

**Consultation on the B&NES Local Plan
Issues & Options Document (Phase 1a)
22 November 2017 - 10 January 2018**

**COMMENTS
FORM**

You are invited to comment on the Issues & Options document.

You are strongly encouraged to make your comments on-line via the Local Plan consultation portal www.bathnes.gov.uk/localplan

However, if you are using this form, please complete the form by filling in Part 1 with your contact details and use Part 2 for your response to the questions in the Issues & Options document. It would be helpful if you could complete a separate form for each question in the document you are responding to.

Please send your completed form(s) using email to local_plan2@bathnes.gov.uk. Alternatively you can post the form to Planning Policy, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

Your comments will be used to inform the next stage of the Local Plan preparation.

Part 1: Contact details			
Email is the Council's preferred method of communication and enables us to contact you quickly and efficiently. Please also provide a postcode with details of your address.			
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Part 2:

Which question in the Issues & Options document are you commenting on? Q1, Q3

Questions relating to the options and paragraphs have been numbered in the document for you to refer to in your response.

2.2 Please make your comments as succinct as possible.

PlanningSphere act on behalf of, Redcliffe Homes who have an option on land at Englishcombe Lane, Bath. We are instructed to comment on the Council's current round of consultation on its Issues and Options Local Plan Document.

Vision Section of Local Plan Document

Q1 - Have we identified the critical issues facing the District over the next 20 years?

We note that the Issues and Options document intends to allocate strategic sites at locations identified in the Joint Spatial Plan (JSP) and that in addition, other development opportunities will be identified and allocated building on those already identified in the Place Making Plan. The preparation of the Core Strategy Review and the JSP will therefore take place in parallel. Given that the Review is at a relatively early stage, involvement at this time is clearly crucial in helping to influence and shape this review, hence our comments set out below.

Paragraph 3.01 of the Issues and Options document is welcomed in that it notes that the new Local Plan has a key role in establishing how the 'non-strategic growth' of around 700 new dwellings will be delivered and that this figure is in addition to the existing Core Strategy growth requirement and effective from 2016 (the start of the new Local Plan period).

Given the ongoing pressing need for the identification of land for housing within Bath and North East Somerset, we highlight the importance of including and allocating additional non-strategic sites as part of the Core Strategy Review process to ensure that the combined Local Plan has identified a sufficient supply of housing sites to meet housing need in the new Local Plan period 2016-2036.

The identification and allocation of smaller, non-strategic sites, would also meet the aspirations set out in the Housing White Paper for diversifying the housing market and enabling faster delivery of sites. The Housing White Paper provides an analysis of housing delivery issues, and sets out a direction of travel in terms of government policy to enhance the diversity of supply. The three solutions advocated in the Housing White Paper, p14-15, are: (1) plan for the right homes in the right places; (2) build more homes faster; and (3) to diversify the housing market. Key to increasing housing delivery through diversifying the housing market is the role of SME builders and the supply of suitable sites for this part of the construction sector. In particular, paragraph 1.29 states:

"Policies in plans should allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector. Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive."

Furthermore, small sites are often considerably less constrained than larger sites and are by their nature more attractive to SME builders who do not want lag times between site purchase and delivery, which would further support the aspirations of the Housing White Paper in terms of the need to accelerate delivery to boost the supply of housing.

The Core Strategy Review process therefore needs to ensure that a variety of sites are identified as part of the District's housing supply.

Spatial Strategy Section

Through Urban Intensification in Bath. However, the new Local Plan has a key role in establishing how the 'non-strategic growth' of around 700 new dwellings will be delivered.

Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?

We consider that *Option 1: Continue the hierarchical approach* is the most likely to option to meet the high level of housing need in the District, provide a sustainable pattern of development, particularly with respect to access to public transport and services, whilst retaining the character and vitality of rural communities. However, the wording of any policy approach should make it clear that as well as recognising opportunities in sustainable settlements like Keynsham, further opportunities within the Bath area are also available and these are likely to be highly sustainable sites especially in terms of access to services, employment and transport. These sites should be included as part the non-strategic allocations and would allow additional flexibility in terms of helping to assist faster delivery, as they would not have the long lead in and build out times of larger sites and would also diversify the housing land market, as they would be attractive to access by SME builders.

Whilst there is a focus on the development of large brownfield sites in Bath, such as Western Riverside and Fox Hill, these are challenging sites with significant infrastructure and viability issues which are currently being built out by large house builders. Such sites by their nature would have a considerable lead time and a long build out. There would also be very limited opportunities for SME developers to access such large sites with high up front costs. There are a number of smaller sites available in Bath but these are often highly constrained brownfield sites which are difficult to develop due to viability and heritage concerns. In order to maintain a pipeline of delivery in Bath, in line with the aspirations of the Housing White Paper, we consider that the allocation of smaller non-strategic sites is necessary particular where these sites have limited constraints.

Our client's site, is located immediately adjacent to an existing housing allocation to the south of 89 -123 Englishcombe Lane, which is currently allocated for around 40 dwellings. Our clients site to the east of this allocation would be a logical extension, having similar characteristics to the allocated site and contributing to meeting housing need, but also by increasing the variety of plots available to smaller developers. It is also readily available and deliverable now.

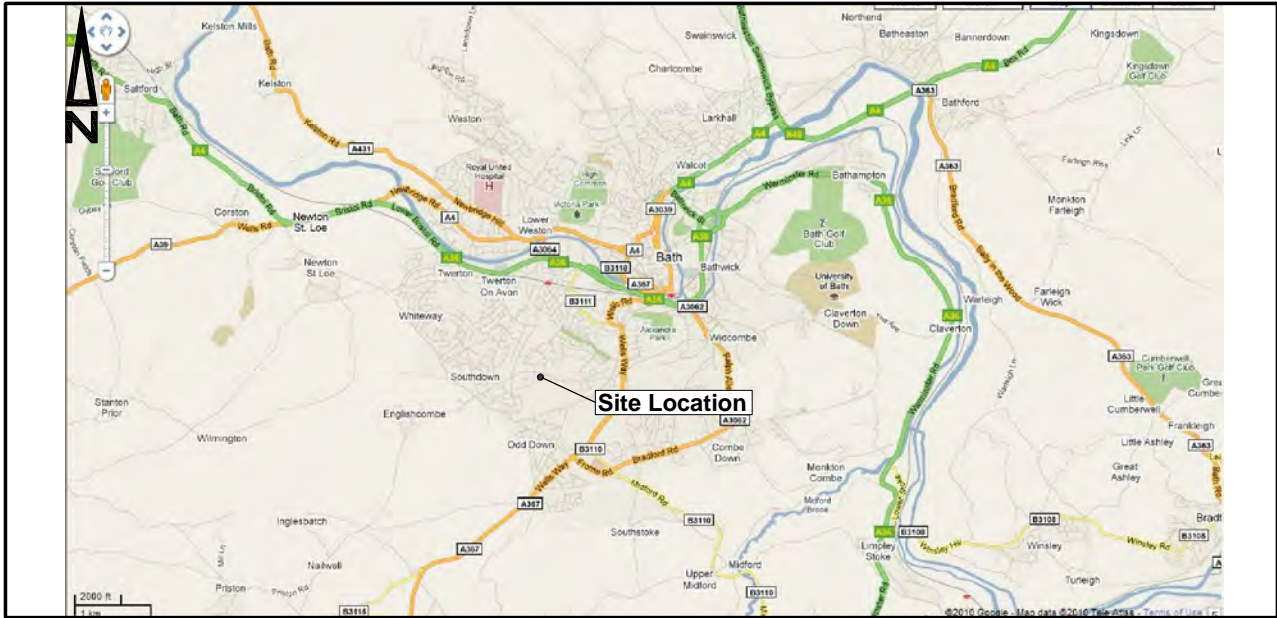
Please expand this box or attach a separate sheet if you require more space.

