

CPRE Avon and Bristol

Leslie Forrest Chair CPRE South Gloucestershire



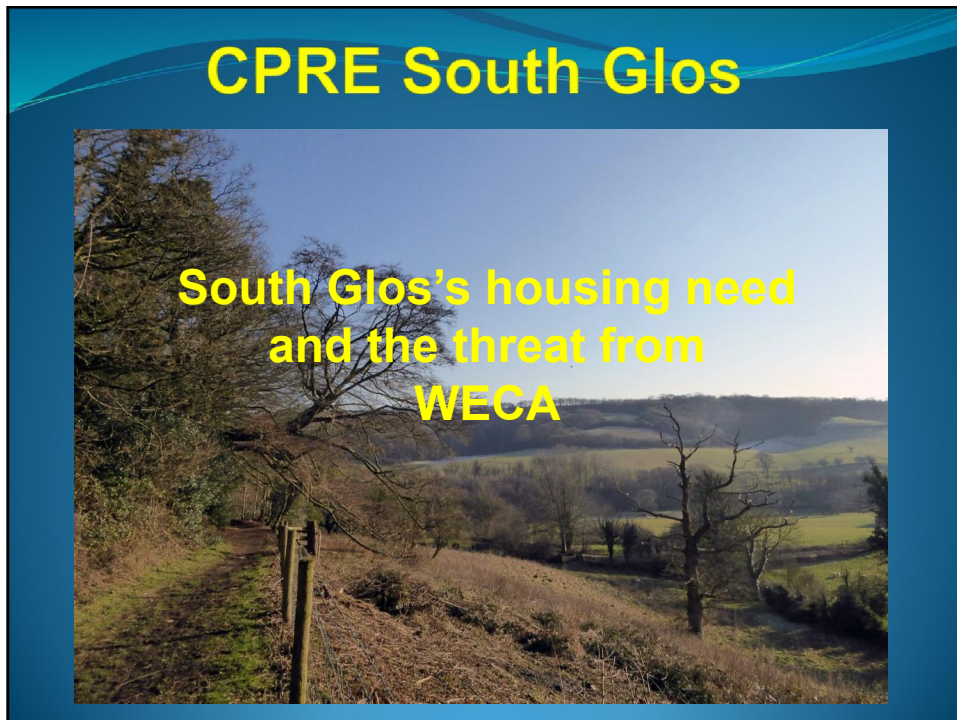
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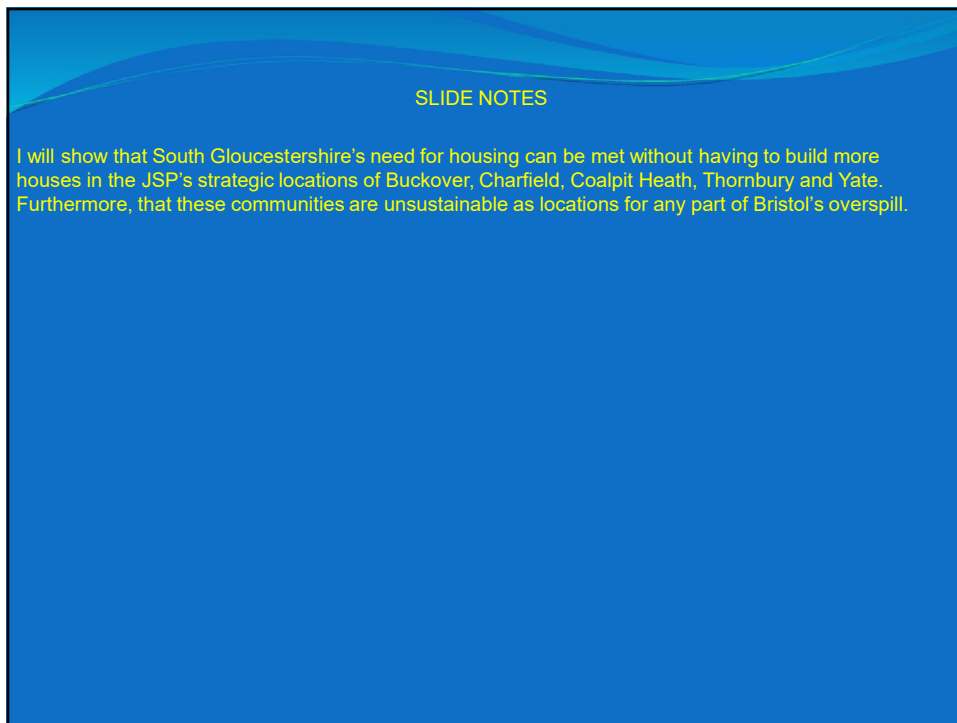
SLIDE NOTES

CPRE exists to protect rural England.
CPRE Avon and Bristol covers the West of England, South Gloucestershire which I chair, is one of its four Districts.

