

**PSM7**

**South Gloucestershire  
Core Strategy  
Examination**

**Position Statement  
for  
Matter 7: Spatial Strategy (Chpt 4) &  
Location of Development (CS5)**

**May 2012**

## **Matter 7 – Spatial Strategy (Chpt 4) & Location of Development (CS5)**

### **Q1 Is the overall strategy consistent with sustainable development principles as contained in the Planning Framework?**

Council response –. Yes, the Council considers the Core Strategy is consistent with sustainable development principles as contained in the Planning Framework. To this end it meets the requirement of NPPF paragraph 151.

- 1.1 To demonstrate the way the overall strategy is consistent with the sustainable development principles as contained in the Planning Framework we would bring to the inspector's attention the following 7 key matters for his consideration:
1. At paragraph 2, 11 and 12 the Framework states that planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. We consider that Chapter 4 and Policy CS5 by their inclusion in the CS meet this requirement.
  2. At paragraphs 6 – 10 the Framework states the Government's definition of sustainable development and how this is to be sought through the planning system. We consider that in preparing the Plan's development strategy we have fully complied with the Framework's expression of sustainable development as a process which considers the economic, social and environmental impacts of development jointly and simultaneously and not undertaken in isolation. We see this over-riding understanding and commitment expressed in the strategic objectives set out at paragraph 4.2 and through the locational strategy expressed in Policy CS5.
  3. At paragraphs 14 – 16 the Framework introduces and explains the Government's presumption in favour of sustainable development. The Inspector has indicated that the CS is required to include an additional policy. The Council has supplied this to the Inspector. Notwithstanding this, we consider that the Plan's strategic objectives in Chapter 4 and the locational strategy of Policy CS5 make provision for this.
  4. At paragraph 17 the Framework sets out the 12 core land-use planning principles that should underpin both plan-making and decision taking. The development strategy, in the opinion of South Gloucestershire expresses the objectives of these 12 principles as shown in the Plan's strategic objectives at paragraph 4.2, paragraph 4.3 which introduces the strategy for development and the locational strategy of Policy CS5.
  5. At paragraphs 18 – 149 the Framework sets out the 12 requirements for delivering sustainable development expressed as national planning guidance for local authorities and decision-takers both in drawing up plans and as a material consideration in determining applications. This is given policy framework expression through the 37 policies in the Core Strategy and the Development Strategy set out at Chapter 4. This ensures that the primacy of the development plan in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 is achieved and that the CS is consistent with

sustainable development principles contained in the Planning Framework. The Council also intends to complete the PAS NPPF checklist and make this available to the Examination. This is intended to provide a helpful guide for the Inspector to demonstrate how the Core Strategy is compliant with the NPPF and will support his own line of questioning on this matter.

5. At paragraph 157 the NPPF requires the CS in performing its role as the Local Plan for the District to meet and achieve 8 requirements. These matters are considered to be adequately addressed in both Chapter 4 and Policy CS5 as well as through the whole Plan, which must be read as a whole. The Council also intends to complete the Planning Advisory Service (PAS) NPPF checklist and make this available to the Examination which will provide further details on this matter.
6. At paragraphs 158 to 177 the NPPF requires the Core Strategy to be based on an adequate, up to date and relevant evidence base about the economic, social and environmental characteristics and prospects of the area. Furthermore, it requires the Plan to be deliverable. We consider the Plan at Chapter 4 and Policy CS5 complies with this as shown in the strategic objectives at paragraph 4.2, the overall setting out of the spatial strategy and through the locational strategy expressed at Policy CS5 - as the sites and quantum of development are subject to an appropriate scale of obligations to enable development to be delivered.

- 1.2 In conclusion, through the actions set out above the Council is confident that the overall strategy is consistent with sustainable development principles as contained in the Planning Framework. This is provided to the Examination to help the Inspector consider whether further modifications should be made to the CS. We are confident that in accordance with provisions set out in S112 of the Localism Act, any changes can be made to the Core Strategy without going to the heart of the Plan. To this effect, we have requested the Inspector recommends main modifications to the Core Strategy in accordance with S112 of the Localism Act. This has been set out by letter to the Inspector dated 13<sup>th</sup> April 2012.

## **Q2 Are there other spatial options which would be more likely to deliver better outcomes for South Gloucestershire during the plan period?**

Council response – No. The Council considers that the Plan’s spatial strategy is robust, coherent and delivers the best outcomes for South Gloucestershire during the plan period.

