
B&NES Placemaking Plan Examination:

Examination Statement Matter 4: Environmental Quality

By Barton Willmore

On behalf of Taylor Wimpey, Bovis Homes, and
Land Improvement Holdings

Representor no. 7217, comment no. 3

August 2016

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1.0 INTRODUCTION

- 1.1 This Examination statement has been prepared by Barton Willmore on behalf of Taylor Wimpey, Land Improvement Holdings and Bovis Homes who control land at Whitchurch, within B&NES. A site plan is included in appendix 1.

- 1.2 Submitted alongside these representations is a technical note prepared by FPCR which provides a summary of the landscape character of the land at Whitchurch and assesses whether the application of Policy NE2A is justified and necessary. This statement is attached at appendix 2.

2.0 BACKGROUND

- 2.0 The four West of England authorities, including B&NES are preparing a Joint Spatial Plan that will identify the housing and employment requirements in the West of England over the period 2016 - 2036, along with a spatial distribution strategy identifying the best locations for growth.
- 2.1 In November 2015, the West of England authorities produced a Joint Spatial Plan (JSP) Issues and Options document for consultation.
- 2.2 This identified a requirement of 85,000 additional homes over the plan period within the Bristol HMA, excluding B&NES. The West of England Housing and Economic Review prepared by Barton Willmore (January 2016), commissioned by 10 major housebuilders and land promoters has found that the West of England authorities have vastly underestimated the housing requirement for the area. To enable a direct comparison to be made, excluding B&NES, Barton Willmore concluded that the full objectively assessed need (OAN) for the West of England 2016 – 2036 to be 132,540. With B&NES, Barton Willmore calculate the full OAN to be 153,440 dwellings.
- 2.3 Since the JSP Issues and Options was published, B&NES has resolved to review its SHMA and therefore, the JSP will identify the housing requirements for the Bristol and Bath HMAs.
- 2.4 The Draft JSP is due for consultation in the autumn 2016.

Need For Urban Extensions to Bristol

- 2.5 Notwithstanding the Council's underestimation, on the West of England's 85,000 (excluding BANES) dwelling requirement figure alone, once commitments and intensification potential is deducted, the West of England calculates that 17,000 of these homes will need to be delivered on greenfield land within the Bristol HMA, thus demonstrating the need for urban extensions to the city. With the B&NES HMA, this figure will be considerably higher. Based on the full OAN for the Bristol and Bath HMAs, Barton Willmore calculates the greenfield residual to be between 45,440 and 66,440 homes.

- 2.6 Bristol's administrative boundary is tightly drawn around the city and therefore, for the city to grow, urban extensions will be required in the neighbouring authorities of South Gloucestershire, North Somerset and B&NES.

Land at Whitchurch

- 2.7 Whitchurch is a sustainable location for growth and has previously been identified as a suitable location for an urban extension to Bristol, within B&NES.
- 2.8 The Proposed Changes to the South West RSS identified an urban extension to the south east of Bristol for 9,500 homes which included land at Whitchurch.
- 2.9 There were three parts to the RSS area of search south-east of Bristol: Hicks Gate on the A4 between Bristol and Keynsham; land at Whitchurch; and land at Stockwood Vale. Through the B&NES Core Strategy process, Stockwood Vale was excluded early in the process. It is an important landscape feature, it plays a strategic Green Belt role and the topography is challenging. Hicks Gate was also rejected because its capacity was considered to be limited, as a result of which it would not be large enough to guarantee being able to support a range of local services. It is also physically separate from Bristol and could create an isolated development.
- 2.10 B&NES themselves have assessed and found to be acceptable levels of housing growth between 3,300 and 3,650 at Whitchurch. The Core Strategy Spatial Options Consultation (October 2009), states the following in relation to development at Whitchurch:

"The lower level of housing provision suggested and subject to necessary infrastructure (i.e. 3,300 rather than 3,650 houses) is considered to be the preferred option as this would recognise the environmental impact of development and have a lesser impact. It is believed that this level of development could largely be accommodated within areas assessed as having a lesser environmental impact."

- 2.11 The Core Strategy SA recognised that the 3,300-3,650 range provided a smaller scale of development than the draft RSS which would pull development back from areas that could cause impacts on the setting of the Maes Knoll scheduled monument and affect the Chew valley skyline. The main uncertainty recognised within the SA at that time was the need for improvements to transport infrastructure, much of which was reliant on the South East Bristol transport package.

