District. The Council has demonstrated its commitment to work with its communities throughout the EIP process. The Core Strategy is delivering high growth in sustainable locations while balancing environmental and quality of life considerations. In essence we consider it has achieved the objectives of bringing together economic, social and environmental considerations within the context of Government policy as set out in the NPPF. We are therefore most concerned and strongly object to additional development that, from the council’s and our communities’ perspectives, would go beyond what are considered to be acceptable and sustainable limits. Such development would potentially lead to a distortion of the Plan’s locational strategy, by seeing the market prioritise housing in less sustainable locations, at the expense of the demonstrably sustainable locations identified in the Plan.

In addition, the council is able to further advise you that we are confident that, through our own estate disposal programme and through a review being carried out by Merlin Housing Association of its property assets, a considerable number of additional, suitable, residential developments will be deliverable in the next 5 years. Given the ownership of these sites, there must be considerable certainty that they can be delivered, and that they will make a further contribution to housing supply, especially to market segments not well served by the private sector e.g. affordable housing. Following due process for site disposals, the council is confident that additional suitable sites will come forward through, and be publically available, in a forthcoming review of the SHLAA in April 2013. Furthermore, additional residential development will also come forward through the council’s commitment to locally determined, bottom-up mechanisms (the Policies, Sites and Places DPD and Neighbourhood Plans) set out in the proposed modified Policy CS5.

You are therefore requested to amend your Main Modifications to reinstate the phased approach to Policy CS15. To help support this, the council has identified additional supply in the first 5 year period of 594 dwellings – some 70% of your identified shortfall. As a result, the council is recommending that 7,385 homes – boosted to 9,087 when the requirement to included a 20% buffer is taken into account (equivalent to an annual rate of 1820) is the delivery target and basis for establishing the council’s 5 year land supply. This we consider more than adequately addresses any concerns you may have had regarding the level of housing supply in the first 5 years of the Plan, while recognising the need to ensure the council can sustainably and effectively manage its land supply requirements through the vehicle of the Core Strategy as the council’s Local Plan consistent with the NPPF and the Government’s commitment to the plan led system. A revised policy is presented at Appendix C.

However, if and only if, you are unwilling to agree to these modifications and remain of the view that some additional housing still needs to be provided in the first five year period, then the council considers that, in order for the Core Strategy to be sound and compliant with the NPPF, any shortfall must be addressed through the plan making process and not outside it via an Interim Housing Statement (IHS). In short the council is entirely and completely opposed to the draft proposed Main Modification that the provision of additional housing should be through the production of an Interim Housing Statement (IHS) and this proposal should be removed from the Main Modifications. The council’s reasons for this objection are as follows:
1. The council has very strong concerns about the merits, practicalities and implications of undertaking the production of an IHS. The council considers that, having fully committed considerable time and resources to bringing its Core Strategy forward to ensure development will take place in a plan-led and certain environment, it is unacceptable to then require that additional housing should be ascertained through or left to the vagaries and uncertainties of a non-statutory process.

2. An IHS does not have the status of a development plan or neighbourhood plan and there is no requirement for it to be subject to due process/examination. While the council could undertake consultation and SA as required, its legitimacy and basis for identifying land allocations is extremely uncertain given there is no reference to this as a process for plan making in the NPPF or legislation. The final arbitrator in the event of sites coming forward that are not in conformity with the council’s Local Plan would be the development management and/or appeal process.

3. The council would need to commit further resources for an IHS to come forward. The production of an IHS would result in a further delay before the full extent of the policy framework for delivering development in a plan-led way was established. The council also has concerns about the likelihood of appeals, whilst the IHS was in preparation, and/or legal challenges arising from the adoption of an IHS creating further uncertainty and risk of planning-by-appeal.

4. The council considers that the Core Strategy process itself and the role of the inspector, is to ensure that the housing need for the plan period is identified and met, through the allocation of sites and/or criteria to meet that requirement. The council does not consider that the Core Strategy can be found sound by deferring a key requirement to be fulfilled, by the production of yet another document, through a non-statutory process yet to be determined.

5. Furthermore, it is wholly unclear how an IHS yet to be produced can address the need to ensure that in the first 5 years there are developable and deliverable sites specifically identified as per para 47 of the NPPF.

6. The likelihood is that whilst an IHS is under preparation there would be planning-by-appeal, which could lead to residential development in open countryside in demonstrably unsustainable locations, which would negatively impact on local communities and SA objectives.