- 2.1 In accordance with the social, economic and environmental objectives of sustainable development, the spatial strategy set out in Chapter 4 and given policy expression in Policy CS5 up to 2026 is distinctive to the district and includes ambitions which are challenging yet realistic. At the heart of the Plan is the objective to improve people’s quality of life, maintain a prosperous economy and provide a strategic direction for the creation of mixed and balanced communities over the next 20 years and beyond, while protecting the natural and built environment of the District. It has been developed through a sound process which has involved continuing consultation and engagement with communities and other partners within and where relevant beyond the District boundaries, and gathering supporting technical evidence. The strategy has been

subject to Sustainability Appraisal to ensure that the most sustainable choices have been made. As a result our strategy enshrines the following key principles:

- Maintaining the strong character and identity of existing communities and places.
- Meeting the need for housing in a sustainable way.
- Respecting the importance of the quality of the environment and heritage and recognising that these possess significant constraints to future development.
- Ensuring a prosperous economy and local employment growth within a regime of plan, monitor and manage.
- Supporting the protection of the Green Belt and the open countryside as an asset that is cherished by our residents and businesses not only for its contribution to sustainable food production and a vibrant rural economy but also by our residents and businesses for its openness, its value for informal recreation and for its distinctive character and qualities.
- Helping to reduce carbon emissions and responding to climate change.
- Promoting locations for future development which are in line with the high level objectives of the Sustainable Community Strategy.
- Prioritising infrastructure investment which supports growth and the delivery of sustainable communities.

2.2 The development strategy concentrates new development within the **Bristol North Fringe (BNF)**. This is one of the most economically important locations in the South West supporting in the order of 70,000 jobs across a diverse range of key sectors – including aerospace engineering, defence procurement and supplies, financial services, retail and education. By focusing development in the BNF, the Plan recognises the economic importance of the whole area, the advantages to be gained by strengthening the inter-relationship between the work place and homes, whilst retaining and strengthening the character and identity of existing communities. At the heart of this is a key commitment to use the existing critical mass of concentrations of people, property and mix of uses to support the Council's place making and sustainable communities objectives – especially regarding the potential to deliver infrastructure efficient growth, district heat networks, and new public open spaces. To achieve this employment land will continue to be safeguarded to provide for the needs of businesses including the key sectors. This will be supported by enhanced public transport measures including the Greater Bristol Bus Network (GBBN), quality bus corridors, a bus rapid transit link to South Bristol, Bristol City Centre and Emersons Green, an improved cycling network and over the lifetime of the Plan improvements to the heavy rail system. As explained in Matter 9, the opportunities provided by the release of Filton Airfield has allowed further flexibility to respond positively to housing demand and the need to promote economic growth without compromising the existing spatial strategy. The outcome of this will be to strengthen and reinforce the BNF as a key location in South Gloucestershire and the West of England.

2.3 The **East Fringe of Bristol** includes a number of distinct communities within which there are pockets of relative deprivation in Kingswood, Staple Hill and Cadbury Heath that have been identified by the Council as priority neighbourhoods. Employment land

is mainly focussed on ageing industrial areas, many of the smaller sites have been lost over the years to other development, so that now the area significantly under-provides for the local workforce and 18,000 people commute daily to central Bristol and 6,300 people commute to the Bristol North Fringe. These changes in employment patterns, together with a lack of continued investment, have contributed to the declining economic fortunes of some of the traditional centres of these communities.

