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**Delivered by email and post**

Strategic Planning Policy and Specialist Advice Team  
South Gloucestershire Council  
PO Box 2081  
South Gloucestershire  
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Dear Sirs

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

Please see below responses to the above two consultations on behalf of our client **Taylor Wimpey UK Ltd.** These further responses should be read in combination with and in the context of the previous submissions made to the Core Strategy Examination.

### **Further Main Modifications**

As we have submitted to the Examination previously to be made sound 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, including sites within the Green Belt where these represent the most sustainable options (such as the land owned by Taylor Wimpey UK Ltd at Cosham Street .

### ***Policy CS5 – Location of Development***

The further main modifications have made significant changes to this policy removing significant sections in respect of proposed non-strategic changes to the Green Belt, such 'non-strategic' changes are justified by the evidence base as there are locations on the urban fringe of Bristol where smaller (non-strategic) scale development can take place. There was clearly much debate at the Examination over the size of development or site that would be considered to be 'non-strategic' and clearly to an extent this will depend on the location and character of any specific individual site; however we remain of the view that developments of around 120 dwellings within the Green Belt can be considered to be non-strategic in the context of South Gloucestershire and are justified where they would allow sustainable development that does not conflict with the main purposes of the Green Belt. Policy CS5 (as redrafted) will restrict the ability for Neighbourhood Plans to propose development on Green Belt sites, where this represents a logical and sustainable option.

It is also unclear if all settlement boundaries will be reviewed as part of the Policies, Sites and Places DPD or only those relating to 'villages' within the Green Belt. All development boundaries should be reviewed

concurrently with a review of the detailed extent of the Green Belt boundary (rather than necessarily any review of its general extent – although this may well also be necessary).

As previously identified, and is reiterated for clarity, Taylor Wimpey UK Ltd own land at Cossham Street Mangotsfield that could accommodate development in the order of 120 dwellings without adverse impact on the purposes of the Green Belt in this location.

### **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.

### **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. 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.

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. 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



Alistair Macdonald  
**Associate Director**