

## SOUTH WEST DRAFT REGIONAL SPATIAL STRATEGY

# EXAMINATION IN PUBLIC

## Panel Note 2 - Programme of Development Areas

### Response by the Shortwood Landowners Group Area of Search C - Shortwood, Bristol

1. This is a response to Panel Note 2 made on behalf of the Shortwood Landowners Group (SLG).
2. SLG has commissioned the following technical reports to help address the questions raised by the Panel Note and to provide background technical information to assist the EiP process:
  - Cotswolds Archaeology – Archaeological Implications;
  - Aspect Ecology – Ecological Implications;
  - Pegasus Planning Environmental – Landscape Assessment;
  - Key Transport Limited – Transport Implications;
  - Reading Agricultural Consultants – Agricultural Land Classification;
  - Pegasus Planning Group – Green Belt Assessment;
  - Peter Finlayson Associates – Flooding Risk;
  - Peter Finlayson Associates – Services and Utilities;
  - Peter Finlayson Associates – Ground Conditions and Related Matters;
  - Pegasus Planning Urban Design – Framework Masterplan;
  - Pegasus Planning Group – Sustainability Assessment and Deliverability.
3. The technical reports have been completed in draft form and, following a period of consultation with the relevant bodies and authorities, will be made available in full for the EiP. The matters studied have been selected in order to identify whether there are any constraints that could delay or limit the deliverability of an Urban Extension within the Area of Search in accordance with the timescale set by RSS.
4. In order to address the issues raised by the Panel Note a brief summary of the findings to date are set out below:

### ***Archaeology***

5. An initial review of the sources has shown that no overriding constraints to the deliverability of the majority of the site for residential development are present. Provision will be made for the preservation *in situ* of the Scheduled Monuments and Listed buildings, and consideration will be made of their setting. No development is proposed within the Conservation Area at Siston, which includes a belt of land around the village itself. The setting of this area will be considered, with current proposals comprising the planting of a 10m belt of trees around its limits to minimise views of the proposed development from Siston. This, together with sensitive design within the development, is likely to adequately minimise the impact upon the setting of the Conservation Area.
6. Further analysis will be carried out to define the archaeological potential of the site, but at this stage there is currently no evidence to suggest that other remains of national importance, which would merit preservation *in situ*, are present.

### ***Ecology***

7. From the information available from the desk study exercise it appears likely that much of the site is comprised of habitats such as agricultural land, hard standing and buildings that are generally of limited ecological value. Nonetheless, a number of potential ecological constraints have been identified within the site boundary, which should be taken into account when considering the potential layout of any development proposals at the site. These constraints are centred on the presence of a number of SNCIs within the site, with further potential identified for the site to support additional habitats of ecological value such as woodlands, hedgerows and trees, along with protected species such as bats, Badger, reptiles, Water Vole, Great Crested Newt and nesting birds.
8. It is therefore recommended that this potential is verified through field survey work and should any habitats of significant nature conservation interest or protected species be identified, appropriate measures put in place to safeguard these under any proposals.

### ***Landscape***

9. The development proposals would incorporate measures to protect and retain important landscape features. The proposals would seek to positively enhance and extend these landscape features, using plant species and materials which are indigenous to the area.
10. It can be therefore be demonstrated that the site has the capacity to accommodate the proposed development without harm to the aims and objectives of the Green Belt.

### ***Transport***

11. The Area of Search enjoys a major benefit in transport infrastructure terms – it sits alongside, and can be easily connected to a high standard dual carriageway that provides a convenient access route for development purposes. Hence, from a transport perspective, development does not need to be delayed to wait for major road infrastructure to be introduced. It is therefore, reasonable to assume that by the time the land has been allocated in the development plan process and granted planning consent, it can be made ready from a construction perspective for an immediate start on development.
12. Three accesses into the development, at the Shortwood Hill/A4465, Carsons Road and the A420 west of Bridgegate, can be achieved very early in the development programme, releasing, say, up to one third of the site for early development, without causing too great an impact in any single location.
13. With emphasis placed upon promoting walking, cycling and public transport, and upon containment of trips within the development, it would be important to introduce the associated internal connecting infrastructure and some local amenities (shops/pub/health care) early in the development programme. Similarly, a connecting bus/cycle route to Emersons Green and pump priming of bus services would be needed relatively early, to promote and instil a culture of bus use by residents and visitors. In broad terms this would be the second phase of development.
14. With interconnectivity within and through the site, it would then be reasonable for the largest part of the development to proceed, incrementally building the planned network of streets. At about the same time, the off site improvements to the Ring Road would be implemented, to provide additional capacity on the wider highway

network. However, it would not be appropriate to release this capacity too early, as traffic congestion provides a “stick” to partner the “carrot” of easy travel by bus, so maintaining the motivation for new residents and visitors to travel by means other than the car.

