

**PSM25**

**South Gloucestershire  
Core Strategy  
Examination**

**Position Statement  
for  
Matter 25: Rural Areas**

**June 2012**

## Matter 25 – Rural Areas Policy CS34

### Q1 Is there any benefit in defining boundaries to villages either to encourage or limit future development?

Council response – Yes in accordance with approach set out in the Core Strategy.

- 1.1 The Core Strategy's policy on settlement boundaries is that they will be retained for 5 years from the date of submission (March 2011). Within that period there will be a review of the approach to the distribution of rural housing, with any changes being reflected in the Policies Sites and Places Development Plan Document (PSP DPD), following agreement with local communities and engagement with other stakeholders/partners. However any changes will come into effect on adoption of the DPD, which is identified as October 2015 in the current Local Development Scheme (Examination Library Ref: EB1/1).
- 1.2 Without prejudice to the forthcoming review the following comments are made in respect of settlement boundaries. The Council considers that there are both advantages and disadvantages in defining settlement boundaries to rural settlements.
- 1.3 The advantages of settlement boundaries are that they:
  - Provide certainty for communities, landowners and developers as they define the areas within which development would and would not normally be acceptable.
  - Help to ensure consistency in Development Management decision making across the authority and reduce the pressure on decision making process.
  - Could be used to direct development towards smaller settlements which would benefit from additional development which would contribute to retaining a vibrant local rural community.
  - May help to sustain existing facilities and services in rural settlements by directing development to those locations or by directing development to settlements near to facilities and services in other nearby settlements.
  - Provide numerous possibilities for development when compared to specific allocations.
- 1.4 The disadvantages of settlement boundaries are:
  - Opportunities for development will diminish over time unless boundaries are reviewed.
  - As sites are generally small the opportunities for securing affordable housing on such sites is limited, unless boundaries are set which allow for larger developments in appropriate locations.
  - The scope for new employment land coming forward is limited as sites are generally small, unless boundaries are set which allow for such development in appropriate locations.

- As opportunities for development are numerous and generally on smaller sites this makes it more difficult for the Council and other agencies/providers to effectively and efficiently plan and deliver the provision of their services.
- There could potentially be conflict between development allowed through the development boundary mechanism and the Council's aim of empowering local communities to determine the future of their communities. The existing approach rather limits the opportunity for communities without settlement boundaries to bring forward locally led development proposals. This can disproportionately focus development to a few settlements unless boundaries are identified in association with communities or reflect aspirations identified through Neighbourhood Planning or Parish Planning.

1.5 In summary the Council's position in relation to settlement boundaries is to retain them for a period of 5 years from submission, during which time there will be review of the approach to the distribution of rural housing and any changes will be incorporated into the PSP DPD due to be adopted on October 2015. Without prejudice to this review the Council's comments on whether there are benefits to defining settlement boundaries are set out above.

## **Q2 Should greater emphasis be given to allocating more housing in the rural areas as suggested by some respondents?**

Council response – No.

- 2.1 The Council has considered alternative development strategies for South Gloucestershire in the Core Strategy's Sustainability Appraisal (Examination Library Ref: SD6), including a dispersed strategy which would provide more development in the rural areas. The Council's Matter Statement 7 (Examination Library: Ref: PSM7), identifies the reasons why the Council does not consider the rural areas to be an appropriate and sustainable location for strategic growth.
- 2.2 The level of housing expected to be delivered in the rural areas is set out in Policy CS15 (Distribution of Housing). The rural areas form part of the "Rest of South Gloucestershire" policy area, which also includes Thornbury and Severnside (an employment area for which there are no housing completions or commitments). Appendix A provides the up to date housing figures for the "Rest of South Gloucestershire" and the sub-areas of Thornbury and the rural areas, taking into account information from the Residential Land Availability Survey, April 2012. An updated Policy CS15 will be submitted to the Examination.
- 2.3 The Council considers that the level of completed and committed housing development within the rural areas is such that there is no specific need to allocate further sites beyond existing allocations and commitments. At April 2012 there are 2,429 dwellings either completed or committed in the "Rest of South Gloucestershire" for the period 2006 up to 2026/27 (of which 72% or 1,751 dwellings are in the rural areas sub area). Notwithstanding the fact that South Gloucestershire considers the former Regional Strategy for the South West to carry very little weight as a material consideration, this figure is broadly in line, nonetheless, with the figure of 2,300 dwellings identified for the "Rest of South Gloucestershire" for the period up to 2026 in the Secretary of State's Proposed Changes to the RSS. On balance we therefore

consider the level of growth coming forward in rural areas over the plan period, allowing for any further growth (as set out at paragraphs 2.4-2.7 below), is based on credible and tested policy framework/ decision making basis.

