

EXAMINATION OF SOUTH GLOUCESTERSHIRE CORE STRATEGY

MATTER 7

SPATIAL STRATEGY (CHAPTER 4)

LOCATION OF DEVELOPMENT (CS5)

May 2012

Hearing Statement

On behalf of Welbeck Strategic Land LLP

Session date 20th June 2012

May 2012

Unless alternative contractual arrangements have been made, this report remains the property of Roger Tym & Partners until fees have been paid in full.

Copyright and other intellectual property laws protect this information. Reproduction or retransmission of the information, in whole or in part, in any manner, without the prior written consent of the copyright holder, is a violation of copyright law.

CONTENTS

0	INTRODUCTION.....	1
1	IS THE OVERALL STRATEGY CONSISTENT WITH SUSTAINABLE DEVELOPMENT PRINCIPLES AS CONTAINED IN THE PF?.....	3
	Building a strong, competitive economy (PF para 18).....	3
	Promoting sustainable transport (PF para 34)	4
	Delivering a wide choice of high quality homes (PF paras 47 and 159).....	4
	Promoting healthy communities (PF para 70)	6
	Conserving and enhancing the natural and historic environments (PF paras 109 and 126)..	6
2	ARE THERE OTHER SPATIAL OPTIONS WHICH WOULD BE MORE LIKELY TO DELIVER BETTER OUTCOMES FOR SOUTH GLOUCESTERSHIRE DURING THE PLAN PERIOD?.....	7
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?.....	9
4	IS THE SPATIAL STRATEGY DELIVERABLE IN THE PLAN PERIOD AND HAVE THE RISKS TO DELIVERY BEEN PROPERLY ASSESSED?.....	11
5	IS THERE SUFFICIENT FLEXIBILITY IN THE CS TO ALLOW FOR CHANGE OR UNFORESEEN EVENTS?	13
6	HAVE THE CROSS-BOUNDARY IMPLICATIONS OF THE STRATEGY BEEN TAKEN INTO ACCOUNT?.....	15

0 INTRODUCTION

- 0.1 Welbeck Strategic Land LLP is promoting residential development on land at Hacket Farm, Thornbury, known as Morton Way South. We made representations on the emerging South Gloucestershire Core Strategy on a number of previous occasions. To answer the questions now being asked by the Inspector, in this document we will use some of this earlier evidence, by referencing four of these earlier representations:
- i Representations on the Core Strategy Submission Version, February 2011 – referred to below as ‘Submission Reps’
 - ii Comments on ‘Planning for Growth’ Government Statement, May 2011– ‘Plan for Growth Reps’
 - iii Comments on Draft National Planning Policy Framework, September 2011 – ‘Draft NPPF Reps’
 - iv Representations on Core Strategy Incorporating Post-Submission Changes, February 2012 – ‘Post-Submission Reps’.
- 0.2 The present statement, like these earlier documents, focuses on the CS’s housing policies and in particular on the housing provision targets set out in Chapter 4 and later in Policy CS15. Three of the documents relate to the submission version of the Core Strategy, which is now superseded by the post-submission version. But these documents remain relevant, because between the two versions there were only two material changes in the housing target. Firstly, the target increased by some 4,000 homes due to Filton Airfield being added to the supply; and secondly, it was re-badged as a maximum figure, probably to reflect the risk that the airfield might not come forward in the plan period.
- 0.3 Our overall conclusion is that that the CS’s housing policies are unsound, because they do not aim to meet the demand and need for housing, they do provide for enough growth in Thornbury and they do not deal effectively with risk and uncertainty, either on the demand or supply side.

1 IS THE OVERALL STRATEGY CONSISTENT WITH SUSTAINABLE DEVELOPMENT PRINCIPLES AS CONTAINED IN THE PF?

- 1.1 Paragraphs 18-49 of The Planning Framework (PF) set out 13 headline principles, or objectives, under the heading '*Delivering Sustainable Development*'. Below, we comment on six of these objectives.

