Representations to the West of England Joint Spatial Plan
Issues and Options

Hicks Gate
Representations submitted on behalf of Crest Strategic Projects and Key Properties Ltd

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1.0 Introduction

1.1 Alder King Planning Consultants have been instructed by our clients, Crest Strategic Projects and Key Properties Limited to make representations to the West of England Joint Spatial Plan (JSP) Issues and Options consultation. This representation is made for the promotion of land at Hicks Gate for development, and provides a response to the consultation questions 1 to 13 respectively. The main commentary on the merits of Hicks Gate urban extension as a sustainable option for housing growth is provided in the response to Question 11.

1.2 The JSP is being prepared by the West of England Unitary Authorities (UAs) of Bristol City Council (BCC), Bath and North East Somerset Council (BANES), North Somerset Council and South Gloucestershire Council. The UAs have joined forces to plan strategically for the future development needs of the sub-region through the preparation of the plan, which will cover the period of 2016 to 2036. The plan will provide the statutory basis by which local plans within the four authorities will be produced. The overall purpose of the JSP is to identify:

- the housing land requirements for the wider Bristol Housing Market Area (HMA) that will need to be met across the West of England;
- the employment land required in the West of England Functional Economic Market Area (FEMA);
- the most appropriate locations for the housing and employment growth needed; and
- establish what transport improvements and other infrastructure investment will need to be made in the plan area to support sustainable growth.

1.3 We are highly supportive of the JSP and look forward to working with the UAs to achieve the aspirations of the plan. However, we are disappointed to see the leaders’ statements in the foreword to be discouraging in relation to the Green Belt; there is a recurring theme through the statements that emphasises the need to protect the Green Belt. For all that is positive both in terms of the tone of the Issues Paper and options for spatial distribution, there is a danger that it is undervalued by the political statements made by the Leaders. The JSP represents a unique and long overdue opportunity to plan strategically across boundaries to ensure the most logical forms of sustainable development are achieved. If the political undertone remains a dogged determination that the Green Belt must be protected ‘at all costs’ then it is a deeply unhelpful sentiment in which to start the JSP journey. Time will tell how much leverage the political sentiment has in the process but it is undoubtedly an unhelpful foreword to an otherwise positive context.

1.4 We acknowledge that a Green Belt Assessment paper has been prepared. This is a useful first step but offers little meaningful assistance in identifying sustainable locations for growth. Whilst it is appreciated that it is not its purpose, it stands to reason that the most sustainable locations for growth outside of the Bristol urban area (ie its periphery) will tend to conflict most with Green Belt objectives. We stress that in our view this should not be the key consideration in identifying locations for growth and has in our view little relevance to the spatial distribution process.

1.5 The Issues and Options consultation is the first stage in preparing the JSP. At this stage, no decisions have been made on the future locations for growth and development. This consultation exercise will feed into the preparation of a draft plan in summer 2016. Two more rounds of consultation will subsequently be undertaken, with submission of the final plan to the Secretary of State timetabled for summer 2017. We are encouraged by the aspirations of the UAs to timetable reviews of the Core Strategies to coincide with the emerging JSP proposals in order to achieve meaningful delivery at the earliest practicable opportunity.
Question 1. Have the most appropriate critical spatial issues been identified in addressing housing and wellbeing; the economy; the environment; and transport?

2.1 Chapter 2 of the Issues and Options consultation document presents a comprehensive high level summary of the critical spatial issues faced in the West of England.

General Commentary

2.2 We concur with the view in paragraph 2.4 that there is a "significant and increasing need for housing in the wider Bristol HMA". This is especially true given the assertion in paragraph 2.7 that the existing key employment areas, are likely to continue to be the most significant locations for boosting economic growth and for successful future job generation.

2.3 Whilst we generally agree with the statement in paragraph 2.14 that the Bristol-Bath Green Belt has and should continue to have a significant role to play in maintaining the open countryside, since 48% of the sub-region currently falls within the Green Belt, coupled with the increasing need for housing, some areas of the Green Belt will need to be released in appropriate locations in order to facilitate development. A critical spatial issue is the need to carefully consider the extent of Green Belt and ensure that it is robustly reviewed. Further commentary on the Green Belt is provided in response to Question 13.

Affordable housing policy changes

2.4 Paragraph 2.4 identifies the increasing need for housing, and particularly for affordable homes. What must be considered through the preparation of the JSP is the emerging policy in terms of the broadening definition of affordable housing to include starter homes. At present policy guidance confirms that "low cost market" housing may not be considered as affordable housing for planning purposes. However, the definition of affordable housing is shifting. At the Conservative Party conference in March 2015 it was announced that starter homes will be able to be counted as “affordable housing” for planning purposes. In October 2015 the Government went further to say that councils would no longer be able to insist on affordable rented housing, as opposed to starter homes in planning agreements. The Autumn Statement 2015 further supported this notion.

2.5 Subsequently, the Housing and Planning Bill was presented to parliament in October 2015. The Bill has passed through the House of Commons and is now being considered in the House of Lords, approaching its second reading. It is expected to achieve Royal Assent in April 2016. The Bill dedicates an entire chapter to promote the supply of starter homes in England. There are two main duties in this chapter: a general duty to promote the supply of starter homes when planning functions are being carried out, and a specific duty in relation to decisions on planning applications.

