

South Glos New Local Plan Consultation – Issues in a nutshell

- South Gloucestershire Council is failing in its duty to take the draft Joint Spatial Plan (JSP) for the West of England and convert this into a local authority based plan to show how, where and when this housing will be delivered, and more importantly what infrastructure will need to be in place in order to deliver it. This is a lightweight document that performs none of these functions.
- This document is in any case premature, in that the JSP has yet to undergo its Examination in Public, and we cannot yet know what will be included. By the same token the document seeks to prepare the ground for an overlapping process of approval for Buckover prior to adoption of the Local Plan.
- The JSP uses the Strategic Housing Market Assessment (SHMA) as the basis for its forecast demand. Onto this is added a “market adjustment” (to tilt the balance in favour of supply) to derive an Objectively Assessed Need (OAN) of 97,600 houses for the West of England overall. This compares with a planned build of 105,500, giving a margin for error of 8%. This build is then allocated to each of the four Authorities, of which South Gloucestershire gets 32,500. However, the SHMA forecast is prepared on a local authority basis, so we can compare this allocated build target with an OAN for South Gloucestershire of 24,000. **This gives an astonishing margin of a 35% excess build over forecast need.**
- We cannot tell if this outrageous excess is because our authority has negotiated poorly, or simply desires to create an artificially high requirement to justify vanity projects such as Buckover. This excess build will have consequences for all of us; it means we lose more greenfield space than we need to, absorb more strain on the infrastructure than is necessary, and endure more congestion and pollution than we should. It will also make it much more likely that this authority is perpetually below target in its rate of build (the so-called five-year land supply rule) which gives open season for developers to build anywhere they like. The Local Plan has no choice but to take the allocated build within the JSP, but **this authority should come clean and explain why it has volunteered to take so many more houses than the forecast demand suggests.**
- This document is long on describing the challenges that South Gloucestershire faces (congestion and pollution through high levels of commuting; failure of infrastructure to keep pace with development etc), but then offers no explanation as to why the spatial strategy proposed (creating a separation between where people live and where they work) will do precisely the opposite of alleviating these problems.
- South Gloucestershire has a commitment to achieve specified reductions in the level of CO2 emissions which this spatial policy will all but guarantee to cause the authority to miss. This is a wilful neglect of duty which may also be illegal.
- South Gloucestershire is alone in the four authorities in not specifying which transport infrastructure projects are a prerequisite for the specified Strategic Development Locations to go ahead. In particular we hear rumours that the Metrobus will not be extending north to Thornbury and the proposed Buckover site. This authority has a statutory duty to explain what transport and infrastructure it proposes and how this will be funded, which it is clearly failing to do, and to guarantee that these developments will only be allowed if the infrastructure is built first.