

AJB/P17-2702

10th January 2018

Planning Policy
Bath & North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

BY E-MAIL ONLY

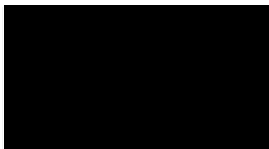
Dear Sir/Madam

BATH & NORTH EAST SOMERSET LOCAL PLAN 2016-2036: ISSUES & OPTIONS
LAND AT CHURCH ROAD, PEASEDOWN ST JOHN

I write on behalf of my clients Edward Ware Homes to respond to the current Bath & North East Somerset Local Plan 2016-2036: Issues & Options Consultation. Edward Ware Homes have multiple '**non-strategic**' land interest at Midsomer Norton (multiple parcels), Paulton, High Littleton and Bishop Sutton. **My client's response is set out fully within the enclosed report.**

At the appropriate time, my clients would wish to take a full part in any subsequent examination in public.

Yours sincerely



Alex Bullock
Principal Planner
e-mail: alex.bullock@pegasusgroup.co.uk

Enc. BANES I & O Repts

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

T 01454 625945 | F 01454 618074 | W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT



BATH AND NORTH EAST SOMERSET LOCAL PLAN 2016-2036: ISSUES AND OPTIONS CONSULTATION EDWARD WARE HOMES

Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

T 01454 625945 | **F** 01454 618074 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	SPATIAL STRATEGY OPTIONS	3
3.	NORTHMEAD ROAD, THICKETMEAD & BOXBURY HILL, MIDSOMER NORTON	12
4.	ABBOTS FARM CLOSE, PAULTON	22
5.	WELLS ROAD, HIGH LITTLETON	26
6.	CAPPARDS ROAD, BISHOP SUTTON	29
7.	OTHER MATTERS AND CONCLUSIONS	31

APPENDICES:

APPENDIX 1:	REPRESENTATIONS ON THE PUBLICATION WEST OF ENGLAND JOINT SPATIAL PLAN 2016-2036
APPENDIX 2:	THICKETMEAD, MIDSOMER NORTON, REVISED LAYOUT
APPENDIX 3:	NORTHMEAD ROAD, MIDSOMER NORTON, REVISED LAYOUT
APPENDIX 4:	BOXBURY HILL, MIDSOMER NORTON, REVISED LAYOUT
APPENDIX 5:	ABBOTS FARM CLOSE, PAULTON, LAYOUT
APPENDIX 6:	WELLS ROAD, HIGH LITTLETON, LAYOUT
APPENDIX 7:	CAPPARDS ROAD, BISHOP SUTTON, LAYOUT

1. INTRODUCTION

- 1.1 These representations are made on behalf of Edward Ware Homes, who have several 'non-strategic' land interests in Bath and North East Somerset.
- 1.2 The BANES Local Plan 2016-36 Issues and Options Document has been published for consultation alongside the Publication Joint Spatial Plan for the West of England 2016-2036 (JSP). Due to the division of labour between the JSP and the BANES Local Plan, the issues and options consultation begins to set out concepts for the precise planning of the strategic development locations that the JSP identifies within BANES (North Keynsham and Whitchurch). It also represents the beginning of the process to determine apportionment of 700 dwellings on non-strategic sites, allocated to BANES.
- 1.3 Appended to these comments are our representations on the Publication West of England JSP. The examination of the JSP will determine whether the overall housing requirement, and for BANES specifically, remains as proposed. Brownfield supply will be tested, as will the deliverability of the package of strategic development locations, and the balance between strategic and non-strategic growth. We do not repeat those representations here but they led to the conclusion that for a number of reasons a greater degree of non-strategic growth may well be an outcome of the examination of the JSP.

APPENDIX 1: REPRESENTATIONS ON THE PUBLICATION WEST OF ENGLAND JOINT SPATIAL PLAN 2016-2036

- 1.4 It is understood that after this initial Issues and Options consultation (phase 1a) there will be a further element of Issues and Options consultation (phase 1b) in Spring 2018. This will cover other place-based issues and Development Management policies. Following consideration of comments on both these consultation phases, as well as further assessment work, the Council will publish its Preferred Options for consultation in Summer 2018. This will encompass greater detail on the strategic development locations, as well as smaller site allocations. The Local Plan timetable foresees a Regulation 19 consultation in Autumn 2018, with examination in Spring 2019. This timetable seems to be predicted on the JSP, as it affects BANES, being found sound with little modification, which is unlikely, based on the experience of strategic plans around the country.

- 1.5 Focusing on the period to Summer 2018, we request that the evidence base (not least the revised HEELA) is published for consultation prior to the publication on the Draft Plan.

2. SPATIAL STRATEGY OPTIONS

2.1 The 'Spatial Strategy Options' section of the Issues and Options consultation explains that a key role of the new Local Plan will be to establish how the JSP's emerging 'non-strategic growth' requirement for BANES of around 700 new homes will be delivered. Paragraph 3.06 suggests that the Council proposes site specific allocations to achieve this, as opposed to criteria based policies based on broad locations. Edward Ware Homes supports this more pro-active and certain approach.

2.2 It is the case that after two rounds of Plan-making (the Core Strategy, adopted June 2014, and the Placemaking Plan, adopted July 2017) that the Council failed to identify sufficient housing land to deliver the housing requirement 13,000 homes by 2029. Consequently, Edward Ware Homes encourages the Council to plan in full to 2036 within the new phase of plan-making.

2.3 The Issues and Options consultation demonstrates that the Council is clear that it must maximise sustainable development opportunities outside the Green Belt before seeking to justify exceptional circumstances for the removal of land from the Green Belt. This is uncontroversial. The authority on this is set down, not only in the NPPF but in *Calverton PC v Nottingham City Council High Court & Ors* [2015] EWHC 1078 (Admin) (21 April 2015).

2.4 Mr Justice Jay set out the following five matters for consideration to lead to the planning judgements as to whether there are exceptional circumstances with regard to the release of Green Belt land through the local plan process in a particular case having determined the objectively assessed need (para 51):

- *the acuteness/intensity of the objectively assessed need;*
- *the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
- *the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
- *the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
- *the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*

2.5 Determining what is the maximum level of development that would constitute sustainable development south of the Green Belt in BANES in the present plan-making context is a matter of planning judgement. This should have regard to access to employment opportunities (current and forecast) both in the immediate area and also the connectivity that is available to Bath, Keynsham and Bristol, and indeed Frome, in Mendip. In our assessment, the task at present (700 dwellings on non-strategic sites) strongly suggests that most, if not all, of the need for non-strategic greenfield development could be accommodated in non-Green Belt locations, subject to:

- The availability, suitability and deliverability of sites;
- The level of social infrastructure (notably primary school places) or availability and sustainability of land for accommodating growth.

2.6 It is likely that a very high proportion, if not all, of the non-strategic requirement will be sourced from greenfield sites. The evidence base behind the JSP presents an urban intensification allowance for large sites in Bath, and makes a District-wide allowance for small additional windfall sites¹ post 2029. No urban intensification allowance is presented in the JSP evidence base for large sites elsewhere in BANES, e.g. within the existing urban area of Keynsham or Radstock, and if such sites can be identified these would contribute to the non-strategic requirement of 700 dwellings.

2.7 However, it seems likely that if there was the requisite level of confidence in such supply, it would have been relied upon within the housing trajectory to 2029 during the examination of Placemaking Plan. Whilst occasional brownfield windfall sites (of over 10 dwellings) have been permitted since the adoption of the Placemaking Plan, it is unlikely that circumstances have changed so much so as to reveal new specific sites that can deliver by 2029 or 2036. However, it is acknowledged that circumstances may change during plan preparation during 2018.

2.8 Against this background, Edward Ware Homes notes the three broad options that are presented for the apportionment of 700 dwellings, namely: -

- 1) Continuing the existing hierarchical approach of the Development Plan with development directed to the most sustainable locations outside the Green Belt, where access to employment opportunities, facilities and services, as

¹ 9 dwellings or less

well as to public transport is best. The consultation states that this could include locations within Keynsham, at Midsomer Norton, Radstock and Westfield in the Somer Valley, and at certain larger villages outside the Green Belt with access to key facilities and services (including a primary school with capacity/scope to expand). Beyond that, it is said that other smaller non-Green Belt villages could accommodate a lower proportion of the growth.

- 2) Focussing development at a few key locations, such as on the edge of the towns; or at two or three of the larger villages. These could act as the focal points for future housing development without the need to allocate sites at the smaller less sustainable settlements.
- 3) A more dispersed approach allowing a range of smaller sites across the District at a greater range of settlements, large and small. This could include sites at all settlements outside the main urban areas.

2.9 Given the current scale of the task (700 dwellings), Edward Ware Homes rejects the need to identify sites at the least sustainable rural settlements in BANES.

2.10 Such settlements would receive some development under Option 1 and 3. Therefore the realistic options are a modified Option 1 or Option 2. Clearly, the Council regarded Option 1 as the most appropriate approach during the preparation of the Core Strategy (when the scale of the task was larger). To deviate from Option 1, the Council needs to present reasons explaining why this was no longer a sound approach. The scale of the task can form part of that reasoning, but is very clear from the tone of the issues and options document that the future co-planning of housing development with the availability of primary school places is a key driver of the current plan-making process. Core Strategy growth has pushed primary school capacity to its limit in many villages in the south of the district.

2.11 On this matter, we are concerned that there is no settlement classification policy in the BANES Core Strategy i.e. there is no 'absolute' rural settlement hierarchy based on how settlements currently perform/function. The RA.1 and RA.2 policies are not a direct substitute for this. They define places based on their capacity to receive development (with primary school capacity being a high-profile variable). However, already very sustainable rural villages would be excluded from RA.1 status if the school is full and could not be expanded. Indeed, this would and indeed does deny recognition of a village's current role in the life of the district. We suggest

that the Council combines a 'growth neutral' classification system, with additional polices then governing growth to ensure an objective assessment of the sustainability of locations.

- 2.12 Clearly, Midsomer Norton, Radstock and Westfield represent the core urban area outside the Green Belt and this area can be expected to receive a significant share of the housing requirement. This share might however, be tempered by development effects in respect of Policy NE2A (Landscape setting of settlements). We note that Diagram 6 of the consultation only refers to primary school capacity/expansion options and does not refer to these towns and thus it is assumed that even if they face the same issues as some villages, that primary school places would not be regarded as a barrier to growth i.e. a solution would be found.
- 2.13 It is interesting to note that Option 1 breaks up the concept of a Somer Valley policy area (Core Strategy Policy SV1) and refers only to Midsomer Norton, Radstock and Westfield and not Paulton & Peasedown St John. We question whether this is a signal that the later villages will be separated from a future Somer Valley Area and, if so, whether they would become RA.1 villages or, given their scale, form a new layer in the settlement hierarchy. Again, any deviation for the adopted Core Strategy so soon after its adoption would need to be clearly justified.
- 2.14 The difference between Option 1 and Option 2 is due in large part to a difference in the approach to the role of larger villages. Option 1 seems to enable all larger villages to grow, yet would target one village for primary school investment. This would mean the Council having to relax its RA.1 approach and allow travel between villages to access primary education. This would represent a move away from the current idealised approach of Policy RA.1 but this would not be unsound. By contrast, although Option 2 would also require a new primary school, the host village would be targeted for a greater degree of growth, and surrounding feeder villages to the school would be targeted to a lesser degree. Villages outside the catchment would seemingly receive no growth.
- 2.15 Either way there will need to be some degree of relaxation to Policy RA.1. If a new school is identified in one village, there is a limit to the amount of housing development that the JSP would allow to support it (499 dwellings) and the reality of the BANES Local Plan strategy might result in a lesser figure. Generally, 700 dwellings would be considered to generate 210 pupils (a new 1FE school). We

submit that for that investment to be used efficiently, it will have to receive pupils from at least 201 new homes in other places (other villages or the Somer Valley).

2.16 On this matter NPPF:55 states that:

"where there are groups of smaller settlements, development in one village may support services in a village nearby."

2.17 This embraces the principle that all needs arising from development in one village need not be met at that village. This is backed up by NPPF:29, which states that:

"The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, (our emphasis), the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas."

2.18 The NPPF offers a greater degree of flexibility for plan-making that the Council have hitherto taken-up.

2.19 Given the scale of the task Edward Ware Homes has no strong view at this stage on a modified Option 1 or an Option 2 approach. However, we believe that the Council should expect a significant uplift (at a least doubling) of the non-strategic growth requirement following the examination of the JSP. Therefore, new rural primary school capacity should be considered in more than one location as part of scenario testing in the preparation of the new Local Plan.

Sustainable Development in the Somer Valley

2.20 In the adopted Core Strategy, the Somer Valley policy area is tasked to deliver 2,400 homes² and 900 jobs between 2011 and 2029. This equates to a rate of 133 homes per year, 50 jobs per year and a ratio of 2.66 new homes per additional job.

2.21 Effectively, with the plan period in BANES being extended by 7 years, a roll forward of that rate/relationship (which has been judged to be sound) would equate to 931 more dwellings if jobs growth prospects were to increase by 350. Given that the JSP already makes a windfall allowance for small sites post 2029, the housing figure

² 1,000 dwellings at Paulton and Peasedown St John (41.6%)

of 931 dwellings effectively comes down to 800 dwellings for 2029/30 – 2036/36 for non-strategic sites of 10 or more dwellings). This is broadly the same as the merging non-strategic requirement of 700.

- 2.22 In justifying the Core Strategy, the Council noted the current imbalance of jobs to homes in the Somer Valley policy area, and its weaker employment growth prospects compared to land in the Green Belt around Bath, Keynsham and Whitchurch. Based thereon, it reasoned that additional housing growth on greenfield sites in the Somer Valley and RA.1 villages should be, to a degree, constrained. Therefore, a significant amount of the Core Strategy's residual housing requirement to 2029 was directed to Green Belt locations. However, additional housing supply was not completely constrained in the Somer Valley and a few hundred additional greenfield dwellings were planned, even though the Council could have determined that existing commitments and likely brownfield development should not have been exceeded.
- 2.23 The Core Strategy could have constrained housing growth in the Somer Valley to 2,000 homes (111 homes per year) and 900 jobs, at a ratio of 2.22:1, but it chose to increase housing supply to reduce the need for land to be removed from Green Belt.
- 2.24 The acceptance of a ratio of at least 2.66 dwellings per additional job in the Somer Valley, when a lower ratio could have been used, is a factor that should weigh in the current strategy making process. This does not lead to a conclusion that no additional jobs would result in no further housing, as the latent need for housing would remain, and the need to avoid removing land from the Green Belt would remain.
- 2.25 There are signs in the issues and options document that Peasedown and Paulton may be separated from a future Somer Valley policy area. Based purely on the Core Strategy housing trajectory Midsomer Norton, Radstock and Westfield are programmed for 1,400 dwellings 2011-2020 (77 per annum). Rolled forward over 7 years this is 539 dwellings, and less a small windfall allowance (assumed at 12 per annum)³ this would equate to 455 dwellings.

³ Roll forward of November 2016 housing trajectory

- 2.26 Thus, identifying Midsomer Norton, Radsotck and Westfield alone for around 450 would be consistent with the rate of delivery set forth in the Core Strategy.
- 2.27 Paulton and Peasdown are a special case because of the one-off redevelopment of the former Polestar printing factory, but as large villages in their own right, and subject to environmental effects and access to primary school places they too should also receive some development (under the focussed approach).

Sustainable Development in the Rural Areas

- 2.28 The adopted Core Strategy sought to direct some of the residual need for housing to rural areas, particularly the larger villages, which were allocated around 50 dwellings between 2011-2029 (2.8 per annum). A simple roll forward of this rate for the period 2029-26 would generate the scope for around 20 more dwellings, based adopted policy. However, in some cases e.g. Bishop Sutton and Temple Cloud this number has already been breached through planning appeals.
- 2.29 The appeals recognised that although the spatial strategy only required each RA.1 village to delivery 50 dwellings, it did not mean that each village was not capable of accommodating a greater level of development in the absence of a 5-year land supply.
- 2.30 In the current plan-making context in our assessment the Council should assess the degree to which there is headroom within each village for additional, proportionate growth to 2036. It should also consider whether some rural settlements might be options for an even greater level of development. In the context of the West of England JSP, a Chatfield 'light' approach might be a suitable option for one or more settlements within BANES.
- 2.31 We set out in the table below the number of dwellings in RA.1 villages in 2011, and what 'around 50 dwellings', or what has actually been permitted on large sites means in terms of growth. There is considerable variety in respect of what 50 dwellings really means for each village. For example, Farrington Gurney would grow by 13.5% whereas High Littleton and Timsbury would grow by just 4.4% and 5.9%, despite them all being within the same layer of the policy hierarchy. This is inconsistent. We do not think that a simple roll forward of the Core Strategy figure of around 50 would be a suitable approach, and it would yield only limits the supply of additional dwellings (even if primary school places were not an issue) in places that can grow to a greater degree.

2.32 For illustrative purposes, we show that if each of the selected village was permitted to grow by at least 20% for the 25-year period 2011-2036 then there is potential for around 550 dwellings.

Effects of 50 dwellings growth and 20% growth on selected non-Green Belt villages

Village	Dwellings 2011	% growth from 50 dwellings or permission on large sites	Total and additional dwellings to those permitted at 20% growth by 2036
Timsbury	1,145	4.4% 50 units enabled by the Core Strategy and allocated in the PMP.	1,374 - total 179 - additional to permissions
High Littleton	852	5.9% 50 units enabled by the Core Strategy but not yet permitted	1,022 -total 170 - additional to permissions
Clutton	637	7.8% 50 dwellings permitted	764- total 77 - additional to permissions
Bishop Sutton	565	13.4% 76 dwellings permitted	678 - total 37 - additional to permissions
Temple Cloud	487	14.3% 70 dwellings permitted	584 - total 27 - additional to permissions
Farrington Gurney	370	13.5% 50 units enabled by the Core Strategy but not yet permitted	444 - total 74 - additional to permissions
Total			564 - additional to permissions

2.33 If the housing requirement for non-strategic growth remains as low as 700 (which it may not), then not all of this 'in-principle' potential may be required in this plan period, especially given that there are reasonable site options in the Somer Valley.

There may be also reasons why this level of development cannot be identified at certain villages due to the availability of suitable sites. We also recognise as set out in paragraph 3.14 that the Council may choose to restrict proportionate housing growth in some villages, in favour of a focused/intensified growth in others. Even if Option 2 (the focused approach) is selected, we would caution against an absolute restriction of development in the other large villages. The JSP identifies that BANES perform especially poorly in respect of contingency land supply (just 100 dwellings) compared to 1,500 in South Gloucestershire and North Somerset. There is therefore some justification for enabling a more meaningful plan 'B' supply within the BANES Local Plan, if not the JSP itself.

Conclusions

- 2.34 The current housing trajectory shows that the Core Strategy housing requirement in the Somer Valley is on track to be met well before 2029. Indeed, with any additional housing allocations, this area would develop only via the development of small windfall sites for the 10 years from 2026-2036. The same can be said for the rural areas.
- 2.35 The Keynsham and Whitchurch areas will see growth from the late 2020s to 2036 and beyond based on the SDL's proposed in the JSP. Bath is of course a special case and will reach a natural stop. To maintain a geographically balanced housing development programme so that the supply of new housing does not dry up in sub-markets, the search of new non-strategic housing sites would focus on the south of BANES.

3. NORTHMEAD ROAD, THICKETMEAD & BOXBURY HILL, MIDSOMER NORTON

3.1 Edward Ware Homes is promoting three sites on the western side of Midsomer Norton at:

- Thicket Mead (A362), to the east of Tesco Old Mills;
- Northmead Road (B335), to the east of the MSN Greenway; and
- Boxbury Hill / Phillis Hill (Paulton Ward).

3.2 All three of these sites have recent planning history resulting in the refusal planning permission, and in the case of Boxbury Hill, at appeal. However, it is considered that the changing plan-making context in association with revisions to the application layouts enable the reasons for refusal to be overcome, thus justifying the sites being allocated for development in the new Local Plan.

3.3 We have strategically made the case in a district-wide sense for additional development sites to be allocated in the Somer Valley to meet housing requirements to 2036. At a more localised level, it is considered that there is no doubt that the location of each site in relation to the built-up area of the town is sustainable.

3.4 Midsomer Norton High Street (and more specifically Sainsburys) is 0.8-1.0 miles away, equating to a 20-minute walk or a 7-10 minute cycle ride, with the option of using the Norton Radstock Greenway for part of the journey; Tesco, Old Mills is a 2-5 minute walk from all the sites; and the existing business units at Old Mills, and the new Enterprise Zone at Old Mills are a 6-10 minute walk from all the sites.

3.5 In respect of suitability, all three sites have the advantage of being located outside the area that is designated under Placemaking Plan Policy NE2A.

3.6 It should be noted that the land now promoted at Thicketmead has been reduced to exclude the southern part of the former application area, save for an attenuation basin. Other things being equal, sites not covered by Policy NE2A in the Midsomer Norton and Radstock area should be selected over those that are covered by it. The Council will be aware that policy NE2A has extensive coverage in respect of many of the settlements in the south of the Green Belt.

Thicket Mead (A362) to the east of Tesco Old Mills

- 3.7 An outline planning application for a residential development of up to 72 dwellings and associated infrastructure (14/00685/OUT) was submitted in February 2014 and refused in August 2014. The illustrative site layout for that application is presented below.

14/00685/OUT: Previous Illustrative site layout



- 3.8 The reasons for refusal were as follows, and covered the need for development, landscape effects, ecological effects, and site capacity /layout.

- 1) *Site located outside of the HDB and constituted the unnecessary development of greenfield land. The form and pattern of proposed development would be unrelated to and isolated from the established pattern of development to the east and would be a clear intrusion into the open countryside. The development would detract unacceptably from the character of the open countryside and the*

setting of the Greenway which passes through the site. (CS SV1 & CP6, LP HG4 & NE.1).

2) Insufficient evidence submitted to demonstrate that there will be no harm to ecology, habitat provision and protected species, in particular harm to the conservation interests of the adjoining Site of Nature Conservation Interest and to bats of the Mells Valley Special Area of Conservation, which are likely to utilise the site and surrounds for commuting and foraging. The proposals additionally fail to demonstrate that the integrity, multi-functionality, quality and connectivity of the Strategic Green Infrastructure Network will be maintained, protected and enhanced.

3) The proposed development would result in the loss of Grade 1 agricultural land in this case whereby there is no sustainability considerations proposed of sufficient weight to override the protection afforded to the agricultural value of the land. Consequently, the development would be contrary to the guidance set out in the National Planning Policy Framework.

3.9 In our assessment, reasons for refusal 1 and 2 clearly relate to the southern part of the proposed development where the land slopes down into the Wellow Brook (an SNCI).

3.10 Subsequent to the refusal of planning permission, the Council has adopted Policy NE2A on the landscape setting of settlements. This designation covers only the southern part of the former application area.

3.11 We note that the urban design comments on 14/00685/OUT stated that:

"the northern part of the site may be capable of limited redevelopment, being previously developed land between built form and reasonably connected to local facilities and transport".

3.12 This comment relates to the farm buildings and bungalow on the site, and in the context of there being a general objection, at the time, to greenfield development beyond the HDB. In the current context, the in-principle greenfield objection falls away such that a larger development is supportable, albeit smaller than the former application.

- 3.13 We note that the landscape officer comments on 14/00685/OUT began by stating that:

"Whilst I could possibly support the development of some land occupied by the existing farm buildings, as they are a visual detractor and this could be seen as a small degree of change as mentioned above, I could not support any possible development further south than the narrow pinch point just south of the Oak tree. The land south of this point is very sensitive and gently sloping farmland with a distinctive character."

- 3.14 In this passage, the officer sets aside the HDB in his objective assessment of the landscape effects of development and recognises that undeveloped parts of the site also have a high degree of planning merit.
- 3.15 Consequently, in our assessment a reduced scheme pertaining to all the land north of the pinch point is supportable in respect of overcoming reasons for refusal 1 and 2. At Appendix 2, we present a scheme of 30 dwellings on this area, which essentially forms a large infill site between the housing development boundary and Tesco. The only development south of the pinch point would be the creation of an attenuation basin.

APPENDIX 2: THICKETMEAD, REVISED LAYOUT

- 3.16 It is therefore considered that the site should be allocated for development in the new Local Plan. The allocation policy should budget for around 30 dwellings and include placemaking principles to secure the appropriate design response. Budgeting for 30 dwellings should not mean that this figure is a cap if, at the planning application stage, it can be demonstrated that a higher figure would not prejudice adherence to the placemaking principles.

Northmead Road (B335) to the east of the MSN Greenway

- 3.17 An outline planning application (ref: 14/00672/OUT) for a residential development of up to 44 dwellings and associated infrastructure (access to be determined all other matters reserved), was submitted in February 2014 and refused in August 2014. An appeal was begun but withdrawn. The illustrative site layout for that application is presented below.

14/00672/OUT: Previous Illustrative site layout



3.18 The reasons for refusal were as follows, and covered the need for development, ecological effects, and site capacity /layout.

- 1) *Development unnecessary and therefore harm to character and appearance unacceptable.*
- 2) *Insufficient evidence submitted to demonstrate no harm to ecology, habitat provision and protected species, in particular harm to bats of the Mells Valley Special Area of Conservation, which are likely to utilise the site and surrounds for commuting and foraging (Policies NE.10 /CP6).*
- 3) *Fails to demonstrate that the number of dwellings proposed could be accommodated within the site in a satisfactory manner. The indicative layout submitted suggests that the number of dwellings proposed would cause unacceptable harm to the amenity of surrounding residents through loss of privacy and would fail to incorporate sufficient ecological mitigation. (D2, D4, NE1 and CP6).*

- 3.19 Clearly reason for refusal 1 falls away given the new plan-making context and the need to identify additional sites to accommodate 700 dwellings, coupled with the lack of sufficient brownfield supply and the need to maximise sustainable development opportunities outside the green belt. This exercise will require greenfield land and therefore will entail a degree harm to the character and appearance of selected sites. The Northmead Road site is not identified within the Policy NE2A landscape setting designation, meaning that the openness of the site was not assessed by the Council as being important to the setting of the settlement. Consequently, in comparison to many other options, harm to character and appearance would be more acceptable.
- 3.20 In respect of reason for refusal 2, a Bat and Reptile Survey (Michael Woods Associates) was submitted to the Council in January 2015 to the appeal being withdrawn, and this is available on the online planning case file. The survey recovered bat activity and found that the hedgerows on site are important features for bats (both foraging and commuting).
- 3.21 In respect of reason for refusal 2 and 3, Appendix 3 present a revised illustrative layout to illustrate between 25-35 dwellings. The revised layout enables sufficient ecological mitigation to be incorporated, particularly in respect of the southern and central hedgerows. The revised layout also reduces the impact on the amenity of neighbouring dwellings to an acceptable level.

