INTRODUCTION

1. This paper explains the process undertaken by the West of England Unitary Authorities (UAs) to prepare the November 2016 emerging spatial strategy as set out in the “Towards the emerging Spatial Strategy Consultation”.

2. The Housing Target for the JSP is 105,000 dwellings for the period 2016 to 2036. Of this, around 66,000 is already committed in existing plans. This leaves about 39,000 dwellings to be identified through the JSP.

3. In summary the process has involved five stages as summarised below. At each stage inevitably planning judgments have been made [to inform the choices made

- Identify the reasonable alternative strategic locations
- Clarify what Sustainable Patterns of Development are in the West of England
- Assess the implications for the Green Belt
- Selection of locations
- Refinement of spatial strategy
STAGE 1: IDENTIFY THE REASONABLE ALTERNATIVE STRATEGIC LOCATIONS

4. The 2015 Issues and Options document identified a schedule of strategic locations classified by broad spatial characteristics. This has been refined through further more detailed assessment of the identified locations as well as the consideration of new sites. The key outputs from the evidence base are:

   a. an understanding of the urban capacity of existing towns and cities (Urban Living)
   b. a range of strategic development locations have been identified. The suitability of these locations has been assessed in a consistent way across the Plan area. This assessment has considered a range of factors including flood risk, landscape, heritage, ecology and physical constraints.

5. An allowance has also been made for ‘non-strategic growth’ to accommodate on-going housing development in villages and towns which is needed to enable local communities to thrive. This allowance is for up to 1,000 dwellings each for Bath and North East Somerset, North Somerset, and South Gloucestershire, and around 400 for Bristol, totalling 3,400 dwellings. This leaves around 35,600 dwellings to be found via the JSP strategic development locations.

6. The evidence base identifies where there are significant constraints to development which are likely to affect delivery over the plan period. The assumption is that locations with a potential capacity of less than 500 dwellings are not considered to be strategic for the purposes of this plan. Some of the key conclusions emerging from this work are:

   Flood risk

7. Significant parts of the plan area are located in low lying areas at risk from flooding. In order to locate development away from areas of highest risk, the plan excludes strategic sites within flood zone 3. (See UA SFRA) An exceptions test is required if locations in the flood zone are to be pursued. This has excluded much of Severnside and most locations at Clevedon, Weston Super Mare and Portishead.

   Areas of Outstanding Natural Beauty

8. NPPF paras 115-116 states that great weight should be given to conserving landscape and scenic beauty in the Areas of Outstanding Natural Beauty and so no strategic locations have been identified in these Areas.

   Bath World Heritage Site

9. Bath is inscribed by UNESCO as a World Heritage site and this includes the setting of the City. There are no further opportunities for the outward expansion of Bath. These were investigated thoroughly through the preparation of the B&NES Core Strategy and have been reviewed in the context of the JSP. The outward expansion of Bath would have a significantly harmful impact on local, national and international environmental assets such as the World Heritage Site & its setting, the Cotswolds AONB and European Special Areas for Conservation (Bats). The severity of harm...
caused by development in these locations would significantly outweigh the benefits. The city is also tightly bound by the Green Belt with most locations playing a very important role in Green Belt terms.

10. The potential locations identified through this stage of the work are listed in Annex 1.

**STAGE 2: CLARIFY SUSTAINABLE DEVELOPMENT IN THE WEST OF ENGLAND.**

**Sustainability Appraisal**

11. Local Plans are the key to delivering sustainable development that reflects the vision and aspiration of local communities (NPPF 150). The plan-making process takes into account the Sustainability Appraisal of individual strategic locations, as well as the cumulative impacts of different scenarios, transport modelling, and the responses to the Issues & Options consultation. This has informed the understanding of sustainable patterns of development as such patterns relate to the West of England.

12. The NPPF identifies three dimensions to sustainable development: economic, social and environmental. All three dimensions have been taken into account in the appraisal process and have been considered as mutually dependent as required by the NPPF. Sustainability is closely, but not entirely, related to location. Those locations which reduce the need travel and, where travel is necessary, facilitate travel by walking cycling or public transport, have wide ranging benefits. They facilitate carbon reduction and reduced pollution with associated environmental and health benefits; they encourage active travel modes which benefits health; they help to integrate existing and new communities to facilitate social integration. They have substantial economic benefits with reduced congestion and enable a supply of resident workers in accessible locations.

