

### **Executive Summary**

- The scale of additional Greenfield land is justified against the likely level of housing requirements for both the Bristol urban area and the proposed Areas of Search. Larger Greenfield development areas would be required to accommodate increased housing requirements.
- An urban extension to the east of Bristol in Area of Search C could be delivered by the end of 2011 and would be able to contribute substantially to the RSS dwelling requirement of 400 dwellings per annum.
- There are no environmental constraints to development within the southern part of Area of Search C.
- The landscape and visual impact of development in this area would be no greater than the impact of Cadbury Heath on the wider surrounding landscape.
- The required infrastructure connections can be delivered as part of the development proposals and should be considered in relation to the surrounding area with both existing and proposed development.
- The southern part of Area of Search C is well located in relation to the existing road network. Development at this site is not dependent upon the delivery of major infrastructure proposals and would contribute to the provision of new and improved public transport schemes as proposed in the FJLTP and GBSTS.
- The revision of the Green Belt boundary in this area is justifiable and allows a substantial area of Green Belt land to be retained which would continue to perform its Green Belt functions as set out in PPG2.

**1. Introduction**

- 1.1 This submission addresses the following issues for Matter 4/1 taken from the questions posed by the Panel:

*“West of England HMA covers the urban areas of Bristol, Bath and Weston-super-Mare and also Trowbridge. Other towns referred to within the HMA include Bradford-on-Avon, Frome, Melksham, Warminster and Westbury.*

*In setting out policies and proposals for the HMA sub-region, does the draft RSS adequately deal with the following questions:*

*b) Has the scale of additional greenfield development been adequately justified against the likely level of housing requirements and in particular the urban renewal opportunities in Bristol, Bath and Weston-super-Mare?*

*c) Has sufficient consideration been given to the impact of the lead-in times for larger developments on the required annual output for the HMA?*

*d) Have environmental limits arising from matters such as flood risk and the protection of environmental assets, including the Bath World Heritage Site, been adequately taken into account?*

*e) Have infrastructure considerations been adequately taken into account?*

*f) Do the proposals adequately reflect the need to reduce the need to travel, support the use of public transport and minimise congestion and in particular do they reflect the output from the Greater Bristol Strategic Transport Study?*

*g) Are the proposed modifications to the Green Belt adequately justified?”*

## **2. Background**

2.1 JS Bloor is a national house-builder and developer. They have control over land in the east of Bristol within the identified Area of Search C. This land is located in the area indicated in Figure 1b in Appendix 1. The site has been divided for ease of reference into Site A (to the west of Webbs Heath Road) and Site B (to the east of Webbs Heath Road). This written statement should be read in conjunction with Bloor's representations made to the draft RSS and also the written statement submitted to Matters 2/1, 2/2, 2/4 and 3/5 and the following accompanying appendices:

- 1: Site Location Plan and Site Boundary Plan
- 2: Environmental Baseline Assessment
- 3: Transport Infrastructure Plan
- 4: Green Belt Assessment
- 5: Sustainability Appraisal
- 6: Concept Zoning Plan

## **3. Scale of additional Greenfield development**

- 3.1 Terence O'Rourke's written submissions to Matters 2/1, 2/2 and 2/4 provide the strategic case for an overall increase in housing numbers throughout the region and in particular the SSCT's. Larger areas of additional Greenfield land would therefore be required if the housing figures are to be increased in the final RSS.
- 3.2 In terms of justifying the current scale of additional Greenfield development against the likely level of housing requirements with particular regard to urban renewal opportunities in Bristol, we are of the opinion that in the case of Bristol, the scale of additional Greenfield development identified in the Areas of Search is justified against the current likely levels of housing provision.
- 3.3 Much of the programmed housing provision within Bristol is in the form of high-density flatted developments. Bristol City cannot rely on high-density flatted developments to satisfy RSS requirements although these high-density developments will continue to instigate regeneration and renewal throughout the city and suburbs. The scale of additional Greenfield land identified within the Areas of Search around Bristol can therefore be justified against the likely level of housing requirements for lower density houses and family homes. Development of Greenfield land as sustainable urban extensions to Bristol would not hamper urban renewal opportunities, but would in fact contribute to regeneration initiatives by providing an increased population who would make use of the city's services and facilities.

#### **4. Programming and delivery of development**

4.1 With regard to the impact of lead-in times for larger developments on the required annual output for the HMA, Bloors has identified two initial options for the programming and delivery of development to the east of Bristol. These are to:

1. Progress development through South Gloucestershire's Local Development Framework (two sub-options)
2. Submit a planning application following publication of the RSS Panel Report.

