

10 Queen Square  
Bristol  
BS1 4NT

T: 0117 989 7000  
F: 0117 925 1016

[www.turleyassociates.co.uk](http://www.turleyassociates.co.uk)

2 May 2013

**Delivered by Email**

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

Our ref: PERA2019  
Your ref:  
E: [gbarnton@turleyassociates.co.uk](mailto:gbarnton@turleyassociates.co.uk)

Dear Sirs

**SOUTH GLOUCESTERSHIRE CORE STRATEGY – INSPECTOR'S FURTHER MAIN MODIFICATIONS AND SUSTAINABILITY APPRAISAL REPORT**

This statement is made on behalf of our clients, Persimmon Homes (Severn Valley) and Maximus Developments, in response to the invitation to submit representations to the Inspector's Further Main Modifications and Sustainability Appraisal Report. It follows our previous representations made at earlier stages of the Core Strategy process, together with our appearance at the Examination in Public and further hearing session. As you will be aware, our clients have promoted land in their control to the east of Chipping Sodbury throughout this process.

**Inspector's Further Main Modifications**

In light of our previous representations and appearance at the additional hearing session, we are disappointed that the Inspector has failed to propose more significant changes to the Core Strategy in the Further Main Modifications. As a result, the Core Strategy continues to set out a housing target that has not been objectively assessed and therefore fails to provide for the required number of dwellings over the plan period (of at least 33,000 dwellings). We maintain our position that insufficient evidence has been provided by the Council to demonstrate that the full objectively assessed housing needs will be met. This issue has been addressed in detail through our previous submissions to the Core Strategy process.

This position is exacerbated by the failure to provide for a binding requirement on the Council to undertake a comprehensive review of the plan by 2016/17. The Main Modifications allow for a review of the Core Strategy/Local Plan, but only require this to be completed before 2021. Given the inadequacies of the plan in terms of the overall housing requirement, and the failure to provide for the delivery of a five year housing land supply, this provision should be set earlier in the plan period. The significant lead in time for major developments to proceed, and the requirement for a comprehensive green belt review, also mean that this process should be started earlier than 2021 to be effective. We also object to the proposed deletion of the requirement to review the appropriate level of new homes before the end of the plan period from Policy CS15. This requirement should be reinstated, but with

reference to *“the appropriate level of new homes to be reviewed prior to 2016”*, rather than prior to 2021 as previously proposed.

Aside from concerns regarding the overall housing requirement, the main modifications also fail to address the delivery of a five year housing land supply. The Inspector recognises that *“revisions to policy CS15 are necessary to ensure the Council can deliver a 5 year housing land supply”*. In response, the Inspector has proposed one additional housing site at Morton Way North, Thornbury and increased the reliance on potential housing sites (including infill development) and delivery from the New Neighbourhood at Yate. These revisions, however, do not go far enough to ensure a five year supply of sites to 2016/17.

Main Modification MM26 establishes that the identification of land at Morton Way North is required *“to enable the Council to provide sufficient housing land in order to meet its 5 year housing land target and an additional 20% buffer of housing land”*. Whilst not objecting in principle to the identification of land at Morton Way, this site on its own will not be sufficient to ensure that the Council is able to deliver a five year supply of sites. There remains a clear need to identify additional sites over and above land at Morton Way North.

Our representations to the further hearing session (dated 8 February 2013), and the joint statement submitted by the housebuilder/developer consortia, established that there is a need to identify a number of additional sites to meet the residual shortfall in five year supply (of at least 909 dwellings). A series of suitable and deliverable sites were identified through the joint statement, including our clients site to the east of Chipping Sodbury. This statement also emphasised that to meet the identified shortfall there is a need to allocate sites capable of delivering a higher number of units than the shortfall itself. This will allow for non-implementation and the lead in times needed to bring these sites forward.

As stated above, the Further Main Modifications also allow for increased delivery over the five year period (to 2017) from potential housing sites and the New Neighbourhood at Yate. As set out in our previous representations, we believe that the reliance placed on a number of sites relied upon in the five year supply is over optimistic. This was also confirmed through evidence provided to the Inspector by the development industry at the further hearing session. This position reinforces the need for an early review of the plan.

