

Statement of Common Ground

**B&NES Core Strategy – Alternative Green Belt
Site at Hicks Gate**

**RPS on behalf of Crest Strategic Projects and Key Properties
and
Bath & North East Somerset Council**

February 2014

1.0 Introduction

- 1.1 In his note of 3rd January 2013 ([ID/44](#)) the Inspector outlined his requirements in terms of Statements of Common Ground that he would like to be prepared in advance of his preparation for the hearings in March/April 2014. He has also confirmed the dates and scope of coverage for these hearing sessions.
- 1.2 The Inspector has requested that the Council and the various owners/developers/promoters of the Green Belt sites proposed for allocation in the November 2013 Amendments should prepare Statements of Common Ground relating to delivery and environmental impact of those allocations as per the Council's proposals in the following revised policies:
 - B3A Land Adjoining Odd Down, Bath
 - B3B Land Adjoining Weston, Bath
 - KE3A Land Adjoining East Keynsham
 - KE4 Land Adjoining South West Keynsham
 - RA5 Land at Whitchurch
- 1.3 The deadline for submission of hard copies of these Statements of Common Ground to the Inspector is noon on 14th February 2014; the Council has a working deadline of **7th February** in order to ensure timely completion.
- 1.4 The Inspector has specified in ID/44 what the Statements of Common Ground, should include (but not be limited to), this template covers these issues accordingly:
 - Delivery: Availability/start on site/likely annual completions (assuming that the Core Strategy is adopted by Autumn 2014).
 - Evidence already submitted relating to the main documents, including the evidence from landowners/developers included in the Core Documents or submitted with representations to the November consultation.
 - The Statement of Common Ground should make clear which parts of evidence are agreed and where there is disagreement briefly the main reasons for that disagreement.
- 1.5 The Inspector has suggested that the Statements of Common Ground may need to involve parties not currently active in the Examination, but they will only have a right to be heard if they have already made representations at an appropriate opportunity. The Council considers that this relates primarily to landowners who have not previously been involved in the examination process prior to Nov-Dec 2013.
- 1.6 In addition, Statements of Common Ground between the Council and other promoters in relation to their suggested alternative or enlarged proposals are welcomed by the Inspector as separate submissions. This Statement of Common Ground relates to an alternative proposal.

2.0 Description of the site

- 2.1 The Hicks Gate site occupies a strategic location on the south east edge of Bristol on the A4 corridor; the main highway linking Bristol and Bath. The site lies within the Green Belt.
- 2.2 The site promoted by Crest Strategic Projects and Key Properties Limited occupies land both north and south of the A4 and comes under the jurisdiction of two local authorities – Bristol City Council (BCC) and Bath & North East Somerset (B&NES). A range of uses surround the site including employment, recreation, community, leisure, retail and public parkland uses and facilities. A site location plan is attached to this statement that indicates the land promoted by Crest Strategic Projects and Key Properties Limited for development.
- 2.3 The Bristol-Bath Railway line bounds the site to the north while the eastern boundary of the site is formed by the A4174 (Bristol Ring Road), the Hicks Gate Roundabout and agricultural fields. The southern boundary of the site is delineated by the Stockwood Road leading to a large public park (Stockwood Open Space) and a Local Nature Reserve. The south eastern boundary is defined by a series of field boundaries with Stockwood Hill further to the southeast. A Park & Ride facility (operated by Bristol City Council), Long Fox Manor, Heath Farm, Broomhill Nurseries and the residential area of Broomhill form the western boundary of the site. St. Brendan’s College is located further to the west.
- 2.4 RPS confirms that there are no landownership constraints that would affect the implementation of a comprehensively planned urban extension. Crest Strategic Projects together with Key Properties Limited control the vast majority of land within the site boundary and are working jointly together to promote the proposed urban extension. The parties wish to develop the site in a comprehensive manner.
- 2.5 The majority of the site is in agricultural use however there are a number of other uses within the site boundary. These include Brislington Football Club’s and Brislington Cricket Club’s playing facilities, Oakleigh House (a listed Georgian country house), Hicks Gate Farm, Wyevale Garden Centre, and Bristol City Council Allotments.
- 2.6 In a wider context, the site is located 5.3 km from Bristol Temple Meads Station (from the B&NES/Bristol administrative boundary on the A4). In addition there are high frequency bus services linking the site to the city centre (the A4 is a showcase bus corridor) whilst pedestrian access towards central Bristol is facilitated via footways alongside the A4.
- 2.7 See map included in **Appendix 1**.