2.6 At this stage it is difficult to understand what the implications of future policy changes will be. The Strategic Housing Market Assessment (SHMA) evidence base to inform the JSP was published in July 2015. This has understandably not considered the need for the provision of starter homes as it is not currently policy. However, we would expect a review mechanism to be in place to update the SHMA should policy changes emerge during the process of preparing the JSP but that immediate consideration be given to its implications on need, supply and demand.

2.7 The principal reason why there is a shortfall in affordable housing is because there has historically been a major undersupply in open market housing generally. This issue will be exacerbated unless open market housing is provided in greater numbers and the consultation document does not recognise 'open market need'.
Question 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?

3.1 Alder King Planning Consultants are very much in support of the JSP and the positive vision that has been prepared by the UAs. The JSP is certainly the correct delivery vehicle to guide development and growth across the West of England. The joined up approach between the four UAs is fundamental to the sustainable delivery of development. We are encouraged by the timetable that has been presented in the Issues and Options document.

3.2 It is important though that the vision recognises the need for the provision of development, most notably housing, to meet the needs of current and future generations.

Question 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 any other objectives you would like to see?

4.1 The spatial objectives presented are predominantly sufficient. Objective 10 is to 'maximise the use of brownfield land & minimise the use of greenfield land'. This objective is the correct approach and is national and local policy compliant, however it is clear that development on greenfield land is unavoidable as part of the plan. At least 17,000 homes are identified on greenfield land in the JSP. Housing numbers could very well increase and any additional housing will need to be accommodated on greenfield/Green Belt sites. Only 12,000 homes can be accommodated through urban intensification and it is therefore self-evident that insufficient supply exists from this source alone.

4.2 We would not support any phasing restrictions that would require the brownfield land is developed prior to the greenfield land. Ultimately, the numbers will need to be delivered up to 2036; there should be no doubt that the greenfield sites are necessary to be brought forward early to ensure appropriate infrastructure is secured to support development. Delays to infrastructure investment could cause delays to the delivery of housing numbers at the detriment of the five year housing land supply and long term delivery.

4.3 We are sceptical about the wording of objective 1. The five year land supply should be to meet the full, objectively assessed housing requirement; whether or not the LPA can meet a five year requirement is secondary to the consideration of what the appropriate requirement is. The five year supply rule is only there to maintain pressure on LPAs to deliver and release land where existing allocations and consents are not delivering.

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?

5.1 Business West commissioned an assessment of the Wider Bristol SHMA, which concludes that the SHMA headline figure of planned housing numbers and its delivery of housing needs to increase significantly if it is to achieve desired outcomes in terms of the criteria for housing and economic performance set out in National Planning Guidance (2014). It is anticipated that the objectively assessed need based on sound evidence and reasonable assumptions, including demographic factors and market signals is in the order of 130,000. We consider this study to be pertinent and expect a positive response from the West of England UAs over the coming months in response to this.

5.2 In addition to the Business West SHMA review, our clients Crest Strategic Projects, as part of a wider consortium of developers, have commissioned independent consultants to undertake a review into housing numbers. This review will be submitted as separate representations to the JSP.
5.3 One of the weaknesses of the previous attempts at sub-regional planning (ie the SW RSS) was that there was an overestimation of the number of units that could be delivered on the areas of search identified. Further evidence base studies need to be undertaken to determine the level of infrastructure investment required, as well as and housing capacity studies in the potential strategic locations. Overestimating the capacity of sites will detract from just how many strategic sites are required; we are keen to assist the UAs to undertake this work in respect of how many homes and jobs the Hicks Gate location can deliver.

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

Approach to JSP – Wider Bristol and Bath HMAs

6.1 The JSP and SHMA is limited to an assessment of housing need for the Wider Bristol Housing Market Area (HMA). The housing requirements to meet the needs of the Wider Bristol HMA will be allocated to each UA. The Wider Bristol HMA covers all of Bristol, North Somerset, South Gloucestershire and it is acknowledged this extends into part of Bath and North East Somerset, Sedgemoor and Stroud districts. The JSP does not seek to consider the housing needs arising within the Bath Housing Market Area. This is subject to a separate SHMA, and the housing requirement for the Bath HMA is programmed to be reviewed in 2019. The JSP will set out the requirement for the Wider Bristol HMA to be met within the BANES UA.

6.2 We accept that Bristol and Bath have separate HMA’s as indicated in Figure 7 of the Issues and Options document. What we do not agree with is the approach to only assessing the Bristol HMA as part of this West of England JSP, when the Bristol and Bath HMA’s are intrinsically linked. It is a disjointed methodology and we do not support an approach that excludes the Bath HMA area from proper consideration through the JSP.

