

Wick and Abson Parish Council

To:

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Carl McClure and Patrick Conroy, South Gloucestershire Council (SGC)

Copies:

Cllr Chris Wilmore, SGC Cabinet Member for planning, regeneration and infrastructure
Cllr Matt Palmer, Labour lead for planning, regeneration and infrastructure
Cllr Marilyn Palmer, SGC Ward Councillor, Boyd Valley
Cllr Ben Stokes, SGC Ward Councillor, Boyd Valley

Date:

30 January 2024

Subject:

Wick and Abson Parish Council response to SGC Local Plan phase 3 consultation

Wick & Abson Parish Council requested that SGC make a formal presentation to parish residents about the local plan phase 3 'emerging strategy' that includes the building of 70 new homes in Wick.

This was rejected by SGC so residents were unable to raise their concerns directly with the relevant officers. Consequently, Wick and Abson Parish Council held a public drop-in session and extraordinary parish council meeting on Thursday 18 January 2024. This drop-in session was supported by display information provided by Carl McClure of SGC.

Over 150 residents attended the drop-in session and a further 52 residents attended the council meeting. Below is a summary of the many points raised by residents in Wick and Abson.

Consultation

Residents expressed disappointment that the consultation commenced in the run up to Christmas and was described as a cynical ploy to distract attention away from the likely impact of the plan during a busy period.

Publicity for the SGC local plan has been led by residents on social media, by parish councils, and by green spaces pressure groups rather than SGC itself. SGC should be obliged to send information to every home in the area to highlight the local plan to residents but chose not to do so. In view of this, Wick & Abson Parish Council undertook a door to door leaflet drop to advise residents of the emerging strategy consultation.

The local plan phase 3 documentation runs to 251 pages with appendix information. It is very wordy and discourages full understanding. Residents believe that an executive summary is required and this is supported by Wick & Abson Parish Council.

The maps provided by SGC lacked sufficient detail for residents to identify settlement boundaries, main roads, landmarks and numbers of new homes proposed on each of the designated sites shaded in blue. Wick and Abson Parish Council added this information for its drop-in session which provided clarity to residents.

Building in the Green Belt

While many residents accept that some housing development is required, notably social housing at affordable rent levels in urban areas, as a matter of principle, building in the green belt is unacceptable. The Town and Country Planning Act 1947 was established to protect green belt land. SGC has failed to demonstrate any 'exceptional circumstances' that might overrule that principle.

Residents require SGC to justify why it believes that building in the green belt meets the criteria of 'exceptional circumstances' that are required to satisfy the Secretary of State. There is no meaningful data in any of the documents that justify this proposal especially considering Michael Gove's recent advice that unitary councils should not seek to use green belt land, and should focus on smaller, more integrated settlements that will have less impact across the whole area.

Paragraph 154 of the NPPF states that: 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.

Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building if it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'

This local plan fails to satisfy the exceptions. Residents believe that the local plan is merely a house developers' charter to maximise their profitability and shareholder value.

House building targets and population growth

The government's target to build 300,000 new homes a year is unrealistic and, therefore, makes the SGC target an arbitrary one. The UK does not have the workforce capacity to build 300,000 new homes a year. Between 1972 and 1979, some 270,000 new homes per year were built, mostly by local councils. In the 1980s, the UK built around 200,000 homes a year and has rarely achieved that level of building since. The NHBC reports that 192,000 new homes were built in 2022.

SGC claims that the local plan is driven by the need to provide homes for the increasing population. In South Gloucestershire, the recent population projections published by the Office for National Statistics in December 2023 indicate that the local population will grow by 25.4% over the 15 year period from 2025, if the current economic situation continues, due to national migration from other UK areas. Of this increase, 44% is projected to be people over 65 years old; this demographic group is more likely to need smaller, 1 and 2 bedroom homes rather than the 3 bed semi-detached and 4 bed

detached that developers prefer to build. This is borne out by the results of the Wick and Abson Parish Council Housing Needs Analysis report from 2017.

The SGC local plan promotes the building of sustainable, affordable homes. 'Affordable' is defined by government as about 20% less than the market rate. In Wick and Abson over the last year, according to Rightmove, the average sale price of property was £556,786 giving an 'affordable' rate of £445,428. This is not an entry level price for first-time buyers who need 2 and 3 bedroom homes.

