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**Delivered by Email and Post**

Strategic Planning Policy and Specialist Advice Team  
South Gloucestershire Council  
PO Box 2081  
South Gloucestershire  
BS35 9BP

Dear Sirs

**FURTHER MAIN MODIFICATIONS TO THE SOUTH GLOUCESTERSHIRE CORE STRATEGY  
REGIONAL STRATEGY REVOCATION AND HOUSEHOLD PROJECTIONS CONSULTATION**

Further to the request for comments from the Inspector please find below responses on behalf of **Persimmon Homes and Ashfield Land**.

**Further Main Modifications**

As we have submitted to the Examination previously we consider that:

- The overall housing quantum should be increased to ensure that there is sufficient housing delivery during the plan period;
- Additional available and deliverable sites should be identified to ensure that the Council can meet both the short term and longer term need/demand for housing.

***Policy CS15 – Distribution of Housing***

We note that a recent appeal decision at Engine Common (ref APP/P0119/A12/2186546) found that the Council is unable to deliver a five year supply of land for housing. As a result we look forward to the Council dealing expeditiously with planning applications on sites which are identified in the Core Strategy, including our client's land at Wyck Beck Road/Fishpool Hill that is within the CPNN. The Inspector will be aware that Policy CS15 requires the delivery of 1,093 homes as part of the CPNN by April 2017. Our client's application remains the only planning application that has been submitted at the CPNN, and this site will be critical in meeting the projected delivery for this area.

***Policy CS33 – Housing Opportunity (Thornbury)***

The further proposed modifications identify an additional development site at Morton Way North for some 260 dwellings; however this proposed allocation has been inserted without any reference to specific requirements for this development, or reference to other policies within the plan. Either the allocation should be identified at the beginning of the policy so that the subsequent provisions within CS33 apply, or a separate/additional list of specific policy provisions for this allocation should be added.

## **Revocation of South West Regional Strategy**

The Regional Strategy – RPG10 remains part of the Development Plan and is therefore (part of) the starting point for the determination of planning applications, furthermore the Draft South West RSS 2006-2026 (and the evidence which lies behind it) remains a significant material consideration in the determination of planning applications (particularly in those areas where up to date plans are not in place). However the Government's intention to revoke Regional Strategies has been known for some time and progress on the Draft RSS ceased. The Council and other participants in the process have been aware of this position during the preparation of the Core Strategy and the new national planning policy (The NPPF) has been clearly in mind during the recent (and on-going) preparation and examination process (if not the earlier stages).

However, just because a Regional Strategy has (or will be) revoked does not necessarily mean that the evidence base which underpinned its policies is no longer applicable (something that has been confirmed by a number of recent appeal decisions). Information in respect of population, housing and the environment is likely to remain relevant and point towards consistent outcomes in terms of planning policy for sustainable development.

The potential adoption of this and other post NPPF Core Strategies will represent somewhat of a clean break from the 'old' to the 'new' planning policy position (without the regional tier) – on the basis that newly adopted Core Strategies (and Local Plans) will need to meet objectively assessed development needs, and be positively prepared based on the duty to co-operate. Accordingly the continued relevance of Regional Strategies will diminish further after this point, save to the extent that the previous policies reflected evidence and circumstances that are likely to prevail and remain relevant within 'new' development plan documents.

The potential revocation of the South West Regional Strategy - RPG10 (and by association the final cessation of the Draft South West RSS process) therefore has only limited relevance to the on-going Examination and the overall 'soundness' of the Core Strategy. This is so long as the plan is meeting the relevant soundness tests now embodied within the NPPF; specifically the requirement to be 'positively prepared', to include a presumption in favour of sustainable development and ensuring that the objectively assessed need for development is being met. As previously stated our view and that of many other participants is that further changes need to be made to the strategy to meet these tests. In particular there is a need to increase the overall housing numbers and identify additional deliverable sites for development. If this is not done then we reiterate that it would then be necessary for the Council to pursue an early review of the plan no later than 2016.

## **CLG Household Projections 2011-2021**

The amount of weight that should be given to the headline findings of this dataset (not least the reduced level of projected household formation nationally, compared to the previous 2008 based projections), is indicated by their 'Interim' status. The projections only provide a ten year horizon, 2011 to 2021. In contrast the RSS evidence base and policies do indeed provide for a longer time horizon until 2026. This represents a challenge for providing longer term estimates of demand required to match a Local Plan minimum period of 15 years. The more refined 2012-based Official projections, which will include the usual 25 year projection horizon, are not expected for another year (Spring 2014). When available these projections will integrate new mid-year estimate datasets from the ONS as well as more detailed inputs from the 2011 Census. The 2012 based official projections are therefore likely to represent a more robust and meaningful input into the plan making process – with the usual caveat relating to their 'trend based'

nature, being based on previous demographic trends. Again this justifies our view for an early review of the Core Strategy based on this up to date evidence, if overall housing numbers are not increased now and additional housing sites brought forward to deliver them.

Any reduced household formation rates are likely to (in part) reflect past poor performance in the delivery of housing. This data set presents a 'future' that assumes that the underlying drivers of the housing market continue to reflect current and recent market conditions. The base date of the projections and indeed the Census year, follows a sustained recessionary period that has had a marked impact on the housing market, levels of transactions and the ability of new households to form, not least as a result of unprecedented low levels of housing completions.

It is essential that the Core Strategy reflects the full objectively assessed need for housing in the area, reflecting the full range of data available, and the government's ambitions for economic growth and sustainable development and to significantly boost the supply of housing. Accordingly as set out in previous representations and evidence to the Examination it is considered that the minimum housing requirement should be increased and these projections do not alter this position.

We hope that the above comments are of use and look forward to receiving further updates on the progress of the Core Strategy Examination.

Yours sincerely



Peter Stacey  
**Director**