6.3 What has not been explained in the Issues and Options document is the process should BANES need to accommodate some of the Bristol HMA housing numbers. What are the timescales for understanding whether BANES are able to take any Bristol HMA housing numbers? Could there be significant delays waiting for BANES to undertake their SHMA in 2019 before it can be confirmed whether it can accommodate Bristol HMA numbers? How would this work with the five year housing land supply and Green Belt release? We have significant concerns that the current approach will delay the delivery of housing and it raises the issue of the UAs ability to comply with the duty to cooperate. There is little logic in the approach as it would be helpful at this stage to know whether the needs of the Bath HMA can be met within the HMA or whether the Bristol HMA (and other surrounding HMAs) need to accommodate any unmet need.

JSP Function

6.4 The issues and Options document is not wholly explicit on the role of the JSP and how this will relate to the subsequent development plan stages. Paragraph 1.11 states that the JSP will provide the higher level strategic planning policy framework for each of the UAs own local plan reviews. The Issues and Options document does not include the timetables for the local plan reviews, however from examining each of the UAs Local Development Schemes, all four UAs have timetabled reviews following or running alongside the JSP timetable. It is very encouraging to see the local plan reviews coming forward in tandem with the JSP. The local development schemes confirm that in accordance with the JSP, the local plan reviews will set out the housing requirements, and allocate sites for housing, employment and other land uses. The mechanism for Green Belt review is not confirmed, but it is understood the JSP will establish the principle, and amendments will be made through local plans. Further clarity is sought on this aspect.

6.5 The timetables set out for the JSP and local plan reviews are commendable. If the JSP is to achieve the housing targets and ensure a five year supply is maintained in the UAs, best endeavours should be made to ensure the timescales put forward in the Local Development Schemes are met. This is even more pertinent should the housing numbers increase.

6.6 The use of Local Development Orders is encouraged as a suitable mechanism for the streamlined delivery of residential and employment sites identified in the JSP. This would ensure the JSP’s effective and timely delivery of development in accordance with the aspirations of the UAs.
6.7 The JSP must ensure a positive outcome. Most of the proposed potential urban extensions now identified were being brought forward in the former draft West of England RSS. Should regional strategies not have been revoked by the government in 2010, many of these sites could now be delivering new homes. The growth of the West of England could be considered as behind where it could have been and the efficient adoption of the JSP is necessary to ensure the homes needed are delivered in full by 2036.

6.8 A robust evidence base is also an important factor to the delivery of housing. Leading on from the Infrastructure Position Statement evidence base document, a comprehensive assessment of the West of England’s infrastructure requirements which looks specifically at the strategic locations should be undertaken prior to the publication of the draft JSP.

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

7.1 As suggested in paragraph 3.10 of the Issues and Options document, a modest housing increase could be considered to provide further affordable homes. The document however discounts this option, the reasons being that this could lead to a substantial over provision of housing sites beyond which the market can sustain or deliver. Given we are in the midst of a housing crisis, it is a safe assumption to make that there is no danger of this happening. It would be a sensible option to increase the amount of housing overall to accommodate higher levels of affordable housing. In addition, the proposed affordable housing policy changes as previously addressed in Section 2 further emphasises this need. Simple market economics suggests that the greater the supply of homes the more affordable they will become; this is at the heart of Government policy and any restriction on supply is self-evidently not helpful to the cause.

7.2 If an average of 22.2% of housing has been affordable in the past, realistically it should be assumed that it will be delivered at this rate in the future unless there are market changes. The Business West representation states that the level of affordable housing provision of the SHMA, whilst justified in needs terms, lacks credibility as something which can be delivered in the actual policy and market situation which now prevails. Affordable housing requirements and s106 agreements are likely to be lower than the affordable housing target, which concludes that the only route to delivering this level of affordable housing will be through increasing the total housing numbers substantially. We agree with this conclusion.

7.3 Paragraph 3.11 of the Issues and Options document suggests some incentives to stimulate affordable housing provision such as a public subsidy, increasing the percentage of affordable housing and provide public land at a discounted value. Any of these incentives are welcomed, however given the previous rate of delivery of affordable housing it is unlikely that an increase in the percentage of affordable housing on new sites will be a dependable option. The only option suggested to increase delivery, aside from increased housing numbers is through public subsidy. In a time of austerity where is this funding coming from to make a difference?

**Questions 7 and 8. Have we identified the right employment issues? & where should new employment land be located?**

8.1 The JSP correctly identifies the importance of available employment opportunities for the future sustainable growth of the West of England. The UAs commissioned Atkins to undertake an Economic Development Needs Assessment (EDNA) which assesses the employment land demand and supply characteristics for the Functional Economic Market Area (FEMA) for the West of England. The FEMA includes all four UAs. Consideration was given as to whether Bath should be considered a separate FEMA as it is its own HMA. However, it was considered that the critical economic mass and key supply chain linkages in the West of England lie within the West of England/Bristol city region rather than a fragmented collection of smaller economic sub-markets. It was concluded that fragmenting the West of England into a series of smaller FEMAs could potentially hinder economic development needs. It is highly questionable that BANES is so intrinsically linked in terms of the economic area, but not in terms of housing.

