

South Gloucestershire **Local Plan**  
**Policies, Sites and Places**  
**Development Plan Document**

# **Regulation 18 Consultation:** **Including Additional Housing Allocations**

November 2015

[www.southglos.gov.uk](http://www.southglos.gov.uk)



## How to make representations

Representations are invited on this consultation document for the period from **20<sup>th</sup> November 2015 until close of business on 8<sup>th</sup> January 2016**.

Questions have been set out throughout this document to aid your response.

### **Question 1: If commenting on a particular site, location, rural village or settlement please state which.**

The Council's preference is that representations be made online, using the Council's internet based consultation system: [www.southglos.gov.uk/PSPconsultation](http://www.southglos.gov.uk/PSPconsultation)

If this is not possible, responses should be sent, using the response form provided (available to download at the webpage above), to the following:

- By e-mail: [PlanningLDF@southglos.gov.uk](mailto:PlanningLDF@southglos.gov.uk)
- By post: Strategic Planning Policy and Specialist Advice Team, South Gloucestershire Council, Environment and Community Services Department, PO Box 299, Civic Centre, High Street, Kingswood, Bristol, BS15 0DR.

All representations made during the summer 2015 consultation on the Proposed Submission version of the PSP Plan (dated March 2015) will also be made available on the council website. All of the comments received during that consultation will still be taken into consideration. The Council will write to all respondents asking for confirmation that they still wish their comments to be considered by the Inspector, therefore avoiding the need to re-submit the representations again.

### **Next steps**

The Council will consider all responses and suggested allocations to this consultation paper and bring forward a revised Proposed Submission Policies, Sites and Places Plan for formal public consultation (in line with Regulations 19, 20 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012) in the summer 2016.

Progress updates and further information on the PSP Plan (including Local Green Space) can be found on the Council's website at [www.southglos.gov.uk/policiesitesandplaces](http://www.southglos.gov.uk/policiesitesandplaces).

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## Executive Summary

- The role of the planning system in respect of housing provision, is to significantly boost supply through sustainable developments.
- To be adopted a Local Plan should address the housing needs of an area and identify sufficient deliverable sites to provide five years' worth of housing, plus a 20% buffer. To provide a realistic prospect of achieving the planned supply and ensure choice and competition in the market for land.
- In South Gloucestershire housing supply levels, for the next 5 years, have fallen below those set in the council's adopted Core Strategy.
- Housing delivery rates are largely beyond the direct control of the council. The resulting slippage against targeted delivery has also been outside of the control and influence of the council.
- There is a need to restructure the housing trajectory<sup>1</sup>, by bringing forward identified development sites, in order to boost immediate housing supply. There is also a need to identify additional non-strategic, small and medium sized, residential allocations.
- At the commencement of the PSP Plan process there was no requirement to identify additional sites for housing to meet the housing requirement of the area. The PSP Plan's initial approach was therefore to support communities to bring forward new housing sites in the rural areas, rather than propose sites at the outset. However, this only led to one community identifying a site for 20 new homes. Due to the housing land supply shortfall over the next 5 years the approach in the PSP Plan must be reviewed to address this.
- The PSP Plan cannot be progressed as intended while the shortfall remains. Therefore this paper sets out the process by which the council will aim to make the shortfall good.
- The housing shortfall exists in the next 5 year period, therefore additional allocations will only be made for those sites that the council considers can make a meaningful contribution to housing supply in the next 5 years.
- This paper sets out the methodology proposed to consider locations and sites which are suitable and available for housing allocation.
- The objective is to make additional housing allocations that will support sustainable development, therefore this process will not result in growth at any cost. The impact of any allocations will be appropriately assessed, however it is important that the PSP Plan achieves a significant boost in the supply of housing provision in the short term.
- The council will review the potential allocations and may need to consider if exceptional circumstances exist that would fully justify sites to be released from the Green Belt.
- This paper also sets out the additional benefits in pausing the submission of the PSP Plan which now enable further work to be undertaken on the development management policies.

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<sup>1</sup> Under national policy (NPPF para 47), the council is required to illustrate the expected rate of housing delivery through a "housing trajectory" for the plan period. This is to demonstrate that the council can deliver its development plan housing targets. An annual housing trajectory is therefore produced by the council which involves monitoring both past and anticipated housing completions across a period of time. It can help indicate at an early stage whether any steps need to be taken to ensure that planned housing requirements are met.

## **Part 1: Context**

Part 1 sets out the context, the scale of the housing supply shortfall and the additional benefits arising from a period of further analysis and assessment, prior to the submission of the Policies, Sites and Places (PSP) plan.

Part 2 deals with the assessment process that will be used to consider potential housing allocation sites.

### **1. Proposed Submission Policies, Sites and Places Plan – March 2015**

1.1 The Policies, Sites and Places Plan (PSP Plan) is the final document in completing the South Gloucestershire Local Plan. The Local Plan currently comprises the Joint Waste Core Strategy (adopted 2011) and the Core Strategy (adopted 2013). The PSP plan will update and replace the previous South Gloucestershire Local Plan (adopted 2006) and Minerals & Waste Local Plan (adopted 2002) and will guide future planning decisions in the district.

1.2 The council published a proposed submission version of the PSP Plan (dated March 2015) for formal consultation between 22 May and 3 July 2015 in accordance with Regulations 19, 20 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.3 The March 2015 version of the PSP plan set out the results of the Rural Housing Review, a process where communities could support the level of growth they considered appropriate for their area. This was consistent with policies CS5 and CS34 of the Core Strategy and was conducted on the basis of the council being able at that point in time to demonstrate sufficient overall supply of housing to meet the need identified in the Core Strategy and the immediate 5 year housing land supply. The plan concluded that only one village considered additional growth was required, and therefore supported growth for an additional 20 houses.

1.4 The main issue raised as a result of the summer 2015 consultation related to the shortfall in housing numbers and absence of a five year supply. This is explained below.

### **2. Five Year Housing Land Supply Shortfall - Charfield appeal decision**

2.1 An appeal decision for residential development on a site at Charfield was granted permission in June 2015. The Inspector in allowing the appeal concluded that the council was unable to demonstrate a deliverable 5 year supply of housing. In accordance with government policy the inspector assessed the relative merits of the sustainability of Charfield and concluded that it was appropriate to grant planning permission. The council had at that time already begun consultation on the proposed submission version of the Policies, Sites and Places Plan, which took account of the community view that Charfield should not take additional growth.

2.2 Subsequently representations were made on the PSP Plan raising the five year supply as a material issue. The council has carefully considered the outcome of the appeal, the representations made and have prepared an updated analysis of the supply as detailed

below. This concluded that additional housing allocations in the PSP Plan are necessary if the council is to safeguard its commitment to plan-led development.

2.3 An allocations plan, such as the PSP Plan should be consistent with national policy, which states that the council should be able to demonstrate a 5 year supply of deliverable housing land. Submitting a plan without being able to demonstrate 5 year housing land supply would mean that there is some risk to it being found unsound and therefore not capable of adoption. This would cause a delay in addressing the shortfall and also bringing forward updated development management policies.

### **3. Scale of the shortfall and Core Strategy delivery**

3.1 The Charfield decision focused on assessing the deliverability of a limited number of sites. The council has subsequently, as part of the annual monitoring reviewed all sites which formed part of its housing trajectory. This monitoring has demonstrated that while delivery is accelerating on some sites, on others it has fallen behind projections. There are numerous variables for this, such as the slow recovery of the housing market following the recession, delays introduced through protracted land acquisition processes and unresolved/unforeseen abnormal infrastructure/works that have impacted to varying degrees on the delivery of Core Strategy sites. What they have in common however, is that these circumstances are all largely outside of the council's control. In fact we can demonstrate that there are 10,500 dwellings with outline, full, or reserved matters planning permission. However, the cumulative impact of delays across a number of sites mean that the scale of the shortfall cannot be overcome by introducing a few additional sites, or by relying on windfall development, in an Examination in Public (EiP) process.

3.2 The council has published an early release of the monitoring report in relation to housing requirement and supply (an extract can be found in Appendix 1). This identifies a supply of 8,659 homes projected to be delivered over the next five years, against a requirement of 10,110. Taking account of the undersupply in previous years and a profiling of supply from identified sites a shortfall of **1,451** is now identified. This shortfall covers the 5 year period from 1 April 2015 to 31 March 2020. Supply and requirement will change over time as more housing is built, it is important that additional allocations meets the shortfall at the time of adoption of the plan.

3.3 The monitoring of the future housing supply is detailed in the "Housing Trajectory" (Appendix A of the Authority's Monitoring Report). The assessment reveals that the compounding effect of the development industry's under delivery against the annual Core Strategy requirement, has created a situation whereby the annual requirement is in excess of any previous years' completion rate since 1989. This is despite some 10,500 homes being available with planning permission.

3.4 The council's assessment, supported by independent appraisal, is that the ability of the development sector to construct and complete sufficient new homes to address this shortfall within the next 5 years (referred to as the Sedgefield approach), in the context of ambitious annual housing targets set out in the adopted Core Strategy, is not feasible or practical. The council recognises the desire, set out in the National Planning Practice Guidance, to address under delivery as soon as possible. However, the particular circumstances that exist in South Gloucestershire mean that it would be wholly inappropriate to calculate the housing supply requirement in this way as this would inflate the annual requirement to in excess of 2,100 units and result in a housing target that cannot be achieved. In short the council does not consider that it is possible to deliver this amount of housing over this period. Indeed, the development industry has never delivered in any single

year more the 2,055 units since 1989 when records began (South Gloucestershire Council: Residential Land Survey, April 2015). Therefore, in a change from last year's AMR, the housing trajectory is set on the basis of addressing under delivery over the remaining plan period to 2027 (referred to as the 'Liverpool approach') as this provides a more realistic target.

