

#### HICKS GATE, BRISTOL

STATEMENT OF DELIVERABILITY

PREPARED ON BEHALF OF CREST STRATEGIC PROJECTS AND KEY PROPERTIES

**JANUARY 2010** 

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- 1.1 This Statement has been prepared on behalf of Crest Strategic Projects and Key Properties. Its purpose is to assist evaluators tasked with assessing the site specific considerations relating to a mixed-use development proposal at Hicks Gate, Brislington.
- 1.2 The evaluation of the site has been carried out by professionals in relevant disciplines who form the consultant team for Hicks Gate. They include:
  - RPS (planning and urban design);
  - Peter Evans Partnership (transport and access);
  - Arup (engineering, including flood risk and surface water drainage, noise and vibration, ground conditions and utilities);
  - Waterman Group (ecology, archaeology, agricultural land);
  - Cooper Partnership (landscape); and
- 1.3 These consultancies are hereafter referred to as the Hicks Gate Team.
- 1.4 Section 2 of this Statement presents the planning background relating to the site tracing its policy origins from the DRSS through the Core Strategy processes for both Bristol and Bath and North East Somerset (BANES). Comprehensive representations have been made to both Local Authorities throughout every stage of the Core Strategy processes. It is important to read this submission in conjunction with the up to date representations made in respect of the Bristol Publication Core Strategy and BANES Core Strategy Spatial Options Paper. The deadline for both submissions is 15 January 2010 and it is therefore helpful that a coordinated response to both authorities can be provided. This Statement seeks to provide the "evidence base" to both authorities underpinning the content of the representations. The representations are reproduced for convenience as **Appendices 1** and **2** of this Statement.
- 1.5 Section 3 addresses the constraints analysis that has been undertaken since the start of the RSS process in 2006. The analysis presented (and contained as appendices to this statement) provides an up to date technical analysis of constraints and opportunities at Hicks Gate.

- 1.6 Having considered the constraints in detail, section 4 examines the work that RPS has produced to develop a new masterplan **(Appendix 3)** that provides a sustainable mixed-use development proposal that sits in harmony with the landscape and ensures a development that maximises the potential of site, increases public use of open space and enhances areas of biodiversity.
- 1.7 In section 6 a Sustainability Appraisal of the proposal is provided and in Section7 conclusions are drawn.

# 2. PLANNING BACKGROUND

- 2.1 The analysis is structured to provide a review of the planning history and assessment of the key policy issues. National planning policy guidance recommends that where new development is needed development should be undertaken with the objective of achieving sustainable communities, and the best means is through mixed-use development. The evidence contained in this statement demonstrates that Hicks Gate is suitable for development in the form of a mixed use proposal, and represents an opportunity to establish an integrated and sustainable community at Bristol.
- 2.2 Prior to the preparation of the RSS, there is little relevant planning history affecting the site, whether it is related to development control or the development plan. The site has historically been identified in the Bristol/Bath Green Belt and there has been no strategic context for the review of the Green Belt until now. There are a number of Local Plan designations affecting the site, particularly within Bristol City (such as the Wildlife Network Site, Conservation Area and Historic Parks and Gardens) that are referred to in this Statement.

# Policy Timeline

- 2.3 The following section sets out the policy context for the Hicks Gate site as it has emerged since the draft RSS was published in June 2006.
- 2.4 The table below provides a summary of the changes to the RSS insofar as the housing requirement within and adjacent to the Bristol urban area.

	Draft RSS	Panel Report	Proposed Modifications
Total requirement in Bristol City	28,000	30,000	36,500
SE Bristol Area of Search element	0	0	1,500
Total requirement in BANES	15,500	18,800	21,300
SE Bristol Area of Search element	6,000	6,000	8,000

# Draft RSS (June 2006)

2.5 The Hicks Gate area falls within DRSS Area of Search B which seeks to provide 6,000 homes in the broad area extending from the Bristol-Bath mainline railway over the A4 and as far south as Whitchurch.

- 2.6 Provision of 6,000 homes at Hicks Gate has never been, or ever will be achievable. It is therefore accepted that a combination of sites will be required to meet the 6,000 dwelling target. The Area of Search is extensive, however, there are only two viable locations for development; land at Hicks Gate and land at Whitchurch. The land between is the Stockwood Vale which is heavily constrained by steep topography. To that end, there is little physical relationship between Hicks Gate and Whitchurch.
- 2.7 The DRSS inset diagram for the West of England highlights the need for major transport improvements in South Bristol. An arc of transport improvements extends from the Hicks Gate roundabout around south Bristol through to the A370 on the western side of the City. This arc is commonly known as the South Bristol Ring Road and has over time been split into three distinct phases. One of the key objectives for the RSS in Bristol is the regeneration of South Bristol.
- 2.8 The South Bristol Ring Road has been under consideration for a number of years, including through the Greater Bristol Strategic Transport Study. Current plans by the West of England Partnership envisage a lower standard route linking Long Ashton to Hartcliffe with a combined rapid transit route and single carriageway road. The aim now is to improve the accessibility of South Bristol to assist regeneration rather than provide a new strategic transport link.

# South West RSS Examination (April-July 2007)

- 2.9 In the lead up to the Examination, the South West Regional Assembly (SWRA), BANES and Bristol City Council submitted a wealth of evidence to support their recommendations to the Panel. The three most relevant documents are:
  - SWRA Urban Extension Evidence Base Review (February 2007)
  - Capacity Appraisal Studies Proposed Urban Extensions South East and South West of Bristol. Bristol City Council (January 2007)
  - BANES Urban Extension Environmental Capacity Appraisal (October 2006)

# SWRA Urban Extension Evidence Base Review (February 2007)

2.10 The Arup report effectively comprises an appraisal of the existing evidence base. It broadly commends the work of the Colin Buchanan Green Belt Review and notes that most of the urban extension options will inevitably result in most harm to the Green Belt. The report highlights that difficult decisions in relation to the Green Belt are 'practically inescapable' given the inherent sustainability of the locations being assessed. The Hicks Gate site falls within "Land Cell H" and the report confirms that it has the highest potential impact on Green Belt harm, acknowledging that coalescence of Bristol with Keynsham is a key concern. Beyond that, the land cell is relatively unconstrained and it is important to stress that the Hicks Gate area forms only a small portion of the cell being considered. If all of that cell were to be considered for development then clearly it would be right to raise concerns regarding the coalescence of Bristol and Keynsham.

Capacity Appraisal Studies of the Proposed Urban Extensions South East and South West of Bristol. Bristol City Council (January 2007)

- 2.11 This report provides an assessment of the development potential of urban extension land within Bristol City. The assessment presents a useful summary of the issues that will undoubtedly need to be addressed (such as providing links to existing communities and balancing that with the need to ensure relative self containment).
- 2.12 The development team broadly agrees with the Council's assessment of potential development land within Bristol City. Indeed, the Council's analysis accords with our own analysis of development potential. To the south west of Bristol, there are few real opportunities for development despite the fact that the DRSS promotes 1,500 homes within Bristol as part of the wider Area of Search. Notably, in some of the areas that Bristol identified as being not appropriate for development, applications are now in for major developments such as the new Bristol City Stadium south of the Long Ashton Park and Ride.

# BANES Urban Extension Environmental Capacity Appraisal (October 2006)

2.13 Similar to the Bristol City exercise, the BANES appraisal provides a useful and well reasoned summary of the issues affecting the Hicks Gate area. Again, the

areas identified by BANES as being potentially suitable for development broadly accord with our own analysis. A number of key opportunities are identified for the Hicks Gate that are referred to in Section 4 of this Statement.

- 2.14 It is important to stress that we have not simply sought to adhere to the recommendations of the two Councils, but that following our own constraints analysis there is broad consensus in terms of the areas deemed suitable for development and opportunities that exist.
- 2.15 RPS appeared at a number of sessions during the Examination on behalf of Crest Strategic Projects. The most relevant submission was a specific response made to the Panel request for further information relating to urban extensions, their capacity and delivery.
- 2.16 Barton Wilmore also submitted a response to the Panel's request relating to capacity and delivery issues at Whitchurch. Paragraph 2.7.15 of the response acknowledges that the delivery of the South Bristol Ring Road is an essential piece of infrastructure required to relieve traffic in south Bristol and aid regeneration. It goes on to note that the full development requires construction of the whole of the South Bristol Ring Road. If it is right that Barton Wilmore assumed that circa 1,600 dwellings might be built by 2018 but that further homes are dependent on the Ring Road being in place, it is clear that even if the capacity of that location demonstrates that 6,000 homes can be accommodated, it is highly unlikely that they will be completed by 2026 given the uncertainty over the delivery of the third phase of the Ring Road.

# Bristol City Core Strategy Issues and Options Paper (July 2007)

- 2.17 The Issues Paper sought to provide an initial response to the emerging requirements of the draft RSS. It presents three spatial options to meet both the housing and economic needs of the City. The options highlight potential urban extension sites and in the context of the south east Bristol Area of Search, only land at Whitchurch is identified on plan.
- 2.18 In respect of economic growth, the paper refers to the Employment Land Study which identifies a need for 24.5 hectares of new industrial and warehousing land in South Bristol. Page 49 of the Paper states that:

"The Employment Land Study suggests that new land is required for industrial and warehousing purposes. This could be provided by a new site in south Bristol in the area around the Brislington Trading Estate. This would help meet existing and future demand for this type of employment on sites which suit modern business by being close to the major road network within the City with few operational constraints experienced when close to residential properties".