8.2 The EDNA concludes that the West of England has a healthy employment land market and there are expectations of growing demand in the future. Allocated or future potential employment land is identified in
Figure 2. The EDNA concludes that the identified economic development needs of the FEMA to 2036 can be met in the available developable employment space. There is a relatively significant surplus of employment land to meet projected demand at between 391 to 520 hectares. However, this predominantly relates to the amount of land available at Avonmouth/Severnside. It should be considered whether there is sufficient employment land available throughout the rest of the FEMA, particularly in areas of significant deprivation. New employment land should be located in and adjacent to existing employment areas, major centres, and areas where it will reduce out-commuting.

8.3 The EDNA identifies that South Bristol is a relatively deprived area with a lack of employment space, despite being well located near the Bristol urban area. We support the suggestion that to address the relative deprivation and degree of market failure in South Bristol, development schemes (comprising investment in key infrastructure, housing and employment) within South Bristol and its fringe could be pursued. We support proposals that will create a virtuous cycle of investment and stimulate demand for employment uses, thereby helping to create jobs and addressing relative deprivation in the area. In order to achieve this regeneration it is imperative that provision of housing (i.e. homes for the workers) is focused alongside economic development in these locations (like South Bristol) where re-generation is sought.

8.4 The site at Hicks Gate, located in the South of Bristol, could accommodate an element of employment land to aid in the regeneration of the area.

8.5 The issues and Options document suggests that there is opportunity for a more efficient use of employment land. This suggestion is fine in principle, however it is questionable whether there are many viable opportunities to redevelop existing employment sites in practice.

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

9.1 Meeting development needs within existing cities and towns, and on brownfield land is the most sustainable approach in the first instance in line with NPPF principles. This approach draws on existing job opportunities, infrastructure, services and facilities, and will minimise development on greenfield land. We support the UAs brownfield first approach in terms of site selection, but have stated above that there should be no phasing restriction on greenfield land release.

9.2 We understand the four UAs have commissioned an assessment to confirm the potential of existing urban areas to deliver land to meet development needs which has not yet been published, but is due to be issued in early 2016. We consider this to be the appropriate approach to ensure the identification of any development opportunities within the existing urban areas. There is a need to maximise what is achievable within the urban area, whilst maintaining the sensitive balance so as not to result in overdevelopment.

9.3 Ahead of the publication of the assessment, the Issues and Options document anticipates up to 12,000 homes could be accommodated through urban intensification. Based on the SHMA housing need figure of 85,000 homes to 2036 (a figure which will be scrutinised and may increase), 56,000 homes are planned and forecast, and 12,000 are accommodated through urban intensification, leaving at least 17,000 homes to be identified on greenfield land. Housing need that cannot be accommodated in the cities and towns should then be considered in sustainable greenfield locations.

9.4 Notwithstanding the Green Belt, Bristol is physically constrained and there are limited expansion options. Most crucially brownfield land is a finite resource and no evidence has been presented to demonstrate that the 12,000 homes figure is achievable as the assessment has not yet been completed. It even acknowledges at paragraph 4.12 that until the assessment is completed, robust estimates are not possible. Paragraphs 4.10 and 4.11 recognised that an increase in development within urban areas will have implications for existing infrastructure and will require the use of incentives, however there are currently no details about how this might be achieved. Therefore any estimates about the number of homes that could be achieved on brownfield sites should be considered as a conservative estimate. This is especially in the context that over the last 20 years there has been a reliance on brownfield sites and this cannot continue at the levels of completions previously achieved. Furthermore, we are already seeing issues associated with the loss of existing uses to...
residential e.g. rising prices on secondary office accommodation due to the office to residential permitted development rights.

9.5 Sustainable greenfield locations should be in close proximity to the existing urban area, which are well connected via public transport and infrastructure. Further, if there is an opportunity to regenerate deprived areas such as in south Bristol, this would sequentially be the next sustainable option. This sequential approach inevitably has consequences for the Green Belt immediately adjacent to the Bristol urban area.

**Question 10. Have all the reasonable strategic locations been identified? Are there any others we should consider?**

10.1 We consider that a reasonable number of strategic locations have been identified within the context of delivering an estimated 85,000 homes, and we have no further suggestions to make at this stage. However, we would look to review in further detail should the housing numbers increase.

**Questions 11 and 12. Do you have comments on the suitability of any of the strategic locations & in your opinion, do some strategic locations have advantages or disadvantages in terms of addressing the critical issues identified in Chapter 2?**

**Hicks Gate urban extension**

**Policy context**

11.1 Hicks Gate in southeast Bristol has been identified in the JSP consultation document as a strategic location for a potential urban extension. Hicks Gate is the only proposed urban extension with an existing positive policy context. It is identified in the Bristol Core Strategy under policy BCS5, which sets out the housing supply and the spatial distribution of new homes for the plan period 2006 to 2026. This identifies Hicks Gate in southeast Bristol as a contingency site for up to 800 homes:

> ‘If monitoring shows that planned provision will not be delivered at the levels expected, or if the land is required to accommodate higher levels of provision, the following contingency for development of new homes will be considered:

- Use of some Green Belt land including southeast Bristol as a long-term contingency for an urban extension. The broad location is indicated on the Key Diagram.’

11.2 Please see Appendix 1 for an extract of the Key Diagram from the adopted Bristol Core Strategy that identifies the contingency at Hicks Gate.