7. The use of an IHS is neither sound nor in accordance with the National Planning Policy Framework (NPPF), which advises that:

   i. In accordance with section 38(6), decisions on planning applications must be made in accordance with the Development Plan…(section38(6)) (NPPF – Para 2 & 150). It is unclear how an IHS would fit into this process;

   ii. Decision making should, be genuinely plan-led… (NPPF – Para 17- Bullet Point 1).
iii. Furthermore, in Para 153 the NPPF sets out the role and purpose of a Local Plan – an IHS sits outside of this and is clearly something that is not supported, as additional DPDs should only be used where clearly justified. In any event the IHS would not be a DPD but outside that process. At Para 153 it states that it is Local Plans that should set out what homes are needed in an area not an IHS.

The council therefore considers that you, as the appointed Inspector, are tasked with making this Development Plan sound, where it is capable of being made so. Through your proposed introduction of draft Main Modifications to Policy CS15 a shortfall of 852 units in the first five years has been created, and this shortfall needs to be addressed through the Core Strategy process not outside it.

The council’s position is, therefore, that if Policy CS15 is to be modified as proposed, then the appropriateness of the IHS as the mechanism to resolve the housing shortfall is wholly and completely unacceptable on technical, procedural and legal grounds. The shortfall created by your proposed modifications would need to be resolved within, not outside, the Core Strategy process. You are therefore asked to remove reference to the IHS from your Main Modifications.

If you remain un-persuaded that the council’s proposed amendments to Policy CS15, which are contained in Appendix C, do not make the Core Strategy sound then the council, very reluctantly and mindful of the considerable risk to the credibility of the Core Strategy process that your proposed modifications create, considers that the remaining shortfall of 260\(^1\) units must be addressed in the following way:

- That the Core Strategy process is used to allocate sites if it is to be found sound; and
- That it is your duty to allocate a site or sites, from the significant number of ‘omission sites’ presented to you through duly made representations. This additional allocation(s) should address the shortfall, which would enable you to recommend to the council that the Core Strategy is capable of being found sound following modifications.

\[1 \text{ 852 (the shortfall created as a result of the draft Main Modifications) – 594 (additional supply available in the five 5 years, see Appendix B) = 258, rounded up to 260.}\]
The council considers it has been left with no alternative other than to review options which we consider to be less sustainable than those already proposed for development. This is not a situation the council considers at all comfortable to be faced with, and is a matter it feels it has been forced to address for reasons largely beyond its control. Very reluctantly, and on the basis that there is a further opportunity for legitimate public scrutiny and challenge through the forum of the EiP, the council considers that, of the omission sites, the most sustainable location for an additional strategic housing allocation is in Thornbury, east of Morton Way between Crossways Lane and Gloucester Road (a map indicating the site is presented at Appendix D). This would provide for 260 new homes and supporting green infrastructure, sport and recreation provision. To address your imposed housing shortfall the council has, after much consideration determined that Morton Way (north) allocation, stands ahead of the other sites under consideration as part of the Core Strategy EiP for the following reasons:-

In preparing the Core Strategy the council has recognised a number of challenges facing Thornbury, including falling primary school rolls and high town centre shop vacancy rates. Responses to early public engagement showed a perception among local residents of a decrease in the overall vitality of the town in recent years. In order to help address these issues, the council, together with community representatives/civic leaders, considered that the town would benefit from some sensitively planned and appropriately located residential development, the scale of which should be in the range of between 500-1000 homes. Park Farm was chosen as the most appropriate and sustainable location capable of delivering such a scale of growth, supported by civic leaders, and which would not undermine the focus of delivering growth at the higher order settlements, at the urban fringe of Bristol and at Yate/Chipping Sodbury.

Whilst the council has very strong reservations about identifying further development to that already identified in the Core Strategy, Thornbury is a sustainable settlement identified in the council’s spatial development strategy. There is deliverable land available to meet the identified shortfall. This development, in combination to that already proposed at Park Farm, would support the town’s schools, shops and community facilities.