- 2.4 To address these issues the main thrust of the strategy for the East Fringe of Bristol up to 2026 is to complete the final development phase at Emersons Green. This involves a major mixed use development on 177ha of land at Emersons Green, east of the A4174 Avon Ring Road, to deliver in the region of 2,500 dwellings, a Science Park and 19ha for local employment. In total this development is expected to support over 6,000 jobs. The Science Park is key to the sub region (and beyond) in supporting the universities and existing industries and maintaining the region's international competitiveness. Ensuring this new development integrates successfully to strengthen a sense of community with the existing development west of the A4174 Avon Ring Road is a key challenge. In the rest of the East Fringe the focus is on managing smaller scale development so that it contributes to improving the opportunities and environmental quality of the area.
- 2.5 At **Yate & Chipping Sodbury** the key strategic objective is to put in place a long term strategy to continue to strengthen their role as successful and progressive market towns and to enhance residents' aspirations and the perception other people and businesses have of both towns. Up to 2016 the focus is on town centre investment, development of an evening economy and broadening leisure attractions and retail outlets. This is supported by objectives to remodel the western approach employment sites (at Stover and Badminton Roads), some limited housing development on previously developed land and providing and planning for better public transport, walking and cycling within the Town and to key destinations. Post 2016 the development strategy recognises the need to strengthen and broaden the social, economic and community base of Yate.
- 2.6 At the heart of this is a new neighbourhood for 2,400 dwellings by 2026 planned comprehensively as part of a whole town approach. This will ensure sustainable growth continues by helping to unlock the investment needed to support the delivery of new infrastructure, including new strategic sewerage investment, which will bring significant benefits to the town. It will also address the existing needs of the residents of Yate and Chipping Sodbury in terms of affordability across the housing market and broadening choice. The new neighbourhood will also provide for new education provision, addressing the current deficiency in the distribution of primary schools across Yate.
- 2.7 The development strategy for **Thornbury** supports the objective to ensure that it remains a successful and vibrant market town. Development is identified that is proportionate to the scale and function of the town and which will help address the economic and social issues that it currently faces.
- 2.8 **Within villages**, the focus will be on supporting existing services and limiting new housing, while supporting communities deliver locally based growth through the Policies Sites and Places DPD and neighbourhood planning as appropriate.
- 2.9 At **Sevenside** the development strategy recognises the significant structural issues the area faces – transportation infrastructure, flooding, ecology/ biodiversity and

archaeology. However, it also identifies the area's economic potential and identifies a clear framework for unlocking this while addressing and respecting the area's fragile and unique environment and habitats. Delivery mechanisms which would help to contribute to unlocking the areas longer term strategic economic potential are incorporated within the policy framework.

2.10 The Council strongly considers the spatial strategy as summarised above represents the best spatial option. However, other respondents to the Plan, setting aside considerations of housing numbers and specific locations for Yate/ Sodbury and Thornbury, have challenged the Plan's spatial strategy with regard to its approach to the Bristol East Fringe and the rural areas. The Council's response, setting out why these alternative spatial options for the location and distribution of growth would not deliver better outcomes for South Gloucestershire during the plan period are given below.

2.11 **Bristol East Fringe (BEF)** – Paragraph 2.4 above explains the considerable amount of new development that is made provision for in the CS at the BEF. In addition the Core Strategy identifies a further 1700 dwellings available for development in the BEF up to 2026. In combination, this represents a significant amount of development in a locality of the District which as set out at paragraph 2.3 above, experiences considerable social and economic inequalities. The Council is therefore strongly of the view that the development needs of the District up to 2026 can be met from more sustainable locations than additional urban extensions to the Bristol East Fringe south of Shortwood/ east of Warmley or east of Oldland Common. Consequently harm to Green Belt in this location is not outweighed by the strategic need for growth (see responses to Matter 6 and to Matter 8 Q1). Therefore, Policy CS29 of the emerging Core Strategy does not identify Green Belt land adjacent to the communities of the East Fringe of the Bristol urban area for development for the following reasons:

- i. Journey length and existing congestion on routes to employment and services in Bristol City Centre and along the ring road to areas of employment and services in the North Fringe are existing issues in this area. The necessary transport infrastructure improvements cannot be provided to overcome these issues and support further growth in this area. The Council is of the firm view that there is now no prospect of the improved rapid transit route from Bristol city centre to Emersons Green before at least 2020 and there is no planned improvements to transport infrastructure in the rest of the area. This position has been clearly set out in Justification for the Strategy for Housing to 2026, March 2011 Appendix 1: Transport Infrastructure (Examination Library Ref: EB21), and South Gloucestershire Council's Response to Inspector's Questions 28<sup>th</sup> June 2011 – Appendix 3: Transport Analysis Bristol East Fringe (Examination Library Ref:SG5). This has also been reviewed most recently by Atkins – Review of Strategic Transport Case (Examination Library RD41).
- ii. There are significant environmental constraints within the rural area including open green hillsides and ridgelines which are prominent in views out of the urban area. These make a significant contribution to its quality and character. Areas of public open space and footpaths are highly valued for their recreational value for the adjacent urban areas where there is under-provision of informal and natural/semi-natural green space. Historic assets at Siston Court (listed Grade 1) as well as archaeological assets, nature conservation assets including SNCIs and mature hedgerows further reinforce the environmental constraints. This is set out in the S.Glos environmental constraints evidence submitted to the South

West Regional Spatial Strategy (RSS) Examination in Public Examination Library Ref: EBOCSE1 & SA para 3.21, Appendix 7 pages 134-136 (Examination Library Ref: PS3).