11.3 Policy BCS5 explicitly identifies Hicks Gate as a contingency site should additional housing be required outside of the planned provision between 2006 and 2026. The JSP looks ahead by another decade to 2036 and requires the identification of additional housing for this period. In continuation of the objectives of the Bristol Core Strategy policies, it is now necessary to bring forward this contingency site as a formal site allocation through the JSP and Core Strategy review. Hicks Gate is the only urban extension with a contingency allocation, and as such should be considered to be the most sustainable and sequentially preferable greenfield site outside of the Bristol urban area. Due to the positive policy context, it should be a priority location for release.

11.4 Through the preparation of the two relevant Core Strategies (Bristol and BANES) the location has always suffered from cross-boundary issues and a lack of imposition of the Duty to Cooperate. This is most succinctly summarised by the Bristol Core Strategy Inspectors Report (2011):

> “44. There are no other realistically available sources of housing land supply within the city to increase housing provision other than the Green Belt. In relation to the potential scale of additional
housing that might be required if the Council has been too pessimistic or cautious about household and economic growth, the contribution from the Green Belt within the city boundary is quite modest, although clearly material. But the Green Belt could also have a role in providing sizeable urban extensions on a cross-boundary basis, as was proposed by the Secretary of State in the emerging RSS. A cross-boundary approach would ensure that the size and form of any urban extension(s) was properly planned to maximise sustainability, rather than being determined by the rather irregular shape of Bristol City’s administrative boundary.”

11.5 The matter is also referred to in the BANES Inspectors Report (2014):

“114. An urban extension straddling the boundary of the City of Bristol and B&NES has been consistently pursued throughout the Examination by Crest Strategic Projects and others (see CD4/UE2 and Masterplan January 2010). The merits of this location were discussed at the hearings in January 2012. The Council’s summary evaluation of this location is in SA Annex L - Locational alternative appraisal matrices (CD9/A1/5). The A4 bisects the site so there is the potential for good access to public transport from the frequent services between Bath and Bristol along this road and the Brislington Park and Ride is close to at least part of the site.

115. Whatever its merits as a carefully planned urban extension straddling the administrative boundary, I accept the Council’s view that it is not a creditable option to be pursued at this stage within B&NES only. The land within B&NES which is promoted for development is separated from the built-up edge of Bristol by Green Belt within Bristol City. This land is identified as a long-term contingency for release in the adopted Bristol Core Strategy (CD3/15), but only if required to meet housing needs as a result of delivery issues or when housing needs are reassessed.”

11.6 Hicks Gate is the only sizable Green Belt site within BCC administration, however part of the site is located within BANES. It will be important for a collaborative environment to exist between all four UAs to enable the aspirations of the JSP to be delivered. Collaborative working is promoted by Bristol Core Strategy Policy BCS6. The JSP provides the opportunity to essentially deliver this policy, which relates to BCC’s compliance with the duty to cooperate to work with neighbouring authorities should an urban extension in the Green Belt emerge through the development plans of neighbouring local authorities.

11.7 We are further encouraged by the BANES Local Development Scheme which includes a provision for an early partial review of the BANES Core Strategy to be undertaken in conjunction with other UAs reviews, which will be informed by the JSP work. This is the opportunity for sites affected by cross-boundary issues to be properly considered via the Duty to Cooperate.

11.8 It is recognised that Hicks Gate will not accommodate the surplus greenfield housing requirement unaccompanied. At this stage, we do not discount any of the other proposed potential urban extensions to come forward in the plan period in addition to Hicks Gate. The UAs may require additional options depending on the housing requirement. We do have some reservations regarding the potential urban extension north of the M4/M5 but refrain from comment until further detail has been provided. Notwithstanding any other sites, as the only site with a positive policy context, Hicks Gate must be first in line as the most sequentially preferable greenfield site.

Sustainable development

11.9 Hicks Gate is located either side of the A4 Bath Road, to the southeast of Bristol City Centre. Site location plans are provided in Appendix 2. The site is the closest potential urban extension to Bristol City Centre. Furthermore, the site is closer to the Bristol City Centre than many other parts of the existing urban area of North, East and South Bristol. Please see Appendix 3 for a site context plan. The sites positioning represents a sustainable location that will maximise the existing infrastructure, facilities and services in the area.

11.10 The site has numerous locational benefits, and there are a wide range of uses within close proximity to the site, being on the urban fringe of Bristol:

- To the west of the site are Brislington and Flowers Hill Trading Estates, comprising a range of large and medium sized industrial and distribution units, offices and other smaller uses. Adjacent to this
area is Brislington Retail Park which includes large retail stores and a supermarket. Delineating the western boundary is the Park and Ride site, taking traffic principally from the A4 travelling towards Bristol;

- There are two large education establishments in close proximity to the site to the east, Brislington Enterprise College (secondary school) and St. Brendan's College (further education) with associated sports pitches and outdoor recreation facilities. To the west of Ironmould Lane, which delineates the northwest boundary, is Long Fox Manor, an impressive building in residential apartment use. Further to the north west, Ironmould Lane leads to Heath Farm, Broomhill Nurseries and the residential area of Broomhill itself with its associated facilities such as a police station and primary school;