15. The timing of opening the new junction proposed on the Avon Ring Road south of Pomphrey Hill may be determined by the ability of the Dramway roundabout to handle the development traffic. The current assumption is that with a good deal of spare capacity at the Dramway roundabout, this may be relatively late in the development programme. However, it is likely to provide a convenient connection into a significant central portion of the development area, and a new crossing of the Ring Road for buses, so it may be appropriate to advance its construction to an earlier phase.
16. During construction, inappropriate use of unsuitable existing roads such as Shortwood Hill, Siston Common, Goose Green and Webbs Heath, by construction and development traffic will be prevented by weight restrictions, traffic management and, in some cases, closure to through traffic.

### ***Agricultural Land Quality***

17. The highest quality agricultural land is probably limited to the small areas of Sherborne and Neath soils. These are the driest and most easily worked of the soils thought to be present in the area. Worcester soils are frequently limited by steep gradients, but otherwise are probably of mixed or uncertain quality. The Denchworth and Dale soils are wet and clayey, and probably are not of best and most versatile quality. Land with gradients steeper than 7° (1 in 8) cannot be classified as best and most versatile quality due to limitations to mechanised operations.
18. These findings are summarised in Table 2, and descriptions of the ALC grades is given in Appendix 6.6. The probable distribution of land quality is mapped on Figure RAC5.

**Table 2. Approximate areas of probable land quality**

	<b>Ha</b>	<b>%</b>
Mostly best and most versatile land	40	5
Mixture of qualities	225	40
Mostly not best and most versatile land	320	55
<b>Totals</b>	585	100

N.B. percentages rounded

### ***Green Belt Assessment***

19. The Area of Search is currently within the Bristol and Bath Green Belt; the primary purpose of which was to stop the coalescence of the cities of Bristol and Bath and to stop the continued urban sprawl of the cities that threatened the coalescence with other smaller towns including Chipping Sodbury, Clevedon, Nailsea, Portishead, Thornbury and Yate.
20. The Area of Search can be released from Green Belt without detriment to the original purpose of the Green Belt or the purposes defined by PPG2. It will not lead to coalescence with any existing towns, will not extend Bristol further towards Bath than existing developed areas and will be well contained by natural features and landscape / conservation designations that will enable the definition of a long term and defensible boundary to the Green Belt. Whilst the village of Pucklechurch is not a town and does not fall under the PPG2 definition, the proposed Green Belt Boundary will, in any event, maintain its separate identity now and in the long term.
21. The additions to Green Belt proposed by Draft RSS, in particular at Yate and Chipping Sodbury, will result in the quantum and width of the Green Belt being generally unaltered. The Green Belt will thus continue to perform the functions defined by PPG2 and will maintain the primary functions set at its inception in 1965.

### ***Flood Risk***

22. The overall conclusions of this desk study are that the flood risk is minimal provided that Sustainable Urban Drainage Systems (SUDS) are used to mitigate the effect of increased impermeable area as a result of development taking place. Where ever possible SUDS should incorporate 'at source' infiltration however it is acknowledged that parts of the study area are underlain by impermeable ground conditions which

render this option impractical. In these areas surface water run-off will need to be conveyed to locations where the ground conditions are favourable to infiltration or stored to reduce the rate of discharge to areas downstream.

***Services and Utilities***

23. The overall conclusions of this desk study are that the ground conditions do not pose any insurmountable problem for development to take place. The underlying ground strata is largely clay-based which will impose limitations on drainage arrangements which depend on permeability for disposal.

***Ground Conditions***

24. The overall conclusions of this desk study are that the utilities required to serve the development within the study area can be readily made available.

***Development Framework***

25. Having taken into account all of the above we have produced the Development Framework Plan attached at appendix 1. This illustrates:

**Land Areas / Sustainable Urban Extension**

<b>Use</b>	<b>Hectares</b>	<b>Notes</b>
<b>Residential</b>	196.97	7898 dwellings at 40dph - including children’s play areas (14.5ha)
<b>Public Open Space</b>	28.94	Playing fields - based on NPFA standards
	175.99	District park/existing woodland/informal recreation/common land
<b>Education</b>	9.95	Secondary School - size calculated using DfES standards
	8.96	5 no. primary schools
<b>District Centre</b>	6.06	Suitable to support retail, community and medical facilities and services
<b>Employment</b>	24.89	Based on 5,000 B1 jobs

Additional jobs in schools and district centre

<b>Park and Ride</b>	2.54	Up to approximately 750 spaces
<b>Total</b>	<b>454.30</b>	

26. This confirms that within the identified features and constraints, a sustainable mixed use development can be designed that meets the requirements of Draft RSS.

***Delivery Timescale***

27. The Area of Search could be made available for development within a very short timescale. It is currently controlled by the Shortwood Landowners Group (a consortium of 5 major landowners who control over 450 acres of land), by Bloor Homes who control a major part of the site adjacent to the A420, and a number of smaller land owners who are in discussion with the Landowners Group.

28. The major constraint to the delivery of the site is the development plan system. South Gloucestershire Council has been directed by the Government to submit their Core Strategy DPD no later than 31<sup>st</sup> July 2009 and their Site Allocations DPD by no later than 30<sup>th</sup> June 2010.

29. However, South Gloucestershire Council's Cabinet ratified a draft Local Development Scheme on 8<sup>th</sup> January that proposes the submission of the Core Strategy in February/March 2010 and advises that the Council will not even start work on the Site Allocations DPD before December 2011. It is understood that these timescales have been agreed by GoSW.