2.19 This contention has broadly been followed throughout the preparation of the Bristol City Core Strategy.

# BANES Core Strategy Launch Document (September 2007)

- 2.20 Similar to Bristol, BANES launched its Core Strategy in 2007. Under the Keynsham section of the document reference is made to the urban extension south east Bristol. It is interesting that the document confirms that there is an increasing functional relationship between Keynsham and Bristol shown by the increasing integration in service use between the two areas. It notes the opportunity for Keynsham to benefit from its close proximity to the proposed urban extension.
- 2.21 The document highlights the two potential locations at Hicks Gate and Whitchurch and notes their potential for development.

# **RSS Panel Report (December 2007)**

2.22 Paragraph 4.1.58 of the Panel Report concludes that the draft RSS proposals for urban extensions in the West of England HMA are soundly based. Notably, the Panel accepts that there may be scope within the Areas of Search to exceed the draft RSS targets, but considers that it would not be wise to assume any higher output within the Plan period. Instead, the Panel looks to identify other potential locations for growth and highlights in particular the scope for provision at Yate and Keynsham. The analysis of the Keynsham opportunity is interesting (paragraphs 4.1.64-4.1.65) insofar as it recognises the inherent sustainability of the location.

# Bristol City Core Strategy Preferred Options (January 2008)

2.23 The Preferred Options was prepared before the publication of the Panel Report. The Spatial Option Key Diagram on page 16 is made clearer insofar as the Area of Search south east of Bristol is more in tune with the key diagram in the RSS. It also notable that Phases 1 and 2 of the South Bristol link road are shown on the diagram, but there is no reference of Phase 3. Since the entirety of the 6,000 home area of search requirement fell within BANES, there was little opportunity for Bristol to consider housing growth in its part of Hicks Gate.

- 2.24 Paragraph 6.22 of the Preferred Option Document does however set out that new industrial and warehousing land should be provided in two locations south of Bristol:
  - In the area to the east of the Brislington Park and Ride (approximately 15 hectares); and
  - In the area around the existing Novers Hill (approx. 5-10 hectares).
- 2.25 Again, this is in line with the evidence base and advice in the ELS.

# **RSS Modifications (July 2008)**

- 2.26 The Secretary of State sought to make further increases to the overall provision for Bristol City, BANES and the wider West of England HMA. The requirement in Bristol City increased from 30,000 as recommended by the Panel to 36,500 homes, whilst BANES was subject to a more modest increase of 2,500 homes. The wider Bristol SSCT is expected to provide 87,000 homes and 92,000 jobs by 2026.
- 2.27 The Modifications make significant changes to the south east Bristol Area of Search that has implications for both authorities. The overall Area of Search is increased from 6,000 homes to 9,500 homes and of that total, 1,500 homes are required to be provided within Bristol City. It is clear that there are few opportunities within Bristol City to accommodate 1,500 homes, except for the opportunity presented at Hicks Gate.

# Bristol City Core Strategy Preferred Options Review (February 2009)

2.28 The publication of the RSS Modifications naturally caused Bristol City Council some difficulties if it was going to seek to continue with the Preferred Option as presented in January 2008. To that end, the City Council took a pro-active stance and released the Preferred Options Review Paper. The Paper provides

an analysis of the urban extension to the south east of Bristol and seeks to provide two potential options that provide a combination of industrial and warehousing use and a proportion of the 1,500 new homes.

#### Bristol City Draft Development Principals (June 2009)

2.29 The Preferred Options Review Paper of February 2009 sought only to consider the spatial elements and impacts of the RSS. The City Council therefore produced a draft Development Principals Document that focused on other Core Strategy policies.

#### RSS "The Way Forward" Statement (25 September 2009)

2.30 Although it is disappointing that there is further delay in the publication of the RSS, in many respects the Government Office statement is helpful insofar as it confirms that the Government is seeking to appraise only those elements of the areas of search that were added or amended in the 2008 Proposed Modifications. This has subsequently been confirmed in the GOSW letter of 21 December. In that sense, the most significant impact would seemingly be that the published RSS reverts back to the DRSS figure of 6,000 homes in the SE Bristol Area of Search. It is however difficult to envisage the 9,500 homes figure going down significantly as it represents an inherently sustainable location over other alternatives. It might reasonably be assumed that the Government Office will be focusing its efforts on some of the other Proposed Modifications Areas of Search such as that at Keynsham and other similar "360 degree" Areas of Search.

# **BANES Spatial Options Paper (1 October 2009)**

2.31 Despite the decision to adhere to the overarching DRSS requirement of 15,500 homes, the options presented in the Spatial Options Paper bear little resemblance to the DRSS distribution (Option 2 is the favoured approach):

	DRSS	BAN	NES
		Option 1	Option 2
Bristol Urban Extension	6,000	3,650	3,300
Bath Urban Extension	1,500	8,000	7,000
Bath Urban Area	6,000	8,000	7,000
Rural Areas	2,000	1,500	1,900
Midsomer Norton/Norton Radstock	0	1,000	1,700
Keynsham	0	1,700	1,600
Total	15,500	15,500	15,500

2.32 To that end, the representations submitted by RPS (Appendix 1) contend that the approach is unsound for a host of reasons and that the Council has not properly tested the RSS spatial distribution.

#### **Bristol City Publication Core Strategy (November 2009)**

2.33 The Publication version seeks to make provision for 30,000 new homes in the period to 2026 and provides contingencies should the requirement increase in line with RSS Modification rates (36,500 homes). The Council has also dropped the identification of the industrial and warehousing land at Hicks Gate without reasonable explanation. The RPS representations are provided as **Appendix 2**.

#### Housing Land Supply

2.34 Against the RSS figures, the supply position for both authorities is as follows.

		BANES	
	DRSS	Panel Report	Proposed Modifications
RSS to 2013	5,425	6,580	7,455
Completions 2006-2008	903	903	903
Five Year Requirement	4,522	5,677	6,552
Supply Trajectory to 2013	3,260	3,260	3,260
Shortfall	1,262	2,417	3,292
No of years supply	3.60 years	2.87 years	2.49 years

		<b>BRISTOL CITY</b>	
	DRSS	Panel Report	Proposed Modifications
RSS to 2013	9,800	10,500	12,775
Completions 2006-2008	4,463	4,463	4,463
Five Year Requirement	5,537	6,037	8,312
Supply Trajectory to 2013	7,919	7,919	7,919
Surplus/Shortfall	+2,582	+1,882	-393
No of years supply	7.42 years	6.56 years	4.76 years

- 2.35 The supply figures are not subject to any detailed scrutiny and are taken directly from the Council's own 2007/8 AMRs. It is clear that BANES in particular has to consider how the existing shortfall will be met in the short, medium and long term. At present, there is no timetable for the publication of the SADPD so it could reasonably be assumed that the Council will be reliant on the strategic sites brought forward through the Core Strategy.
- 2.36 RPS has reiterated throughout its submissions to both Bristol and BANES that development at Hicks Gate should be considered comprehensively devoid of local authority boundaries. The issue of where employment land and housing should be located within Hicks Gate should not be dependent on specific needs and requirements within each authority area; the needs are related to the Bristol SSCT and it on that basis in which Hicks Gate can make a meaningful contribution. Although the RSS requires 1,500 homes to be developed within Bristol at Hicks Gate there is nothing to say that if joint working arrangements existed between Bristol City and BANES that those homes could not be developed within Bristol at the most appropriate location adjacent to the trading estate. This is the context in which RPS has sought to promote an illustrative masterplan.

# 3. EVIDENCE BASE ANALYSIS

- 3.1 Since the policy position started moving forward positively through the RSS in 2006, the team has progressed a number of technical studies to inform an emerging Masterplan. A comprehensive set of technical reports has been prepared assessing the constraints and opportunities affecting the site. This Statement provides the opportunity to synthesise the comparative analysis to demonstrate the suitability of Hicks Gate for the development proposed. The technical studies are appended to this Statement.
- 3.2 The proposals have got to the stage where all significant technical constraints are known. This has led to the production of two constraints plans (Appendix 4) that deal with unavoidable hard constraints; the second one deals with constraints that do not present insurmountable issues.

#### Location

- 3.3 The Hicks Gate site occupies a strategic location in south east Bristol on the A4 corridor; the main highway linking Bristol to Bath.
- 3.4 In respect of land within the promotion area that is not directly controlled by either CSP or Key Properties, whilst the cricket ground is not under direct control, approaches have been made to the club and they are generally receptive to integration within the Masterplan proposals or a potential move elsewhere. There has been similar dialogue with Wyevale Garden Centre who has consistently expressed interest in the emerging proposals. Bristol City Council controls the allotments south of the A4; the Masterplan proposals seek to retain both the garden centre and these facilities.
- 3.5 There are a number of uses located between the residential suburbs of Brislington and the site; an important issue for the masterplan to address will be linking the site back to the existing community. The large Brislington Trading Estate forms the principal edge to this part of the Bristol Urban Area. Moving eastwards from the trading estate, other uses occupy land north and south of the A4. Uses to the north include the St Brendan's Sixth Form College, Long Fox Manor (a listed building that has been converted into a gated community of

residential flats), a smaller local trading estate and the recreational facilities of Brislington Football Club and Brislington Cricket Club.