- 2.4 The distribution of housing within the rural areas is defined in Policy CS5 (Location of Development). Housing development of an appropriate scale will be allowed to come forward through development opportunities provided in villages with settlement boundaries for 5 years from the submission of the Core Strategy (March 2011), during which time a review of the approach to rural housing distribution will be undertaken. Any changes to the approach to rural housing distribution will be reflected in the forthcoming PSP DPD, programmed for completion in October 2015. Any changes will come into effect on adoption of the DPD.
- 2.5 Further development may be delivered through Policy CS19 (Rural Housing Exception Sites) including an element of market housing, where it is necessary to facilitate the delivery of affordable housing.
- 2.6 Brownfield sites in the rural areas may also deliver further housing where this accords with guidance in the NPPF.
- 2.7 Furthermore it is anticipated that development will come forward through local initiatives delivered through Neighbourhood Planning and the PSP DPD. Suggested amendments to Policy CS5, to facilitate Neighbourhood Planning, are set out at Appendix B and explained in response to Question 3 below.
- 2.8 The Council considers that the Core Strategy's housing strategy for the rural areas is in accordance with the NPPF. Paragraph 17 (first bullet point) identifies empowering local people to shape their surroundings through local and neighbourhood plans as a core planning principle. This is given further expression at paragraph 54 of the NPPF, which states that local planning authorities in rural areas should be responsive to local circumstances and plan housing development to reflect local needs.
- 2.9 As the Council emphasised, the Core Strategy is a strategic document and as such is not the appropriate mechanism for identifying non strategic rural housing allocations.
- 2.10 In summary, the Council does not consider it is necessary or appropriate to allocate more housing in the rural areas. The level of housing coming forward in the rural areas is appropriate for the reasons set out above and the Council is of the opinion that its strategy for the rural areas will deliver housing in accordance with the NPPF and reflects the aims of the Government's Localism Act.

**Q3 Does the policy allow sufficient scope for the needs of local communities to be met including affordable housing or provision for the elderly?**

Council response – Yes, subject to a number of amendments to Policy CS5 and Policy CS19.

- 3.1 The Council considers the most appropriate approach to bringing forward local development initiatives (including affordable housing, provision for the elderly and other proposals such as community facilities and employment land) would be by supporting and empowering rural communities to develop their own proposals. As set out in Core Strategy the options for doing this are through the opportunities provided

by Neighbourhood Planning (Neighbourhood Plans, Community Right to Build and Neighbourhood Development Orders) and or for the delivery of non strategic development proposals (for example affordable housing, housing for the elderly, appropriately scaled employment development community facilities etc), through the forthcoming PSP DPD.

- 3.2 In accordance with the NPPF (paragraph 184) Neighbourhood Planning proposals are required to be in general conformity with strategic policies of the Local Plan. In this case this would be Policy CS5 (Location of Development), Policy CS19 (Rural Housing Exception Sites) and Policy CS34 (Rural Areas) of the Core Strategy. To ensure that these strategic policies will enable rural communities to bring forward their local initiatives the Council is proposing a number of further changes to Policy CS5 (set out in Appendix A of this Statement) and to Policy CS19 (set out in Appendix B to Matter 11 (Examination Library Ref: PSM11)). To ensure that Neighbourhood Plans are recognised as forming part of the development plan for South Gloucestershire a change is proposed to Policy CS34, as set out in Appendix B.
- 3.3 Affordable housing can also be delivered through Policy CS19 and Policy CS18 (Affordable Housing), where rural market housing sites meet the thresholds identified in the Policy.
- 3.4 Development opportunities will also be available within villages with settlement boundaries where provision for the elderly may be appropriately located, although this approach to the distribution of rural housing is to be reviewed.
- 3.5 In summary the Council is confident that Policy CS34 in combination with Policies CS5 and CS19 as proposed to be modified, together with the opportunities offered by Neighbourhood Planning and the PSP DPD will allow for the needs of local communities to be met.

**Q4 Is there too much emphasis on affordable/specialist housing in rural areas rather than market housing?**

Council response – No.

