

1. Is the overall strategy consistent with sustainable development principles as contained in the Planning Framework?
2. Are there other spatial options which would be more likely to deliver better outcomes for South Gloucestershire during the plan period?
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?
4. Is the spatial strategy deliverable in the plan period and have the risks to delivery been properly assessed.
5. Is there sufficient flexibility in the CS to allow for change or unforeseen events?
6. Have the cross boundary implications of the strategy been taken into account?

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

The question presumably refers to the 13 sections under the main heading in the Planning Framework of 'Delivering sustainable development' and the fairly extensive text (for a succinct document) in paras. 18 to 149. To address the question could create a great deal of text in cross referencing the content of the 264 pages of the Core Strategy with these 131 paras. The finding might well be that plan uses many of the same words used in this section of the Planning Framework and espouses many of the same desirable themes, and on the face of it might seem satisfactory by this assessment. This detail however could fail to expose the big issues in planning for sustainable development that the plan simply avoids. These are that objectively assessed development needs should be met, and once opportunities have been identified for development within urban areas, the most sustainable locations for further growth to meet the economic and social requirements of communities will be on the immediate periphery of the largest urban areas. The use of such locations should only be rejected for very good reasons rooted in real evidence. SLP believes that the Core Strategy may pay lip service to the concept of sustainable development, and the Council may wish to present the plan as promoting sustainable development, but the reality is that the overall strategy is not really the product of applying sustainable development principles.

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

The content of the plan has been determined to an inappropriate degree by the limited interests of South Gloucestershire – the District and the Council – and not enough by what planning in South Gloucestershire can contribute to the West of England functional area of which it is part and to the achievement of more sustainable development (the statutory duty placed upon plan makers). If the plan did these things there would be other components of development included in the spatial strategy. There have been options put forward for consideration by the planning authority during the preparation of the plan which have been rejected but which should not have been.

There is clear evidence that there are other options for providing for development that would contribute to a more sustainable spatial strategy, and which are at least as good as parts of the proposed strategy and better than others. Including these in the Core Strategy would enable it to provide better outcomes during the plan period.

Development on the immediate eastern periphery of the urban area was identified in all of the options included in the Issues and Options version of the Core Strategy. This spatial option was taken no further when the Council heard of the Government's (still unimplemented) intentions for the revocation or abolition of Regional Strategies and promptly reduced the housing provision in the plan dramatically. This decision was in spite of the need for plans to be rooted in evidence and what

was said in paras. 32 and 33 of PPS3 about housing provision and in PPS12 about cross boundary working. Even if Government intentions in relation to cross boundary working and meeting development requirements were not made clear at some stages in the emergence of its policy, this is certainly not the case with publication of the Planning Framework.

It is all too obvious that the planning authority has proceeded by deciding what is acceptable and then setting and applying selection criteria that enable what it wants to do to look like what should be done. This approach is challenged here and in Position Statement 4 dealing with the Sustainability Appraisal.

The Council attaches great importance to the concept of self containment in justifying the proposed strategy, something that is understood to mean the proportion of economically active people living in a defined area that work in that area. The concept is most useful for comparing areas, subject to care in the size of the area considered, because the degree of self containment inevitably increases as the size of the area examined increases.

The plan strategy recognises that Bristol's North Fringe has a very high number of jobs relative to the numbers of residents and rightly pursues a strategy of increasing the numbers of homes in the area though with appropriate reassurances about the need to maintain the areas's economic significance to South Gloucestershire, Bristol and the West of England and the South West. This does imply a competition for land which is not fully exposed or resolved through the spatial strategy.

The plan uses the concept of self containment to direct development to Thornbury – where the level of self containment is relatively high – and to Yate where it is relatively low. It is striking that the plan also uses the concept of self containment to reject the previously favoured option of directing development to the eastern periphery of Bristol, notwithstanding that the level of self containment here is virtually the same as at Yate.