2.3 Are there any other comments you wish to make on the issues and options?

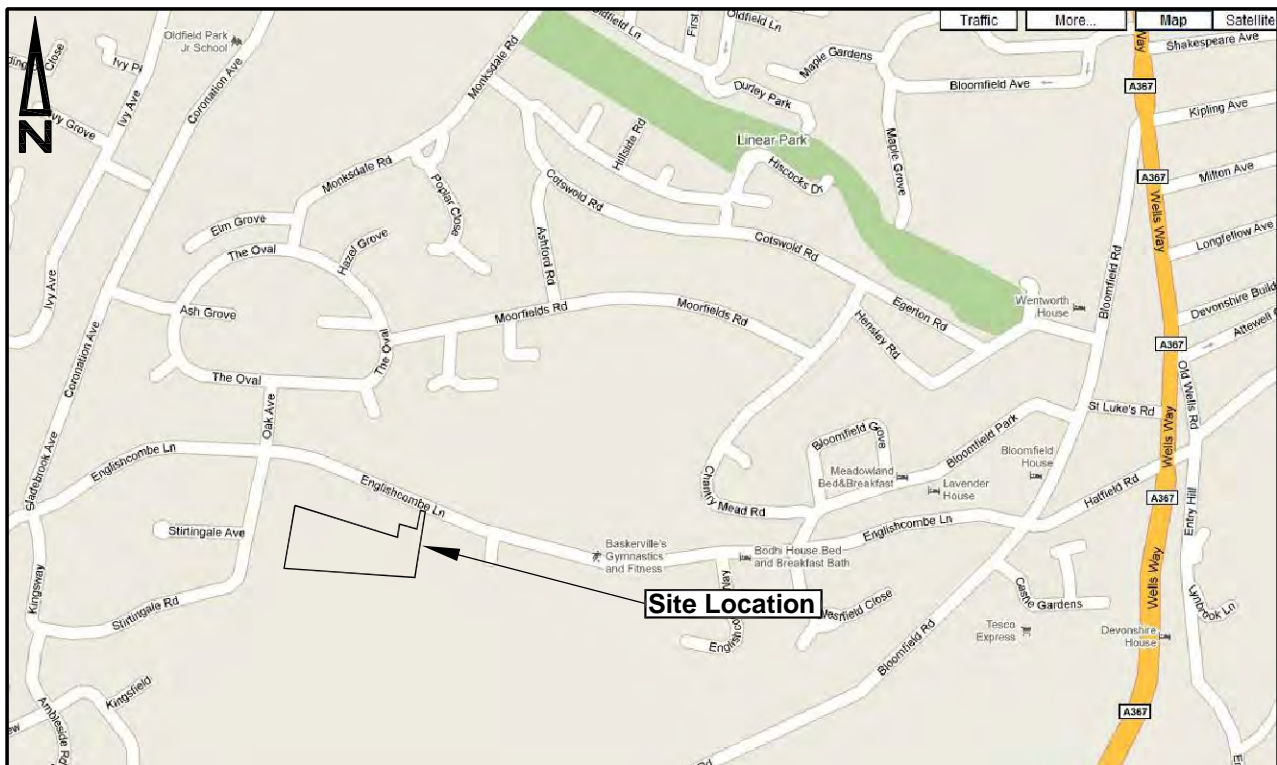
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Please expand this box or attach a separate sheet if you require more space.

See our website for more information and to make your comments on-line:
www.bathnes.gov.uk/localplan



Scale: 1:100,000



Scale: 1:10,000

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9th January 2018

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

Dear Sir/Madam,

Bath & North East Somerset Local Plan 2016-2036
Issues and Options Consultation Winter 2017

Pegasus Group on behalf of Robert Hitchins Ltd have been instructed to submit representations to the above consultation.

The representations comprise a report that responds to the questions within the consultation document and accompanying appendices that illustrate the location of my client's site, Land at Stockwood Lane Whitchurch and a masterplan that responds to the location and context of the site.

If you have any queries, please do not hesitate to contact me.

Yours faithfully,



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BATH & NORTH EAST SOMERSET COUNCIL

LOCAL PLAN 2016 – 2036 ISSUES & OPTIONS CONSULTATION WINTER 2017

ON BEHALF OF: ROBERT HITCHINS LTD

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1. INTRODUCTION

- 1.1.1 Pegasus Group has been instructed by Robert Hitchins Ltd to respond to the Local Plan Review 2016-2036 Consultation.
- 1.1.2 The review of the Core Strategy is welcomed and particularly the opportunity to bring together in one plan the planning policies for Bath and North East Somerset i.e. incorporating a review of the Core Strategy and the Placemaking Plan into one Local Plan.
- 1.1.3 It is noted that this document represents the first phase of the Issues and Options consultation (Phase 1a) and covers four broad areas:
1. Vision & Priorities – outlining the key challenges facing B&NES and the spatial priorities that the Local Plan should address.
 2. Strategy – within the context of the Joint Spatial Plan starting the conversation about possible alternative approaches to providing additional homes over and above those being provided in strategic development locations.
 3. Strategic Development Locations – presenting the emerging proposed approach to development at the strategic development locations at North Keynsham and Whitchurch and raising key questions & issues for discussion.
 4. University issues - as a key element of housing need initial consideration of university expansion and possible approaches to providing student accommodation.
- 1.1.4 The second phase of Issues and Options consultation (Phase 1b) will take place in spring 2018 and is intended to cover other place-based issues and Development Management policies.
- 1.1.5 Although there are allocations in the adopted Core Strategy and the Placemaking Plan, additional development opportunities will need to be identified and allocated for the plan period to 2036 in accordance with the overall housing requirement established for B&NES. Pegasus have submitted representations in response to the West of England Towards the Emerging Spatial Strategy Document and consider that the housing requirement should be higher than currently proposed and that in order to meet housing needs a broad portfolio of sites should be complimented with smaller non-strategic sites so as to ensure housing delivery is maximised and that the Plan is positively prepared, justified and effective.
- 1.1.6 In this context, we are promoting Land off Stockwood Lane, Whitchurch which can make a contribution to meeting the housing needs in the plan period. The site has previously been promoted in response to the Call for Sites for the Housing and Economic Land Availability Assessment in January 2015, which was undertaken by each of the four authorities as part of the evidence base for the development of the West of England Joint Strategic Planning Strategy. More recently the site has been promoted in response to the Call for Sites at B&NES (February 2017).
- 1.1.7 The site at Land off Stockwood Lane has been demonstrated to be suitable within a comprehensive evidence base, including reports prepared on behalf of