APPENDIX 3: NORTHMEAD ROAD, REVISED LAYOUT

- 3.22 It is therefore considered that the site should be allocated for development in the new Local Plan. The allocation policy should budget for around 23 dwellings and include placemaking principles to secure the appropriate design response. Budgeting for 23 dwellings should not mean that this figure is a cap, if at planning application stage, it can be demonstrated that a higher figure would not prejudice adherence to the placemaking principles.

Boxbury Hill / Phillis Hill (Paulton Ward).

- 3.23 An outline planning application (ref: 13/04880/OUT) for a residential development of up to 124 dwellings and associated infrastructure, was submitted in November 2013 and refused in February 2014. An appeal was submitted and the decision was upheld in May 2015. However, the decision was quashed in January 2017⁴ because

⁴ [2016] EWHC 103 (Admin)

the Inspector raised matters relating to housing supply in his reasoning that were not raised at the appeal hearings. Whilst the decision as a whole is quashed there was no challenge to the inspectors reasoning in respect of site specific matters.

- 3.24 In addition, paragraph 4 of Mr Justice Holgates judgement is important to note. This states that:

"The decisions on both the Paulton and Midsomer North sites also included adverse findings on other aspects of the appeal proposals. But the Secretary of State accepts that the Inspector did not treat any of those findings as a freestanding reason sufficient to justify the dismissal of the appeals, irrespective of the Inspector's treatment of the housing land supply issues."
(our emphasis)

- 3.25 Consequently, where there is an identified need for housing, the heritage issue pertaining to the Boxbury Hill site, as set out below, is not of itself sufficient to render the site unsuitable for sustainable residential development. If the setting of the Batch was not a freestanding reason justifying the refusal of the appeal application in respect of NPPF:14 on decision taking, then logic dictates that it cannot be a freestanding reason in respect of NPPF:14 in relation to plan-making (allocation).

3.26 The illustrative site layout for the refused application is presented below.

13/04880/OUT: Illustrative site layout



3.27 The reasons for refusal were as follows, and covered heritage effects, landscape effects, and the separation of settlements:

- 1) *Development is considered to have significant harmful impact upon the setting of the adjacent Old Colliery Batch which forms part of a non-designated heritage asset (NPPF 135, CS CP6 and D4 of LP);*
- 2) *The proposed residential development and loss of this important open space, which forms an important undeveloped hillside would have a significant and detrimental impact on local character and the landscape setting of the immediate and wider area (NPPF 17 & 109, CS CP6 & CP7, LP D2, D4, NE1, NE3, and BH15);*
- 3) *Site represents an important buffer between Paulton and Midsomer Norton, contributing to the separation of the two independent urban areas. The development prejudices the separateness of these two settlements.*

- 3.28 The quashed appeal decision rejected reasons for refusal 2 and 3. However, the quashing of the decision had nothing to do with the inspector's reasoning in respect these matters.
- 3.29 Paragraphs 40-54 of the appeal decision set out the inspector's reasoning and conclusion in respect of the effect of the proposed development on the character and appearance of the area.
- 3.30 We concur with the statement at paragraph 48 that acknowledges that *"whilst the loss of this open space might be regretted by some, it would be overstating its significance to accept that it is an important open space which makes a contribution to the character of the settlement."*
- 3.31 We consider that the Inspector was right to conclude on paragraph 53 that *"the degree of harm would not be so great as to be unacceptable; development here would, for the most part, be seen as an extension or expansion of the present pattern of development, which has successfully integrated into the hillside setting of the settlement."*
- 3.32 Subsequent to the appeal decision the Council, rightly, did not consider that the site should be covered by the Policy NE2A designation within the Placemaking Plan.
- 3.33 Paragraphs 32-39 of the appeal decision set out the inspectors reasoning and conclusion in respect of the effect of the proposed development on the separate settings of Midsomer Norton and Paulton. He concluded that he did not consider *"that the proposed scheme would, to any practicable or material degree, in either physical or social terms harm or diminish the separate settings of Paulton and Midsomer Norton."*
- 3.34 Reason for refusal 1 was upheld in the quashed appeal decision and therefore the impact of residential development on the setting the undesignated Batch is the only suitability matter to be weighed in the planning balance.
- 3.35 It should be recognised that the Inspector considered harm to the setting of the batch in the context of his quashed reasoning that the Somer Valley area had a 'disaggregated' 5-year land supply at the time of his decision. In his view, this meant that the benefits of the proposal did not sufficiently and demonstrably outweigh the benefits as, in his view, there was no need for the harm.

- 3.36 However, circumstances have changed with the introduction of the JSP and there is a need for additional housing, and moreover a need to maximise sustainable development outside the Green Belt.
- 3.37 In response to the Inspectors reasoning, Edward Ware Homes have revised the scheme for the site and the number of homes proposed has been halved, with a focus on development on the western and eastern parts of the site, with the central area left open and underdeveloped.

APPENDIX 4: BOXBURY HILL, REVISED LAYOUT

- 3.38 Given the refreshed need for housing and the associated need to maximise non-Green Belt options, the site can be allocated with justified 'limited' harm in respect of landscape, visual and settlement separation matters, and not enough harm affect 'suitability'. The impact of development on the setting of the Batch, even at 124 dwellings is not a freestanding reason to render the site unsuitable for development. However, a lower level of development and a heritage-led urban design strategy to reduce the level of harm and make the site very competitive in a comparative assessment of alternatives.
- 3.39 It is therefore considered that the site should be allocated for development in the new Local Plan. The allocation policy should budget for up to 60 dwellings and include placemaking principles to secure the appropriate design response based on a split development concept. Budgeting for 60 dwellings should not mean that this figure is a cap, if at planning application stage it can be demonstrated that a higher figure would not prejudice adherence to the placemaking principles and high quality design.

4. ABBOTS FARM CLOSE, PAULTON

4.1 An outline planning application (13/03547/OUT) for a residential development of up to 47 dwellings and associated infrastructure, was submitted in August 2013 and refused in January 2014. An appeal was submitted and the decision was upheld in May 2015. However, the decision was quashed in January 2017 because the Inspector raised matters relating to housing supply in his reasoning that were not raised at the appeal hearings. We refer again to paragraph 3.25 of these representations in respect of the issues pertaining to the site not presenting a freestanding reason for refusal (or in the current context, allocation), where there is an identified need for housing - albeit we acknowledge that primary school children do need somewhere to go to school within a reasonable distance, if not within the village itself.

APPENDIX 5: ABBOTS FARM CLOSE, PROPOSED LAYOUT

4.2 The single reason for refusal was as follows:

1) The proposed development of the site, due to the lack of local primary education places, is contrary to the principle of sustainable development and would be likely to result in unsustainable transport movement by private cars. (T1 & CF3 of BANES LP)

4.3 The inspector's reasoning and conclusion in respect of the whether development would be 'sustainable' in light of the need for trips to be made beyond Paulton to access primary school places, is found at paragraphs 32-45 of his decision. His conclusion was affected by his quashed reasoning that there being a 5-year land supply in the Somer Valley, rendered development unnecessary and the environmental effects (albeit minor of transporting around 14/15 pupils) avoidable.

4.4 In his conclusion, he also stated that "*if there were an overriding need for further housing land in Paulton, these would be factors which would weigh in favour of granting permission.*" There is now an overriding need for additional development in the district, and an associated need to optimise the use of non-green belt opportunities in accommodating, at present, 700 dwellings. Paulton forms part of the Somer Valley cluster of settlements outside the Green Belt, this being the most sustainable strategic location/policy area outside the Green Belt. Logically this area should be a focus for accommodating much of the additional housing that is needed.

- 4.5 Although a village, Paulton is not subject to policy RA.1 (rather SV.1), and therefore there is no requirement for primary school capacity to be available in the village. Consequently, it would be sustainable for children from the development site to go to school elsewhere in the Somer Valley or in capacity generated by the development of new primary school places at, for example, Clutton or High Littleton.
- 4.6 Since the appeal decision, the Council has also refused (in June 2017) an application to change part of the outline application for the former Polestar factory from a continuing care retirement community of 210 C2 and C3 units, to 73 dwellings.
- 4.7 The first reason for refusal states that:
- 1) *The proposed development, due to the generation of pupils in excess of the local primary school capacity, would represent an unsustainable form of development which would lack access to the necessary supporting infrastructure, would increase the reliance upon motor vehicles at the expense of walking/cycling and would have detrimental social implications. The proposals are therefore contrary to the development plan, the emerging plan and the NPPF, in particular policy CP13 of the Bath and North East Somerset Core Strategy, policy T.1 of the Bath and North East Somerset Local Plan and policies LCR3A and ST1 of the emerging Bath and North East Somerset Placemaking Plan.*
- 4.8 The decision was made in the context of BANES stating that it had a 5-year land supply and therefore, no housing shortage. The wording would appear to update the reason for refusal relating to Abbots Farm Close, albeit Policy T.1 (Overarching Access Policy) of the BANES Local Plan has since been superseded by ST1 (Promoting Sustainable Development) of the Placemaking Plan.
- 4.9 Again, we repeat that this approach only holds true where there is no identified need for housing. Where such a need returns (either through plan-making or 5-year supply matters) that the absence of primary school places in Paulton is not a standalone reason for non-allocation, if places are available elsewhere. Abbots Farm Close should be comparatively assessed against all other site options and not dismissed outright.

- 4.10 In addition, given that there is brownfield family housing capacity in Paulton (in the absence of demand from retirement housing operators to come forward with proposals on the former Polestar site), equivalent to 73 dwellings, it would appear to be necessary for the Council to find a solution for unlocking that capacity. Once this is achieved the solution will also unlock Abbots Farm Close.
- 4.11 Finally, there was no site-specific reason for refusal on environmental grounds, meaning that the site is suitable for the proposed development. However, since the appeal decision, Policy NE2A has been adopted and the associated proposals map designation covers the site. It is considered that this is erroneous in respect of Abbots Farm Close, given that landscape or landscape setting did not form a reason for refusal. It does not matter that Policy NE2A was not adopted at the time of refusal. The issues were still capable of being raised under existing landscape policies as for Boxbury Hill re the use of NE1.
- 4.12 However, NE2A is not a blanket ban on development. Rather it requires "*any development within designated areas to conserve and enhance the landscape setting of settlements and their character, views and features*". Only "*development that would result in adverse impact to the landscape setting of settlements that cannot be adequately be mitigated*" will be refused.
- 4.13 Given the wide geographical coverage of policy NE2A, there will be a spectrum of sensitive areas on the edge of settlements that contribute to the settings to various degrees. There will be parcels of land that have less sensitivity and they will be more appropriate to satisfy the policy framework. Abbots Farm Close in one such location. There is sufficient evidence from the determination of the former application to make this judgement and this should be reflected in the HEELA.
- 4.14 Firstly, there was no landscape reason for refusal, let alone any landscape objection, subject to conditions. Secondly, although the landscape officer stated that development would have a landscape impact, it was noted that the site is relatively well contained in landscape terms, with housing development to the east and north, and this harm is not considered to outweigh the benefits of development. Some detailed concerns were raised by the landscape and tree officer; however, the illustrative layout was revised to ensure a buffer between the western boundary and the housing that was proposed.

4.15 It is therefore considered that the site should be allocated for development in the new Local Plan. The allocation policy should budget for around 45 dwellings as no revisions are needed to the refused application, and include placemaking principles to secure the appropriate design response. Budgeting for 45 dwellings should not mean that this figure is a cap, if at planning application stage it can be demonstrated that a higher figure would not prejudice adherence to the placemaking principles.

5. WELLS ROAD, HIGH LITTLETON

- 5.1 Edward Ware Homes control around 4ha of land south of Wells Road, High Littleton as identified in Appendix 6.

APPENDIX 6 INDICATIVE CONCEPT PLAN

- 5.2 The site has been the subject of two previous outline planning applications (14/00038/OUT & 15/01639/OUT) for residential development of up to 71 dwellings. Both applications were refused for similar reasons in relation to the impact of the development within an edge of settlement location in the open countryside and inadequate provision of local primary school places.
- 5.3 The revised proposals as shown indicatively on the concept layout at Appendix 6, show a reduction in the proposed built form to circa 50 units as well as the on-site provision of a 1FE entry primary school.
- 5.4 High Littleton is an RA.1 village identified for the development of 50 dwellings on large sites from 2011-2029. Only one substantial site has been granted planning permission for 9 dwellings but this has not yet been developed, the Core Strategy requirement for the village amounts to just 7.8% growth over the Core Strategy period 2011-29.
- 5.5 In our assessment, 20-25% growth from a 2011 baseline to 2036 would equate to 170-213 dwellings (161-204 more than permitted). This range is the minimum level of additional development that could be directed to the village.
- 5.6 In our assessment, there is potential for the village to accommodate a level of housing between 170 dwellings and 213 dwellings as part of the focused approach of the Issues and Options consultation. This would be accompanied by a new 1FE primary school for the village (in addition to the current school) or a replacement 2FE primary school.
- 5.7 The land around the village is designated under Policy NE2A (Landscape setting of settlements) exception of very small parcels of land around the settlement edge. The Edward Ware Homes site sits wholly within this designation.
- 5.8 The Issues and Options document identifies that the primary school in High Littleton is at capacity and cannot be expanded due to the constrained nature of the site. There is scope within the land controlled by Edward Ware Homes to deliver at least a 1FE entry primary school which would increase the capacity.

- 5.9 Planning at the upper end of the range 170-213 would make the most efficient use of a further 1FE of primary school capacity in the village. This level of development would generate around 150 primary aged children. To make the most efficient use of the new space the Council would need to relax policy RA.1 to enable around 60 children from surrounding villages to also be accommodated. As presented, RA.1 is 'idealised' in respect of the insistence that children living in a village must be able to attend a primary school in the same village. Ultimately this policy will stop any development in the RA.1 villages unless demographic shifts enable places to become available.
- 5.10 The presentation of a focused approach to development in the Issues and Options consultation goes hand in hand with a recognition that clusters of villages are able to share services and facilities.
- 5.11 Although 499 dwellings is possible under the definition of non-strategic growth in the JSP, Edward Ware Homes currently assess that a development of 50 units on the land identified in Appendix 6, together with additional primary school capacity, represents a deliverable package, and to enable the sustainable growth of the village westward.
- 5.12 Ultimately, we are of the view that if development is to take place in this area that a confident medium and long-term approach should be taken.
- 5.13 We would like to work with the Council to explore some of the development options for the site including the school's organisation manager to discuss primary school options, alongside the Midsomer Norton Schools Partnership and the Headteacher of High Littleton.
- 5.14 Edward Ware Homes believe that on-site provision in this location will work well but will be guided by the Council, the school and the Trust.
- 5.15 Additional primary school capacity in this part of BANES, in conjunction with a relaxation of policy RA.1 could unlock development potential in other villages where land for housing, but not land for education can be identified. We do not have sufficient data to test potential outcomes, but it could be the case that children from High Littleton currently attending Cameley (Temple Cloud) could go to school in the village, thereby enabling children from developments in Clutton, Hallatrow or Paulton to attend Cameley. We expect the Council to test some of the potential implications when formulating the draft Plan.

- 5.16 Most new residents will either wish to travel north along the A39 to Bath for work or alternatively connecting to the A37 and onwards to Bristol, or south to Norton Radstock, including, in time, new jobs in the Enterprise Zone at Old Mills. The Whitchurch urban extension will become a source of employment and will host a park and ride for travel further into the Bristol. Midsomer Norton is within cycling distance of High Littleton.
- 5.17 Diagram 6 of the Issues and Option Document identifies that the A39 benefits from a moderate public transport facility which connects into the A37 which itself benefits from a frequent service which serves Bristol.
- 5.18 Edward Ware Homes intend to meet with High Littleton and Hallatrow Parish Council to discuss the options for the site and believe a without prejudice meeting with the planning policy team would be constructive to discuss this new opportunity.
- 5.19 It is therefore considered that the site should be allocated for development in the new Local Plan. The allocation policy should budget for up to 50 dwellings, and up to around 1.8ha of land for a 1/2 form entry primary school. Budgeting for 50 dwellings should not mean that this figure is a cap, if at planning application stage it can be demonstrated that a higher figure would not prejudice adherence to the placemaking principles.

6. CAPPARDS ROAD, BISHOP SUTTON

- 6.1 The Council should also be familiar with the proposed site for up to 32 dwellings at Cappards Road, Bishop Sutton, due to the Secretary of State (SoS) decision in September 2016
- 6.2 As indicated in our overview appraisal of the headroom for development at the larger villages, around 20% growth from large sites at Bishop Sutton for the 25-year period 2011-2035 would equate to 113 dwellings. To date 76 dwellings have been completed, leaving some headroom for another 37 dwellings
- 6.3 The residual land at Cappards Road is the clear front runner for that development at Bishop Sutton. The planning history of the site demonstrates that there are no environmental reasons affecting the sites suitability. Further, the SoS decision noted that "the village has capacity in terms of facilities and services" (para 23). The only reason the application was refused by the SoS was in defence of a recently adopted Neighbourhood Plan under the guise of development unacceptably prejudicing the implementation of the CS in respect of the balance between homes and jobs in the south of the District.
- 6.4 However, due to the changing planning policy context and the need to identify an additional 700 units over an extended plan period to 2036, the issue of 'balance' can again be re-evaluated. In this context, the JSP directs around 2,900 dwellings to Whitchurch and Keynsham to 2036 and assumes a further 300 dwellings within Bath. There is therefore good reason in respect of achieving a geographically balanced strategy, for additional non-strategic growth to be delivered through sustainable development opportunities outside the Green Belt, otherwise the operation of the housing sub-market in the south of the district will be harmed with little new build from around the mid-2020s.
- 6.5 In this context, if growth was to be directed to Bishop Sutton, the adopted Neighbourhood Plan would have to give way to higher order, more recently adopted planning policy.
- 6.6 The residual land at Cappards Road presents a clear-cut opportunity. It is recognised that a comparative assessment will need to take place in respect of other potential non-green belt sites in the Somer Valley and at other villages. In this regard, a key strength of the Cappards Road site is that it is not designated under Policy NE2A as contributing to the landscape setting of Bishop Sutton. The

development of another 30 dwellings would also be 'proportionate' over the extended plan period.

6.7 We note that Diagram 6 of the Issues and Options document identifies that the primary school in Bishop Sutton is either full, projected to be full and cannot be expanded within its site.

6.8 This is at odds with the recent SoS appeal decision, which stated at para 11.50 that:

"The local school can accommodate any additional pupils, subject to an appropriate contribution from the developer [7.234] through a payment in accordance with the Council's CIL. There would not, therefore, appear to be any significant problems in terms of overloading the existing community infrastructure of the village."

6.9 The Council should therefore explain why circumstances have changed and provide more detailed evidence of current and projected pupil numbers and explain the technical reasons why the school could not be expanded if needed.

6.10 Even if the Council's assessment is shown to be valid, we assess that development at Cappards Road, in association with that as proposed at Clutton could form part of a focused approach to rural development. If the development concept for Clutton to the west of the A37 is embraced it would result in new primary school capacity that would not be entirely filled by even a maximum level non-strategic development at the village. To make efficient use of the additional capacity would require pupils to enrol from additional development in neighbouring villages. There is therefore scope for a focused /clustered strategy centred on Clutton, but in association with development at Bishop Sutton and other villages in reasonable proximity. It is but a 2.6 mile, 5-minute drive from Bishop Sutton to the proposed site at Clutton, and although driving instead of walking is not ideal, it would result in a very short trip.

7. OTHER MATTERS AND CONCLUSIONS

- 7.1 Whilst we do not repeat the bulk of our representation on the West of England JSP, there are a couple of matter of particular relevance to BANES, that if not dealt with through the examination of the JSP, could be raised in the examination of the BANES Local Plan.

Existing Commitments

- 7.2 Having regard to the housing trajectory for the Core Strategy period to 2029 there are risks in respect of the full delivery of Bath Western Riverside and Sydenham Park. It is considered that Western Riverside will ultimately come forward by 2036, but Sydenham Park, which is allocated for 500 dwellings (200 affordable dwellings) is a considerable risk and represents an aspirational allocation as opposed to a site where there is any evidence of realistic long term developability.
- 7.3 'Bunnings' are making a long-term investment in the former Homebase estate and much of the site is owned by Sainsbury's, which requires it for car parking for its Green Park store. The mixture of existing use values, long leases and limits on height render reliance on this site extremely high risk, even to 2036.

Contingency

- 7.4 The West of England JSP embraces the concept of contingency strategic locations and other supply of 3,100 dwellings, to be released at plan review to achieve the housing requirement to 2036 if it appears that this is at risk. This is addition to flexibility; this being the 3,300 dwellings that are to be planned for immediately, over and above the actual housing requirement of 102,200.
- 7.5 Because of a calculation error in the SHMA (in respect if not allowing for vacancy and second homes) the actual housing requirement does in fact claim the flexibility component too. This has the knock-on effect of making the contingency supply the flexibility component, thus leaving no actual contingency. To correct this, on this terms of the JSP, another 3,100 dwellings need to be sourced, albeit the scale of the matter is rather superseded by more profound issues identified with the SHMA and the baseline housing requirement.

- 7.6 Nevertheless, in the JSP as written North Somerset as a contingency of 1,500 dwellings (6% of its housing requirement of 25,000). South Gloucestershire also as a contingency of 1,500 dwelling (4.6% of its housing requirement of 32,500). Broadly speaking this is around 5% and equivalent to one year's supply for a 20-year plan period. For understandable reasons, Bristol has no contingency as it is maximising what can be achieved within its housing of 33,500.
- 7.7 BANES have a rather underwhelming contingency of 100 dwellings (0.6% of its housing requirement of 14,500). A more reasonable contingency of at least 5% would equate to around 710 dwellings.

Affordable Housing Delivery

- 7.8 The adopted Core Strategy contains a policy target for 3,290 affordable dwellings for the period 2011-2029, of which 410 relate to backlog in respect of underperformance against the Local Plan 1996-2011, and 2,880 (160 per annum) relate to newly arising need post 2011. This squares with the latest Bath SHMA for the JSP (155 per annum).
- 7.9 Therefore, the ambition to 2029 in the adopted Core Strategy remains valid. From 2011/12 - 2016/17, 1,281 affordable homes have been built in BANES (JSP Topic Paper 1, Diagram 2). This leaves 2,009 more homes to secure over the next 12 years. One needs to check if the JSP and the BANES Local Plan will enable this.
- 7.10 BANES have not published a housing trajectory since November 2016. This included data showing a projected supply of 3,205 affordable dwellings for the plan period 2011/12-2028/29 (a deficit of 85 against the target). Since this time the regeneration of the Foxhill estate has been permitted and this will result in net loss of 204 affordable dwellings, increasing the shortfall to 2028/29 of 290 dwellings.
- 7.11 In addition, for the 7 years post 2029, BANES should really be delivering another 1,085 affordable dwellings to maintain the rate of delivery required by the Core Strategy in respect of newly arising need. Anything less would equate to reduction in ambition. To its credit, it is evident from BANES Local Plan Issues and Options consultation that it is planning for 3,100 affordable homes to 2036 (100% of the SHMA need). However, it is still necessary to meet the adopted 2029 target en-route to 2036.

7.12 Added together, the underlined figures generate a need for 1,375 affordable dwellings. Having regard to the JSP:

- Whitchurch, if it delivers 1,600 total dwellings to 2036 will yield 480 affordable homes, at 30%;
- North Keynsham, if it delivers 1,400 total dwellings to 2036 will yield 420 affordable homes, at 30%;
- Non-strategic growth, if this delivers 700 dwellings to 2036 will yield 210 dwellings, at 30%;
- This totals 1,100 affordable dwellings;
- Based on Topic Paper 1, 15% of small windfalls in BANES of 672 (TP2, Annex 1), will yield 100 units and lifting supply to 1,200;
- Therefore, over the whole JSP period the shortfall will be 175 affordable dwellings, which at 30% provision would require another 583 total dwellings to correct;
- Moreover, having regard to the housing trajectory of the JSP, the SDLs will deliver 45 affordable dwellings by 2028/29 the Core Strategy end date), non-strategic growth could all come forward, yielding 110 dwellings by 2028/29 and the small windfalls nothing (as they are all post 2028/29). This is 155 affordable dwellings;
- Therefore, the new supply proposed in the JSP will not be sufficient to correct the shortfall of 290 affordable homes for the Core Strategy period to 2028/29. A residual deficit of 135 will remain, requiring 450 total dwellings to correct, at 30% provision;
- As part of this analysis we have not discounted 200 affordable swellings from the 500 total units proposed for Sydenham park in the Placemaking Plan. The prospect of this site delivering anything by 2028/2029 and subsequently to 2036, is minimal.

7.13 Our conclusion is that, simply on the basis of meeting adopted affordable housing requirements to 2028/29, the non-strategic growth figure for BANES should be uplifted by 450 dwellings, from 700 dwellings to 1,150 dwellings. If Sydenham Park is not developable, then a further land supply adjustment will be needed within the JSP for BANES.

