

**20 June 2012 Issue 7: Spatial Strategy and Location of Development  
Yate Town Council ID: 936417**

We have found it difficult to distinguish between this and the distributional question in Issue 8.

1. The Spatial strategy says most new development will take place within the communities of the North and East Fringes and that the Focus will be on those areas until 2016. In relation to Yate and Chipping Sodbury it states that as a strategy “new development will be **of a scale appropriate to achieve greater self-containment** and to improve the separate but inter-related roles and function of the towns, focusing on investment in the town centres and improving the range and type of jobs.”
2. Yet when we turn to CS15 and the allocation of housing numbers, on top of the 558 properties consented in the last three years in Yate/Sodbury currently at various stages of implementation we are being allocated a further 3000 dwellings. No explanation is offered of how this achieves greater self-containment as opposed unsustainable expansion. Nor is there an explanation of how it will improve the range of type of jobs, when the Core Strategy only provides for 9 ha of new employment land, relies extensively on redevelopment and intensification of existing employment areas, which may not be deliverable as it relies on a series of landowners and ends up topping up the figures to balance the employment needs against the 3000 proposed new houses by proposing home working (without supportive evidence of viability or deliverability). In the meantime, ALL of the 558 new dwellings consented since the RSS in 2008 are on former employment land, at Coopers Works, Sea Stores and Barnhill Quarry.
3. We consider that 3000 +558 additional properties, an addition of nearly 50% to Yate Town (or 20% of the whole Yate Sodbury area) is a major change that cannot be considered to amount to ‘a scale appropriate to achieve greater self-containment’. **We consider that in the last two years the market has pre-empted this over long awaited Core Strategy** by itself bringing forward to consent and implementation an appropriate scale of growth to implement the CS5 policy fully without further extension of dwellings in the plan period.
4. Until the EIP report on the RSS in 2008 no extension at Yate had been envisaged, but out of the blue that document recommended an urban extension of 5000 dwellings at Yate (and in our earlier evidence we have explained our concerns that this was never tested). Four years later, the Core Strategy has not yet been put into place to facilitate plan led growth, but instead the market has delivered what we consider to be ‘growth on a scale appropriate to achieve greater self-containment’. In 2008 it was not anticipated that the market would bring forward any substantial sites.
5. Despite this market led solution, there has been no revision to the figure of 3000 additional houses inserted in the Draft Core Strategy in 2009. We do not believe it ever did reflect the criteria of achieving greater self-containment, but if 3000 were the correct figure four years ago, we have already seen the market deliver 558 of them. So now we will be facing new development of 3558 - far more than was said to be needed for self containment.
6. We believe the residual allocation in CS15 should at most be the net figure, ie.3000 minus what the market has already managed to source within a mile of the proposed urban extension at Brimsham Park – i.e. at most a net 2442 dwellings – and then also minus the 600 which even the Core Strategy indicates cannot be constructed within the plan period i.e. 1842. However we argue that the figure of 558 dwellings consented and

therefore available to come to market as conditions demand offers an appropriate level of growth to deliver the CS5 policy of development of a scale to achieve greater self-containment.

7. We do not consider an additional 3000 allocation at Yate beyond the 558 identified, meets the criteria of
  - Sustainable patterns of development
  - Comprehensive planning for sustainable communities.
  - Climate change mitigation
  - Self-containment
  - Improving the local jobs:residents ratio and will therefore increase commuting.

There has been consistent regional, council and community opposition to further development of land at Yate for sustainability reasons since the 1980s. The land was only suddenly allocated in the SW Regional Strategy Panel report to the Secretary of State (See Appendix 1 of the Supplementary Housing Paper, which makes clear the urban extension at Yate of 5000 was only inserted at SW RS Panel Report state) following representation from developers at the Panel hearing. The Region had not proposed it, and nobody from the local community was permitted to give evidence before the Panel to rebut the claims of the developers – so we have never had the opportunity in a forum to test the claims of the developers. We consider there is no sustainability case for this allocation.

8. At para 6.4 the document says that the Core Strategy Objectives are:
  - Concentrating the majority of new development to take advantage of existing services and facilities and higher levels of accessibility
  - Locating development where it will provide the opportunity to minimise the need to travel and allow safe and convenient access to services by walking, cycling and public transport
  - Recognising and protecting the identity and heritage of existing communities
  - Promoting greater self-containment and enhancing the service centre role of the market towns of Thornbury, Yate and Chipping Sodbury
  - Supporting local housing needs and services in villages
  - Protecting the Green Belt and the countryside from inappropriate development
  - Providing a range of infrastructure, together with integration and access, in step with new development
9. Policy CS5 sets out the locations of development that the Council claims derive from the application of those objectives. There is no evidence that this scale of development will achieve greater 'self containment' with its net loss of employment opportunities, and without major expansion of community facilities. We already have all the major facilities a town of our size can attract and whilst we are campaigning hard with our MP to secure other facilities such as a cinema, the realities are that cinemas, hospitals and other facilities for the 'next size up' of town require a far larger catchment that we can achieve, even considering our hinterland. Whilst towns such as Yeovil or Andover can sustain such facilities, these communities are further from their 'big city' neighbours and can more readily sustain such facilities. Our relative proximity to Bristol makes people such as cinema providers reluctant to invest in the locality and there is no evidence that 3000 more houses would be critical to that.

**10. In conclusion we OBJECT to the both the allocation of significant housing numbers at Yate and to specific details within those allocations.**