- 3.6 To the south of the A4, the Brislington Park and Ride and Brislington Enterprise characterise the edge of the urban area. The Wyevale Garden Centre and Bristol City owned allotments are also located south of the A4.
- 3.7 The land to the north of the A4 is relatively self-contained insofar as it is bounded to the north by the Bristol to Bath main line railway and to the east by the A4174 Avon Ring Road. These are clear defensible boundaries to contain development. There are also boundaries to contain development to the south of the A4 in the shape of the topography that rises steeply to the south towards the ridgeline on Stockwood Lane.

# Accessibility Analysis

3.8 The Bristol to Bath transport corridor carries frequent bus services from central Bristol towards Bath and Keynsham along Greater Bristol Bus Network Corridor 3. The bus services operating along the A4 Bath Road and stopping adjacent to the site are as follows:

Service	Route	Mor	n-Fri	Satu	rday	Sun	day
Service	Noule	Day	Eve	Day	Eve	Day	Eve
904	Brislington Park & Ride – Bristol	12 mins	20 mins	12 mins	20 mins	-	-
178/678	Bath – Bristol	60 mins	-	60 mins	-	-	-
349	Keynsham - Bristol	20 mins	60 mins	20 mins	60 mins	-	-
X39/339	Bath –	12-17	60	12-17	60	30	60
V29/229	Bristol	mins	mins	mins	mins	mins	mins

- 3.9 Further services to Cribbs Causeway and Knowle operate on Broomhill Road to the west.
- 3.10 The Brislington park-and-ride facility has about 1,300 spaces and is served by buses into central Bristol from Monday to Saturday, with a 12 minute frequency during the day and 20 minute frequency during evenings. Bristol City Council is understood to be considering an extension of the park-and-ride car park, an option that can be facilitated by the masterplan proposals.

- 3.11 The Bristol Ring Road to the north passes around the eastern fringe of Bristol via Warmley, Emerson's Green and Frenchay to the M32 motorway and then Filton. The Ring Road passes along the site frontage via the A4 to a junction with Callington Road, and then continues via Callington Road to South Bristol.
- 3.12 The A4 has bus priority measures between the park-and-ride site and within Bristol. Additional priority measures were introduced recently to assist bus movements along the corridor, including the introduction of traffic signals at the A4/Ring Road junction. Bristol City Council consulted recently on further priority measures, including capacity improvements at the A4/Stockwood Lane junction immediately west of the park-and-ride site to assist bus movements through the junction.
- 3.13 The A4 is a dual carriageway road over the eastern part of the site frontage, and a two-way road to the west with two lanes westbound. One westbound lane is designated as a fast access route into the park-and-ride site. Surveys by Peter Evans Partnership indicate that the A4 in the vicinity carries peak hour two-way flows in the order of 2,900 vehicles. Main junctions on the road into inner Bristol are signal controlled.
- 3.14 The garden centre is located about midway along the southern site frontage with access direct from the A4. Properties on the south side to the east are serviced via an access road from Durley Hill. On the north side, Ironmould Lane serves employment and recreational uses and an access serves Oakleigh, a private property.
- 3.15 A strategic cycle route passes along the south side of the A4 past the site. This links to a network of designated quiet roads within Bristol. The cycle route also connects via Durley Hill to the centre of Keynsham and via a signal crossing on the A4 with a cycle route along the Ring Road to the north.
- 3.16 The A4 and nearby local roads have footways, mostly on both sides. These connect to the Brislington Enterprise College and to St Brendan's Sixth Form College, and beyond.
- 3.17 The review has confirmed that the site has a high existing standard of accessibility by sustainable means of transport. Bristol City Council's strategy

for the A4 corridor on the approach to the central area is to further enhance bus priority measures. This means that development at Hicks Gate can begin with an existing high standard of accessibility already in place.

#### **Planned Improvements**

- 3.18 The level of existing bus services along the A4 would provide a satisfactory level of public transport accessibility for new development. The recent and likely future enhancements as a result of Greater Bristol Bus Network Corridor 3 works will further improve this level of accessibility. A high standard of bus accessibility would be available from the outset and during initial phases of development. Use of buses and other non-car means of transport can be encouraged through the Travel Plans.
- 3.19 Subject to future detailed discussions with the planning and highway authorities, a development of the scale proposed at Hicks Gate would normally investigate whether the development should contribute to additional services. Such an approach is envisaged in the present case. The potential for some services to be routed through the southern land can be investigated in detail as part of these studies.
- 3.20 Current transport planning practice seeks to avoid the provision of major new road infrastructure to accommodate traffic growth other than for strategic planning reasons. Instead, accommodating growth in movement demand is achieved by concentrating on sustainable transport means.
- 3.21 In any event, constraints on the potential for increasing road capacity within Bristol are such that the major urban extensions identified through the Regional Special Strategy process must adopt such an approach. A benefit of the land at Hicks Gate is that the pattern of urban growth can be managed to take account of an existing high standard of public transport accessibility.

# **Traffic Impact**

3.22 The Peter Evans Partnership has liaised with Bristol City Council and Bath and North East Somerset Council on transport issues.

- 3.23 The strategic nature of the proposals means that the technical testing of effect and mitigation needs to take account of the results of strategic modelling, and in particular through the use of the G-BATS3 model. To date, the model team has been fully occupied with work on behalf of the West of England Partnership and the constituent authorities.
- 3.24 The Peter Evans Partnership has requested access to the model as soon as this work is complete. The modelling exercise will consider the traffic effect of the development at Hicks Gate in a strategic context. This will be an extension of work already being undertaken for the West of England Partnership.
- 3.25 For this reason, this statement does not address detailed traffic impact which requires the results of the modelling. Similarly, the effects of complementary transport and mitigation measures are considered in general terms only as the detailed provision will also require consideration in the light of the modelling work.
- 3.26 The Peter Evans Partnership has undertaken an initial study of potential trip rates and distribution based on census analysis. For initial modelling purposes, morning and evening peak hour vehicle trip rates have been proposed to the model team based on TRICS data approximating to 0.6 two-way movements per dwelling and 0.4 two-way movements per 100 sq m gross floor space for employment use. As more detailed studies progress, multimodal trip rates will be considered, as will the effect of complimentary transport and mitigation measures.
- 3.27 The nearby existing residential and employment uses provide an initial guide on the potential distribution of development traffic. This suggests that about three quarters of total daily people movements would be to or from the west, with the balance to the east or north.
- 3.28 Major urban areas such as Bristol already experience a high level of vehicle movements. Transport policy at a sub-regional level seeks to address this issue. Urban extensions such as at Hicks Gate have an incremental effect and these sites are built out over a number of years. In practice, at peak traffic times the additional traffic is accommodated in the general evolution of traffic movements. This can be by a mix of some impact, changes in travel behaviour such as

changing trip times, adjustments in routes, increased use of non-car means of transport, measures such as park-and-ride and choice of home location.

- 3.29 The Hicks Gate location at the juxtaposition of an existing main public transport corridor and the strategic road network, together with proximity to a park-and-ride site with potential for expansion, allows the proper integration of land use and transport planning. The provision of local facilities would foster an element of self containment and so help reduce traffic movements on the wider road network.
- 3.30 Following the G-BATS3 modelling exercise, the extent of the impact can be addressed to identify any need for complimentary transport measures, such as further enhancements to public transport, or other mitigation measures.

# **Further Technical Constraints Analysis**

- 3.31 A comprehensive suite of technical studies are appended to this Statement:
  - Appendix 5: Landscape (Cooper Partnership).
  - Appendix 6: Archaeology (Waterman Group)
  - Appendix 7: Geophysical Survey (WYAS)
  - Appendix 8: Agricultural land (Waterman Group)
  - Appendix 9: Phase 1 Ecology (Waterman Group)
  - Appendix 10: Detailed Ecology Surveys and Assessment (Waterman Group)
  - Appendix 11: Arboricultural Report
  - Appendix 12: Existing Ground Conditions and Constraints (Arup)
  - Appendix 13: Services (Arup)
  - Appendix 14: Flood risk and surface water drainage (Arup)
  - Appendix 15: Noise (Arup)
  - Appendix 16: Sustainability (Arup)

- 3.32 Brief summaries of the above are contained in the masterplan document at **Appendix 3**. The summary section of the document provides a graphical illustration of the various constraints identified category by category whilst the plans in **Appendix 4** collate the constraints onto two plans.
- 3.33 It should be noted that in many instances within the technical reports, a study area wider than that shown in the masterplan document is shown. This is to ensure that a comprehensive assessment of the area is taken to inform the development proposals. For the avoidance of doubt, the "red line" area promoted by the Development Team is shown overleaf.
- 3.34 The technical reports appended to this statement demonstrate that there are no overriding constraints to development in the locations that have been identified as suitable. Indeed, development is likely to have a positive role to play in securing the long term maintenance of the areas of conservation interest and open the site up to public use.

