

19 June 2012 Issue 2: Justification – The Evidence Base
Yate Town Council ID: 936417

1. We are concerned that at a number of key junctures in the document there is no evidence base for the allocations – mainly for historic reasons to do with the historic development of the document.
2. Yate had been rejected by South Gloucestershire Council consistently as not suitable for further major housing developing in all iterations of the Draft Local Plan (as it then was) until it was suddenly included in the draft RSS following the RSS examination in Public. The location had not been included by the Region in its draft RSS, and was only included following the EIP. At the EIP major developers including Heron, who own/control the land that has been allocated at Yate were participants, but because in the draft RSS presented by the Region to the EIP there was no mention of Yate we were unable to speak at the RSS. When the EIP draft was released, South Gloucestershire Council, the MP, local councillors and communities launched a massive campaign to explain why this was an unfounded allocation which gave rise to significant environmental and community issues. At that stage there was unity in opposition to it.
3. However, the Planning Authority, South Gloucestershire Council whilst opposing the revised draft RSS had a statutory duty at the time to ensure its Core Strategy was in compliance with the RSS, whilst in parallel arguing the draft RSS was defective. The South Gloucestershire Council Cabinet on 6th October 2008, resolved to ‘totally object’ to the RSS allocation of 3000 houses in Yate citing bad transport links, loss of Green Belt, flooding risks and unacceptable demands on the local infrastructure. Nothing has changed to remove any of those objections – but the Council, under an obligation to produce a Core Strategy compliant with the draft RSS as it then was proceeded to allocate the land, as it had a legal duty to do so, despite its objections.
4. Because the RSS process was then aborted, the responses to that draft RSS were never analysed and no revision in the light of that evidence published. So, the Core Strategy is being driven by a draft RSS proposal which was never tested against the evidence submitted. It was at that point an imposed given, untested. Had the RSS process continued to completion there would have been a requirement on the Secretary of State to consider the objections to the draft RSS as published by her for consultation following the EIP. If those arguments had been accepted the Core Strategy would then have been revised to deliver compliance with the RSS. Because it was aborted as a process this never happened, but equally when freed from the statutory duty to comply with the RSS South Gloucestershire never carried out a fundamental review of its locational strategy, and merely sought to justify allocations which by then had been imposed by an untested, aborted, process..
5. As a result, there was no ab initio review tested by evidence of the case for an allocation in Yate. There has been no evidential work published to justify this allocation – it was produced by the EIP which did not need to explain reasons based on only hearing one side of the story, and South Gloucestershire had a

legal duty to include it in the Core Strategy. We have argued in relation to legal compliance that this produces a compliance gap in that there has never been a clean sheet review of which sites, if any, should be allocated by South Gloucestershire. We do not consider the Supplementary Housing Paper, and in particular the approach set out in para 1.3 and section 3 of that document offers a sufficiently robust carrying capacity approach, instead it was dominated by a new land availability at Filton Airfield, and failed to review properly whether, freed from the RSS imposition any of the imposed allocations were sustainable. The document uses economic and employ growth figures as the basis for assessing housing need and does not do any modelling of environmental carrying capacity or sustainability. As such we consider the Supplementary Housing Paper is fundamentally flawed.

6. As a result the Core Strategy does not offer evidential justifications for the allocational choices – it reveals its origins as a Core Strategy under the old statutory regime where it was not for the Core Strategy to justify its locational decisions as these were determined by the RSS, and the Core Strategy was only obliged to justify which particular sites within an area of urban extension it was picking, not whether to have the extension at all.. Once the statutory duty to comply with the RSS had been removed, then the Core Strategy has to justify
 - Total figures for housing
 - Strategic locations
 - Specific locations

7. This document does the third, but by reason of its complex historic evolution does not do the second. We consider this lack of an evidential basis for the choice of strategic locations to be a fundamental weakness in law, and in the evidence base.