3.0 Delivery

3.1 The table below is extracted from the 2010 Statement of Deliverability by RPS (CD4/UE2) and updated to reflect the slippage in timescales. As such it represents RPS view of the delivery programme.

Hicks Gate Build Programme Key Delivery Targets	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
		31 Mar	31 Mar	31 Mar	31 Mar	31 Mar	31 Mar	31 Mar	31 Mar	31 Mar	31 Mar
1. Outline planning approval	January										
2. Reserved matters approvals	June										
3. Conditions discharged	June										
4. S38/278 technical approvals	August										
5. Infrastructure site start	September										
6. Remaining conditions discharge	December										
7. Units Complete		0	50	150	300	500	700	900	1,150	1,350	1,500
8. No. of developers onsite		1	1	3	3	4	4	4	5	4	3

4.0 Key relevant evidence

4.1 Key evidence prepared by the Council in relation to land at Hicks Gate includes:

Key evidence submitted 2011-2012	<ul style="list-style-type: none"> • South East Bristol Urban Extension – Key References CD6/O3 • Topic Paper 2 – Overall Strategy CD6/S3 • Previous iterations of SHLAA • Green Spaces Strategy CD4/ENV3
Additional evidence to support proposed changes Submitted March -Sept 2013	<ul style="list-style-type: none"> • Hicks Gate Development Concept Options Report CD9/CO8 • Green Belt Review Stage 1 CD9/E2 • Affordable Housing Viability Study CD9/H1 • Flood Risk: The Sequential and Exception Tests Update CD9/FR3 • Infrastructure Delivery Plan CD9/I1 • Preliminary Ecological Survey and Assessment: South East Bristol Urban Extension: Location Option 2 – Hicks Gate CD9/E4 • Transport Evaluation Report: Main Report (CD9/I2/1); Appendix I: Hicks Gate, Keynsham Evaluation (CD9/I2/10)
Documents associated with the	<ul style="list-style-type: none"> • Bath and North East Somerset – Community Infrastructure Levy: Strategic greenfield allocations –

<p>Core Strategy strategic site allocation</p> <p>Submitted Nov 2013</p>	<p>viability testing CD10/E7</p> <ul style="list-style-type: none"> • Renewable Energy Assessment for B&NES Green Belt sites: Assessment CD10/E16 • Valuing people, place and nature – a Green Infrastructure Strategy for B&NES CD10/E17 • Strategic Housing Land Availability Assessment (SHLAA) CD10/E19 • B&NES 51
<p>Assessments</p>	<ul style="list-style-type: none"> • Sustainability Appraisal Annex L – Locational Alternative Appraisal Matrices CD9/A1/5 • Sustainability Appraisal Matrices (Annex O) CD10/A1/3 • Previous iterations of the SA

4.2 A ‘Statement of Deliverability’ (CD4/UE2) in respect of the Hicks Gate site was prepared on behalf of Crest Strategic Projects and Key Properties in January 2010 and was submitted to Bath and North East Somerset Council and Bristol City Council to assist both Councils with the preparation of their respective Core Strategies. The statement comprises the following sections:

- Introduction
- Planning Background
- Evidence Base Analysis
- Development Proposals
- Sustainability Appraisal
- Conclusions

4.3 A masterplan document is included as part of the Statement of Deliverability which demonstrates how Crest/Key Properties consider the land could be brought forward for mixed use development. The Statement of Deliverability is also supported by a number of technical submissions (already supplied to the Inspector). The technical evidence submitted is agreed to contain information relevant to the site but it has not been commented on formally by the Council, considering that the principle of development in this broad location is not supported by the Council and the site does not form part of the spatial strategy in the Core Strategy.

4.4 A Sustainability Appraisal of development at the site was prepared by the Council in the context of the potential Significant Changes to the Core Strategy (November 2010) (CD4/A10). An alternative assessment by Crest/Key Properties of how the proposed development of the Hicks Gate site performs against the criteria within the Council’s original Sustainability Appraisal is set out in Chapter 5 of the Deliverability Statement.