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CPRE South Glos

Acronyms

- **NPPF** (National Planning Policy Framework)
- **PPG** (Planning Practice Guidance)
- **ONS** (Office for National Statistics)
- **AMR** (Authority's Monitoring Report)
- **JSP** (Joint Spatial Plan)
- **SDS** (Spatial Development Strategy)
- **JLTP** (Joint Local Transport Plan)
- **BMV** (Best and most versatile land)
- **WECA and WEJA**

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These are the Acronyms I will be using.

- The **National Planning Policy Framework** is the set of rules that govern the planning process and against which applications and decisions are tested. It is not law, but short of going to court, it will govern the process. Many perfectly logical arguments made against planning applications are rejected; valid arguments must be based on this document.
- The **Planning Practice Guidance** is a set of notes to be read with the NPPF.
- The **Office for National Statistics** predicts the numbers from which Government decides the way a planning authority calculates its need. But politics intercede. For example; although the PPG calls for the use of the latest information, Government demands that the superseded ONS figures for 2014 be used because they produce a higher number.
- An **Annual Monitoring Report** is produced by each local authority. South Gloucestershire's is the basis for the calculations that follow and the conclusion that no more large housing sites are needed.
- The **Joint Spatial Plan** was produced by the four West of England Authorities covering the period 2016 to 2036. Its purpose was to show how the Region would develop and how this would be managed. It did not address the issues correctly, instead it promoted politically influenced solutions and then skewed the evidence to match. It was withdrawn after the inspectors suspended the public examination because they could not foresee them ever being persuaded that it was sound.
- The **Spatial Development Strategy** will be the replacement for the JSP. If lessons from the failure of the JSP have not been learnt, it too will be judged unsound.
- The **Joint Local Transport Plan** is concerned with the transport needs of the Region but whilst it warns again and again of past failures to match development with infrastructure, by the very size of its ambitions it is condemned to repeat history. I have a concern that the illogical adoption of it after the JSP was abandoned, indicates a belief amongst the secretariats that the SDS is merely a rebranding of the JSP.
- **Best and Most Versatile Land**. A very scarce resource which is to be protected.
- **WECA and WEJA** will be explained when I look at the area beyond South Gloucestershire.

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South Glos's Housing Need

Method of calculation from the NPPF gives a total need of 15 years x 1,412

21,200 dwellings

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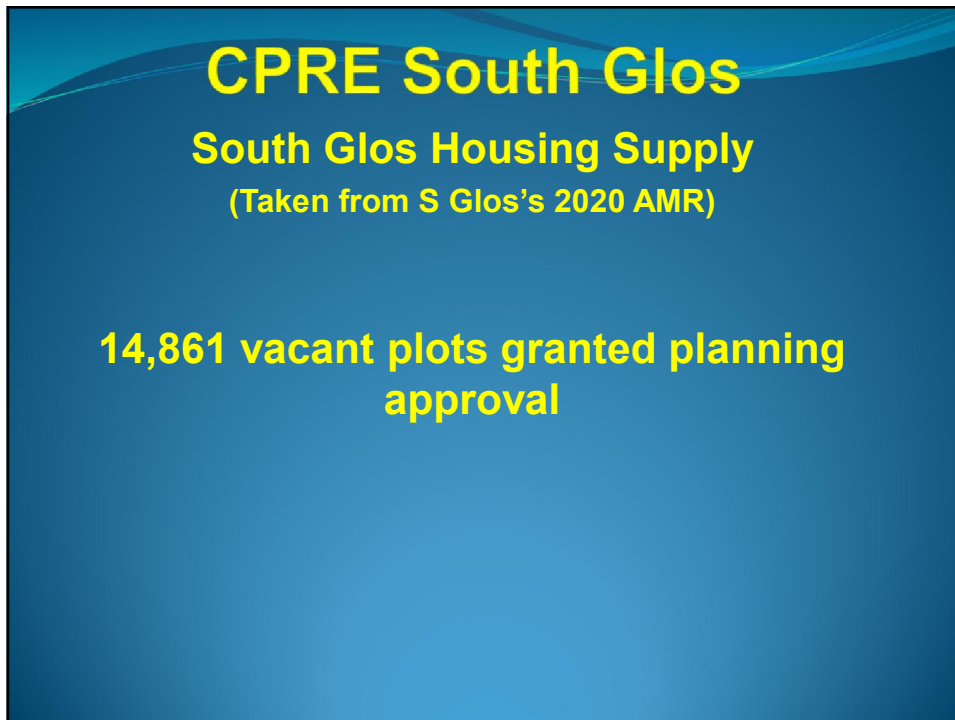
The NPPF calculation involves a multiplier called the affordability factor, derived from the relationship between an area's average house price and average earnings.

