

**20 June 2012 Issue 8: Provision and Distribution of Housing  
Yate Town Council ID: 936417**

1. We object to the overall increase in housing numbers contained in CS15 since the original Draft Core Strategy in addition to our objections to the original allocation of 3000 houses at Yate. We do not accept that this additional housing is needed at all, but if it is needed, we consider Filton offers a more sustainable location for residential development than Yate – to allocate it in addition has the effect of making the sustainability issues associated with Yate even worse, putting yet more vehicles onto key travel corridors at peak times
2. If the overall number of houses is accepted by the EIP as the correct figure, then we strongly object to the locational allocation contained in CS15.
3. Likelihood of implementation within the plan period
  - 3.1. Our first objection is that the Core Strategy has to be realistically capable of implementation. Quite apart from our highway, community and other infrastructure objections it is accepted by South Gloucestershire that a fundamental problem is the provision of sewage infrastructure. When I spoke for Yate at the 1988 Yate/Sodbury Local Plan inquiry, it was accepted that Yate could not deliver more than 900 dwellings (the developers wanting to build on the entire area to Tanhouse Lane at that point, as they do not).
  - 3.2. A key constraint at that point was, and remains, sewage infrastructure. A temporary solution was achieved to facilitate the 900 dwellings by building a holding capacity to deal with peak period flows, retaining them for later discharge. That solution is at its limits.
  - 3.3. The Core Strategy in CS5 makes the provision of new sewage infrastructure a condition for the release of land for a new neighbourhood at North Yate. This is not phrased as a matter that will need to be implemented to support development, but rather is set out in the plan as a condition to the release of the land at all. The necessary infrastructure is not a small piece of work, but involves major work right down the Frome Valley across miles of Green Belt. It is not currently in the forward works programme for the Sewage Authority and as far as we can ascertain there is no funding stream identified, beyond developer funding.
  - 3.4. We recognise that it is common for developers to need to fund some offsite works associated with their development, but this sort of major operation is of an altogether different scale. We have no evidence that the state of the property market will enable this funding to come forward during the plan period.
  - 3.5. Accordingly, we do not believe the allocation at Yate should be included unless or until there is certainty that the sewage condition can be met (we would still object on other grounds, but we consider this a specific separate

point). We consider therefore that CS5/CS15 fail the test of being realistically implementable during the plan period.

4. Allocation of dwellings which CS15 says will not be delivered in the period.

Even if that point is not accepted, Table CS15 only provides for the allocation of 2400 dwellings within the plan period and says 600 dwellings, that is 20% of the total CANNOT be delivered within the plan period. In Yate the proposal is to phase the development from 2016 onwards. As it is proposed that 20% of the 3000 dwellings at Yate will not be built within the Core Strategy period, we do not think that the Strategy should be allocating 3000, but if it is determined development should be allocated, and it is determined that the sites which the market have obtained consent on since the Core Strategy was developed should not count, then only the number that can be accommodated within the plan period should be allocated, rather than committing development beyond the plan period. If however it is considered lawful for the plan to be allocating housing beyond the plan period, then we would strongly urge that the whole set of figures for North Yate are set back, so that no housing is built until the major sewage improvements are completed.

5. Problems with Yate location allocation

5.1. The South Gloucestershire Council Cabinet on 6th October 2008, resolved to 'totally object' to the RSS allocation of 3000 houses in Yate citing bad transport links, loss of Green Belt, flooding risks and unacceptable demands on the local infrastructure.

5.2. Nothing has happened since to remove any of those concerns – and nothing is proposed in the Core Strategy to remove key elements e.g. flood risks and astonishingly bad road links.

5.3. For South Gloucestershire to resile from its 2008 position, it needs to demonstrate that the problems it accepted in 2008 have been overcome or that it has a deliverable strategy to overcome them prior to development. We cannot see any evidence for saying the problems have disappeared, indeed the most recent government pronouncements in relation to public transport and highway infrastructure funding make the prospects of significant improvements even more remote, however developer assisted.

5.4. For South Gloucestershire to resile from its 2008 position, it needs to demonstrate that the problems it accepted in 2008 have been overcome. We cannot see any evidence for saying the problems have disappeared, indeed the most recent government pronouncements in relation to public transport and highway infrastructure funding make the prospects of significant improvements even more remote, however developer assisted.

6. Rate of build

6.1. We object to rate of build – which is far higher than our town can handle – and well beyond the ability of local young people to purchase. We note that in the final five years of the period 1800 dwellings are expected, a staggering rate of over 300 a year, higher than was achieved in this town even in the era

of massive growth, when mortgages were plentiful and very high inflation rates made house purchase a highly desirable and affordable investment.

