

Do you support the process, as set out in section 10 of the Topic Paper, used to select sites which are currently included in the Emerging Spatial Strategy?

It is hard to conclude that the process for selecting sites as set out in section 10 of the Topic Paper has produced results that are in the best interest of residents of South Gloucestershire. The local plan is meant to provide a positive vision for the future of South Gloucestershire; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings (National Planning Policy Framework ch. 3:p15). That means everyone, all communities and all residents. Despite the best efforts to convince the public that all sites have been assessed equally against a framework of HELAA, lens allocations, emerging preference strategy assessments and subsequent re-assessment (as detailed in Appendix 1A site assessment spreadsheet), the whole emerging strategy is based on unbalanced and biased results as it is premised on the urban expansion of greater Bristol and the requirement for major substantive development of the green belt along the East Fringe and to a lesser extent the Northern Fringe.

The council claims its first priority is to meet its own district's housing needs and its ongoing rhetoric claims this local plan is about providing residents with affordable and secure homes and access to employment, facilities and services against the background and challenges of climate change. Yet all the language within this new local plan whether intentional or inadvertent, is promoting the expansion of greater Bristol which actually risks disadvantaging many South Gloucestershire residents. What follows suggests that despite attempts to make the assessment process of sites appear obvious and transparent, indicates that the emerging strategy and urban focus on the extension of the East Fringe of greater Bristol and to a lesser extent the Northern Fringe, has influenced and skewed the selection of sites at every stage of evaluation. In the absence of evidence to the contrary it is difficult not to conclude that the whole process is flawed as it lacks a transparent, consistent strategic approach to ensuring that every site was dealt with equitably and consistently to achieve balanced conclusions and that each site was included purely on merit rather than in keeping with a plan for urban expansion.

The initial HELAA appear factual and consistently applied. Sites were considered against lens criteria. Detailed Sustainability Assessments were undertaken but this is where the process becomes opaque. There are no guides to show whether weightings were applied for each of the 27 elements identified. In many cases it is impossible to determine why sites that failed on multiple sustainability elements were selected whereas others deemed more sustainable were not. Immediately this raises questions about whether the sustainability information has any actual impact on the site evaluations as many selected sites will damage rather than contribute to and enhance the natural and local environment (NPPF 180) and are likely to contribute to rather than mitigate climate breakdown and bio-diversity loss. This brings into question whether South Gloucestershire council's actual commitment to addressing the climate and nature emergencies had any impact.

While the section *Reg 18 Local Plan Phase 3 Consultation Emerging Preferred Strategy (Topic Paper Paragraph 10.12 - 10.14)* match sites to criteria for infrastructure, services etc, decisions start to become highly subjective in nature rather than evidence-based or factual criteria for consistent and structured examination. A quick example of two blank greenfield sites where SG055 is deemed a commuter town without any evidence to show public transport would not be possible or commercially viable while SG868 does the opposite and assumes public transport will automatically be commercially viable and extend beyond the

local area to the northern fringes and Severnside. To ensure fair treatment of every site, evaluations should be evidence based.

Similar inconsistencies appear throughout the evaluations. Further examples having looked across multiple sites - both rejected and included – demonstrate clear patterns indicating the differing treatment of sites along key transport routes including A38, A432 and A4174.

Schools

Data has been produced on primary school capacity yet restrictions have been applied differently. For example:

