West of England

Topic Paper 2

Spatial Strategy

NOVEMBER 2017
TOPIC PAPER 2 - FORMULATION OF THE JSP SPATIAL STRATEGY

1.0 CONTEXT

1.1 The purpose of this paper is to set out the approach that the four West of England Unitary Authorities (UAs) have taken in developing the West of England Joint Spatial Plan (JSP).

1.2 The critical issues which the four Unitary Authorities have identified need to be addressed by the JSP are reproduced in Diagram 1 below. They have been drawn from the analysis of evidence and the Sustainability Appraisal (SA) Scoping report).

1.3 The Plan’s Strategic Priorities (Diagram 1) have been formulated in response to the critical issues in order to provide a steer for the development of the spatial strategy to help deliver the Plan’s vision. The critical issues and Strategic Priorities have defined the scope of the Plan.

**Diagram 1: The JSP Critical Issues and Strategic Priorities**

<table>
<thead>
<tr>
<th>Critical Issue</th>
<th>Strategic Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. There is a critical need to substantially boost the housing supply, particularly affordable housing of which the need is acute across the Plan area.</td>
<td>1. To meet the sub-region’s identified housing needs, in a sustainable way. In particular, to make a substantial step change in the supply of affordable housing across the plan area.</td>
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<tr>
<td>2. Economic prosperity has brought substantial benefits to residents, communities &amp; the environment. However, prosperity has not been shared equally by all communities as there are pockets of deprivation within the sub region.</td>
<td>2. To pursue inclusive economic growth by accommodating the economic growth objectives of the LEP Strategic Economic Plan. Particularly to promote the growth of existing employment centres such as the Enterprise Zones and Enterprise Areas to ensure more inclusive growth and life chances for all across the West of England, to help address inequality and improve accessibility to jobs.</td>
</tr>
<tr>
<td>3. The form and function of development in some parts of the West of England has resulted in significant pressure on infrastructure and settlement patterns which are over-reliant on the private car.</td>
<td>3. To deliver a spatial strategy which; focuses on three primary centres of Bristol, Bath and Weston-super-Mare. and recognises the complementary role of market towns to achieve sustainable growth, ensures that new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel.</td>
</tr>
<tr>
<td>4. This inhibits wealth creation and productivity and contributes to climate change</td>
<td>Through a place making approach promotes places of density and</td>
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and poor health. scale which have a range of facilities, activities and which encourages health lifestyles and cultural wellbeing. Integrates high quality, multi-functional green infrastructure. Reduces greenhouse gas emissions and ensure resilience to the impacts of climate change

| 5. The sub-region benefits from a world class environment which brings substantial economic and community benefits and contributes significantly to the quality of life of residents, visitors and businesses. | 4. To protect and enhance the sub-region’s diverse and high quality natural, built and historic environment and secure a net gain in biodiversity. To prioritise development on brown field locations, optimise densities and retain the overall function of the Bristol and Bath Green Belt. |

1.4 Based on the above, the JSP the primary purpose of the JSP is to;

   (a) address the sub-region’s housing need and jobs ambition,
   (b) identify the strategic infrastructure needed to support this growth,
   (c) formulate the most appropriate spatial strategy to accommodate this growth and provide the basis for the preparation of more detailed Local Plans.

2.0 KEY EVIDENCE

2.1 Some of the key evidence informing the development of the spatial strategy is summarised below in relation to each of the critical issues.

2.2 Critical Issue 1: The formulation of the Housing Requirement (based on the two SHMAs) as set out in Topic Paper 1. This identifies a Housing Requirement of 102,200 new dwellings with flexibility through the provision of 105,500 new dwellings and an identified contingency.

2.3 Critical Issue 2: The Jobs growth ambition of 82,200 new jobs as explained in Topic Paper 3 and the identification that the sub-region forms a single Functional Economic Market Area (FEMA). The EDNA confirms that a significant supply of employment land & job generation will be in the existing urban areas (ie EZs & EAs)

2.4 Critical Issue 3: the UAs have recognised that the interdependence of transport and land-use issues and have therefore prepared the JSP and the Joint Transport Study (JTS) together. The JTS is a significant driver of the spatial strategy, especially in light of the requirements of the NPPF that;

   - Plans should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (Para 34)
   - Local Plans should support a pattern of development which facilitates the use of sustainable transport modes (Para 30).
• Plans should focus significant development in locations which are or can be made sustainable NPPF & test of soundness (Para 17)