- Robert Hitchins Ltd, the RSS, and the Spatial Options Consultation for the adopted Core Strategy as identified later in this response.
- 1.1.8 The site has also been promoted by Pegasus through the Whitchurch Neighbourhood Plan Regulation 14 and Regulation 16 public consultations.
- 1.1.9 Whilst these representations focus on the potential of land off Stockwood Lane for residential use we would also draw attention to the suitability of this site for other uses (either with or without residential) to meet demands arising from the increasing population both in the local and wider areas.
- 1.1.10 Appendix 1 provides a red line plan of land off Stockwood Lane, Whitchurch and Appendix 2 provides the concept plans previously submitted.

2. VISION & SPATIAL PRIORITIES

Key challenges & spatial priorities Critical Issues

2.1 Question 1: Have we identified the critical issues facing the District over the next 20 years?

2.1.1 It is noted that the vision for B&NES Local Plan is based on the Council's corporate 2020 vision. However, given that the Local Plan period extends to 2036 it is suggested that this vision needs to be reviewed particularly given changes in national policy. In this way, the Local Plan will be able to reflect a more "up-to-date" Council wide vision and one which is consistent with the wider objectives of the JSP.

2.1.2 The critical issues facing the district over the next 20 years are supported, although they could be better aligned with the JSP. The issues surrounding access to housing are particularly significant and this is recognised nationally in the Housing White Paper, 'Fixing our broken housing market' (February 2017), and more recently in the DCLG consultation, 'Planning for the Right Homes in the Right Places' (September 2017). In B&NES according to the National Housing Federation Annual report 'Home Truths' (February 2017) the ratio of house prices to incomes in B&NES is 11.9, this is one of the highest in the South West. The average house price across the South West is over £256,000 and in some areas, such as B&NES, it is much higher at £349,391. According to "Home Truths",

"We aren't building enough homes in the region. There are 21,000 new households forming each year but less than 19,000 homes were built in 2015."

2.1.3 Whilst the build rate in B&NES has reached an all-time high since 1996 at a total of 871 new homes were built in the 2016/17 financial year, this does not reflect the years when there was an under supply of housing.

2.1.4 The critical issues of the B&NES Local Plan should reflect those of the JSP as set out in Figure 3 of the consultation Publication version of the plan. For example, there is a critical need to substantially boost the housing supply, particularly affordable housing of which the need is acute across the plan area.

2.1.5 The median sales price of a house in Whitchurch was £284,000 in 2016 according to the ONS House Price Statistics for Small Areas. This compares with an average house price of £296,125 across B&NES. Whitchurch therefore provides an affordable location for housing in the local context which is likely to be attractive to the market, especially first-time buyers.

2.1.6 Indeed, the 2011 Census identifies that both B&NES and Mendip experience net outflows of younger households (aged 20-34) which is likely to be a reflection of the affordability problems within these areas. This indicates that the housing needs of younger households are not being fully met within B&NES, but that younger households can be encouraged to remain in the area by providing additional housing opportunities in sustainable locations such as Whitchurch.

2.1.7 The 2011 Census identifies the number of concealed families which existed in 2011 across all areas nationally. A concealed family is a family which does not

- make up a household in its own right. A common example of this is the co-habitation of a family with parents, owing to the inability of the family to access independent accommodation.
- 2.1.8 The 2011 Census demonstrates a rate of concealed families of 2.7% in Whitchurch, far greater than the proportion of concealed families across the whole authority of 1.06% and nationally of 1.85%. This indicates that the existing supply of housing in Whitchurch is not sufficient to accommodate all the households that wish to live in the area.
- 2.1.9 Accordingly, development in Whitchurch is likely to have a greater beneficial effect than development in Bath itself, as it is likely to be more affordable and attractive to younger households (especially those who wish to live in Bristol with all its social and leisure facilities) and will contribute to meeting local needs as well of those of the broader sub-region.
- 2.1.10 By the time of the submission of the B&NES Local Plan Review for Examination the Government's standard methodology will have been implemented. The method if applied universally would lead to a total housing need of just over 266,000 dwellings per annum across the whole country. However, in the Budget in November 2017 a figure of 300,000 dwellings a year was reported. This figure stems from the House of Lords Select Committee on Economic Affairs.
- 2.1.11 It is clear, therefore, that there is a need to significantly increase housing delivery. Pegasus on behalf of Robert Hitchins are responding to the consultation on the West of England Joint Spatial Plan and it is considered that the housing requirement in the JSP should be increased before it is submitted to the Secretary of State for Examination. Any increase in housing numbers in the JSP will need to be accommodated in associated Local Plans as they are reviewed, including the B&NES Local Plan 2016-2036.

2.2 Question 2: Are the suggested spatial priorities the right ones?

- 2.2.1 The suggested spatial priorities are in principle supported. However, it is considered that the Plan should encourage rather than prioritise the use of brownfield sites in accordance with the Core Planning Principles in the NPPF para 17 and para 111.
- 2.2.2 The Housing White Paper "Fixing Our Broken Housing Market" February 2017, indicates that the government has embarked on an ambitious programme to bring brownfield land back into use, which includes: introducing statutory brownfield registers, making funds available through the Home Building Fund (Oct 2016); a wide range of new permitted development rights e.g. converting office to residential use and designating 26 Housing Zones. The Government have also announced their intention to amend the NPPF:

"this, we will amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes, ..."

- 2.2.3 The Housing White Paper noted in para 1.3 that:

“In spite of the progress being made to bring more brownfield land back into use, plans don’t always encourage a sufficiently wide range of sites to come forward to meet local housing requirements.”