- Winterbourne produced many sites along B4058 which were considered developable or deliverable in the plan period and required no major new infrastructure. Yet overall development is restricted to 235 due to limited primary school places. Sites appears to have been selected to reflect these number - SG437 (70), SG446 (20) & SG762 (145) = 235.
- Likewise, Frampton Cotterell/Coalpit Heath have many sites considered developable or deliverable in the plan period and requiring no major new infrastructure. Again, development was restricted to 60 due to limited primary school places. In this case sites SG380 (60) & SG107 (90) for 150 homes were selected, some 2.5 times over capacity. It is interesting that as both are large conurbations with the potential for further sustainable development that with growing housing demands it was not thought prudent to even consider of the potential for combined developer contributions to enable school capacity to increase.
- At the other extreme 2 small villages - Cromhall and Rangeworthy which both have capacity needs to limit housing to 30 have 6 sites for 152 homes in Cromhall and 5 sites for 212 homes in Rangeworthy respectively included in the emerging strategy. If school capacity is unlikely to change why cause unnecessary stress to the communities?
- In contrast, a completely different approach was adopted along the Eastern fringe where decisions on green belt sites with no existing facilities appear based on aspirations not fact simply because sites are adjacent to A4174 and/or A420. These include SG209, SG346, SG868, SG459 and SG897. Despite these sites providing 5800 homes, there is no assessment of whether local schools have capacity just an assumption that new schools will be built on these large sites. Experience at Lyde Green should have highlighted the difficulties and protracted timescales to procure schools. The new secondary school in Lyde Green will not open until 2026/27 and even the Education Infrastructure Position Statement Topic Paper highlights the uncertainty around capacity beyond the Lyde Green development. Interestingly planned Secondary education expansion is due at Abbeywood & Brimsham Green – both areas where there is no development proposed in the local plan.

Roads and traffic

South Gloucestershire's 2023 Monitoring Report shows existing infrastructure is already at or near capacity and will require new investment if developments are to be sustainable. Evidence shows high rates of car use by South Gloucestershire residents to commute with only 3% using public transport, 2% cycling and 5.7% walking. It is already known that air pollution including NO₂, and particulates PM_{2.5} & PM₁₀ is an ongoing problem across the county and while levels meet UK standards, they exceed World Health Organisation (WHO) target levels and continue to pose a threat to health. Yet despite this mass of evidence showing county-wide road congestion is growing, depending on the road and highway

capacity issues in question, recorded evaluation decisions differ and appear subjectively selective.

Small discrepancies appear in two Coalpit Heath sites where SG068 for 1317 homes was deemed not suitable with constant reference to adding to traffic congestion on A432 corridor and negative impact on public transport while SG107 for 90 homes was deemed suitable yet although it feeds onto A432 there is no mention of adding to traffic congestion on this road corridor and the negative impact on public transport.

In the Yate area despite being located on the B4058 with access to services and public transport SG382 Engine Common for 594 homes was deemed not suitable in part due to its impact on A432. The site is not on the A432 and any commuter route to M32/M5/Bristol would be on B4058 via Winterbourne (where there is no reference to roads or congestion in the sites selected). In contrast SG100 Badminton Road Yate for 650 homes is sited very close to the new park and ride and dedicated cycle lane for active travel along the A432. With access to services and public transport including rail, the site was deemed unsuitable due to the additional demand on the 'heavily congested' A432. Furthermore, it claimed services/facilities were not walkable despite meeting statutory walking distances for schools with Culverhill and Abbotwood schools 1.5 miles away (2 miles at primary and 3 miles at secondary) and the town centre approx. 1.9 miles, the same distance as Ladden Garden village which is deemed 'walkable'.

At Chipping Sodbury SG108 for 207 homes failed on the grounds that *it was not a reasonable walking access to services and facilities including education and there was no public transport*. Yet the site is adjacent to a dedicated flat cycle/walking path along the Wickwar Road and 1.4 miles from Chipping Sodbury with its range of services and 1.4 miles from Brimsham Green school.

Development around A38/M5 Junction 14 area

From the outset it was argued that issues with Junction 14 of the M5 prevented major development around the Thornbury/Buckover area and restricted development in the wider Charfield area further necessitating the use of green belt land. Yet according to Stroud District Local Plan *Examination Pause Short Report July 2024*, South Gloucestershire Council is working collaboratively with Stroud District Council, Gloucestershire County Council, National Highways and others in support of Stroud's Local Plan. Not only is South Gloucestershire Council collaborating on their M5 Junction 14 Project, it is actively involved in the M5 J14 Interim Scheme to provide an interim traffic mitigation scheme associated with the 1000 new homes planned for Sharpness Vale. This raises questions over why the council is willing to support works and/or upgrades which will allow another district to build, but it prevents South Gloucestershire from doing so. Surely this council has a duty to ensure appropriate suitable development in this part of South Gloucestershire which will provide the needed housing and economic benefit the area needs before it considers sacrificing green belt.

