

Introduction

The Council published the latest set of Inspectors main modifications in March 2013 and comments are requested by 3th May 2013. Separate comments are made in relation to the 2011 based interim Household Projections. Strategic Land Partnerships has submitted representation at every stage of the plan making process and has attended the examination hearing sessions in respect of its interests in land at Oldland Common. It is disappointing that the Inspector believes that the Core Strategy can be made sound with these modifications. We do not agree with this approach and restate our concerns that the strategy being pursued is the wrong strategy and that it will not adequately meet the needs of the population of South Gloucestershire and also the needs of the East of Bristol.

As it stands the plan is evidently unsound because it does not set out the objectively assessed need and has not been positively prepared. It is required to do this by the NPPF. Paragraphs 7 states that 'Planning should... deliver the homes, business and industrial units, infrastructure and thriving local places that the country **needs**. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.'

The Council is not being positive in seeking to meet a clearly stated objectively assessed need. It has not identified what is required through an assessment of need using a Strategic Housing Market Assessment (SHMA) across the whole housing market area. Other plans have been found unsound on this basis and given the failings of this plan it is illogical to do anything other than find this plan unsound. Instead of planning positively for the full need that exists and identifying the scale, mix and range of tenures that the local population is likely to need over the plan period the Council is seeking to 'make do', by its somewhat creative calculations of provision, and by adding sites in piecemeal. This is not a positive approach which delivers a proper strategy and one that properly and positively set out the best strategy to achieve sustainable development and deal with South Gloucestershire's place and role in the West of England.

Whether or not this plan is in place will make no difference whatsoever to whether enough development comes forward nor which development takes place. This is because the plan is merely a catalogue of what developers want to do which the local authority has identified as acceptable. If the plan is allowed to be adopted, it will put off the preparation of a proper a spatial strategy to set in place planning for sustainable patterns of development for the long term and for the proper functional area of the West of England.

The inclusion of the idea of a review which does not commit the Council, let alone those that it has to work with is a completely inadequate substitute for what the Framework clearly and unequivocally requires from local planning authorities. There is no reason why this type of

evasive plan making should be tolerated or condoned. The plan should not be found sound when on the basis of what it contains it isn't.

The following comments are made on the specific modifications being proposed:

MM7 – Policy CS5 Location of Development

The modifications seek to delete the whole of criteria 7 relating to non strategic changes to the green belt. This is replaced with criterion 6a which sets out that small scale infill may be permitted within settlement boundaries which will be reviewed through the Policies, Sites and Places DPD or a replacement Local Plan. This criterion is now exactly the same as criterion 5a relating to areas outside the greenbelt. This is illogical as settlements outside the green belt should benefit from a more positive approach to development. Leaving the review of settlement boundaries to either a DPD or replacement plan, to be prepared at an unspecified date is inappropriate. It does not provide the certainty required for developers or the public and does not provide a sound basis on which to plan for settlements within or outside the green belt.

Leaving any review of settlement boundaries to a future date provides them with no ability to bring forward development that will support their existing communities and respond to the needs of the population. The policy should at the very least set out an indicative timescale for the review of settlement boundaries and be more specific about whether it will be carried out in the Policies Sites and Places DPD or the replacement Local Plan and when that will take place.

MM15 – Policy CS15 Distribution of Housing

The policy now sets out a revised figure for the amount of housing to be provided over the plan period up to 2027. The first part of the policy states that this will be a minimum of 28,355 new homes. This figure is then explained in detail in the table where there is a different figure of 28,830 set out. It is not clear why these two figures are different.

Objection is made to the figures within the policy for the following reasons:

It does not represent an objective assessment of need as required by the NPPF. Paragraph 47 is clear that 'authorities should use their evidence base to meet the full objectively assessed needs for market and affordable housing in their housing market area'. The scale and mix of housing has not been informed by the preparation of an up to date SHMA prepared for the whole Housing Market Area. Paragraph 159 of the NPPF is clear that authorities should prepare a SHMA and work 'with neighbouring authorities where housing market areas cross administrative boundaries'.