- iii. Employment opportunities are limited in the existing urban area. The large deficit of jobs relative to the resident workforce (a ratio of 1:2) leads to significant out commuting (18,000 trips to central Bristol per day and 6,300 to the North Fringe) which would be exacerbated by further residential development. Access to strategic health facilities, retail and other services in Bristol city centre and the North Fringe is poor relative to other locations for growth identified in the Core Strategy (SA Appendix 7 page 134 Examination Library Ref: PS3).
- iv. Development in this area would have an unacceptable impact on the valued character and distinctiveness of existing rural communities and opportunities to successfully link to the existing urban area are limited by topography, the ring road and open space see SA Appendix 7 page 134 (Examination Library Ref: PS3).
- v. In accordance with the principles of localism, the Council has also taken into consideration the significant number of consultation responses to the Issues & Options document objecting to any development in the Green Belt adjacent to the East Fringe urban area. Civic and community leaders have been quite clear that development on Green Belt land adjacent to the East Fringe of Bristol Urban area would not be sustainable. The Inspector is asked to give some weight to this in accordance with paragraph 66 of the NPPF.

2.12 **Rural Areas** – The Council is strongly opposed to a more dispersed spatial strategy which either is intended to compliment that set out in Chapter 4 and Policy CS5 or replace all or some elements of it. Such a spatial option – with more development focused at lower order settlements would not achieve a better outcome for South Gloucestershire during the plan period. The Council justifies its position on this with respect to the following:

- i. The Core Strategy's central vision for rural settlements is to (inter alia) conserve and enhance their unique character and open countryside settings and to recognise them as providing a valuable setting to the main urban areas. Therefore, the Core Strategy does not support significant new development to be located outside of the Bristol urban area within South Gloucestershire or the market towns of Yate/Sodbury and Thornbury.
- ii. No reliance should be placed on the Draft Regional Spatial Strategy. While an allowance of 2,300 dwellings for the 'rest of South Gloucestershire' was planned in the draft RSS the policy circumstances are now quite different. The Draft RSS for the South West was never published in its final form and now never will be. Little weight should be attached to that document. South Gloucestershire's spatial strategy is now established by the Council's Core Strategy, in accordance with the Government's localism agenda.
- iii. In sustainability terms, proximity to the urban area is not in itself sufficient justification to compromise sustainable patterns and forms of development. In rural areas services and facilities are very limited, public transport links to the Bristol urban area are modest and further development in many cases would reinforce village dormitory roles. This would perpetuate unsustainable patterns of

development and would compromise the Core Strategy by displacing a scale and level of development which should be directed to a more sustainable settlements. It would therefore be at odds with visions and spatial strategies set out in the Core Strategy.

- iv. As set out in Matter Statement 25 the Council has identified that in the Rural Areas new development is aimed at supporting local needs. Local people should have more control of what and where development is provided, new development should be proportionate in scale to rural settlements and the valued and unique aspects of the countryside and the historic environment should be protected and conserved. In accordance with the Localism Act and the NPPF, should local communities identify development needs – generally considered to be commensurate to what could reasonable be called ‘infill’ or logical settlement rounding, this can be brought forward either through the Council’s Policies, Sites and Places DPD or through neighbourhood development plans.

2.13 In summary, South Gloucestershire Council recognises the importance of having an up to date and robust spatial planning policy framework which expresses in land use terms, the Council’s, our partners’ and communities’ strategic objectives and the means by which these will be delivered in accordance with the Council’s commitment to sustainable development. The Plan represents a pragmatic and positive approach that can be put in place quickly to provide an updated policy context to deal with the challenge of climate change, the expected market recovery, manage development in accordance with the requirements of the NPPF and ensure new growth is phased with the delivery of the necessary infrastructure required to support sustainable communities. The Core Strategy therefore provides the most appropriate spatial vision and development strategy and sets a robust, durable and effective sustainable strategy for managing the pressure for future development over the plan period.