The evidence below shows that Yate has very similar self containment scores as the East Fringe and a lower employment density. This means there is a very low number of jobs compared to the economically active population. A high proportion of Yate's economically active population commutes to the North Fringe, Bristol and elsewhere, so that it acts to a fair degree as a dormitory town for the Bristol conurbation. This was recognised by the Inspector at the previous Local Plan inquiry (dealt with later in this Position Statement).

While it is right to look at the needs of individual towns such as Yate and Thornbury and to assess how much development would be required to fulfil their designated roles and what would be appropriate in terms of their own, internally generated needs, this must be still done in the context of the District as a whole and as part of a coherent District plan which responds to evidence arising over a wider area. The allocation of considerable housing development is not commensurate with the role and function of Yate. The intended provision is far beyond that which is justified by local needs and is not supported by enough existing or proposed employment to achieve greater sustainability by bringing about reduced levels of out commuting.

The Council originally acknowledged that the East Fringe could be an appropriate and sustainable location. This was deleted from the plan on the basis of Green Belt and local opposition and the Council are now arguing that the East Fringe is not an appropriate sustainable location, and that Yate is. The Council's preference for Yate follows spurious interpretation of the principle of localism with the wish not to locate development in the Green Belt, even if development adjacent to and east of Bristol would help create a more sustainable spatial strategy.

New development at the East Fringe together with associated transport infrastructure improvements would provide better access to employment and alternative modes of transport for its residents more than would be the case for new development at Yate. Development at the eastern edge of Bristol would seek to maximise opportunities for people to live and work close together and minimise out-commuting, and help ensure that the use of public transport/walking and cycling are maximised as a mode of travel to work. It is interesting that on the Council's evidence, the East Fringe has the highest number of local centres and parades as set out in table 3 page 98 of the Core Strategy.

The evidence set out below shows that the planned development of land on the eastern edge of Bristol with the early development of sites such as Oldland Common would enable the spatial strategy to deliver better outcomes for both South Gloucestershire, as part of the West of England.

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?

Parts of Bristol are in South Gloucestershire and much of the area of the District is close to the major urban area. Bristol is a very large settlement. Changes in the population and the economy of Bristol create a large part of the housing requirement over the plan period. Land within or on the edge of Bristol present the Council with the most sustainable locations in which to develop because of the access to facilities that the city provides. In this Core Strategy however, a significant amount of development is provided at dormitory settlements outside the main urban area of Bristol. Of the total new housing allocations in the plan (10,900) 30% (3,200) are provided at settlements other than Bristol. This is far too great a proportion of development going to settlements which do not represent the most sustainable alternatives. The justification for this distribution is solely based on the location of Green Belt and is not substantiated by the evidence base.

At the same time the Core Strategy makes no mention of smaller but still significant settlements with services where some development would be appropriate to maintain population levels with falling household size, to address affordable housing need and to help support local services.

Yate is considered by the Council to be a sustainable location and allocates 3000 homes to the north of Yate with 2700 homes to 2027, though the development is contingent upon major new strategic infrastructure. Adding this number of new homes to Yate would be likely to increase the population by 6,870 which would represent a 20% increase in the settlement. The new neighbourhood at Yate is allocated to achieve greater self containment as set out by policy CS5; however, this can only be achieved if the number of jobs is dramatically increased and directly linked with the number of new homes. It is not clear from the strategy what level of employment is allocated for Yate. The Section on the Economic Strategy states that '*a limited allocation of new development will be allocated in association with housing development in the new neighbourhood north of Yate*' which is then translated into 9ha in policy CS11. It is noticeable that the Council does not commit to the provision of a specific number of new jobs in the employment areas.

The evidence from the Census, and latest Population Estimates, and information from the Business Register Employment Survey demonstrates that Yate is not a more sustainable location for new development than the East Fringe. The arguments that the Council is running to dismiss the idea of development at the East Fringe are remarkably similar to those it is using to defend the allocation in Yate. This argument in favour of development at the East Fringe will be developed further in a Position Statement in relation to Matter 28. However, the key evidence for this submission is as follows.