- To the south and west is a large public park called Stockwood Open Space, a Local Nature Reserve which lies immediately beyond Stockwood Road which delineates the south western boundary of the site. Beyond Stockwood Open Space is Knowle Golf Course, whilst another golf course, Stockwood Vale Golf Course, is further to the south on the southern side of Stockwood Hill. Stockwood Hill itself leads on to the residential area of Stockwood. The southern boundary of the site is defined by a series of field boundaries leading up the steep slope towards Stockwood Hill;

- Further to the east of the site is Stockwood Vale, a small residential community served from Stockwood Hill. Beyond lies the town of Keynsham, connected by the A4175. Delineating the eastern boundary of the site are fields to the south, Hicks Gate Roundabout on the A4, and the A4174 Bristol Ring Road leading northwards. These are major transport links connecting north Bristol to the A4 and Bath to the east;

- The northern boundary is delineated by field boundaries, beyond which lies the steep sided River Avon valley. The Bath to Bristol railway line runs along this valley, together with Bickley and Hencliffe Woods with a riverside public right of way.

11.11 The site encompasses a number of uses illustrated on the plan opposite. The majority of the site is in agricultural use, comprising a series of fields. Other than these fields, there are a number of other uses within the site boundary which will be integrated into the proposals but retained with existing access. These include the following:

- Brislington Football Club (founded in 1956) and the adjacent Brislington Cricket Club (founded in 1868) lie to the north of the A4 adjacent to the western boundary. These are served from Ironmould Lane;

- Oakleigh House, a listed Georgian country house with gatehouse, served by a private drive from the A4. The house itself is proposed as part of the northern neighbourhood centre, converted into a community use such as a public house with parking and public gardens;

- To the south of the A4 is a small group of buildings clustered around Hicks Gate Farm, served from Durley Hill;

- Wyevale Garden Centre at the centre of the site is served directly from the A4;

- Adjacent to the garden centre are the Council owned public allotments.

Access

11.12 The Hicks Gate location at the juxtaposition of an existing main public transport corridor and the strategic road network, together with proximity to a Park and Ride site with potential for expansion, allows the proper integration of land use and transport planning. The provision of local facilities would foster an element of self-containment and so help reduce traffic movements on the wider road network.

11.13 The site is situated less than 4 miles by road to the centre of Bristol. Employment use at Hicks Gate would be well located from a transport perspective. HGV movements would have convenient direct access to the strategic road network. Employees would have the benefit of proximity to services on existing bus corridor.
The housing element of the scheme would provide the opportunity for people who wish to live near their place of work.

11.14 Review of the public transport network in the area has confirmed that the site has a high existing standard of accessibility by sustainable means of transport. There are excellent bus links and frequency of service along the A4 straight into Bristol City Council. Bristol City Council’s strategy for the A4 corridor on the approach to the central area is to further enhance bus priority measures. This means that development at Hicks Gate can begin with an existing high standard of accessibility already in place.

11.15 A strategic cycle route passes along the south side of the A4 past the site. This links to a network of designated quiet roads within Bristol. The cycle route also connects via Durley Hill to the centre of Keynsham and via a signal crossing on the A4 with a cycle route along the Ring Road to the north. The A4 and nearby local roads have footways, mostly on both sides. These connect to the Brislington Enterprise College and to St Brendan’s Sixth Form College, and beyond. The development can provide connections to these and other public rights of way connecting to the site to maximise pedestrian and cycle permeability and promote non-car modes of movement.

Economic Development

11.16 The EDNA identifies South Bristol as a relatively deprived area with a lack of employment space, despite being well located near the Bristol urban area. Consideration can be given to the role that Hicks Gate can have in accommodating an element of employment land to stimulate regeneration and create jobs, thereby tackling deprivation in the area. Development at Hicks Gate presents an opportunity to deliver key social and economic benefits in South Bristol.

11.17 New employment development on the site will sit well with the existing trading estates, retail and business parks, and education establishments immediately adjacent to the site to the west. It is an ideal opportunity to provide further employment opportunities for the new community and existing neighbourhoods on adjacent land within the site.

Deliverability

11.18 A number of technical studies were last carried out in 2010, in support of promoting the site through the RSS and Core Strategies. At this time we can confirm that no technical reasons were revealed as to why the site could not be delivered. We look forward to working with the UAs in the coming months to review the studies and plug any gaps that there might be, as well as collaboratively working to ascertain the infrastructure requirements for the site.

11.19 The development can come forward in carefully planned stages to respond to housing and economic need during the plan period. It is important that the phasing strategy is designed to provide an integrated, comprehensive development throughout the various stages of construction and operation. We invite early discussion with both BCC and BANES to discuss the deliverability of a sustainable mixed use urban extension. A significant body of evidence and masterplanning exists; this has been submitted through the development plan previously (and so is not done so again at this stage) but we look forward to reviewing the evidence base with officers and updating and plugging any gaps that might exist.