##### *1. Progress development through South Gloucestershire's LDF*

4.2 If development were to be progressed through the South Gloucestershire LDF, the lead-in times would be significantly delayed by the development plan process. South Gloucestershire are not expected to have an adopted Core Strategy until April 2011 and work on the Issues & Options of the Site Specific Allocations is not expected to start until December 2011. On average it can be assumed that DPD's take around three years from Issues and Options to adoption and therefore there would not be the necessary Site Allocations DPD in place until at least 2014.

4.3 There are two potential options to progress through the LDF route. One is to prepare an Area Action Plan on the back of an adopted Core Strategy, which an outline planning application could be submitted during 2011.

4.4 The alternative LDF route is to wait for the Site Allocations DPD before submission of a planning application. A planning application would therefore not able to be submitted until 2014/15.

4.5 Assuming a three month determination period, the earliest an outline planning permission could be in place is mid 2012. This is dependent upon the support of the local planning authority in drawing up and agreeing to an AAP.

##### *2. Submit a planning application following publication of the RSS Panel Report*

4.6 If the RSS route is taken, an outline planning application could be submitted soon after the publication of the Panel Report, which is due October 2007. A planning application could therefore be submitted early 2008, depending on completion of the necessary environmental survey work.

4.7 Allowing for call-in or appeal, the determination period could be around 12 months, depending on the resources of the Planning Inspectorate. An outline planning permission could therefore be in place by early 2009.

*Commencement of development and dwelling completion*

- 4.8 Assuming a period of 2 years between the issue of outline planning permission and commencement on site (allowing for discharging of conditions, approval of reserved matters and pre-commencement works), the earliest development could commence is early 2011. Allowing 6 months for the first completions, the first dwellings would be ready mid 2011.

*Required annual output*

- 4.9 The southern part of Area of Search C is therefore able to be delivered by mid-end 2011 and would therefore be able to contribute substantially towards the RSS dwelling requirement of 400 dwellings per annum for the north and north-east Bristol Area of Search from 2011 onwards.
- 4.10 There is an element of delay in delivery with the identified options above and therefore Bloor's would be happy to discuss alternative delivery options with the relevant authorities and organisations to ensure the timely delivery of housing.

**5. Environmental considerations**

- 5.1 Environmental constraints and opportunities within and surrounding the site, have been closely considered as part of an environmental baseline assessment. The assessment is set out in detail in Appendix 2. The environmental issues were scoped against the SSA of the SWRSS and the South Gloucestershire Local Plan.
- 5.2 The environmental issues considered are: natural heritage; land-use; landscape and visual; cultural heritage; hydrology (flood risk and water resource protection); ground stability and contaminated land. A summary of the environmental baseline is set out below:

*Natural Heritage*

- 5.3 The site has been screened for both statutory and non-statutory designations to establish whether development is likely to impact on natural heritage. An initial survey has shown that there are no areas within or in close proximity to the site, which have been given statutory protection due to their natural heritage value.
- 5.4 The Bristol Environmental Records Centre (BRERC), have been consulted as part of this assessment and a number of features at a local level have been identified. These are discussed in more detail in Appendix 1, which highlights the opportunities available to maintain and increase biodiversity as part of the development. Overall there are no major constraints to development in relation to natural heritage.

- 5.5 Appendix 2 figure 2a, and figure 2b give a visual representation of natural heritage designations in the wider landscape, and at a local level respectively.

*Land Use*

- 5.6 An initial assessment of the land within the Site, has identified that the majority of the land has been graded as 3b under the Agricultural Land Classification (ALC), and is therefore suitable for development in line with Government Planning Policy Statement 7 (PPS7) 'Sustainable Development in Rural Areas'. There is a parcel of land in the eastern section which has not been resurveyed since the original maps were produced, however it seems probable that the land in this area would also come under grade 3b. It is considered that the loss of land to development would be insignificant in sustainability terms, due to the large percentage of grade 3 land at both a regional and county level, therefore land use constraints are not considered to be a constraint to development.
- 5.7 Appendix 2 tables 3.3 and 3.4 show the ALC percentage coverage at both regional and county level respectively.

*Landscape and Visual*

- 5.8 Despite the sites proximity to Cadbury Heath and the greater Bristol urban area, the area of land either side of Webbs Heath and Siston Lane has a tranquillity and isolation at odds with the scale and proximity of its urban hinterland. This derives from the irregular pattern of dense hedgerows and patches of woodland, along with the presence of the serried escarpment pastures and the dome-shaped form of Webbs Heath north of the London Road. The site presently forms the skyline from views along the A420 and the footpaths traversing the site east to west and north to south along the Siston Brook.
- 5.9 In order to respect the landscape character of the area, development would be arranged in discrete cells of different density developments. The existing hedgerow structures will be retained and the development cells would be encapsulated within these and enhanced pockets of woodland and vegetation. Recreation and ecology corridors would run through the site, linking the existing Warmley Forest Park to the rural hinterland east of the development site.
- 5.10 In conclusion therefore, although the site as existing has an intricate landscape value and is visible from the surrounding area and AONB, sensitively designed development would retain an element of this landscape value and could create a visually pleasing and interesting environment which respects the sites topography, hydrology and vegetation structures.

