(K172)

recorded in the JSP Call for Sites Schedule and Mapping documents (Nov 2015) under ref: EN080049.

Previously submitted to contain the suitability and viability of this land for development and this is

been prepared on the basis of Bloor Homes' management plans and assumptions as outlined in our previous letter, Keyham in

interests in a variety of sites and locations across the West of England area. However, this response has

Bloor Homes is one of the largest providers of new homes in England and the West of England, and has

Bloor Homes are part of a consortium of key interested parties that has collaborated to provide a detailed

Introduction/Overview

2015 - Response on behalf of Bloor Homes South West

West of England Joint Spatial Plan - Issues and Options Consultation November

Bloor Homes

Kingswood

Cotleype Close, High Street

Po BOX 299 - Consultation Team

023 8000 2500

West of England Joint Planning Consultation

Delivered by email and post

29 January 2016

01 FEB 2016

South Gloucestershire Council
Consultation Questions

1. Have the most appropriate critical spatial issues been identified in addressing housing and wellbeing; the economy; the environment; and transport?

We agree that housing is a critical issue in the West of England (as set out at Paragraph 2.4 of the Issues and Options document). To address the critical need for affordable homes and support the ambitions for strong economic growth, sufficient new housing to meet the full Objectively Assessed Need of the sub-region should be planned for. The provision of an effective and sound Joint Spatial Plan to guide development is therefore supported, and a robust plan should be put in place as expeditiously as possible.

It is agreed that housing, economy, environment, transport and infrastructure are the most critical spatial planning issues for the West of England.

At Paragraph 2.14 the importance of the West of England Green Belt is discussed. This falls under the ‘Environment’ heading within this section of the document; however, it is important for the JSP to be clear that the Green Belt is not an environmental designation per-se (i.e. it is not a designation made on Environmental quality grounds), rather a spatial planning tool/policy for the control of development. This fact is reinforced by the fact that the Green Belt is not shown on Figure 4 which identifies the environmental assets of the West of England area. A full and robust review of the role of the West of England Green Belt as part of future sustainable development provision is an important part of the JSP process and there should be complete clarity about the ‘environmental’ dimension of this.
6. What needs to happen to ensure the homes we need are built by 2037?

At the heart of the Housing and Economic Plan is the need to deliver 400,000 new homes by 2037, which will help to support the economy and the environment. This means that the Government must work closely with local authorities to ensure that the homes we need are built by 2037.

The Government has set a target of building 400,000 new homes by 2037, and this target needs to be met to ensure that we have the homes we need for the future. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

In order to achieve this target, the Government must work closely with local authorities to ensure that the homes we need are built by 2037. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

The Government has set a target of building 400,000 new homes by 2037, and this target needs to be met to ensure that we have the homes we need for the future. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

In order to achieve this target, the Government must work closely with local authorities to ensure that the homes we need are built by 2037. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

The Government has set a target of building 400,000 new homes by 2037, and this target needs to be met to ensure that we have the homes we need for the future. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

In order to achieve this target, the Government must work closely with local authorities to ensure that the homes we need are built by 2037. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

The Government has set a target of building 400,000 new homes by 2037, and this target needs to be met to ensure that we have the homes we need for the future. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

In order to achieve this target, the Government must work closely with local authorities to ensure that the homes we need are built by 2037. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

The Government has set a target of building 400,000 new homes by 2037, and this target needs to be met to ensure that we have the homes we need for the future. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

In order to achieve this target, the Government must work closely with local authorities to ensure that the homes we need are built by 2037. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

The Government has set a target of building 400,000 new homes by 2037, and this target needs to be met to ensure that we have the homes we need for the future. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.

In order to achieve this target, the Government must work closely with local authorities to ensure that the homes we need are built by 2037. This will require significant investment in new building projects, which will need to be planned and coordinated effectively.
areas for growth on a range of sites that can ensure delivery across the plan period to meet the full objectively assessed need of the West of England. Sufficient flexibility should be included within the JSP to allow the Local Authorities to quickly account for the additional sites required in their development plans.

Once robust development plans are in place the development management process should be efficient and, in accordance with paragraph 15 of the NPPF, ensure that development which is sustainable is approved without delay.

Furthermore development viability should be robustly understood and accounted for in preparing development plan documents, and associated Community Infrastructure Levy charging schedules to enable the homes needed are built promptly.

6. What needs to happen to ensure enough of the homes built are affordable?

As acknowledged at paragraph 3.10 of the JSP Issues and Options Document authorities should consider increasing the amount of total housing to increase the amount of affordable homes delivered.

The response given to question 5 above is also applicable to the delivery of affordable housing.

7. Have we identified the right employment issues?

It is important to identify sufficient new employment land to support the growth of the area, although the need for such land is significantly less than the need for new land for housing. It is also imperative that sufficient housing is delivered to house the necessary workforce to ensure that this supports the economic objectives of the West of England.

8. Where should new employment land be located?

As well as supporting the continued role and function of existing strategically important employment areas, such as the West of England Enterprise Areas, employment land and uses should be located in highly accessible (sustainable) location such as town centres and other areas currently or proposed to be well served by public transport.

9. Is our priority of building more homes in Bristol and our main towns appropriate and how can this approach be achieved?

Within the sub-region it is agreed that the logical location for some growth to be accommodated is Bristol and within other existing urban areas. However, as acknowledged within the Issues and Options Document, there will not be sufficient brownfield sites to meet the required level of housing need.

Although brownfield land has in the past delivered a significant amount of residential development, this source of supply is a finite resource and when planning strategically for the longer term over the plan period sustainable development at the edge of existing towns such as Keynsham should be brought forward. Sites such as that controlled by Bloor Homes at Keynsham are capable of delivering much needed housing in sustainable locations well served by public transport and close to a range of amenities and services, and such greenfield sites should be considered alongside brownfield sites given the acknowledgement that the latter cannot meet the level of demand required.

The ‘urban intensification’ research to be part of the JSP evidence base will need to be thorough and robust to help contribute to a sound overall plan for the area. The potential to provide housing in existing urban areas should not be at the expense of using buildings and land in town centres and other highly accessible locations for employment and other commercial uses.
and good accessibility to sustainable transport choices. Secondary and also the need is for good proximity to

Scenarios 2 and 3 are similar to the focus on development at locations where there is close proximity to existing

range of positive and negative impacts associated with each of the possible scenarios that are considered.

expected to have the most significant impact on the choice of location, and no single option is likely to deliver the best sustainable development outcomes for the West of England. A

page 167)

Preference for the location and access to the market is the most significant influence on the choice of location.

Scenarios 4 and 5 are considered to have significant potential for development in the form of new extensions.

The key themes are the South of Frinton, Lawns, Keyham is considered to have significant potential for development in the form of new extensions.

Do you have comments on the suitability of any of the strategic locations?
that development at a range of scales, from growth at Bristol to town/village expansions enables flexibility in the delivery of housing, particularly in the short term.

14. If a new settlement is a solution, how big should it be and where would you suggest it could go?
No response

15. What transport improvements or measures would be required to support the scenarios?
No response

We hope that this response is of use and look forward to participating in further stages of the plan preparation.

Yours sincerely

[Signature]

Jeff Richards
Director
jeff.richards@turley.co.uk