Building a strong, competitive economy (PF para 18)

- 1.2 The Post-Submission Core Strategy (CS), in Chapter 3: Key Issues, notes that continued economic prosperity is a '*key priority, given the importance of supporting economic growth and job creation in response to the recent recession.*' In Chapter 4, the 'Vision for 2026 and beyond' and 'strategic objectives' are generally positive supporting the District's contribution to the economy.
- 1.3 But these good intentions are not translated into a housing strategy that supports economic growth. A growing economy will need a growing labour force, and this in turn will need new housing. The CS recognises this link between jobs and housing in relation to the North Fringe of Bristol – where paragraph 3.10 of the CS notes that housing development has lagged behind employment growth and planning policy seeks to re-establish the balance between the two. But the same thinking is not applied to the District as a whole, or indeed the wider sub-region.
- 1.4 In our earlier Plan for Growth Reps, we show that South Gloucestershire in recent years has been one of England's economic hotspots (a message reinforced by the latest West of England Local Economic Assessment (December 2011), which is not an examination document but can viewed here: <http://www.westofengland.org/research--statistics/economy->). Thus over the last full economic cycle (2000-08) the District's employment growth was the sixth greatest of any local authority in England; of all the net new jobs in the West of England ('Greater Bristol') three quarters were in South Gloucestershire. Yet housing lagged behind employment: of the total population growth in the West of England, South Gloucestershire accounted for just 19%. So the sub-region's new jobs have been concentrated in South Gloucestershire, while new residents have been concentrated in Bristol City and North Somerset.
- 1.5 If planning is to support sustainable economic growth, it must ensure firstly that growth is not constrained by a shortage of labour, and secondly that workers live close to jobs, so that they do not travel far to work. The CS in setting its District-wide housing target ignores this consideration. As shown in our Post-Submission Reps (February 2012, Appendix W1), the target of up to 26,400 net new homes in 2006-27 (CS paragraph 4.4) is based entirely on the Council's view of supply capacity, with no reference to demand or need – including economic need.
- 1.6 As we also discuss in the Post-Submission Reps, the Council's Housing Justification Paper (Examination Document EB21), which sought retrospectively to vindicate an earlier target of 21,500 new homes, provided an employment scenario which suggested that this

target would align housing with jobs. While this scenario is difficult to follow, we believe that it is flawed, being based on the assumption that employment growth rates across the West of England converge – so growth slows down in South Gloucestershire while it speeds up in Bristol City, North Somerset and BANES. There is no evidence to support this assumption, nor is reflected in the authorities' employment land policies or their supporting evidence bases.

- 1.7 In summary, the CS housing target of up to 26,400 net new dwellings is not based on any consideration of economic need. If this target is upheld, labour shortages may constrain economic growth in a District which has exceptional economic potential, contrary to the PF's sustainability objectives.

Promoting sustainable transport (PF para 34)

- 1.8 As discussed in the last section, the CS's housing target will aggravate the existing imbalance, whereby housing and population growth in South Gloucestershire have lagged behind employment growth. As well as (or possibly instead of) constraining the District's economic growth, this imbalance is likely to result in longer journeys to work, as South Gloucestershire attracts even more in-commuters from an even wider area – especially given that Bristol's Core Strategy also provides much reduced housing development. This outcome would be contrary to the PF's objective of minimising the need to travel.

Delivering a wide choice of high quality homes (PF paras 47 and 159)

- 1.9 The mention of housing market areas requires explanation: how can an individual authority ensure that needs are met in a whole housing market area, which will nearly always cover several authorities? The answer is that authorities should work together across HMAs.
- 1.10 As demonstrated in our earlier representations, most recently in the Post-Submission Reps (February 2012, Appendix W1), the CS's housing target is not based on assessment of demand or need, but only on the Council's view of the District's development capacity. The target is a maximum: it implies that any level of housebuilding up to 26,400 homes, including no homes at all, would be acceptable. The maximum provision amounts to 1,259 homes per year. This is well below the latest CLG projection, which in the absence of evidence to the contrary is the accepted indicator of housing demand and shows some 1,600 new households per year. Therefore the CS does not meet the 'objectively assessed need' for housing in the District.
- 1.11 Still less does the CS make its due contribution to meeting need in its wider housing market area, the West of England. Table 1.1 below compares the latest CLG projections across the area – which as noted earlier are the default indicator of housing demand – with Core Strategy housing targets.
- 1.12 In total, the HMA's four authorities propose to provide 4,100 net new dwellings per year over the plan period. This amounts to just over half of the likely demand, as measured by the CLG projections, of 7,800 dwellings per year. Bristol in particular has a deficit of planned provision against estimated demand of 2,100 dwellings per year – which, as the

