

Inspector P. Crysell
c/o Programme Officer
Core Strategy Hearing
South Gloucestershire
Council

24th July 2013

Dear Inspector Crysell

Comments from CPRE South Gloucestershire on the Council's letter of 7th June 2013 and associated documents

The argument put forward by South Gloucestershire Council based on the BNP Paribas report and the update to Appendix A and B of the AMR that there is a 5 year deliverable housing supply concurs with our view that there is no need to allocate any further sites in the Core Strategy. We have already stated our opinion in our comments on the Inspector's Main Modifications that demand for housing in the short to medium term is in any case likely to be less than that projected, a view reinforced by the revised ONS Household Interim projections for 2011-2021.

Views on the level of deliverability of sites are to a certain extent subjective, but we contend that in the present economic and financial climate it is more damaging at many levels to overestimate the number of sites required in the short term.

We also agree with the Council's view that there is a need to proceed as rapidly as possible towards adoption of the Core Strategy because of the current scope for piecemeal development and planning by appeal rather than by a locally determined plan led system. We are particularly concerned about developments in the Green Belt, not least because the Core Strategy itself proposes to release land from the Green Belt to accommodate what we consider are excessive target numbers for housing.

In a Written Ministerial Statement on 1 July 2013 the Local Government Minister Brandon Lewis indicated that CPRE's concerns are shared by the Government and reaffirmed Green Belt policies in relation to land supply assessments:

*"As set out in [the *Planning Policy for Traveller Sites*] and in March 2012's National Planning Policy Framework, inappropriate development in the green belt should not be approved except in very special circumstances. Having considered recent planning decisions by councils and the planning inspectorate, it has become apparent that, in some cases, the green belt is not always being given the sufficient protection that was the explicit policy intent of Ministers.*

The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether



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for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the green belt.’ [Our emphasis]

In conclusion we strongly contend that the current Core Strategy and proposed modifications are promulgated on an exaggerated projected demand for housing and were it not for the urgency to bring to an end planning by appeal, would be worthy of revision on these grounds. Meanwhile there is a clear intention by South Gloucestershire Council to provide a sufficient level of development sites to meet Core Strategy targets in accordance with land supply requirements, based on the independent assessments which they provide.

Yours sincerely

Jill R. Kempshall

CPRE South Gloucestershire District Committee

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