REPRESENTATIONS FOR WEST OF ENGLAND JOINT SPATIAL PLAN DOCUMENT

ON BEHALF OF BLOOR HOMES

January 2016
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1.0 INTRODUCTION

1.1 On behalf of Bloor Homes Grass Roots Planning Ltd have been instructed to lodge representations to the emerging West of England Joint Spatial Plan Document: Issues and Options consultation. Bloor Homes are a developer of high quality premium homes with a track record of delivery throughout the UK.

1.2 This document sets out our opinions on the emerging plan and the issues and options for consideration, and promotes a site for future allocation. The statement will answer the questions set out in the consultation response documents and presents technical evidence covering the following points:

- Overarching Issues;
- Options for strategic locations for growth;
- Response to specific questions set out in the consultation document; and
- Potential Site Allocation – Land east of Roundways, Coalpit Heath

1.3 The Joint West of England Spatial Plan aims to set out a prospectus for sustainable growth that will help the area meet its housing and transport needs for the next 20 years; in doing this it will guide the planning strategies of the constituent authorities. Although the Issues and Options Consultation Document makes it clear that no decisions have been made in relation to specific locations for growth, it is important to establish broad directions for development and in particular how sufficient housing will be delivered in the Greater Bristol Area.

1.4 Alongside this statement we have submitted the online consultation form and a redline boundary plan for a site at Roundways, Coalpit Heath. A landscape appraisal is being undertaken by SLR Consulting and its initial conclusions have informed the proposition that this site could accommodate circa 200 dwellings within the next five years and potentially an additional 100 units as part of a later phase. This initial plan has been submitted with this statement and the consultation response form. The final conclusion of this process will inform a concept master plan for the land which will be submitted for consideration in due course.

1.5 We will now set out our representations to the emerging plan and the suitability of our site.
2.1 **OVERARCHING ISSUES**

2.2 The Joint Spatial Plan currently identifies the main critical issues as housing and wellbeing, economy, transport and infrastructure, and environment. We broadly agree with the main themes presented in the Spatial Plan. In particular we support the document setting out that more than 30,000 homes need to be built over and above what is already planned for by each of the constituent unitary authorities. We also support the acknowledgement that this will require a step change in housing delivery over and above past completion rates, to address worsening supply and affordability issues.

2.3 The following strategies and options have been considered as ways in which sufficient development can be delivered in the West of England sub-region:

- Urban Intensification
- Urban Extension
- Town Expansion
- Provision of a New Settlement
- Growth at other Settlements/Locations
- Dispersed Growth

2.4 We will now consider each of these spatial scenarios and their potential implications.

**Spatial Scenario 1: Green Belt Protection**

2.5 The JSP Issues and Options Document identifies that approximately 85,000 homes are needed over the next twenty years up to 2036, approximately 30,000 dwellings over and above what is already planned for by each of the constituent unitary authorities.

2.6 Please see the separate representations made by Barton Willmore Research which sets out our client’s position on this matter. In summary they have significant concerns about the OAN being planned for because the currently selected housing requirements are inadequate due to the following factors:

- Whilst the baseline OAN derived from household projections is not wholly inappropriate adjustments need to be made to account for weaknesses in the population projections and Household Formation Rates (HFRs) underpinning the CLG 2012-based household projections; and

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Land east of Roundways, Coalpit Heath 3
• Taking a demographic led approach alone will mean there is likely to be a significant shortfall in the number of workers to meet the projected job growth that economic forecasters predict will occur in the sub-region, with the recent recessionary period underplaying the influence that factors such as in-migration will have on housing need in the future; and therefore
• Significant numbers of new dwellings are required to underpin future economic growth.

2.7 As a result of these considerations, it is proposed that the full OAN should be 153,440 dwellings (7,672dpa) between 2016 and 2036 for the West of England HMA (including BANES).

2.8 In respect to the spatial scenarios set out in the consultation document we therefore have significant concerns in respect to the way in which scenario 1 is presented. This starts by outlining that:

*The government attaches great importance to Green Belts and boundaries should only be altered in exceptional circumstances.*

2.9 It goes on to mention that such an scenario would increase the reliance on commuting as development would be more remote from Bristol as the primary settlement that will deliver employment growth. The Issues and Options Document also acknowledges that there may not be sufficient brownfield land to meet the housing need required in the Wider Bristol HMA and therefore some Greenfield sites will be needed, for approximately 17,000 homes, as identified in figure 4.1 (page 26). We completely agree with these statements.

2.10 However, what the document does not make clear is that while the NPPF sets out that the protection of the Green Belt is a policy aim the cornerstone of national planning policy is the presumption in favour of sustainable development and the need to foster this in both plan making and decision taking.

2.11 It needs to be borne in mind that the Green Belt relates to only one of the three roles of sustainability, namely the environmental role, and it is not the primary element of this role. In respect to other aspects of sustainable development minimising the need to travel and supporting existing communities where housing need is arising is a much stronger element of the social, environmental and economic roles.

2.12 As previously mentioned we consider that the OAN should be increased to 153,440 dwellings over the next twenty years, as set out in separate representations. We therefore do not agree with the current identified levels of Greenfield land needed set out in figure 4.1 and advocate

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that a more significant proportion of Greenfield land will be needed for the delivery of these homes over and above what has already been identified. This includes land within the Green Belt that is in a sustainable location and would have negligible negative impacts if it were to be developed. Given this pressing need for housing in the Greater Bristol Area, exceptional circumstances exist that warrant a change to the Green Belt boundaries to allow the delivery of housing in sustainable locations.

2.13 Accordingly we do not see spatial scenario 1 as being credible in any way as realistically non-Green Belt areas cannot accommodate the development needs of the region in a sustainable way, it is simply disingenuous to refer to this as a potential option at all.

2.14 Whilst we strongly support the continued function of the Green Belt, the pressing demand for housing in the Greater Bristol Area means a thorough review is needed to potentially remove land that does not support the main purposes as set out in paragraph 80 of the NPPF, which states:

'The Green Belt serves five purposes:
- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

2.15 Bristol and ‘Greater Bristol’ is almost completely landlocked by the Green Belt designation, with the exception of Avonmouth which in itself has flood issues and is not an appropriate location for residential development. Bristol is the key economic driver of this area and housing need is also primarily focused here, and large scale brownfield opportunities within the city have largely been identified for development already. Consequently, sustainably located Green Belt sites that do not perform well in respect to the five criteria set out in paragraph 80 of the NPPF should be released for the development of housing and other uses as appropriate.

