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Your Ref: Ref

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Dear Sir or Madam

Policies, Sites and Places (PSP) Plan: Submission and publication of the Council's suggested modifications

This letter is a Representation to the above document, made on behalf of Square Bay, who is the freehold owner of land at Greenbank Road, Hanham. It is their aim is to promote this land for residential development through the local plan process, in parallel to ongoing pre application discussions with the Local Planning Authority.

Representations were made to the Proposed Submission: Policies, Sites and Places Plan in December 2016 (dated 7 September 2016) and the content of those representations stills stands; the South Gloucestershire Council (SGC) must allocate sites in the Policies, Sites and Places Plan. Not to do so directly contravenes the NPPF aim to 'boost significantly the supply of housing' (NPPF Para 47). Local Planning Authorities (LPAs) are expected to 'identify a supply of specific, developable sites' (NPPF para 47) in order to meet their objectively assessed need and provide an adequate 5 year housing land supply.

The following extract is taken from the draft PSP (Regulation 18) which the Council consulted on in November 2015¹ and was included in our previous representations, the point is very much valid:

'The council needs to take steps to ensure more homes are built in South Gloucestershire over the next 5 years that meet people's needs. Currently the shortfall over the next 5 years is around 1,500 dwellings and this consultation sets out the process by which the Council will aim to address it.

The objective is to make housing allocations that will support sustainable development and which can genuinely be built over the next 5 years to meet the growing demand. To achieve this Council needs to identify sites over and above those allocations in the Core Strategy, including within the rural areas.'

Clearly the Council recognises the need for housing allocations across the District. While the perceived conflict between a PSP document including housing allocations and the timescales for production of the Joint Spatial Plan (JSP) for the West of England is understood, it is considered that the Council's argument for leaving allocations out of the PSP as set out in 'Purpose and Scope of the PSP Plan November 2016' (paragraph 8.3 point 2) is flawed. The purpose of the JSP is to allocate strategic sites of 150 units and over. Therefore the allocation and delivery of sites of 150 units and under will not interfere with the spatial housing objectives of the JSP. Relying purely on strategic allocations seems

¹ https://consultations.southglos.gov.uk/consult.ti/PSP_Reg18_Nov2015/consultationHome

inappropriate given the pressing need for homes across the district and clear lack of deliverable housing sites.

Further to this we challenge the usefulness of a PSP with no site allocations and therefore the validity of the Plan preparation process. In the 'Purpose and Scope of the PSP Plan November 2016' the Council responded to our concerns over the need for more housing, by stating that applications will continue to be determined in accordance with paragraph 14 of the NPPF.

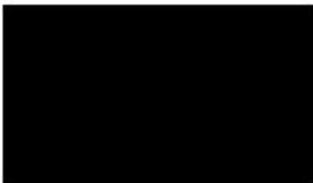
If the Council are relying on paragraph 14 of the NPPF and will not be bringing forward any new allocations (to resolve their five year housing land supply position) until a new Local Plan comes forward to replace the Core Strategy and PSP, it seems rather superfluous to progress with the PSP now when the policies relating to the supply of housing must be immediately disregarded in line with paragraph 49 of the NPPF which states:

'Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.'

The 'Local Plan Delivery Programme June 2016 Update' advises that the new Local Plan is expected to be adopted at the same time as the JSP; this leaves the Council open to further challenges and appeals for an extended period of time and provides the Development Industry with little confidence in terms of bringing forward sites for development in the short term.

The above comments are intended to be helpful. GVA request that we are informed of any further stages in the plan preparation process. If the Council would like to discuss any of the points raised please contact Jo Davis on [REDACTED]

Yours faithfully



Jo Davis
Regional and Senior Director
For and on behalf of GVA Grimley Limited