

## **South Gloucestershire Core Strategy - Further Statement**

### **Policy: CS31 North Yate New Neighbourhood**

#### **1. Overview**

This further statement concerns CS31 the North Yate New Neighbourhood (NYNN), and constitutes a response to the Inspector's comments and the National Planning Policy Framework (NPPF).

I believe the NYNN does not meet sustainability criteria as per the revised NPPF. Additionally, I do not believe that sound process has been followed in the Supplementary Housing Paper; specifically, in that significant, non-auditable amendments have been made to the figures. I also believe that the inspector, Paul Crysell, has not taken a completely objective standpoint when reviewing the original CS.

#### **2. Sustainability & the NPPF**

The NYNN is inherently unsustainable for 2 main reasons:

- It's a greenfield development which means countryside will be lost and never replaced - which makes the development unsustainable in the truest sense.
- Realistically, we all know that most people who live in out-of-town housing developments like NYNN commute to work by car - cost and time preclude other options. Of all CS proposed developments, the NYNN is the furthest from central Bristol which means it will generate the most commuting miles and be the most impactful on the environment. The CS Sustainability Appraisal Report (Paras 4.1-4.4; p 226) attempts, weakly, to address these issues; with Yate station cited as a possible commuting solution - but goes on to admit that the NYNN's location does not lend itself to people walking or cycling to Yate station. Even with buses, busy people will not have the time to get a bus from NYNN to Yate station to then travel to Bristol, to then travel from the Bristol station to their workplace.

Both of these key sustainability issues do not fit in with the revised NPPF, specifically:

Para 17 *Core Planning principles* - '*encourage the effective use of land by reusing land (brownfield)*'.  
Para 34 *Promoting sustainable transport* - '*need to travel should be minimised and use of sustainable transport maximised*'. And, Para 37 - '*plans should aim for a balance of land uses so people are encouraged to minimise journey lengths*'.

### 3. Housing Need

The total housing need within the original CS was estimated from highly volatile factors such as economic growth and migration, which are almost impossible to predict accurately. This unpredictably is evidenced by the differences between the housing predictions calculated in the RS and those in the CS. I do not believe that it is a sound process, to take subjective (SHP Para 3.2 admits that '*a judgement has to be made*') data, extrapolate it until 2026 and, in the case of the NYNN use that to justify the loss of a huge area of countryside. However, putting that issue to one side, the original CS calculated an overall housing need of 21500. Following this, the windfall of Filton airfield gave provision for an additional 2500 brownfield houses. The NYNN is the least sustainable proposal within the CS and only justified by a housing need imperative. The windfall of Filton removes that housing need imperative, presenting SGC with the opportunity to shelve the NYNN in favour of sustainable brownfield at Filton. However, during the revision of the CS, the original predicted housing need of 21500 was inflated by 23% (an extra 4900 houses). This increase effectively meant Filton became additional housing provision and the NYNN remained - the validity of this 4900 increase is therefore key to justifying NYNN. To verify the 4900, I have made 3 requests to SGC for supporting calculations for the figure. I have been pointed towards the Supplementary Housing Paper (SHP) which shows which sites have been allocated for flexibility, but I have not been shown any supporting calculation or reasoning for the total number of houses. In my penultimate email, I stated that I would assume the calculations to be arbitrary if no further calculations were produced; and in Patrick Conroy's reply, no further calculations were produced with the justification for the increase being given as: '*to respond to the inspector's concerns about the overall level of housing provision and the ability to demonstrate sufficient flexibility in responding to rapidly changing circumstances*'. If, after pages and pages of analysis (and an independent consultant's report), 23% can be added to the bottom line without auditable reasoning or analysis, what is the purpose of the SHP? Key documents like the CS must be completely transparent and auditable - this does not appear to be the case with the SHP and consequently the CS as a whole. I have already raised concerns about SGC's motives for the NYNN - I believe that, because of the number of years for which the NYNN has been planned, SGC now feel an obligation to not disadvantage their NYNN business partner Heron Land Developments by scrapping the plan at this late stage - bearing in mind the significant plans and investments made. I have put it to SGC that support for Heron has been a factor in the 4900 increase - making it clear that any objective evidence supporting the increase would prove me wrong. SGC refute what I say, but, as already stated they have not produced evidence. I think the EIP must explore the issue of the 4900 houses and demonstrate that the interests of business are not taking priority over those of sustainability. If this sounds a little hysterical, it's worth remembering that in 2007, SGC were the subject of parliamentary questions, concerning their treatment of Cemex - where arguably, they had put the interests of business above those of residents and the environment.

### 4. Lack of Objectivity

I am concerned that a balanced and objective view has not been taken with regard to the NYNN. Paul Crysell challenged the original CS by asking that the RS be considered when calculating housing need. Surely when using data, the most up to date information is that which should be used - global economic and demographic changes have taken place since the RS and not taking those in to account can only be distortive; using this old data, does however justify a far higher housing figure. Also, Paul Crysell asked that the housing figure be increased for flexibility, with a massive 23% now added to the area's needs. Paul Crysell also asked that SGC 'review their green belt boundaries' with a view to development. These mirror a similar situation at Castle Point Council last year where Paul Crysell insisted on increasing

greenfield and green belt housing availability against council wishes. All this to me evidences an emphasis on development over sustainability and a lack of objectivity.