2.16 Furthermore by prioritising the protection of the Green Belt over other issues this could lead to unsustainable patterns of development occurring, in locations which cannot be deemed to be accessible, or have limited facilities. This would be in direct conflict with the JSP Spatial Objective 6 of the Issues and Options Document (page 18), which identifies the need to ‘focus new housing and employment which facilitates public transport and active travel methods and limit substantial new housing and employment in locations which would exacerbate unsustainable travel patterns’. 
Consequently land needs to be considered in locations that may be within the Green Belt designation but have higher sustainability credentials which make them more appropriate for development than other non-Green Belt that would be located some way from employment opportunities and key facilities.

2.17 The Joint WoE Partnership undertook a strategic Green Belt assessment in November 2015, seeking to identify and describe any changes to the characteristics of locations within the Green Belt with regard to the main purposes set out in the NPPF. With regard to Coalpit Heath and Winterbourne/Frampton Cotterell, the Green Belt designation surrounds the settlement on all sides – identified as Cell 21 to the east, the Green Belt assessment establishes that the designation here serves purposes 2, 3 and 5, by ensuring that coalescence does not occur between Yate and Coalpit Heath, and safeguarding agricultural land from encroachment (page 23 of the JSP Green Belt Assessment).

2.18 We consider this assertion to be flawed. Firstly, the NPPF seeks to only protect the best and most versatile agricultural land; where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality (paragraph 112). It has already been demonstrated that exceptional circumstances exist within the Greater Bristol Area which justifies the need for housing development on agricultural land. With particular regard to east of Coalpit Heath, some areas were previously used for mining, which does not result in particularly high quality agricultural land and therefore this is predominantly used for grazing and grassland areas.

2.19 Secondly, although physical distance between settlements helps to preserve their identity and prevents coalescence, we would advocate that coalescence tends to relate more to visual inter-linkages rather than actual distance itself. Even through the development of the site at Roundways, Coalpit Heath, there would be a clear delineation between settlements through the location of the proposed open space as set out within the initial landscape plan by SLR Consulting. Extensive planting, open space to the east and smaller scale, low density housing in these areas would ensure that this retains the open feel of the Green Belt. With regard to physical separation there is currently between 2 to 3km of open land between Coalpit Heath and Yate, with the exception of a large solar farm in the centre which is clearly visible from Yate. With the development of the site at Roundways, there would still be at least 2km between the two settlements at the most narrow point which is sufficient for a strategic green infrastructure gap.

2.20 Consequently, the clearly defined gap would still be retained in this instance and as such the purpose of the Green Belt remains.
2.21 Whilst the NPPF sets out that the protection of the Green Belt is a policy aim, the foundation of national planning policy is the presumption in favour of sustainable development, and the need to foster this in both plan making and decision taking. This relates to the encompassing nature of the economic, environmental and social roles of sustainability and how they interrelate with each other, not just Green Belt protection. Accordingly with consideration of the increased need to provide housing in the Greater Bristol Area, we do not see the full retention of the Green Belt to be a potential option at all if the key spatial objectives 1, 2 and 6 are to be met.

**Spatial Scenario 2: Concentration at Bristol urban area**

2.22 Page 4 of the JSP Issues and Options Document sets out the following commitment:

‘To ensure that we effectively shape the future of the area and balance competing demands, we will:

i. Commit to a plan-led approach to guide future development and secure funding for essential infrastructure;

ii. Ensure that strategic planning decisions are made locally in a fair and open way;

iii. Balance the need for growth and development with the need to secure enhanced quality of life and a strong environmental future;

iv. Adopt a sequential approach to the identification of locations of growth that makes the best use of our existing brownfield sites and seeks to unlock more previously developed land before greenfield land is brought into consideration;

v. Ensure emerging transport plans for the West of England are integrated and coordinated with the Joint Spatial Plan’.

2.23 The broad spatial typologies identified for potential growth provides opportunities for urban intensification, which includes additional development within urban areas over and above what is currently planned for in existing development plans.

2.24 Whilst we generally approve of the majority of the strategy, we do not agree with the sequential approach set out in point iv) for a number of reasons. We concur that urban intensification and the redevelopment of brownfield sites for residential or mixed use should be promoted as a priority, but it is clear that within Bristol and South Gloucestershire in particular, further consideration of both Greenfield and Green Belt land is required simultaneously. This is due to brownfield sites largely being allocated in existing development plans or included as part of the housing land supply in some other way. Accordingly there is limited scope for further large scale urban redevelopment opportunities coming forward of a sufficient scale to avoid the need to develop Greenfield and Green Belt land, in order to meet sustainable development objectives.
2.25 Notwithstanding our position that such sites are unlikely to deliver sufficient dwellings, there is also the need to deliver a flexible supply of land. Limiting supply predominately to brownfield and intensification opportunities would mean that downturns in the market could exacerbate supply issues because marginally viable brownfield sites would be the first to be halted in such economic climates. Having a range of size and types of sites will help avoid such severe restrictions on supply. Therefore a mixture of sites and options for growth should therefore be implemented to ensure a wide ranging portfolio, encouraging competition and flexibility in the market which is a key requirement of the NPPF.

2.26 A key priority identified within the Joint WoE Issues and Options Document is the need to deliver affordable homes (paragraph 3.6). However, the continued prioritisation of brownfield land over Greenfield will cause issues of delivery of affordable homes across the West of England. Brownfield and existing sites within urban areas will either have high land purchase prices due to values associated with their lawful use and/or site constraints such as contamination that will make development unviable if policy compliant levels of affordable housing were to be delivered. This is particularly acute within Bristol, where a large level of urban redevelopment schemes that have been permitted have failed to comply with affordable housing policies requirements set out in the Core Strategy because of viability issues associated with constraints that arise from their brownfield nature (contamination and demolition costs etc.).

2.27 Although promotion of brownfield sites should be a priority, protecting the Green Belt for the sake of its’ own protection, which could in turn lead to unsustainable patterns of development forming, does not meet the requirements of the NPPF, in particular paragraph 34 which advocates the need to minimise travel and maximise sustainable transport methods. If the promotion of brownfield sites remains a priority and a singular method by which to induce growth, as a minimum there needs to be a full register of brownfield sites to ascertain the level of availability and to identify what proportion of new homes can come from this type of development. We consider that such a register will simply highlight the acute issues we have identified above.

