

SOUTH GLOUCESTERSHIRE POLICIES SITES & PLACES PLAN
EXAMINATION

Inspector's Key Issues and Questions in bold text.

The following Hearing Statement is made for and on behalf of the Home Builders Federation (HBF) in regard to the South Gloucestershire Policies Sites & Places Plan (PSPP). This Statement responds to selected questions set out in the Inspectors Matters & Issues document. The following answers should be read in conjunction with our representations to the Local Plan pre submission consultation ended on 8th September 2016.

ISSUE 2 : Would Policies PSP40 (Residential Development in the Countryside) and/or PSP4 (Designated Local Green Spaces) act to restrict the supply of housing? If so, in light of the acknowledged shortfall in the Council's 5 year housing land supply when measured against the requirement in the Core Strategy, is this justified?

Policies PSP40 and PSP4 will restrict the supply of land for housing. This is not justified given the lack of 5 YHLS and the role of the PSPP in supporting delivery of the Core Strategy. The restriction on development in the countryside outside development boundaries (Policy PSP40) and the designation of Local Green Spaces (Policy PSP4) are inappropriate without any pro-active policies relating to the provision of housing land in the PSPP. The plan led approach should plan for all types of development. The NPPF (para 157) states that crucially a Local Plan should plan positively for development required and allocate sites to promote development and flexible use of land bringing forward new land where necessary.

4a) Would Policy PSP4 act to restrict the supply of housing? If it would, having regard to the Oxted Residential Judgement, is it nevertheless justified to include it in the plan?

Policy PSP4 will restrict the supply of housing. It is unjustified to include Policy PSP4 in the PSPP (also see answers to Issue 1 Question 1c and Question 4b below).

4b) In light of the shortfall in the housing land supply, is the designation of Local Green Space justified by reference to paragraph 76 of the NPPF? This states that identifying land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.

It is noted that the number of Local Green Space designations has been reduced because the Council have removed sites with known developer interests. However there remains a concern that the Council is still proposing to proceed with the allocation of a substantial number of Local Green Spaces

whilst at the same time not allocating any non-strategic housing sites or reviewing settlement boundaries in order to address the lack of a 5 YHLS.

The NPPF (para 7) defines sustainable development as comprising three dimensions economic, social and environmental and gains across all three dimensions should be sought jointly and simultaneously through the planning system (para 8). The decision to omit non-strategic housing allocations whilst continuing with Local Green Space designations is not in accordance with this joint and simultaneous approach.

Indeed by not allocating housing sites the Council is not investing in sufficient homes and therefore as set out in para 76 the designation of Local Green Space is not complementary to this investment. The NPPG (ID 37-007) confirms that “designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space Designation should not be used in a way that undermines this aim of plan-making”.

The appropriate approach is that development needs should be met first and only then should suitable land be designated as Local Green Space. So although sites on which developers have currently expressed interest have been removed other proposed Local Green Space designations may be suitable for development and may attract developer interests in the future. A Local Green Space designation would mean future development only in very special circumstances.

Furthermore there is a lack of 5 YHLS so Local Green Space designations may not be capable of enduring beyond the end of the plan period (para 76) because under para 49 of the NPPF “relevant policies for the supply of housing should not be considered up to date if LPA cannot demonstrate 5 YHLS”. When applying the widest interpretation of policies restricting the supply of housing (Richborough Estates Judgement) this would include Local Green Spaces designations.

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