

# EXAMINATION OF SOUTH GLOUCESTERSHIRE CORE STRATEGY

## **MATTER 8B**

## **DISTRIBUTION OF HOUSING (CS15)**

May 2012

# Hearing Statement

On behalf of Welbeck Strategic Land LLP

Session date 20th June 2012

May 2012

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## **0 INTRODUCTION**

0.1 See Introduction to Matter 8A statement.



# 1 IS THE DISTRIBUTION OF HOUSING PROPOSED IN THE CS CONSISTENT WITH SUSTAINABLE DEVELOPMENT OBJECTIVES?

- 1.1 The CS proposes housing development at Thornbury of 500 net new dwellings over the plan period. We consider that this target is too low and Thornbury should be identified for strategic housing development, providing at least 1,000 dwellings over the period.
- 1.2 The evidence supporting this view is provided in our Planning for Growth Reps, February 2012 Reps Appendix W1 and Matter 7 hearing statement. In short, our case is that:
  - Strategic growth is needed in South Gloucestershire, including to help meet exported demand from other parts of the West of England which are supply-constrained, especially Bristol.
  - Thornbury is a sustainable location for such growth, with unconstrained land around the eastern side of the town, especially at Morton Way South.
  - This land is demonstrably deliverable and in accordance with sustainability principles.
  - New housing at Thornbury will make sustainable use of existing local facilities, some of which are under-used and in danger of decline.
  - Thornbury is located close to the major centres of employment in the Bristol city region.
  - If growth is not directed to Thornbury it will need to be directed to other, more distant, less sustainable locations, where the growth does not want to be in any case, thus resulting in less growth overall.
- 1.3 In a nil migration scenario, where housing meets local need only, we estimate that Thornbury would need 800 new dwellings over the plan period. To provide for in-migration, so it helps meet needs arising elsewhere in the District and the wider housing market area, its provision will need to be significantly higher. This is why we suggest a minimum target of 1,000 dwellings.



## 2 IS THE LEVEL OF ALLOCATION IN EACH OF THE MAIN LOCATIONS BROADLY APPROPRIATE HAVING REGARD TO THE CHARACTER OF THESE PLACES?

- 2.1 As explained in the last section, we consider that the housing allocation for Thornbury is too low and should be increased. This is partly because the town has the capacity to meet strategic housing requirements, and partly because of its own local characteristics and needs. The CS notes that Thornbury's *'town centre and community facilities require investment and improvement'*, and therefore:

*'The Strategy for Development in Thornbury in the period up to 2016 and beyond is therefore to revitalise the town centre and strengthen community facilities and services. The plan for the town centre is to provide for the day to day needs of residents, to make better use of existing employment space and to develop its tourist destination and overall shopping experience.'*

- 2.2 *'To support this and to strengthen the town's community facilities and services'*, the CS proposes development of 500 new homes at Park Farm to the north of the town. In our view, this level of development is too low to produce the benefits that the CS expects. It provides just over half of the 800 homes that we estimate would be needed to meet purely local demand, with no one moving in or out of the town.
- 2.3 Greater housing provision, of 1,000 units or more, would kill two birds with one stone. It would contribute to meeting wider housing needs as explained in the last section and it would help meet local objectives for Thornbury, enabling the town to function as a sustainable community.



## 4 IS THERE ENOUGH FLEXIBILITY IN THE CS TO ALLOW FOR ALTERNATIVE SITES TO COME FORWARD?

4.1 There is no such flexibility in the CS, except with regard to CS15's 'potential housing sites including infill development' – which in effect are windfall sites, because they are not specifically identified in the plan. Subject to this exception, the maximum target of 26,400 new homes over the plan period equals the identified supply, as shown in the CS15 table.

4.2 The lack of flexibility is particularly evident in the CS's supporting text at paragraph 10.7a, relating to the c 4,000 homes proposed at Filton Airfield:

*'Should BAE Systems decide against releasing the Airfield for development, the Council will not seek to compensate with alternative housing provision elsewhere. Rather, the Council may consider... an early review of the Core Strategy to respond to this change in circumstance should it arise.'*

4.3 In other words, if land supply proves too low to meet the CS's housing provision target, the Council will not look for alternative sites to make up the shortfall. Rather, it will reduce the target. Yet again, this illustrates the CS's failure to comply with national policy in the Planning Framework - which requires that housing targets be based on demand and need. South Gloucestershire's target is based on the supply already identified. If this supply falls, the target falls as well. The CS does not worry about how, or where, the need for housing will be met instead.

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