- 4.1 The latest iteration of a concept Masterplan is provided in **Appendix 3**. It is accompanied by a schedule of land areas and approximates the number of homes that could be built at an average density of over 50 dwellings per hectare. It is important to stress that the proposals have not been subject to any public consultation and do not by any means represent a 'fait accompli'. The development team recognise that as the policy context for the site changes and application proposals emerge the concept plan will need to be subject to robust public consultation.
- 4.2 The masterplan therefore represents a possible 'solution' to development at Hicks Gate that is informed by robust constraints analysis. The purpose of it at this stage is to demonstrate to both LPAs that a sustainable and sensitive solution to delivering a high quality site can be achieved.
- 4.3 The Masterplan work demonstrates that Hicks Gate is a site capable of creating a new sustainable community with a mixture of uses that maintains the separation of the site and Keynsham, that responds to the visual sensitivity of the site and its surrounding area, and that responds to both the local landscape character and ecological value and opportunities of this site.
- 4.4 As referred to in Section 2 of this statement, the BANES Urban Extension Environmental Capacity Appraisal (October 2006) identifies a number of key opportunities for development at Hicks Gate:
  - Opportunity for a high quality mixed used development, possibly with a significant proportion of employment, providing a high quality approach into Bristol;
  - Opportunity to link into existing facilities on the fringes of Bristol eg retail, education, park and ride, employment. This requires close cooperative working with Bristol City Council;
  - Potentially could provide a catalyst for the regeneration of the trading estate areas;

- Would potentially provide new junction on the A4 as well as convenient access for the safe pedestrian connections across the road;
- A significant area within Bristol City could be incorporated into any development to achieve a complete urban extension. Joint Working will be required to sustain this opportunity;
- Possible ring road in this location will form a strong edge to the Bristol conurbation, separating it from Keynsham and supplying a main artery into the development site.
- 4.5 It is readily acknowledged that these are important criteria that the masterplan needs to address. They do however confirm the positive benefits of development at Hicks Gate can provide in the context of the local area.
- 4.6 It is important to demonstrate to both LPAs that a mixed use development can be achieved that provides opportunities for a degree of self-containment but which equally can offer benefits to the existing local communities of Brislington and Keynsham. The evidence base provided by both LPAs suggests that the potential for economic growth in this location is strong and can make a meaningful contribution to Bristol's needs, particularly for local industry and business. A clear need for 'local' industrial and warehousing growth has been identified and it is equally clear that there are few opportunities within the urban area for this to be accommodated. The local need is defined in the sub-regional context and does not therefore relate to national centres of distribution that are more appropriately located closer to the motorway network, for example at Avonmouth. The location of Hicks Gate at Bristol on the main strategic transport corridor to Bath makes it a prime location, as evidenced by the continued high occupancy of the Brislington Trading Estate. Indeed, further provision of similar employment use has the potential of acting as a stimulus to the quality of the environment in the Brislington Trading Estate; it is important that strong links are provided between the two estates.
- 4.7 Employment use at Hicks Gate would be well located from a transport perspective. Lorry movements would have convenient direct access to the strategic road network. Employees would have the benefit of proximity to services on existing bus corridor. The housing element of the scheme would

provide the opportunity for some people who so wish to live near their place of work.

- 4.8 Leisure uses are proposed to enhance the mix of uses available and ensure that the development offers opportunities and benefits not just for new residents but to act as a destination in its own right. The development team has identified the potential for a new ice stadium to serve the sub-region and are willing to facilitate such a use as part of the development proposals. It is acknowledged that such uses will require discussion with local Councils and communities as part of any public consultation exercise to ensure the most appropriate form of development is achieved.
- 4.9 The Masterplan document at **Appendix 3** demonstrates that the proposal:
  - Seeks residential development that would be undertaken at a variety of densities from 30 to 60 per net developable hectare in different areas of the site – this will facilitate a range of housing types (flats, terraced, semidetached and detached housing) and an appropriate proportion of affordable dwellings;
  - Provides for a mix of uses, including residential and employment uses, recreational open space, and areas for a range of complementary Class A1, A2, A3, D1 and local B1 uses;
  - Development to be provided to meet the highest standards of sustainable construction and renewable energy provision appropriate at the time (see Appendix 16)
  - Facilitates an extension of the Park and Ride facility if necessary;
  - Provides a new primary school;
  - Promotes new leisure facilitates and in particular a sub-regionally important ice rink;
  - Provides access from the development to high frequency bus services within and adjacent to the site to encourage modal shift from the private car and dependence on car ownership as well as usage;

- Facilitates extensive public access to Hicks Gate in the form of leisure facilities, formal and informal open space within the existing structure of hedgerows and a network of informal paths;
- Provides for enhancements to the nature conservation value of the site and the surrounding area.

#### **Open Space**

- 4.10 The open space strategy provides an emphasis on both nature conservation management as well as opportunities for recreation. The approach has been landscape and environment led, seeking to achieve a form of development that meets sustainable development objectives in respect of travel and conserving and enhancing the environmental value of the area.
- 4.11 The open space hierarchy would provide for play areas local to new housing areas in accordance with NPFA advice, local amenity open space, and formal playing fields. This will provide public access to a large part of Hicks Gate where it currently does not exist. The green infrastructure strategy will secure in perpetuity the openness of the Stockwood ridgeline.
- 4.12 A 1,500 home development with an approximate population of 3,500 people at 2.3 persons per household would require in the order of 6.5ha of recreational play space to meet NPFA standards. Of this, some 0.9 ha should be for children's play space and 5.6ha for youth/adult provision. The Masterplan identifies an area of 6ha for formal playing fields to serve the neighbourhoods north and south of the A4. Whether contributions to enhance existing facilities in the local area (for which there are many) would be preferable remains to be seen and will be considered through the public consultation process. Children's play provision will be designed at the planning brief and application stages and will be located mainly within the net developable residential areas.

# Access and circulation

4.13 Two new junctions are envisaged on the A4. The western junction would serve mainly the employment area, with the potential also to serve a park-and-ride extension, and also provide a second point of access for the southern residential area. The eastern junction would serve the northern residential area and local

services. Both junctions would be signal controlled, with separate lanes for turning traffic.

- 4.14 The eastern and western junction is would be connected via an internal road. A minor junction could be provided onto Stockwood Road to the south, although use of Stockwood Road towards Stockwood should be discouraged. Ironmould Lane would continue to provide access to the retained employment and recreational uses to the north via a left in/left out junction on the A4 as at present. The access road from Durley Hill serving existing properties south of the A4 would be retained.
- 4.15 The provision of local facilities including a primary school within the site would foster self containment for day to day trips. The proximity to higher education and nearby existing employment, together with the inclusion of employment within the development, would facilitate trips on foot and by cycle.

# **Public Transport**

- 4.16 Most of both the northern and southern sites are within 400 m of the A4 and so would be served by existing bus services. The potential exists to augment these services via a contribution from the developers, for example in respect of weekend or evening services. This is a matter for detailed discussions with the planning and highway authorities in due course.
- 4.17 The internal road connecting the eastern and western access junctions provides the opportunity for some services to be diverted through the southern part of the site, potentially the existing Keynsham services.

# Pedestrians and Cyclists

- 4.18 Detailed planning for pedestrians and cyclists is a matter for a later stage. The accompanying master plan allows for a high standard of internal movement networks giving priority to pedestrians and cyclists.
- 4.19 Internal roads within the residential areas would be designed to a maximum 20 mph design speed, with provision for bus movements on the southern internal circulation road. A high standard of movement for lorries can be achieved via the main access and internal circulation arrangements for the employment area without affecting the residential areas.

- 4.20 The local facilities envisaged on both northern and southern sites would mean that these facilities are convenient to residents. A single primary school is envisaged to serve both northern and southern sites. For this reason a high standard pedestrian crossing facility would be incorporated in the eastern side access. This crossing, and existing and development pedestrian and cycle routes, would serve older pupils heading for the Brislington Enterprise College and St Brendan's Sixth Form College.
- 4.21 The northern length of Ironmould Lane would provide a convenient route to the nearby Broomhill area.

#### **Travel Plans**

- 4.22 Travel Plans would be prepared for both residential and employment uses. Travel plans are seen as an effective measure for encouraging use of sustainable means of transport. For the employment use in particular, travel plans for individual occupiers could be co-ordinated within an overarching Travel Plan which in turn could be co-ordinated with Travel Plans for employers in the nearby Brislington area if appropriate.
- 4.23 The location of Hicks Gate on an existing main public transport corridor provides the opportunity to provide effective choices of means of transport from the outset of development through the Travel Plans

# **Delivery, Implementation and Phasing**

- 4.24 The development can come forward in carefully planned stages to respond to housing and economic need during the plan period. It is important that the phasing strategy is designed to provide an integrated/comprehensive development throughout the various stages of development. The fact that up to four points of access could be created off the A4 allows a flexible approach to be advanced.
- 4.25 How the site is phased depends entirely on agreeing a strategy with the Councils. Much would depend on the eventual distribution of uses; for example, if the employment land were to come forward first then it may be logical to continue with development predominantly to the south of the A4. If housing was more urgent then it is potentially more logical to start north of the A4. These are

matters of careful detail and may for example affect where the primary school is ultimately located.