APPENDIX 1

REPRESENTATIONS ON THE PUBLICATION WEST OF ENGLAND JOINT SPATIAL PLAN 2016-2036



REPRESENTATIONS ON THE PUBLICATION WEST OF ENGLAND JOINT SPATIAL PLAN 2016-2036

EDWARD WARE HOMES

LAND AT WOODHOUSE DOWN, ALMONDSBURY

Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

T 01454 625945 | **F** 01454 618074 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	POLICY 1: THE HOUSING REQUIREMENT	2
3.	POLICY 2: THE SPATIAL STRATEGY	16
4.	POLICY 3: THE AFFORDABLE HOUSING TARGET	24
5.	POLICY 4: THE EMPLOYMENT LAND REQUIREMENT	27
6.	POLICY 6: STRATEGIC INFRASTRUCTURE REQUIREMENTS	28
7.	POLICY 7: STRATEGIC DEVELOPMENT LOCATIONS	29
8.	POLICY 7.1: NORTH KEYNSHAM & POLICY 7.2: WHITCHURCH (BANES)	34
9.	POLICY 7.3: LAND AT BATH ROAD BRISLINGTON (BRISTOL)	38
10.	POLICY 7.4: BACKWELL & POLICY 7.7: NAILSEA, (NORTH SOMERSET)	39
11.	POLICY 7.5: BANWELL & 7.6: CHURCHILL (NORTH SOMERSET)	41
12.	POLICY 7.8: BUCKOVER, 7.9: CHARFIELD & 7.11: THORNBURY (S. GLOS)	44
13.	JSP CHAPTER 5: DELIVERY AND IMPLEMENTATION	45

APPENDICES:

APPENDIX 1:	COMPARATIVE TABLE OF JSP STRATEGIC DEVELOPMENT LOCATIONS
APPENDIX 2:	COMBINED HOUSING TRAJECTORY FOR JSP STRATEGIC DEVELOPMENT LOCATIONS
APPENDIX 3:	ESTIMATED COSTS OF SCHEMES IN THE TRANSPORT VISION
APPENDIX 4:	LAND AT WOODHOUSE DOWN, ALMONDSBURY SITE PLAN AND ASSESSMENT

1. INTRODUCTION

- 1.1 These representations are made by Edward Ware Homes in response to the Publication West of England Joint Spatial Plan and the accompanying evidence base.
- 1.2 Edward Ware Homes understand that the JSP examination is intended to determine whether or not a plan is sound and not to adjudicate between competing proposals that are not included in the plan ('omission sites'), strategic or otherwise. Nevertheless, as the spatial strategy (including contingency land) will be contested, it will be necessary for the Inspector to have knowledge of the credentials of all strategic development options, in order to determine whether the portfolio of proposed strategic development locations is appropriate against alternative groupings, in respect of sustainability and deliverability, and whether the balance between strategic supply and non-strategic supply is also appropriate, given the nature and quantum of the supply that is available.
- 1.3 In addition, given that the housing requirement is contested and that the contribution of brownfield supply to the spatial strategy is contested, it is our view that there will need to be a modifications stage for the JSP, and it is informative for the Inspector to have early knowledge of alternative strategic sites and the total quantum of non-strategic supply available.
- 1.4 To this end, whilst our representations directly focus on the JSP, we present in appendices the site at Land at Woodhouse Down, Almondsbury to which these representations relate. Clearly, if there is a modifications stage to the examination, the merits of alternative land supply will be assessed in greater detail by the Councils, subject to the Inspectors feedback.

2. POLICY 1: THE HOUSING REQUIREMENT

2.1 The evidence base justifying Policy 1 of the JSP on the housing requirement is:

- The Bristol Strategic Housing Market Assessment (June 2015)
- The Bath Strategic Housing Assessment (June 2016)
- The West of England Housing Target Paper (September 2016)
- Topic Paper 1 of the Publication JSP (November 2017)

2.2 Given the existence of two SHMAs covering the plan area, the West of England Housing Target Paper (September 2016), provided an overall view of the OAN across the plan area, and made some adjustments to the raw outputs of each original SHMA. The authors (Opinion Research Services) acknowledged that their Target Paper's status was somewhat 'interim' pending a full and more detailed update of the SHMA for both HMAs that would be published during summer 2017. No such update has taken place and there is no acknowledgement or explanation of this in Topic Paper 1 accompanying the Publication JSP. We have no doubt that the Inspector will ask 'why' this is the case and explore the reasons for this. One reason might relate to new, higher, employment forecasts for the West of England and their effect on the need for housing. We refer to the implications of these in subsequent sections.

The Housing Market Area

2.3 The SHMAs and the September 2016 Housing Target Paper present a comparable set of outputs for both a Bristol HMA and a Bath HMA. We do not dispute the operation of two housing market areas in the West of England, but note that the Bath HMA is 'marginal' as a stand-alone HMA and is closely related to the Bristol HMA.

The OAN and the Housing Requirement

2.4 Paragraph 25 of The West of England Devolution Deal¹ states that the West of England Combined Authority will set an ambitious target for delivering new homes for the period 2016-2036. When a choice is to be made between forecast assumptions, those that reflect an ambitious rather than a conservative response to the housing crisis should therefore be selected.

¹ which excludes North Somerset.

- 2.5 The proposed baseline OAN of 97,800 dwellings, increasing to 102,200 dwellings once institutional elderly housing needs are considered, does not reflect the identification of housing as a 'critical issue and strategic priority'. In our assessment, it does not reflect the full need for housing, and we present our case in the paragraphs that follow.
- 2.6 Submission of the Joint Spatial Plan is in advance of the March 2018 threshold for the proposed automatic imposition of the standard methodology from CLG on the calculation of local housing needs². In our view, any suspension in proceedings at examination stage should automatically trigger the need for the standardised methodology to be planned for as a minimum. There are signs that the standard methodology will generate higher starting points for housing requirements in England and some local authorities when published in its final form. The standard method will also require local adjustments to take account of local market signals, affordable housing needs and specialist housing needs.
- 2.7 'Planning for the Right Homes in the Right Places' generates a starting point figure for housing needs in the West of England of 116,000 dwellings for the period 2016-2036, within the context of a 'control' figure for England of 266,000 dwellings per annum. It is implausible for the West of England authorities to claim that they are being ambitious in addressing the critical issues of the plan if they are not being proactive in planning for this figure, as a minimum.
- 2.8 In the Budget 2017, the Chancellor subsequently set out the Government's ambition to achieve the delivery of 300,000 net additional homes each year from 2020.
- 2.9 In our representations on the November 2016 version of the JSP, we highlighted that in July 2016 the House of Lords Select Committee on Economic Affairs published 'Building More Homes'. It concluded that for the foreseeable future, to address a structural backlog as well as meeting newly arising need, at least 300,000 homes should be built each year. In Oral Evidence, Dame Kate Barker agreed with this figure:

"I can see that you have Geoff Meen³ sitting on your right. Since I have always used Geoff's numbers as my guide to what should be done, I would say that if the objective over the next

² Planning for the right homes in the right places (CLG, 14th September 2017)

³ Professor Geoff Meen, Department of Economics, University of Reading

five years is to keep the affordability of housing no worse than it is today, or even to lower it a little bit, we would probably need to be building around 300,000 houses a year or in excess of that. We would also have to build them in places where there is demand. Obviously, if we built them all around Sheffield it would not be very useful. If we spread them around the country, particularly in places of high demand, it would be more useful. It would be numbers of that order."

- 2.10 In the Budget 2017, the Chancellor adopted the advice of this Committee to adopt a target of 300,000 homes per annum from 2020. Prior to this (and after the consultation on the standard method was published), Sajid Javid confirmed that he saw need in the range 275,000-300,000 per annum.
- 2.11 The national 2014-based household projection for 'England' for 2016-36 is 211,700 households per annum and this converts to a demographically-led dwellings projection of 220,450. This conversion is made via the application of a vacancy and second homes rate derived from the 2011 Census. Consequently, 'Planning for the right homes in the right places' represents a 25% uplift against the national household projection and a 20% uplift against the national dwellings projection. This is of course an average for England as whole, with some areas experiencing higher or lower degrees of uplift based on local affordability⁴.
- 2.12 The West of England's contribution to the 'Right Homes, Right Places' figure of 266,000 per annum is 5,800 per annum (2.18%). The figure of 5,800 homes per annum compares with a 2014-based household projection of 4,550 per annum, which converts to a dwellings projection of 4,700 (with the addition of 3.5% for second homes and vacancies). In the plan area, the effect of the standard methodology is a 27% uplift in the household projection and a 23% uplift in the dwellings projection. This indicates above average affordability stress of 2-3 percentage points. The Government formula generates a minimum housing need figure of 116,000. It is not clear if this is inclusive or exclusive of the institutional elderly homes component of the West of England Housing Target Paper of 4,400 homes. We suspect that it does not include this component of need.

⁴ Using median ratios of income to prices

- 2.13 In adopting a figure of 300,000 new homes a year, the Chancellor essentially recommends a 41.7% uplift on the latest household projection for England, or a 36% uplift to the dwellings projection. This would make some contribution to addressing backlog, meet newly arising needs and have a meaningful effect on price inflation, and help to improve affordability. If a 41.7% uplift is applied to the West of England household projection of 4,550 per annum, it generates a figure of 6,447 households per annum (6,672 dwellings per annum). Over 20 years this generates a requirement for 133,000 dwellings (probably net of institutional elderly homes component).
- 2.14 These observations provide support for a figure between 116,000 and 125,000 dwellings as the starting point for housing requirements, before considering affordable housing needs and employment forecasts.
- 2.15 The latest household projections need a significant adjustment to enable a sustainable housing future. The current level of market signals uplift that is proposed in the SHMA is reflective of the approach taken in other examinations, but these are not sound benchmarks.
- 2.16 The local justification for a significant uplift is set out in the paragraphs that follow and relates to:
- backlog for 2012-2016;
 - unsubstantiated adjustments to 10-year population trends for 2005-2015;
 - further suppressed formation rates in the 2014-based projections;
 - a more precise analysis of the nature of the labour force that will be generated from planned growth of 105,500 homes to match 82,500 jobs, i.e. its age profile, skills, working patterns and how this meets the needs of planned for sectoral growth;
 - evidence justifying a higher job growth target in the plan;
 - the lack of a vacancy/second homes rate allowance in figure 3 of the housing target paper to convert the baseline household projection of 88,400 into a baseline dwellings projection.

- 2.17 The SHMAs on which the JSP is based have not yet been updated to reflect the latest population and household projections. The latest household projections were published in July 2016 and therefore there is no reason why the evidence base could not have been fully updated (as intended in the September 2016 Housing Target Paper) to inform the Regulation 19 consultation. In our December 2016 representations, we encouraged the Councils to publish a full update of the SHMAs early in 2017 (and still within a Regulation 18 environment), hold a workshop and undertake a further sensitivity testing exercise prior to the Submission Plan being developed for political sign-off. This has not taken place.
- 2.18 The SHMAs and the Housing Topic Paper represent a process of demographic checking rather than economic research. Figure 3 of the Housing Topic Paper settles on a figure of 88,400 as the household projection for the plan area (against an official 2014-based projection of 88,200). Therefore, all it really does is say that CLG's projection is about right, as a projection⁵. We explain some of our issues with this figure later, but for now it is sufficient to acknowledge that the Housing Target Paper does not diverge from the official projection.
- 2.19 Whilst the SHMAs present market signals indicators, they do not represent research into an economic problem to determine what corrective action should be taken. What is missing from the SHMA is an economic analysis of what is needed and why. Suggesting that the Bristol market signals uplift should be 10% and the Bath uplift 15% by comparing indicators with Cambridge, and the Cheltenham/Gloucester Joint Core Strategy, is not adequate. It is simply a benchmarking exercise.

Population Projections – Net Migration Assumptions

- 2.20 Population projections are a key driver of the OAN, and net migration projections are the key variable. As we have shown, the central national net migration projection (of 180,000) is not reflective of the trends since 2004 (250,000) by a significant margin and this gap is therefore locked into local authority projections.
- The 2012-based projections for the Plan area assume net migration of **3,570** per annum;

⁵ i.e. if you simply accept the household representative rates, forget about why they are as they are, and accept that they are pinned to net migration for England of just 180,000 per annum

- The 2014-based population projections for the Plan area assume net migration of **4,051** per annum;
- The 10-year net migration trend for the period 2001-2011 was **4,490** per annum; whereas
- The 10-year trend net migration for the period 2005-2015 was **5,210** per annum;
- Paragraph 20 of the Housing Target Paper reduces the 10-year trend for 2005-15 to **4,840** per annum. This adjustment largely relates to observations about BANES.

2.21 We are not satisfied with the explanation for this adjustment in the Bath SHMA in relation to 'local administrative sources' and that an adjustment on this basis should be made. The ONS will be aware of these sources of information but has chosen not to apply them to their projections in the way proposed in the Housing Target. The increased migration to BANES results from a significant boost to housing delivery since 2012 and the growth of the universities.

2.22 In an ambitious approach to plan-making, a trend migration figure of not less than 5,210 net movements should be applied in the SHMA for the plan area. This will also have positive benefits for the balance between workers and jobs, the need for which is set out later in this section. This figure should be paired with the 2012 and 2014 headship rates and the effect of an indexed return to past rates as part of a sensitivity testing process.

2.23 Given that the Bath SHMA is said to include the housing needs of students, it is especially important to capture these additional net movements from the most recent 10-year migration trend. Historically, increases in 18-22 year olds in BANES have been greater than projected, meaning that the universities have been growing at a greater rate than suggested by the population projections. For this reason, the BANES Core Strategy sought to disentangle student housing needs from other housing needs, so that the main part of the BANES Core Strategy SHMA was net of students, and a separate student needs housing paper was prepared as an extra component of need (within the framework of the concept of a SHMA). It is not clear why this refined Core Strategy approach to assessing this specific need has been set aside within the JSP process. This

approach reduces the understanding of a significant issue in BANES which had previously justified special attention.

- 2.24 CLG's 2012-based and 2014-based household projections for 2016-36 are very similar in their outputs of 87,900 households and 88,200 households respectively. Figure 3 of the Housing Target Paper, presents a projection of 88,400 households, which is comparable. However, this is arrived at by making an upward adjustment of 3,100 households⁶ to the previous combined SHMA figure of 87,800 households (increasing it to 90,900 households), before making a downward adjustment of 2,500 households by the application of the 2014-based household representative rates (as opposed to the 2012-based rates). The headline figure is therefore 88,400 households.
- 2.25 In our assessment, this headline figure is a suppressed one, given the unexplained adjustments that have been made for BANES and also given the application of the 2014-based household representative rates which reflect housing market stress. This stress needs to be corrected to a greater or lesser extent by market signals adjustment.
- 2.26 Comparison between the 2012-based and 2014-based household projections masks an important difference. Whilst the latest household projections are 1% higher, the underlying population projections are 8% higher. This implies that the latest projections are based on a slower rate of decline in average household sizes, which indicates further 'stress' in the market for new entrants. Concern has been expressed from many parties that even the representative rates within the 2012-based projections imply an unsustainable future for many young people, leading to further delay in accessing a home of one's own. If this is embedded within the current round of plan-making, it will simply perpetuate an issue that requires an ambitious response. The 2012-rates are however, preferable to the 2014-based rates.

Backlog in Housing Needs

- 2.27 Although the plan period is to begin in 2016, the assessment period of the SHMAs begins in 2012. The SHMAs therefore provide an assessment of housing need for a 24-year period, including 4 years prior to the plan period. This is useful, as it is well documented in Core Strategy Inspectors' Reports in the West of England that the existing housing requirements for Bristol, South Gloucestershire and North

⁶ Exclusive of the issues raised in bullets 5 and 6 of paragraph 5.38.

Somerset are not based on sound, NPPF-compliant SHMAs. Although one cannot go back very easily to 2006 to objectively assess backlog against what was needed to 2016, it is at least helpful to be able to review delivery against needs since 2012 to establish backlog.

- 2.28 Having regard to the big picture, the latest household projections (unadjusted re migration trends or headship rates), the following performance is revealed.

Housing Delivery for 2012/13 - 2015/17 compared to the 2014-household projections (translated to dwellings).

	2012 (12/13)	2013 (13/14)	2014 (14/15)	2015 (15/16)	2016 (16/17)
2014-based HH Projection*	3,400	5,500	5,100	5,700	5,200
2014-based Dwelling Projection	3,520	5,690	5,280	5,900	5,382
WoE Completions	2,778	3,679	4,019	4,024	5,329
Delivery Gap	742	2,011	1,261	1,876	53
Cumulative Delivery Gap	742	2,753	4,014	5,890	5,943

- 2.29 The household/dwellings projection figures presented in this table are the actual year-by-year increases projected in households/dwellings rather than the average over a longer time period. The table reveals that delivery over the four years prior to 2016 has fallen behind the starting point for OAN by around 5,900 dwellings. This is greater than the combined shortfall that is set out in Figure 1 of the Housing Target Paper of 2,818 dwellings. We assess that the correct shortfall should be captured properly in the OAN.

2.30 With regard to Figure 3 of the Housing Topic Paper, it is evident that for the Wider Bristol HMA the proposed combined market signals uplifts of 10% and 15% to each HMA generate 9,400 dwellings. However, nearly 6,000 of these dwellings are essentially backlog. We are not satisfied that that the residual of the proposed uplifts (3,400) is sufficient to fully address market signals for newly arising need. Moreover, backlog pre-2016 should be dealt with sooner rather than being spread out over the plan period. Potential solutions would be the identification of strategic development locations that are more deliverable in the short term, coupled with the introduction of a greater quantity of supply from non-strategic development locations.

Economic Development

2.31 Paragraph 67 of 'West of England Housing Target (September 2016)' paper, states that '*unless there was a change to the underlying evidence we would caution against a housing target was any higher than the 105,000 dwellings currently proposed*'. Consequently, the availability of new economic development evidence would represent a change that ORS would argue needs to be tested.

2.32 The authorities rely on the 2015 jobs forecasts from Oxford Economics as the basis for the JSP. These update the 2013 forecasts. One would have expected the 2017 forecasts to have been reflected in the update to the SHMAs that was signalled for 2017 by the September 2016 Housing Target Paper. No such update took place and the reason for this needs to be probed.

2.33 Given the 'ambitious' context of the JSP, the authorities planned for the medium-high 2015 Oxford forecast of 82,500 jobs between 2016 and 2036. The more recent 2017 forecasts update the medium high scenario to 108,500 jobs, with the baseline increasing to 70,800 jobs.

2.34 In our assessment, for the authorities to be consistent in their 'ambition', the jobs target should be uplifted to 108,500 jobs, which is closer to, yet still below, job growth for the period 1996-2016. Anything less than this would need the vision to be amended.

Jobs Growth 1996-2016 & recent forecasts

Projection	Jobs
2017 Oxford High	144,500
Past Growth 1996-2016	117,500
2015 Oxford High	115,000
2017 Oxford Med-High	108,500
2015 Experian Baseline	107,000
2015 Cambridge Baseline	100,100
2015 Oxford Med-High	82,500
2017 Oxford Baseline	70,800
2015 Oxford Baseline	49,000

2.36 Based on the current target of 82,500 jobs, the SHMAs are very simplistic in their analysis that sufficient labour will be generated to enable the LEP's vision for the area to be realised. Just as housing of the right type, delivered at the right time and in the right place needs to be pursued, the same principle should be applied to labour. The SHMA analysis is not refined enough from an economic development perspective. The issue is more complex than simply matching the number of economically active working age people to the number of projected jobs.

2.37 ORS has failed to take account of this. It has only considered the level of population and housing growth that would be needed to sustain the additional jobs that are expected to be created over the JSP period. It underestimates the population and the number of new homes that would be required to align with the expected total level of future employment within the JSP area.

2.38 For example, if one examines Figure 16 of the BANES SHMA, one finds the following in relation to economically active people generated by the demographic projections 2016-36.

- A gain of 4,600 economically active people;
- A gain of 4,975 economically active people over 60, of which 3,422 people are over 65, 1,300 people are over 70 and 700 people are over 75 (many of which are likely to be taking up part time roles in only certain sectors);
- A loss of 2,375 economically active people between the ages of 30-59;
- A gain of 1,487 economically active people aged 16-24 (including many school children and students in education); and
- A gain of 714 economically active people aged 25-29.

2.39 There is no assessment of how these future changes to the nature of the economically active population (including the current level of planned housing boost) squares with the sectoral growth ambitions of the LEP's Strategic Economic Plan. Further, there is no population projection by age band to reflect the 105,500 houses that are planned in the JSP (to account for the population uplift from a boost to demographic based housing needs). However, we understand that this would follow the pattern in paragraph 2.36 above, in BANES at least.

2.40 The sub-region must attract more workers aged 25-59, if it is to meet the LEP's sectoral targets and become "one of Europe's fastest growing and most prosperous sub-regions". Therefore, we see a mismatch between the LEP's future economic programme and the workforce. This can only be corrected by boosting housing that is attractive to 25-59 year olds, probably with families.

Market Signals

2.41 Currently the Housing Target Paper includes a 10% market signals uplift for Bristol and 15% uplift for Bath against the household projection in Figure 3 of 88,400 to reach an OAN of 97,400 (less the elderly persons housing component of 4,400).

- 2.42 In comparison, there is evidence that an overall uplift of 27% is needed to more fully take account of market signals following the standard methodology and the control figure of 266,000 for England. This would increase the OAN by 18,600 to 116,000 (less the elderly persons housing component).
- 2.43 If the Government's ambition of 300,000 homes per year is to be delivered then the implication for the West of England would be a housing figure of over 120,000 (less the elderly persons housing component).
- 2.44 ORS's view (BANES SHMA, 4.3-4.18) is that the demographic case for an uplift over the national household projections of 211,200 takes the housing requirement to 253,000. That is a 20% uplift. This uplift included only a 2% market signal response related to concealed households. Much of the uplift is made by demographic analysis alone.
- 2.45 If one applies a 20% uplift to the West of England 2014-based household projection one arrives at a figure of 105,840 (less the elderly persons housing component of 4,400). It seems to us inconsistent for the West of England market signals response to be 10.6% in the context of a 20% uplift being set out for England on account of demographics alone.
- 2.46 It is evident that the market signals response that has been suggested is based purely on comparative benchmarking and is an under-estimation of the need that will arise.
- 2.47 The West of England has greater housing pressures than nationally and is host to a fast-growing city. Annex 2 of 'The Formulation of the Emerging Spatial Strategy' notes that the national housing crisis is a particular problem in the West of England.
- 2.48 Therefore, the uplift that is justified to match the ambition of the devolution deal would generate a figure of 116,000 to 120,000+ (less the elderly persons housing component of 4,400). Once added the housing requirement would increase to around 120,000-124,000.
- 2.49 Finally, even if the proposed CLG methodology driving a figure of 116,000 is not automatically applicable, the 'Right Homes, Right Places' consultation document states that authorities should rely on the existing PPG and NPPF which require that full account should be taken of market signals. Therefore, whether or not an emerging standard methodology is in place, if there is evidence that justifies a

higher level of need, trickling down from the national to the local scale, then market signals adjustment beyond current benchmarking practice is justifiable. Conversely, taking a narrow view and ignoring the wider evidence in favour of basing the response in the West of England to responses that have been agreed elsewhere is not sound.

- 2.50 We comment on whether the housing requirement should be uplifted further, based on delivering more of the affordable housing need, in our response to Policy 3 of the JSP.
- 2.51 In addition, the 2017-based Oxford Economics Medium-High jobs projection of 108,000 needs to be addressed by the SHMA authors and this would seem to justify a significantly higher OAN of up to 140,000 homes.

Vacancy/Second Homes

- 2.52 A very basic error in the Housing Target Paper is that Figure 3 does not make an adjustment of 3.5% to convert the projection of 88,400 households to a dwellings figure. There is no allowance for transactional vacancies and second homes as applied in Figure 1 of the Target Paper. There is no explanation of why this allowance has been dropped.
- 2.53 A 3.5% allowance would convert the household projection to a dwellings projection of 91,494. If the current market signals uplift of 10.6% is applied it generates a figure of 101,192 dwellings as the basic OAN. This is 3,592 more than presented within Figure 3. The subsequent addition of the 'older people moving into care' component of need of 4,400 results in a housing requirement of 105,792 dwellings not 102,200 dwellings.
- 2.54 On this basis (and putting aside other matters raised in this section) the housing requirement is therefore 3,600 dwellings more than stated in the Housing Target Paper and the JSP. Whilst the total supply in the JSP is 105,500 dwellings, the authorities expressly argue that the difference between this and 102,200 dwellings (3,300) is necessary flexibility. This is 3.22% of the housing requirement. Consequently, the logic is that this flexibility forms part of the baseline requirement and that there is no flexibility for the uplifted requirement. In our assessment, the authorities need to find 3,300 to 3,400 additional dwellings supply to restore that flexibility. Whilst we do not accept that 3.22%

flexibility is sound (it should be at least 5% i.e. one year of supply) we focus on the Councils' position in the following paragraphs.

- 2.55 We assume that the authorities would argue that the contingency supply identified in Policy 1 and Policy 2 of the JSP amounts to 3,100 dwellings in the plan period and a further 725 dwellings post 2026. The contingency supply includes two Green Belt locations at Clevedon and Chipping Sodbury, for which there is little or no evidence or justification. If these locations are identified as part of the flexibility component, there would be no contingency supply, for which the authorities argue there is a need.
- 2.56 We support the concept of contingency, but contest the strategic locations that have been presented in our comments on Policy 2 of the JSP. It follows that we contest the automatic translation of this contingency supply into the 'flexibility' component of the JSP. In any event, to correct the error in figure 3 of the Topic Paper and to follow this through to its logical conclusion, there is a need for a replacement contingency of around 3,500 dwellings.

5-Year Housing Land Supply

- 2.57 Policy 1 states that the 5-year Housing Land Supply assessment will be based on the Housing Requirement of 102,200 and will be set out in the UAs' Local Plans. We would argue that the 5-year supply starting point should in fact be 108,800 dwellings if no other changes to the OAN are made.
- 2.58 We are concerned that no overall housing trajectory is put forward as part of the JSP consultation, which gives the Inspector no indication of whether the Plan is able to create the framework for 5-year supply obligations to be met.
- 2.59 Finally, we question the complete internalisation of 5-year supply considerations within each authority. Part of the reason for the JSP is to enable unmet needs in Bristol to be planned for. However, if Bristol defaults in respect of 5-year supply, then the only recourse to corrective action for Bristol will be plan review. This is a cumbersome approach. We believe that if Bristol defaults in respect of 5-year supply that corrective action should be permitted in the surrounding authorities. If the JSP were to be adopted in its current form, only (less sustainable) non-Green Belt sites could form part of the corrective response. Green Belt boundary changes should endure beyond one plan period in accordance with paragraph 85 of the NPPF.