- 2.2.4 Whilst the use of brownfield sites is encouraged, given the housing needs and the emphasis on significantly boosting housing supply and delivery, a range and choice of sites is required in order to ensure a 5 year housing supply is maintained.
- 2.2.5 However, the emphasis throughout the Housing White Paper and the more recent DCLG consultation “Planning for the Right Homes in the right places” is on planning for a mix of housing needs, providing for a range and choice of housing sites.
- 2.2.6 Development at Land off Stockwood Lane, Whitchurch would contribute to addressing the strategic priorities, providing a sustainable location set within a landscape framework with green infrastructure on an identified public transport priority route.
- 2.2.7 The Land off Stockwood Lane could be developed in a sustainable way, providing integration with the existing edge of Whitchurch and maintaining a degree of separation, by means of strategic green infrastructure, from the urban edge of Bristol.
- 2.2.8 The site can be developed as part of an expansion to the village of Whitchurch using high quality and best practice design principles.
- 2.2.9 The scheme is being designed to how landscape, movement and development form will work together to help achieve a sense of place and create identity and character to the proposed development for existing and future generations.
- 2.2.10 The development of Land off Stockwood Lane, Whitchurch can provide sustainable development to contribute to the strategic development location at Whitchurch identified in the JSP, helping to meet the needs of B&NES in a sustainable location and on a priority transport route into the City of Bristol. Alternatively, the Land off Stockwood Lane could be identified as a complementary non-strategic development to address the housing needs of Bristol.

SPATIAL STRATEGY OPTIONS

Planning for non-strategic growth – the options

- 2.3 **Question 3: Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth? Please give reasons for your answer.**
 - 2.3.1 The Issues and Options consultation being prepared in the context of the West of England JSP reflects the proposed strategic allocations North Keynsham and Whitchurch leaving a non-strategic requirement of approximately 700 dwellings for the plan period, this assumes that the existing number of

- dwellings of 9,840, already committed through the planning system, will come forward and that the housing requirement proposed in the JSP remains unchanged (despite the standardised methodology and the significant number of outstanding objections).
- 2.3.2 At present, no trajectory is published to support the consultation and so the existing number of dwellings cannot be demonstrated to be deliverable. In the absence of site specific evidence, it has been assumed that circa 10% of commitments will not be delivered by various Inspectors. If this is assumed in B&NES, there will be a need for an additional 984 dwellings even against the currently proposed housing requirement.
- 2.3.3 Pegasus on behalf of Robert Hitchins have submitted representations to the West of England Joint Spatial Plan Publication document and raised objections to the level of housing growth in so far as it is considered that the full OAHN for the West of England should be a minimum of c.140,000 additional dwellings over the period 2016–2036. The new B&NES Local Plan must conform with the Joint Spatial Plan and any amendments through the JSP Examination process would then need to be taken into account in the emerging B&NES Local Plan.
- 2.3.4 If the housing requirement in the JSP remains as proposed then it is considered that the Land off Stockwood Lane should be included in the development quanta proposed for Whitchurch of 1600 dwellings. Indeed, the Land off Stockwood Lane is far less prominent to the setting of Maes Knoll than other parts of the SDL and so should be preferred to these other parcels.
- 2.3.5 However, as a result of the probable increases to the housing requirement and/or to provide sufficient contingency, the delivery of a greater number of homes at Whitchurch should be considered as this provides one of the most sustainable locations to address the needs of Bristol. This would again support the allocation of the Land off Stockwood Lane, either as part of or additional to the Strategic Development Location at Whitchurch.
- 2.3.6 It is evident from the West of England JSP Strategic Development Templates published as part of the evidence base to support the consultation on the JSP that there is considerable uncertainty over the delivery of many of the Strategic Development Locations.
- 2.3.7 The anticipated delivery rates for the Strategic Development Locations (SDLs) are identified in the Strategic Development Location Templates. A number of these are expected to deliver an average of in excess of 200 dwellings per annum (dpa), including the SDLs at Whitchurch (229dpa), Nailsea (234dpa) and Churchill (243dpa). Each of these SDLs is expected to deliver 300dpa in the latter years.
- 2.3.8 A number of national studies have been undertaken of the delivery rates achieved on strategic scale developments. These include the Start to Finish report prepared by NLP in November 2016, the Urban Extensions Assessment of Delivery Rates report prepared by Savills in October 2014 and A Report into the Delivery of Urban Extensions by Hourigan Connolly in February 2014.
- 2.3.9 The Start to Finish report identifies that sites of 2,000 or more homes will on average deliver fewer than 200dpa (with an average of 161); and that sites of up to 1,499 homes barely exceed 100dpa nationally. Of the sample considered

- in the Start to Finish Report there are only four sites nationally which have delivered an average in excess of 200dpa.
- 2.3.10 Of the sample considered in the Savills report there is only one site which has exceeded an average of 200dpa nationally (which is one of the four identified in the Start to Finish report).
- 2.3.11 From the extensive ranges of sites sampled in the Hourigan Connolly report there is again only one site which has exceeded an average of 200dpa nationally. This is the same site identified in the Savills report namely the Eastern Expansion area at Milton Keynes.
- 2.3.12 Therefore, across the extensive range of strategic sites considered within these reports (in excess of 100), there are only 4 which have delivered at the rates anticipated at the SDLs.
- 2.3.13 The Hourigan Connolly report specifies the annual delivery rates of 100 sites. The delivery rates of those sites identified in the Hourigan Connolly report, which have delivered for at least five years are compared with the anticipated delivery rates for the West of England SDLs in the Figure below.
- 2.3.14 This demonstrates that many of the SDLs (including Whitchurch, Churchill, Nailsea, Buckover and Banwell) are assumed to deliver at rates which have not been achieved on any strategic scale site nationally with one exception (the Eastern Development Area at Milton Keynes).
- 2.3.15 This would suggest that the delivery rates assumed for the SDLs are exceptional and that they are unlikely to be achieved. It is therefore highly likely that additional sources of supply will need to be identified to deliver the housing requirement within the plan period.
- 2.3.16 Indeed, by way of example, if it is assumed that the SDLs do not exceed the rate achieved at Dickens Heath (which is the greatest level achieved of any site which has delivered for more than 10 years), then 2,126 fewer dwellings would be delivered on the SDLs within the forthcoming 13 years. This would need to be addressed through the identification of other sources of supply, including non-strategic sites.
- 2.3.17 In terms of the SDLs in B&NES i.e. at Whitchurch and North Keynsham a number of actions are identified to reduce the risks e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, however it is noted that the consultation on the Issues and Options states that it is “imperative that a new road that links the A37 and A4 is completed before the housing development is started, however, no information is available as to the funding, timing and delivery of the road, which will affect the delivery of housing, indeed there is no preferred route on which a business case for funding can be made.
- 2.3.18 In order to provide certainly in terms of delivery a range and choice of sites is necessary. Consequently, more development should be assigned to sustainable locations on the edge of the larger settlements in the authority such as Bristol, in order to reduce the risk to the plan, and to increase certainty over the delivery of dwellings and to the plan being found sound in terms of having a five year supply of deliverable housing land.

