South Gloucestershire Local Plan

Public Local Inquiry

Inspector’s Report

November 2004

David Fenton BA(Hons) MSc Dip TP M  RTPI
Dear Mr Jackson

I have the honour to report that between 17 June 2003 and 21 September 2004 I held a Public Inquiry into objections to the Draft South Gloucestershire Local Plan, prepared by the council under Section 36 of the Town and Country Planning Act 1990, as amended by Section 27 and Schedule 4 of the Planning and Compensation Act 1991.

The South Gloucestershire Local Plan was placed on deposit for a period of six weeks ending 10 November 2000. The revised deposit plan was placed on deposit for a period of six weeks ending on 26 July 2002. During these periods representations were received comprising approximately 2941 objections to specific aspects of the plan, its policies, text and maps together with 479 representations of support.

On January 22 2003 the council approved the First Proposed Changes to the plan, nos PC1 to PC105. On 26 February 2003 the council approved a further set of changes, the second Proposed Changes, nos PC106 to PC131. During the course of the inquiry a further set of changes, PC132 to PC190 were put forward, these having been endorsed by the council or agreed with the Executive Member for Planning, Transportation and Strategic Environment. In addition, further minor changes have been put forward by officers, bringing the total number of proposed changes to 231, some following agreement with the objectors, others in response to matters raised with them. I have had regard to all these changes in my consideration of the objections, albeit the weight I have been able to give them has had to reflect the degree to which the public have had an opportunity to comment upon them. A complete set of these can be found in the local plan library.

771 of the original objections have been withdrawn, so that at the start of the inquiry a total 2170 outstanding objections had been accepted by the council and these, together with any responses to the proposed changes, are the subject of my report. Of these, 119 have indicated that they conditionally withdraw on the basis of the changes put forward by the council.

A Pre Inquiry Meeting was held on 3 March 2003 to make the necessary procedural arrangements. The Inquiry sat for 44½ days. Prior to, during and after the Inquiry I carried...
out visits, for the most part unaccompanied, to view those sites the subject of objection. In my work I have been assisted by my colleague, Mr Luck, who has given invaluable help, not least in stepping in when I was indisposed.

Format of my report

I have reported upon objections in the order of the plan itself. This has been based upon the skeleton report prepared by the council, though I have made minor alterations where it makes for more logical and efficient reporting. At the council's request I have already given an early indication of my conclusions on three sites: Northfield, Wallscourt Farm and Northam Hospital. The council has also been sent a part-report covering the issue of affordable housing.

For each item in my report I have listed the policy and/or the paragraphs, or objection site. This is followed by objections and then, under the heading "issue(s)" I set out the main issue(s) raised by the objections. I have also listed supporting representations, which have been taken into account in my deliberations. A full list of representations, both supporting and objecting, is deposited in the local plan library. The Programme Officer has also lodged in the library a set of Appendices comprising complete lists of inquiry documents and inquiry appearances.

In my conclusions I have concentrated upon the policies themselves, on occasion suggesting their rewording. There will be places where the council will need to also redraft the wording of the supporting text to reflect the revisions made to the policies. My report is written against the background of Government advice current at the time of writing. Since the draft plan was prepared new advice has been published, including some since the close of the Inquiry. Where relevant, I have taken this into account in making my recommendations and the council will need to have regard to this advice and any subsequently issued advice in considering the contents of my report. I briefly summarise below my main conclusions on the objections made.

My main conclusions

I have supported the strategy of the plan, to concentrate development around the main urban area of Bristol. I have not supported the allocation of land for development around either of the towns, Yate or Thornbury, nor in the villages. Although I have been concerned about the issue of traffic congestion in and around the North Fringe, I am satisfied, on the evidence available, that this area can sustain significant further development without unacceptably worsening traffic conditions in the area. That conclusion is based upon the implementation of a comprehensive package of public transport and highway measures. The council will have to do everything within its power to ensure that a full and comprehensive package is implemented in tandem with the proposed developments. This is clearly an area that the council will need to keep closely under review.

Most significantly, I have come to the conclusion that the plan's housing land requirements should be based upon a longer-term perspective than that offered by the Joint Replacement Structure Plan, which runs only to 2011. RPG10, the Regional Planning Guidance sets the context to 2016 and beyond. It is clear to me that the council will need to develop a longer term approach to identifying housing land supply than has been possible in this plan. Accordingly, I have no doubt that the council will need to tackle this issue at an early stage of its preparation of its LDF under the new Development Plan system. As a result of my consideration of housing land requirements, I have come to the view that this should be set at a level some 10% higher, the net effect being to increase the outstanding, residual housing land requirement from 4,230 to 5,981.

In terms of individual housing allocations, I have supported all the sites put forward by the plan, although I have some misgivings about the extent to which they could be built-out in the plan period. To make up the shortfall, I have also recommended that the land at Harry Stoke...
be developed now, rather than be held as safeguarded land; that the Wallscourt Farm site be extended by a further by 7.9 hectares; that the Emersons Green East site be included as a mainstream allocation, rather than as a reserve site; together with the identification of two other suitable, small sites within the urban areas – at Old Colstonians Playing Fields, Filton and at Coopers Works, Yate.

I have supported the re-allocation of employment land for housing in the North Fringe and, at the same time, have not supported proposals for further major employment development in this area.

Severnside will, no doubt, figure more prominently in future plans. In the meantime, I consider that this plan should adopt a more pro-active role in preparing the ground for a comprehensive approach to longer-term development in this area.

As regards the green belt, I have come to the view that this plan is not the time to make unnecessary changes to its extent or detailed boundary. I have not supported those objectors seeking to remove land from the green belt, with a view to its allocation for housing or other purposes. In my view it is not an appropriate time to make significant changes to the green belt and bearing in mind my conclusions on the Severnside, I have not supported the plan's proposals to extend the green belt in the Severn Beach area. Because of the exceptional circumstances I have supported the inclusion of the "island" land at Hanham within the green belt.

Other matters

I would like to place on record my appreciation of the help given to me by the council advocate and all her witnesses. They adapted very readily to the varying formality and procedures adopted through the Inquiry. I would also like to record, formally, my thanks to my colleague, Robert Luck, who has greatly assisted me in the holding of the inquiry and in the preparation of my report.

A copy of this letter has been sent for information to the Government Office for the South West and to the Office of the Deputy Prime Minister.

Yours sincerely

David Fenton
Inspector
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### Abbreviations used in the report

- **ACSP** - Avon County Structure Plan
- **ARR** - Avon Ring Road
- **ARTS** - Alternative Rapid Transit Strategy
- **Dpha** - Dwellings per hectare
- **EGE** - Emersons Green East
- **GBSTS** - Greater Bristol Strategic Transport Study
- **GOSW** - Government Office for the South West
- **HOV** - High Occupancy Vehicle
- **JRSP** - Joint Replacement Structure Plan September 2002
- **MMI** - Multi Modal Interchange
- **PUA** - Principal Urban Area
- **QBC** - Quality Bus Corridor
- **RALP** - Rural Areas Local Plan1991
- **RPG** - Regional Planning Guidance for the South West September 2001
- **SPG** - Supplementary Planning Guidance
- **SWRDA** - South West Regional Development Agency
- **UCS** - Urban Capacity Study
- **UWE** - University of the West of England
CHAPTER 1 - INTRODUCTION

1. Proposals Map

Objections

287/007 Burford Group Plc
302/010 Charfield Parish Council
302/506 Charfield Parish Council
430/028 Cala Homes (South) Ltd
435/001 Bristol City Council
436/005 Cory Environmental (Gloucestershire) Ltd
436/007 Cory Environmental (Gloucestershire) Ltd

Issues

Should the Proposals Maps show sites with planning permission?

Should the plan be better cross-referenced to the Minerals and Waste local plan?

Reasoning and conclusions

1.1 The Proposals Map identifies a Major Area with planning permission in the Severnside area. It is not normal practice for Proposals Maps to show such areas. They are likely to be out of date very quickly as development progresses over time. In the case of the Severnside area I consider that it is entirely appropriate for the plan to indicate the area subject of planning permission. Here, the planning permission is of considerable relevance and importance to the establishment of a strategy for the area and on this basis I have recommended that it be shown by way of a Figure, within the text of the plan.

1.2 As far as the Minerals and Waste local plan is concerned, the local plan, on the Proposals Map, refers the reader to Appendix 17. This sets out policy 1 of the Minerals and Waste local plan, relating to the Mineral Resource Areas. It is not for this plan to otherwise repeat matters contained within other plans. I am content that this provides an adequate cross-reference to the Minerals and Waste plan.

1.3 The council intends to update the base maps used for the Proposals Map when the final version is prepared. This will also mention Winterbourne/Coalpit Heath/Frampton Cotterell on the title of map 8. I am entirely content with the way that the symbol "H2" is depicted on the inset maps. It is quite obvious, when read with the policy, that this relates generally to the land within the settlement boundary and does not have hidden implications for the exact piece of land on which the symbol is sited.

Recommendation

1.4 I recommend that the local plan be modified by the updating of the OS base, where this is feasible, when the final version of the plan is produced.

2. Chapter 1 - General

Objections

29/001 Mr G Lanfear General 1
29/002 Mr G Lanfear General 1
29/003 Mr G Lanfear General 1
29/015 Mr G Lanfear General 1
29/016 Mr G Lanfear General 1
29/506 Mr G Lanfear General 1
92/001 Banner Homes Ltd General 1
Has the council followed national guidance in the way it has proceeded with the plan?

Is the plan premature?

Does the plan conflict with Article 14 of the Human Rights Act?

Should the plan refer to Supplementary Planning Guidance (SPG) that hasn't been subject to consultation?

Does the plan adequately address the issue of climate change?

Does the plan adequately deal with waste issues and ensure that new development is not affected by waste activities?

Are the policies expressed correctly?

Reasoning and conclusions

2.1 The council has prepared this plan in accordance with the 1990 Act and the 1999 Regulations. It took considerable care to publicise the preparation of the local plan and to consult on its contents. I find no evidence at all to support Mr Lanfear's view that insufficient consultation has taken place on the plan and its contents. The plan's contents are bound to change with the passage of time and I find no reason to think that the council, in making changes during the plan making process, has in any way failed to provide adequate opportunity for the public to comment. Nor do I accept that the plan is premature because it was in preparation before the issue of the housing supply was resolved. To place the plan on hold to await the outcome of the Secretary of State's Direction would have been totally unacceptable. It would have resulted in quite unacceptable delays. As it is, the process has been able to have regard to the final position on the JRSP housing supply requirements.

2.2 Mr Lanfear considers that the local plan discriminates against him, contrary to Article 14 of the Human Rights Act, because it does not allow him to develop a piece of land he owns on the edge of Thornbury. I consider the particular merits of that site for housing in chapter 8A of my report. Suffice it to say here, I find absolutely no reason to consider that the policies unfairly discriminate against him. His land is defined as being outside a settlement. I support that designation. His land is therefore quite reasonably subject to the normal policies aimed at protecting the countryside from unnecessary development. The operation of the planning system does not conflict with the Human Rights Act. The council has not acted unfairly in preparing this plan and then making decisions based upon the policies contained therein.

2.3 SPG does not have the same status as the statutory local plan. It is prepared to assist the development process and should be consistent with the local plan. As paragraph 3.15 of PPG12 indicates it does not form part of the local plan. The weight that can be given to SPG will depend upon the extent of public consultation that has been undertaken in its preparation.
SPG can be a very helpful way of providing more detailed guidance on plan policies and proposals. I find no basis to delete references to SPG from the plan.

2.4 The overall aim of the plan is to be consistent with the principles of sustainable development. The Transport chapter has regard to issues of greenhouse gas emissions, air quality and reducing reliance on the car. Policies EP5 and D1 also address renewable energy and energy efficiency. I consider that bearing these in mind the plan does adequately and properly address concerns of climate change.

2.5 Cross-references are included in the plan to the Minerals and Waste local plan. Policy EP1 seeks to ensure that development will not be permitted where users would be unacceptably affected by existing uses. Taken with policies within the Mineral and Waste local plan I am satisfied that the issue of conflict between waste sites and other developments is adequately covered.

2.6 The policies refer generally to development or proposals being permitted or not permitted. I have no difficulty with this.

Recommendation

2.7 I recommend that no modification be made to the local plan.

3. Paragraph 1.11 – Status of revised deposit draft plan for development control purposes

Objection

448/018 The House Builders Federation

Concern was raised about the status of the plan with the outstanding Direction from the Secretary of State. This has now been overtaken by events. As a result this paragraph is no longer contentious.

Recommendation

3.1 I recommend that no modification be made to the local plan.
CHAPTER 2 – STRATEGY STATEMENT

1. Chapter 2 - General

Observation

Objection

296/001 SW Regional Development Agency

Support

283/001 Government Office for the South West

Issue

Does the plan adequately reflect the economic importance of this area?

Reasoning and conclusions

1.1 The economic role of the area is considered within chapter 7 and the policies and proposals contained therein. These recognise the strength of the economy and the desire to maintain and encourage a vibrant economy. Also to be taken into account must be JRSP guidance which calls for restraint in the North Fringe of Bristol. Employment growth cannot be seen in isolation from housing and investment in the physical and social infrastructure that is needed to sustain it. Environmental impact, including concerns about the public transport systems to enable the area to flourish, will mean that unfettered economic growth is likely to be unrealistic and counter-productive. I comment further on these issues later in my report.

Recommendation

1.2 I recommend that no modification be made to the local plan.

2. Paragraphs 2.2 to 2.13 - Sustainability

Objections

265/501 Persimmon Strategic Land (Western)
426/503 CSJ Planning Consultants Ltd
431/002 Friends of the Earth
441/001 Redrow Homes (South West) Ltd
441/002 Redrow Homes (South West) Ltd
448/017 The House Builders Federation

Support

220/003 The Countryside Agency
220/006 The Countryside Agency
220/005 The Countryside Agency
267/026 Arlington Property Developments Ltd
403/030 Hartwell Plc
416/003 English Nature
431/003 Friends of the Earth
433/001 Save Our Undeveloped Land
433/002 Save Our Undeveloped Land

Issues

How should sustainable development be defined?

Should paragraph 2.6 refer to reducing existing deficiencies and should the reference to appropriate contributions be qualified?
Should this section recognise that there are locations other than on the edge of Bristol where development can be focussed?

Should reference to vacant and underused land be retained in Paragraph 2.8?

Reasoning and conclusions
2.1 The plan defines sustainable development in the most commonly accepted form. This reflects national guidance. Whilst the FoE have a different view on what constitutes sustainable forms of development, this plan properly follows national guidance.

2.2 I am content with the wording of paragraph 2.6. The reference to new development helping to reduce and overcome existing deficiencies is a reasonable approach for the council to adopt. I would expect the council to influence the nature, form and location of development so as to help reduce some of the problems in the area. That does not mean that developers will be specifically required to make contributions directed to that end. The wording of the paragraph goes on to refer to appropriate contributions ....which will be needed by the development in question. What is appropriate will be judged against Circular 1/97, the thrust of which I see no need to repeat in the plan.

2.3 The question of the sequential approach to the accommodation of new development, where development should be focussed, is considered under locational strategy, later in this chapter.

2.4 Bearing in mind my conclusions on policy H2, where I support the principle of development within settlement boundaries on both previously developed sites and on greenfield land, I agree that the wording "and other vacant or underused land" should be reinstated in the plan.

Recommendation

2.5 I recommend that the local plan be modified by the inclusion of the words "and other vacant or underused land" after ".....land previously committed for development" in the first sentence of paragraph 2.8.

3. Paragraph 2.14 - Aims

Objections

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A number of the objections relate to the question of whether the plan's policies and proposals achieve the aims set out, rather than to the aims per se. These objections are considered elsewhere, under the relevant policy/proposal.

**Issues**

Is aim 3 clear and does it properly reflect the plan strategy? Should it refer to meeting the demand for new homes?

Should aim 4 refer to the quality of life? Should it refer to increasing the range of employment?

Should the aims include a national and regional perspective?

**Reasoning and conclusions**

3.1 Aim 3 has been reworded to refer to the dwelling needs of all residents, including those in need of affordable housing. This is all-embracing and reasonably reflects one of the principal aims of the plan. It is properly needs-based rather than demand-based. I see no advantage of it including a reference to where this need will be met. The chapter goes on to consider locational strategy.

3.2 Aim 4 includes a reference to the quality of life. It is not a blanket policy of job creation at any cost. It reflects national, regional and strategic guidance. I see no reason to add a reference to the range of employment. This is subsumed within the wider, general expression of the aim.

3.3 Finally, I see no benefit in a reference to national or regional perspective in the aims. That perspective forms the context of the plan's approach and is considered in the relevant sections of the plan.

**Recommendation**

3.4 I recommend that no modification be made to the local plan.

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4. **Locational Strategy - General**

**Objections**

| 265/001 | Persimmon Homes | 2.15-2.31 |
| 283/003 | Government Office for the South West | General 2 |
| 390/001 | Mr J F B Gunnery | 2.1-2.31 |
| 396/006 | Filton Golf Club | 2.1-2.31 |
| 429/003 | David Wilson Estates | General 2 |
| 430/005 | Cala Homes (South) Ltd | 2.15-2.31 |
| 430/007 | Cala Homes (South) Ltd | 2.15-2.31 |

**Support**

| 180/001 | Joint Parishes Consultative Committee | General 2 |
| 181/001 | Yate Sodbury Liberal Democrats | General 2 |
The objections listed under this heading are considered in the relevant sections below.

5. Paragraphs 2.15 – 2.17A - Locational Strategy

Objections

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Support

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The matters covered in this item relate to the strategy in general terms. Area specific objections are considered in the items that follow this one.

Issues

Does the plan's locational strategy reflect regional and strategic guidance?

Is it clear in its terminology and meaning?

Does the plan's sequential approach to the suitability of locations for new development follow national guidance?

Is the strategy founded on a sound transportation infrastructure?

Reasoning and conclusions

Locational strategy

5.1 RPG10 promotes the most sustainable pattern of development. In policy SS2 it identifies the Principal Urban Areas (PUAs), which include Bristol, as offering the best opportunity for
accommodating the majority of development. Its aim is to concentrate most development at the PUAs. Development should take place primarily within the PUAs. Where this is not possible development should be in the form of planned urban extensions to the PUA. Outside the PUAs the RPG defines a category of "Other Designated Centres of Growth". As these are envisaged as being beyond the direct influence of the PUA they are not relevant to South Gloucestershire. Outside the PUAs, towns should be designated to act as local service centres, though policies should resist the continuing substantial planned expansion of residential development of small dormitory towns within easy commuting distance of the PUAs. Yate and Thornbury would fall within that category.

5.2 In policy SS3, the RPG goes on to define a number of objectives for the Northern Sub-Region. These include building on the economic strengths of the area and seeking a more sustainable pattern of development by strengthening the roles of the PUAs, curbing unsustainable outward expansion and aiming for greater self-containment in towns within commuting distance of the PUAs. Policy SS8 sets out more detailed guidance for the Bristol area.

5.3 The JRSP, whose policies pre-date the RPG, sets out its locational strategy at policy 2. This provides for the concentration of development within and immediately adjacent to the main urban area of Bristol; the development and improvement of the public transport systems; the securing of a more balanced pattern of housing by restraining the expansion of employment uses in the North Fringe. Policy 12 gives more detailed consideration to the North Fringe. Avonmouth/Severnside and Emersons Green are identified as key strategic locations, covered by detailed policies 13 and 14. Policy 8 allows for some development at Yate once appropriate public transport and community facilities are in place or firmly committed.

5.4 Although there are some differences in approach between the JRSP and the RPG I do not consider that these are significant. The broad thrust of guidance is similar. Subject to my comments regarding the clarity of terms used, I am satisfied that paragraph 2.17 gives a reasonable, albeit brief, description of the main elements of the plan's locational strategy. This is then developed in paragraphs 2.18 to 2.31. In those latter sections I comment more directly on particular concerns raised by objectors. I see no advantage in paragraph 2.17 repeating in more detail the content of policy 2 of the JRSP. Nor do I think it necessary for the locational strategy at this point to cross-reference to the earlier sustainability section and the sequential approach to development contained therein. The plan is to be read as a whole. I comment on the phasing of sites to give priority to previously developed land in the housing chapter. Given my conclusions there, it would not be appropriate to add anything to the summary of the locational strategy in this respect.

5.5 The locational strategy in paragraph 2.17 is silent on the rural areas. I note the objection made that it should make some reference in this list of key elements to the economic and social vitality of such areas, as per policy 2(h) of the JRSP. However, paragraph 2.17 is intended only as a summary of the key elements. These are, understandably, aimed at the main areas of change, the urban areas. The rural areas are commented upon later in the strategy chapter.

Clarity

5.6 One of the RPG's visions is to concentrate growth at the Principal Urban Areas (PUAs). Aside of identifying Bristol as one of the PUAs it does not otherwise define the extent of it. Nor does the JRSP. Policy 2 of the JRSP refers to the main urban areas of Bristol and elsewhere. The local plan, in paragraph 2.7 talks of giving priority to the development of land within and immediately adjacent to the urban areas of the district. (The plural being added at revised deposit stage). Paragraph 2.17a refers to the main urban areas, in the plural, though there is no definition of what is meant by that term. Paragraphs 2.9 and 2.10 refer to the urban area in the singular and paragraph 2.28 refers to priority to the urban fringe of Bristol. There is
clearly some potential for confusion and misunderstanding if these terms are not carefully defined and explained.

5.7 Firstly, it would be helpful if the plan gave some consideration as to its understanding of the RPG term "PUA". This would help to clarify the context for the plan strategy and selection of sites. It would appear to equate in general terms to the area contained within the motorway box, together with the built up area of the East Fringe. The motorway box includes land within the green belt, which is to be reviewed at a future date. It may be more appropriate to consider the PUA as extending to the inner boundary of the green belt, although Emersons Green East might more appropriately be considered as being a proposed extension to the PUA, rather than part of it. Whatever the precise detail, it would be an advantage for the plan to give its interpretation of what it considers is meant by the PUA. Although Severnside is an important location for growth, I do not consider that it would naturally fall to be considered as part of the PUA. In any event it is considered as a strategic case in its own right.

5.8 Secondly, JRSP at policy 2(a) refers to the urban areas, in the plural, but in terms of a list which includes Bristol. I read this as referring to Bristol in the singular and not to "the urban areas" of each urban area listed. Thus, policy 2 should be read as giving priority to the urban area of Bristol.

5.9 The local plan, at paragraph 2.7 and 2.17a refers to land within and immediately adjacent to the urban areas, in the plural. There appears to be no explicit definition of urban areas in the revised deposit local plan, though this appears to refer to the Bristol urban area and to Thornbury and Yate/Chipping Sodbury, (as confirmed by PC53, relating to car parking standards), the urban capacity study covering these three areas. The plan has not chosen to allocate housing or employment sites at these latter two towns, apart from a small extension at Stover Road, Yate. On this basis it would be more appropriate for the text to refer to the urban area, in the singular, to refer to the Bristol conurbation. In my view there are sound planning reasons to distinguish the Bristol urban area from that of the two main towns. That both reflects the plan's intentions and, I believe, properly reflects national, regional and strategic guidance. I recommend that the PUA be defined in the plan. The terms "main urban area", "urban area" and "urban areas" should also be defined. References to priority for development can then distinguish between the priority given to the main urban area of Bristol and the other two urban areas.

**Sequential approach**

5.10 The section of locational strategy needs to be read alongside the earlier paragraphs in the chapter on sustainability, particularly those in relation to the sequential approach to development land. The sequential approach is very much to be seen in the context of the locational strategies laid down by the regional and structure plans. For avoidance of repetition I comment here on the plan's sequential approach to the identification of suitable sites for development. I agree with those objectors who consider that the council's sequential approach is not consistent with that contained in national guidance in PPG3.

5.11 The search sequence for housing sites, in paragraph 30 of PPG3, starts with the re-use of previously developed land and buildings within urban areas identified by the urban housing capacity study, then urban extensions and finally, around nodes in good public transport corridors. The search should not go further than required to provide sufficient capacity to meet the housing requirement. PPG3 then goes on to indicate that sites should be tested against a number of criteria, these being aimed at achieving a sustainable form of development.

5.12 The plan properly identifies the importance of previously developed land. However, its expression of the sequential approach is not as clear or explicit as it should be and differs from
the national guidance in some respects. The plan's first priority is identified as involving two categories of land: land within the urban areas and land immediately adjacent to the urban areas. Within this category particular preference is to be given to previously developed sites. The plan then indicates that previously developed land will not meet all the development needs of the district and therefore land previously committed within or adjacent to the urban area has also been considered. Finally, paragraph 2.10 concludes that development needs could all be met from "these priority sources". Therefore there is no need to look to development in expansions of settlements outside the main urban area.

5.13 I find the description of the approach confusing. Firstly, all priority areas are grouped together as one item, rather than separated out. Secondly it is not clear as to the status of undeveloped land within the urban areas. Thirdly, undue emphasis is given to land that was previously committed for development.

5.14 It would help to clarify the position, and in line with national guidance, if the sequential approach to site identification was set out under a series of bullet points. The first of these should be previously developed land and buildings within the main urban areas. The extent of such land within the other, much smaller settlements is limited, but as they are considered in the plan as suitable locations for further development this first priority could reflect the hierarchy of the Bristol conurbation, the two large towns, Yate and Thornbury and finally all the other defined settlements. Secondly, I consider that the next priority should be other land within these areas, again subject to the same hierarchy. I have commented upon this more fully under policy H2. Briefly, the defined settlements are the most sustainable locations in the district. It is inevitable that green field land will have to be used for development. Other policies can protect those areas of open land within settlements that should be left undeveloped for particular reasons. Although the PPG3 sequential approach is silent on this category of site, it seems to me to be entirely logical to develop suitable greenfield sites within the main urban areas before extending those urban areas out into the surrounding countryside. This would reflect the guidance in VIS2 of the RPG and in Tapping the Potential.

5.15 I accept that some of the smaller settlements will be less sustainable, in terms of the tests in paragraph 31 of PPG3, than the main urban areas. Nevertheless, these settlements are all within reasonable reach of a good range of facilities. There are no areas that remote from the Bristol conurbation. Also, there are in practice very few opportunities for development of any scale within the smaller towns and villages of the district. In terms of the broad definition of the sequential approach I see no need to be explicit and exclude any settlements from inclusion within the broad priority.

5.16 In looking at individual sites within this broad framework, the allocation sequence, the tests of paragraph 31 of PPG3 can be applied to the allocation sequence. That, in theory, may find that sites lower down the sequential search may be more suitable than ones higher up. In practice, I have found that it is unnecessary to go beyond the main urban areas to find sites suitable for allocation to meet strategic requirements. I have not found the case for sites lower down the broad sequential approach being more sustainable than sites higher up.

5.17 The next category should be urban extensions to the PUA of Bristol, in particular those areas being promoted as strategic locations for development by the JRSP. This should not involve changes to the green belt boundaries. Finally, following these, would come other locations with existing (or the potential to have) good public transport access along the defined public transport corridors to jobs and services. This sequence would broadly reflect that contained within policy 2(d) of the JRSP. I see no logic or support in strategic guidance for a second tier sequential approach to be separately or additionally applied to market towns. Whilst plans call for the meeting of local needs, including those of market towns and the rural areas, this needs to be seen in the context of the overall approach to housing provision across the district.
5.18 The plan should not give priority to land that was previously committed, through past planning permissions or allocations in previous local plans. These historic commitments may have been chosen for particular reasons or at a time when less weight was given to achieving a sustainable pattern of development. The fact that the land was previously committed should have little or no relevance to the question of whether in today’s circumstances they represent the best and most sustainable location for development. Whilst national guidance calls for the review of employment allocations, for example, this does not mean that priority should be given to these sites for other uses merely because they have been previously identified for development. The thrust of the advice in paragraphs 37 to 42 of PPG3, and of paragraph (c) of policy 2 of the JRSP, is that the process of site identification should be looked at afresh so as to determine which are the most suitable in sustainability terms in the light of the current circumstances.

5.19 Two things follow from this: The plan needs to be explicit as to what it means by the terms used, such as "the main urban area" or "the main urban areas". The other is to agree with the council that it is only necessary to follow the sequential approach as far as is necessary to provide sufficient land for foreseeable needs. This will depend upon the requirements laid down by the JRSP. I comment further on this in relation to the other towns and rural areas of the district below. My conclusions on the sequential approach do not, in practice, lead me to make very substantial changes to the sites selected by the council. The guidance in PPG3 on the sequential approach needs to be interpreted in the context of the locational objectives of both the RPG and the JRSP. In practice, I support the sites selected by the council, but have sought to add to them to reflect my conclusions on the housing land requirements to 2011.

**Transportation infrastructure**

5.20 Paragraph 2.17A, repeated at paragraph 8.30A, indicates that the strategy is founded on the expectation that the Light Rail Transit System, the subject of policy T3, will be implemented and Line 1 operational by 2006/7. It goes on to say that, if this programme is not achieved, a significant worsening of traffic congestion in the North Fringe will result. In these circumstances the council will re-examine proposals for new development in the plan and seek to defer the release of development schemes which would add to the social and economic costs of congestion. PCs 1, 2 and 131 are put forward by the council to update the timescale. They also temper the approach by indicating that if the LRT is delayed then the council will consider, in the light of any revised or alternative public transport strategy whether it would be prudent to defer the release of schemes.

5.21 This paragraph, introduced at revised deposit stage, and amended by subsequent changes, sets up the plan's strategy as a hostage to fortune. It directly links the delivering of the plan's strategy to meet the identified development requirements to the LRT system, which if delayed would result in new development being delayed. That is an entirely inappropriate way to plan for the area's needs. It threatens the very basis of the plan's strategy. It is quite unacceptable to raise such fundamental uncertainties in this way. This would appear to seriously threaten the ability of the plan to deliver the needed development. No explanation is set down as to what sort of alternative public transport strategy might take the place of the LRT and no indication is given either of how and when the council would take any decision to defer the release of schemes.

5.22 As it happens, events have moved on since then. It now appears that there is no real prospect of a light rapid transit system based on trams with a dedicated path as originally envisaged by both Bristol City and South Gloucestershire. Work is progressing on an alternative rapid transit strategy for the district (ARTS). The Greater Bristol Strategic Transport Study (GBSTS) will consider the potential for rapid transit for the Greater Bristol area. The evidence available at this time is that the likelihood of a fixed rail/track system is
very limited and that a bus-based system offers the best prospect of achieving prioritised rapid movement of people along specific routes in the district.

5.23 The council suggests that all references to rapid transit be updated at the modifications stage. Elsewhere, I have supported the retention of safeguarded routes to facilitate some form of rapid transport services though at this time there is no firm evidence as to what form this might take. I have no doubt that the revised deposit wording, as proposed to be changed, is entirely inappropriate and I fully support its deletion. As well as creating a high degree of uncertainty and being overtaken by events, I am also of the view that the very basis of its assertion about the strategy being founded on the expectation of the LRT, is questionable.

5.24 The plan's strategy has been developed over time. This linkage to the LRT has only been explicitly introduced at the stage of the revised deposit plan. The major development at Northfield, and at the other BAe site, do not seem to me to rely on the LRT, but, rather, are much more dependent upon bus services. Emersons Green East is remote from the LRT, as is Hortham Hospital. Those sites close by the safeguarded line have the potential to be served by heavy rail, and/or improved bus services.

5.25 Whatever the historical position, it is clear that the plan must proceed without any direct dependency linkage on an LRT system. The council has reviewed the plan's allocations and is now satisfied that the traffic implications of each development can be satisfactorily addressed. I have received a great deal of information from the council on this matter. I comment more fully on this in the following item. In brief, it seems to me that there is the potential for substantial improvements to public transport within the required timescale to accommodate the development needed to ameliorate their effects upon the highway network and provide a realistic alternative to the use of the car. This strategy would be based upon a comprehensive package of measures, partly public funded, partly developer funded.

5.26 This needs to be reflected in the plan's strategy, replacing the existing paragraph 2.17A. Development must be placed in an overarching strategy of bus-based public transport. Details of this will emerge from the ARTS study. Improvements to the public transport system need to come forward in partnership with the new developments, phased to ensure that these improvements do not lag behind the built development. On major housing sites public transport will need to be in place from day one to ensure that patterns of movement can be secured and established from the outset. To this end I suggest a new paragraph to replace paragraph 2.17A.

Recommendation

5.27 I recommend that the local plan be modified by

i) the definition of the terms "PUA", "main urban area", "urban area" and "urban areas",

ii) the redrafting of those paragraphs relating to the sequential approach to site selection to reflect my conclusions above.

iii) the deletion of paragraph 2.17A and its replacement by: "The strategy is based upon substantial improvements to public transport services in and around the main urban area, where most development is to be concentrated. This is likely to be predominantly bus-based, though there is the potential for some improvement to heavy rail passenger services. A comprehensive package of improvements to public transport services will be partly public funded and partly developer funded. Improvements will be brought forward in close conjunction with new development so as to ameliorate the effects upon the highway network and provide a realistic alternative to the use of the car. New development will take place alongside public
transport improvements, with provision of each phased so as to ensure that residents and workers will be able to take advantage of those services from the outset.”

6. Paragraphs 2.18 to 2.23 - Bristol North Fringe

Objections

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Support

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Issues

To what extent is traffic congestion and poor public transport a restraint on further development in the area?

Does the plan recognise the importance of this area for further economic development and to what extent, if any, should the future growth of employment be restrained?

How much residential development should the area be expected to accommodate?

Reasoning and conclusions

6.1 RPG10 highlights the potential of the Bristol area to continue as a major focus of growth and looks to the meeting of future development requirements at sustainable locations within, and as urban extensions to, the PUA. Bristol is a key location for future investment. The RPG refers to the problems of growing traffic congestion in the North Fringe and the high priority to be given to securing improvements to the public transport system. Of particular note in Policy SS8 is the aim of balanced provision of additional housing, employment, social and recreational facilities within the urban area or as planned urban extensions. The JRSP is more specific on the North Fringe. In particular, policy 12 calls for a restructuring of the area, with a greater mix of land uses, including in particular residential uses. Further development for employment will be restrained.

6.2 The development of mixed use sites and the use of employment sites for housing provides the opportunity to create a better balance within the area and should help to improve self-containment locally and in the broader the area. The North Fringe displays a higher level of self-containment than other, free-standing areas. The figures shown in Figure 7.5 of the plan area are 1991 census based. With the further development since then of very substantial areas of employment it is likely that the North Fringe will now display a higher containment than then and is likely to retain its position as the most self-contained area in the broader area.

6.3 By concentrating development, at relatively high densities, within or immediately adjacent to the built-up area the scope for shorter journeys can be increased, providing the potential for journeys to be made on foot or by cycle. Creating a more balanced relationship between homes and jobs should provide the opportunity for people to live closer to their work and so shorten their journeys to work. The existing built-up areas will provide job opportunities and
local services and facilities. New development can both take advantage of these and add to them. New development will be able to take advantage of existing bus and train services and provide the wherewithal to add to the system for the benefit of existing and future residents. If development were located outside the PUA in one of the outlying towns or villages, then journey lengths would be likely to be that much longer than if development were located within or very close to the main concentration of employment, services and facilities. Thus, in principle there is a strong raison d’etre to the concentration of as much development as feasible within or adjacent to the PUA, including the North Fringe.

Transport issues

6.4 I have commented above on what I see as the plan’s suggested reliance upon the LRT system. With that no longer in prospect the question arises as to whether traffic conditions and the paucity of public transport are so serious as to act as a restraint on the scale and type of development in the area. I have no doubt that, otherwise, the North Fringe represents the most sustainable option for development. It lies within the motorway box, is clearly within the PUA and development here is supported by JRSP policies. The concentration of development in the PUA, at the same time improving the balance between employment and residential development, offers the best scope for achieving a sustainable pattern of development.

6.5 It is clearly evident that the road network in and around the Bristol North Fringe suffers from a very high degree of congestion. The northern end of the Avon Ring Road, the M32, stretches of the M4 and M5, the A38, and other roads around Cribbs Causeway and the wider Filon area all struggle to cope with existing levels of traffic. It is also clear that the public transport system to date has not developed at the same pace as the new employment and housing provision and as a result does not currently offer an attractive and robust alternative to the use of the private car. The plan, in its revised draft deposit form, lays great stress on the provision of the Light Rail Transit system which is now very unlikely to happen. At the same time the timescale before any alternative system could be put in place remains uncertain, at the very least.

6.6 The plan proposes to introduce into this area a considerable amount of new development, including the mixed use site at Northfield, the housing sites at BAE at Filton, Wallscourt Farm, Coldharbour Lane, together with Northam Hospital, to the immediate north of the area. The large mixed-use site at Emersons Green East to the east, though outside the North Fringe, will also have an effect on traffic levels in the North Fringe. These allocations, together with ongoing commitments and windfall developments, could potentially significantly worsen congestion.

6.7 In addition, the proposals for other public transport improvements seem to be somewhat limited in scope and ambition and uncertain in achievement – for example the Avon Ring Road scheme cannot now progress as a Major Scheme (albeit it is hoped to progress this through a staged implementation, funded through a different process) and the Quality Bus Corridors are still in the early days of planning, with the first one, the A38, some way from completion. The council has responded to these concerns by setting out in some detail the comprehensive package of measures that it envisages being developed to address existing and future transport in the North Fringe in addition to the policies designed to promote more sustainable travel choices and reduce reliance upon the car.

6.8 The measures proposed are centred on substantially upgrading bus services along the A38 and providing good orbital services between Northfield and Emersons Green, along the ARR. The evidence from the council suggests that a mix of bus gates, bus assistance measures and linked bus priority schemes would enable buses to flow freely along the ARR, and elsewhere, and to pass through the junctions without serious delay.
6.9 The council has also provided extracts from the output of its North Fringe SATURN traffic model. These show projected peak hour traffic flows in 2011 on key parts of the network, extended to include the ARR to beyond what I presume is the B4465 junction. The Do Minimum values assume only general traffic growth and the effects of the A38 QBC (Quality Bus Corridor). The Do Something values allow in addition for the implementation of the integrated transport package for the ARR, the full build-out of all sites allocated in the revised deposit draft and the public transport enhancements proposed by the developers of those sites. Neither set of values includes the effect of the LRT. The extracts provided show that, other than moderate increase (Do Something 2011 compared to Do Minimum 2011) in pm peak northbound traffic on the A38 north of Gypsy Patch Lane, there would be little material change in flows along the A38, small changes along parts of the motorway box, but significant changes along the orbital ARR.

6.10 Indeed, the greatest impact of the proposed development would be on the ARR between the Great Stoke Way roundabout and the B4465 junction to Pucklechurch. The highest Do Minimum forecast flow in this whole length occurs westbound in the am peak between Coldharbour Lane and Great Stoke Way, with the next highest being eastbound on the same section in the pm peak. To the extent that link flows give an indication of congestion level, and bearing in mind present-day conditions on this part of the network in the peaks, the significant Do Something increase in the latter flow must give cause for concern, as must the even greater flow in the pm peak on the eastbound carriageway of the ARR immediately east of M32 junction 1.

6.11 However, it is likely that congestion in this area derives principally from the lack of capacity of the junctions rather than of the links. The council has also provided information on junction delays and queue lengths from the SATURN output, together with commentary both in general terms and on some key junctions or particular arms of those junctions. This commentary concludes that the Do Something case will be no worse than, and if anything improve on, the Do Minimum case. All the forecast queue lengths will be contained within the related links and so there will be no interference between junctions. This factor is especially crucial since otherwise, even with a bus lane extending along a full link length, it may not be possible to identify any extra measures which would ensure that buses were not impeded by the congestion of general traffic. That lack of impediment is an important contribution to giving buses the substantial journey time advantage over cars that would enhance their attractiveness.

6.12 This summary of the position is reassuring, but I have some concerns about some individual parts of the network. Of particular importance are the identified but unspecified increases in delays on some parts of the M32/ARR junction complex. These need special consideration, especially since there appears to be disparity between the commentary and the diagrams in relation to the northbound slip roads in the pm peak. It is also not clear that local roads other than the A38 and the ARR will escape worsening problems. I have in mind those for which there is no commentary but where either there is a substantial increase in the figures on the diagrams or directly comparable figures are not provided. Examples are the Patchway area and Hambrook, as well as outside the North Fringe on A432 and Westerleigh Road. The analysis will need to be further developed as more detailed transportation assessments from major sites become available. Attention can then be paid to refining the design of the measures to ensure the provision of quick and reliable public transport.

6.13 Because of some of the bus measures proposed, delays to cars may increase, as the road space available to them decreases. Some congestion is not in itself a bad thing. It cannot totally be planned out. Congestion is a form of capacity restraint, a way of encouraging travellers to leave their cars at home, or at park and ride sites and travel by the freer flowing public services. On the other hand, if serious levels of congestion remain, the area could lose much of its competitive advantage with the area developing a stigma that it
would be difficult to lose. It is important to the economy of the area and the wider region that the North Fringe retains its prosperity and economic drive.

6.14 That said, I am confident that the measures outlined by the council would go a long way to improving the level of public transport in the area and would help to provide a modal shift away from the car. The measures being promoted by the council provide a comprehensive approach. Tied in with the advantages of providing mixed developments which will reduce the number of journeys on the congested parts of the network, improving the balance between jobs and homes and otherwise locating development as close as possible to existing infrastructure, these measures should help to assimilate the development into the area without seriously worsening levels of congestion.

6.15 Site-specific measures, such as local MMIs, will encourage the use of public transport for longer journeys, especially if feeder buses could pick up near their homes those people who live in the further reaches of the larger sites, and drop them off at the MMI so that the car could stay at home. However, the transportation measures associated with each site do not stand alone. They work together as parts of a whole, which includes as well the publicly funded measures to provide an effective way of enabling people to travel between locations, particularly in the peak period between their homes and their workplaces. There is an interdependence between sites here, and care will be required to ensure that the balance between demand for and the supply of transportation measures is maintained, regardless of the source of finance for the supply side.

6.16 What needs to be recorded here, in the strategy section, is that development must not be allowed to race ahead of the transport improvements, otherwise there must be a real concern that further development would simply exacerbate the current congestion problems. My recommendation in the previous item refers to this point. In addition, the plan needs to lay out quite clearly what is expected of each development site in terms of improvements to the highways and to public transport services, both physical and financial, and to ensure that the necessary improvements are in place by the first occupation of the houses or workplaces. In that way people will have the opportunity of establishing their travel practices from the outset. I recommend accordingly.

**Employment issues**

6.17 There is no doubt that the Bristol area, and the North Fringe in turn, are important drivers of the region's economy. The North Fringe has accommodated very significant levels of economic growth in recent years and now provides jobs for over 60,000 people. This importance is recognised in the Aims, Visions and policies of the RPG10. Similarly, the JRSP recognises the economic strengths of the area in which the North Fringe plays a significant role.

6.18 Alongside this recognition of the economic importance of the area, the JRSP in its locational strategy seeks to secure a more balanced pattern of housing and employment across the area by a range of policies including the restraining of the expansion of employment uses in the North Fringe. This would be achieved by diversifying development on existing land commitments, particularly providing for more housing and restricting new employment allocations. Policy 12 spells out more detail, including that provision for new employment should be restricted to sites that are suitable only for employment uses.

6.19 Alongside the balancing of employment with housing in the North Fringe the restraint on employment land in the North Fringe is linked to the objective of regeneration in the South Bristol and Weston-super-Mare areas. I do not underestimate the difficulties in regenerating the economy of these areas. Nevertheless, a start has to be made, otherwise the result would merely be a perpetuation of the recent boom in the North Fringe, with no material progress in
the more disadvantaged areas. In the North Fringe, the plan needs to achieve a very real shift away from replicating past development trends.

6.20 To that end the plan reallocates for housing land previously committed for employment at Wallscourt Farm (8.7 hectares) and allocates two parts of the BAe land previously safeguarded for future employment use, fronting the A38 (9 hectares) and the Northfield site (74 hectares) primarily for housing. In addition residential development has taken place at Stoke Park Hospital and Parkway North on land previously identified with employment uses (24 hectares). The council also proposes housing development on land previously committed for university purposes at Coldharbour Lane (12.6 hectares) and housing on the former Northam Hospital site, (9 hectares) whose uses could have included employment. Such an approach also reflects the guidance in the draft PPG3 Consultation Paper, "Supporting the delivery of new housing”.

6.21 This leaves a position that there is now, on the basis of the council’s Employment Land Availability Survey, 2003, an estimated total of 71.23 hectares of employment land in the North Fringe. This comprises the 14 hectares of employment land allocated within the mixed use site, Northfields, and 47.53 hectares of land within policy E3 safeguarded land. In addition there is 9.7 hectares of land committed at the Combination Ground, for which a resolution has been made to grant planning permission for B8 uses.

6.22 Over the past fourteen years the average rate of employment land take up has been 10.71 hectares, 8.61 hectares for offices and 2.11 hectares for industrial use. This figure has been somewhat distorted by two very large schemes, the MoD and Sun Life developments. Taking those out of the equation, the annual take up rate of employment land in the period 1989 to 2003 has been 6.61 hectares, the office rate reducing to 4.50 hectares per annum. These past rates for all employment land, if carried on over the remaining 8 years of the plan, from 2003 to 2011, equate to a need for 85.68 hectares, or 52.88 hectares discounting the 2 large schemes.

6.23 On the face of it, the identified 71.23 hectares, representing an annual rate of 8.90 hectares a year, appears to provide a supply not that much lower than that provided in the preceding period. However, as the council accepts, little land is immediately available and some sites may not be developed before the end of the plan period. Also pertinent is the availability of sites suitable for office developments. Offices have been by far the main element of the growth in employment in the North Fringe, about 80% of all employment land development has been for offices. I see no reason to think that this picture will not continue. Estimates advanced at the inquiry suggest that about 37 hectares of land would be suitable and available for office development in the plan period. This figure allows for half the Northfield employment allocation being available for offices and for 17.8 hectares of land at Hewlett Packard being also retained for office use.

6.24 I find no reason to quarrel with the land availability position as set out above. It is reasonable to allow for half of the Northfield site to be developed for offices, though there is no strong reason why the whole 14 hectares could not be made available for offices were the need to be shown. I give detailed consideration to the Hewlett Packard site in chapter 8 of my report. I am not convinced of the need to retain the whole of the 17.8 hectares here for employment use. As a result I have supported the allocation of a further 6.9 hectares of the employment land for housing. This would mean an overall supply of land suitable for offices of about 30 hectares. On an annualised rate this equates to 3.75 hectares a year.

6.25 The key question is whether supply of the scale of 64 hectares of employment land, of which about 30 hectares would be suitable for offices, is too much, too little or sufficient for future needs having regard to the national, regional and strategic advice and guidance. The use of past trends is of limited assistance in this. The thrust of the JRSP as regards the North
Fringe is to turn round past trends and use opportunities that arise to provide housing to redress the current imbalance.

6.26 There has been a suggestion that the JRSP imperative was conceived in the context of a large excess of employment land over demand, that the policy of restraint reflected there being, at the time, over 200 hectares of employment land provisionally available in the North Fringe area. The situation in this respect is not entirely clear, though the Consultation Draft of the local plan would have been public then. The council suggests that the Panel knew of steps already in train to reduce the overall amount of potential employment land.

6.27 However, whatever the context of potential land availability then and now, it is clear from reading the JRSP, policies 2 and 12, that the plan seeks to secure a better balance between housing and employment and to restrict provision of new employment sites to those which are suitable only for employment uses. A restructuring of the area is being called for. The imbalance between jobs and homes is the key issue here, a concern that has lead to severe traffic related problems.

6.28 Particularly telling in this respect is the comparison of economically active and jobs in the North Fringe. In 1991 there were 21,000 economically active and 35,000 jobs, an excess of jobs of 14,000. By 2001 the number of jobs had risen to nearly 59,000 whilst the economically active rose by nearly 9,000, giving an excess of jobs of 29,000. The council predicts that in 2011, even on the basis of the plan's reduction in employment land and its housing allocations, jobs would have risen to 72,000, with economically active at 39,000. That means that, even with the measures being taken by the plan, the excess of jobs over the economically active population would have continued to rise, to over 33,000.

6.29 The council has not advanced any model of the desired mix of employment land and housing land that should be aimed for nor any formula of how much new employment land there should be in relation to the scale of residential development proposed. It is, therefore, much more of a subjective process to determine how much employment land should be made available. The guidance does not call for a complete halt. To do so could seriously harm the vitality of the area and its contribution to the economic wellbeing of Bristol and the northern sub-region.

6.30 On paper the provision of about 64 hectares of employment land, of which a little under half is likely to be suitable for offices seems generous. It allows for an annual rate of 8 hectares per annum of employment land, including 3.75 hectares per annum of offices. The amount of non B1 land identified would provide sufficient, at past rates, for many years after the end of the plan period. Much of these sites are committed or are on industrial estates where some room for expansion is desirable in the context of a vibrant local economy.

6.31 The amount of office accommodation does give me more concern. Aside of the absence of any proposals for a Business Park, which I consider in respect of the objection in relation to the Wyck Beck Road site, in chapter 7 of my report, it is important to provide a range and choice of sites. Not all sites allocated are likely to be completely developed by 2011. Some sites are very much linked to the expansion of existing enterprises, being held in effect as reserve sites and may not become available on the open market. Even so, there is still a significant amount of land with office development potential available. Given that there is now less than 7 years to run of the plan period I find little support for the argument that the potential of 30 hectares is too little and could harm the economic prospects of this key area. It allows for office developments to continue, at a slower rate that reflects the JRSP's concerns. It allows for considerable areas of land to be reallocated or identified for housing.

6.32 On the other hand it is not so limited as to reduce the opportunity for some continued growth which reflects the economic importance of the area. With the changes I have
recommended, to reduce the employment land content of the Hewlett Packard site, I believe that the amount of employment development provided for reflects the need for a better balance in land uses, at the same time allowing some economic expansion without causing unacceptable worsening of the traffic conditions in the area. I do not consider that this level of provision would harm the role of the North Fringe as a driver of the economy of Bristol and the wider sub-region. The North Fringe could not possibly be expected to continue to grow at the exceptional rate it has over the past twenty years. That is out of the question. Rather, the level of provision provided for in this plan allows it to consolidate that role, without making conditions worse. Substantial employment opportunities will remain at the nearby Embrons Green East site.

6.33 In conclusion on this issue, I support the reallocation of land from employment use to residential. I am content that the scale and type of employment land available is reasonable and reflects both the economic role of the area and the thrust of the JRSP desire to seek a restructuring of the area. In terms of policy 30 of the JRSP the greater potential benefit to the community outweighs any arguments for the retention of past employment land commitments.

**Residential development**

6.34 The plan provides for a considerable amount of new residential development. My recommendations elsewhere will add to that amount. I see no difficulty in principle with concentrating a very substantial slice of the new housing allocations in this area. This is a sustainable location for new housing that takes advantage of the superior accessibility and range of jobs and services and facilities offered by the area. My only concern is the effect if any of this additional development upon traffic conditions in the area. For the reasons spelt out in the first part of this item, I am content that there is leeway to achieve a large increase in the resident population, which goes some way to redressing the imbalance between homes and jobs.

6.35 In conclusion, I consider that the plan's approach accords with guidance in RPG10 and the JRSP. I am content with the wording of paragraphs 2.18 to 2.23, subject to the changes proposed by the council through PC3.

