

## South Gloucestershire Council Core Strategy, additional hearing by the Inspector referring to additional housing sites identified by the Council

I wish to make some comments triggered by the additional site identified by the Council at Thornbury in order to satisfy the potential demand by the Inspector for additional housing in the County in order to meet potential additional housing 'targets' set by him and to make some additional general comments.

1 I am asking for clarification of the right of the Inspector to impose any kind of housing target on a Council. This has been mentioned before in my previous correspondence on the Core Strategy. I am led to understand that this mandate was removed by Central Government in 2010. I believe the original figure of 21000 dwellings set by the Council should not be altered by him as I understand that it is now purely a local Council decision. If this is indeed the case then there is no current need to identify additional land at this late stage if the Council's original estimate was adhered to. Also, in the early stages of formulating the Core Strategy there was a further requirement to increase on this figure which led to inclusion of the parcels of Green Belt land south of the M4, west of the A4018 and west of the M32 which I oppose their inclusion.

2 I welcome the Council's **new position** that to meet the potential housing 'target' demand by the Inspector there is no more land is available south of the M4. I have already pointed this out in earlier submissions that eventually the future needs (beyond the Core Strategy period) would have to be found elsewhere in the County. However this change of stance by the Council does show their whole approach to the formulation of the Core Strategy in the first place is unsustainable in its current form. To seek to fundamentally amend their original submission at this late stage by being forced to look outside the Northern Fringe (south of the M4) leads me to be very critical of the soundness and sustainability of their approach to the Process since the start. In view of this late addition I question whether there is adequate room for flexibility and resilience to cater for any future changes. I would have preferred the saturated development of all the land currently proposed (mainly to the south of the M4) be addressed before the Core Strategy is signed off and the issue of 'what next' be agreed upon.

I want to further point out that this is not the first addition during the Process. I understand that the Inspector required additional housing numbers early on in the Process as well. I also refer to the (controversial) '**Position Statement**' regarding Filton Airfield where only a few months before, it was regarded as a 'protected and strategic asset. Housing figures set by the Council would not have required it's inclusion. This changed by the requirement by the Inspector to add more housing. Fortunately for the Council, the closure of the airfield was in fact already being negotiated behind the scenes between Council and the landowner for inclusion, so the addition windfall land was 'just' able to cope with the additional demand within the Northern Fringe belt. The timing of the additional housing and the sudden availability of the airfield to meet this demand is regarded by many as contentious and shouldn't have been allowed. It reinforces my existing belief (through this late change and the Position Statement) and my serious concern that the whole process is open to abuse and largely negates the purpose of any Strategy at all. I am calling on the Inspector to review these issues and the constant refusal to consider spreading the 'load' further afield now rather than defer the inevitable until post 2027. I would prefer some of the proposed land in the Northern Fringe to be excluded for now until the economic climate changes and for a new look at the issue of spreading the load more evenly across the County before it is strictly needed. In my view the '**Position Statement**' regarding the airfield was wrong and should be taken out of the Strategy altogether now, as well as a moratorium placed on development of the 'windfall' site at Filton Airfield pending a Review of the process that led up to it's inclusion and its strategic continued use as an airfield. In my opinion, it is a far too important national and Regional asset to be absorbed into the Core Strategy. I would therefore call on the Inspector to recognise the benefits of not putting housing all in one small area of the County (**the Northern Fringe**) and to look afresh at additional land-sited elsewhere in the County.

In my opinion, to encourage 'organic' growth in a completely new and existing smaller communities elsewhere in the County is a far better 'green' and sustainable method of providing the anticipated demand for new housing. I therefore endorse the use of the additional parcel of land at Thornbury only as an initial move towards achieving the better distribution of dwellings across the County, not to increase the overall number of dwellings required in the County as a whole.

I would further like to invite the Inspector to agree to reducing the total numbers of housing back to at least the 21,000 that the Council itself proposed in its original Core Strategy or better still, recommend the base data is reviewed before committing to an ultimate figure I believe there is a strong case to reduce this number even further (due to the economic uncertainty and other changes since the original target was set

Thank you

David Roake