2.28 Furthermore, in relation to Coalpit Heath, Winterbourne and Frampton Cotterell, the Joint WoE sustainability appraisal (page D26) states that ‘there are few opportunities for developing previously developed land in this area’. This means that overall there are limited development opportunities available in relation to this settlement as little brownfield sites are available and the area is surrounded by Green Belt designation.
2.29 Given its sustainable location and proximity to Greater Bristol, a major employer, development should be promoted at Coalpit Heath and Green Belt sites should be considered in this location also. Although the allocation of non-Green Belt land has been identified as a priority, this may be inappropriate if the location of a site is unsustainable, has limited facilities or is sensitive in landscape/ecological/highways terms.

**Spatial Scenario 3: Transport focussed – proximity to central Bristol and orientation towards public transport**

2.30 Spatial Scenario 3 focuses on transport and seems to have included Yate and Chipping Sodbury for identification of growth in this instance, but misses the conjoined settlements of Winterbourne, Frampton Cotterell and Coalpit Heath, all of which are in closer proximity to Bristol and have good public transport and road links to the city and key employment areas. These links are planned for further improvements as part of the South Gloucestershire Core Strategy.

2.31 The locations identified in the JSP Issues and Options are supposedly meant to perform better in terms of access to sustainable travel choices; however as Bristol, including Aztec West and the Bristol and Bath Science Park, is the major employer for the Greater Bristol Area it should be a priority instead to focus development in locations closer to these areas instead of further away, such as within Coalpit Heath.

**Spatial Scenario 4: A more even spread of development across the sub-region – growth at Bristol, but also other towns and expanded settlements**

2.32 Paragraph 5.8 refers to dispersed growth as being *an aggregate of very small scale opportunities, perhaps across a number of villages*. However, when referring to Spatial Scenario 4 there seems to be a discrepancy in which under table 5.6 refers to a mix of typologies including urban extensions, town expansions or development at other settlements. As stated on page 40, *a greater range of sites is also likely to have housing delivery benefits in terms of providing more variety and choice*. If this idea of dispersed growth refers to the latter summary instead of small scale growth across villages then we largely support this scenario. We understand this is the case but if it is not we reserve our right to change our position as growth limited to small scale opportunities in villages would be wholly inappropriate.

2.33 Out of the range of spatial scenarios indicated within the Issues and Options Document we consider this one to be the most appropriate for a number of reasons:

- This spatial scenario provides the best chance of delivering sufficient land for housing;
• A variety of portfolio of different sites means delivery can better react to changing economic climates;
• Greenfield land can come forward at earlier stages of the plan prior as opposed to more complex brownfield sites; and
• It allows appropriate levels of Green Belt land to be used for development purposes in sustainable locations as opposed to other Greenfield sites that may be in less accessible locations.

2.34 Table 5.6 highlights that different scales of growth can be accommodated to ensure the support of delivery in the West of England, providing opportunities for short term housing need; again we agree with this statement.

2.35 In relation to transport, Table 5.6 indicates that the scenario may be less effective in transport terms, but we would advocate that this may present opportunities and boost investment into certain areas that already have planned transport improvement works, such as the ‘Yate/Chipping Sodbury Package’ at Coalpit Heath within the South Gloucestershire Core Strategy. This would help one of the key priorities of the JSP to integrate and connect transportation improvements across the West of England.

2.36 Furthermore this allows the JSP to respond wholly to the needs of each of the unitary authorities and associated settlements within the West of England and plan appropriately. For example, in Bristol this may require a large urban extension, similar to the Emerson’s Green development, on the east of Bristol. However in South Gloucestershire, it may be more appropriate to consider smaller urban expansions to each of the larger settlements within the unitary authority, such as Coalpit Heath or Yate/Chipping Sodbury or Almondsbury.

2.37 Accordingly, a larger portfolio of different sites and a broad mixture of urban intensification, town expansion and strategic urban extensions ought to be selected, so the market has the best chance to be flexible and ensure delivery, including brownfield and Green Belt sites that are sustainably located. This ensures that sites are based on their merits rather than the protection of the Green Belt for its’ own sake.

Spatial Scenario 5: A New Settlement

2.38 The spatial strategy is yet to identify any potential location for a new settlement and we do not consider it appropriate for the Greater Bristol Area as enough unconstrained land is likely to be available to deliver a new standalone settlement of sufficient size to be sustainable.
2.39 We consider that Bristol is the economic ‘hub’ of the South West and has great levels of connectivity; consequently investment will always be prioritised here and therefore creating a new settlement in a location away from any sort of urban area may induce further levels of out-commuting. Priority should be given to existing urban locations that need transport improvements or already have good transport links to Bristol employment opportunities.
3.0 RESPONSE TO SPECIFIC QUESTIONS

3.1 This statement sets out our comprehensive response to the JSP consultation document; however, we are also aware that specific questions have been asked as part of this process and this section sets out our specific responses to them for clarity. The previous sections of this report provide our response to these questions but in a more holistic way.

3.2 For the avoidance of doubt our specific responses to the consultation questions are as follows:

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

3.3 The consultation document seems to define these well and we strongly agree that the delivery of housing to address the severe affordability issues experienced in the sub-region is one of these. In fact it should be a priority as affordability of housing is also intrinsically linked to the economic prosperity of the sub-region because unaffordable housing and insufficient supply will act as a barrier to people looking to move into the area for work and also discourage existing residents from staying here if housing is not available to meet their changing needs over time.

3.4 We also agree with the intimation that generally the focus should be on supporting existing employment hubs through both the provision of new employment land but also via the delivery of housing that is sustainable located relative to these areas (such as Bristol and Bath city centre, Avonmouth, Aztec West, Bristol and Bath Science Park, etc.).

3.5 The exception to this should be in relation to urban extensions, where their size may allow for the creation of small/medium commercial areas.

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

3.6 Generally we fully support the vision outlined. Our only suggestion would be to the final sentence which we suggest should read:

‘New development will be located and designed to be resilient to, and reduce the impacts of climate change’.
3.7 This is required because one of the most efficient ways of reducing CO2 emissions is to locate development in locations were sustainable travel modes can be maximised and where recreational and social activities are provided in close proximity, meeting the requirements of paragraph 34 of the NPPF.