Population and employment data for the four areas used by the Council are set out in figure 1. The wards that make up the areas are set out in Appendix 1. The balance between homes and jobs is a key sustainability indicator. This information shows that the North Fringe contains many more jobs than people. This is exceptional because the area provides key employment areas for the whole of Bristol and the West of England and not just for South Gloucestershire. All the other locations show a greater level of population rather than jobs. This ranges from twice as many people than jobs in Thornbury to over four times as many people living in Yate than there are jobs.

Areas	Population -resident in households (Census 2001)	Employment (BRES 2010)
North Fringe	57,560	60,924
East Fringe	93,540	26,316
Thornbury	13,344	6,212
Yate	34,122	8,122

	Population -resident in households (MYE 2010)	Employment (BRES 2010)
South Glouc	264,826	141,830

Fig 1. Population and jobs

This information begins to illustrate the likely levels of out-commuting from these areas. Out commuting should not be considered in isolation and should always be measured in terms of the population of the areas and also the self-containment score. Self-containment is a key part of sustainability and is the proportion of residents aged 16 – 65 who live and work in the same defined area. Travel to work area information demonstrates that Thornbury is the most self-contained (because of the employment opportunities within the ward). In the North Fringe, despite the high level of employment within the area, the self-containment rate is not that high. Yate and the East Fringe have the lowest scores due to the limited employment opportunities that exist.

Areas	TTWA Trips (out-commuting)	Self-containment	Self-containment %
North Fringe	29,781	6,046	20.3
East Fringe	47,821	8,851	18.5
Thornbury	6,877	1,985	28.8
Yate	18,572	3,573	19.2

Fig 3. Self Containment - Travel to Work Area data from Census 2001

These results can be illustrated graphically through the interpretation of travel to work area data which shows the distances travelled and method of travel. The graphs in Appendix 2 show that the East Fringe is the location which has the most people using the car (figure A), but also the most people travelling between 5 and 10km for work (figure B). The total amount of car travel per head of population is a fuller indicator of the sustainability of travel than the level of use of cars alone. The East Fringe also has the most people travelling by bus, as a passenger, on foot and also working from home. The evidence shows that Yate has the highest number of people travelling 10-20km. Although Yate has a train service this is not well used and the proportion of commuters who use trains for the journey to work is less than 1% (173 out of 18,572).

In terms of the overall level of employment within South Gloucestershire, 71.6 % of the jobs are located in the four locations analysed here. The table below, fig 6, shows the current distribution of jobs in these locations as a proportion of the total. This shows that the East Fringe has a

considerable proportion of the existing jobs in South Gloucestershire, and a far higher proportion than the dormitory settlements of Thornbury and Yate.

Areas	Employment (BRES 2010)	Distribution of jobs
North Fringe	60,924	42.9%
East Fringe	26,316	18.6%
Thornbury	6,212	4.4%
Yate	8,122	5.7%
South Gloucestershire	141,830	100%

Fig 6. Employment distribution

A sustainable approach in setting out a spatial strategy is one which seeks to achieve a better balance homes and jobs, amongst other things. While the Council is seeking new employment at the North Fringe and some employment associated with the Yate new community, it is not attempting to radically change the distribution of jobs. It can therefore be assumed that there will be a continuation of the present distribution of jobs.

Employment density is another useful measure of sustainability. The information below illustrates the number of people who are economically active people living within the area compared with the number of jobs that exist. Using the most up to date employment information from BRES (2010) the employment density can be calculated. A ratio of 1 means that there is an exact balance between the number of economically active living in a place and the number of jobs there. Many of the North Fringe wards have a considerable number of jobs, which is shown by a ratio above 1. In contrast some of the wards in Yate have a very low ratio which show a very low number of jobs in comparison to the economically active population.