- 2.3.19 As identified above, the delivery of all of the SDLs is highly uncertain, especially in terms of viability, and any opportunities to secure this delivery should be taken advantage of.
- 2.3.20 Within the evidence base to the JSP, it is identified that the viability of the SDL at Whitchurch is likely to be dependent upon unidentified, alternative sources of funding. It also requires that within the SDL, 2 new primary schools, a secondary school, a Park and Ride facility, health and community facilities, a new highway connection between the A4 and A37 and other off-site highways works are provided to support the SDL. In particular, the JSP and the Issues and Options consultation document identify that the new highway connection needs to be complete, prior to the occupation of the first dwelling and so this will not be able to be cross-subsidised by residential sales.
- 2.3.21 Even without any allowance for the funding of this infrastructure, the SDL at Whitchurch is unlikely to be viable according to Topic Paper 4. The viability concerns are likely to be able to be addressed (at least partly) through additional development which will provide additional CIL receipts and which will make proportionate financial contributions.
- 2.3.22 In order to provide certainty in terms of delivery, it is necessary to take the opportunities available to improve the viability of SDLs as well as identify a range and choice of sites to provide sufficient contingency to address the non-delivery or delays of the SDLs. Consequently, more development should be assigned to sustainable locations that can deliver independently as well as the SDLs, in order to reduce the risk to the plan, and to increase certainty over the delivery of dwellings and to the plan being found sound in terms of having a five-year supply of deliverable housing land. Both of these are fulfilled through the allocation of the Land off Stockwood Lane.
- 2.3.23 Furthermore, small to medium size sites i.e. up to 500 dwellings, are arguably more deliverable in the short term and not subject to infrastructure constraints and therefore will enable the 5-year land supply to be maintained in the short to medium term in advance of the larger strategic development sites coming forward. The Land off Stockwood Lane could be delivered independently as a non-strategic site with early delivery and appropriate infrastructure, or it could be an early phase of the SDL providing proportionate contributions. Either approach would be beneficial to meeting sub-regional needs in a sustainable location as well as providing the appropriate infrastructure.
- 2.3.24 It is considered that a plan led system should also include contingencies therefore the Council's Housing Land Supply (HLS) over the plan period should not be planned to a minimum with no flexibility to respond to changing circumstances. Therefore, within the overall HLS sufficient headroom should be provided. The Council should apply any phasing proposals with caution so that sustainable development is not prevented from coming forward.
- 2.3.25 As described above, the Land off Stockwood Lane should come forward either as part of the SDL or as a stand-alone non-strategic development, owing to the contribution that it can make to the deliverable supply and to the infrastructure requirements in a highly sustainable location.
- 2.3.26 Paragraph 3.09 of the Issues and Options consultation identifies that Whitchurch is not considered as a non-strategic growth location as it contains a SDL. However, the same approach is not adopted for Keynsham which also contains a SDL. Indeed, Keynsham is explicitly identified as a focus for non-

- strategic growth in paragraph 3.17 in addition to its SDL. This inconsistency is not justified and it actively serves to constrain development at the largest settlement in the South West (Bristol) and within one of the most sustainable settlements within B&NES (Whitchurch).
- 2.3.27 Of the three scenarios, Option 1 of the non-strategic growth options which is the continuation of the existing hierarchical approach is supported. Under this Option new development will be directed to the most sustainable locations outside the Green Belt where access to employment opportunities, facilities and services, as well as to public transport is best.
- 2.3.28 Paragraph 3.17 of the Issues and Options consultation states that this could include locations on the edge of Bath; at Keynsham; Midsomer Norton, Radstock and Westfield in the Somer Valley, then larger villages (with a primary school with capacity/scope to expand). Whitchurch should also be included in this list, as it provides one of the most sustainable locations, directly adjacent to the built-form of the largest settlement in the South West, namely Bristol.
- 2.3.29 Whilst the first part of this option is supported i.e. to the edge of Bath, Radstock and Whitchurch etc, it is considered that given that the figure is 700 dwellings if the Option was applied in its entirety i.e. to certain larger villages outside the Green Belt and other smaller non-Green Belt then this would lead to a dispersal of the 700 dwellings.
- 2.3.30 The proportion of growth to the settlements should reflect the settlement hierarchy and given that the residual requirement after the existing level of commitments, the strategic development locations and the allowance for urban intensification is only 1,372 dwellings, of which the allowance for small scale windfalls is 672, leaving only the figure of 700 dwellings for the whole of the plan period 2016 – 2036.
- 2.3.31 An objection is made to the non-strategic site allowance of only 700 dwellings to be distributed at the non-strategic towns in B&NES in the plan period. The larger villages and smaller villages are not as sustainable, any growth attributed to these settlements should be from the small windfall allowance. Consequently, given the low housing figure a more focussed approach to accommodate the growth is considered more appropriate.
- 2.3.32 Option 2 is a focussed approach. Under this option, all non-strategic development could be focussed at a few key locations, such as on the edge of the towns. These could act as focal points for future housing development with the need for development at the smaller less sustainable settlements facilitated through windfall development.
- 2.3.33 Whitchurch has been identified as a sustainable location for growth over many years. The South West RSS concluded that new urban extensions provided the more sustainable approach to accommodating future development needs. An urban extension to the south east of Bristol was identified in the Draft RSS in June 2006 and endorsed by the Panel following the Examination in Public in 2007 and included in the Secretary of State's Proposed Changes in 2008. This area included the land off Stockwood Lane, Whitchurch.
- 2.3.34 The RSS clearly set out the justification for the exceptional circumstances to alter the general extent of the Green Belt and these circumstances still apply.

Paragraph 4.1.3 of the Secretary of State's Proposed Changes to the RSS (2008) supported this and states that: -

"The Green Belt will continue to maintain the separate identities of Bristol and Bath by keeping land open between and around them. However, necessary provision for new homes and to fulfil the SSCTs' economic potential cannot be met within the existing urban areas. The most sustainable solution is to provide for urban extensions to the SSCT, including at the six locations that have been subject to a review of the green belt."

"Substantial amounts of new housing will be required, provided both within the existing urban area and at a number of urban extensions. These should be sustainable communities, within revised green belt, fully integrated into the existing urban area. There is considerable potential for urban extensions to the south west and south east of Bristol, including land in the City of Bristol administrative area, which can support and complement the regeneration of south Bristol."