While there may be other potential options at say Yate or Chipping Sodbury, given the role and function of these settlements and the scale of development already planned at north Yate, additional development would be considered to lead to unsustainable patterns of development, in the absence of any further significant investment in infrastructure. The delivery of the North Yate New Neighbourhood alone will result in an approximate 20% increase in the local population of Yate/Chipping Sodbury. This is double the approximate 10% increase in Thornbury’s population that the delivery of Park Farm will lead to. Moreover, the other locations potentially available to meet the housing shortfall of 260 units – be that from rural villages and/or Green Belt locations – would conflict with your Main Modifications which have not sought to impose a dispersed settlement strategy and/or propose the release of further land from the Green Belt for strategic development.

The council therefore suggests that a Main Modification is proposed that would allocate the land identified at Morton Way (north), Thornbury. In any event even if the proposed additional release of land does not find favour with you, the council considers that it is
essential that any shortfall created by the proposed Main Modifications to Policy CS15 is resolved through the EiP process.

Notwithstanding this, the council is most concerned about the lack of an opportunity for public involvement and engagement in any decision made to allocate an additional site to meet your identified shortfall. As you appreciate from this statement, the council does not consider further sites need to be identified beyond the 594 of additional new supply. However, neither is it prepared to support the IHS process, so, should you consider that there is the necessity for further supply in addition to the 594, the council requires that this is resolved through the EiP process for the reasons set out above.

However, to ensure all our communities have the fullest opportunity to consider this proposal and to restore in part the credibility and public trust in the plan making process as set out in statutory legislation, the council insists that you undertake a period of further public consultation based on a supplementary Inspector Note on this single issue and invite comments from all parties. Once you have received these it would then be appropriate for you to address the issues raised at a single further sitting day of the EiP. This is particularly pertinent given the fact that communities, individuals and other interested parties who had previously supported the proposals relating to Thornbury have not had the opportunity to participate or contribute to the debate at the EiP. A failure to provide the community and other relevant stakeholders with an opportunity at this late stage to respond would, in effect, disenfranchise them from the plan making process that has been afforded to all other similarly affected communities. In addition it would seriously undermine and jeopardise the Council’s ability to work in a constructive and effective way with parts of the community. The Council therefore would insist that the EiP is re-opened and additional sitting days are allocated to hear representations.

The council suggests that you use the following mechanism and process as the way forward to address the outstanding shortfall of 260 units:

a. That you acknowledge that the shortfall can be addressed in the way proposed by the council and that the process for making good the additional strategic site allocation(s) is via your Final Report to the Council and all references to the Interim Housing Statement are removed.

b. In order to restore credibility and public trust in the plan making process and comply with statutory requirements and plan making regulations, you issue a further Supplementary Inspector Note and contemporaneously give notice of your intention to hold an additional sitting day(s) in week beginning 4 February 2013 and invite comments from all interested parties.

c. Following consideration of all comments made you hold the additional hearing day(s) to discuss the merits of the matters raised.

d. Following the additional sitting day(s) you produce your final report and Main Modifications and issue your report to the Council by 31st March 2013.

With regard to steps b and c it is the council’s view that should you not support the council’s position put forward with regard to phasing, that prior to you confirming the final
modifications, a full opportunity is provided for people to comment on this proposed modification. In relation to the procedures to be adopted to enable proper and fair representations to be made at this late stage, they must be compliant with all relevant regulatory requirements so as to minimise any risk of a challenge to the procedures followed. The council considers that its concerns about the late stage at which this additional housing requirement has been indentified and the potential adverse impact that this has for the credibility of the Core Strategy process, would on balance be best addressed through the reopening of the EiP hearing sessions to deal solely with this single issue. The council would wish to work closely with you to ensure that this is achieved expeditiously and, if possible, without any significant impact on the overall timetable.

Given the EiP programme to date, the council requests that confirmation is provided both by you and the Planning Inspectorate that all necessary resources and diary arrangements will be made available to achieve this, and that there would be an agreed timetable for the delivery of your final report thereafter.
The council is concerned with your draft Main Modifications relating to Policy CS21, in particular changes made to the contribution that the new neighbourhoods should play in supporting future G&T provision. You were made aware of the high level of demonstrable demand currently experienced in South Gloucestershire for G&T pitches. You were also informed, in evidence presented by the council (Matter 12), of the constraints that exist on the supply of sustainable sites in the District and how this could lead to further pressure on Green Belt and open countryside locations – both contrary to Government policy, in particular in relation to Green Belt land as set out in Policy E of Planning Policy for Traveller Sites (PPTS), March 2012.