Areas	Economically Active (Census 2001)	Jobs (BRES 2010)	Density
North Fringe	39,833	60,924	1.53
East Fringe	60,946	26,316	0.43
Thornbury	8,916	6,212	0.70
Yate	23,339	8,122	0.35

Fig 7. Employment Density

The evidence set out above illustrates that the East Fringe is more sustainable location than Yate. This evidence is fundamental to setting the spatial strategy and the distribution of development across the authority. Much of this evidence (TTWA information) remains unchanged since the previous Local Plan Inquiry. The Inspector in 2004 presented his views on the matter in his report at paragraph 10.4, saying, *'It seems to me that the council is entirely right to give first priority to the main urban area of Bristol and then to urban extensions to Bristol'*. He explicitly states that *'I have not supported the allocation of land for development around either of the towns, Yate or Thornbury'*.

The Inspectors words about Yate recognise the limited employment opportunities and the significant levels of out-commuting. The arguments the Inspector set out are still pertinent. He said that, *'if*

housing development were to be considered appropriate for the town, then it would need in principle to be accompanied by a commensurate level of employment development to, at the very least, not worsen the high levels of car borne out-commuting. Preferably, it should provide a net surplus of employment to bring some improvement to the situation. In practice, however, that would be achieved only if the new business space were taken up by employment of a type attractive to local residents, and without any resulting vacancy of existing space. It would certainly not be helpful for mixed use development allocations to be made if they turned out to result in even more out-commuting combined with either undeveloped employment land or vacant commercial buildings.'

In order to ensure the most sustainable development and balanced growth across the District it is important to understand the needs of the area. East Bristol contains a reasonable amount of employment and has a high level of population. However it does need to improve the employment opportunities locally and access to wider employment locations. Development in these locations should make provision on site for employment development to ensure that any new development does not worsen the situation. This could be achieved through the way the Core Strategy sets up the strategic allocations and the process for developing and determining strategic proposals. The demand for employment land to the east of Bristol is already high. An unwillingness to address this matter and to follow well established practice is patently not an in-principle reason for rejecting the option of development to the east of Bristol.

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

The amount of development provided for in the plan may well be deliverable in the plan period, but this is in large part because the overall provision is low in relation to the requirement and the District is part of an area where the housing market is very strong relative to other areas. Provided the strategy makes use of enough different locations and types of location, a higher level of provision, consistent with what the real requirement is and where it is arising, could be delivered within the plan period.

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

It is hard to assess what level of flexibility is sufficient to allow for unforeseen events, because the scale of the consequences of such events cannot be predicted. It must be the case however both that the fewer the number of (large) development locations included the more vulnerable the plan is to the failure of any of these, and the greater the number of genuinely different development locations there are, the more flexible the supply and the robust the plan becomes. This increased security of supply, added to the benefits of greater overall supply, greater choice and greater sustainability, reinforces the appropriateness of including development to the east of Bristol in the mix as part of the development strategy.

More flexibility would be provided in the plan if the Green Belt that is currently inhibiting even the consideration of the locations that are clearly going to have to be explored for development sooner

or later were changed in such locations, in order to ease the process of bringing forward development through a review of the plan when it becomes necessary to address development requirements. Identifying Green Belt land which should be safeguarded is a specific requirement on the planning authority from the Planning Framework.

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

The question might be asked the other way round. Has the strategy in the plan taken account of cross boundary issues? The expectation of proper spatial planning is that a plan responds to what the evidence is saying about how a place performs and such evidence is about places, communities, activities and functions, not about administrative areas. The answer to this question is evidently, no. The Council, the plan and the strategy never acknowledge cross boundary issues let alone address these issues. It is clear that if the cross boundary requirements were addressed as the Planning Framework intends, the housing requirement in the plan would be considerably greater and the use of land on the eastern edge of the urban area of Bristol for the creation of sustainable development would be a natural part of the strategy. This is a fundamental part of SLP's case for the Core Strategy to be different to what is currently presented.