**Q3 Is the overall balance of growth between identified settlements clearly founded on the evidence base and is it likely to be effective in promoting sustainable development across the Borough?**

Council response – Yes. The overall balance of growth between identified settlements (North and East Fringes of Bristol, Yate/Chipping Sodbury, Thornbury, and settlements within the rural area) is clearly founded on a comprehensive and extensive evidence base,

- 3.1 As an area that continues to experience high levels of growth, the Council is committed to delivering sustainable development. The Core Strategy clearly identifies those settlements and the levels of growth to support future development and how this will be delivered. It also establishes a strategic framework with which to co-ordinate and secure the necessary investment to support planned infrastructure. This inter-relationship is critical as it establishes the basis against which the overall vision of the Plan for communities and places in South Gloucestershire will be realised.
- 3.2 The council consider the response to Q2 above and Matter 9 Filton Airfield, sets out the Council’s justification for the level of growth identified in the urban area of Greater Bristol located within South Gloucestershire, as well as the approach to the rural areas and villages. With regard to the matters relating to Yate and Thornbury the Council’s position is further explained as follows:

- 3.3 **Yate**, in combination with the adjoining town of Chipping Sodbury, is the fourth largest urban settlement in the West of England Partnership area (this area covers South Gloucestershire, Bristol City, North Somerset and Bath and North East Somerset). The 2001 census recorded the population as being 34,550. Yate was subject to substantial housing development in the late 1960s and 70s, with a significant level of housing development continuing until the late 1990s. These market towns are supported by a range of facilities and services, which not only benefit their own communities but also those of the surrounding hinterland and villages that rely upon these important centres.
- 3.4 Yate and Chipping Sodbury are independent, but inter-related market towns, which form a contiguous built-up area. The two complement one another in many ways and their futures are dealt with together as one of the six spatial areas that the Core Strategy addresses. The town of Yate supports (and the residents benefit from) a considerable range of services, facilities and employment opportunities including:
- Industrial estates and business parks;
  - Educational establishments (1 academy, 2 secondary schools, 9 primary schools and 1 special school);
  - Two Town centres (Yate and Chipping Sodbury), and local centres/parades;
  - Leisure facilities including indoor and outdoor sport complexes;
  - A railway station;
  - A range of community facilities, clubs and groups; and
  - Good quality parks and informal open spaces.
- 3.5 In recent years the town has also benefited from the following infrastructure investment:
- A new 50+ pop in café;
  - An extensive refurbishment of the Leisure Centre;
  - A new artificial grass pitch and sports hall at Chipping Sodbury Secondary School;
  - A new youth venue and café;
  - A complete refurbishment of Yate Library;
  - A new community health and children's centre, including a minor injuries service;
  - A replacement secondary school and improved sports facilities at Yate International Academy;
  - A new town centre bus station; and
  - A major expansion of the Yate Shopping Centre, including the recent redevelopment and expansion of the Tesco supermarket. Additional outlets also have been granted planning permission at the shopping centre.
- 3.6 Yate benefits from proximity to the motorway network and transport links with Bristol and Bath, enhancing the attractiveness of the town to commercial and business investors.
- 3.7 Yate is well linked to the Bristol conurbation; the Bristol East Fringe and Science Park currently under development at Emerson Green East is located approximately 5 kms from Yate. Yate is situated approximately 10 kms from the employment areas in the North Fringe of Bristol urban area and is approximately 15 kms from the centre of Bristol. The rail services from Yate serve Gloucester and Cheltenham to the north and Filton (Abbey Wood), Bristol Parkway, Bristol Temple Meads and Weston-super-Mare to the south. Weekday frequencies in the morning and evening peaks are generally hourly, with a journey time of 9 minutes to the Bristol North Fringe and 25

minutes to the centre of Bristol. Bus services link the centre of Yate with Bristol every 30 minutes.