**Question 3. Are the above spatial objectives the most appropriate ones for guiding development and growth in the West of England up to 2036?**

3.8 Generally we agree with and support the spatial objectives that have been identified, particularly the reference to constituent authorities needing to demonstrate a five year land supply. In respect to this point our recent analysis of many authority’s position on this matter has identified that undersupply often results from not identifying a wider portfolio of sites, including smaller non-strategic sites in varying locations including Greenfield land. We consider that the need for authorities to schedule the release of such sites throughout the plan period, rather than rely on larger sites along should be considered.

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

3.9 Please see the separate representations made by Barton Willmore Research which sets out our client’s position on this matter. In summary they have significant concerns about the OAN being planned for because the currently selected housing requirements are inadequate due to the following factors:

- Whilst the baseline OAN derived from household projections is not wholly inappropriate adjustments need to be made to account for weaknesses in the population projections and Household Formation Rates (HFRs) underpinning the CLG 2012-based household projections; and
- Taking a demographic led approach alone will mean there is likely to be a significant shortfall in the number of workers to meet the projected job growth that economic forecasters predict will occur in the sub-region, with the recent recessionary period underplaying the influence that factors such as in-migration will have on housing need in the future; and therefore
- Significant numbers of new dwellings are required to underpin future economic growth.

3.10 As a result of these considerations, it is proposed that the full OAN should be 153,440 dwellings (7,672dpa) between 2016 and 2036 for the West of England HMA (including BANES).
**Question 5. What needs to happen to ensure the homes we need are built by 2036?**

3.11 In order to ensure delivery comes forward quickly it is essential that a wide portfolio of different sites are selected for development and the spatial strategy should be the first stage in ensuring this happens. By focusing too heavily on brownfield redevelopment, delivery could be delayed because such sites are often complicated and take a significant length of time to be delivered because of constraints such as contamination, and other matters of detail which often arise in constrained urban areas.

3.12 For example, we are currently acting for the redevelopment of Frenchay Hospital and this project identifies that the above issues are often a reality. Firstly, lower numbers of houses than were planned for will come forward as part of reserved matters applications because of site constraints that were not identified at outline stage, in this case approximately 8% less than the outline permission allows for. Secondly, there are significant planning delays associated with the delivery of larger scale brownfield sites, with the original planning application submitted in December 2012 and housing delivery unlikely to occur until the latter part of 2016.

3.13 Therefore the spatial plan must make it clear that each constituent authority needs to deliver a range of sites for development that include brownfield redevelopment for urban intensification, and Greenfield land for urban expansion and extensions.

3.14 Additionally, consideration of the range of size of sites also needs to be given. Often smaller sites can come forward much more quickly than larger scale strategic sites, as they tend not to require new infrastructure or upgrades in this regard. A range of small, medium, and larger sites should therefore be proposed by the constituent authorities, the delivery of which should be staggered throughout the plan period to allow a smoother housing trajectory.

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

3.15 We note the suggestions made in this regard at paragraph 3.11 of the consultation document and do not disagree with any of the suggestions, with the exception of no. 2, which states:

‘Increasing the percentage of affordable housing sought across the HMA – maximising the delivery of affordable homes where sites are viable’.

3.16 Viability has and will continue to be looked at in great detail as part of the development plan making process. We are concerned that this suggestion opens the door to authorities requesting larger percentages of affordable housing on existing sites and schemes that are coming forward
now, which as a result may stall delivery of these homes. The only defence to such a request would be to undertake a viability assessment which must be assessed by independent experts, severely delaying schemes coming forward and further exacerbating acute supply side issue that exist in the housing market.

3.17 We propose that the focus should be on ensuring how currently adopted affordable housing targets are met, and given that market conditions will allow similar levels of affordable housing in the future, selecting sites that are best placed to ensure compliance with these targets. The main issue in respect to delivery of affordable homes is viability; in particular Bristol City has struggled to deliver policy compliant levels because sites within the authority’s boundaries are almost exclusively brownfield opportunities which are costly to develop. Accordingly, we propose that more Greenfield including Green Belt land (as this is the most sustainably located) is allocated for development as it is less likely that a viability case will be presented. The existing land value will be low in comparison to brownfield sites within the urban area where existing values are high. This would be the best strategy to deliver more affordable housing.

**Question 7. Have we identified the right employment issues?**

3.18 We general agree with the issues identified and concur that the need for employment land is not as acute for housing land. However, we would ask the WoE team whether the loss of existing office space to prior notification residential conversion has been factored into the employment land requirements.

3.19 The current assessment being undertaken in respect to the capacity of the existing urban areas to accommodate residential development should also inform employment land supply and demand, as urban intensification is likely to result in the loss of existing sites and premises. This may require further land allocations for modern employment sites to compensate, which may also be most appropriately located within the Green Belt abutting existing employment hubs.

**Question 8. Where should new employment land be located?**

3.20 At the current time the majority of working residents of the WoE area and beyond travel into Bristol City Centre and the key employment area that include Aztec West and Avonmouth. The employment offer of these areas should be reinforced by intensification and if necessary new land allocations. Additionally new employment space has been provided adjacent to Emerson’s Green and as part of other strategic scale sites such as Filton Airfield. As set out, we support the provision of some new urban extensions and new employment uses should be provided as part of this. However, we also support additional housing land in sustainably located settlements such as Coalpit Heath where residents can access existing employment hubs via regular public transport.
transport links. In such locations we do not consider that additional employment land should be allocated but instead accessibility and public transport improvements would be more appropriate to maximise the availability of sustainable modes of transport to existing hubs. The reason for this is that existing hubs need to be supported and providing new employment areas is unlikely to be commercially attractive, other than in urban extensions where an increase in critical mass allows for a sizeable new area to be created.

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

3.21 We consider that in general terms locating development in Bristol and the main towns is appropriate as Bristol in particular offers a wide range of employment opportunities that provide a number of jobs well in excess of its resident employed population. Therefore locating development in such areas is inherently sustainable as travel to work distances will be minimised and the potential to use other modes of transport, other than the private motor car, will be maximised.

3.22 However, locating development in existing settlements that offer day-to-day services themselves and are well connected to Bristol in terms of travel time and the availability of public transport is also a highly sustainable development option. For example, locations such as Frampton Cotterell, Winterbourne and Coalpit Heath offer extensive public transport links into the north fringe of Bristol and in respect to employment hubs such as Aztec West and the Bristol and Bath Science Park, these settlements are better located than in some parts of Bristol City itself.

3.23 As such, this type of development option should also be supported and the emerging document should reflect appropriate levels of development in smaller settlements such as Coalpit Heath, which can be demonstrated as being accessible, and this is an acceptable spatial planning option.