3. POLICY 2: THE SPATIAL STRATEGY

- 3.1 The JSP is conservative in its ambition in respect of the housing requirement, yet high risk in respect of the deliverability of the spatial strategy. Within the Publication JSP, it is necessary to consider the net effect of proposed additional growth against baseline committed growth to show the comprehensive spatial framework for the full plan period. This will also reveal any issues in relation to the interplay between current and proposed locations in relation to deliverability, infrastructure and phasing⁷.
- 3.2 A number of strategic development locations (i.e. sites or clusters of sites of over 500 dwellings) that are already allocated in existing Core Strategies have yet to begin, or have a long way to go before being fully complete. This includes Weston Villages, Patchway, Cribbs Causeway, Harry Stoke, Emerson's Green and the later phases of Bath Western Riverside. These are as much a part of the spatial strategy for the period 2016-2036 as newly identified location. Consequently, these should be specifically referred to in the JSP and identified on the Key diagram.
- 3.3 Without such an approach, there will be no single document within the West of England showing what the whole spatial strategy actually is. It should not be necessary to have to piece together all four Local Plan reviews to be able to view the whole spatial strategy but that is what the JSP currently requires.
- 3.4 It is critically important for the examining Inspector and users of the JSP to be given ease of reference to the bigger picture – not least because Policy 6 of the JSP states, in relation to strategic transport infrastructure, that priority will be given to schemes that support the delivery of the spatial strategy as set out in Policy 2.

The Delivery of Existing Local Plan Commitments

- 3.5 The delivery of existing Local Plan commitments of 61,500 homes should be a fairly robust assumption and, even if commitments are not built out by current plan end dates of 2026, 2027 and 2029, they should be completed by 2036. We

⁷ For example, notwithstanding the issues that we set out in relation to the M5/A38 (Banwell/Churchill) location – to what extent can the Weston sub-market twin track delivery at this location within Weston Villages, or must one follow the other to avoid sites competing with themselves.

do, however, have some concerns in respect of the Sydenham Park area of Bath, which would reduce overall commitments by around 500 for the JSP and specifically for supply within BANES.

Urban Living

- 3.6 Of the 44,000 additional homes to be planned for beyond current Core Strategy commitments, 16,200 homes (36%) are to be secured on newly identified large brownfield sites, or sites that are already relied upon but with an emphasis on achieving higher densities, or as the Plan puts it “Optimising densities”.
- 3.7 To justify this source of supply, to the extent set out, requires the presentation of information in a Housing and Economic Land Availability Assessment (HEELA), so that assumptions may be investigated. The need for a HEELA is not disengaged because a joint strategic plan is being prepared rather than a Local Plan. The presentation of the required information cannot be deferred to the Local Plan review of each LPA.
- 3.8 Moreover, a HEELA should have been published as part of the Regulation 19 consultation, not just for brownfield supply, but also for greenfield supply. In respect of the later, the authorities have published a series of assessments for the chosen strategic development locations. However, there is nothing in respect of the proposed strategic contingency sites to the south of Chipping Sodbury or at Clevedon, and nothing on non-strategic sites.
- 3.9 Although the plan does not seek to allocate non-strategic sites, plan-makers still need to demonstrate a full understanding of the non-strategic greenfield supply that is available, suitable, and achievable on land outside the Green Belt in order to justify that the proposed level of Green Belt release in the Plan is sound.
- 3.10 For Urban Living and other sources of supply, a set of standard outputs should be produced from the assessment to ensure consistency, accessibility and transparency. Without such information neither consultees, nor the Inspector, can determine whether the extent of exceptional circumstances for removing land from the Green Belt is correctly defined. In our view, a HEELA should have been published as part of the Regulation 19 submission documentation as a core supporting document. This should have included:
- a list of all sites or broad locations considered, cross-referenced to their locations on maps;

- an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable to determine whether a site is realistically expected to be developed and when;
- more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
- the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build-out rates, setting out how any barriers to delivery could be overcome and when; and
- an indicative development trajectory and consideration of associated risks.

3.11 An Urban Living Topic Paper was published alongside the Regulation 18 JSP in November 2016. At this time, we advised in our representations that this was far from PPG-compliant. Despite the presentation of a methodology, the supply was presented in terms of a very broad typology of sites, but this is not what is required by the PPG. We requested greater geographic specificity to enable consultees and an examining Inspector to fully understand the assumptions, as there was scant information to justify the claimed outputs. Nothing has been forthcoming in respect of the Publication JSP.

Urban Living - Regulation 18 and Regulation 19 Figures

Source	Regulation 18 JSP	Regulation 19 JSP	Difference
Bristol	12,000	12,000	0
Bath	300	300	0
North & East Fringe & Yate	1,300	2,900	+1,600
Weston super Mare	1,000	1,000	0
Total	14,600	16,200	+1,600

Bristol

3.12 Bristol City Council’s administrative area is by far the greatest source of assumed supply, offering 12,000 units.

3.13 The figures for Bristol presented at Regulation 18 and Regulation 19 stage are as follows:

Typology	Supply
City reclaimed land	6,800
Surplus industrial/warehousing land	1,500
Re-use/redevelopment of redundant city centre offices	2,100
Uplift of existing local plan site allocations	500
Undeveloped urban land	1,100
Total	12,000

3.14 For *City reclaimed land*, no evidence is presented to justify this figure. If it is to be relied upon, the examining Inspector will require a detailed HEELA set of outputs and consultees will need to be offered the opportunity of commenting. It would appear that none of the urban living supply in Bristol was developable to 2026, otherwise it would have been promoted in the Bristol Site Allocations Plan (July 2014). It may be that the 6,500 units identified at Regulation 18 stage are all assumed to be ‘post 2026’. The assumed supply will need to be shown in a housing trajectory that is site or locationally specific.

3.15 Surplus industrial/warehousing land relates to the Principal Industrial and Warehousing Areas (PIWAs). These were adopted in 2014, and now three years later the Council has decided that it ‘over-protected’ this land. However, it will not say which sites or which units within sites. As is the case for city reclaimed land there are insufficient HEELA outputs for this typology/source of supply.

- 3.16 City Centre office space supply also falls short of PPG guidance in relation to the robustness of the evidence that is presented. A transparent assessment of the sites in question is required and why they are not needed, or are unable to contribute to long term jobs targets.
- 3.17 The estimated capacity of existing Local Plan site allocations was found to be sound in 2014. The Council does not need to review the sites in question to permit high levels of development. However, a JSP Inspector will need to be presented with the sites that are to be affected to determine whether a cumulative uplift of 500+ is reasonable or would cause harm that would outweigh the benefits. Again, the JSP needs a transparent HEELA to show which sites would benefit from this uplift.
- 3.18 Undeveloped urban land will be a precious resource as the city intensifies within its administrative boundaries. We do not see how a JSP Inspector can endorse a contribution for this source against the background of the adopted Development Plan – which promotes the retention of this land as ‘open land’. Unless the 12,000 supply is tested in the JSP examination to the extent that it would be in Local Plan examination, any conclusions reached by the JSP Inspector will have to be heavily caveated. The starting point is the identification of this supply within a PPG-compliant HELAA. This has not yet been achieved. We do not think that this level of assessment can be deferred to the Bristol Local Plan review, as if there is a finding that the figure is not reliable. This is because there is no joint planning mechanism to deal with the implications (after the JSP has been adopted).

Bath

- 3.19 It is highly likely that of the 6,600 dwellings planned for Bath over the Core Strategy plan period to 2029, less than 6,000 will be forthcoming by this date. This does not matter from a long-term JSP perspective, so long as the residual supply comes forward by 2036. However, we have concerns that some elements (e.g. the Sydenham Park area, identified for 500 dwellings in the BANES Placemaking Plan) will be unable to be relied upon at the time of the JSP examination due to its continuing use for retail. We do not consider that this site can be relied upon as being developable in the JSP period. It should be deleted from the committed supply assumptions.

- 3.20 500 units should be added to the housing requirement for BANES, meaning, other things being equal, an uplift from 700 units to 1,200 dwellings in respect of non-strategic supply, or expansion of the Brislington SDL into land at Hicks Gate in BANES.

North & East Fringe & Yate

- 3.21 Potential supply in this area has increased from 1,300 units to 2,900 units. The original figure was poorly evidenced with the uplifted figure even less so. Given the absence of any evidence, it is not possible for consultees or the Inspector to be sure of the robustness of the urban living assumption for South Gloucestershire. Further evidence will need to be presented as part of the examination.

Non-strategic Growth

- 3.22 The Regulation 18 version of the JSP identified a 'budget' for 3,400 dwellings from sites of less than 500 units, 400 for Bristol and up to 1,000 dwellings in each of the other authorities. The 400 units for Bristol must relate to a limited number of sites that have already been identified with the alignment of the new South Bristol Ring Road. However, it is not clear whether the units proposed for the other authorities present the maximum that could be achieved.
- 3.23 We believe that the Inspector needs to know how much sustainable development potential exists on non-Green Belt, non-strategic sites in order to be confident of the level of exceptional circumstances that exist within the West of England. That information is not available as part of the JSP evidence base unless the Councils are claiming that the non-strategic targets in the JSP are representative of the maximum level of non-green belt supply that has been identified (which they are not), then there is a gap in the evidence base. The authorities do not propose to explore this issue until Local Plan review. However, in our assessment the information is needed now within a comprehensive HEELA for the West of England area.
- 3.24 Even without an uplift to the housing requirement we consider that the deliverability of the proposed housing requirement, both long term and in respect of the maintenance of a 5-year land supply, would be improved substantially if a greater quantum of non-strategic growth formed part of the spatial strategy.

3.25 In any case, as the housing requirement in Policy 1, is too low. An increase in land supply is required from both strategic and non-strategic sources.

Strategic Development Locations

3.26 To avoid duplication, we reserve most of our representations on the strategic development locations to Policy 7, but wish to have those comments taken into consideration in respect of Policy 2.

3.27 In the introduction to our representations on Policy 2, we stated that the JSP is conservative in its ambition in respect of the housing requirement, yet high risk in respect of the deliverability credentials of the spatial strategy.

3.28 Even if the housing requirement were judged to be sound we have serious concerns in respect of the deliverability of the JSP as whole, because of the Strategic Development Locations that have been selected.

3.29 We also struggle to see a consistent approach to the selection of Strategic Development Locations. South Gloucestershire and BANES have recognised that Green Belt locations will be needed as part of the spatial strategy, but North Somerset seeks to avoid any development in the Green Belt.

Review

3.30 We are pleased to see a commitment to review the JSP at 5 year intervals from adoption. However, the supporting text does not explain that the first review of the Plan will comprise one plan for the Mayoral Combined Authority (MCA) and one plan for North Somerset, given that it is outside the Mayoral Authority Area. We are also concerned that if the JSP is adopted without a substantial upward movement in the housing requirement that an inevitable backlog of housing need will have built up since 2016 (based on the difference between the standard methodology and the current plan requirement). It will be difficult to recover from this in a timely fashion.

3.31 It seems likely that the review of the JSP will have to be prepared as two separate plans rather than one as the MCA will have a duty to deliver a Mayoral Spatial Strategy covering the MCA area and North Somerset cannot be part of that plan. This does not preclude joint working but it adds a layer of complication to the process. It also adds weight to the argument that, in the absence of a fully

sound plan, recourse to a short-term plan review should be avoided in favour of a modified JSP with a robust, long-term development programme.

- 3.32 Many of the most significant infrastructure requirements in the JSP relate to North Somerset (e.g. a new Junction 21A and a new M5-A38 Link and the Nailsea Corridor Improvement from Clevedon and the M5 to the A370, the A38 and Bristol. What are the prospects for this investment given that the MCA excludes North Somerset? Does the devolved funding of £900m that is available over 30 years relate only to land within or immediately adjoining the MCA authorities? Will the MCA determine priorities for transport investment and therefore the deliverability of the JSP?

4. POLICY 3: THE AFFORDABLE HOUSING TARGET

- 4.1 In the context of an overall OAN of 102,200 dwellings (5,110 per annum), the SHMA identifies a need for 32,200 affordable dwellings (1,610 per annum), which is 31.5% of the total OAN. Of the affordable homes needed, 29,100 dwellings are required in the Wider Bristol HMA and 3,100 in the BANES HMA.
- 4.2 Against this need, the proposed affordable housing supply target for the JSP area is 24,500 dwellings (1,225 per annum), which is 76% of the total need. This is linked to the proposed overall supply of 105,500 rather than the overall OAN of 102,200.
- 4.3 Diagram 5 of Topic Paper 1 breaks down the need by LPA, and this data is reproduced in the table below.

LPA	Affordable Need 2016-2036	JSP Policy 3 Target
BANES	3,100 (155pa)	Not identified
Bristol	18,800 (940pa)	Not identified
North Somerset	4,800 (240pa)	Not identified
South Gloucestershire	5,500 (275pa)	Not identified
West of England	32,000 (1,610pa)	24,500 (1,225pa)*

*It is assumed that this figure does not include an element of 'starter homes' as these are not 'affordable homes'.

- 4.4 One of the failures of the Publication JSP is that it does not aim to meet all of the identified need for affordable housing. The LPAs have considered a further boost in overall supply but have determined that it is not appropriate. No explicit reason is given for this, but it will relate to the balance of jobs growth/workers and new homes that they wish to plan for, which we have shown is based on conservative assumptions about employment growth.

- 4.5 It is interesting to note that the Councils have published an understanding of the affordable housing OAN within their specific areas, but have not published data for the market housing OAN, or the overall OAN. This must surely be available and is material to an assessment of the appropriateness of the spatial strategy. As set out in our representations on Policy 1, this should be rectified.
- 4.6 Of the proposed affordable housing target, Topic Paper 1 (paragraph 3.10a) states that 13,000 affordable dwellings are already committed within the base overall housing supply of 61,500. The value-added effect of the JSP is therefore to enable the delivery of another 11,500 affordable dwellings.
- 4.7 No information is provided in the evidence base to set out how the overall target and the 'valued added' target have been arrived at, and the sources of supply that are to be relied upon. This is because there is not a comprehensive housing trajectory for the plan period. This should be rectified.
- 4.8 Moreover, the overall affordable housing target of Policy 3 should be broken down by LPA. These figures must be available for the overall target to be arrived at. It is particularly important for the evidence base to enable an interrogation of the 11,500 dwellings that the JSP itself will enable, and the breakdown between supply components of SDL's, 'urban living', non-strategic growth, and windfall. Without this information, the Inspector cannot be sure that the proposed target can be achieved from the proposed sources of supply.
- 4.9 On the current evidence, given the mismatch between the need for affordable housing and the assumed supply of affordable housing, 7,500 households in need (750 per annum) won't be able to form, or will leave the area to form, or will form, but live in shared dwellings.
- 4.10 We are not satisfied that the Plan is justified in not fully meeting this need, or not meeting more of it, given that additional sources of housing land are available and deliverable and that development of these locations would be consistent with paragraph 14 of the NPPF. Exceptional circumstances are already 'in play' and there are Green Belt locations that could be developed that would not conflict with the 5 purposes of Green Belt. To fully address the identified OAN for affordable housing would require the identification of around 21,000 more units on large sites and the achievement of 35% affordable housing provision. This would take the total housing requirement to around 126,500 homes. Giving that a contingency 'float' of 3,000 homes is identified in Policy 2, the uplift needed to

fully bridge the gap would be 18,000 homes. We consider that a significant movement could be made by plan-makers to bridge much or indeed all of this gap.

- 4.11 Having regard to the potential strategic development locations that have been rejected, there is certainly scope for the non-strategic component of land supply to increase in some authorities. It is considered that a full and meaningful movement can be made towards bridging the gap between need and supply. This resultant outcome would be more in tune with the 'ambition' of the West of England Devolution Deal.

5. POLICY 4: THE EMPLOYMENT LAND REQUIREMENT

- 5.1 The authorities rely on the 2015 jobs forecasts from Oxford Economics as the basis for the JSP. These update the 2013 forecasts. We would have expected the 2017 forecasts to have been reflected in the update to the SHMAs that was signalled for 2017 within the September 2016 Housing Target Paper. No such update took place and the reason for this omission needs to be probed.
- 5.2 Given the 'ambitious' context of the JSP the authorities planned for the medium-high 2015 Oxford Economics forecast of 82,500 jobs between 2016 and 2036. The more recent 2017 forecasts update the medium-high scenario to 108,500 jobs, with the baseline increasing to 70,800 jobs.
- 5.3 In our assessment, for the authorities to be consistent in their 'ambition' the jobs target should be uplifted to 108,500 jobs, which is closer to, yet still below, job growth for the period 1996-2016. Anything less than this would need the vision to be amended.

Jobs Growth 1996-2016 & recent forecasts

Projection	Jobs
2017 Oxford High	144,500
Past Growth 1996-2016	117,500
2015 Oxford High	115,000
2017 Oxford Med-High	108,500
2015 Experian Baseline	107,000
2015 Cambridge Baseline	100,100
2015 Oxford Med-High	82,500
2017 Oxford Baseline	70,800
2015 Oxford Baseline	49,000

6. POLICY 6: STRATEGIC INFRASTRUCTURE REQUIREMENTS

- 6.1 Policy 6 covers both transport infrastructure and other strategic infrastructure. Significant levels of infrastructure are needed to enable the delivery of the proposed Strategic Development Locations (SDLs). The level of infrastructure needed in transport terms is very significant indeed, as is acknowledged in the Publication JSP itself. However, one has to turn to the Joint Transport Study to understand those costings
- 6.2 We have serious doubts about whether the level of investment that is required to make some of the SDLs deliverable and sustainable is going to be available to deliver the spatial strategy and required housing supply trajectory. Locations generating fewer or cheaper infrastructure interventions; or locations that can make the most of recent projects; or SDLs near to Bristol should be substituted for the high risk, less sustainable SDL's.
- 6.3 To avoid duplication, we present the details of our case in the context of Policy 7 (Strategic Development Locations), but subject to how the Inspector wishes to organise the examination hearings, we request that our comments on Policy 7 and 7.1-7.12 referred to in relation to Policy 6.
- 6.4 We note that paragraph 1.21 of the Procedural Practice in the Examination of Local Plans 1.1 states that:
- "LPAs should rigorously assess the plan before it is published for consultation under regulation 19 to ensure that it is a plan which they think is sound. The plan should focus relentlessly on the critical issues and the strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the plan is to address the critical issues as far as possible."*
- 6.5 As will be evident from our critique of the Plan, policy planners in the West of England have not joined the dots together in respect of deliverability. We think that this is a timing issue and that whilst the Joint Transport Study provides the evidence of what is needed and the costs, this information has not been available to policy planners soon enough or they have not had proper regard to it.

7. POLICY 7: STRATEGIC DEVELOPMENT LOCATIONS

- 7.1 One of our fundamental concerns in respect of the justification for and effectiveness of the JSP is that the transport infrastructure projects that are needed to deliver both committed growth and the selected SDL's are not achievable during the plan period.
- 7.2 To aid presentation of the representations for Policy 7, Appendix 1 presents a comparative table showing the assumed capacity and deliverability of the proposed SDLs as of December 2016, compared to December 2017. In addition, Appendix 2 presents a combined housing trajectory for the proposed strategic development locations.

APPENDIX 1: COMPARATIVE TABLE FOR STRATEGIC DEVELOPMENT LOCATIONS

APPENDIX 2: COMBINED HOUSING TRAJECTORY FOR STRATEGIC DEVELOPMENT LOCATIONS

- 7.3 To fully understand the monetary investment that is required one has to look to the Joint Transport Study. Policies 7.1-7.12 of the JSP only present the projects that are needed for the SDLs, but not all the projects that will be needed to bring forward the housing requirement as a whole, and their costs. When looking at the combined housing trajectories of each SDL, together with the committed growth in adopted Core Strategies, it is evident that a step change in funding is required across the plan period as whole and that much of the finance will be required in the early years of the plan.
- 7.4 Table 13-1 of The Joint Transport Study (Estimated costs of schemes in the Transport Vision) is a useful reference point from which to comprehend the scale of the investment that is required. We think that this Table is so important to the soundness of the JSP that it should be included within the supporting text to Policy 6.

APPENDIX 3: ESTIMATED COSTS OF SCHEMES IN THE TRANSPORT VISION

- 7.5 Table 31-1 of the JTS identifies a transport infrastructure vision of *£6.115bn - £8,835bn* at 2016 prices or *£8,905bn - £12,995bn* at estimated future outturn costs.

- 7.6 At present, the West of England is investing around £100m per annum on capital schemes, including Metrobus. As a minimum, based on 2016 prices, expenditure needs to increase to £300m per annum over 20 years, (or at outturn prices to £450m). Investment would need to be as high as £450m-£600m at the upper end of the range. All this assumes a 20-year average, but the reality is that to deliver the JSP a more concentrated level of spending would be needed in the early years.
- 7.7 In December 2016, the Transport Topic Paper on the accompanying the Regulation 18 JSP, Table 5-1 set out (in the context of overall assumed cost for the Transport Visions at the time, which have subsequently increased) data on the mitigation costs specifically attributable to the additional growth planned in the JSP (as presented at that time). The cost was estimated to be £1.8bn. The October 2017 JTS does not present a comparable figure and this is an omission from the evidence base.
- 7.8 However, Table 13-1 presents a breakdown of total costs. A number of these stand out: notably the £440m required for a new Junction 21A on the M5 in association with a Banwell, Churchill and Sandford bypass and £380m for the Nailsea Corridor. We make these observations as they are symptomatic of the points we make in the section about the deliverability of the spatial strategy as a whole, not least in respect of North Somerset and the testing of alternatives. These two projects at account for £820m of the £1.8bn assumed mitigation costs. There are alternative locations in the West of England where more housing can be delivered more cheaply from current or proposed infrastructure projects.
- 7.9 The Key Diagram, Policy 6, Policy 7 and Policies 7.1-7.10 show projects that are needed to make the plan sustainable and mitigate the transport effects of development so that they are acceptable. If all the measures are implemented the JTS estimates the following shift in travel patterns.

Current and forecast Modal Share as a result of the implementation of the JTS

	2011		2036	
	Number	%	Number	%
Working mainly at home	26450	5%	47110	7%
Walking & cycling	100510	19%	168250	25%
Public Transport	47610	9%	114410	17%
Taxi / motorbike	10580	2%	13460	2%
Car /van driver	312110	59%	302850	45%
Car/van passenger	26450	5%	26920	4%
Total	529000	529,000	673,000	673,000

7.10 As can be seen, a key objective of the Vision is to ensure that car/van driver based trips do not increase over the plan period. If no action is taken, the transport modelling indicates a 26% forecast increase in trips on the road network between 2013 and 2036. This is estimated to result in an increase in average delay per vehicle of almost 40%. Traffic delays will increase much more significantly at major hotspots, including Bristol City Centre, Bath, Weston-super-Mare, the North and East Fringes and South Bristol. Such delays would act as a significant barrier to growth in these areas.

7.11 With the Transport Vision in place, the JTS states that it will be possible to significantly reduce traffic delays, but the impact will be dependent on several factors. It will require high levels of modal shift in the urban areas, enabling reductions in flow on the urban network. It will also require significant improvements to the road network, to re-route orbital traffic out of the road network in South Bristol, enhance connectivity to the East Fringe from the M4 and

improve connections between North Somerset and Bristol. It will also require careful consideration of options for the future management of road space in the urban areas.

7.12 Critically the Joint Transport Study states that:

"This Transport Vision is intentionally ambitious. It will require an unprecedented level of funding, with a large acceleration of spending from current levels."

7.13 This is perhaps the single most important statement affecting the JSP and decisions about the spatial strategy, and demonstrates the need to develop a spatial strategy that is as efficient as possible in respect of the need for additional highways infrastructure. We do not see such an approach in Policy 2 or Policy 7.

7.14 The Spatial Strategy appears to have been developed without an understanding of its viability and deliverability. The Joint Transport Study has then tested this spatial strategy and has come up with a 'cost', but there has been no iteration for planning policy teams to subsequently check viability/deliverability as the process appears to have been driven by the need to submit the JSP by March 2018.

7.15 Another way of devising (and sensitivity testing) the Spatial Strategy would have been to assume a series of 3-5 year budgets for transport projects and then have to have developed a phased Spatial Strategy that delivered the required housing in the most sustainable way possible, having regard to the budget. If the budget is lower than required (as is clearly the case currently) the spatial strategy should select locations that (1) reduce costs and (2) generate fewer additional car movements.

7.16 Against this background we consider that some of the SDLs have merit and should be identified in the Plan, but others (and the contingency SDLs) are either not sound in themselves, compared with rejected alternatives, or as a package.

7.17 We consider that the Strategic Development Locations as a package are not deliverable by 2036. Unprecedented levels of investment finance would need to be secured, third-party land secured, and construction completed to enable the combined development trajectory to be achieved.

- 7.18 In this context, notwithstanding the unsoundness of the housing requirement and the lack of evidence in respect of brownfield supply, the solution is delete some of the strategic locations and replace them with other, more deliverable and sustainable locations. The obvious implication of this approach is that there are exceptional circumstances to justify a greater degree of Green Belt release. This does not mean shutting down growth outside the Green Belt, but it does mean removing the largest and weakest-performing non-Green Belt SDLs from the plan (Banwell, Churchill and Buckover).
- 7.19 Whilst it is essential to consider whether there are exceptional circumstances to identify strategic locations in the Green Belt, our position is that the first question must be whether some of the non-Green Belt SDL's are in sustainable locations, or in locations that can be made sustainable to support the intended level of housing development. Our view is that some of the locations are not sustainable, and cannot be made sustainable, for the level of development proposed.
- 7.20 The JTS states that the components of the Transport Vision will require significant further work to develop business cases and, if they have a clear case, further consultation and statutory planning processes. Evidently, there are significant unknowns and even if there is a business case for each component of the Vision it does not mean that the funding for each component will be available. Priorities will need to be identified and this will affect the spatial strategy and the housing trajectory.
- 7.21 The JTS also notes that there are significant engineering challenges in building the proposed highway schemes. The JTS concludes by saying that whilst there is a transport case for considering the proposals, further work will be required to establish detailed forecasts of demand, benefits, costs, business case and sources of funding. The delivery of schemes will be subject to the availability of funding and, in most cases, completion of statutory processes.
- 7.22 Consequently, the JTS only presents a transport case for the schemes presented. The JTS is neither a feasibility assessment nor a business case. Consequently, the JSP is not built on sound foundations in transport terms.

