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Strategic Planning Policy  
and Specialist Advice Team  
South Gloucestershire  
Council  
PO Box 2081  
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22nd April 2013

Dear Sir/Madam,

**South Gloucestershire Core Strategy:**

**Response to the Consultation on the Inspector's Further Main Modifications, March 2013**

**Additional comments relating to Implications of New ONS Household Projections and the Decision to Revoke the Regional Spatial Strategy for the South West**

CPRE South Gloucestershire District Committee wishes to comment on the Inspector's Further Main Modifications to the Core Strategy. We also wish to make representations about the effects of the decision to revoke the Regional Spatial Strategy for the South West and the implications of the ONS Household Projections 2011-2021. As these have a bearing on our comments on the Main Modifications, as well as on the Core Strategy itself, we have included them in a single document.

**THE INSPECTOR'S FURTHER MAIN MODIFICATIONS**

**MM7 Appendix B Policy CS5 Location of Development**

We agree with the modifications removing the criteria in paragraph 7 for considering non-strategic changes to the Green Belt and the reference to allowing development in Green Belt locations except in the two locations identified, or for small scale infill within settlement boundaries. This removes the previous contradiction with the text of the NPPF.

However we are still of the view, and particularly in the light of the most recent government data (discussed below), that a further modification is required which would allow a reversion to South Gloucestershire Council's original intention in the pre-submission Publication Draft, March 2010 (policy CS26 and Figure 6) that the Green Belt land to the west of the A4018 should be retained, or at least that a sequential approach should be introduced, not least because this land is separate from the main Cribbs/Patchway new neighbourhood area, was not judged as sustainable in the

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Sustainability Appraisal, and because Bristol City Council also have strong objections to its loss as Green Belt land on the fringe of the city.

We feel that regard should be given to the notes to the Press Release of 27<sup>th</sup> March 2013 on the Secretary of State's proposed revocation of the RSS for the South West of England, which again stress the importance that the Government places on the Green Belt.

#### **MM15 Appendix D Policy CS15 Distribution of Housing**

While we recognise that the Council has an obligation to provide a 5 year housing land supply and that a 20% "buffer" is required, we consider that the modified figures and the phasing capacity should be subject to further scrutiny. This has now become a more crucial issue in the light of recently published Government data. We comment further on the implications for policy CS15 below.

**Paragraph 10.6bii Additional text referring to a revised SHMA.** We agree with the need for a revised SHMA. However in the light of the emerging data which we comment on below, and the fact that figures show considerably reduced household projections for all the neighbouring local authorities, we do not consider that this paragraph should refer to a requirement for "additional strategic provision" or the need to review the existing Green Belt.

#### **IMPLICATIONS OF THE ONS HOUSEHOLD PROJECTIONS 2011-2021**

While CPRE firmly considers that planning for housing provision should not purely be treated as a numbers game, and that projections are only part of the picture, there is clearly a need for such figures to be used as one part of the evidence base, indeed the NPPF requires this.

"The National Planning Policy Framework requires that assessment of future housing requirements in local spatial strategies should have regard to current and future demographic trends and profiles and take into account evidence including the Government's latest published household projections". (Households Statistical Release p.20)

The Live Tables on Household projections contained within the Household Projections 2011-2021 clearly indicate (Table 430: Comparison between 2011 based projections and 2008 based projections) that the 2008 based data presented a major over-estimate in the projected numbers of households in South Gloucestershire to 2021.

Given that the projected average annual increase in households has been reduced from 2,000 to 1,000, this must have considerable implications for data on housing need within South Gloucestershire during the period of the Core Strategy, and thus on the modifications which have been made to Policy CS15.

It is clear that South Gloucestershire Council were correct in their assessment in the March 2011 "Justification for the Strategy for Housing to 2026" (Examination Library document EB21) that the



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2008 based Household Projections were over-estimates and that their original figure of 21,500 houses, which was based on robust evidence, more closely matches the level of need over the period of the Core Strategy.

### ADDITIONAL CENSUS DATA

The evidence base for the Core Strategy also included the West of England SHMA for 2009, which, it can be argued, is also likely now to be unreliable for current planning for future housing provision. The SHMA itself refers to the need to take account of characteristics of the housing market. Once again recently published (19<sup>th</sup> April 2013) 2011 Census data on Home ownership reveals the first fall in home ownership over the past decade since 1918. South Gloucestershire is not immune from national trends. Austerity budgets are planned to continue beyond 2015, potential homeowners are leaving it later before they purchase and couples are delaying having families. We are concerned about the potential for an over-supply of market housing coming forward, especially in the short to medium term, which rather than stimulating the local economy has the opposite effect.

If Policy CS15 is based as stated on the “plan, monitor and manage” approach, then we consider that further measured consideration of projected total housing numbers and the phasing capacity is required. It is important that a well-founded Core Strategy is adopted as soon as possible to avoid piecemeal development and decisions by appeal, unless the Government give local authorities a longer time scale to put well thought out local plans in place. However it would be unwise to place over-reliance on data which is not now robust, if the plan which will affect the quality of life of present and future residents of South Gloucester is to be truly “sound”.

### IMPLICATIONS OF THE SECRETARY OF STATE’S DECISION TO REVOKE THE REGIONAL SPACIAL STRATEGY (RSS) FOR THE SOUTH WEST

While it was argued during the gestation of the Core Strategy that the intention to revoke the RSS meant that it was no longer a material consideration and the data contained in it should be ignored, some parties continued to maintain that it still had relevance. We consider that this latter approach is now totally invalid. The Secretary of State’s most recent comments about the “flawed top-down targets of regional planning” and the Press Release statement that “the abolition of these unpopular and counter-productive Regional Strategies reinforces the importance of councils’ Local Plans produced with the involvement of local communities, as the keystone of the planning system” clearly indicate that the RSS should be disregarded (apart from the specific Green Belt safeguard).

This has further implications for older documents in the Evidence Base for the Core Strategy, including the West of England SHMA which referred to data contained in the RSS.

Yours sincerely  
JR Kempshall, CPRE South Gloucestershire District Committee

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