- 4.26 The masterplan document is intended to provide the starting point for the formulation of a development brief that would guide the detailed design and subsequent implementation of the development. The development brief would identify the need for appropriate planning obligations and conditions including the phasing of the development.
- 4.27 The proposals will provide a response to identified development needs on a site that is both suitable in principle, and more suitable than alternatives in respect of appropriate assessment criteria that are based on achieving sustainable patterns of development and conserving the environmental assets of the area for future generations. The proposals are entirely deliverable and are not dependent on third party land.
- 4.28 A potential build programme is set out below. It assumes that both the Bristol and BANES Core Strategies will be adopted before the end of 2011 and that an outline planning application can be approved upon adoption of the BANES Core Strategy (which will most probably follow after the Bristol Core Strategy).

Hicks Gate Build Programme Key Delivery Targets						2102							5014 2013	5015	5016	2017	2018	5019	5050	12021	5022
	nsl	ЧэЯ	Mar	٦qA	Мау	əunr	Λınr	bn∀	Sept	Oct	voN	Dec	31 Mar 31 Mar	31 Mar							
1. Outline planning approval																					
2. Reserved matters approvals																					
3. Conditions discharged																					
4. S38/278 technical approvals																					
5. Infrastructure site start																					
6. Remaining conditions discharge																					
7. 1 <sup>st</sup> Residential completions																					
8. Units Complete													90	120	300	909	002	006	1,150	1'320	ا'200
9. No. of developers onsite													-	3	3	4	4	4	5	4	3

Hicks Gate Statement of Deliverability RPS

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- 5.1 This section of the Statement seeks to consider the criteria contained within both Council's Sustainability Appraisal and how the proposals described in this submission perform.
- 5.2 The appraisal has used the following methodology to assess the impacts of the development proposals.

Impact	SA Effect
++	Significant Positive
+	Positive
0/+	Marginal Positive
0	Negligible change
0/-	Marginal Negative
-	Negative
	Significant Negative

5.3 Helpfully, the SA criteria for both Councils are very similar and can be considered alongside one another. The SA Objectives are referred to in turn below.

# **OBJECTIVE 1: ACCESSIBILITY TO FACILITIES**

**BANES:** Improve accessibility to community facilities and local services. Help everyone access basic services easily, safely and affordably (RSS 4.3). Increase access to and participation in community and cultural facilities and activities (RSS 2.5). BCC: To help everyone access basic services easily, safely and affordably.

#### **Overall Impact: 0/+ (Marginal Positive)**

- 5.4 Development at Hicks Gate would benefit from proximity to a wide range of services and facilities. RPS has undertaken a facilities survey of the local area (Appendix 17).
- 5.5 Residents will benefit from the new hospital at Hengrove Park and would be located adjacent to the new academy school in Brislington. It is within easy walking distance and thus access is not reliant on any improvements to public transport.
- 5.6 Access to Keynsham from Hicks Gate is within easy cycling distance and is located on the same strategic A4 public transport corridor for which a 15 minute bus service operates between the two locations (and Bristol and Bath beyond).

Strategic development at Hicks Gate can only enhance this level of service provision.

- 5.7 The SA recognises that the vision for the SE Bristol Urban Extension will provide a range of services and facilities to support the needs of new and existing communities. Any development of 'strategic scale' will enable the provision of new services that provides betterment for the existing community.
- 5.8 The Hicks Gate urban extension easily exceeds the threshold of development required to deliver a wide range of services and facilities that can serve the new community and existing communities in Brislington and Keynsham.
- 5.9 Though it is fair to say that the local centre facilities are more likely to be used by new households (as it is unlikely to prove sufficient draw from other similar convenience goods locations in Brislington) the leisure uses such as the potential ice rink and public house are more likely to act as destination uses that draw people in from further afield.
- 5.10 The quality of public transport serving the development provides future Hicks Gate residents with opportunities to access unrivalled sustainable means of travel into Bristol City Centre, Keynsham and Bath.

# **OBJECTIVE 2: HEALTH**

**BANES:** Improve the health and wellbeing of all communities. Improve Health (RSS 1.1). Reduce Health inequalities (RSS 1.2). Promote healthy lifestyles, especially routine daily exercise (RSS 1.3). BCC: To promote healthy lifestyles; to improve the broad determinants of health; to reduce inequalities in health.

# **Overall Impact: 0/+ (Marginal Positive)**

- 5.11 The relationship between the urban extension and Bristol urban area is considerably stronger than its relationship with the wider BANES authority area. As such, for the purpose of assessing the health and wellbeing of communities, RPS considers it appropriate to look at neighbouring output areas within the existing Bristol urban area to assess the potential to improve the health and wellbeing of all communities.
- 5.12 Information on health and wellbeing within the Super Output Areas adjacent to the proposed urban extension sites south of Bristol has been obtained from the

'Deprivation in Bristol' publication by Bristol City Council (2007). The data provides a score and a rank to illustrate how this score compares to all Super Output Areas nationwide, where 1 is the most deprived Super Output Area in the country.

- 5.13 Two Super Output Areas of Broomhill Road and Hicks Gate are adjacent to the Hicks Gate site, which are ranked 9,684 and 7,582 respectively. The SA objective to improve the health and wellbeing of all communities also recognises the importance of reducing health inequalities and promoting healthy lifestyles and routine daily exercise. The above data highlights that health deprivation and disability within the areas surrounding Hicks Gate is an issue and the introduction of a new community at Hicks Gate, together with services, facilities and recreational opportunities would provide greater opportunity to improve health within the area.
- 5.14 There are existing recreation facilities adjoining the Hicks Gate site which the development team have committed to retaining and enhancing, therefore creating positive opportunities for the promotion of healthy lifestyles and routine exercise as part of an integrated development. The provision of green infrastructure is an essential component of the vision for the area. Development will make the area publicly accessible for the first time.
- 5.15 Given the scale of development proposed it is likely that Hicks Gate will need to provide its own range of health facilities onsite.
- 5.16 As set out above, the Hicks Gate location straddles the A4 corridor. The City Council itself undertook public consultation in Summer 2009 on the A4 greater Bristol bus network. The consultation states that:

#### "These proposals include measures to improve bus reliability in both directions together with road safety improvements and enhancements for pedestrians, cyclists and car drivers".

- 5.17 In particular it seeks to provide new cycle lanes, advance stop lines, wider pavements along sections of the route, improved pedestrian crossings, additional pedestrian crossings and kerb build outs to improve safety at junctions.
- 5.18 The A4 is obviously considered as one of the key showcase corridors in Bristol. Development at Hicks Gate and the new community that would exist would be

able to exploit these new walking and cycling opportunities. It is reasonable to assume therefore that there will be opportunities to encourage healthy lifestyles through travel plans and access to areas of recreation.

5.19 In respect of the existing Brislington community, it is acknowledged that the urban extension is unlikely to have significant impacts "negative or positive" in terms or promoting healthier lifestyles. If however better links through to the existing communities can be provided, and an attractive and high quality living, working and recreational environment be achieved then it is not unreasonable to assume that existing residents will choose to access the wider countryside through the Hicks Gate development and the walking and cycling routes that will be provided. The benefits in that sense can only be positive.

#### **OBJECTIVE 3: MEETING HOUSING NEED**

**BANES:** Meet identified needs for sufficient, high quality and affordable housing. Help make suitable housing available and affordable for everyone (RSS 2.1). BCC: To make suitable housing available and affordable for everyone.

#### **Overall Impact: ++ (Significant Positive)**

- 5.20 All sites that have capacity to provide housing also have the ability to provide affordable housing and making a positive contribution to meet identified needs for sufficient and high quality affordable housing.
- 5.21 The West of England Strategic Housing Market Assessment (June 2009) identifies that affordability of housing within the West of England is a critical issue to address. This is one of the principal reasons why the strategic housing requirement for the West of England has increased during the preparation of the RSS. Within BANES, the annual average need for affordable housing out strips the annual average supply of new build housing (116%) which highlights the need for a step change in the delivery of housing. The 116% figure is the highest of all six LPAs within the West of England.<sup>1</sup> Bristol City is second only to BANES at 102%.
- 5.22 The West of England Strategic Housing Market Assessment also provides details on the affordability of individual zones which enables those areas where

affordability is most acute to be identified. Both Bristol South and Keynsham fall towards the least affordable zones within the West of England scale.