- 2.3.35 One of these urban extensions was to the south east of Bristol (within both Bristol City Council area and B&NES). The area identified extended from the Whitchurch area (including land off Stockwood Lane), through Stockwood Vale and then northwards to Hicks Gate.
- 2.3.36 The October 2009 Spatial Options Consultation for the now adopted Bath and North East Somerset Core Strategy, noted that the Whitchurch area has:
- "...the potential to be well integrated into the existing urban area of South East Bristol with access to a wide range of services and facilities supporting the needs of the new and existing communities. Development in this area would offer an opportunity to develop around Whitchurch village. The disused railway track bed is an opportunity to provide a green link from the Bristol urban area out to the new neighbourhood. There are opportunities to extend the existing and planned public transport services from Bristol into the Whitchurch area."**
- 2.3.37 The exceptional circumstances for the release of the Green Belt was also supported by the Inspector for the Bristol Core Strategy in 2011.
- 2.3.38 In the B&NES Spatial Options consultation, 2009, Land at Whitchurch was included in an Area of Search as part of the urban extension to south east Bristol. A strategic site allocation including around 3,500 dwellings at south east Bristol was envisaged including Land off Stockwood Lane.
- 2.3.39 The JSP maintains this position, namely that the developmental needs of the sub-region cannot be met without the release of Green Belt sites. Given the pedigree of Whitchurch (including Land off Stockwood Lane) as forming a sustainable location to meet the development requirements of the sub-region, it comes as no surprise that the exceptional circumstances continue to be recognised.

2.3.40 Indeed, the adopted Core Strategy identifies 6 purposes of including land within the Bristol – Bath Green Belt. Land at Whitchurch is considered in the table below against each of these purposes:

Purpose	Comment
1. To check the unrestricted sprawl of Bath and Bristol	Amending the inner boundary of the Green Belt to accommodate limited development at Whitchurch will not result in the “unrestricted sprawl of Bristol.” Indeed, this will be contained within the defensible boundary which arises through the proposed new highway.
2. To prevent the merging of Bristol, Keynsham, Saltford and Bath	Land at Whitchurch does not contribute to this purpose.
3. To assist in safeguarding the countryside from encroachment.	Applies to any undeveloped land in the Green Belt
4. To preserve the setting and special character of Bath.	Land at Whitchurch does not contribute to this purpose.
5. To assist in urban regeneration of Bath and Bristol by encouraging the recycling of derelict and other urban land.	<p>Release of limited amount of land from the Green Belt at Whitchurch will not adversely impact on the recycling of derelict and other urban land within Bristol. Indeed, as noted in the October 2009 consultation:</p> <p><i>“This area adjoins south Bristol which is a priority focus for comprehensive development and regeneration with development, including major land use change, to be focused around the Hartcliffe roundabout area and broadly covered by Knowle West, Hengrove Park, Inns Court, Imperial Park and the Hartcliffe campus. This area also adjoins Stockwood, an area of Bristol with one of the lowest levels of employment opportunities for a neighbourhood in Bristol and high levels of out-commuting to work, an urban extension could help address this issue and provide local employment.”</i></p>
6. To preserve the individual character, identity and setting of Keynsham and the villages and hamlets within the Green Belt.	<p>Release of a limited amount of land from the Green Belt at Whitchurch will not adversely impact on the character, identity and setting of Whitchurch.</p> <p>The Council’s Urban Extension Environmental Capacity Appraisal</p>

	(October 2006) identified areas around Whitchurch as having potential to accommodate development. This analysis was founded on an appraisal/analysis of landscape and visual aspects.
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- 2.3.41 Whitchurch (like Keynsham) therefore forms a sustainable location both for the SDL and for non-strategic growth.
- 2.3.42 Indeed, owing to the location of Whitchurch, immediately adjacent to Bristol, this not only forms a sustainable location to address the needs of B&NES but also those of Bristol both through the SDL and non-strategic growth.
- 2.4 Question 4: Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES? Please give reasons for your answer.**
- 2.4.1 Please see response above.

3. STRATEGIC DEVELOPMENT LOCATION: NORTH KEYNSHAM

EVIDENCE BASE

3.1 Question 5a: Have we considered all the issues?

3.1.1 Pegasus has no comments on this question as it relates to the SDL North Keynsham.

3.2 Question 5b: What other evidence do you think we need to consider?

3.2.1 Pegasus has no comments on this question.

VISION AND OBJECTIVES

3.3 Question 6a: What are your views on the vision and objectives?

3.3.1 Pegasus has no comments on this question.

3.4 Question 6b: What type of place should be created here?

3.4.1 Pegasus has no comments on this question.

Link road alignment

3.5 Question 7a: What do you think of the proposed road alignment?

3.5.1 Pegasus has no comments on this question.

3.6 Question 7b: Do you have any views on the existing crossing points? Have you got any thoughts on the overall movement strategy?

3.6.1 Pegasus has no comments on this question.

Internal street network and wider connections

3.7 Question 8a: What do you think of the proposed approach to the street network and wider connections?

3.7.1 Pegasus has no comments on this question.

3.8 Question 8b: Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

3.8.1 Pegasus has no comments on this question.

Landscape impact

3.9 Question 9a: What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?

3.9.1 Pegasus has no comments on this question.

3.10 Question 9b: How can we improve the Green Infrastructure network through the site?

3.10.1 Pegasus has no comments on this question.

Housing mix

3.11 Question 10a: What should the housing mix comprise of?

3.11.1 Pegasus has no comments on this question.

3.12 Question 10b: Is there any scope for other forms of housing, for example student accommodation?

3.12.1 Pegasus has no comments on this question.

Zero carbon development

3.13 Question 11a: Do you agree with the principle of aiming for a Zero Carbon development?

3.13.1 Pegasus has no comments on this question.

3.14 Question 11b: How ambitious should we be? How do you think this aim could be achieved?

3.14.1 Pegasus has no comments on this question.

Avon Valley Wildlife & Adventure Park

3.15 Question 12a: How can Avon Valley Wildlife & Adventure Park be best integrated into the new development?

3.15.1 Pegasus has no comments on this question.

3.16 Question 12b: What opportunities are there to minimise visual impact from the Cotswolds?

3.16.1 Pegasus has no comments on this question.

3.17 Question 12c: Do you agree with the requirement to link with the Bristol to Bath cycle path?

3.17.1 Pegasus has no comments on this question.

4. STRATEGIC DEVELOPMENT LOCATION: WHITCHURCH

Local Plan – Issues & Options document – Proposed vision

4.1 Question 13a: What additional aspirations would you have here?

4.1.1 It is considered that the SDL and any non-strategic growth should be accommodated between the proposed new South Bristol Link Road and the existing development of south Bristol.

4.1.2 Such a proposal would result in a new defensible boundary being created for the Green Belt rather than the current proposals, which have no defensible boundaries to the proposed revised Green Belt.