6.2. Those of us who lived through the era of house building rates approaching this level in the 1970s and 80s will recall the massive disruption it caused not just physically but to our social infrastructure as a community. Yate grew from a town of 1000 people to a town of 8000 people, in a 25 year period, and it has taken us from 1988 until now to recover, to establish the community infrastructure a town needs. We are not simply a suburban sprawl, but have managed to establish a community plan, a range of vibrant community groups across all ages, and a willingness amongst residents to contribute via parish council precepts to the provision of a whole range of innovative facilities such as the Armadillo. We are willing to accommodate the 558 new dwellings and feel we can manage that scale of growth, but to add a further 3000 dwellings will force fundamental change in the way our community works and the pressures it faces. Those of us who recall the horrendous documentaries about Yate in the 1970s and 80s and the social problems portrayed know the distance our town has travelled to, for example, achieve Britain in Bloom awards last year. We need development to be at a scale we can handle without pushing us back to those disruptive days. We have worked hard to build a positive image for our town, and do not want it destroyed.

6.3. Approximately half of the town are designated as areas of Priority Social Need, by South Gloucestershire Council – not for general social poverty reasons, but by reason of the needs of young people and the high levels of vulnerability and risk identified in demographic data. Addressing that need has to be the focus of our community cohesion and development work. By adding high rates of build of new residential development which will inevitably require community cohesion and development work you put that most vulnerable cohort.

6.4. So again, this points to the proposals being excessive within the plan period.

## 7. Transport and sustainability of the CS15 allocation at Yate

7.1. Which of the Sustainable Community Strategies are met by development at Yate? These are set out at paragraph 3.23.

It does not

- Promote safer and stronger communities,
- Being healthier
- Modernising health and community care services
- Investing in children and young people
- Valuing the environment
- Maintaining economic prosperity

7.2. The only Sustainable Community Strategy Priority it contributes to is managing future development. At a high level of principle the core strategy key issues are mapped onto the Sustainable Community Strategy, but the

detailed allocations in CS5 and CS15 are not then tested against those priorities.

- 7.3. Section 4, Strategic Objectives has a strategic objective of “responding to climate change and high quality design”. It includes one objective to achieve that as “Using design to create attractive, cohesive, safe and inclusive communities with better integration between housing, jobs, services, public transport and facilities, so that people lead healthier lives and have the opportunity to reduce their CO2 footprint and adapt to the impacts of climate change “. Yet there is no mapping of the carbon footprint of commuting from the possible housing locations to the key employment locations.
- 7.4. This has a particular impact upon the allocation of land at Yate. CS5 could at a conceptual level be implemented in a manner that was sustainable. However CS15 does not implement CS15 and is unsustainable for a host of reasons, including significantly the Carbon footprint resulting from travel to work.
- 7.5. Yate is a trans green belt town and therefore any employment not provided for in the immediate vicinity is automatically several miles away through green belt villages and roads. As such trans green belt communities are the least sustainable locations for development where it is not simply small scale development which can be absorbed into the local employment market. The 558 properties consented since 2008 can be accommodated within the ebb and flow of the local labour market. Large scale development cannot be absorbed in the same way, and the employment allocations do not provide for sufficient additional local jobs. Even if they did, the reality is that increased housing and jobs in location A produces net additional commuter flows, as not everyone can work close to where they live (I work at a University, and until there is a University in Yate I will face a 12 mile commute each day for example).
- 7.6. Yate has no public transport links to all major employment centres within an 8 mile radius except for those adjoining a railway station at Parkway or Abbeywood (MoD) If we look at the major employment locations within an 8 mile radius of Yate: Emersons Green Science and Business parks, UWE/Coldhambour Lane, Hewlett Packard, Parkway MOD, British Aerospace/Rolls Royce, Aztec West and Cribbs Causeway, bus services are very limited
- 7.7. Parkway and Abbeywood have an hourly train service, which is already highly congested during rush hours, with passengers left on platforms unable to return during the evening rush hour because the train is too full to accommodate them (!) Doubling the frequency of trains would increase the capacity to 3.6% of the commuting population. A DOUBLING of the number of trains in the peak would only take 140 people off the road (figure confirmed by First Great Western to our MP) and only serves a limited range of employment destinations.
- 7.8. What about the other 96.4%?