- 5.23 The BCC SA acknowledges the positive impacts that the urban extension could have on this criterion. It is important to recognise that there are few strategic locations in Bristol that can provide a wide variety of house and flat types (whether they be affordable or open market) that can be attractive to a wide and diverse cross section of the community.
- 5.24 Both Authorities will be looking to ensure provision is made for a wide mix and tenure type of affordable housing; indeed, in its Spatial Options Paper, BANES advocate a range of 10 different dwelling types to ensure the need is met. Meeting that wide range of dwelling types will only be possible on the larger sites, and Hicks Gate has a pivotal role to play in that sense.
- 5.25 The SHMA recognises that

"There is a widespread concern that recent patterns of housing provision, in both the private and social sectors, have not paid sufficient attention to the needs of families with children. The high proportion of recent development which has consisted of smaller flatted properties at high density has attracted some criticism. CLG's recent decision to fund a number of pathfinder schemes to tackle overcrowding has brought this issue higher up the agenda for many social landlords."<sup>2</sup>

5.26 In a wider sense, the development of a strategic urban extension can provide for a much wider range of housing that suits a wider cross section of the community than smaller sites within the urban area. The strategy for high density development in the Bristol urban area is unlikely to translate into the provision of a significant range of family accommodation. Indeed, the SHMA identifies that,

> "More generally, across WoE as a whole the emphasis should be more on accommodation suitable for families from 2-bedrooms up to four bedrooms, and larger, in size. While overall it is suggested that nearly three-fifths of social rented provision should be in this latter category, there are some zones where it appears that most or all provision should be in that category: <u>Keynsham</u>, Bath City South,

<sup>&</sup>lt;sup>1</sup> Table 4.12 WoE SHMA (June 2009)

<sup>&</sup>lt;sup>2</sup> Paragraph 10.1.1: SHMÀ

# Chew Valley, <u>Bristol South</u> and North, Kingswood, Thornbury all have indicative figures at or above 75%.<sup>3</sup>

5.27 The SHMA actually identifies that 100% of social rented need is for family housing (ie not flats). There are few strategic opportunities within the urban area that this need can be addressed satisfactorily.

#### **OBJECTIVE 4: VIBRANT COMMUNITIES**

**BANES:** Promote stronger more vibrant and cohesive communities. Promote stronger more cohesive communities (RSS 2.4). BCC: To promote stronger more vibrant communities.

#### Overall Impact: + (Positive)

- 5.28 It is acknowledged that there are a number of disparate uses that characterise this part of South East Bristol. They include St Brendan's College, the Park-and-Ride, Wyevale Garden Centre, Long Fox Manor, the various sports pitches and the Brislington Trading Estate. Although development at Hicks Gate cannot resolve these land use 'zones', development can provide a better edge to this part of Bristol and seek to provide links through these land uses back to the existing Brislington community. At present, some of those uses are somewhat peripheral and an 'anchor' development at Hicks Gate can provide a better context for the role that those uses play in the community.
- 5.29 The BCC SA acknowledges that:

"The urban extensions would provide new leisure, recreation, education and employment facilities and there are opportunities to provide links in existing urban areas to enable Bristol residents to access new facilities and new residents to access Bristol facilities thereby providing a positive impact."

5.30 If developed comprehensively the Hicks Gate Urban Extension exceeds the threshold of development required to deliver a wide range of services and facilities that can serve the new community and existing communities in Brislington and Keynsham. The Illustrative Masterplan seeks to demonstrate how those provisions can be made and how the links can be created.

<sup>&</sup>lt;sup>3</sup> Paragraph 9.1.11: SHMA

5.31 The opportunities to provide destination facilities at the urban extension is far greater than the vast majority of other developments in Bristol (on the basis that development is strategic in scale). The Masterplan makes provision for a leisure use of significant scale (potential ice rink) that would provide a resource of sub-regional importance.

#### **OBJECTIVE 5: REDUCE CRIME**

**Reduce anti-social behaviour, crime and the fear of crime.** *Reduce crime and fear of crime (RSS 2.3).* **BCC: To reduce crime and fear of crime.** 

# **Overall Impact: 0/+ (Marginal Positive)**

- 5.32 It is acknowledged that there are a number of disparate uses that characterise this part of South East Bristol. As referred to above although development at Hicks Gate cannot resolve these land use zones development can provide a better edge to this part of Bristol and seek to provide links through these land uses back to the existing Brislington community. At present, some of those uses are somewhat peripheral and an 'anchor' development at Hicks Gate can provide a better context for the role that these uses play in the community. In turn, this could have a positive role to play in reducing crime levels in the local area as passive surveillance will naturally increase. To that end, development can have a positive impact on a culture of a community, acting to reduce anti-social behaviour, crime and fear of crime.
- 5.33 Information on crime levels within the Super Output Areas adjacent to the proposed urban extension sites south of Bristol has been obtained from the Deprivation in Bristol 2007 publication by Bristol City Council. The data provides a score and a rank to illustrate how this score compares to all Super Output Areas nation-wide, where 1 is the most deprived Super Output Area in the country.
- 5.34 Two Super Output Areas of Broomhill Road and Hicks Gate are adjacent to the Hicks Gate site, which are ranked 7,557 and 7,620 respectively. The SA objective is to reduce anti-social behaviour, crime and the fear of crime. As such, the Wards adjoining the Hicks Gate site represent a relatively high risk of crime in the Bristol context. Whilst development per sae cannot resolve crime in an area, new development will ensure that the affected community 'grows' through an injection of new households and a greater diversity of people. It is more relevant

at Hicks Gate given the anchor role it has in linking those peripheral and potentially unsafe uses into the community.

5.35 All developments should be designed with "Secure by Design" principles in mind to minimise the impact of crime that any development would have on the wider community.

#### **OBJECTIVE 6: ACCESS TO TRAINING**

**BANES: Improve the availability and provision of training.** *Give everyone access to learning, training, skills and knowledge (RSS 2.2).* **BCC: To give everyone access to learning, training skills and knowledge.** 

#### **Overall Impact: 0 (Negligible Change)**

- 5.36 It is acknowledged that education facilities need to be provided at the urban extension, and the Illustrative Masterplan seeks to demonstrate how this can be achieved through the provision of a primary school onsite.
- 5.37 The 2006 BANES Sustainability Appraisal acknowledges that:

"Concentrating higher levels of development at Bristol will enable a greater number of residents easier access to learning, training, skills and knowledge with access to a range of public and independent schools, special schools, Bristol University and University of the West of England. There would also be a wide range of employment opportunities".

5.38 Hicks Gate lies adjacent to the new Brislington Academy and St Brendan's College. The SA refers to the need for strong links through to the City Centre and there are few better links than the Showcase bus corridor along the A4 that is going to be subject to significant upgrade and enhancement. Moreover, the Hicks Gate area is located adjacent to the A4174 Avon Ring Road and is therefore readily placed to access other higher education establishments such as the University of the West of England in the Bristol North Fringe. Moreover, the Hicks Gate area is readily placed to access education and training establishments outside Bristol in nearby Keynsham and Bath for which equally good public transport services exist.

#### **OBJECTIVE 7: ACCESS TO EMPLOYMENT**

BANES: Ensure communities have access to a wide range of employment opportunities, paid or unpaid; enable local businesses to prosper. Give everyone in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1). Reduce poverty and income inequality (RSS 3.3) Provide a diverse range of employment opportunities in a variety of sectors. Increase the circulation of wealth within the local authority area (RSS 3.5). Reduce vulnerability of the economy to climate change and harness opportunities arising (RSS 3.7). BCC: To give everyone in the City satisfying opportunities for work; to help everyone afford comfortable standard of living by reducing property and income inequality; to increase the circulation of wealth within the City

#### **Overall Impact: ++ (Significant Positive)**

- 5.39 Crest Strategic Projects and Key Properties Limited are committed to the provision of a sustainable mixed use community at Hicks Gate that provides an appropriate mix of employment and housing growth. Figure 3.1 of the Employment Land Study demonstrates that both the Brislington East and West Wards provide a relative degree of "self containment" insofar as there are nearly as many jobs available as there are economically active people living in those wards. Of course, it is naïve to assume that all those living in Brislington East and West would all be working within the same ward; however, it does demonstrate that there are a significant number of jobs available for local residents to exploit. Indeed, out of the 35 wards in Bristol, both the Brislington East and West Wards have the eighth highest ratio of jobs to residents. It does not therefore suggest that these wards are merely outlying suburbs of Bristol City but have a strong economic pedigree in their own right. Again, the Brislington East and West Wards have the eighth and ninth highest number of jobs available within the entire City. The balance of jobs and homes in these wards is far better than the majority of other Wards within the City.
- 5.40 Hicks Gate is well placed to make provision for economic development onsite. This is confirmed by the BANES previous SA work (August 2006) that established that the *"Hicks Gate area may be a better location for employment provision. It could also provide local job opportunities for Keynsham acknowledging the high levels of commuting that currently exist from Keynsham to Bristol."*
- 5.41 Hicks Gate benefits from close proximity to a significant established employment area (the Brislington Trading Estate), as well as being in close proximity to

frequent bus services into Bristol and Bath, and the public transport hub of the Park-and-Ride. The proximity to the A4174 Ring Road also makes the site highly accessible and more attractive to accommodate commercial space.