**Recommendation**

6.36 I recommend that the local plan be modified in accordance with PC3.

I also recommend that in respect of the development sites of 500 dwellings or more, the plan should endeavour to set out clearly, either in the site policy or supporting text, what is expected of each site in terms of improvements to the highways and to public transport services, both physical and financial. Each section should also explain how those improvements will be delivered alongside built development, so as to provide first occupants with the opportunity of taking advantage of those improvements from the outset.

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7. **Paragraph 2.24 - Embrons Green**

**Objections**

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2.24
I consider here the issue of the principle of allocating this site. Those more specific objections to the details of the proposals and their timing are considered in chapter 8 of my report, in the item on proposal M3.

**Issue**

Does Emersons Green East represent a suitable and sustainable location for development of this scale?

**Reasoning and conclusions**

7.1 Uniquely for an individual site in this district, Emersons Green East (EGE) has its own JRSP policy, policy 13. That provides for a major mixed use development comprising a science park, other business and industrial uses to meet local employment needs and residential development. All should be planned on a comprehensive basis, integrating with the wider Emersons Green residential development on the west side of the Ring Road. The local plan promotes the development through policy M3, which provides for a 25 hectare Science Park, 20 hectares of employment land, 1,500 dwellings on 30 hectares and the balance of the developable area, 40 hectares, being safeguarded to meet development needs post 2011. The whole development is identified under policy H1(B) as a reserve site not to be developed before 2006. I comment upon the range of land uses, the safeguarding of land and the timing of the release of the site under policy M3, in the housing chapter.

7.2 EGE forms part of the locational strategy of the JRSP. Policy 2(e) seeks to realise the economic potential of this key strategic location. Policy 13 expands on the various elements that will make up this major mixed use development. What is proposed is, in effect, the completion of a very large development in the Emersons Green area. About 3,000 dwellings are nearing completion to the west of the ARR, with a local centre provided. The green belt boundary was drawn back from this area many years ago. There is, thus, a very strong historical and strategic imperative to the promotion of this site in this plan that weighs heavily in favour of the allocation of this site. Although the JRSP policy 13 predates the RPG, I do not consider that this materially should undermine the force of the JRSP approach to what is the completion of this major area of development.

**A suitable and sustainable site**

7.3 In terms of the sequential approach to the selection of sites, this site is an urban extension. It is part of a much larger and long term proposal, those part of which that have been completed west of the ARR can reasonably be considered as part of the Bristol PUA. However, EGE itself lies to the east of the ARR on land that for the most part is greenfield. It would normally, in accordance with PPG3 and my conclusions earlier in this chapter, be considered as a lower priority behind land within the main urban areas. Development here would be more likely to increase overall travel levels compared with locations within the North Fringe area. However, it has a strategic importance, being expressly featured in the JRSP.

7.4 A number of objectors question its suitability for development on the basis of its peripheral and somewhat isolated location at the eastern fringe of Bristol. Were it not for its identified strategic role and its relationship to the larger development in this area, I would consider this site as an inferior location to those peripheral sites on the northern fringes of the Bristol urban area. This site is somewhat out on a limb. However, it is in a location that can provide a greater range and choice of employment opportunities for residents of the extensive residential areas to the west, with the prospect of reducing the need of those residents to travel further afield for work.

7.5 The evidence points to the site offering less potential than others for using means of transport other than the motor car. However, it is intended that development here be closely
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7.6 As regards its place in a sequential approach compared with the other large allocations, I place Northfield, as a previously developed site, first. The Hewlett Packard and Coldharbour Lane sites have the advantage of being in the North Fringe, within the PUA and closer to the full range of facilities and services found there and in that sense are sequentially preferable to this site. They help to meet the thrust of the guidance in policy 12 of the JRSP, in re-structuring the North Fringe. They help to create a critical mass to provide good, local supporting facilities.

7.7 I note the view that the strategic significance of this site should transcend these considerations. I do not consider that PPG3 should be read to undermine the importance given by the JRSP to this site, particularly bearing in mind that this site, in effect, represents the final stage, completing a much larger development. The JRSP adoption date postdates PPG3 by some two and half years. If there was any inherent conflict between the two, then there was ample time in which to have regard to this. In my view the relative differences of location and in their sustainability between this site and those allocated sites within the North Fringe are not, in any event, so great.

7.8 I do not consider that there is any inherent conflict between this site, that enacts policy 13 of the JRSP and those sites that seek to reflect policies 2 and 12 of that plan. In these circumstances I am content to treat the Emersons Green East site as being only very marginally below those greenfield allocations in the North Fringe, those being second only to previously developed urban sites. In any event, I see this as being a somewhat academic and fruitless debate as I believe this site is needed as well as the plan's allocations, in policy H1(A). For these reasons I support the retention of this section of the strategy dealing with this site.

Recommendation

7.9 I recommend that no modification be made to the local plan.

8. Paragraph 2.25 - Downend/Staple Hill/Kingswood/Hanham

Objection

431/009 Friends of the Earth 2.25

Issue

Should the plan contain a clearer strategy for this area?

Reasoning and conclusions

8.1 This paragraph sets out the strategic approach to the area and by implication acknowledges its particular problems. The nature of this area means that there are few opportunities to influence changes in the area through specific allocations of land. However, policies in the plan, such as E3 and RT1 provide a basis for implementing that strategy. I see
no need to expand this paragraph to spell out in any more detail the goals and methods of tackling the area's problems.

**Recommendation**

8.2 I recommend that no modification be made to the local plan.

9. Paragraphs 2.26 and 2.27 - Severnside

**Objections**

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**Support**

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Severnside is covered by two paragraphs, 2.26 and 2.27 in the strategy chapter and by a longer section of supporting text, paragraphs 7.22 to 7.38 in the economy chapter. A shorter section in the transport chapter sets out details of the major road system identified as being required to serve development needs. Severnside, west of the M49, is listed as a safeguarded area under policy E3, Appendix 11 identifying that area, 328.4 hectares of land, as being available for employment. That area is shown on the Proposals Map as being safeguarded, whilst the area to the east of the M49 is shown as being a major area with planning permission. Appendix 12 reproduces, for information, policy 14 of the JRSP. There are other mentions in other chapters of matters relating to the Severnside area. There is no specific Severnside policy within the plan.

To avoid unnecessary repetition I shall consider all the objections relating to Severnside in this section of my report.

**Issues**

- Should the plan contain a policy to guide development decisions?
- How should the extant planning permissions be reflected in the plan's approach?
- What could and should a policy add to the JRSP policy?
- What scale of development should be permitted in the plan period?
- What should be shown on the Proposals Map?
Reasoning and conclusions

The inclusion of a policy in the plan

9.1 Severnside, along with Avonmouth to the south, is recognised by the JRSP as having the potential to become the region's premier location for manufacturing and distribution activity, and as such will perform a major role in meeting the future economic requirements of the plan area. To that end policy 14 indicates, in positive terms, that provision will be made for the expansion of a broad range of employment uses over a long-term period. The policy states that the scale and nature of provision will be identified and reviewed as development progresses, as part of an integrated, comprehensive approach, reconciling potential conflicting considerations. It goes on to say that provision will be made for various measures including the construction of the M49 junction, a spine road and for a co-ordinated package of public transport measures.

9.2 The context for development here is that the emphasis is upon an integrated, comprehensive approach. A strategy needs to be developed involving all stakeholders. To date this has not been possible, with failed attempts at agreements on how to proceed. The issues are very difficult, involving major and costly infrastructure provision, including a new M49 junction and supporting road system, the existing and future capacity of the nearby and wider highway network, provision of a public transport network, protection of important nature conservation areas and the amenity of local residents and prevention of flooding. Even if new highway works are implemented, these may not fully resolve highway issues and decisions will still be needed as to how to respond to the new capacity levels created by the new highway provision. A new M49 junction and associated works is not a panacea to the highway problems of the area. To my mind it is absolutely essential that a co-ordinated and comprehensive strategy is developed. Without it the potential of this area simply will not be achieved. The constraints to development are considerable and will require all relevant parties pulling together to, amongst other things, tie in land use developments to an agreed transport infrastructure and its funding.

9.3 Paragraphs 2.26 and 2.27 effectively do not take the JRSP major strategic proposal any further. The text indicates that the suggestion of residential development is not needed in terms of meeting housing requirements. The latter paragraph indicates that in terms of the extent of development already committed that the council will safeguard nature conservation interest, protect local amenities and try and reduce the reliance on the car. The text in chapter 7 gives a fuller account of the current position. It then, in effect, puts off any further consideration of the development strategy, this to be prepared at some future date. The text then goes on to set out the council's principal requirements to be elaborated in that future development strategy.

9.4 I find this approach somewhat surprising. Along with Ememsons Green, Avonmouth/Severnside is identified in the JRSP's locational strategy as being a key strategic location, policy 2(c) seeking to realise its economic development potential. For such an important proposal there should be some clear, positive guidance as to how this major scheme is going to be progressed and developed over the plan period and how individual decisions will be made both in the longer term and in the immediate, remaining years of the plan period.

9.5 I do not think that at present the plan gives sufficient guidance as to these matters. In effect the plan relies on the controls contained within policy E2. This policy does not provide a policy specific to the particular circumstances of Severnside. Nor does it reflect the constraints and uncertainties that afflict the planning of this area or provide the necessary controls, or indeed the way the area is to be moved forward. The plan needs to contain a clear approach to how decisions will be made in the plan period and how the council would wish to see things progressed beyond 2011. Without a clear policy the plan fails to fulfil its purpose. This is too important a subject to leave to Supplementary Planning Guidance.
9.6 The Severnside area does not sit easily within the sequential approach. It does not readily appear to be a composite part of the PUA, being separated from much of the main built-up area by green belt. In terms of policy SS2 of the RPG10 it is difficult to say with any assurance that it should be considered a priority area for development. That said, it is a location that clearly has major economic potential. That potential is fully recognised in the JRSP, where it forms an important part of the plan's locational strategy. Given that recognised importance I see no fundamental reason for the plan not to promote the area as a major, long-term area for economic development.

**The extant planning permissions**

9.7 The situation is further complicated by the existence of longstanding, extant planning permissions which have the potential for some continued development here even in the absence of an agreed, comprehensive strategy. I can understand the council's position that there is very little practically that a policy could add to the detailed policy 14 of the JRSP. No agreement is in the offing, development is likely to be very much long-term and in the meantime some development may come forward under the umbrella of the extant permissions. There is a strong element of realism in that position. However, in my view, this unacceptably understates the importance of this area and the need to provide a clear local guide as to what is to happen in the remaining period of this plan.

9.8 It now appears that a very large part of the Severnside area is covered by the extant permissions which, in theory at least, allow for very substantial levels of employment development to take place. Whilst the plan is right to acknowledge this situation I do not consider that it makes for good planning to lay too great a stress on this. The permissions date back almost 50 years. They allow for a scale of development that fails, now, to reflect the circumstances of the modern era. Their implementation could cause very serious harm in respect of a range of matters, including the achievement of a sustainable form of development, adequate highway and public transport provision and residential amenity. In this context, it is noted that a new M49 junction would not be able to cope with the level of development that theoretically could be developed in the area. It should be the role of the development plan to look forward rather than back. It should try and control and guide development.

9.9 It is also noteworthy that the largest recent development, WAP, proceeded by way of a separate planning application. Implementation of the extant permissions, whilst physically and legally possible, would not appear to provide for attractive, well-accessed and marketable accommodation. It seems to me from the evidence that market conditions are not buoyant in the area and that the clarification of the planning permissions does not materially alter that position. The obstacles to incremental, piecemeal development under the 1957/1958 permissions may be very significant. In my opinion, the plan should not give any serious credence to the past permissions, beyond acknowledging their existence and that development could come forward under their auspices.

9.10 Thus, it does not seem to me that there is a reasonable likelihood of significant levels of development proceeding under the terms of the 1957 and 1958 permissions. To take a passive stance leaves the impetus with an approach of piecemeal, incremental development based on a very old and unsuitable planning regime. Rather, the plan should emphasise the best sustainable framework within which it would now like development to proceed. It should promote a comprehensive strategy, one that would make even less likely the chances of an incremental, piecemeal form of development based on the 1957 and 1958 permissions.

**A local plan policy**

9.11 Development in the Severnside area has always been seen as being long term in nature. There are very substantial constraints to achieving development that reflects the regional
importance of the location, not least the high infrastructure costs. To resolve the outstanding problems and produce a coherent, integrated package of proposals and policies will not happen overnight as experience over the past few years indicates. It may well be that the Regional Development Agency will have to take a very positive and active lead here. I would add that in my view that appears absolutely essential if progress is to be made – but that is a matter for others. In any event, most development will not happen until well after the end of this plan period. The plan should clearly set out what is expected in the meanwhile. In this context there are strong reasons, until such time as there is an agreed strategy in place, to concentrate development on previously developed sites and those that are committed, where there is a realistic chance of development proceeding.

9.12 There are a number of areas that a policy could cover. Firstly, it should set out an overview of the plan's strategy for the area. Secondly, it should set out the scale and location where development could come forward during the plan period, together with the criteria against which any scheme coming forward for planning permission would be judged in the absence of a clear, integrated and comprehensive strategy. Thirdly, it can give some indication, and impetus, as to how the broader issue of developing a strategy is to be advanced.

a) A strategic overview

9.13 On the question of the plan's strategy, I accept that there is a danger of the policy merely repeating what is within the JRSP. However, because of its importance, because this would usefully set the scene for the rest of the policy and because I believe there is room for a local slant on the strategy I come to the view that it would be helpful to set the basic strategy out here in policy form.

9.14 My suggested wording for this part of the policy brings together the main elements of the strategy. The range of employment uses should be based upon the potential identified for B2 and B8 employment. Whilst this does not exclude the possibility of B1 uses, those uses should not predominate, unless at some future date a strategy gives them a greater role than now envisaged. Non-employment uses, including residential, may be appropriate, though this will very much depend upon the way in which any comprehensive strategy develops in the future. I do not consider that the local plan can speculate or be more specific on this point at this time. Housing is not needed here in order to meet the JRSP requirement to 2011.

9.15 The suggested policy sets out those highway proposals that are currently thought to be needed if the development of the area is to proceed. Public transport is very limited in the area and it is undisputed that significant, substantial improvements in this regard are needed. Finally, the strategy refers to environmental issues of the area's ecology and landscape and the threat of flooding.

b) policies to run to 2011

9.16 Based on the above considerations I believe that a policy should aim to specifically limit new planning permissions to redevelopment of existing employment sites and new development on the remaining WAP 1 area not yet developed. I understand that this would allow a rate of development on that WAP 1 land, which would be greater than the rate of development achieved over recent years in the area. That land provides more than sufficient new employment potential to meet current levels of need. Development that does come forward would then be subject to the normal development control criteria set out in the plan.

9.17 There is no need for more land than that provided for by WAP 1. This approach does not preclude development coming forward under the old planning permission, but would do nothing to encourage it. Rather, it would help to focus attention on that part of the area where there is a recent planning permission that is being implemented. Bearing in mind that
permission has been granted for the WAP 1 development, that it is a commitment, it would be more appropriate to include that part of it that is currently undeveloped under Appendix 11 as being available for employment development. The entry at point 10 of policy E3 will need to be amended to reflect this.

9.18 There is a potential in the area for development at a level well beyond the capacity of the network even with the implementation of the road schemes listed in the recommended policy. The existing road system imposes its own restrictive limits to development. It is suggested to me that WAP2 could be developed for B8 uses under the 1957 planning consent without significant impact upon the local highway network and without the need for a new junction on the M49 motorway. Whatever may be the position in this respect, it seems to me that a more global, less piecemeal approach needs to be taken. Bearing in mind the capacity for some incremental growth in the WAP 1 area, it seems reasonable to me to discourage further significant economic development until the wider strategy issues have been resolved.

9.19 The policy needs to reflect the importance of the area and at the same time the essential need for a comprehensive approach which tackles the provision of the requisite infrastructure. This should include the extent and nature of the need for major highway provision before development, beyond existing, recent commitments, can take place. Given the essential nature of the highway infrastructure and other pre-requisites of development it is not unreasonable to limit the areas of development to those protected by policy E3 until such time as the strategy has been developed and is in place.

9.20 This approach reflects the wording of policy 14 of the JRSP in that the scale and nature of development will be identified and reviewed as development progresses. Policy 14 does allow for development to proceed in advance of a strategy and that is recognised in the policy wording I advance. However, the highway constraints and the capacity to cope with potential development levels are such important considerations that I consider that it is essential that development, as far as practical, is constrained beyond this scale until a comprehensive approach is agreed with all the appropriate parties. That reflects the position of the Highway Agency. That is what the policy I recommend is attempting to do. I note the view that the trip generation rate assumed by the Highways Agency for WAP 1 is over three times the rate that has actually occurred to date. That may well be the case, but future development of that area and any other that may be progressed under the old permissions may not necessarily follow the same type and form.

c) Developing a strategy

9.21 Finally, and rather unusually, I consider that the policy should contain an aspirational, administrative element, that sets out the council's intention to contribute positively to the preparation of an agreed strategy for the whole of the Avonmouth/Severnside area. I consider that this is so important that it warrants going beyond the normal scope of planning policies to indicate the commitment of the council to doing what it can to make progress in this area. At present the plan is effectively silent on this critical need for a strategy for the area. Bristol City Council will clearly, also, have an important role in drawing up this strategy for the whole area.

9.22 I see this policy as being very much an interim one pending a chance to get a comprehensive strategy off the ground. There are too many uncertainties at present to plan conclusively for the long term. The questions of funding and the thresholds for the scale of development set by the existing and potentially improved main road network are matters that will need considerable debate, as will the location of development if there is a capacity on development that can be accommodated. The JRSP allows for an incremental approach, which this policy would give. This would, in practice, be a holding policy for review after the strategic position becomes clearer. If agreement can be reached on a strategy for the whole
area, then this could be introduced into the development plan system by way of an Action Area Plan as part of the LDF system.

**The Proposals Map**

9.23 The plan currently shows most of the land in the extant planning permissions west of the M49 as being safeguarded for employment under policy E3. To the east of the M49 the plan takes a different position, recording simply the area of the extant permission. The difference is due, in part at least, to the interest that had been shown in the possible residential development east of the motorway. That interest is currently in abeyance. I find the distinction drawn by the plan less than satisfactory.

9.24 Decisions on this area need to be taken at a strategic level. It may well be that the long term future of the area does include a substantial element of activities beyond B2 and B8 uses. With a strategic review of the green belt, a chance will be there to look further at the scale and scope of development in this area. This may, for example, extend the extent of the area and widen the range of uses proposed as the best way of achieving the necessary critical mass to fund the comprehensive infrastructure provision that will be needed if this area is to fulfil its role. That is something for the future.

9.25 In the meantime, the plan should show the area currently forming the Severnside area, for which the council intends to work towards a comprehensive strategy. Beyond that, the Proposals Map should show the area currently occupied by existing industry and by WAP 1 as being safeguarded for employment purposes under policy E3. In that way it can focus on the current policy framework and the way the council wishes to progress the area. To depict the area east of the motorway in a different manner at this stage because of possible interest in a residential development seems quite inappropriate, given that that interest appears to be on hold and that it will be for a future strategy to consider the wider issues involved. Nor do the other reasons given by the council to justify a different approach seem to me to be convincing.

9.26 It seems to me that the provision of a junction with the M49 is a pre-requisite for an acceptable, comprehensive development. Although its precise position is not firmly agreed, the approximate location is known. In the very special and exceptional circumstances of this Severnside area, I consider that the plan should safeguard this land for the junction, to avoid it being unacceptably prejudiced by development in the meantime. Bearing in mind the guidance in both PPG12 and PPS12, in the particular circumstances of Severnside, I do not consider that this would raise unacceptable issues of blight.

9.27 If the council wishes to show the area of the 1957 planning consent, then, to reflect its lower status in policy terms, this would be best done within the text of the plan.

9.28 In conclusion, I have drafted a suggested policy for the Severnside area, having regard, in particular, to the versions suggested by Burford and ICI, including that submitted by ICI after the inquiry session. This would probably best be placed within the strategy chapter. It may well be best that the sections in chapters 2, 6 and 7 be brought together into this one place in the strategy chapter. This would reflect the area's strategic importance and provide a more coherent guide to the issues involved.

9.29 Extensive rewriting of the supporting text will be necessary to reflect the approach I have developed in this section. I leave the details for the council to undertake. It will also provide the opportunity to update the text as necessary. On a point of detail, I do not consider that the text should speculate as to whether developers would be expected to provide all the necessary funds to achieve the infrastructure improvements or whether the public purse would be needed to assist funding. Clearly developers should be expected to provide funding,
defined on an equitable and fair basis, but whether that would be sufficient will be a matter for
the strategy to consider.

Recommendation

9.30 I recommend that the local plan be modified by the addition of the following policy to the plan:

"The council is committed to realising the long-term economic potential of the major, strategic location at Severnside. This area is defined on the Proposals Map. This is with a view to achieving a comprehensive, integrated and sustainable form of development with, on current expectations:

i) a broad range of employment uses, based on the extensive opportunities for B2 and B8 uses;

ii) the inclusion of non-employment uses where this complements the employment use, where it accords with the plan’s locational strategy and where it helps to achieve a sustainable pattern of development,

iii) the provision of the necessary highway infrastructure, to include:
   a) an M49 junction,
   b) A link road to the M49 junction
   c) a spine road designed to link through the area to the south
   d) other necessary local road improvements

iv) the provision of a level of public transport that will provide a realistic alternative to the use of the car

v) the balancing of the promotion of the employment potential of the area with the protection and enhancement of the Coastal Zone’s special ecology and landscape, and

vi) the implementation of measures to avoid the unacceptable risk of flooding in the area as a whole.

Existing employment land in Severnside, including the 75 hectares of the WAP 1 development, as shown on the Proposals Map, is safeguarded for employment purposes under policy E3. Within these areas employment development will be permitted provided that it would accord with policy E2 and in particular would;

a) have no unacceptable impact upon flooding, the landscape or the area’s ecology

b) not prejudice the long-term development of the area

c) make a positive contribution to the overall achievement of a sustainable form of development in this area

d) not harm the amenity of local residents,

e) not cause harm to the free flow and safety of traffic on the public highway.
Until a comprehensive development strategy is prepared, no further significant development will be permitted beyond that referred to above.

During the plan period the council will use all its endeavours to encourage the preparation of a comprehensive strategy for development, infrastructure provision and environmental protection at Severnside for the period beyond 2011. Such a strategy will need to be agreed with Bristol City Council and those other agencies involved with the comprehensive planning of this area.

I further recommend that the Proposals Map be modified by the definition of the Severnside area, the deletion of the 1957/58 planning permissions, the reduction of the area subject to policy E3 to that of the existing industrial area together with the WAP 1 area and the definition of an area reserved for the future construction of the M49 junction.

I recommend that the extent of the 1957/58 planning permissions be shown on a figure within the text of the plan.

I also recommend that the supporting text be redrafted to reflect my conclusions and the inclusion of the above policy.

10. Paragraphs 2.28 and 2.29 - Other Urban Areas

Objections

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Issues

Should the plan provide for development as planned urban extensions to Yate and Thornbury?

Should Winterbourne/Frampton Cotterell/Coalpit Heath be considered as an urban area suitable for development?

Reasoning and conclusions

10.1 RPG10, in its visions, seeks to promote a sustainable pattern of development and envisages a concentration of growth at the PUAs. It gives priority to development in urban areas. Under policy SS2 local planning authorities are advised to consider the needs of the whole of their areas and the best opportunities to promote more sustainable patterns of development. Development should take place primarily within the defined PUAs. Where this is not possible, development should be in the form of planned urban extensions. Thus, the emphasis of the RPG is very much on the Bristol urban area.
10.2 The second tier of a hierarchy, Other Designated Centres of Growth, are not applicable to this district. The next level in the settlement hierarchy defined in the RPG is towns which should be designated to act as local service centres for the wider rural areas. Policy SS7 advises that towns should be identified to accommodate smaller scale development to serve local needs and make services available to the rural areas. The relationship of these towns to Bristol is of particular relevance to the district. The final part of policy SS2 indicates that policies should resist the continuing substantial planned expansion of small dormitory towns within easy commuting distance of the PUAs. Paragraph 3.19 goes on to indicate that particular consideration should be given to examining the potential for development to achieve greater self-containment in towns around Bristol. Policy SS19 goes on to give a role to market towns as a focus for development and service provision in rural areas.

10.3 The locational strategy in the JRSP, in policy 2, is not significantly different in its emphasis. Generally, it seeks to concentrate development within and immediately adjacent to the main urban area of Bristol. Beyond that, policy 2d indicates where residential development cannot be accommodated there, the plan looks to settlements with good public transport access to major employment areas and other important facilities. The council suggests that Yate, the much larger of the two main towns outside the PUA, falls within that category. It also considers that Thornbury falls within the subsequent category of where it can be demonstrated that there are practical opportunities to achieve good public transport.

10.4 It seems to me that the council is entirely right to give first priority to the main urban area of Bristol and then to urban extensions to Bristol. In terms of the sequential approach, only where there is a need to look further to accommodate the required levels of development should the council look to the other urban areas of the district, firstly the town of Yate and then Thornbury.

10.5 The guidance that plans should look to the needs of the whole of the district must be seen in the context of the overarching advice on locational strategy and the concentration of development on the PUA. It would be wrong to consider each settlement in the district independently of each other. The sequential approach is to be applied across the district as a whole or otherwise it becomes meaningless. It is right to look at the needs of individual towns such as Yate and Thornbury and to assess how much development would be required to fulfil their designated roles and what would be appropriate in terms of their own, internally generated needs. However, any assessment of their own internally generated requirements for growth must be tempered by the district-wide strategy.

10.6 Thus, I do not see that each settlement should have its own, internally generated, development requirement. Whilst it may be possible to identify need for a level of development on the basis of past growth trends, projected natural growth, the desire to become more self-sufficient and so forth, any such growth must be put into the context of the wider strategy for growth for the district itself. Otherwise, the plan would merely replicate what currently exists. Towns outside Bristol should not necessarily be identified for specific growth.

10.7 I have supported the council’s strategy of concentrating development within and adjacent to the Bristol built-up area. I also support the view that allocations should look to the next tier, the two towns of Yate and Thornbury, only if and when it is necessary to do so. As a result of my considerations elsewhere in my report I do not consider that it is necessary in this plan period to identify allocation sites around Yate or Thornbury. The plan and this report, by definition, concentrate on the pattern of allocations being made by the plan. Aside of the one site I identify within Yate, the lack of allocations does not mean that a halt is placed on the development and growth of those towns. It must not be forgotten that the plan provides for a significant level of development within those towns under the terms of policy H2 and other plan policies. The lack of allocations does not preclude development opportunities coming...
forward within the existing built-up areas. I have no reason to doubt that opportunities for development will arise within those towns.

**Yate/Chipping Sodbury**

10.8 The JRSP contains a specific policy, policy 8, for Yate, the former county's fourth largest settlement. It is a substantial urban area with a reasonably well developed physical and social infrastructure. The text to policy 8 indicates that any substantial housing should not take place before the later part of the plan period and only if it becomes impossible to meet housing requirements within or immediately adjoining the Bristol conurbation. The text goes on to note that the Deposit Local Plan, prepared after the decision to adopt policy 8, states that such development is not required. Policy 8 itself indicates that appropriate public transport and community facilities should be in place or committed before development is commenced. In somewhat contradictory terms, the policy itself goes on to say, in positive terms, that provision will be made for housing development in the later part of the plan period and for employment development to provide for local needs, to reduce out-commuting and to minimise the conflict with other movements.

10.9 Yate, rightly, is considered by the council to be the next most sustainable location for development after planned urban extensions to the Bristol urban area. However, I have found that there is no need for the plan to allocate sites in the Yate area. I have concluded that the housing requirements for the period to 2011 can be met in what I and the local plan consider to be more preferentially sustainable locations. Bearing in mind that housing needs can be met without allocating land here, the explanatory text to policy 8 and the need to secure improvements to public transport and community facilities before development takes place, I do not think that the local plan is in unacceptable conflict with the terms of policy 8 of the JRSP.

10.10 Yate is a well-equipped town in its own right, with a town centre providing a wide range of shopping and leisure facilities, complemented by more local provision within or close to residential areas. It has a level of internal employment which gives it a certain degree of containment. Nevertheless, a high proportion of its economically active population commutes to the North Fringe, Bristol and elsewhere, so that it acts to a fair degree as a dormitory town for the Bristol conurbation. Regional advice is that the local plan should resist the expansion of dormitory towns.

10.11 Those who commute by car to the North Fringe and Bristol add to the substantial congestion on the road network as they approach and continue beyond the M4 corridor. Although Yate has the advantage of its own railway station, the proportion of commuters who use this service is very limited. There is at present only one peak hour train to Bristol from Yate and anecdotal evidence is that the service is so popular with people who travel from further up the line that it does not promise a comfortable journey for those joining at Yate. Casual observation of the station car park shows it to be reasonably full in the middle of the day, but it may of course be used by workers in the industrial estate with which it shares its access. The Council is seeking to address the problems with a number of public transport initiatives. These include a quality bus corridor, probably along A432, and a possible rail turnback facility at Yate station to improve the quality of the service to Parkway and Temple Meads, though the prospect of the latter's being operational within the plan period currently seems remote.

10.12 Residential development here could exacerbate that situation and lead to increased dependency for employment on the Bristol conurbation. At the same time, increases in actual containment could make a contribution to limiting congestion in the North and East Fringes, reducing journey lengths and increasing the use of walking and cycling as the travel mode of first choice for journeys to work. If housing development were to considered appropriate for the town, then it would need in principle to be accompanied by a commensurate level of
employment development to, at the very least, not worsen the high levels of car borne out-commuting. Preferably, it should provide a net surplus of employment to bring some improvement to the situation. In practice, however, that would be achieved only if the new business space were taken up by employment of a type attractive to local residents, and without any resulting vacancy of existing space. It would certainly not be helpful for mixed use development allocations to be made if they turned out to result in even more out-commuting combined with either undeveloped employment land or vacant commercial buildings.

10.13 After much discussion in the inquiry sessions, the question of demand for employment land, and especially for the B1 uses that bring a higher proportion of jobs, remains unresolved in my mind. I do not think that past take-up of new sites alone should be the basis for informing a decision about the future. Equally, the total turnover of all premises does not seem to be a reliable indicator of demand, particularly without supporting analysis based on business in-migration and out-migration. Large and inflexible premises that have become vacant and where there is a reluctance to redevelop bring great uncertainty to any calculation which relies on presently vacant floorspace.

10.14 A robust assessment is needed of the unsatisfied demand for employment land, and for B1 uses in particular. This would give greater certainty to determining the correct balance between housing and employment as a sound basis for the future strategy for Yate. That balance is all-important where the aim is to address the existing high level of out-commuting as well as to improve the employment base in the town in order to offer a wide range and larger scale of opportunities for local residents to work locally.

10.15 Yate has experienced significant levels of development over recent years. There is also some benefit in a breathing space during which the town has the opportunity to develop its community infrastructure to "catch up" with the scale of new housing. Some opportunities will continue to come forward for development on windfall sites within the town over the remaining years of the plan period. Indeed, I support the allocation of a site within the built-up area. At the same time I consider that there is some advantage in trying to improve the employment base in the town in order to offer a wide range and larger scale of opportunities for local residents to work locally. This would help to make the town more self-sufficient and reduce the level of out-commuting to Bristol.

10.16 The JRSP indicates that proposals to extend the green belt around the north and east of Yate, in order to set a clear limit to the future expansion of the town, will be considered in the longer term as part of a future review of the overall locational strategy. This local plan has only a short life, until 2011. There is a commitment for a review of the green belt in the next round of plans. That will look at the most sustainable pattern of development in the medium/longer term, post 2011 period. That process will be the most opportune time to look at the future role of the town and the scale and location of any planned growth. On this basis I do not consider that there is any reason to reach decisions on proposals which could have a fundamental impact upon the future pattern of growth of the town.

**Thornbury**

10.17 The JRSP identifies Thornbury as one of four smaller towns in the former county. Its role in serving the surrounding area will be maintained and enhanced. Opportunities for investment and regeneration and the provision for new local employment, where transport and environmental concerns can be adequately overcome, will be promoted. The text goes on to say that, however, it is not identified as a location for significant additional housing development. It is not well connected to the main public transport network. Policy 4 reflects the need to improve public transport access to employment areas in Bristol. It is not suitable as a strategic location for development. The JRSP goes on to indicate that any development
should be in character, the scale reflecting accessibility to local facilities and wider employment opportunities.

10.18 I find that there is no need for the plan to allocate sites in the Thornbury area. The housing requirements for the period to 2011 can be met in more preferentially sustainable locations. Thornbury has a high level of out commuting and acts to a fair degree as a dormitory town for Bristol. Bus services linking to the North Fringe and to the City centre need to be substantially improved before the town should accommodate further residential development. Proposals for a park and ride/MMI to serve the town and traffic from the north using the A38 are not so developed as to suggest that more development can be accommodated in the town without worsening the commuting situation. Without that and other bus-related improvements, residential development here could exacerbate that scale of car borne out-commuting to the Bristol conurbation. If housing development were to be considered appropriate for the town, then it would need to be accompanied by a commensurate level of employment development to, at the very least, not worsen the high levels of car borne out-commuting.

10.19 I note the view that locally generated housing needs are likely to amount to as much as 1000 houses. I also note the view that peripheral sites here are more accessible to a range of facilities than land at Emersons Green East or Yate. I comment more fully on these issues in chapter 8a of my report.

10.20 Whilst I do not support the allocation of land for housing, I consider that there would be some advantage in trying to improve the employment base in the town in order to offer a wider range and larger scale of opportunities for local residents to work locally. This would help to make the town more self-sufficient and reduce the level of out-commuting to Bristol. The council accepts that at the present time the town does not have a balance of jobs and homes.

10.21 The JRSP indicates that new greenfield employment sites will be limited in scale, and would be identified only where there would be clear benefits to the strategy. I consider that this may well be such a situation. In my view there is a relative shortage of land for local employment. The evidence available suggests that there is little employment land available for development, with only a modest supply of vacant premises suitable for re-occupation or redevelopment. Whilst there are some premises and land available on the Thornbury Industrial Estate, the range and attractiveness of these appears to me to be limited. It seems to me that the allocation of some employment land would present the chance to test the market for new employment provision. I leave that for the council to consider, either by way a modification to this plan or as part of a future Development Plan Document under the new development plan system. In the meantime it should not be used as a stepping stone for any immediate significant level of new housing.

10.22 The future review of the green belt and the associated strategic review of the most sustainable pattern of development in the medium/longer term, post 2011 period, will enable a fresh look to be taken of the future role of the town and the scale and location of any planned growth. It seems to me that with the development of many of the remaining open areas within or immediately adjacent to the North Fringe over the next few years, there may well be a case for a sizeable expansion of the town in future years. Any expansion would have to be based upon the adoption of significant measures to upgrade the employment base of the town, combined with a coherent and extensive package of improvements to provide a choice of means of travel, not least for those commuting into Bristol. I am not satisfied that these can be provided within the plan period.

10.23 On this basis I do not consider that there is any reason to reach decisions on proposals which could have a fundamental impact upon the future pattern of growth of the town. In the meantime I do not consider that the role of Thornbury as a local centre will deteriorate.
Windfall developments have taken place and in the years to 2011, sites are likely to continue to become available. There will remain a number of opportunities for development within the town, including within the town centre. I note the views expressed about the need for land to be allocated for a nursing home. The council is not aware of any demand from private developers keen to provide a home. If there is a demand, then there may be windfall sites within the town that would be suitable for such a use. The council considers that the need for care home and nursing home places for elderly with mental health needs across the district can best be met within the existing general health care provision. The Draft Commissioning Strategy for Social Care Services for Older People and the Mental Health Services Strategy do not identify any need for new nursing home provision within the District.

**Other urban areas.**

10.24 I am satisfied that only two settlements should be defined as being at this level in the plan's settlement hierarchy. Yate is by far the largest urban area outside the Bristol urban area. Thornbury is the next largest. Both have a well defined town centre which offers a good range and scale of services and facilities to serve both the towns themselves and their rural hinterland. I do not consider that there is any other settlement that could be considered to be of the same level of importance. In terms of size, Winterbourne/Frampton Cotterell/Coalpit Heath is not dissimilar to Thornbury. However, otherwise it clearly does not perform the role of a local centre in the same way that Thornbury does. Its facilities and services are very limited indeed for a settlement of this size. There is no real defined focus to the settlement. It has only modest public transport provision and clearly functions essentially as a dormitory settlement to the nearby Bristol conurbation. The fact that it can be discerned on the JRSP Key Diagram does not alter my view that it does not constitute an urban area in the same way as Yate and Thornbury. Likewise, I do not consider that any other settlement in the district can be considered to be an urban area in terms of the plan's settlement hierarchy.

10.25 For these reasons I am content with the wording of the paragraphs on the other urban areas. Bearing in mind my recommendation to define some of the terms used in this strategy section, I consider that it would be helpful to revise the heading to read "The other urban areas – Yate/Chipping Sodbury and Thornbury".

**Recommendation**

10.26 I recommend that the local plan be modified by the deletion of the existing heading and its replacement by: "The other urban areas – Yate/Chipping Sodbury and Thornbury".

11. **Paragraphs 2.30 and 2.31 - Rural Areas and Green Belt**

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**Issues**

Should the plan provide for more housing in the rural areas?

Does the plan give a proper role to other sustainable settlements?

Should the plan, in the interest of a sustainable pattern of development, provide for a reassessment of the green belt

**Reasoning and conclusions**

11.1 Policy SS19 of the RPG indicates that outside market towns development should be small scale and take place primarily within or adjacent to existing settlements. Support for rural areas will primarily be through locating development within market towns. The JRSP, in policy 2, reflects this broad approach. Development in rural areas is to be of a limited scale, within or immediately adjacent to settlements, such development being appropriate to their character, setting and accessibility to local facilities and employment.

11.2 The plan reflects this guidance. Much of the rural area of the district is covered by the very restrictive approach of green belt policies. Elsewhere, none of the rural areas is so remote as to lie outside of the influences of the urban areas. The plan provides for a modest level of development within over 30 villages across the district. It does not promote new allocations in these rural settlements. In my view it would be inappropriate to do so. The strategy calls for a sustainable pattern of development concentrated upon the larger, urban centres. The villages do not and cannot offer the range of facilities and employment opportunities offered by the urban areas. To allow expansion of these rural settlements would be likely to encourage greater use of the car.

11.3 PPG3 calls for a choice of housing and allows for some rural housing to be provided. PPS7 also indicates that new development should be allowed in rural areas to meet local business and community needs and to maintain the vitality of village communities. This has to be read in the context of the totality of guidance and the need for a sustainable pattern of development. The plan does not place an embargo on development within or around villages. It does, however, in practice, limit the scale of such development. For example, policy H2 allows for modest development within village settlement boundaries, whilst the affordable housing policy H7 allows for rural exception schemes.

11.4 Paragraph 70 of PPG3 indicates that villages will only be suitable locations for significant additional housing where it can be demonstrated that additional housing will support local services which could become unviable without some modest growth. It goes on to say that this may particularly be the case where the village has been identified as a local service centre. In this district, as I have said, there are not rural areas that are remote from the influence of Bristol, Yate or Thornbury. Those three urban areas provide a good distribution of facilities and employment opportunities across the district. The plan, reasonably, does not provide for local service centres beyond this level. In villages it is very difficult to show that viability, which may be under threat, can be protected by new development. Certainly, the scale of new development that would be needed to reverse any viability threat is likely to need to be at a very substantial scale compared with the existing village size.

11.5 I look at individual settlements in chapter 8a, housing omission sites. Whilst some villages have better public transport services and better access to employment opportunities I do not find that these factors are of such force as to lead me to vary my support for the council’s approach to the scale of development to be provided for in rural settlements. In my view the plan is right not to allocate sites within or adjoining the rural settlements for further development. The villages may grow slowly, within the terms of policy H2 and H7 and others, and should continue to carry out their existing roles within the rural community.
11.6 With regard to the review of green belt boundaries, I have concluded in chapter 5 of my report that it is not the function of this plan to review the green belt nor to make strategic changes to its boundary. It is quite clear that it will be for the next round of plans, under the new Development Plan system. A sub-regional spatial strategy would seem to be the way forward to undertake a wide-ranging review of the green belt and the best means of achieving a sustainable pattern of development. I believe that it would be useful if paragraph 2.31 made a clear statement that a review of the green belt will be undertaken in the next round of plans.

**Recommendation**

11.7 I recommend that the local plan be modified by the addition to paragraph 2.31 of an explanation that this local plan does not attempt to review the green belt, but that the next round of plans will undertake that in the context of examining the longer-term pattern of sustainable development.
CHAPTER 3 - ACHIEVING GOOD QUALITY DESIGN

1. Policy D1 – Achieving good quality design in new development

Objections

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Support

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<td>Environment Agency</td>
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Issues

Should there be clarification within the explanatory text of the categories, scale and locations of development for which Design Statements and Supplementary Planning Guidance in the form of Development Briefs and Masterplans will be required?

Is Policy D1 overly restrictive and inflexible? Is it too long and should it be made more concise?

Does the Policy conflict with the rigid density standards applied to the Local Plan allocations?

Should Village Design Statements be encouraged and promoted through Parish Councils to help with the future distribution of housing?

Is criterion (B) in Policy D1 necessary, as there is no requirement to enhance such features in planning policy guidance?

Does Policy D1 conflict with paragraph 3.10 and should it be amended to recognise originality and innovation as legitimate design considerations?

Reasoning and conclusions

1.1 It would be inappropriate to require the submission of development briefs and master plans for all development proposals as the level of detail required would depend on the type of application and the nature of the development proposed. The Revised Deposit Plan has provided the opportunity to clarify this through the insertion of a sentence in paragraph 3.8. There is no need for the text to be more specific in providing examples of the categories, scale and locations of development as the Objector has proposed.

1.2 Government policy points to a flexible approach towards the drafting of plan policies by not making them too detailed. However, it would be unwise to build too much flexibility into Policy D1 because it is a policy requiring standards to be met. The Policy allows sufficient flexibility as currently worded and I do not consider that it would constrain the proper consideration of development proposals at the planning application stage or that it is overly restrictive. The purpose of Policy D1 is to ensure that good quality design is achieved and the Policy sets out clear guidance on the factors that the council will have regard to in considering a development proposal. The alternative wording proposed by Swan Hill Homes is vague and would introduce a lack of clarity and I conclude that the plan should not be modified in response to this objection.
1.3 It is clear from PPG3 that whilst high densities can help to make the best use of land, new housing development should not be viewed in isolation. The plan does not seek to introduce a blanket density requirement for all development but applies the advice in PPG3 to individual allocations taking the circumstances of each site into account. Therefore there is nothing in Policy D1 that conflicts with the plan's requirements for making the best use of available land.

1.4 PPS 7 and the Rural White Paper refer to the role of village design statements as a tool to help manage long-term change, providing an opportunity for local communities to engage in constructive debate to help ensure that new development fits its surroundings. As paragraph 3.11 of the Plan sets out the council’s commitment to encourage their preparation, thereby providing support for this approach, no change to the plan is necessary.

1.5 PPG1 clearly sets out the importance of good design. The council has important responsibilities in terms of ensuring that new development is of the highest possible design standard and the wording of criterion (B) clearly expresses the council’s commitment to this. The introduction of criterion (B) does not fail to recognise the social and economic importance of development. The plan should be read as a whole and economic and social aspects of development are dealt with elsewhere in other chapters.

1.6 As regards the HBF's second objection, there is no reason to amend Policy D1 as suggested. The council considers that respect for existing context is the starting point for good design and this is reflected in Policy D1. However, the council does welcome originality and innovative design as part of its approach to good design in paragraph 3.10 and I consider this to be sufficient.

1.7 PCs 204, 205 and 206 replace the words "where appropriate" with more helpful wording. I support those changes.

**Recommendation**

1.8 I recommend that the local plan be modified in accordance with PCs 204 to 206.

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### 2. Paragraphs 3.04-3.12 – Design of Buildings

**Objections**

- 265/505 Persimmon Strategic Land (Western) D1 3.12
- 274/002 South West RSL Planning Consortium D1 3.04-3.12
- 416/007 English Nature D1 3.12
- 448/013 The House Builders Federation D1 3.06
- 448/012 The House Builders Federation D1 3.07
- 448/032 The House Builders Federation D1 3.10
- 448/031 The House Builders Federation D1 3.11

**Support**

- 52/001 The Tortworth Estate Company D1 3.11
- 255/031 Avon Wildlife Trust D1 3.08
- 431/501 Friends of the Earth D1 3.10
- 489/501 Cotswolds AONB Partnership D 13.12

**Issues**

Is the plan being consistent and reasonable in the need for developers to submit a full planning application in AONB and Conservation Areas and to seek further details?
As RSLs are at the forefront of ensuring that housing stock of the future is of the highest quality and sustainable, should the Plan recognise this important contribution to sustainability by offering flexibility in the application of policies to facilitate these innovations?

Should an additional paragraph be added to indicate that appropriate nature conservation surveys should be carried out and an assessment made of likely impacts on habitats and species?

Is the reference to tenure in paragraph 3.6 consistent with advice in Circular 6.98, which emphasises that planning policy should not be expressed in favour of any particular tenure?

Should the Plan clearly define the types of development that will require submission of a design statement?

Should Policy D1 be amended to recognise originality and innovation as legitimate design considerations?

Should advice on the adoption of SPG refer to the need for public consultation to be undertaken in advance of its adoption? Should the local plan accurately reflect the advice on SPG is set out in PPG12?

Reasoning and conclusions

2.1 The conflict identified by Marshfield Parish Council between paragraph 3.12 of Policy D1 and paragraph 4.121 of Policy L13 has been partially resolved in the Revised Deposit Plan through the insertion of a supplementary sentence in paragraph 3.12. This states the council’s intention to use the Town and Country Planning (General Development Procedures) Order 1995 to require further details in a full planning application so as to be able to properly judge the impact of a proposed development on sensitive environments. The council’s additional suggested change (PC 146) would strengthen the text further, substituting the words “will require” for “may require”. I concur with this and conclude that the paragraph should be amended accordingly.

2.2 In response to the objection from Persimmon Homes, the council points out that the types of information required for a full planning application are detailed in the relevant policies in the plan and emphasises that the plan should be read as a whole. In the light of this, no modification to paragraph 3.12 is necessary.

2.3 I note the concerns expressed by the South West RSL Planning Consortium. However, the Policy and text as drafted are sufficiently flexible to allow for innovative design whilst ensuring that design standards are met. The purpose of Policy D1 is to ensure that good quality design is achieved and the Policy sets out clear guidance on the factors that the council will have regard to in considering a development proposal. The introduction of more flexibility could imply a more relaxed or less comprehensive policy position. Therefore no modification is required in response to this objection.

2.4 The insertion of an additional paragraph to indicate that nature conservation surveys should be carried out in circumstances where the location of proposed development is particularly sensitive, together with an assessment of likely impacts on habitats and species is unnecessary. A new paragraph to address this issue has been added after paragraph 4.69 in the Biodiversity and Nature Conservation section of the revised deposit plan. Any impact upon habitats and species should be assessed through the other more relevant policies in the plan, such as those in the Nature Conservation Section.

2.5 Circular 6/98 refers specifically to the role of tenure in local plan definitions of affordable housing. Paragraph 3.6 is not directly concerned with this. As PPG3 promotes the provision of mixed and balanced communities I can see no reason to modify the supporting text.
2.6 It would clearly be inappropriate to require the submission of a development statement for all proposals for new development as the level of detail required would depend on the type of application and the nature of the development proposed. However, the Revised Deposit Plan has provided the opportunity to clarify this through the insertion of a new sentence in paragraph 3.8. In the light of this, there is no need to define the types of development that would require a design statement in the plan as this would result in an unreasonable amount of detail. Furthermore, the need to submit a statement would be a matter for negotiation in any pre-application discussions.

2.7 I have already dealt with the request to amend Policy D1 to recognise originality and innovation as legitimate design considerations in my conclusions on the HBF’s similar objection to Policy D1 above. I re-emphasise that the plan welcomes originality and innovative design, as part of its approach to good design in paragraph 3.10 and no modification to the Policy is required.

2.8 I note that the Revised Deposit Plan has provided the opportunity to overcome the objection that advice on the adoption of SPG should refer to the need for public consultation through the insertion of a new third sentence to paragraph 3.10. Although not formally withdrawn, I consider this objection to be resolved and I shall not comment further.

Recommendation

2.9 I recommend that the local plan be modified in accordance with PC146.

3. Paragraphs 3.13-3.16 – Landscape Proposals

Objection

410/022 Environment Agency D1 3.15

Support

255/028 Avon Wildlife Trust D1 3.15
410/003 Environment Agency D1 3.14
410/502 Environment Agency D1 3.13
416/008 English Nature D1 3.14
416/501 English Nature D1 3.13-3.15
431/502 Friends of the Earth D1 3.15
489/502 Cotswolds AONB Partnership D1 3.15

Issue

Should the opening sentence refer to “…new native planting…in order to protect and enhance appropriate features”?

Reasoning and conclusions

3.1 Paragraph 3.15 encourages the planting of native trees and this is supported by published guidance. However, there may be some instances where the planting of non-native specimens may have particular benefits. The council, for example, states that in urban areas there may be developments where it would not be appropriate to require native species. I do not, therefore consider that the opening sentence of paragraph 3.15 should refer to new native planting as suggested.
3.2 Proposed change PC145 proposes to expand on the matter of new planting and I comment more fully on this in the item below. I support this change, subject to the deletion of "appropriate to" and its replacement by "this is in accord with"

**Recommendation**

3.3 I recommend that the local plan be modified in accordance with PC145, subject to the replacement of "appropriate to" with "this is in accord with".

---

**4. Paragraphs 3.17-3.22 – Access, Safety and Security**

**Objections**

- 180/003 Joint Parishes Consultative Committee D1 3.17
- 254/003 Sodbury Town Council D1 3.17
- 299/003 Westerleigh Parish Council D1 3.17
- 300/003 Dodington Parish Council D1 3.17

**Support**

- 220/016 The Countryside Agency D1 3.19 & 3.43

**Issue**

Should a new paragraph be added after 3.17 to deal with the longer term aftercare of landscape sites, in particular referring to the importance of ensuring their appropriate long term size and long term maintenance?

**Reasoning and conclusions**

4.1 The objectors all request that a new paragraph be added after 3.17. However, paragraph 3.17 relates to matters of access, safety and security, whereas the objections clearly relate to landscape proposals, which are dealt with in the preceding section. I assume therefore that an error has been made and the objectors are actually requesting that a new paragraph be added before 3.17, not after. I deal with this below.

4.2 The Revised Deposit Plan has provided the opportunity to address these objections through the insertion of additional wording in paragraph 3.15, encouraging the future maintenance of trees and hedgerows. The council however, acknowledges that these revisions have made the second sentence of the paragraph difficult to follow and additional suggested changes to the wording (PC145) have been put forward in negotiation with the objectors. I support these recent changes since they help to clarify the text and also meet the objectors concerns about overshadowing. On balance, I therefore consider the revised text in PC145 to be preferable, with one minor change, and I note that the objections have been conditionally withdrawn. I formally recommend the change in the previous section.

**Recommendation**

4.3 I recommend that no modification be made to the local plan.
5. **Paragraphs 3.23-3.29 – Energy Efficiency & Conservation of Environmental Resources**

**Objections**

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**Issues**

Should the references to detailed building design be deleted, as they do not fall within planning legislation?

Should the requirement simply be for an overall good design?