**Question 2: It is considered that the development industry's ability to deliver an annual supply of 2,100 homes per year is not feasible or practical, therefore do you support the council's approach to calculating the 5 year housing requirement?**

#### **4. Demonstrating leadership to address the shortfall**

4.1 The government attaches great importance to maintaining a five year Housing Land Supply (HLS), as set out in the National Planning Policy Framework (NPPF). The consequence of not being able to demonstrate a five year supply is that national policy directs that the housing supply policies in adopted and emerging policies are to be regarded for development control purposes as if they are out of date. The Government have also made it clear that all planning authorities are to have up to date local plans in place by 2017 or risk the Government stepping in and undertaking this. The council wishes to avoid either planning by appeal<sup>2</sup> or Government taking over its responsibility to prepare local plans. Therefore, it very much supports following a plan led approach to make additional allocations in the Policies, Sites and Places Plan. Thus through site identification, assessment and consultation with the community, the council is identifying sites where development could be located through the PSP Plan. This provides the greatest opportunity for communities to be involved with the allocations that will affect them.

4.2 The council wishes to be clear to all parties, it does not support growth at any cost. In other words, we are not seeking to expand to the detriment of for example, good place making, adverse impact on areas of high landscape value or to develop areas that are prone to flooding, or would cause significant environmental impact. The objective will be to make allocations that represent sustainable development, i.e. which balances the economic, social and environmental objectives of the NPPF.

4.3 A sequential approach to making the additional allocations is proposed (see Part 2), this will be undertaken in line with the spatial strategy set out in the adopted Core Strategy. Initially additional growth in the most sustainable locations will be considered, then if insufficient housing cannot be found to address the shortfall, the next most sustainable location will be considered, and so on. However, it is possible given the size of the shortfall that additional supply in the most sustainable locations of the urban areas of the North and East Fringes of Bristol, Yate/Chipping Sodbury and Thornbury will not be able to fully address the shortfall. Therefore additional allocations are likely to be needed to be made in the villages and settlements located in the rural areas. The council monitors its housing supply and other land uses on a regular basis, publishing the results annually. This monitoring process already takes into account a number of future residential sites from the existing urban areas and therefore additional sites from these areas are likely to be limited.

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<sup>2</sup> Planning by appeal is the situation where a planning application is refused by the local authority but the applicant takes the council to a planning appeal and a government appointed Inspector reverses the council's decision and gives the application permission based on the detailed scrutiny of the reasons for refusal which may include the fact that the local authority cannot demonstrate a 5 year supply of housing land

4.4 The circumstances which are driving the need for additional housing locations to be identified through the PSP plan are unfortunate especially as these largely sit with the development sector. However, the council is fortunate that it has immediately available to it the choice of using the PSP plan as a vehicle for helping ensure allocations remain plan-led. This will provide appropriate opportunity for community and stakeholder engagement, support and challenge.

4.5 The circumstances also do allow the council and local communities to revisit in a more comprehensive manner, the opportunity to introduce a broader mix and balance of housing sites, both in terms of size and location within the District. While the impacts of new development do need to be carefully assessed, and where possible mitigated, the benefits from helping to support communities to sustain and perpetuate themselves and strength community fabric through growing the housing stock also need to be recognised. The opportunity for all locations to consider the potential for some local housing growth over the next five or more years, to support and sustain communities and the facilities they need, should be taken into consideration, alongside careful assessment of impact.

4.6 Part 2 of this paper details how the council will seek to address the housing shortfall, assess locations and sites, in relation to their suitability for potential development in the next plan period. The additional allocations need to contribute to housing delivery within 5 years i.e. help to address the council's shorter term housing supply challenges. Through this consultation the council is not reopening the debate about the overall housing requirement for the District. This is established by the council's Core Strategy and will be in place until replaced by the Joint Spatial Plan and the Council's New Local Plan, (see section 5 below).

4.7 Notwithstanding this, the council does see a benefit in seeking to diversify the portfolio of allocated housing sites within the housing trajectory. This is to ensure the housing market has a range of opportunities for boosting supply of housing in line with government policy. For example by bringing forward small and medium sized sites it is hoped that more house builders have the opportunity to operate in South Gloucestershire.

4.8 The council will look to use submitted site information to address the shortfall via the PSP Plan where sites can be delivered over the next 5 years and to feed into the JSP/Local Plan Review where a site cannot be delivered in the next 5 years. At this stage the council wishes to receive and consider sites across all existing urban areas, market towns and settlements.

**We are keen to understand what growth can be delivered in locations, such as Yate, Chipping Sodbury and Thornbury where allocations are already in place and are being constructed.**

**Question 3: Can the market support additional site allocations in these towns?**

**Question 4: Will additional allocations impact on the planned construction rates of existing allocated sites in these towns?**

## **5. Relationship with Joint Spatial Plan (JSP)**

5.1 In March 2014 the West of England authorities formally agreed to work together on a Joint Spatial Plan (JSP). Its objective is to identify the overall quantum of housing (the housing requirement) and jobs and their distribution across the sub-region, the overall spatial strategy, priorities, and infrastructure necessary to deliver a spatial strategy. The JSP will

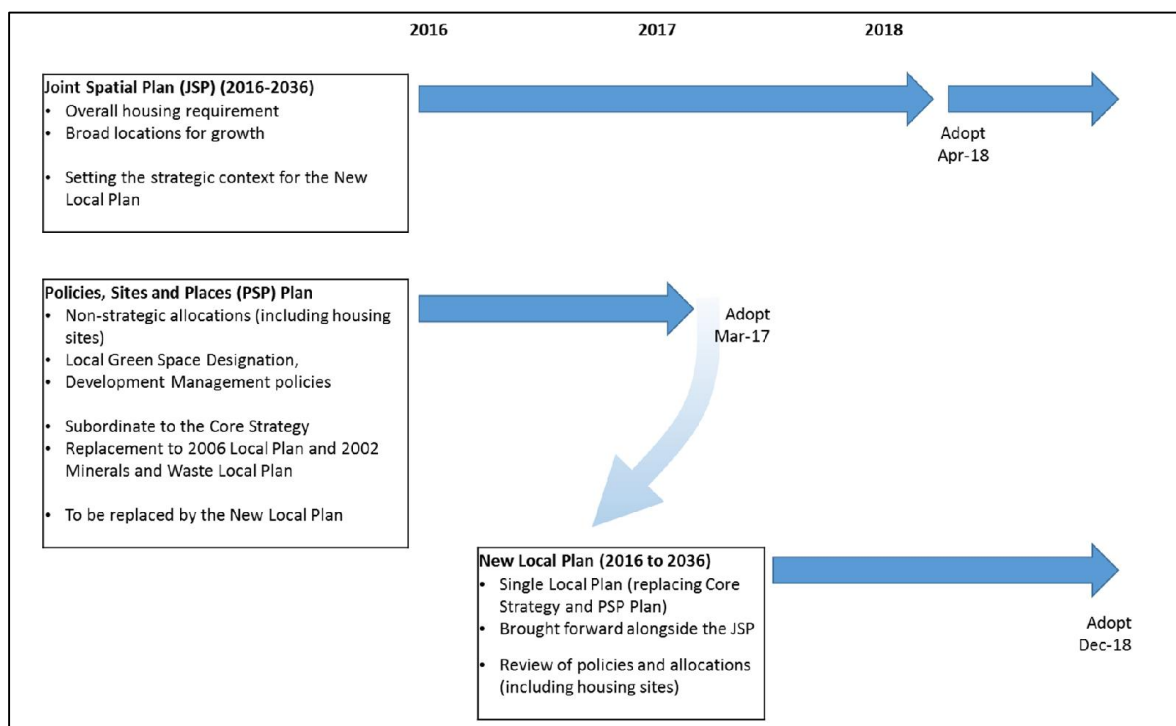


cover the period from 2016 to 2036. It will be the basis by which South Gloucestershire will identify and agree its new overall housing requirement for the period 2016 to 2036, thereby replacing strategic elements of the Council's adopted Core Strategy.

5.2 As it looks to 2036 the JSP will seek to address the housing needs over and above existing Core Strategy allocations by identifying new locations for strategic growth from 2027-2036.

5.3 Further site specific allocations and policy designations beyond those required in the PSP Plan will be determined through the new Local Plan Review which will need to be in conformity with the JSP.

5.4 Allocations in the PSP Plan will need to come forward supporting additional housing delivery in the next 5 years. In effect there will be an acceleration of sites which would otherwise have been brought forward via the new Local Plan, which will follow the JSP. As a result planning for additional growth in the next 5 years through the PSP Plan should reduce the need to find as many sites via the JSP process and New Local Plan, in the period 2027-2036. Timelines for the JSP, PSP Plan and New Local Plan are set out below:



## 6. Local Green Space Designation

6.1 Local Green Space is a designation that effectively provides Green Belt status to spaces that are of particular importance and local significance to communities. In line with national policy, spaces can only be designated where they are consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.

6.2 In March 2015, the council decided to separately consult on this element of the PSP Plan, in an informal manner, with the intention of formally consulting on the final list around the same time the other elements of the plan were to be submitted. Informal consultation in relation to the designation of Local Green Spaces in accordance with Regulation 18 of the

Town and Country Planning (Local Planning) (England) Regulations 2012 took place in summer 2015, landowners/leaseholders were contacted during this time.