Core Strategy Inspector accepted, reflects severe capacity constraints. But none of the other authorities in the HMA attempt to correct this deficit. This is contrary to the Planning Framework: as we have seen, the Framework requires authorities where supply is constrained to export demand to neighbours which can sustainably accommodate that demand.

- 1.13 South Gloucestershire is one such neighbour, as demonstrated in our Plan for Growth Reps (May 2011). The document shows that the area between Thornbury and Yate is unconstrained and could accommodate significant housebuilding – not in the open countryside, which would be unsustainable, but on the edges of Thornbury and Yate. There is capacity there for development over and above the current CS target, in sustainable locations accessible to employment areas in the Bristol fringe.

Table 1.1 Household projections and housing targets¹ in thousands of dwellings

Local authority	Change 2006-26	Change p.a. 2006-26	Source
CLG 2008-based projection, 000 households			CLG
Bath and North East Somerset	16.0	0.8	CLG
Bristol City	72.0	3.6	CLG
North Somerset	36.0	1.8	CLG
South Gloucestershire	32.0	1.6	CLG
West of England total	156.0	7.8	CLG
CS targets, 000 dwellings			
Bath and North East Somerset	11.5	0.6	Schedule of Rolling Changes to the Draft Core Strategy for consideration by the Inspector, February 2012
Bristol City - target	30.6	1.5	Adopted CS, June 2011
North Somerset - minimum	14.0	0.7	Adopted CS, April 2012
South Gloucestershire - maximum	25.1	1.3	Post-Submission CS, December 2011
West of England total	81.2	4.1	

- 1.14 The Plan for Growth Reps focused particularly on Thornbury, where Morton Way South would provide deliverable housing capacity over and above the CS target. The analysis in that document, based on demographic modelling, concludes that even if there were no migration at all, to meet its indigenous demand Thornbury would need to provide 800 net new dwellings over the plan period (paras 34-43).

- 1.15 These 800 dwellings are a floor below which the town's housing land supply should not fall. If the town provides land for less than 800 units, it will be planning for decline – exporting its indigenous need to other places. This would be wrong, because Thornbury has the capacity to meet that need sustainably.

- 1.16 If it provides for 800 dwellings, Thornbury will be making just enough room for local people; but it will make no contribution to wider housing need. This would also be wrong, because Thornbury has unconstrained sites, and therefore it is capable of making a substantial contribution. For this, the town's housing land supply needs to rise significantly

¹ Housing provision targets are usually some 3% more than expected numbers of households, to allow for vacant dwellings. For simplicity, we ignore this adjustment.

above 800 houses... therefore the Core Strategy should be amended to plan for considerably higher amount of housing, at least 1,000 dwellings.

- 1.17 In summary, the CS's housing targets, both for the District as a whole and for Thornbury, are not consistent with the PF's sustainability objectives. South Gloucestershire has no excuses: it has the capacity to accommodate more of its own demand, and overspill demand from other parts of the HMA, than the CS proposes. Some of this capacity is in Thornbury – where, in order to help meet wider housing needs, provision should be at least 1,000 homes.