The council fully recognises the need to ensure its evidence base is maintained/updated in accordance with Policy A of PPTS. However, without a stronger and clearer approach to the role and function of the new neighbourhoods to delivering future pitches, the council considers the revised policy wording at CS21 (first paragraph) will be to negate and weaken the strategy of the whole Core Strategy and Policy CS21 in particular with regard to securing G&T pitches. Policy B (paragraph 9a) of the Planning Policy for Travellers document requires the Local Planning Authority to have a 5 year land supply of ‘specific deliverable sites’ but in light of the changes introduced by the draft Main Modifications, the council is not clear whether the proposed redrafted policy actually addresses this requirement and as a result if a 5 year supply can now be achieved. This again would be contrary to Government policy as set out in Policy B of PPTS.

In taking this forward, the council understands it needs to work with its new neighbourhood development partners to find sustainable solutions to meeting the housing needs of G&T families. However, it must have the appropriate and necessary policy framework to ensure it can engage in meaningful negotiations with the development sector. Unfortunately, as proposed, the draft Main Modification affecting Policy CS21 and the associated modifications to the new neighbourhood policies for the ‘potential provision’ of G&T sites (CS26, CS27 & CS31) will considerably weaken this from occurring.

The consequential impact as stated above is that the Core Strategy fails to achieve its delivery objectives for sustainable solutions to meeting the housing needs of G&T families, which in effect is contrary to paragraph 11 of PPTS. This will result in more sites coming forward in the Green Belt or open countryside and the overall identified need being unmet.

Accordingly, the council will be failing to meet its requirements under national Government policy and the objectives laid out in PPTS, in particular at paragraph 3 and the Government’s overarching aim ‘to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community’.

You are therefore asked to consider reinstating the words as set out in Policy CS21 and those cross referenced changes resulting in MM22 as provided to the Examination.
MM29 in relation to Chapter 18: Major Infrastructure Projects

The council welcomes the retention of a robust and comprehensive policy in relation to Major Infrastructure Projects in particular nuclear and community benefit. Despite a change of wording in Policy CS37(13) in relation to community benefits being 'sought' instead of 'provided', it is considered that the policy wording remains effective and when taken in combination with the sub text, provides clarity as to the full spectrum of community benefits that may come forward, for example from those secured through S106 to mitigate against impacts, to those that may be negotiated outside planning under relevant legislation or on a voluntary basis.

However the council also notes the deletion of the text at para 18.23 which according to your draft Main Modifications (MM28) was due to ‘insufficient evidence to suggest the impact of a new nuclear scheme would have the negative affect implied by this paragraph.’

The council requests that this deletion (which related to the less tangible impacts of new nuclear build on local communities) is re-considered following evidence recently considered at the Hinkley C Examination. It is noted that EDF accepted such impacts in their response to the Somerset Councils at Examination - see explanatory material below relating to the principle of their community fund (extract taken from Annex A - Extracts of EDF’s response to Joint Somerset Authorities on socio-economic impacts and mitigation):

“28. COMMUNITY FUND

28.1 Principle

28.1.1 EDF Energy agrees with the joint authorities that there should be a Community Fund to address those generalised impacts on the local quality of life that are difficult to identify and particularly difficult to mitigate through more direct means. In fact, the idea for a Community Fund (rather than Community Benefit packages outside the planning system) came from EDF Energy in its Stage 2 consultation. In response to feedback from consultation, EDF Energy increased that proposed Fund to £20m. The principle of the Fund is explained in the HPC Planning Statement from paragraph 9.4.12. That text explains the comprehensive approach which EDF Energy has taken in relation to the identification, limitation and mitigation of impacts across every aspect of the DCO application but continues:-

“9.4.12 EDF Energy accepts, however, that there are likely to be other less easily defined impacts which will be felt by local communities and which may not be addressed by the full range of other mitigation commitments. These less tangible impacts might be described as impacts on the “quality of life” of local communities.”

The council would therefore suggest that paragraph 18.23 is not deleted but amended to reflect this new evidence as follows (new text underlined):

18.23 Whilst acknowledging that the proposed nuclear new build project has the potential to bring benefits to the community, the consequences are not yet fully understood. There are likely to be other less easily defined impacts which will be felt by local communities and which may not be addressed by the
full range of other mitigation commitments. These less tangible effects might be described as impacts on the ‘quality of life’ of local communities.

