

## **Examination of the South Gloucestershire Local Plan**

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Examination web pages: <https://beta.southglos.gov.uk/new-local-plan/>

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12 December 2025

Patrick Conroy

Strategic Planning Policy and Specialist Advice Manager

South Gloucestershire Council

Dear Mr Conroy

## **Examination of the South Gloucestershire Local Plan**

### **Inspectors' initial questions**

1. We are writing to ask some initial questions which are posed to seek clarity and potentially narrow down the focus of our Examination. Please provide brief responses with reference to the main relevant evidence.
2. Your responses to our questions will help to inform the matters, issues and questions (MIQs) for subsequent discussion at the hearings, and the timetable for the examination. We reiterate that we are not inviting further submissions from any other party at this stage and will set out in due course when representors may make further submissions.

### **The Plan being examined**

3. We confirm that we are examining the South Gloucestershire Local Plan Regulation 19 2025 Consultation Document (the Plan), which was published for consultation in February 2025.

### **Scope of the Plan**

4. The Plan and the Council's Local Plan Delivery Programme (local development scheme) (CSD/06) are clear that the Plan is intended to become part of the development plan for South Gloucestershire and will supersede certain policies of the adopted South Gloucestershire Core Strategy 2006 - 2027 (CS) and the Policies, Sites and Places Plan 2017 (PSPP), as per regulation 8(5). The development plan for the area also includes the Joint Waste Core Strategy 2011 (JWCS) and made Neighbourhood Plans (NP).

5. The Council should reconsider the terminology used in Appendix 2 as regulation 8(5) is concerned with whether a policy is superseded or not, and therefore there is no provision to either 'delete' or 'save' policies. It would appear that CS policy CS9 and PSPP policy PSP47 would only be superseded in part. Please confirm the specific parts of those policies which would be superseded by the Plan such as by showing that in strike through text.
6. The Council should add the CS, the PSPP and the JWCS to the examination library. NPs can be added in due course where relevant to our examination.
7. There are some representations included in the schedules of representations made under regulation 20 (CDS/04b and CDS/04c) which relate to CS and PPSP policies which are not superseded by the Plan, and are not part of the Plan before us. We of course do not have any powers to recommend amendments to such adopted policies. However, representors who have made representations seeking to change the Plan (if they so request) would be given the opportunity to appear before and be heard by us.

#### **Proposed main modifications, additional modifications and changes to the Policies Map**

8. The starting point of the Examination is that the Council has submitted a Plan which you consider to be sound and ready for examination. At this stage there are only two means by which changes can be made to the submitted Plan:
    - (1) main modifications (MMs) recommended by the Inspectors
    - (2) additional modifications made by the Council on adoption.
  9. However, we can only recommend MMs if they are necessary to resolve problems that would otherwise make the submitted Plan unsound or not legally compliant. MMs are changes which, either alone or in combination with others, would materially alter the Plan or its policies. Any potential MMs must be subject to consultation and further Sustainability Appraisal and Habitat Regulations Assessment might also be needed.
  10. The 2004 Act, (S23 (3) and (4) in particular) is clear that Additional Modifications (AMs) must not materially affect the Plan's policies and are generally accepted to be the correction of typos, updating of document titles and dates etc. only. Changes beyond typos etc to either the policy or the reasoned justification are all MMs to be recommended by us. The Council is accountable for AMs and they do not fall within the scope of the examination, and they should be consulted upon separately.
- Q1 Would the Council confirm whether, should it be necessary, you wish us to recommend modifications to the Plan that would make it sound and compliant with the legislative requirements as per Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (the 2004 Act)?