**Strategic Priorities**

13. In addition, the strategy needs to deliver the Plan’s five overarching priorities in order to respond to the critical issues facing the West of England. The Strategic Priorities are reproduced below and how they respond to the critical issues is set out in Annex 2.

a. **Economic**: To accommodate the economic growth objectives of the LEP Strategic Economic Plan and identify sufficient land to meet the economic growth of both existing employment centres such as the Enterprise Zone/Areas and in new locations which will most successfully deliver appropriate scale and type of jobs

b. **Social**: To identify a sufficient supply of land to meet the full need for housing and ensure that the JSP benefits all sections of the communities, in particular by boosting growth opportunities in the south of the sub-region in order to re-balance the economic benefits between the north and south of the WoE.
c. **Infrastructure**: To ensure Infrastructure is aligned with development in a timely way and addresses existing challenges and creates capacity for sustainable growth. Strategic development should be in locations which maximise the potential to reduce the need to travel or where travel is necessary, maximise opportunities to travel by sustainable, non-car modes,

d. **Environment**: To protect and enhance the sub-region’s diverse and valuable environment and ensure resilience to future development and the impacts of climate change,

14. Alongside this, the Joint Transport Study contributes some guiding principles for the preparation of a spatial strategy, from a transport perspective. These are that spatial options should:

- take account of existing challenges on the transport network.
- support shaping of an integrated transport system to improve sustainable travel choices, reliability, resilience and connectivity.
- support development of an inclusive, accessible and affordable transport system.
- not result in significant increases in traffic on sensitive urban or rural roads that cannot be mitigated through alternatives to the car.
- if possible, integrate new transport infrastructure as an integral part of new development.

15. Based on the above, the broad spatial implications for the location of strategic growth locations in the West of England are as follows:

a. Maximising the sustainable capacity of existing urban areas, ensuring high quality places for existing and new residents
b. Development outside the Green Belt in close proximity or well related in sustainable transport terms to existing urban centres, especially to the south west and south east of Bristol and adjoining Weston-s-Mare
c. Other sustainable settlements
d. If exceptional circumstances exist to alter the Green Belt, to use the most sustainable locations
STAGE 3: ASSESS THE IMPLICATIONS FOR THE GREEN BELT

16. A sizeable proportion (48%) of the West of England is part of the Bristol-Bath Green Belt. This has significant implications for the spatial strategy, particularly reflecting the strategic priority to retain the overall function of the Green Belt. The advice in NPPF para 83 is “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

17. The assessment of strategic locations and transport modelling show that it is not possible to sustainably accommodate all of the identified growth needs entirely outside the Green Belt. Such a strategy would be dependent on some highly unsustainable locations that are very difficult and expensive to mitigate with only sub-optimal solutions. It would also put pressure to locate development in the floodplain.

18. The other option would be to choose not to meet the housing and growth targets under NPPF para 14. However, this would result in the identified housing needs of the sub-region being unmet which would have severe social implications, and inhibit economic growth and leave existing transport challenges unaddressed. It is likely to lead to a dispersal of development to locations in adjoining districts which is perhaps even more unsustainable than those in the West of England and will increase commuting, pollution with the negative effect of climate change.

19. Therefore, the WoE UAs have come to the conclusion that the exceptional circumstances for altering the Green Belt are demonstrated because of the overwhelming benefits of locating as much of the development as possible in the most sustainable locations and the substantial harm on a strategic scale that would otherwise be caused.

STAGE 4: SELECTION OF LOCATIONS

20. Having acknowledged the need to consider locations in the Green Belt, NPPF para 84 provides further advice in identifying locations;

“\When drawing up or 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 towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.\”
21. Therefore, in light of the conclusions reached above, the spatial hierarchy for accommodating the outstanding 35,600 dwellings is as follows;

a. *urban areas, both inside and beyond the Green Belt boundary*: ie Urban intensification in Bristol, Bath and Weston Super Mare.

b. *towns and villages inset within the Green Belt or locations beyond the outer Green Belt boundary*: ie good transport corridors, especially those well related to southern Bristol. (NB some of these include Green Belt land & so exceptional circumstances are included in the paper)

c. Other sustainable locations including those well related to Weston-s-Mare

d. If Green Belt locations are still required to meet the housing target, prioritise those which are the most sustainable, which deliver the plan’s strategic priorities and best address the Transport guiding principles

**A: Urban Living: channelling development at urban areas inside and beyond the Green Belt boundary**

22. The urban areas should be the primary focus of the development requirements, but in a way which ensures a high quality of life for existing and new residents. In recent years a high proportion of new homes have been delivered on brownfield land in urban areas. Further urban intensification will need to build on new approaches to urban density, and new thinking about the nature of liveable cities and towns and the trends in the type of accommodation we seek.