**Question 10. Have all the reasonable strategic locations been identified?**

3.24 The potential strategic locations have been clearly set out and we agree with the range of potential options presented.

**Question 11. Do you have comments on the suitability of any of the strategic locations?**

3.25 As set out in section 4 of this statement we consider that Coalpit Heath, and in particular land to the east of Roundways, Coalpit Heath, to be a suitable site for development. We consider that an urban expansion of this settlement to be appropriate as the areas has a great number of
everyday facilities and services, as well as good access to major employment opportunities within the north and east of Bristol, at places such as Aztec West and the Bristol and Bath Science Park.

3.26 We consider that urban expansions to smaller settlements, such as Yate/Chipping Sodbury, Charfield or Coalpit Heath are appropriate for growth and in particular housing developments due to the existing and proposed transportation improvement links to these areas.

**Question 12. In your opinion, do some strategic locations have advantages or disadvantages in terms of addressing the critical issues identified in Chapter 2?**

3.27 Please refer to section 2 of this statement for broad overarching issues, however for completeness some of the key points are reiterated here:

- It is our opinion that merely identifying non-Greenbelt sites for development may result in unsustainable patterns of development occurring, in areas that are not particularly accessible in terms of public transport or they may be highly sensitive in economic, landscape, highways, archaeology or other material terms;
- Furthermore whilst prioritising urban intensification is a key priority, it should not be the only priority. There is limited scope for new redevelopment opportunities within the existing settlement boundaries as a large number of these have already been allocated for development. Therefore there needs to be a mixed portfolio of strategic locations and allocated sites in order to meet the short and long term demand as set out in the Issues and Options Document; and
- The creation of a new settlement is inappropriate in this instance as investment will continue to be focused within Bristol and there will be little commercial interest in this avenue. Furthermore no credible land options for a new settlement has been presented.

**Question 13. Which spatial scenario (or mix of scenarios) is likely to best deliver the plan’s objectives as set out on page 16?**

3.28 As identified in section 2 of this statement, we consider that a mixture of an urban extension, and smaller urban expansions (i.e. a disperse of growth across the West of England), including a mixture of brownfield and greenfield sites, would be the most appropriate way to meet housing need and ensure choice and completion within the market.

3.29 In particular, we consider Coalpit Heath, which is suitable in terms of accessibility, is suitable for development as residents here have a short travel time to key employment locations, can access
public transport modes and can meet their everyday needs and this reduces reliance on the private motor car.

3.30 In respect to the spatial scenarios set out in the consultation document we have significant concerns in respect to the way in which scenario 1 is presented. This starts by outlining that:

_The government attaches great importance to Green Belts and boundaries should only be altered in exceptional circumstances._

3.31 It goes on to mention that such a scenario would increase the reliance on commuting as development would be more remote from Bristol as the primary settlement that will deliver employment growth. We completely agree with this. However, what is does not make clear is that whilst the NPPF sets out that protection of the Green Belt is a policy aim, the cornerstone of national planning policy is the presumption in favour of sustainable development and the need to foster this in both plan making and decision taking.

3.32 It needs to be borne in mind that the protection of the Green Belt relates to only one of the three roles of sustainability, namely the environmental role, and it is not the only element within this role. In respect to other aspects of sustainable development, such as minimising the need to travel and supporting existing communities where housing need is arising, is a stronger element of the social, environmental and economic roles. Accordingly, we do not see spatial scenario 1 as being credible in any way as realistically non-Green Belt areas cannot accommodate the development needs of the region in a sustainable way. It is simply disingenuous to refer to this as a potential option in any way and it should be removed from the discussion.

_**Question 14. If a new settlement is a solution, how big should it be and where would you suggest it could go?**_

3.33 As we have set out, we do not consider there is scope within the WoE area to accommodate such a development. The other spatial development options we have set out above would be a preferable way of delivering growth.

_**Question 15. What transport improvements or measures would be required to support the scenarios?**_

3.34 Coalpit Heath is subject to policy T.7 of the South Gloucestershire Core Strategy, which is part of the proposed transport improvements links within the ‘Yate/Chipping Sodbury package’. Consequently any proposed transport improvements suggested in the JSP should relate to improving accessibility to job opportunities and other facilities in nearby areas, including at Aztec
Land east of Roundways, Coalpit Heath

West and the Bristol and Bath Science Park. This will ensure that the different roles of the presumption in favour of sustainable development are met and complies with paragraph 34 of the NPPF, which maximises the use of sustainable transport modes.
4.0 **COALPIT HEATH**

4.1 As we have established it is our opinion that the WoE JSP will need to consider sites within the Green Belt in sustainable locations and those which have few constraints identified such as flooding, ecology, landscape, heritage or highways.

4.2 There are a number of key everyday facilities and services within Coalpit Heath including a GP Practice, post office, football club, churches, meeting venues and a youth centre, two primary schools, and several small businesses including a public house, a local convenience store and a Sainsbury’s Local which recently opened in August 2015. There are established bus routes within the area but Coalpit Heath is also subject to policy T7 – Strategic Transport Infrastructure of South Gloucestershire’s Core Strategy which identifies proposed improvement works within the ‘Yate/Chipping Sodbury Package’. This includes improving stopping facilities and increasing frequency on direct bus services, as well as integrating cycling routes between settlements into the wider Cycling City network. In particular this includes improvements to the Dramway which could be facilitated by development on this site through contributions to infrastructure.

