

TRAPP'D Summary of the New Local Plan phase 3 consultation

1: South Glos New Local Plan is out for consultation

The Council's 'preferred strategy' gives Thornbury something of a break from further large-scale greenfield development, but the risk of having to take Bristol's unmet need looms large.

The consultation programme for Phase 3 of South Gloucestershire Council's New Local Plan will run for 9 weeks from 6th December until 7th February 2024. You can view the [consultation document here](#) and submit your own comments on the housing plan for the 15 years from 2025 to 2040.

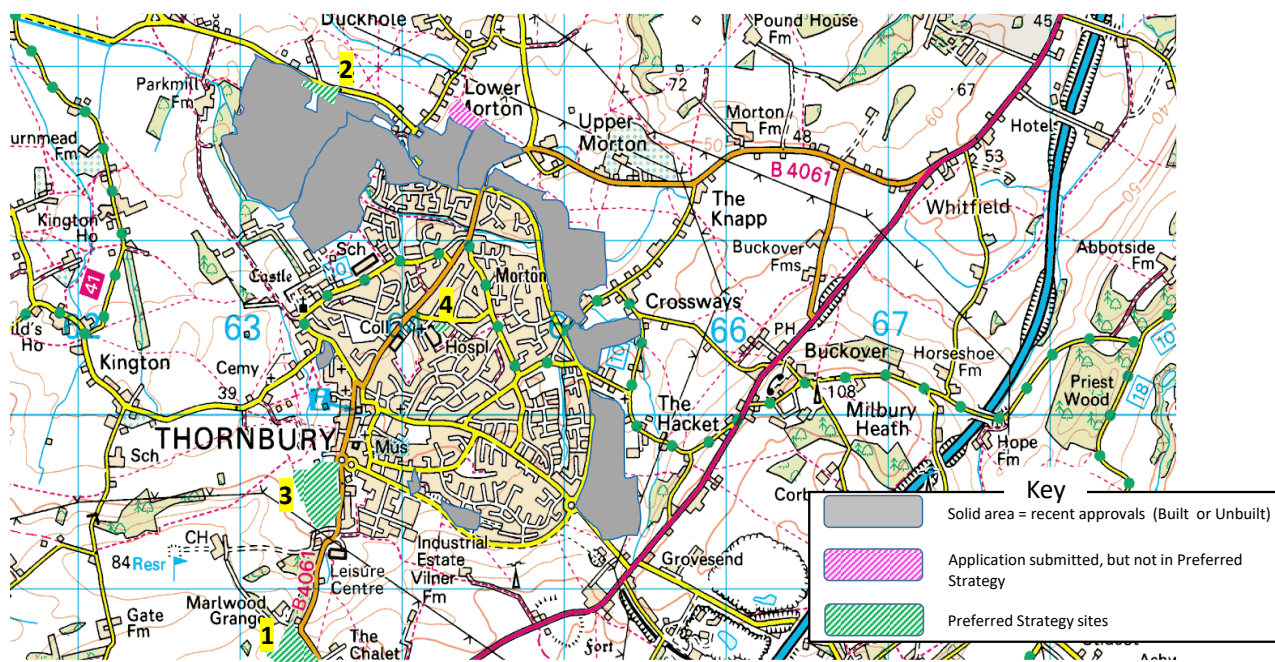
The intention is to fully satisfy South Glos's housing need over the next 15 years, as per the Government formula which, in round numbers, will require 20,500 new homes, of which 7,700 are already permitted, leaving a requirement of 12,800 proposed for new development. The Council's "Preferred Strategy" is relatively benign for Thornbury (see next section), but the Council will face a legal battle from disappointed developers and will need to show its workings as evidence of why this is the right way forward from a planning perspective. The consultation therefore sets out alternative strategies, which it refers to as 'lenses', and sets out its emerging view of why these are inappropriate – **this is battle number one**. Moreover, the consultation is clear that the Plan is designed to satisfy the Council's priority, which is for the housing need of this Authority alone and does not propose any contribution towards the huge shortfall in Bristol – **this is battle number two**.

We therefore have to win our arguments twice over in order to achieve this sensible way forward.

a: What does the 'Preferred Strategy' mean for Thornbury?