23. The evidence shows that, in addition to existing commitments, the urban areas have the capacity to accommodate further growth. Opportunities for maximising the potential of existing land will result from:

- the change of use of non-residential brown field land to residential
- underused land which has potential for residential development
- mechanisms to ensure more certainty over the delivery of large windfall sites.
- Higher densities:
- Reappraisal of allocated sites to increase their potential.

24. This will make a substantial contribution to meeting the JSP housing need as follows;

<table>
<thead>
<tr>
<th>District</th>
<th>Existing Plan commitments &amp; windfalls post 2026 (rounded)</th>
<th>Non-strategic (Up to)</th>
<th>Urban Living</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>B&amp;NES</td>
<td>9,700</td>
<td>1000</td>
<td>300</td>
<td>10,400</td>
</tr>
<tr>
<td>Bristol</td>
<td>20,300</td>
<td>1000</td>
<td>12,000</td>
<td>32,300</td>
</tr>
<tr>
<td>SGC</td>
<td>22,400</td>
<td>1000</td>
<td>1,300</td>
<td>23,700</td>
</tr>
<tr>
<td>NSC</td>
<td>14,000</td>
<td>400</td>
<td>1,000</td>
<td>15,000</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>66,000</strong>*</td>
<td><strong>3,400</strong></td>
<td><strong>14,600</strong></td>
<td><strong>84,000</strong></td>
</tr>
</tbody>
</table>
25. Urban intensification yields a total of 14,600 leaving an additional 21,000 dwellings to find.

B: Development at settlements with sustainable links to existing urban areas, including Green Belt inset settlements:

26. There are a number of settlements in the Plan area which meet the requirements of this category, either as settlements excluded from the Green Belt under NPPF para 86 (insets) or locations beyond the outer Green Belt boundary (NPPF para 84). The key requirement is for the settlements to have sustainable access to the urban areas of Bristol, Bath and Weston-S Mare. Locations with sustainable access to southern parts of Bristol and to Weston-super-Mare are a particular priority in light of the ‘strategic rebalancing’ priority.

27. The underlying objective is to avoid Green Belt locations as far as possible but because some of the most sustainable locations at these places lie partly within the Green Belt and because the exceptional circumstances to alter Green Belt have already been established, these proposals will require the Green Belt to be amended in three locations: Keynsham, Coalpit Heath and Yate/Sodbury.

Nailsea/Backwell (up to 3,600 dwellings)

28. Nailsea/Backwell is located on the outer edge of the Green Belt, physically close to Bristol and with strong economic links but will require transport infrastructure investment such as metrobus to significantly improve connectivity and maximise opportunities for sustainable travel. Nailsea is a town where there is an existing objective to improve the mix and balance of housing and support existing and new services, jobs and facilities. Any growth needs to be carefully integrated to ensure that the existing services and facilities would help support the new development and benefit from the opportunities generated. Development is anticipated to take place generally to the west of Nailsea and Backwell which will bring significant challenges in terms of transport delivery, but avoids the Green Belt and principal flood zone areas.

Keynsham (up to 1,100 dwellings)

29. This location performs well in the Sustainability Appraisal and will also be effective in helping to deliver the Plan’s Strategic Priorities, being a town expansion situated on a strategic transport corridor well related to Bath & Bristol. The proximity to central Bristol and its links to Bath provide the opportunity to exploit both existing and potential new sustainable transport infrastructure including conventional bus corridors, Park & Ride, the Bristol to Bath Railway line, the Bristol-Bath cycleway, and future MetroBus or rapid transit. However, any development in this location is dependent on the timely provision of significant new transport measures to enable new growth and to mitigate existing congestion. This includes new road
infrastructure where appropriate to serve any future development at this location and ease pressure in the town centre.

30. Whilst part of this location lies outside the Green Belt, the majority falls within the Green Belt but there are exceptional circumstances to justify removing the rest of the location from the Green Belt in light of its relative Green Belt performance against other Green Belt locations and its highly sustainable location. Development in this location will need to relate well to the existing settlement and take account the views from the Cotswolds AONB. The capacity of the site is constrained by the floodplain and the need to respect the separate integrity of Keynsham and Saltford.

