

Why 1000 New Houses For Charfield Is 'Unsustainable Development'

Charfield Parish Council's response to the 'West of England Joint Spatial Plan: Towards the Emerging Spatial Strategy' document

Introduction

1. This document has been prepared in response to the consultation document "West of England Joint Spatial Plan: Towards the Emerging Spatial Strategy" (Strategy) published in November 2016. Reference is also made to the Joint Transport Study (JTS), November 2016.
2. It is recognised that South Gloucestershire Council (SGC) and the wider region are facing a major challenge of finding sites for a large number of new homes nevertheless these must meet the national and local planning policies and aims particularly the Government's over-riding aim of 'sustainable development'.
3. This document will only address the application of the Strategy to Charfield. It will look at the arguments made in the Strategy and assess these against the principle of 'Sustainable Development' as defined in the National Planning Policy Framework (NPPF).
4. We understand that the Strategy is a proposal at this time and that all consultation responses will be given serious consideration.
5. The level of detail in the Strategy is sparse and only addresses numbers and broad areas of growth. Much of the NPPF addresses detail at the design/planning application stage so comment at that level at this stage of planning is neither required nor appropriate. However it is assumed that any and all developments in the county will be subject to the highest standards of design as outlined in the NPPF.
6. Planning decisions are made recognising that not all developments can be totally beneficial and can also bring harms. These terms will be used in the document in this context. For development to be sustainable the benefits of that development must outweigh the harms and certain harms are so severe that they outweigh any benefits.

Sustainable Development

7. It is worth stating what sustainable development is, as it is the cornerstone of this document. The United Nations have defined it as "meeting the needs of the present without compromising the ability of future generations to meet their own needs"¹.
8. There are five guiding principles of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society, achieving a sustainable economy, promoting good governance, and using sound science responsibly.² The Government has narrowed down these principles in respect of planning to cover economic, social and environmental dimensions. These dimensions perform a number of roles:
 - **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
 - **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

¹ NPPF page 2

² NPPF page 2

Development policies out of date

9. Currently NPPF paragraph 14 is in operation in SGC planning decisions. This is leaving the County open to predatory planning applications that may be ill conceived and/or ill-placed leading to random development. This is unsatisfactory to SGC, Charfield Parish Council and residents alike. All parties are keen to see a well-thought out and ‘sustainable’ spatial plan in place as soon as possible.
10. Whereas the whole of the NPPF is relevant in planning decisions, SGC is currently placing emphasis on paragraph 49 for a presumption of permission in the lack of a 5 year land housing supply. This presumption exists only for sustainable development, and should not be engaged for any other purpose.

Charfield now

11. Today Charfield is a village of just over 1046 dwellings with a population of about 3000 (2538 in 2011); of that under 18 year olds form 25 to 30% and the over-65s 15 to 20%³. Currently approved developments will add another 170 houses – a 15% increase in the population. At the time of writing there is a speculative application about to go before SGC for another 123 homes at Warner’s Court, which if permitted would raise the percentage increase to nearly 28%

Sustainability of Charfield

12. South Gloucestershire carried out an exercise in 2015 to assess the ‘sustainability ‘ of each of its towns and villages. The criteria, ratings and final results are included at Annex A.
13. This resulted in Charfield being defined as having a ‘Tier 2 Good Access’ rating. This rating has in large part driven the allocation of up to 1000 additional houses under the Strategy. We believe that this is an incorrect assessment and in reality Charfield is and will remain an *unsustainable* development location with poor access. This document will demonstrate that current services and facilities are inadequate to support ‘sustainable development’ and that even with the future expanded village as proposed under the Strategy will fail to develop into a ‘sustainable development’.
14. This table looks at the services and facilities SGC have used as their method of assessment in relation to Charfield:

Theme	Service or facility	Provided	
Health facilities	GPs	Wotton 4.5km away Thornbury 12 km away	
	Pharmacy	Weekly collection from shop	
Food & retail facilities	Town centre	None	
	Supermarkets	None	
	Individual Convenience & comparison shops		‘Costcutter’ mini-supermarket
			Hairdressers
Access to Major Employers	Renishaw	See paragraph 25	
Public Transport access to major areas	Bus	2-3 hourly service to Thornbury and Wotton-Under-Edge	
	Railway	Potential to re-open the station	
Broadband	Good speed	High speed broadband only available in part of the village	
Community facilities	Dedicated	Memorial Hall and playing fields	
	Library	Mobile service available every 2 weeks for 30 minutes now due to be ceased due to cost cutting.	
	Post Office	Within ‘Costcutters’	

³ Based on the 2011 census

	Public house	2 plus a micro-pub
Education Facilities	Secondary	Wotton 4.5km away Thornbury 12 km away
	Primary	In village and at capacity

15. Compare these village services and facilities with SGC's Definition of Sustainable Access detailed in Annex A and it is clear that a more accurate ranking is Tier 4 – Poor Access.
16. We have looked at each of these 'themes' in turn and assessed them in the light of existing infrastructure and what might be available in the future.