The answer to the question as posed by the Inspector is also no. The strategy does not make enough development provision and it does not make provision for development on the eastern periphery of Bristol, both of which would be required if the plan was playing its part in managing the sustainable growth of Bristol. The implications of not doing so have been dismissed by the Council, or more likely not considered. The implications of failing to bring forward development east of Bristol will be felt by the local area, the District, Bristol and the West of England. Insufficient housing provision will restrict access to decent affordable housing generally, something which will harm less well off and less mobile members of the community disproportionately. The lack of provision in any part of the District will restrict access to housing for the new households arising in that area, inequitably and to the detriment of social cohesion, and in the Council's current strategy the community seeking its future in the area is penalised in the interests of influential members of the present community.

Appendix 1 - List of wards and their wider areas

North Fringe

- 00HDNW Bradley Stoke Baileys Court
- 00HDNX Bradley Stoke Bowsland
- 00HDNY Bradley Stoke Sherbourne
- 00HDPE Filton
- 00HDPN Patchway
- 00HDPU Stoke Gifford
- 00HDPZ Winterbourne

East Fringe

- 00HDPD Downend
- 00HDPG Hanham
- 00HDPK Longwell Green
- 00HDPH Kings Chase
- 00HDPL Oldland Common
- 00HDPM Parkwall
- 00HDPO Rodway
- 00HDPS Siston
- 00HDPT Staple Hill
- 00HDQA Woodstock

Thornbury

- 00HDPW Thornbury North
- 00HDPX Thornbury South

Yate

- 00HDQB Yate Central
- 00HDQC Yate North
- 00HDQD Yate West
- 00HDP A Chipping Sodbury
- 00HDPC Dodington

Emersons Green is not included in the above definition of the east fringe, because it is considered to be a stand alone area of the North East Fringe.

Appendix 2 – Travel To Work Information

Figure A - method used to travel

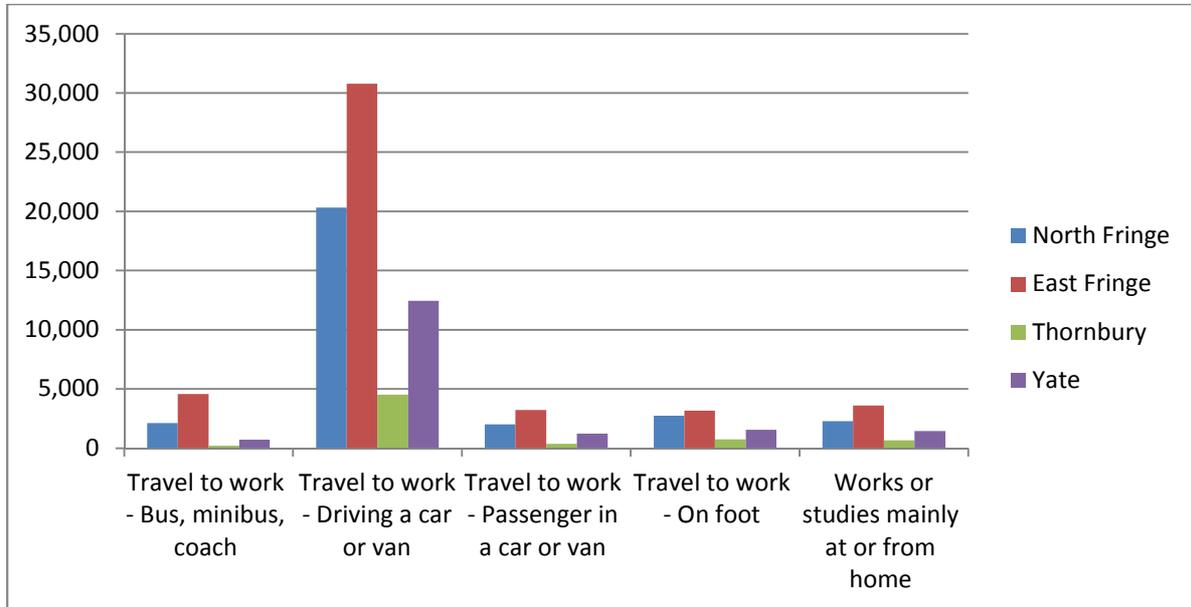


Figure B – distances travelled