18.28a The ability to negotiate community benefits………

The council considers it is very important that we retain some wording relating to the intangibles as this underpins our community benefit policy.

It is also noted that the Inspector has not amended Policy CS37(1) to include reference to ‘neighbourhood plans’. The importance of this inclusion was discussed at the Examination (see Examination Library ref CE18), and therefore we understood that the inclusion of the reference to Neighbourhood Plans had been agreed. The council requests that criteria 1 of CS37 is amended to read as follows:

“1. relevant development plan documents, **neighbourhood plans** and Council or locally produced village/town/community strategies and plans should shape the approach to the development……….”
Further Amendments

There are two further amendments, which the Council wishes to bring to your attention:

1. **Amendment to the Settlement Boundary at Thornbury.**
   
   The Council would like to see an amendment to the settlement boundary in order to encompass Park Farm, Thornbury. This is in order to reflect the resolution to grant planning permission (PT11/1442/O) taken on the 18th October 2012. The next opportunity to correct the settlement boundary would be through the Policies, Sites and Places DPD, we therefore request that you amend the boundary now by including this change in your final report. An amended Policies Map showing the revised alignment is presented below.

2. **Correction to Policy CS32**
   
   There is a need to correct the following formatting error:

   Minor changes were proposed to clause 6 of Policy CS32 in the December 2011 Core Strategy incorporating Post-Submission Changes which read:  
   
   **Local Development Documents and development proposals will take account of the vision and partnership priorities for Thornbury, and will:**

   **6. Support the provision of Extra Care Housing in Thornbury and the improvement of healthcare facilities through the re-provision of hospital services regeneration of Thornbury Hospital and a Health Centre to meet the requirements of the local population;**

   In error the second ‘*and*’ should not have been struck-through and should therefore be re-instated. The Council therefore requests that you include the re-instatement of the second ‘*and*’ in your final report, so that the clause reads:

   **6. Support the provision of Extra Care Housing in Thornbury and the improvement of healthcare facilities through the re-provision of hospital services regeneration of Thornbury Hospital and a Health Centre to meet the requirements of the local population;**
South Gloucestershire Council  
Local Development Framework  

<table>
<thead>
<tr>
<th>Ref No:</th>
<th>PM77</th>
</tr>
</thead>
</table>

**Changes to the Policies Map – Core Strategy**

<table>
<thead>
<tr>
<th>SGLP Proposals Map:</th>
<th>Inset Map 23</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Plan Policy Reference:</td>
<td>N/A</td>
</tr>
<tr>
<td>Core Strategy Policy Reference:</td>
<td>CS5 (Revised Settlement Boundary)</td>
</tr>
<tr>
<td>Site Name:</td>
<td>Park Farm, Thornbury</td>
</tr>
</tbody>
</table>

| Description: | Revised settlement boundary (Policy CS5) – to reflect the planning permission granted. New alignment indicated on the map as a dotted line. |

![Map of Park Farm, Thornbury showing revised settlement boundary as a dotted line.](image)

© Copyright South Gloucestershire Council [2012]. All rights reserved

This map is reproduced from Ordnance Survey with the permission of Ordnance Survey on behalf of the Controller of Her Majesty’s Stationery Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings 100023410 [2012].
### 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 boundary of 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 within the settlement boundary 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 within the settlement boundary 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) in villages with settlement boundaries, small scale
development will take place, defined on the Policies Map, but will be limited to infilling only within those villages with settlement boundaries washed over by the Green Belt. In addition, small scale development within or outside settlement boundaries, but well related, may also come forward through Neighbourhood Planning, community-led initiatives in the Policies, Sites and Places DPD and rural housing exception sites;

(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, community-led initiatives in the Policies, Sites and Places DPD and rural housing exception sites;

(c) development proposals should be commensurate with the locality in terms of its function, form, character and landscape and 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, and for housing will be no more than 30 dwellings or 1 hectare;

(d) defined settlement boundaries will be maintained around rural settlements and reviewed in the Policies, Sites and Places DPD for the first 5 years from the submission (March 2011) of the Core Strategy. This will include a review of the approach to the distribution of housing in the rural areas 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;

6. Outside, but adjacent to, the settlement boundaries for Yate/Chipping Sodbury, Thornbury and the North and East Fringes of Bristol, non strategic development may come forward through Neighbourhood Planning and community-led initiatives in the Policies, Sites and Places DPD, provided that the proposals satisfy criterion 5(c) above;

7. Elsewhere in the open countryside, new development will be strictly limited.

8. Housing proposals, which do not conform to the framework above, will be required to demonstrate, that the housing provision set out in Policy CS15 is not capable of coming forward, taking account of all available contingencies and bringing sites forward from later phasing periods, as well as being consistent with criterion 5(c) above and the principles of securing sustainable development.