- 4.1 Policies CS5 and CS34 have been constructed to achieve both market and affordable housing. However there is a strong need for affordable housing in the rural areas – which our local communities have told us is really the type of housing that is needed to help support many of their communities.
- 4.2 Of the 936 completions in the rural areas between 2006 and April 2012 134 units are affordable and of these 122 have been delivered on large sites. There are 164 affordable units identified on large sites as commitments and 5 affordable units committed on small sites. In addition there is permission for 5 key worker units.
- 4.3 The Core Strategy allows for market housing to be delivered through a number of mechanisms:
  - Through development of an appropriate scale within villages with settlement boundaries. This approach to rural housing distribution is to be reviewed after 5 years (from the date of submission) and any changes reflected in the PSP DPD;

- Rural communities may identify a need to provide additional market housing and deliver this through Neighbourhood Plans;
- Non strategic market housing sites may come forward through site allocations in the PSP DPD;
- A small amount of market housing may be delivered through Policy CS19 (Rural Housing Exception Sites) where it is necessary to facilitate the delivery of affordable housing; and
- Market housing may also come forward on brownfield sites, where this accords with guidance in the NPPF.

4.4 The Core Strategy allows for affordable housing to be delivered through a number of mechanisms:

- Policy CS18 (Affordable Housing), where rural market housing sites meet the thresholds identified in the Policy;
- Policy CS19 (Rural Housing Exception Sites);
- The PSP DPD; and
- Neighbourhood Planning.

4.5 In summary the Council is of the opinion that the Core Strategy, balancing appropriate sustainability considerations, allows for the delivery of both market and affordable housing and that there is not “too much emphasis” placed on delivering affordable housing, given the strong need for affordable housing in the rural areas. The Council believes its approach to affordable housing is appropriate and commensurate.

**Q5 Should a more positive approach be taken to allow brownfield sites in rural areas/green belt locations to be re-used?**

Council response – No.

5.1 The Council is of the opinion that it is not appropriate or necessary to specifically provide a more positive approach to brownfield sites in the Core Strategy.

5.2 The Core Strategy addresses strategic matters. The need for a more positive approach to the development of brownfield sites in rural areas/green belt locations has not been identified as a significant or strategic issue in South Gloucestershire during any of the engagement and consultation stages of the Core Strategy. This matter has therefore not been specifically addressed in the rural section of the Core Strategy.

5.3 However Policy CS9 (Managing the Environment and Heritage) promotes the re-use of contaminated land with appropriate remediation and at paragraph 8.14 the Core Strategy addresses the benefits of recycling previously development land, whilst ensuring that there is no significant impact on biodiversity.

- 5.4 Furthermore the Council considers that paragraphs 17 (bullet point 8), 81 and 89 (bullet point 6) of the NPPF provides sufficient guidance with regard to this matter and adding further guidance to the Core Strategy would be unnecessary duplication.
- 5.5 Should a local community have specific proposals for a brownfield site this could be positively addressed through Neighbourhood Planning. Alternatively brownfield sites could be brought forward through the PSP DPD and at the Development Management stage a positive approach to the development of a brownfield site could be defined in Concept Statements and Development Briefs.
- 5.6 In summary the Council does not consider that this matter is a strategic issue for South Gloucestershire. There is sufficient guidance on how to deal with brownfield land in the NPPF. Specific proposals for brownfield sites could come forward through Neighbourhood Planning or the PSP DPD and at the Development Management stage via Concept Statements and Development Briefs.

## **Q6 What role is envisaged for neighbourhood plans in bringing forward local development initiatives**

### Council response

- 6.1 The Council's preferred approach to bringing forward local development initiatives would be by supporting and empowering rural communities to develop their own proposals through the options provided by Neighbourhood Planning (Neighbourhood Plans, Community Right to Build and Neighbourhood Development Orders). The Council considers that this is in accordance with the first of the core land use planning principles set out in paragraph 17 of the NPPF.
- 6.2 To facilitate this approach the Council is participating in the Government's frontrunner scheme for Neighbourhood Planning, by supporting Hanham and Hanham Abbots in the delivery of their Neighbourhood Plan. In addition the Council has developed a programme of training events on Neighbourhood Planning designed for Ward Councillors, Parish and Town Councillors and other interested groups from the urban areas and is to launch a web page to provide additional guidance and useful sources of information. A corporate approach to supporting Neighbourhood Planning across the Council is being developed.
- 6.3 As explained in paragraph 3.1 above, in order to ensure that the Core Strategy provides strategic policies which will enable local communities to bring forward their development initiatives, a number of further changes are proposed in Appendix B to Policy CS5 (Location of Development) and to Policy CS19 (Rural Housing Exception Sites), as set out in Appendix B to Matter 11 (Examination Library Ref: PSM11). To ensure that Neighbourhood Plans are recognised as forming part of the development plan for South Gloucestershire a change is proposed to Policy CS34, as set out in Appendix B.
- 6.4 If after considering the options offered by Neighbourhood Planning Parish and Town Councils decide that they do not wish to go down this route, they will be able to progress any local development initiatives they may have through the Council's PSP DPD.