2.5 Other key evidence includes;
• The assessment of strategic development options as set out in the Strategic Development Location Templates (ref x)
• The Green Belt Assessment (Ref X),
• The Sustainability Appraisal (Ref X)
• The responses to the consultations on the Issues & Options and the Emerging Spatial Strategy

3.0 IDENTIFYING ALTERNATIVES AND TESTING OPTIONS

Sources of Housing Supply
3.1 Having identified the quantitative need for homes and jobs, the formulation of the spatial strategy initially involved assessing the potential supply of housing from the following sources:

a) reviewing the existing commitments and other sources of supply eg empty homes, specialised housing such as Students & C2 etc,

b) assessing urban capacity including the scope to optimise density, which has been termed ‘urban living’

c) making an allowance for small windfall sites of between 1-9 homes that is likely to occur in the Districts under most scenarios),

d) agreeing a quantum ‘non-strategic growth’, over 10 homes and below 500 homes to be delivered through Local Plans

e) assessing locations which could accommodate strategic levels of development (termed in the JSP as Strategic Development Locations or SDLs - see below).

Identifying Strategic Locations
3.2 The identification and assessment of the suitability, capacity and deliverability of the SDLs is set out in more detail in the SDL Methodology Paper. This entailed joint working across the sub-region to identify locations, or clusters of locations, with a capacity of more than 500 homes and other uses.

3.3 In light of the tests of soundness, it is important to consider all reasonable options. However, as described in the SDL Methodology Paper, reflecting the advice in footnote 9 to NPPF para 14, some locations were excluded. This includes locations in high flood risk zones, AONBs, designated heritage assets and in other key ecological designations. The only exception to this is designated Green Belt which is addressed in more detail later in this paper. It was evident early on that there was limited scope for a further strategic outward expansion of Bath over and above existing Core Strategy proposals in light of the particular environmental assets of the City.
3.4 The SDL work took account of the responses to the Calls for Sites and other sources. The UAs also sought to identify other sustainable strategic locations which, as described in SDL Methodology Paper (ref), tended to be those locations well related to existing settlements. Isolated locations were therefore not pursued, although new settlements were not ruled out. This stage of the process helped to identify the reasonable locational alternatives (see table 2 on page 28 of the Emerging Spatial Strategy). The range of potential strategic locations identified falling into the following broad typologies;

- Urban extension: planned outward expansion of Bristol, Bath or Weston-super-Mare.
- Town expansion: planned expansion of freestanding towns.
- A new settlement(s)
- Other settlements/locations: a range of opportunities such as village expansion or clusters of locations which together form a strategic option.

Scenario testing

3.5 In seeking to most effectively deliver the Strategic Priorities, a number of scenarios were formulated and tested. These were not draft strategies, nor were they exclusive, but entailed combining a number of strategic locations for testing to assess the implications of different approaches. This process began in the Issues & Options Paper published in November 2015 where key determinants which were to influence the spatial strategy were considered to focus on;

- Avoiding a change to the Green Belt.
- Concentration at the Bristol urban area.
- Focus strategic development growth at Bristol, but also other towns and expanded settlements.
- A focus on transport corridors
- New settlement (or a limited number of expanded settlements).

3.6 Based on the above assessments and informed by the spatial priorities, the transport assessments, the Green Belt assessment and Sustainability Appraisal, the responses to the consultations and other evidence, it was considered the spatial strategy underpinning the JSP should reflect the following key principles;

- The first priority should be to maximise the potential of urban areas (termed ‘urban living’ in the JSP to clarify that this entails a qualitative approach, and not ‘town-cramming’ - see chapter 4 of the Issues & Options Paper for more detail). However as well as qualitative issues, this supply must be deliverable to ‘effective’, one of the NPPF test of soundness.
- The use of greenfield locations should be minimised but if needed, locations well related to existing urban areas should be used, either by physical
proximity or on existing or potential sustainable transport corridors (see para 2.4 above)