**Reasoning and conclusions**

5.1 In the light of the general thrust of government guidance towards sustainable development, the reference to building design in Policy D1 (G) is necessary and relevant to land use planning and should be retained.

5.2 The suggestions from objectors to delete references to detailed building design or require only an overall good design would therefore weaken the Policy. Similarly the amendments sought in Redcliffe Homes Ltd written statement would not accord with government guidance and would weaken a broadly acceptable policy and its supporting text, as would Arlington Properties suggestion for the first paragraph of the Policy. However, the Policy wording could be amended to reflect a more balanced approach related to appropriate circumstances, which would promote and encourage energy efficient design rather than specifically require it of developers in the absence of site specific arguments. Energy efficient design should be a matter for the council to seek by negotiation, not require, as a balance of factors in accordance with government advice. I suggest alternative wording for Policy D1 (G) below.

5.3 I accept that energy efficiency in building construction is the subject of separate legislation and controls in the Revised Part L of the Building Regulations and it would be inappropriate to use planning legislation to impose separate requirements for the same purposes. However paragraphs 3.25 and 3.28 of the supporting text to Policy D1 only draw attention to the existence of the Building Regulations and other government guidance related to energy efficiency in construction to aid users of the Plan and do not cause unnecessary duplication.

**Recommendation**

5.4 I recommend that the local plan be modified by the rewording of Policy D1 (G) as follows: “The design, density, orientation and location of buildings and associated landscape proposals seek to achieve energy conservation and the protection of environmental resources; and”.

6. **Paragraphs 3.33-3.38 – Overcoming Adverse Impacts and Securing Enhancement**

**Objections**

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Support

40/001 Country Landowners Association  D1 3.33-3.38
410/004 Environment Agency       D1 3.35
416/009 English Nature             D1 3.34-3.38

Issues
Should the paragraph be clarified by reference to the detailed analysis that will take place through the preparation of concept statements and planning briefs?

Should the word ‘substitution’ be used without a definition? Substitution is unlikely to be acceptable should the valued feature be replaced with something different or inappropriate.

Should the Plan be reworded to provide a more positive context for development, which should not solely be seen in an environmental context?

Reasoning and conclusions

6.1 Paragraph 3.34 refers specifically to the role of good design in avoiding or mitigating the negative impacts of development. As paragraph 3.10 already refers to the provision of concept statements and development briefs there is no necessity to repeat this guidance here.

6.2 There is no need to define the word ‘substitution’ in the text. What could be regarded as a matter of substitution would be a matter for the development control stage of development. Such details would be included in the development briefs for the specific sites concerned rather than in the local plan. In addition, the last sentence of paragraph 3.34 makes it clear that substitution works may only be considered appropriate where features cannot be retained or effectively mitigated against and their loss is acceptable. Discussions as to what would be acceptable would take place on a case by case basis.

6.3 It is inevitable that new development will have some impact upon the environment. Paragraph 3.33 does not infer that this impact will be either positive or negative. The positive impact of development is recognised by other parts of the plan, which should be read as a whole. No rewording in the context of this paragraph is necessary.

Recommendation

6.4 I recommend that no modification be made to the local plan.

7. Paragraph 3.42 – Transportation

Objection

40/002 Country Landowners Association  D1 3.42

Issue
Should paragraphs 3.42, 3.43 and 3.44 recognise the essential nature of cars in rural areas to prevent the transport plan from being used as a weapon to prevent rural enterprise? Should the Plan demand urban criteria for rural sites? Should there be a statement recognising the rural position?

Reasoning and conclusions

7.1 I note the objector’s concerns that a sustainable transport strategy would be inimical to the interests of rural enterprise. Clearly, there are likely to be potential problems and conflicts in trying to balance the need for development to sustain rural communities with the
need to avoid large scale sporadic development in the countryside, which would be contrary to sustainability objectives and national guidance which seeks to protect the countryside.

7.2 Local planning authorities have to bear in mind the vital role of enterprises, especially small-scale enterprises, in promoting healthy economic activity in rural areas. However, it is clear from PPS7 that local authorities should have regard to locational considerations and should avoid major developments in locations not well served by public transport or otherwise readily accessible. The plan facilitates this by allowing for rural diversification (Chapter 7 – The Economy). Overall, I am therefore satisfied that there is sufficient scope in the plan to guide and control the development of rural enterprises within the rural areas, without compromising the need to protect the environment. A specific statement recognising the essential nature of cars in the rural area in this section of the plan is not necessary.

**Recommendation**

7.3 I recommend that no modification be made to the local plan.
CHAPTER 4 - ENVIRONMENT

1. Paragraphs 4.1 and 4.2 - Introduction

Objection

40/003 Country Landowners Association 4.001-4.002

Issue

Should the preamble to the chapter recognise that social and economic issues must be taken into account in environmental objectives?

Reasoning and conclusions

1.1 There is no need to amend the preamble to the Environment Chapter to highlight the need for environmental objectives to take social and economic issues into account. The Plan should be read as a whole and the Strategy Statement in Chapter Two sets out the main aims of the plan, including the over-arching aim to ensure that in future, the development and change of use of land in South Gloucestershire is consistent with the principles of sustainable development. This aim reflects the balance that needs to be struck between development and environmental protection and is relevant to the subsequent chapters, which deal with specific topics and types of development within the context of sustainable development.

Recommendation

1.2 I recommend that no modification be made to the local plan.

2. Paragraphs 4.3 to 4.6 - Environmental Assessment

Objection

448/028 The House Builders Federation 4.005

Support

198/001 Marshfield Parish Council 4.003-4.007
267/027 Arlington Property Developments Ltd 4.003-4.007
410/005 Environment Agency 4.005
416/502 English Nature 4.003

Issue

Should the Plan clarify what constitutes a significant effect on the environment, and in requiring the submission of adequate information to assist in determining the application, should the Plan seek to clarify the circumstances in which such submission are required?

Reasoning and conclusions

2.1 It would be inappropriate to try and define the specific circumstances in which additional information would be required in order to determine an application as each case should be treated on its merits, taking into account the nature of the locality and circumstances at the time. No amendment to the Plan is necessary in response to this objection.

Recommendation

2.2 I recommend that no modification be made to the local plan.
SECTION 1 - Landscape - Natural and Cultural Heritage

3. Policy L01 – Landscape protection and enhancement

Objections

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Issues

Does the policy accord with national guidance?

In addition, a large number of detailed objections raise particular points that are covered in my conclusions.

Reasoning and conclusions

3.1 The Landscape Policies L1 and L2 have been substantially redrafted in response to objections to the Plan and the revised policy and text set out the council’s expectations in terms of landscape protection and enhancement. Policy L2 has been deleted. The council has summarised the concerns of objectors as being whether the policy is in line with government guidance on the protection of the landscape and whether it could be amended to make it more fair and effective. Generally, I find that the council’s combination of Policies L1 and L2 is reasonable and less complex than the original two policies. However, I consider that there are aspects of the policy and text that could be reworded to ensure that it accords with government guidance.

3.2 Turning to individual concerns, 144/501 states that it is unclear what landscape character is to be restored or regenerated with respect to degraded landscapes. I concur with the council that it is not possible to be specific in the plan on whether a completely degraded landscape should be restored to either the landscape that existed before or an area of new landscape character. This will depend on the site itself and the development proposed. The supporting text as amended by PC8 clarifies that the council’s Landscape Character Assessment will identify specific character areas (including large-scale degraded areas). The council’s Landscape Strategy will then indicate the appropriate approach in the specific character areas, including the appropriate landscape restoration. The inclusion of any more information on this matter in the plan would result in an unnecessary level of detail.
3.3 The same objector seeks a cross-reference in the Policy to the council’s landscape assessment. In respect of this, the council has put forward a proposed change, PC8, which introduces new text at paragraph 4.15 of the supporting text, which I find to be helpful. PC8 draws attention to the SPG and clarifies the way in which the Landscape Character Assessment and emerging Landscape Strategy will be used to provide the context for a site specific landscape assessment to accord with the requirements of Policy L1. A specific reference to the SPG in the Policy itself is unnecessary since it is not part of the plan itself but is used to elaborate on local plan policy.

3.4 The same objector also requests a note in Policy L1, which accepts that development of the allocated sites will lead to significant changes to the landscape resource and character of those sites. As the policy and text allow development to take place whilst maintaining those key attributes and features that contribute significantly to character, quality and distinctiveness, the note requested by the objector to say that development will change the existing landscape is unnecessary.

3.5 The use of development briefs and management plans to achieve management and improvement of the landscape and well designed developments is covered by paragraphs 3.10 and 3.14 of the Plan. Since the Plan should be read as a whole, a further reference at the end of paragraph 4.19 is unnecessary.

3.6 Concerns are raised by a number of objectors that Policy L1 is overly restrictive, inflexible and unreasonable in requiring enhancement. The Policy criteria in the Revised Deposit Plan require development proposals to conserve or where possible enhance the landscape and this requirement is reasonable in my view, given the special qualities of the landscape types identified in the comprehensive South Gloucestershire Landscape Character Assessment. This accords with RPG 10, and Policy EN1, which states that local authority plans should aim to conserve and enhance local landscape character, plan the protection and enhancement of landscapes within new development and take measures to protect the character of the countryside and the environmental features that contribute towards that character. The approach taken by the council also accords with PPS7, where guidance in paragraph 24 states that tools such as landscape character assessment should provide sufficient protection without the need for rigid local designations.

3.7 I consider that the Policy as currently drafted, subject to my recommendations below, provides the correct balance. The move away from local landscape designations to a character-based approach is in accordance with government guidance and allowance is made in the Policy for mitigation where this is possible. The Plan should in any case, be read as a whole. However, it would be clearer if the first sentence of the Policy was amended, replacing the words “conserved and enhanced” with “conserved or enhanced” to ensure greater consistency with government guidance. This would help to address the particular concerns raised by Redrow Homes, although I do not concur with the objector’s suggested wording. The tests of reasonableness, context and scale requested in 265/506 and the rewording put forward by other objectors, which changes the emphasis of the Policy is unnecessary.

3.8 For those reasons, I do not accept the argument put forward that Policy L1 will be impossible to satisfy for the majority of development proposals, including urban extensions on greenfield land. I find no justification to replace the words “conserve” and “enhance” with the word “respect” as suggested. The requirement to enhance the landscape where possible is reasonable, given the special qualities of the landscape types identified in the South Gloucestershire Landscape Character Assessment and advice in paragraph 24 of PPS7 as referred to above. Policy L1 should remain as currently titled and I do not concur with 298/003’s objection.

3.9 I also dispute the contention that the Policy is unduly onerous or that it serves no real purpose. Neither do I consider that the Policy would hinder the council’s objectives in respect
of landscape as identified under paragraph 4.10 or that it would conflict with Policy D1 of the Plan. My conclusions above are relevant here, particularly the support for the policy approach provided by government guidance. The Revised Deposit Draft together with Proposed Changes PC4 to PC13 also help to clarify the council’s intentions with respect to landscape protection and enhancement and should aid users of the Plan in their application of the Policy to development proposals.

3.10 As stated previously in relation to similar objections elsewhere in this report, I am satisfied that the policies in the Plan are sufficiently flexible to allow the retention of environmental features that contribute significantly to the character and distinctiveness of a location, whilst allowing for good quality urban design. The Plan should be read as a whole, and I emphasise that any assessment should be made in the light of other relevant plan policies, particularly those in the Design Chapter. Policy L1 provides the right balance in weighing the need for development against the need to protect the environment. The introduction of the word “quality” in paragraph 4.13 in the Revised Deposit Draft should also help to address this point. The council also points out that most development is not major development and therefore would not be subject to a master-planning process. In order to achieve high standards and ensure that good practice is followed, the Plan needs to encourage landscape assessment. The proposed changes to paragraph 4.15 further clarify how landscape assessments should be undertaken and is preferable to objectors’ alternative wording.

3.11 As regards the request that Policy L1 recognises that some development will inevitably change the landscape of an area, although this might not be adverse, I do not consider this to be necessary, given the rewording and explanation introduced in the Revised Deposit Draft. Such an amendment would weaken the policy, which is specifically intended to protect and enhance landscape character areas in accordance with government guidance. I consider that the Policy and text provide the right balance and I find no reason to qualify the policy to refer to “usually be permitted” rather than “be permitted only where” as requested.

3.12 396/501 questions the use of the term “viability” in respect of landscape protection. The council explains in its response that the term is used only in relation to features which have been retained due to their significant contribution to the character and distinctiveness of the locality. The council considers that the term is an appropriate way of describing the importance of ensuring that the development is planned in such a way that such features continue to exist successfully in the long term. This is reasonable and is not unduly onerous when read in conjunction with the other policies in the Plan. Policy L1 provides sufficient flexibility to retain important attributes and features of the landscape whilst still allowing for good quality design. Therefore the Policy and supporting text should not be deleted.

3.13 Finally, the council puts forward PC207 in response to my general concerns expressed about the lack of clarity arising from the use of the words “where appropriate” in the policy. This change proposes the transposition of the last two paragraphs of the policy, with the deletion of “where appropriate”. I support this change.

Recommendation

3.14 I recommend that the local plan be modified

i) by the replacement of the words “conserved and enhanced” by “conserved or enhanced” in the first sentence of Policy L1, and

ii) in accordance with PC4, PC5, PC6, PC7, PC8, PC9, PC10, PC11, PC12, PC13 and PC 207.
4. Paragraphs 4.11–4.18B – Landscape protection and enhancement

Objections

265/004 Persimmon Homes L01 4.15
265/507 Persimmon Strategic Land (Western) L01 4.15
426/505 CSJ Planning Consultants Ltd L01 4.18A
512/504 BAE Systems Properties Ltd L01 4.15
514/504 Bovis Homes South West Region & BAE Systems L01 4.013+4.15
514/532 Bovis Homes South West Region & BAE Systems L01 4.18A

Support

410/503 Environment Agency L01 4.11A
410/504 Environment Agency L01 4.11B
410/505 Environment Agency L01 4.18B
416/504 English Nature L01 4.11B
416/505 English Nature L01 4.15
416/506 English Nature L01 4.18A
416/507 English Nature L01 4.18B
416/508 English Nature L01 4.19

Issues

Is the landscape assessment rigorous and sufficiently robust to serve its purpose?

Is the requirement on applicants to demonstrate how landscape quality and visual amenity will be conserved and where possible enhanced in paragraph 4.18A onerous and without justification?

Should a reference be made to urban design principles in the text to ensure that the retention of landscape features does not override good urban design principles?

Reasoning and conclusions

4.1 The Landscape Assessment has been undertaken, in draft, in line with Countryside Agency guidance on best practice and has been subject to extensive consultation. The council clarifies in its response that in line with the character based approach to landscape protection, the Landscape Assessment will not be used to designate sites for protection but to identify key attributes and features which should be conserved and enhanced for their contribution to character and distinctiveness. However, more detailed site specific assessments may be required with individual development proposals as set out in paragraph 4.15 of the Plan.

4.2 265/507 raises further concerns about the text in the Revised Deposit Plan, claiming that there is no comprehensive policy. I disagree. I reiterate my points made in the section above and emphasise that PC8 clarifies how the Landscape Character Assessment and landscape assessments of individual sites will be used to implement Policy L1 effectively.

4.3 Regarding 426/505, I draw attention to my conclusions in respect of Policy L1. The objector raises concerns that the requirement in paragraph 4.18A would be unlikely to comply with government guidelines for planning obligations in Circular 1/97. Similar concerns about the requirements of paragraph 4.18A are raised by 514/532 and 514/504. However, the council proposes to delete paragraph 4.18A through Proposed Change 12 and insert additional text at the end of paragraph 4.13, providing a definition of the “quality” of a landscape to aid users of the Plan instead. I conclude that this is reasonable (see recommendations for Policy L1) and it would help to overcome these objections. There is no need to incorporate the changes suggested by the objectors.

4.4 As stated in response to similar objections raised in respect of Policy L1, I am satisfied that there is sufficient flexibility in the Policy and supporting text to allow the retention of environmental features that contribute significantly to the character and distinctiveness of a location, whilst allowing for good quality urban design. In addition, the Plan should be read as
a whole, and I emphasise that any assessment should be made in the light of other relevant plan policies, particularly those in the Design Chapter. Policy L1 and supporting text, subject to my recommendations above, provide the right balance in weighing the need for development against the need to protect the environment. A specific reference to urban design principles is not needed.

**Recommendation**

4.5 I recommend that no modification be made to the local plan.

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### 5. Policy L02 – Landscape features

**Objections**

- 265/003 Persimmon Homes L02
- 267/014 Arlington Property Developments Ltd L02

**Support**

- 203/003 Frampton Cotterell Parish Council L02
- 220/011 The Countryside Agency L02

**Issues**

Does policy L2 serve any useful purpose?

**Reasoning and conclusions**

5.1 The Revised Deposit Draft has provided the opportunity to substantially redraft and combine the Landscape Policies L1 and L2 in response to objections to the Plan. I draw attention to my conclusions on Policy L1 and I find no need to comment further.

**Recommendation**

5.2 I recommend that no modification be made to the local plan.

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### 6. Policy L03 and Paragraphs 4.27-4.32 – Cotswolds Area of Outstanding Natural Beauty (AONB)

**Objections**

- 40/005 Country Landowners Association L03
- 265/508 Persimmon Strategic Land (Western) L03
- 448/026 The House Builders Federation L03

**Support**

- 310/001 The National Trust L03
- 410/008 Environment Agency L03 4.027
- 489/503 Cotswolds AONB Partnership L03 4.027
- 489/504 Cotswolds AONB Partnership L03 4.028
- 489/505 Cotswolds AONB Partnership L03 4.032

**Issues**

Should the wording of the Policy embrace the supporting text in paragraph 4.27, reflecting Policy N6 in Stroud District Council’s Revised Deposit Plan?
Should the test of the public interest be changed to be more helpful and clear, with consequential amendments to the rest of the policy?

Should the requirement to enhance environmental characteristics be deleted, with rewording to recognise the social and economic importance of development?

Reasoning and conclusions

6.1 The Revised Deposit Plan has provided the opportunity to reword Policy L3 to more closely reflect government guidance, giving priority to the conservation and enhancement of the natural beauty of the landscape over other considerations. The council is also concerned with the economic and social well being of communities in the AONB and this is reflected in the revised paragraph 4.27. The duplication of Policy N6 of the Stroud Revised Deposit Plan is not necessary.

6.2 Policy L3 and the supporting text, as reworded in the Revised Deposit Plan, now reflects government guidance regarding the need for major development proposals in AONBs to demonstrate that they are in the public interest, before being allowed to proceed. Paragraph 4.28 of the Plan provides information on how applications for major developments in AONBs will be assessed and draws attention to the relevant guidance in PPG7. This will need to be redrafted to reflect the replacement of PPG7 by PPS7. No further changes are necessary in this respect.

6.3 448/026 objects to the second sentence of Policy L3, on the basis that whilst there will sometimes be opportunities to enhance environmental characteristics, this should not become a requirement upon development. Such a requirement fails to recognise the social and economic importance of development, which in certain instances will override environmental considerations. However, the objective of designating AONBs is to conserve the natural beauty of their landscapes. To support this, the main objective of planning policy and control is to prevent development that would damage the achievement of this aim. I consider therefore that the Policy as worded provides the correct emphasis. The wording suggested by the Objector would only serve to weaken this intention. In any event, the need to have regard to the economic and social well-being of the AONB is recognised in paragraph 4.27.

6.4 The council proposes PC 208 which deletes the word "appropriate" from the first sentence of the policy. I support this minor change.

Recommendation

6.5 I recommend that the local plan be modified
i) in accordance with PC208, and
ii) by the updating of the text in paragraph 4.28 to refer to PPS7.

7. Policy L04 and Paragraphs 4.34 to 4.47 – Coastal Zone

Objections

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Issues

Is Policy L4 too general, providing a blanket restriction and overly restrictive? Would it preclude a proper and objective assessment of the location of development in the context of the Plan area as a whole and Severnside in particular?

Does the Policy preclude consideration of development associated with existing development such as services and facilities and sustainable new development that will have no detrimental impact on the coast?

Is the area covered by the Policy too extensive and does it cover areas where it is inappropriate and confusing to have such an allocation? Should the area designated under Policy L4 be amended to exclude the Severnside Employment Area or clarified as it conflicts with Policy E3 (10) at Severnside for safeguarded employment area and the extant planning permission for employment uses?

Reasoning and conclusions

7.1 The Revised Deposit Draft Plan has provided an opportunity to clarify that Policy L4 only refers to development within the part of the coastal zone that is undeveloped. It therefore excludes the areas of existing development outlined in paragraph 4.45 of the supporting text, including the area referred to by a number of objectors at Severnside. Policies H2 and E3 and other relevant policies in the plan deal with the types of development acceptable in this and other areas of existing development. In contrast, Policy L4 deals specifically with the remaining “undeveloped” land. A reference to the site-specific planning permissions at Severnside in the Policy itself would be inappropriate and unnecessary.

7.2 In the light of this, and subject to my recommendations below, I do not consider that Policy L4 is overly restrictive or that it will preclude a proper and objective assessment of the location of development as suggested. It is a soundly based policy that is fully justified in the text of the plan. The purpose of Policy L4 is to establish the boundary of the Coastal Zone and the principles for development within it. As the Council points out, any development proposals which come forward would be required to satisfy all relevant policies in the Plan, including Policies L1 and L2, in addition to Policy L4.

7.3 I note that the Revised Deposit Draft Plan has provided the opportunity to overcome the objection from the Environment Agency, through the deletion of the word “acceptable” in the final sentence of paragraph 4.47 and its replacement with the word “agreed”. Although not formally withdrawn, I consider the objection to be resolved and I shall not comment further.

7.4 Valid concerns are raised about the use of the term “International Site of Importance to Wildlife” and PC14 addresses this, rewording the first sentence of paragraph 4.40 appropriately. The Council has also proposed a minor amendment to the text in paragraph 4.41. I consider this to be reasonable.

7.5 The Council acknowledges that it is unreasonable to impose a blanket restriction on all development that does not require a coastal location. The insertion of the word “undeveloped” in the Policy text and related changes to paragraph 4.45 help to clarify this, reflecting the fact that development within the settlements and areas cited in the paragraph are not subject to Policy L4.
Recommendation

7.6 I recommend that the local plan be modified in accordance with PC14 and PC15.

8. Policy L05 – Forest of Avon

Objections

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Issues

Is the policy a reasonable one for the local plan and is the extent of its application appropriate?

Is it appropriate to seek a contribution from developers?

Should greater flexibility be retained in the Policy, and should it be changed to refer to ‘the retention or enhancement of the character and quality of the environment, subject to good urban design principles’?

Is the extension of the Forest of Avon policy across the urban environment illogical and could it lead to substantial ambiguity and misunderstanding of this, and other local plan policies? Would a separate policy for Bristol East Fringe and other urban areas that avoids specific annotation but instead encourages landscaping and tree planting in appropriate locations be preferable? Is an amendment to the inner boundary necessary in conjunction with representations in respect of Green Belt Policy GB1?

Is the Community Forest Area allocation too extensive, covering areas where it is confusing and inappropriate to have such an allocation? Does the specified area conflict with, and create confusion regarding Policy E3 (10) at Severnside?

Reasoning and conclusions

8.1 A number of objectors raise concerns about the geographical extent of the Policy and whether it is reasonable. Although tree planting does not need planning permission, a proposal for a significant change in land-use and landscape as envisaged by the Forest of Avon Plan is important enough to be drawn to the public’s attention. PPS7, at paragraph 33, indicates that the Government’s policy aims include a continued steady expansion of woodland area to provide more benefits for society and the environment. Therefore it is reasonable that the Forest of Avon initiative is supported by a policy in the local plan, designed to secure the protection of the existing forest and seeking its expansion.
8.2 The boundary of the Forest of Avon is set in the Forest of Avon of Plan, which is outside the remit of the local plan. It is not the role of the local plan to review that boundary. I consider that it is helpful that this boundary is identified on the Proposals Map and in the Plan. Similarly, the description and outline of its purposes and its justification that is provided in the supporting text is beneficial to users of the Plan.

8.3 Although I recognise that the Forest boundary covers a large area, I do not consider that the requirements of Policy L5 are either onerous or unenforceable. The requirements of the Policy would not render development projects unviable as suggested. The figure of 30% of the forest area being wooded is an internal target for the Forest of Avon Plan, which is helpfully reproduced in the local plan’s supporting text. It is not a requirement of Policy L5 nor is it prescriptive. Given this, as community forests are a government sponsored initiative that benefit the whole community, it is not unreasonable for the council to seek contributions towards community forest objectives where they are related to development. Given that the wording of Policy L5 is reasonably flexible and Circular 1/97 gives explicit advice on the appropriateness of planning obligations, I find that the Policy wording is reasonable. In addition, the policy supporting text at paragraph 4.52, specifically states that any works required would be directly related to the particular development. PC 209 proposes the deletion of the words "where appropriate". This helps to improve the clarity of the wording of the policy.

8.4 As regards concerns that the supporting text of the Policy duplicates the now replaced PPG7 Annex D too closely, I find that although there was some duplication, the supporting text now provides a useful context for the Policy and is not unreasonable. As stated previously in relation to similar objections elsewhere in this report, I am satisfied that the policies in the plan are sufficiently flexible to allow the retention of environmental features that contribute significantly to the character and distinctiveness of a location, whilst allowing for good quality urban design. The plan should be read as a whole, and I emphasise that any assessment should be made in the light of other relevant plan policies, particularly those in the Design Chapter.

**Recommendation**

8.5 I recommend that the local plan be modified in accordance with PC 209.

9. Policy L06 and Paragraphs 4.56-4.62 – Open areas within the existing urban areas and defined settlements.

**Objections**

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Support

203/005 Frampton Cotterell Parish Council L06

Issues

Is a criteria-based policy an appropriate way of dealing with these concerns?

What sort of contributions should the plan seek to protect?

Is the policy unduly restrictive in its application?

Should individual sites be identified?

Are the criteria clear enough?

Reasoning and conclusions

9.1 The council’s Topic Paper TP4 explains that as a result of recommendations in the landscape study undertaken by consultants to inform the emerging local plans landscape policies (CD063), the council deleted the Areas to Remain Open (Policy L5 in the Consultation Draft Local Plan) from the Proposals Map and replaced them with a criteria based Policy L6 in the Draft Deposit Plan. The council was concerned that Policy L5 was not in line with the character-based approach to landscape advocated by the then PPG7, and felt that specific designations might be difficult to justify. Policy L6 is intended to be relevant to development proposals affecting any area of open land within the defined urban area or settlements. I consider this approach to be satisfactory and properly reflects current national guidance.

9.2 The plan seeks to protect important areas of open land which are valuable in terms of access and recreation (protected under Policies LC9, 11 and 12) as well as those that are important for nature or heritage conservation (Policies L7-L15) and paragraph 4.61 of the plan highlights this. It is also right that it should seek to protect areas of open land that may be valuable in terms of visual amenity and contribution to the landscape. Even without public access, people enjoy having open space near to them to provide an outlook, variety in the urban scene, or as a positive element in the landscape. The quality of the environment in villages and towns is about more than buildings and the character of a settlement is often defined by the amount and distribution of its open spaces which are often irreplaceable. Paragraph 15 of PPG17 states that policies in local plans should generally cover “the protection of private and public open space and other land of recreational, conservation, wildlife, historical or amenity value.” However, I do not consider that Policy L6 should be expanded to include other open space functions as suggested by Redcliffe Homes Ltd as these are already covered by other policies in the Plan. The rewording proposed and the deletion of the reference to Structure Plan Policy 3 is unnecessary.

9.3 Policy L6 is not a blanket designation of open areas. It does not preclude development from all open spaces neither does the protection of a site under Policy L6 preclude all future development. Indeed, in respect of policy H2 I have recommended that there should be not be a policy restriction, on the basis of sustainability issues, to the development of undeveloped sites within defined settlements. Mitigation measures whilst useful may not always be appropriate. However, any development proposal would need to be considered within a balancing exercise which would encompass all plan policies and I am satisfied that there are sufficient safeguards in the plan as a whole to allow the proper weighing of the contribution that an open area makes against other potential benefits such as the provision of suitable residential land. I do not, therefore, consider that the Policy is insufficiently flexible or that it would constrain land supply as has been suggested.

9.4 There is no need to identify individual sites on the Proposals Map as the designation of specific sites could imply a lack of value in other parts of the plan area, conflicting with the
character-based approach. It would also be difficult to create a complete list of sites, particularly as the role of an open area and its value may change and evolve over time. Furthermore, the landscape policies in the plan are not intended to determine the principle of development on a site-specific basis but to ensure that local character and distinctiveness are conserved and where possible enhanced as part of the mitigation measures for development proposals.

9.5 As I concur with the council’s decision to use a criteria-based policy and not show individual Areas to Remain Open on the Proposals Map, the site-specific objections to this policy are no longer relevant. I note the specific concerns raised by Marshfield Parish Council and the council has agreed that the potential areas to remain open in Marshfield be assessed against the criteria in Policy L6 and be identified as L6 sites in the Conservation Area Supplementary Planning Guidance. This is reasonable, given that detailed assessments have been undertaken through the preparation of Conservation Area SPG. A new paragraph 4.60A was also added to the Revised Deposit Plan to recognise the importance of open areas in Conservation Areas and this is welcomed by the objector.

9.6 I accept, however, that the supporting text needs to clarify the criteria that would be used in assessing the contribution of open areas and I note that the Revised Deposit Draft has provided the opportunity to do this. Paragraph 4.59 as amended by PC16, sets out specific criteria illustrating the ways in which an open area may contribute to the quality, character, amenity and distinctiveness of a locality. Paragraph 4.60 explains that the council’s Landscape Character Assessment will help to identify characteristic features of the open areas in South Gloucestershire. Paragraph 4.60A draws attention to the review of the value of open spaces within Conservation Areas in Supplementary Planning Guidance. These paragraphs therefore address some of the objections to the policy and text by clarifying the criteria that would be used to determine the significance of a site and the process of assessment. I do not consider that the contents of the amended paragraph 4.59 need to be included in the Policy text to give it extra weight. The Policy is clear as it currently stands and the criteria in the paragraph support the scope of the policy, although they are not exhaustive.

9.7 Paragraph 4.60 in the plan draws attention to the Landscape Character Assessment referred to by the objector, but for the reasons outlined above, this should not be on a site-specific basis as requested. The Landscape Character Assessment will provide an appropriate context to individual sites, and the council states that developers will need to undertake site-specific landscape assessments to identify particular features, attributes and the amenity of a site within its wider setting. Paragraphs 4.15 and 4.18, in respect of Policy L1, provide further clarification on this. I note the objector’s reference to paragraph 26 of PPG17, which relates to the designation of urban open space on the Proposals Map and in the plan to ensure that its amenity and recreational value to the community are taken into account when considering development proposals. However, the council argues that the process relating to PPG17 reviews is not yet in place but the criteria in Policy L6 will cover the landscape and amenity aspects of open areas.

9.8 I am satisfied that the policies in the plan are sufficiently flexible to allow the retention of environmental features that contribute significantly to the character and distinctiveness of a location, and the quality of the environment, whilst allowing for good quality urban design. The plan should be read as a whole, and I emphasise that any assessment should be made in the light of other relevant plan policies, particularly those in the Design Chapter.

9.9 The council also proposes, by way of PC 158, the deletion of the word “visual” from the term “visual amenity” in the Policy and text. As this is in line with policy amendments in Policy L1 and paragraph 4.59, I consider this to be reasonable.

9.10 The last sentence of the Policy, with the term “where appropriate” lacks clarity. The council proposes PC 210 which improves the understanding of when negotiations would be
appropriate to enhance and manage these areas. I support this change. This revised last sentence of the Policy enables the negotiation of measures to manage open areas as part of development proposals.

**Recommendation**

9.11 I recommend that the local plan be modified in accordance with PC16, PC158 and PC210.

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**Issue**

Does the text give sufficient emphasis to the need to give appropriate regard to this matter?

**Reasoning and conclusions**

10.1 The Revised Deposit Plan has provided the opportunity to highlight the importance of surveying a potential development site for nature conservation interests at an early stage through the insertion of appropriate text in paragraph 4.69A. Proposed Change 17, which substitutes the word ‘sufficient’ for ‘enough’ in paragraph 4.69A, is also helpful. These amendments add greater clarity to the text, aiding users of the Plan and also resolve the objection.

**Recommendation**

10.2 I recommend that the local plan be modified in accordance with PC17.

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**Issues**

Should the Policy and lower case text recognise the existence of the Severnside Permissions following on from paragraphs 2.26 and 2.27 of the Plan?
Reasoning and conclusions

11.1 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the Plan. The Plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy L7 as this policy relates specifically to Sites of International Nature Conservation Interest. Future development at Severnside is addressed in other more relevant policies in the Plan.

11.2 The objective of local plan policy should be to ensure that areas and species of nature conservation value are identified and protected from the impact of potentially damaging development. Government guidance makes it clear that the more important the designation, the more weight should be given to it in decision-making and the more critical should be the scrutiny of development proposals which may cause them demonstrable harm. However, government policy with regard to the Habitats Directive advises that although nature conservation and the presence of protected species can be significant material considerations, development may still go ahead in certain circumstances (paragraphs 27, 47 and Annex A of PPG9). If potentially damaging development may be permitted as an exception in a designated area of nature conservation interest, it would be helpful if the Policy and supporting text could guide planning control in such circumstances. I therefore recommend that additional text be inserted in the Policy to refer to the use of conditions or planning obligations to secure compensatory measures or to minimise loss or damage to the integrity of the site. The supporting text should also be updated accordingly.

11.3 I consider that the clarifications provided by the Council in PC18 and PC19 are also reasonable.

Recommendation

11.4 I recommend that the local plan be modified

i) by the insertion of new text into policy L7 as follows: “Where the development is permitted, conditions will be used, or planning obligations sought, to secure compensatory measures to minimise loss or damage to the integrity of the site.”

ii) by the insertion of a new paragraph following paragraph 4.71 as follows: “Where the development of a site of international importance is permitted, the Council will expect schemes to minimise their impact upon features of nature conservation interest. Where relevant it will be a requirement that these features are retained and managed within the site and opportunities for the improvement and/or creation of new compensatory habitats explored. These objectives will be achieved through the use of appropriate conditions and planning obligations.” and

iii) in accordance with PC18 and PC19.


Objections

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<td>Mrs S K Shallcross</td>
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Should the Policy and lower case text recognise the existence of the Severnside Permissions following on from paragraphs 2.26 and 2.27 of the Plan?

Should the two geological SSSI at Cattybrook as indicated on the Proposals Map be identified in Appendix 4 of the Plan and should sites including Buckover road cutting SSSI, Whitfield Quarry SSSI and similar sites in Cromhall and Tytherington be included in Appendix 4 as Policy L8 suggests they should be?

Reasoning and conclusions

12.1 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the Plan. The Plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy L8 as this policy relates specifically to sites of national nature conservation interest. Future development at Severnside is addressed in other more relevant policies in the Plan.

12.2 I note that the Revised Deposit Draft Plan has provided the opportunity to overcome the objections from Mrs S K Shallcross and Ibstock Building Products Ltd, through the addition of various SSSI to the list in Appendix 4. Although not formally withdrawn, I consider these objections to be resolved and I shall not comment further.

12.3 The council proposes, by way of PC 211, to remove the word "appropriate" from the final sentence of the policy as it is not necessary to the meaning of the policy. I agree and recommend accordingly.

Recommendation

12.4 I recommend that the local plan be modified in accordance with PC 211.

13. Policy L09 and Paragraphs 4.78 and 4.79 – Sites of regional and local nature conservation interest.

Objections

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Support

198/003 Marshfield Parish Council L09
203/006 Frampton Cotterell Parish Council L09
349/007 Hewlett-Packard Ltd L09
410/511 Environment Agency L09
410/512 Environment Agency L09 4.78
410/513 Environment Agency L09 4.79
410/514 Environment Agency L09 4.80

Issues

Should various sites be added to or deleted from the plan? Should the plan clarify how this is to be done?

Does policy L9, as revised, weaken the protection of sites that are not designated SNCIs?

Does the application of Policy L9 need to be clarified? Should the supporting text at paragraph 4.79 cross refer to the development allocations made in the plan and the site specific assessment of impact and mitigation either through an environmental assessment where necessary or otherwise through a planning brief?

Should the Policy and text recognise the existence of the Severnside Permissions following on from paragraphs 2.26 and 2.27 of the Local Plan?

Should it be clarified that the quarry at Cattybrook is designated as an area of Local Nature Conservation Interest for geological rather than ecological reasons? Should an additional sentence be added to the Policy to ensure that a buffer zone is created around the quarry at Cattybrook, preventing residential development?

Reasoning and conclusions

13.1 I note the site specific objections from the Joint Parishes Consultative Committee, Sodbury Town Council, Westerleigh Parish Council, Dodington Parish Council and Mr T Blythe but it is not the role of the local plan to designate new candidates for sites of nature conservation value. This is a matter for the appointed Panel, with representatives from South Gloucestershire Council, English Nature, the Environment Agency, Wildlife Trust and Bristol Regional Environmental Records Centre. However, the Council is undertaking a rolling survey programme of wildlife sites to inform the selection process and the sites identified by the objectors have been added to the list of sites to be surveyed.

13.2 Similarly, it is not the role of the local plan to delete existing Sites of Nature Conservation Interest (SNCI). The sites identified by the objectors at Hanham Business Park, Abbots Road, The Rosary at Emersons Green, land at Engine Common and land to the east of Severn Beach have been added to the list of sites to be reconsidered. It would, however, be helpful if the supporting text to Policy L9 clarified that the SNCIs are regularly reviewed and surveyed and set out details of the procedures. PC21 amends paragraph 4.78A accordingly and helps to meet objectors valid concerns. I do not agree however, that the information should be set out explicitly in the Policy itself. This would result in unnecessary duplication.

13.3 Concerns are also raised that the revision of Policy L9 weakens the protection for sites that are not designated as SNCIs. Policy L9 was revised in response to an objection from the Government Office for the South West and advice in PPG9 on the basis that the Policy covers more than just sites which have been designated as SNCIs. The Council considers that the revised wording of Policy L9 strengthens the position of non-designated sites and I agree. However, PC20 deletes paragraph 4.78 and inserts new text to clarify that the Policy covers all
locally important nature conservation sites and not just SNCIs and this is also helpful. Policy L9 should not be amended to refer only to SNCIs and RIGS as requested by the National Farmers Union. The Policy is in line with advice in PPG9, and refers to sites of nature conservation value whether or not they are designated as RIGS or SNCIs. Paragraph 4.84 of the Plan explains that there are other natural assets in the district in addition to designated SNCIs and PC20 helps to clarify this further.

13.4 The Revised Deposit Draft has provided an opportunity to expand the policy text to include a brief reference to development allocations in response to objection 267/020. However, a reference in the Policy to the site-specific assessment of impact and mitigation is unnecessary as environmental assessments are already covered in paragraphs 4.3 to 4.6 in Chapter 4 of the Plan.

13.5 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the Plan. The Plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy L9 as this policy relates specifically to sites of regional and local nature conservation interest. Future development at Severnside is addressed in other more relevant policies in the Plan.

13.6 The Council confirms in its Schedule of Objections and Representations to the Deposit Draft and Revised Deposit Draft Plan (Volume 2, page126) that the area designated under Policy L9 at Cattybrook Quarry relates to a Regionally Important Geological Site (RIGS) designation. I note the objector’s additional concerns about the need to create a buffer zone around the existing brickworks site but this is a matter for the Minerals and Waste Local Plan and I find no justification to refer to it in Policy L9.

13.7 The objection from the Environment Agency draws attention to the wording of paragraph 4.70. However, it appears that an error has been made as the wording referred to actually relates to paragraph 4.79. The Revised Deposit Draft Plan has in any case provided the opportunity to address the concerns raised through the redrafting of paragraph 4.79 and the insertion of a new paragraph 4.80. Although not formally withdrawn, I consider the objection to be resolved and I shall not comment further.

13.8 The Council has proposed another amendment to the text (PC22). This clarifies that reference is specifically being made to development that would affect a site of nature conservation or geological interest in line with the text in the Policy. I consider this to be reasonable.

Recommendation

13.9 I recommend that the Local Plan be modified in accordance with PC20, PC21 and PC22.

14. Policy L10 and Paragraphs 4.93 and 4.94 – Species protection

Objections

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Issues

Should the Policy and lower case text recognise the existence of the Severnside Permissions following on from paragraphs 2.26 and 2.27 of the Plan?

Is the additional protection, beyond EC Directives, in the form of local plan policy necessary? Is the Policy vague and unclear and thus likely to lead to uncertainty? Should the meaning of 'indirectly having an adverse affect' be clarified?

Reasoning and conclusions

14.1 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the Plan. The Plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy L10 as this policy relates specifically to species protection. Future development at Severnside is addressed in other more relevant policies in the Plan.

14.2 Paragraph 47 of PPG9 makes it clear that the presence of a protected species is a material consideration when a local planning authority is considering a development proposal, which, if carried out, would be likely to result in harm to the species or its habitat. It is therefore reasonable for a local planning authority to include a local plan policy about species protected under British and European law, if it so wishes.

14.3 I do not agree that the Policy text in the Revised Deposit Draft is vague and unclear. The Council indicates that the phrase "indirectly having an adverse effect" reflects the way in which ecology is interactive and not necessarily confined to specific sites. The Policy provides adequate guidance for applicants and the supporting text sets out the relevant legislation and circumstances requiring the commissioning of a survey to establish the presence of protected species. Paragraph 4.94 explains that where development is permitted, the Council will normally impose conditions or seek to negotiate planning obligations to safeguard the species. There is no justification to delete the Policy as suggested.

14.4 The Council has proposed an amendment, PC23, to paragraph 4.91, clarifying the relevant legislation. I consider this to be reasonable. It also proposes, by way of PC 212, to delete the word "appropriate" from the policy as it is not necessary to the meaning of the policy. I agree.

Recommendation

14.5 I recommend that Policy L10 be modified in accordance with PC23 and PC212.

15. Policy L11 and Paragraphs 4.98-4.100 – Historic parks and gardens and battlefields

Objections

180/008 Joint Parishes Consultative Committee L11
254/008 Sodbury Town Council L11
283/010 Government Office for the South West L11 4.98-4.99
300/009 Dodington Parish Council L11
422/001 Mr & Mrs Grimster L11 4.100
Support

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Issues

Should additional wording be added as per L12 to seek the funding of works to excavate, survey, record and preserve historic gardens etc. prior to development?

Should Yate Court be included in the list of historic parks and gardens in Appendix 7?

As paragraphs 4.98 and 4.99 indicate that the LPA is seeking to protect locally designated parks and gardens, should the Plan have a Policy to that effect and should the local designations be shown on the Proposals Map?

As the use of the word ‘vicinity’ is vague and imprecise in its meaning, should it be changed to specify an exact location to either ‘within the curtilage of’ or ‘adjacent to’ to provide increased certainty?

Reasoning and conclusions

15.1 Additional policy wording to seek the funding of works to excavate, survey, record and preserve historic parks, gardens and battlefields prior to development is unnecessary. The plan states that the implementation of Policy L11 will be through development control and Section 106 agreements and this is sufficient.

15.2 The Council explains in its Schedule of Objections and Representations (page 148, Volume2) that Yate Court was omitted from Appendix 7 of the Plan because it was not included in the original Gazetteer of Historic Parks and Gardens in Avon. The Gazetteer for South Gloucestershire is currently being updated and Yate Court is to be resurveyed to determine whether it meets the criteria for inclusion. Until this is established, there is no reason to include it in the Appendix as requested. I note however, that Yate Court is recorded on the Sites and Monuments Record and it is therefore protected from the impact of potentially damaging development by Policy L12 of the plan, which deals with archaeology.

15.3 Paragraphs 4.98 and 4.99 seek to protect a number of historic parks and gardens of local importance to South Gloucestershire that are not included on the English Heritage Register. This is reflected in the policy, though for clarity purposes the policy could be rephrased to refer to "historic parks and gardens and registered battlefields". I see no reason to change the wording further. These sites are listed in Appendix 7.

Recommendation

15.4 I recommend that the local plan be modified by the rewording of the policy to refer to "Historic parks and gardens and registered battlefields".

16. Policy L12 - Archaeology

Objections

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Support

203/008 Frampton Cotterell Parish Council L12

Issues

Should there be a mechanism to protect sites of local importance that may not be on a register so that concerns may be raised on unregistered sites when a threat appears?

Is this policy and others flexible enough to facilitate and support well designed schemes?

Should the sites or landscapes of archaeological interest or high archaeological potential be identified on the Proposals Map, in accordance with paragraph 15 of PPG16?

Is the Plan consistent with the guidance in paragraph 21 of PPG16?

Should the Policy and lower case text recognise the existence of the Severnside Permissions following on from paragraphs 2.26 and 2.27 of the Local Plan?

Reasoning and conclusions

16.1 I appreciate concerns raised by the Joint Parishes Consultative Committee and others, but I consider that the plan when read as a whole gives sufficient protection to sites of local importance. In the case of the local ditch in urban Yate, any impact upon ecological interests would be assessed through other more relevant policies in the Plan such as Policy L9, which relates to sites of regional and local nature conservation interest. Any impact upon sites of local historic or archaeological importance, including important local buildings would be assessed through Policy L12, whether such sites were listed on the Sites and Monuments Register or not.

16.2 As stated previously in relation to similar objections elsewhere in this report, I am satisfied that the policies in the plan are sufficiently flexible to allow the retention of environmental features that contribute significantly to the character and distinctiveness of a location, whilst allowing for good quality urban design. The plan should be read as a whole, and I emphasise that any assessment should be made in the light of other relevant plan policies, particularly those in the Design Chapter. I conclude that no change is necessary in response to this objection.

16.3 Paragraph 15 of PPG 16 explicitly states that proposals maps should define the areas and sites to which policies should apply. The Proposals Map should ideally therefore be amended to include the areas referred to by the Government Office. However, in view of the very high number of such sites this appears not to be a practical proposition. Whilst paragraph 21 of PPG16 states that local planning authorities may only request archaeological field examinations, I do not consider that the wording of Policy L12 is unreasonable in refusing to grant permission in cases where archaeological assessments or field examinations are not provided. Paragraph 6 of PPG 16 states that archaeological remains should be seen as a finite non renewable resource. Given this it would not be reasonable for the Council to make development control decisions that could lead to the loss of valuable archaeological remains without the necessary level of information.

16.4 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the plan. The plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy L12 as this policy...
relates specifically to archaeology. Future development at Severnside is addressed in other more relevant policies in the plan.

16.5 The council proposes, by way of PC213, to delete the words "where appropriate" from the policy, to clarify the intent and to add the balance of that sentence to the third paragraph of the policy. I support this suggested change.

**Recommendation**

16.6 I recommend that the local plan be modified in accordance with PC213.

**17. Policy L13 – Conservation Areas**

**Objections**

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**Issues**

Should criterion (F) be deleted, as the explanatory text does not give any justification for its inclusion and no explanation as how it would be applied, and it lies outside the scope of PPG15?

Is a new Policy needed to protect clusters of listed buildings, preserving the setting, not just the fabric of the individual buildings?

Should changes be made to Conservation Areas in the Yate area?

**Reasoning and conclusions**

17.1 I note the concerns raised about likely delays in the implementation of development proposals arising from criterion (F). I also note the council’s argument that paragraph 4.27 of PPG15 makes it clear that where buildings make a positive contribution to the character and appearance of a conservation area then they should be retained. PPG15 also requires demolition of such buildings to be assessed against the same broad criteria as for listed buildings. However, requirement (F) lies outside the remit of the plan and it should be deleted. Paragraph 4.122 should be updated accordingly, although I do not accept the objector’s proposed wording. This would go against the general presumption against the demolition of buildings which make a positive contribution to conservation areas as set out in the PPG.

17.2 A number of objectors raise concerns that groups of listed buildings can have a cumulative value which is greater than the individual buildings themselves, and argue that this point is not sufficiently acknowledged in the Plan. Paragraph 2.17 of PPG15 deals with this matter, stating that "the setting of individual listed buildings very often owes its character to the harmony produced by a particular grouping of buildings (not necessarily all of great individual merit) and to the quality of spaces created between them". The council has sought
to address this through a proposed change, PC159, of wording in the supporting text to Policy L14, which I understand would meet the objections. I consider this to be reasonable.

17.3 The council states that the amendments sought for the Chipping Sodbury Conservation Area will be addressed as part of the conservation area review for Chipping Sodbury, with local communities being involved in the consultation process. Similarly, the designation of new conservation areas lie outside the remit of the local plan, and are not before me for consideration.

17.4 The council proposes, by way of PC214, to delete the words "where appropriate" from the policy as it is unnecessary. I agree.

Recommendation

17.5 I recommend that the local plan be modified
i) by the deletion of criterion F,
ii) by the rewording of paragraph 4.122 to reflect the above, and
iii) in accordance with PC159 and PC 214.


Objections

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<td>203/009</td>
<td>Frampton Cotterell Parish Council L14</td>
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Issues

Could the last paragraph be construed as approving enhancement, rather than preservation of listed buildings, contrary to the provisions of primary legislation? Does the paragraph/policy need to be reworded to remove the potential confusion between enhancement of the setting and enhancement of the building?

Should greater flexibility be retained in Policy L14, changing the wording to refer to "The retention or enhancement of the character and quality of the environment, subject to good urban design principles"?

Should the First Deposit wording of Policy L14 be reinstated as it gave a much clearer criteria based policy in relation to the demolition of Listed Buildings?

Should the Policy be amended to provide guidance relating to the demolition of Listed Buildings in accordance with PPG15?

Reasoning and conclusions

18.1 The Revised Deposit Plan as amended by PC24 has provided the opportunity to meet the objection regarding preservation and enhancement. I consider the amendments to be reasonable, with the replacement of "where appropriate" with the more helpful "where relevant, achievable and desirable".
18.2 I draw attention to my conclusions in respect of similar objections to other policies in the plan. I am satisfied that the policies in the plan are sufficiently flexible to allow the retention of environmental features that contribute significantly to the character and distinctiveness of a location and the quality of the environment, whilst allowing for good quality urban design. The plan should be read as a whole, and I emphasise that any assessment should be made in the light of other relevant plan policies, particularly those in the Design Chapter.

18.3 The remaining objections raise valid concerns about the omission of policy guidance relating to demolition of listed buildings. The council states that the guidance was removed from the Policy and paragraph 4.128 in response to an objection from the government office who reasoned that policies should not be drafted in a way that appears to accept that exceptions will be made on a regular basis. As a result of the changes to Policy L14 and the deletion of paragraph 4.128, the government office has withdrawn its objection. In my view, Policy L14, subject to my recommendations below, provides adequate guidance on development involving the extension or alteration of listed buildings but I agree with the objectors that policy guidance should also be provided on the subject of demolition. Listed buildings are a finite resource and there should be a general presumption in favour of their preservation. Demolition should only be permitted in exceptional circumstances and the council should draw on advice in PPG15 and insert a new policy, setting out criteria against which proposals for demolition should be judged. The Planning Officer Society publication “Better Local Plans, A Guide to Writing Effective Policies” provides an example of such a policy, and this would aid users of the Plan and help to meet the objections. I leave the council to determine the precise wording to be used. I do not consider that Policy L14 as set out in the First Deposit Draft is acceptable or that it should be reinstated.

**Recommendation**

18.4 I recommend that the local plan be modified

i) in accordance with PC24, subject to the deletion of "where appropriate" and its replacement with "where relevant, achievable and desirable", and

ii) by the inclusion of a criteria based policy and supporting text, setting out how proposals for demolition would be judged.