8. We are concerned that South Gloucestershire has also failed to test its strategy evidentially in a cumulative manner. As an example we refer to the traffic flows. There is evidence that South Gloucestershire Council has modelled the traffic impacts of each individual development proposal (although as they have been unable to supply us with origin and destination data for in and out flows from yate at peak periods we doubt the utility of the data – if the council does not know what current commuter movements are it is impossible for them to predict future ones reliably).

9. Putting aside this concern, there is no evidence at all that they have attempted the more complex modelling of looking at the CUMULATIVE effects of allocations. Where several developments impact upon the same traffic corridors for peak flow movements it is essential to model the cumulative impacts rather than each individual one in isolation, for example the impact of the release of greenbelt land to the west of the M32 on traffic flows around what is already a complex bottleneck of the ringroad/M32 junction – through which vehicles from all the housing proposed to the east at Emersons Green/Pucklechurch and at Yate needs to flow if commuting to the key centres of employment in the north fringe and Bristol.

10. There are also evidential gaps at a micro level – here we cite as an example the assumption made in the allocation that an unspecified but significant percentage of employment arising from the Yate/Sodbury allocation will be provided by home working (the plan only allocating 9 ha for 3558 houses). We have questioned that figure and asked repeatedly for the evidential basis upon from which that has been derived. We have not been supplied with any evidence from South Gloucestershire to underpin it. Without evidence to suggest this is a realistic allocation we are left with a speculative un-evidenced plan. We note that at para 14.2 the plan recognises that ‘a significant number of the working population commute elsewhere for work’, but there is no mapping of this and therefore of the potential to avoid that commuting or to calculate the impact of new residential development upon that

11. The lack of an evidential link is acute in relation to the link between Part Two of the Core Strategy which sets out the objectives and Part Three which contains the specific allocational decisions – partly for the reasons set out in relation to the historic genesis of the document. As an example, Section 4, Strategic Objectives has a strategic objective of “responding to climate change and high quality design”. It includes one objective to achieve that as “Using design to create attractive, cohesive, safe and inclusive communities with better integration between housing, jobs, services, public transport and facilities, so that people lead healthier lives and have the opportunity to reduce their CO2 footprint and adapt to the impacts of climate change “. Yet there is no mapping of the carbon footprint of commuting that will result. At no point does the Sustainability Appraisal ask the fundamental question of whether the strategy itself including the total allocation is sustainable - its entire focus is upon the pros and cons of each site, and where there were locational choices within neighbourhood allocations the relative merits. So, it evaluates the relative merits of the various Yate/Sodbury options for sites – but does not consider whether across the whole plan there were other sites that could have been considered or indeed whether the plan as a whole is sustainable. This was understandable and lawful at the point at which the RSS was determining the overall locational strategy and the SA carried out on the RSS would have considered those issues. However that was never completed as a process. So, the overall locational strategy as well as choices of individual sites within the locational strategy need to be subjected to the full SA process, including the consideration of alternatives such as doing less or doing nothing. The SA also needs to consider the cumulative effects of all the allocations. On both of these grounds we consider it inadequate.

12. We object to the overall housing numbers as well as their locational allocation. The Core Strategy is based on unrealistic and unsustainable housing targets (21,500), themselves derived from Barker, from national housing figures, and from a false assumption that this area of development should be entirely demanded, irrespective of whether people will be able to afford the product or it will destroy the very quality of life that makes the area attractive.

13. In our earlier submissions we have urged South Gloucestershire to carry out a ‘carrying capacity’ appraisal, to set the maximum level of housing and other development the area can handle in the plan period. We then believe the Council

needs a firmer evidence base about the optimum mix of rental and purchase, the real local level of 'affordability' and the best way of meeting the actual housing need to ensure sustainability (in the broad sense of economic, social and environmental sustainability). Otherwise we fear that we will be creating an unsustainable model that will require significant population inflow to sustain the house building without appropriate employment and infrastructure, because the housing delivered will be inappropriate to meet the perceived local need. We repeat that, as we believe that is fundamentally the appropriate way to maximise development without causing unacceptable harm to local communities, the environment and quality of life – all factors omitted from the Supplementary Housing Needs Paper.

14. This concept of carrying capacity links to our concerns about the Sustainability Appraisal.