In South Gloucestershire this increases the need by 29%; without it the target would be 5,000 fewer than the number on screen.

The underlying hypothesis is that providing more housing sites will drive down prices, a theory debunked by many sources including the Government commissioned (but ignored) Letwin report. House price inflation has more to do with quantitative easing than supply.

South Gloucestershire's plan is for 15 years, the minimum permitted duration and the result is 21,180.


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South Glos Housing Supply
(Taken from S Glos's 2020 AMR)

14,861 vacant plots granted planning approval

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The AMR for year ending April 2020, shows that excluding windfalls, permission has been given for fourteen thousand, eight hundred and sixty-one housing plots. It also predicts how many completions are expected in each year.

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CPRE South Glos
South Glos Housing Supply
 (Taken from S Glos's 2020 AMR)
Windfalls
 AMR uses 210 per year
 WHY?
 Average since 2006 is 253
 Recent years 284.

**South Glos has underestimated by over
 1,000**

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The rules allow for the inclusion of as yet unidentified small sites of fewer than ten houses, called windfalls.

The NPPF requires that the allowance be realistic, the AMR assumes 210 per year.

This is **unrealistic** because in every year since 2006 this has been exceeded, it quotes the average as 253.

There is also a direction to use the latest figures which the AMR records as 284.

South Gloucestershire should be catering for many more windfall sites.

Over 15 years the difference between the discredited number used in the JSP and recent performance almost equates to the Buckover site.

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South Glos Housing Supply

NPPF 69.

- **Small and medium sized sites can make an important contribution.**
- **At least 10% of housing to be on sites less than 1h/A.**

AMR 2020 (excluding strategic locations and windfalls) 313 per year.

4,400

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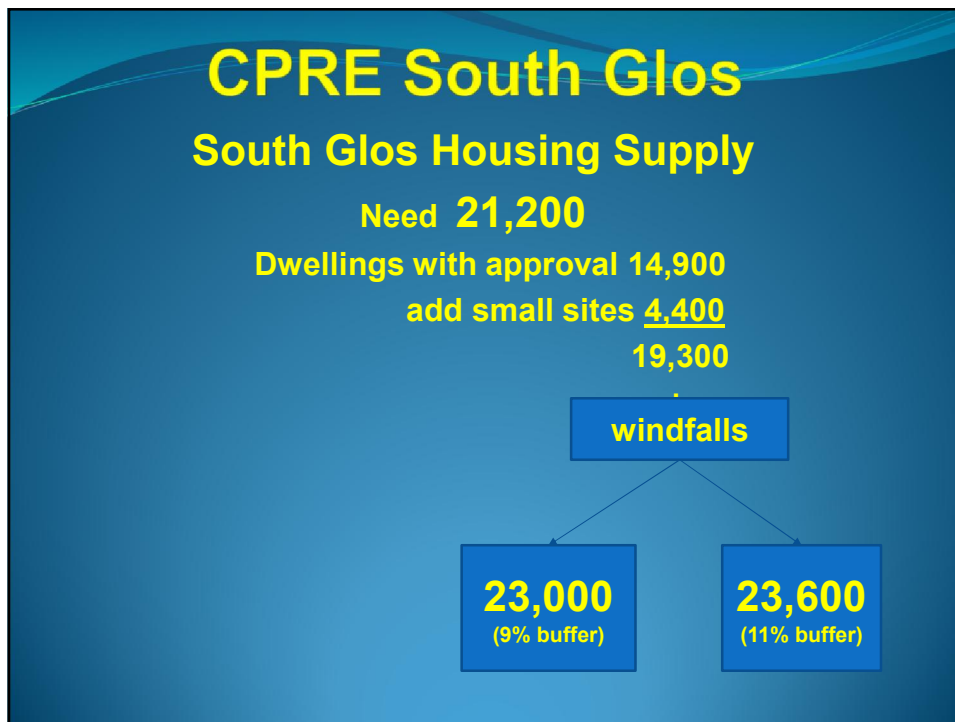
The majority of the plots with planning approval in the AMR, are on the large or as the JSP defined them, strategic sites.