4.3 The West of England JSP team recently published a Sustainability Appraisal as part of their technical evidence in November 2015. The relevant extract in respect to Coalpit Heath is shown below in table 1:

<table>
<thead>
<tr>
<th>Coalpit Heath JSP SA Objectives</th>
<th>Positive/Negative/No Discernible Effect/Uncertain Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a. Achieve reasonable access to public open space</td>
<td>+</td>
</tr>
<tr>
<td>1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality</td>
<td>+</td>
</tr>
<tr>
<td>1c. Achieve reasonable access to healthcare facilities</td>
<td>+</td>
</tr>
<tr>
<td>2a. Deliver a suitable quantum of high quality housing for the West of England sub-region</td>
<td>++</td>
</tr>
<tr>
<td>2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region</td>
<td>++</td>
</tr>
<tr>
<td>2c. Achieve reasonable access to community facilities</td>
<td>+</td>
</tr>
<tr>
<td>2d. Achieve reasonable access to educational facilities</td>
<td>++/?</td>
</tr>
<tr>
<td>2e. Achieve reasonable access to town centre services and facilities</td>
<td>-</td>
</tr>
<tr>
<td>2f. Reduce poverty and income inequality, and improve life changes of those living in areas of concentrated disadvantage</td>
<td>0</td>
</tr>
<tr>
<td>3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region</td>
<td>-</td>
</tr>
<tr>
<td>3b. Achieve reasonable access to major employment areas</td>
<td>+</td>
</tr>
<tr>
<td>4a. Minimise impact on and where possible enhance the historic environment, heritage assets and their settings</td>
<td>?</td>
</tr>
</tbody>
</table>
4b. Minimise impact on and where possible enhance habitats and species  
4c. Minimise impact on and where appropriate enhance valued landscapes  
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land  
4e. Minimise the loss of productive land, especially best and most versatile agricultural land  
4f. Minimise vulnerability to tidal/fluvial flooding, without increasing flood risk elsewhere  
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere  
4h. Minimise harm to, and where possible improve, water quality and availability  
5a. Achieve reasonable access to sustainable transportation  
5b. Reduce non-renewable energy consumption and ‘greenhouse’ emissions, and provide opportunities to link into existing heat networks  

Table 1. Extract of the Sustainability Appraisal Published by WoE JSP

4.4 This evidence has resulted in the outcome that suggests that Coalpit Heath is not particularly accessible, in relation to sustainable transport methods and employment opportunities. We do not agree with this assertion. Furthermore in relation to the site itself, a number of criteria which were considered to have potential ‘negative’ or ‘uncertain’ effects can be removed; for example land east of Roundways, Coalpit Heath does not lie within the flood zone, is not part of the best and most versatile farmland, is close to a large number of everyday facilities and services such as local primary schools and a local Sainsbury’s, and would have no negative impact upon listed buildings nearby, such as Rose Oak Farmhouse which is largely obscured by other outbuildings.

4.5 Furthermore the Rural Settlements and Villages 2015 Topic Paper published in November 2015 by South Gloucestershire Council identifies the accessibility of different settlements to key services and facilities within the District. This identified that Coalpit Heath indicated a score of 28/40 (shown below in figure 1), which in conjunction with its neighbouring settlements Winterbourne (34/40) and Frampton Cotterell (31/40) it is clear that SGC consider Coalpit Heath to be a suitable location for development and in particular housing. Excluding Yate and Thornbury, which are established settlements of a much larger size, Coalpit Heath in conjunction with Winterbourne and Frampton Cotterell scored more highly than the majority of other settlements within the table. Coalpit Heath is considered to be ‘relatively accessible’ and it was indicated in this paper that sites within and outside of the Green Belt should be considered for development (page 31). This technical study has been undertaken by the relevant local planning authority and considers planned transportation improvements to the local area, and as a result the findings of this topic paper should take precedence over a very broad sustainability appraisal.
Given the high accessibility of Coalpit Heath and the identified need to plan for 30,000 more dwellings between the unitary authorities according to the West of England Issues and Options Document, exceptional circumstances exist to justify the utilisation of Green Belt land. By allocating appropriate smaller sites within the Green Belt this removes the potential of development occurring in unsustainable locations by virtue of inaccessibility. Therefore we propose that Green Belt land adjacent to Coalpit Heath needs to be assessed in respect to its capacity to accommodate development, as small/medium scale sites here would provide homes in a sustainable location, where demand will be high given the settlement’s accessibility to a range of employment opportunities available in both Yate and Bristol.

Figure 1. Sustainable Access to Key Services and Facilities – Village and Settlement Scores
Land east of Roundways, Coalpit Heath

4.7 Bloor Homes hold an option in respect to land east of Roundways at Coalpit Heath. This land is identified on the site location plan (Ref. 334 A4 060116 Site Location Plan) which is contained as appendix A to this document.

4.8 The site itself lies to the east of Roundways road and south of Woodside Road and comprises agricultural land bound by the railway line to the south, and intersected with some Public Rights of Way with further open fields to the east.

4.9 The initial landscaping plan undertaken by SLR Consulting (see appendix B), identifies that there is approximately 15 hectares of developable land on site. Through detailed technical assessments other constraints may be identified and as a result the level of built development is likely to be reduced in later plans in response to matters such as previous coal workings, drainage requirements and community infrastructure requirements. Given the edge of settlement location, it is identified that approximately 300 dwellings could be accommodated here in conjunction with public open space or other community infrastructure that may be required.

4.10 Considering the ease by which access could be provided into the site, and the fact that the site is already under option, it is considered that these dwellings could easily be delivered within the first five years of the plan period, boosting short term supply, a key requirement of the NPPF.

4.11 The site at Roundways is highly accessible with some employment opportunities within the area of Coalpit Heath but larger scale employment opportunities are situated nearby within the northern and eastern fringes of Bristol to the west and Yate to the east. This is considered to be highly accessible to Coalpit Heath and this site and these links will improve further once planning public transport works are completed, as set out in South Gloucestershire Council’s Core Strategy. Point v) of the Commitment Statement set out within the Joint WoE Issues and Options Document makes is clear that emerging transport plans for the West of England should be integrated and coordinated into the Joint Spatial Plan, and therefore strategies to improve connectivity with the Greater Bristol Area in our view should be supported and encourage growth through development (i.e. urban expansion and extension).

4.12 There is a secondary school in Winterbourne (Winterbourne International Academy) approximately 4.5km away from the site, as well as several primary schools within Coalpit Heath.
itself. Table 2 below demonstrates the proximity of key everyday facilities and services to the site.