**Yate/Sodbury Strategic Corridor** (up to 2,600 dwellings)

31. Strategic Growth would consolidate longer term role as one of the principal market towns in the sub-region benefiting from existing accessibility and service provision as a significant urban centre, particularly the area's accessibility by rail. Alongside Coalpit Heath growth would support investment into rail and Metrobus extension along the A432 Badminton Road, improving access to Bristol City Centre, the Bristol North Fringe, Science Park and Emersons Green Enterprise Area. Long-term term phased greenfield development would also support investment in regeneration and the town centres improving the range and type of jobs and helping to unlock potential brownfield development at the western gateway. Whilst part of this location lies outside the Green Belt, the majority falls within the Green Belt but there are exceptional circumstances to justify removing the rest of the location from the Green Belt in light of its relative Green Belt performance against other Green Belt locations and its highly sustainable location.

**Coalpit Heath** (up to 1,500)

32. Coalpit Heath offers close proximity to the Bristol North Fringe, Science Park and Emersons Green Enterprise Area. Strategic development along the A432 Badminton Road, in combination with further growth at Yate / Chipping Sodbury would support investment into rail at Yate and Metrobus. It would also support existing and provide new services / facilities and employment opportunities in the locality. Whilst this location lies within the Green Belt there are exceptional circumstances to justify removing the rest of the location from the Green Belt in light of its relative Green Belt performance against other Green Belt locations and its highly sustainable location.

**Thornbury** (up to 600 dwellings)

33. Additional development that consolidates / completes expansion to east of the town, appropriate to continue the revitalisation of the town centre and strengthen local services. Also provides additional opportunity for investment and provision of new local employment and will assist the case for Metrobus to improve access to BNF and Science Park
Together, these locations can sustainably provide up to another 9,400 dwellings, totalling 93,400 dwellings, leaving 11,600 to find.

**C: Other sustainable settlements outside the Green Belt**

**Weston-super-Mare: M5 to A38 Transport Corridor** (up to 5,400)

35. Whilst being part of the Bristol HMA, Weston-super-Mare is a major urban area with its own travel to work area. Further expansion of the Weston urban area is severely constrained by topography, the AONB, the M5 and the flood plain. One potential opportunity is to expand to the east along the M5 to A38 transport corridor.

36. Development in this general location provides the opportunity to significantly upgrade the transport infrastructure on this corridor as part of an overall objective of improving the A38 south of Bristol and improving connectivity for the Airport. This would target the A38 route to the south of the Airport, improving accessibility for economic development and access to new jobs to the south and east of Bristol. It creates potential improvements to M5 access at Weston, relieves pressure on A370 corridor and addresses long standing community impacts, notably a bypass to alleviate congestion in Banwell. As further growth at Weston is highly constrained by topography, flood plain and significant highway capacity issues, this provides an opportunity to provide future growth to meet Weston’s needs, linked to the existing urban area by transport improvements. Significant mitigations including public transport improvements, multi-modal links, park and ride improvements and highway links would need to be delivered in advance to support this location.

37. In line with the Strategic Priority to retain the integrity of the Green Belt, which reflects the national priority to safeguard Green Belts, all sustainable options need to be exhausted before Green Belt locations are selected. Other sustainable non-Green Belt opportunities are outlined below.

**Charfield** (up to 1,000 dwellings)

38. This provides an opportunity to enhance the sustainability of a key settlement in the north of South Gloucestershire through growth supported by new services, facilities and employment opportunities. Charfield is situated on an existing live railway line. Whilst the station is currently closed any additional housing in this location could support a case for potentially reopening the station and rural bus improvements. Significant highway infrastructure may also be required. It also assists addressing housing needs in the north of the district.

**Buckover Garden Village** (up to 2,200 dwellings)

39. An opportunity has recently emerged beyond the Green Belt in South Gloucestershire for a potential new garden village settlement (up to 3000 dwellings)
located to the east of Thornbury. This location provides the opportunity to deliver the first locally led garden village for West of England in 21st Century. It could help the case for a step change in public transport to the locality, linking to Metrobus routes to enable access to the major employment centres of North Bristol.

40. Significant highway infrastructure, including the strategic road network (M5), may also be required. It also potentially broadens the range of housing supply in the sub-region via a single ownership with genuinely visionary approach to place making and land value capture. Alongside planned expansion at Charfield it would also provide the opportunity for the local communities in the north of the district to meet housing pressures in a planned sustainable way. Buckover is also a potential growth point for any future Oldbury NNB.