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.

**Green Belt Boundaries**

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.

Only the following exceptional circumstances will justify non strategic changes to Green Belt boundaries:

- to facilitate development for housing and other land uses under criteria 5, 6 and 8 above, where 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 the need to release it for these land uses and that such releases are consistent with the principles of securing sustainable development;

- to make minor adjustments to address anomalies e.g. where the current boundary does not follow readily recognisable boundaries using physical features in accordance with national policy;

Any non strategic changes to Green Belt boundaries will come forward in the vehicles of Policies, Sites and Places DPD and/or Neighbourhood Plans

Strategic changes including any possible extensions of the Green Belt to compensate for the loss of Green Belt will only take place following a review of the Local Plan having particular regard to the requirements to establish long term boundaries capable of enduring beyond the plan period as identified in the NPPF.

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 national policy, and therefore no change is required to Green Belt boundaries.

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

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 Policies 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.

6.7a Communities in both the urban and rural areas will be empowered to shape the future of their own local area through opportunities presented by Neighbourhood Planning and community-led initiatives delivered through the Policies, Sites and Places DPD and rural housing exception sites.

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

---

1 See para 16.1
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 national policy, 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. The approach to rural housing will be reviewed through the Policies, Sites and Places DPD allowing the Council to engage with local communities over the future use of settlement boundaries. Any proposed changes will be identified in the Policies, Sites and Places DPD. Development within or well related to villages and settlements without boundaries, and on the edge of urban areas, may come forward through Neighbourhood Planning or community-led initiatives delivered in the Policies, Sites and Places DPD. In all instances, careful consideration will be given to the appropriate scale and form of development and to any cumulative impact arising as a result of other development proposals in the area.

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 within and outside the Green Belt will comprise schemes of no more than 30 dwellings or 1 hectare. Such schemes will be delivered through the Policies, Sites and Places DPD or through Neighbourhood Plans as set out in criterion 7 of Policy CS5.

6.8b Where development proposals come forward in accordance with this policy, non-strategic changes to Green Belt boundaries may be appropriate. These will be delivered through Neighbourhood Plans and/or the Policies, Sites and Places DPD. The opportunity to correct minor Green Belt boundary anomalies and accord with national policy will also be taken.

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.
Table 1 - New and Additional Housing Potential in First Five Years since April 2012