Health facilities

17. Charfield has no health facilities in the village and the majority of residents use the facilities in Wotton and Thornbury. In April 2016 both the Chipping Surgery and Culverhay Surgery in Wotton closed their branch surgeries in Wickwar and Hawkesbury Upton. It is a national trend to close down surgeries and amalgamate staff and services in order to offer more complex and specialist services in a centralised location. It is therefore highly unlikely that a new surgery would be opened up in Charfield even with a 100% increase in the local population.
18. Existing health facilities are being diluted because of the workload facing local surgeries - for example repeat prescriptions are now supplied under a 72 hour turnaround rather than a previous 48 turnaround (Chipping Surgery November 2016).
19. In January 2016 the Government announced plans to close 1 in 4 pharmacies, the majority of which would have been in rural areas. Although this decision has been delayed, it illustrates that it is highly unlikely that a new pharmacy would be considered in Charfield.

Food and retail facilities

Supermarket

20. The appellants in the 2013 Charfield Green planning appeal asserted that a major supermarket chain was interested in opening a supermarket in Charfield. Since this date most supermarkets have suffered financial difficulty and have closed many existing shops and plans for expansion have been reduced. The retailer who had expressed interest in a Charfield site has suffered **major** financial difficulties. Given the current retail market it is unlikely that Charfield would attract the attention of a supermarket provider. It is also not consistent with SGC's policies, which are against the development of retail centres out of town.

Individual Convenience & comparison shops

21. It is proving highly difficult for these types of businesses to thrive even in town centres such as Thornbury. Rural villages certainly do not attract and retain such businesses. Even where there is an existing High Street such as in Wickwar with suitable buildings, clustered together and with access to parking, these buildings have gradually been converted to residential use.
22. Over the past few years Charfield has lost shops including a separate retail unit run as a florist (now subsumed into the Tavern public house), a hairdressers (converted back to residential) and a second convenience store, which has closed entirely as a retail unit. One of the 4 units in the Manor Lane is used by a company as offices rather than as a retail outlet. These premises are currently for sale (November 2016) and it will be interesting to see what business finds this setting attractive enough to invest in.
23. Given the growth of Internet shopping and access by car to a number of medium and large shopping centres including Chipping Sodbury, Thornbury, Bristol, Gloucester and Bath, new retail businesses are not going to see Charfield as a good retail location, even with the potential of a doubling in its population.
24. The development of the village to date has meant that there is no easily recognisable village centre with the Memorial Hall and the rank of shops being quite distant from each other. There is no room for growth near the existing shops and certainly no obvious place to locate a new centre with associated parking.
25. It is also difficult to see where land for retail use will become available when land for housing development will be much more valuable.

Access to Major Employers

26. It is highly unlikely that major employers will locate to Charfield. These types of employers are finding that they can recruit more easily if they are located in a city. The appellants in the 2013 Charfield Green planning appeal asserted that Renishaw employees were in need of homes locally. However since that time Renishaw has conducted a survey of their employees (in connection with the Kingswood Neighbourhood Plan) that showed their workforce, of whom the majority are young, highly educated professionals, want to live in Bristol because of the lifestyle that the city offers. Charfield is not currently a significant home location for Renishaw employees. A company known to a local resident located from Bath to Bristol and found their ability to recruit the highly qualified staff they needed improved overnight – again these young professionals found Bristol more desirable than even Bath.