- 3.8 The Regional Strategy (RS) process recognised Yate as a sustainable location. The RS Panel report concluded, in January 2008, that development provisions should encompass whole HMAs, such as the West of England HMA, and that Strategic Significant Town and City (SSTC) locations within them should represent the places where strategic scale housing allocations are focused. The Panel concluded that Yate, as part of the West of England HMA, has a sufficiently close spatial relationship with the SSTC of Bristol that it functions as an integral part of it. Yate was therefore seen as representing a suitable location for further growth in the HMA. Reflecting on the RSS Panel's conclusions and further representations to it, the Secretary of State's Proposed Changes (July 2008) stated:

*Although physically detached from the main urban area, the towns of Yate and Keynsham have strong functional relationships with Bristol and form part of the SSCT. There are opportunities at both towns for housing and employment growth to strengthen their roles, so they can better serve their own populations and that in the surrounding areas.*

(Examination Library Ref: LR8/2, paragraph 4.1.13)

- 3.9 In summary the town has benefitted from the pause in its growth, which has allowed much needed services and facilities to be provided and improvements to the sense of community to be developed. However, given the strong sustainability credentials of Yate as a place and as a community, it is now considered appropriate that further growth should be promoted enabling the town and its community to fulfil its vision as a progressive market town.
- 3.10 **Thornbury**, with a population of 12,342 and 4,935 households (2001 Census) is the third largest market town in South Gloucestershire. However, it has experienced structural change in recent years. An ageing population, decreasing household size, declining population and a lack of available affordable and family housing are impacting on the town. Primary schools have significant surplus spaces. The town centre has experienced a downturn in vibrancy. Families and young people wishing to live in the town are facing a stagnated housing market. It demonstrates strong characteristics as a dormitory town located close to the A38 and motorway network.
- 3.11 Some of these issues are national trends. However the effects are being felt acutely in Thornbury and may worsen if left unchecked. Changes in characteristics are threatening to erode the identity and distinctiveness of the town and its ability to service its own needs now and in the future.
- 3.12 Without any planned development new dwelling completions in Thornbury are anticipated to be very low. This is due to limited brownfield and infill opportunities in the town, with little or no certainty as to the future availability or deliverability of such sites. This is not sufficient to sustain the town's vitality. Continued infill/intensification and brownfield development can in any case have cumulative adverse impacts on the character and identity of existing local areas and communities. For these reasons the identification of a greenfield location beyond the current settlement boundary is the Council's preferred option.
- 3.13 The last major greenfield housing development in the town was at Midland Way which was completed in 1997. The South Gloucestershire Local Plan (adopted 2006) made

no housing allocations for Thornbury beyond its settlement boundary. Since completion of the last major development, whilst the retail and service offer in Thornbury's town centre has effectively stood still, it has experienced increased competition from continued investment in other shopping and service destinations. In recognition of this, the Thornbury Town Centre Strategy (launched in 2009) seeks to increase the town centre's vibrancy by [*inter alia*] encouraging food and drink establishments, niche and local retailing, and an increase in tourism.

- 3.14 Information contained at paragraph 4.32a onwards in the December 2011 SA Report (examination library reference PS3) on pupil roles shows that of July 2011 there are around 200 surplus places across primary schools in Thornbury (17% of places are surplus). The projections indicate that as demand for places across the primary age range in Thornbury decreases over the next four years surpluses increase to 230 places (19%). Demand for places across the secondary school age range in Thornbury remains high.
- 3.15 A development of 500 dwellings would generate in the order of 180 primary school age pupils, 90 secondary school age pupils (Years 7-11) and 25 Post 16 students (Years 12-13). A development of 500 dwellings together with other small scale housing opportunities and housing turnover in the town would help to sustain the existing primary school provision in the area and would contribute as part of an overall strategy to supporting a successful and vibrant Thornbury.
- 3.16 The Vision and Spatial Strategy for Thornbury plans for a modest increase in local housing stock and population to help address the Towns underlying demographic, social and economic issues. Maintaining and supporting the vibrancy of Thornbury is therefore not only important for the town itself in realising its vision, but also for surrounding communities. The evidence base for this is clearly set out in the SA and fully supports the identification of Thornbury and the level of growth of 500 dwellings in the Core Strategy.

#### **Q4 Is the spatial strategy deliverable in the plan period and have the risks to deliver been properly assessed?**

Council response – Yes. The Council is confident that the spatial strategy is deliverable in the period and that risks to deliver have been properly assessed.

- 4.1 The Council has taken the necessary and appropriate actions to ensure there are no significant impediments that would prevent the overall quantum of development and locations identified from coming forward over the plan period. This is set out more fully in Matters 9, 14, 21, 22, 23, 24, 27 and 28 and in summary as the following:
- i. Through a full and extensive understanding of the constraints in areas identified in the spatial strategy the council is confident that there are no environmental issues that would prevent development coming forward and which cannot be overcome through effective mitigation. This is set out more fully in Matters 9, 14, 21, 22, 23, 24, 27 and 28.
  - ii. By working closely with Government's Agencies the Council is confident that the relevant agencies are satisfied that appropriate measures and steps have been taken to address delivery issues and associated risks over the Plan period.