6.3 Due to the change in circumstance in respect of the housing land supply, work on identifying additional housing allocations and on designating local green spaces need to be considered together, as perhaps unsurprisingly a number of Local Green Space sites have also been proposed as housing sites. Government policy requires the council to be sure that any Local Green Space designation should be in conformity with the need to allocate sufficient housing land to address the shortfall in the 5 year housing land supply.

6.4 Following the informal consultation that took place over summer 2015, newly identified landowners affected by nominated spaces are being contacted.

## **7. Duty to Cooperate (DtC)**

7.1 The DtC requires local planning authorities to engage with relevant local authorities and prescribed bodies actively, constructively and on an ongoing basis on strategic planning matters which have an effect on two or more Local Planning Authorities. Provision of housing is a strategic matter, we are therefore engaging with all relevant local authorities and prescribed bodies during this consultation. The council has already engaged with neighbouring local planning authorities in advance of the start of this consultation, because it considers the shortfall within its five year supply is potentially a challenging strategic issue. If it is not possible to allocate sufficient sustainable sites, without adverse impacts within South Gloucestershire, in accordance with Government policy it will then be necessary to seek assistance from neighbouring authorities in addressing the shortfall. The council wishes to continue to engage with relevant authorities throughout this process in respect of this matter.

### **Question 5: What comment do you have on the council's approach to ensuring it conforms with the Duty to Co-operate (DTC)?**

## **8. Timetable**

8.1 The full timetable for the production, submission, examination and adoption of the PSP Plan can be found here: [www.southglos.gov.uk/policies/sitesandplaces](http://www.southglos.gov.uk/policies/sitesandplaces)

8.2 In summary the critical next steps are:

1. Complete this consultation, 8<sup>th</sup> January 2016
2. Completion of a site's suitability, achievability and availability assessment, March 2016
3. Council decision on proposed allocations, April 2016
4. Formal consultation on proposed allocations, May-July 2016
5. Submission of the Plan, following close of formal consultation.

8.3 We would encourage all interested parties to comment during the two consultation periods identified.

## **9. Additional benefits in pausing the submission of the Plan**

9.1 Further to the direct benefits of addressing the shortfall, it creates an opportunity for the council to:

- Make all representations to the March 2015 proposed submission plan available to view online;

- Where appropriate, make changes to the proposed submission plan policies to address representations submitted during the summer 2015 consultation process; where to do so would ensure a sound plan and help to resolve objections made, and
- Update policies in accordance with recent government policy announcements, for example we will be bringing forward further amendments to the proposed internal space standards policy (PSP38).

## **10. Revised Policy: PSP38 Internal space and accessibility standards for new dwellings**

10.1 Following publication of the Governments Housing Standards Review the Council is consulting on adoption of the Nationally Described Space Standards and enhanced accessibility standards for new dwellings to assist good design and health and well-being objectives. The revised policy and supporting evidence document can be found at [www.southglos.gov.uk/PSPconsultation](http://www.southglos.gov.uk/PSPconsultation). Please use the separate response form available from that webpage to submit comments to this revised policy.

## **11. Revised guidance: Planning policy for traveller sites (August 2015)**

11.1 An updated version of 'Planning policy for traveller sites' (PPTS) was issued by DCLG on 31 August 2015 (available to view here: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>). The main changes comprise additional guidance for local planning authorities in relation to large-scale unauthorised sites and greater protection in relation to Gypsy/Traveller proposals in the Green Belt and open countryside. To support these changes, PPTS now includes a change to the definition of Gypsies and Travellers and Travelling Showpeople (Annex 1) for the purposes of planning policy.

11.2 The definition is seeking to effectively remove those who have ceased to travel permanently as falling outside of the definition of what it means to be a Gypsy/Traveller of a 'nomadic lifestyle' or Travelling Showperson. However, additional considerations have been added to the definition of Gypsy/Traveller (para 2, Annex 1), which results in the change to the definition not being quite as straight forward as simply saying those who have ceased to travel permanently are not Gypsy/Travellers. Consideration also needs to be given to their ethnicity, for example, Romany Gypsies and Irish Travellers who largely reside in our area, all have protected characteristics as an ethnic group under the Equalities Act 2010.

11.3 In light of this new guidance, the Council needs to carry out a refresh of its existing evidence base (Gypsy Traveller Accommodation Assessment (GTAA) 2013) that underpins the policies of the adopted Core Strategy and emerging PSP Plan. The local planning authority will also need to consider how it intends to interpret, determine and implement the new definition, including the additional considerations, when conducting its refresh of the GTAA.

11.4 Given the pause to the PSP Plan, there is now time for the Council to refresh its GTAA 2013 prior to submission and as a result, ensure that the policy approach proposed in the PSP Plan (Policies 45, 46 and 47) continues to be compliant with national policy.

## **Part 2: Approach to selecting sites for additional housing through the PSP Plan**

This part sets out how the 'pool' of potential sites currently available to the council will be assessed for additional housing allocations, the size site threshold which will be considered, the implications of Green Belt policy due to its importance in assessing the suitability of locations, and the process of selecting sites.

### **12. Pool of Sites**

12.1 In undertaking the process of allocating additional residential sites the council will use the 'pool' of sites put forward through the PSP Plan 'Call for Sites' process ([www.southglos.gov.uk/PSPconsultation](http://www.southglos.gov.uk/PSPconsultation)). The 'Call for Sites' was an opportunity for landowners to put forward their site for potential development. The council will only look to assess and allocate those sites that have been put forward by landowners or developers through the Call for Sites process, together with sites that come forward as part of this consultation, and which are capable of being delivered in the next 5 years. The council considers sites of 150 dwellings as being near the upper limit of deliverability within a 5 year timescale.

12.2 Sites which are not capable of being delivered within the next 5 years, but submitted to the council will be considered through the JSP and Local Plan Review processes. These plans will look to allocate housing, including the more strategic and larger sites over 150 dwellings, in the period up to 2036.

12.3 Sites which have not previously been submitted to the Call for Sites are welcomed, the Site Response Form should be used to submit additional sites (available from: [www.southglos.gov.uk/PSPconsultation](http://www.southglos.gov.uk/PSPconsultation))

12.4 If you are a promoter of a site/s for housing please see sections 20 and 21, where additional information regarding site suitability, availability and achievability is being requested. All parties should be aware that the fact a site appears in the Call for Sites document does not imply that the council supports the site for development or that it will be allocated.

12.5 Information on the deliverability of smaller parcels of previously submitted larger sites is welcomed, please see sections 20 and 21 for more information. Please respond using the Call for Sites Response form, available from the link above.

12.6 If you only submitted a site/s through the Joint Spatial Plan process, but now also consider it could form an allocation in the PSP Plan please bring this to our attention and supply the additional information requested in the Call for Sites Response Form relating to suitability, availability and achievability; otherwise it may not be possible to consider your site.

### **13. Site size threshold**

13.1 The sites identified through the previous PSP Plan Call for Sites processes and submitted in response to this consultation will be considered, and assessed for their potential to contribute to delivery of additional housing within 5 years.

13.2 It is critical that sites can be delivered within 5 years to contribute to the short-term housing need. Sites which are strategic in nature or size are being considered through the JSP and Local Plan Review. Such sites are very unlikely to be deliverable within 5 years due

to long lead in times, for example the greater level of site preparation and infrastructure required to support development.

13.3 The council considers that delivery within 5 years in the first instance needs to take account of the following issues;

1. Site acquisition,
2. Site preparation,
3. Planning process, and
4. Realistic build rates.

13.4 Based on historic delivery rates, it is considered realistic to allow at least 2.75 years in total for site acquisition, site preparation, the planning process and the construction process.

13.5 Sales and build rates will vary between sites but there is increasing evidence that [feasibility] decisions are being made on the basis that individual sales outlets on sites achieve circa 77 private and affordable housing units per annum (based upon 35% affordable) (BNP Paribas Real Estate – Assessment of Delivery of Housing Sites as at November 2015, 19 November 2015). This equates to a general industry rule of thumb of one dwelling completion per week in single outlet sites (for market housing). The BNP Paribas Real Estate (Assessment of Delivery of Housing Sites as at November 2015, 19 November 2015), states at para 4.11:

*...Within the remaining 2.25 years of the 5 year period this would suggest the equivalent of a maximum of circa 175 units for an outlet or small site. This is based on schemes delivering in the main urban area and market towns. Therefore a lower average maximum would be reasonable should schemes from across South Gloucestershire, including the rural areas be considered. This is because the annual rate of completions on sites within the rural areas is likely to be lower.*

13.6 The upper threshold is thus set at 150 dwellings to allow time for site acquisition, site preparation, the planning process and construction stages.

13.7 For a site to be subject to assessment for allocation in the PSP, sites should generally be within the range of 10 to 150 dwellings. As set out in section 19, growth must be proportional to the settlement and therefore the upper limit of the range may not be appropriate and a lower growth level would be.

13.8 The council may consider sites slightly above this threshold, subject to meeting the requirements of the site assessments set out in Step 2 to 4 of this paper. However, any site proposed above 150 dwellings must demonstrate how it will operate as a self-contained, sustainable development. This is particularly important when a site forms a smaller parcel of a larger site. The council will not allocate additional housing in the PSP that is reliant on infrastructure and development from later phases of a larger development to function effectively.