**Other locations rejected**

41. The other locations in Annex 1 outside the Green Belt are not consider appropriate for strategic growth for the reasons set out in Annex 3.

42. The above locations beyond the outer Green Belt boundary can sustainably provide up to another 8,600 dwellings, totalling 102,000 leaving around 3,000 dwellings still to find.

**D: Green Belt locations**

43. Therefore, in light of the strong evidence underpinning the most sustainable pattern of development outlined above, it is recognised that consideration needs to be given to Green Belt locations and specifically the case to consider locations in close proximity/well related to existing urban centres. However this needs to be undertaken in the context of the Plan’s overall priorities and spatial objectives at set out above.

44. The possible opportunities for strategic growth in the Green Belt are included in Annex 1. The Strategic Priority to focus investment at under-performing parts of sub-Region to help reduce inequality across the sub-region which favours growth in southern Bristol and particularly the locations at south of Whitchurch Village, Ashton Vale and Hicks Gate over those in the north of the urban area.

45. It is evident from the Green Belt stage 2 assessments that the part of Ashton Vale that lies within the City boundary and is inside the South Bristol Link Road makes only a limited contribution to the Green Belt compared to other Green Belt locations. This location would accommodate around 400 dwellings and whilst not strategic in size, it could contribute to non-strategic growth within Bristol, see para 4.

46. In comparing the 3 southern potential urban extensions, greater harm would be caused to the Green Belt by the release of Ashton Vale (outside the South Bristol Link road) and Hicks Gate compared to Whitchurch. Furthermore, the cumulative
impact of the release of three locations from the Green Belt in this very sensitive part of the Green Belt between Bristol & Keynsham is substantial.

47. Therefore, it is concluded that because of the substantial sub-regional housing need, combined with the relatively sustainable nature of its location, the contribution that could be made to improving sustainable transport options south east of Bristol, as well as its relative performance in Green Belt terms constitute the exceptional circumstances to justify the release of land south of Whitchurch Village from the Green Belt.

48. However, this location (as with other locations being considered) is only deliverable if substantial new sub-regional and local transport infrastructure is provided, focussing on public transport, including conventional bus service upgrading, new park & ride, and future Metrobus or rapid transit provision. Additional highway capacity would also be needed, to address underlying congestion issues, to provide access to new development and to release space for public transport improvements. The location’s capacity must take into account the need to avoid unacceptable harm to nationally important heritage assets as well as retaining the Green Belt separation of Whitchurch Village from the Bristol Urban area.

49. This location has the capacity to contribute up to 3,500 dwellings to housing land supply which would be sufficient to meet the housing target as well as provide some flexibility/safeguarded land.

STAGE 5 : REFINEMENT OF THE SPATIAL STRATEGY

50. Following public consultation the emerging spatial strategy will be reviewed and refined in light of responses received and any significant new evidence. This will include;

   a. Confirmation that the overall housing distribution for each UA is deliverable. This includes the provision of transport infrastructure,
   b. Ensuring the availability of a 5 year housing land supply (HLS)
   c. The need for a Contingency or to consider the scope to safeguard land for the long term under NPPF para 85
   d. Comments on alternative locations or strategies being promoted, evidence in relation to housing requirement or economic growth.
## ANNEX 1 LIST OF POTENTIAL LOCATIONS ASSESSED

<table>
<thead>
<tr>
<th>Typology</th>
<th>Location Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban Intensification</td>
<td>Bristol, Bath, North &amp; East Fringe, WSM</td>
</tr>
<tr>
<td>Sustainable Transport corridors</td>
<td>Salford, Thornbury, Nailsea/Backwell, Backwell, Keynsham locations, Yate/Sodbury strategic corridor (Yate/ Chipping Sodbury/), Winterbourne, Frampton Cotterell and Coalpit Heath A38 strategic growth Banwell/Churchill</td>
</tr>
<tr>
<td>Expansion around Bristol &amp; Bath</td>
<td>Longwell Green, Hambrook, Severnside, Bridge Yate / Oldland Common, Kingswood / Warmley, West of Twerton, Ashton Vale, SE Bristol Hicks Gate, SE Bristol Whitchurch</td>
</tr>
<tr>
<td>Other Settlements/locations</td>
<td>Charfield, Buckover Garden Village, Yatton, Long Ashton, Portishead, Easton-in-Gordano, Clutton/Temple Cloud locations, North of M4/M5, Somer Valley Locations (Radstock, Westfield, Mid. Norton, Paulton, Peasedown St John), Pucklechurch, M4 to Shortwood, Congresbury, Olveston, Wickwar, Alveston, Almondsbury / Hortham,</td>
</tr>
</tbody>
</table>
## ANNEX 2: STRATEGIC PRIORITIES & CRITICAL ISSUES