<table>
<thead>
<tr>
<th>Key Facility</th>
<th>Approximate Distance (m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coalpit Heath Pre-School</td>
<td>520m</td>
</tr>
<tr>
<td>The Manor C of E Primary School</td>
<td>350m</td>
</tr>
<tr>
<td>St. Saviour’s Church</td>
<td>425m</td>
</tr>
<tr>
<td>Post Office</td>
<td>670m</td>
</tr>
<tr>
<td>Village Hall</td>
<td>555m</td>
</tr>
<tr>
<td>Bus Stops on Badminton Road (E)</td>
<td>430m</td>
</tr>
<tr>
<td>Bus Stops on Badminton Road (W)</td>
<td>470m</td>
</tr>
<tr>
<td>Sainsbury’s Local</td>
<td>890m</td>
</tr>
<tr>
<td>Ring of Bells (PH)</td>
<td>370m</td>
</tr>
<tr>
<td>Badminton Arms (PH)</td>
<td>860m</td>
</tr>
<tr>
<td>Watermore Primary School</td>
<td>1,000m</td>
</tr>
<tr>
<td>Zion United Church</td>
<td>1,020m</td>
</tr>
<tr>
<td>Frampton Athletic Football Club</td>
<td>1,300m</td>
</tr>
<tr>
<td>Nisa Convenience Store</td>
<td>800m</td>
</tr>
<tr>
<td>ATM Machine</td>
<td>800m</td>
</tr>
<tr>
<td>Recreation Ground</td>
<td>300m</td>
</tr>
<tr>
<td>Play area on Beesmoor Road</td>
<td>995m</td>
</tr>
</tbody>
</table>

Table 2. Proximity to everyday facilities and services

4.13 The Manual for Streets states:

‘Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km’.

4.14 It is considered that the majority of key facilities lie within the ideal distance of 800m of the site and all within the maximum distance below which car trips are likely to be replaced by walking or cycling. Accordingly we consider that it is evident that the site is highly accessible, and in those terms sustainable.

4.15 The site is not designated within a flood zone, nor within an SSSI, Conservation Area, AONB, SNCI, Air Quality Management Area or otherwise. Therefore the site is unconstrained apart from its Green Belt designation.

4.16 As landscape considerations are intrinsically linked to Green Belt designations SLR Consulting have been instructed to undertake an initial landscape appraisal to identify constraints and opportunities for development of the site and there initial findings are included as appendix B to
this document, this assessment work is ongoing. This process will inform a detailed master plan for the site in due course. So far this assessment has identified that:

- The Dramway long distance path runs through the southern part of the site;
- A substantial public rights of way network runs within and around the site;
- The site lies within the Green Belt;
- Adjacent to the north-western corner of the site lies Rose Oak Farmhouse, a grade II listed building, and the site has the potential to contribute to its setting;
- There is locally high ground within the centre of the site;
- Views of the site currently exist from residents particularly along Roundways and from other areas within Coalpit Heath; and
- As a result, a net developable area of approximately 11 hectares is achievable for the site, equivalent of a total of circa 300 homes.

4.17 We are aware that there is non-Green Belt land to the south of Coalpit Heath, which comprises land known as Woodlands Farm. This land has been subject to a previous application for 380 dwellings which was refused, predominately for landscape reasons. We have visited this site and consider that it does offer a relatively high landscape value, something that the site at Roundways does not. This underlines that the current sequential approach to site selection, identified in point iv) of the Issues and Options Document which favours non-Green Belt sites, is not necessarily appropriate as it is our case that when comparing both of these sites developing the non-Green Belt site would result in a greater landscape impact than the alternative of developing Green Belt land at Roundways.

4.18 Accordingly land to the east of Roundways road is a suitable site for development of circa 300 homes, with delivery occurring in the first five years as no major infrastructure would be required here. There is also potential for later phases of development to deliver further housing. The site is in a highly accessible location with a large number of everyday facilities in close proximity and there are no major physical constraints to development such as ecology, highways, other infrastructure, or archaeology to prevent the delivery of homes in this location. Landscape considerations will be robustly addressed by SLR Consulting to ensure that any potential impacts would either be negligible or in fact beneficial to the area in this regard.
5.0 **CONCLUSION**

5.1 As we have set out whilst we consider that the West of England Issues and Options Document has identified all the possible options for strategic locations of growth, the prioritisation of brownfield land and urban intensification remains an issue and will potentially prevent the delivery of sufficient numbers of homes within the Greater Bristol Area.

5.2 At present we consider that a broad range of strategic locations, including the option for delivery of both brownfield and Greenfield sites including Green Belt land, should be allocated or safeguarded for development to meet the requirements of the NPPF ensuring choice and competition in the market. Without the urban expansion or extension of some key settlements identified in the JSP the West of England will be unable to meet the additional 30,000 homes which have been identified which are over and above what has already been planned. Furthermore it is our assertion, as set out in separate representations made by Barton Willmore Research, that the current OAN figure should be increased to 153,440 dwellings over the next twenty years. Consequently it is clear that Spatial Scenario 1, the protection of Green Belt land, is not a credible nor practical option and will lead to unsustainable patterns of development forming, or stall the delivery of much needed homes across the Greater Bristol Area.

5.3 The scope for urban intensification is limited as the majority of these sites have already been planned or allocated for, and consequently as a minimum we suggest that if the WoE JSP continues to prioritise this type of development a list of available and developable brownfield sites need to be compiled to ascertain what proportion of housing is available from this land. This is likely to underline our assertion that insufficient housing supply, and in particular affordable housing, would be delivered by this means.

5.4 However, we consider that development for housing in the Green Belt should be considered, on sites which are in sustainable locations adjacent to the settlement boundary and are less sensitive in landscape, ecological, highways or commercial terms.

5.5 We would advocate that Coalpit Heath, as a sustainable settlement, should be considered for urban expansion and in particular land east of Roundways, within the Green Belt should be allocated. The site is immediately deliverable subject to planning permission by a housebuilder that has a track record for delivering homes, and has limited constraints that can be easily mitigated and offers opportunities for enhancement in respect to public access, biodiversity and place making. No adverse effects have so far been identified on the site which would outweigh the benefits of development here.
5.6 By simultaneously considering Greenfield land including areas within the Green Belt alongside brownfield land, a broad range of strategic locations can be identified for growth that responds to each authority’s needs. For example the east of Bristol may require an urban extension to meet growing demand, whereas in settlements such as Yate, Charfield of Coalpit Heath it may be more appropriate to consider smaller scale urban expansion which improves connectivity to the wider Bristol area. Accordingly, by considering dispersed growth across the sub-region, the JSP will be found to be sound and will provide a document which is genuinely plan-led and meets the requirements of the NPPF.
APPENDIX A – SITE LOCATION PLAN, LAND AT ROUNDWAYS COALPIT HEATH
APPENDIX B – LANDSCAPE AND VISUAL OPPORTUNITIES PLAN AND LANDSCAPE APPRAISAL
1.0 BRIEF

1.1 SLR Consulting Ltd have been appointed by Bloor Homes to provide written representations for land on the eastern edge of Coalpit Heath, South Gloucestershire, in order to promote the site through the South Gloucestershire Policies, Sites and Places Plan, and through the West of England Joint Spatial Plan.

