

Introduction

The Council published the latest set of Inspectors main modifications in March 2013. Comments are requested by 3th May 2013. In addition separate comments are made in relation to the 2011 based interim household projections. 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 particularly the needs of the rural communities.

There are major shortcomings in the plan which means that it is unsound because it does not do what is required by the NPPF. In particular it has not been positively prepared and does not set out, let alone meet, the objectively assessed need to identify the scale, mix and range of tenures that the local population is likely to need over the plan period.

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. We are concerned that the important issue of settlement boundaries has not been addressed properly. Leaving this to either a DPD or replacement plan, to be prepared at an unspecified date is inappropriate and does not provide a sound basis on which to plan for the rural areas. In addition it is not justified and would be ineffective which is contrary to the tests of soundness set out in the NPPF.

The villages within South Gloucestershire are significantly disadvantaged from the spatial strategy being proposed in the plan and its policies. In particular the objectively assessed need in these areas is not being met which is contrary to the requirements of the NPPF. There is little, if any, acknowledgement of the important role that these villages and rural communities play and the needs that they are experiencing. 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. This is likely to lead to a number of adverse consequences including worsening unaffordability and widening inequality as well as threatening the viability of local services and facilities, all of which are contrary to the achievement of sustainable development are required by the NPPF. 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 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. 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 rural communities and no recognition of the needs of the population of the villages that exist within South Gloucestershire.

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.

The NPPF requires Local Authorities to identify and keep up-to-date a deliverable five year housing land supply. We do not agree that South Gloucestershire can demonstrate that they have a deliverable supply of sites because of the considerable reliance on sites without planning permission.

We are pleased to see that a 20% buffer has been included within the figures because of the underprovision 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. 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'.

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 and a requirement of the NPPF that the scale of housing is regularly 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'.

MM18 – Policy CS20 Extra Care Housing

The Council is right to recognise that there is a need to provide Extra Care Housing to meet the emerging need. It specifically includes provision within the new neighbourhoods as an integral part of these developments. However, within the rural areas and specifically the villages it does not provide any land on which this form of housing can be accommodated. These locations contain a significant number of elderly residents who would benefit from these types of extra care schemes.

The new paragraph seeks to ensure schemes are located so they are accessible to local facilities, proportionate in scale to the locality and provide ancillary facilities. However, we object to this because it does not go far enough. It is considered that reference should also be made to making sites available in suitable locations across the whole of South Gloucestershire to accommodate extra care housing where it is needed. This would help release general needs housing in rural areas.

We welcome the recognition that not all extra care home schemes would be suitable for a contribution to affordable housing under policy CS18. It is entirely appropriate that the



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nature and type of accommodation, is assessed to consider whether an affordable housing contribution is appropriate and viable.

MM27 – Policy CS24 Green Infrastructure, Sport and Recreation Standards

The change proposed to ensure consistency with policy CS5 is objected to on the same basis. Objection is made to the fact that settlement boundaries are to be maintained until they are reviewed in a future plan. Firstly the NPPF requires that plans should be up to date and that land allocations should be regularly reviewed. Secondly in a situation where there is not a deliverable five year supply of housing, recent appeals have shown that there must be flexibility in relation to settlement boundaries. As it currently stands the Core Strategy fails to properly address the important issues, such as local needs and ambitions for growth, faced by settlements with an existing boundary. Leaving this to either a DPD or replacement plan, to be prepared at an unspecified date is inappropriate and does not provide a sound basis on which to plan for the rural areas.

It is suggested that the paragraph should be changed in line with the amendments to policy CS5 set out above. As such it should 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.