The above position is strengthened by the recent appeal decision at Engine Common (Ref: APP/P0119/A/12/2186546), which despite being dismissed on site specific grounds demonstrated that the Council is unable to deliver a five year supply of land. The performance of the Council in determining major applications, even those supported through the emerging Core Strategy (such as the New Neighbourhoods) support the previous calls for additional sites to be identified. Our clients continue to experience severe delays in the determination of their existing application at Fishpool Hill despite the site forming part of the Cribbs Causeway New Neighbourhood. The lead in times and continued delays in determination demonstrate that the Council is unable to meet the delivery of a five year supply.

Our clients site at Chipping Sodbury continues to represent a sustainable and logical development that is in accordance with the overarching settlement hierarchy set out in the Core Strategy (Policy CS5). Without repeating the arguments previously made, the site is available now and is capable of making a valuable contribution to the five year supply of sites.

We also object to Main Modification MM27, which proposes that “*or a replacement Local Plan*” is added to Policy CS34. This modification would result in defined settlement boundaries that are not reviewed through the Sites and Places DPD remaining unchanged until any review of the Local Plan. As currently proposed, this is unlikely to take place until 2021. This period of time is too long and is unreasonable compared with the provisions of the original draft Core Strategy, which proposed review within five years. As such, the Core Strategy should require all boundaries to be reviewed through the DPD process and the modification adding “*or a replacement Local Plan*” be deleted. This amendment should also be repeated in Policy CS5 (b), which states that “*defined settlement boundaries will be maintained around rural settlements and reviewed in the Policies, Sites and Places DPD or a replacement Local Plan*”.

### **Sustainability Appraisal Report (March 2013)**

The Sustainability Appraisal Report concludes that land at Morton Way North is “*the next most sustainable site when assessed against the other reasonable alternatives*”. The Council’s appraisal is set out in Appendix 2 of the Sustainability Appraisal Report and compares Morton Way North to twelve other alternative sites. The appraisal is, however, arbitrary and highly subjective. The process as a whole appears to be predicated on the assessment of a pre-identified site.

Whilst we do not object in principle to the allocation of land at Morton Way, Thornbury, we would reiterate that the identification of a single site is insufficient. As stated above, a number of sites should be identified through the Core Strategy process. Such sites should be consistent with the overall settlement hierarchy set out in Policy CS5, which would logically include additional growth at Yate and Chipping Sodbury.

Taking our clients site at Chipping Sodbury, we would also question the conclusions drawn by the Council in their appraisal and the conclusions drawn in the summary of sustainability reasons for dismissal of the site. There is no clear logic as to why land to the east of Chipping Sodbury has scored more negatively than land at Morton Way North in the SA Objectives. We have not set out a detailed critique of every SA Objective, but two specific examples are given below.

This inconsistency is evident in the Council’s scoring of SA Objective 2 as a negative effect for Chipping Sodbury and a positive effect for Morton Way North. The comments relating to Chipping Sodbury suggest that this negative score is because the “*severance caused by the site’s location means that it will not integrate well with Chipping Sodbury*”. We do not believe that this statement is correct, but regardless of this, cannot see how any issue of severance is worse than at Morton Way North. Again, we would question why our clients site has been scored as negative in relation to SA Objective 3, whilst land at Morton Way North has been scored as both a positive and negative effect.

The Council's appraisal recognises that the development of land at Morton Way North would result in a positive effect on the town's local economy. The development of a mixed use urban extension to the east of Chipping Sodbury would clearly have a similarly positive effect on its local economy. The scale and composition of the proposed scheme at Chipping Sodbury would also deliver wider benefits to Chipping Sodbury in terms of developing the economy in ways that meet people's needs.

The strong sustainability credentials of our clients site have been set out in previous submissions to the Core Strategy process – demonstrating that the site is a suitable, logical and sustainable location for development and entirely in accordance with Policy CS5. As stated above, we would question a number of the Council's assumptions made about the site, and subsequently how this has been translated into the appraisal matrix. Overall, we would argue that our clients site should score significantly higher in the appraisal of alternative sites/locations and has not been objectively assessed and scored by the Council.

### **Revocation of the 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. The Draft South West RSS 2006-2026 (and the evidence which lies behind it) also remains a significant material consideration in the determination of planning applications (particularly in those areas where up to date plans are not in place). The Government's intention to revoke Regional Strategies, however, 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).

Just because a Regional Strategy has (or will be) revoked, however, does not necessarily mean that the evidence base which underpinned its policies is no longer applicable. This 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.

### **ONS 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. In contrast the RSS evidence base and policies do indeed provide for a longer time horizon until 2026. 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 the requirement 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 trust that the above comments will be given due consideration through the Core Strategy process.

Yours sincerely

**Turley Associates**