Other examples of inconsistencies include greenfield sites SG055 at Falfield for 1220 homes and SG115 Buckover for 3000. Both are undeveloped sites on the major A38 (4.3 mile and 2.3 miles from Thornbury respectively), and each will have easy access to the new Charfield train station. Both require major infrastructure investment but the recorded decisions to reject the sites include highly subjective reasons for rejection without evidence to support the suggestions that these sites would be less able to develop sustainably than others even

when they are close to A38, a major A-road, M5 motorway and train station. Economies of scale could easily make them an attractive proposition for public transport.

This is in direct contrast the sites with similar constraint and no infrastructure along the eastern fringe A4174/A420 where without any guarantees infrastructure to service these sites can be delivered, sites have been selected based on wishful thinking . SG459, SG868 & SG897 state 'development of these site will significantly increase highway flows along the A4174 and wider local road network and solutions will be required to mitigate these'. There are no solutions provided yet the sites are included. Despite proposals for over 5000 homes along the A4174 and A420, the disproportionate negative impacts of increased traffic congestion along the eastern fringe are simply dismissed as is the fact that pressure on the already overloaded A4174 will further exacerbate the existing challenges of getting to Parkway station and the northern fringe.

At the other extreme, smaller sites in the same area at SG209 & SG346 make no mention of roads despite feeding onto the A4174.

Park and Rides and local employment options based on claims the East Fringe of Bristol has a 'homes-to-jobs' imbalance is envisaged as the solution to traffic congestion. However, access profiles (DAPs) show low numbers of residents actually live and work in the same place even in areas with multiple employment and if patterns of low-level usage of park and rides such as at Yate are repeated not only will it undermine the viability of proposed park and ride sites along the eastern fringe, it will substantially add more traffic. As Jacobs *A4174 Junction Improvements Public Consultation Report* noted the A4174 was designed to accommodate longer distance car journeys and is important for 'necessary strategic car trips'. Add delays and traffic will simply reroute through local communities.

It is argued that the purpose of the chosen methodology is to select the best sites to address housing needs. Yet many of the identified green field sites are in fact green belt and as CPRE's *State of the Green Belt* (2018) report demonstrates, building on the green belt does not lead to an increase in affordable homes. Figures from 87 authorities show less than 22% of housing units on green belt sites are affordable compared with the average target of 31% set out in local plans. While the Government claims half of all green belt development must be affordable, the exploitable "subject to viability" loophole remains and as building in the green belt is costly, evidence suggests developers to will continue to exploit this and most schemes will be unlikely to comply¹.

Building more homes alone does not significantly reduced prices, increased construction rates are also needed and this is not happening. With this plan supporting large amounts of new building in the green belt which it is known will result in fewer homes being built per acre, overwhelmingly the homes are likely to be expensive four- to five-bedroom and prices on average 20% more than equivalents elsewhere. When 'affordable' housing can cost anything up to 80% of market value, how will these levels benefit the very people it is claimed the local plan will help who currently live in poor housing or with unstable tenancies?

The overall impression is the eastern fringe development is being driven by profit-hungry developers at the expense of local people and the planet, which appears contradictory as

¹ <https://www.theguardian.com/commentisfree/article/2024/sep/10/countryside-ministers-threat-pristine-green-belt-land>

South Gloucestershire Council has declared a climate emergency. Concentrating so much housing along the eastern fringe is likely to impact flooding, damage critical carbon storage, and impact the ability for the land to alleviate the urban heat island effects through shading/cooling, impact air quality improvements and destroy safe havens for vulnerable species. At the same time the remaining 22% of development (1755 homes) is widely spread across 18 smaller villages.