**Question 6: To ensure delivery within a 5 year timescale, do you agree with the 150 dwelling limit and the basis for how the Council has arrived at this?**

## 14. Implication for the Green Belt

14.1 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (NPPF para 79). However, once established Green Belt boundaries can be reviewed and altered in exceptional circumstances through the preparation of a Local Plan (NPPF para 83), such as the Core Strategy or the PSP Plan.

14.2 In seeking to make further allocations the site selection process, set out in the steps below, needs to conform with the presumption in favour of sustainable development (NPPF 14) and take into account all the policies in the Framework including Green Belt policy. The proposed methodology (in line with the sequential approach to allocations) is first to consider potential locations within the urban areas, then in non-Green Belt locations adjoining the market towns and then non Green Belt locations adjoining sustainable rural villages and settlements.

14.3 However, it may not be possible to meet the housing land shortfall only from sites in non-Green Belt locations that are sustainable and which do not cause demonstrable harm which outweighs the benefits of development (NPPF Para 14).

14.4 The lack of 5 year land supply and demonstrable harm to non-green belt locations could therefore potentially provide the exceptional circumstances to justify further Green Belt review. Green Belt locations for non-strategic housing sites on the edge of the Bristol urban area, adjoining market towns and sustainable rural settlements within the Green Belt might then in turn need to be assessed.

14.5 Therefore, notwithstanding the wider strategic Green Belt review which is being undertaken as part of the forthcoming JSP, the council cannot entirely rule out potential allocation of non-strategic sites (no larger than 150 units) within the Green Belt to address the 5 year housing supply shortfall through the PSP Plan.

14.6 As the council is currently unable to demonstrate a 5 year supply of housing land, limited infilling in villages located in the Green Belt, with or without a settlement boundary, is listed as one of the 'appropriate' forms of development in paragraph 89 of the National Planning Policy Framework. However, once the shortfall in supply has been addressed full weight can be given to Core Strategy policy CS5, small scale limited infill development will only be acceptable within villages with settlement boundaries in line with Core Strategy.

## 15. Approach to selecting sites

15.1 To decide which sites might be selected for additional housing allocations in the Plan, the council is proposing a 4 step methodology to assess a potential site's location, sustainability, suitability and deliverability:

- Step 1.** Assessment of the proposed site against sequential approach to sustainable locational strategy - Including an assessment of sustainable access to key services and facilities in rural areas **(Set out in Sections 16 to 18)**
- Step 2.** Assessment of the impact on the character of the existing settlement **(Set out in Section 19)**
- Step 3.** Assessment of the suitability of the proposed site having regard to environmental and policy constraints **(Set out in Section 20)**; and
- Step 4.** Assessment of the availability and achievability of the proposed site and its potential to make a contribution to boosting housing supply in the next five years **(Set out in Section 21)**

15.2 The results of all four of these assessments will be need to be considered together to inform the final conclusion about which sites are suitable, available and achievable and therefore proposed for allocation. Steps 2-4 will be repeated through the sequentially preferable locations in turn, until the shortfall is addressed or suitable sites are exhausted. Whilst a linear step by step process has been set out in order to simply explain the process, in reality the steps will be run concurrently and in the most logical way as relevant to the location and site being considered.

## **16. Step 1 - Sequential approach to sustainable locations for development in the PSP Plan**

16.1 A sustainable locational strategy involves a sequential approach to selecting sites for housing allocations which have the best sustainable access to key services and facilities including employment opportunities. Sustainable access means the ability of those living within a community to walk and cycle, or utilise public transport, to access key services and facilities. In practice this means looking first at sites within the existing built up areas in the North and East Fringes of Bristol (including brownfield land), then the market towns of Yate & Chipping Sodbury and Thornbury and finally sustainable villages and settlements within the rural areas. The effect of additional housing on a village or settlement's ability to function as a sustainable, high quality place which meets local needs will need to be considered when making decisions on where and how much housing is proposed for allocation in the PSP Plan.

16.2 The adopted Core Strategy took the approach that the rural settlements in south Gloucestershire were less sustainable than the urban areas and market towns and so did not direct new housing to settlements in the rural areas. However, in the light of the change in circumstance set out in section 1, the PSP Plan is now likely to consider the potential for additional housing in rural areas. Therefore an assessment has been undertaken to determine the relative sustainable access to key services and facilities of settlements within the rural areas, which will be used to direct growth to sustainable locations.

16.3 The sequential assessment of locations and sites for further housing allocations in the PSP Plan, taking into account Green Belt policy, is as follows (please also see the flow diagram set out below):

1. Look first at sites within the existing urban area and settlement boundaries (including brownfield land) outside the Green Belt; then
2. Sites adjoining the market towns of Yate/Chipping Sodbury and Thornbury outside the Green Belt; then
3. Sites adjoining sustainable villages within the rural areas outside the Green Belt

16.4 If it is not possible to find sufficient sites to meet the 5 year land supply shortfall from the above process then consideration will need to be given to whether this constitutes grounds to consider Green Belt sites, including a Green Belt review to test how the area contributes to the national Green Belt purposes, as follows

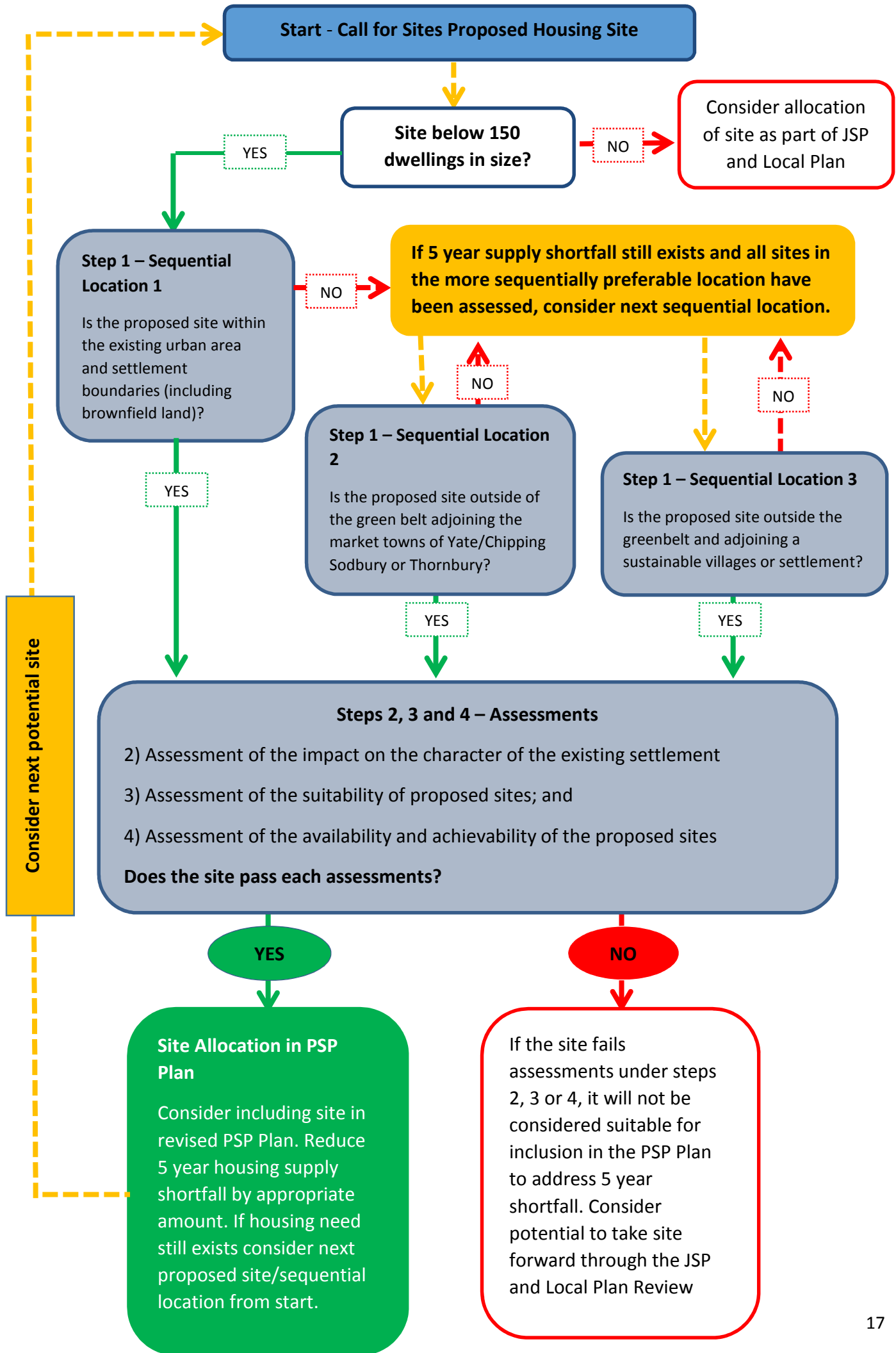
4. Sites adjoining the main urban area (North and East Fringe of Bristol urban area) in the Green Belt; then
5. Sites adjoining the market towns of Yate/Chipping Sodbury and Thornbury in the Green Belt; then
6. Sites adjoining sustainable villages within the rural areas in the Green Belt

16.5 Before considering housing allocations within the Green Belt, the following points will be taken into account;

- The size of any remaining shortfall in housing supply;
- Further options available to boost housing supply and/or accelerate delivery; such as (1) Working with Government (including the Homes and Community Agency) to overcome site delivery issues – securing funding for infrastructure and/or purchasing stalled sites. (2) The council setting up a housing company to purchase sites/develop sites with partners such as small builders or Housing Associations, (3) Establish memorandum of understandings with key developers to confirm commitment to the delivery profile for their major sites, and agreed process for managing any shortfalls; and
- The conformity of the PSP Plan process of site assessment in relation to the Joint Spatial Plan consultation and processes towards the 'preferred options' stage.