Supporting statements from key government agencies have been provided to the Examination.

- iii. Through work undertaken in preparing the New Neighbourhood Delivery Statements (Examination Library refs: EB39, EB40, EB41 and EB42) the Council is confident that there is a reasonable prospect that the infrastructure need to support the overall level and locations of development identified in the Core Strategy can be delivered.
- iv. The Council has sought to agree Statements of Common Ground (SOCG) with all our development partners involved in the new neighbourhoods and Thornbury. The status of these be made available to the inspector before the commencement of the Examination.

## **Q5 Is there sufficient flexibility to the CS to allow for change or unforeseen events?**

Council response – Yes

- 5.1 The spatial strategy achieves the correct overall balance in recognising the quantum and locations for development alongside our communities' genuine concerns about the scale and impact of growth. In doing this, the council therefore considers sufficient flexibility is demonstrated in the Core Strategy to allow for change or unforeseen events for the following reasons:
- i. While the focus of sustainable growth is within the communities of the North and East Fringes of Bristol, the Core Strategy is not overly dependant on any one location to deliver this growth. The spatial strategy recognises that a number of places in South Gloucestershire in relation to their role and function will contribute to meeting the needs of the District over the Plan period. The Core Strategy Key Diagram gives clear locational expression to this.
  - ii. As set out in Matter 8 the Plan provides for sufficient housing to meet the identified demand likely to arise over the plan period while allowing 'headroom' to allow for rapidly changing circumstances; firstly should the market out perform expectation and secondly, to enable resilience to be built into the overall housing portfolio to allow for any unforeseen site delivery delays.
  - iii. The council is taking a comprehensive but pragmatic approach to working with our developer partners. Relevant policies in the Plan and the April 2012 LDS identify the delivery processes that will be required to implement the CS spatial strategy. This will ensure development can come forward sustainably and effectively. Statements of Common Ground with our developer partners confirm their understanding and agreement.
  - iv. Through the Policies, Sites and Places DPD and Neighbourhood Development Plans communities working in partnership with key stakeholders can identify further development opportunities to support their local communities ambitions and objectives.

## **Q6 Have the cross boundary implications of the strategy been taken into account?**

Council response – Yes, the cross boundary implications of the strategy have been taken account of in the Core Strategy.

- 6.1 The main cross boundary implications of the strategy are likely to affect Bristol City; this is because the focus of sustainable growth is within the communities of the North and East Fringes of Bristol. Future developments in the Avonmouth/Sevenside area are also likely to have cross boundary implications for Bristol City. These implications have been assessed and appropriately taken into account in the Core Strategy policies.
- 6.2 The Council has prepared a Topic Paper on the Duty to Co-operate and Joint Working (Examination Library Ref: TP1) which provides details of the extensive joint working which has supported the development of the Core Strategy. It is also important to note that the South Gloucestershire Core Strategy needs to consider the implications that the Bristol Core Strategy (Examination Library Ref: RD23) has on it.
- 6.3 The Duty to Co-operate and Joint Working Topic Paper sets out the strategic matters that have been incorporated into the December 2011 Core Strategy and which have been addressed in work undertaken by the Council under the direction of the Inspector, following submission (31<sup>st</sup> March 2011). It also covers the way the Council has considered spatial planning issues as they relate to joint working with adjoining local planning authorities as relevant to the Core Strategy development.

## **7.0 Conclusion**

- 7.1 South Gloucestershire has experienced considerable change throughout the past half century. In the period up to 2026 the district faces the challenge of continuing to ensure that growth that has taken place and that which is further planned does so in a way that supports the Council's commitment to sustainable communities. Responding to and managing the impact and pressure of new development through the basis of bottom up community led plan is therefore a key challenge. The spatial strategy set out in Chapter 4 and given policy framework expression in Policy CS5 is the central plank of the Council's commitment to deliver growth sustainably and in accordance with the primacy of the development plan. The council is therefore confident that the spatial strategy is consistent with the NPPF, represents the best option for the District is deliverable and sufficiently flexible. For the reasons set out in this paper the Inspector is respectfully asked to take these matters into consideration.