Some have referred to this as a 'distributed' strategy underpinned by the concept that "every town and village has a contribution". This strategy recognises all of the well-rehearsed downsides of allowing development to leap the Greenbelt and be concentrated in the north of the Authority, including the additional effect of the enormous impact from speculative development that we have already seen. Crucially, it is acknowledged that junction 14 of the M5 is "full" and would require a large nine figure sum to extend capacity. This is outside of the Council's control and therefore contributes to the lack of deliverability of an enormous extended version of Buckover, coupled with the fact that this would result in a huge increase in commuter traffic, thus undermining the commitment to carbon neutrality.

The Preferred Strategy gives Thornbury a partial break from new approvals, our main contribution being that on top of the 1,300 that have been built over the last decade, we have another 1,000 existing permissions still to be built (of which 785 are scheduled for the Plan period). On top of that, the Preferred Strategy proposes a further 130 new houses on four sites:



The Plan does not presently include anything for the Castle School 6th Form – presumably because there are some difficult unresolved issues with that site – and we assume that something will be added for this in the final version after the consultation. Also excluded is the extension of 32 houses to the Post Farm site, which we will continue to oppose.

TRAPP'D will submit its comments early in the New Year so, in the meantime, **we would like to hear residents' views about the Plan, in particular if there are specific concerns with regard to any of the four sites listed.** You can also respond directly to the Council's consultation on those specific sites (numbered from the map above) using the following links:

1. [Land off Alveston Hill](#) - 60 houses
2. [Land west of Park Farm](#) - 15 houses
3. [Land west of B4061](#) - 40 houses (Newland Homes)
4. [Former hospital site](#) - 15 houses

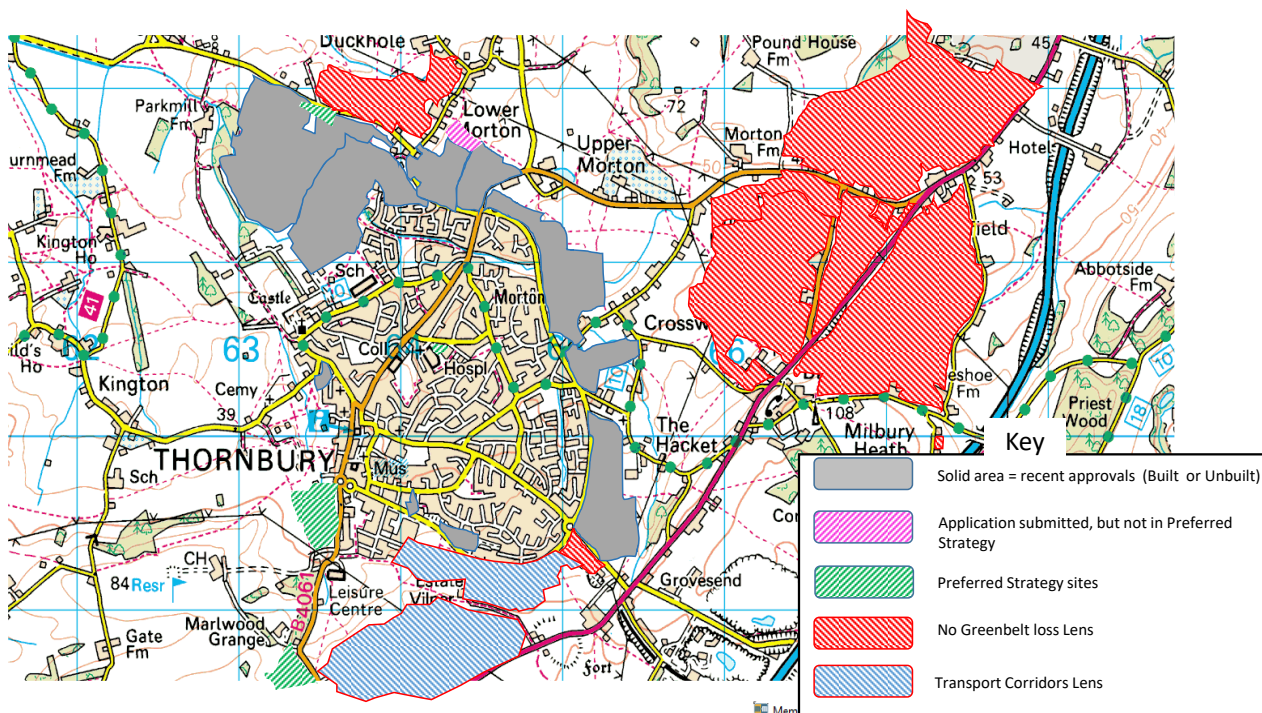
b: What about the alternative strategies?