**Question 7: Do you have any comments on the soundness of this sequential approach for assessing potential housing sites?**





## 17. Step 1: Sequential Locations 3 & 6 - Assessment of sustainable access to key services and facilities in rural areas

17.1 If sites in sequentially preferable locations are insufficient to address the shortfall, allocations within the rural areas will need to be considered. We know that villages and settlements within the rural areas of South Gloucestershire do not have equal access to key services and facilities. There is also a vast range of characteristics in relation to existing population and dwelling numbers across the villages and settlements. The Rural Housing Review, referred to in the March 2015 version of the PSP Plan (Section 11), did not collect or consider evidence in relation to sustainable access to key facilities and services from villages and settlements in rural areas, relying instead on communities considering if additional growth would be helpful to in supporting their communities. However, as part of establishing potential locations for additional housing within the rural areas of South Gloucestershire, a robust understanding of sustainable access to key services and facilities, and contextual population figures and dwelling numbers, for rural villages and settlements is now required. Therefore an assessment of sustainable access to key services and facilities from rural villages and settlements has been undertaken, set out in detail within the South Gloucestershire Rural Villages and Settlements Topic Paper (2015) and associated appendices.

17.2 Please note that it may not be possible or appropriate to boost housing supply in these rural villages and settlements, due to site availability (e.g. no sites are put forward for development) and suitability (e.g. adversely affected by flooding). At this stage however, a comprehensive assessment of services and facilities has been undertaken across all locations.

17.3 The table below sets out the villages and settlements that have been subject to the assessment of sustainable access to key services and facilities. Thornbury, Yate and Chipping Sodbury have also been included in the assessment, as a measure of relative sustainable access. To assess sustainable access, to key services and facilities across the range of rural areas in South Gloucestershire, both villages with defined settlement boundaries<sup>3</sup>, as set out in draft PSP Plan PSP51 (March 2015), and settlements without a boundary have been included in the assessment. These rural villages and settlements are both within and outside of the Green Belt.

Villages and Settlements with Settlement Boundary			
Acton Turville	Easter Compton	Iron Acton	Severn Beach
Almondsbury	Elberton	Marshfield	Thornbury
Alveston	Engine Common	Old Sodbury	Tockington
Aust	Falfield	Oldbury-on-Severn	Tormarton
Bitton	Frampton Cotterell	Olveston	Tytherington
Charfield	Hallen	Pilning	Westerleigh
Coalpit Heath	Hambrook	Pucklechurch	Wick
Cromhall (Bibstone & Townwell)	Hawkesbury Upton	Rangeworthy	Wickwar
Doynton	Hinton	Redwick	Winterbourne
Dyrham	Horton	Rudgeway	Yate and Chipping Sodbury

<sup>3</sup> Settlement boundaries are drawn around existing towns and villages and define the area within which the principle of new residential and other types of development is acceptable, subject to complying with national and local planning policies.

Villages and Settlements with no Settlement Boundary			
Badminton	Hill	Old Down	Upton Cheyney
Bridgegate	Hortham Village	Rockhampton	West Littleton
Cold Ashton	Latteridge	Shortwood	
Elberton	Littleton upon Severn	Siston	

### Question 8: Do you consider any other rural villages or settlements should be subject to the sustainable access to key services and facilities assessment?

17.4 The key services and facilities, set out in the table below, were utilised for this assessment.

Theme	Key Service and Facility Assessed
<b>Food and Retail Facilities</b>	1. Defined Town Centres 2. Supermarkets 3. Individual Convenience (food) and Comparison (retail and services) Shops
<b>Health Facilities</b>	4. GPs 5. Pharmacies
<b>Community Facilities</b>	6. Dedicated Community Facilities 7. Libraries (Static and Mobile) 8. Post Office 9. Public House
<b>Education Facilities</b>	10. Secondary School 11. Primary School
<b>Access to Major Employers</b>	12. Employers with 100+ Jobs 13. Defined Town Centres
<b>Superfast Broadband Access</b>	14. Superfast Broadband Access
<b>Public Transport Access to Major Areas (Defined Town Centres &amp; Cribbs Causeway)</b>	15. Daily service with at least one before 9am and after 5pm 16. Weekend Service

17.5 Each of the 51 villages and settlements in South Gloucestershire, Yate/Chipping Sodbury and Thornbury were awarded points based on their sustainable access to the range of key services and facilities. Villages and settlements which have a good range of services and facilities within walking and cycling distance, have broadband and public transport access routes to a major centre, have the highest scores in this assessment.

### Question 9: Do you agree with the range of key services and facilities used for the assessment of sustainable access?

17.6 Based on points awarded during the assessment process, a ranking system, displayed on the next page, has been devised to give a broad indication as to the level of sustainable access to key services and facilities within South Gloucestershire's rural villages and settlements.

17.7 The assessment provides useful contextual information to consider sustainable access to key facilities and services across the rural areas of South Gloucestershire.

However, it should be noted that the scoring or ranking of a settlement based on this assessment will not be the only determinant of whether or not potential housing sites are progressed as an allocation in the PSP Plan. Further assessments of a sites suitability and deliverability are set out in sections 19, 20 and 21 of this document. In addition the effect of additional housing on a village or settlement's ability to function as a sustainable, high quality place which meets local needs will also need to be considered when making decisions on where and how much housing is proposed for allocation in the PSP Plan.

<b>Tier 1 - Excellent access to Services and Facilities.</b>	<b>Score 33 – 40</b>	Settlements in this tier have the largest range and type of retail & food shops, health, community, education and major employment facilities and services within walking and cycling distance. Settlement population has option of superfast broadband access and good public transport links to other major centres. Based on sustainable access to services and facilities a highly preferable settlement location.
<b>Tier 2 - Good Access</b>	<b>Score 25 – 32</b>	Settlements have a balanced range of services and facilities within walking and cycling distance, for some settlements this will include health care facilities. Some settlements have access to multiple retail, food shops or major employers. Settlement likely to have access to broadband and good public transport links to a major centre. Some settlements lack good walking and cycling access to one particular type of facility or service, often local shops (non-food) or permanent library.
<b>Tier 3 - Acceptable Access</b>	<b>Score 17 – 24</b>	Good walking or cycling access to at least two types of facilities and services (e.g. community facilities and education). Many settlements lack walking and cycling access to multiple retailers, food shops and employers. Many of these settlements unlikely to have access to health facilities. Any settlements with poor access to services and facilities in this ranking will often have good broadband and public transport access.
<b>Tier 4 - Poor Access</b>	<b>Score 9 - 16</b>	Many of these settlements have good access to a particular type of facility or services such as certain education facilities and community facilities. However, settlement will not have access to a good range of facilities and services. Many settlements do not have both access to both facilities & services, and broadband or public transport to major centres.
<b>Tier 5 - Minimal Access to Services and Facilities</b>	<b>Score 0 – 8</b>	Deficient in services and facilities in many of the categories, lacking any access to at least 3 to 4, from retail and food shops, health, education, community facilities and major employers. Many lack reasonable public transport access to other centres and broadband access.

17.8 Greater detail on the methodology and process used to assess sustainable access to key services and facilities from rural villages and settlements is provided in the South Gloucestershire Rural Villages and Settlements Topic Paper (2015) and associated appendices.

## **18. Step 1 - Sustainable access to key services and facilities in rural areas – ranking of villages and settlements**

18.1 The table on the next page displays the sustainable access to key services and facilities ranking of each village and settlement, based on whether the settlement and surrounding area is outside or within the Green Belt. Certain settlements appear in both categories as the surrounding area contains non-Green Belt and Green Belt locations.

18.2 Sites adjoining settlements in all ranking tiers will be considered as potential allocations, in line with the sequential approach set out as step 1 of the methodology and then subject to steps 2 to 4 of the assessment methodology.

18.3 However, it should be noted that the scoring or ranking of a settlement will not be the only determinant of whether or not potential housing sites are progressed as an allocation in the PSP Plan. Further assessments of a sites suitability and deliverability are set out in sections 19, 20 and 21.

18.4 The scale of growth appropriate in individual villages and settlements will be considered as part of step 2 and should respect the character of the existing settlement.

18.5 If no sites are proposed in villages and settlements, then no allocation can be made

18.6 Villages and settlements in all tiers may be suitable for continuation of infilling subject to local and national policy and subject to conformity of proposals with other development plan policies. This will allow for limited further growth and in line with our windfall allowance. Further development opportunities in all tiers can be considered by the community within a Neighbourhood Plan.

18.7 At this stage no analysis of the capacity of key services and facilities to support further growth has been undertaken. Therefore there is potential for settlements to move into different ranking tiers when this is taken into account. Similarly growth may deliver enhancements to facilities and services that cause a settlements' sustainability to improve.

18.8 Contextual demographic information on existing population size and dwellings numbers needs to be considered in parallel to this assessment, to inform whether a proposed site would proportionally be sustainable and appropriate in a rural location. This assessment is set out in Step 2, below

### **Question 10: Do you agree with the ranking of the rural villages and settlements?**

Please refer to the South Gloucestershire Rural Villages and Settlements Topic Paper (2015) for further details of this assessment process, scoring and ranking.

