

South Gloucestershire Core Strategy Examination in Public

Day 2 Wednesday 20th June 2012

**Matter 7 Spatial Strategy (Chapter 4),
 Location of development (CS5)**

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On behalf of

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MATTER 7 – SPATIAL STRATEGY (Chapter 4), LOCATION OF DEVELOPMENT (CS5)

1 Is the overall strategy consistent with sustainable development principles as contained in the Planning Framework?

1.1. The consequences for plan-making of the presumption in favour of sustainable development are set out in paragraph 14 of the NPPF:

“For plan-making, this means that:

- **local planning authorities should positively seek opportunities to meet the development needs of their area;**
- **Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change, unless:**
 - **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or**
 - **specific policies in this Framework indicate development should be restricted.”**

1.2 The overall strategy set out in paragraphs 4.3 – 4.6 of the PSC can be characterised in the following way:

- Concentrating new development in the North and East Fringe urban areas, with the aim of reducing commuting and the need to travel; accompanying this with a package of public transport measures and supporting development with community and green infrastructure
- Promoting greater self-containment of the two settlements of Thornbury and Yate/Chipping Sodbury.
- Supporting existing services and limiting new housing in the villages
- Protecting the open countryside

1.3 This general approach of promoting the vitality of the main urban areas whilst protecting open countryside and of managing patterns of growth to make the fullest use of non car modes of transport resonates strongly with a number of the Core Planning Principles set out in paragraph 17 of the NPPF:

- Proactively driving and supporting sustainable economic development to deliver homes, business and industrial units
- Taking account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the green belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it
- Actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable

1.4 The straightforward answer to the Inspector’s question, therefore, is that DF SR believes that the general approach is consistent with the NPPF and that, generally, it is based on sound principles of sustainability.

1.5 However, we have submitted throughout our representations DF SR’s belief that the Strategy does not go far enough in identifying and providing for the housing needs of the district and, to that extent, the Strategy does not accord with the NPPF’s Core Planning Principles:

“... Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;”

1.6 We have also submitted that the Core Strategy process has gathered sufficient information to enable enough land to be identified to meet the District's requirements for housing - for example, by increasing the agreed capacity of CPNN and including other sustainable locations, already identified by other parties.

2 Are there other spatial options which would be more likely to deliver better outcomes for South Gloucestershire during the plan period?

2.1 The 'urban edge first' approach is, we believe, the correct approach and, since it offers the best opportunity to provide the necessary infrastructure in the right locations in a way that will benefit existing residents and businesses, we believe that this is the most appropriate option.

2.2 Our concern is that the amount of housing required exceeds what has been suggested and provided for and that the shortfall is likely to occur in the early years of the Core Strategy period. Thus, there is likely to be immediate pressure for land to come forward that is not included in this otherwise well thought out spatial strategy. Thus, whilst we do not believe that there are other, better, spatial strategies we submit that this strategy, whilst appropriate, has not been extended far enough to accommodate the needs of the District, particularly within the first of the three CS15 phases..

3 Is the overall balance of growth between identified settlements clearly founded on the evidence base and is it likely to be effective in promoting sustainable development across the Borough?

3.1 In terms of spatial balance, DFSR entirely supports the general approach set out in Chapter 4, characterised in paragraph 4.5. The 'north and east fringe first' strategy will help to improve and promote sustainable development throughout the area and should also help to improve the sustainability of the adjacent BCC communities.

3.2 In terms of the relationship between the growth areas, we make the point in our responses to Matter 14 that we are concerned at the limited extent to which the transport strategy addresses east/west movement between the growth areas of the North Fringe and Avonmouth/Sevenside.

4 Is the spatial strategy deliverable in the plan period and have the risks to delivery been properly assessed.

4.1 The Core Strategy does not contemplate the risk of failure of any of the key locations to deliver development in the assumed numbers or of any of the key infrastructure to be provided. Consequently, it does not incorporate 'contingency' arrangements. The one 'contingency' site that was included in the Submission Core Strategy (the DFSR land) is now proposed to be an allocated site, but no further sites have been brought forward to take its place and fulfil its 'contingency' function.

4.2 Since the Core Strategy does not make 'contingency' provision, and since we believe that insufficient provision has been made for housing development in the first place, the answer to the Inspectors question is 'No'.

4.3 However, in terms of the levels of development set out in the PSC, the strategy is certainly capable of being delivered, provided that economic growth returns and that the infrastructure packages identified as being necessary are delivered in a timely and orderly manner.

4.4 We believe that the greatest risk to speedy development is the potential for slow delivery of the essential associated infrastructure, for whatever reason. There are only a few locations – for example, the DFSR land west of the A4018 – which are capable of being brought forward with few constraints and without massive infrastructure requirements.

4.5 From our involvement in the development of the CPNN infrastructure package and in other aspects of development it seems to us that the local planning authority's approach is

to attempt to manage risk on a site-by-site, neighbourhood-by-neighbourhood basis and this can be a perfectly reputable approach. However, it is a fact that the Core Strategy does not provide for meeting the consequences of significant failure to delivery, and we press the point that provision, particularly for housing in the early phases, which is DFSSR's principal concern in this case, needs to be increased and focused in areas where delivery is not constrained by major infrastructure works and therefore risks.

5 Is there sufficient flexibility in the CS to allow for change or unforeseen events?

- 5.1 It is evident from our answers to other questions, for example Question 4 above, that we do not believe that the Core Strategy yet builds in sufficient flexibility to allow for change or unforeseen events.
- 5.2 Our concerns relate to achieving the full development requirements of the district and we feel that the phasing opportunities for development. We believe that the alternative strategic sites need to be looked at in more detail, to see what could be brought forward in the event of the significant failure of sites/neighbourhoods to deliver the amount of development originally anticipated, in a timely manner.

6 Have the cross boundary implications of the strategy been taken into account?

- 6.1 SGC asserts that the Duty of Cooperation introduced by the Localism Act, does not apply retrospectively and Bristol City Council acknowledges that point (BCC representation to CS14, CS25 and CS26).
- 6.2 However, there is clearly a need for the authorities to work together, particularly in locations where the impacts of development are likely to be felt in immediately-adjointing areas of Bristol – for example, Filton Airfield and the land to the south of it have an especially sensitive relationship with the northern suburbs of Bristol.
- 6.3 We are aware of Bristol City Council's involvement during the CPNN workshops, and representatives of the north Bristol communities have also attended. In addition, arrangements for joint working are in place through organisations such as the LEP and WEP and we understand that recent joint meetings have taken place between the authorities at member level to discuss a range of cross-boundary issues.
- 6.4 On the face of it, therefore, the cross-boundary implications of the Strategy are well known and mechanisms for joint working are in place. Although there is a need for continuing inter-authority working, we have no reason to suppose that this will not happen satisfactorily.