West of England Joint Planning Consultation
c/o South Gloucestershire Council
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Dear Sir / Madam

WEST OF ENGLAND JOINT SPATIAL PLAN – ISSUES AND OPTIONS CONSULTATION
[NOVEMBER 2015-JANUARY 2016] – RESPONSE ON BEHALF OF BLOOR HOMES SOUTH WEST

Introduction/Overview
Bloor Homes South West [“Bloor Homes”] are part of a consortium of key interested parties that has collaborated to provide a detailed response to the Joint Spatial Plan issues and options, focused on the overall level of development need in the area and the level of housing provision that is required. This combined response includes detailed assessment of the West of England Strategic Housing Market Assessment (SHMA), and other key parts of the emerging evidence base.

Bloor Homes is one of the largest providers of new homes in England and the West of England, and has interests in a variety of sites and locations across the West of England area; however, this response has been prepared on the basis of Bloor Homes’ land interests at Charfield, South Gloucestershire. This separate response is provided on a complementary basis to Bloor Homes’ response as part of the consortium. This site/land was not previously identified as part of the West of England “Call for Sites” exercise in early 2015, as this pre-dated Bloor Homes interest in this land, however a submission has been made to the recent South Gloucestershire Policies Sites and Places DPD consultation and further information can be provided as required. A location plan is shown as Figure 1 below, with the land controlled by Bloor Homes and available for development shown in red.
Consultation Questions

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

Planning for sustainable development, including necessary infrastructure, on a coordinated basis across the West of England is supported as of importance to ensure that sufficient development can be achieved to meet the needs of the area and to ensure that economic potential is optimised. 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. This process is important to a number of West England Local Authorities to ensure that up-to-date Development Plans are provided and maintained.

It is agreed that the most critical spatial planning issues are identified in the document, those being the provision of sufficient homes, the economy, the environment (capacity to accept development and to guide locations, as well as potential for environmental improvement), infrastructure provision and transport.

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.

2. **Is the above vision the most appropriate one for guiding development and growth in the West of England up to 2036? Are there any changes you would like to see to the vision?**

It is agreed that the West of England should, in its vision within this Plan, strive to address the gap between disadvantaged communities and the remaining population and do this through increasing economic prosperity.
Rather than set the target of being ‘fast growing’ in 2036 the vision should aim to ensure high levels of growth during the plan period, i.e. amend to state that, during the period to 2036 the area will have been one of the fastest growing and most prosperous European sub-regions.

Furthermore a commitment to meeting the housing needs of the area should be explicitly included in the Vision. Of the critical spatial issues identified at Paragraphs 2.2-2.19 the vision makes reference to all of these issues but does not clearly set out commitment to delivering homes sufficient to meet the Objectively Assessed Housing Need or to addressing the shortage of affordable homes.

3. Are the above spatial objectives the most appropriate ones for guiding development and growth in the West of England up to 2036? Are there any changes or are there other objectives you would like to see?

Rather than state that the spatial strategy should achieve the objectives, it would be more focused to say that the spatial strategy will meet the stated objectives.

Objective 1 is supported and of critical importance to the success of the JSP. It is essential that the plan meets the full need for market and affordable housing in the area. To better accord with national planning policy this objective might be reworded to state “the full, objectively assessed, need for market and affordable housing….”.

A further objective should be to ensure that the spatial strategy is prepared with flexibility/resilience to change embedded within it, to account for potential changes in circumstances during the plan period and to ensure that the development framework is not so rigid as to stifle future opportunities or innovations.

4. Are we planning for the right number of homes? Is there anything else we should take into consideration regarding the number of homes?

It is essential to identify and plan for the full objectively assessed need for housing and other associated development across the whole West of England area. In this regard the proper (robust) identification of the Housing Market Area(s) and the need for development within it/them is a fundamental building block for the plan. This aspect is covered comprehensively in the separate consortium response provided on behalf of Bloor Homes and others, and includes an assessment of how the Housing Market Areas have been identified and how the OAN has been calculated. The separate Housing and Economic Review concludes that the level of housing proposed is not sufficient to meet the full objectively assessed need for the West of England and indicates that the level of housing planned for should be increased.

5. What needs to happen to ensure the homes we need are built by 2036?

In respect of the West of England JSP it is essential that the following occurs to ensure that sufficient new homes are built by 2036:

- Robust development plans for the whole West of England are put in place and maintained, with these plans providing fully for the objectively assessed development needs of the area;
- Sufficient deliverable development land is identified to facilitate high levels of growth and significant increases in the completion of new homes, alongside job growth;
- Effective and efficient Development Management occurs to remove planning barriers to the effective and timely delivery of homes;
- Development viability is robustly understood and accounted for in preparing development plan documents, and associated Community Infrastructure Levy charging schedules;
There are factors outside of the spatial planning remit of the JSP that will also be important for the delivery of new homes.

6. What needs to happen to ensure enough of the homes built are affordable?
As above it is also essential to plan for a sufficient overall quantum of development to support the provision of ‘affordable housing’ and for there to be flexibility with regard to tenure and other matters.

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 support the economic objectives of the West of England, as part of ensuring that plan making aligns economic and housing growth.

