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23 July 2013

For the attention of Kath Thorne

Dear Programme Officer

South Gloucestershire Core Strategy Additional Information

Thank you for providing the Highways Agency (Agency) with the opportunity to provide comments on the additional information in support of the delivery of housing sites. We have reviewed the documentation provided and provide for you below our comments.

Letter from SGC re Five Year Housing Land Supply

The Agency acknowledges the need for the Core Strategy to include a five year housing supply in accordance with the NPPF to ensure that the document is 'sound'. By 'sound', we mean positively prepared, justified, effective, and consistent with national policy. We support the Council's intent to resolve this issue as quickly as possible while reducing the risk of legal challenges and, therefore, further delays. Having a sound plan against which to determine proposals will also reduce the number of premature applications that may come from developers before the Plan is adopted.

While the Agency does not wish to comment on the mechanics of calculating the housing numbers, we agree that substantial weight can be afforded to the confirmation of the strategic housing requirement given the advanced stage the Core Strategy has reached.

The Agency welcomes the Council's commission of an independent expert, BNP Paribas, to assess the deliverability of the proposed housing numbers.

BNP Paribas Assessment of delivery of housing sites

The Agency acknowledges that windfall sites form part of the delivery of housing numbers, although we note that the CS does not depend on windfalls to achieve its five-year land supply. By their nature it is difficult to estimate the amount and size of windfall sites that will come forward.

Although there is a number included in the calculations for windfalls, any applications on sites of this type will need to be accompanied by a robust transport evidence base produced in accordance with the adopted Policy framework of the time to ensure that the safety and free flow of the Strategic Road Network is not prejudiced. The supporting transportation evidence base may need to include the production of a Transport Assessment and Travel Plan, identifying measures to reduce overall traffic impact as well as measures to mitigate any residual impact.

A robust transport evidence base will also be required for sites which come forward as a result of applications for change of use. The Agency encourages the use of previously developed land and brownfield sites although it is important that impacts from such sites are assessed through appropriate transportation submissions including Transport Assessments and Travel Plans.

We note also the comment in paragraph 8.4 which states that there is more than adequate capacity in the larger sites to accommodate any demand over and above what has been estimated should the market return to boom conditions. Although there may be the ability to facilitate the increases in housing numbers, in conjunction there may be a need to provide additional transport evidence base and where appropriate modelling work to confirm that the Strategic Road Network would not be prejudiced by the intensification of development on existing identified sites. Again, the transport evidence base will need to be provided in line with the prevailing Policy framework at the time of application.

Annual Monitoring Report December 2012 – April 2013 Update Appendix A and Appendix B.

The AMR update April 2013 is an update to the existing AMR of December 2012 to include the latest information to 1st April 2013. The Agency acknowledges that this document is ordinarily published in December but that this update is important to ensure that, as far as possible, the NPPF requirement for adequate, up to date and relevant evidence is followed. The update also lends weight to the work done to demonstrate that the five-year housing supply exists and as such the Agency makes no further comments.

Yours sincerely

A black rectangular redaction box covering the signature of Mrs Jacqui Ashman.

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cc: Michelle Berrington - JMP