

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

1.1 We fully support the overall spatial strategy to focus development at the fringes of Bristol, within strategic urban extensions, where there is greatest access to jobs and where there are opportunities to support vibrant communities as well as protecting the environment. This allows for smaller scale development at the market towns and within the rural areas and is fully in line with the NPPF.

1.2 The NPPF clarifies that there are three strands to sustainable development: economic role; social role; and an environmental role. However, we believe that these principles will not be achieved within the plan period because the Council has placed too much reliance on the North Fringe of Bristol, to accommodate over 50% of the districts housing provision (see 4.1 & 4.2 below).

1.3 We note that Bristol City Council has major concerns about the negative effect on employment provision and infrastructure in concentrating this level of residential development within the North Fringe and the impact of extending The Mall at Cribbs Causeway. In terms of the character of these areas, clearly there will be a significant change in character and there is significant doubt about the Council's proposals to re-profile The Mall and create an external high street alongside an internal high street of regional significance isolated from the resident community by surrounding car parks. There is also doubt about the closure of Patchway Trading Estate, the viability of achieving this and the effect of on local jobs. The City Council is also concerned about the loss of Green Belt at Haws Wood and we raise significant objections to the Council's Strategic Green Belt review in respect of the East Fringe in response to Matter 6.

1.4 The views of the City Council are relevant in respect of the economic and environmental role. In respect of the social role, the ability to create a comprehensively planned, high quality built environment including 5,700 homes with the necessary infrastructure in place in such a short period of time is in doubt. This is set out in response to Matter 7.

1.5 In this respect the strategy is inconsistent with sustainable development principles and the provision for a strategic urban extension at Warmley would assist in redressing this inconsistency.

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 option to develop land at Warmley, East Bristol, would fully comply with the objectives for sustainable development, as set out in response to Matter 28.

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 There is a need for additional development in the East Fringe – this is covered under Matter 28.

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

4.1 The risks to delivery have not been properly assessed. There is no robust assessment of phasing, no consideration of realistic assumptions and a complete lack of robust approach to timely delivery. There is no contingency in place within the Core Strategy should the simplistic delivery assumptions not be met. This renders the plan unsound in terms of its lack of positive planning and effectiveness and casts significant doubt on whether the Core Strategy will provide sufficient housing. This relates particularly to the reliance on the North Fringe area to deliver more than 50% of the growth proposed within South Gloucestershire over the plan period.

4.2 The Core Strategy makes provision for the development of more than 14,000 dwellings within the North Fringe and less than 4,000 dwellings within the East Fringe (assuming urban capacity is divided equally between the north and east Fringes and 2,400 dwellings are provided at Emersons Green). Figure 5 of the Core Strategy highlights this concentration of growth, within a 4km radius. The North Fringe is a focus for the district's employment provision and is sub-regionally important in employment terms. It also contains the regional retail centre of Cribbs Causeway and experiences significant congestion problems.

4.3 There are a number of significant challenges to the successful delivery of additional housing within this area, ensuring that infrastructure delivery is paced with housing development and that the developments are complete by 2027. However, there has been no assessment of the impact on development rates should development be delayed. Instead, testing of the phasing assumptions is left to monitoring, with the Core Strategy stating that, "*if necessary the timing of the land releases may be altered if land supply falls short*" (10.6b). But there is no flexibility to alter phasing within the North Fringe. The phasing/development programme at 12.7 states that up to 2016 the existing Local Plan sites will deliver (including Charlton Hayes, Filton North Field) and commencement of the new neighbourhood is expected. There is no opportunity to bring forward delivery.

4.4 Such a concentration of growth and reliance on this growth to commence pre 2016 is a high risk strategy, the following key issues will, undoubtedly, cause delay:

- Planning
- Delivery Rates
- Infrastructure delivery

Planning

4.5 Co-ordination and comprehensive planning of the new neighbourhood at Cribbs/Patchway will be achieved through a supplementary planning document. This will inform the planning applications from each of the land promoters/owners. Taking an optimistic view, this process in itself is likely to take at least three years, for

progression of the SPD, determination of the outline applications, determination of reserved matters and commencement of development. Delivery of housing on these sites pre March 2016 is highly unlikely.