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) locations 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?
It is agreed that the potential of Bristol and other urban areas should be maximised, including for the provision of new homes and jobs to support sustainable development in the area. However it will not be possible to meet all development needs, or even a significant proportion of those needs, in existing urban areas and the provision of greenfield and brownfield land should be approached in a complementary way. Indeed it should be recognised that brownfield land is on the one hand a finite resource, for places to grow to meet the needs and aspirations of communities new land is required, but on the other something which is part of cycle whereby new ‘brownfield’ land will become available as existing buildings and sites become available for redevelopment. It is essential that to meet the needs of the area sufficient land is identified for economic growth to be realised and for sufficient new homes to meet the objectively assessed needs of the area. Whilst brownfield land in urban areas will be an important part of this land supply, which will help to maintain the vitality and vibrancy of existing urban areas and contribute to regeneration where necessary, urban capacity should be clearly and carefully analysed. 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.

10. Have all the reasonable strategic locations been identified? Are there any others we should consider?
It is considered that the reasonable strategic locations have been identified.

Paragraph 5.10 of the consultation identifies that there will be smaller sites [less than 500 dwellings] or combinations of locations which will eventually make a contribution and are important; the JSP process should fully account for all reasonable locations for development. Smaller sites can make a significant contribution overall and these sites and opportunities should not be overlooked.

Paragraph 5.20 of the consultation identifies that new settlements (for which we include significant new development centred around existing rural settlements, such as at Charfield) would be much more likely to create sufficient critical mass to support a strong business case for significant investment in transport improvements, which could include new rail stations and new bus connections. Such proposals would
also enable the associated delivery of other necessary new community infrastructure and co-ordinated provision of services (such as but not limited to healthcare and secondary education facilities and further local retail provision).

11. Do you have comments on the suitability of any of the strategic locations? There is significant potential for sustainable development at and around Charfield, potentially associated with the reintroduction of rail services to/from a station within the centre of the settlement (safeguarded site within adopted Core Strategy). Land controlled by Bloor Homes is available together with other land which has been promoted in the area by others and could enable the delivery of a significant quantum of new development in this area as an expanded “new settlement” focused around the existing village. Potential is already acknowledged for the reintroduction of rail services, via the safeguarded rail station site within the adopted Core Strategy, and significant new development/growth proposals would also enable the associated delivery of other necessary new community infrastructure and services (such as healthcare, secondary education and further local retail provision, for example). This area is otherwise unconstrained by key environmental designations/constraints, such as AONB or Flood Plain, and is outside of the Green Belt meaning that the release of such designated land would not be required in this location.

12. In your opinion, do some strategic locations have advantages or disadvantages in terms of addressing the critical issues identified in Chapter 2? There is significant potential for sustainable development around Charfield, potentially associated with the reintroduction of rail services to/from a station within the centre of the settlement (safeguarded site within adopted Core Strategy). As identified in respect of Question 11 above, land controlled by Bloor Homes is available together with other land which has been promoted in the area by others and could enable the delivery of a significant quantum of new development in this area as an expanded new settlement focused around the existing village of Charfield.

13. Which spatial scenario (or mix of scenarios) is likely to best deliver the plan’s objectives as set out on page 16? No single option is likely to deliver the best sustainable development outcomes for the West of England. A combination of the options is likely to deliver the most sustainable solution, with a need to focus development at Bristol and around Transport links as far as possible, with the release of Green Belt land as required, and the consideration of sustainable new and/or expanded settlements. A wide range of site locations and types should be allowed for to maximise the potential of the housing market to deliver the volume of housing necessary to meet need in the area, and support wider economic objectives. As would be expected the JSP Initial Sustainability Appraisal Report (Nov 2015) identifies a range of positive and negative impacts associated with each of the possible scenarios that are considered.

Whilst Bristol and major transport nodes should be a focus a full range of locations across the WOE area should also be considered to both enable choice and competition and support existing communities.

14. If a new settlement is a solution, how big should it be and where would you suggest it could go? A new settlement might take the form of a completely new ‘town’ away from any existing development, or could also refer to the significant expansion of an existing place to create a ‘new settlement’. Opportunity for the latter exists at Charfield, where the existing village and rail infrastructure (railway and safeguarded station site) could form the basis of sustainable growth in this part of South Gloucestershire. A variety of land is promoted in this area by Bloor Homes and others and there are no significant ‘in principle’ constraints to sustainable development (such as Green Belt, AONB, or severe flood risk). Whilst the consultation document suggests a minimum size of 5,000 new dwellings/jobs for such developments [new
[settlements] this should not be seen as a rigid limit and appropriate testing should consider the way in which (for example) a development of 2,000-3,000 new homes might deliver local infrastructure improvements (particularly transport) that would support growth of this scale in this location (and potentially act as a catalyst to enable further future phases of growth beyond any initial proposal). This testing should form a key part of developing a suitable evidence base for the JSP, building on the relatively limited and generic assessment provided to date in the JSP Issues and Options Transport Study Topic Paper (November 2015).

15. What transport improvements or measures would be required to support the scenarios?
As part of supporting a sustainable “new settlement” (expansion) at Charfield there is potential to introduce new rail services for the area, utilising existing rail infrastructure and providing connections into Yate and Bristol Parkway to the south and Gloucester to the north (as well as the wider rail network and other destinations beyond). In addition new and expanded bus services would also complement public transport availability in the area. Significant funding for new transport infrastructure could be realised as part of significant new development proposals for this location.

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

Yours sincerely

Andrew Ross
Associate Director