- UWE/Coldhabour Lane is served by the 581 – but that is only one bus an hour daytime – and the route means new neighbourhood residents residents would have to walk over a mile to the bus stop.
- Aztec West and Cribbs Causeway (the latter a major retail centre providing employment for those least likely to own a car) are served by one bus a DAY that gets them to Aztec West or Cribbs Causeway in time for work. And even that service only operates Monday – Friday daytime only so cannot support people working in retail or entertainment at Cribbs Causeway which involves evening and weekend work.
- British Aerospace and Rolls Royce, traditional major employers for Yate residents are not accessible at all by bus. As these companies have diversified the use of their sites, the new employment opportunities are only open to those driving to work.
- Whilst the residential area of Emersons Green does have a bus linking it to Yate, the bus does not stop within a mile of the employment areas at the Science Park and Business park, so users would have a mile to walk along the ring road to work.

7.9. Accordingly, the provision of bus links to work is very limited in the extreme.

7.10. The main centres of employment are more than 4 miles from the town along high speed roads, and not suitable for all but the doubtful cyclist or walker. The significance of the car as the primary mode of access to work is evidenced by the remarkably high level of car ownership, particularly when compared to economic demographics. The cars in many cases may be elderly, but people, whatever their income, are reliant upon that car.

7.11. When we look at the provision for the car, there is no proposal in the plan to address existing issues on the Yate corridor and in Yate, let alone address the additional vehicular traffic.

7.12. The highway network in the Yate area was designed as part of a scheme to provide for a town of some 6000 properties. When Brimsham Park was allocated in 1988, as an additional 900 houses, that took the town beyond the capacity of the highway network. At that point there was provision for dualling the PDR, the Stover Link Road, the building of the Winterbourne Bypass and the provision of a rapid light rail system running through the town to Bristol and the North Fringe. Nonetheless, the Inspector concluded that the town needed a break from development, so infrastructure could catch up. In the 22 years since there NO major change to the highway network inside the town or between the town and centres of employment, the dualling of the PDR, the Stover Link Road, the Winterbourne Bypass and all suggestion of an LRT scheme to Yate have been dropped. In the same period, major employers in the town, such as Newmans, have ceased trading. So, the roads that would need to carry this additional traffic are the road network that

was designed in the 1970s, for a town of some 6000 houses. It desperately needs expansion. None is proposed.

- 7.13. We need specific provision for tackling the growth in traffic in and out of the town. 68.4% of Yate workers drive to work. 46% of Yate workers commute out of Yate mainly to North Fringe and Bristol. If a similar percentage of the occupants of the new houses commute, this means 4000 more cars on our roads during the rush hours. The roads are gridlocked at present, with a 6 mile journey taking an hour or more at peak. We object to the failure to include specific proposals for major road improvements for these extra cars – we simply do not see what can be done to improve the roads, and the vague promise within the document is not enough unless there are specific proposals. Works on the Ring Road do not address congestion at the entrances to Yate or the traffic impacts on Winterbourne / Coalpit Heath.
- 7.14. We also need specific provision for tackling **congestion IN the town** particularly round the shopping centre on a Saturday and rush hour on Station Road. There is no space to improve the roads in the centre of town, so money will not buy a solution for the town centre; the roads in the town centre are at capacity. When one section of Station Road was closed for resurfacing last year, the entire town centre, from the Station to Chipping Sodbury was gridlocked – at 10am!! So, it is not just at peaks that the town grinds to a halt.
- 7.15. Nobody has been able to identify a solution to this traffic problem or to identify how a further 3000 households coming into town can be handled. But the solution CANNOT be to ignore the problem. If there is no solution, then there should be no additional housing. The design and delivery of these in town and commuting highway solutions to be a condition precedent of development
- 7.16. Our town is the largest newly developed town in the UK as far as we can see that does not have a town bypass. So all through traffic on the A432 to the motorways comes right through the town centre, adding to the congestion. The provision of a real bypass is vital.
- 7.17. The result is that whilst the para 6.4 objectives, and even the CS5 vision talk of sustainability, the actual allocation in CS15 delivers 3558 houses in Yate/Sodbury with a net under-provision of employment land associated with those houses, and with no public transport access to most major centres of employment. The result is that a disproportionately high percentage of residents who have to commute out of town to work, will have to do so by car, and they will be taking long journeys through the Green Belt, causing congestion, pollution and significant harm to the quality of life of our Green Belt communities.
- 7.18. Insofar as there is reference to the Yate Chipping Sodbury Transport Package, it is entirely timed in CS30 to the delivery of the new neighbourhood post 2016, and therefore at least the first 558 dwellings

currently being implemented will be built before there is any element of public transport investment. And even when all the houses are delivered there are no proposals for highway improvements.