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(Submitted via email: [programme.officer@southglos.gov.uk](mailto:programme.officer@southglos.gov.uk))

8<sup>th</sup> February 2013

Dear Mr Crysell

**Re: South Gloucestershire - Local Plan: Core Strategy (Additional Housing Sites)**

These representations are made in addition to an earlier submission relating to the draft main modifications Core Strategy. These representations relate specifically to the two areas of concern which the Inspector wishes to consider at the additional hearing session, rather than reiterating comments made within the previous representations.

In relation to the relative merits of various sites proposed through the Core Strategy Gladman believe that in addition to the Sustainable Urban Extensions (SUEs) the Council should be looking towards small and medium sized sites which do not require the same level of infrastructure and would therefore be more deliverable within the short term. This would assist in meeting the housing need and previous shortfall in the immediate future, working towards the government's objective to 'significantly boost the supply of housing'.

As further residential development is needed outside of these SUEs consideration needs to be given to further growth being directed to the smaller yet still sustainable settlements to help the Council deliver their "objectively assessed needs for market and affordable housing" (NPPF\$47). Paragraph 17 of the NPPF Core principle 11 outlines that planning should: "*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*" This makes clear that if a residential development and its associated community benefits can enhance the sustainability of a settlement then this, in the appropriate circumstances, is an acceptable, indeed necessary approach to take in distributing housing growth.

Gladman believe that a number of the settlements within South Gloucestershire will struggle to take the level of housing growth expected of them; these areas (including the fringes of Bristol, Yate and Thornbury) already anticipate taking a significant level of new houses through SUEs. The District is heavily constrained by flood risk to the western fringes, Green Belt and areas designated as AONB. These constraints lead Gladman to conclude that the Council should consider the smaller yet still sustainable settlements (such as Charfield) to help deliver overall strategic housing requirement. Long-term aspirations are in place to reopen Charfield railway station allowing direct commuter access to Bristol, Cheltenham and Gloucester, and in so doing, enhancing the sustainability of the location. Furthermore, development in such locations should be seen as a positive approach in helping to reinforce and maintain existing services and facilities in the smaller settlements and rural areas.

In relation to the additional 594 dwellings that the Council has identified as potentially deliverable within the first five years of the plan period, Gladman raise significant concerns. Firstly Gladman believe that a number of these sites are arguably not 'deliverable' in relation to the requirement set out in footnote 11 of paragraph 47 of the NPPF: *"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years..."*

Gladman are unclear as to whether a detailed assessment has been undertaken and the required consideration been given to the sites that the Council has moved forward into the five year period. Gladman query whether this exercise has been completed appropriately or sites have arbitrarily just been moved forward to meet the request of the Inspector. There is still a degree of vagueness and uncertainty in relation to these additional units which have been added to the five year supply.

In relation to the North Yate new neighbourhood, identified by the Council to provide 240 units of the additional 594 units, Gladman believe that it is unrealistic to expect all 240 units to be delivered in this period, particularly as planning has not yet been granted for this development.

Currently there is only permission for 250 dwellings at the North Yate new neighbourhood. Although it is noted that the phasing of this scheme has been reviewed, it seems extremely ambitious to expect a further 240 dwellings plus a further 250 dwellings at the Peg Hill site at North Yate within the five year period to be completed. Exacerbating the issue is the fact the delivery of sites such as North Yate and Cribbs/Patchway new neighbourhoods relies upon the delivery of major new strategic infrastructure. Footnote 11 of the NPPf states that *'to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.'*

It is questionable as to how many of the 594 additional units identified by the Council and brought forward into the five year period are deliverable and fit the aforementioned criteria of NPPF Footnote 11. Of the 594, only 126 have planning permission and signed Section 106 Agreements. There are still elements of uncertainty as to whether the remaining 468 units will be deliverable within five years such as pending Section 106 Agreements and sites that have failed to deliver in the past even with the benefit of planning permission.

Gladman also highlight the fact that even with the 594 units that South Gloucestershire are proposing the Council have not met the 852 shortfall resulting from the Inspectors main

modifications (falling short by 260), therefore the Council are not able to demonstrate the required supply of housing land.

In conclusion Gladman believe that despite these additional sites proposed by the Council, the Core Strategy should not be found sound. Uncertainties around deliverability still remain (in relation to both these additional 594 units and also some of the sites included in the initial five year housing land supply) which will impact of the implementation of the plan as a whole. Gladman reiterate that the emphasis should be on delivering new housing now to significantly boost the supply and that this will only be achieved through the adoption of a sound Local Plan. Through the submitted proposals in the Core Strategy and the identified housing land supply, housing need will not be adequately addressed in South Gloucestershire.

I hope that you have found these additional representations constructive. If you require any further information or wish to meet with one of the Gladman team then please do not hesitate to contact me.

Yours Sincerely,

A black rectangular redaction box covers the signature area. There are faint blue ink marks on either side of the box, possibly remnants of a signature or initials.

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