



# South Gloucestershire Council Core Strategy EIP

## Matter 21 – Yate and Chipping Sodbury

### Hearing Statement

May 2012



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## 1.0 Introduction

### 1.1 Background

- 1.1.1 This EIP Hearing Statement is submitted by WYG Planning & Environment on behalf of our client, Bloor Homes Limited.
- 1.1.2 WYG Planning & Environment are promoting a site on behalf of Bloor Homes Limited on land between Iron Acton Way and North Road, Engine Common, Yate.
- 1.1.3 A full planning application has now been submitted by Bloor Homes and its development partner, Sydney Freed (Holdings), on its Engine Common site for a mixed use development comprising 210 new homes, 3243 sq metres of new employment floorspace and a new clubhouse for Yate Town Football Club.

## 2.0 Yate and Chipping Sodbury- The Inspector's Questions

### 2.1 How likely is it that the range of measures in Policy CS30 will address the deficiencies in the Yate/Chipping Sodbury area identified by the Council?

- 2.1.1 The range of measures identified in CS30 will go some way to addressing the deficiencies identified by the Council and additional development will undoubtedly be a key driver in addressing current issues and imbalances. However, some of the measures identified by the Council in Policy CS30 are insufficient or unrealistic and we deal with those issues under the Inspector's remaining questions outlined below.

### 2.2 Is the Council's strategy for development to the north of Yate the most appropriate one?

- 2.2.1 Whilst we have no have no specific objections to the principle of the Council's identification of the site to the north of Yate for a new neighbourhood, we do not consider that the Council's reliance on this single New Neighbourhood in Yate is the most appropriate strategy and we have concerns about the ability of the site to appropriately accommodate the level of development proposed by the Council.





***North Yate New Neighbourhood – Ability to accommodate 3,000 new homes***

- 2.2.2 We have concerns about the ability of the proposed North Yate New Neighbourhood to appropriately accommodate 3000 homes and up to 9 ha of employment land.
- 2.2.3 In previous Core Strategy representations, we have questioned the amount of housing that can be delivered at the North Yate New Neighbourhood given the significant constraints to development from large areas of floodplain and land sterilised by high voltage power lines (notwithstanding other more detailed matters such as landscaping, drainage and ecological mitigation). We previously undertook technical capacity work (attached at Appendix A) to explore the Council's assumptions. We have calculated the gross developable area at North Yate and have then applied a density of 34 dwellings per hectare. 34 dwellings per hectare was the density used in the Council's own Strategic Housing Land Availability Assessment (December 2010) for the site. On the basis of this capacity calculation, a total of only 2,426 new homes could be provided. This is a long way short of the 3000 new home community identified.
- 2.2.4 We were surprised, therefore, when one of the amendments to Policy CS31 that the Council has progressed is reference to the New Neighbourhood being developed at an average density of 45 dwellings per hectare. There is no reasoning given for this density and we believe it is wholly inappropriate for this location. It does not appear to be based on achieving a high quality neighbourhood that fits in with surrounding development, and it does not fit with the delivery of family homes. Indeed, its only rationale is that it ensures, mathematically, that the Council's policy requirement of 3000 homes (which is a significant part of the Council's overall District housing provision) can be calculated.
- 2.2.5 The Inspector will be aware that Barratt Homes has submitted an outline planning application for its site at Peg Hill, Yate (which forms part of the proposed North Yate New Neighbourhood allocation). That application proposes up to 250 homes. This equates to a density of approximately 28 dwellings per hectare. We have also looked at a typical area of existing housing development at Brimsham Park, and have calculated this to have a density of less than 25 dwellings per hectare. This demonstrates clearly that our previous capacity analysis at 34 dwellings per hectare is already well in excess of the existing development at North Brimsham, as well as the density aspirations of one of the proposed new neighbourhood's developers. If a density of 28 dwellings per hectare was adopted for the new neighbourhood, the number of dwellings provided would be 2042- a significant shortfall in the 3,000 dwellings sought.



***North Yate New Neighbourhood: Deliverability***

- 2.2.6 South Gloucestershire has faced and continues to face problems with the timely delivery of large strategic development sites. The allocation of a single large development site to deliver Yate's housing growth could well result in similar delays as the necessary planning permissions are obtained and the required infrastructure is put in place. This is likely to lead to low housing completions in the short term.
- 2.2.7 Given previous problems encountered by South Gloucestershire when delivering large strategic sites, there is a clear benefit in also allocating smaller sites for development which can deliver benefits in the short terms whilst the inevitable issues associated with the development of larger strategic sites, such as the North Yate New Neighbourhood, are ironed out.
- 2.2.8 For these two reasons, we do not consider that the Council's strategy for development to the north of Yate alone is the most appropriate one because substantially fewer houses than the 3,000 houses envisaged are expected to be delivered and those houses will take time to come forward.