Public Transport

27. The existing bus service in Charfield is inadequate to use as a reliable form of transport for work, school or college. The local service has gradually been reduced over the years. Not only are there insufficient buses running at suitable and regular times but the remoteness of Charfield from major centres makes journeys lengthy and convoluted.
28. In general rural transport services are being withdrawn or reduced. As they are run by commercial organisations and public subsidies are being withdrawn the possibility of an improved and adequate service is remote. People moving into the village will continue to rely almost exclusively on their own cars. Development that is car dependent is not sustainable and constitutes a severe harm under the NPPF.
29. Although the Strategy states that development and the supporting infrastructure must go hand in hand, the Joint Transport Study (JTS) shows no plans to improve bus services for Charfield. There is merely a hope that additional housing “could support a case for rural bus improvements”. This position may be a realistic one but it does not make Charfield any more sustainable in the meantime.
30. Even assuming a significant upgrade to the bus service, the remoteness of Charfield would mean that a car journey to any urban destination would be significantly longer by bus and not an acceptable alternative.

Re-opening of the rail station

31. The re-opening of the rail station is discussed in both the Strategy and the JTS. However it is apparent that this is a very distant prospect. Given that the JTS clearly states that its overall transport plans cannot be funded without significant investment by the Government, it is hard to imagine that early funding, if any at all, will be forthcoming for the opening of a small station in a rural location attracting fairly minimal usage. It will not be a priority project. Realistically the re-opening of the station will provide some costly logistical problems with fast and slow trains running on the same tracks and with insufficient room at the protected site to allow for this new station.
32. In addition the Strategy itself sees rail transport as a minor feature to the region’s transport problems citing that only 2.1% of journeys to work are taken by rail (Source: Strategy from 2011 Census).

Community facilities

Dedicated

33. The Memorial Hall and the playing fields in Charfield are already at capacity at peak times (evenings and weekends). The building itself is not suitable for indoor sports activities such as badminton, gymnastics, etc. There is no room on the existing site to expand. As 1000 houses doubles the size of the population, there is logic to support additional sports/community hall facilities very early on in any expansion of the village. Without a new building, development brings a clear harm.

Schools

Primary School

34. Charfield Primary School is almost at capacity (September 2016) with availability in some classes only. The existing approved developments will put pressure on the school and any further developments will only increase that pressure over the Strategy period. Some expansion of the existing school is required immediately otherwise a number of primary school age children from the village will have to be bussed out to other areas. This is a major harm.
35. The existing school site could allow for some development including the addition of a second storey on part of the building but this would only accommodate 2 or 3 additional classrooms.

36. Given the 1000 houses doubles the size of the existing village, it is clear that a new school would be needed very early in the 20 year period the Strategy covers. The existing school site is not large enough to accommodate a new school. There is no protected site for a second school.

Secondary Schools

37. The majority of Charfield's secondary school age children and young adults attend schools in Wotton and Thornbury and travel by school bus. It is highly unlikely that the additional population would generate sufficient need for a secondary school in the village. The additional population of secondary school-age young people would therefore have to travel to these existing schools. This would be development that is car dependent and is contrary to the principle of sustainable development. This is a major harm.

Assessment of Sustainability based on Charfield Green Appeal

38. SGC's definition of sustainability in relation to Charfield has been misapplied and appears to defer to claims made during the appeal on the Charfield Green site. We have been able to show that many of the assertions made under that appeal by the appellants are now proven to be incorrect. The appeal was allowed because of the 5 year shortage housing supply meant that the harm of that particular development was out-weighed by it's benefits. However that decision does not mean that Charfield should continue to suffer from this one-off decision. The inspector recognised **harm** as well as benefit.

The cost of making Charfield a Sustainable Village

39. The Strategy sets out as fundamental to the growth proposed that the planning be "a joined up approach"⁴ with housing matched by the necessary support and facilities. We have addressed the situation with regard to existing services and facilities and what is needed to make the village less 'unsustainable' above. We have looked at each of the requirements in turn and aimed to put a cost on them based on comparative schemes:

Facility or service	Cost
Re-opening the railway station	New stations are expensive, and recent examples range from £2.2m for a single platform unstaffed station, to £12m for a full-length two platform station with overbridge and lifts. This means that they generally require significant numbers of daily journeys if they are to be justified. (Source: Rail Future, the independent campaign for a better passenger & freight rail network)
New Primary School	£6.2 m (Source: SGC Schools Forum report of 3 Dec 2015 -Cost to build Lyde Green Primary School)
Expansion of school	£2.1m (Source: SGC Schools Forum report of 3 Dec 2015 Cost to extend Barley Close Primary – four class extension, hall extension, nursery accom and replacement water services)
Improved bus service	£150k p.a per route (Source: SGC website – Consultation on 'Supported Bus Services – Re-tendering 2014')
Health centre	£1.2m to £2.5 m (Source: reported cost of Lynton, North Devon replacement surgery)
Sports/community centre	£2m (Source: Cost of new community centre art Cadbury Heath incorporating a café, bar, kitchen, sports hall and community resource rooms)