The first alternative strategy is the “No Greenbelt loss” lens, which would be a complete disaster for Thornbury, including an extended cluster of 5 sites around Buckover comprising a total of **4,600 houses** (of which 2,400 are within the Plan period) and a further 220 to the north of Park Farm and Barwood, plus the field opposite Cleve Park on Grovesend Road/Midland Way.

Starting from 2010 this would give us an astonishing 7,600 new houses, amounting to an unmanageable 144% increase in the size of the town.

The other alternative strategy to impact us would be the “Transport Corridor” lens that would impose another 835 houses around Thornbury, concentrated around the A38 south of the town.

The map below shows an amalgamation of all sites under consideration, with the “No Greenbelt” option in red and the “Transport Corridor” option in blue:



c: What about the threat imposed by Bristol's unmet need?

This is a very serious issue, made worse by the recent Levelling Up Act which imposes an extra 35% housing requirement on 20 large cities including Bristol. We believe that the Council will attempt to show that South Glos is unable shoulder the burden of taking Bristol's unmet need, largely because of the same planning logic for rejecting the idea of leap-frogging the Greenbelt and concentrating development in the north of the Authority. Nevertheless, there will be a legal tussle over this question and the Council will have to show evidence of why it is unable to contribute to Bristol's need.

Bristol is slightly further ahead in the plan making process than South Glos, and it has now published the proposed plan that it intends to take to the Examination in Public in the Spring of next year (a Regulation 19 version). In its plan it is proposing to build a supply constrained amount of 1,925 houses per annum, which is 675 houses pa (or 10,000 over 15 years) below the amount stipulated by the Govt. formula. However, this is before the addition of the ridiculous 35% city uplift amounting to another 877 houses pa (13,000 over 15 years). The city council has stated that it “*considers that the best place to meet the housing needs of Bristol is within the city*”, but it has nevertheless asked neighbouring authorities to consider whether their local plans are able to contribute to the shortfall.

This consultation document says that “*through the continuing process of preparing our Local Plan we will be able to assess whether we can accommodate any of this unmet need. To perform this, an evidence-led approach for the consideration of alternative locations that considers not only the impact on individual sites but also the cumulative impact of Green Belt release on a locality-by-locality basis will be undertaken*”. The Government’s national planning practice framework states that the urban uplift is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. We shall have to wait and see.

d: What about the threat from speculative development, which is not in any plan?

It is true to say that the overwhelming majority of greenfield developments around Thornbury have been ‘speculative’ – that is to say they have not been in any plan. This begs the question ‘why are we bothered with having a plan in the first place?’, to which the answer is that our best defence against speculative development is both to have a plan in place and for it to be deliverable. This way a prospective developer with land not in the plan cannot use their favourite planning loophole to force permission. So, the watchword for the plan is that it must be deliverable, that is to say the rate of actual house completions occurs at no less than the rate given in the plan, and this is one of the key reasons that Buckover is a bad idea.

TRAPP’D will support a plan that we believe is both fair and deliverable but, clearly, any plan is made up of assumptions and those can change over time. Most particularly, developers are infamous for ‘land-banking’ practices whereby permission is sought for the most lucrative sites, but will not be built out until, and at a rate that keeps house prices high. We therefore see a slow down on house completions when the market is weak, which in turn means that the Council is not achieving its crucial five-year land supply, which then opens the door to speculative application – and so it goes on.

In view of our recent experience with speculative development, we will therefore also be pressing for more protection for our green spaces that we know developers are hungering after. The form and nature of that requested protection will be in our consultation submission but, in the meantime, we would encourage all residents to buttonhole their elected Councillors to support our campaign for better protection in future.