- 5.11 Further detail is provided within the Landscape Assessment contained within the Environmental Baseline Assessment in Appendix 2.

*Cultural heritage*

- 5.12 An initial review of national data sets, and information obtained from SG Historic Environment Record (HER), have shown that there is no current evidence to suggest that there is the potential for important archaeological remains, to exist within the site. There are however a number of features including listed buildings, scheduled ancient monuments, historic parks and gardens and conservation areas within the wider landscape. The holistic effect of the development on these features will be considered further at a more detailed stage. Due to the absence of archaeological or historic features within or surrounding the site, which would usually merit further investigation, cultural heritage issues are not considered to be a constraint to development.
- 5.13 Appendix 2 figure 2a, and figure 2b give a visual representation of designations in the wider landscape, and at a local level respectively.

*Hydrology – flood risk*

- 5.14 Environment Agency (EA) flood zone data has been obtained, to establish whether the development or certain parts of the development are at risk from flooding. After an initial desk study and site walkover, it has been concluded that the majority of the land within the site, has sufficient gradient to negate any flood potential from the two main watercourses identified, which is verified by EA flood zone maps. Consideration has also been given to the potential for development to exacerbate flooding elsewhere through the discharge of surface water to conventional drainage systems. As recommended by the EA, the integration of Sustainable Urban Drainage Systems (SUDS), where applicable will form an integral part of the development design. Overall flood risk is not considered to be a constraint to development.
- 5.15 Appendix 2 figure 2a, and figure 2b give a visual representation of areas at risk from flooding both in the wider landscape, and at a local level respectively.

*Hydrology - Water resource protection*

- 5.16 EA groundwater source protection zone (SPZ) data has been obtained to determine whether the development would impact on any important groundwater sources within or surrounding the site. There are no SPZs within or surrounding the site, therefore this is not considered to be a constraint to development.

*Ground stability*

- 5.17 The presence of coal mining in the study area was identified during the desk study, therefore the issue of potential ground instability within or surrounding the site has been considered. Bristol Coal Mining Archives were commissioned to produce a mining report for the site and the surrounding area.
- 5.18 The report has shown that extensive mining has taken place to the south west of the site, particularly in areas of Kingswood and Warmley that are now extensively developed, and at Webbs Heath. Although there are mine workings which underlie the south western extremity of the site, the report states that these are almost certainly too deep to now affect ground stability. There is no other documented evidence to suggest that any extensive works underlie the site. The report does highlight that there is the potential for shallower unrecorded workings to exist within the site. Should any issues be identified, there are a number of well established remediation techniques such as consolidation grouting which negate any risk to development. Ground stability is therefore not considered to be a constraint to development.
- 5.19 Appendix 2 figure 2h, gives a visual representation of a number of historic mining features on and surrounding the site.

*Contaminated land*

- 5.20 An initial desk study and site walk over, has not revealed any obvious sources of contamination. The contaminated land register maintained by South Gloucestershire Council, has been checked to ascertain whether there are any recorded entries which would suggest possible contamination issues on site. There is one entry for an area in the southern extremity of the site, where a former clay pit has been in filled; however whether or not the in-fill material is inert is unknown, and therefore there may be the potential for landfill gas/leachate generation. There is also the potential for land surrounding the Webbs Heath Engine House to contain some ash and/or spoil produced by the combustion of coal to fuel the engine house. These are minor issues and are not considered to be a constraint to development. They will be investigated through a detailed geotechnical study, and if necessary remediated using either traditional engineering or process-based techniques.

## **6. Infrastructure considerations**

- 6.1 The nature and scale of the sustainable urban extensions, would necessitate new infrastructure as part of the development to service the site with gas, electricity and telecommunications networks. Existing supply networks are capable of being extended where capacity exists. Additionally capacity may be required and this would be provided as part of the development proposals. The incorporation of renewable energy technologies would be considered to provide for alternative energy sources within the development of a sustainable urban extension.
- 6.2 The only concern for the functioning of the proposed sustainable urban extensions is the issue of water supply and disposal. The site at present benefits from a number of natural waterbodies fed from nearby springs and surface run-off and these can be utilised for SUDS and other technologies such as greywater harvesting could be used in the development to reduce the demand for water supply. The issue of water supply and disposal would need to be considered as a sub-regional matter.
- 6.3 With regard to the consideration of transport infrastructure, the draft RSS has adequately considered key infrastructure requirements in general within the short to medium term phases of the RSS, i.e. up to 2016. However what the RSS has not considered adequately is the likely future infrastructure requirements and likely advances in technology beyond this period, i.e. up to 2026. The RSS needs to be more future-proofed in terms of allowing for a degree of flexibility for evolving transport and infrastructure solutions.