Strategic Development Locations

40. In the Local Plan 2013 Charfield was defined as a Rural Area with development potential of 24 houses as in-fill. Less than 23 months later it has become a Strategic Development Area able to sustain 1000 houses. It is now in the same category as the large towns of Thornbury and Yate.
41. Charfield is located at the very outer edge of the county and at the furthest distance from the County's existing urban and developed areas. The landscape in the neighbouring County continues to be very rural and access to Gloucester and Stroud as unsustainable as to Bristol, Thornbury and Yate.

⁴ 'Joint Spatial Plan – Towards the Emerging Spatial Strategy Document'

42. The rationale for including Charfield in this definition is very weak with the route to sustainability based on hopes that the growth of development will encourage infrastructure. This is not the established approach under the NPPF for identifying 'sustainable development'. The type of infrastructure that is required all requires public investment and planning. If SGC have no plans to fund this infrastructure, then the infrastructure will not come. We have addressed infrastructure in depth above.
43. Charfield is included under the title 'town expansions and new settlements' - neither of which it is. It is clear that SGC has had difficulty in framing the arguments to support Charfield's inclusion. Charfield is described as 'a key settlement in the north' – it is difficult to see how merely being the furthest settlement on SGC's northern boundary makes it 'sustainable' and key to development. It is this location that makes it a car-dependent village.
44. It is unlikely that investment for new infrastructure will be directed to Charfield when the new Garden Village at Buckover is going to be the focus for new infrastructure. While these villages may be relatively close, the link that is drawn in the Strategy is not a sustainable one – they are not so close that walking or cycling between them is a possibility and it is therefore concluded that any new development in Charfield will rely on infrastructure developed at Buckover – again non-sustainable development and car dependent.
45. The transport mitigations around Charfield are all car-dependent – improvements to the M5 junction 14 and a Park & Ride (at Almondsbury, eleven miles away). The rationale also indicated that "significant highway infrastructure may also be required" but there are no further descriptions of what these might be. Taken together, it is clear that SGC has accepted that more sustainable means of transport such as walking, cycling, bus and rail are not going to be significant options available to the 3000 or so new residents in the village. This is an acknowledgement that the village is and will continue to be a car dependent and therefore not 'sustainable development'.
46. It is clear that while the Strategy sets out a good fundamental plan for many parts of the region particularly for the urban areas and towns, its application to Charfield is not robust or logical.

Spatial Implications

47. The Strategy states that one of its strategic priorities is addressing unsustainable commuting patterns by aligning jobs and homes. It is difficult to see where Charfield being the furthest away from employment centres meets this priority.
48. Building in a rural area also conflicts with the strategic priority that "development encourages and does not restrict the benefits the natural environment can provide". Bringing more development to a rural area with no other significant development close by is totally at variance with maintaining the environmental quality of our part of the West of England.
49. It is also difficult to see how losing so much agricultural land does not contradict the principle that development does not result in a net loss to biodiversity.
50. Finally it is impossible to understand where the proposal of 1000 new houses in a village which relies totally on the car meets the following stated principle in the Strategy:

"Strategic development should be in locations which maximise the potential to reduce the need to travel or, where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, especially walking and cycling or be in places accessible to existing or new high quality public transport links."
51. We have already fully addressed that it is highly unlikely that a super-enhanced bus service will be forthcoming and it is not planned for in the JTS.

Strategy conflict

52. The proposal of 1000 houses in Charfield is totally in conflict with the principles of the Strategy which states "This approach recognises all aspects of sustainability including growth closest to the central areas and other parts of urban areas where people seek to travel for work, shopping and recreational needs." If a reason for Wickwar not to be included as a location in the spatial strategy because it is "less well related to major areas of employment than Yate and Coalpit Heath' then it is absolutely true that this statement applies *even more* to Charfield.

Comparisons with neighbouring communities

53. Looking at the consideration of our nearest neighbour, Wickwar as an area for inclusion into the spatial strategy it is really difficult to understand how the conclusion was so different. The landscape,

heritage and ecological value to the north, north west and east is Charfield and its environs. Charfield is further away than Wickwar to major areas of employment. Growth in Wickwar is seen as car-based which disqualifies it as a sustainable location whereas the same situation in Charfield does not. If the limitations of Wickwar prevent it being defined as a Strategic Development Location then these limitations apply to Charfield and the same conclusion drawn.