NPPF says small and medium sites are important because, amongst other things, they facilitate smaller builders entering the market and are usually built without the delays often experienced on large developments.

Look no further than Thornbury's Cleve Park where work has just started years after permission was granted.

We predict these sites to yield 4,700 but as some come from existing but uncompleted sites, the net figure is 4,400.

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This is our prediction of the range of the number of dwellings to be expected during the life of the Plan, somewhere between nine and eleven percent more than the affordability inflated need. Without the latter the overkill would be at least 42 percent. Make no mistake, these extra houses will not be built, there is no market for them.

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CPRE South Glos South Glos Housing Supply Numbers from JSP

Total without the strategic sites or windfalls	16,725
+	
Built or approved in strategic areas	1,956
+	
Realistic windfalls	4,260
TOTAL	22,941

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My predictions are credible. I went to the JSP and took what its authors predicted for the 15 year period, removed the strategic sites, added back the number of plots already approved on those sites and the windfalls at realistic levels.

The result was 23,000; an exact match.

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South Glos Housing Supply

South Glos's need can be met without recourse to more large sites.

There is a substantial downside in planning for too many houses.

Who pays and who gains?

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There is no need to destroy Buckover in order to satisfy the inflated target.

Two serious issues arise from planning for more houses than are needed.

First; instead of creating a buyer's market and driving down prices, the major developers as Letwin confirmed, will maintain prices by cutting back on the numbers built. Granting approvals for more land than is needed enables them to select the most attractive sites not those best suited to what our communities need. Rather than building in the urban areas close to facilities, served by existing low carbon transport, they will rip up the scarce agricultural land and add to the levels of pollution. It runs contrary to the brownfield first instruction

Second; for the first five years of the plan it is the yardstick against which the five year land supply is judged. No five year supply and it becomes developer heaven, all sites are given permission no matter what. Colin will say more on this.


Let us be clear, if Buckover is developed, it will be to feed either the greed of developers or to fill South Gloucestershire's coffers, or both,. Not the need of residents.

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The West of England Threat

- WECA (West of England Combined Authority)
- WEJA (West of England Joint Authority)



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South Gloucestershire with Bath and North East Somerset, and Bristol entered into a devolution deal that created the regional mayor; they are the West of England Combined Authority.

Add North Somerset and the result is the West of England Joint Authority.

When drawing up the JSP, WEJA allocated South Gloucestershire an extra 8,000 dwellings (significantly more than BANES or North Somerset).

Since then, the numbers have increased, Bristol particularly so.

THIS is the threat.

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Here are the NPPF figures for the individual authorities that make up WECA and WEJA. Bristol's task is challenging and its need for truly affordable houses is dire. North Somerset at one point was looking to its neighbours for help but is now planning to cater for its own need. This could be to strengthen a case for not helping Bristol.

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Bristol's Need

In December the NPPF annual figure for Bristol was increased to 3,196 (twice the existing build rate).

The JSP allocated the majority of Bristol's shortfall to S Glos.

If the SDS does the same S Glos will have to plan for twice what it needs.

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To quell a back-bench revolt the Government rather than properly assess how many houses were needed, increased the targets for the cities.

This is far from reality, mere dogma conjured up to match a boast of building 300,000 houses a year, itself a figure plucked from the air. Not only my view, in its June 2021 report the Commons Select Committee said much the same.

This is where the threat to our area arises. Bristol is building at about half the rate it needs to match this target and if the thinking that prevailed in the JSP continues into the SDS then South Glos will 'volunteer' to take the majority of the shortfall.

If N Somerset declines to help it could mean planning for twice as many plots as we need.

As I have already said, setting a higher target is not benign, it has serious implications for our rural areas including Buckover.

Developers have long sought the removal of all planning restrictions permitting them to select not where is best suited for development but where the most profit can be extracted.

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PPG 035.

