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SOUTH GLOUCESTSHIRE CORE STRATEGY
EXAMINATION IN PUBLIC

MATTER 2 – JUSTIFICATION –
THE EVIDENCE BASE

On behalf of
WELBECK STRATEGIC LAND LLP

May 2012

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1. INTRODUCTION

1. This Statement has been prepared by Dominic Lawson Bespoke Planning on behalf of Welbeck Strategic Land LLP (hereafter “Welbeck”). Welbeck has land interests at Hacket Farm, Morton Way South, Thornbury.
2. This Statement responds to the Inspector’s questions posed for the Matters for Examination as detailed in the Programme for the Examination of the South Gloucestershire Core Strategy, 25 April 2012. This Statement deals with questions relating to Matter 2 – Justification – the evidence base.
3. We also refer the Inspector to Welbeck’s previous submissions on the Core Strategy. Welbeck has submitted representations in relation to the Core Strategy on six previous occasions as listed in the Introduction to our Matter 1 Statement.

2. JUSTIFICATION – THE EVIDENCE BASE

4. Welbeck has provided representations on the Core Strategy evidence base previously, see representations of February 2011 (SGC reference 4038145/1539, specifically paras 6-22, 45-49, 144-146 and 187-240) and February 2012 (SGC reference 4038145, specifically paras 8-22, 53-60 and 64-66).
5. We are providing a response to question 1:

Is the evidence base sufficiently comprehensive to support the strategy which the Council has put forward and, if not, what critical information is missing?

Response

6. We do not consider that the evidence base is sufficiently comprehensive to support the Core Strategy in particular with regard to the proposed housing numbers and allocations and in relation to the council's preferred option in Thornbury for a housing opportunity site.

Housing Need

7. Welbeck has commissioned a housing needs assessment which was prepared by Roger Tym & Partners. This demonstrated that the overall need for housing for South Gloucestershire is substantially higher than that proposed by the council in the Core Strategy. The council has disregarded the Department for Communities and Local Government (CLG) figures which are based on projected population growth to inform housing need in preference of an approach which considers, not housing need, but delivery of housing based on 'supply'. This has led to a much lower housing target across the district.
8. Welbeck considers that the evidence, produced at a late stage in the development of the Core Strategy, is fundamentally flawed. The Core Strategy is not based on a credible evidence base.
9. The council constantly relies on evidence that has been prepared after policies have been formulated, rather than taking the available evidence to inform and develop policies in the Core Strategy. This is clearly evident in its approach to housing numbers.
10. The council does not have a 5-year housing supply despite having prepared its Strategic Housing Land Availability Assessment (SHLAA). The council has disregarded suitable, deliverable and available sites such as Morton Way South as the site was not identified as the council's preferred option. The SHLAA forms part of the evidence base but is fundamentally flawed.
11. In relation to housing need in Thornbury the council has produced very little evidence to justify its proposed allocation of up to 500 dwellings. The Roger Tym & Partners report (see Welbeck Reps, February 2012, Appendix 1) commissioned by Welbeck demonstrates that there is significant need for additional housing in Thornbury, and that a more realistic target would be in the region of 1,000 dwellings for the period to 2026.

Thornbury

12. The council's evidence base in relation to the proposed allocation of Park Farm as a housing opportunity site has been produced after Park Farm was selected as the Preferred Option, or where the evidence was available it has been disregarded, eg the assessment of heritage assets around Thornbury (see Examination Document SG13).
13. The proposed allocation of Park Farm raises significant issues in relation to its impact on the historic and natural environment, flooding, transport and landscape. Welbeck will cover these in more detail in its Statement on Matter 27. However, we consider the following timetable of evidence production is significant.
 - Strategic Flood Risk Assessment Level 1, February 2009 (Examination Document EB29). This does not give any detail of the relationship between the six Core Strategy option sites and areas of flood risk in the Pickedmoor Brook catchment.
 - Assessment of the cultural heritage issues relating to potential growth areas around Thornbury – prepared by the council's heritage officers, dated January 2010, released to the public (via Freedom of Information Request) February 2012, added to the evidence base following a request by Welbeck. Park Farm is considered to be the least favourable option for development (Examination Document SG13).
 - **Proposed allocation of Park Farm as Preferred Option – March 2010;**
 - Justification for the Strategy for Housing to 2026, March 2011 (Examination Document EB21).
 - Strategic Flood Risk Assessment 2, December 2011 – identifies areas at risk of flooding in the Pickedmoor catchment, Park Farm directly impacts on functional flood plain, with Flood Zones 3a and 3b running through the middle of the Park Farm site (Examination Document EB31).
 - Review of Strategic Transport Case, May 2012 – attempts to justify the rejection of alternative housing sites in Thornbury based on inadequate and incomplete data (Examination Document RD41).
 - Thornbury Transport Review, May 2012 – attempts to justify the allocation of Park Farm but lacks detail and substance, particularly with respect to bus services (Examination Document RD42).
14. The council has relied on documents produced by Barratt Homes as part of its planning submission for development at Park Farm to justify its allocation.

Castle School

15. Part of the council's argument for the allocation of Park Farm is its close physical relationship with Castle School. The council has not produced any evidence that indicates that development at Park Farm will allow Castle School Sixth Form to relocate onto the Park Road site but it maintains this argument as justification/ enabling development for the allocation.
16. The council has not produced evidence to support the delivery of the proposed bus link from Park Farm to Park Road, nor has it provided sufficient evidence to indicate that the access onto Park Farm can be provided without increasing traffic congestion and safety issues in Park Road.

Conclusions

17. The council's evidence base is fundamentally flawed. The majority of evidence was produced after the housing numbers and housing allocations had been selected. Where evidence was available, for example in relation to the impact on heritage assets at Thornbury (Examination Document SG13), this has been disregarded. Furthermore, the Sustainability Appraisal has been prepared on the basis of this flawed evidence base and is itself flawed.

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