The figures are dependent on the north and east fringes of Bristol to deliver the majority of the dwellings (16,760). These locations will provide over 70% of all the new dwellings to be provided over the plan period. This strategy is flawed because it focuses on only a small

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part of the district and relies on this area to deliver considerable housing. Of the remainder 3,460 dwellings is allocated at Yate and Thornbury. We object to the inclusion of Morton Way North, Thornbury as an additional site allocation. Further detail is provided in the comments to MM26 in relation to policy CS33. Only 5% of the dwellings are allocated for the whole of the rest of South Gloucestershire. This strategy means that a large proportion of the existing population are not being provided with the opportunity to enter new housing to meet their needs close to where they live. In addition a very significant number of houses are coming forward in the same market area with little flexibility and choice as required by the NPPF. It is doubtful that these few sites within the same area can deliver the quantity of housing set out in the plan and required by the five year land supply.

In particular there is very little provision for the East of Bristol and no recognition of the needs of the population of the East Fringe of Bristol around Oldland Common.

We are concerned that a full windfall allowance of 750 is included within the first five years of the plan. This is not a sound approach and should be discounted to ensure that there is no double counting between the existing commitments and sites with planning permission at 2012. It is suggested that the first 2 years should be excluded so that the windfall allowance would only run from 2015 - 2107 and would be 450 units.

We are pleased to see that a 20% buffer has been included within the figures because of the under provision that has been experienced within South Gloucestershire over the last five years. This is clearly required because only 4,990 dwellings have been completed since 2006. This is only 17% of the total and given that it represents nearly a third of the plan period is woefully inadequate to meet the needs that exist. Consequently, a considerable step change in delivery is required. The strategy which focuses development on a few locations will not allow the market to deliver this level of increased supply. Given the lack of choice and location of sites it is also considered that this buffer does not adequately perform the role set out in paragraph 47 of the NPPF which is to 'ensure choice and competition in the market for land'. Paragraph 10.7 states that the additional site at Morton Way North in Thornbury is necessary to provide a 20% buffer. However, using another site at Thornbury does not adequately provide more choice and competition as required by the NPPF, rather it continues to identify a further site in the same location as the majority of the allocations. This failure to accord with the NPF means that the choice of site location is flawed and does not represent the best option when considered against appropriate alternatives. The site at Oldland Common would more effectively meet the requirements of the buffer because it serves a different part of South Gloucestershire and is seeking to meet the needs that are arising from the East of Bristol. Therefore it provides for true choice, competition and delivery because it is available and viable for development now. Consequently, it is suggested that all references to Morton Way North is deleted and are replaced by Oldland Common.

It is noted that the policy no longer includes a commitment to review the 'appropriate level of new homes prior to 2021'. Objection is made to the deletion of this commitment at the bottom of the table in the policy. It is imperative that the scale of housing is regularly

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reviewed and compared with latest population and household projections as well as delivery rates and jobs growth figures. Inclusion of a commitment to review within the text at 10.6bii is not enough. It is considered that a review should take place far sooner than 2021. The revised household projections are expected in 2015 and these will cover a longer period and will represent a robust data source on which a review would be well based. A West of England SHMA is an essential piece of evidence which is required now to understand what the objectively assessed need is. There is no reason or justification for putting this off to a later date, and while it should have been done to inform this plan, it must be done as soon as possible to inform the review of all the plans within the West of England. Consequently, the policy should clearly state that 'a review will take place in 2015 using a West of England SHMA to inform the appropriate level of new homes'.

MM26 – Policy CS33 Housing Opportunity

Objection is made to the identification of a further site off Morton Way North, Thornbury. While we agree that a 20% buffer is required and that further sites need to be allocated to meet this, it is not considered that this site meets the requirements of the NPPF. The purpose of the buffer is set out within paragraph 47 of the Framework. It states that a buffer is required to 'ensure choice and competition in the market for land'. As set out in our comments on the changes to Policy CS15, we do not consider that allocating a further site at Thornbury achieves the objectives of the buffer. The addition of a further site at Thornbury provides for even more land in the same location as the majority of the allocations within the plan. It does not represent the most appropriate site because it concentrates development and does not provide choice in the market for land. This failure to accord with the NPF means that the choice of site location is flawed and does not represent the best option when considered against appropriate alternatives.

In order to adequately meet the aims of the buffer as required by the NPPF the site should provide real choice and completion. Consequently we believe that the site at Oldland Common represents a far more appropriate location because it serves a different part of South Gloucestershire and is seeking to meet the needs that are arising from the East of Bristol. Therefore it provides for true choice, competition and delivery because it is available and viable for development now. Consequently, it is suggested that all references to Morton Way North is deleted and are replaced by Oldland Common.