2.0 METHODOLOGY

2.1 An initial data trawl was undertaken as follows:

- MAGIC search to check for any landscape related designations, including, Scheduled Monuments and Listed Buildings. The extent of the Green Belt was also checked;
- South Gloucestershire District Council, Local Plan Proposals Map for any landscape designations; and
- Published sources of landscape character.

2.2 A site visit was made on 5th January 2016 during good weather conditions and clear visibility. The site was viewed from public rights of way crossing the site and from surrounding roads.

3.0 LANDSCAPE AND VISUAL APPRAISAL

Site Description

3.1 The site comprises ten agricultural fields of varying sizes on the eastern edge of Coalpit Heath. The topography is complex, often gently undulating with locally high ground situated within the centre of the site.

3.2 The tranquillity of the site is influenced by the background noise of the M4/M5 motorways and the South Wales Main Line railway.

3.3 Within the western part of the site, the remains of a coal pit are visible as a small earth mound, demonstrating the previous uses associated with the area. An appropriate heritage assessment is recommended.

3.4 The site is irregular in its shape and is bounded:
• to the north by a field boundary hedgerow which surrounds Rose Oak Farm House, grade II listed building and its associated curtilage, before following Woodside Road. Agricultural fields are located beyond and extend extensively northwards;
• to the east by a tree lined hedgerow which surrounds a regular field associated with Froglane Farm before continuing southwards along a tree belt extended from a small woodland;
• to the south by a woodland belt including Scots Pine trees, which line an embankment adjacent to the South Wales Main Line railway. Ram Hill Colliery and Dramway scheduled monument and sporadic dwellings are located beyond; and
• to the west by a hedgerow aligned sporadically with trees, abutting Roundways, with existing housing and a primary school within Coalpit Heath situated beyond.

Planning and Landscape Designations

3.5 The site and areas immediately adjoining it to the north, east and south lie within the Green Belt. Rose Oak Farm House grade II listed building and its associated curtilage abuts the north western corner of the site. Ram Hill Colliery and Dramway scheduled monument lies to the south of the site, to the other side of the railway.

3.6 The Dramway (Long Distance Footpath) crosses the site eastwards from Roundways before heading southwards towards the scheduled monument. Three other public rights of way cross the site.

Landscape Character

3.7 The site lies within the Natural England, 118: Bristol, Avon Valleys and Ridge, National Character Area Profile and the South Gloucestershire Landscape Character Assessment Area 8, the Yate Vale landscape character area. These provide further information on the landscape character of the surrounding area.

Visual Appraisal

3.8 Views from and to the site look across an undulating landscape, with clusters of buildings, hedgerow boundaries, trees and larger scale features such as pylons visible in views. Built form within Coalpit Heath limits views from the west. Due to the nature of the topography, there are opportunities for views of the surrounding area from the site:

• To the north there are long distance views looking across the landscape towards the Cotswold Escarpment, with evidence of urban influences such as pylons and development;
• To the north-east views include larger scale man-made influences with a solar farm and industrial built form; and
• To the west and south-west looking over Coalpit Heath towards the north of Bristol, with the Purden BT Tower clearly visible on the horizon.

3.9 Views are limited to the south-east due to a buffer of trees providing a sense of enclosure to the site.

4.0 OPPORTUNITIES AND CONSTRAINTS

4.1 The principal landscape and visual opportunities of the site for development are
addressed by the following:

- The site has the ability to absorb development, ideally focused in the western areas of the site occupying lower ground but also within the north-easterly parts of the site, in order to limit adverse visual effects from the surrounding landscape;

- Public rights of way can be retained with development only having a minimal impact on their setting;

- Opportunity to provide vehicular access either from Roundways Road, with no or minimal impact on existing hedgerows and trees; and

- There is an opportunity to provide additional tree planting within the site, particularly to enhance the group of existing trees situated within the north eastern area of the site, to provide a small woodland which would reflect the wider setting to the east of the site, as well as to strengthen boundaries and provide visual filtering in views.

4.2 The principal landscape and visual constraints of the site for development are addressed by the following:

- There is evidence that the site is a popular dog walking area for the local community and is a well-used resource;

- There are views from the site over surrounding countryside, including those towards the Cotswold Escarpment to the north of the site;

- Along the footpath running north-south across the site, there are no views of Coalpit Heath due to the topography, with only a limited amount of built development visible to the north east, contributing towards a semi-rural setting for the user, all be it with man-made influences;

- There are pleasant views from outside the site, including those that look towards local high ground within the centre of the site and those that look towards the belt of pine trees along the southern boundary of the site which form an attractive landscape feature, benefiting local residents in proximity to the site;

- The buffer of trees along the eastern and southern boundary which include the belt of pine trees, should be retained as they provide some visual enclosure to the site;

- Hedgerows and trees within the site should be retained where feasible in order to keep the field pattern of the site; and

- Rose Oak Farm House, grade II listed building and its associated curtilage border the north western corner of the site, therefore it is important that development respects its setting.

5.0 CONCLUSIONS

5.1 The potential development areas, from a landscape and visual perspective, are shown on the accompanying opportunities and constraints plan.
5.2 Development should be primarily focused within the western part of the site, but is also suitable in the north-easterly area. This would appear as a logical extension to the east of Coalpit Heath and would be seen within the context of the existing settlement.
COALPIT HEATH

Potential developable area
Potential tree planting
Potential open space
Important views looking into site
Important views looking out of site
Potential access points
Potential road connections
Dramway long distance footpath
Public rights of way
Pine trees to be retained
Enhancement of existing hedgerow through additional planting
Existing contours

Legend:

- Site boundary (within green belt)
- Potential developable area
- Potential tree planting
- Potential open space
- Important views looking into site
- Important views looking out of site
- Potential access points
- Potential road connections
- Dramway long distance footpath
- Public rights of way
- Pine trees to be retained
- Enhancement of existing hedgerow through additional planting
- Existing contours

COALPIT HEATH

Development offset to respect Dramway

Rose Oak Farm House (Grade II listed)

Distant views towards Cotswold Escarpment

Local views to local high ground

Area retained as open countryside

Local views to pine trees

High ground prevents views of Coalpit Heath from this area

Ram Hill Colliery and Dramway Scheduled Monument

Existing Solar Farm

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS,
AGI, Getmapping, Aerogrid, IGN, IGF, swisstopo, and the GIS User Community

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