<table>
<thead>
<tr>
<th>Source</th>
<th>Number of Additional Units</th>
<th>Notes</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New sites with Planning Permission</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Frome Court, Thornbury</td>
<td>14</td>
<td>New planning permission and site under construction not included in evidence at the EiP</td>
<td>Available</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Suitable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Achievable</td>
</tr>
<tr>
<td>Land at Broad Lane, Yate</td>
<td>14</td>
<td>New planning permission not included in evidence at the EiP. Developer Newland Homes. Site advertised “Acquired by Newland Homes”</td>
<td>Available</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Suitable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Achievable</td>
</tr>
<tr>
<td><strong>New sites awaiting completion of S106</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minelco Site, Randolph Ave. Yate</td>
<td>34</td>
<td>New planning application awaiting completion of S106 not included in evidence at the EiP. Developer David Wilson Homes.</td>
<td>Available</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Suitable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Achievable</td>
</tr>
<tr>
<td><strong>Planning Applications for new sites</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Blackhorse Day Centre, Mangotsfield</td>
<td>31</td>
<td>Council owned site. Planning application submitted for residential development (PK12/3018/R3O). Site subject to pre-application discussion and no “In principle” objection to residential development.</td>
<td>Available</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Suitable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Achievable</td>
</tr>
<tr>
<td>Rodford Primary School site, Yate</td>
<td>63</td>
<td>Council owned site. Planning application submitted for residential development (PK12/3163/R3O). Site subject to pre-application discussion and no “In principle” objection to residential development.</td>
<td>Available</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Suitable</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Achievable</td>
</tr>
<tr>
<td>Sites moved forward into “Five year” period</td>
<td>40</td>
<td>The development comprises a foodstore, infilling of a quarry and two phases of residential development. Due to the works to infill the quarry Phase 2 completions were not expected to commence until the latter part of the “Five year” period with most beyond. Foodstore (PK12/1311/RM) has planning permission and work is due to start in December 2012. Application submitted (PK12/1828/F) for Phase 1 of the housing development consisting of 62 (McCarthy and Stone) elderly persons flats (flats being advertised for sale). Application also submitted for infilling works to the former quarry using quarry spoil and not non-imported material as previously. Phase 2 therefore expected to commence sooner than anticipated.</td>
<td>Available Suitable Achievable</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Barnhill Quarry, Chipping Sodbury</td>
<td>57</td>
<td>Site identified at April 2012, but not included in five years due to uncertainty. Housing Enabling Team progressing site with AH partners together with other “Stalled” sites. Pre-commencement conditions discharged 04/05/2012. Existing buildings being demolished at October 2012. Potential therefore to include within the Five years.</td>
<td>Available Suitable Achievable</td>
</tr>
<tr>
<td>Kingswood Trading Estate, Kingswood (Ref 0095)</td>
<td>14</td>
<td>Site identified at April 2012, but not included in five years due to uncertainty. Development commenced since April 2012 and first units complete and remainder under construction, therefore moved into Five year period.</td>
<td>Available Suitable Achievable</td>
</tr>
<tr>
<td>The Rotunda Club, Moravian Road, Kingswood (Ref 0112)</td>
<td>14</td>
<td>Site identified at April 2012, but not included in five years due to uncertainty. Planning application for extension of time granted now more likely in Five year period.</td>
<td>Available Suitable Achievable</td>
</tr>
<tr>
<td>Bath Street Garage, Staple Hill (Ref 0113)</td>
<td>13</td>
<td>Site identified at April 2012, but not included in five years due to uncertainty. New Full Planning application PK12/2249/F submitted by Cotswold Homes Ltd, site likely to be developed in Five year period.</td>
<td>Available Suitable Achievable</td>
</tr>
<tr>
<td>Sir Bernard Lovell Playing Field, Oldland Common (Ref 0117)</td>
<td>13</td>
<td>Site identified at April 2012, but not included in five years due to uncertainty. New Full Planning application PK12/2249/F submitted by Cotswold Homes Ltd, site likely to be developed in Five year period.</td>
<td>Available Suitable Achievable</td>
</tr>
</tbody>
</table>
North Yate New Neighbourhood | 240 | Previously a total of 260 completions identified in the five year period. Heron keen to proceed with the development as soon as possible. Given their freehold interest in much of the land, and in particular the early phases of the scheme, there is no land ownership impediment to progressing at a faster rate. Their current expectation is of 750 completions of which 250 comprise the Barratt site at Peg Hill and 500 are on the initial phase of Heron development north of Randolph Avenue/Leechpool Way. | Available | Yes | Suitable | Yes | Achievable | Yes |

| Council Owned Sites |

| The Heath/Newton House EPH, Cadbury Heath | 60 | The property extends to 0.77 ha and comprises The Heath a former children’s home and Newton House former EPH. Newton House has been identified for decommissioning and closure between Autumn 2012 and Autumn 2013. The Heath is currently being considered for formal disposal. An Extra Care Housing Scheme on the combined site is proposed as the most likely future use, but any potential for residential subject to viability and C of U consent following bids for the reprovision of an Extra Care Housing scheme. Following the Council decision (5th Nov 12) to dispose and tender through the Housing Delivery Panel the site will deliver an ExtraCare scheme consisting of minimum of 60 mixed tenure self contained flats and ancillary communal areas for older people. This development will deliver a significant contribution to the South Gloucestershire Strategic target of 700 ExtraCare units by 2016 and thereby improve choice of secure independent living for older people. | Available | Yes | Suitable | Yes | Achievable | Yes |

Total Additional Units | 594 |
* Assessing when and whether sites are likely to be developed in the first Five Years

Assessing availability for housing

A site is considered available for development, when on the best information available, there is confidence that there are no legal or ownership problems. This means that it is controlled by a housing developer with an expressed intention to develop or a landowner with an expressed intention to sell.