5.0 Summary of Agreed Matters

5.1 The following are matters agreed between the parties:

- 5.2 The appraisal of the accessibility of the Hicks Gate site as part of the Core Strategy (Spatial Options) appraisals as referenced in paragraph 5.4 of the Sustainability Statement is agreed: *'The Hicks Gate development in option B particularly had good access to Bristol facilities and services due to good public transport accessibility.'*
- 5.3 In its report to Council dated 15 September 2011 (CD5/24) and within the context of the housing requirement and housing supply at that time Hicks Gate was considered by the Council's Officers to be the preferred location for inclusion as a long-term contingency location for up to 700 dwellings when compared to three alternative Green Belt locations. The report to Council states:

"Hicks Gate area has a critical role in the Bristol-Bath Green Belt maintaining the separation of Keynsham and Bristol. Development at this location would significantly impact on this green belt gap. However, by keeping development back from the ridge-line the highest landscape impact can be significantly avoided. This could also maintain the principle of the green belt gap" (CD5/24 page 29)

- 5.4 However, the inclusion of this as a Proposed Change to the Submission draft Core Strategy was rejected by the Council. The Council has subsequently pursued a spatial strategy that seeks to release land from the Green Belt at two of the three alternative locations previously assessed in CD5/24 (Whitchurch and Odd Down), and other sites at Bath and Keynsham.
- 5.5 Relevance of the Bristol City Core Strategy: it is agreed that the adopted Bristol Core Strategy (June 2011) is relevant to the B&NES Core Strategy having particular regard to the following:

The provisions of Policy BCS6 which acknowledge that proposals for urban extensions in the Green Belt may come forward via the development plans of neighbouring authorities and the City Council's willingness to work with neighbouring authorities on the accommodation of any appropriate proposals:

'Proposals for urban extensions in the Green Belt beyond Bristol City Council's boundaries may emerge through the development plans of neighbouring authorities. If appropriate proposals come forward the Council will continue to work with the adjoining authorities to consider the impact on existing areas, to assess infrastructure requirements and to ensure integrated and well-planned communities are created to the benefit of existing and future residents.' (Policy BCS6)

- 5.6 Identification of the Hicks Gate site as an appropriate contingency site for development within the Bristol City Council administrative area as set out in Policy BCS5 (delivering up to 800 homes in the Bristol City area if required).

6.0 Summary of Matters in Dispute

- 6.1 There continues to be dispute between the parties on the following matters:
- 6.2 Crest Strategic Projects and Key Properties Ltd believe that the Core Strategy is unsound in its current form, on the basis that the housing target proposed within the plan fails to address the level of need and demand within B&NES over the plan period. The Council disagrees with this view and it is not consistent with the Inspector's conclusions in ID/44. There is also disagreement regarding the lack of flexibility in the strategy and failure to plan adequately for contingency locations.
- 6.3 Crest and Key Properties position that the Hicks Gate site represents a key strategic site that would sustainably cater for housing and economic demand and need generated within B&NES and the Bristol sub-region.
- 6.4 Crest Strategic Projects and Key Properties Ltd critique of the Council's Sustainability Appraisal of the draft Core Strategy (CD4/A10) as set out in Chapter 5 of the Statement of Delivery (CD4/UE2).
- 6.5 Whilst the Council is of the view that the Core Strategy as amended is sound, should the Inspector conclude that it is unsound in respect of either the level of housing and economic development it plans for or the degree of flexibility required there is disagreement between the parties that the allocation of this site now provides the solution to these aspects of unsoundness.
- 6.6 The Council is of the view that the Core Strategy as amended enables the identification of a 5 year land supply with a 20% buffer, which also provides significant flexibility and choice of sites. Amended Policy DW.1 states that the Core Strategy should be reviewed at around five yearly intervals, whereupon changes would be made as necessary to ensure that both the objectives are being achieved particularly the delivery of the housing and work space targets to ensure that there remains a flexible supply of deliverable and developable land, and that the Core Strategy is planning for the most appropriate growth targets. The Core Strategy as amended no longer refers to 'contingency'. Crest Strategic Projects and Key Properties do not support this position and contend that greater flexibility is required (including through the provision of contingency sites), and that the terms of a review are not sufficiently robust. If the Council's position is supported by the Inspector, Crest Strategic Projects and Key Properties acknowledge that in the context of the next review of the Core Strategy the officer report is useful in helping to determine the most appropriate Green Belt locations for consideration, without prejudicing the Council's reassessment of options that would be needed.

7.0 Declaration

- 7.1 The content of this document is agreed for the purposes of the B&NES Core Strategy hearing 2014.

Signed on behalf of Crest Strategic Projects and Key Properties:



Position: Technical Director

Date: 12/2/14

And

Signed on behalf of Bath & North East Somerset Council:



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Position: Planning Policy Team Leader

Date: 13th February 2014

Appendix 1: Site Plan

HICKS GATE: RED LINE PLAN