5.42 The ELS makes clear that there is a very strong need for additional industrial and warehousing land in the city outside of Avonmouth (24.5ha). That need does not change regardless of the wider economic growth projections for the area (ie 2.8% or 3.2% growth). Both the ELS and Bristol Core Strategy confirm that there are few opportunities to provide for this need within existing City limits. The ELS identifies one possible location at Novers Hill but this can only accommodate between 5-10 hectares of the need. The ELS identifies one other area at Hicks Gate as a location where this need can be accommodated. Given the relationship to the Brislington Trading Estate, it *"ticks many of the boxes"* in terms of it being a sound location to make further provision. Paragraph 5.81 of the ELS identifies,

#### "an area to the east of Brislington Park and Ride, south of the A4. This approximately 20 hectare site is currently open land which benefits from close proximity to the Brislington Trading Estate and the A4 and Avon Ring Road."

5.43 In terms of the attractiveness of the location, the ELS confirms at paragraph 5.11 that,

"Analysis of industrial and warehouse take up statistics for 2002-2005 shows B8 space featuring in the greatest number of transactions. Examples of take up of this type of space feature in most of the industrial areas in Bristol, with concentrations in Avonmouth, South Liberty Lane, <u>Brislington</u> and industrial areas in Lawrence Hill ward."

- 5.44 The context for the Brislington Trading Estate is that it represents a location for local business to thrive. The context for the need and demand for additional industrial and warehouse space at Hicks Gate is more related to local "West of England" business than the national distributors that will naturally focus on strategic opportunities closer to the motorway network (Avonmouth, Severnside, Bristol North Fringe etc).
- 5.45 The BCC SA commentary acknowledges that the urban extension could have positive impacts on the residents of existing areas through an increase in employment opportunities.

5.46 Map 3.3 in the Employment Land Study identifies that 84,500 people commute into Bristol from areas outside the Bristol built up area. Nearly 30,000 people commute into central Bristol from outside the Bristol urban area every day. The ELS commentary at paragraphs 3.25 and 3.26 suggests that:

*"It highlights strong inflows to both central Bristol and the North Fringe and the strong pull of the conurbation provides to people living outside the area to travel to the City for work."* 

Evidence suggests in central Bristol that the number of jobs far outweighs the number of people who live and work in the area. The difference between the two is almost tenfold. This suggests that people are currently prepared to travel beyond their immediate locality to get to work".

- 5.47 None of this should be considered a surprise. Bristol is after all the economic driver of the South West. The ELS identifies that the statistics from the 2001 Census demonstrate that in Bristol City, there were 215,417 jobs available against an economically active population of 186,878. In the North Fringe in South Gloucestershire, the jobs/homes imbalance is even greater where there are approximately 70,000 jobs, for which only 25% of those workers live in the local area.
- 5.48 The RSS Modifications identify a need to provide for about 92,000 additional jobs in the Bristol travel to work area in the period up to 2026, against an overall household increase of 87,000. Although the balance will be redressed slightly, it is clear that Bristol will continue to be a major pull for commuters outside of the Bristol urban area.
- 5.49 The Hicks Gate area lies closer to the City Centre than many other parts of the Bristol urban area. Many households will be attracted to live in the Hicks Gate development because of its proximity to the City Centre. Provision of new homes at Bristol is essential to ensure it remains a sustainable place in which to live and work. The Hicks Gate area might very well be attractive to those households that currently commute into Bristol and therefore will make provision for households to be far closer to the City Centre than the current prevailing situation. The fact that it lies on a strategic public transport corridor for which major improvements and enhancements are proposed renders it an exceptionally sustainable location for growth.

5.50 Whilst a reasonable balance of jobs and homes can be provided within the urban extension, it is naïve to assume that total self containment can be achieved. Again, it is critical that development is located in the most sustainable locations close to major nodes of public transport accessibility. It is considered that Hicks Gate performs as well as or if not better than any other urban extension opportunity on the edge of Bristol in this respect. Opportunities for cycling to work are therefore significant and it is self evident that the urban extension can play an important role in achieving the City Council's objectives for ensuring mixed use sustainable communities.

#### **OBJECTIVE 8: MEETING NEEDS LOCALLY**

**BANES:** Increase availability of local produce and materials. *Meet local needs locally (RSS 3.4).* BCC: To meet local needs locally.

#### **Overall Impact: 0 (Negligible change)**

- 5.51 The Illustrative Masterplan demonstrates that the development team have considered the need to retain and enhance the existing allotment space at Hicks Gate. The potential exists to expand the existing area west of the Wyevale Garden Centre, or if it is considered that more efficient use can be made of that land, the allotments can be moved elsewhere in the development area. It is equally important that allotment land is provided in the context of a linked network of green infrastructure.
- 5.52 The ELS identifies an acute shortage of industrial and warehousing land that could be met in part at Hicks Gate. That industrial and warehousing land is a specific requirement outside of Avonmouth which is home to larger national and regional distribution businesses. The opportunities at Hicks Gate are likely to be more attractive to **locally** based employment and hence will help provide greater levels of self containment within the wider South Bristol area.

### **OBJECTIVE 9: PUBLIC TRANSPORT ACCESSIBILITY**

**BANES:** Ensure everyone has access to high quality and affordable public transport and promote cycling and walking. *Make public transport, cycling and walking easier and more attractive (RSS 4.4).* BCC: To make public transport, cycling and walking easier and more attractive.

#### Overall Impact: ++ (Significant Positive)

- 5.53 Most urban extension locations adjacent to Bristol offer great potential to be well served by high quality and affordable public transport services, albeit Hicks Gate is served particularly well. The proximity of Hicks Gate to the existing transport hub of the Brislington Park and Ride offers an established regular bus service into Bristol City Centre from the outset of the development. The development has the scope to extend the Park and Ride as part of the urban extension if deemed necessary and appropriate. The fact that the site is better equipped to provide for local jobs, and provide walking and cycling links into existing employment areas speaks volumes of the location.
- 5.54 The Hicks Gate location has the potential to maximise the ability for residents to access high quality public transport facilities. Reference has already been made to the improvements proposed as part of the greater Bristol bus network strategy for the A4 in relation to cycle and pedestrian facilities. It is worth highlighting some of the initiatives proposed as part of the strategy:

### **Travelling environment**

- 24 hour/peak inbound and outbound bus lanes along sections of the route
- Upgraded traffic signals to allow priority for buses
- Parking and loading restrictions to support bus priorities and assist the improvement of traffic flow
- Improved frequency and reliability of buses
- Alternations to traffic signals and approach lanes to improve capacity for general traffic

### Bus stop infrastructure

- Raised kerbs to assist the mobility impaired and facilitate access to buses
- Longer bus platforms to accommodate multi access vehicles
- Longer bus stop bays to improve passenger to vehicles
- New high quality bus shelters with an improved waiting environment including the use of CCT.

### Buses

- New local vehicles to allow access for wheelchairs, parents with buggies and shoppers with trolleys;
- Low floor, low emission buses.
- 5.55 These improvements suggest that the City Council is doing everything it can to greatly enhance public transport accessibility along the A4. Coupled with the fact that the site lies adjacent to the Brislington Park and Ride suggests that the opportunities to reduce the need to travel into the City Centre by car (and to other centres of employment such as the North Fringe and Bath) are greatly increased.

### **OBJECTIVE 10: REDUCING THE NEED TO TRAVEL BY CAR**

**BANES: Reduce the need and desire to travel by car.** *Reduce the need/desire to travel by car (RSS 4.1).* **BCC: To reduce the need/desire to travel by car** 

### Overall Impact: ++ (Significant Positive)

5.56 As set out under Objective 7, 84,500 people travel into Bristol to work every day. Development at Hicks Gate is likely to prove attractive to those commuters as well as existing residents in the Bristol urban area. Given the quality of public transport availability, the enhancements to pedestrian and cycle links that are proposed along the A4 and proposed further employment development at Hicks Gate, the prospects for reducing the need to travel by car from this location are significant. Given the quality of public transport services that will be available, it is arguable that this location provides greater opportunities to reduce the need to travel by car than many other urban locations that are closer to the City Centre.

### **OBJECTIVE 11: LOCAL DISTINCTIVENESS**

**BANES:** Protect and enhance local distinctiveness. Protect and enhance landscape and townscape (RSS 5.3). Value and protect diversity and local distinctiveness including rural ways of life (RSS 5.4). BCC: To promote the conservation and wise use of land; and to protect and enhance landscape.

### **Overall Impact: 0/- (Marginal Negative)**

5.57 Both SAs identify that the Hicks Gate location is comparably isolated and adjoins a range of disparate land uses that makes it difficult to achieve good links back to the existing Brislington community. If so, development at Hicks Gate has the potential to impact positively on local distinctiveness through high quality sensitive design. If a better 'sense of place' can be provided then the impact must be a positive one.

- 5.58 As the Environmental Capacity Appraisal identifies, there is an opportunity for high quality mixed-use development at Hicks Gate to provide a high quality approach into Bristol. It goes on to identify that it could provide a catalyst for the regeneration of the trading estate and there are opportunities to link into existing facilities. Those facilities at present do not combine to make a *"locally distinctive"* place. High quality development can only enhance this and provide a much improved gateway into South Bristol.
- 5.59 It is however recognised that there will be a loss of greenfield land on the edge of the City, which in itself will have a negative effect on the protection of the landscape. Development will however ensure that the new edge defines a new Green Belt boundary that protects the higher quality elements of the landscape. To that end, the negative impact is considered to be only marginal and greater recognition of the positive benefits of development should be at the heart of both Councils consideration of the site.