1. It is expected that the **cities uplift** should be met by the cities themselves, rather than the surrounding areas.
2. In the first instance brownfield and under-utilised urban sites should be prioritised with optimised density for efficient use.
3. This is to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the services they rely on, making travel patterns more sustainable.

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SLIDE NOTES

In December 2020 changes were made to the NPPF and the PPG.

Here you can see the latter appears to address the issue:

First; it is expected that the cities uplift should be met by the cities themselves, rather than the surrounding areas.

Second; brownfield first and under-utilised urban sites should be prioritised with optimum density for efficient use. Think about the space wasted on ground level car parks and sites that have no function outside business hours. The Georgian architecture of Bath and Clifton has 70+ dwellings per hectare. Victorian terraced working homes, even more.

Third; build in the right places, to make the most of existing infrastructure, and to allow people to live nearby the services they rely on, making travel patterns more sustainable. Don't build in places that encourage commuting by private car.

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NPPF

- The planning system should support the transmission to a low carbon future,
- contribute to a radical reduction in greenhouse gas emissions,
- support renewable energy & existing infrastructure,
- avoid homes being built at low densities.
(Sustainable Development Commission 2007.
“A density of at least 50 per hA is needed to support a frequent bus service.”)

Thornbury:

Town brownfield sites 120+ dwellings per hA
Outer fringe 15- dwellings per hA

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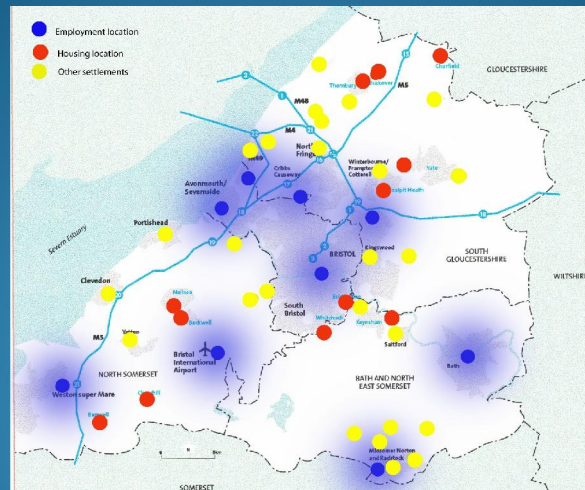
The NPPF also weighs in:

- Directing that planning should support a low carbon future.
- Contribute to radical reductions in greenhouse gas emissions
- Encourage the use of existing resources.
- Convert existing buildings.
- Support renewable and low carbon energy and existing infrastructure. This rules out siting development in locations that promote commuting by private car like Morton Way and Butt Lane.
- Avoid building at low density. Note the comment about bus services; low density needs a subsidy from taxation. High density does not mean high rise neither does it preclude attractive desirable homes. There are numerous examples of good design at densities exceeding 250 dwellings per hA. Fifty is classed as low to medium and Thornbury illustrates what is happening. Along Morton Way car dependent houses at 15 per hA, in the town on brownfield sites (former Council Offices, Police Station and Cattle Market) 120 per hA.

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The JSP solution



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But be wary; there were equally comforting words in the same documents when the JSP was ushered into the world and this illustrates how WEJA interpreted the result. The blue areas are the employment locations with a 'halo' indicating the area within which cycling or walking to work or to access services is feasible.

The red dots show where WEJA decided to put the houses, you don't need to look closely to see in the case of South Glos some are as remote from where they are needed as it is possible to get.

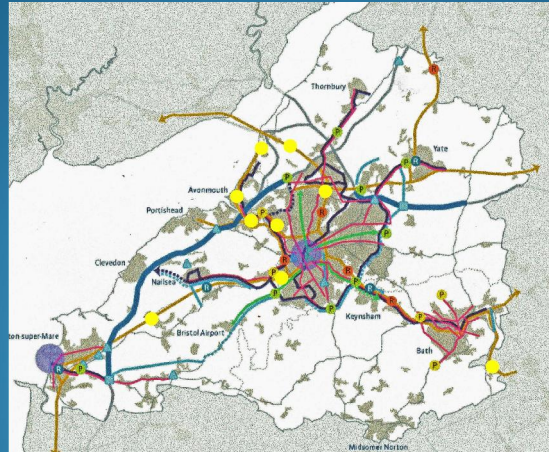
The yellow dots denote the communities judged unsustainable in serving the employment locations; look at the bottom right, a rash of yellow dots clustered around a strategic employment location. I can tell you every one of those communities has better services and is more sustainable than Charfield.