11. The Council has provided with the submission documents a schedule of Proposed Main and Additional Modifications (CSD/05) and Appendix 1 – Regulation 19 Plan incorporating Proposed Modifications (CSD/05a). It appears to us that these proposed changes have not been subject to consultation and therefore for the avoidance of doubt, our examination will be of the submitted Plan.
12. On initial reading some of the AMs appear to be MMs. The Council should separate out the MMs and AMs into separate schedules as per the above. They can be provided to us alongside the Council's written statements in response to our MIQs. Please use the PINS template (Appendix 1) for these as attached to this letter. The Council should also number the MMs so that any changes proposed, say to Policy LPS1 and its reasoned justification, are set out together in a single MM. This would aid any MM consultation and our reporting later in the examination.
13. The Policies Map is not defined in statute as a development plan document and so we do not have the power to recommend MMs to it. However, MMs to the Plan's policies may require further corresponding changes to be made to the Policies Map. In addition, there may be some instances where the geographic illustration of policies on the submission Policies Map is not justified and changes to the Policies Map are needed to ensure that the relevant policies are effective. Accordingly, changes to the Policies Map (included at Appendix 4 of CSD/05) should also be in a separate schedule (with before and after maps provided so that the changes are evident and with deleted maps/boundaries shown in strike through. These should also refer to the relevant MM that makes them necessary).

### **Housing land supply**

14. Policy LPS3 – Delivery of New Homes – South Gloucestershire Housing Requirement in the 'Purpose' says that the range of sites will deliver a Local Plan that meets a requirement for a five-year supply of housing on adoption.
- Q2 Whilst there appears to be CS policies which are not to be superseded but nevertheless provide for housing land supply, would the Council confirm whether the purpose of the Plan is to provide for housing land supply of specific, deliverable sites for five years following the intended date of adoption (2027/28)?
- Q3 If the answer to Q2 is yes, the Council should provide up to date evidence in respect of housing land supply. Would you please provide housing land supply data for the year to March 2025, to include sufficient information for us to determine whether the listed sites which make up housing land supply, would meet the definition of deliverable as set out in the NPPF? We include our suggested format for this information in Appendix 2. Please also provide an updated housing trajectory as per NPPF 75. You should also provide an up to date calculation of housing land supply for the plan period as a whole, including

as appropriate, evidence as to why sites which are not considered to be deliverable, are considered to be developable as per the NPPF definition.

### **Strategic Policies**

- Q4 The Plan identifies which of its policies are strategic or non-strategic as per national policy. However, a number of proposed allocations are identified as strategic urban or village extensions but are indicated as non-strategic policies. Where in the evidence base would we find the justification for this?

### **Flood risk mapping**

- Q5 We are aware that the Environment Agency updated the National Flood Risk Mapping earlier this year. Would the Council please advise us of what, if any, are the implications of this for the Plan?
15. On receipt of this letter, the Council should make it available to all interested parties by adding it to the examination website. At this stage, we are not seeking, nor envisage accepting, any responses to this letter from any other parties to the examination.

Yours sincerely

*S Edwards      P Lewis      E Worthington*

INSPECTORS

## Appendix 1 – Main Modifications Schedule

The modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	20	3.4	This document <del>will</del> <u>forms</u> part of... <a href="#">[Delete this example]</a>
MM2	32	WC17	<i>In the last line:</i> ...the <u>potential</u> railway station... <a href="#">[Delete this example]</a>
MM3	44	8.1	<i>Delete the paragraph.</i> <a href="#">[Delete this example]</a>

## Appendix 2: Local Plan 5 Year Supply Site Proforma

The following information should be provided for every site that the Council assumes will contribute to current 5 year supply (from 1 April 2027).

### A. All sites with detailed planning permission, and sites of <10 homes and <0.5ha that have outline planning permission

Site name					
Local plan ref					
Total capacity					
Plan period completions					
Five year completions					
	2027/28	2028/29	2029/30	2030/31	2031/3
Completions					

These sites can be considered deliverable unless there is clear evidence that homes will not be delivered within five years.

### B. Other sites (including those of at least 10 homes or at least 0.5ha with outline permission, with a grant or permission in principle, allocations, or identified on brownfield register)

Site name					
Local plan ref					
Total capacity					
Plan period completions					
Five year completions					
	2027/28	2028/29	2029/30	2030/31	2031/3
Completions					

Clear evidence relating to:

<b>Developers' delivery intentions including anticipated start and build out rates</b>
<b>Current planning status and progress towards the submission of an application</b>
<b>Progress with site assessment work</b>
<b>Site viability</b>
<b>Availability: ownership, any existing uses, etc</b>
<b>Infrastructure provision</b>