54. Compared to Wickwar, Charfield is a highly visible development from the escarpments around the valley. The doubling of size of the village will have a detrimental impact to visual amenity of the area.
55. In comparing these two villages we are not suggesting that Wickwar is suitable as a Strategic Development Location rather highlighting that Charfield is not either.

Conflict with the NPPF

56. It is already clear that the rationale to include Charfield as a Strategic Development Location under the principles of the Strategy is flawed and we will also set out that the Strategy in relation to Charfield contradicts the fundamental principles set out in the NPPF.

Roles and Characteristics of Different Areas -Core Planning Principle (NPPF para 17)

57. This core planning principle requires planners to retain a difference between built up urban areas and the countryside and the rural communities in it. Charfield is a small village of about 1000 houses and sits in an area of very pretty countryside with a mix of farmland and woodland. Charfield is set in a valley and is clearly visible from the escarpments for miles around. It is therefore a very important visual feature of the countryside. By doubling the size of the village in this rural setting threatens its definition as a rural community and it will appear as an incongruous urban development in the centre of a countryside setting. This is contrary to the NPPF principle and should be assessed as a severe harm.
58. Clearly the NPPF directs planning to be focused on urban areas. It would therefore be less harmful to direct the majority of these 1000 homes to existing conurbations such as Thornbury, Yate, Bradley Stoke, Chipping Sodbury and Filton. It has been demonstrated that much of the economic and social activity of Charfield residents (new and existing) has to be carried outside of the village and as a result Charfield is a **significantly less sustainable** location than these town locations.
59. This need for distinction between built up areas and countryside becomes more necessary with the growth that is planned in the region. Up till now SGC has managed very successfully to keep a balance. Urban areas and rural areas are both useful and have their specific roles to play. We all make use of them to enhance our lives and it is therefore important to retain the different environments.

Lesser Value land

60. Expansion of the size proposed also contradicts the core planning principle of selecting land for development that has lesser environmental value. Although no specific sites are allocated, the only land around Charfield is agricultural and is currently being farmed. Farming land is extremely important both in economic terms and as natural habitat. To develop such land for homes must be measured in NPPF terms as a significant harm.

Sustainable Transport

61. There is an obligation on local authorities under the NPPF paras 29 to 41 to promote sustainable transport. Development should facilitate the use of sustainable modes of transport and encourage the shortening of "journey lengths for employment, shopping, leisure, education and other activities". The expansion of a village, which is already a 'commuter village' and which relies on cars to get residents to places of employment, shopping, leisure, education and other activities and where there are no reliable sustainable modes of transport is contradictory to this obligation. Adding more houses to an unsustainable location cannot be the right approach. Again this must be rated as a major harm.

sustainable, inclusive and mixed communities

62. Because the village is unsustainable, it leads to a narrowing down of the community demographic. The majority of the village are working families with a lower than average number of people over 60. The village is a commuter village. The lack of services and facilities mean that people have to travel outside of the village for everyday activities. We can measure the impact of this by looking at the demand for affordable housing, as an example. The interest in living in Charfield among the population that requires affordable housing is very low: as of September 2016 there were 3898 applications on the Council's housing register of which 15 have chosen Charfield as their first choice of which only 6 are deemed in housing need. There are 978 households registered on Help to Buy

South of which 4 have stated they would like a shared ownership home in Charfield⁵. It is highly likely that this lack of interest in the village is due to the lack of reliable sources of transport other than a car and the general lack of facilities. This is not 'sustainable development'.

development in one village may support services in the next

63. NPPF para 55 encourages sustainable development in rural areas where it may enhance the vitality of the rural community. As we have argued above the increase of housing in Charfield will not result in an improvement in local services and facilities. All the villages located nearby are in reasonable proximity to Bristol, Gloucester, Thornbury, Wotton, Stroud, Nailsworth, Yate and Dursley and residents make use of these varied places to work, shop, for school, college and to socialise. There is no market for additional retail units in these villages or for increased use of public transport unless it became as convenient as travelling by car. An additional 1000 homes would only add more journeys in and out of the locality and does not increase the sustainability of the immediate rural community.