<table>
<thead>
<tr>
<th>Critical Issue</th>
<th>Strategic Priorities</th>
</tr>
</thead>
</table>
| The national housing crisis is a particular problem in the WoE & the NPPF requires that LAs plan positively for development and meet the full needs | 1. **Social**: To identify a sufficient supply of land to meet the full need for housing and ensure that the JSP benefits all sections of the communities, in particular by boosting growth opportunities in the south of the sub-region in order to re-balance the economic benefits between the north and south of the WoE.  
2.                                                                                                                                                                 |
| The economic prosperity of the WoE should be maintained due to the substantial benefit it brings to the residents, communities & the environment | 3. **Economic**: To accommodate the economic growth objectives of the LEP Strategic Economic Plan and identify sufficient land to meet the economic growth of both existing employment centres such as the Enterprise Zone/Areas and in new locations which will most successfully deliver appropriate scale and type of jobs.  
4.                                                                                                                                                                 |
| There is significant pressure on infrastructure, especially transport which inhibits wealth creation and productivity. Current unsustainable patterns of travel are a significant cause of climate change and poor health | 5. **Infrastructure**: To ensure Infrastructure is aligned with development in a timely way and addresses existing challenges and creates capacity for sustainable growth. Strategic development should be in locations which maximise the potential to reduce the need to travel or where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, |
| The sub-region benefits from a world class environment which brings substantial economic and community benefits and contributes significantly to the quality of life of residents, visitors and businesses. | 6. **Environment**: To protect and enhance the sub-region’s diverse and valuable environment and ensure resilience to future development and the impacts of climate change. |
ANNEX 3: LOCATIONS NOT SELECTED FOR STRATEGIC GROWTH

Yatton
Yatton is a very constrained location in terms of transport, flood risk, ecology and transport. The location was tested through the transport modelling and performed poorly as highway trips would have a disproportionate impact on the network as a result of long distances to all destinations and would require expensive mitigation—river and rail crossing. Surrounded by low lying land at risk of flooding.

Long Ashton
The principal area of potential development to the south is separated from Long Ashton by the railway and is difficult to integrate into the existing settlement because of severance issues. It is a sensitive part of the Green Belt valued by the local community. Long Ashton is relatively close to Bristol, so there is an opportunity to maximise cycling and use of metro bus. There are also existing transport constraints relating to congestion at the M5 J19.

Portishead
Portishead is a very constrained location in terms of transport, Green Belt, flooding and ecology. Whilst there is opportunity afforded by Portishead line rail re-opening, there are major capacity constraints at M5 J19.

Easton-in-Gordano/Pill
Easton-in-Gordano is a very constrained location in terms of transport, Green Belt, heritage, landscape and ecology. Whilst there is opportunity afforded by the Portishead line rail reopening, there are major capacity constraints at M5 J19.

Clevedon
Clevedon is very constrained in terms of flood risk to the south and east and topography and landscape to the north. The levels landscape is also particularly sensitive both for its own characteristic value and ecological contribution as well as potential for adverse ecological impacts on the coastal habitat to the south of Clevedon. Any new development to the east of M5 would be physically separated from the existing town. Strategic development was also shown to be quite problematic in transport terms in this location with additional trips on the M5 and contributing to congestion on more localised routes.

NW Saltford
This location does not make the threshold for strategic development location. However, it has potential as a non strategic growth location to be explored through the review of the B&NES Core Strategy. The location lies within the Green Belt.

West, South West & SE Keynsham
These locations do not perform well in the Sustainability Appraisal. It would be difficult and costly to mitigate the negative impacts of development in this location. The location lies within the Green Belt.

SW Saltford
This location does not perform well in the Sustainability Appraisal. It would be difficult and
costly to mitigate the negative impacts of development in this location. The location lies within the Green Belt.

**Somer Valley**
The Somer Valley is one of the least sustainable locations in the sub-region for accommodating strategic housing growth. There is already a substantial imbalance in the number of workers who reside in the town and the employment available and this will be exacerbated in light of existing residential commitments. It has also proved difficult to attract new employment to the area and jobs have been steadily eroded over recent years. Therefore, strategic new housing growth will inevitably lead to substantial out-commuting. Transport modelling shows that seeking to mitigate this will be difficult, costly and only partially effective. The purpose of the new Enterprise Zone is to facilitate employment generation to help mitigate the existing high levels of out-commuting.