Assessing suitability for housing

The following factors are considered in the assessment of a site’s suitability for housing, now or in the future:

- Whether the site is in a sustainable location for development in accordance with the adopted development plan for South Gloucestershire and the emerging Core Strategy.
- Policy restrictions; i.e. environmental designations. Sites identified as being retained for economic development use or as open space or in community uses.
- Physical problems or limitations; and
- The environmental conditions.

Assessing achievability for housing

A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of a developer to complete and sell the housing over a certain period. It will be affected by a number of factors.
## Distribution of Housing

### POLICY CS15 - DISTRIBUTION OF HOUSING

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 homes in accordance with the plan, monitor and manage approach and the location of development set out in Policy CS5. The distribution will be as follows:

### The indicative phasing capacity is shown below:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions 2006 – 2012</td>
<td></td>
<td></td>
<td></td>
<td>4,990</td>
</tr>
<tr>
<td>North &amp; East Fringes of Bristol urban area</td>
<td>Existing Local Plan Allocations</td>
<td>3,750</td>
<td>3,520</td>
<td>25</td>
</tr>
<tr>
<td></td>
<td>Potential housing sites, including infill development³</td>
<td>1,070</td>
<td>325</td>
<td>735</td>
</tr>
<tr>
<td></td>
<td>New Neighbourhoods:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• East of Harry Stoke¹</td>
<td>155</td>
<td>1,250</td>
<td>595</td>
</tr>
<tr>
<td></td>
<td>• Cribbs/Patchway</td>
<td>235</td>
<td>1,520</td>
<td>3,945</td>
</tr>
<tr>
<td>Rest of South Glos</td>
<td>Potential housing sites including infill development³</td>
<td>905</td>
<td>185</td>
<td>450</td>
</tr>
<tr>
<td></td>
<td>New Neighbourhood at Yate¹, ²</td>
<td>260</td>
<td>940</td>
<td>1,500</td>
</tr>
<tr>
<td></td>
<td>Housing Opportunity at Thornbury</td>
<td>260</td>
<td>240</td>
<td>-</td>
</tr>
<tr>
<td>Windfall allowance</td>
<td></td>
<td>750</td>
<td>750</td>
<td>1,500</td>
</tr>
<tr>
<td>TOTAL excluding completions 2012 - 2027</td>
<td></td>
<td>6,635</td>
<td>7,880</td>
<td>7,250</td>
</tr>
<tr>
<td>TOTAL including completions 2006 - 2027</td>
<td></td>
<td>7,385</td>
<td>8,730</td>
<td>23,365</td>
</tr>
<tr>
<td>The appropriate level of new homes will be reviewed after 10 years from the adoption of the Core Strategy, to be reviewed prior to 2021.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### NPPF Para 47 compliant buffer³:

- a. Revised phasing, Cribbs/Patchway New Neighbourhood | 858 |
- b. Revised phasing, North Yate New Neighbourhood (Peg Hill) | 250 |
- c. Additional housing potential identified since April 2012 | 594 |

Total available supply - 2012/13-2016/17 (5yrs) | 9,087 |
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).

5 Please see paragraphs 10.6b and 10.6bi. The additional “buffer” supply is greater than the requirements of the NPPF (para. 47), as a 23% buffer can be demonstrated.

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 28,355 new dwellings, 4,990 of which have already been completed, this means providing 21,865 23,365 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:

i. 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).
ii. 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).

iii. Reviewing additional housing potential since April 2012 (594 dwellings from the following sources: new sites with planning permission; new sites awaiting signing of S106 Agreements; planning applications for new sites; sites moved forward into the first five years from later in the plan period (including 240 dwellings brought forward on the North Yate New Neighbourhood, on land controlled by Heron Land Development Ltd); and Council owned sites).

10.6bi This additional flexibility raises the total supply available in the first 5 years phasing period to 8,493 (6,635 + 750 ± +250 + 858 + 594 = 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 To ensure sufficient land is made available to meet housing needs to the end of the plan period the Council will undertake a review of the Core Strategy/Local Plan to be completed before 2021. This will have regard to 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.

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 TEXT DELETED

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.
Page intentionally left blank
APPENDIX D

Response to MM15: Area of land at Morton Way (north), Thornbury

NOT TO SCALE

© Copyright South Gloucestershire Council [2012]. All rights reserved
This map is reproduced from Ordnance Survey with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings 100023410 [2012].