



**SOUTH GLOUCESTERSHIRE CORE STRATEGY  
CONSULTATION ON INSPECTOR'S FURTHER MAIN MODIFICATIONS  
REPRESENTATIONS SUBMITTED BY RPS ON BEHALF OF  
CREST STRATEGIC PROJECTS (APRIL 2013)**

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- 1) We write on behalf of our client, Crest Strategic Projects (CSP) in respect of the Council's invitation for comments on the Inspector's Further Main Modifications to the South Gloucestershire Core Strategy. CSP has controlling interests over land within the proposed East of Harry Stoke New Neighbourhood and therefore represents a key stakeholder in delivering the level of development growth envisaged in the plan.
- 2) We welcome and support the majority of the Inspector's Main Modifications which address soundness. Accordingly these representations only address one main modification where RPS has residual concerns and can suggest potential amendments to improve clarity and consistency between the modifications and the remainder of the plan. For the avoidance of doubt, RPS supports all of the main modifications that are not referenced below.

**Main Modification 23: Policy CS27 (East of Harry Stoke New Neighbourhood)**

- 3) RPS objects to the proposed additional policy wording to Policy CS27 that states,  
  
***'Development of the new neighbourhood will not come forward until the programmed delivery of the Stoke Gifford Transport Link has been secured.'***
- 4) The front cover of the Further Modifications notes,  
  
***'The Further Main Modifications listed below represent changes made as a result of responses received to the draft Main Modifications (MM)....'***
- 5) RPS is not aware of any representations submitted to the MM that sought this change. Certainly it was not in the Council's submission and was not in our own. Indeed, RPS sought an entirely different approach that recommended the deletion of the other supporting paragraphs of the plan (paragraphs 1.37 and 4.17) which the Inspector is now seeking to find consistency with.
- 6) Of course, we readily acknowledge that the Inspector is more than entitled to take a different view to our own, however, the implications of reinstating this policy wording 'for the purposes of consistency' are significant. As SGC's 'developer partner' for the delivery of the East of Harry Stoke New Neighbourhood we have worked with SGC to ensure that the policy does not present any significant barriers to development. Through earlier drafts stages of Core Strategy preparation we

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have consistently argued that the policy wording now reinstated is deeply unhelpful for both the delivery of the SGTL and the New Neighbourhood itself.

- 7) In itself the policy wording is vague; it is far from clear what constitutes 'programmed delivery' and how much of a barrier to development it might present. Moreover, the policy wording is unhelpful for both SGC and CSP insofar as by linking the two developments (SGTL and New Neighbourhood) both are potentially prejudiced. SGC will be submitting an application for the SGTL imminently and assuming the application is approved, will be commencing CPO procedures to secure the land. That will involve complex negotiations with landowners and in order that CPO requirements are fulfilled (i.e. costs are minimised), it is essential that the SGTL is presented as a strategic link rather than one that also serves development.
- 8) That is a very simple summary of a hugely complex matter that we have been working with SGC on since the first iteration of the Core Strategy was published. Whilst ultimately the two developments do go hand in hand, delivery of the 2,000 homes is not dependant on the SGTL, particularly in the early phases of development. Whilst detailed transport modelling is ongoing, it is clear that a significant proportion of homes can be built before the SGTL has to be in place. It is for these reasons that the wording has been deleted from Policy. Given the Council's housing trajectory it cannot wait for the SGTL to be in place before homes need to be delivered.
- 9) In our representations on the original MM we simply sought to ensure that the entire Core Strategy was consistent with Policy CS27. Policy CS5, and paragraphs 6.6 and 12.7 had already been amended, and the revisions to paragraphs 1.37 and 4.17 would have tied up the 'loose ends'.
- 10) If the Inspector was minded to disregard this advice, we would draw his attention to the companion 'minor changes' document that SGC has produced alongside the Further Modifications. SGC has provided further clarity at supporting paragraph 12.26 of the Core Strategy (related to the specific New Neighbourhood policy CS27):

***'Delivery of the Stoke Gifford Transport Link is a primary objective of the Council. The Council is now taking this project forward as part of the North Fringe – Hengrove Package major scheme bid to the Department for Transport. A local contribution will be necessary, primarily from the private sector. The Council is also investigating***

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***other funding sources. Having completed Programme Entry the council considers that in broad terms the resources needed have been achieved to secure programme delivery of the SGTL. Programme delivery will therefore be considered to have been achieved when all the required resources are committed.***

- 11) This is a very helpful addition to the Core Strategy that we fully endorse. In many respects, it resolves the ambiguity associated with the term 'programmed delivery', however, in doing so ultimately renders MM23 redundant (and the relevant elements of paragraphs 1.37 and 4.17). If programmed entry has already been secured then there is no need to reference it within Policy CS27. The Core Strategy should be prepared with the intention of being concise and provide clarity to the reader. The Core Strategy is now internally inconsistent and we strongly urge the Inspector to respond positively to our original submission on the Main Modifications, rehearsed again below.

### **Recommendations**

#### **Deletion of Further Main Modification 23**

~~'Development of the new neighbourhood will not come forward until the programmed delivery of the Stoke Gifford Transport Link has been secured.'~~

#### **Paragraph 1.37:**

~~".....Provision will also be made for a major mixed use development of 2,000 dwellings with associated infrastructure on land east of Harry Stoke, extending south from Winterbourne Road to the A4174 Avon Ring Road. Development of the new neighbourhood will not come forward until the programmed delivery of the Stoke Gifford Transport Link has been secured. In the East Fringe of Bristol....."~~

#### **Paragraph 4.17:**

~~"....The need for housing and to ensure sustainable development and sustainable communities, in combination with the impact of the Stoke Gifford Transport Link are the exceptional circumstances in which land will be removed from the Green Belt at this location to deliver a new neighbourhood. Development of the new neighbourhood will not come forward until the programmed delivery or construction of this route has been secured. The new neighbourhood, comprising 2,000 homes....."~~