<b>Sustainable Access to Key Services and Facilities Ranking of Rural Settlements and Villages</b>		
<b>Access Ranking to Key Services and Facilities</b>	<b>Settlement with potential land Outside of the Green Belt</b>	<b>Settlement with potential land within the Green Belt</b>
<b>Excellent Access</b>	Yate Thornbury	Yate Thornbury Winterbourne
<b>Good Access</b>	Frampton Cotterell Coalpit Heath Charfield Engine Common	Frampton Cotterell Alveston Coalpit Heath Wick Almondsbury Hambrook Pilning Pucklechurch
<b>Acceptable Access</b>	Falfield Marshfield Severn Beach Wickwar Cromhall (Bibstone & Townwell) Easter Compton Hawkesbury Upton Oldbury-on-Severn Rangeworthy Old Sodbury	Marshfield Shortwood Iron Acton Tockington Bridgegate Bitton Easter Compton Oldbury-on-Severn Redwick Rangeworthy Siston Westerleigh Old Sodbury
<b>Poor Access</b>	Tytherington Badminton Horton Tormarton West Littleton Rockhampton	Hallen Olveston Tytherington Upton Cheney Rudgeway Aust Hortham Village Latteridge Old Down Cold Ashton Littleton upon Severn
<b>Minimal Access</b>	Acton Turville Hill	Elberton Doynton Hinton Dyrham

## **19. Step 2 - Assessment of the impact on the character of the existing settlements**

19.1 Allocations being made in the PSP Plan will need to boost housing supply to address the shortfall, but must also avoid causing significant harm to the character of settlements as a result. This requires appropriate and proportional levels of growth in individual settlements, which avoid significant adverse impacts on character, including social characteristics and physical form, which would outweigh the benefits of growth. Therefore, the effect of additional housing on a village or settlement's ability to function as a sustainable, high quality place which meets local needs will also be considered when making decisions on where and how much housing is proposed for allocation in the PSP Plan. The principle of this approach is set out in the Core Strategy (Policy CS5). It is not the role of the PSP Plan to fundamentally alter the existing character of settlements. The scale of growth is likely to vary from settlement to settlement. The council favours directing most growth to settlements with greater access to facilities and services but some limited growth may also be appropriate in smaller settlements.

19.2 However, the council recognises that boosting housing numbers in specific settlements to support or enhance access and availability of key services and facilities, may lead to more sustainable outcomes. Land use aspirations were established in consultation with local communities through previous engagement on the PSP Plan. Please find these listed, by parish, in Appendix 2 Community Aspirations.

19.3 If you are promoting an additional allocation, please use the call for site response form to tell us how your proposal is proportional to the existing size and character of the settlement. Please also state how your proposal will address/contribute to the community aspirations established during previous consultation rounds of the PSP Plan and listed at Appendix 2.

19.4 It should be noted that the assessments of impact on character of the existing settlement will not be the only determinant of whether or not potential housing sites are progressed as an allocation in the PSP Plan. Further assessments of a sites suitability and deliverability are set out in sections 18, 20 and 21.

### **Question 11: Do you have any comment on step 2?**

## **20. Step 3 - Methodology for assessing suitability of potential housing sites**

20.1 The purpose of the suitability assessment is to identify constraints/issues which would impact on a sites suitability for and quantum of development achievable within a 5 year timescale. Such constraints may be considered so demonstrably harmful that they outweigh the benefits of development (National Planning Policy Framework paragraph 14). Significant constraints and issues could also require comprehensive mitigation or compensation schemes which would push potential development beyond a 5 year timescale. In such cases these sites may be considered through the Joint Spatial Plan and new Local Plan Review processes.

20.2 In order to identify whether or not proposed housing sites are suitable for allocation within the PSP Plan, the following process will take place:

- 1) Sites above 150 dwellings, or parcels of larger sites will only be considered for allocation in the PSP Plan where it can be demonstrated that the site can be phased

such that the parcel(s) will perform as self-contained and sustainable development in its own right and be delivered within 5 years.

2) Sites will then be assessed based on the following considerations:

Current use	Is the site protected and still required for an alternative use including employment, educational, green space or community uses?
Heritage/archaeology	Would development of this site cause unacceptable harm to heritage assets including listed buildings, conservation areas, scheduled ancient monument and other archaeological assets?
Ecology	Would development on this site unacceptably affect ecological assets including ancient woodland, trees, habitats and protected species?
Landscape	Would development of the site have unacceptable impacts on landscape features, including the Cotswolds AONB?
Local Green Space nomination	Has the site been nominated by the community as a Local Green Space and has it been recommended by officers as suitable and justified for designation? Would its benefits as LGS outweigh its benefits as housing?
Flood risk assessment/surface water drainage issues	Is the site in areas of high Flood Risk (Flood Zone 3)?
Health & Safety	Are there any environmental impacts which would affect occupiers and neighbouring areas?.
Green Belt	If it is necessary to review Green Belt as a result of the sequential approach set out in section 16? A Green Belt review will be undertaken in accordance with the national purposes of Green Belt status

20.3 If a constraint is identified then the council will consider the potential to overcome any adverse impact taking into account the level of impact, the significance of the asset, the impact on the viability of the scheme, and the extent to which the site would make a contribution to housing delivery.

20.4 Provision of evidence relating to appropriate mitigation of known constraints will also provide evidence of achievability of development (see below).

20.5 It should be noted that the assessments of constraints will not be the only determinant of whether or not potential housing sites are progressed as an allocation in the PSP Plan. Further assessments of a site's suitability and deliverability are set out in sections 18, 19 and 21.

## **21. Step 4 - Methodology for assessing the availability and achievability of sites**

21.1 Similarly to site suitability criteria (see above), it is critical that sites can be demonstrated as being available and achievable within the next 5 years.

21.2 Landowners and developers will therefore need to demonstrate that the site is not subject to practical serviceability and land remediation issues, such that render the scheme unviable or that can only be dealt with via wider solutions that require agreement with landowners and interests offsite. Such issues may include but are not limited to:



Access to the transportation network	Sites should be readily and safely accessible, e.g. not requiring significant new highway to connect the site to the existing network.
Access to utilities.	Sites should be readily serviceable. Utility searches should be provided demonstrating that no significant new on or offsite infrastructure would be required that would threaten the viability of the site.
Existing services infrastructure	The site should be clear of existing services such as 240 & 440kv pylons and strategic sewers or it should be demonstrated that development schemes can accommodate such strategic infrastructure and consequential impact on dwelling numbers.
Contamination.	The site would not be subject to significant land remediation and decontamination works.

21.3 The Council is also keen to understand where the site is in the development process. Information on the following issues should also be provided:

Landownership and legal issues. Who owns the land, is the land for sale, any covenants and legal restrictions?
Developer interests. Is the land subject to an option agreement or been subject to developer interest? Has the site been subject to any site feasibility studies?
Has or is a consultant team employed, i.e. land agent, planning & highway consultant, architects etc?
Has a proposed scheme been viability tested against a policy compliant position (i.e. 35% affordable housing)?

21.4 Please use the response form provided. Landowners are advised at this stage not to commission significant new or additional professional advice to demonstrate deliverability. Subject to site suitability assessment the Council may seek additional information on deliverability prior to the Proposed Submission stage to inform proposed allocations. Please note that Freedom of Information regulations mean that the Council cannot treat evidence confidentially.

21.5 It should be noted that the assessments of deliverability will not be the only determinant of whether or not potential housing sites are progressed as an allocation in the PSP Plan. Further assessments of a sites suitability and deliverability are set out in sections 18, 19 and 20.

## **22. Conclusion of site assessment process**

22.1 In coming to a decision on sites which would be suitable, available and achievable for development to address the shortfall in the 5 year land supply the council will need to consider the results of the assessments above. It will also consider if place making objectives can be achieved, such as good design and access to education, health and open space is reasonably provided or can be provided for.

22.2 The results of this process will be set out in the Proposed Submission version of the document.

**Question 12: Do you have any other comments on the assessment process set out in Part 2?**

**23. Strategic Environmental Assessment/Sustainability Appraisal and Habitat Regulations**

23.1 The Proposed Submission version of the PSP Plan released in March 2015 was subject to full Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment. The findings of this SA are reported in the Sustainability Appraisal March 2015. Habitat Regulation Assessment of that version of the PSP Plan was undertaken at the same time (March 2015).

23.2 This consultation document has not been subjected to full Sustainability Appraisal or Assessment under the habitat regulations. It presents a methodology and evidence base to progress potential allocation of further residential sites, to address an issue with the 5 year supply of deliverable housing in South Gloucestershire. This consultation document does not contain suggested allocation sites to address the 5 year housing supply.

23.3 It is not considered a realistic alternative to progress with the current version of the PSP Plan or avoid exploring potential additional housing allocations, as the council currently does not have a 5 year housing supply, as required by the NPPF. However, as no sites or policies are suggested within this consultation document, it is not considered to warrant full sustainability appraisal or consideration under the habitat regulations at this stage.

23.4 Following consultation on this document, new residential allocations will be taken forward in a revised proposed submission version of the PSP Plan. These allocations, along with new policies or policies which have undergone significant changes, since the March 2015 version of the PSP Plan, will be subject to sustainability appraisal. The additional housing allocation sites within the proposed submission document, will also be subject to consideration under the Habitat Regulations and potentially appropriate assessment.