promoting healthy communities

64. NPPF para 73 requires the LPA to provide planning policies based on "robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision". We have identified that 1000 new homes will present major problems to existing facilities however there is no indication that SGC have plans that address the provision of the additional facilities required locally. As these require the allocation of land and possibly compulsory purchase then this has a major impact on how feasible the allocation of 1000 houses to the village actually is. SGC does not own any suitable land that could be used for these purposes and there is no indication that land has been earmarked for a new sports facility and additional community space. As existing resource is at capacity then this needs to be commissioned and in place fairly early in the timetable of building the proposed houses. Unless this is clearly addressed and resource made available this will introduce an additional severe harm to the benefit/harm equation.

climate change, flooding and coastal change

65. The directive from the NPPF para 95 requires LPAs to plan for development, which reduces greenhouse gas emissions. Transport accounts for around a quarter of UK greenhouse gas emissions⁶. It is therefore illogical that SGC have proposed 1000 new homes in an unsustainable location which will rely on the car to access the employment, shopping, leisure and education requirements of the 3000 or so new residents of the village. Again we would assert this is not sustainable development and provides another severe harm.

Why do people live in Charfield if it is so unsustainable?

66. We have made an overwhelming case that our village is unsustainable and it may appear that we don't like our village. However this is not the position – there is a strong sense of community in the village and many people choose to live here for many years.

67. People have different ambitions for where they choose to live – some like cities and towns; others prefer villages or even more isolated spots. People have moved in to the village because they like living in the countryside and country life – walking, horse riding, bird watching and nature. They largely accept that the infrastructure is not there and they will rely on their cars to access work, health, retail and education facilities. Until recently this had been an accepted way to live. The idea of 'sustainable development' is a fairly new concept. We are more aware that some lifestyles are not compatible with the limited resources and space in the UK. Modern life has seen a concentration of business into cities and towns, a concentration of health and education services into larger facilities meaning that villages are becoming unsustainable communities as they rely on cars to access these services.

68. Villages such as Charfield are therefore settlements that are becoming less 'sustainable' adding developments to these places cannot significantly change their 'unsustainable' status.

Sustainable Growth

69. We would acknowledge that as suggested in the Strategy for Wickwar that there is the potential for some non-strategic growth to support local services in Charfield. There is the opportunity for a number of new houses that over a period of time can be integrated into the community and which do not stretch the existing infrastructure and do not impact on the rural setting. Given that the village infrastructure (school, community centre) is at capacity then this growth must be small and measured

⁵ Source: Merlin Housing Society 16th September 2016

⁶ Source: Gov.UK Policy Transport Emissions

and it may be possible that up to 10 houses every few years is sustainable growth. This would fit in well with establishing a village for the 21st Century.

70. This growth would mean that the new housing is more likely to meet the needs of the local population including more self-build, more homes for local people whether homes for local people starting their own families or locals wanting to downsize in to suitable homes.
71. This would regenerate the village and balance the demographic in a sustainable manner.
72. The remaining houses should be concentrated in the existing urban developments where the principles of the Strategy are fully supported and future plans are already in place to develop the necessary infrastructure.

Interim Position

73. The timescale for the final Development Plan to be made is some significant time away and while this is beneficial to enable the correct consultations to be made and the necessary amendments to be agreed, it leaves particular villages especially Charfield open to continuing speculative planning applications. It is very important that SGC address this vulnerability robustly especially as we believe that the allocation of 1000 houses is incorrect against the yardstick of 'sustainable development'.
74. We would therefore hope that the statement that "the JSP is not expected to be a qualifying document for establishing planning permission in principle" will be strictly adhered to in the interim period between the consultation and the final made document.
75. There is a very widely held concern that this is just an open door to developers and it is important that any development is strategic and in accord with community consultation.
76. This is particularly pertinent to Charfield, as the residents have supported the creation of a Neighbourhood Plan. As this is the first one to be started in the County it is important to demonstrate that SGC values residents that seek to engage with the planning process.

Conclusion

77. We have clearly demonstrated that the Strategy in relation to Charfield is not justifiable. The village is and will remain an unsustainable development location. The Strategy and the JTS have no concrete plans to put the infrastructure needed to support a doubling in the population. The cost of the infrastructure needed is unlikely to be forthcoming with competition from so many other better-placed locations. Private funding for such infrastructure is not feasible.
78. Recognising the current need for housing and putting the principle of 'sustainable development' aside, a number of new houses in Charfield over the period may be feasible.
79. The definition of Charfield as a Strategic Development Location is incorrect and the allocation of up to 1000 houses is unsustainable development. In relation to Charfield the Strategy must be revised to reflect this conclusion.