**2.3 Is the scale of development envisaged likely to meet local needs or will it encourage more commuting to other centres?**

- 2.3.1 The identification of the North Yate New Neighbourhood will go some way to meeting local needs. In addition, there is a need to identify sufficient sites across South Gloucestershire in order to meet the District's overall housing need and Yate is well placed to accommodate additional housing to make a significant contribution towards that overall housing requirement.
- 2.3.2 However, the site and the scale and range of development proposed on its own, is not sufficient on to meet local needs and, in particular, the level of employment proposed in the new neighbourhood is not commensurate with the level of housing proposed or the wider need for employment in Yate and Chipping Sodbury. Employment will be the key driver in encouraging commuting to other centres and, therefore, without sufficient employment opportunities, the level of out commuting is likely to increase.
- 2.3.3 In addition, the North Yate New Neighbourhood will result in a range of new services and infrastructure that will be of benefit to future residents of the new neighbourhood but of limited benefit in meeting wider local needs.





## **2.4 Do alternative sites in the Yate/Chipping Sodbury area have discernible advantages over the Council's preferred location and, if so, what are these?**

- 2.4.1 Yes, land between Iron Acton Way and North Road, Engine Common provides a site that can deliver benefits in the short term. Whilst that site is not comparable to the scale of the allocation proposed at North Yate, the housing and other benefits from the development can be delivered in the short term and will promote growth and provide greater housing choice in Yate.
- 2.4.2 The site also has economic advantages given its location adjacent to the Great Western Business Park and other existing employment sites to the west of Yate as well as its prominent location adjacent to Iron Acton Way. We deal with the economic benefits of the site in more detail under the Inspector's question 'Is the Council's approach to employment provision in Yate/Chipping Sodbury sound?'.

## **2.5 Is there sufficient flexibility in the proposals to cope with changing circumstances?**

- 2.5.1 No, the Council's policy for Yate and Chipping Sodbury generally relies in one large strategic site coming forward.
- 2.5.2 Previous experience in South Gloucestershire shows that such sites will take time to be delivered and, if that delivery were to be significantly delayed, then there is no flexibility within the current Core Strategy for other appropriate and sustainable sites to come forward.

## **2.6 Is the Council's approach to employment provision in Yate/Chipping Sodbury sound?**

- 2.6.1 No. The Council's employment strategy in Yate relies on redevelopment opportunities within existing employment areas and the allocation of up to 9ha of employment within the North Yate New Neighbourhood.
- 2.6.2 The Council's evidence base for its employment strategy is provided by the Council's Employment Land Review (June 2010). That review confirms that Yate has been relatively successful in maintaining a strong economic base with a steady take up of employment land which is now exhausted. Opportunities are generally limited to re-use of existing sites which become vacant and



these tend to be small and set within the context of estates of industrial and generally tired character. Yate is increasingly falling short of modern requirements which are being offered elsewhere.

2.6.3 The Employment Land Review also sets out a number of employment aims in Yate as follows:

- To widen the employment base/maximise diversity in types of jobs and dilute concentration of blue collar jobs;
- To aid sustainability of the towns, some more development should be accommodated, particularly to attract more opportunities for employment growth.
- To achieve a better balance between jobs and housing.

2.6.4 As part of the planning application package that has been submitted on land between Iron Acton Way and Dyers Lane, Engine Common, an employment report has also been produced by Jones Land La'Salle (JLL).

2.6.5 That report identifies that in the period when land was available during the 1990's and early 2000 in Yate, employment land take up was over 2 hectares (4.94 acres) per annum based on a total take up of 30 hectares (74.1 acres) of allocated employment land over a 13 year period. Based on this historic take-up, likely pent up demand due to limited availability of new employment land during the last decade suggests that, even with some recycled developed land, the provision of 9 ha as part of the North Yate New neighbourhood is insufficient. Based on historic take-up alone and by extrapolating those take-up rates from 2012-2026, over 28ha of land would be required. Whilst that level of employment provision is unlikely, it nevertheless demonstrates the need for considerably more employment land to be allocated.