30. It is thus unlikely that the Core Strategy will be adopted until April 2011. The Council will only then commence with consultation on the Allocations DPD and it is thus unlikely that an urban extension within the Area of Search will be allocated for development until 2014 at the earliest; unless permission is granted in conformity with RSS at appeal or an alternative delivery vehicle is established as a matter of urgency.

31. In light of the need for a step change in the delivery of housing and the need to deliver the entire site by 2026, the Shortwood Landowners Group are considering the preparation an application for planning permission, to include thorough public

consultation, following adoption of RSS, with a view to submitting the application in early 2010. Assuming a 24 month determination period, to include an appeal and public inquiry, planning permission could be granted in 2012.

32. It is further assumed that there will be a 12 month period to provide services and utilities and to complete ground works necessary prior to the development of the first dwellings. It is therefore anticipated that the housing releases will commence in early 2013.
33. Assuming that the site will be developed by four national housebuilders, as Emersons Green was developed, each delivering an average of 50 dwellings per annum (DPA) out of three outlets, the site will deliver 600 dpa and therefore approximately 7,800 dwellings by April 2026.
34. It is of course likely that a development of this size would have more than one access and would commence in more than one location at a time. It is therefore possible that there will be up to eight developers selling dwellings at any one time; similar to the current development at the Haydon Sector in Swindon. The number of dpa sold would still, however, be approximately 600.

#### ***Alternative Delivery vehicle***

35. In order to avoid planning by appeal, which may be the case if South Gloucestershire Council does not amend their LDS, it is appropriate for the Panel to consider incorporating Policies within RSS that define a separate delivery vehicle for the major Areas of Search. Such a delivery vehicle could take a number of forms, including:
  - The formation of a separate delivery team comprising the Regional Assembly, RDA, GoSW, English Partnerships, Land Owners/Developers and the LPA who between them will develop a Masterplan and design Guide and then ensure the implication of the Urban extensions within the required timescale;
  - The preparation of a joint DPD between the four LPA's to allocate the Urban Extensions in accordance with RSS as proposed Paragraph 1.13 of PPS11;
  - The Election of a Mayor for Bristol who would have Strategic Planning and Transportation powers. The vehicle for the delivery of this exists with

the West of England Partnership Office (formed by merging the Joint Strategic Planning and Transportation Unit and the Joint Local Transport Plan Teams). The Mayors Office would then be responsible for implementing the RSS Strategy for the West of England, but Development Control powers would still rest with the LPA's.

### ***Summary***

36. The Area of Search is an area of undulating countryside on the urban fringe of Bristol bounded by existing built or proposed development to the North (Emersons Green), East (Mangotsfield and Kingswood) and the South (Warmley and Bridgegate). It is located in close proximity to the existing employment areas of Kingswood and Pucklechurch and the proposed strategically significant employment development, which has the benefit of Planning Permission, at Emersons Green which will offer up to 10,000 jobs. It is also in close proximity to the Emersons Green District Centre and sports facilities and Kingswood town centre that offers retail and social facilities.
37. The Area benefits from its location directly abutting the existing Avon Ring Road, to which it can easily be connected. Development, therefore, does not need to await the delivery of any major road infrastructure. Similarly, the Service and Utility infrastructure within the study area can readily be made available.
38. Vehicular access will be directly onto the Avon Ring Road and the A420. The traffic generation will be accommodated by the provision of phased improvements to the Ring Road junctions, improvements to public transport facilities including pump priming bus services, providing a bus/cycle route to the employment development at Emersons Green and providing a park and ride site adjacent to the A420.
39. The form of development will be defined by the physical features including the Siston Conservation Area and the existing reservoir and landscape topography including the Pucklechurch Ridge.
40. Initial Assessment of Archaeology, Ecology, Landscape, Agricultural quality, Flood Risk and Ground Conditions do not highlight any constraints that would unreasonably constrain the delivery of the site. The assessments will be completed in greater detail prior to the EiP.

41. The assessment of Green Belt confirms that the Area of Search can be safeguarded from Bristol and Bath Green Belt without prejudicing its purpose and that a defensible long term boundary can be defined.
42. The land area defined by the identified constraints is developable and deliverable within a very short timescale, not being dependent upon any major infrastructure provision. It can provide approximately 8000 dwellings and 5000 plus jobs in accordance with draft RSS by April 2026.
43. The only constraint to delivery is likely to be South Gloucestershire Council and their LDS, which proposes a DPD timescale that will restrict the step change in housing delivery required by draft RSS, the Barker Report and Central Government. This, however, is not surprising given that South Gloucestershire Council, although originally signed up to the Draft RSS strategy, are now one of the main objectors.
44. It is proposed that the artificial constraint proposed by South Gloucestershire Council can be overcome by either incorporating policy within RSS that encourages the release of the Area of Search ahead of the LDF or by ensuring that a separate DPD and delivery process is put in place through RSS.
45. In any event, it is clear from the technical research completed to date that the Area of Search can deliver 8000 dwellings and 5000 jobs by April 2026.