19. **Policy L15 and Paragraphs 4.134-4.135 – Buildings and structures which make a significant contribution to the character and distinctiveness of the locality.**

**Objections**

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<td>374/007</td>
<td>Thornbury Town Council</td>
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**Issues**

Is the Policy necessary since it amounts to a listing of buildings that are not of sufficient standing to be listed by English Heritage and requires their enhancement?
Is the policy capable of implementation and should the properties be identified on the Proposals Map?

Would a policy encouraging the re-use of all rural buildings so that they can be maintained be preferable?

Should greater flexibility be retained in Policy L15, changing the wording to refer to “The retention or enhancement of the character and quality of the environment, subject to good urban design principles”?

Should the Policy be extended to include historically interesting and important features such as stone stiles, old kissing gates, walls and bridges as these are not protected specifically elsewhere unless they fall within a conservation area?

**Reasoning and conclusions**

19.1 A number of objections question the necessity of Policy L15, and concerns are raised that it seeks to impose an additional level of protection for buildings beyond that provided for by government guidance. The Policy has been redrafted in the Revised Deposit Plan to reflect the council’s intention to protect buildings and structures for the contribution that they make to local character and distinctiveness rather than for their intrinsic historic or architectural importance. This approach generally accords with the design and landscape Policies D1 and L1 in the plan and it does not conflict with the protection afforded to statutorily Listed Buildings. The council intends to adopt supplementary planning guidance, which is subject to public consultation, and will helpfully identify buildings to which this Policy will apply. I find this approach to be reasonable and I see no reason to delete the Policy as requested.

19.2 Regarding the request for a policy to encourage the reuse of all rural buildings, I draw attention to Policy E6. This deals with the conversion and reuse of rural buildings.

19.3 The Revised Deposit Draft has also provided the opportunity to extend protection to the historic features referred to by 317/001. Such features have been included in the survey of buildings of local importance carried out by the council and the revised text now includes a reference to “structures” as well as buildings, helping to meet this objection. The council also points out that such structures are also protected by policies L1 Landscape Features, and L12 Archaeology.

19.4 I am satisfied that the policies in the plan are sufficiently flexible to allow the retention of environmental features that contribute significantly to the character and distinctiveness of a location and the quality of the environment, whilst allowing for good quality urban design. The plan should be read as a whole, and I emphasise that any assessment should be made in the light of other relevant plan policies, particularly those in the Design Chapter.

19.5 The council proposes, by way of PC215, to delete the word "appropriate" from the second part of the policy as it does not add to the meaning of the policy. I agree.

**Recommendation**

19.6 I recommend that the local plan be modified in accordance with PC215.

20. **Policy L16 – Protecting the best agricultural land**

**Objections**

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<td>519/505</td>
<td>George Wimpey UK Ltd</td>
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L16
Issues
Should the Policy be more flexible as agricultural land quality is only one of the factors to be considered? Where development is required should the Policy state that the LPA will seek to retain the highest grade land where possible?

Is the proposed modification consistent with government guidance in PPG7? Where there is a choice between lands in grades 3b-5, should the Policy ensure that developers seek to use lower quality land first, except where other sustainability considerations suggest otherwise? Should developers be expected to demonstrate an overriding need for development?

Should the Policy and text recognise the existence of the Severnside Permissions following on from paragraphs 2.26 and 2.27 of the Plan?

Reasoning and conclusions

20.1 Objectors raise various concerns about whether Policy L16 meets the guidance set out in the then partially revised PPG7 (March 2001). The Revised Deposit Draft provided an opportunity to reword the Policy and the council has put forward further updates through Proposed Changes PC25, PC26 and PC27 to reflect the latest government advice. Whilst these changes go some way towards meeting the objections, I do not consider that the Policy as currently worded reflects the greater degree of flexibility introduced by the updating of the PPG in the form of PPS7. I therefore consider that the policy should be phrased in a more positive manner, drawing on the specific advice in the PPS that development affecting the best and most versatile agricultural land should be avoided, with preference given to poorer quality land, except where this would be inconsistent with other sustainability considerations. The supporting text should be revised accordingly.

20.2 The rephrasing of Policy L16 would better reflect the government’s new approach to ‘best and most versatile agricultural land.’ It would allow the council to protect the best and most versatile agricultural land and would not undermine the council’s housing strategy. Furthermore, it would not be detrimental to government policy encouraging farm diversification.

20.3 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the plan. The plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy L16 as this policy relates specifically to the protection of the best agricultural land. Future development at Severnside is addressed in other more relevant policies in the plan.

Recommendation

20.4 I recommend that the local plan be modified

i) by the redrafting of the first part of the policy to read:

"Development on the best and most versatile agricultural land (Grades 1, 2 or 3a) will only be permitted where:

1. The development cannot be accommodated on previously developed sites, or on land within a defined settlement boundary, or on poorer quality farmland (Grades 3b, 4 or 5) or

2. Development of poorer quality farmland would be inconsistent with other sustainability considerations." and

ii) by the revision of the supporting text to reflect the above.
21. **Policy L17 and Paragraphs 4.141, 4.142 and 4.146-159 and Fig 4.5 – The water environment**

**Objections**

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<td>Environment Agency</td>
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<td>Environment Agency</td>
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**Issues**

Do the two parts of the Policy lend themselves to individual policies?

Should Policy L17 be strengthened to ensure that the discharge of raw sewage, in whatever concentration, into open watercourses is eliminated?

Should the Policy be more explicit regarding SUDS?

Should the Policy and lower case text recognise the existence of the Severnside Permissions following on from paragraphs 2.26 and 2.27 of the Local Plan?

**Reasoning and conclusions**

21.1 I note that the request by the Environment Agency for Policy L17 to be split into two policies has been met in the Revised Deposit Draft, with Policy L17 dealing with the general water environment and Policy L17A dealing specifically with SUDS. This seems to be reasonable and there is no need for me to comment further.

21.2 203/019 is concerned that there should be no obstruction or interference with the ancient watercourses that drain the former mines of the North Bristol Coalfield. I draw attention to Policy EP2, Flood Risk and Development, which protects the water environment from activities which would threaten water quality or quantity, including polluting discharges such as raw sewage. The supporting text to Policy L17 sets out the main water resource issues and paragraph 4.140 refers specifically to Policy EP2. In addition, paragraph 4.143 draws attention to the main sources of water pollution and highlights the particular problems of the River Frome, stating that development proposals will need to demonstrate that they pose no risk of foul sewage pollution to water courses. In the light of this, Policy L17 does not need strengthening as suggested.

21.3 A number of concerns are raised that the Policy on SUDS could be used to prevent development unreasonably. The council has agreed that the requirement for SUDS should be qualified and the word “possible” has been replaced with “practicable” in Policy L17A in the Revised Deposit Plan. I support this approach, given the increasing importance attached to SUDS by the government in planning policy guidance, and it would be unwise to introduce further flexibility into the Policy, since it requires specific standards to be met. I do not consider therefore that the Policy would constrain the proper consideration of development proposals, providing that appropriate measures are taken to mitigate potential impacts on the...
water environment. The Policy does acknowledge that there may be cases where it is not possible to incorporate SUDS principles. However, the developer will need to demonstrate, to the satisfaction of the Environment Agency and the Local Planning Authority that the inclusion of such techniques is not appropriate and identify an acceptable alternative method of surface water disposal. Further guidance is provided in the supporting text, with specific attention being drawn to the Environment Agency’s Guide to Surface Water Best Management Practices and the supplementary planning guidance being produced by the council. This reflects the positive promotion of SUDS in planning policy guidance and the amendments suggested by 265/010, 285/002 and 448/023 are unnecessary.

21.4 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the plan. The plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy L17 as this Policy relates specifically to the water environment. Future development at Severnside is addressed in other more relevant policies in the plan.

21.5 Other objections have been met by the revised deposit version of the plan.

**Recommendation**

21.6 I recommend that no modification be made to the local plan.

**22. Policy L17A – The water environment**

**Objections**

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<td>265/509</td>
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**Support**

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<td>Environment Agency</td>
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**Issues**

As SUDS are not a practicable solution to the problems of flooding in Oldbury-on-Severn should a new paragraph be added saying that SUDS could become overwhelmed in storm conditions?)

Is Policy L17A too restrictive? Should it be clarified that SUDS are not a requirement and that they should be used only where practicable, otherwise alternative means of water drainage should be incorporated?

Is the Policy poorly worded and is it unnecessary? Should it be reworded to remove the current uncertainty?

**Reasoning and conclusions**

22.1 I sympathise with concerns raised by Oldbury-on-Severn Parish Council. However, Policy L17A makes it clear that the use of SUDS may not be practicable in every situation. The Policy and supporting text promotes SUDS as a way of mitigating harm from surface water runoff. It does not imply that SUDS will be able to prevent flooding in all circumstances. The Policy clarifies that alternative means of mitigation to SUDS may be used if necessary. If this cannot be achieved, then the proposed development would be prevented under criterion (D) of Policy EP2, which deals specifically with flood risk and development. In my view, adequate safeguards have been provided in the plan through the inclusion of Policies L17, L17A and EP2.
to prevent inappropriate development in this context. Policy EP3 on coastal defences is also relevant. The amendments sought by the objector are unnecessary.

22.2 I do not agree that Policy L17A is too restrictive, given the increasing importance attached to SUDS by the government in planning policy guidance, particularly PPG15 and I draw attention to my conclusions on the related objections to Policy L17. The Revised Deposit Draft has provided the opportunity to clarify that SUDS should only be used where practicable and any further rewording could weaken the policy contrary to government objectives. I do not agree that the Policy is poorly worded or unnecessary.

Recommendation

22.3 I recommend that no modification be made to the local plan.

SECTION 2 – Environmental Protection


Objections

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Issues

Is the Policy’ necessary and is its wording sufficiently precise particularly regarding the potential health implications of development? Similarly are the Policy’s requirements unduly stringent?

Should the Policy refer to the existence of "Severnside permissions" referred to in paragraphs 2.26 and 2.27 of the Local Plan?

Should Paragraph 4.180 of the Policy’s supporting text refer to the potential health risks of Electromagnetic fields?

Should the reference to LEAPS in the Plan be removed as these are no longer being produced?

Does the Policy conflict with other Plan policies, particularly in relation to the allocation of land for housing at Northfield?
Reasoning and conclusions

23.1 Regarding the precision and necessity of Policy EP1, I find that following Revised Deposit changes the Policy is sufficiently precise and that the Policy’s requirements are not unduly stringent. They reflect national guidance on health risks. Although some aspects of this Policy are replicated elsewhere, it is beneficial for the plan to have an overarching Policy dealing with this important matter. Similarly I find that as the rewording of the Policy in the Revised Deposit now refers to a test of unacceptable harm, this would allow the effects of mitigation to be taken into account as part of an overall assessment of the effects of the development.

23.2 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the plan. The plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy EP01 as this Policy relates specifically to the effects of Environmental Pollution. Future development at Severnside is addressed in other more relevant policies in the plan.

23.3 The council has made further changes, via PCs 29, 30 and 31, in respect of the wording of paragraph 4.180. I am content that the latest wording reasonably reflects national guidance on the issue of public concern about health risks from electromagnetic fields.

23.4 I recognise that the Environment Agency has terminated the LEAP (Local Environment Agency Plans) process and is transferring the targets and aspirations contained in these documents to its Corporate Plan. The wording suggested by the council in PC28 as a replacement for paragraph 4.177 adequately reflects these changed circumstances.

Recommendation

23.5 I recommend that the local plan be modified in accordance with PCs 28 to 31.

24. Policy EP02 – Flood risk and development

Objections

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Issues

Does the Policy place undue emphasis on the provisions of Policy L17 in relation to fluvial flood risk caused by further development in Thornbury?

Should the Policy allow further development in North Road Yate on the grounds of Flood Risk?
Is it necessary for the Policy to take a more rigorous stance on development in the flood plain, particularly in relation to the effect of flood waters and surface water run off on farm land?

Should the Policy refer to the existence of “Severnside permissions” referred to in paragraphs 2.26 and 2.27 of the Local Plan?

Is it necessary to include information on flood risk data on the Proposals Map? Does figure 4.6 meet this requirement?

Should the reference to Circular 30/92 be updated to refer to PPG 25 and reference made for the necessity of applicants to prepare flood risk assessments?

Does criteria A of the Policy allow for development in areas at risk from flooding where these are adequately protected? Is the Policy flexible enough to allow development to proceed where measures are taken?

Should paragraph 4.183 recognise that Oldbury on Severn is an area at risk from flooding?

Reasoning and conclusions

24.1 As I have stated in my consideration of Policy L17A I have some sympathy with Oldbury-on-Severn Parish Council’s concerns, but as Policy L17A recognises that whilst the use of SUDS is the government’s preferred option for surface water drainage, this may not be always practicable. Policy EP02 is clear that where development would lead to an increased risk of flooding that cannot be mitigated against, either by SUDS or by other forms of mitigation, development would not be allowed to proceed. Criterion D of Policy EP02 clearly states that consideration of this increased risk would apply to locations other than the immediate development area. I consider that adequate safeguards have been provided in the plan and the amendments sought in this respect therefore are unnecessary.

24.2 As regards the suitability of specific sites, my report should be read as a whole and it would not be appropriate for me to refer to the suitability of sites for housing in my discussion of objections relating to Policy EP02. Furthermore as I consider that the Policy provides sufficient protection from flooding for all areas of the district, it would be inappropriate for this Policy to make specific reference to particular sites.

24.3 Although I do not consider that it is necessary for the Policy to take a more rigorous stance on development in the flood plain, the plan needs to clarify the appropriateness of certain areas for development in the light of their risk from flooding. PPG 25 is clear that the effects of development in the flood plain should be very carefully considered, and a sequential approach to the location of development in areas at risk from flooding should be followed. Although the restrictive nature of Policy EP2 accords with this advice there is nothing in the Policy, or its supporting text that refers to the necessity to apply a sequential test in terms of assessing the suitability of locations for development. I consider that, together with my recommendation below concerning the necessity for flood risk assessment, the supporting text should be amended.

24.4 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the plan. The plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy EP02 as this policy relates specifically to the Flood Risk and Development. Future development at Severnside is addressed in other more relevant policies in the plan.

24.5 Whilst PPS 12 indicates that the areas to which specific policies apply should be illustrated on the Proposals Maps, as the requirements of Policy EP02 would not always correlate with the location of the illustrative flood plan, I consider that inclusion of this information on the proposal map may be misleading. I consider that the approach taken by the council in Figures 4.6 & 4.2, supported by the production of SPG on this matter would allow this information to be kept up to date more regularly. In this respect, the concerns about the identification of Oldbury on Severn as an area at risk from flooding, I find that the
approach taken by the Council in using SPG to identify specific areas at risk would address Mr Turner’s concerns and allow this information to be regularly updated.

24.6 The Environment Agency’s has expressed concerns over the plan's continued reference to Circular 30/92 and lack of reference in the Policy to the necessity for applicants to provide Flood Risk assessments. As PPG 25 replaces Circular 30/90 this reference should be removed from the plan. Furthermore given the contents of Paragraph 60 of PPG 25, the Policies supporting text should refer to the necessity of flood risk assessments.

24.7 As regards the flexibility of the Policy’s criteria, there is nothing unreasonable about criterion A as mitigation measures, either in terms of flood protection measures or measures to address run off, are addressed by the final paragraph of the Policy. For similar reasons criterion B is also acceptable.

Recommendation

24.8 I recommend that the local plan be modified

i) by the insertion of a new paragraph before Paragraph 4.182 to read:

“In assessing the potential effects of flooding on the location of development, the Council will apply a sequential approach, dependant upon the nature of the development and the level of risk from flooding in its proposed location. PPG 25 defines low, medium and high risk zones and sets out the types of development that would be appropriate in each zone. In medium and high risk zones the Council would expect that a flood risk assessment would be submitted along with any planning application.” and

ii) by the deletion of the reference to DoE Circular 30/92 “Development and Flood Risk” in the third sentence of paragraph 4.183.

25. Policy EP03 – Coastal Defences

Objection

410/031 Environment Agency EP03

Support

410/520 Environment Agency EP03

Issue

Should the Policy refer to minimum flood defence standards and also make reference to SSSIs or other nationally or intentionally designated sites?

Reasoning and conclusions

25.1 Policy EP04 has been amended by the Revised Deposit changes so that it meets with the Environmental Agency’s concern regarding minimum flood defence. As the Policy clearly refers to the Severn Estuary SPA, which includes coastal SSSIs and other designated sites, I consider that there is no necessity to include a specific reference to other designations in the Policy.

Recommendation

25.2 I recommend that no modification be made to the local plan

Objections

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Issues

Should the Policy, rather than its supporting text, list those uses that are considered to be noise sensitive? Should the supporting text explain why some of these uses differ from those set out in PPG 24?

Should the plan contain a Policy for the location of noise generating development?

Should the Policy refer to the existence of “Severnside permissions” referred to in paragraphs 2.26 and 2.27 of the local plan?

Are the requirements of the Policy unduly onerous as it fails to take the possibility of mitigation into account?

Reasoning and conclusions

26.1 Given that the plan should be read as a whole, it is not necessary for the Policy to list noise sensitive uses when these are clearly listed in the supporting text to the Policy. The council has suggested that some other uses other than those found in PPG 24 may be sensitive to noise, but this is clearly a non exhaustive list included for illustrative purposes, and the uses given are types of development that may obviously be sensitive to noise, such as libraries. I do not consider that the council should have to justify this list further.

26.2 There is no necessity for the plan to contain a Policy on the location of noise generating development. Whilst PPG 24 does suggest that in some instances such a Policy would be beneficial, it does not require that such a Policy is included in all development plans. In this instance I consider that the Revised Deposit version of Policy EP01, which specifically lists noise as a form of environmental pollution, provides sufficient protection from noise generating development.

26.3 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the plan. The plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy EP04 as this policy relates specifically to noise sensitive development. Future development at Severnside is addressed in other more relevant policies in the plan.

26.4 Policy EP04 employs a test of “unacceptable disturbance” which would allow the effects of mitigation to be taken into account as part of an overall assessment of the effects of the development. This would allow the effect of careful layout and design to be taken into consideration when an application has been made. No change to the Policy is necessary in response to 396/003.

Recommendation

26.5 I recommend that no modification be made to the local plan.
27. Policy EP05 and Paragraphs 4.198-4.203 – Renewable energy installations

Objections

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<td>431/505</td>
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Issues

Would it be more accurate for paragraph 4.198 to refer to “the burning of fossil fuels” as opposed to “energy production?”

Should paragraph 4.200 refer to Renewable Energy Assessment and Targets for the South West 2001 to support its conclusions?

Should paragraph 4.198 and 4.200 refer to the regional target for renewable energy production?

Reasoning and conclusions

27.1 These objections all concern the wording of the Policy’s supporting text and for reasons of brevity, I consider them together. The council has accepted the objectors’ concerns regarding the amount of explanation contained in the text and the level of referencing to both national and regional policy either as Revised Deposit changes or as further Proposed Changes following the Revised Deposit period. I consider that these modifications are reasonable since they help to clarify the plan and bring it up to date. I note that this section of the Plan refers to PPG22. This has been superseded by PPS22 and the Plan should be updated accordingly.

Recommendation

27.2 I recommend that the local plan be modified

i) in accordance with PC32, PC33 and PC34, and

ii) by replacing the reference to PPG22 with PPS22.


Objections

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Issues

Should paragraph 4.205 be expanded to refer to the wider definition of protection offered under Part IIA of the EPA 1990?
Should paragraph 4.206 recognise that Part IIa of the EPA 1990 and Section 78 of the EPA refer to the same legislation for contaminated land? Should the paragraph be reworded?

Is the wording of paragraph 4.213 misleading? Should the paragraph be reworded?

Reasoning and conclusions

28.1 These objections have been addressed by changes to the Revised Deposit Plan. Whilst the Environment Agency did not seek the deletion of Paragraph 4.205, given subsequent changes to the rest of the Policy’s supporting text, I consider this paragraph is superfluous.

Recommendation

28.2 I recommend that no modification be made to the local plan.

29 Policy EP08 – Safety hazards

Objections

410/035 Environment Agency EP08

Support

34/001 Health and Safety Executive EP08
410/521 Environment Agency EP08

Issue

Is it necessary to change the Policy’s wording so it refers to “the environment” rather than “wildlife”?

Reasoning and conclusions

29.1 The Revised Deposit Plan has provided the opportunity to meet this objection. I consider this matter to be resolved and I shall not comment further.

Recommendation

29.2 I recommend that no modification be made to the local plan.


Objections

219/002 Mr S Moran EP09
301/014 Redrow Homes (South West) EP09
347/014 Redrow Commercial Developments Ltd EP09

Support

34/002 Health and Safety Executive EP09
51/002 Bristol Rugby Club Ltd EP09
322/012 Wilson Connolly EP09

Issues

Should the Policy restrict large scale residential development on Severnside for safety reasons?

Should the Policy refer to the existence of “Severnside permissions” referred to in paragraphs 2.26 and 2.27 of the Local Plan
Reasoning and conclusions

30.1 I have dealt with Mr Moran’s objections to the development of land in Severnside for housing in the Strategy and Housing Chapters of the Plan. Policy EP09 provides sufficient guidance so that development in unsafe locations is resisted.

30.2 As I have stated elsewhere in this report, future development at Severnside is addressed in the Strategy, Economy and Housing Chapters of the plan. The plan should be read as a whole and it would not be appropriate to refer to such permissions in Policy EP09 as this policy relates specifically to the development in the vicinity of safety hazards. Future development at Severnside is addressed in other more relevant policies in the plan.

Recommendation

30.3 I recommend that no modification be made to the local plan.

31. Policy Omission

Objection

203/021 Frampton Cotterell Parish Council Policy Omission

Issue

Should the Plan contain an additional Policy concerning the adoption of sewers?

Reasoning and conclusions

31.1 I do not consider that it is necessary for the plan to contain a Policy on the adoption of sewers as this is not a spatial planning issue and it lies outside the remit of the plan.

Recommendation

31.2 I recommend that no modification be made to the local plan.
CHAPTER 5 - GREEN BELT

1. Paragraphs 5.05 and 5.06 - Introduction - The Scale and Extent of the Green Belt

Objections

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These objections relate to site specific issues that are covered elsewhere in my report.

2. Policy GB01 and Paragraphs 5.08-5.15 – Development within the green belt

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Issues

Should the green belt boundaries be changed from that previously adopted?

Does the criteria based policy properly reflect national guidance?
Reasoning and conclusions

2.1 The supporting text at paragraph 5.6 indicates that it is not proposed to alter the inner or outer boundaries of the green belt from that currently defined in the previously adopted local plans, with the exception of land at Severn Beach. That land is subject of policy GB3 and is considered below. In addition, policy GB2 seeks to correct what the council sees as an anomaly at Abbots Road, Hanham, whilst policy GB4 maintains safeguarded land at Harry stoke and GB5 identifies a Major Developed Site at Hortham Hospital.

2.2 In general terms the council is right that this local plan does not seek to undertake a fundamental redrawing of the green belt in the district. Paragraph 2.7 of PPG2 indicates that where existing local plans are being revised and updated existing green belt boundaries should not be changed unless alterations to the structure plan have been approved or other exceptional circumstances exist which necessitate such revision. The JRSP's locational strategy's concentration of development is "in accord with green belt policies". It states at paragraph 2.103 that it does not alter the existing extent of the green belt (except in certain limited areas). It goes on to say that "it will be for the next structure plan review to consider the need to revise the general extent of the green belt, as proposed in RPG10 (paragraph 3.11), in order to consider sustainable development opportunities over the longer term."

2.3 It is clear that the need to ensure that future patterns of development are sustainable means that there should be a review of green belt boundaries. The tightness of the existing green belt around the main urban area, its overall width, its relationship to the main transport corridors, to the outlying towns, such as Yate and the future role of Severnside, are all factors that will have to be taken on board in undertaking a review of the green belt. However, that is not for me to consider. It is absolutely clear that a major review is not for this local plan, but is for a sub regional spatial strategy, which in turn will inform the LDF process, which is taking over from the existing structure/local plan system. That will be when more strategic thinking can be given to the adoption of the most sustainable, long term, pattern of development on this side of Bristol. In the meantime, I see no reason for this chapter of the local plan to make specific reference to existing planning permissions in the Severnside area.

2.4 Thus, I do not consider that major changes can or should be made to the green belt at this stage. I do not support the incremental, piecemeal release of peripheral green belt sites. That, however, does not preclude changes being made where there are exceptional circumstances or where there are obvious anomalies that should be corrected. Such latter changes are unlikely to be more than minor in scale.

2.5 I appreciate that this means that important strategic decisions, such as the relationship of Yate to the green belt, will have to be held over for future consideration and that as a result development decisions across the district will have to be made within the context of a green belt whose boundaries were drawn up some years ago. This sets out a robust and fairly rigid framework within which decisions will have to be made. It will also leave a number of green belt areas open to particularly strong pressures. To a degree this is recognised by the change proposed, via PC132, which refers to cumulative impact of development. I am content with that addition, but do not consider that the plan should go further in terms of drawing attention to any particular area that is under strong pressure. Nor would it be appropriate to try and develop a hierarchy of controls applying to different parts of the green belt. Policy GB1 sets out a firm set of criteria and it will be for the council to ensure that it applies its approach firmly to protect the openness of the whole of the green belt across the district.

2.6 In my view the wording of policy GB1 closely reflects the guidance in PPG2. I understand the concerns that some flexibility should be given to rural areas so that viable commercial enterprises can flourish and that the interests of those that work and live in those areas are respected. However, local plan policies should not introduce categories of development that
would be appropriate in the green belt beyond those set out in national guidance. I do not, therefore, support those objectors who are seeking to enlarge the categories of development permitted by the policy, nor those that are seeking a greater flexibility for those parts of the green belt that may be considered to be more sustainable locations for development than the more remote areas. To do so could seriously undermine the purposes of the green belt and the need to keep land permanently open.

2.7 I am content with the way that the plan deals with infilling in green belt settlements. The areas where infilling may take place are defined by settlement boundaries shown on the Proposals Maps and infilling is defined in paragraph 5.11 as amended by PC35. This provides some reasonable scope for further development within green belt settlements. It would be contrary to the thrust of national guidance to open up the possibility of new dwellings within existing curtilages in those smaller rural villages and hamlets that do not have defined settlement boundaries.

2.8 I do not support any changes to criterion A2, essential facilities for outdoor sport and recreation. The wording reflects that of PPG2. To add to it references to accommodation or to specific sites, could, unacceptably, open up the possibility of a scale of development which could seriously impinge on the aim of preserving the openness of the green belt. The criterion as drafted provides a proper and reasonable test of what would be acceptable.

2.9 I am also content with criterion A4, which again reflects PPG2 guidance. It is inevitable that a subjective judgement will have to be made in the case of extensions, alterations and replacement dwellings. If a quantitative guide were to be given it could only be a guide, rather than a hard and fast figure, and the council would still be in a position of having to make a subjective judgement based upon the particular circumstances of each case. I am also content with the final sentence of the policy, which seeks to protect the visual amenity of the green belt from adverse impact. Again, this reflects PPG2 advice.

2.10 I note the views expressed about the need for special needs accommodation for the elderly. However, I do not consider that the level of local need for this form of accommodation can justify introducing this as a special category of development that may be thought of as being appropriate in the green belt. That would run contrary to clear and robust national guidance. Rather, it will be for the circumstances of each case to be considered to determine whether the very special circumstances exist to allow specific proposals. I do not consider that it would be possible for the plan to offer any clearer guidance as to what may provide such very special circumstances in the case of specialist elderly persons accommodation.

2.11 The plan needs to be read as a whole. Affordable housing exception sites are considered under policy H7. Bearing in mind national guidance it would not be appropriate to include this category within the list of those forms of development acceptable in the green belt.

Recommendation

2.12 I recommend that the local plan be modified in accordance with PC35 and PC132.

A number of objections relate to site specific changes to the green belt boundary. Most of these are linked to other objections which go on to seek the allocation of the land in question for a particular purpose. Where this is the case, I report on the objections in a single item, within this chapter of my report and comment only briefly in the other relevant chapter.
Each of the following items involving potential changes to the green belt boundary should be read in the context of my conclusions in the above item. Most notably, I have concluded that it is not for this plan to review green belt boundaries. That will be for a future occasion. In the context of paragraph 2.7 of PPG2, there are no structure plan alterations that require changes to the green belt in the district. Changes may only be made where there are exceptional circumstances which necessitate such revision. I, also, support the making of very small, minor changes where these may correct an obvious anomaly.

In the housing chapter I have identified a substantial shortfall in the housing land supply which the plan must make good. Having considered the sites advanced by objectors I am fully satisfied that this housing land shortfall can be made up without having to encroach upon green belt land. I thus reject those changes to the green belt that have been advanced by objectors on the simple basis of a need for more housing land. I fully accept that some of these sites might otherwise, had they not been in the green belt, be considered to represent a reasonably sustainable location for development, close to services and employment areas where reliance on the car could be minimised. However, in advance of a future strategic review of green belts, I do not find that there is a need of such weight as to justify rolling back green belt boundaries to achieve suitable housing sites.

3. Policy GB01 (Boundary) Between Almondsbury & M5

Objection

290/001 Almondsbury Securities GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify the exclusion of this site from the green belt.

Reasoning and conclusions

3.1 This objection and associated ones made to housing policy H2 seek the removal of this site from the green belt, its inclusion within the settlement boundary of the village and its identification as being suitable for development for housing and related purposes. This land lies within the western quadrant formed by the junction of the M4 and M5 and is bounded on the west by the village of Almondsbury. It forms part of the much larger expanse of green belt north east of the M4 and north west of the M5. The village of Almondsbury is washed over by green belt.

3.2 The southern part of the site contains sports facilities, with the bulk of the land being open, agricultural fields. As well as being crossed by public footpaths, the site is prominent in views from sections of the adjoining motorway network. Although views across the site are in the context of the busy motorways and their associated gantries, the main impression is of a number of open fields on rising land. In my view there is no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in maintaining the separation between Bradley Stoke and the village, safeguarding countryside and assisting in urban regeneration. The site has been in the green belt since its inception in 1968. The essential characteristic of green belts is their permanence. I find no exceptional circumstances here that warrant a change to this longstanding area of green belt.

3.3 To take this site out of the green belt and allow for the expansion of Almondsbury would cause substantial harm to an area of green belt in this important and prominent location. I note the various advantages that could accrue to the village put forward by the objector. These include the provision of a bypass to the A38 around Almondsbury. The village does not
have a clear focus on the A38 and whilst some residents would benefit from a bypass, I do not find that great weight should be given to this suggestion. Neither this matter nor the other benefits advanced constitute exceptional circumstances that might justify the removal of this land from the green belt and its subsequent development for housing or other purposes. Whilst the A38 could form a clear, defensible boundary for the green belt, there is no justification for moving the boundary to that point.

3.4 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. Almondsbury is a small village with limited facilities. It has no shops. It is likely that if new housing were established here then for most trips residents would be reliant on the car. The site is in close proximity to Bradley Stoke and major employment areas. However, because of the barrier created by the motorway and the unattractiveness of any underpass it is likely that few people would chose to go to the main urban area on foot or by cycle. That is also a significant disadvantage to the locating of a park and ride on this site, on what is the wrong side of junction 16. Although the site is close to the PUA, it is not a sustainable location for development, and certainly not for the scale (potentially 700 plus houses) that is suggested here.

3.5 Development of this land would undoubtedly threaten the separate identity of Almondsbury. The particular circumstances advanced by the objector do not constitute exceptional circumstances as required by PPG2. There are, therefore, compelling green belt and other arguments against supporting the objector.

Recommendation

3.6 I recommend that no modification be made to the local plan.

4. Policy GB01 (Boundary) Vattingstone Lane/Strode Common, Alveston

Objection

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<td>390/006</td>
<td>Mr J F B Gunnery</td>
<td>GB01 (Boundary)</td>
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</tbody>
</table>

Issues

Whether Alveston should be washed over by the green belt.

Whether exceptional circumstances exist to justify excluding a site to the west of the village from the green belt, with a view to its residential development

Reasoning and conclusions

4.1 The objector seeks the insetting of the village within the green belt and also the opportunity to expand the village by the inclusion within it of a 12 hectare site to the west of the village.

4.2 Alveston village was included as a washed over settlement within the green belt in the 1991 Rural Areas local plan. That followed a period when it was treated as an inset village. The decision to wash over the village, taken through that local plan process, was made by the council because the major opportunities for development had already been taken up and that only limited infilling was now appropriate. I see no reason to disagree with the council's assessment. The village is extensively built-up. There are few if any opportunities for development within the village. Given that opportunities for development within the village are limited, it is logical that the plan washes over the village.
4.3 I do not agree that the village should be given the opportunity to expand. The village is surrounded by the green belt which extends from the edge of Bristol up to Thornbury. The green belt here performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, safeguarding countryside and assisting in urban regeneration. The essential characteristic of green belts is their permanence. I find no exceptional circumstances here that warrant a change to this longstanding area of green belt.

4.4 To take this site out of the green belt and allow for the expansion of Alveston would cause substantial harm to an area of green belt in this important and prominent location. The site is currently open and forms part of a larger area of countryside. To develop here would harm the openness of the green belt. I have before me no matters that might constitute exceptional circumstances to justify the removal of this land from the green belt and its subsequent development for housing or other purposes.

4.5 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. Likewise, in my opinion, it would be contrary to national guidance to consider peripheral village sites as being suitable or appropriate for development where they lie within the green belt. The sequential approach to site selection has to be made having regard to the green belt. Alveston is a modest sized village with a reasonable but limited range of facilities. Whilst an increased resident population may improve the vitality and viability of local services, it is likely that if new housing were established here then for most services and employment residents would still be reliant on the car. Given the proximity of Thornbury and of the Bristol conurbation I do not consider that this is a sustainable location for new development. I conclude that there are compelling green belt arguments against supporting the objector.

Recommendation

4.6 I recommend that no modification be made to the local plan.

5. Policy GB01 (Boundary) Bath Road, Bridgeyate

Objection

Bendrey Brothers GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify the exclusion of this site from the green belt.

Reasoning and conclusions

5.1 This objection and associated ones made to housing policies H1 and H2 seek the removal of this site from the green belt, its inclusion within the settlement boundary and its identification for residential development. This land was first included within the green belt in 1968. It forms part of a much larger area of green belt to the east of the Bristol conurbation.

5.2 In my view there is no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, safeguarding countryside and assisting in urban regeneration. In my view the loss of part of this extensive area of green belt could undermine the functioning of the green belt in this area. The essential characteristic of green belts is their permanence.
5.3 The change sought relates to a sawmill and two fields, part of a much larger area of open agricultural land. Although there is some sporadic development within the green belt, to the east of Bath Road, the overriding character is a rural one, with open land providing a setting to this edge of Bristol. This site, although partially built on, forms part of the wider rural scene and is an integral part of the green belt east of Bath Road. To take this site out of the green belt so as to facilitate development here would cause substantial harm to this area of green belt.

5.4 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. That part of the site is previously developed, that it is serviced and close to the main built-up area and its services does not constitute exceptional circumstances here that warrant a change to this longstanding area of green belt.

Recommendation

5.5 I recommend that no modification be made to the local plan.

6. Policy GB01 (Boundary) Griffin Farm, Bromley Heath

Objections

<table>
<thead>
<tr>
<th>Objection</th>
<th>Name</th>
<th>Policy</th>
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<tbody>
<tr>
<td>394/001</td>
<td>Mrs Churchill</td>
<td>GB01 (Boundary)</td>
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<tr>
<td>395/001</td>
<td>Mrs H Bailey-Scudamore</td>
<td>GB01 (Boundary)</td>
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</tbody>
</table>

Issue

Should this land be excluded from the green belt and allocated for housing?

Reasoning and conclusions

6.1 These objections and associated ones made to housing policy H1 seek the removal of this site from the green belt and its identification as being suitable for housing development. This land forms a long, thin slither of land, being part of a larger area of green belt between the M4 and the Avon Ring Road, that extends down the M32 corridor towards the city centre.

6.2 In my view there is no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in maintaining the separate identities of Bristol and Winterborne, safeguarding countryside and in a small way assisting in urban regeneration. In my view the loss of part of this wedge of green belt south of the M4 would seriously harm its very important contribution to the open character and appearance on this edge of the city. The essential characteristic of green belts is their permanence. I find no exceptional circumstances here that warrant a change to this longstanding area of green belt.

6.3 The change sought relates to an area of agricultural land that provides a green edge to the Ring Road and separates the built-up area from the M4. It forms part of the wider rural setting along this edge of Bristol and is an integral part of the green belt north of the Ring Road. To take this site out of the green belt so as to facilitate development here would cause substantial harm to an area of green belt in this important, prominent and sensitive location.

6.4 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt
boundaries to facilitate new housing development. There are, therefore compelling green belt arguments against supporting the objectors.

**Recommendation**

6.5 I recommend that no modification be made to the local plan.

---

7. Policy GB01 (Boundary) Old Bromley Heath Road

**Objection**

452/001 Mr & Mrs N W R Scudamore GB01 (Boundary)

**Issue**

Should this land be taken out of the green belt and allocated for housing?

**Reasoning and conclusions**

7.1 This 4.5 hectare site forms part of the land considered in the previous item. For the reasons I give there I do not consider that there are exceptional circumstances to justify drawing back the green belt boundary from this site and/or allocating this site for housing.

**Recommendation**

7.2 I recommend that no modification be made to the local plan.

---

8. Policy GB01 (Boundary) Land Adjacent Lamb & Flag, Cribbs Causeway

**Objection**

398/001 East Lake Developments Ltd GB01 (Boundary)

*This site is considered in chapter 8a of my report, at item 16*

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9. Policy GB01 (Boundary) Land Between M5 & A4018 Cribbs Causeway

**Objections**

423/002 N G Associates GB01 (Boundary)

23/002 Mr A Ripley GB01 (Boundary)

**Issues**

Whether this local plan should have reviewed the extent of the green belt in this area.

Whether there are exceptional circumstances that justify the exclusion of this land from the green belt.

**Reasoning and conclusions**

9.1 This objection seeks the removal of this site from the green belt and its identification for mixed-use development. I have concluded in section 2 above that it is not for this plan to
review the extent and boundaries of the green belt. I fully recognise the need for a review, but this is a matter that needs to be carried out at a strategic level. That reflects both regional and strategic guidance. That this site was not considered at the strategic level as part of the structure plan process is noted. The objection falls to be considered as part of the local plan process, in the context of PPG2 and the strategic position as set out in the structure plan. I note the comments made by the objector in respect of the opening paragraphs of chapter 5 of the plan, but see no reason to recommend changes to them.

9.2 This is a substantial area of land. It lies between the M5 and the A4018 and comprises, apart from a few properties, open fields and sports pitches. South of the M5, this wedge of green belt helps to retain a sense of openness between the motorway and the built development at Cribbs Causeway. In my view the loss of this extensive wedge of green belt would harm the openness of the area. The essential characteristic of green belts is their permanence. I have no exceptional circumstances before me to meet the test of PPG2 and so justify releasing the land from the green belt.

9.3 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. Nor do I consider that there are other development requirements that necessitate the drawing back of green belt boundaries. That part of the site is previously developed, and is close to the main built-up area and its services does not constitute exceptional circumstances here that warrant a change to this longstanding area of green belt.

**Recommendation**

9.4 I recommend that no modification be made to the local plan.

**10. Policy GB01 (Boundary) Land Between Cribbs Causeway & Brentry, Filton Airfield**

**Objection**

435/005 Bristol City Council GB01 (Boundary)

**Issue**

Should the green belt boundary be redrawn to encompass the open land east of Wyck Beck Road?

**Reasoning and conclusions**

10.1 This objection relates to the area of open land between the Filton railway line and the Filton Airfield, east of Wyck Beck Road. Part of this site has been subject of an objection seeking its development for employment purposes. I consider that objection in chapter 7 of my report.

10.2 Policy 16 of the JRSP indicates that the inner boundary of the green belt should follow the limits of existing development or that already committed. The revised deposit plan shows the green belt boundary drawn along Cribbs Causeway and Wyck Beck Road, with all the area to the east, including this large area of open land excluded from it. It is for the local plan to apply the JRSP policies to the particular circumstances in its area. Here, the council has chosen to use the main road system as providing the divide between green belt and non-green belt land. That line is clearly defined on the ground and in my view represents a reasonable boundary.
10.3 This undeveloped land forms a major re-entrant into the built-up area. It is physically linked to the existing green belt only for a short length of Wyck Beck Road, where that road rises to pass over the railway line. Otherwise, development along Cribbs Causeway and Wyck Beck Road separates the open land to the west and this land. I note the comparison made by the objector between this land and that around the M32. In my view they are not directly comparable. The wedge of green belt running down the M32 flows naturally from the green belt area north of the M4. Here, the relationship with the wider green belt is physically more tenuous. The obvious physical and visual linkage is much less. In my opinion the council reasonably drew the boundary along the main road system. In drawing the boundary as it has I do not consider that the local plan has misapplied the guidance in policy 16 of the JRSP.

10.4 Whilst this land may in the past have represented a break between the heavily built-up area south of the railway and more open land to the north, more recent development in the Cribbs Causeway area has decreased the sense of this firm divide. As a result, the land is to be seen much more in the context of lying within the urban area, than being at its fringes. It is not unreasonable that in strategic terms it be treated as being within the conurbation rather than lying outside it. I do not consider that the guidance in policy 16 of the JRSP should mean that the green belt boundary should in this instance exactly follow the edge of the built-up area, creating a loop of protected land almost completely surrounded by built development.

10.5 The area to the north of this site has seen much development in recent years with the effect of almost enclosing this wedge of open land, between this recent development and the old established edge of the city. I accept that this land does now provide an area of open ground that still maintains the break between the residential areas south of the railway line and the newer development around Cribbs Causeway. In terms of the purposes of the green belt I am not convinced that a designation would be justified on the basis of checking unrestricted sprawl. Its development would not extend the city out into the countryside, but rather would result in a more complete physical linkage of these areas. Any role that this area has in terms of a natural break can be protected by means other than the green belt. Whether that is justified can best be determined in the context of a strategic review of needs in this area.

10.6 I acknowledge that the land is mainly open fields and that its protection could safeguard encroachment onto them. I also accept that protection of this land could assist in the regeneration of urban areas. I note too the recreational and nature conservation interest in the site. However, I do not find that these matters cumulatively provide the exceptional circumstances here to justify the redrawing of the green belt boundary to include this land. Nor do I find that the change in boundaries is necessary to be in compliance with the JRSP.

**Recommendation**

10.7 I recommend that no modification be made to the local plan.

### 11. Policy GB01 (Boundary) Park Farm/Woodlands Farm, Frampton Cotterell

**Objections**

- 430/027 Cala Homes (South) Ltd GB01 (Boundary)
- 438/026 Mr L Smith GB01 (Boundary)

*This site is considered under the omission sites, in item 30 of chapter 8A*
12. Policy GB01 (Boundary) South of Parsonage Bridge, Frampton Cotterell

Objections

123/001 Mr P A Fitzmaurice GB01 (Boundary)
124/001 Mr F M Holman GB01 (Boundary)
125/001 Ms J Wright GB01 (Boundary)
126/001 Mrs B M Holman GB01 (Boundary)
127/001 Mr N Wright GB01 (Boundary)
192/001 Mr D R Pope GB01 (Boundary)
195/001 Mrs M D Pope GB01 (Boundary)

Issue

Are there exceptional circumstances to justify the exclusion of this land from the green belt?

Reasoning and conclusions

12.1 These objections seek the removal of this site from the green belt with a future reassessment of the land for development. I have concluded in section 2 above that it is not for this plan to review the extent and boundaries of the green belt. I fully recognise the need for a review, but this is a matter that needs to be carried out at a strategic level. That reflects both regional and strategic guidance. These objections fall to be considered as part of the local plan process, in the context of PPG2 and the strategic position as set out in the structure plan.

12.2 This is a substantial area of land on the edge of Frampton Cotterell. I accept that it lies within the broad "horseshoe" formed by Frampton Cotterell, Winterbourne and Coalpit Heath. However, it is open in character and in my view performs a number of green belt purposes, not least checking the unrestricted sprawl of large built-up areas and safeguarding the countryside from encroachment. The essential characteristic of green belts is their permanence. None of the matters raised by the objectors can be said to constitute exceptional circumstances to meet the test of PPG2 and so justify releasing the land from the green belt.

12.3 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. I have also found that Frampton Cotterell is not an appropriate location to accommodate further development by way of allocations or the extension of the settlement boundary. In conclusion I find no exceptional circumstances here that warrant a change to this area of green belt.

Recommendation

12.4 I recommend that no modification be made to the local plan.

13. Policy GB01 (Boundary) Hambrook & Hambrook Farm

Objection

26/003 Mr and Mrs J J Baylis GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify the exclusion of this site from the green belt.
Reasoning and conclusions

13.1 This objection and associated ones made to housing policies H1 and H2 seek the removal of this site from the green belt, its inclusion within the settlement boundary and its identification for residential development. This land was first included within the green belt in 1968. It forms part of a larger area of green belt between the M4 and the Avon Ring Road, that extends down the M32 corridor towards the city centre.

13.2 In my view there is no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in maintaining the separate identities of Bristol and Winterborne, safeguarding countryside and in a small way assisting in urban regeneration. In my view the loss of part of this wedge of green belt south of the M4 would seriously harm its very important contribution to the open character and appearance of this major entry into the city. The essential characteristic of green belts is their permanence. I find no exceptional circumstances here that warrant a change to this longstanding area of green belt.

13.3 The change sought relates to a small area of developed land with farm buildings. Although built on, the site forms part of the wider rural scene and is an integral part of the green belt north of the Ring Road. To take this site out of the green belt, or allow for the exclusion of a wider area of Hambrook, so as to facilitate development here would cause substantial harm to an area of green belt in this important, prominent and sensitive location.

13.4 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. There are, therefore compelling green belt arguments against supporting the objector.

Recommendation

13.5 I recommend that no modification be made to the local plan.

14. Policy GB01 (Boundary) Hambrook & Mirehouses, Hambrook

Objections

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<thead>
<tr>
<th>Ref</th>
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<tr>
<td>189/002</td>
<td>Walter Raph Butt and Roystan Hewetson (Trustees)</td>
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<tr>
<td>189/003</td>
<td>Walter Raph Butt and Roystan Hewetson (Trustees)</td>
</tr>
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Issue

Whether there are exceptional circumstances that justify the exclusion of this site from the green belt.

Reasoning and conclusions

14.1 This objection and associated ones made to housing policy H1 seek the removal of this site and the wider settlement of Hambrook from the green belt and its identification as being suitable for development. This land forms part of a larger area of green belt between the M4 and the Avon Ring Road, that extends down the M32 corridor towards the city centre.

14.2 In my view there is no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in maintaining the separate identities of Bristol and Winterborne, safeguarding countryside and in a small way assisting in urban regeneration. In my view the loss of part of this wedge of green belt south of the M4 would seriously harm its very important contribution to the open character and
appearance of this major entry into the city. The essential characteristic of green belts is their permanence. I find no exceptional circumstances here that warrant a change to this longstanding area of green belt.

14.3 The change sought relates to an area of agricultural land. The site forms part of the wider rural scene and is an integral part of the green belt north of the Ring Road. To take this site out of the green belt, or allow for the exclusion of a wider area of Hambrook, so as to facilitate development here would cause substantial harm to an area of green belt in this important, prominent and sensitive location. I note the problems referred to about the viability of using this land. However, that does not constitute exceptional circumstances that might justify its removal from the green belt and its subsequent development for housing or other purposes.

14.4 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. There are, therefore compelling green belt arguments against supporting the objector.

Recommendation

14.5 I recommend that no modification be made to the local plan.

15. Policy GB01 (Boundary) West of M32/South of M4/Hambrook

Objection

4/001 Mr Petros Birakos GB01 (Boundary)

Issue

Should the green belt boundary be redrawn to follow the line of the M32 and M4?

Reasoning and conclusions

15.1 The objector is seeking a substantial redrawing of the green belt boundary, pulling it back from the existing edge of development to the line of the motorways. To do so would free up a major area of land for development. Any such major change to the green belt can only be made in the context of a strategic review of the green belt. Currently the open land along this part of the M4 and that running down the M32 provides a very important setting for this major entrance into the city. The land clearly performs a strong green belt function. I note that the objector refers to proposals for a large leisure complex in this location. However, I do not consider that this can be thought of as providing exceptional circumstances that might justify such a significant change to the green belt here.

Recommendation

15.2 I recommend that no modification be made to the local plan.

16. Policy GB01 (Boundary) Abbots Road/Court Farm Road, Hanham

Objections

85/002 Mr C Roberts GB01 (Boundary)
313/003 Matchmove Ltd GB01 (Boundary)
These objections are considered under policy GB2 below.

17. Policy GB01 (Boundary) Hanham Business Park, Hanham

Objection

204/004 Logersham Developments

This objection is considered under policy E3, in item 24 of chapter 7 of my report.

18. Policy GB01 (Boundary) Pomphey Hill, Mangotsfield

Policy GB01 (Boundary) Rodway Hill Road, Mangotsfield

Objections

199/001 Mr J Brown
93/001 Bryant Homes

Support

83/001 Mrs Fry

Issues

Should the green belt boundary be drawn back from some or all of the area west of the Ring Road?

Should land here be safeguarded or identified for development?

Reasoning and conclusions

18.1 Mr Brown seeks the exclusion from the green belt of all the land west of the Avon Ring Road and, in associated objections, the allocation of a small area of land at Pomphey Hill for housing. Bryant Homes seek the exclusion of part of this broad area, at Rodway Hill, from the green belt and, in associated objections, its safeguarding or allocation for housing.

18.2 The objections relate to all or part of the area of green belt contained by the Ring Road and the existing edge of the built-up area of Mangotsfield/Staple Hill. Much of this land is in leisure and recreation use and includes Mangotsfield School. Originally excluded from the green belt designation in 1968, this land was taken into the green belt by the Kingswood local plan in 1991.

18.3 Although the land is physically cut off from the main body of green belt land to the east by the Ring Road, I have no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in maintaining the separate identities of Bristol and Shortwood and assisting in urban regeneration. This is a large area and one that I would expect to be considered at a strategic level before a decision could be made to significantly draw back the green belt boundary to the Ring Road. As I have explained earlier in this chapter I do not consider that the time is right to make strategic changes to the green belt. A major review of the green belt will be undertaken in the next round of plans and it is at that stage that decisions would be made on issues such as this.
Given the pending review of green belts I do not consider that this is an appropriate time to introduce the question of safeguarding all or any part of the area.

18.4 As regards the specific sites advanced by the objectors, it would be necessary to show that exceptional circumstances exist to justify a change in the green belt. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. I fully appreciate that aside of the green belt designation these sites, on the periphery of the built-up area could be considered as being reasonably sustainable, with good access to the services, facilities and jobs within the urban area. However, this does not constitute exceptional circumstances. I do not support an approach of incremental release of peripheral sites from the green belt. It is for the strategic planning process to take a measured view and to weigh up greenbelt considerations against arguments of sustainable patterns of development.

18.5 The Bryant Homes site adjacent to Rodway Hill Road is bounded by the school and sports pitches. It is open in character and affords views across to the east. Although separated from other agricultural land, it continues to perform a green belt function. Its location and surroundings do not constitute exceptional circumstances to provide for its removal from the green belt. Likewise, the Pomphrey Hill site is open and is bounded by recreational facilities. It too performs a green belt function and again there are no exceptional circumstances here to justify removing the site from the green belt.