Annex A
South Gloucestershire Local Plan Regulation 18 Consultation
Ranking of rural villages and settlements

17.4 The key services and facilities, set out in the table below, were utilised for this assessment.

Theme	Key Service and facility Assessed
Food and Retail Facilities	1. Defined Town Centres 2. Supermarkets 3. Individual Convenience (food) and Comparison (retail and services) Shops
Health Facilities	4. GPs 5. Pharmacies
Community Facilities	6. Dedicated Community Facilities 7. Libraries (Static and Mobile) 8. Post Office 9. Public House
Education Facilities	10. Secondary School 11. Primary School
Access to Major Employers	12. Employers with 100+ Jobs 13. Defined Town Centres
Superfast Broadband Access	14. Superfast Broadband Access
Public Transport Access to Major Areas (Defined Town Centres & Cribbs Causeway)	15. Daily service with at least one before 9am and after 5pm 16. Weekend Service

17.5 Each of the 51 villages and settlements in South Gloucestershire, Yate/Chipping Sodbury and Thornbury were awarded points based on their sustainable access to the range of key services and facilities. Villages and settlements which have a good range of services and facilities within walking and cycling distance, have broadband and public transport access routes to a major centre, have the highest scores in this assessment.

Sustainable Access to Key Services and facilities Ranking of Rural Settlements and Villages		
Access Ranking to Key Services and facilities	Settlement with potential land Outside of the Green Belt	Settlement with potential land within the Green Belt
Excellent Access	Yate Thornbury	Yate Thornbury Winterbourne
Good Access	Frampton Cotterell Coalpit Heath Charfield Engine Common	Frampton Cotterell Alveston Coalpit Heath Wick Almondsbury Hambrook Pilning Pucklechurch
Acceptable Access	Falfield Marshfield Severn Beach Wickwar Cromhall (Bibstone & Townwell) Easter Compton Hawkesbury Upton Oldbury-on-Severn Rangeworthy Old Sodbury	Marshfield Shortwood Iron Acton Tockington Bridgegate Bitton Easter Compton Oldbury-on-Severn Redwick Rangeworthy Siston Westerleigh Old Sodbury
Poor Access	Tytherington Badminton Horton West Littleton Rockhampton	Hallen Olveston Tytherington Upton Cheyney Rudgeway Aust Hortham Village Latteridge Old Down Cold Ashton Littleton upon Severn
Minimal Access	Acton Turville Hill	Elberton Doynton Hinton Dyrham

**South Gloucestershire Local Plan
Regulation 18 Consultation
Definition of Sustainable Access**

Tier 1 - Excellent access to Services and Facilities.	Score 33 – 40	Settlements in this tier have the largest range and type of retail & food shops, health, community, education and major employment facilities and services within walking and cycling distance. Settlement population has option of superfast broadband access and good public transport links to other major centres. Based on sustainable access to services and facilities a highly preferable settlement location.
Tier 2 - Good Access	Score 25 – 32	Settlements have a balanced range of services and facilities within walking and cycling distance, for some settlements this will include health care facilities. Some settlements have access to multiple retail, food shops or major employers. Settlement likely to have access to broadband and good public transport links to a major centre. Some settlements lack good walking and cycling access to one particular type of facility or service, often local shops (non-food) or permanent library.
Tier 3 - Acceptable Access	Score 17 – 24	Good walking or cycling access to at least two types of facilities and services (e.g. community facilities and education). Many settlements lack walking and cycling access to multiple retailers, food shops and employers. Many of these settlements unlikely to have access to health facilities. Any settlements with poor access to services and facilities in this ranking will often have good broadband and public transport access.
Tier 4 - Poor Access	Score 9 - 16	Many of these settlements have good access to a particular type of facility or services such as certain education facilities and community facilities. However, settlement will not have access to a good range of facilities and services. Many settlements do not have both access to both facilities & services, and broadband or public transport to major centres.
Tier 5- Minimal Access to Services and facilities	Score 0 – 8	Deficient in services and facilities in many of the categories, lacking any access to at least 3 to 4, from retail and food shops, health, education, community facilities and major employers. Many lack reasonable public transport access to other centres and broadband access.