The choices were political, and who took up the slack? **South Gloucestershire.**

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JLTP provision to keep commuting to 2016 levels
Estimated to cost £1m/day for 20 years



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In an attempt to plead that the locations were sustainable, which the inspectors didn't swallow, WEJA came up with this infrastructure plan which was variously priced between eight and twelve billion pounds. As a minimum they needed to find and spend £1m a day every day, for twenty years.

The map omitted nine existing railway stations (the large yellow blobs) together with those planned on the reopened Portishead line, because they supported other locations not the chosen development sites.

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JSP solution of greenfield sites served by new infrastructure is incompatible with every new stipulation.

- 1. It does not address the chronic shortage of places where people can afford to live and work.**
- 2. Its travel patterns are unsustainable.**
- 3. Requires a vast infrastructure investment merely to maintain carbon emissions at 2016 levels.**
- 4. It fosters low density commuter housing.**

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SLIDE NOTES

The JSP greenfield housing locations are incompatible with the stipulations listed earlier.

- They do not address the chronic shortage of places where people can afford to live and work.
- Their travel patterns would be unsustainable.
- They require a vast infrastructure investment merely to maintain carbon emissions at 2016 levels let alone reduce them radically.
- They foster low density commuter housing.

Consequently, we need to monitor carefully the process of producing the SDS.

One consultation has been conducted with vague questions and little detail.

The next stage with only 12 weeks to respond, will reveal the detail and if the past is indicative, claim the answers to the non-specific questions of the previous round give it the legitimacy of democratic support. If SDS turns out to be JSP Mark 2 then Buckover will be up for grabs despite it not matching any of the new requirements.

However, in three of the four authorities (Bristol being the exception) there are new people and there is also a new Metro Mayor. Let us hope they will not make the same mistakes.

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Bristol's need

Does Buckover (or any other South Glos remote rural site) suit?

- **Is it brownfield ?** **No**
- **Based on existing infrastructure ?** **No**
- **Close to employment areas ?** **No**
- **Reduces transport carbon ?** **No**
- **Built at medium/high density ?** **No**
- **Predominantly affordable ?** **No**
- **Preserves scarce BMV land?** **No**

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How do remote sites help Bristol.

They don't; they produce the wrong houses in the wrong places and will be developed at a pace to maintain profitability not alleviate housing need.

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Bristol's need

Would the building of a new station at Charfield make Buckover sustainable?

- Limited to an hourly service.
- Only 70 parking spaces.
- Wrong direction why drive North to go South?

In short, irrelevant to the issues it is said to solve.

A38 MetroBus

- Congestion.

First and Last mile.

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Finally, South Gloucestershire is currently 'consulting' on Charfield Station which the JLTP seeks to sell as the answer to Buckover's remoteness despite the severe unsolved technical problems arising from the lack of capacity at Westerleigh Railway Junction.

In the JSP it was also cited as the answer to developing Thornbury and Charfield and, is referred to as a mitigation in the expansion of Wickwar.

How can an hourly service and 70 parking spaces have any significant effect on existing traffic patterns and reduce carbon emissions?

Why would people living outside Charfield drive North to commute South, many passing through M5 Junction 14 on the way?

It is a smokescreen generated to hide that these northern locations are unsustainable.

As for MetroBuses serving it and Thornbury, they will be gridlocked with the cars.

a new term is cropping up with regularity in overcoming grid lock, first and last mile. I think the planners have in mind, **pink scooters**.

But there are new guys on the block, let us hope they are reasonable.

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Since 1940, the population of Los Angeles has grown at about the same rate as London. Los Angeles is now so enormous that if transposed here it would stretch from Brighton to Cambridge. That's what happens if you don't keep watch, have no sensible planning laws, and give developers and landowners free reign.



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SLIDE NOTES

This shows what can happen to cities not constrained by green belts with everything made insubordinate to profit.

Since 1940, the population of Los Angeles has grown at about the same rate as London. Los Angeles is now so enormous that if transposed here it would stretch from Brighton to Cambridge.

Make sure that those to whom you have loaned your voice, Member of Parliament, Mayor or councillor know what it is you want said on your behalf when WECA or WEJA seek to allocate extra housing to South Glos.

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