4.1.3 The proposed vision currently makes no reference to the Park and Ride facility that is proposed to be delivered at Whitchurch as shown in Figure 5 p.24 of Background Paper 3¹.

4.2 Question 13b: How can this vision be delivered?

4.2.1 The vision for the delivery of 1600 new dwellings in the plan period up to 2036 and for an additional 900 dwellings beyond the plan period can only be delivered by working in partnership with developers and landowners who have aspirations to deliver development in Whitchurch and who are willing partners to the vision for the wider area that is being promoted by the JSP and delivered by B&NES through its development plan process.

4.2.2 If the delivery of a strategic link road is key to the delivery of the SDL then further consideration to the route of the road and the funding mechanisms to ensure its delivery should also be published to ensure that sites that lie in close proximity to the route of the road, and which could contribute to its delivery are also considered for development.

4.2.3 The JSP evidence base document 'Infrastructure Position Statement' states that a business case for the delivery of the road is still in preparation however the B&NES Winter 2017 Regulation 18 'Proposed Vision' for Whitchurch is premised on the delivery of new strategic infrastructure;

'...a new multi-modal link road connecting the A4 to the A37, and onwards to the South Bristol Link Road, will be constructed prior to development'.

4.2.4 Currently the consideration of the location of the SDL is being considered separately from the consideration of the route of the road, whereas in practice the two are inextricably linked.

4.2.5 The B&NES Winter 2017 consultation stresses that the Whitchurch SDL will be a '**residential led community**' and yet its delivery is predicated on the upfront delivery of a multi-million pound strategic transport infrastructure

¹ http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_background_paper.pdf

scheme which as yet has an unproven business case and over which there is much uncertainty concerning deliverability².

- 4.2.6 Appendix A of The West of England Joint Spatial Plan Joint Transport Study (October 2017) lists the estimated costs of delivering the transport infrastructure proposed to deliver the vision for Whitchurch as follows;

Road Scheme 5 - £125 million (including risk)

Metro Bus Scheme 6 £90 million (including risk)

Whitchurch Park & Ride part of the £133 million for all the proposed P&R improvements in and around Bristol.

- 4.2.7 As described previously, the SDL at Whitchurch is unlikely to be viable even without these infrastructure requirements according to Topic Paper 4 of the JSP.

KEY ISSUES AND OPTIONS

Heritage and landscape assets

4.3 Question 14a: Is this the right approach?

The Whitchurch Strategic Development Location: Landscape and Visual Impact Assessment' (2017) fails to provide any analysis of the land off Stockwood Lane. This assumes that the site has not been assessed for the purposes of the 2017 study – other sites to the west of the A37 abutting the south of Bristol have been assessed therefore it is considered that the Council have been inconsistent in their approach to the consideration of potential development sites at Whitchurch by discounting the Stockwood Lane site, without explanation, by not including it within the study.

4.4 Question 14b: Could some development take place in other areas outside of this broad development location? For example:

- In Stockwood Vale?
- Within the setting of Queen Charlton?
- Within the setting of Maes Knoll?

Development which affects the significance of heritage assets and their setting including the Queen Charlton Conservation Area and the Scheduled Monument of Maes Knoll would be contrary to paragraph 128 of the NPPF. Accordingly, any development at Whitchurch should avoid these areas and be focussed at less constrained areas, such as the Land off Stockwood Lane.

4.5 Question 14c: What would be the benefits of this?

- 4.5.1 As set out previously, some of the Whitchurch SDL has a greater effect on the significance of Maes Knoll and its setting, than Land off Stockwood Lane. Accordingly, in order to secure a viable SDL and provide for housing needs in a

² [https://www.jointplanningwofe.org.uk/gf2.ti/-/845730/31414917.1/PDF/-/Infrastructure Position Statement.pdf](https://www.jointplanningwofe.org.uk/gf2.ti/-/845730/31414917.1/PDF/-/Infrastructure%20Position%20Statement.pdf) pp.54 & 55

timely fashion, the Land at Stockwood Lane should be allocated as part of the SDL or alternatively as a non-strategic location for growth to complement the SDL.

4.6 Question 14d: What evidence is available to support development in these areas:

4.6.1 Pegasus has no comments on this question.

4.7 Question 15: What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:

- i. Continue to protect the Green Belt gap & keep the village separate?
- ii. Allow some development, but keep a smaller gap?
- iii. Close the gap with development, and potentially have less elsewhere?

4.7.1 The Land off Stockwood Lane provides a sustainable location for growth, with the potential to contribute to the infrastructure required at the SDL. It also provides for the maintenance of a gap to prevent the coalescence of Bristol with Whitchurch Village, although these have already coalesced and so the need for such a gap is questionable. The gap would be smaller than that currently identified but would be protected as Green Infrastructure for the benefit of residents.

4.7.2 The benefits of allocating the Land off Stockwood Lane will therefore provide significant social and environmental benefits, through the provision of on-site facilities and the support for the broader SDL, as well as significant environmental benefits through the provision of accessible Green Infrastructure with a strong boundary which will serve to protect the gap.

Local facilities

4.8 Question 16a: How could the existing village centre be enhanced to cater for the needs of an increased population?

4.8.1 The JSP and Local Plan Review both propose significant infrastructure improvements which will benefit existing residents.

4.8.2 The existing facilities within the village centre will also benefit from the increased footfall arising from the SDL and non-strategic growth. This should be maximised through the provision of appropriate cycle and footpath links from new developments. The increased patronage will serve to make the existing facilities more viable (and thereby protect these) as well as making the Village Centre a more attractive proposition for facilities to start-up or relocate. Land off Stockwood Lane, is in close proximity to the Whitchurch Primary School.

4.9 Question 16b: How do we best integrate new local centre and facilities with the existing communities?

4.9.1 Any facilities provided within the new local centre should be required to demonstrate that they will not adversely affect the existing centre. This will ensure that the facilities at each are complementary and do not detract from one another.

Green Infrastructure

4.10 Question 17a: How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities and to the natural environment?

The allocation of the Land off Stockwood Lane provides an opportunity to increase the access to Green Infrastructure through the provision of the gap as accessible Green Space which will be immediately accessible to the residents of the existing Whitchurch Village and Stockwood.

4.11 Question 17b: How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could they form part of a new strategic parkland for the area?

4.11.1 There is the opportunity to provide information to the residents of new houses including information boards, which publicise the access and availability of the existing environmental assets as well as newly arising Green Infrastructure within the SDL and non-strategic growth locations.

Sustainable and active travel

4.12 Question 18a: How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?

4.12.1 The JSP already plans for a multi-modal connection between Whitchurch and Keynsham which should encourage cycle and pedestrian movements between these settlements. This connection will also link with the A4174 Ring Road which already benefits from cycle and pedestrian routes. It will therefore open up the entirety of Bristol to cyclists (primarily).