4.6 Local evidence can be drawn from the experience of the existing local plan allocation of Charlton Hayes, on the Filton North Field. Here, with a developer involved throughout, the following happened:

- Planning application submitted in outline October 2003
- Local Plan Inspector confirmed allocation 2004/2005
- Planning application refused February 2006
- Decision appealed, appeal dismissed 2007
- Outline application resubmitted and permission granted 2008
- First reserved matters approved 2009
- Renegotiation of s106 post 2009
- First completions 2010
- March 2012 approximately 100 homes completed

4.7 During the Local Plan Inquiry, in 2003, we (then on behalf of BAE Systems & Bovis Homes) presented a development programme with an anticipated completion date of 2011. This was promoted on the basis that the application had already been submitted and development would commence yr 2004/2005 with the following completion rates:

2005 - 06 = 150 dwellings
2006 - 07 = 450 dwellings
2007 - 08 = 450 dwellings
2008 - 09 = 450 dwellings
2009 - 10 = 450 dwellings
2010 - 11 = 250 dwellings

Delivery Rates

4.8 The above assessment was based on Emersons Green, where at the height of that development, 1997 - 2001, an annual completion rate of 540 dwellings was achieved.

4.9 Assuming continuation of the Charlton Hayes development from today (approximately 2,300 remaining at April 2012), and commencement of the Cribbs/Patchway proposal (5,700 dwellings) in due course, this single new neighbourhood within the North Fringe will need to deliver 533 dwellings each and every year over the 15 year period.

4.10 There is absolutely no evidence to support this position. On the contrary, there is ample evidence which shows the delivery of strategic sites or neighbourhoods to only achieve up to 250 dwellings per annum at the height of their delivery period even where there are a number of housebuilders involved achieving a multi-centre start. Where few or single developers are involved delivery can be much lower. Barton Willmore, in respect of Matter 8 presents some evidence on this. My own current

experience includes Cambridge where Trumpington Meadows is expecting to deliver 120/annum and Northstowe 250/annum, and in Cheshire where strategic development at Ellesmere Port is expecting to deliver a maximum of 140/annum. At a recent inquiry regarding land at Malmesbury delivery rates for an urban extension of 2,600 houses at Trowbridge were discussed and again the evidence supported a maximum delivery rate (at the peak) of 300 houses a year, with most years only delivering 100 – 150 dwellings.

4.11 Even in the scenario of an over-optimistic continuous delivery at a rate of 400 dwellings per year at the new neighbourhood, from April 2012 throughout the plan period to March 2027, a shortfall of 2,000 dwellings would occur.

Infrastructure

4.12 Whilst the Council has provided a delivery plan, it accepts at note 1 to the table at para 10.5a (Dec 2011 CS) that the delivery of major new infrastructure is subject to confirmation from delivery partners. Any delay with the provision of infrastructure, will have a significant effect on the overall provision. No assessment of this risk has been made in the Core Strategy or in relation to the trajectory at 10.6B.

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

5.1 There is absolutely no flexibility within the Core Strategy for foreseen delay events as described above, let alone unforeseen events. There is no ability to bring forward the delivery of the new neighbourhoods, the Council has taken the most optimistic view possible in respect of the commencement and delivery rates at the neighbourhoods, presuming them to match the plan period rather than looking objectively at delivery periods. The Core Strategy is ineffective in this respect.

5.2 The Core Strategy already falls below RPG10 annual housing requirements and, more significantly, the assessment of need. In this deflated scenario, it assumes that all of the development identified will be delivered, with no contingency in place other than to rely on small sites coming forward 2012 – 2021 (post 2021, small sites are included in the trajectory, as per note 3 of the table at 10.5).

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

6.1 This matter is addressed under Matter 8 and Matter 14.