The local plan claims to achieve 35% social housing. This is disingenuous as it is well-known that developers renege on social housing requirements after obtaining planning approval. The Chieftain Trading Post development site in Bitton and the withdrawn development application on the land opposite the former Carpenters Arms, Wick demonstrate this point. It is suggested that some homes may be shared equity; potential buyers need to be aware that while the equity is shared, the costs of part-owning such homes are born entirely by the occupant.

SGC claims to have around 5,000 people on the housing waiting list. The area needs social housing at affordable rent levels, located in urban areas so residents may access employment, public transport and local services. The focus must be on utilising empty homes, empty retail units in town centres and brown field sites for social housing development outside of the green belt.

Residents expressed alarm at the obvious and disproportionate volume of 4,000 proposed new homes in Warmley, Siston and Shortwood that would change the character of this semi-rural area.

The Department for Levelling Up, Housing and Communities figures report that 723 homes in South Gloucestershire were designated as long-term empty as of October 2023. This is an increase from 704 during the same period in 2022. The figures cover the number of dwellings that have been empty for more than six months, excluding those due to flooding or vacated by people in prison.

There were 102 second homes registered in South Gloucestershire. Separate figures show 152 homes owned by private registered providers in South Gloucestershire, which are self-contained social and affordable rent houses, that were vacant in 2022. Residents fail to see what measures SGC is taking to get these homes back into constant use. Wick and Abson Parish Council agrees with the residents' view.

Road infrastructure

The road infrastructure around Bristol's eastern fringe has become inadequate. This will deteriorate with thousands of new homes bringing thousands of additional vehicles to the area. The A420 runs through the parish and is already congested daily from Riding Barn Hill to Bridgegate at peak times, with westbound queues often stretching from the bottom of Tog Hill through Wick, some 3.7 miles.

This is made worse by traffic trying to bypass the A4174 ring road and the M4 and M5 when there is a major incident on the local road network. This congestion makes it difficult for residents to cross the A420 safely due to the lack of formal crossings along the High Street. No new infrastructure is planned for Wick and Abson.

A request for a formal crossing on the High Street in Wick was lodged over 8 years ago and has been chased as recently as autumn 2023. The Parish Council has been informed that, in the absence of any local infrastructure levy payments, it would need a death on the road to hasten the installation of a new crossing.

While access to and egress from any development should be directly to single carriageway roads rather than single track lanes, this would add to the current congestion. Wick already suffers from increasing traffic volumes due to the closure of the A432 (Badminton Road) for M4 bridge repairs.

Residents expressed concern about the inevitable heavy construction traffic that the local plan development would bring to Wick, and the constant threat from many vehicles speeding through the village in excess of the 30mph limit. Narrow footpaths add to the sense of danger when walking along the High Street. Speed data gathered in July/August 2023 has been passed to Avon & Somerset Police who has yet to react in any meaningful way.

Public transport

Bus services are the only means of public transport to service the area. These services were revised and reduced in 2023 so that there is now no direct service to Bristol centre. Living in Wick and Abson and needing to access employment and services means that residents must travel by private car or taxi. The idea that residents in new homes could use 'sustainable' transport is misplaced.

Medical services

Wick and Abson Parish falls in Network 4 Primary Care Network - Three Shires Medical Practice. The Integrated Care Board has four surgeries and is said to be able to cope with the additional demand from housing in Wick.

The reality is, it is extremely difficult to get a same day appointment to see a doctor in person so how will an already struggling surgery cope with 70 more families? There is no NHS dentist in the vicinity meaning that residents would need to travel to Kingswood or beyond. Residents must rely on private cars or taxis to attend hospital appointments in Bristol and Bath.

Schools

Forward projections using births registered in the area indicate there are surplus places in each year group. The new development is expected to yield about 25 children when finally built across the age ranges, so the mapping shows there is headroom for those children (unless they all arrived at once and were all the same age). Whilst the higher age groups are close to capacity, this is the result of a baby boom working its way through the system. However, the birth rate is declining sharply so at October 2023, year 4 was full but there were places in all other years.

When you use birth rates to look at what is coming through the system, by 2027, the lowest age groups have under 20 children, against a capacity of 30. Predictions based on the children already born and living in Wick now show every cohort will be at or below 20 by 2027 (apart from year 6 which will have 23 and year 5 which will have 21). Wick Primary School needs more children to boost numbers to sustain its income. This underlines the need for 2 and 3 bedroom starter homes in the parish rather than 3 and 4 bedroom semi-detached and detached homes that are preferred by developers.