2.6.6 In addition, an employment allocation within the North Yate New Neighbourhood is not expected to be a desirable location for employers as it is located off the main road network, away from existing employment and requires travel through large areas of existing residential development. We note that Heron Land, in its previous representations on the Council's Core Strategy, has sought to reduce the level of employment allocation to only 5ha. We also note that as a result of those representations, the Council amended Core Strategy policy CS31 from a provision of a minimum of 9 ha of employment land to up to 9 ha of employment land. This suggests that a reduction from 9 ha will be accepted by the Council and this may also suggest as little as 5 ha, as advocated by the developer, will be accepted. In our view, this sought reduction on the part of Heron is based on the



likely desirability of employment in that new community rather than a reflection of the actual level of employment demand in Yate and Chipping Sodbury as a whole.

- 2.6.7 In terms of the Council's Strategy of redeveloping existing employment areas, whilst in the past there has been some recycling of second hand sites to supplement new provision, recent evidence would suggest that unless these sites can be redeveloped for a higher value alternative use there is often too much value in the existing structure for redevelopment for employment use.
- 2.6.8 The Council's employment strategy is also flawed in respect of its ability to achieve the aim of widening the employment base through, in particular, an increase in the number of office related job opportunities in Yate and Chipping Sodbury. Office occupiers require prominence and visibility and the redevelopment of existing units within existing industrial estates are unlikely to provide the sites and the surrounding environment that would be attractive to office occupiers.
- 2.6.9 Furthermore, to achieve the desired shift towards greater office job creation, it is our view that the focus should be on expanding existing established employment areas rather than seeking to create new employment destinations which, in our view, will meet market resistance.
- 2.6.10 Overall, the Council's current approach to employment provision in Yate and Chipping Sodbury is 'unsound'. To meet employment requirements and provide a greater balance between housing and jobs, there is a need to identify further employment sites in the Yate and Chipping Sodbury area. However, these sites must be in the right location to be attractive to potential employers and particularly the office sector.
- 2.6.11 Our client's site at Engine Common proposes 1,329 sq metres (14,300 sq ft) of office floor space (Class B1) and 1,914 sq metres (20,600 sq ft) of Class B1c and/or Class B8 employment floorspace. The proposed employment development is anticipated to create an additional 130 jobs.
- 2.6.12 The scale and mix of employment floorspace has been progressed following advice from Jones Lang LaSalle (JLL). The proposed employment development will be located immediately adjacent to Iron Acton Way, one of the main arterial routes into Yate, and is positioned adjacent to the Great Western Business Park and the other employment area beyond that to the south.
- 2.6.13 The development will provide a prominent frontage location that is a key requirement of many employers seeking office floorspace. It will provide attractive and flexible floorspace and will make a significant contribution to meeting the Council's employment aspirations for Yate and Chipping Sodbury.



2.6.14 The development would complement rather than prejudice the Council's employment strategy for the area and the NPPF states that local planning authorities should respond positively to wider opportunities for growth and the application site provides an appropriate location for additional and attractive employment growth in the Yate and Chipping Sodbury area.





### 3.0 Conclusions

- 3.1.1 On the Matter of Yate and Chipping Sodbury and particularly Core Strategy policies CS30 and CS31, amendments are necessary in order to ensure that the Core Strategy is 'Sound'.
- 3.1.2 Policy CS30 and CS31 place an overreliance on a single location to deliver the housing and employment needs of Yate and Chipping Sodbury. There are concerns about the level of housing that can be appropriate achieved from North Yate New Neighbourhood and, undoubtedly, that new community will take time to come forward.
- 3.1.3 In addition, the Council's employment strategy for the area is considered to be 'unsound'. The Core Strategy proposes an insufficient quantum of employment floorspace and in the wrong location. The Council's reliance on the redevelopment of existing employment sites is also considered to be unrealistic and does not provide a sound basis for meeting the employment needs of the area.
- 3.1.4 To address this problem and to ensure that the Council's Core Strategy is 'Sound' and in accordance with the NPPF's requirement of meeting objectively assessed housing and employment needs, particularly in the short term, additional sites must be identified and imbedded within Policy CS30 and CS31.
- 3.1.5 Bloor Homes has recently submitted a full planning application for a mixed use development of 210 new homes and 3243 sq metres of new employment floorspace (on approximately 2ha of employment land) on land between Iron Acton Way and North Road, at Engine Common, Yate. The submission of that application demonstrates that the site is suitable and available for development and is one such site that can provide housing and employment in the short term to meet employment and housing need in Yate and Chipping Sodbury.



## Appendices



# **Appendix A – Assessment of Housing Capacity within the North Yate New Neighbourhood**