### **OBJECTIVE 12: PROTECTING CULTURAL ASSETS**

**BANES:** Protect and enhance the district's historic, environmental and cultural assets). *Maintain and enhance cultural and historical assets (RSS 5.5).* BCC: To increase access and participation in cultural activities.

### **Overall Impact: 0 (Negligible Change)**

- 5.60 Crest Strategic Projects and Key Properties have undertaken a thorough archaeological assessment of the area and have found no deposits of any material interest. The Listed Buildings, and registered Park and Gardens form a key part of the green infrastructure and overall context for the Hicks Gate development and will be fully integrated and protected in perpetuity. It is considered that development can only help enhance and protect the existing character of the area.
- 5.61 The urban extension is unlikely to be able to compete with the established cultural facilities, of which there are many in the City Centres of Bristol and Bath. Given the public transport accessibility that exists, the new community at Hicks Gate would be well placed to readily access those facilities.

#### **OBJECTIVE 13: ENCOURAGE BIODIVERSITY**

**BANES:** Encourage and protect habitats and biodiversity. (taking account of climate change). Protect and enhance habitats and species (taking account of climate change) (RSS 5.1). BCC: To protect and enhance habitats and species.

#### **Overall Impact: 0/+ (Marginal Positive)**

5.62 Crest Strategic Projects and Key Properties have undertaken a thorough ecological appraisal for the Hicks Gate area. The evidence demonstrates there are few ecological interests on site that present serious constraints to development. The site does lie adjacent to the Stockwood area of open space. That area of open space is poorly managed and development has a potentially significant role in enhancing the management of that space, increasing learning opportunities for the wider habitat. The Stockwood area of open space is an old landfill site that has subsequently been capped. Leachate seeps into the steam corridor that runs into the Hicks Gate area (see Ecological Appraisal). Development at Hicks Gate has the potential to provide natural treatment (reed beds etc) to reduce the pollution in the water in this location and improve the general habitat and biodiversity.

### **OBJECTIVE 14: REDUCE POLLUTION**

**BANES: Reduce land, water, air, light, noise pollution.** *Minimise land, water, air, light, noise pollution (RSS 6.5).* **BCC: To minimise air, light and noise pollution.** 

### Overall Impact: 0/+ (Marginal Positive)

- 5.63 As referred to above, Hicks Gate lies adjacent to the Stockwood area of open space. This is an old landfill site that has subsequently been capped. There is evidence of Leachate seeping into the stream corridor that runs through the Hicks Gate area (see Ecological Appraisal). Development at Hicks Gate has the potential to provide natural treatment (reed beds etc) to reduce the pollution in the water in this location and improve the general habitat.
- 5.64 In a wider sense, reference has been made to the site's proximity to a comprehensive public transport network. In turn, the site offers the potential for its residents to reduce the need to travel by car and in turn, meet wider climate change and pollution reduction initiatives.

#### **OBJECTIVE 15: SUSTAINABLE CONSTRUCTION**

**BANES:** Encourage sustainable construction. Development that demonstrates sustainable design and construction. Minimise consumption and extraction of minerals (RSS 6.3). Reduce waste not put to any use (RSS 6.4).

#### Overall Impact: + (Positive)

5.65 The development at Hicks Gate provides the scope to provide a new community of significant scale. Development at a strategic scale provides for better economies of scale and enhances the ability for developers to meet the push for higher standards of sustainable construction.

#### **OBJECTIVE 16: SUSTAINABLE ENERGY**

**BANES:** Ensure the development of sustainable and/or local energy sources and energy infrastructure. Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1) Promote sustainable energy generation and distribution. BCC: To reduce non renewable energy consumption and greenhouse gas emissions.

#### Overall Impact: + (Positive)

- 5.66 Large scale developments such as urban extensions offer significant benefits over smaller scale developments in respect of suitable/local energy sources and energy infrastructure, and as such offer greater sustainability benefits in this respect. This is owing to the economies of scale offered by large scale development both in terms of costs associated with the purchase of such technologies, but also the fundamental feasibility of renewable energy technologies to provide energy for new developments. Many renewable or low carbon technologies are simply not feasible for small scale developments, given the cost and land-take implications.
- 5.67 **Appendix 16** of this statement provides an assessment of the potential of the site to contribute to sustainable energy objectives.

#### Objective 17: ADDRESSING CLIMATE CHANGE

**BANES:** Reduce vulnerability to, and manage flood risk (taking account of climate change). Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6). BCC: To reduce the vulnerability of the economy to climate change and harness opportunities arising.

Overall Impact: 0 (Negligible Impact)

- 5.68 There is a significant difference in levels between the Hicks Gate site and the River Avon to the extent that there is no threat of flooding whatsoever. There is a small flood zone associated with the stream corridor that runs through the site but this is of no detriment to the development proposals. The stream has an active role to play in providing green infrastructure through the site. Crest Strategic Projects and Key Properties have prepared a baseline Flood Risk Assessment that is accompanied by a drainage strategy incorporating SUDS system. The opportunities presented by the stream corridor present no real constraint on the development capacity of the land, and should be considered a key opportunity in providing enhanced biodiversity.
- 5.69 In accordance with the above commentary, there represents great potential for more sustainable means of transport that can contribute to reducing the City's overall carbon footprint.

#### **OBJECTIVE 18: NATURAL RESOURCES**

**Encourage careful and efficient use of natural resources.** Promote the conservation and wise use of land (RSS 5.2). Keep water consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2). Minimise consumption and extraction of minerals (RSS 6.3). BCC: To minimise consumption and extraction of minerals; to minimise land pollution.

#### **Overall Impact: 0 (Negligible Impact)**

5.70 No comment.

#### **OBJECTIVE 19: WASTE MANAGEMENT**

**BANES:** Promote waste management in accordance with the waste hierarchy. (*Reduce, Reuse and Recycle*). *Reduce waste not put to any use (RSS 6.4).* BCC: To reduce waste not put to any use.

#### **Overall Impact: 0 (Negligible Impact)**

5.71 No comment.

### **Summary and Conclusions**

5.72 Of all the locations outside of the existing Bristol urban area, it is considered that Hicks Gate is the most sustainable location to accommodate growth. Hicks Gate benefits from the fact that it will form part of the Bristol urban area and walking and cycling opportunities are greater. Moreover, the site is located adjacent to the Brislington Park and Ride facility where there can be no more frequent bus service. In any event, the A4 corridor itself is a major strategic public transport artery for which buses can easily be diverted into the Hicks Gate site so serve both Bristol and Bath.

5.73 In terms of meeting sustainability objectives the site performs equally well whether it is considered against the existing context in locational terms and accessibility to facilities, or whether it is in consideration of what benefits and enhancements development can bring to the local area.

### 6. CONCLUSIONS

- 6.1 This Statement of Deliverability seeks to provide Officers and Members of Bristol City and BANES with an up to date analysis of constraints affecting development at Hicks Gate, and seeks to demonstrate how an appropriate form of development can evolve.
- 6.2 The masterplan proposals advanced by RPS seek to advance best practice advice in design, access, and sustainable development techniques. The mixed use development proposals seek to provide a sustainable community at Hicks Gate that integrates with the existing community and makes a telling contribution towards the economic and housing needs of Bristol.
- 6.3 This represents the first opportunity the Development Team have had to present a rounded case to both Bristol City and BANES that demonstrates how a comprehensive understanding of the constraints and opportunities can result in a robust development area. The strategy takes no account of administrative boundaries as the approach has always been to provide an urban extension appropriate in the Bristol context.
- 6.4 It is recognised that the masterplan presented will need to be thoroughly tested through Core Strategy examination and through wider public consultation. The Hicks Gate team look forward to answering any queries the Officers may have and developing the proposals in partnership with both Councils through the Core Strategy processes.

# BANES Core Strategy Spatial Options Representations

### **Bristol City Publication Core Strategy Representations**

## **RPS Masterplan Document**

### **RPS Constraints Plans**

### **Cooper Partnership Landscape Capacity Assessment**

# Waterman Group Archaeological Assessment

WYAS Geophysical Survey

## Waterman Group Agricultural Land Survey

### Waterman Group Phase 1 Ecology Survey

# Waterman Group Detailed Ecology Surveys and Assessment

# Arboricultural Report (electronic version only)

# Arup Existing Ground Constraints Report

## **Arup Service and Utilities Report**

Arup Flood Risk and Surface Water Drainage Report

Arup Noise Survey

# Arup Sustainability Report

### **RPS Facilities Audit**

#### APPENDICES VOLUME II

- 10. Detailed Ecology Surveys and Assessment (Waterman Group)
- 11. Arboricultural Report (electronic copy)
- 12. Existing Ground Conditions and Constraints (Arup)
- 13. Services (Arup)
- 14. Flood risk and surface water drainage (Arup)
- 15. Noise (Arup)
- 16. Sustainability (Arup)
- 17. RPS Facilities Audit