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

Option 1 Protection of the Green Belt

12.1 Paragraph 2.14 of the Issues and Options document identifies the Green Belt as a spatial issue. This states that the Green Belt ‘has and should continue to have a significant role to play in maintaining the open countryside in a large part of the West of England and has been a major factor in shaping the location of new development’. What needs to be considered is whether it is sustainable to continue to shape development around the existing Green Belt or whether it should be amended.
12.2 Taking the total housing need figure identified by the SHMA of 85,000 dwellings, and after deducting the 56,000 planned and forecast homes, this leaves a potential shortfall of about 29,000 dwellings to be delivered to 2036. It is anticipated that 12,000 dwellings may be delivered through urban intensification, which leaves 17,000 dwellings to be identified on greenfield areas.

12.3 The Green Belt encompasses 48% of the sub-region, including much of the urban development edge around Bristol. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The government confirms through the NPPF paragraph 83 that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Paragraph 84 of the NPPF goes on to say that when reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards locations beyond the outer Green Belt boundary.

12.4 We consider that the lack of available greenfield sites without Green Belt status adjacent to the Bristol urban area, together with the need to deliver at least 17,000 homes on greenfield land until 2036, results in exceptional circumstances to ensure sustainable patterns of development are delivered. The Green Belt can be amended whilst maintaining its function and integrity. One or more well planned urban extensions would not result urban sprawl, and the Green Belt that remains would continue to safeguard against the coalescence of settlements.

12.5 It is our view that it is not possible to deliver a sustainable pattern of development on the most sequentially preferable greenfield sites (in line with the JSP guiding principles para 1.7 iv) unless the Green Belt is amended to release land for development adjacent to the Bristol urban area. In these areas there are existing employment opportunities, transport infrastructure, facilities and services. The alternative would be to direct development to less sustainable locations remote from the Bristol urban area, which would increase car dependency and commuting. These areas do not have a good level of services or infrastructure, and are generally not well related to transport corridors. We recognise that these settlements do have a role to play in terms of low levels of development, however they can never be a focus for growth. This spatial scenario would be wholly unsustainable.

12.6 This view is reflected in table 5.3 which raises a number of key issues that could arise in a scenario where there is no change to the existing Green Belt, particularly that retention of Green Belt means that the focus of development, apart from urban intensification, is further away from the Bristol urban area, resulting in Bristol’s housing and affordable housing needs not being met so effectively. In addition we agree that this approach would be less effective at supporting sub-regional growth and that this could result in more commuting and increased reliance on car journeys. Although there may be some implications for the rural landscape it is considered that there are areas within the Green Belt which could accommodate appropriate development without significantly harming the rural landscapes.

**Option 2 Concentration at Bristol urban area**

12.7 This spatial scenario is supported in principle as Bristol is the most important regional centre, and the main focus for jobs, housing, services and facilities within the plan area. It is the ‘Bristol’ Housing Market Area for a reason, and Bristol is clearly the most sustainable centre to direct development. However, due to Bristol being physically constrained, there is a capacity issue. It is unlikely that this scenario would be able to achieve the estimated anticipated housing need with this option alone and without significant alterations to the Green Belt. We support an appropriate level of alterations to the Green Belt to accommodate urban expansion. Furthermore, if as the Business West and other representations state, housing numbers increase, it is even less likely this approach would be able to accommodate sufficient housing growth.

12.8 Although development in the Bristol urban area should be the focus as this spatial scenario suggests, we do not believe that this scenario will be able to feasibly deliver the housing numbers without an element of the other proposed scenarios. We consider that levels of growth commensurate to the sustainability of other settlements in the district should also be considered alongside a Bristol urban area focus.
Option 3 Transport focused

12.9 This scenario focuses on locations assessed that perform better in terms of access to sustainable travel choices and likely congestion impacts. We agree with the sequential priorities for development that this scenario advocates. Urban areas that already have good travel choices are clearly the first priority for development. Second to this are locations closer to central Bristol, where there would be opportunity to integrate transport links to Bristol City Centre. This also states that a focus on development in south Bristol will help bring housing and future employment together, which we wholly support. Development in this relatively deprived location will also stimulate much needed growth in the area. The south of Bristol is clearly the most logical location for future development. The third priority would be to allow development at locations that have good rail links into central areas.

12.10 The tiers of priority presented by this scenario essentially rank the locations in terms of levels of sustainability. Although transport is one element of sustainability, it is an important facet, and it is a key consideration when considering the allocation of significant future growth. This is in accordance the UAs commitment to ensure the emerging transport plans are integrated and co-ordinated with the JSP.

12.11 This scenario, which considers wider locations for development is more likely to be able to accommodate the total housing numbers. In our view this is an appropriate methodology to consider the spatial Options for housing in a sequentially sustainable approach.

Option 4 Even spread

12.12 This spatial scenario presents a more even spread of development across the sub-region. It provides more flexibility for the delivery of housing, however this is not a sequential approach and therefore it is not likely to be the spatial scenario most reflective of sustainable patterns of development. This approach will essentially consider any of the growth options including urban extensions, town expansions or development at other settlements. At this stage, the scenario is not specific as to the scales of growth proposed or locational options, and therein no diagram is presented for this scenario. It is therefore difficult to fully comment on this option at this stage, when it is uncertain how it will progress.