23.5 A revised Sustainability Appraisal Report will be presented at the time of the regulation 19 consultation. This report will set out the sustainability effect of; new residential allocations, new or changed policies and proposed mitigations where significant negative effects have been appraised. Statutory consultees will be contacted as part of the regulation 18 consultation on the PSP Plan, to confirm the approach to undertaking the sustainability appraisal and habitat regulation of this document.

**Question 13: Do you have any comments on the proposed SEA/SA approach and process.**

**Question 14: Do you have any other comments on this Consultation Paper?**

## Appendix 1: Authority's Monitoring Report (Early Extract 20/11/2015) - Five Year Land Supply Assessment

Covering the period 1 April 2014 – 31 March 2015

### Extract from 2015 AMR

#### Net additional dwellings in future years; and Managed Housing Delivery

<b>Assessment of Five Year Supply against Adopted South Gloucestershire Core Strategy CS15</b>		
A	Core Strategy minimum housing requirement 2006-2027	28,355
B	Completions 2006 to 2013	5,810
C	Remaining housing requirement 2013 to 2027 (A minus B)	22,545
D	Annualised housing requirement for the remaining years of the Core Strategy following adoption (C/14)	1,610
E	Five Year Requirement 2015 to 2020 (D x 5)	8,050
F	Completions 2013 to 2015	2,319
G	Under delivery since the adoption of the Core Strategy (D x 2 - F)	901
H	Under delivery annualised over the remaining plan period (G/12)	75
I	Annualised under delivery since the adoption of the Core Strategy over the next five years (H x 5)	375
J	Five Year Requirement 2015 to 2020 plus under delivery (E plus I)	8,425
K	Five Year Requirement including 20% "Buffer" (J x 20%)	10,110
L	Annualised provision required (K/5 years)	2,022
M	Total identified deliverable supply 2015 to 2020	8,659
	<b>Five Year supply surplus or deficit (M minus K)</b>	<b>-1,451</b>
	<b>Five Year supply (M/K x 100)</b>	<b>86%</b>
	<b>Five Year supply (M/L)</b>	<b>4.28</b>

Table 2.3

Source: Strategic Planning Policy and Specialist Advice (South Gloucestershire Council)

## Commentary

Para. 47 of the National Planning Policy Framework (NPPF) requires authorities to identify and update annually a supply of deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of either 5% or 20% to ensure choice and competition in the market for land. For the purposes of complying with paragraph 47 of the NPPF South Gloucestershire is a 20% authority.

Table 2.3 sets out the land supply calculations based on Policy CS15 of the Core Strategy.

The council has made every effort to ensure that at the time of preparing the AMR its forecasts of housing land supply are robust and incorporate up to date information. This includes: recent (September 2015) survey data on build progress of large housing sites; feedback / contact between the Council's Major Sites Team and landowners / developers on the likely timescales for the development of their sites; and independent market assessment of the completion assumptions.

Housing supply has been assessed based on the following:

- Residential development that is currently under construction;
- Unimplemented planning permissions;
- Sites where resolution to grant planning permission subject to S106 agreement;
- Sites allocated for development within the adopted South Gloucestershire Local Plan;
- Sites emerging through the Core Strategy and Policies Sites and Places DPD where there is a reasonable prospect of completion in the next five years; and
- Sites currently under pre application discussions where there is an expectation of the grant of planning permission within the near future.

The monitoring of the future housing supply is detailed in the "Housing Trajectory" (Appendix A of the AMR). The assessment reveals that the compounding effect of the development industry's under delivery against the annual Core Strategy requirement, has created a situation whereby the annual requirement is in excess of any previous years' completion rate since 1989. This is despite some 10,500 homes being available with planning permission.

The council's assessment, supported by independent appraisal, is that the ability of the development sector to construct and complete sufficient new homes to address this shortfall within the next 5 years (referred to as the "Sedgefield approach"), in the context of ambitious annual housing targets set out in the adopted Core Strategy, is not feasible or practical. The council recognises the desire, set out in the National Planning Practice Guidance, to address under delivery as soon as possible. However, the particular circumstances that exist in South Gloucestershire mean that it would be wholly inappropriate to calculate the housing supply requirement in this way as this would inflate the annual requirement to in excess of 2,100 units and result in a housing target that cannot be achieved. In short the council does not consider that it is possible to deliver this amount of housing over this period. Indeed, the development industry has never delivered in any single year more the 2,055 units since 1989 when records

began (South Gloucestershire Council: Residential Land Survey, April 2015). Therefore, in a change from last year's AMR, the housing trajectory is set on the basis of addressing under delivery over the remaining plan period to 2027 (referred to as the "Liverpool approach") as this provides a more realistic target.

The council is proactively using its Policies, Sites and Places Plan to consider the allocation of additional sites that are capable of addresses the identified shortfall in provision over the next 5 years. Further details can be found here: [www.southglos.gov.uk/policiesitesandplaces](http://www.southglos.gov.uk/policiesitesandplaces)

## Appendix 2: Community Aspirations

Aspirations, relevant to land use planning, have been identified with our communities through consultation in preparing the PSP Plan. These community aspirations are set out below.

The Council will seek to work with its partners including Town/Parish Councils and developers to try to achieve the delivery of these aspirations where opportunities arise. As aspirations they will have limited weight, are not policy and may not have any funding resource identified. However, in the event that an application comes forward and is relevant to one of the identified community aspirations in the Plan, the Council would have regard to this as a material consideration in the determination of such a planning application. The weight that can be attached will, to a large extent, be dependent on whether the decision taker considers there is a reasonable prospect that the proposal can come forward and complies with the statutory and legislative provisions required as part of determining a planning application. In these cases, further evidence may be required from the community, to justify the aspiration.

<b>Acton Turville Parish</b>
No community aspirations have been identified through the PSP Plan

<b>Almondsbury Parish</b>
Ensure adequate primary school places are available at Almondsbury school
Improvements in the rural transport network to complement the transport network in the urban areas
Provision of village shops/post office within the villages
Provision of new playing fields/green spaces

<b>Alveston Parish</b>
No community aspirations have been identified through the PSP Plan

<b>Aust Parish</b>
Provision of allotments
Provision of a play area
Support for delivery of a Park and Ride scheme by re-using the Greenacres site, and/or re-use the site for the provision of the above uses
Removal of wide load lay-by to improve safety/visibility
Off street parking for commuters and car sharers to avoid parking on Passage Road near its junction with the A403, and in the main street of Aust village
If and when a new power station at Oldbury is constructed, seek the appropriate routing of construction and other traffic

<b>Badminton Parish</b>
No community aspirations have been identified through the PSP Plan

<b>Bitton Parish</b>
Enhance the maintenance and signage of Bridleways/Public Rights of Way
Re-development of brownfield sites with appropriate community infrastructure
New play area(s)
Provision of a community and youth building
Multifunctional space with access to all throughout the Parish
Accommodation suitable for older people and smaller households
Support the principle of the extension of the Avon Valley Railway towards Bath, alongside the existing Bristol to Bath cycle/walkway

**Bradley Stoke Parish**

Enhanced public transport

Ensure adequate parking provision throughout the town

Seek sufficient health facilities in the town

Seek sufficient sports and leisure facilities

Seek additional leisure facilities - new cinema/theatre

Seek additional recreational areas and facilities – new public park, new allotments and remembrance garden

Seek additional recreational, leisure youth facilities – BMX / MTB track and skate park

**Charfield Parish**

Measures to reduce speed and provision of crossing facilities

Provision of a greater number and range of retail facilities

Seek improvements to road and pedestrian safety

Seek provision of youth facilities

Seek provision of allotments

Seek provision of local GP health facilities

Seek provision of café

Seek pedestrian and cycleway links to neighbouring towns and villages

Accommodation suitable for older people and smaller households

**Cold Ashton Parish**

No community aspirations have been identified through the PSP Plan

**Cromhall Parish**

Creation of a focal point for the community

Seek opportunities to consolidate or relocate community facilities in more accessible location/s

Seek improvements to local pedestrian access to facilities

Accommodation suitable for older people, smaller households and self- build



**Dodington Parish**

Seek opportunities to improve road and pedestrian safety through new development

Increase in number of single storey dwelling units in new housing development

Seek opportunities to increase capacity of community meeting space

Seek opportunities to improve and increase the capacity of formal and informal recreational facilities

**Downend and Bromley Parish**

Seek an increase in smaller, single storey dwelling units for older people

Seek increase in provision of sport facilities for young people

Seek opportunities to increase capacity of community meeting space in Bromley Heath

Seek provision of local GP health facilities

Seek to ensure that future development is carried out sympathetically and in keeping

**Doynton Parish**

Seek improvements to road and pedestrian safety

Additional and improved leisure facilities

Accommodation suitable for smaller households

**Dyrham and Hinton Parish**

Protect and enhance village hall's role as focus for community

Accommodation suitable for smaller households/starter homes e.g. 1-2 bedrooms or self-build