Promoting healthy communities (PF para 70)

- 1.18 Our comments here focus on the community of Thornbury. The CS's objectives for that community, at paragraph 4.25 of the CS, are perfectly consistent with the PF's principles. However, as our 2011 Plan for Growth Reps demonstrate, the proposal to provide just 500 dwellings in Thornbury over the plan period (paragraph 4.25 and Policy CS5) does not support these objectives (see May 2011 rep, paras 34-43) .
- 1.19 The CS in Chapter 3 notes that Thornbury is already showing signs of decline, with the health of the town centre deteriorating, the population falling and ageing, and spare capacity in primary schools. If only 500 new dwellings are provided over the plan period – less than even the 800 new dwellings required by the existing population and their descendants – there is little chance that the town centre and community facilities will be strengthened and improved, as the CS wants them to be.

Conserving and enhancing the natural and historic environments (PF paras 109 and 126)

- 1.20 The Core Strategy goes against this advice in identifying the Park Farm site to the north of Thornbury for housing development (paragraph 4.25). As shown in our earlier Submission Reps and Draft NPPF Reps, development on this site would harm an attractive and historic area on the edge of Thornbury, blocking views across beautiful buildings and their grounds to the open countryside. It would also adversely affect the setting of listed buildings and the Thornbury Conservation area and the medieval fishponds scheduled monument that are located adjacent to the site. Park Farm, therefore, should not be identified for development, given that more sustainable alternatives are available.

2 ARE THERE OTHER SPATIAL OPTIONS WHICH WOULD BE MORE LIKELY TO DELIVER BETTER OUTCOMES FOR SOUTH GLOUCESTERSHIRE DURING THE PLAN PERIOD?

2.1 As discussed above, better outcomes for South Gloucestershire and its wider sub-region can be delivered if the Core Strategy:

- Provides for more housing development District-wide;
- Provide for more housing development on the edges of Thornbury and Yate;
- Does not identify the Park Farm site to the north of Thornbury for development.

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 For reasons set out in Section 1 above, we consider that sustainable development would be better served by additional housing development on the edges of Thornbury and Yate, and in particular at Morton Way South to the east of Thornbury.

4 IS THE SPATIAL STRATEGY DELIVERABLE IN THE PLAN PERIOD AND HAVE THE RISKS TO DELIVERY BEEN PROPERLY ASSESSED?

- 4.1 South Gloucestershire has an outstanding record in under-delivery of housing against planned provision. This is due to a focus in recent times on a few very large sites on the fringes of Bristol, with significant and usually under-estimated lead-in times both in their planning and delivery. These large sites are also more susceptible to the current poor market because they offer a certain type of housing product in a certain type of (large estate, suburban) location.
- 4.2 The CS continues this pattern. It does not offer sufficient choice and range of locations for new housing, nor sufficient choice of development size site (see our Matter 8A statement, question 3 (phasing)).
- 4.3 The prospects of delivery of the already low housing numbers proposed in the CS would be greatly enhanced with the addition of medium-sized sites, eg. 500 dwellings in more marketable locations, such as Morton Way South, Thornbury (see our Matter 8A statement, question 2).

5 IS THERE SUFFICIENT FLEXIBILITY IN THE CS TO ALLOW FOR CHANGE OR UNFORESEEN EVENTS?

5.1 The PF advises that *'Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change'*. The CS does not do this, because its housing provision target is precisely equal to the supply capacity that the Council has identified. Thus there is no spare capacity, or buffer, that could accommodate demand over and above the target.

While the CS's housing numbers have no upward flexibility, they are very flexible downwards. As noted earlier, the CS's provision target – which should be based on an assessment of need, but in fact is based on supply capacity - is formulated as a maximum, so its downward flexibility is infinite. In relation to this supply capacity, the Core Strategy states that if Filton Airfield – which would contribute about 4,000 homes – does not come forward, *'the Council will not seek to compensate with alternative housing provision elsewhere.'* Rather, the Council may undertake an early review of the Core Strategy, presumably with a view to reducing the target. This is not the kind of flexibility that the PF seeks.

6 HAVE THE CROSS-BOUNDARY IMPLICATIONS OF THE STRATEGY BEEN TAKEN INTO ACCOUNT?

6.1 They have not, as demonstrated in Section 1 above (paragraphs 1.11 onwards).

Word Count: 2719