2.12 The Council concluded at paragraph 5.11 of the Core Strategy Spatial Options Report (October 2009) that,

“...subject to phasing and appropriate infrastructure as aforesaid and through Strategic Sustainability Assessments and Environmental Capacity Appraisals, that there is considered to be capacity for “around 3,500 dwellings at Whitchurch.”

2.13 When RSSs were abolished, the strategic allocation was subsequently dropped from the Core Strategy as B&NES considered the housing requirement to be much lower than that in the RSS and that the need for greenfield allocations was limited. Whilst the Core Strategy did end up making an allocation at Whitchurch (at Horseworld – to the north of land promoted by Taylor Wimpey, Bovis and Land Improvement Holdings), it was at a far smaller scale than originally envisaged.

3.0 PREJUDICING AN URBAN EXTENSION AT WHITCHURCH

- 3.1 When assessing appropriate locations to accommodate the level of housing now needed within the West of England, it is therefore important to recognise that the principle of an urban extension at Whitchurch is one that has previously been accepted by the Council which was their position following a significant amount of work investigating the environmental constraints of the area.
- 3.2 This is amplified by the fact that this area of land at Whitchurch also features as one of the options being explored in the West of England JSP.

Policy NE2A: Landscape Setting

- 3.3 PPS7 created a step change in moving away from local landscape designations to carefully drafted, criteria-based policies as providing sufficient protection without the need for rigid local designations that may unduly restrict acceptable, sustainable development.
- 3.4 This continues to be the Government's preferred approach which has been carried forward into the NPPF:

"Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged (para 113)."

- 3.5 Placemaking Plan Policy NE2 provides a criteria based policy consistent with guidance in the NPPF which aims to conserve and enhance landscape character and which is sufficient to assess applications for development in respect of their impact on the landscape. However, policy NE2A introduces local landscape designations around a number of settlements in B&NES, including Whitchurch, which conflicts with national planning policy guidance in the NPPF. These local 'landscape setting' designations are shown on the draft Placemaking Plan Proposals Map. Policy NE2A provides special protection to the landscape setting around large and small settlements and states:

"Any development should seek to conserve and enhance the landscape setting of settlements and their landscape character, views and features. Development that would result in harm to the landscape setting of settlements will not be permitted."

- 3.6 As currently written, potentially any change around these settlements could be construed as 'harm' and hence development will not be permitted. This affords the same protection as nationally designated landscapes which again, goes against the thrust of the NPPF which requires levels of protection for nationally and locally important sites to be commensurate with their importance. This means giving great weight to conserving National Parks and AONBs, with less weight towards locally important landscapes.
- 3.7 Bristol is a regional growth centre which will need to accommodate significant additional growth within the urban fringe which is to be addressed in the emerging JSP. An overly protective approach to developing land on the urban fringe as is proposed in the policy NE2A could stifle much-needed sustainable development, and should not be encouraged through unjustified local landscape designations. On this basis, policy NE2A should be deleted.

Policy CP7 and Diagram 20: Green Infrastructure

- 3.8 We object to the proposed designation of the Green Infrastructure policy for land at Whitchurch. The annotation on the proposals map shows a wide GI corridor running through land proposed as an option for development through the Joint Spatial Plan. Whilst we do not object to the principle of the proposed policy, the extent of the corridor should be reduced and it should be made clear that the extent of the corridor is indicative only and should not be taken literally. The aim should be for green infrastructure to be incorporated within new developments, not to prevent the development of sustainable new communities. Without this change, the policy would be unsound as it would not be justified.

4.0 CONCLUSION

Policy NE2A

- 4.1 We object to the proposed Landscape Setting policy NE2A around Whitchurch because it is not justified and is inconsistent with national policy.
- 4.2 The Landscape Setting designation covers part of the land at Whitchurch included within the site proposed as an option for development through the Joint Spatial Plan. Whilst future proposals for this site can take account of, and where possible conserve and enhance the landscape character of Whitchurch, it should not be used as a policy to restrict development where it is required to meet the long term housing needs of the West of England. This policy is therefore unsound as it is not justified nor consistent with national policy.
- 4.3 Landscape Character policy NE2 is sufficient to assess applications for development in respect of their impact on the landscape and policy NE2A should be deleted.

Policy CP7 and Diagram 20

- 4.4 The extent of the green infrastructure corridor running through land proposed as an option for development through the Joint Spatial Plan should be reduced and it should be made clear that the extent of the corridor is indicative only and should not be taken literally. The aim should be for green infrastructure to be incorporated within new developments, not to prevent the development of sustainable new communities. Without this change, the policy would be unsound as it would not be justified.

APPENDIX 1

APPENDIX 2