8. POLICY 7.1: NORTH KEYNSHAM & POLICY 7.2: WHITCHURCH (BANES)

8.1 North Keynsham and Whitchurch comprise the two strategic development locations that are proposed in BANES.

8.2 Both locations are within the Bristol Housing Market Area. No strategic locations are proposed in the Bath Housing Market Area. Whitchurch especially, has greater functional linkages with Bristol than Bath, although travel-to-work movements originating in Keynsham do have destinations both eastward and westwards. Whitchurch is effectively meeting housing needs originating within Bristol. Due to the bias towards the Bristol HMA, non-strategic growth in BANES should perhaps be directed to areas that will better support the Bath HMA. This includes Keynsham, Saltford and development in the Somer Valley and its environs.

8.3 The capacity and delivery assumptions for each of BANES SDL’s are presented below.

	Regulation 18 JSP		Publication JSP	
	Capacity	to 2036	Capacity	to 2036
North Keynsham	1,100	1,100	1,500	1,400
Whitchurch	3,500	3,500	2,500	1,600
Total	4,600	4,600	4,000	3,000

8.4 North Keynsham is scheduled to deliver housing from 2027/28, which means commencement in 2026/27 and Whitchurch is scheduled to deliver from 2029/30, with commencement in 2028/29.

8.5 This back-end loaded trajectory reflects the policy requirements that stipulate that no housing is to be completed at the Keynsham SDL ahead of

- The Avon Mill Lane to A4 link (£55m for 1.6km of single carriage way and a rail bridge);
- Keynsham rail station improvements (cost to be confirmed); and
- A Metrobus route from Bristol to Keynsham on the A4 corridor being completed (part of £140m cost for 14km of major and minor works between Bristol to Bath).

- 8.6 At Whitchurch, no dwellings are to be completed ahead of
- a Park & Ride within the strategic location (c£25m); and
 - the completion a of multi-modal link A4-A37-south Bristol link, (£185m for a new 8km corridor and £130m for an orbital MetroBus route between Whitchurch and Emerson's Green), including as a pre-requisite;
 - the Callington Road scheme being completed (£45m for 1.8km single carriageway).
- 8.7 Both the SDLs in BANES, and therefore the SDL strategy for BANES, can be said to be in high risk in terms of deliverability. In respect of North Keynsham (the SDL programmed for earliest delivery in BANES), the JSP will not be adopted until 2019/20 at best, with the land not removed from the Green Belt in the BANES Local Plan Review until 2020/21 at best.
- 8.8 All the transport infrastructure needed to enable delivery at North Keynsham needs to secure its funding, control the land, and achieve agreement with Network Rail and be completed in 6-7 years after adoption of the JSP. This means that North Keynsham is going to be competing against the need to deliver committed growth and the other SDLs across the West of England, including Whitchurch. Many housing projects will be trying to secure funding in the same period. Whitchurch, which has even higher infrastructure costs than Keynsham is scheduled to commence just a couple of years after North Keynsham and this is likely to be targeting the same funding cycles.
- 8.9 Notwithstanding the headline issues raised above, the assumed deliverability of Whitchurch has rightly been reduced from 3,500 dwellings to just 1,600 dwellings to 2036. Indeed, the total capacity has been reduced from 3,500 dwellings to 2,500 dwellings, yet this still requires three years of output at 300 units per annum (in the last three year of the plan period). Even if the start date were said to be realistic, we suggest that no SDL should be assumed to peak at more than 250 dwellings an annum for at most 3 consecutive years of its development programme. Whitchurch could easily slip. If it slips by three years then 900 dwellings disappear from the plan period.
- 8.10 The 100 dwellings 'contingency for BANES' identified in Policy 2 of the JSP is therefore somewhat underwhelming.

- 8.11 The Inspector will be aware of industry evidence on the average rate of development achieved on strategic sites in England. One of the more recent studies from NLP '*Start to finish: how quickly do large scale housing sites deliver*' (November 2016) is empirical research showing that the average build out rate for schemes of 2,000+ dwellings is 161 per annum. We suggest that it is incumbent on the authorities on the West of England to provide evidence of the peaks, troughs and averages in build out rates that have been seen on strategic greenfield sites in the plan area and in neighbouring areas to justify current assumptions.
- 8.12 In addition to Whitchurch particular attention needs to be given to the housing trajectories for Nailsea and Churchill Garden Villages; SDL's where 300 completions per annum are anticipated over 7 and 8 years respectively.
- 8.13 The key point is that the infrastructure costs for each SDL form part of a 'critical' package of transport measures that are needed to enable all committed growth and all the new SDLs across the West of England. This package is vast, and to enable all the trajectories for all the SDL's, the funding needs to be secured in quite a compressed period post adoption of the JSP. Seen in this light the Spatial Strategy looks to be on the wrong side of the 'ambitious but realistic' equation of paragraph 154 in the NPPF by some margin.
- 8.14 In respect of the precise wording of Policy 7.1 on North Keynsham, bullet 5 seeks to enable a mixed-tenure marina providing both residential and leisure moorings. It is not clear if any permanent residential moorings are to form part of the 1,500 homes proposed⁸. If this is the intention there is no guidance on the upper limit of residential moorings that can contribute to the homes target (is it 25, 50, 100 or 150?). There is no evidence to justify what the upper limit for contributions, if any, should be from this specialist type of housing.
- 8.15 If the residential moorings are envisaged as being additional to the 1,500 conventional homes then, alongside the leisure moorings, the whole marina concept requires an exceptional circumstances case for it to be identified. No such case is presented in the evidence base for the JSP. Finally, the way that the plan making process is working, with a focus on selecting strategic development locations restricts debate around alternative development. There is no scope in the JSP process to have a debate that would normally take place within a Local

⁸ 1,400 to 2036

Plan. We have identified a genuine alternative that will not be tested in the JSP process.

- 8.16 The authorities cannot point to the separate exercise of selecting sites for non-strategic growth in the BANES Local Plan review as a credible substitute, as the 1,500 units for Keynsham will already be part for the Development Plan. There needs to be a feedback loop within an iterative JSP plan-making process that checks whether strategic locations represent the most appropriate placed based strategies.

9. POLICY 7.3: LAND AT BATH ROAD BRISLINGTON (BRISTOL)

9.1 For ease of reference we set out the capacity and deliver expectations of this SDL below.

	Regulation 18 JSP		Publication JSP	
	Capacity	to 2036	Capacity	to 2036
Brislington	0	0	750	750

9.2 The drawing of a new Green Belt boundary based on the administrative boundary does not reflect the need to review boundaries based on physical features on the ground, as described in paragraph 85 of the NPPF. Given the requirement in Policy 7.2 for a new A4-A37 link to enable development at Whitchurch, it would appear logical to redraw the boundary based on that alignment. The Stage 2 'Green Belt Assessment' notes, in relation to South West Bristol that the land within the recently-completed South Bristol link and the urban edge has had its Green Belt function much reduced to the extent that it is not necessary to keep the land permanently open. The same logic should be applied to the Brislington/Hicks Gate area, especially given the likely siting of a replacement park and ride to the south of the Hicks Gate roundabout. Drawing a new Green Belt boundary based on the administrative boundary would leave an area of urban fringe land 'locked out' of a logical development concept. Boosting development in this location would make the most in A4 Rapid Transit Scheme. There are around another 1,000 dwellings that could come forward at Hicks Gate that would be in an extremely sustainable location and are deliverable early in the plan period.

9.3 We also question whether the Callington Link Road is a pre-requisite for development at Brislington. It is hard to see why traffic generated by the Brislington SDL would make significant use of the Callington Link Road.

10. POLICY 7.4: BACKWELL & POLICY 7.7: NAILSEA, (NORTH SOMERSET)

10.1 For ease of reference we set out the capacity and deliver expectations of these SDLs below.

	Regulation 18 JSP		Publication JSP	
	Capacity	to 2036	Capacity	to 2036
Backwell	700	700	700	700
Nailsea			3,300	2,575
Total			4,000	3,275

10.2 Nailsea is scheduled to deliver housing from 2025/26, which means commencement in 2024/25 and Backwell from 2029/30, with commencement in 2027/28. We have few concerns with the trajectory for Backwell (assuming the infrastructure funding is secured), but note that Nailsea is programmed for 7 years of consistent delivery at 300 dwellings per annum towards the end of the plan period. Together with Backwell, the assumed rate of delivery is 375-400 dwellings per annum, which seems rather bullish for this growth point as a whole.

10.3 We consider these two SDLs together as they form one strategic growth point. We have no issues with the selection of these areas as strategic development locations from a sustainability perspective. On balance, given the need to maximise non-Green Belt development, this area performs well. We note the potential for increased patronage of Nailsea & Backwell Station, affording access to both Weston and Bristol. These are sustainable locations outside the Green Belt and could be made more sustainable, but it will be expensive as development needs to be mitigated with the delivery of:

- a new multi-modal link from A370 Long Ashton Bypass to station interchange (including rail crossing), new development area and Nailsea town centre, with connection to A370 west of Backwell (including rail crossing) and a new or improved connection to the M5; and
- a new MetroBus route linking Bristol to Nailsea from Long Ashton Bypass to the station interchange (including rail crossing), new development area and Nailsea town centre, and onward link to Clevedon via M5 J20 link.

- 10.4 It is not clear what is meant by a new or improved connection to the M5 in respect of whether a new spur is needed off the Junction 20 roundabout at Clevedon or whether vehicles are to travel through Clevedon to reach Junction 20 from the west (which seems improbable). Clarification is required.
- 10.5 Policies 7.4 and 7.7 of the JSP also state that the phased delivery of highways infrastructure with development 'may be explored'. We are not clear what this means. Does it mean that the default position is (as for Keynsham and Whitchurch) that there are to be no completions prior to the infrastructure being in place completed (pending further investigation in the North Somerset Local Plan review process), or that some degree of phasing is expected but that the Council does not know what is possible yet?
- 10.6 As is the case with Keynsham and Whitchurch, funding to enable the transport projects and related housing development needs to be secured and spent in the same period. It seems unrealistic to expect all the infrastructure projects needed to deliver the overall trajectory for the SDL's to be funded and completed within a relatively short period.

11. POLICY 7.5: BANWELL & 7.6: CHURCHILL (NORTH SOMERSET)

11.1 For ease of reference we set out the capacity and delivery expectations of these SDLs below.

	Regulation 18 JSP		Publication JSP	
	Capacity	to 2036	Capacity	to 2036
Banwell			1,900	1,900
Churchill			2,800	2,675
Total	5,400	5,400	4,700	4,575

11.2 We have both sustainability and deliverability objections to the selection of these SDLs. The locations are not currently sustainable enough for this level of development, and cannot be made so. These will be extremely car-dependent locations and in that way, differ markedly from Nailsea and Backwell.

11.3 Our view is strongly that no development should take place at either of these locations and that the housing should be redistributed to more sustainable locations in the West of England that are closer to the urban edge of Bristol. North Somerset Council appears to be strongly opposed to development in the Green Belt on the edge of Bristol, but from a technical land use and transport planning perspective there really is no argument against it. Whilst the authorities are rightly looking for sustainable development options in non-Green Belt locations, Banwell and Churchill do not make the grade.

11.4 In respect of Banwell Bullet 6 of Policy 7.5 states that

"Development will not commence until the construction of the Banwell Bypass is delivered as part of the M5 to A38 highway improvements with connection to a new M5 Junction 21a at a location to be confirmed, and onward connection to the Sandford/Churchill Bypass."

11.5 Whereas in respect of Churchill, bullet 8 simply requires a:

"Package of highway schemes including a new M5 junction, Banwell Bypass, Sandford/Churchill Bypass and capacity improvements to A38/A368 junction. Bus service improvements to Bristol and Weston-super-Mare, including the potential for Metrobus".

11.6 It is not clear whether there is a transport infrastructure pre-requisite for Churchill as well as Banwell. It seems unlikely that any development could take place at Churchill until there is a Banwell bypass and a new junction. The policy should be redrafted to confirm this, should the policy remain in the plan.

11.7 Table 13-1 of the JTS states that the cost of M5 Junction 21A and the Banwell, Saltford and Churchill Bypass is £440m at future outturn costs. The bypass will include 14km of dual carriageway. This is a very significant undertaking. Secretary of State approval will be needed for the new junction and many landowners will be involved in the route of the new road.

11.8 Figure 5-1 of the JTS indicates that the new bypass will facilitate westward movements from the new settlements to Weston. However, there will also be an increase in travel-to-work movements to Bristol to the north east. Figure 5-1, in association with Table 13-1 of the JTS shows that 7.5km of single carriage way road improvements (£85m) will be needed between Langford and the Airport and £320m will be needed for a 7.5km dual carriageway between the Airport and the edge of Bristol.

Figure 5-1 of the JTS



11.9 No mention is made of this in Policies 7.5 and 7.6 or the link between the implementation of this infrastructure and development of the proposed 'garden villages'.

11.10 The housing trajectory for Banwell in the SDL Templates shows that first completions are programmed for 2024/25, meaning commencement in 2023/24. Churchill is due to commence a year later in 2024/25 and start to generate completions in 2026/26. It is highly doubtful whether the housebuilding industry would be interested in committing to these two schemes, within such close proximity within such a short space of time (or that the industry would be able to do so, because of the limitations of demand and supply-side considerations).

11.11 These two SDLs would also have to compete with Nailsea and Backwell in North Somerset for infrastructure funding, and with infrastructure funding for commitments and SDL's in BANES and South Gloucestershire. Comparing Policies 7.5 and 7.6 with Policy 7.8 (Buckover) shows an inconsistency in the Plan. Policy 7.8 for Buckover refers to the need for an appropriate delivery body to address land value capture, governance, community ownership, and management of assets. No such agenda is suggested for the North Somerset Garden Villages. This difference needs to be justified or Policies 7.5 and 7.6 amended.

12. POLICY 7.8: BUCKOVER, 7.9: CHARFIELD & 7.11: THORNBURY (S. GLOS)

- 12.1 Buckover is a large and remote strategic location that will need significant infrastructure, including M5 J14 and Metrobus A38 extension, Charfield rail station and the need to maintain strategic capacity on the A38.
- 12.2 The development will result in coalescence with Thornbury and the large-scale infrastructure and utilities costs could have serious implications in terms of viability.
- 12.3 The lead in time and viability of this planned new settlement lead us to conclude that any development within the Plan period could be problematic and certainly the indicative figure of 1500 highly questionable.

13. JSP CHAPTER 5: DELIVERY AND IMPLEMENTATION

13.1 There is no policy to comment on here. We have already commented on the challenges of implementing many of the proposals, especially some SDLs, because of their heavy requirements for investment in planning, infrastructure, land assembly, development co-ordination and asset management.

13.2 Chapter 5 (Delivery and Implementation) shows no recognition of the scale of the challenge and offers no solutions, beyond general statements of intent:

- *'finding new ways and models of delivery'...*
- *'infrastructure delivery will be enabled through the most appropriate blend of funding and range of funding mechanisms from the West of England and our partners'...*
- *'different sources of funding will be proactively sought and brought together'...*
- *'positive planning in this way will support opportunities to accelerate sustainable growth'...*
- *'where appropriate and necessary we will actively look to use Compulsory Purchase Powers (CPO) to undertake land assembly and to resolve barriers to the delivery of new homes, jobs and supporting infrastructure.'*

13.3 It is not clear whether the local authorities believe they can perform all these functions or whether they propose to create one or more delivery agencies for the SDLs, using New Towns legislation or other models. There are funding issues that transcend local authority boundaries, especially in relation to devolved funding to the West of England Combined Authority which does not directly benefit North Somerset. It would be risky to adopt the JSP proposals without knowing more about how they are to be implemented, beyond their incorporation in local plan reviews.

APPENDIX 1

COMPARATIVE TABLE OF JSP STRATEGIC DEVELOPMENT LOCATIONS

Comparative table of JSP Strategic Development Location (SDLs)

Need /Supply Source	LPA	Green Belt	Nov 2016 JSP	Nov 2017 JSP	Per Annum	Difference	Post 2036
WoE Objectively Assessed Need			97,800	97,800	4,890		
Housing Requirement			102,200	102,200	5,110		
Housing Supply Strategy (3,300 Flexibility)			105,500	105,500	5,275		
Proposed CLG OAN Method				116,500	5,825		
<i>Difference to WoE OAN</i>				18,700	935		
<i>Difference to WoE Housing Requirement</i>				14,300	715		
<i>Difference to WoE Supply Strategy</i>				11,000	550		
Housing Commitments at 2016			66,000	61,500		-4,500	
Supply Strategy Gap			39,500	44,000		4,500	
Proposed Supply Sources			39,500	44,060			
Urban Living			14,600	16,200		1,600	
Small Windfalls (9 or below)*			0	6,860		6,860	
Non-Strategic Growth			3,400	3,400		0	
Strategic Development Locations (SDL)			21,500	17,600		-3,900	
Breakdown of SDLs							
1. Brislington	Bristol	GB	0	750		750	
2. North Keynsham	BANES	GB	1,100	1,400		300	100
3. Whitchurch	BANES		3,500	1,600		-1,900	900
4. SW Nailsea	North Soms		3,600	2,575		-325	725
5. Backwell	North Soms			700			
6. NW Langford & Churchill	North Soms		5,400	2,675		-825	125
7. NW Banwell	North Soms			1,900			
8. Buckover	South Glos		2,200	1,500		-700	1,500
9. Charfield	South Glos		1,000	1,200		200	
10. Coalpit Heath	South Glos	GB	1,500	1,800		300	
11. NW Yate	South Glos	GB	2,600	1,000		-1,600	1,000
12. N&E Thornbury	South Glos		600	500		-100	
			21,500	17,600		-3,900	4,350
Contingency Locations (5 Year Review)							
South of Chipping Sodbury		GB	0	775			775
NW Yate (Additional Land)		GB	0	225			
East Clevedon			0	1,500			
Non-Strategic S.Glos			0	500			
Non-Strategic BANES			0	100			
				3,100			775

*Note: it is likely that in Nov 2016, small windfalls were counted within 'commitments', whereas in Oct 2017 they are counted separately

Local Authority Breakdown	CLG New Method		JSP Policy 1		
	Total	Per Annum	Total	Per Annum	Difference
Bristol	48,400	2,420	33,500	1,675	-14,900
Bath and North East Somerset	12,520	626	14,500	725	1,980
North Somerset	26,100	1,305	25,000	1,250	-1,100
South Gloucestershire	29,480	1,474	32,500	1,625	3,020
South Gloucestershire	116,500	5,825	105,500	5,275	-11,000

Local Authority Breakdown (with Contingency)	CLG New Method		Potential Supply to 2036		
	Total	Per Annum	Total	Per Annum	Difference
Bristol	48,400	2,420	33,500	1,675	-14,900
Bath and North East Somerset	12,520	626	14,600	730	2,080
North Somerset	26,100	1,305	26,500	1,325	400
South Gloucestershire	29,480	1,474	34,000	1,700	4,520
Total	116,500	5,825	108,600	5,430	-7,900

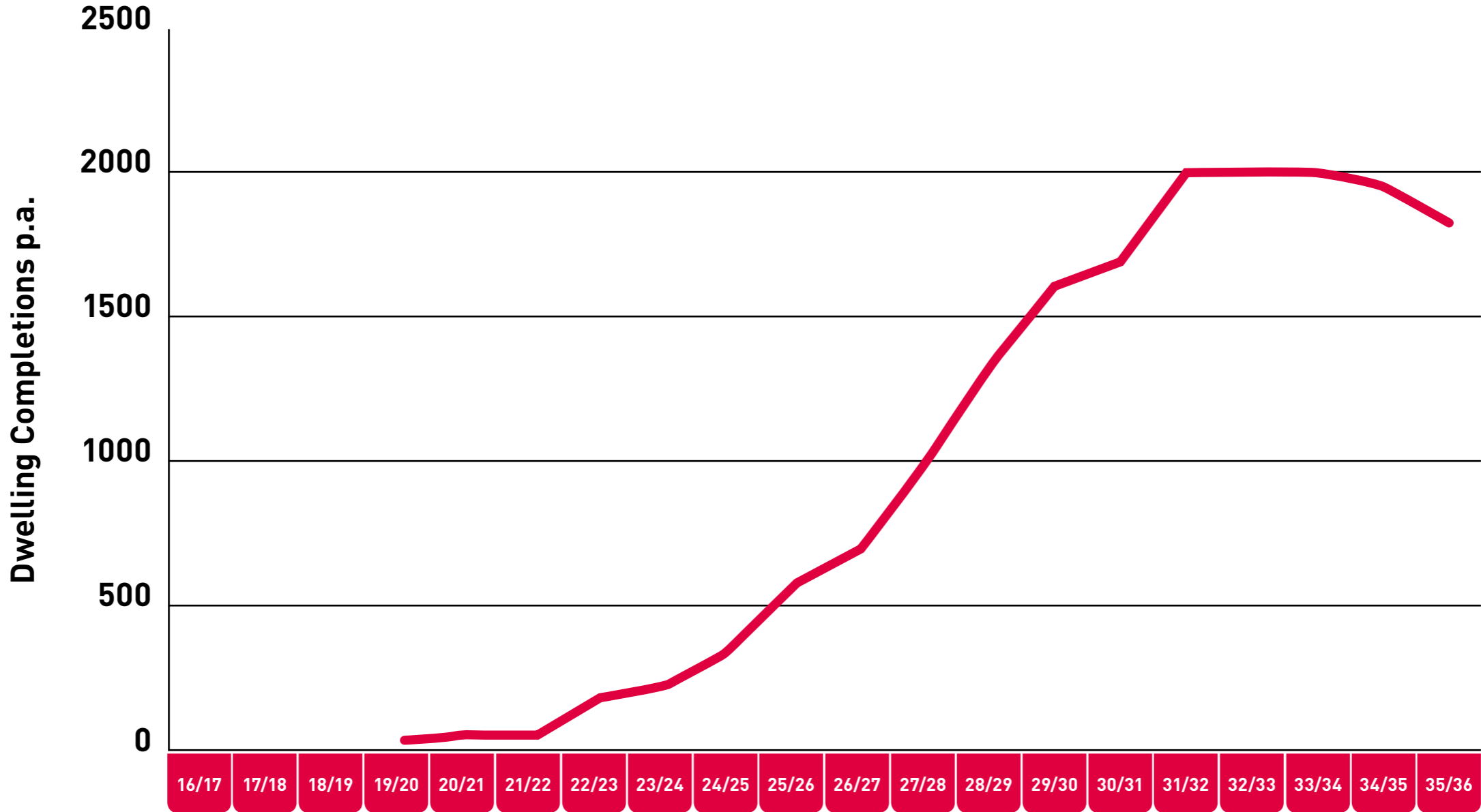
APPENDIX 2

COMBINED HOUSING TRAJECTORY FOR JSP STRATEGIC DEVELOPMENT LOCATIONS

Housing Trajectory for JSP Strategic Development Locations (SDLs)

			Total Capacity	JSP Period	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Post 2036
Bristol	Brislington	Green Belt	750	750																150	150	150	150	150	
BANES	North Keynsham	Green Belt	1,500	1,400												50	100	150	200	200	200	150	200	150	100
BANES	Whitchurch	Green Belt	2,500	1,600														50	150	250	250	300	300	300	900
North Somerset	SW Nailsea		3,300	2,575										50	75	150	200	300	300	300	300	300	300	300	725
North Somerset	Backwell		700	700													50	75	100	100	100	100	100	75	
North Somerset	NW Langford & Churchill		2,800	2,675										50	75	150	300	300	300	300	300	300	300	300	125
North Somerset	NW Banwell		1,900	1,900									50	75	150	200	200	200	200	200	200	150	75		
South Gloucestershire	Buckover		3,000	1,500												50	100	150	150	200	200	200	200	250	1,500
South Gloucestershire	Charfield		1,200	1,200							50	50	100	150	150	150	150	150	100	100	50				
South Gloucestershire	Coalpit Heath	Green Belt	1,800	1,800							50	100	100	150	150	150	150	175	150	150	150	100	75		
South Gloucestershire	NW Yate	Green Belt	2,000	1,000							25	25	50	50	50	50	50	50	50	50	100	150	150	150	1,000
South Gloucestershire	N & E Thornbury		500	500				30	50	50	50	50	50	50	50	50	50	20							
Total								30	50	50	175	225	350	575	700	1,000	1,350	1,620	1,700	2,000	2,000	2,000	1,950	1,825	
			21,950	17,600	5 Year Supply Period from March 2018																		4,350		