**Clutton and Temple Cloud**
Sites in Clutton & Temple Cloud do not perform well as sustainable locations for accommodating strategic housing growth in the sub-region. The majority of new residents are highly likely to seek to travel by car to work and other activities. Transport modelling shows that seeking to mitigate this will be difficult, costly and only partially effective.

**West of Twerton, Bath**
Based on the SA the significance impact that development of this scale and this location would have on World Heritage site and its setting has led to this full site not being considered as a reasonable option. The severity of harm caused by development in this location would significantly outweigh the benefits. It would cause significant harm to the setting of the WHS and whilst it is not in the AONB, it is on the edge of Bath and is visually prominent, thereby causing harm to the AONB. As such development would contradict national policy. It also performs very strongly in Green Belt terms. Therefore this location is not suitable for development in the plan period.

**SE Bristol Hicks Gate**
Whilst this location performs well in the Sustainability Appraisal, and would be effective in helping to deliver the Plan’s Strategic Priorities, it lies in a very sensitive part of the Bristol and Bath Green Belt which makes a major contribution to preventing the merger of Bristol and Keynsham.

**Ashton Vale**
The Green Belt at Ashton Vale (outside the South Bristol Link) makes a major contribution to Green Belt purposes. It is an area of attractive countryside and a sensitive landscape in relation to, in particular, Ashton Court and Dundry Hill and has ecological importance. It provides the landscape setting to Bristol and for rural communities within North Somerset and plays a significant role in protecting the countryside from encroachment of development. Protecting high quality environment is a priority of the plan. The location was tested through the transport modelling and performed well in terms of potential accessibility by non-car modes given its proximity to Bristol. There are also existing transport constraints relating to M5 J19.
Kingswood/ Warmley
Some 13,500 dwellings also remain to be constructed on land allocated in the South Gloucestershire Local Plan & Core Strategy across the Bristol North & North East Fringe communities over the next 10-15 years. Further strategic growth in the locality is likely to undermine delivery of these key sites. Moreover Bristol has historically predominantly grown north & eastwards. Strategic growth in the locality towards and also up the escarpments would significantly add to the impression of sprawl undermining the objectives of the Green Belt. Notwithstanding this, significant growth will severely exacerbate congestion and air quality issues along the A420 corridor into Bristol. Road space along the A420 is significantly constrained by the nature of built form limiting the potential for necessary substantive strategic public transport, walking and cycling interventions along it. The locality is also poorly related to major areas of employment. Strategic growth would also further divorce existing communities to the west from physical and visual access to the countryside and potentially impact on Siston Conservation Area, Siston Lane and Webbs Heath areas of landscape value as well as local ecological interests.

North of M4/M5
Some 13,500 dwellings also remain to be constructed on land allocated in the South Gloucestershire Local Plan & Core Strategy across the Bristol North & North East Fringe communities over the next 10-15 years. Further strategic growth in the locality is likely to undermine delivery of these key sites. Moreover Bristol has historically predominantly grown north & eastwards. Strategic growth in the locality would also therefore significantly add to the impression of sprawl significantly undermining the objectives of the Green Belt. Notwithstanding this, although the locality is in close proximity to existing strategic employment locations the location lacks good connections. Strategic growth would be severed from the existing urban area by the motorway therefore limiting options in terms of new connections. Strategic growth would therefore have a severe impact on Hortham village and J16 being in such close proximity. Strategic growth would also divorce existing communities from access to the countryside and maturing recreational opportunities, important to support existing residential and employment areas in the north Bristol fringe.

Pucklechurch & M4 to Shortwood
Some 13,500 dwellings also remain to be constructed on land allocated in the South Gloucestershire Local Plan & Core Strategy across the Bristol North & North East Fringe communities over the next 10-15 years. Further strategic growth in the locality is likely to undermine delivery of these key sites. Moreover similar to significant growth at Kingswood/Warmley, strategic growth will severely exacerbate congestion and air quality issues along radial routes into Bristol, where road space is significantly constrained by the nature of built form so limiting the potential for necessary substantive strategic public transport, walking and cycling interventions. The locality is also less well related to major areas of employment than proposed growth points at Yate & Coalpit Heath. Strategic growth would also further divorce existing communities from physical and visual access to the countryside and potentially impact on Siston Conservation Area. Development between Pucklechurch and the East Fringe is also highly constrained by its topography, ecological and archaeological interests. Significant development in the locality up these escarpments would thus significantly add to the impression of sprawl and separation in the locality undermining the
objectives of the Green Belt. Pucklechurch itself may have potential for some non-strategic growth to support local services. To be considered through the Local Plan process.