18.6 There are, therefore compelling green belt arguments against supporting the objectors.

**Recommendation**

18.7 I recommend that no modification be made to the local plan.

19. **Policy GB01 (Boundary) West End, Marshfield**

**Objection**

293/001 Mr G H England GB01 (Boundary)

*This objection is considered under policy E3 in item 27 of chapter 7 of my report.*

20. **Policy GB01 (Boundary) Kings Lane, Pucklechurch**

**Objection**

91/001 Mr A Davison GB01 (Boundary)

**Issue**

Should this site be excluded from the green belt and included within the settlement boundary?

**Reasoning and conclusions**

20.1 This site lies within the green belt at the western fringe of the village. A house has recently been completed on part of the land, with the remainder being open and containing some substantial trees and shrubs. The site is largely surrounded by a high stone wall. Despite the new house and the high wall it is my view that the site contributes to the rural character of Kings Lane. In this respect I agree with the assessment made by the Inspector in 2000 in his decision letter. In my opinion the council has reasonably drawn the settlement
and green belt boundaries to reflect the change in appearance and character between the more built-up areas to the north and east and the more open, looser development on the objection site and to its west and south.

20.2 There is no strategic imperative to extend the boundaries of the village to accommodate additional development. In my view the objection site contributes to the more open character of Kings Lane and to the green belt. I find there are no exceptional circumstances to justify the redrawing of the green belt boundary to exclude this land.

Recommendation

20.3 I recommend that no modification be made to the local plan.

21. Policy GB01 (Boundary) South Goose Acre, Siston Lane, Siston

Objection

357/001 Mr R J Bendry GB01 (Boundary)

Issue
Whether infill development should be provided for on this site.

Reasoning and conclusions

21.1 This small paddock lies within open countryside within the green belt. It is in an isolated position remote from the nearest village. There is scattered development along Siston Lane, with sporadic frontage development interspersed with fields. The objector is asking that the area should be "washed over" to allow for an infill development. This request misunderstands the position as set out in the local plan. Infill development is only allowed, by policy GB1, within existing villages washed over by the green belt. For development to be considered appropriate here it would be necessary to establish a settlement boundary around the group of properties running along Siston Lane.

21.2 In my view the local plan rightly does not identify any settlement boundary around this loosely spread housing. This area is rural in character. Development is sporadic, spread out along the road. There is no focus, nor any services or facilities for residents. There is a property to either side of the objection site, but that does not justify filling the gap in-between. To do so would unacceptably consolidate development in conflict with the most important attribute of green belts: their openness. It would also be contrary to those policies which seek to protect the countryside from unnecessary development.

Recommendation

21.3 I recommend that no modification be made to the local plan.

22. Policy GB01 (Boundary) Adjacent to Harry Stoke Safeguarded Land, Stoke Gifford

Policy GB01 (Boundary) Hambrook Lane, Stoke Gifford

Objections

343/004 Hallam Land Management Ltd GB01 (Boundary)
Issue

Whether there are exceptional circumstances that justify the release of land from the green belt.

Reasoning and conclusions

22.1 These objections overlap and are dealt with here. The objection by Mr Mason seeks the inclusion of the Hambrook Lane properties within the settlement boundary, taking them out of the green belt. Mr and Mrs Nash's objection relates to the same land, together with the fields to the south. They seek its inclusion within the settlement boundary and its allocation for housing. Hallam Land Management Ltd's objection relates to those fields and a much broader area to the east and south. It seeks the exclusion of this larger area from the green belt and its development in association with the adjoining Harry Stoke land, either as an allocation or as safeguarded land.

22.2 For the most part this land has been in the green belt since the North Fringe local plan, 1987. I have no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in maintaining the separate identities of the Harry Stoke area and Frenchay and assisting in urban regeneration. Overall, this is a large area and one that I would expect to be considered at a strategic level before a decision could be made to significantly draw back the green belt boundary towards the M32. As I have explained earlier in this chapter I do not consider that the time is right to make strategic changes to the green belt. A major review of the green belt will be undertaken in the next round of plans and it is at that stage that decisions would be made on issues such as this. Given the pending review of green belts I do not consider that this is an appropriate time to introduce the question of safeguarding all or any part of the area.

22.3 As regards the specific sites advanced by the objectors, it would be necessary to show that exceptional circumstances exist to justify a change in the green belt. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. I fully appreciate that aside of the green belt designation these sites, on the periphery of the built-up area could be considered as being reasonably sustainable, with good access to the services, facilities and jobs within the urban area. However, this does not constitute exceptional circumstances. I do not support an approach of incremental release of peripheral sites from the green belt. It is for the strategic planning process to take a measured view and to weigh up green belt considerations against arguments of sustainable patterns of development.

22.4 In my view Hambrook Lane represents a logical boundary for the green belt. The properties fronting Hambrook Lane are relatively low density, detached with large rear gardens. These gardens are prominent and potentially would provide the opportunity for consolidating development. With the sloping down of these gardens and the undeveloped fields beyond, development here would significantly reduce the sense of openness to this area. It is not possible to exclude all built development from the green belt and here I am satisfied that Hambrook Lane makes an acceptable and clear boundary to the green belt. That boundary is more defensible than one that followed the rear of the properties. The properties contribute to the character of the green belt and are appropriately included within it.

22.5 Development of the open land to the south and east of the Hambrook Lane properties would be in direct conflict with the openness of the green belt. This open land clearly performs a green belt function. In all I find that there are no exceptional circumstances here
to justify moving the green belt boundary to accommodate further development or to safeguard land. Any changes in this area should be determined as part of a strategic review.

22.6 There are, therefore compelling green belt arguments against supporting the objectors.

Recommendation

22.7 I recommend that no modification be made to the local plan.

23. Policy GB01 (Boundary) Mulgrove Farm, Stoke Gifford

Objections

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<tr>
<th>Objection</th>
<th>Name</th>
<th>Policy GB01 (Boundary)</th>
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<tbody>
<tr>
<td>343/015</td>
<td>Hallam Land Management Ltd</td>
<td>GB01 (Boundary)</td>
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<tr>
<td>525/001</td>
<td>Mr AC Crocker</td>
<td>GB01 (Boundary)</td>
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Issue

Whether this site should be released now from the green belt and allocated for housing.

Reasoning and conclusions

23.1 Both objectors seek the exclusion of this 32 hectare site from the green belt and its allocation for housing. This land has been in the green belt since its inception in 1968. In my view it performs a green belt purpose. The site for the most part is open and visually prominent. It helps to check the unrestrained sprawl of the built-up area. The M4 runs through the narrow gap between Stoke Gifford and Winterbourne. Nevertheless, this open land adds to the perception locally, and from the motorway network, of Winterbourne being a separate community outside of the main built-up area of Bristol. Although separated from the wedge of green belt that extends down the M32 corridor by the railway embankment, in my view it does contribute to this very important approach to the city centre. As one travels eastwards along the M4 towards the M32 into Bristol, one can see clearly the elevated open ground of the objection site. This open land then continues after the railway embankment and spreads down into the M32 corridor.

23.2 This is a large area and one that I would expect to be considered at a strategic level before a decision could be made to significantly draw back the green belt boundary towards the M4. A site of this size, in this location, cannot be considered to be capable of being a local change to the green belt. As I have explained earlier in this chapter I do not consider that the time is right to make strategic changes to the green belt. A major review of the green belt will be undertaken in the next round of plans and it is at that stage that decisions would be made on issues such as this.

23.3 It is necessary to show that exceptional circumstances exist to justify a change in the green belt. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development.

23.4 I fully appreciate that aside of the green belt designation this site, on the periphery of the built-up area, could be considered as being a sustainable location, with good access to the services, facilities and jobs within the urban area, the proposed park and ride site and to Parkway station. It is well related to the route being safeguarded for a rapid transit system. I note the view that the plan has had to find greenfield sites, so this site is on a par with some allocations in that respect. I note too the comments made about the merits of other
sites such as at Emlemson Green East and Hortham Hospital. This land lies within the motorway box and thus can be construed as being within the PUA for planning purposes.

23.5 Putting aside the issue of green belts I consider that this site compares very favourably in sustainability terms with Emlemson Green East, Hortham Hospital and others that are identified for development. The M4 would form a robust and defensible boundary, avoiding the danger of a complete closing of the gap with Winterbourne. However, these arguments do not constitute exceptional circumstances. I do not support an approach of incremental release of peripheral sites from the green belt. It is for the strategic planning process to take a measured view and to weigh up greenbelt considerations against arguments of sustainable patterns of development.

23.6 In all I find that there are no exceptional circumstances here to justify moving the green belt boundary to accommodate further development. Any changes in this area should be determined as part of a strategic review. There are compelling green belt arguments against supporting the objectors.

Recommendation

23.7 I recommend that no modification be made to the local plan.

24. Policy GB01 (Boundary) Old Gloucester Road, Stoke Gifford

Objection

97/001 Golledge Estate GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify the release of land from the green belt.

Reasoning and conclusions

24.1 This site immediately adjoins the site considered in the previous item. It comprises a small wedge of land sandwiched between the M4 and the Old Gloucester Road. It would be illogical to allow the development of this land in isolation from a decision on the larger area of green belt between the M4 and the built-up edge of Stoke Gifford. In my view the reasoning set out in the previous item applies here as well. There are no exceptional circumstances that might justify a release of this small area of land.

Recommendation

24.2 I recommend that no modification be made to the local plan.

25. Policy GB01 (Boundary) Bristol Road, Thornbury

Objection

265/011 Persimmon Homes GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify the release of land from the green belt.
Reasoning and conclusions

25.1 The objector seeks the exclusion of this site from the green belt in order to allow for a residential development. The site lies at the southern entrance into the town and forms an attractive and important part of the rural setting of this part of the historic centre.

25.2 I have no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, safeguarding the countryside from encroachment, preserving the setting and special character of Thornbury and assisting in urban regeneration. It is clear that the site contributes to the openness and visual amenity of the green belt in this location.

25.3 It is necessary to show that exceptional circumstances exist to justify a change in the green belt. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. If Thornbury were needed to expand then there are areas to the west, north and east that are unaffected by green belt designations and are environmentally much less damaging than this site. I fully appreciate that this site on the periphery of the town centre could be thought of as being reasonably sustainable, with good access to the services, facilities and jobs within the town. However, this does not constitute exceptional circumstances. I do not support an approach of incremental release of peripheral sites from the green belt.

25.4 Aside of the compelling green belt arguments I believe that there are also very strong landscape reasons that weigh heavily against this land being allocated for development. The site forms part of the open, rural edge to Thornbury. It is visually separated from the urban area by a strong tree and shrub belt. It forms an important part of the attractive, open setting of the town. Its development would introduce built form into the countryside setting to the detriment of both the character and appearance of the historic parts of the town centre and its Conservation Area.

25.5 There are, therefore, compelling green belt and landscape arguments against supporting the objectors.

Recommendation

25.6 I recommend that no modification be made to the local plan.

26. Policy GB01 (Boundary) West Street, Tytherington

Objection

306/001 G & S J Smith GB01 (Boundary)

Issue

Whether infill development should be allowed in the West Street area of the village, south of the railway embankment.

Reasoning and conclusions

26.1 The objectors are seeking changes to the plan to enable an infill development on the plot of land immediately south of the railway embankment. This part of the village lies within the green belt and outside of the settlement boundary. In my view there are no exceptional circumstances that might justify moving the green belt boundary. The railway embankment
forms a clear and defensible edge to the green belt. West Street, south of the railway embankment, is peripheral to the village and generally has a less developed character and appearance than the core of the village to the north. I am quite content that the green belt has been drawn in the most appropriate position here. In turn, I do not believe that there are grounds to redraw the green belt boundary so as to exclude a small group of properties along West Street.

26.2 However, the inclusion of this small area within the defined settlement boundary would, by way of policy GB1, allow for infill development provided that there was no adverse impact on the visual amenity of the green belt. The settlement boundary was defined in the Rural Areas local plan in 1991. This excluded the land south of the railway embankment as it was felt that it was more rural in character than the main area of the village. Although there is a character change between the main area of the village and this part of West Street, I found on my inspection that that part of West Street close to the railway line has more in common with the village than the more rural parts beyond. There is a clear break between Greyleaze and the farms beyond. Development up to Greyleaze is fairly intensive and includes relatively new infill properties. On the other side of the road, Spindles has been extended and converted recently and the former quarry appears to be in use as a Training Centre, with heavy vehicles parking there. On balance, and it is a finely balanced decision, I am of the view that because of the intensity of development on West Street up to Greyleaze, it would not be unreasonable to treat this group as being within the village.

26.3 The key concern is that any development that would be allowed as a result of altering the village settlement boundary should not materially impact upon the existing character and openness of the green belt. Any proposals that may come forward as a result of this change in settlement boundary would have to meet the tests in policy GB1. In my view these should be sufficient to turn away any unacceptable development. In terms of the definition of a detailed settlement boundary on this side of the railway embankment, I consider that this should be limited to the residential properties along West Street up to Greyleaze. Because of the more open nature of properties along Itchington Road I do not consider that these should be included.

Recommendation

26.4 I recommend that the local plan be modified by extending the settlement boundary to include the residential properties along West Street up to and including Greyleaze.

27. Policy GB01 (Boundary) London Road, Warmley

Objection

414/001 The British Land Company Plc GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify excluding this land from the green belt.

Reasoning and conclusions

27.1 At present the green belt boundary runs along London Road between the railway line and the Bridgeyate crossroads. This is a clearly defined and defensible boundary. In drawing the boundary along this road a number of properties have been included within the green belt, including the Griffin Inn. To include small areas of properties within the green belt is not that unusual. The proposal is to redraw the boundary so that it would run along the rear
boundaries of the properties fronting London Road and Winfield Road. That boundary would be less well defined than the present one, following a more circuitous and less distinct line.

27.2 In order to justify non-strategic changes to the green belt such as this it is necessary to find exceptional circumstances. I find none. The boundary, as drawn, helps to ensure that any further unrestricted sprawl of the urban area is contained by London Road. The exclusion of these properties could allow further development on the north side of London Road. This could be to the detriment of the overall character and openness of the green belt in this area.

Recommendation

27.3 I recommend that no modification be made to the local plan.

28. Policy GB01 (Boundary) Westerleigh Road, Westerleigh

Objection

455/005  Mr Fox

GB01 (Boundary)

Issues

Whether the village of Westerleigh should be inset within the green belt.

Whether this land should be allocated for residential development.

Reasoning and conclusions

28.1 Westerleigh lies about 1km south of Yate. It is washed over by the green belt, with provision only for infill development within the settlement boundary. This objection and associated objections seek the allocation of a 1.68 hectare site for housing.

28.2 I am satisfied that the village is correctly treated in the local plan. It is a small village with very limited facilities and services. For almost all needs residents would have to travel to other towns for their needs. There is only an hourly bus service to Yate and Bristol. If further development were to be allowed here it is likely to generate additional need to travel and increase reliance upon the car. It is not a sustainable location for more housing. Westerleigh was defined in the Rural Areas local plan as a village where development should be limited to small scale infilling. I see no reason to question that approach. The status of the village, and its unsuitability for further development beyond the small scale, means that it should not be inset within the green belt. The green belt should continue to wash over it.

28.3 In terms of the scale of the village the site is a large one, capable of accommodating upwards of 50 dwellings. As I have explained earlier in this chapter I do not consider that the time is right to make strategic changes to the green belt. I note what is said about Yate and its suitability to accommodate further development. If further development is to take place in the Yate area, then I do not consider that a site in a nearby small village would be the best choice. In any event, a major review of the green belt will be undertaken in the next round of plans and it is at that stage that decisions would be made on issues such as this. Given the pending review of green belts I do not consider that this is an appropriate time to introduce the question of safeguarding all or any part of the area.

28.4 As regards the specific site advanced by the objector, it would be necessary to show that exceptional circumstances exist to justify a change in the green belt. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new
housing development. If there was I do not think that this site would score highly. It immediately adjoins the village, but forms part of its countryside setting. In my view it performs a number of green belt functions, including safeguarding the countryside from encroachment and maintaining the separation between the village and Yate. Development of this open land would be in direct conflict with the openness of the green belt. I note the particular circumstances advanced by the objector but do not consider that these constitute the exceptional circumstances necessary to justify moving the green belt boundary to accommodate further development at Westerleigh.

Recommendation

28.5 I recommend that no modification be made to the local plan.

29. Policy GB01 (Boundary) Bath Road, Willsbridge

Objection

418/001 Edward Ware New Homes Ltd GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify excluding this land from the green belt.

Reasoning and conclusions

29.1 The objector seeks the exclusion of this site from the green belt and its inclusion within the settlement boundary with a view to its future development. The site, an open field, lies at the eastern edge of the Bristol conurbation, in the narrow gap between the main urban area and the village of Bitton. It was designated as green belt in 1968 and clearly performs a green belt function, satisfying four of the five purposes of a green belt set out in paragraph 1.5 of PPG2.

29.2 There is no strategic imperative to alter the green belt boundaries on the east fringe of Bristol. It is necessary, here, to show that exceptional circumstances exist to justify a change in the green belt. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. Nor is there a need to provide further employment land in this location.

29.3 I do not have before me any weighty arguments that could be considered to constitute exceptional circumstances. I do not support an approach of incremental release of peripheral sites such as this from the green belt. This is an open site, clearly visible to the public. It is part of the countryside rather than the built development to the west. I have no doubt that its development would be in conflict with the purposes of the green belt in this area and would cause serious harm to those purposes.

Recommendation

29.4 I recommend that no modification be made to the local plan.
30. Policy GB01 (Boundary) Jarretts Nursery, Willsbridge

Objection

44/001 Linden Developments Ltd GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify excluding this land from the green belt.

Reasoning and conclusions

30.1 The objector seeks the removal of this 1.9 hectare site from the green belt, its inclusion within the settlement boundary and its allocation for housing. The site is occupied by a garden centre and ancillary activities. There is a large, low, unobtrusive building with much of the rest of the site in open sales/storage or left unused. The green belt in this area was established in 1968, with the built development on the south side of the A431 included within it. As part of the Kingswood local plan process, 1991, the properties facing Bath Road were excluded from the green belt. The Inspector at that time recognised that the area had characteristics that were typical of the urban fringe. He also considered the area has a particularly clear green belt function as it lies in the relatively narrow gap between Kingswood and Keynsham. He felt that the objection land, including the land currently the subject of this objection, needs to be accorded green belt status to prevent significant erosion of this narrow gap. I see no reason to differ from his conclusions.

30.2 There is no strategic imperative to alter the green belt boundaries on the east fringe of Bristol. It is necessary, here, to show that exceptional circumstances exist to justify a change in the green belt. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development.

30.3 This site, on the periphery of the built-up area could be considered as being a sustainable location, with reasonable access to the services, facilities and jobs within the urban area. There is no ready framework to consider the relative merits of sites as per PPG3 paragraph 31. However, I do not consider that this site is so superior to the allocated sites as to weigh strongly in favour of releasing this site from the green belt. I note in particular the views expressed on Hortham Hospital. I consider those separately in chapter 8 of my report. I appreciate too that this site is previously developed land. However, in view of my conclusions regarding the achievement of a satisfactory housing land supply provision and the inappropriateness of incremental release of peripheral green belt sites, I do not find that these arguments constitute exceptional circumstances. It will be for the strategic planning process to take a measured view and to weigh up green belt considerations against arguments of sustainable patterns of development.

30.4 Although there is a garden centre operating from the site, much of it remains open in character. Parts relate much more strongly to the countryside than the urban ribbon along the south side of Bath Road. In my view the site plays an important role in green belt terms, of preventing Willsbridge from merging with Keynsham. It also helps to check the unrestricted sprawl of development south of Bath Road. I fully accept that from many public viewpoints this site does not add much to the perception of a gap between these areas. However, from the footpath that runs through the site and from the cyclepath to the east, the site is visible and built development across the site would change the character and appearance of this area of land. The gap with Keynsham is very narrow at this point. Any diminution of this sensitive gap would unacceptably undermine the main purpose of the green belt in this location.
30.5 In my view the site performs a green belt function and is properly included within the green belt. Development of housing on it would serve unacceptably to diminish the perception of a gap between the main urban area and Keynsham. I do not consider that the arguments advanced in favour of releasing this site constitute exceptional circumstances such as to justify its removal from the green belt.

Recommendation

30.6 I recommend that no modification be made to the local plan.

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31. Policy GB01 (Boundary) Willsbridge Hill, Willsbridge

Objection

196/003 Mr M Deaker GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify the exclusion of this site from the green belt.

Reasoning and conclusions

31.1 This objection and associated ones made to housing policies H1A and H1B and the Proposals Map seek the removal of this site from the green belt and its inclusion within the settlement and its allocation for residential development. This land was first included within the green belt in 1968. It comprises a section of the Siston Brook valley, with a wooded river corridor and open spaces on its upper slopes, with limited development within the area. It forms part of the narrow stretch of green belt that separates this part of the east fringe of Bristol from Keynsham to the south.

31.2 In my view there is no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in preventing the merging of towns, safeguarding countryside and in a small way assisting in urban regeneration. Whilst Willbridge Hill would represent a firm boundary to draw back the green belt boundary to, that would conflict with its important role as part of the very narrow stretch of green belt between East Bristol and Keynsham. The essential characteristic of green belts is their permanence. I find no exceptional circumstances here that warrant a change to this longstanding area of green belt.

31.3 Whilst the nature conservation value of the site and its topography would limit the potential of the site for housing, that does not mean that development here could be carried out without harm to its general openness. The change sought does not represent a minor alteration to the green belt. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. There are, therefore compelling green belt arguments, aside of those very strong ones related to nature conservation, landscape and amenity, against supporting the objector.

Recommendation

31.4 I recommend that no modification be made to the local plan.
32. Policy GB01 (Boundary) Bristol Road, Winterbourne

Objection
281/001 Mrs J Churchill GB01 (Boundary)

Issue
Whether there are exceptional circumstances that justify the exclusion of this site from the green belt.

Reasoning and conclusions
32.1 This objection and associated ones made to housing policies seek the removal of this site from the green belt and its inclusion within the settlement boundary of Winterbourne with a view to its development for housing. This land was first included within the green belt in 1968 and forms part of the narrow gap between Winterbourne and the North Fringe of Bristol. It comprises 6 hectares of open agricultural land at the edge of the settlement. It is a prominent site.

32.2 In my view there is no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in preventing the merging of towns, safeguarding countryside and in a small way assisting in urban regeneration. Development here would fundamentally conflict with the green belt function of the land, causing considerable harm to the narrow gap between Winterbourne and the main urban area. The essential characteristic of green belts is their permanence. I find no exceptional circumstances here that warrant a change to this longstanding area of green belt.

32.3 The change sought does not represent a minor alteration to the green belt. It is a substantial site capable of accommodating upwards of 180 dwellings. Winterbourne is not a very sustainable location for development. It will be for the next strategic plan to examine the most sustainable pattern of development in the context of a review of green belt boundaries. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. There are, therefore compelling green belt arguments against supporting the objector.

Recommendation
32.4 I recommend that no modification be made to the local plan.

33. Policy GB01 (Boundary) Silverhill School, Winterbourne

Objection
14/003 Silverhill School GB01 (Boundary)

Issue
Whether there are exceptional circumstances that justify the exclusion of this site from the green belt.

Reasoning and conclusions
33.1 The objector seeks the exclusion of this site from the green belt and its inclusion within the development limits of Winterbourne. The site was partially included in the green belt in
1968. In due course the Rural Areas Local Plan, 1991, included the whole site within the green belt.

33.2 The site is occupied by the Silverhill School, based around Winterbourne House, and associated buildings and grounds. It is partially bounded by a high stone wall, limiting views into the site. Nevertheless, views are possible over the wall and across the grounds from the south and south west. As large parts of the site are not built on, views over the wall and across the site give the perception of open, undeveloped ground behind. In my view the site performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in preventing the merging of towns, safeguarding countryside and in a small way assisting in urban regeneration. If the site were to be excluded from the green belt and included within the settlement boundary then considerable development would be possible which would fundamentally conflict with the green belt function of the land. I find that the site has been properly included within the green belt.

33.3 Although a sizeable settlement, Winterbourne is not a very sustainable location for development. It has limited facilities and services and is generally unsuited to receive any significant amounts of new development. I do not find compelling sustainability grounds in support of extending the settlement boundary to include this land. It will be for the next strategic plan to examine the most sustainable pattern of development in the context of a review of green belt boundaries. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development.

33.4 The essential characteristic of green belts is their permanence. For changes to be made exceptional circumstances need to be found. The objectors wish, amongst other things, to rebuild the school to meet modern requirements; conserve and put to good use the listed House; re-establish the curtilage of the listed building and improve the access. The inclusion of this site within the green belt does not mean that no changes could be made to the listed building and school premises. It may be possible to carry out changes that did not have a greater impact on the openness of the green belt and that achieved many of the desired improvements being advanced by the objectors. That will be for discussions with the council. For my part I am not persuaded that these benefits and the others advanced are of such force as to constitute exceptional circumstances.

Recommendation

33.5 I recommend that no modification be made to the local plan.

34. Policy GB01 (Boundary) The Cloisters, Watley End, Winterbourne

Objection

402/001 Robert Frederick John Gooding GB01 (Boundary)

Issue

Whether there are exceptional circumstances that justify the exclusion of this site from the green belt.

Reasoning and conclusions

34.1 The objector seeks the removal of his land from the green belt and designated for residential development. The land in question is open, agricultural land set, in a prominent position, within the narrow gap between Winterbourne and Frampton Cotterell. It was
included within the green belt in 1991. In my view there is no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in preventing the merging of towns, safeguarding countryside and in a small way assisting in urban regeneration. Development here would fundamentally conflict with the green belt function of the land, causing considerable harm to the openness, character and appearance of the narrow gap between Winterbourne and Frampton Cotterell.

34.2 The essential characteristic of green belts is their permanence. I note the comments regarding the loss of agricultural value and the local difficulties. However, I do not find these are exceptional circumstances here that might warrant a change to this area of green belt.

34.3 Winterbourne/Frampton Cotterell is not a very sustainable location for development. It will be for the next strategic plan to examine the most sustainable pattern of development in the context of a review of green belt boundaries. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. There are, therefore compelling green belt arguments against supporting the objector.

Recommendation

34.4 I recommend that no modification be made to the local plan.

35. Policy GB01 (Boundary) Dyer's Lane, Engine Common, Yate

Objection

455/010 Bovis Homes (South West) Ltd GB01 (Boundary)

Issue

Should land at Dyer's Lane be identified for housing and recreation?

Reasoning and conclusions

35.1 The objection site is divided into two parts: North of Dyer's Lane is a 4.5 hectare field currently shown as being within the green belt. South of Dyer's Lane is a 1.4 hectare site occupied by farm buildings and associated fields. This latter site lies between the defined settlement boundary of Yate and the green belt. The objector seeks the removal of the larger site from the greenbelt and its allocation as recreational space or as safeguarded land and the allocation for housing of the smaller site.

35.2 I have considered housing needs in the Yate area in the strategy chapter of my report. I conclude there that it is not necessary in this plan period to identify allocation sites within Yate. A significant level of development will continue to be possible within the town settlement boundary under policy H2. The essential characteristic of green belts is their permanence. I have considered elsewhere the question of the green belt boundary around Yate. It will be for the next strategic plan to examine the most sustainable pattern of development in the context of a review of green belt boundaries. For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new development. Accordingly, I do not support the removal of land from the green belt.

35.3 With regard to the site north of Dyer's Lane, the recreational use of this site is not inhibited by its inclusion within the green belt. This site performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, safeguarding
countryside and in a small way assisting in urban regeneration. Built development here would fundamentally conflict with the green belt function of the land, causing harm to the openness, character and appearance of this area. In the light of the above I do not find there are exceptional circumstances here that might warrant a change to this area of green belt.

35.4 As regards the southern part of the site, lying between the green belt and the town settlement boundary, this thin strip of land provides a soft edge to the town. The farm complex and associated fields serve as a break between the industrial development south of Iron Acton Way and the open countryside to the north. Given that I have concluded that there is no need for land to be allocated around Yate in the plan period, I do not support the incremental spread of development beyond the defined settlement boundary in this location.

Recommendation

35.5 I recommend that no modification be made to the local plan.

36. Policy GB01 (Boundary) Engine Common/Tanhouse Lane, Yate

Objection

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Issue

Should this area north of Yate be added to the green belt?

Reasoning and conclusions

36.1 As I have concluded in respect of policy GB1, item 2 above, and in my introductory comments to the consideration of green belt sites, it is not for this plan to make strategic changes to the green belt. This is an issue that will be considered by the next round of plans.

Recommendation

36.2 I recommend that no modification be made to the local plan.

37. Policy GB01 (Boundary) Shire Way, Yate

Objection

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Issue

Whether exceptional circumstances exist here to justify removing the whole site from the green belt.

Reasoning and conclusions

37.1 The objector is concerned that the green belt boundary as shown on the Proposals Map would inhibit the ability of the Community Association to provide necessary facilities for the
local community. The council clarified at the inquiry that only part of the site lies within the green belt. The area shown orange on the objector's plan attached to his evidence, Doc 38A, lies outside the green belt. The orange land lies within the settlement boundary and the council confirmed that, in principle, there was no objection to built development upon that part of the site. On the green belt land, playing fields and activities such as outdoor bowls would be appropriate, with changing facilities being acceptable provided they preserved the overall openness of the area. The objector indicated that this approach would go a long way to solving the problem.

37.2 As regards the green belt land I am satisfied that it has been appropriately included within the green belt. It is open land that that physically and visually links the broad swathes of green belt to the west and south of Yate. It has been in the green belt for many years and clearly serves a green belt function, restricting the spread of the built up area of the town, safeguarding the countryside and helping to prevent Yate and Westerleigh from coalescing. I acknowledge the important role of the Community Association in meeting the social and sporting needs of the local area. In this context I am satisfied that the division across the site, to provide land within the green belt and land within the settlement boundary, allows reasonable opportunity for the Association to continue to provide and improve local facilities here. On this basis I do not consider that there are exceptional circumstances that justify the removal of the whole site from the green belt.

Recommendation

37.3 I recommend that no modification be made to the local plan.

38. Policy GB02 and paragraphs 5.16 to 5.21: Land at Hanham Abbots Road, Hanham

Objections

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Support

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Issues

Do the exceptional circumstances exist as to justify the inclusion of the GB2 site within the green belt?

Should other, neighbouring land be excluded from the green belt?

Reasoning and conclusions

38.1 Policy GB2 proposes the inclusion of 15.2 hectares of land at Hanham within the green belt. This site currently forms an island, surrounded by green belt land. Land to the south of the GB2 land, running along the Avon valley, was included in the original 1968 green belt. The GB2 land and that to the north was not so included. However, in 1991 the Kingswood Local Plan added this area to the green belt, to form a northerly extension, encompassing Stonehill, from the Avon valley up to the A413. Following a successful legal challenge the portion of this extension, the GB2 land, was excluded from the green belt. GB2 is intended, by the council, to return to the position before the legal challenge. The objections variously
seek to maintain the current position, with the GB2 land being excluded from the green belt, and to remove parts of the surrounding area from the green belt.

38.2 In my view the exclusion of the GB2 land from the green belt creates an obvious anomaly. The intention of the 1991 Kingswood local plan was to bring the whole area north of the Avon valley, between Hanham and Longwell Green into the green belt. This reflected the structure plan guidance that the inner boundary of the green belt should generally follow the limits of existing development. The anomaly has arisen as a result of the successful legal challenge made in respect of the GB2 land. This creates a hole in the broad wedge of land extending northwards from the Avon valley. I fully accept that this reflects the extent of the land interest of those that challenged the council's decision to include the land in the green belt. Had other adjoining landowners joined in with the challenge it may well have been that the whole of the then proposed addition to the green belt would have been deleted from the plan.

38.3 Nevertheless, the statutory position is that most of the wedge of land is green belt land and the local plan is now seeking to fill in the "hole" created by the legal challenge. My understanding of the legal position is that the challenge to the green belt status was successful on the basis that the council, and in turn the previous local plan Inspector, had failed to give specific consideration to whether there were exceptional circumstances prevailing that justified the revisions to the green belt boundary. The legal decision does not of itself give a view on the planning merits and whether there were exceptional circumstances. That test is now before me.

38.4 The land forming GB2 is very much part of a wider landscape. It does not have characteristics that are separate from or different to the surrounding green belt land. It is an integral part of the broad sweep of open land that extends along the Avon valley and through to the rising ground to the north, encompassing the prominent Stonehill. In my view the GB2 land, both separately and cumulatively with the surrounding green belt land, fulfils a number of green belt purposes. Its inclusion within the green belt would help to check the unrestricted sprawl of the built-up area of eastern Bristol. It would both help to prevent Hanham and Longwell Green from merging, and help to maintain a sense of separation between this part of Bristol and nearby Keynsham to the south. It would assist in safeguarding the countryside from encroachment. Stonehill is a prominent and important local feature in this area. It is visible for some distance around and provides a most valuable open break between extensive built-up areas, areas that have experienced a great deal of new development in recent years. To a degree it would also assist in urban regeneration by encouraging the recycling of urban land. In my view the green belt merits of this land are very strong indeed.

38.5 Thus, I have no doubt that the GB2 land fulfils a green belt function. However, an important characteristic of green belts is their permanence. It would be entirely inappropriate to include the land within the green belt if there were a chance of this area being required for development in the future. A sub-regional spatial strategy will need to be prepared in the near future. This will have to revisit the role of the green belt around Bristol and consider what locational strategy would provide a sustainable form of development in the medium to long term. Clearly, it would be wrong to change green belt boundaries at this time if there were a realistic chance of this land being needed for development.

38.6 I am fully satisfied that the requirements for the district to 2011 can be met without considering the potential of this land. I am also of the opinion that there are quite compelling reasons to believe that any future review would support the retention of the green belt in this area. The sweep of open land along the Avon valley together with the wedge of land encompassing Stonehill is a very important open feature. Its loss would very seriously compromise the character and quality of this area. I have no doubt that there are likely to be other areas around Bristol much more suited to development than this area. To include this
land now within the green belt would not unacceptably prejudice the longer-term strategic decisions that will have to be made. It may be said that in including this land within the green belt brings the local plan into better conformity with the JRSP which, at policy 16, indicates that the inner boundary should follow generally the limits of existing development or that already committed.

38.7 I appreciate that the high ground of Stonehill could be protected from development by means other than green belt policy. However, the value of this high ground is enhanced by its linkage with the lower open ground to the south. It is a landscape that should be considered in its entirety. The wider area is visible from a number of vantage points and its importance as an open area is reinforced by the Avon Ring Road which passes in cutting through the area. To allow development on the GB2 land would visually isolate the high ground from the open land to the south and would provide for the coalescence of Hanham and Longwell Green.

38.8 In my view there are exceptional circumstances that justify the decision to alter the green belt by including the GB2 land within it. The history of this land since 1968 suggests strong pressure to retain it as open land. Its exclusion from the green belt in 1991 was on the basis of the way that the PPG2 test was or wasn’t applied. That decision has created a clear anomaly that has no justification on the ground. The land very certainly serves a green belt function. Its exclusion from the green belt is likely to lead to pressure for development which could seriously compromise the wider integrity of the surrounding green belt land. In my view it is very unlikely that it would be needed for anticipated future development requirements. For these reasons I conclude that there are exceptional circumstances which justify the council’s proposal to include this land within the green belt. I support the council’s suggestion that the wording of the supporting text should be strengthened. This should reflect my conclusion that the circumstances, including the green belt merits, are so overwhelming as to constitute exceptional circumstances.

38.9 I shall deal briefly with those objections seeking the removal of adjoining sites from the green belt. It follows from my conclusions above that I consider the wider area, along the Avon valley and through the wedge of land to the A431, serves a green belt function. I have no doubt at all that this is a valuable open area in green belt terms. It also provides recreational opportunities for local people. I am satisfied that longer term development needs could be met in a sustainable manner elsewhere around Bristol and that there is no need to allow for future development needs on this land. It is clearly evident that there are no exceptional circumstances here that might justify reducing green belt boundaries. I do not, therefore, support those objectors who wish to exclude land here from the green belt.

Recommendation

38.10 I recommend that the local plan be modified by the strengthening of the text to the effect that the circumstances, including the green belt merits of the land, are so overwhelming as to constitute exceptional circumstances.

39. Policy GB03 and Paragraphs 5.22 to 5.29 – Land at Severn Beach

Objections

31/002  Representatives of E.A.C. Ball (Deceased)  GB03
32/002  J R & P Willcox  GB03
81/001  Enron Europe Ltd  GB03
92/003  Banner Homes Ltd  GB03
96/002  Downend Estates Ltd  GB03
183/002  Mr L T Liddiatt  GB03
219/003  Mr S Moran  GB03
Do the exceptional circumstances exist as to justify the inclusion of the GB3 land within the green belt?

Reasoning and conclusions

39.1 Policy GB3 proposes the extension of the green belt in the Severn Beach area to include, broadly, the land between the railway line and the area of extant planning permissions to the south. Both Severn Beach and Pilning would become washed over settlements within the green belt.

39.2 Policy GB2 of the 1994 ACSP indicates that the inner boundary of the green belt will be defined so as to follow generally the limits of the existing development except in the Avonmouth/Severnside policy area where the boundary will follow generally the line of the Bristol to South Wales railway from the Severn Estuary to Pilning, then run to a point west of Swanmoor Bridge and from there to a point near Hallen. That reflects the inner boundary as shown in the Rural Areas local plan 1991.

39.3 Policy 16 of the JRSP, 2002, indicates that the inner boundary of the green belt shall follow generally the limits of existing development or that already committed. It is no longer specific as to the detail of the boundary in the Severn Beach area. The council believes that this new wording was intended to allow authorities greater discretion than in the past to set detailed boundaries in local plans in the context of the overall strategy. I am very uncomfortable with that interpretation. The EiP Panel reported, with some logic in my view, that the difference in policy wording was immaterial and should not be taken as requiring or facilitating local adjustments. There appears to be no change in the respective Key Diagram depiction of the extent of the green belt. There is no policy imperative in the JRSP to change the green belt boundary in this area. At best it is permissive only.

39.4 To interpret the change in policy wording between the 1994 and 2002 structure plans in the way the council has seems to me to fly in the face of national guidance. Changes to the green belt boundaries should not be made unless alterations to the structure plan have been approved or other exceptional circumstances exist. (PPG2 paragraph 2.7) Localised changes can be made where exceptional circumstances exist. They are likely to be small in scale and few in number.
39.5 Strategic changes need to be spelt out in the structure plan. It is not enough, in my view, to rely on a change of wording that is both very unspecific and requires no direct change. Certainly, I can find nothing in the JRSP that leads me to the view that the green belt boundaries in this area ought to be changed. The wording is conditioned by the word "generally". Paragraph 2.7 of PPG2 refers to "...alterations to the structure plan.....which necessitate such revision." On the basis of the council's interpretation it would be free to make any manner of changes, whether they be strategic or local ones. That cannot be right. If it were, the advice in paragraph 2.7 of PPG2 would become meaningless. In passing, I would suspect that the change to the wording was made in the context of a move to make structure plans more strategic and less detailed in content.

39.6 The extent of the land the council wishes to include within the green belt is very substantial, extending to over 250 hectares. It cannot under any meaningful interpretation be considered to be a localised change. A change of boundary of this size, in this location, must be considered to be strategic in scale, altering the general nature of the green belt. It needs to be supported by a clear strategic imperative, which it is not. Leaving the boundary as it was would not, in my opinion, bring the local plan out of conformity with the JRSP.

39.7 Even if the change of wording in the JRSP supports the council's position, this is a wholly inappropriate time to be making changes to the green belt in this area. This is an area that is subject to longstanding planning permissions. It falls within the Avonmouth/Severnside area which is recognised by the JRSP as being of strategic importance. Policy 14 of the JRSP provides potentially for very considerable employment development over and well beyond the plan period. Although not now before me, there have been plans mooted for very substantial residential development in this broad area. I consider the Severnside area in more detail in the strategy section on my report. Suffice it to say, I am not persuaded that it will be practical for the area to receive much development within the plan period, but in the longer term this area could be subject to very considerable expansion, reflecting the economic potential and the need for sustainable patterns of development.

39.8 It is clear that very substantial development could be achieved in the long term on land outside the area the council wishes to include within the green belt. However, to exclude this land from consideration at this stage would be entirely wrong. A review of green belts will need to be carried out as part of strategic and/or sub-regional spatial studies, which will look at the most sustainable options for the medium and longer term in the Bristol area. It is almost inevitable, in my view, that this area will feature prominently in such studies and whilst development may eventually be directed elsewhere, the options should not be closed down at this point in time. If the green belt were to be extended to this area, then there are real possibilities of it having to be redrawn again following the next round of development plans. Short term changes would run contrary to their essential characteristic of permanence.

39.9 If I am wrong on this point and the change should be considered a localised one, then there are not the exceptional circumstances needed to justify the change in the green belt boundary. I accept that much of the land in question (excluding the strip of land west of the Astra Zeneca and Terra sites) has the potential to fulfil a number of the green belt purposes, as has other areas of similar landscape in the area. That situation has not materially changed from when the boundaries of the green belt were previously set. Any green belt merits of the land fall well short of providing the exceptional circumstances required by national guidance to justify a change in the green belt boundaries.

39.10 In any event, the land is subject to a range of protective polices, which can operate in a manner that could prevent unacceptable development. Flooding is an issue here that needs to be resolved, but that does not in any way justify placing the land in the green belt. Severn Beach and Pilning are fairly substantial settlements, with a railway station and a range of local facilities and services. Existing policies can ensure that they grow in accord with their
function and place in the settlement hierarchy. They do not need to be washed over by the green belt to prevent inappropriate development.

39.11 For all these reasons I consider that there are very strong reasons not to support the council's proposal to extend the green belt in this area. It would be contrary to national guidance and is not justified by strategic guidance. There are no exceptional circumstances that might justify a change of the boundary of this scale. To change the boundary at this time would be entirely inopportune. Accordingly I recommend that the policy and supporting text be deleted from the plan.

**Recommendation**

39.12 I recommend that the local plan be modified by the deletion of policy GB3 and paragraphs 5.22 to 5.29.

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**40. Policy GB04 and Paragraph 5.30 – Safeguarded land at Harry Stoke**

**Objections**

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**Issue**

Should the local plan continue to safeguard this site with a view to its development post 2011?

**Reasoning and conclusions**

40.1 Some objectors are seeking the allocation of this site, whilst others seek its inclusion within the green belt.

40.2 The safeguarding of this site is not a new policy introduced by this local plan. The site forms part of a larger area of land that was left out of the green belt in 1968. The Bristol North Fringe local plan shows the site to be subject of a similar safeguarding policy to that now proposed. In these circumstances I have no difficulty with the principle of having a safeguarding policy for this site.

40.3 For the site to now be included within the green belt would, as paragraph 2.7 of PPG2 requires, have to be necessitated by alterations to the structure plan or by other exceptional circumstances. Neither of those situations applies here.
40.4 I have considered objections seeking the allocation of this site in detail in chapter 8a of my report. I have concluded that the site offers the potential for a sustainable development. It is well located and could make a significant contribution to meeting the housing land supply requirement. I have concluded in chapter 8 of my report that there is a substantial shortfall in housing land supply and I have concluded in item 66 of chapter 8a that this site offers a particularly good opportunity to assist in meeting the shortfall.

40.5 The site, being previously safeguarded land, has been earmarked for development at some stage. In my judgement the time is now right to bring the site forward for development. Accordingly, I recommend that policy GB4 and paragraph 5.30 be deleted from the plan.

Recommendation

40.6 I recommend that the local plan be modified by the deletion of policy GB4 and paragraph 5.30.

41. Policy GB05, Paragraphs 5.31 to 5.36 and Map 1 – Major developed site at Hortham Hospital, Almondsbury.

Objections

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Issues

Does the site fulfil the criteria to be a Major Developed Site in the green belt?

Are the criteria set out reasonable?

Reasoning and conclusions

41.1 In this section I consider only the question of whether it is right to consider this site as qualifying as a Major Developed Site in the green belt, as per Annex C of PPG2. The merits of the site for development and the council’s allocation of it for housing are considered in detail at item 17 of chapter 8 of my report.

41.2 Annex C of PPG2 sets out in some detail how major developed sites in the green belt should be treated. This former hospital site falls squarely within the definition of a major developed site. Paragraph C1 includes hospitals in this category. It occupied a very substantial area, with at the present time some 50 redundant buildings, spread over about 9 hectares, providing over 21,000 square metres of floorspace. I am entirely satisfied that the council is right to consider this site as being a Major Developed Site in the green belt.
41.3 Paragraph C4 of PPG2 provides for the redevelopment of such sites subject to a number of criteria. Having viewed the site I accept that a redevelopment rather than conversion scheme is the only realistic way forward. The criteria in paragraph C4 are replicated in the local plan policy GB5, together with an additional one related to transportation impacts. The approach taken by the policy is very much in accord with the national guidance. To clarify the extent of the site available for redevelopment the council has proposed further changes which limit the area suitable for redevelopment to 9 hectares, within the area now defined on the Proposals Map. I am content that these changes and the inclusion of the C4 criteria in the policy itself should allay any fears that the redevelopment would unacceptably extend the spread of development and harm the openness of the green belt.

Recommendation

41.4 I recommend that the local plan be modified in accordance with PC185, PC186 and PC187.
CHAPTER 6 - TRANSPORT

1. Chapter 6 - General

Objections

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Issues

Should the plan encourage the use of motor cycles as an alternative to the private car?
Should the plan include transport proposals for the Pilning and Severn Beach areas?

Reasoning and conclusions

1.1 No facilities have been identified which could be the subject of a local plan policy which would have the effect of encouraging the use of motor cycles, other than the possibility of a training centre which I deal with under Chapter 10 of the plan. The plan recognises the need to provide parking spaces for motor cycles in the standards under policy T7 and, in the absence of any other suggestions, I consider that this is as far as the plan can go. Matters such as the permitted use by motor cycles of high occupancy vehicle (HOV) lanes and the provision of secure motor cycle parking at transport interchanges are rightly dealt with by Council’s Local Transport Plan, and will no doubt be carried forward in reviews of that document.

1.2 No transport scheme for the Severnside area has yet been developed sufficiently to be included in a policy which would conform with the requirements of PPS12, so I am unable to recommend any modifications in this respect. However, the revised deposit draft does provide information on rail (paragraph 6.37A) and highway schemes (paragraphs 6.150 – 6.153) which are undergoing investigation.

Recommendation

1.3 I recommend that no modification be made to the local plan.

2. Introduction - Paragraphs 6.1- 6.18

Objections

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Issues

Should the plan give greater recognition to rural transport issues?

Does the plan give adequate consideration to ways in which global warming can be reduced?

Does the plan's description of the strategy of the Local Transport Plan (LTP) properly reflect the intentions of the LTP?

Should the plan pay more regard to the efficient use of transport infrastructure?

Reasoning and conclusions

2.1 Paragraphs 6.87, 6.88 and 6.89 seek to improve access for people living in rural areas, though since the objectives have now been achieved, the Council proposes that these paragraphs should be deleted from the plan. The plan allows for an increased level of parking provision in new development. Any network improvements that prove necessary in order to meet the needs of rural areas can be dealt with under successive versions of the Local Transport Plan. The objectors have not suggested how the plan could be changed to include land use implications of any such measures and nothing leads me to conclude that any modifications are necessary. National policy, including in the White Paper, "Our countryside: the future – a fair deal for rural England" (2000) and PPG13 (2001), recognises the greater dependence on private cars of people in rural areas and I agree with the Council (PC38) that the last sentence of paragraph 6.19 in the revised deposit draft version is an unnecessary repetition of that recognition. Furthermore, for it to be included in the plan suggests to my mind an acceptance that such dependence should continue unabated, which conflicts with the plan's objectives and the initiatives of the Local Transport Plan to provide attractive and useful alternatives for all residents, including those in rural areas.

2.2 The plan is strongly based on the concept of sustainable development in the location of new development and in the relationships between where people live, work, are educated, shop and access services and leisure. Various measures are included which aim to encourage the use of modes of transport other than the private car. I am satisfied that, within the restraints of the available technology and the legislative framework, it is fully compatible with recognised measures to control and reduce global warming. The matter of climate change is also addressed, outside the plan, by the Council's Local Transport Plan.

2.3 The bullet points in paragraph 6.11 reproduce accurately the main headings under which the strategy of the LTP is arranged. These, together with other, more detailed references to the LTP elsewhere in Chapter 6, seem to me to be a reasonable way for the 110 relevant pages of the publicly-available LTP to be summarised for the purposes of the local plan. It would not assist in an understanding of the strategy for its elements to be otherwise represented in paragraph 6.11. Similarly, paragraph 6.12 refers to a target of the LTP, which is a part of its district-wide strategy, and does not seek to make specific reference to levels of traffic associated with any site allocation in the plan. I conclude that no modification is needed to achieve any further clarification of the point. The Council has proposed justified changes to paragraph 6.12 (PC36 and PC37) in order that it should reflect the changed position set out in the LTP Progress Report July 2002.

2.4 The objectors who raise the fourth issue suggest modifications to paragraph 6.17, which is simply a summary of the local plan's transport strategy. The first modification suggested to meet the objection is already covered within the text of paragraph 6.16, which refers to optimising the use of existing infrastructure, modified where appropriate, as part of the local plan's transport objectives. The second suggested modification relates to the provision of new junctions on strategic highway routes and I deal with the specific examples that have been raised in my consideration of the Road Schemes paragraphs 6.149 and 6.153A.
Recommendation

2.5 I recommend that the local plan be modified in accordance with PC36, PC37 and PC38.

3. Policy T01, T01(1) and Paragraphs 6.21-6.27 – Rail passenger services and facilities – Omissions and Parkway Station

Objections

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Issue

Should the plan safeguard any other railway station sites?

Reasoning and conclusions

3.1 At Winterbourne and Frampton Cotterell the Council has identified technical, operational and financial problems which, under the requirements of PPS12, would preclude the inclusion of railway stations in the present plan. I have recommended no change to the plan to include specific development proposals for the Frampton Cotterell area, so developer contributions will not be available to help resolve these difficulties. Nevertheless, policy T2 prevents development which would prejudice the reuse of railway track beds and associated land for transport provision by protecting from development the land associated with the railway, such as the former station site in these locations, in case of a change in circumstances in the future. On the basis that policy T2 applies in the same way to Filton Station, the objection relating to the omission of that site has been withdrawn.

3.2 Henbury Station is in a somewhat different category, in that the disused station has long been put to another use and so may not be afforded protection by policy T2. The Bristol-Avonmouth-Filton Rail Routes Study has identified not only the benefits of the proposal in general terms, but also physical and possible financial constraints for the present location which may be fewer were an alternative site chosen, west of the B4055. The study does not assess the area of land needed at either location, so this cannot be identified on the Proposals Map and the evidence is that implementation of the proposal would be beyond the plan period. Land likely to be required north of the track is in the Green Belt where at least part of the development may well be inappropriate so, even if the land take were established, the area could not be safeguarded on the basis of the evidence currently available. The plan would therefore conflict with PPG2 and paragraph 5.17 of PPG12 if it were to include an allocation for Henbury Station.

