

### **Matter 3: Initial Chapters**

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- 1) RPS is broadly supportive of the Vision and Objectives for South Gloucestershire during the plan period; they can be considered to be achievable and deliverable. In particular we support the identified need at paragraph 4.8 of seeking to redress the imbalance of jobs and homes in the North Fringe of Bristol, which in turn is reflected in the Vision. This has been a long stated objective dating back to the Local Plan and remains highly relevant today. Whether the strategic objectives meet the aspirations of organisations and the public is probably only a question the Council can answer having reviewed all of the representations during the lifetime of the preparation of the plan.
- 2) Our response focuses principally on whether the Objectives meet the requirements of the NPPF is so far as the Core Strategy being positively prepared. RPS objects to the wording of *“up to 26,400 homes in the period to 2026 and beyond”*. These are ambiguous terms and provide no certainty. The ‘up to’ reference is unhelpful as it does not assist in establishing the target as a robust one. The Council has arrived at an identified level of growth based on a wide number of factors as listed in paragraph 10.5a. That is a level of growth that is required to meet the Vision and Objectives of the plan; the consequences of failing to meet that target should be clearly expressed. It is not satisfactory to imply that the Vision and Objectives of the plan can be met if the level of growth is not achieved.
- 3) Indeed, the ‘up to’ statement reflects a lack of ambition that is not reflected by the NPPF or the Ministerial Statement of 23 March for planning positively for growth and responding to wider opportunities. The ‘up to’ remark suggests restraint; to that end, RPS recommends that ‘up to’ should be replaced by ‘at least’. This would set the tone for a more proactive and flexible approach.
- 4) It is not clear why the CS has been amended to ‘to 2026 and beyond’<sup>1</sup>. Policy CS15 makes clear that 26,400 homes will be delivered in the period 2006 to 2027, which adequately meets the requirements for meet growth from 15 years from the adoption of the plan. Such ambiguity is not therefore necessary and thus the wording should be changed ‘to 2026 and beyond’ to ‘2006 to 2027’. Being clear on the start date will also remove any doubt that a proportion of the 26,400 homes have already been built. These matters are considered further in respect of Matter 8 (Housing Provision).

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<sup>1</sup> CS Paragraph 1.36