- The need to reflect the role of market towns and other settlements in the spatial strategy,
- Recognition that locations in the Green Belt are likely to be needed and that there are exceptional circumstances for the strategic release of some Green Belt locations (see para x below) but the impact on the Green Belt should be limited as far as possible.
- Recognising the different functional requirements of the constituent parts of the sub-region and the links with adjoining Local Authorities. This includes:
  - Some locations must be well related to Bristol to assist with meeting those parts of the housing need that it does not have the capacity to accommodate.
  - Provision of locations well-related to WSM, which has a separate travel to Work Area, and in order to address the housing needs.
  - The recognition that the housing needs of both the Housing Market Areas (HMAs) should be considered, taking into account the spatial implications
  - Avoid the continued sprawl of the Bristol conurbation north and eastwards and refocussing development towards the south in light of the 7,800 homes built here since 2006 and a further 12,800 homes committed.
- Favouring locations which have cumulative benefits in infrastructure provision, in that they can both facilitate the provision of new infrastructure as well as addressing existing pressure on existing infrastructure,
- The need to ensure a variety of sources of sustainable housing supply to facilitate delivery.
- Embracing new developer delivery models that offer an opportunity through garden village principles to capture more of the land value, create the governance and recycle profits into long-term community stewardship.

3.7 A substantial part of the sub-region (around 48%) lies with the Bristol- Bath Green Belt. This creates a tension as some of the most sustainable (or potentially sustainable) locations in terms of para 3.6 above are within the Green Belt. NPPF para 83 states that once established, Green Belt boundaries should only be altered in exceptional circumstances. The Housing White Paper 2017 provides further guidance that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;
- optimising the proposed density of development; and
• exploring whether other authorities can help to meet some of the identified development requirement.

3.8 Under the “Protection of Green Belt “scenario in para 3.6 above, the UAs assessed whether there is scope to meet the identified need for development by avoiding Green Belt locations. This included all the options set out in the HWP four bullet points referred to above.

3.9 The outcome of this testing, was that seeking to avoid the Green Belt entirely would result in a strategy which would entail highly unsustainable patterns of development. Given this would fail to perform in transport terms and for which mitigation would in any event only be partial, it would be very difficult to deliver and would severely compromise the Plan’s Strategic Priorities. Therefore in light of the extent of the need for housing, the need to prioritise the most sustainable locations, and the lack of reasonable alternatives led the 4 UAs to conclude that there were exceptional circumstances that justified the release of locations from the Green Belt in order to formulate the most appropriate strategy.

3.10 Based on the evidence and the conclusions above, the preferred spatial strategy for the West of England is that which the UAs consider to be the most appropriate and which will most effectively meet the Strategic Priorities

4.0 THE PREFERRED SPATIAL STRATEGY

4.1 The spatial strategy, as shown in the Key Diagram, is a positive response to the identified growth needs of the West of England. It enables the effective delivery of homes and jobs in a sustainable way, properly aligned with new infrastructure and with flexibility. It protects and enables the enhancement of the sub-region’s high quality environment, provides many benefits to existing communities and it facilitates the development of exemplar, sustainable new places to accommodate growing communities. This is the most appropriate strategy for the West of England in effectively delivering the Plan’s spatial priorities.

4.2 The key elements of the strategy and the broad sequence of its formulation are described below.

Existing housing commitments

4.3 58% of the necessary housing land supply is met by existing housing commitments identified by the 4 UAs. This totals around 61,450 homes which leaves about 44,050 new homes to be identified.

Urban living

4.4 The first priority has been to maximise the urban potential in a sustainable and deliverable way, including re-use of brownfield sites where the previous use is no longer required, developing underused sites for residential development where
suitable, reappraising and increasing the development potential and optimising densities on allocated sites, and through estate regeneration. This yields 16,200 new homes leaving around 27,850 to find.

**Small windfall sites**

4.5 The UAs have made an allowance of around 6,800 dgs arising from small windfalls (under 10 dgs). This leaves about 20,990 new homes to be identified.

**‘Non-strategic growth’**

4.6 As referred to in para 3.1, provision is made for ‘non-strategic growth of around 3,400 homes. This will be identified through the UA Local Plans. This leaves about 17,7590 homes to be identified.

**New strategic locations**

4.7 To meet the outstanding need for housing of about 17,590 homes a range of greenfield locations are needed. In line with the spatial priorities, NPPF para 84 and reflecting the Housing White Paper 2017 (see para 3.5 above), the number of new homes which can be delivered at the Strategic Development Locations (SDLs) within the plan period which are outside the Green Belt entail;

- Nailsea (2,575)
- Backwell (700)
- Churchill (2,675)
- Banwell (1,900)
- Charfield (1,200)
- Buckover (1,500)
- Thornbury (500)

4.8 This would yield around 11,050 homes. However, this is insufficient to provide the housing supply needed and consequentially the sub-region would be short by around 6,540 new homes. The scope for adjoining authorities to assist meeting some of the identified need has been explored but no locations are currently offered.