**Olveston**
Olveston is surrounded by high quality landscape, ecological and heritage assets. Access is along ‘lanes’. This village is not considered suitable for strategic level growth but may have potential for some non-strategic growth to support local services. To be considered through the Local Plan process.

**Wickwar**
Major strategic growth is not considered appropriate due to areas of important landscape, heritage and ecological value to the north, northwest and east. The village is also less well related to major areas of employment than proposed growth points at Yate & Coalpit Heath. Strategic growth would be car based with limited opportunity to improve public transport options, thereby also impacting on other settlements on route to higher order localities and the strategic transport network. However the village may have potential for some non-strategic growth to support local services. To be considered through the Local Plan process.

**Alveston**
Major strategic growth is not considered appropriate due to areas of particular landscape and heritage value to the north, northeast and west. The A38 would sever development to the southeast from the village. Development to the north would also compromise separation from Thornbury undermining green belt objectives. The settlement / locality is therefore not considered suitable for strategic level growth but may have potential for some non-strategic growth to support local services. To be considered through the Local Plan process.

**Almondsbury**
Some 13,500 dwellings also remain to be constructed on land allocated in the South Gloucestershire Local Plan & Core Strategy across the Bristol North & North East Fringe communities over the next 10-15 years. Further strategic growth in the locality is likely to undermine delivery of these key sites. Moreover major strategic growth is not considered appropriate due to the village being constrained by noise, pylons, solar park and proposed air ambulance site to its south / southeast and high landscape value / slopes towards the Severn Vale to its northwest. Similar to land north of M4/M5, strategic growth would also have a severe impact on Hortham village and J16, being in such close proximity. Bristol has also historically predominantly grown north & eastwards. Strategic growth would thus also significantly add to the impression of sprawl in the locality significantly undermining the objectives of the Green Belt. Therefore, the settlement/locality is not considered suitable for strategic level growth but may have potential for some non-strategic growth to support local services. To be considered through the Local Plan process.

**Longwell Green**
Land at Longwell Green essentially comprises slopes and hilltop with Hanham Abbots Conservation area to the south. This area is an important physical and visual asset with extensive views to and from it to surrounding urban areas. Strategic growth over this area

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would significantly add to the impression of sprawl undermining objectives of the Green Belt.

**Hambrook**
Some 13,500 dwellings also remain to be constructed on land allocated in the South Gloucestershire Local Plan & Core Strategy across the Bristol North & North East Fringe communities over the next 10-15 years. Further strategic growth in the locality is likely to undermine delivery of these key sites. Moreover the area is located between the M4 motorway and ring road, severing it from existing communities and suffering from noise and fumes. Hambrook village is also a conservation area with a number of heritage assets. The settlement / locality is therefore not considered suitable for strategic level growth but may have potential for some limited non-strategic growth to support local services. To be considered through the Local Plan process.

**Bridge Yate / Oldland Common**
The locality is characterised by the escarpment and ridgeline running along its length forming the ‘natural’ edge to the Bristol urban area. A pylon, abattoir and conservation area, archaeological and ecological interests are also present. The escarpments and ridgelines that frame / contain this part of Bristol East Fringe also protect the setting of the AONB. Bristol has also historically predominantly grown north & eastwards. Significant development in the locality up these escarpments would thus significantly add to the impression of sprawl in the locality undermining the objectives of the Green Belt. Strategic growth would also further divorce existing communities from physical and visual access to the countryside. Therefore, this locality is not considered suitable for strategic level growth but may have potential for some non-strategic growth to support local services. To be considered through the Local Plan process.

**Severnside**
Comprising Severnside employment areas, Severn Beach, Pilning and Easter Compton. The locality is characterised by the Severn Estuary and the Vale hinterland. With the exception of Easter Compton the locality is predominantly flood zone 3 and provides important habitats for birdlife and other wildlife (designations comprise RAMSAR, SPA, SAC & SSSIs). Strategic pylons and pipelines also intersect the locality. The Severnside 1957/58 employment consent covers much of the area and remains to be completely built out. Therefore, the locality is not considered suitable for strategic level residential growth but may have potential for some limited non-strategic growth to support local services. To be considered through the Local Plan process.