Trajectory of SDLs



APPENDIX 3

ESTIMATED COSTS OF SCHEMES IN THE TRANSPORT VISION

Table 13-1 Estimated costs of schemes in Transport Vision

Component of Transport Vision	2018 costs, including risk allowances (£m)	Estimated future outturn costs (£m)	Assumptions
Behaviour Change and Future Proofing Programme			
Greater Bristol Programme	£100	£100	Assumes £200k cost per resident for next 20 years
Electric Vehicles Programme	£50	£75	Nominal allowance
Connected and Autonomous Vehicles Programme	£50	£75	Nominal allowance
Behaviour Change and Future Proofing Total	£200	£250	
Strategic Cycle Routes			
Greater Bristol Cycle Network	£200	£200	Assumes 120km new strategic routes
Bath Cycle Network	£30	£50	Assumes 20km new strategic routes
Weston Cycle Network	£50	£50	Assumes 20km new strategic routes
Strategic Cycle Routes Total	£280	£300	
Bus Network			
Greater Bristol Bus Network (including Bath)	£150	£200	Assumes total of 50km upgraded routes
London City Centre Movement Strategy	£10	£100	Assumes works to 10km of canyons
Weston Bus Network	£30	£50	Assumes 10km upgraded routes
Bus Network Sub-total	£240	£350	
MetroBus			
Weston super-Metro	£35	£50	Assumes 8km route length including bus lanes
Cowden and Nurdes to Bristol	£10	£25	Assumes 1.5km new road to be improved
Schemes to City Centre	£30	£45	Assumes 5km of minor infrastructure works
Thames Valley and Busloop to Bristol	£70	£100	Assumes 1km of minor and major works
FRM to Bristol	£10	£10	Assumes 1km of minor works and new M4 to FRM
Orbit MetroBus (Whitchurch - Hicks Gate - Emersons Green)	£30	£130	Assumes 4km new corridor + 1km works to Ring Road
Hicks Gate - Bath (extension of Mass Transit Corridor)	£100	£140	Assumes 14km of major and minor works
Northgate connection	£10	£15	Assumes 10km of major and minor works
MetroBus Sub-total	£495	£705	
Mass Transit			
Bristol to Airport (surface / underground running)	£100 - £1,200	£100 - £1,000	1.5km from city centre to Airport
Bristol to North Fringe (surface / underground running)	£400 - £1,400	£500 - £2,100	10km from city centre to Gribbs Causeway
Bristol to Park Parade (surface / underground running)	£100 - £1,000	£100 - £2,000	1.5km from city centre to Park Parade Green
Bristol to Hicks Gate (surface running)	£200	£300	6km from city centre to Hicks Gate
Mass Transit Sub-total	£1,700 - £4,440	£2,580 - £5,680	
Park & Ride - expansion and new sites			
Greater Bristol Park & Ride Package - major site at N32	£50	£75	Assumes 2000 spaces + major access works
Greater Bristol Park & Ride Package - other new sites + expanded sites	£50	£75	Assumes up to 5000 new spaces
Bath Park & Ride Package	£20	£30	Assumes up to 1500 new spaces + access works
Weston Park & Ride	£10	£15	Assumes up to 600 new spaces + access works
Park & Ride Sub-total	£130	£195	
Rail			
New stations	£80	£120	Assumes 5 new stations
Improvements to existing stations	£10	£120	Assumes 10 stations improved to meet demand
Upgrades to rail network (network capacity, electrification)	£300	£750	
Rail Sub-total	£490	£990	
Road Network			
East of Bath Link	£75	£100	Assumes 2.5km single carriageway
Ware Lane and Fromton Colliery Bypass (supporting A303 SDU)	£70	£95	Assumes 4.5km single carriageway
M4 J10A and links to Ring Road	£195	£285	New junction + provision for up to 5km new link + widening
Link from M4 J18A to Yale	£95	£140	5km single carriageway link
Connections between A4 and Bath - Bristol Road (Dorset MetroBus)	£125	£175	Assumes 1km new single
Whitchurch Distribution Road (supporting Whitchurch SDU)	£25	£30	Assumes 1km single carriageway
Avon Mill Lane - A4 Link, Keynsham (supporting Keynsham SDU)	£40	£55	1.5km single carriageway + rail bridge
Collington Road (supporting Avon - Lower to Park Road)	£15	£15	1.5km single carriageway
M5 J21A and Danwell, Sandford and Church II Depass	£300	£440	New J21A + 10km dual carriageway
Upgrades of A38 between Airport and Longford	£55	£85	Assumes 7.5km route upgrade
Upgrading of A10 between 118 and Bristol Airport	£220	£320	Assumes 6km dual carriageway
Nailsea Corridor Improvement (local Nailsea MetroBus, see above)	£200	£300	13km single carriageway + 2 rail bridges
Weston Area Passage (incl M5 junction improvements)	£40	£60	Junction improvements + new rail crossings
M5 Smart Motorway M5 J10-J19	£100	£150	Assumes 12km of works to M5
M5 Smart Motorway M5 J17-J21A	£300	£500	Assumes 25km of works to M5
M5 Junction 14 Improvements	£15	£30	Additional junction + replacement of P150N
M5 Junction 19 Improvements	£25	£35	Assumes works to slip roads and A309
Improvements to local road networks	£30	£50	Allowance for other junctions on network
Road Network Sub-total	£2,110	£3,035	
All Components - Total	£8,115 - £8,835	£8,905 - £12,885	
All Components - Total (assuming surface light rail)	£8,115	£11,385	
All Components - Total (assuming light metro)	£8,836	£12,886	

Note: all costs are indicative and are based on estimated lengths of infrastructure and the application of unit rates. In all cases the schemes are conceptual and will need to be developed in greater detail to inform business cases and planning processes. A study has recently been taking place to assess options for a connection from M4 J18A to the Ring Road: the JTS has assumed a general route alignment with no preference for any specific alignment option. The J18A study will report in March 2018.

APPENDIX 4

LAND AT WOODHOUSE DOWN, ALMONDSBURY SITE PLAN AND ASSESSMENT

Woodhouse Down

Garden Community



Feasibility & Vision Statement

January 2018



First Floor,
South Wing,
Equinox North,
Great Park Road,
Almondsbury,
Bristol,
BS32 4QL

www.pegasusgroup.co.uk
T 01454 625 945

■ PLANNING ■ DESIGN ■ ENVIRONMENT ■ ECONOMICS

Prepared by Pegasus Group

January 2018 | Project code P16-1123

COPYRIGHT The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Ltd.
Crown copyright. All rights reserved, Licence number 100042093.

Contents

1. Background

Introduction
The Study Area

2. Establishing the Vision

The Vision
Concept Options
Indicative Masterplan

3. Understanding the Study Area

Summary of Opportunities and Constraints
Landscape and Visual
The Green Belt
Built Heritage
Biodiversity, Flood Risk and Drainage
Utilities
Sustainability, Access and Movement
Conclusions







1. Background



Introduction



This promotional document has been produced by Pegasus Group on behalf of Edward Ware Homes. Its purpose is to present the potential for a sustainable new community in South Gloucestershire, to the north of Almondsbury between the A38 (Gloucester Road) and the M5.

The West of England has a major housing challenge and an equally significant challenge in mitigating the transport effects of growth. The sustainability and deliverability of Woodhouse Down Garden Community against alternative options, and in the context of the West of England's Transport Vision, presents a strong case for removing land from the Green Belt in this location.

An extensive study area has been defined that is close to the built-up area of the city, including the major employment areas of Aztec West and Almondsbury Business Park, yet separate enough that a discreet new garden community can be created. From this location, there is a genuine opportunity to enable non-car based modes of travel to work. It is a location that can be delivered without any 'big ticket' pre-requisite infrastructure costs e.g. a new road or a new motorway junction. Consequently land value uplift can be dissected to matters such as 'smart energy' solutions as well as sustainable transport and cycling infrastructure.

Key constraints and opportunities have been identified and a vision-led approach has been taken to define development options. This has resulted in the identification of a core area between Hortham Lane and the northern boundary of Tockington Park Wood that could accommodate around 2000 homes, retirement housing, a 2-3 form entry primary school, and a community hub.

An additional area of development at the North end of the study area could be brought forward at a later stage if required to meet housing needs and will adopt the same principles in terms of design as the southern area.

The identification of a new community in this location would add to the existing settlements of Almondsbury, Alveston and Thornbury that are served by the A38, whilst respecting their separateness and identity.

Woodhouse Down Garden Community presents a more sustainable option, with fewer adverse effects, and better deliverability credentials than many of the 4,200 homes that are currently proposed in the West of England Joint Spatial Plan at Buckover and Charfield, and some of the other strategic development locations that have been proposed for the sub-region.

Planning Policy Context

The Publication version of the Joint Spatial Plan for the West of England (2016-2036) was published for consultation on November 22nd 2017. It represents a strategic development plan for Bristol City, South Gloucestershire, North Somerset, and Bath & North East Somerset Councils.

The Joint Spatial Plan does not start from a blank canvass. Existing development plans variously seek to enable the delivery of 61,500 homes up to 2026-2029.

The Joint Spatial Plan extends the time horizon for development plans to 2036, by which point a housing requirement of 102,500 homes has been set, with 105,500 homes planned to give a limited degree of flexibility.

Edward Ware Homes has made representations on the Joint Spatial Plan, highlighting that insufficient land has been identified to meet the true future housing needs of the Bristol urban area and that the selection of some of the strategic development locations that are proposed and their deliverability are not justified.

For both reasons, additional housing land needs to be identified. South Gloucestershire has reasoned that there are exceptional circumstances for removing land from the Green Belt, and thus, given the need for additional land, Woodhouse Down Garden Community should be identified as an alternative or additional strategic development location in the Joint Spatial Plan. The land should be removed from the Green Belt, or safeguarded in the parallel review of the South Gloucestershire Local Plan.



The Study Area



A strategic study area has been identified to the north-east of Almondsbury and is contained by the M5 to the south-west, the M4 to the south-east, the A38 (Gloucester Road) to the north-west, the B4427 (Church Road) to the north-east. The M5 is accessed via the junction of the A38 with Junction 16 at Almondsbury, and connects immediately with the M4.

The study area measures around 1.5km from east to west, around 2.3 km from north to south, and covers around 355.128 hectares.

Key areas of settlement within the study area include: 'Hortham Village', a development of 250 homes on the site of the former Hortham Hospital, south of Hortham Lane; a cluster of housing to the south of Woodhouse Avenue; and Rudgeway to the north.

The study area is located within the Green Belt but is not covered by any specific landscape designations. Other relevant designations include a scheduled monument toward the northern end of the study area (Ruin of St Helen's Church), listed buildings at the northern end of the site, and also at Tockington Park Farm toward the centre of the site. Both Hortham Wood and Tockington Park Wood are designated as ancient and semi-natural woodland. Several public rights of way cross the study area.

Other physical constraints include the route of two gas pipelines that pass just to the south of Tockington Park Farm, and overhead transmission lines that pass between Hortham Wood and Hortham Farm.

A feature of the study area is the presence of two places of worship that are served from Hortham Lane. The Bristol Gospel Hall was permitted in 2011 as a departure from Green Belt policy and its construction has replaced the former glasshouses and greenhouses of Hortham Nurseries. The Bristol Assembly Hall to the west is another meeting place, permitted in the early 1990s.

Hortham Farm/Court Farm contains a number of large agricultural storage buildings and operates in part as 'Bristol Caravans', offering indoor and outdoor storage and servicing.

To the south of Hortham Lane, at Colony Farm the land has extant permission for the erection of a clubhouse, store, floodlights and construction of new access, as well as the change of use of 11.3 ha of land from agriculture to sports playing fields for Bristol Rovers Football Club.



Study Area Location with the WoA of England.





CHANDLERS YARD



2. Establishing the Vision



The Vision



Further to the analysis of constraints & opportunities presented in Section 3, seven key design principles for the establishment of a new community within the study area have been established.

1. **'An Identifiable place'**
Development will seek to identify and establish a character that draws from that of the surrounding context and is informed by the existing site features.
2. **A 'Mixed-use community'**
Not only will the development deliver a local centre with a mix of uses, there will be public open space, a primary school and easy access to employment at Aztec West and Almondsbury Business Park.
3. **A 'Walkable place'**
The community facilities, open spaces and day-to-day needs will be within convenient and attractive walking distance of the residential areas.
4. **'Transport choices'**
An accessible place that addresses the need to accommodate the car safely and sustainably whilst providing for public transport alternatives, convenient footpaths and connections to cycling to Bristol.
5. **'Multi-functional green spaces'**
The landscape framework of green corridors and areas of open space will provide a setting for the development, accommodate SuDs, Borm ecological corridors, and provide a resource for the new and existing communities.
6. **'Streets and landscape corridors designed as places'**
The legibility of the place will be informed by the experience of the street and landscape spaces which provide attractive vistas through the development and revealing townscapes.
7. **'Quality homes'**
Residential areas will benefit from the social and environment infrastructure provided in equal measure, helping to foster community cohesion and local pride of place. Densities will seek to achieve a range of between 25 and 50 dwellings per hectare, averaging at around 38-40 dph.
8. **New facilities**
The proposed facilities will directly benefit the existing residents in the surrounding area including those on the former Hortham Hospital site.



Creating a legacy to be proud of

A sense of ownership, responsibility and civic pride will be key elements to the long-term success of Woodhouse Down Garden Community Village. To ensure its long-term prosperity, a Community Interest Company (CIC) can be established. All residents of the development can become members, empowering them to safeguard and manage their community assets in a way which best suits them. The CIC can be funded in the early stages by the master developer alongside annual contributions from members. All of the community assets at Woodhouse Down Garden Community will be owned by the CIC and all revenues generated from any asset will be returned to the CIC and its members.



Headline Benefits

- Excellent access to jobs, leisure, retail and infrastructure in the North Fringe;
- Early Deliverability Credentials;
- No 'big-ticket' highway infrastructure costs;
- A new community of 2,000 homes for South Gloucestershire combining the best of country/town living;
- Potential for future growth at the north of the study area.



Concept Options



Southern Development Area (Phase 1 – Within the current JSP period)

This is an area of more intensively used agricultural land, and could accommodate around 2,000 homes and supporting social infrastructure. It relates to the main area of settlement within the study area at the redeveloped Hortham Hospital and Woodhouse Down. Much of the land is visually contained and of limited landscape value. Appropriate stand-offs would be provided in respect of Tockington Park Wood and Hortham Wood and there would be no harm to the setting of heritage assets. As set out in the transport evidence, all of the employment, retail made leisure facilities of the North Fringe are within a 5km cycle, and bus services are frequent, can be diverted in to the site, and are set to be enhanced with the extension of Metrobus to Thornbury.

Central Green Corridor

This area of the study area is not proposed for development on account of landscape, heritage and Green Belt constraints. It will be important to leave a Green Belt gap between the A38 and the M5 and between the development proposed, Alveston and Thornbury further to the north. The extent of the green corridor will be determined following further technical studies.

Northern Development Area (Phase 2 – Plan Review)

The concept here would be a 1,000-home expansion of Rudge Way, to the south of Church Lane, with a 1FE primary school. This area is more visible in the landscape and greater consideration is needed in respect of master planning in the context of heritage assets.



Concept Plan

Indicative Masterplan



Illustrative Masterplan

- The southern development area can be further broken down into three character areas, and the planning of non-residential uses is set out by reference to each area;
- An illustrative masterplan has been prepared for the proposed southern development area;
- As a whole the masterplan provides 56 ha of residential land, which could accommodate 2130-2240 dwellings at 38-40dph.

1. Hortham Farm

- The master plan provides 23 ha of residential development land, yielding 875-920 dwellings at 38-40dph;
- This area would be accessed from Hortham Lane to the south and Woodhouse Avenue to the east;
- Views of the area are presented in Plates 1, 2 and 5 in the landscape section of this statement;
- 50m development stand-offs are provided in respect of Hortham Wood and Tockington Park Wood, and a green corridor is provided between the two areas of ancient woodland to promote connectivity.
- Key hedgerows are retained
- A 20m amenity buffer is provided either side of the National Grid with the land beneath forming part of the sustainable urban drainage system, linking to secondary networks within the development area itself;
- This part of the site also provides sufficient land for a 3 form entry primary school and a 0.8ha local centre, to host retail and community uses;
- The provisions of these uses on the southern part of the site assist in integrating the new community with Hortham village;
- The internal road network would be designed to accommodate a bus route, connecting to the other character areas.

2. East of the A38

- The master plan provides 18 ha of residential development land, yielding 685-720 dwellings at 38-40dph;
- This area would be accessed from the A38, with a vehicular connection also possible from the Hortham Farm area;
- A landscape buffer is provided in respect of Tockington Park Wood;
- Key hedgerows are retained;
- All the proposed housing is within 400m of the bus services that run along the A38;
- Around 2.5ha could be reserved near to the BP petrol station for a 700-750-space park and ride facility;
- The BP Petrol Station provides a walkable local food retail unit;
- Land between the north extent of the development and Tockington Park Wood could provide some playing pitches for the development.

3. North of Hortham Wood

- The master plan provides 15 ha of residential development land, yielding 570-600 dwellings at 38-40dph;
- This area would be accessed from the character area to the south, and the objective would be to achieve bus stop accessibility so that all homes were within 400m;
- A view of this area is presented in Plate 3 in the landscape section of this statement;
- 50m development stand-offs are provided in respect of Hortham Wood and Tockington Park Wood and an ecological corridor is provided between the two areas of ancient woodland;
- This corridor helps to define character differences within the site and promote ecological interconnectivity and biodiversity;
- Trackways through Tockington Park Wood could become part of the walking infrastructure network, linking this area frequent bus services on the A38;
- Development would be set back from the northern boundary, landscaped and used for attenuation;
- Gas pipe diversions would be needed to enable development in the northern 1/3 of this character area.







3. Understanding the Study Area



Summary of Opportunities and Constraints



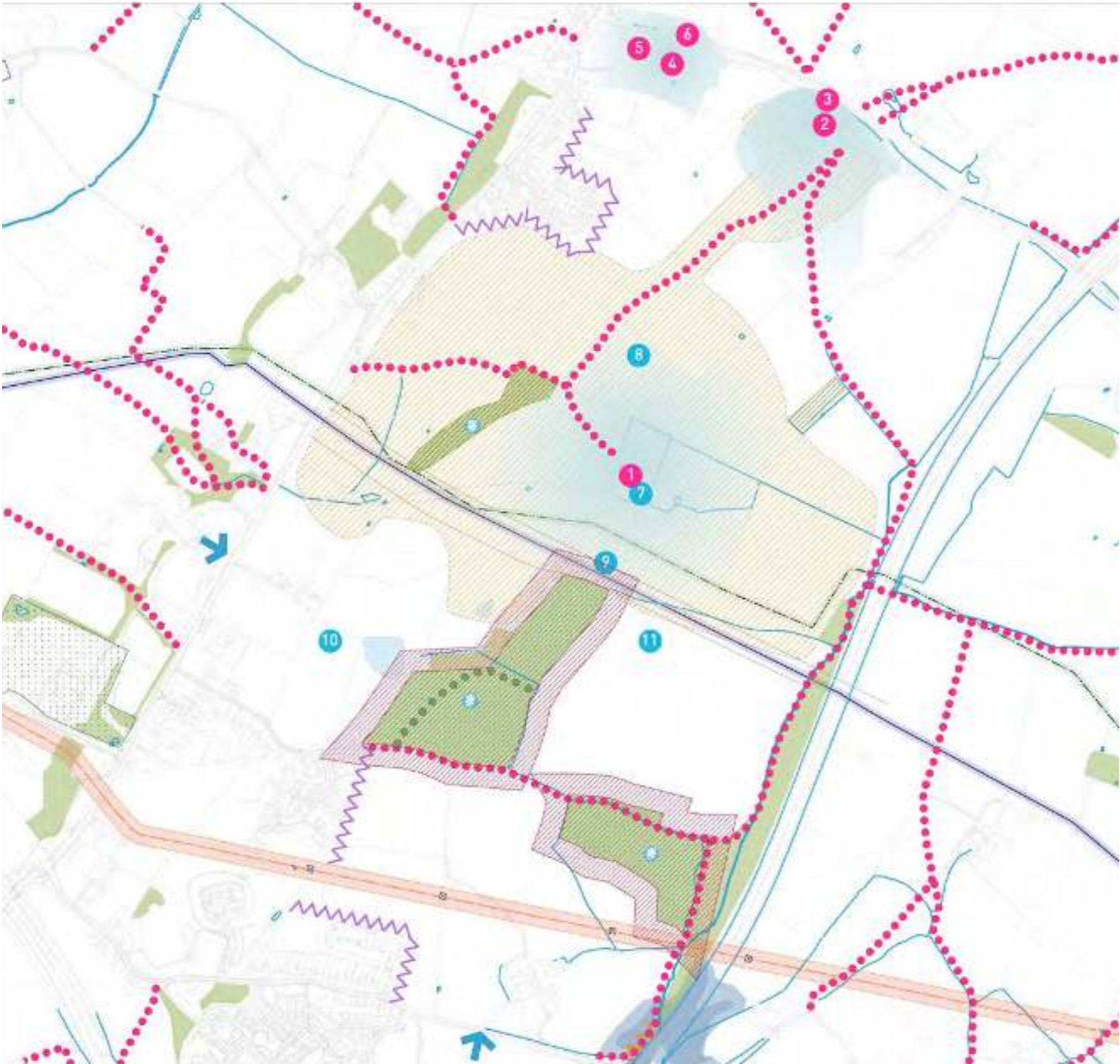
Opportunities

- Areas of existing settlement and development in the south of the study area, including Hortham Village, Woodhouse Avenue, religious meeting places, and Bristol Rovers training ground;
- Scope to create a greater critical mass to support a greater range of local services and facilities, including a primary school and local centre;
- Good connectivity to Aztec West and Almonsbury Business Park – both within cycling distance and with a good bus service with reasonable travel times, also available along the A38 including to the north to employment in Thornbury;
- Intensification of the A38 as a public transport corridor via the extension of Metrobus;
- Excellent access to the motorway network;
- Large areas in the southern and northern parts of the site that are of a more intensive agricultural character and less sensitive to change;
- Large area in the south of the study area that is free of heritage constraints;
- Little apparent need for significant highways infrastructure to enable development to take place;
- Strong short-term deliverability credentials;
- Area identified in the south of the study area where development effects on the Green Belt would be less apparent from the wider area; and
- Better sustainability and deliverability credentials than proposed strategic development locations further north and at places.

Constraints

- Gas Pipelines and Health and Safety Executive consultation zones in the centre of the study area, but with the potential to divert in a thicker walled pipe;
- National Grid transmission lines and pylons in the south of the study area that will remain in situ;
- Noise from the M5 to the east of the study area;
- Heritage setting for Tockington Park Farm in the centre of the study area, with associated areas of archaeological interest;
- Cluster of designated heritage assets in the north of the study area along Church Lane;
- Visual links with land to the east (beyond the M5), from the part of the study area to the north of Tockington Park Wood;
- A more parkland-style landscape in the central and northern parts of the study area;
- Greater Green Belt 'openness' effects if development placed along the A38 and other more visually exposed areas.

Constraints and Opportunities Plan



KEY:

- POTENTIAL ACCESS
- EXISTING TRACK
- INDICATIVE AREAS OF LANDSCAPE SENSITIVITY
- EXISTING WOODLAND
- EXISTING WATERCOURSE
- DESIGNATED HERITAGES ASSETS:
- EXISTING POWERLINES 12.5M BUFFER
- SENSITIVE BOUNDARY
- ANTICIPATED HIGH LEVELS OF NOISE
- ARCHAEOLOGY:
- ROMAN VILLA
- LINEAR ANTHRAPOLOGICAL REMAINS OF ROMAN BAYERN FIELD SYSTEMS
- DITCH ENCLOSED ROMAN CEMETERY
- ROMAN ROAD
- ROMAN ROAD
- INDICATIVE AREAS OF HERITAGE SENSITIVITY INCLUDING SETTING

DESIGNATED HERITAGES ASSETS:

- TOCKINGDON FARM FARM
- CHURCH FARM HOUSE
- RUINS OF ST HELLEN'S CHURCH / OLD CHURCH OF ST HELLEN
- PYPERS COUNTRY HOUSE
- PYPERS STABLES, WALLS & PERS
- PYPERS ENTRANCE GATES

ARCHAEOLOGY:

- ROMAN VILLA
- LINEAR ANTHRAPOLOGICAL REMAINS OF ROMAN BAYERN FIELD SYSTEMS
- DITCH ENCLOSED ROMAN CEMETERY
- ROMAN ROAD
- ROMAN ROAD
- INDICATIVE AREAS OF HERITAGE SENSITIVITY INCLUDING SETTING

Landscape and Visual



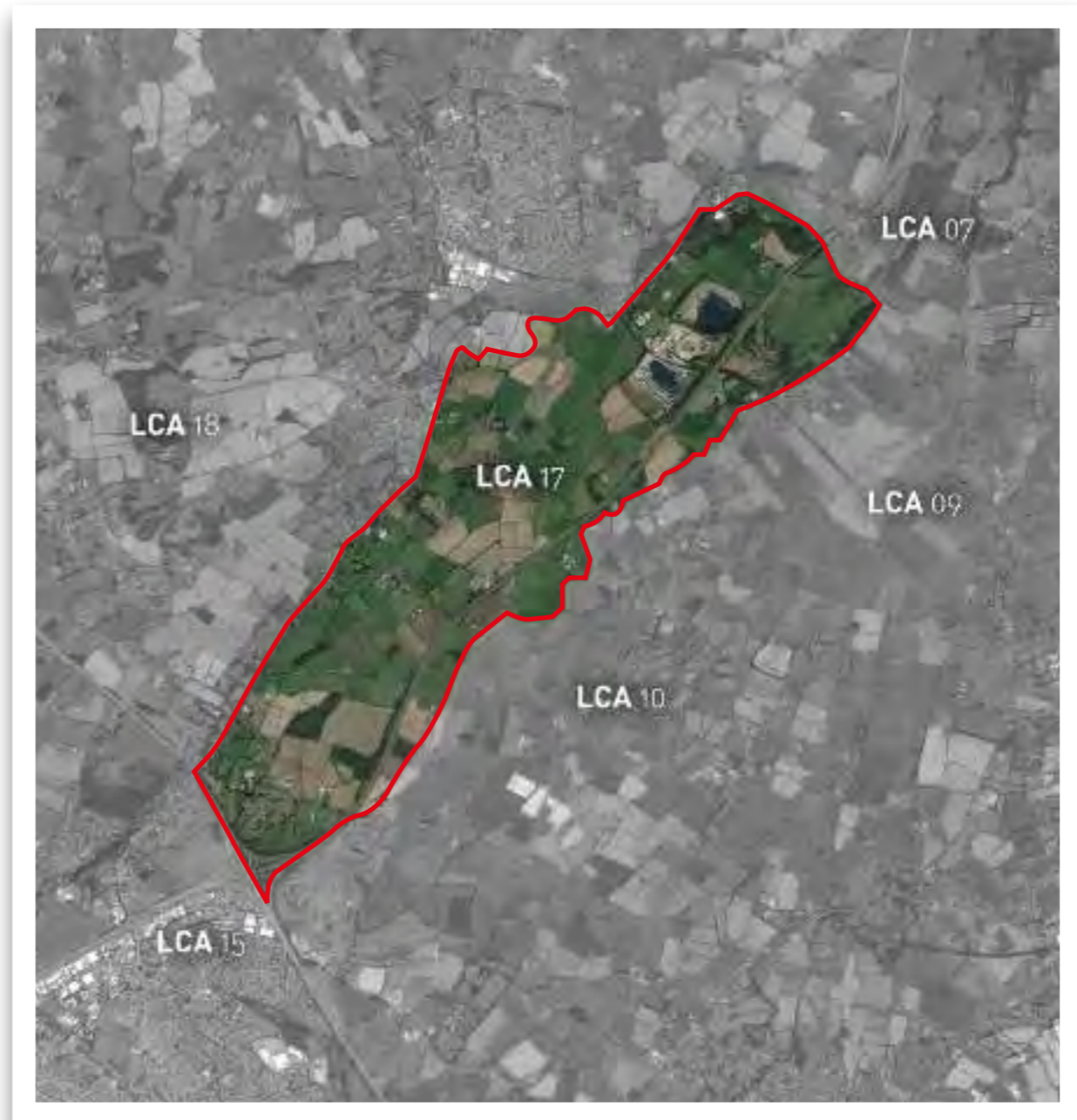
Study Area Context

At a national level the site is located in Natural England Character Area 118, the Bristol Avon Valleys and Ridges. Statements of environmental opportunity for NCA 118 include reference to conserving and managing the distinction between the transition zone of settlements, reducing the impact of the urban fringe and providing well designed green infrastructure.