3.3 The objection of the Highways Agency has been overcome by the deletion of paragraph 6.26 in the revised deposit draft, as not being relevant now that Parkway Station has been rebuilt.
Recommendation

3.4 I recommend that no modification be made to the local plan.

4. Policy T01 - T01(2) and Paragraphs 6.28-6.29 – Rail passenger services and facilities – Car park at Yate Station

Objections

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Issues

- Should the plan include further land for car park extensions at Yate?
- Should the plan emphasis the effect of the car park extension in making Yate a more sustainable location for residential development?

Reasoning and conclusions

4.1 The assessment of the Council is that the allocated site for a car park extension at Yate will be adequate to the needs, at least for the plan period. Any further land would therefore be for a car park proposal which is neither firm, nor with any reasonable degree of certainty of proceeding within the plan period. As such, its inclusion in the plan would not conform with the advice in PPG12 and PPS12.

4.2 Paragraph 6.29 justifies clause 3 of the policy in terms of the level of usage of the car park at Yate Station. It also recognises that enhancements to the rail service at Yate would, amongst other things, provide the opportunity for increased modal shift from car to rail in the area. Though the consideration of future residential development proposals may well include such factors, I do not see that as part of the justification for the policy, and the supporting paragraph 6.29 should not be amended to imply that it is.

Recommendation

4.3 I recommend that no modification be made to the local plan.

5. Policy T01 - T01(3) and Paragraphs 6.30-6.33 – Rail passenger services and facilities – Charfield Station

Objections

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**Issues**

- Should Charfield Station be deleted from the plan in order to avoid intensifying the use of the road network and undermining Charfield as a community?
- Should the plan recognise the greater certainty that new residential development would bring to the proposal for Charfield Station?
- Should an alternative site for Charfield Station be identified?

**Reasoning and conclusions**

5.1 The 1991 census indicated that over 300 residents in Charfield ward worked in Bristol and the North Fringe. Subsequent information indicated that most people commuted in private cars. This may well be reflected to a different extent in other, neighbouring wards, including over the district border. The provision of an attractive rail service therefore has the potential to achieve a significant saving in daily car journeys from the wider area. However, only the assessments referred to in paragraph 6.33 will show whether the services which could be provided would in practice be attractive enough to achieve that potential, bearing in mind such factors as competition from the nearby Junction 14 of the M5 with its informal park-and-share arrangements. Those assessments should also be able to show whether so much additional traffic would be generated on the Class 2 highways in the area as to be harmful to living conditions and highway safety.

5.2 Some objectors believe that residential development allocation in Charfield should be made in the present plan, partly on the grounds that it would generate contributions towards the cost of the station or otherwise facilitate its provision. I have dealt with the question of housing allocations in items 9 to 14 in chapter 8a of my report, where I do not support the identification of sites for more housing in the village. However, I note objectors' concerns that, in the longer term, a station could add weight in support of renewed proposals on a scale that would swamp the existing community. Though this would be considered in the setting of future policies, the present indications are that any service made possible by a station at Charfield would be limited by, amongst other things, the need to provide fast and reliable through trains. The additional sustainability of Charfield as a residential area would thus be equally limited. To my mind, the risk that future policies may support large-scale development at Charfield is not so great as to justify denying the existing communities the potential benefits of protecting the site of a new rail station while the paragraph 6.33 assessments are undertaken.

5.3 The identified site for the station does appear somewhat confined, but I understand that the Council consider that parking spaces would be sufficient, based on the assumption that most users would either walk to the station or use good bus links from areas such as Wotton under Edge. The Council has investigated other sites and found them to be less suitable than the proposed allocation. On behalf of MJ Fews, the occupiers of the adjoining land, a more restricted site was put forward. This would accommodate far fewer vehicles. Whilst this would allow for the possible expansion of the existing business it would, in my view, inhibit the provision of a reasonable area for car parking and undermine the intention of
encouraging people to use the station. It would be wrong to provide for a station here and not to provide a reasonable degree of car parking to serve it. If a restricted site were provided, then travellers would have to rely on using the nearby streets to park their cars. That would be unsatisfactory. Having regard also to the information provided on the use of the Cam and Dursley station, I am satisfied that the area being safeguarded for a car park is of an appropriate size and should not be reduced in its capacity. As a result, I am content with the site identified on the Proposals Map.

5.4 The Council has proposed a change (PC194A) to paragraph 6.33, which I agree should be made in order to reflect the current position of the proposal.

5.5 The last objection has been withdrawn following changes made in the revised deposit draft plan in respect of which I am recommending no further modification. Issues raised about matters such as priorities for investment in infrastructure are not matters for the local plan.

Recommendation

5.6 I recommend that the local plan be modified in accordance with PC 194A.

6. Policy T01 - Paragraphs 6.34-6.37A – Rail passenger services and facilities – Rail based transport interchanges and freight line corridors

Objections

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Issues

Are the references to the freight line corridors sufficiently relevant to land use planning to warrant their inclusion in the plan and, if so, should they form part of a statement of wider-ranging public transport proposals?

Should the plan defer the release of development land at Northfield until the freight line corridor study is complete and funding for the implementation of its findings is in place?

Reasoning and conclusions

6.1 Paragraph 6.37A has been included in the revised deposit draft in substitution for paragraphs 6.37 and 6.38. The Council has proposed that paragraph 6.37A be changed (PC 231) to state the current position, following the completion of the Rail Routes Study and the instigation of further investigations by the Council and other bodies, including the Strategic Rail Authority. The change thus also meets the objections to the implied involvement of North Somerset Council and to the failure to acknowledge sufficiently the need to consult with the Strategic Rail Authority. The paragraph amplifies how the Council, in this case in concert with Bristol City Council, is seeking to promote more sustainable transport choices
through the complementary means of land use planning and the strategic enhancement of
existing resources. Its inclusion therefore assists understanding and improves the clarity of
the plan. The format of the plan is that, following the overarching statements of the
Council's aims, objectives and strategy, policies and supporting information relevant to each
component or transport mode are taken in turn. On this basis, the statement in paragraph
6.37A is correctly located in the section dealing with heavy rail.

6.2 I deal in more detail with objections to the allocation of the mixed development site at
Northfield in chapter 8. In particular, Policy M1 requires a transport assessment in support
of a planning application for the site. The supporting paragraphs anticipate only a possible,
part reliance on heavy rail, though definite proposals are a matter for developers of the site.
I see no reason why there should be a commitment in paragraph 6.37A to make release of
the Northfield site dependent on the outcome of the rail study since the viability of the site's
transport assessment will be a matter for the Council to decide, during the development
control process, with regard to the infrastructure already in place, committed or requiring
funding.

Recommendation

6.3 I recommend that the local plan be modified in accordance with PC231.

7. Policy T02 and Paragraphs 6.39-6.40 – Retention of rail track beds and
associated land for future public transport/rail freight use

Objections

| 283/030  | Government Office for the South West | T02 6.39 |
| 431/013  | Friends of the Earth              | T02    |

Support

| 2/002   | J W Graham                        | T02 |
| 51/003  | Bristol Rugby Club Ltd            | T02 |
| 435/009 | Bristol City Council              | T02 |

Issues

Should specific routes and land that the plan intends to safeguard be shown on the Proposals
Map?

Should the plan give greater priority to the use of rail track beds as cycleways?

Reasoning and conclusions

7.1 From the evidence provided, especially in relation to original objections concerning the
omission of Henbury and Filton Airfield Stations from policy T1, it appears that the Council's
interpretation of policy T2 is that is seeks to protect from development all that land formerly
or still in use as railway track beds or other railway-associated use. This intention reflects
the first three sentences of paragraph 5.23 of PPG12. I am not satisfied that the text of the
policy conveys the intention unambiguously. It could equally well be interpreted as
preventing any development which would prejudice the transport use of railway land,
whether or not the development would itself be on former railway land. Such an
interpretation would cause significant uncertainty and lack of clarity about the status of all
land in the vicinity of railway land. This could be overcome only by positively identifying
those sites to which the protection would apply, as recommended in the last sentence of
paragraph 5.23 and in accordance with the requirements of paragraphs 5.17 and 5.22 of
PPG12. The policy should be re-worded to avoid the ambiguity.
7.2  The policy, thus clarified, provides the protection required in principle for land which is identifiable from readily available knowledge or records, without the undue blight implications of identifying sites in the absence of sufficiently detailed and financed transport proposals.

7.3  Rail track beds have several qualities, such as reasonably direct routeing between locations and easy gradients, which make them particularly suitable as cycleways, especially for commuting. If a cycleway were once established on a rail bed and a case were later made for its exclusive use for public transport or rail freight, it might be costly to re-route the cycleway to an equally commodious route. However, it seems to me that, where the economic and environmental benefits justify a conversion to a cycleway, such a proposal should not be ruled out on the basis that a public transport or freight use may come forward in the future. The preferred option would be to accept that the cycleway may be a medium-term use only and that, if the benefits fail to outweigh the costs of its longer-term retention or relocation, it should be shut down. If the route were used for public transport, it is of course likely that cycles could at least be carried over the route anyway. In practical terms, I see little value in distinguishing between cycle use and pedestrian and equestrian use and I consider that the policy should be modified accordingly.

Recommendation

7.4  I recommend that the local plan be modified by amending policy T2 to read:

"Development of railway track beds and associated land which would prejudice their continuing use or reuse for public transport provision or rail freight facilities will not be permitted.

Cycleways, footpaths and horseriding routes will be permitted on former railway track beds and associated land either where they could coexist with public transport and/or rail freight uses, or temporarily until the reuse of the land for those other transport purposes is justified."

8.  Paragraphs 6.41-6.45 – Freight Transport

Objections

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Issues

Should the plan include a policy whose objective would be the diversion of road freight traffic away from unsuitable roads?
Reasoning and conclusions

8.1 The plan refers to the freight strategy of the Local Transport Plan, which includes the identification of a strategic HGV network, and it is to be expected that reviews and new editions of that document will continue to identify and evaluate areas for action to the benefit of both the economy and the environment, including physical measures and signage. There are no matters of which I am aware, arising from this strategy, for which a policy should be included in the local plan. As far as new development is concerned, local plan policies already require that generated traffic should not cause unacceptable harm to residential or other environmentally sensitive areas. This is also a significant issue in considering the plan's employment and residential allocations. A specific policy is not therefore needed. The Council has proposed a change (PC135) to paragraph 6.161, supporting policy T12 and I agree that this gives a more unqualified emphasis to the plan's intentions.

8.2 The parking of lorries in or near residential areas, either overnight or whilst waiting to make a delivery, can have a substantially adverse effect on the living conditions of residents. Elsewhere, it may give rise to road safety issues. The Council recognises this in part as a matter to be dealt with under the freight strategy of the Local Transport Plan, but no proposal has yet been brought forward to which a local plan policy could refer. However, this is an important matter for people who are likely to be affected and I agree that the proposed additional paragraph (PC133), which has led to the conditional withdrawal of some of the objections, should be included in the plan's summary of the freight strategy. The need for on-site waiting facilities is included at criterion G of policy T12.

8.3 The existing signage from Yate to the motorway network is via the A432, either eastwards to A46 and thus to M4 at junction 18, or south-westwards to A4174 and thus to M32 and M4 at junction 19, with the option to join M5 at junction 15. This accords with the Local Transport Plan's aim of encouraging traffic to use strategic routes. Historically, investigations have been undertaken into a more direct connection between Yate and M5, or at least A38 at Rudgeway. Such a connection would seek to relieve the settlements astride B4059 (including Latteridge) and B4058/B4509 (including Rangeworthy, Cromhall and Tortworth) of the impact of traffic generally, and lorry traffic in particular, which seeks a more direct connection to M5, avoiding A4174. Modelling has shown, however, that such a route may well attract "new" traffic from the existing strategic routes. Further investigation is clearly needed into the options of either adding further capacity restraints and/or road safety measures to the existing roads, or programming new road improvement and/or construction. The selection of a preferred option, taking into account Government policy on road building, is a matter to be progressed by consultations through the Local Transport Plan process rather than through statements of intent in the local plan, which I therefore do not consider should be modified to include references to the issue at this time.

8.4 Paragraph 6.41 has been amended in the revised deposit draft to reflect the Council's current freight strategy. Nevertheless, the revised deposit draft version still refers to the importance of the rail network in the first bullet point of the strategy summary and the second bullet point of the objectives summary. Paragraph 6.41A refines the previous reference to a freight quality partnership, involving the rail industry, and the subsequent paragraphs 6.42 to 6.43A continue the emphasis on the importance of rail freight, with the prospect of positive support in the local plan for any identified rail transfer facility. This,
combined with the Local Transport Plan, appears to me to give as much encouragement as is reasonably possible to the development of rail freight, short of an additional "upper case" policy. As no definite proposals are before me, I am not able to recommend any site specific policy, nor is any information available which would enable me to form a recommendation on a criteria-based policy. In the absence of either, the plan's statements of support and the protection of land afforded by policy T2 provides a reasonable mechanism by which proposals could be forwarded once they are identified.

8.5 The position of freight facilities in Avonmouth has moved on since the objection was made to the failure of the plan to refer to them. The Council has suggested that it could update paragraph 6.43 to give the most up-to-date picture at the Proposed Modifications stage, taking account of the City's development at the Port of Bristol, and I agree that this would be the most helpful way for a reference to be included in the plan. Accordingly, I make no formal recommendation here. The Westerleigh railhead is not under the control of the Council, but it is included amongst the list of rail facilities in paragraph 6.43 as a resource recognised by the freight strategy of the Local Transport Plan. Insofar as its future use is a matter for the Council, it should be addressed through that strategy rather than any modification to the local plan, particularly since no land use implication has been identified.

Recommendation

8.6 I recommend that the local plan be modified in accordance with PC133

9. Policy T03, Paragraphs 6.46–6.58 and Figures 6.1 & 6.2 - Rapid transit route and rapid transit based park and ride

Objections

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Support

51/004 Bristol Rugby Club Ltd T03 6.58
267/034 Arlington Property Developments Ltd T03
344/008 Sydney Freed Holdings & J S Bloor (Newbury) Ltd T03 6.58
409/003 North East Thornbury Consortium - Bryant Homes Ltd, Redrow Homes (South West) Ltd, Wimpey Homes & Deeley Freed Estates Ltd T03 Fig 6.1
410/601 Environment Agency T03(1)
435/601 Bristol City Council T03(1)
435/602 Bristol City Council 6.47
435/603 Bristol City Council t03(10 PC128 Prop Map
449/601 UWE T03(1)
522/601 Mr Gill T03(1)
208/601 Mrs Clayton T03(1)
370/601 Mr Ball T03(1)
495/602 Mr and Mrs Wright T03(1)

Issues

Should the plan provide for route stops within 400m of all residential areas served?

Should the park and ride site either be omitted from the plan or should a larger area be provided?

Should land for further sections of and extension to the system be safeguarded for implementation in the longer term?

Reasoning and conclusions

9.1 I have commented elsewhere on the position of the rapid transit system with reference to paragraph 2.17A. There have been substantial alterations to the status of proposals for the rapid transit system, south and north of Parkway, since the publication of the revised deposit draft. The first and second proposed changes and PC164 reflect the position up to the issue of the latter proposed change in December 2003. In particular, a proposed change (PC110) allows for the system to terminate at Cribbs Causeway, supported by a revise figure 6.2 (PC125), and I consider that, if the system is to go ahead, this will continue to be the case. However, it is clear from responses to queries raised in the course of the inquiry that these proposed changes are otherwise far from being the end of the story. Uncertainty persists as to what system, if indeed any, will be used either on Line 1, Bristol City's proposals south of Parkway, or on the alternative system being studied by the Council for the route from Parkway to Cribbs Causeway (ARTS). The Council has suggested that the position on both will be clear by the proposed modifications stage.

9.2 Nevertheless, even with such uncertainty, a system following the designated corridor is highly likely to make an important contribution towards meeting the future transportation needs of the area. Bearing in mind the guidance in PPG12 and PPS12, and the importance of upgrading the public transport network in this area I believe that the corridor and land for ancillary facilities should continue to be protected. In this way, pending the outcome of further considerations, the potential route will be available to form the basis of a future system, which in the present uncertainty should be referred to simply as a public transport system. The supporting text to the policy should be redrafted by the Council to reflect the position at the time the plan is adopted.

9.3 I have considered all the objections made at various stages against the revised deposit draft and the proposed changes to date. Many have either been dealt with adequately by alterations in the revised deposit draft and proposed changes or are no longer relevant in view of those alterations. Others raise issues that can only be dealt with once the position on the two sections of the system is clear. The issues I have identified above are those which I believe are highly likely to persist whatever the outcome, and I consider it may help objectors and Council alike if I give my response to these.
9.4 The rapid transit system, in whatever form it takes, would be complementary to rather than competitive with other transport modes. Routes closer to residences and with more frequent stops would detract from the rapidity of service that is fundamental to the system and duplicate a function best provided by bus services. Whether bus services can be arranged to provide a means of transfer from the immediate locality of houses to the rapid transit stops is a matter the Council may wish to consider within a review of its bus strategy, following the outcome of the ARTS study.

9.5 I am aware that there is some evidence from elsewhere that park and ride facilities encourage car journeys from longer distances that would not otherwise be made. I do not have evidence as to whether that would be the case here, but it seems to me highly likely that the harm from any such effect in the case of the rapid transit system would be heavily outweighed by the benefits of the diversion of journeys, which would otherwise be undertaken by private car through the congested highway network in the North Fringe, onto the rapid transit system. The Council has examined the likely demand for park and ride facilities and concluded that, as separate measures will be provided for buses not forming part of the system, the site is of adequate size. I have no reason to come to a different conclusion.

9.6 Given the uncertainty surrounding the primary routes from Bristol City to Parkway and from Parkway to the terminus in South Gloucestershire, there is no firmness or reasonable degree of certainty which can be attached to further proposals, such as those which might serve Emersons Green and Yate, and it appears that the proposals are not even sufficiently advanced for an area to be defined over which a safeguarding policy may be applied. The plan would therefore conflict with national policy were it to include any such definitions.

Recommendation

9.7 I recommend that the local plan be modified:

i) in accordance with PC110 and PC125

ii) by, throughout the text of policy T3, deleting "rapid transit" and substituting "public transport"

iii) amending the supporting text, and Proposals Map as necessary, to reflect the current position of the system at the time the plan is adopted.

10. Policy T04, Paragraphs 6.60-6.73A and Figure 6.2A - Bus priority measures and car sharing

Objections

144/006 J J Gallagher Ltd, Heron Land Development Ltd, T04
299/026 Westerleigh Parish Council T04 6.60, 6.62
300/501 Dodington Parish Council T04 6.60A
300/502 Dodington Parish Council T04 Fig 6.2A
349/501 Hewlett-Packard Ltd T04 6.68A
409/036 North East Thornbury Consortium-Bryant Home Ltd, Redrow Homes (South West) T04
430/013 Cala Homes (South) Ltd T04 6.60-6.61
438/011 Mr L Smith T04 6.60-6.61, Fig 6.2
446/001 First City Line T04
446/002 First City Line T04
446/003 First City Line T04
449/006 University of the West of England T04
449/007 University of the West of England T04
Should the plan be amended to clarify the status and location of the bus partnership routes?
Should the Romney Avenue Bus Link be omitted as unlikely to proceed within the plan period?
Should the plan include a bus priority scheme within Bradley Stoke?

Reasoning and conclusions

10.1 The bus partnership routes are being developed as part of the Council's bus strategy through the Local Transport Plan. Progress on route definition and implementation is progressing during the local plan process. This includes decisions on whether bus only lanes or HOV lanes are the most effective solution in each case. It will assist in the understanding of the plan if it is amended to set out the position at the time of its adoption. A series of changes proposed by the Council (PCs 44-50, 171, 172, 172A and 172B) bring the plan into line with the Local Transport Plan, express the commitment to ensure the adopted plan is up to date and, together with changes already incorporated into the revised deposit draft, provide the clarification sought by the objectors. I recommend the changes accordingly.

10.2 Paragraph 6.68A acknowledges the need for greater definition of the Romney Avenue Bus Link. Nonetheless, I have no evidence that there are substantial constraints on the scheme's proceeding within the plan period. Indeed, a representation has been made by the present owner of much of the land needed expressing willingness to work with the relevant authorities to this end. In the light of that and my recommendation elsewhere in relation to the development of Wallscourt Farm, there appears to me to be a very high probability that the bus link will go ahead within the plan period. There is therefore no justification for deleting references to the scheme from the plan.

10.3 There is no evidence that there is sufficient congestion on the relevant route within Bradley Stoke to justify the inclusion of bus priority measure in the plan.

10.4 Other objections refer to schemes that have now been completed and so deleted from the plan.

Recommendation

10.5 I recommend that the local plan be modified in accordance with PCs44, 45, 46, 47, 48, 49, 50, 105, 171, 172, 172A and 172B.
11. Paragraphs 6.78-6.90 - Multi-modal interchange strategy

Objections

49/006 Crest Nicholson Properties Ltd and ICP Properties Ltd T04 6.78-6.86
52/003 The Tortworth Estate Company T04 6.78-6.90
52/051 The Tortworth Estate Company T04 6.89
130/005 Marks & Spencer Plc T04 6.81Fig 6.3
266/010 MEPC Ltd and The Charterhouse Shopping Centre Fund 2 T04 6.78-6.90
283/031 Government Office for the South West T04 6.78-6.86
283/032 Government Office for the South West T04 6.087-6.90
318/002 Mr D W Hitchings T04 6.78-6.86
345/003 CPRE, Avonside Transport Campaign Group T04
348/020 ICI Corporate Real Estate T04 6.78-6.90
374/005 Thornbury Town Council T04 6.81
430/012 Cala Homes (South) Ltd T04 6.78-6.90
430/031 Cala Homes (South) Ltd. T04 6.78
435/017 Bristol City Council T04 6.78
438/009 Mr L Smith T04 6.78
438/010 Mr L Smith T04 6.78-6.90
449/009 University of the West of England T04 6.79

Support

180/24 Jt Parishes Consultative Committee T4 6.79
181/026 Yate Sodbury Liberal Democrats T04 6.79
182/026 Yate Town Council T04 6.79
194/003 Countryside Strategic Projects Plc T04 6.78-6.86
253/002 Tortworth Parish Meeting T04 6.78
297/005 Railtrack Plc T04 6.78A
300/024 Dodington Parish Council T04 6.79
344/510 Sydney Freed Holdings & J S Bloor (Newbury) Ltd T04 6.89
408/006 P & A Bennett T04
409/035 North East Thornbury Consortium-Bryant Home Ltd, T04 Redrow Homes (South West)
438/502 Mr L Smith T01 6.78A
511/508 Crest Nicholson Properties Ltd & Harcourt Developments T04 6.78A
515/506 Community Action T04

Issues

Should the plan include policies for the provision of multi-modal interchanges and park & ride sites, and if so should these include for the future use of sites as car dependency decreases?

Should Figures 6.2A and 6.3 be merged to better emphasise the plan’s integrated approach to transport provision?

Should the plan include specific allocations for one or more park & ride sites?

Should the plan refer to the inclusion of Frampton Cotterell, with a multi-modal interchange, on the Yate - City Centre corridor?

Does the status of the multi-modal interchange at Yate need clarification?

Is the reference in Figure 6.3 to “potential surplus parking” at Cribbs Causeway and Thornbury realistic?

Reasoning and conclusions

11.1 The provision of multi-modal interchanges (MMIs) is a key element in the transportation strategy and will come increasingly to the fore as the major sites are designed and developed during the plan period. In the present absence of detailed, site specific proposals, the plan should include a criteria-based policy which will enable the facilities to be provided in a consistent and structured way. The Council proposed that the plan be changed (PC184) to include such a policy, then designated as policy T4A, with supporting text, partly replacing or amending revised deposit draft paragraphs 6.78-6.85, and a revised Figure 6.3. The multi-modal interchange strategy involves the provision of sites which serve a wider
range of users than just those who wish to park their cars in order to continue their journeys by public transport. To encourage people to commence their journeys on foot or cycle and to minimise the length of the car-based part of trips, the interchanges will be located so as to intercept people close to the origins of their journey.

11.2 Nonetheless, there may well be a continuing identified need to provide park and ride (P&R) sites, especially for those coming from further afield. These will need careful siting if they are to contribute to the relief of congestion in their feeder roads as well as in their destination zones. It is especially important that they should complement rather than compete with the network of multi-modal interchanges, since, by and large, local trips to P&R will be longer than those to MMIs, thus being less sustainable and possibly contributing to congestion. The original proposed change included a second new policy, T4B, and supporting paragraphs. It also deleted paragraphs 6.87-6.89 in the revised deposit draft, since the strategic interchange and local access hubs are now complete and no further funding is available from the source promoting them. This does not preclude the inclusion of similar facilities in the planning of developments such as the provision of a railway station at Charfield.

11.3 An alternative change is proposed by the Council in Document SGC/242.2, which combines policies T4A and T4B and their supporting text into a single policy, T4C, with supporting text. In principle, the emphasis of the prime purpose of the two types of facility seems sufficiently different that separate policies may be justified. However, in practice the wording of the two different policies is in fact very similar and perhaps reflects a more general principle that, though the two types of site may be different in size, type of location and emphasis, and indeed sponsoring authority, both have the same broad aim and will be so perceived by the public. I therefore recommend PC184, modified in accordance with SGC/242.2 to introduce a single new policy, T4C with its supporting text, and shall use this rather than the revised deposit draft text which it replaces as the basis of my further considerations. There is a certain amount of repetition in the various criteria, and the Council may wish to consider whether some amendments to deal with this would be appropriate.

11.4 Elsewhere in the plan, criteria based policies refer to proposals in the plural. In that context, the use of the singular in policy T4C could be read as implying that only one facility would be allowed during the plan period. Though Council has said that this is not its intention, the plan ought to be unambiguous in itself. The wording of the policy should be changed accordingly. I appreciate that the words in parentheses in the first sentence of the policy seek to give example of the uses to which the MMI/P&R may be put, but it seems to me unfortunate that each one involves arriving at the site in a car, though other possibilities are covered in paragraph 6.77A. However, I make no formal recommendation in this latter respect.

11.5 I am content that the criterion A should "encourage" as only such measures as the exclusion of cars from large zones can guarantee to deliver modal transfer. I also agree that criterion D is necessary to ensure that the strategy does not suffer from cases where facilities fail to deliver the expectations because buses are subject to the same congestion as cars. I see no reason why walkers and cyclists should not be included as potential users of dedicated P&R sites. If, against reasonable expectations, a problem should arise with a particular site, its non-compliance with criterion E could be subject to special consideration. Criterion F, as it stands, is where a combination of two policies falls down. The policy should allow the difference in emphasis between MMIs and P&Rs to be recognised. I see them as complementary rather than being in competition or with one being subordinate to the other. Criterion F should be the point at which some recognition that MMIs and P&Rs serve different strategic purposes is recognised. This can be achieved by altering the criterion to start, "complements or contributes to ... ".

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11.6 Should MMIs or P&Rs become redundant, either as a result of the success of policies to reduce car use or for other reasons, the future use of the land will no doubt be determined with regard to the circumstances of each individual site at that time. It would be premature and cumbersome for the policies of this plan to concern themselves with such matters.

11.7 Paragraph 6.81A refers, I believe helpfully, to particular proposals relevant to the first period of implementation of the strategy. Paragraph 6.81C explains why these proposals are not part of a site-specific policy but suggests that such a policy to cover them will be brought forward in due course. With the plan committed to an ongoing provision of sites diagrammatically identified in Figure 6.3, and apparently open to other justified proposals that meet the policy criteria, I do not see that picking out "snapshot" sites for special treatment at the time the plan is adopted is either logical or particularly helpful, especially as there is no suggestion that the land use will need safeguarding prior to a grant of planning permission. It is sufficient for all sites to meet the criteria. Paragraph 6.81C should be modified accordingly. In line with the changes I recommend to paragraph 6.19, I do not consider that reference need be made to continuing dependency on the private car in rural areas.

11.8 There would be some merit in combining Figures 6.2A and 6.3 to give a more complete visual picture of the Council’s overall strategy, complementing the text of the plan. This has to be balanced against the need for diagrams and maps to be clear and not unduly cluttered. On balance, I conclude that the latter consideration outweighs the former and that the present arrangements should be retained.

11.9 I fully appreciate the advantages to the Greater Bristol area as a whole in providing a P&R facility towards the northern end of the M32, especially one associated with a bus priority system on the M32 and the all purpose highway system beyond its southern end. It would bring substantial advantages, including improvements in journey times, in accessibility to the City centre for those travelling from well outside the conurbation and to air quality along the corridor. I note that the JRSP lends support in principle, subject to its resulting in an overall reduction in car use. It seems to me that such a facility would, to a significant extent, serve a different purpose from and not necessarily conflict with the Council’s proposed network of MMIs. However, to recommend a policy establishing the principle of a generalised location for a P&R site, such as "in the vicinity of Junction 1 of the M32", I should need to be fully satisfied that it would be capable of meeting the criteria of the plan, and especially that (a) it would definitely be in South Gloucestershire and (b) it would not add to congestion problems in South Gloucestershire (unless, possibly, its overall benefits to the wider area would outweigh such problems).

11.10 At the inquiry, two possible sites emerged as serious contenders: the NW quadrant of M32 Junction 1, in South Gloucestershire, and Stapleton Smallholdings, in Bristol City. The latter site would have the more limited capacity and may well require a new junction to be formed on M32 giving direct access to the site. Such a junction would be unusually close to Junction 1, but it is conceivable that this may be less of a problem if it were dedicated to P&R traffic and available for southbound-off and northbound-on traffic only. The junction spacing may prejudice the road's continuing status as a Special Road after possible de-trunking, and that could be an important consideration to be taken into account. The allocation of this site would not, of course, be a matter for South Gloucestershire Council.

11.11 As to the former site, it emerged at the inquiry that it could result in an additional 815 vehicles per hour leaving the M32 in the morning peak period, using the southbound-off slip road where congestion already threatens to back up to the M4 westbound. Without firm evidence, I am not persuaded that further alterations to the signals or widening of the slip road itself would provide sufficient capacity to overcome both the existing problem and carry the additional imposed load. It seems to me, from the detailed figures provided in the objector’s final submission, that 1000 vehicles or more would seek to leave in the evening
peak hour, using a new signalised junction to turn east onto the presently-congested A4174 and then entering the roundabout to access the northbound slip road onto the M32. Whether or not the robust assessment required by PPG13 paragraph 61 is necessary at this stage, at the least evidence, based on rigorous technical analysis, should provide an acceptable level of certainty that the network would be able to accommodate the additional peak period traffic. I do not find the evidence goes far enough in this respect. I am therefore unable to recommend a policy identifying this site. The criteria-based policy I do recommend will usefully add to the plan policies against which a more detailed and rigorously-justified proposal may be considered in due course. In the mean time, the site derives protection from alternative development in great measure from its location within the Green Belt.

11.12 Other proposals for park and ride sites put forward by objectors either duplicate the function of an M32 site or lack the details required to ensure their compatibility with the plan. For the plan to include such sites without full justification would unnecessarily prejudice the consideration of detailed proposals, either at those sites or elsewhere, which may be put forward in the future.

11.13 The definition of the Yate to Bristol multi-modal route is not sufficiently complete for the inclusion of intermediate settlements in the route description. Further such detail will be available as the scheme is progressed through the Local Transport Plan. I have no evidence that the likely level of local usage is high enough to warrant the provision of a multi-modal interchange at Frampton Cotterell. I have dealt under Policy T1 with the status of land for a possible future railway station, which would no doubt form part of a multi-modal interchange, should the demand arise in this locality. In all these circumstances, I see no need to modify the plan.

11.14 From the information I have available, work by the Council's consultants has not yet reached the stage where more detailed information can be included in the plan about the Yate MMI. This point is covered in paragraph 6.81C, as I recommend it should be modified, while policy T4C sets out the criteria which will inform a decision about the Yate site. I consider this is sufficient and that no further modification is required.

11.15 Parking at Thornbury seems to me to be reasonably fully committed to the needs of people visiting the town itself. At Cribbs Causeway there is a large area given over to parking for visitors to the centre, but again there is no indication that this exceeds the peak demand for that purpose. For the plan to include a reference to "potential surplus parking" at either location implies that some capacity study has been undertaken to justify such an assertion, which apparently it has not. However, all such references are in any case omitted from the revised figure 6.3 forming part of PC184.

Recommendation

11.16 I recommend that the local plan be modified in accordance with PCs 184A option 1, 184B, 184C, 184D, 184E option 1, 184F, 184G, 184H options 1&2, 184I, 184J options 1&2, 184K, 184L, 184P, 184Q, 184R options 1&2, 184S option 1 and 184T option 1 [that is, option 1 (policy T4C to replace policies T4A and T4B) of SGC/242.2], subject to the correction of typographical errors and the following further modifications:

i) amend policy T4C to start: "Proposals for ...." with the remaining text altered to reflect this use of the plural.

ii) amend criterion F of policy T4C by adding at the beginning: "complements or"
iii) delete from paragraph 6.81C: "include these two sites in a policy and" and "as a proposal in a policy"; and add to the end of the final sentence "on the Proposals Map."

12. Policy T05, Figure 6.4 and Paragraphs 6.91-6.109 - Cycle Routes and Pedestrian Routes

Objections

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Issues

Should the plan restrict the creation of new cycle routes to those that can be accommodated within existing transport infrastructure?

Should the plan include further identified cycle routes?

Does the plan give sufficient support to routes which cross local authority boundaries?

Should the plan allow flexibility in the protection of cycle routes affected by development proposals?

Should the plan include a policy to light cycleways in the interests of user safety?

Should the plan include criteria for the provision of new routes which would protect the interests of horseriders?

Should the plan give first preference to off-road cycle paths, followed by shared cycle/pedestrian off-road routes with on-road cycle markings being the last preference for positive provision?
Reasoning and conclusions

12.1 Policy T2 provides for the use of rail track beds for cycleways and I recommend that that policy be amended to increase its scope. Paragraph 6.96 rehearses the Council's Cycling Strategy, which favours the improvement of cycle safety on existing roads wherever this is possible, in preference to segregation. However, where a significant demand is identified which can best be met, in terms of economics, utility/attractiveness and environmental impact, by a route wholly or partly separate from any other past or present transport route, I consider the designation of the requisite land use by the plan is justified.

12.2 In general terms, the Proposals Map and the schedule in Figure 6.4 identify only those joint use cycle/pedestrian routes requiring land, which are not already in place but which have been identified, agreed and are scheduled for implementation within the plan period. It is not for the plan to provide a definitive map of the cycle route network in the area. The implementation of cycle routes within existing highways is a matter for consideration alongside other transportation schemes and, if included in the plan for information purposes, could diminish its clarity. In some cases where land take is involved, consultations, including with the Joint Parishes Cycleway Group, and the subsequent procedures are ongoing, so that more proposals could qualify for inclusion as time goes on. Other routes might well be implemented and so will no longer need to be included. Where I have no evidence on the present position, I can recommend no modifications. I assume the Council will ensure that an up-to-date picture is presented in the plan at the time of adoption.

12.3 I do have evidence on a number of possible schemes. For Alveston – Thornbury, a definitive alignment has not been identified, but it is already included in a footnote to the schedule of schemes. The likely demand for a route linking Alveston, Old Down and Olveston has been assessed and found insufficient to warrant the expenditure required. The route following the A38 is under consideration, but is likely to be located within the existing highway. Old Sodbury and Chipping Sodbury routes are designated within the existing highway (which includes the verge), and are not joint use. I understand that routes north-east of Morton Way, Thornbury and north of Yate would be justified only in the event of possible future development, in which circumstances adequate provision is made in the plan at policies D1 and T12, and perhaps the fourth clause of policy T5. None of these schemes therefore has the present status which would justify my making a recommendation that the plan should be modified to include it.

12.4 I have no doubt that cycle routes can be identified that cross local authority boundaries. Indeed, where boundaries pass between settlements which have an historic affinity, it would be surprising if it were not so. The objector on the third issue has pointed out as an example the close educational, employment and other links between Charfield and Wotton-under-Edge. However, no proposal, either in this geographical area or elsewhere, has the present status necessary for it to be included in the plan. A policy expressing general support for schemes, either explicitly or implicitly, would not comply with good practice. As an alternative to such a policy, Paragraph 6.108A adequately meets the need for the plan to express the Council's support in principle for proposals which may come forward, and the proposed change (PC169) sets out the reasoning behind that support and sets a general framework for the acceptability of a proposal. I agree that, with this change, the plan would recognise the importance of and give adequate support to co-operation between authorities in this respect.

12.5 The Council has proposed a change (PC168) to paragraph 6.105, stating that the second clause of the policy allows for a route to be diverted to an alternative of equivalent convenience, attractiveness and safety. Nevertheless, I consider that the policy itself lacks the clarity it ought to have. The wording of the second clause sufficiently resembles, for instance, the first clause of policy T2 for comparisons to be drawn between the two, yet I am not aware that the Council would see the latter as incorporating any flexibility over the
complete protection of certain land from development. If the Council does see the two policies operating in a different way, that should be made clear by different wording within the policy itself, and I shall recommend accordingly. The amendment would also overcome an objection to the possible conflict between a current development proposal and a designated route at Warmley.

12.6 The safety of users of all elements of the highway network is important, and people who habitually travel in hours of darkness, especially in the winter months, will be more likely to cycle if their way is adequately lit. On the other hand, light pollution is a matter of increasing concern, not just for its effects on flora and fauna, but also and most especially for its visual impact on the surroundings. Paragraph 6.95 refers to one of the ways by which the primary objective of the Cycling Strategy will be met as "reducing dangers to cyclists and increasing personal security as a means of encouraging more cycling". As for any other public thoroughfare, whether this would necessitate or justify the lighting of any particular cycleway is a matter to be determined on the individual circumstances of the case. I therefore conclude that the present reference to the issue in the plan is sufficient, so that a plan policy on the subject would not be justified.

12.7 The plan includes measures to protect horseriding routes at policy LC12. It notes the potential for conflict between horseriders and other highway users at paragraph 10.57, where the Council's commitment to continue to address the issue is expressed. Schemes for the provision of new routes within or separately from existing highways, or indeed for alterations to the usage of existing routes, are subject to consultation in the normal course of events. Such consultations and the resolution through the design process of identified problems and other issues, including the possible joint use of routes by horseriders, cyclists and pedestrians, are matters for the management of each project rather than for the local plan.

12.8 Objections 180/503, 181/504, 182/504 and 254/503 have been withdrawn, having been resolved by the introduction of a proposed change (PC52) to paragraph 6.99. This would add a reference to the involvement of the Joint Parishes Cycleways Group and the Safer Routes to Schools Project in the development of route, to which I refer in my discussion of the second issue above. The change would provide ongoing credit to those groups in developing the strategy and usefully complements the contents of the rest of the paragraph.

12.9 The plan draws its order of preference for cycle route provision from the Council's Cycling Strategy. This states that design criteria adopt the hierarchical approach given in the Government-approved document, *Cycle-friendly Infrastructure: Guidelines for Planning and Design* (1996), which advocates measures to make the use of existing roads safe and convenient for cyclists in preference to segregation. By and large, roads, by their nature, directly serve frontage development and give users more flexibility than segregated cycleways to choose routes which best suit their various needs for any particular journey. Segregated cycleways may also be seen in some cases as relatively unpopulated, so offering less personal security. To change the order of preference would be to bring the Strategy and the plan into conflict with national policy.

12.10 In response to objection 431/18 of the deposit draft, subsequently withdrawn, the Council resolved, amongst other things, to amend the heading above paragraph 6.99 to read "Segregated Routes". The revised deposit draft does not fully follow the resolution and so does not reflect changes made in the subsequent paragraph. I suggest that the Council should consider whether a further correction to the heading is required.

12.11 The adequacy of consultations undertaken by the Council in drafting the plan and the alleged poor standard of maintenance of an existing cycle route are not matters on which I may make any recommendation, since they are matters unrelated to my consideration of
possible, proper changes to the local plan. However, I am aware that the objectors concerned received a response from the Council on both these matters during the relevant hearing sessions.

**Recommendation**

**12.12 I recommend that the local plan be modified**

i) in accordance with PCs 52, 168 and 169

ii) by adding to the end of the second clause of policy T5: ":, unless an alternative route of acceptably similar function, convenience, attractiveness and/or safety is provided"

**13. Policy T06 and Paragraphs 6.113-6.115 – Cycle parking**

**Objections**

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**Issues**

Should the plan clarify whether the policy applies to changes of use as well as to new buildings?

Should the standards set by the plan be based on needs defined in accordance with established local circumstances?

Should the plan include a requirement to provide ancillary facilities, such as security measures and changing/showering facilities where relevant to the use of the development?

**Reasoning and conclusions**

13.1 The plan includes a glossary of terms in which "development" is defined in accordance with the Town and Country Planning Act 1990. It is not necessary to iterate the definition on each occasion when the term is used in policies.

13.2 Existing levels of cycle usage are affected by the shortcomings which the Council's Cycling Strategy and the plan are seeking to correct. The Strategy points out the higher levels of cycling usage that have been achieved where latent demand has been released through provisions for cycling. The provisions identified by the Strategy, together with other methods of encouragement, should also create new demand. In my view therefore, cycling is at the stage where existing demand is a poor predictor of the modal transfer from cars that could be achieved and that other bases for standards are needed if the targets of the Cycling Strategy are to be met.

13.3 The parking standards in the plan are said by the Council to reflect those used with success elsewhere and have been accepted by consultees of the draft Cycling Strategy. I
consider this justifies their use as a South Gloucestershire-wide base level for this plan, subject to my reservation about dwellings below. Further refinement may be possible but that can only follow more experience. The additional paragraph 6.113A of the revised deposit draft emphasises that the standards are generally minima, so that there is no bar to higher provision where necessary. Equally, the paragraph recognises that, given satisfactory justification, a lower standard may be acceptable.

13.4 This does not, however, fully deal with a concern which remains about standards for dwellings. There is a need for cycle parking at both ends of a journey if cycle use is to be encouraged at all, so provision should be made at dwellings to at least the standards of Figure 6.5. The revised deposit draft includes an amendment to Figure 6.5 that only garages of sufficient size should be counted towards cycle parking at dwellings. This will assist in partially overcoming any shortfall in domestic provision that otherwise might arise. However, there is still a substantial discrepancy between the residential standards for car parking and those for cycle parking. Even though the one is a maximum and the other a minimum, this discrepancy seems to me to express to a significant degree an expectation of, and thus the encouragement of a preference for car use over cycling. I conclude that the interim standard, pending modification in the light of the further experience I mention in the previous paragraph, should be raised for dwellings of more than one bedroom, to two spaces per unit. I do not consider a higher level for four bedroom dwellings is justified at this stage, since such properties may well have garaging able to provide sufficient flexibility to accommodate more cycles if required.

13.5 I consider that objection to the lack of reference to the need for facilities such as changing rooms and showers have been covered adequately by the addition of paragraph 6.115A. The plan already points out, at paragraph 6.115, the need for adequate security, either by good natural surveillance or, in town centres, by existing CCTV systems. In accordance with the importance placed on security by the Council’s Cycling Strategy, I consider that the plan should also encourage the use of CCTV elsewhere if natural surveillance is not possible.

Recommendation

13.6 I recommend that the local plan be modified:

i) by amending Figure 6.5 to subdivide each of the C3 uses into "one bedspace/bedroom" and "two or more bedrooms", with two secure, undercover spaces to be provided for each of the two or more bedroom dwelling types.

ii) by amending the third bullet point of paragraph 6.115 to read: "Security - cycle parking should be situated where there is good natural surveillance. Otherwise it should be observed by CCTV where this is practicable. In town centres, parking should be provided in locations observed by CCTV."

14. Policy T07 and Paragraphs 6.116-6.130 - Parking standards

Objections

180/028 Joint Parishes Consultative Committee T07
181/030 Yate Sodbury Liberal Democrats T07
182/030 Yate Town Council T07
203/024 Frampton Cotterell Parish Council T07
221/006 Slough Estates Plc T07
254/028 Sodbury Town Council T07
267/002 Arlington Property Developments Ltd T07
267/004 Arlington Property Developments Ltd T07 6.116
Should the plan include additional means of reducing traffic, such as encouraging walking and the use of flexitime working?

Should the plan confirm that its standards do not apply retrospectively to sites with existing planning permission?

Should the plan be amended to adopt a more flexible approach to parking standards, including the removal of a maximum level of parking as harmful to the future of the local economy and unworkable in practice?

Should the plan only encourage, rather than expect, provision below the maxima in the circumstances stated in the policy?

Does the plan give sufficient encouragement to car-free development?

Is the plan’s imposition of more rigorous parking standards in the North Fringe and Ememsons Green sufficiently justified?

Should the plan recognise the particular parking needs of transport interchanges?

Does the plan take sufficient account of the advantages and disadvantages of undercroft car parking?

Is it reasonable for the plan to expect the cost of on-street parking control to be borne by development?

**Reasoning and conclusions**

14.1 The plan includes measures to protect and improve facilities for pedestrians and refers to the Council’s Walking Strategy, which sets out the ways in which the authority will to continue to encourage walking through measures which lie outside the scope of the local plan. Flexitime is not a matter for the plan as such, since it is not a land use matter. However, it may form part of the Travel Plan for a development required under policy T10. I do not find any other measures that the plan could properly include, particularly in terms of setting parking standards, which would take it further than this.

14.2 Extant planning permissions cannot be changed retrospectively by the subsequent adoption of a new local plan. I see no reason to confirm this principle in the plan.
14.3 The plan’s policy to apply maximum parking standards is in accordance with PPG13, RPG10 and the JRSP. In particular, PPG13 says (at paragraph 52) that policies in development plans should set maximum levels of parking as part of a package of measures to promote sustainable transport choices and reduce the land-take for development. Where PPG13 and/or RPG10 set specific standards, these are the values now used by the plan. In this respect the revised deposit draft meets a number of objections to the deposit draft that have not been withdrawn. It would not be acceptable to set parking standards on the basis of current demands since that would encourage car dependency and discourage the provision of alternative, sometimes innovative, solutions to the problem. The plan does include a range of other measures to promote and provide sustainable transport options, and these are complemented by the strategy and implementation programme of the Local Transport Plan. By complying with principles and, where specified, standards set at national, regional and structure plan level, with which other authorities are also required to comply, South Gloucestershire will not thus be disadvantaged in relation to competing areas for investment in employment development.

14.4 In the more rural parts of the area and in the centres for those parts, such as Yate and Thornbury, public transport may not be a viable alternative to the private car, especially for evening journeys, so that in the absence of effective alternative measures, low levels of parking provision could lead to more on-street parking, some of it partly on footways, to the detriment of the safety of road users and the quality of the environment. There may also be exceptional circumstances elsewhere and with other types of development where the standards prescribed are not compatible with the circumstances of the case and a more flexible approach is required. The revised deposit draft plan deals adequately with issues such as this at paragraphs 6.122B, 6.123 and 6.124. These provisions look to the input from and the benefits of Transport Assessments and Travel Plans, required elsewhere in the plan, to justify variations in provision where all possible measures to minimise the need for parking are being taken. They also encourage the shared use of parking in town centres that would result in greater flexibility and reduced land take. Perhaps in the last resort, paragraph 6.124 sets out how problems arising from on-street parking will be resolved, using contributions from developers where these would be justified.

14.5 In respect of the third issue, therefore, I conclude that the plan allows flexibility where it can be rigorously justified and provides mechanisms to ensure that the maxima set do not have unacceptable and uncontrollable consequences. Any change in the policy to remove the ceiling on parking provision would bring the plan into conflict with all three levels of superordinate policy, which in themselves ensure that no area is economically disadvantaged through the adoption of differential standards. I shall recommend no modifications in respect of this issue.

14.6 The plan follows national and regional policy in setting maximum standards. As PPG13 makes clear at paragraph 55, these are not to be seen as automatically acceptable. Aside from the exceptional circumstances covered by paragraph 6.122B, which reflects paragraph 54 of PPG13, it is intrinsic in the term that a maximum is a ceiling and not a norm. The policy identifies two circumstances where there ought to be a presumption in favour of a level below the maximum. These are in accord with the objectives of, in the first case, setting parking levels to promote sustainable transport choices and, in the second case, making best use of land. I consider it entirely appropriate that, at the least, the starting point in these circumstances should be below the maximum. This still gives scope to determine whether, in any individual case, there are material considerations of sufficient weight to push the provision up towards the maximum. Indeed, I find it impossible to envisage how otherwise the stated intention that the standards are maxima could have any real meaning. I do not therefore consider that the term "encouraged" in the second sentence of the policy would express the proper concept of a maximum standard with sufficient force.
14.7 Car free development is one means of assisting in the objective of making the best use of land, through increasing the density of development, or in improving the environment of the development, or both. Where it is rendered possible by the accessibility by non-car modes, it will encourage sustainable travel choices. However, it cannot be regarded as acceptable if it results in environmental and safety problems such as the clogging of the streets close to the development with parked vehicles. Further, there may be other reasons why users of development may have travel needs which cannot be met other than by the private car, and a policy which is over-prescriptive in presuming in favour of car free development would thus be unrealistic. I therefore consider that the policy itself is correctly worded in this respect. On the other hand, I accept that the opportunity for the Council to express more positive support in principle has not been taken in the supporting paragraphs. This shortcoming would be overcome by a proposed change (PC189) to paragraph 6.122C. I understand the objection on this issue has been conditionally withdrawn on this basis.

14.8 Paragraph 6.122A refers to the source, in PPG13, which prompted the Council's decision to prescribe lower maxima for identified locations (Bristol North Fringe and Emersons Green). It then goes on to describe the adverse effects of higher levels of parking and how the need for such levels is overcome by the availability of more sustainable transport modes. The existing and proposed levels of public transport, walking and cycling facilities which do and will benefit the two areas are described, and the means of improvement through the Local Transport Plan is briefly summarised. Finally, the disbenefits to the Council's objectives, were higher parking levels to be permitted, are identified. I conclude that all this amounts to a sufficient justification of the reduced standards and that no further amplification is necessary in the plan.

14.9 The policy does not set parking standards for railway stations and other transport interchanges. It would therefore be inconsistent for the supporting paragraph 6.122B, which allows for exceptions to the policy's standards, to make reference to the needs of such land uses.

14.10 In response to the deposit draft representation on the penultimate issue, the Council inserted into the revised deposit draft a further sentence to paragraph 6.123. This recognises both the potential benefit of undercroft parking and the need for design to take account of the potential waste disposal problems that would ensue if the excavation arising could not be contained within the site. The potential for flooding of such a facility is also a consideration, but one which is sufficiently covered by policy EP2. There is no need for any further change to the plan.

14.11 The adoption of on-street parking control is recognised by PPG13 as complementary to land use policies. The cost should, however, only be borne by development where unacceptable transportation effects would otherwise ensue, sufficient to result in planning permission being refused. The requirement for the developer to contribute to the cost would necessarily have to comply with the requirements of Circular 1/97, but the clarity of paragraph 6.124 would be improved if a reference to the Circular were included. I also consider that the reference to enforcement is confusing. The Council has said this is intended to mean the introduction of orders and not the day-to-day enforcement of the orders. I believe the plan should say so, in order to avoid this confusion. I shall recommend a change to paragraph 6.124 that encompasses both these conclusions.

14.12 In relation to objections to the deletion of policy T9, I have agreed that a proposed change (PC190) should be made which would add an additional paragraph 6.123A.