Students in year groups 6 to 11 must be bussed or taken by private car to the nearest schools in Oldland, Kingswood and Bath.

Employment

The local plan aims to create 25,000 local jobs. Currently, there are over 12,000 job vacancies which begs the question, who will fill these new jobs that are created?

Climate change/net zero

SGC declared a climate emergency on 17 July 2019. In its statement, SGC said, "We recognise that the global climate is in a state of breakdown and this is an emergency. We also recognise that biodiversity and the natural systems on which all life depends are in crisis. We are taking action by preparing for the local impacts of the climate and nature emergency, reducing our carbon emissions and protecting and restoring our natural environments."

Building thousands of new homes in the green belt, mostly on green field sites puts SGC at odds with its own policy. The local plan emerging strategy to build on green field sites will cause serious harm to the biodiversity of the local natural environment. Building over green field land will increase the risk of flooding due to new infrastructure and hard surfaces and pollute local waterways.

The increase in construction traffic and new residents' vehicles will increase emissions and particulates across the area. Particulates are especially damaging for the lungs of young people.

The only way to achieve anything close to net zero is to minimise consumption. Building thousands of homes in the area will do the very opposite of that. Residents believe that SGC is more interested in the additional council tax income that these new homes generate than saving the green belt.

The most recent State of Nature report (2019) from the National Biodiversity Network suggests there has been a steep decline in the abundance of wildlife in the UK since the 1970s. The scale and pace of nature loss is having critical impacts on the natural systems on which all life on earth depends. Locally, nationally, and globally it is recognised that urgent and more action is needed.

Although in the UK certain sites and species are protected, there are limited mechanisms to value, maintain, enhance and create wildlife habitats beyond protected sites. Building on the green belt will exacerbate these problems.

Biodiversity net gain

From January 2024, all planning permissions granted in England (with a few exemptions) will have to deliver 10% biodiversity net gain under the Environment Act 2021. Biodiversity net gain (BNG) is an approach to development which means that habitats for wildlife must be left in a measurably better state than they were before the development occurred.

It means designing developments in such a way that provides benefits to both people and nature and reduces impacts on the wider environment. BNG is achieved by retaining and enhancing existing habitats and creating new habitats and can be delivered on site, off site, or via credits.

Wick development sites

Residents gave feedback on the proposed sites:

EPS-BV8 rear of 91 High Street - 10 homes plus business units

This site is accessed by a single track lane that is unsuitable for the increase in traffic volumes any development would bring.

Site was used between 1994-1998 as a tip. Information should be available in old planning records as land not suitable to build on.

EPS-BV1 Wick Quarry - 25 homes

This is a brown field site and is acceptable for development. There was concern about additional traffic accessing Bury Lane and residents have requested that could a one-way route be explored.

EPS-BV4 land north of London Road – 30 homes

While this is green belt, green field land, it was observed that it could be regarded as infill. This site would extend the village beyond the settlement boundary and is unacceptable.

Other brown field sites on the boundary between Wick, Abson and Doynton have not been explored thoroughly and this requires review.

Recent statements by two local landowners that their sites listed on the local plan are not available for housing development, brings into question the process to choose all sites and must be reviewed.

Wick and Abson Parish has historical sites which are protected in the settlement. These include **Wick Court** which has the remnants of a 17th-century formal garden, a 17th-century avenue of yew trees, a Tudor-style summerhouse, a sunken garden, and a walled garden. This record was checked with South Gloucestershire Historic Monument Records Officer in June 2010. Another historical site in Wick is the St James the Great Church. The church is a listed building, as are the churchyard walls.

Any development within Wick and Abson Parish must consider the protections afforded to these sites of great historical importance.

Conclusion

Residents stated that the local plan 'emerging strategy' is merely a green belt, housing developers' charter, will not achieve its objectives regarding social housing, affordable housing, starter homes and employment, and will have a major, negative impact on these important green spaces.

Property developers must be compelled to build on landbank sites that have planning approval.

Further consideration should be given to the local plan 'lens 1' option, that avoids any building of new homes in the green belt. That said, in the lens 1 option, greater consideration must be given to the impact of building large numbers of homes in small village locations that would destroy the local landscape.

Residents reject the local plan emerging strategy proposal as SGC has failed to demonstrate need and understand the negative impact on roads, services, green spaces and the character of the area.

The Parish Council fully supports residents' rejection of the local plan emerging strategy.

Cllr James Williams

Chair, Wick and Abson Parish Council.