At a more local level, character is defined by the South Gloucestershire Landscape Character Assessment (SPD, 2014). The study area is located in the southern part of LCA 17, Rudgeway and Tytherington Ridge. The landscape strategy for this character area sets out a need to ensure that new development respects the particular and distinctive landscape character within settlements and groupings of farm buildings; that the location and design of development considers the protection of the rural character and appearance of undisturbed rural ridges and skylines; and to promote an increase in tree cover on eastern-facing slopes and along the principal road corridors to reinforce landscape structure and mitigate impact on views from higher ground to the east.

Due to the elevation and east-facing slopes of a large part of the study area, there is a degree of inter-visibility with the character area immediately to the east, LCA 10, Earthcott Vale. The landscape strategy for LCA 10 includes reference to the urbanising influence of adjacent settlements and the motorway to be addressed by the retention and management of hedgerows (supported by small-scale woodland and hedgerow tree planting), and also considering 'off-site' planting to mitigate the impacts of highly-visible development in this and adjacent LCAs.

To the west the land drops away considerably from the scarp edge into the LCA18 Severn Ridges, within which the villages of Tockington and Odd Down sit.



South Gloucestershire Landscape Character Areas

Study Area Description

The study area comprises a series of small, medium and large-scale agricultural field parcels located on the northern edge of Bristol. The wider conurbation of Bristol in this area is contained by the motorway corridors of the M4 and M5. The study area sits beyond this but is equally contained by the highway corridors of the A38 and M5.

Across the wider context, the landform and topography is defined by the transition between the higher hills and scarp of the Cotswolds, westwards across the ridges and valleys that are formed by the various tributaries to the Rivers Avon and Severn, subsequently falling into the Severn Vales and to the Severn Estuary itself.

The study area is located in the transitional area between the ridges and valleys landscape, and the vale landscape further to the west; this change is broadly defined to the north-west of the A38 where the landform falls across a steep slope. Positioned to the south-east of this, the site is relatively separate from the Severn Vale but is more consistent with the character of the ridges and valleys to the east.

By reference to the ordnance survey plan on page 9, it can be seen that from the A38 the landform rises across a broadly even slope from between c +71m to 82m AOD up to a localised ridgeline at between c +85 and 90m AOD. The ridgeline runs across the site on a south-west to north-east orientation and is relatively prominent in middle distance views from the west it forms a particularly prominent landscape feature in views from the east e.g. Church Lane overbridge (plate 4). To the east of the ridge, the slopes fall toward the M5 corridor at between c 53m and 70m AOD. Further east the landform is characterised by a series of undulating hills and shallow valleys.

The vegetation structure across the study area comprises a series of well-established and mature hedgerows that define the field parcels. These vary slightly in terms of structure, subject to the frequency of hedgerow trees, with some sections of hedgerow effectively forming linear tree belts. In the north-east and south-eastern parts of the study area the larger field sizes, arable uses and lack of hedgerow trees present a more intensified character to the landscape (Plates 1, 2 + 3).

In the northern areas of the study area, the hedgerow trees and smaller-scale field parcels present a more estate/parkland character.

Woodlands are also a feature of the study area with several small and medium-scale woodland blocks present across the wider site area. This includes areas of ancient woodland at Tockington Park Wood (Plate 3) and Hortham Wood; a smaller copse at Gatten's Brake; and a linear belt of woodland that lines the corridor of the M5 motorway. The surrounding landscape context has a greater proportion of tree and woodland cover across the steeper slopes to the north-west of the site, whilst the wider landscape to the east is more open, defined generally by hedgerow field patterns and less so by woodland structure.

There is a good network of public rights of way, with several public footpaths crossing the northern part of the study area providing access around the southern edge of Rudgeway. In the southern part of the study area a public bridleway connects Woodhouse Down with Hortham Wood before turning south to connect with Hortham Lane. Toward the centre of the study area, on its eastern edge, the public footpath network crosses the motorway via a footbridge and provides connections to the network of public rights of way across this part of the landscape.



Plate 1: Land between Hortham Lane and Tockington Park Wood – looking SE from the end of Woodhouse Avenue.



Plate 2: Land between Hortham Lane and Tockington Park Wood – looking west to housing at Woodhouse Avenue on the horizon.

Transport and settlement patterns in the area are defined by the strong linear corridors associated with the M5 motorway and the A38 Gloucester Road. These routes define the eastern and western limits of the study area respectively. To the north, the study area is defined by the B4427 Church Road and to the south by Woodhouse Avenue and Hortham Lane. At this point the M5 corridor varies in terms of its openness, with the southern section semi-enclosed by trees and woodland but the northern stretch being more open to the landscape to the east and west.

The A38 is relatively enclosed along its length by the combination of mature vegetation and sporadic built form. Along the section between Tockington Park Lane/Abbotts Way and Rudgeway Park the landscape provides an area of separation between the settlements, and there are partial views to the west, toward the Severn estuary, and to the east up toward the ridgeline. Other settlement areas include residential estates at the redeveloped Hortham Hospital. In the wider landscape, settlement comprises scattered farmsteads and properties, and smaller villages connected by the network of minor roads.

In plan form the site is effectively contained by the highways network. However, notwithstanding this physical separation, the landform is such that these barriers are breached in terms of the perception of landscape character and views and parts of the central, northern and eastern areas of the study area retain a strong relationship with the wider landscape (Plate 4).

Landscape and Visual Analysis

The study area includes a number of physical landscape constraints that should be retained and enhanced wherever possible.

This includes more obvious components, such as the ancient woodland and rights of way connections/corridors, but also extends to some more subtle aspects of the landscape such as the smaller-scale estate-like field patterns and some specific view corridors.

In terms of landscape character, the landform creates a distinctive ridgeline that runs broadly from north to south across the central area of the study area, resulting in a distinction in the landscape between the area to the west of the ridge (associated with the A38 corridor) and to the east of the ridge (associated with the M5 corridor) and the wider ridges and valleys landscape. Across these two generally distinct areas, vegetation cover adds further variation across the study area, with the southern parts being more enclosed by tree and woodland cover whilst the central and northern areas can be sub-divided into the more open arable landscapes, and the smaller scale pastures.

There are two elements of the landform and topography of the study area that influence considerations of sensitivity and capacity.

The character of the ridgeline

The ridge itself forms a feature that is apparent across the study area and from the surrounding landscape; this is consistent with published character guidance and is a distinct feature from a variety of locations in the surrounding landscape context. However, there is also variation across the ridge, with the character of the southern parts relating to the woodland areas and presenting a wooded horizon, whilst the northern parts are more open.

Associations with Landmark Buildings

Aligned to the differences of character across the ridge, are the associations with landmark buildings that form a feature in several views. These include: Tockington Park Farm which sits close to the open section of the ridgeline and is visible from several locations to the east; and also views to the cluster of buildings at Old Church Farmhouse which are situated at a relative high point of the wider study area (at c. +90m AOD), and form an attractive feature in several views from the south and east. These matters are further set out in the Historic Environment section of this Statement.

Separate considerations (to that of landform) are the physical and visual separation between the two settlement areas of Woodhouse Down and Rudgeway, and a more strategic gap between the larger villages of Almondsbury and Alveston, and the perception of urban sprawl from Bristol. These matters relate both to landscape character and the experience of visual receptors and includes the experience of those travelling along the A38 but also those using the network of public rights of way in this part of the landscape and some residential locations on the fringes of the settlement. The Green Belt context of the wider area reinforces this matter as a key consideration.

Visual effects from the network of public rights of way across the site are inevitable, however views can be used to shape development parcels and mitigation. There are also views out from the study area that can inform proposals for open space, utilising the 'creation' of new locations to experience views as an opportunity for development.

Notwithstanding the variation in the attributes of the landscape in terms of overall development potential, there remain some more specific opportunities and constraints for the study area as set out overleaf and illustrated in plates 5 & 6.



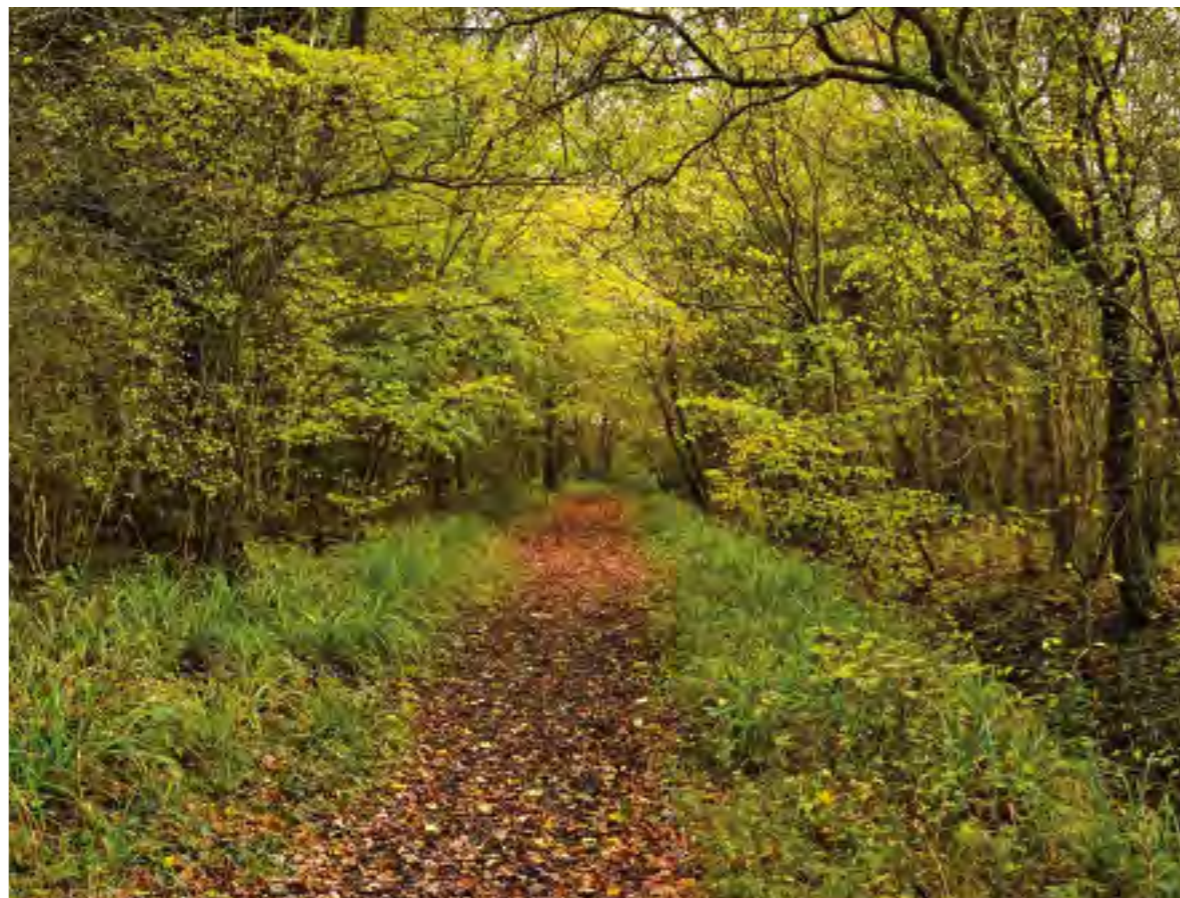
Plate 3: Land north of Hortham Wood looking north from the public footpath with Tockington Park Farm is in the distance.



Plate 4: View from Church Lane across the M5 towards to central and northern parts of the study area.

Opportunities for the study area are considered to be:

- That parts of the study area are relatively well contained and that these areas can accommodate development with limited impact on the landscape – this particularly applies to areas to the south where there is a stronger framework of vegetation and also a stronger context of existing settlement;
- Working with the green infrastructure and public right of way network to retain the vegetation structure and enhance this through new strategic landscaping and connections; and
- The location of the study area within the Forest of Avon which enables potential development to come forward based on principles of green infrastructure and open space which can contribute to the forest overall (which will reflect positively on the quality of the scheme).



PROW through Horthan Wood

Constraints associated with the study area are summarised as follows:

- The distinctive ridgeline that runs through the study area and its relatively more elevated areas of landform, including some of the open side slopes to the east and more exposed crest of the ridgeline in the central and northern sections of the study area;
- The existing framework of vegetation which needs to be retained and enhanced wherever possible as it benefits the capacity of the study area – this is particularly important for the southern parts of the study area and the smaller scale enclosures in the north-western corner of the study area;
- Relatively, the openness of the central and eastern-central and north-eastern parts of the study area and inter-visibility with the wider rural landscape to the east which will need to be addressed in the master planning process through a considered development envelope and strategically placed proposals for green infrastructure and open space;
- Views to and across the study area from the local network of public rights of way, and, the road network, particularly the section of the A38 and public footpaths in the part of the study area that separates Woodhouse Down and Rudgeway;
- Views within and to the study area that experience distinctive landmark buildings; and
- Views from the study area to the surrounding landscape, for example views to the west and the Severn estuary (albeit restricted and partially screened) and views to the open landscape to the east, particularly from the public footpaths that cross the crest of the ridgeline.



Plate 5: Area of Opportunity – Looking south from Tockington Park Wood to Hortham Farm.



Plate 6: Area of Constraint – Looking south towards Tockington Park Wood in the background and Tockington Park Farm in the middle ground. In the far distance are the pylon to the north of Hortham Lane and Housing ant Woodside Avenue.

Development Capacity and Envelope

Based on the preliminary analysis set out above, it is considered that there is landscape capacity within the study area, that can come forward with a considered green infrastructure and landscape strategy.

The approach is selective whereby landscape and visual impacts will occur but are likely to be limited to an acceptable level in terms of the physical and perceived extent of these being localised. Notwithstanding some residual landscape and visual impacts, development can still come forward with an inherent and robust strategy for mitigation that effectively avoids or minimises impacts.

A preliminary landscape-led development strategy is presented overleaf. The components of the approach are considered below:

Southern area

- includes development parcels immediately north of, and connected to, Woodhouse Down, the northern limit being defined by the existing threshold set by Tockington Park Lane and Abbotts Way (and associated built form) – the eastern limits being set by consideration of character and views of the ridgeline and maintaining an appropriate stand-off to these;
- this area includes proposals for green infrastructure and open space that create new opportunities for views of the open landscape of the ridgeline;
- together this creates a distinct and defensible edge to the Green Belt and strengthens physical and visual separation in this context;
- includes larger scale development parcels in the south-eastern part of the southern area, utilising the enclosure of the larger scale woodland areas and proximity/exposure of existing residential estates;
- existing green infrastructure in this south-eastern part of the study area also lends itself to an integrated green infrastructure strategy that works well with defining sub-areas of development which will help mitigate landscape and visual impacts (note that the strategic landscape proposals can also work with required stand-offs to the utilities infrastructure);
- maintain a generous stand off immediately to the east of Tockington Park Wood (utilising this area for green infrastructure and open space) which will push the development envelope down slope and avoid and/or reduce overall visibility from the wider landscape to the east;

Central area

- avoids the central parts of the study area, based on constraints of the gas pipeline, Green Belt separation and the character of the exposed eastern slopes which are visible from the wider landscape to the east;

Northern area

- inclusion of a development parcel to the north-eastern corner of the study area which has some capacity in landscape and visual terms due to the nature of the intensified arable land use, proximity to the M5 motorway corridor (and lack of enclosure to the M5 at this point) and physical containment by the M5 and Church Road (noting that this parcel is likely to be less practicable in isolation in overall planning terms); and
- inclusion of smaller scale development parcels that infill the contained areas of the landscape between the Gloucester Road and Church Road.



Preliminary Landscape Approach



The Green Belt



The study area is wholly within the Bristol and Bath Green Belt.

Three of the Green Belt purposes are discussed below in relation to the study area, these comprise:

- ‘checking the unrestricted sprawl of large built up areas’;
- ‘preventing neighbouring towns from merging into one another’; and
- ‘assisting in safeguarding the countryside from encroachment’.

The ‘setting of historic towns’ purpose is not relevant, and the ‘assistance with urban regeneration’ purpose is a general principle and thus not usefully assessed when making comparisons with other strategic greenfield locations (green belt or non-green belt).

Checking the unrestricted sprawl of large built up areas

The inner boundary of the Green Belt currently follows the alignment of the M4 and M5 motorways as they converge to enclose the urban areas of Aztec West, Patchway and Bradley Stoke. This highway infrastructure forms a strong Green Belt boundary that has prevented the growth of the Bristol area to the north along the A38.

The study area is however separate from the built-up area of Bristol, and thus development here would be characterised as a new community or an expansion of the communities of Hortham, Woodhouse Down and Rudgeway rather than an extension of Bristol. This would not represent the unrestricted sprawl of a large built-up area, but rather the restricted development of a new community/village.

Preventing neighbouring towns from merging into one another

The A38 leads north from Junction 16 through the communities of Upper Almondsbury, Woodhouse Down and Rudgeway, before continuing to the larger village of Alveston and the market town of Thornbury. Development on either side of the A38 is interspersed with open space and agricultural land of varying widths, depths and character. To the west, long-distance views between areas of ribbon development reveal the Severn Valley.

Housing development directly to the east of the A38 and to the north of Tockington Park Lane would increase ribbon development between the city of Bristol and the town Thornbury in an area of more rustic agricultural character, thus increasing the ‘perception’ of merging given the almost unbroken ribbon development between Alveston Hill and Rudgeway. In reality, there would be no merging of Bristol with Thornbury, but nevertheless the additional sensitivity of the central part of the study area is recognised.

Housing south of Tockington Park Lane, if master planned as a new community or neighbourhood, would not have any merging effect whatsoever, whether perceived or real.

The redevelopment of Hortham Hospital for 250 dwellings is an example of a significant housing development that does not have a merging effect. Those unfamiliar with the history of the Hortham Village site would perceive it as sympathetic greenfield development in the green belt with its own character and place identity. There is scope within the Green Belt to continue this type of development to the north of Hortham Lane, whilst limiting the visual effects of strategic housing development and the loss of openness. At the same time, this would create a critical mass to enable new community uses, such a primary school to increase the sustainability of the areas of settlement that already exist.

Development immediately to the north of Tockington Park Wood and Tockington Park Lane along the A38 would give the impression of linear sprawl from Bristol and is not being promoted. A further pulse of development around Church Zone has longer term potential.

‘Assisting in safeguarding the countryside from encroachment’

Any green field development will encroach on the countryside, but the West of England’s housing needs cannot be met without encroachment.

National Green Belt policy does not distinguish between higher and lower areas of countryside value. Nevertheless, as evidenced in the landscape section of this statement, it is clear that the encroachment effects at Tockington Park can be contained and mitigated to a much greater degree than, for example, strategic locations at Whitchurch, BANES (Green Belt) or at Buckover (non-Green Belt).

Conclusion

There are exceptional circumstances for removing land from the Green Belt and Tockington Park offers a highly sustainable location, where the effects on openness can be contained.



Green Belt between the A38 and Gratten's Break viewed from the A38 looking towards Rudgeway.

Built Heritage



Designated heritage assets and built heritage assets in the study area the immediate wider area.

The study area contains six designated heritage assets, comprising Grade II Listed Buildings. A Scheduled Monument which, is also Grade II Listed, is located immediately outside the study area to the north.

Church Farmhouse

The Grade II Listed Church Farmhouse (NHLE ref. 1321099) is located in the northern part of the study area. It comprises a late 16th-century farmhouse, now a hotel. Its primary setting comprises the non-designated Locally Important Park and Garden in which it is located (Old Church Farm, Alveston, HER ref. 11066).

Ruins of St. Helen's Church/Old Church of St. Helen

The Scheduled and Grade II Listed Ruins of St. Helen's Church/Old Church of St. Helen are located immediately outside the study area (NHLE ref. 1007011 and 1128878) adjacent to Church Farmhouse and are also located within the Locally Important Park and Garden, which forms a key element of their setting. St. Helen's comprises the below-ground archaeological remains and ruins of a medieval church, of which the tower and portions of some walls remain standing.

Some of the land within the northernmost part of the study area will likely contribute to the significance of these assets through setting, to varying degrees, although to a lesser degree than their immediate setting described above. Therefore, whilst the assets represent a constraint to development in part of this site, this is largely confined to the northern part of the study area due to the rising ridgeline topography to the south, vegetation in field boundaries and plantations.

Pypers

In the north-western part of the study area is the Grade II Listed Pypers (1128876) an 18th-century country house in close proximity to the associated Grade II Listed Stables, attached walls and piers about 50 metres to west of Pypers (1128877) and Grade II Listed entrance gates, piers and wall about 10 metres to north of Pypers.

(1321098). The Listed Buildings are located within gardens and grounds which appear from an initial review to be approximately 4ha in area, and are enclosed to the north and west by a boundary wall which may be Curtilage Listed. These grounds are not a Locally Important Park and Garden they do comprise a non-designated heritage asset. These grounds appear to form the key element of the setting of the designated assets that contribute to their setting, and the setting of these assets is considered to be a constraint to this defined area. However, the setting of these assets is not considered to be a major constraint to development within the remainder of the site, views of which are constrained by the rising ridgeline topography to the south, vegetation in field boundaries, plantations and built form at Rudgeway Park.

Tockington Park Farmhouse

The Grade II Listed Tockington Park Farmhouse is located in the centre of the study area (NHLE ref. 1321064). It comprises a 17th-century farmhouse, with its primary setting comprising a farmyard with a number of potentially Curtilage Listed ancillary buildings and barns.

The setting of the building extends beyond the farmyard, and includes farmland within the study area with which it would have had a historic functional association and with which it has some intervisibility. However, it is anticipated that with a sensitive masterplan informed by a detailed assessment of significance and setting with an appropriate offset, residential development could be accommodated within the study area without causing harm to the heritage asset.

Tockington Conservation Area

Tockington Conservation Area is located c. 1km north-west of the study area. The Conservation Area has been designated to encompass the village of Tockington, which developed around Tockington Green. As the study area is located on a ridgeline to the east of the asset, the land within the study area which is set back from the edge of the ridge is not likely to form part of the setting of the asset. Development would be sensitively designed to ensure that it would not be visible over this ridgeline. The western area of the site will require particular consideration in this regard. Overall, this asset is unlikely to represent a constraint to development across the vast majority of the study area.

The Archaeological Resource

An initial assessment of the archaeological resource of the study area has been made through reference to the online version of the South Gloucestershire Historic Environment Record). It should be noted that this data is indicative only.

Tockington Roman Villa and other Roman Remains

A Roman villa is located at Tockington Park Farm in the centre of the study area (1472). An archaeological excavation in the 1880s revealed that the villa measured 73m north/south by 49m east-west. 32 rooms were uncovered, some extending under the existing farm buildings. A bath house was located beside a spring to the east of the villa. Geophysical survey was undertaken to the north and south of Tockington Park Farm in 1997 during planning of the route of the Seabank to Pucklechurch Pipeline, followed by archaeological excavation of the southern area. The results showed linear anomalies suggestive of Romano-British field systems or settlement (13482) to the north of Tockington Park Farm, and a ditch-enclosed Roman cemetery (12742) to the south. The cemetery was 60m wide, although its northern and southern extents were not established. A number of Roman-period potsherds were found in the cemetery ditches.

The remains of the Roman villa represent a constraint to development. However, as these are located beneath Tockington Park Farm and the Grade II Listed farmhouse, a set-back would serve the dual purpose of preserving the archaeology and the setting of the building. The level of constraint presented by the possible Roman settlement to the north of Tockington Park Farm is currently unknown, although it is likely to represent less of a constraint in archaeological terms than the Roman villa. Further investigation, such as wider geophysical survey, should clarify this and any areas where the exclusion of development is necessary to be identified.

The area of the Roman cemetery is likely to represent a localised constraint. However, it should be noted that the construction of a pipeline was permitted across the cemetery so some degree of disturbance has already taken place. However, excavation and publication of this area would be costly and time-consuming and it would be highly desirable to accommodate these remains in situ within the development.

Other Historic Environment Records (HER)

Archaeological investigations at Hortham Hospital immediately south-west of the study area identified late Iron Age and Romano-British settlement (1519). Although located outside the study area, this is further evidence of the extensive Roman-period occupation of the ridgeline area on which it is located. There is potential that these remains could extend into the southern part of the study area, although they should not represent a constraint to development which would require preservation in situ.