**Recommendation**

14.13 I recommend that the local plan be modified
i) in accordance with PCs 189 and 190

ii) by amending the latter part of the second sentence of paragraph 6.124 to read: ", the Council may require the development to contribute to the cost of introducing parking controls or other management measures to overcome the problem, in accordance with the provisions of Circular 1/97."

15. Policy T07 Fig 6.6 - Schedule of maximum car parking standards

Objections

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Issues

- Should the plan be amended so that its parking standards for Use Classes A and B differ from those set at national and regional level?
- Should the plan define within Figure 6.6 where Use Class B levels below the maxima should be achieved?
- Should Aztec West be excluded from the North Fringe for parking standard purposes?
- Should the plan be modified to make provision for B2 uses the same as that for B1 uses?
- Should the plan be modified to allow no parking provision for students at residential colleges?
- Should the plan provide greater clarity on which locations and settlements are within the urban area for the purposes of applying residential parking standards?
- Should the plan set a maximum level of parking for all dwellings in urban areas of 1.5 spaces per unit, and if not, what should be the variation between dwelling sizes?
- Should the residential parking standards to be applied outside the urban area be modified?
Does the plan adequately recognise the different parking requirements of full-time residential and part-time day students in higher and further education?

Reasoning and conclusions

Use Classes A and B

15.1 Many of the objections, though not withdrawn, relate to standards set in the deposit draft as being too stringent, as well as the extent to which they relied on a draft version of PPG13. For those use classes for which PPG13 sets standards, the revised deposit draft has been brought into line with the final version of PPG13, published in March 2001, and with RPG10 (September 2001). To a large extent, this overcomes those objections. However, it has still not resulted in standards which are so generous as those sought by some objectors. I deal with the levels set for the North Fringe and Emersons Green both in the preceding section and in the next paragraph below. I consider it essential that the plan should not generally allow provision in excess of national and regional standards. In its general compliance with PPG13, the plan's parking standards support the viability of the public transport system and overcome that element of the potential competitiveness between authority areas which concerns some objectors and to which I refer in dealing with the third issue under Policy T07 and Paragraphs 6.116-6.130. Nonetheless, as I mention above, the plan allows for some flexibility at paragraphs 6.122B and 6.122C. Of the evidence before me on this issue, none carries sufficient weight to convince me that I should recommend standards more relaxed than those which reflect PPG13 and RPG10.

15.2 Other objections in response to the revised deposit draft contend that the standards, particularly for B1 uses, should be more rigorous. I agree with the plan's statement that more severe restrictions in parking provision add significant weight in favour of choosing other transport modes. In the more densely developed parts of the area, and those most subject to congestion, this will at least limit the increase in traffic levels, if not positively reduce them. These points are addressed in part by the setting of more stringent standards in the North Fringe and at Emersons Green, with the justification required by PPG13 included at paragraph 6.122A. Similar standards are set for smaller-scale B1 developments. In addition and more generally, the plan stresses with considerable firmness that the standards are maxima. It positively expects lower provision where alternative transport is readily available and requires the production of Transportation Assessments and adherence to Travel Plans. It also sets criteria for car-free development. At paragraph 6.123 it follows Government guidance in stating that developers will not be required to provide more off-street parking than they themselves wish. The Council has proposed changes (PCs 189A, 190A, 191A, 192A and 193A) to the notes in Figure 6.6, which I agree better reflect PPG13, emphasise further that each standard is a maximum and avoid repetitions of the requirements of the main policy. I recommend these changes.

15.3 I conclude that, with the existing several provisions I have identified, the plan does not require any reduction in the maximum standards for B1 uses in order to ensure that the number of parking spaces included in a development will be the lowest compatible with all the circumstances of each location.

15.4 Notes in Figure 6.6 referring to levels below the maxima were included in the deposit draft but omitted from the revised deposit draft to be replaced by the second, and to an extent by the third, clause of the policy itself. I agree that this is more acceptable approach in setting a general expectation as opposed to rules which apply to certain individual types of case only. No further change in this respect is necessary.

15.5 The access to Aztec West is off the A38 roundabout immediately south of the M5 interchange (Junction 16). There is considerable peak hour congestion associated with this junction on the A38 and at least the slip roads of the M5, with the latter being exacerbated
by the closeness of M5 Junction 15/M4 Junction 20. Objectors point out that only a "quite modest" area of land remains to be developed here and that in any case it should be treated differently from the rest of the North Fringe in that it forms part of an already-established business park which is oriented towards the M5 rather than towards the road system to the south and east. There is, however, no substantive evidence that an unusually high proportion of existing and future employees at Aztec West come from locations so different from the origins of workers elsewhere in the North Fringe that their car-borne journeys would not contribute similarly to congestion in the area. Further, Aztec West, while not a mixed-use development, is close to the existing residential areas of Patchway and Bradley Stoke. I have already pointed out above that, if the case for relaxation of the standards can be properly made for a particular development, the plan allows for this at paragraph 6.122B. I therefore see no justification for making exceptions within the plan for specific sites within the North Fringe.

15.6 The standards for B2 uses, as well as for B1 uses, relate to the floor area of the development. I am satisfied that the assumption in the plan that, area for area, general industrial premises require only three parking spaces for every five required by office premises is a reasonable one. It takes account of the greater space needed for such things as manual handling of equipment and goods, incidental storage space at work stations and the movement of mechanical handling and other plant. The plan makes provision for those cases where B2 premises include more than 10% of office space and I consider this ensures than the plan's differential in provision between B1 and B2 uses is reasonable.

**Use Class C**

15.7 In common with other parking standards, that set for students at residential colleges is a maximum and there is no requirement that more spaces should be provided than the developer wishes. Further, the policy expects lower provision or permits no provision at all where circumstances allow. I am aware of no substantial justification for removing student parking in all cases, but I note the objector to this issue is in a position itself to control parking levels on the UWE site to what it considers to be an appropriate level not exceeding the maximum.

15.8 There is no definition of "the urban area" referred to in the standards for dwellings. The Council has proposed a change (PC53) to rectify this omission, which I recommend should be included in the plan.

15.9 PPG13 requires that policies in development plans should set maximum levels of parking, while national guidance and policy on residential parking provision is at paragraphs 59-62 of PPG3. Paragraph 60 of PPG3 says that parking policies should recognise that car ownership varies with income, age, household type, and the type of housing and its location. At the same time, paragraph 62 says, in effect, that the average level in a development should not exceed 1.5 spaces per dwelling. It is clear to me that it is permissible in these terms to allow some variation in provision so long as the overall average for the development does not exceed 1.5 spaces per dwelling. In principle, this is just what the plan does in Figure 6.6, under C3, sections 1 (including Note 5) and 2, though necessarily the latter section applies only to developments of more than one unit. The variation in standards between dwelling sizes, and thus potential household types and income, is also supported by the Ministerial Statement made on 17 July 2003. That Statement went further in saying that the average level of 1.5 spaces is envisaged as being taken over the whole of the local authority's area. I conclude that the plan conforms to Government policy both in setting a maximum level and in the principle it adopts for variations in levels for residential development.

15.10 I now turn to the maximum levels to be set for different property sizes. The plan sets, to my mind, rather complex arrangements in practical terms for communal spaces for
one-bedroom and, to a lesser extent, two-bedroom units. It must be borne in mind that even the former may have two economically-active residents. I find it difficult to see that good neighbourly relations will endure if, to take one potential outcome, four dwellings are competing for a communal visitors' or "extra" parking space. Furthermore, if the development is not to be specifically car-free, I believe there should be an opportunity for at least one car per dwelling to be parked off-street, whether driven by occupants or visitors. The Council has proposed a change (PC170) in response to which an objection, which expresses similar concerns to my own, has been withdrawn. The proposed change seems to me a reasonable resolution of the problem that, with good design, need not make it unduly difficult for the overall average to be controlled within the maximum of 1.5 spaces per unit. I shall recommend accordingly. I am satisfied that the standards in the plan for three and four bedroom dwellings, when read together with section 2, setting an overall average limit of 1.5 spaces on developments of more than one house, satisfy the requirements of Government policy I have detailed in the preceding paragraph. To allow more spaces in three and four bedroom houses, except very exceptionally in the circumstances set out in Note 5, would make achieving the average more difficult and unduly insulate larger households from the general requirement that development should respect the objectives of sustainability. No further changes are therefore necessary.

15.11 There are two conflicting concerns about the policy's attitude towards residential parking in rural areas. First, development in rural areas is significantly less well-served by public transport, so that the ownership of a car is more justified if not essential for journeys to work, shopping and other services, and for access to leisure facilities. Too tight a restriction on residential parking could therefore give rise to more on-street parking. This would add to the problems that often occur in villages with narrow streets where a significant proportion of the older housing has no scope for off-street parking at all. Second, any average level of provision above 1.5 spaces per dwelling may be seen as conflicting with the limit set by PPG3.

15.12 As I have pointed out above, PPG3 at paragraphs 60 and 62, and indeed more recent expressions of Government policy recognise that some flexibility to take account of circumstances is justified. The Ministerial Statement that the average is intended to be taken over the whole of the authority's area adds to that flexibility. Nonetheless, I do not think that rural development should be given too free a rein on this matter. Sustainability and the best use of land is just as important in the rural areas as it is in urban locations and the viability of public transport in the countryside is particularly sensitive to changes in the level of car ownership and use. I conclude that the plan, in aiming for an average of 1.5 spaces in rural areas but with a maximum of 2.5 spaces, achieves a reasonable balance. I therefore recommend no modification. However, I note that the Government is undertaking research into this issue and the Council may wish to review its position if the results of the study emerge before the plan is adopted.

Use Class D

15.13 Figure 6.6 states, in the notes on D1 uses, that the number of student parking places is based on the total number of students rather than the full-time equivalent. The effect of this is to provide extra capacity for those students more likely to be travelling a longer distance to attend part-time courses, since their attendance will presumably be staggered. For new buildings, educational establishments are subject to broadly the same policies as other new development, which the plan expects to be located where the need to travel by private car is minimised, and I see no reason why this should not be so. Both the standard in the plan and this note correspond with Annex D of PPG13. I am aware of no circumstances that would justify the plan's departure from these national standards. If such circumstances are found to apply at any particular proposed establishment, paragraph 6.122B describes how parking provision above the maximum may be justified. I conclude that concerns expressed on this issue are already addressed adequately by the plan.
Recommendation

15.14 I recommend that the local plan be modified in accordance with PCs 53, 170, 189A, 190A, 191A, 192A and 193A.

16. Policy T08 and Paragraph 6.126 – Car parking standards for people with disabilities

Objections

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Issues

Should the plan set standards which are less directly tied to the provision of general car parking?

Should the plan draw to employers’ notice their responsibility for meeting the parking and other accommodation needs of disabled people?

Reasoning and conclusions

16.1 The Council has consulted a wide range of local and national organisations with interests in accessibility for people with disabilities and none has objected to the standards set by the plan. The levels are in broad accord with national guidance contained in Traffic Advisory Leaflet 05/95. Though that document does suggest a greater minimum in numeric terms than the plan (that is at least 2 or 3 bays depending on the premises, rather than one), the requirements of the plan extend beyond Figure 6.7 to provisions identified as part of the transport assessment requirements of policy T12. The Council also provides marked parking spaces in public areas close to many potential destinations and is working towards sustainable transport options that may provide an alternative to the car from some mobility-impaired people. I therefore conclude that the standards set represent an adequate minimum level of provision.

16.2 The plan seeks to ensure that, in planning the layout of a site, adequate space is available to meet the likely parking requirements of disabled people. It therefore sets minimum standards in this respect. If those levels should be insufficient to meet the needs of those actually employed or generally visiting the site, the site operators may be able to make up the shortfall by reallocating part of the policy T7 provision, which is of course a maximum. In other respects, it is not any part of the purpose of the plan to remind employers of their obligations under or arising from other legislation.

Recommendation

16.3 I recommend that no modification be made to the local plan.
17. **Policy T09 – Redevelopment of private car parking areas**

**Objection**
- 431/515 Friends of the Earth T09

**Support**
- 431/021 Friends of the Earth T09
- 435/023 Bristol City Council T09

**Issue**
Should the policy be retained in the plan in order to cover the redevelopment of existing parking areas?

**Reasoning and conclusions**

17.1 The objection has been withdrawn on the condition that its principle should be reflected in an additional paragraph to policy T7, as set out in Proposed Change 190, which I agree renders policy T9 of the deposit draft unnecessary. I make the necessary recommendation in relation to policy T7 and paragraphs 6.116-6.130.

**Recommendation**

17.2 I recommend that no modification be made to the local plan.

18. **Policy T10 and Paragraphs 6.135-6.139 – Travel plans**

**Objections**
- 221/007 Slough Estates Plc T10
- 512/511 BAE Systems Properties Ltd T10 6.136
- 512/512 BAE Systems Properties Ltd T10 6.139

**Support**
- 51/007 Bristol Rugby Club Ltd T10
- 431/022 Friends of the Earth T10

**Issues**
Is the plan realistic in seeking to impose travel plans rather than encouraging them?

- Should the plan recognise that insufficient information may be available for a travel plan to be submitted at the outline application stage?
- Should the plan recognise that some aspects of a travel plan may not be enforceable or may change with changes in occupancy?

**Reasoning and conclusions**

18.1 PPG13 lays stress on the importance of travel plans for developments which are likely to have significant transport implications. Paragraph 91 of PPG13 states that part or all of the travel plan may be made binding by planning conditions or planning obligations. Policy T10 and the supporting paragraphs in the revised deposit draft are therefore entirely compatible with national policy in imposing plans where justified by the scale and type of new development and encouraging their adoption elsewhere. Adequate references are
made to Circular 1/97 in the supporting text of the revised deposit draft to ensure there is no doubt as to the procedures and justification that will be required and the text now overcomes objections in that respect.

18.2 I consider it reasonable that, at the outline application stage, it should be clear to the decision-maker that a development is capable in principle of operating within a framework of sustainable travel objectives. However, it is equally reasonable to accept that a workable and enforceable travel plan cannot be produced until a good deal of detail of the nature and potential occupancy of the development is known. Nothing in the plan rules out such a two-stage approach to the production of a travel plan, and the penultimate sentence of paragraph 6.137 at least opens up the possibility of its being dealt with in this way in consultation with the Council. However, I consider it is important that the local plan should positively recognise that a two-stage process may be the best means of ensuring integration between the proposals for the development itself and a practicable travel plan. This can be achieved by an addition to paragraph 6.137.

18.3 Only those aspects of a travel plan which are enforceable and necessary to the granting of a planning permission may be the subject of planning conditions or obligations. Where conditions or obligations have been applied, there are processes available for seeking a change to meet altered circumstances in the use of the development which were not envisaged when planning permission was granted. Both matters are adequately covered in the use of the words "some or all" in the second sentence of paragraph 6.134 and the same phrase in paragraph 91 of PPG13.

**Recommendation**

18.4 I recommend adding a further sentence before the last sentence of paragraph 6.137, to read: "A two-stage approach may be adopted, with a broad or strategic travel plan being submitted with an outline application and a full travel plan accompanying a detailed or reserved matters application."

19. **Policy T11 and Paragraphs 6.141-6.147 - Traffic management proposals**

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**Issues**

Should the plan include specific traffic management schemes?
Should the plan require new junctions to incorporate design standards to favour pedestrians, cyclists and buses?

Reasoning and conclusions

19.1 The process for the identification, consideration and implementation of traffic management schemes is short in relation to the timescale for the preparation and period of the local plan. To include such schemes in the local plan would not therefore be either helpful or realistic. The Local Transport Plan (LTP), on the other hand, is required by the Government to be reviewed annually and thus provides the preferred platform for the Council’s specific proposals for traffic management. Although a scheme to improve traffic flows at Coldharbour Lane and its junction with A4174 includes new road construction, it originally formed part of the Avon Ring Road Major Scheme bid and will now be progressed in the 2005 LTP as a traffic management scheme. I therefore make no recommendation that the plan should be modified to include schemes at Bitton, A38 –Grovesend / Tytherington junction, Abson, Wick and Coldharbour Lane.

19.2 The plan lays emphasis on the need to take full account of the needs of pedestrians and cyclists not only in policy T11 but also in policies T12 and D1. Bus priority is a principal feature of schemes at existing and new junctions where traffic congestion is an issue. The LTP with the associated strategy documents and current good practice in highway engineering all take account of the priority which should be given to pedestrians and cyclists. However, the design of individual junctions remains an engineering matter to be considered against the individual circumstances. A blanket policy in the local plan which went further than paragraph 6.141 would unnecessarily restrict the exercise of proper engineering judgement in individual cases.

19.3 A further objection has been withdrawn on the basis that a change to paragraph 6.141 in the revised deposit draft will be retained.

Recommendation

19.4 I recommend that no modification be made to the local plan.

20. Paragraph 6.149 – Road schemes - Lockleaze to A4174; Winterbourne Bypass

Objections

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Issues

Should the plan include the provision of a link road from Lockleaze through Wallscourt Farm to Stoke Gifford?

Should the plan include a commitment to pursue the Winterbourne Bypass (northern and southern sections)?

Reasoning and conclusions

20.1 A link road through Wallscourt Farm would involve the construction of a further junction on A4174 Avon Ring Road, exacerbating the congestion problems. Furthermore, it would lead to a substantial increase in traffic within Lockleaze and through the Wallscourt Farm development as drivers used the new route to avoid congestion elsewhere on the network. The plan does include for bus, cycle and pedestrian facilities along the corridor leading northwards from Lockleaze but I conclude that any such route for general motor traffic would run counter to the strategy and objectives of the plan.

20.2 For the avoidance of doubt, I understand the southern section of Winterbourne Bypass to be a road linking the roundabout at Parkway North to the A4174 in the vicinity of Maules Lane, east of Coldharbour Lane. The route identified in previous development plans is within, though in some places close to the edge of, the Green Belt.

20.3 It is not disputed that in studies undertaken up to late 1997 the scheme was shown to have good economic justification. This would arise from journey time savings, including for traffic originating in the extensive fairly recent development in Bradley Stoke. This traffic would be able to avoid the delays arising from both the general activity in Stoke Gifford and the narrow railway overbridge adjacent to Parkway Station. The scheme would also have acknowledged environmental benefits in providing a relief for Stoke Gifford from this through traffic. On the negative side, it could attract more traffic onto High Street and Beacon Lane in Winterbourne.

20.4 However, since 1997 the emphasis for congestion relief in the North Fringe has moved away from new road construction. In line with Government policy and sustainability objectives, the Council is now seeking to encourage the use of transport modes other than the private car. Shorter journeys arising from the new pattern of development allocations should encourage walking and cycling, while good public transport provision should provide an attractive alternative for longer journeys. In this context, the scheme could well run counter to the Council’s objectives by removing restraints and encouraging more car use, undermining the viability of the public transport strategy and provision and conflicting with Government policy. It would certainly have the capability to deliver more cars more quickly to the Ring Road in the morning peak period, adding to the congestion there. Whether or not that additional congestion would be, on an iterative basis, a restraint on the use of the scheme is, like the other possible outcomes, a matter requiring further study.

20.5 I am certain that the road should only be built if it could shown to be a useful part of a comprehensive package of measures for dealing with the transport needs of the areas it would serve. No study to inform me on this question has yet been completed and the evidence I have is that results are unlikely to be available in time for the scheme to be commenced during the period of the plan. The dependence of the scheme on the use of Green Belt land places extra weight on the need for such justification, alongside the requirements of PPG12 relating to transportation schemes. At the same time, the fact that any proposal is likely to lie within the Green Belt affords a degree of protection from other development during the plan period.

20.6 There is a dispute about payments made under a Section 106 agreement but the local plan inquiry is not a forum for the resolution of this. In any case, the availability or
otherwise of funding for the scheme is not the issue on which the decision turns, being outweighed by the other matters I consider are more than sufficient to justify my making no recommendation that the scheme should be reinstated in this local plan.

20.7 The northern section of Winterbourne Bypass would provide relief for the residents of the settlement on the B4058 and, probably, the A432 corridors. Though not economically or environmentally justified in past studies, it could become so if the southern bypass were to attract more traffic to those routes. However, this would require further consideration if and when a decision were made in favour of the southern bypass. I can therefore make no recommendation in favour of the northern bypass.

**Recommendation**

20.8 I recommend that no modification be made to the local plan.

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**Objections**

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Issue
Should the plan include a new M4 Junction 18A and a link road to A4174 Avon Ring Road?

Reasoning and conclusions

21.1 Traffic wishing to travel between the eastern fringe of Bristol and the M4 east of Junction 18 is deterred from using M4 Junction 19 by the severe congestion on the A4174 and M32. There is no doubt that a significant proportion therefore chooses the alternative routes of A420/A46, passing through Wick, and B4465/A46, passing through Pucklechurch. There is even some anecdotal evidence that these alternatives present to some a more attractive route even if they wish to travel west on the M4. A new junction on the M4, designated Junction 18A, with a link to A4174 at Emersons Green close to or at the existing roundabout junction with B4465, would be a means of reducing the strongly-felt distressing impact of longer-distance traffic on the residents of settlements alongside the A420 and B4465 to the east of A4174. It also would provide a good connection to the strategic network from the Science Park and other economic development at Emersons Green and reduce delays at Hambrook and on M32.

21.2 However, the evidence presented by the Council is that, amongst other things, the cost-effectiveness of the proposal is in doubt, as is therefore its priority for funding amongst other transportation measures. The scheme is not supported by the Highways Agency, which remains concerned about its impact on the strategic network, even if the junction were restricted to eastbound-on and westbound-off slip roads to avoid junction hopping between the new junction and Junction 19. The full consideration of the various concerns on both sides of the argument and the justification for the cost must await the outcome of a study commissioned to examine strategic multi-modal transport and land use scenarios in Greater Bristol area, which provides specifically for re-examining the case for Junction 18A. The outcome of this study, even if favourable, would not be the end of the story. No finance has been committed and the scheme is not in any programme, so the proposal is by no means at a stage where its inclusion in the present plan would conform with PPG12 paragraphs 5.17, 5.22 and 6.24.

21.3 Following evidence to the Examination in Public, the JRSP includes no proposal for Junction 18A, neither is the scheme supported by RPG10. If the plan were to include the scheme, it would therefore be in conflict with regional and national policy and it would not be in conformity with the JRSP. I am therefore unable to recommend its inclusion in this plan.
Recommendation

21.4 I recommend that no modification be made to the local plan.

22. Paragraph 6.149 – Road schemes - Stover Link Road

Objections

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Issue

Should the plan include the provision of Stover Link Road in Yate?

Reasoning and conclusions

22.1 As a result of a study undertaken on behalf of the Council, Stover Link Road was deleted from the Local Transport Plan (LTP) as inconsistent with its strategy to avoid traffic generation. The scheme was deleted from the draft of the JRSP prior to its adoption. The scheme is therefore neither supported at the strategic level, neither is it identified and programmed for implementation. Its inclusion in the plan would therefore conflict with the Structure Plan and with the requirements of PPG12 that only firm proposals, identified in the LTP and with a reasonable degree of certainty of proceeding within the plan period, should be included. Whilst the guidance in PPS12 may be said to take a more permissive position, the circumstances of this link are such that I am not led to a different view.

22.2 I note that, despite the physical limitations of Stover Road, it carries a significantly higher proportion of HGVs than Station Road, the A432. There are traffic management measures designed to divert heavy traffic from Station Road and other schemes of benefit to pedestrians, meeting some of the concerns of the objectors. Because the previously-defined line of the Stover Link Road runs along the edge of the Green Belt, it is highly unlikely that, should a decision be made to proceed with the scheme in the future, the land required will have been developed in any other way.

Recommendation

22.3 I recommend that no modification be made to the local plan.

23. Paragraph 6.149 – Road schemes - Westerleigh Common Link Road; Dualling of B4057, Stoke Gifford

Objections

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Issues

Should the plan include the provision of Westerleigh Common Link Road?

Should the plan include a scheme to dual the B4057 in Stoke Gifford?
Reasoning and conclusions

23.1 Parts of what would be the Westerleigh Common Link Road have already been constructed, but the continuity is broken by the absence of a bridge over the railway line. The expenditure on such a structure requires justification in terms of its cost-benefit ratio. As a project, it also must be shown to be compatible with current national and local policies seeking to avoid traffic generation. The Council has presented evidence, based on a study carried out on its behalf, that the scheme does not meet these requirements. It is not included in the Local Transport Plan. In view of this, it is very unlikely to achieve the necessary commitment or funding to enable it to be progressed within the period of the local plan. Thus, whether or not the legal issues raised by the objector are valid, the inclusion of the scheme would bring the plan into conflict with the requirements of PPG12 and I am therefore unable to make a recommendation to this effect. Whilst the guidance in PPS12 may be said to take a more permissive position than PPG12, the circumstances of this link are such that I am not led to a different view. I note that the Council has taken, and proposes to take, measures to deal with road safety and other environmental issues on the nearby existing road network, which may otherwise have been relieved by the provision of the Link Road.

23.2 The scheme to dual the B4056 was omitted from the Local Transport Plan, as increasing road capacity for private cars, contrary to Government policy and the Local Transport Plan strategy. Its inclusion in the local plan would therefore run counter to the requirement that the plan should be consistent with national and other local policy. The land formerly reserved for the scheme remains part of the highway and will be available if required for transport uses of a more sustainable type.

Recommendation

23.3 I recommend that no modification be made to the local plan.

24. Paragraphs 6.150–6.153 – Road schemes - M49 Junction and Severnside spine road and link road

Objections

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<td>473/002</td>
<td>Astrazeneca T11 6.151-6.153</td>
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Issues

- Should the plan give greater support to the Severnside road proposals and show their approximate location on the Proposals Map?
- Should the plan require that further substantial development at Severnside will be dependent on the provision of the M49 junction, whose timing will be guided by the Highways Agency?
- Should references to the Severnside road schemes be deleted from the plan?

Reasoning and conclusions

24.1 I report fully on development at Severnside in the strategy chapter. The key transportation infrastructure feature, as currently identified, of the development area is an
intermediate junction on the M49, to which the other two schemes would provide connections. The Highways Agency will need to be satisfied with the design and location of this junction, but also with the impact of the traffic generated by the development on the strategic network, given the reserve capacity of the motorways in the area. At present, insufficient work has been completed to enable a development/transport strategy to be agreed, so there is significant uncertainty about the timing and funding of the scheme. It seems to me that all elements of the additional highway network need to be considered in conjunction with the main development proposals for the area.

24.2 In chapter 2 I have supported the identification on the Proposals Map of an area of land to be reserved for the future construction of the M49 junction. However, I do not consider that the highway proposals as a whole are at a stage where their inclusion would conform with the requirements of PPG12 paragraphs 5.17 and 5.22 and of PPS12. My view is that, apart from the M49 junction itself, the diagram at Figure 6.9 provides as much locational information as can be reasonably and usefully included in the plan.

24.3 Paragraph 6.150 opens by stating that the three major schemes, including the M49 junction, are required to serve development needs. Policy T12 requires all new development to meet criteria related to transportation. The supporting paragraphs require Transportation Assessments for developments having significant transport implications. I am satisfied that the plan, as recommended to be modified, would include adequate safeguards to ensure that further development at Severnside will not proceed unless the necessary transportation infrastructure will be in place to accommodate generated traffic without its having a harmful effect on the existing network. The Highways Agency have an established role in this process. I consider that it would add to the value and clarity of the plan if the adopted text were to include the up-to-date situation on the assessment of the M49 junction, particularly including the progress of the Greater Bristol Transport Study. Otherwise, the plan is as clear as it can be in the present circumstances and I restrict my recommendation to the incorporation of this section within the text supporting my recommended policy for the Severnside area, to be included within the strategy chapter.

24.4 The development of Severnside/Avonmouth is the subject of Policy 14 of the JRSP. This identifies the need to improve the transport infrastructure. It requires provision to be made not only for the major road schemes, but also for a coordinated package of public transport, cycling and walking measures as well as an intermodal freight terminal within the Bristol City boundary. The local plan conforms with the Structure Plan in reflecting all of these requirements that are appropriate to it, but would not do so if all reference to the road schemes were omitted.

24.5 In current circumstances and in the light of studies so far undertaken, it may be difficult to envisage that the area could be developed without the identified schemes. However, the Transportation Assessments I refer to above will be an important part of future planning applications within the area. It will be for those assessments to demonstrate the extent to which each proposal is dependent upon the road schemes, having regard to their role within an integrated approach, including consideration of the potential contribution of alternative transportation measures. It is further established that the Highways Agency is inevitably concerned that the functionality of the strategic highway network will not be prejudiced. The Environment Agency will also need to be satisfied as to the impact of the whole development on the flood plain. I do not consider therefore that it is necessary to delete the road schemes in order to ensure its compliance with its own sustainability objectives.

**Recommendation**

24.6 I recommend that the local plan be modified by the deletion of paragraphs 6.150 to 6.153 and Figure 6.9 from the transport chapter and their inclusion within...
the supporting text to the policy I recommend for the Severnside area, in item 9 of chapter 2 of my report. This should include a statement of the status, at the time the plan is adopted, of the reassessment of the M49 Intermediate Junction.

25 Paragraph 6.153A – Road scheme - Northfield Link Road

Objection

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Issue

Should the plan place limitations on the design standards of Northfield Link Road and seek to exclude all through motorised traffic from Highwood Road except for public transport?

Reasoning and conclusions

25.1 The plan, at paragraph 8.73, requires the developers of Northfield to provide an alternative east-west route linking Cribbs Causeway and the A38, with a view to allowing for public transport priority along Highwood Road and minimising the segregating effects of Highwood Road. The design standards of the new route will be determined in accordance with its projected usage by all classes of traffic, including pedestrians, and the requirement, set down at paragraphs 8.67 and 8.68, that the development should be as sustainable as possible. The consideration of the details of such matters are not for the local plan, but would come within the scope of the determination of a planning application. I am satisfied that the plan, taken as a whole, will ensure that that determination may be made in accordance with national, regional and local policies to reduce the use and impact of the private car, to promote sustainable transportation modes and to provide highways safe for all users.

Recommendation

25.2 I recommend that no modification be made to the local plan.

26. Policy T12 and Paragraphs 6.154-6.167 – Transportation development control policy for new development

Objections

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Issues

Should the plan make clearer the basis on which contributions to public transport and pedestrian and cycle links will be sought, including the possibility that funded improvements may cross local authority boundaries?

Should the plan recognise that contributions may prejudice the realisation of other planning objectives?

Should the policy and supporting text make reference to the extant planning permissions at Severnside?

Should the plan include cross-references to all policies which must be satisfied by development proposals?

Should the plan be amended to comply with national guidance on transport assessments?

Should the plan be amended to omit the distinction between small and major schemes?

Reasoning and conclusions

26.1 The objections relating to the first issue were raised at the deposit draft stage. Subsequent alterations to criterion F of the policy and 6.162 in the revised deposit draft make it clear that contributions will be sought in accordance with the requirements of Circular 1/97 and may be applied across boundaries. The policy and its supporting paragraphs apply to proposals which come forward for assessment against criteria and it is not possible to be specific as to what provisions for public transport etc. would apply in all cases. However, a range of examples is included in paragraph 6.162 which, together with the transport assessment, will enable greater certainty to be achieved for individual proposals as they evolve. For development proposals in the plan, more detail on the transportation requirements is included in the relevant policy and/or its supporting text. No further modification is therefore necessary.

26.2 In accordance with Circular 1/97, the level of provision or the amount of any contribution would be that which was only sufficient to make a proposal acceptable in land use planning terms. I see no value in the plan's referring to the overall economic viability of a proposal in this respect, since it may be taken to imply that some relaxation of the Circular 1/97 requirement would be considered.

26.3 Matters relating to development at Severnside are dealt with on a site-specific basis in the strategy chapter of the plan. Policy T12 is a criteria-based policy relating to general development control and I consider that site-specific references, either in the policy itself or in the supporting text, would not be justified. Indeed they would, if anything, cause confusion rather than add clarification.

26.4 Statute requires that proposals shall be tested for compliance with the development plan as a whole and any reference to this requirement in the policies is unnecessary. For the avoidance of doubt, each page of the plan carries a warning to this effect which I consider is an adequate reminder to those less familiar with the development control process.

26.5 The first objection relating to transport assessments predates the publication of PPG13 in March 2001. The revised deposit draft includes substantial modifications, as a result of which it now fully reflects the recommendations of PPG13.

26.6 The text which refers to a distinction between small schemes and major proposals is a direct quotation from paragraph 23 of PPG13. Many proposals will fall naturally into either
the "small" or the "major" category. Otherwise, the amended paragraph 6.155 in the revised deposit draft of the plan follows paragraph 25 of PPG13 in recommending discussions to "scope" the transport assessment requirements, and these will enable the position on borderline cases to be clarified. No further modification is justified.

26.7 Objections that the policy omits a criterion that development should not lead to inappropriate on-street parking have been withdrawn, conditional upon the acceptance of a proposed change to paragraph 6.161 (PC134). I agree that on-street parking may have adverse effects on environmental conditions and on highway safety. On the other hand, there are circumstances in which it operates as a form of traffic calming and the resulting environmental and safety benefits may outweigh any harm. The proposed change would include the qualification of unacceptability to the identification of on-street parking as being an example of an adverse environmental condition. I consider that this would provide adequately for judgement to be applied to individual cases.

26.8 I favour a proposed change to paragraph 6.161 in my conclusions on paragraphs 6.41-6.45, dealing with freight transport.

Recommendation

26.9 I recommend that the local plan be modified in accordance with PC134 and PC135.

### 27. Paragraphs 6.171-6.173A – Improving national and international links

**Objections**

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**Issue**

Should the plan be amended to reflect the status of the Greater Bristol and regional transportation strategy?

**Reasoning and conclusions**

27.1 A new paragraph (6.173A) has been included in the revised deposit draft to overcome objections that no reference had been made to a new junction in the M49. This fails to include reference to the inclusion of this proposal in the JRSP policy for Severnside, an omission which is addressed by a proposed change (PC58) which I agree completes the picture for readers of the plan, subject to any changes necessary to reflect my recommendation at paragraph 24.6 above.

27.2 By separating rail and road issues the plan suggests incorrectly that SWARMMS addresses only the latter. I agree with the proposed changes (PCs 54 and 55) that this can best be rectified by removing the subheadings "Rail" and "Motorway and Trunk Roads" completely.

27.3 The progress of transportation studies is an ongoing issue. PC56 seems to have accurately summarised the present position at the time the change was proposed, and as
such I am content to recommend it. However, I note that it refers to work due for completion "early in 2004" and for the need for decisions based on that work to be considered. I assume that the Council will wish to make further changes to this section as the picture changes during the period leading up to the adoption of the plan.

27.4 A further proposed change (PC57) makes a correction to the title of a government document.

Recommendation

27.5 I recommend that the local plan be modified in accordance with PCs 54, 55, 56, 57 and 58, subject to any changes necessary to reflect my recommendation at paragraph 24.6 above.


Objections

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Issues

- Should the plan take a stronger stance in not permitting commercial flights at Filton under any circumstances?
- Should the plan give more guidance on how the need for commercial flights from Filton should be proven?
- Should the plan be more specific in its reference to Government policy on air transport?
- Should the plan omit reference to the Council's support for JRSP policies relating to Bristol International Airport?

Reasoning and conclusions

28.1 A policy setting an unconditional ban on commercial uses of the airfield would need to be fully justified in the plan. Reference to an earlier appeal decision could not contribute to such a justification as each application should be considered on its own merits. The justification would have to be based, not only on environmental effects, but also on full consideration of complex technical issues which would be difficult if not impossible to define in advance for all possible future proposals. Following alterations for the revised deposit draft, the policy is, unusually, negatively worded. It also sets criteria requiring that no harm be caused within the wider environment of the airfield and that there should be a proven
public, rather than commercial, interest need for any development of commercial flights at Filton. I am therefore satisfied that the policy and its supporting text go as far as is practicable or necessary in protecting the public interest, and in particular in addressing the considerable concerns of residents of the surrounding area.

28.2 The additions made to paragraph 6.180 give details of how need for a proposal would be assessed. The revised paragraph sets out the valid land use considerations and refers to the guidance provided at structure plan, regional and national level. This content of the paragraph is sufficient support, explanation and amplification of the final clause of the policy.

28.3 Paragraph 6.180 makes a generic reference to Government policy on air transport. To tie the reference to particular phases in the development of that policy, or to particular publications which set out the policy from time to time, could at the best lead to confusion or uncertainty as the policy continues to evolve, and at the worst render the plan out of date in important respects. I therefore consider that the generic term is both adequate and preferable to more specific references.

28.4 Paragraph 6.179 is a factual report of the status of Bristol International Airport. The paragraph provides background to policy T14 by stating where the focus of commercial flights for the area actually is and why. It is reasonable for it to record the Council's support for the JRSP to which it is a party. Given the airport's location and extensive car parking facilities, the Council's co-operation in improving accessibility will no doubt be directed to enhancements of public transport connections, in accordance with its sustainability objectives.

Recommendation

28.5 I recommend that no modification be made to the local plan.
CHAPTER 7 - THE ECONOMY

1. Amendment to Proposals Map

Objection
27/001 Mr D R Osborne

Introduction

Issue
Should this site be included within a comprehensive development of the surrounding ICI land?

Reasoning and conclusions
1.1 The objection site is an agricultural field, set within open countryside some distance from the small village of Hallen. It lies within the coastal zone where development is restricted. In normal circumstances there would be no doubt that it is an inappropriate location for development. However, it is bounded to the north, west and south by part of the extensive area of land the subject of the longstanding extant planning permission granted to ICI, as shown on the Proposals Map. On the face of it, there is some logic in including this site within any ICI development, in terms of squaring off the land available for development.

1.2 However, the objection site and the immediate adjoining ICI land has been cut off from the bulk of the land with planning permission by the construction of the M49. As a result of this it seems highly unlikely that ICI will develop this section of their land. The permission has been extant for nearly 50 years and ICI appear to have no plans to implement this at the present time. Given this situation and the otherwise very unsuitable nature of the location for development I do not consider that the local plan should make any provision for its development. Should, contrary to current expectations, ICI come forward with plans for the section of their holding to the east of the M49, then the council can look again at this matter to see if a development should include this land.

Recommendation
1.3 I recommend that no modification be made to the local plan.

2. Paragraphs 7.1-7.8 - Aims, Structure Plan and Objectives

Objections
265/512 Persimmon Strategic Land (Western) 7.2
289/001 Bristol & England Properties Ltd 7.3
348/027 ICI Corporate Real Estate 7.4
408/005 P & A Bennett 7.2
409/039 North East Thornbury Consortium-Bryant Home Ltd 7.4
431/034 Redrow Homes (South West) 7.4

Support
431/518 Friends of the Earth 7.2
431/033 Friends of the Earth 7.3
510/511 South West of England Regional Development Agency 7.8

Issues
Should the term "sustainability" in the Aim paragraph be expanded upon?
Do the objectives relate to the plan's aim?
Would the restraint on employment growth in the North Fringe damage the area's economy?

Should the objectives spell out more detail in respect of importance of the major development sites, the range of employment needs and uses?

Reasoning and conclusions

2.1 Sustainability is a subjective term. It is not easy to define, but its inclusion within this overarching aim seems to me to be quite reasonable. It will be for the strategy and the more detailed policies to develop the concept, against which they individually can be examined. I see no reason to change this broad aim.

2.2 I see no conflict between objective 1 and the Aim set out in paragraph 7.2. The provision of sufficient land to meet the structure plan requirements is appropriate. This need not be at the expense of sustainable development. Social and economic needs have to be balanced with environmental and resource considerations. Some growth needs to be accommodated and the plan aims to do this in the most sustainable form. I see no advantage in splitting objective 6 into two parts, nor do I quarrel with the inclusion of an objective related to sustainable tourism. The reference to local employment needs reflects the structure plan. I am content with that term within the set of broad objectives, though the strategy and individual policies will need to develop all the objectives in the context of regional and strategic guidance.

2.3 Concerns are expressed about the impact of the strategy for employment development, in particular the restraining of growth in the North Fringe and also the potential of areas outside the North Fringe to support economic development. These are matters that are fundamental to the strategy of the plan. I consider them in some detail in the strategy section of my report. Suffice it to say here, I am broadly content with these paragraphs.

2.4 A number of the objections wish to see a stronger emphasis on their particular sites/areas of the economy. I see little benefit in this general, introductory section going into more specifics about sites and areas of the economy that are considered later in this chapter and elsewhere in the plan.

Recommendation

2.5 I recommend that no modification be made to the local plan.

3. Paragraphs 7.14, 7.15 and 7.17 - The Local Economy

Objections

<table>
<thead>
<tr>
<th>Objection</th>
<th>Issue</th>
<th>Reasoning and conclusions</th>
</tr>
</thead>
<tbody>
<tr>
<td>267/025</td>
<td>7.14 7.15</td>
<td>The references to BAe at this section are factual in nature. Policies in the plan are supportive of development associated with Filton airfield. I do not consider it necessary or appropriate to include wording that expressly relates and supports this one company. The concerns of the University have been met by the revised deposit version of the plan.</td>
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Recommendation

3.2 I recommend that no modification be made to the local plan.

4.  Paragraph 20 - Supply and Demand for Employment Land

Objections

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<thead>
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<th>Description</th>
<th>Reference</th>
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<tbody>
<tr>
<td>348/030</td>
<td>ICI Corporate Real Estate</td>
<td>E01 7.20</td>
</tr>
<tr>
<td>431/035</td>
<td>Friends of the Earth</td>
<td>E01 7.20</td>
</tr>
</tbody>
</table>

Issues

- Are the Severnside figures correct?
- Is the plan confusing as to the status of employment land?

Reasoning and conclusions

4.1 The Severnside figures relate to land west of the M49 which is safeguarded for employment purposes. It does not include the land with planning permission on the east side of the motorway.

4.2 I agree with the objection from FoE. The figures are a little confusing and could be presented in a clearer manner. At the moment the plan contains some figures in this paragraph, lists allocations in policy E1 and contains, at appendix 11, under the heading "Employment Land Availability", a list of sites within the safeguarded employment areas under policy E3 and then those sites allocated under policy E1.

4.3 I consider that it would be helpful if this paragraph, or a new one, brought all the information together in a brief, summary form. This could set out, possibly in table form, the total of available employment land, with the composite elements: allocations made in this plan under policy E1; and sites available for development within existing employment areas safeguarded by policy E3. This latter figure could be broken down into two parts by the separation out of the very large Severnside land. I suggest this because of that land's particular circumstances and characteristics and because its inclusion within a global figure can be thought of as possibly distorting the overall picture. The table could also distinguish between greenfield and previously developed land sites. The council may wish to consider some revised wording in Appendix 11 to make it absolutely clear that the hectare figures relate to land within safeguarded employment areas that are currently available for development.

4.4 For further clarity it would be helpful, given the importance of the issue, if the plan set out clearly an overall figure, and list of sites, that have been taken out of employment allocation and reallocated for other uses in the North Fringe area.

Recommendation

4.5 I recommend that the local plan be modified by the inclusion within this section of a table setting out clearly the amount and type of land available for employment development.
5. Paragraph 7.21 - Travel to Work Patterns

Objections

408/004 P & A Bennett
409/040 North East Thornbury Consortium-Bryant Home Ltd
Redrow Homes (South West)

These objections relate to the scope to increase the proportion of Chipping Sodbury/Yate and Thornbury residents working locally. These issues are considered in the strategy and housing chapters.

6. Policy E01 – Proposed employment development and mixed use schemes including employment development

Objections

283/037 Government Office for the South West
451/007 North Somerset Council

Support

451/004 North Somerset Council

Issues

Is this policy necessary?
Do the North Fringe allocations conflict with the JRSP?

Reasoning and Conclusions

6.1 In my view it is entirely appropriate to have a policy which sets out the land to be allocated for employment purposes. 2 of the 3 sites are mixed use sites and are considered in detail in the housing chapter. The third, now that it is intended to be entirely employment, is properly considered here. So, whilst there is some duplication with chapter 8, the policy provides an essential and helpful function of clearly listing the land that is being allocated for new employment development.

6.2 I consider the level of allocation of employment land in the North Fringe area in the strategy section of my report.

Recommendation

6.3 I recommend that no modification be made to the local plan.

7. Policy E01 - Emersons Green

Objections

144/005 J J Gallagher Ltd; Heron Land Developments Ltd;
Quintain Estates Developments Plc; Sainsburys Supermarkets
202/007 Highways Agency
296/003 SW Regional Development Agency
436/003 Cory Environmental (Gloucestershire) Ltd
Support

303/004 Ibstock Building Products Ltd E01

*I consider this proposal under item 18 in the housing chapter.*

---

### 8. Policy E01 Northfield

#### Objections

- 202/006 Highways Agency E01
- 413/002 Mr M M Richardson E01

#### Support

- 267/031 Arlington Property Developments Ltd E01

*I consider this proposal under item 9 in the housing chapter.*

---

### 9. Policy E01 - Northfield and Emersons Green

#### Objections

- 49/007 Crest Nicholson Properties Ltd and ICP Properties Ltd E01
- 430/014 Cala Homes (South) Ltd E01
- 438/012 Execs of Mr L Smith E01

#### Support

- 511/505 Crest Nicholson Properties Ltd & Harcourt Developments E01

*I consider these proposals in the housing chapter of my report*

---

### 10. Policy E01 - Site 5 Stover Road

#### Objections

- 37/501 Mr & Mrs R Duck E01
- 344/507 Sydney Freed Holdings & J S Bloor (Newbury) Ltd E01
- 354/504 Council for Protection of Rural England (Avonside) E01
- 499/501 Mr & Mrs R Hedger E01
- 518/501 Mr & Mrs A Bird E01

#### Support

- 511/505 Crest Nicholson Properties Ltd & Harcourt Developments E01

**Issues**

Should this site be retained as a mixed use site?

Can this site be developed without unacceptable impact on the area and its residents?

Is sufficient land provided in Yate?

**Reasoning and conclusions**

10.1 The site lies outside the green belt, which forms its western boundary. This site has been the subject of an allocation since the 1990 Yate and Chipping Sodbury local plan, when 2.5 hectares were identified for employment purposes. The first deposit version of this plan allocated it as a mixed use site, with the revised deposit version reverting to a solely employment use, on a slightly larger, 2.7 hectare, site. Subsequently PCs 59 and 67 reinstated
the mixed use allocation, on the smaller site. Finally, PCs 167 A to F rescinded PCs 59 and 67, reallocating the larger site for B1 uses only.

10.2 National guidance places a firm emphasis on achieving mixed use developments as a sustainable way of reducing the need to travel. At various times in its evolution the allocation has been geared to achieve such a scheme. However, as now presented to the inquiry, the council seeks a development for employment purposes, limited to Class B1 uses. In my view the council is justified in no longer pursuing the mixed use option. The site is located within the broad swathe of industrial development on the western edge of the town. Apart from small groups of housing this area is entirely in employment use. Housing development on the site would be isolated from other main areas of housing and from the necessary support services and facilities. Any benefit from having homes and jobs on the same site would be more than negated by the poor, isolated environment for what would be a small enclave of housing.

10.3 Further, as I have concluded elsewhere, I am concerned about the balance between housing and employment in Yate. There is evidence of an imbalance between the two, with considerable numbers of residents commuting out. This site offers the opportunity to redress both a shortage and an imbalance in the supply and type of employment site. There is, otherwise, very little land immediately available for new employment development. Those premises that offer the opportunity for improvement or redevelopment are mainly suitable for industrial or warehousing activities. This site offers an important chance to provide for new employment development which, in the form of offices, would help to improve the range and type of jobs available in the town.

10.4 The site has remained undeveloped since its original allocation and there continues to be vacant premises available. Given the lack of available sites and the unsuitability of most premises for B1 uses I am satisfied that it is necessary and appropriate to allocate this site for B1 development. It is important for the town to have the opportunity to develop and extend its employment base and become more self sufficient in employment terms.

10.5 Concerns have been expressed about the impact of developing this land on traffic conditions. I have no detailed evidence on this point, but from my observation in the area I have no reason to see this as a compelling argument against development proceeding here. Whilst there is undoubtedly heavy traffic on nearby roads, with congestion at times, I do not believe that this is at an unusually high or unacceptable level as to weigh against a scheme progressing.

10.6 Of more concern is the impact of a development upon the rural character of the area and the residential amenities of those living in Stover Road. The site, as shown on the revised deposit Proposals Map, extends to the rear of the Stover Road residential properties, but stops short of the wildlife corridor running along the Frome river. At the inquiry in 1989 the Inspector commented that the allocation should not include the land to the rear of numbers 43 to 49 Stover Road. I see no reason to differ from that. To revert back to the smaller, 2.5 hectare site would, in my view, help to reduce impact on the more rural character of this part of the area and also help to limit the impact on residential amenity. I recommend accordingly. The proposed supporting text, as proposed to be changed, recognises the importance of the ecology of the area and the need to protect the visual amenities of local residents.

10.7 I consider in the strategy chapter the issue of how much development should be provided in Yate. Suffice it to say here, I am fully satisfied of the need to make this site available for B1 uses. It adjoins the existing built-up area and lies outside of the green belt. It is a suitable site that should make a useful contribution to meeting the employment needs of the town.
Recommendation

10.8 I recommend that the local plan be modified
i) in accordance with the PC 167 A to F, and
ii) by the exclusion of the land to the rear of 43 to 49 Stover Road from the site.

11. Policy E01 - Yate and Land North of Yate

Objections

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<td>268/003</td>
<td>Heron Land Developments Ltd</td>
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<td>P &amp; A Bennett</td>
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These objections seek additional employment provision in Yate. I consider this issue in the strategy chapter of my report.

12. Policy E01 - Thornbury

Objections

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<td>Mr G Lanfear</td>
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These objections seek additional mixed use provision in Thornbury. I consider this issue in the strategy chapter of my report.

13. Policy E01 - Severnside - General

Objection

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Severnside is considered in detail in the strategy chapter of my report.


Objections

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Severnside is considered in detail in the strategy chapter of my report.
I consider Severnside in the strategy chapter of my report.

15. **Policy E02 and Paragraphs 7.39-7.51 – Criteria for assessing proposals for employment development within the urban area, defined settlement boundaries and/or permitted by policies E3/E5/E6**

**Objections**

<table>
<thead>
<tr>
<th>Objection No.</th>
<th>Name of Objector</th>
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**Support**

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**Issues**

- Is the policy too onerous, does it give sufficient guidance?
- Should the policy refer to B1, B2 and B8 use classes?
- Is the definition of large scale uses appropriate?
- Are Emersons Green Area B and Cribbs Causeway able to accommodate large scale B8 uses?
- Should reference be made to science based uses at Emersons Green?
- Should the policy allow for rail served distribution proposals?

**Reasoning and conclusions**

15.1 This policy seeks to provide the criteria by which to assess proposals for employment development, including in residential areas. Along with policy E3, this allows for the bringing forward of small sites across the district. I do not agree with the objection suggesting that the policy is too onerous and would discourage new development. The policy is a permissive one, setting out the criteria that will need to be met. None of these are unreasonable. They are all matters that would have to be considered when assessing individual proposals. They do not conflict, in my view, with the advice in PPG1 and PPG4 and the support to be given to employment development.
15.2 The criteria are expressed in general terms as matters that will need to be taken into account. To that extent they do not provide unequivocal guidance as to what would be acceptable. The acceptability of any particular proposal will depend on the particular circumstances of the proposal and its location and surroundings. The criteria provide a realistic and reasonable checklist of matters that will need to be taken into account. There is some merit in the view that the criteria are common to any form of development, and best could be set out in an all-encompassing policy such as policy D1. That would avoid unnecessary duplication. In part this is a presentational matter. I conclude that the matters covered in the policy are material to the consideration of individual proposals and that they are usefully set out here.