4.9 Therefore, as highlighted in 3.9 above, and having demonstrated that alternatives have been assessed, taking into account the Strategic Priorities, the SA, and the relative impact on the Green Belt there are exceptional circumstances for releasing locations from the Green Belt. The selection of locations must be those which deliver the agreed spatial priorities as reflected in the key principles such as;

- Being well related to Bristol to respond in a sustainable way to scale of need there, particularly on the southern side of the city
- providing for the longer terms needs of Bath in locations which enable sustainable transport access to the city in light of the lack of opportunities for its outward expansion,
- enabling market towns to thrive and grow in a sustainable way,
• locations which have cumulative benefits in infrastructure provision, in that they can both facilitate the provision of new infrastructure as well as addressing existing pressure on existing infrastructure is a key consideration
• need to minimise the impact on the purposes of the Green Belt

4.10 The locations which most suitability help to deliver the Strategic Priorities are;

• Yate (1,000)
• Coalpit Heath (1,800)
• North Keynsham (1,400)
• Whitchurch (1,600)
• Bath Rd, Brislington (750)

4.11 This yields 6,300 additional homes making a total of around 105,500 homes. This, makes provision for the necessary housing supply with flexibility. In doing so, the UAs have sought to minimise the impact on the Green Belt and its general extent remains unchanged, with less than 1% proposed to be removed. There is also scope to extend the Green Belt in appropriate locations through Local Plans.

4.12 The strategy therefore provides a robust supply of deliverable land for housing for the Plan period with a choice of locations and flexibility to respond to changing circumstances. It provides a firm basis for the UAs to demonstrate a 5 year housing land supply in each UA Local Plan, based on the identified Housing Requirement.

4.13 The JSP will be the basis for the UAs to formally allocate the SDLs in their individual Local Plans. Local Plans will set out the detailed site requirements, delivery arrangements and facilitate mitigation and/or enhancements both on site and off site. Local Plan preparation will provide the mechanism to amend local Green Belt boundaries. In the meantime, these locations will remain as part of the Green Belt.

Contingency

4.14 The JSP will be reviewed at 5 year intervals to ensure that the strategy is being delivered and to take into account new evidence. In the event that housing is not being delivered at the levels being planned for, and if there would be no reasonable prospect of the planned delivery being recovered, the Plan identifies some contingency locations to be considered for release through plan review. This contingency comprises;

• Land south of Chipping Sodbury, (around 1,500 dwellings with up to 775 deliverable within the Plan period) and an additional 225 dwellings at North West Yate, South Gloucestershire.
• Land at east Clevedon, North Somerset (around 1,500 dwellings)
• Increased non-strategic growth in South Gloucestershire (around 500 dwellings) and in B&NES (100 dwellings)
4.15 The above narrative describes how the four UAs have formulated the most appropriate spatial strategy for the JSP through planning judgements based on the assessment of evidence and consideration of alternative options. This process is summarised in section 3 and in the Reasoned Justification to Policy 2 of the JSP.
## ANNEX 1: JSP HOUSING LAND SUPPLY

<table>
<thead>
<tr>
<th>COMPONENT</th>
<th>DWELLINGS (Totals Rounded)</th>
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<tbody>
<tr>
<td>Existing Commitments</td>
<td></td>
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<tr>
<td>NSC</td>
<td>13,932</td>
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<td>BCC</td>
<td>17,240</td>
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<tr>
<td>SGC</td>
<td>20,448</td>
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<tr>
<td>B&amp;NES</td>
<td>9,730</td>
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<td>Sub-Total</td>
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<td>Small windfalls post LP</td>
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<tr>
<td>NSC</td>
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<tr>
<td>BCC</td>
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<td>SGC</td>
<td>1,890</td>
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<tr>
<td>B&amp;NES</td>
<td>672</td>
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<tr>
<td>Sun-Total</td>
<td>6,860</td>
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<td>Urban Living</td>
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<td>WsM</td>
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<tr>
<td>Bristol</td>
<td>12,000</td>
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<tr>
<td>Bristol North &amp; East Fringe + Yate</td>
<td>2,900</td>
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<tr>
<td>Bath</td>
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<td>Sub-Total</td>
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<td>Non-strategic growth</td>
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<td>NSC</td>
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<td>BCC</td>
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<td>sub-Total</td>
<td>3,400</td>
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<td>SDLs</td>
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<td>Bath Rd, Brislington</td>
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<td>North Keynsham</td>
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<td>North West Yate</td>
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<td>WOE TOTAL</td>
<td>105,510</td>
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