The HER records “unusual” cropmarks to the north and west of Ashfield Farm (8157), which is located c. 250m east of the study area. The limits of this activity are not currently defined, and it is possible that it extends into the study area.

The site of WW2 heavy anti-aircraft battery is recorded in the north-eastern part of the study area HER ref. 4389). If the location information provided online is correct, it would appear as though this feature does not survive above ground.

The HER records that a medieval deer park was located at Tockington, and that sections of the park pale still (the enclosing ditch) survive (HER ref. 3361). It is unclear how big the deer park was, where these surviving sections of park pale are located and whether they are situated within the study area.

A post-medieval chapel recorded at Tockington is plotted by the HER in the centre of the study area (20037). However, the actual location is unknown and it may be located outside the study area. This record is not considered to represent a constraint to development.

A Roman road is recorded in the vicinity of the study area (17598). The road may have passed through the study area, or it may have been on the alignment of the A38 immediately to the west. Another record of a Roman road is plotted in the eastern part of the study area (1478), the description of which states that a site visit in 1982 and a trial excavation to locate the road failed to find any evidence of it (although the exact location of these investigations is unclear at this level of assessment).

A number of other historic environment features are recorded within the study area, including the site of a lime kiln, post-medieval trackways, and former quarry pits. None of these records are likely to present a constraint to development.

Conclusions

The study area contains six Grade II Listed Buildings. Whilst the settings of these are likely to represent localised constraints in the north-western and central area of the study area, with a suitable offset and a sensitive masterplan significant harm to these assets could be avoided.

On current evidence, archaeological remains present localised constraints to development within the centre of the study area at Tockington Park Farm. The remains of the Roman villa and cemetery are likely to require preservation in situ. However, as these appear to be located beneath and in close proximity to the Grade II Listed Tockington Park Farmhouse this should not entail a large additional reduction in the developable area.

The majority of the study area as a whole is not likely to contain further archaeological constraints which would impact on masterplanning, on current preliminary evidence.



Heritage Plan

DESIGNATED HERITAGES ASSETS:-

- 1 TOCKINOTON PARK FARM
- 2 CHURCH FARM HOUSE
- 3 RUINS OF ST HELENS CHURCH/
OLD CHURCH OF ST. HELEN
- 4 PYPERS COUNTRY HOUSE
- 5 PYPERS STABLES, WALLS & PIERS
- 6 PYPERS ENTRANCE GATES

ARCHAEOLOGY:

- 1 ROMAN VILLA
- 2 LINEAR ANOMALIES SUGGESTIVE OF ROMAN-
BRITISH FIELD SYSTEMS / SETTLEMENT
- 3 DITCH ENCLOSED ROMAN CEMETERY
- 4 ROMAN ROAD
- 5 ROMAN ROAD
- 6 POST-MEDIEVAL CHAPEL
- INDICATIVE AREAS OF HERITAGE
SENSITIVITY INCLUDING SETTING

NOTES:-

FEATURES MAY NOT BE ACCURATELY PLOTTED



Tockington Park Farm – looking north.



Tockington Conservation Area.



Church Farm House & Ruins of St. Helen's Church/Old Church of St. Helen – looking north west.



Biodiversity, Flood Risk and Drainage



Biodiversity

The Landscape Character Assessment notes that The Rudgeway and Tytherington Ridge's mosaic of grassland, woodland and farmland with the Hortham Brook and its tributaries to the south and hedgerows providing connectivity, comprise important habitat for a diverse range of species.

Within the study area parts of Tockington Park Wood (9.63ha) and Hortham Wood (7.9ha) are designated as ancient woodland. These woodlands are also designated as priority deciduous woodland habits and are Sites Of Nature Conservation Importance. Gratten's Brake and two smaller areas of woodland are identified as priority habits but not as SNCI.

Natural England updated its standing advice in respect of ancient woodland in November 2017. This requires:

- a 15m buffer bar root protection; and
- a 50m buffer to mitigate the effects of trampling and pollution;

These new distances are accounted for in the emerging masterplan.

The Landscape Character Assessment notes that key species likely to be associated with the broadleaved woodland include bats and dormice, both of which are present across the District and are UK priority species with associated Biodiversity Action Plans (BAP).

As there are few watercourses within the Rudgeway and Tytherington Ridge area, species within these habitats are likely to be sensitive to any changes impacting upon the water body and this could include water voles.

The majority of the agricultural land use within the study area is pastoral farmland with areas of arable to the south and north. Arable farmland provides ground nesting and the winter stubble provides foraging opportunities for farmland birds including some listed as being Globally Threatened Red list species.

Subject to detailed ecological survey and mitigations it is not considered that biodiversity will be significantly impacted.

Flood Risk and Drainage

The study area is largely free from fluvial sources of flood risk aside from a small area associated with Hortham Brook in the south east. This area would in any case be unsuitable for housing development due to noise from the M5.

Surface land drainage is minimal, with a few drainage ditches along field boundaries feeding the Hortham Brook. The Environmental Agency's surface water flood risk maps indicate natural drainage channels and some areas of ponding that can be accommodated as part of the sustainable urban drainage network.

Flood risk and drainage are not impediments to the suitability of the study area as a whole, but on-site features have been identified that provide the context for the detailed design stage.



Ecology Plan



Utilities

Electricity Transmission Lines

The southern part of the study area is bisected by a 440kv National Grid transmission lines that run between Hortham Farm and Hortham Wood. It is assumed that this will remain in situ as is National Grid’s default policy.

The transmission line presents a master planning constraint for the fields to the north of Hortham Lane and will need to be suitably buffered in respect of the safety and amenity of future residents.

National Grid has developed ‘A Sense of Place’, which gives advice on the design large-scale developments that are crossed by, or close to, overhead lines. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development’s visual and environmental impact.

Developments such as Fairford Leys to the south of Aylesbury demonstrate how pylons and transmission lines can be successfully accommodated within an urban design strategy. This has also been the case at North Yate, Brimsham Park, within South Gloucestershire.

High Pressure Gas Pipelines

Two high pressure gas pipelines traverse the centre of the study area between Tockington Park Wood and Tockington Park Farm and are registered with the Health and Safety Executive (HSE) as Major Accident Hazard Pipelines.

The Health and Safety Executive is a statutory consultee on certain developments in the vicinity of major hazard sites and major hazard pipelines. Each pipeline is subject to three ‘consultation zones’.

NTS (Pucklechurch) to Seabank PS Pipeline	
HSE Ref:	11902
Transco Ref:	N/A
Operator:	Seabank Power Ltd
Inner Zone:	96 metres
Middle Zone:	190 metres
Outer Zone:	335 metres

14 Feeder Pucklechurch/Seabank	
HSE Ref:	4135954
Transco Ref:	1499
Operator:	National Grid Gas Plc
Inner Zone:	40 metres
Middle Zone:	140 metres
Outer Zone:	155 metres

The width of the consultation zones is determined by an assessment of the ‘risk’ and the ‘hazard’ pertaining to it, i.e. the likelihood of an accident and its consequences.

The consultation zone in which development is located and the ‘sensitivity level’ of the proposed type of development normally determines the HSE’s planning advice. This advice generally falls into two categories ‘Advise Against’ or ‘Don’t Advise Against’. Strategic levels of housing development are advised against to the outer edge of the Middle Zone and schools and more vulnerable uses are advised against up to the edge of the Outer Zone.

The HSE’s land use planning advice is based on an assessment of the risks from the pipeline as currently notified to HSE. Where the pipeline is proposed to be modified prior to the occupation of the development, then the HSE will reassess the risks from the pipeline, relative to the proposed development based on the following modification details: pipeline diameter; wall thickness; grade of steel; depth of cover over pipeline; and start and finish points of thick-walled sections.

It is clear from several projects around the country that when a high pressure pipeline is to be upgraded, the inner and middle consultation zones have reduced substantially to around 10 metres, for example Didcot North East in South Oxfordshire.

Detailed investigations are underway, but in principle it will be viable to divert and/or upgrade the pipelines to release development land, with the land value benefits outperforming the cost of the works. This strategy, given other environmental constraints, is a particular focus for the northern third of the fields between Tockington Park Wood and the M5.



Gas Buffer Plan

Sustainability, Access and Movement



The study area, particularly to the south, is sustainably located to take advantage of the proximity of services, facilities and major centres of employment in the North Bristol fringe.

The strategic concept plan overleaf plan overleaf identifies a 5km cycling zone that captures: Aztec West Business Park; other strategic employment areas; and the retail and leisure facilities of the North fringe.

These locations are also well connected by existing public transport services, which are proposed for enhancement, not least via the extension of the MetroBus concept to Thornbury. The Aztec West roundabout currently functions as an interchange between conventional services (77,78,79) and the Cribbs Causeway to Hengrove Park Metrobus Route. This gives onward access to the University of the West of England and surrounding employment clusters.

Due to the additional proximity of these areas compared to the proposed SDL's at Buckover and Charfield the residents at Woodhouse Down Garden Community will be much more likely to travel to work by bike or bus as the overall journey times are more acceptable.

Access Points

Primary access to the proposed southern development area will be from Hortham Lane and the A38. Potential access options for Hortham Lane have been considered and will comprise a simple priority junction into the study area, where the current access to Hortham Farm is located. Options for the A38 access are being considered to the north of the BP Petrol Station and would involve a priority junction or signals.

Existing Public Transport Services

The closest existing bus stops are located on Elderberry Way, within Hortham Village to the south of the study area and on the A38 to the west of the study area.

Stagecoach's 77 Service serves Hortham Village and offers an hourly service between Thornbury and Bristol, providing great connections to Aztec West, Abbey Wood, Bristol Parkway station and Southmead Hospital.

First Group's 78/79 services offers a 30-minute service between Bristol and Thornbury, with the 79 diverting to Cribbs Causeway en-route to the centre of Bristol.

Proposed Public Transport Services

It is considered that a bus loop could be provided within the development, connecting the A38 to Hortham Lane in the south and Woodside Avenue to the west.

Exact route and timetabling options can be considered in due course in collaboration with SGC, First Group and Stagecoach. Bus corridor improvements will be provided off-site on the A38 as part of the proposed Metrobus scheme to encourage attractive connections between the study area and major employment areas centres. The West of Joint Transport Study (October 2017) presents a long-term Transport Vision, to address committed and future growth. This will be translated in the Joint Transport Plan for consultation in Summer 2018. The current study includes reference to a new Park and Ride to the A38 to the north of Almondsbury. Woodhouse Down Garden Community could host this facility.

Walking and Cycling Network Strategy

Footways are provided on both sides of Hortham Lane from the A38 to the Hortham Village scheme but no footways are currently provided along the site frontage. This can easily be rectified.

A footway is provided on the northern side of Woodhouse Avenue for the majority of its length.

Existing local cycle routes in North Bristol are extensive, with a local traffic-free route on the A38 from Hollow Road towards Bristol. There is the potential to extend the cycle route along the A38, as set out in the Joint Transport Study, to connect to Land at East Almondsbury.

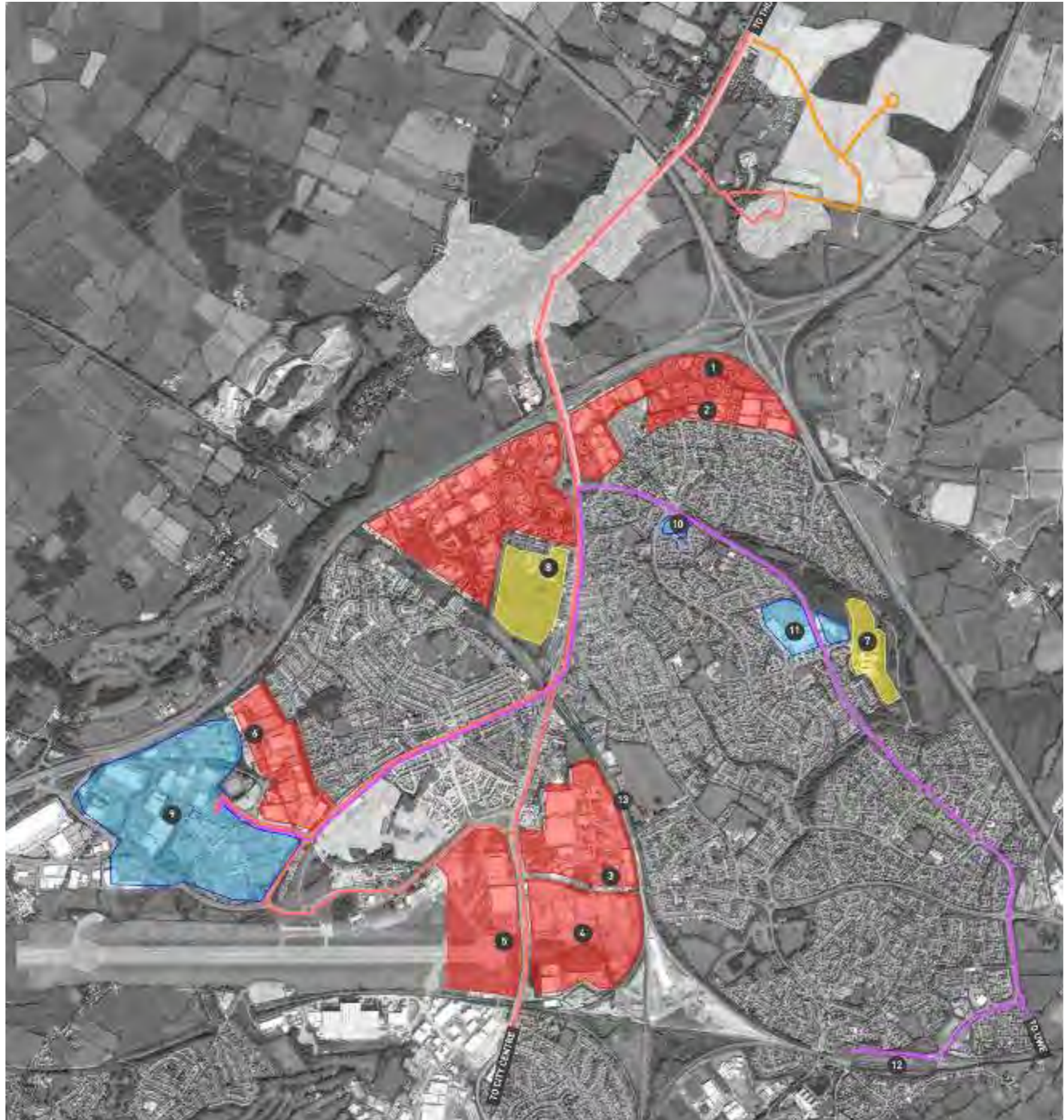
A comprehensive cycling network would be provided within the proposed development area that would link with existing and proposed routes. Connection into these existing routes will provide viable cycle routes to Almondsbury, Thornbury, Bristol, and the surrounding areas.

The final masterplan for the development would be designed with movement of pedestrians and cyclists as a priority, ahead of the movement of vehicles. A number of shared spaces and quiet streets will be provided, without segregated spaces for pedestrians, cyclists and vehicles. These streets will be designed to constrain vehicular speeds and therefore to provide a safe environment for pedestrians and cyclists.

Off-Site Mitigation Strategy

A number of junctions will require mitigation measures e.g. Hortham Lane with the A38. It is the intention of the site promoter to work collaboratively with the stakeholders to appropriately address the various issues.

The development of Woodhouse Down Garden Community would not require a new road or a new or significantly modified motorway junction, as is the case with Buckover, NE Keynsham, Banwell, Churchill and Whitchurch. The key infrastructure is already in place to enable the early delivery of the new community.



Areas and Bus Routes Plan

- KEY:**
- EMPLOYMENT:** [Red square]
- 1 AZTEC WEST BUSINESS PARK
 - 2 WOODLANDS LANE BUSINESS PARK
 - 3 ROLLS ROYCE
 - 4 NORTH BRISTOL BUSINESS PARK
 - 5 FULTON AIRFIELD EMPLOYMENT LAND
 - 6 BRITANNIA ROAD
- SECONDARY SCHOOLS:** [Yellow square]
- 7 BRADLEY STAKE COMMUNITY SCHOOL
 - 8 BRADLEY STAKE COMMUNITY SCHOOL
- RETAIL/LEISURE:** [Blue square]
- 9 CRIBBS CAUSEWAY
 - 10 ALDI
 - 11 WILLOW BROOK CENTRE
- RAIL:** [Grey square]
- 12 BRISTOL PARKWAY STATION
 - 13 PATCHWAY STATION
- KEY BUS ROUTES:**
- [Red line] SERVICES 77, 78, 29
 - [Purple line] METROBUS NORTH FRINGE TO HENDROVE
 - [Pink line] PROPOSED METROBUS THORNBURY EXTENSION
 - [Orange line] DIVERSION THROUGH SITE

Conclusions



This Vision document has set out a set of strategies and principles for the creation of a new garden community focussed to the north of Almondsbury.

The Vision focuses on the area of Woodhouse Down and Hortham village to promote a new mixed-use settlement of around 2,000 homes, with supporting social infrastructure.

The location of this area is second to none in respect of access employment concentrations by non-car modes of travel. None of the currently proposed strategic development locations, or contingency locations can claim the same sustainable credentials as Woodhouse Down Garden Community.

The study area, particularly to the south, is sustainably located to take advantage of the proximity of services, facilities and major centres of employment in the North Bristol fringe. Land to the north is being promoted as a second phase of development or if greater numbers are required in the plan period this could come forward alongside phase 1.

The wide array of employment, retail and leisure facilities of the North Fringe are accessible with a 5km cycle ride and the location is very well connected to these concentrations via existing and proposed bus networks.

Woodhouse Down Garden Community is location that can be delivered without any 'big ticket' pre-requisite infrastructure costs e.g. a new road or a new motorway junction. Consequently, land value uplift can be diverted to matters such as 'smart energy' solutions as well as sustainable transport and cycling infrastructure.

Woodhouse Down Garden Community is presented as a more sustainable alternative to the proposed new settlement at Buckover, some distance to the north beyond Thornbury, as a more sustainable and deliverable location than the proposed contingency location to the south of Chipping Sodbury and as the premier location to direct the need for any uplift in the housing require of the West of Joint Spatial Plan.

Exceptional circumstances have been presented by South Gloucestershire Council for the removal of land from the Green Belt. The Green Belt assessment in this Vision document demonstrates that a planned and restricted development at Woodhouse Down Garden Community would not equate to the unrestricted sprawl of a large urban area (Bristol); would not result in the merging of Bristol with Thornbury; and would maintain a green gap along the A38 between the settlements of Almondsbury, Rudgey and Alveston.

Some countryside incursion would be required to realise the vision but this is true of Buckover and Chipping Sodbury and all the proposed strategic development locations in the West of England. Housing needs cannot be met without countryside incursion. The contained nature of Tockington Garden Community on land of less landscape value will mitigate the impact on the countryside to a greater degree than elsewhere in the West of England. Set against the exceptional sustainability locations of the proposed site, the case for identifying it as an alternative or additional new garden community in the Plan compelling.



First Floor,
South Wing,
Equinox North,
Great Park Road,
Almondsbury,
Bristol,
BS32 4QL

www.pegasusgroup.co.uk
T 01454 625 945

APPENDIX 2

THICKETMEAD, MIDSOMER NORTON, REVISED LAYOUT

NOTES
 This drawing is the copyright of Thrive Architects Ltd ©. All rights reserved.
 Ordnance Survey Data © Crown Copyright. All rights reserved.
 Licence No. 100007359. DO NOT scale from this drawing.
 Contractors, Sub-contractors and suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.
 Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

30 Units
 30% Affordable
 Gross site area: 3.06Ha
 DPH: 24

REV	DESCRIPTION	DATE	AUTHOR	CHK'D





thrive.
architects

Portsmouth Office
 Unit 5, Middle Bridge Business Park, Bristol Road, Portsmouth, BS20 6PN
 T: 01275 407000 F: 01794 367276 www.thrivearchitects.co.uk

PROJECT
 Thicket Mead, Radstock

For: Edward Ware Homes

DRAWING
 Schematic Layout

SCALE	DATE	AUTHOR	CHK'D
1:500 @ A1	13/12/17	TW	-

JOB NO.	DRAWING NO.	REV
EDWA171117	SCL.01	-

APPENDIX 3

NORTHMEAD ROAD, MIDSOMER NORTON, REVISED LAYOUT



NOTES
 Permission is granted to scale from this drawing for the purpose of Local Authority Planning Approval only. In all other circumstances DO NOT scale from this drawing. please contact the office for any additional information required.
 Contractors, Sub-Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any site drawings or building work. Any discrepancies should be recorded to the architect.
 Where applicable this drawing is to be read in conjunction with the Consultant's drawings. This drawing is the copyright of Thrive Architects Ltd. All rights reserved.
 Ordnance Survey Data © Crown Copyright. All rights reserved. Licence No. 100007205

REV	DESCRIPTION	DATE	AUTHOR	CHK'D
A	Layout revised to accommodate existing sewer	02/01/18	TW	-

23 Units
 30% Affordable
 Gross site area: 1.24Ha
 DPH: 20



Partishead Office
 Unit 5, Middle Bridge Business Park, Bristol Road, Partishead, BS20 6PH
 T: 01275 407000 F: 011794 367276 www.thrivearchitects.co.uk

PROJECT
 Northmead Road
 Norton Radstock
 For: Edward Ware Homes

DRAWING
 Schematic Layout

SCALE	DATE	AUTHOR	CHK'D
1:500 @ A2	13/12/17	TW	-
JOB NO.	DRAWING NO.	REV	
EDWA171118	SCL.01	A	

APPENDIX 4

BOXBURY HILL, MIDSOMER NORTON, REVISED LAYOUT

NOTES
 Permission is granted to scale from this drawing for the purpose of Local Authority Planning Approval only. In all other circumstances DO NOT scale from this drawing, please contact the office for any additional information required.
 Contractors, Sub-Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any site drawings or building work. Any discrepancies should be recorded to the architect.
 Where applicable this drawing is to be read in conjunction with the Consultant's drawings. This drawing is the copyright of Thrive Architects Ltd. All rights reserved.
 Ordnance Survey Data © Crown Copyright. All rights reserved. Licence No. 100007226

REV	DESCRIPTION	DATE	AUTHOR	CHK'D
-----	-------------	------	--------	-------



Partishead Office
 Unit 5, Middle Bridge Business Park, Bristol Road, Partishead, BS20 6PH
 T: 01275 407000 F: 01794 367276 www.thrivearchitects.co.uk

PROJECT
Boxbury Hill
 Midsomer Norton
 For: Edward Ware Homes

DRAWING
Schematic Layout

SCALE	DATE	AUTHOR	CHK'D
1:1000 @ A2	04/01/18	TW	-
JOB NO.	DRAWING NO.	REV	
EDWA180103	SCL.01	-	

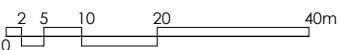
APPENDIX 5

ABBOTS FARM CLOSE, PAULTON, LAYOUT



REV
Amendments

Date



Job No/Drawing No Job Title
13000/3200 C **Land Off Abbotts Close, Paulton**

Scale Date Drawn Drawing Title
 1:1000 05 MNR Framework Plan
 @A4 2013 DA

All Dimensions to be checked on site

pad Design Ltd - The Tobacco Factory - Raleigh Road - Bristol BS3 1TF - Tel. 0117 9530059 - www.pad-design.com



APPENDIX 6

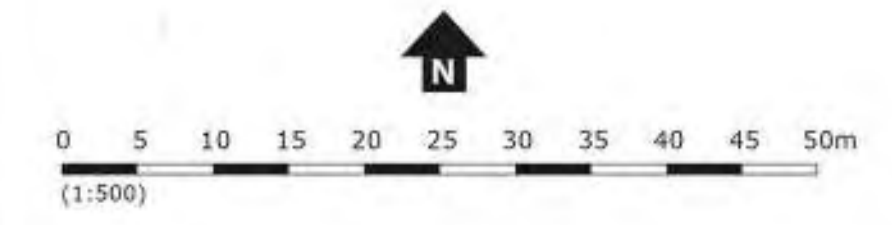
WELLS ROAD, HIGH LITTLETON, LAYOUT



NOTES
 This drawing is the copyright of Thrive Architects Ltd ©. All rights reserved.
 Ordnance Survey Data © Crown Copyright. All rights reserved.
 Licence No. 100007359. DO NOT scale from this drawing.
 Contractors, Sub-contractors and suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.
 Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

REV	DESCRIPTION	DATE	AUTHOR	CHK'D

- 1 / 2 Form entry school
- Existing PRoW diversion
- Structural / transitional tree planting





thrive.
architects

Partishead Office
 Unit 5, Middle Bridge Business Park, Bristol Road, Partishead, BS20 6PN
 T:01275 407000 F:01794 367276 www.thrivearchitects.co.uk

PROJECT
 Wells Road, High Littleton

For: Edward Ware Homes

DRAWING
 Schematic Layout

SCALE	DATE	AUTHOR	CHK'D
1:500 @ A1	04/01/18	TW	-

JOB NO.	DRAWING NO.	REV
EDWA171119	SCL.01	-

APPENDIX 7

CAPPARDS ROAD, BISHOP SUTTON, LAYOUT

-----Original Message-----

From: Englishcombe Clerk [mailto:clerk.englishcombe@googlemail.com]

Sent: 02 January 2018 08:00

To: Local Plan

Subject: Local Plan 2016-2036 Issues & Options document Consultation Response

Please find below Englishcombe Parish Council's response to the Local Plan 2016-2036 Issues & Options document consultation. Note the parish council only wishes to comment against Question 3 in the section Spatial Strategy Options.

Englishcombe Parish Council would prefer Option 1 i.e. continue the existing hierarchical approach to non-strategic development so long as it doesn't result in increased rat running through the parishes that sit alongside key commuter routes into Bath e.g. the A367 from the Somer Valley area. This preference for Option 1 is because the parish council believes this is the most sustainable option.

--

Regards

Kathryn Manchee

Clerk and RFO

Englishcombe Parish Council

3 Lark Close

Midsomer Norton

Radstock

BA3 4PX

Tel: 01761 411305