## **7. Transport requirements**

- 7.1 An urban extension in the Area of Search C (North East of Bristol – Warmley/ Webbs Heath) is well placed in relation to existing transport infrastructure and is not dependent upon the delivery of major road building proposals. The east of Bristol is already connected via the A420 to the strategic road network of the East Bristol Ring Road (A4174), which in turn provides links to the M4 motorway to the north. The A420 provides a direct route into the City Centre and Temple Meads railway station. The area of land to the east of Bristol is currently well connected by pedestrian routes and cycleways linking the area to the M4 motorway to the north, Bath to the south and the City Centre to the west.

- 7.2 The Greater Bristol Strategic Transport Study (GBSTS) contains a number of proposals, which would improve public transport connections to the east of Bristol. These are plotted on the Transport Infrastructure Plan at Figure 3 contained within Appendix 3. These are namely:
- Showcase Bus Corridor (No. 7 Avon Ring Road)
  - Improvements to the A4714 Ring Road
  - Quality Bus Corridor along the A420
  - Cycle/pedestrian links along the dismantled railway
  - Rapid Transit System (Emersons Green to Ashton Vale).
- 7.3 There is opportunity to link or provide contributions to link the area of land to the east of Bristol with the Showcase Bus Corridor 7 along the A4174 to provide direct bus linkages into the site. The proposed rapid transit system from Emersons Green to Ashton Vale would further enhance the sustainability and connectivity of the east of Bristol.
- 7.4 The proposed A420 Quality Bus Corridor would considerably improve the connectivity of this area of Bristol, and an urban extension to this side of Bristol would provide contributions to deliver this scheme.
- 7.5 With regard to transport infrastructure provision and the subsequent delivery of urban extension sites, those areas which are currently well placed in terms of existing infrastructure provision and those which are capable of tapping into existing infrastructure with developer funded contributions should be considered more favourable in the short term, in order to ensure timely delivery of the RSS housing requirement. Development of these areas would allow for the integrated provision of the identified key infrastructure requirements and would not involve the isolated delivery of infrastructure and housing.
- 7.6 The nature of the sustainable urban extensions themselves, will encourage a reduction in the need to travel, by the provision of quality services and community facilities. The contributions available from the delivery of an urban extension to the east of Bristol would both enable the delivery of key transport infrastructure and would support the use of public transport thus minimising congestion.
- 7.7 The proposals are not only deliverable in transport terms but would also be sustainable in the way that they would function.

## **8. Green Belt**

- 8.1 Terence O'Rourke's written submission to Matter 3/5 'Selection of Greenfield Development Areas' provides a more detailed case for the justification of the proposed modifications to the Green Belt to the east of Bristol.
- 8.2 The review of Green Belts around the Bristol SSCT has not been undertaken in a co-ordinated manner. The RSS should provide a more robust and transparent justification for the proposed modifications to the Green Belt and Terence O'Rourke has undertaken an independent Green Belt Assessment which should be used to inform any future strategic review of Green Belt boundaries.

## **9. Sustainability of development**

- 9.1 In order to demonstrate the overall sustainability of an urban extension to the east of Bristol, Terence O'Rourke has undertaken an independent sustainability appraisal, which is contained at Appendix 5 to this statement.

## **10. Conclusions**

- 10.1 This statement begins to illustrate the deliverability and sustainability of an urban extension to the east of Bristol. Environmental baselines studies have been undertaken and a number of constraints and opportunities have been identified. The environmental and landscape parameters of the site have informed the conceptual design of the Masterplan. The concept zoning plan in Figure 6 contained in Appendix 6 illustrates how this site can be delivered in a sustainable manner.
- 10.2 The concept masterplan has evolved from an examination of the pattern of existing development and open space in relation to the topography, hydrology and vegetation structures of the areas. The concept masterplan proposes a number of discrete cells for differing development densities set within the structure of the existing hedgerow network. These hedgerows will be enhanced and will act as recreational routes and ecology corridors linking the site with its wider hinterland.
- 10.3 The higher density areas will be located along the A420, west of Webbs Heath Road, with medium density development to the north. The development cells will become progressively fragmented and less denser towards the eastern part of the site, east of Webbs heath Road.
- 10.4 Access can be gained from a variety of places, direct from the A420, Webbs Heath Road and from the north off Goose Green Road. These access points can also provide connections to the wider public transport network.