<b>Emersons Green Parish (Established in consultation with the now replaced Mangotsfield Rural Parish Council)</b>
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Ensure highway infrastructure is suitable for traffic demand
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Ensure local highway infrastructure and parking provision are suitable for traffic demand
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Provision of a link road between Emersons Green and M4
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Secure suitable allotment provision
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Provision of adequate library facilities
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Provision of built leisure facilities including for swimming
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Provision of facilities for young people
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Provision of public transport links between Emersons Green and Southmead Hospital
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<b>Falfield Parish</b>
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Improved public transport and links to nearby towns and village centres
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Seek additional and improvement of community facilities; in particular for play
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Ensure sufficient health, education and other facilities are available
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Seek improvements to road safety for cyclists and pedestrians
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Accommodation suitable for smaller households and older people (single story dwellings).
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<b>Filton Parish</b>
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Sufficient primary school places
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Protect and enhance facilities and accommodation for elderly people
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Make provision for smaller affordable lifetime homes
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Retain and enhance Engineering and Aerospace technology employment
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Regeneration project for the shopping area that fronts A38 from the Vets leading down to Church Road
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Seek improvements to the shopping area near the Bulldog Public House on Filton Ave, Northville
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<b>Frampton Cotterell Parish</b>
Promote and protect local sense of identity
Promote and protect suitable design in new development
Ensure sufficient suitable health facilities are available
Increased provision of and improvements to safe cyclist and pedestrian routes
Seek opportunities to improve local streets and public places to introduce safe places for play
Improvements to road and pedestrian safety measures, especially along routes which link residential areas and community facilities
Identify and protect buildings worthy of local listing
Promote and protect locally important landscape and street scape features; specifically green verges and pennant stone walls
Support for Community Green Energy projects
Promote small scale employment workshop units
Support for schemes which enhance visual amenity, pedestrian safety and recreational value of spaces along highways
Seek opportunities to create shared space and aesthetic improvements in residential areas which improve residential amenity and protect pedestrian and cyclist safety
Identify features of the built and natural environment which are most valued; these should be protected
Support planting of species which reflect local horticultural heritage
Increase capacity of community space in the Pavilion, School Road
Retain surplus school facilities for community use
Provision of additional playing fields
Protect areas of recognised wildlife value
Provision of facilities and activities for young people
Accommodation for smaller households, starter homes and self-build

<b>Hanham Abbots Parish</b>
Promote and protect locally important landscape features, such as dry stone walls

**Hanham Parish**

Ensure adequate parking provision especially in town centre

Improve traffic flow on main road highway infrastructure

Support a Park & Ride site close to Hanham

Promote and protect locally important landscape and streetscape features, especially pennant stone walls

**Hawkesbury Parish**

Improvements in traffic speed and parking

Better broadband speed

Improved public transport links

Introduce gas supply to village

Keep existing facilities such as shop, post office, school and pubs

**Hill Parish**

No community aspirations have been identified through the PSP Plan

**Horton Parish**

Accommodation suitable for smaller households (1-2 bed)

**Iron Acton Parish**

Improved public transport links

Ensure highway infrastructure is suitable for traffic demand

Ensure drainage and water supply infrastructure is suitable

Accommodation suitable for older people, smaller households and self-build (Iron Acton)

**Little Sodbury Parish**

No community aspirations have been identified through the PSP Plan

**Marshfield Parish**

Support for Community Green Energy initiatives and projects

Ensure adequate and suitable car parking to support village centre

Relocation and upgrade of doctor surgery

Ensure adequate primary school places are available

Improved public transport to access facilities out of village

**Oldbury Parish**

Ensure appropriate flood management arrangements are in place

Accommodation suitable for older people, families (3-4 bed) and smaller households (1-2 bed)

Concern has been expressed about the embryonic proposals for the new nuclear build

**Oldland Parish**

No community aspirations have been identified through the PSP Plan

**Olveston Parish**

Accommodation suitable for older people (people wishing to downsize) and smaller households

Improved public transport links with Thornbury and Bristol at suitable times of the day/night

Improved drainage

Improve traffic and parking arrangements in Olveston and Tockington

Increase provision and capacity of burial ground

Provision of recreation ground and play area in village

**Patchway Parish**

Ensure highway infrastructure is suitable for traffic demand and road, cyclist and pedestrian safety

Ensure connections develop to integrate Charlton Hayes residents into existing communities

Protect and enhance where possible existing community facilities

Enhance indoor and outdoor sport and recreation facilities

Supportive of retention and expansion of existing Gypsy & Travellers site

**Pilning and Severn Beach Parish**

Modernise and increase capacity of village hall

**Pucklechurch Parish**

Improve public transport and pedestrian/cyclist links and routes, particularly to and from Emersons Green

Modernise and increase capacity of existing village hall

Retain and protect employment land

Provision of suitable sports facilities

Support suitable development at Oaktree Avenue

Seek a new community hall in Shortwood

Provision of new facilities for young people

Improve access to facilities for people with disabilities and pushchair users

Accommodation suitable for older people

Provision of suitable sewerage infrastructure

Ensure there is good public transport

Appropriate management of traffic on local highway infrastructure

<b>Rangeworthy Parish</b>
Provision of suitable sewerage infrastructure
Ensure there is good public transport
Appropriate management of traffic on local highway infrastructure
Provision of allotments
Provision of recreation facilities for young people
Accommodation suitable for older people wishing to downsize

<b>Rockhampton Parish</b>
Suitable land drainage system and protection from flooding
Measures to control impacts of construction from Oldbury power station development
Affordable accommodation, suitable for young families from the local area, is seen as a priority

<b>Siston Parish</b>
Provision of additional allotments
Provision of a multi-use sports facility
Ensure suitable maintenance of community facilities and open spaces
Protection of condition of Commons
Wish to consider change of use from safeguarded employment at Chapel Lane to residential
Accommodation for older people, smaller households and self-build
Warden controlled sheltered accommodation with guest accommodation and facilities

**Sodbury Parish**

Provision of a community building in town centre with town council offices

Provision of allotments

Development of Old Sodbury School

Accommodation for smaller households/starter homes e.g. 1-2 bedrooms.

Area of land behind Community Orchard to be reclassified to enable development as a Car Park for visitors to the town

Consider provision of on-site parking/dropping off point at St John's Mead School

**Stoke Gifford Parish**

Enhance and improve the range and availability of community/sports facilities across the parish

Recognition of the draft Town Centre proposals

**Stoke Lodge and the Common Parish**

Newly established Parish (May 2015)- No identified aspirations

**Thornbury Parish**

Ensure sufficient facilities and infrastructure to support the large scale development already permitted

Protect the visual amenity and open character of some areas in the town

Protect and enhance long term employment opportunities

Provision of extra care housing, new hospital and health facility

Provision of single storey dwellings in new residential developments

Redevelopment of Thornbury Grammar school site should include provision of extra care housing and open space accessible to the community, especially given its proximity to town centre

**Tormarton Parish**

Ensure safe and sufficient parking provision

Provision of a park and share facility

Accommodation suitable for young families (2-3 bed)



<b>Tortworth Parish</b>
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Support and protect viability of Tortworth school and other community activities
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Ensure highway infrastructure is suitable for traffic demand and improvements in road safety
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<b>Tytherington Parish</b>
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Ensure suitable drainage and sewerage infrastructure to support growth in development
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Provision of suitable modern communication infrastructure
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Accommodation suitable for older people and smaller households to allow older people from all parts of the community to stay in the community
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<b>Unparished areas of Kingswood and Staple Hill</b>
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Provision of more and better quality open spaces in older areas
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Whitfield Tabernacle to be turned into a centrepiece for Kingswood and form part of a Wesley Heritage Trail
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Significant local buildings which are standing vacant to be brought back into use
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Improvements shop fronts and the public realm including promotion of disabled access
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Improvements to public toilets and public transport waiting facilities
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Support the evening economy, through lighting and public transport provision
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Pursue opportunities to centralise community facilities
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Improve bus links to hospitals
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<b>Westerleigh Parish</b>
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Provision of allotments
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Better access to medical services
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Improvements in public transport
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Accommodation suitable for smaller households and starter homes
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<b>Wick and Abson Parish</b>
Provision of hydroelectric system in local nature reserve
Protect local nature reserve
Provision and improvement of community facilities
Accommodation for smaller households (1-3 bed) and self-build (Wick)
The Parish Council would welcome and engage with any restoration of Wick Quarry into a sustainable concern. The Parish Council sees that a plan led approach using a consultative approach would lead to the best outcome for the community and the wildlife habitats. The Parish Council recognises that the quarry site offers potential opportunities for employment, academic research and educational leisure activities. However, this would have to be balanced by the existing constraints, including the site's Green Belt status, and the existing planning permission for the restoration of the quarry. The Parish Council acknowledges that, subject to overcoming all other planning constraints, the restoration of the quarry to maximise its benefits for biodiversity is best delivered through partnership working with key stakeholders, appropriate ecological surveys and a landscape and ecological management plan as part of any planning application

<b>Wickwar Parish</b>
Ensure highway infrastructure is suitable for traffic demand and improvements in road safety
Ensure provision of adequate and suitable infrastructure
Increase and promote use of open space for outdoor sport and recreation activities

<b>Winterbourne Parish</b>
Ensure provision of adequate and suitable infrastructure to support any future growth
Provision and improvement of public open space for informal leisure and community activities as well as formal open space and facilities for outdoor sport
Recognise adopted Village Design Statements
Accommodation for young people (1-2 bed)
Provision and improvement of play area and open space at Winterbourne Down

<b>Yate Parish</b>
Improvements to local highway infrastructure and public transport to improve traffic flow and links to key destinations
Protection of open spaces
Increase opportunities for small firms, self-employed and independent retailers to establish themselves
Identify and protect sites for community infrastructure
Protection of important heritage and conservation sites
Support for an arts venue at Elswick Park (formerly Sea Stores)
Support for integrated sports facility at YOSC
Enhance existing community buildings
Provision of additional allotments
Provision of facilities for older people
Provision of large venue for worship
Increase health provision in central location
Increase employment opportunities in existing industrial estates by intensifying retail related manufacturing and assembly
Improvements to facilities at Yate Station