

1. MATTER NO 20, QUESTION 1 –

IS THERE SUFFICIENT DETAIL CONTAINED IN POLICY CS16 TO CLARIFY THE COUNCIL'S APPROACH TO HOUSING DENSITY?

1.1 It should be noted that Barratt Developments Ltd is represented by a number of participants at the South Gloucestershire Core Strategy EIP. In the context of the housing opportunity area at Thornbury (Park Farm), Pegasus Planning Group wish to make the following comments in relation to this matter:

1.2 Policy CS16 requires housing development to do the following:

- Make efficient use of land;
- Conserve resources and maximise the amount of housing supplied;
- This should be done particularly in and around town centre locations and other locations where there is good pedestrian access to frequent transport services;
- Density of development should also be informed by the character of the area and contribute to:
 - The high quality design objectives set out in Policy CS1;
 - Improving the mix of housing types in the locality; and
 - Providing adequate levels of public open space, semi-private communal open space and private outdoor open space.

1.3 The NPPF, at paragraph 47, states that to boost significantly the supply of housing, Local Planning Authorities should set out their own approach to housing density to reflect local circumstances (amongst others).

1.4 The Framework therefore provides flexibility to LPAs to deal with density whichever way they see fit (i.e. to prescribe a minimum density level which developments must meet, or provide flexibility in applying density, taking account of local factors).

1.5 In this case, South Gloucestershire has chosen not to apply a prescriptive policy to require developments to deliver a minimum density, which is the route that the Council first followed in its Issues and Option (April 2008). This was because of the

Panel's Report to the draft RSS which required Council's to achieve an average density of 40 dph. Given that the SW RSS will never be adopted, there is no need to include a minimum density requirement within the policy, as this requirement of the RS carries minimal, if zero weight.

1.6 Pegasus originally objected to the wording contained in the Issues and Options on the basis that a minimum density requirement would have a detrimental impact on the design and layout of development when also having to take into account local circumstances. Subsequently, this prescriptive policy requirement was removed from the Pre-submission draft, and submission draft of the Core Strategy. Barratt Developments Ltd therefore no longer objects to the wording of the policy.

1.7 It is considered that Policy CS16 provides sufficient detail to clarify the Council's position, as it requires housing development to:

- Maximise the amount of housing supplied thereby making efficient use of land (the NPPF requires LPAs to boost significantly the supply of housing (paragraph 47);
- Maximise housing supplied particularly in and around town centre locations and other locations where there is good pedestrian access to frequent public transport services (this follows the basic principles of sustainable development contained within the NPPF);
- Density should be informed by the character of the local area and should contribute towards high quality design objectives, which is required by section 7 of the NPPF;
- The requirement to improve the mix of housing types is partly borne out of a requirement of Para 50 of the NPPF. This clause provides flexibility to the density of developments, taking account of local circumstances. For example, if there is a large proportion of smaller properties within a certain area, but there is a need for family housing, then it is reasonable to allow developments with a lower density, but providing a greater proportion of family sized units;
- The requirement of the last clause of policy CS16 can be interpreted that open space, communal open space and private outdoor open space should not necessarily be compromised for density.

- 1.8 For the above reasons, it is therefore considered that the policy provides sufficient detail to clarify the Council's position. It is therefore clear that the Core Strategy is following the thrust of the NPPF, which is to make efficient use of land whilst taking account of the character of the area (i.e. local circumstances).
- 1.9 Policy CS16 is supported by the location specific policies, such as CS33 for Park Farm, Thornbury, which set specific housing targets for the housing opportunity sites. Detailed examination of the Park Farm site, through the development management process, has confirmed that the site can and will accommodate 500 homes.