4.12.2 Through the allocation of Land off Stockwood Lane, pedestrian and cycle routes can be provided to Staunton Lane and Craydon Grove, from which there already exist cycle and pedestrian links to the retail centres at Gilda Parade and Stockwood, as well as South Bristol Community Hospital, Hengrove Leisure Centre, City of Bristol College, Hawkfield Business Park, Hengrove Park Recreation Area, Imperial Retail Park, Knowle Golf Course, Stockwood Vale Golf Course and numerous public transport connections to the city centre and beyond. The Land off Stockwood Lane forms the closest part of the SDL to these facilities and is thereby likely to support a greater modal shift than other parts of the SDL.

4.13 Question 18b: How can we encourage greater use of public transport?

4.13.1 As above, through providing appropriate pedestrian and cycle routes to public transport connections, the propensity to use sustainable modes of transport

will be maximised. This can be provided for within the allocation of the Land off Stockwood Lane.

4.14 Question 18c: How can we encourage people to be more active, more often?

4.14.1 The accessibility of recreational facilities is a key determinant of the activity of the population. As set out above, the Land off Stockwood Lane provides sustainable connections (in the form of pedestrian and cycle links) to a range of recreational facilities including a Leisure Centre and Golf Courses. Accessible Green Infrastructure would also be provided on-site providing the opportunity for residents to exercise in the locality.

4.15 Question 18d: What other ideas could be explored to achieve these objectives?

4.15.1 Pegasus has no comments on this question.

Employment

4.16 Question 19: What sort of employment would be suitable as part of the new development and how much?

4.16.1 Pegasus has no comments on this question.

DEVELOPMENT PRECEDENTS

4.17 Question 20a: What are the qualities of these places that could be used in either of the new development areas?

4.17.1 Pegasus has no comments on this question.

4.18 Question 20b: What aspects should we seek to avoid?

4.18.1 Pegasus has no comments on this question.

4.19 Question 20c: What other precedents would you use?

4.19.1 Pegasus has no comments on this question.

5. HOUSING NEEDS AND STUDENT ACCOMMODATION

Universities' growth & student accommodation

5.1 Question 21a: Which of the options should be the preferred approach?

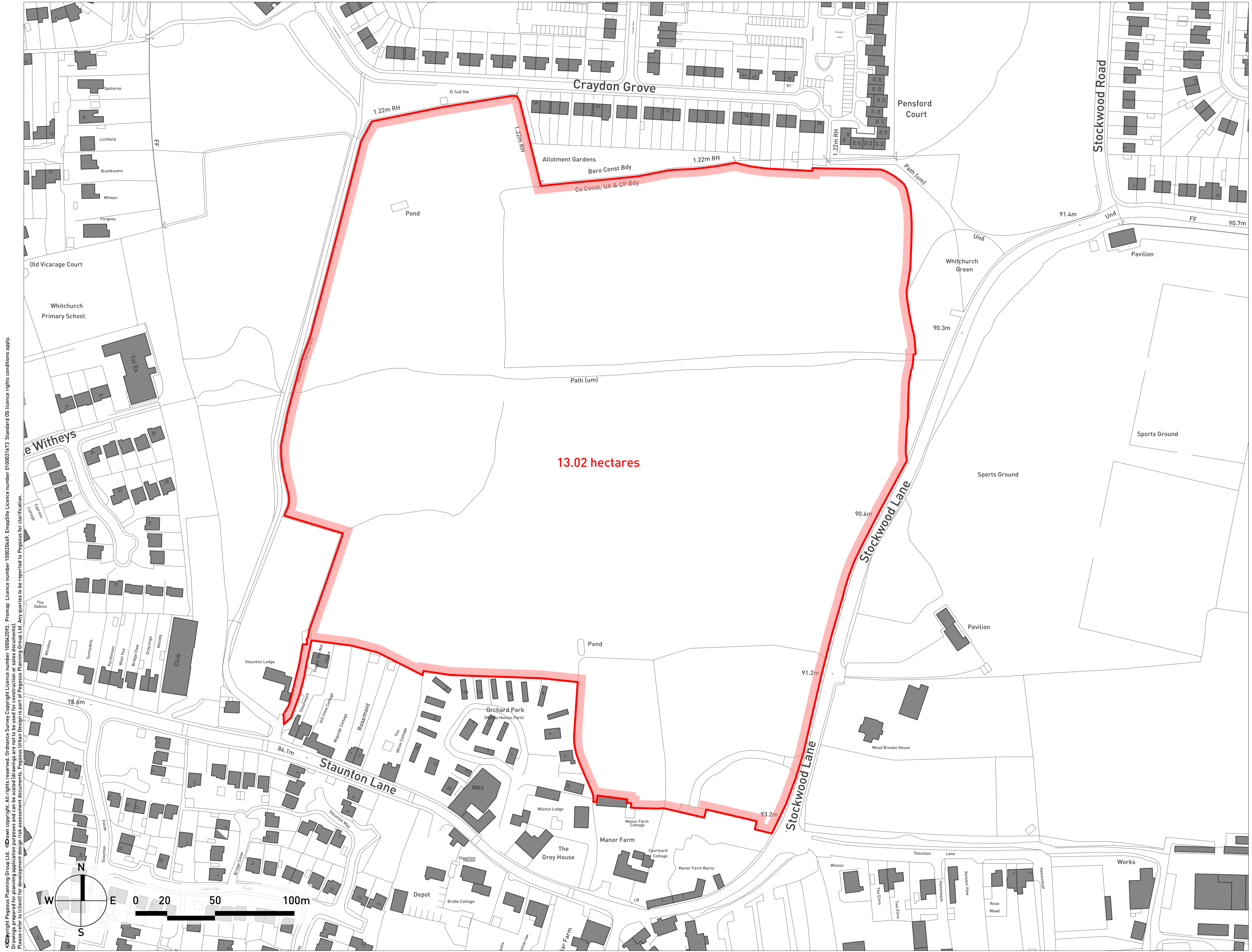
5.1.1 Pegasus has no comments on this question.

5.2 Question 21b: Are there any other options?

5.2.1 Pegasus has no comments on this question.

APPENDIX 1

SITE LOCATION PLAN



Key:
 Site boundary (13.02ha)

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Land off Stockwood Lane, Whitchurch - Site Location Plan



APPENDIX 2

CONCEPT MASTERPLAN

PLAN TO BE CONSIDERED AT FORTHCOMING INQUIRY IN OCTOBER 2013



POSSIBLE REDUCED SCHEME UPON WHICH COMMENTS ARE SOUGHT BY 15TH SEPTEMBER 2013