12.13 From the initial information provided, this option is less focused on Bristol, which is not supported. As previously stated, we consider that levels of growth commensurate to the sustainability of other settlements in the district should also be considered alongside a Bristol urban area focus. However, this scenario seems to suggest that growth may be directed towards a variety of locational options, including less sustainable locations, which are not likely to be so effective in achieving transport aspirations, and may be remote from jobs. This approach prejudices the aspirations for promoting sustainable transport and development generally.

12.14 Further, until the housing numbers are finalised, it is difficult to properly consider the spatial scenarios. This scenario, where growth is allocated across the sub-region, will likely include growth at settlements varying in levels of sustainability. Development should only be allocated in less sustainable areas where the housing numbers cannot be suitably accommodated in the sequentially more sustainable areas such as the Bristol urban area and land adjacent to the Bristol urban area, then locations well connected by transport links.

Option 5 New settlement

12.15 This scenario considers opportunities to concentrate development into a single or small number of new strategic locations. We do not consider this to be an immediate option over the JSP plan period as other more sustainable Options better related to the Bristol urban area should be utilised in the first instance. A new settlement is likely to be remote from the Bristol urban area, and will not be well related to meet Bristol’s needs. It will likely require significant infrastructure investment, reducing the ability to improve upon existing issues elsewhere. Further, a new settlement would raise sustainable transport concerns unless sufficiently distant to ensure high self-containment.

12.16 As there are currently no proposals for a new settlement or the major expansion of an existing settlement, if this scenario was progressed it would take substantial consultation and technical site investigation. This would inevitably cause substantial delays to the delivery of the JSP.
12.17 Although we do not consider this to be an appropriate option within the plan period/current number of homes planned for, we do recognise that this may be a suitable option for future growth in the West of England. Options could be considered in subsequent plans that deal with housing growth beyond 2036 or considered now for long term release.

Conclusion

12.18 In conclusion, we consider that a combination of spatial scenarios 2 and 3 will result in the most sustainable pattern of development on the premise that the housing numbers will increase. Concentrating on the Bristol urban area and transport focused development are complimentary, not alternative Options. Option 2 comprises a concentration of development at the Bristol urban area, the most sustainable location within the HMA. However, it is unlikely that the total housing numbers can be accommodated through this scenario alone and therefore development at other settlements, which are well connected to Bristol, should form part of the strategy to deliver the required housing figure. Brownfield land is a finite resource and the 12,000 homes attributed to urban areas is unassessed and we await the results of the study to ascertain urban intensification capacity. Option 3 comprises a transport focus, which presents a suitable methodology to be able to sequentially identify sustainable locations that will be able to accommodate growth. This will highlight the most sustainable urban extensions, towns and other settlements in the West of England. We consider that levels of growth commensurate to the sustainability of other settlements in the district should also be considered to support a Bristol urban area focus for development. Furthermore, dependent on the level of the housing numbers, it may be sequentially appropriate to allocate low levels of housing in smaller settlements which have not been included on the Transport focused diagram, comprising an element of the even spread scenario of Option 4. We do not support Option 1 as it is clear that Green Belt release is fundamental for sustainable growth. We do not consider Option 5 a feasible option for the JSP, but should be considered through this process as a growth option post 2036.

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

13.1 We do not consider a new settlement to be a suitable option within the timescales of the JSP as discussed in the previous question. However, this should be considered as a long term strategy within the West of England post 2036.

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

14.1 The intention to fully integrate the spatial and transport studies is welcomed and must be adhered to throughout the JSP process.

14.2 New development should be concentrated along existing and potential transport corridors within Bristol and to main nearby other centres, where further enhancements can be made progressively. There has been considerable recent investment in sustainable transport infrastructure, and new development should capitalise on this to minimise the need for new major transport infrastructure. As previously discussed, growth through the complementary spatial scenarios 2 and 3 would best utilise existing transport infrastructure.

14.3 Hicks Gate is in a beneficial position, which will be able to draw upon and maximise the benefits of previous investment in transport infrastructure in the locality, including strong sustainable transport links. The site immediately adjoins the A4 which is one of the strategic bus corridors resulting from investment in the Greater Bristol Bus Network. To the west, this provides a bus priority route directly into Bristol City Centre. The Brislington park and ride site with frequent existing bus services is adjacent to the site on the western edge. To the east the A4 continues to Keynsham and Bath. The site is also at a key juxtaposition of the radial road and orbital road network resulting from investment in the Ring Road around the east and north of the City. This would allow necessary vehicle movements to be distributed and so limit issues of congestion within the inner areas of the City.
14.4 A Hicks Gate urban extension would be able to benefit directly from this past investment. Initial stages of development would be able to progress without major new infrastructure. The requirements of longer term development can be worked up during the JSP and JTS process, as well as the normal planning process leading to an application. The existing transport infrastructure at Hicks Gate means that such longer term measures as may be identified could be introduced incrementally.
Appendix 1:

BCC South Bristol Key Diagram Extract
Appendix 2:

Site Location Plans
Appendix 3:
Site Context Plan