6.5 In summary the Council envisages Neighbourhood Planning playing a key role in bringing forward local development initiatives in the rural areas. If Parish and Town Council do not wish to progress their local development initiatives through Neighbourhood Planning then the Council's PSP DPD provides an alternative route.

## **7.0 Conclusion**

7.1 The Council believes that the Core Strategy's approach to the rural areas will ensure that locally based growth will be delivered through Neighbourhood Planning and the PSP DPD as appropriate, whilst also offering a number of alternative avenues for the provision of affordable housing, elderly persons housing and market housing. The Inspector is respectfully asked to take the matters set out in this paper into consideration.

## Appendix A

### Housing Figures for the “Rest of South Gloucestershire”<sup>1</sup>

“Rest of South Gloucestershire” (total figure of 26,400 dwellings for District up to 2027)	Dwelling numbers	Sub Totals	RSS SOS’s Proposed Changes figure for “Rest of South Gloucestershire” (total figure of 32,800 dwellings for the District up to 2026)
Rural Areas Completions 2006 - April 2012 large sites	427		
Rural Areas Completions 2006 - April 2012 small sites	509		
Rural Areas RLAS - April 2012 Commitments <sup>2</sup> - large sites	330		
Rural Areas RLAS - April 2012 - small sites	235		
Rural Areas Windfalls allowed under NPPF <sup>3</sup>	250		
<b>Rural Areas Sub Total</b>		<b>1751</b>	
Thornbury Completions 2006 - April 2012 - large sites	90		
Thornbury Completions 2006 – April 2012 small sites	49		
Thornbury RLAS – April 2012 Commitments - large sites (Policy SC33)	500		
Thornbury RLAS – April 2012 Commitments - small sites	19		
Thornbury windfalls allowed under NPPF <sup>2</sup>	20		
<b>Thornbury Sub Total</b>		<b>678</b>	
<b>Total</b>	<b>2,429</b>	<b>2,429</b>	<b>2,300</b>

<sup>1</sup> The “Rest of South Gloucestershire” area includes the rural areas, Thornbury and Severnside (which is an employment area, where there are no housing completions or commitments).

<sup>2</sup> “Commitments” are defined as units with permission, but not started or under construction and “Category B sites without planning permission”. Category B sites are defined in the South Gloucestershire Residential Land Availability Survey as land identified for residential development either through a Committee resolution to grant planning permission subject to the completion of a Section 106 Agreement; an allocation in the South Gloucestershire Local Plan, or a proposed allocation in the South Gloucestershire Core Strategy. Sites progressing through the planning application process and sites where a previous planning permission has lapsed but where permission could normally be expected to be renewed are also been included in this category.

<sup>3</sup> Calculated on past small sites completions with a discount for development in gardens.

## Appendix B

### Suggested Modifications to Matter 25 – Rural Areas

Para/ Policy	Proposed Modification	Justification	Main (M) or Additional (A) Modification
CS5 (p55)	<p>5. ...</p> <p><b><u>(a) Small scale development will take place within the defined settlement boundaries of villages defined on the Proposals Map, but will be limited in scale to no more than infilling within those villages with defined settlement boundaries washed over by the Green Belt. <i>Small scale development within and well related to settlement boundaries may also come forward through Neighbourhood Planning initiatives and rural housing exception site policy;</i></u></b></p> <p>...</p> <p><b><u>(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 initiatives and rural housing exception site policy; and</u></b></p> <p><b><u>(c) in the open countryside, new development will be strictly limited.</u></b></p>	To ensure that Neighbourhood Planning and rural exception site policy forms part of the strategy and policy for the rural areas	M
CS34 (p193)	<p><b>Local Development Documents and development proposals will take account of the vision for the rural areas and partnership priorities, <i>including Neighbourhood Planning accord with Neighbourhood Plan initiatives</i> and will:</b></p>	To ensure that Neighbourhood Plans are recognised as part of the development plan	M