The section process has not provided each community with the homes they desperately need, rather as has been demonstrated, the selected sites will worsen the situation, with high cost homes which are likely to attract people from beyond to the county. Market towns such as Yate/Chipping Sodbury and Thornbury appear excluded but the decisions lack valid and considered reasons why they are avoiding further development beyond claims that they “have played a key role in delivering the new homes over the last 5 years”. These towns have the same housing needs as other areas and have also benefited the most from substantial investment in infrastructure and access to services yet only 1% of development will occur here. This raises concerns that in the absence of logical reasoning, this is a purely political decision to avoid and unfairly protect certain areas and sites. This increases the feeling that evaluation outcomes have been too often based on arbitrary decision making with the aim of manipulating a green belt review which can then be used to justify the development of the eastern fringe green belt. While some small-scale green belt development throughout this area may be warranted or even preferable, according to the Local Government Association (LGA) *Independent Group briefing on NPPF Consultation August 2024*², proposing such large eastern fringe incursion into the green belt with 56% of all new development (further 21% development in the northern fringe) which will fundamentally undermine its function to prevent urban sprawl, prevent coalescence of towns or distinct areas and prevent encroachment on the countryside should not be supported. This proposed loss of green belt will allow the main urban area sprawl to creep inexorably towards joining places such as Winterbourne, Coalpit Heath, Yate and Pucklechurch. This should be of great concern to South Gloucestershire residents. It undermines the fundamental purpose of the Green Belt specifically in an area deemed to be checking urban sprawl, especially when the Government’s proposed changes do not support the release of land where doing so would undermine the function of the Green Belt across the area of the plan as a whole.

Do you have any comments on the provision of additional supply to ensure greater flexibility to meet South Gloucestershire’s housing needs, as set out in section 11 of the Topic Paper?

The same methodology will produce results with all the flaws identified above.

Do you have any comments on the Council’s approach to considering whether it can assist with Bristol City Council’s unmet housing need, as set out in section 12 of the Topic Paper?

Housing needs are fluid and have no boundaries so it is actually impossible for South Gloucestershire council to claim it cannot assist Bristol with its unmet need. It has no control over who buys houses. However, the very choice of language and tone used

² <https://www.local.gov.uk/lga-independent/our-work/publications-independent-group/lga-independent-group-briefing-nppf>

throughout the local plan and its constantly inward focus toward Bristol and its proposal that 77% of all the proposed developments are concentrated along the urban fringes gives a strong impression that this is a plan for the expansion of Greater Bristol not a local plan for South Gloucestershire where a more sustainable approach would be to serve local people's housing needs more fairly across the whole county. There is no doubt this plan will indirectly but positively assist Bristol with its housing needs.

To say this plan is to meet the needs of the whole population of South Gloucestershire and doesn't contribute to Bristol is disingenuous. As has already been noted, pressure on affordable housing is cross-county with the council admitting the county has shrinking households with less people in each home and a population that is both growing and aging. Yet the council has actively chosen to exclude development in and around its main towns of Thornbury, Yate and Chipping Sodbury who combined site allocations have a mere 75 homes proposed without evidencing how those starting out, looking to downsize or developing new blended families will be able to find a suitable home to live in if they wish to remain in these areas.

What is planned is that along the eastern fringe alone the local plan intends to sacrifice green belt to provide 38% of all its housing needs on the basis that developers will cough up and provide all the infrastructure, services and facilities to support the housing, from local centres, education facilities, park and rides to new recreation, open space and green infrastructure and provide extensive affordable housing. The reality is infrastructure costs alone will inevitably lead to invoking the "subject to viability" loophole to reduce affordable housing.

No regard has been given to the close-knit existing communities near these sites who will be consumed or impoverished by the sheer scale of developments and loss of green belt. The fact that green belt developments produce less numbers of houses and attract price premiums means housing at these locations will be beyond the financial reach of residents on average wages or who currently live in poor housing or unstable tenancies, the very people with housing needs that this plan is meant to address. This expansion of greater Bristol into the green belt is not only a developers' dream but will be hugely attractive to urbanite Bristolians wishing a more rural location or anyone with deep pockets able to afford the premium prices.