15.3 The policy refers to uses within the B Classes. Where any policy differentiates between different B Use Classes, then it is always helpful to be quite specific about the relevant use class. Here, the policy is aimed at employment development and the reference to B1, B2 and B8 use classes begs the question of how sui generis employment uses are to be considered. There is no problem within existing employment areas as policy E3 implies that any employment use, whether B Class or sui generis, would be acceptable there. However, elsewhere it is not clear as to how sui generis employment uses will fall to be considered. The purpose of the policy is to provide guidance for employment uses per se. I see no benefit in restricting the guidance to those that fall within the B Classes. To bring the two policies into line and to provide a complete guide I recommend that the first sentence of the policy be reworded to refer to employment uses.

15.4 The policy makes specific provision for B8 uses. This is now defined, in paragraph 7.44, as greater than 500 square metres floor space, not ancillary to other employment activities on the same site and likely to generate significant HGV traffic requiring ready access to the strategic road network. The council seeks to direct large scale B8 uses to certain locations to ensure that HGV traffic has ready access to the strategic road network, avoiding the possibility of nuisance to residential areas and to assist in retaining existing sites in more intensive employment activities, with higher employment densities.

15.5 I share the objector's concerns that such an approach could reduce the adaptability of existing estates to accommodate the needs of businesses in a flexible manner. The definition of large scale is set at 500 square metres. This seems to me to be quite small. A B8 use of that size would not necessarily generate a large number of HGVs that required access to the strategic road network. Many industrial estates successfully contain a mix of industries, including B8 users. Many B8 users could be assimilated into areas other than the strategic ones listed in the policy. In order to provide greater flexibility to the development of sites and the re-use of existing premises I recommend that the threshold figure be raised. I suggest a doubling to 1,000 square metres, in itself not a large size for B8 activities. The larger B8 uses would continue to be directed to the specific strategic locations.

15.6 There are few, if any, areas within Emersons Green Area B or Cribbs Causeway that are still available for development on the scale to accommodate B8 uses of more than 1,000 square metres. Much development has taken place and many of the remaining sites have extant planning permissions. If sites are not, realistically, likely to become available for B8 uses in these areas, then there is little to be gained by including them within the policy. In the absence of detailed evidence on this point, I invite the council to reconsider the appropriateness of these areas being identified for large scale B8 occupiers in the light of the potential availability of space there. The possible paucity of suitable sites within these two areas could mean that only Severnside can be identified for large scale B8 users. If this is the case, that would give very little locational choice to potential businesses and severely reduce flexibility in this area of the market. This serves to reinforce my recommendation to raise the threshold to 1,000 square metres.
15.7 In response to the objection from Network Rail (made in the name of Railtrack) the council indicated that it was happy with the principle of supporting rail served distribution proposals. As long as site specific objections could be overcome it would be supportive of such proposals. Proposed change PC144 offers support for rail connected warehousing. At the inquiry additional wording was agreed between the parties, as proposed changes PC144A and PC144B. This supports the aim of increasing rail freight opportunities, in line with national guidance. I recommend accordingly.

15.8 The Highways Agency’s concern about the impact on the trunk road network is recognised in criterion B - developments should not give rise to unacceptable levels of vehicular traffic. This assessment will include any impact on the trunk road network. The Emersons Green science park benefits from an outline planning permission and is addressed in policy M3. I see no advantage in making reference to it in this policy.

Recommendation

15.9 I recommend that the local plan be modified by
i) the rewording of the first sentence of the policy to read: "Proposals for employment uses within the existing........"

ii) in accordance with PC144, PC144A and PC144B,

iii) the figure of 500 square metres, in paragraph 7.44, being raised to 1,000 square metres.

16. Policy E03 and Paragraphs 7.52-7.56 – Safeguarded employment areas

Objections

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<tr>
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Support

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<tr>
<td>403/007</td>
<td>Hartwell Plc</td>
<td>E03 7.55</td>
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Issues

Is the policy clear as to proposals for employment in these areas?

Is the policy necessary – is it too negatively worded? Should it be more permissive of alternative uses? Should it provide for supportive non-employment uses?

Whether policy E3 is inconsistent with proposals to reallocate employment land in the North Fringe to residential use?

Whether Backfield Farm, Engine Common should be shown as an industrial site?
Reasoning and conclusions

16.1 This policy relates to 39 employment areas identified on the Proposals Map which the council considers are capable of continuing to offer accommodation for employment in preference to other uses. It is aimed at safeguarding these sites for employment uses. However, the policy as worded does not directly do that. Rather, it concentrates upon the approach to non-employment uses. By implication, it is supportive to employment proposals within these areas, but it does not actually say that. To clarify the approach to employment proposals within these areas, the policy should begin with a positive statement to the effect that proposals for employment uses would be supported in these areas. This can also make explicit in this policy that proposals would be tested against the criteria set out in the previous policy. Those criteria cover the concerns expressed about how travel intensive uses will be considered.

16.2 The policy covers sites across the district that together provide a network of locations offering employment opportunities for local residents. Maintaining this spread of opportunities is a sustainable approach. Many of the areas are densely developed and are of an industrial nature and as such, they do not offer suitable locations for non-employment activities. In my view it is important to retain these areas. Although the district-wide employment land supply figures suggest that there is more than ample supply of employment land, these figures are skewed by the very large amount of land that is available at Severnside. I comment more fully on this in item 4 above and in the strategy chapter of my report. There is not an oversupply of employment land. Rather, it is essential that a tight rein be kept on the existing supply to ensure that these areas are not lost and that a shortage of employment land does not result.

16.3 Accordingly, I am satisfied that the local plan should include a list of this scale and that it should take a negative attitude to the loss of sites within these areas to non-employment uses. I consider the stringent tests within the criteria are justified. They do not preclude non-employment uses. However, any loosening of them could lead to a harmful diminution of this important, sustainable source of employment land. The exception to this is where non-employment uses would expressly support the employment base in the area. Such uses could help to improve the sustainability of an area. A minor change to criterion A could take this on board.

16.4 The reallocation of sites in the North Fringe from employment use to residential is considered in the strategy chapter of my report. There, I am satisfied that, for strategic reasons, it is appropriate for some former employment allocations/commitments to be reallocated for residential purposes. That, in turn, re-emphasises the importance of maintaining the employment base provided by the existing employment areas. Those employment areas coming forward in the North and East Fringes are covered by policy E1.

16.5 Finally, the list of sites generally includes the larger, more important employment areas. It does not aim to include all sites or properties that provide employment. I see no convincing reason why Backfield Farm should be included within the list.

Recommendation

16.6 I recommend that the local plan be modified

i) by rewording the policy to read: "Within the employment areas defined on the Proposals Map and listed in the schedule below, planning permission will be granted for employment generating uses, subject to the satisfaction of the criteria set out in policy E2. Planning permission will only be granted for non-employment purposes where it can be clearly demonstrated that: ......."
ii) by the rewording of criterion A to read: "The proposal would support or would not prejudice...."

17. Policy E03 - Severnside (10)

Objections

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I consider the Severnside area in the strategy section of my report.

18. Policy E03 - Longwell Green (13)

Objections

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Issue

Should this site continue to be safeguarded for an employment use?

Reasoning and conclusions

18.1 The objectors seek the exclusion of this 2.8 hectare site from the employment safeguarding and its redesignation as a residential allocation. This site has been the subject of extensive coal mining operations in the distant past and has lain vacant for some considerable time. The council accepts that is a previously developed site but wishes it to remain safeguarded by policy E3.

18.2 I have considered the adequacy of the employment land supply in the strategy chapter of my report. The district-wide figure is inflated by the Severnside situation. In the rest of the district there is an adequate supply, notwithstanding my support for the redesignation of former employment sites to housing in the North Fringe. Those redesignations are linked to a strategic imperative. I do not consider that that position can be repeated here. Whilst there remains an adequate supply, that is all it is. The supply should provide for a reasonable choice and range of sites.

18.3 At a more localised level there is little supply of new sites in this part of the district. Most of the land identified in Appendix 11 as being available for employment purposes is in the North Fringe or at Emmersons Green or other areas remote from the Longwell Green/South Kingswood area. There are established employment areas within the immediate residential area, these providing some potential for local people to work locally. Nevertheless, there is still a very strong outflow of workers from this area, which any new employment development in the area
could help to address. The council points to the paucity of suitable sites to accommodate firms relocating from this area. This land has the potential to help make the area more self-sufficient and sustainable. Overall, I consider that there are strong grounds in terms of the need for employment land to justify the retention of this site within this safeguarded employment area.

18.4 However, there are other factors to be taken into account; how likely it is that the site would come forward for employment use and whether the site would better be identified for housing to help meet the overall housing requirement of the district. Looking firstly at the site specific considerations, there is clearly a difficulty that arises from its historic use for mining. The objector has submitted details of the costs of remediation of the site that suggests that an employment proposal would not be realistic on this site.

18.5 If the site is to be developed works are clearly necessary to stabilise the site and make it suitable for buildings. The cost of remediating the entire site such that a building development could be placed anywhere upon it was estimated, in 1999, at £1.7M. It seems to me that the development of the site need not be dependent upon the whole of the site being fully restored to a point that it would be capable of having buildings on it. Clearly, remedial costs could be much reduced from that figure if they were to be geared to a scheme that involved only partial building cover, with other uses, such as car parking upon the otherwise more costly parts. In this way there seems to be more realistic prospects of achieving a positive site value and, in turn, a viable scheme.

18.6 From my reading of the various consultants’ reports it seems to me that the results err on the pessimistic side, with the viability, in part at least, being influenced by the historic cost of the site. There may well be another scenario in terms of the type and nature of the employment use proposed that would be more realistic. There is sufficient uncertainty in these respects that the evidence on development value generated by an employment scheme does not come down conclusively against achieving a viable employment scheme. Bearing in mind the points raised above, it seems to me that there would be scope for an employment scheme that recognised the particular circumstances of the site and was geared to carefully reflecting them. I am not persuaded that a viable employment based scheme could not come forward for the site and, on balance, consider that realistically one could.

18.7 I fully acknowledge that the site remains undeveloped at present. I also accept that compared with other sites this one is at a disadvantage because of the need for a significant level of remediation. This is in a context of the site not being a particularly attractive one for office development, together with a not very buoyant local property market for other business users. However, there does not appear to have been a very active marketing of the site and I do not believe that all the options, across the full range of employment generation, have been fully considered. In these circumstances I conclude that whilst the site has some significant problems, it is not unrealistic or unreasonable to conclude that the site could be developed in the future for an employment related use.

18.8 As regards the alternative of making this land available for housing, I recognise that such a scheme would be a viable proposition, with the higher value use being capable of achieving a development, notwithstanding the remedial costs. Elsewhere in my report I have identified a significant shortfall in the supply of housing land. This calls for the identification of further sites that can be developed without delay. I place great emphasis on the achievement of the housing requirement I identify in my report. This site could assist in that and at the same time bring into use a previously developed site, a matter to which I also give considerable weight. However, having considered the options across the district of meeting the housing land supply needs, I do not believe that this site should be given a high priority. There are more sustainable options available elsewhere. Outside of the North Fringe, where particular circumstances require a different approach, I have supported the council’s approach of retaining its employment allocations and safeguarding. In that context, here, an employment use would help to improve the balance between homes and jobs within this residential area. So, whilst a
residential scheme would have a much greater certainty than an employment one, this should not, in my view, override the advantages of retaining it for employment purpose.

18.9 One matter that adds a little more weight to this view is the site suitability for a residential development. Whilst the site generally meets the criteria in paragraph 31 of PPG3, it is surrounded by retail and industrial/commercial uses. It is isolated from the immediate residential area. Residents of a housing scheme could be subject to some noise from the adjoining activities and conversely, the presence of a sizeable residential development could, in due course, inhibit the operations of the surrounding commercial activities. This is not an ideal site for housing, albeit, this is not a decisive factor in my decision. Had I come to a different view on the principal matters, then I would not have seen the disadvantages of the site precluding a residential allocation.

18.10 In conclusion I fully recognise the national imperative to bring land forward for housing including previously developed land and that previously designated for employment. However, I believe that there remains a reasonable likelihood of an employment proposal coming to fruition here. In particular, the advantages of retaining the site for an employment use outweigh the greater certainty of achieving the development of this previously developed site and the provision of new housing. The retention of this site for employment purposes, reflecting policy 30 of the JRSP, is supported.

18.11 One final matter raised by the objectors, that sites may no longer be capable of employment use is recognised in paragraph 7.56 of the plan. I see no need to add to this a specific reference to remediation costs. Economic viability will be one of the main reasons why a site may not be any longer capable of employment use.

Recommendation

18.12 I recommend that no modification be made to the local plan.

19. Policy E03 - Hewlett Packard (26)

Objections

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These objections raise issues relating to the amount of employment land to be provided in the North Fringe area generally and on the Hewlett Packard site in particular. Both these issues are considered in detail elsewhere in my report, in chapters 2 and 8a.

20. Policy E03 - Station Road, Charfield (29)

Objection

<table>
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<th>Objection Number</th>
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<tbody>
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<td>441/020</td>
<td>Redrow Homes (South West) Ltd</td>
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Issue

Whether the site should be omitted from policy E3, to allow for a redevelopment for housing and a railway station.
Reasoning and conclusions

20.1 In chapter 8a of my report I have recommended that the objector's proposals for Wotton Road site in Charfield not be supported. That scheme would have allowed for a small area of commercial development, possibly to be taken up by Fews Garage, who currently occupy this site. In chapter 6, I have also supported the identification of land to be reserved for a station, under policy T1(3).

20.2 The Fews Garage dealership provides an opportunity for local employment. In my view it is important to retain sites such as this in employment use in order to reduce the need for residents to have to commute to the main employment areas of Bristol and the North Fringe. Even with the opening of a rail station here, I do not consider that this would justify the replacement of this employment site by more housing. Whilst the sustainability of the village would improve with the opening of the station, this does not make the village a particularly sustainable place compared with the larger settlements with good accessibility to Bristol City Centre, and the other major employment areas.

20.3 Even with the opening of the station I would not describe the village as being a node in a good public transport corridor. The frequency of the train services and the bus routes serving the village are not so good as to warrant this village materially rising up the priorities in terms of the sequential search for housing sites. In any event, I consider that it is important to maintain, at the least, the existing balance between housing and employment in the village. To allow this site to move from employment to housing would, in my view, unacceptably alter the balance between homes and jobs, with the result that the village would be less self sufficient and that more people would be likely to have to travel further for their work.

Recommendation

20.4 I recommend that no modification be made to the local plan.

21. Policy E03 - North of Douglas Road, Kingswood (32)

Objections

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</table>

Issue

Should this site be allocated for housing and/or other uses?

Reasoning and conclusions

21.1 The revised deposit draft plan redesignated part of the safeguarded employment area north of Douglas Road, an underused car park, for housing leaving the balance of the site covered by policy E3. The balance remaining comprises an office building and industrial units which the council considers are capable of beneficial reuse. I find no strong reason to differ from that view. It is important to retain local employment sites where they are capable of continuing to provide employment. There are relatively few such sites within the built-up area of Kingswood. Its retention for employment purposes would help to provide local opportunities for work for the large resident workforce and so help to reduce the potential level of out-commuting.

21.2 In the housing chapter I have recommended a substantial increase in the provision of land for housing. However, that does not justify the release of sites such as this which provide
scarce, valuable employment opportunities in a residential area. To lose sites such as this would worsen locally the imbalance between jobs and homes. The plan identifies employment land to the south and the adjoining car park for housing. Those developments will take advantage of the area's location to achieve high density development. However, to continue this process on the objection site would further exacerbate the imbalance between homes and jobs. I am satisfied that the shortfall in housing land can be made up without having to lose important employment sites such as this.

Recommendation

21.3 I recommend that no modification be made to the local plan.

22. Policy E03 - Ansteys Road, Hanham (33)

Objection

381/001 Farepak Plc E03 7.52-7.56

Issue

Should the site be reallocated for housing or a mixed use?

Reasoning and conclusions

22.1 It is important to retain local employment sites where they are capable of continuing to provide employment. I appreciate that the land is tightly constrained by housing and that the longer term occupation of this site by commercial activities would continue to have the potential for conflict between the businesses operating here and the surrounding residential community. Nevertheless, whilst the location may not be ideal the site does provide the opportunity for people to work locally. I do not consider that the disadvantages of this location are so severe as to warrant the loss of this site to housing. There are relatively few such sites within the built-up area of Hanham. Its retention for employment purposes would help to provide local opportunities for work for the large resident workforce and so help to reduce the potential level of out-commuting.

22.2 In the housing chapter I have recommended a substantial increase in the provision of land for housing. However, that does not justify the release of sites such as this which provide the potential for scarce, valuable employment opportunities in a residential area. Whilst I fully recognise that this site could otherwise make a valuable contribution to meeting housing needs, I am satisfied that the shortfall in housing land can be made up without having to lose important employment sites such as this, worsening locally the imbalance between jobs and homes. In my view the site's retention as an employment area would be in accord with JRSP policy 30 and national guidance.

Recommendation

22.3 I recommend that no modification be made to the local plan.

23. Policy E03 - Tower Road, Warmley (35)

Objection

419/001 Warmley Investments E03
Issue

Should part of the site be excluded from the safeguarded employment area and made available for housing or other development?

Reasoning and conclusions

23.1 The objection site forms a small part of a much larger employment area. The objectors are seeking the removal from the safeguarding area the area of land north of Boston Brook, which they consider relates better to the adjoining residential properties, allotment area and the wider area. A related objection to policy H1 seeks its use for housing or complimentary use.

23.2 It is important to retain local employment sites where they are capable of continuing to provide employment. I appreciate that the land is physically separated from the main body of the employment area by the brook and a line of trees. I also appreciate that site would be capable of development for non-employment uses without causing amenity problems. However, in townscape terms I can see little real advantage in a non-employment development along this frontage, creating a continuous frontage to Tower Road North. Parts of the frontage in the area are open in character and no purpose would be served in this sense by extending housing along the frontage of this site.

23.3 Whilst I accept the exclusion of this site from the employment area would not prejudice development within the body of the safeguarded area I do not consider that the disadvantages of this location are so severe as to warrant the loss of this site to housing. There are relatively few employment sites within the built-up area of Kingswood. Its retention for employment purposes would help to provide local opportunities for work for the large resident workforce and so help to reduce the potential level of out-commuting.

23.4 In the housing chapter I have recommended a substantial increase in the provision of land for housing. However, that does not justify the release of sites such as this, notwithstanding its previously developed nature, which provide scarce, valuable employment opportunities in a residential area. I am satisfied that the shortfall in housing land can be made up without having to lose important employment sites such as this, worsening locally the imbalance between jobs and homes.

Recommendation

23.5 I recommend that no modification be made to the local plan.

24. Policy E03 - Hanham Business Park (38)

Objection

204/001 Logersham Developments E03

Issue

Are there exceptional circumstances here to justify the moving of the green belt boundary to accommodate an expanded industrial area?

Reasoning and conclusions

24.1 The objection supports the designation of the Hanham Business Park as a safeguarded employment area under policy E3. It is seeking an extension to the employment area to include a substantial area of land to the south west which is currently within the green belt.
24.2 The line of the green belt shown in this plan is as was included in the 1991 Kingswood Local Plan. It runs to the rear of adjoining residential property and then cuts across the rear of the business park, incorporating within the green belt a small area of open ground enclosed within the business park by a fence. The bulk of the objection site comprises a recolonised spoil tip with woodland on its slopes. It is at a higher level than the business park and visually is to be seen as linking with the open, undeveloped Avon valley to the south. I have no doubt that this area fulfils a number of the green belt purposes set out in paragraph 1.5 of PPG2. In particular it contributes to checking the unrestricted sprawl of the built-up area and preventing neighbouring areas from merging. Accordingly, I consider that the green belt boundary properly includes this area of land.

24.3 Development on the crown of this area would be partly screened by trees. However, as the land is elevated and conspicuous in the wider landscape, I have no doubt that it would be visible and would reduce the perception of a gap between Hanham and Brislington provided by the Avon valley. In my opinion, this area physically and visually links in with the wider open, undeveloped areas of the Avon valley. In my view development here would cause substantial damage to the green belt and to the appearance and character of the wider Avon valley.

24.4 The business park has been operating successfully and is looking for an opportunity to expand to allow both consolidation and re-planning of the estate, providing longer term viability. With the larger area it would be possible to make more efficient use of the existing estate, rationalising the layout, allowing for individual businesses to expand and to enhance the visual amenity of the estate. I have no doubt that the expansion of the estate would enable improvements to the operation of the estate as a whole and to individual businesses. This could increase the amount of local employment available for the adjoining residential areas. The expansion of this employment area, to allow for existing firms to expand and for new ones to come in, would help to provide more jobs locally for the surrounding residential area.

24.5 However valuable in economic terms, I do not consider that these matters can be said to constitute the exceptional circumstances required by paragraph 2.7 of PPG2 if a change in the green belt boundary is to be justified. The desire of the objector to expand the business park falls well short of the level of justification needed to constitute exceptional circumstances. As I have said, I consider that the area of the spoil tip fulfils green belt purposes. The green belt boundary, with one minor exception, was logically drawn. Exclusion of the spoil tip from the green belt would allow for development which would result in serious harm to the character and appearance of the wider area. Thus I do not support the main element of the objector’s position.

24.6 I do consider, however, that there is a case to support a very minor change in the green belt boundary to reflect the position on the ground as it is now. The green belt boundary follows clearly defined defensible boundaries on either side of the business park. However, it crosses the commercial area on a line that is undefined on the ground. That is not so unusual in itself, but here I consider that there is a more logical line that can be taken without harming the function of the green belt.

24.7 The boundary currently crosses a small area of consolidated ground that appears to have been used and is now used for car parking and for storage as part of the operation of the estate. This land relates to the business park and not to the rising ground to the south of the recolonised spoil tip. It is separated from that rising ground by a wire fence. In my opinion that fence would make a much better, clearly defined and defensible long term line for the green belt boundary to follow. I note that the legal status of the small piece of land involved is uncertain. However, it is only a very small piece of ground. It serves no green belt purpose in itself and because of the topography of the ground and the use made of it, it is very much perceived as being part of the business park and not part of the undeveloped land to the south.
24.8 I consider that because of the anomalous nature of the boundary at this point that a minor adjustment to the boundary is justified in this case. The circumstances are exceptional and unique to the particular situation to be found here. Such a minor change would not conflict with the guidance in PPG2.

**Recommendation**

24.9 I recommend that the local plan be modified by the redrawing of the green belt boundary to follow the line of the fence at the rear of the business park so as to exclude the small area of hardstanding from the green belt. This small area should be added to the safeguarded employment area under policy E3.

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25. **Policy E03 - Bath Road, Bridgeyate (39)**

**Objections**

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<td>E03</td>
</tr>
<tr>
<td>472/001</td>
<td>Mr M P McBraida</td>
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</table>

**Issue**

Whether the land south of Francis Way should also be included in the employment area?

**Reasoning and conclusions**

25.1 The objection site extends to about 0.3 hectares. It comprises an area of grassland on the south side of Francis Way, a new access road serving a modern housing estate to the west. That road severed this area of grassland from the main McBraida factory site to the north. It had previously been part of the factory site, and some use had been made of it, though the extent and nature of usage is not entirely clear. At the current time the land forms an attractive open entrance into the housing development beyond.

25.2 Policy E3 is aimed, primarily, at protecting existing employment areas from loss to other uses. I have recommended that the policy make clear that employment proposals within safeguarded areas will be supported. Thus, inclusion within an E3 area would bring with it some expectation of future employment development. Although the land in question may be said to be previously used in connection with the factory to the north, that use may have been intermittent at best. The site is now cut off from the rest of the employment area and currently is not in employment use. On that basis there is a firm case to say that it would be inappropriate to apply policy E3 to the land.

25.3 However, historically there is a link. There is also a longstanding ownership link. The factory has expanded over the years and the company, understandably, are seeking to protect their long term position, with an eye to longer term, continued expansion of the business on their land. If protected by policy E3 that would, in the objectors' view, give a little greater certainty as to the appropriateness of an employment use on the land, it being defined as being within an employment area. Whilst the expectation of employment development may be there with inclusion within policy E3, there are other hurdles to cross.

25.4 Any proposal for employment development, whether within or outside a safeguarded employment area, would still fall to be considered under policy E2. The council is rightly concerned to ensure that the attractive entrance to the residential area is retained and is not spoilt by what it sees as harmful development. It indicated that it would be unhappy with built development or open storage on this land. There may be some scope for some car parking on this site, if implemented in a sensitive manner. However, that is not for me to determine.
25.5 On balance I come to the view that the site should not be included within policy E3 as a safeguarded area. At the current time it clearly is not in employment use. It provides a valuable and attractive open area which contributes to the visual quality of the area. If development proposals come forward then these would have to be judged on their merits in terms of policy E2 and others in the plan, regardless of whether the site was within a policy E3 area or not. I fully appreciate the value of this factory and the employment it provides and the supportive guidance in PPG4. However, I conclude that in practice its inclusion within an existing employment area, under policy E3, would give little practical assistance to the company and that any proposals would best be considered on their merits under the terms of policy E2.

Recommendation

25.6 I recommend that no modification be made to the local plan.

26. Policy E03 - Land at Coldharbour Lane

Objection

449/019 University of the West of England E03

This objection is considered under item 16 in the housing chapter.

27. Policy E03 - Westend, Marshfield

Objection

293/002 Mr G H England E03

Issue

Whether the site should be excluded from the green belt and identified for employment?

Reasoning and conclusions

27.1 The objection site lies within the green belt, on the western edge of Marshfield. It comprises an existing warehouse site and an area of grassland to the south. In my view no exceptional circumstances exist here to justify the changing of the green belt boundaries, as required by paragraph 2.7 of PPG2.

27.2 The council does not make any employment allocations in Marshfield. That is not a shortcoming that requires changes to the plan. Employment land proposals are concentrated in the main urban areas, where accessibility is at its greatest. In terms of the plan's overall strategy it would not be appropriate to seek to find new employment generating developments in the more remote rural settlements. The plan does allow for small scale employment developments within settlements, so the opportunity is available for such schemes to come forward within villages. The plan, however, is very restrictive as regards employment development outside settlement boundaries, as is the case here.

27.3 I acknowledge that this is an established site with substantial buildings upon it. That, however, does not justify its exclusion from the green belt. It forms part of the green belt setting of this edge of the village. Any expansion of employment development here would be damaging to the purposes of the green belt. As well as being visually damaging to the green
belt, it would be likely to cause harm to the character and appearance of both the AONB and to the village Conservation Area.

27.4 I find no exceptional circumstances to warrant a change to the green belt boundary and consider that the objector's proposals would be likely to cause significant harm to this edge of the village.

**Recommendation**

**27.5 I recommend that no modification be made to the local plan.**

---

**28. Policy E03 - Land at Wyck Beck Road, Brentry**

**Objection**

87/001 Ashfield Land Ltd E03

**Issues**

Should more employment land, in the form of a business park, be provided in the North Fringe?

Is this a suitable and sustainable site for such a proposal?

**Reasoning and conclusions**

28.1 This site extends to about 32 hectares and comprises open fields between the Avonmouth/Filton railway line, to the south, the administrative boundary with Bristol City, and Cribbs Causeway and the Filton airfield to the north and north east. It lies within the North Fringe, within the Bristol PUA. It is not subject to any restrictive designation in the draft local plan. The objectors seek the allocation of this land for a business park, envisaging about 70,000sqm of class B1(a) and (b), providing about 4,000 jobs. In addition a hotel with conference facilities would be provided, together with small scale ancillary uses, the balance of the site to be landscaped. Land would be reserved for a passenger railway station and bus interchange. A new bus link would be established through to Cribbs Causeway.

**Employment land in the North Fringe**

28.2 The North Fringe has clearly been a major contributor to recent growth in Bristol's economy, and in turn has made a very important contribution to the economy of the northern sub-region of the South West and to the South West region generally. There is no doubt that the Bristol area, and the North Fringe in particular, are important drivers of the region's economy. The North Fringe has accommodated very significant levels of economic growth in recent years, including at least 60% of the growth in office space in the whole of the Bristol area. The North Fringe now provides jobs for over 60,000 people. This importance is recognised in the Aims, Visions and policies of the RPG10, such as SS1. The RPG recognises the important role of Bristol in the region and that an adequate supply of employment land must be provided to secure the growth necessary for regional prosperity.

28.3 Likewise, the JRSP recognises the economic strengths of the area in which the North Fringe plays a significant role. It is concerned to ensure that the economic prospects are not harmed and that business and employment opportunities are not eroded. Alongside this recognition of the economic role and importance of the area, the JRSP in its locational strategy seeks to secure a more balanced pattern of housing and employment across the area by a range of policies including the restraining of the expansion of employment uses in the North Fringe. Policy 12 spells out more detail. Alongside the balancing of employment with housing...
in the North Fringe the restraint on employment land in the North Fringe is linked to the objective of regeneration in the South Bristol and Weston-super-Mare areas.

28.4 Clearly, the JRSP does not call for an embargo on any further employment development. Such an approach could seriously harm the local, and in turn, the regional economy. It envisages that new sites will come forward. The key question to be answered is how much land should be made available to satisfy both the economic aspirations and those concerned with realigning the balance of development within the North Fringe. I have commented upon this issue in chapter 2 of my report, but repeat much of the argument in relation to class B1 development here.

28.5 Over the past fourteen years the average rate of office land take up in the North Fringe has been 8.61 hectares. This figure has been somewhat distorted by two very large schemes, the MoD and Sun Life developments. Taking those out of the equation, the annual take up rate of land for offices in the period 1989 to 2003 has been 4.50 hectares per annum. Applying this rate over the remaining 8 years of the plan, from 2003 to 2011, this equates to a need for 36 hectares.

28.6 Offices have been by far the main element of the growth in employment in the North Fringe, about 80% of all employment land development in this area has been for offices. I see no reason to think that this picture will not continue. Estimates advanced at the inquiry suggest that about 37 hectares of land would be suitable and available for office development in the plan period. This figure allows for half the Northfield employment allocation being available for offices and for 17.8 hectares of land at Hewlett Packard being also retained for office use. I find no reason to quarrel with the land availability position as set out above. It is reasonable to allow for half of the Northfield site to be developed for offices, though there is no strong reason why the whole 14 hectares could not be made available for offices were the need to be shown. I have given detailed consideration to the Hewlett Packard site in chapter 8 of my report. There I have supported the allocation of a further 6.9 hectares of the employment land for housing. This would mean reducing the overall supply of land suitable for offices of about 30 hectares. On an annualised rate this equates to 3.75 hectares a year.

28.7 The key question is whether supply of the scale of about 30 hectares suitable for offices, is too much, too little or sufficient for future needs having regard to the national, regional and strategic advice and guidance. The use of past trends is of limited assistance in this. The thrust of the JRSP as regards the North Fringe is to turn round past trends and use opportunities that arise to provide housing to redress the current imbalance.

28.8 There has been a suggestion that the JRSP imperative as regards the North Fringe was conceived in the context of a very large excess of employment land over demand, that the policy of restraint reflected there being, at the time, over 200 hectares of employment land provisionally available in the North Fringe area. The situation in this respect is not entirely clear, though the Consultation Draft of the local plan would have been public then. The council suggests that the Panel knew of steps already in train to substantially reduce the overall amount of potential employment land.

28.9 However, whatever the context of potential land availability then and now, it is clear from reading the JRSP, policies 2 and 12, that the plan seeks to secure a better balance between housing and employment and to restrict provision of new employment sites to those which are suitable only for employment uses. A restructuring of the area is being called for. Particularly telling in this respect is the comparison of economically active and jobs in the North Fringe. In 1991 there were 21,000 economically active and 35,000 jobs, an excess of jobs of 14,000. By 2001 the number of jobs had risen to nearly 59,000 whilst the economically active population rose by nearly 9,000, giving an excess of jobs of 29,000. The council predicts that in 2011 even on the basis of the plan’s reduction in employment land and its housing allocations jobs would have risen to 72,000, with economically active at 39,000. That means that even with the
measures being taken by the plan the excess of jobs over the economically active population
would have continued to rise, to over 33,000.

28.10 The council has not advanced any model of the desired mix of employment land and
housing land that should be aimed for nor any formula of how much new employment land
there should be in relation to the scale of residential development proposed. It is, therefore,
much more of a subjective process to determine how much employment land should be made
available. The plan clearly does not draw a line under past employment land provision and stop
all future employment development potential. The guidance does not call for a complete halt.
To do so could seriously harm the vitality of the area and its contribution to the economic
wellbeing of Bristol and the northern sub-region.

28.11 On paper the provision of about 30 hectares of employment land suitable for offices
seems not ungenerous. It allows for an annual rate of 3.75 hectares of offices, assuming only
half of the Northfield site were used for this purpose. However, not all of this is immediately
available. It is important to provide a range and choice of sites. Not all sites allocated are
likely to be completely developed by 2011. Some sites, such a the Hewlett Packard land, are
very much linked to the expansion of existing enterprises, being held in effect as reserve sites
and may not become available on the open market. Nevertheless such land should count as a
potential supply of office space over the plan period. Even so, there is still a significant amount
of land with office development potential available. Given that there is now only 7 years to run
of the plan period I find little support for the argument that the potential of 30 hectares is too
little and could harm the economic prospects of this key area. It allows for office
developments to continue, at a slower rate that reflects the JRSP's concerns. It allows for
considerable areas of land to be reallocated or identified for housing. It is not so limited as to
reduce the opportunity for some continued growth which reflects the economic importance of
the area. I do not consider that this level of provision would harm the role of the North Fringe
as a driver of the economy of Bristol and the wider sub-region.

28.12 The relevant guidance in the RPG, and to a degree in the JRSP, applies to the whole of
the Bristol area, not just one specific part. The JRSP does contain quite specific advice, in
policy 12, in relation to the North Fringe area. The policies should be read and applied in this
context. The North Fringe could not possibly be expected to continue to grow at the
exceptional rate it has over the past twenty years. That would merely be repeating past
events. That is out of the question. Rather, the level of provision provided for in this plan
allows it to consolidate that role, without making conditions worse. The North Fringe should
not be seen in isolation, as a totally discrete area. It is part of a larger urban area. Substantial
employment opportunities will remain at the nearby Emersons Green East site.

28.13 Restraint in the North Fringe is part of a locational strategy aimed at the regeneration of
less fortunate areas. I do not underestimate the difficulties in regenerating the economy of
these areas. Nevertheless, a start has to be made, otherwise the result would merely be a
perpetuation of the recent boom in the North Fringe, with no material progress in the more
disadvantaged areas. In the North Fringe, the plan needs to achieve a very real shift away
from replicating past development trends. For all these reasons I do not consider that there is
a need for the allocation of this site to provide for an additional 16 hectares of land for offices.

The need for a business park

28.14 The issue is not just one of quantitative supply, but also of qualitative supply. Policy
EC3 of RPG10 seeks a range and choice of employment sites. EC4 calls for the identification,
by the Regional Planning Body and SWRDA, of a portfolio of Major Strategic Sites to meet the
needs of major business users or groups of users. The North Fringe has proved very attractive
to such users in the past and there is no reason to think that it could not carry on doing so if
the sites were available and this accorded with planning policies for the area. I accept that the
council should not necessarily await the formal drawing up of a portfolio in the terms of the
policy. Sites could, in principle, be identified by the local plan, albeit there is no specific requirement in the JRSP to do so. However, for the reasons spelt out above, I do not support the identification of a new, major employment site in the North Fringe.

28.15 I accept that large scale business park users are unlikely to find either South Bristol or Weston-super-Mare attractive propositions. I accept, too, that there are unlikely to be suitable sites of the required size in the centre of Bristol and that sites elsewhere may be very difficult to identify. On the other hand, I am not convinced that the only suitable location for a Major Strategic Site is in the North Fringe. Bearing in mind the damage that would be done to the council’s realignment approach to the North Fringe if a large new business park were to be set up there, I am of the view that this is a matter that should be left to a sub-regional/strategic approach through processes other than this local plan.

28.16 It does not appear to me that this is a matter that is so pressing that the local plan should take its own positive approach. Single large occupiers, or small groups of sizeable businesses are by their very nature one-offs and are difficult to anticipate. I have no convincing evidence that there is an immediate need from such an occurrence at this time, or that if there was then it could only be accommodated in the North Fringe. I note the views currently being expressed about the dispersal of civil servants from London. If the situation arises that there is a strong demand for a large site that could only be met in this area, then the council will have to respond to that, outside the local plan and come to a view taking all considerations into account.

The suitability and sustainability of the site

28.17 In some ways this has the potential to be a reasonably sustainable location for development, albeit, its relatively peripheral location in terms of the North Fringe means that there may be fewer opportunities to influence modal choice to nearby destinations. The site adjoins a main bus corridor, albeit provision would need to improve and be altered to serve the site more directly. It also lies alongside an existing railway line, on the route from Avonmouth to Bristol Parkway. This route is capable of carrying passenger services and moves are afoot to introduce such services along the line. However, these moves appear some way from coming to fruition at the current time, though if they did it could significantly improve the accessibility of the site to those using means other than the car. Land can be reserved for a station, though the weight that can currently be given to this factor must very much be tempered by doubts as to the timing and viability of any passenger service here.

28.18 I also have considerable doubts as to the viability of establishing a direct public transport link to Cribbs Causeway. Whilst such a link would be welcome, it seems to me that there would be considerable obstacles in the way of establishing a successful, direct, dedicated link between these two areas. Although on a bus corridor it cannot, currently at least, be considered to be a focus for public transport. Services along the corridor are not at present particularly good. The bus providers would also need to be persuaded to divert some services into the site to encourage usage. Compared with the mixed/employment sites within the North Fringe I do not consider that this is superior in terms of location and the opportunities for influencing modal split.

28.19 I cannot accept the view that in terms of overall journeys to work this would improve the situation. On the contrary, I believe that the establishment of 4,000 jobs in this location would increase the extent of in-commuting to the North Fringe. Earlier in this section I have highlighted the high and growing disparity between jobs and residents in the North Fringe. Adding 4,000 jobs can only worsen the daily pattern of heavy in-commuting, even with the implementation of a green transport plan. I note the view put that there is a large proportion of existing residents who currently leave the area to work. Some of these local people would, no doubt, be able to work locally. However, the suggestion that the addition of 4,000 jobs would somehow improve matters and justify the development is without any credibility. Adding
jobs to this area that already is heavily skewed to employment seems to me to be bound to lead to a substantial increase in the in-flow of workers from outside the area.

28.20 I find the suggestion that local people have certain skills and would be particularly attracted to this type of development pure speculation and without foundation. The net effect of placing more jobs here would be to exacerbate the imbalance between homes and jobs and thereby increase the level of in-commuting from more distant outside areas. Even with the availability of a reasonable level of bus services and a possible train service the evidence is that the development of the site in the manner proposed is likely to materially increase the level of in-commuting into the North Fringe.

28.21 Elsewhere, I have considered the question of the long term protection of this site by way of including it in the green belt. There I have not supported such a change. Since the time I considered the retail appeal on part of the site ten years ago the area has undergone many physical changes and more are in the pipeline. Parts of the site may be thought of as still performing the function of providing an open gap or wedge between the developed areas of Bristol City to the south and Cribbs Causeway to the north. Given the changes that have taken place I am not of the view that the issue of landscape character and function is of such force of itself to justify the local plan providing for its retention as open land. Whilst there may be some merit in keeping open the westernmost fields, I do not consider that such an approach should apply to the whole site and thus condemn this proposal on these grounds.

28.22 On the same basis I do not consider that there are persuasive ecological grounds to resist development of significant parts of the site. Nor do I see any inherent conflict between development and the policy E4 of the draft plan aimed at avoiding any prejudice to the authorised operation of the Filton airfield.

28.23 In conclusion, I consider that the proposals have some merit in terms of widening the range of choice of available land for employment development. However, I do not consider that the advantages in economic terms of providing for a major business park in this area outweighs the current objections in relation to improving the mix of uses in the North Fringe and assisting in the regeneration of other areas. A major employment development here would be inconsistent with the strategic policies of deceleration in the expansion of economic development in the North Fringe, increasing the overall need for in-commuting into the area, and of encouraging growth in the city centre and in less favoured areas. It may well be that with a successful restructuring of the North Fringe and improvements to the scope and range of public transport serving the area that the balance of argument could shift. However, that will be for others to consider at some future date in the context of future development strategies.

Recommendation

28.24 I recommend that no modification be made to the local plan.

29. Policy E03 - Former Railway Station Site, Ram Hill

Objection

474/001 Ms D Parkhill E03

Issue

Should the site be identified as an established employment area?
Reasoning and conclusions

29.1  This land was identified in the Rural Areas local plan, under policy RP16, as an established employment area where employment development would normally be permitted. The supporting text to that policy indicates that in this area particularly sensitive development will be required as it was within the green belt. The current local plan has not included it within the list of safeguarded employment areas under policy E3.

29.2  I support the council in its current position. The site is set within the green belt. Paragraph 3.4 of PPG2 indicates that the construction of new buildings in the green belt is inappropriate, unless it is for one of a limited number of uses. Development for employment purposes is not provided for. It constitutes an inappropriate form of development in the green belt. Local plans should not normally provide for categories of development in the green belt that are not supported by national guidance, unless there are very, very compelling reasons to do so. These do not exist here and, accordingly, I support the council's exclusion of this area from the current local plan.

Recommendation

29.3  I recommend that no modification be made to the local plan.

30.  Policy E03 - Land North of Sundayshill Lane, Falfield

Objection

24/003  Mr Sprackman  E03

Issue

Should the settlement boundary of Falfield be adjusted to accommodate additional development?

Reasoning and conclusions

30.1  The objector is proposing a substantial expansion to the village to accommodate a mixed scheme including housing, employment, communal and recreational facilities. Falfield is a small village on the A38 with a very limited range of facilities. It has no primary school. The development suggested would serve to refocus the village away from the main road and could provide a range of services and facilities for the local population.

30.2  In the housing chapter I have concluded that there is a substantial shortfall of housing land and that further sites must be identified. However, I do not consider that this justifies the provision of more housing in this village. I am satisfied that suitable sites can be found in much more sustainable locations than this. Even with the range of uses proposed, for most of their day to day needs and employment residents would have to travel to other villages and towns, particularly to Thornbury, most of which journeys would be by car. Likewise, I am satisfied that the plan makes suitable provision for the employment needs of its residents. There is no need to provide for further employment. Any employment here, whilst available to local residents is likely to generate car borne commuting. PPS7 is supportive of rural housing that sustains the health of the rural economy and the viability of village communities. That however, does not justify proposals for significant levels of development in such small villages with such a weak level of facilities. That would be to promote unsustainable patterns of development.

30.3  Whilst I appreciate the benefits such a mixed use scheme could bring to the local community I am strongly of the view that a small village with very limited local facilities, such as this, should not be a focus for significant levels of development. There are many much more
sustainable locations where development should be concentrated in the interest of reducing dependence on the motor car. To provide for development on the scale envisaged here would be contrary to national, regional and strategic guidance and would be in conflict with the local plan strategy.

**Recommendation**

30.4 I recommend that no modification be made to the local plan.

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### 31. Policy E03 - Combination Ground, Filton

**Objections**

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**Issue**

How should the status of the site be recognised in the plan?

**Reasoning and conclusions**

31.1 Planning permission has recently been issued for employment development of this site. Until development actually takes place it would not be appropriate to include it within the list of safeguarded sites under policy E3. However, it would be reasonable to list the land under Appendix 11 in terms of its likely contribution to the employment land supply: it could be listed under the heading of "Land with planning permission". When the local plan is prepared for adoption Appendix 11 should acknowledge this site in the most suitable form reflecting the current position at the time.

**Recommendation**

31.2 I recommend that the local plan be modified by the updating of Appendix 11 to reflect the latest position.

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### 32. Policy E03 - Hollies Farm and Southwood Farm, Rangeworthy

**Objection**

258/003 Hannick Homes & Developments Ltd E03

**Issue**

Should the settlement boundary be adjusted so as to accommodate a mixed use development?

**Reasoning and conclusions**

32.1 The objector is proposing a substantial addition to the village to accommodate a mixed scheme including housing and employment. Rangeworthy is a small village just beyond the green belt, to the north of Yate. It has a very limited range of facilities. The development suggested would include within the village the site of two farms and associated agricultural land.
32.2 In the housing chapter I have concluded that there is a substantial shortfall of housing land and that further sites must be identified. However, I do not consider that this justifies the provision of more housing in this village. I am satisfied that suitable sites can be found in much more sustainable locations than this. Even with a range of uses, for most of their day to day needs and employment residents would have to travel to other villages and towns, particularly to Yate/Chipping Sodbury, most of which journeys would be by car. Likewise, I am satisfied that the plan makes suitable provision for the employment needs of its residents. There is no need to provide for further employment. Any employment here, whilst available to local residents is likely to generate car borne commuting. PPS7 is supportive of rural housing that sustains the health of the rural economy and the viability of village communities. That however, does not justify proposals for significant levels of development in such small villages with such a weak level of facilities. That would be to promote unsustainable patterns of development.

32.3 Whilst I appreciate the benefits a mixed use scheme could bring to the local community I am strongly of the view that a small village with very limited local facilities, such as this, should not be a focus for significant levels of development. There are many much more sustainable locations where development should be concentrated in the interest of reducing dependence on the motor car. To provide for development on the scale envisaged here would be contrary to national, regional and strategic guidance and would be in conflict with the local plan strategy.

Recommendation

32.4 I recommend that no modification be made to the local plan.

33. Policy E03 – Hanham Road (32)

Objection

430/506 Cala Homes (South) Ltd. E03

Issue

Does the reduction in the Hanham Road safeguarded area undermine the rationale behind policy E3?

Reasoning and conclusions

33.1 In the revised deposit draft the council has reduced the area of the safeguarded area by 1.3 hectares and allocated this for housing. The office block and industrial units are retained within the safeguarded area. I am supportive of policy E3 and the safeguarding of employment areas. These areas help to provide a spread of employment opportunities across the district and so provide the opportunity for residents to work locally. However, the council has been pressed to identify sufficient housing land and has chosen to allocate an underused car park, part of the formerly protected employment area at Hanham. This seems to me to be a reasonable compromise. It does not lose productive employment land and at the same time makes available a site that is suited to a high-density development. I do not think that this change undermines the rationale behind policy E3.

Recommendation

33.2 I recommend that no modification be made to the local plan.
34. Policy E04 – Filton Airfield safeguarding

Objections

22/002 Campaign Against Filton Commercial Airport (CAFCA) E04
49/009 Crest Nicholson Properties Ltd and ICP Properties Ltd E04
430/016 Cala Homes (South) Ltd E04
438/014 Mr L Smith E04

Support

203/012 Frampton Cotterell Parish Council E04
267/033 Arlington Property Developments Ltd E04

Issues

Is there a conflict between this policy and those policies providing for development in the area?

Is the plan clear as to what will happen if BAe no longer needs all the site?

Reasoning and conclusions

34.1 The policy aims to ensure that the authorised operations at Filton Airfield will not be prejudiced by other developments in the area. This is quite clear in its meaning. Where the judgement is that certain proposals will prejudice the operations, then this policy provides the basis for a refusal of permission. Policies such as policy EP4 will assist in this judgement. The adjoining Northfield allocation will be designed in such a way as to avoid unacceptable conflict between that proposal and the working airfield. I see no reason why other developments, such as housing allocation H1(A) 2, Filton A38, cannot be designed to avoid prejudice.

34.2 The airfield is included within an employment safeguarding area, under policy E3. Thus, if any further areas become available policy E3 will guide the decisions as to the future use.

Recommendation

34.3 I recommend that no modification be made to the local plan.

35. Policy E05 and Paragraph 7.60 – Employment development in the countryside

Objections

52/004 The Tortworth Estate Company E05
302/002 Charfield Parish Council E05
316/001 National Farmers Union E05
316/503 National Farmers Union E05 7.60
441/021 Redrow Homes (South West) Ltd E05

Support

198/012 Marshfield Parish Council E05
288/005 Department for Environment, Food & Rural Affairs E05
302/501 Charfield Parish Council E05
410/523 Environment Agency E05

Issues

How should agricultural buildings be treated in this policy?
Reasoning and conclusions

35.1 The Tortworth Estate is seeking specific reference to agricultural buildings within the scope of this policy. This would give, in its view, an equality of treatment between Class B employment and former agricultural buildings. The objector is concerned that agricultural units should be treated in the same way as rural employment sites. The council, at the inquiry, indicated that it is not seeking to treat these two types of use differently. Thus, agricultural buildings would fall within the scope of policy E5, relating to new employment generally in the rural areas. It allows for the conversion or re-use of existing rural buildings, which covers agricultural buildings. This is then covered in more detail in the subsequent policy, policy E6. The objector is concerned that the policy should allow for intensification of rural employment on existing agricultural units. That is allowed for by policy E5 criterion B. In my view, the more appropriate place for a reference to intensification of use associated with rural buildings is in policy E6, relating to conversion and re-use. The council indicated that it was acceptable for an addition to criterion C of policy E6 to refer to intensification. I recommend accordingly.

35.2 The council has made changes that bring in references to farm diversification into policy E7. That broadly meets the concerns of the NFU. However, it does leave the question of whether the policy itself should cross reference to the other policies as exceptions to the restrictive approach or whether the supporting text is an acceptable place for this. Whilst the plan should always be read as a whole, there is some potential for confusion in respect of these related policies dealing with development within the countryside. Accordingly, for the sake of clarity I favour the inclusion of the exceptions allowed for by other policies to be listed as part of this policy.

35.3 Policy E5 aims to avoid new employment sites being developed on greenfield sites outside settlement boundaries. Elsewhere, it allows for some rural development based upon existing buildings and uses. I consider that this is a reasonable approach, that serves to concentrate development within settlements, the most sustainable option, and in turn to protect the countryside for its own sake. Policies should not allow for unplanned incremental spread of employment sites outside clearly defined settlement boundaries. Where there is a need to provide for employment development on peripheral, sustainable sites, then this should be done in an explicit way, through specific allocations, justified by the plan’s strategy and the particular circumstances.

35.4 Charfield Mill lies outside the defined village of Charfield. It comprises two former, listed water mills with a number of more recent buildings, together with some residential properties. Various commercial activities take place here, including engineering, storage and offices. The site is set in rural surrounds, reached by a narrow country lane and is subject to flooding. Because of concerns about residential amenity, the highway access and flooding in particular, the parish council is seeking a specific policy in the plan to provide a clear, reliable and consistent approach to dealing with planning applications. It points to the difficulty of controlling uses and activities on the site and the problems of inconsistency and coping with incremental change.

35.5 I can understand why the parish council is seeking such a policy. However, I do not consider that it is realistic for this local plan to include detailed, site specific policies for individual sites such as this. This site is not unique. There are many other rural employment sites across the district. The council simply would not have the manpower to prepare such detailed policies. The function of the local plan, amongst others, is to set out in a
comprehensive way the criteria that will provide the basis for decisions to be made on any planning applications coming forward. The local plan does just that.

35.6 I accept that the application of criteria and judgements to be made on them may lead to some inconsistencies and lack of clarity. However, I do not consider that the problems of this site are so severe or unique as to justify the local plan adopting a site specific approach here. There is scope outside of the local plan to prepare non-statutory guidance. In view of the obvious manpower constraints of the district council it may well be that the parish council could provide the impetus and wherewithal to provide a detailed planning framework within which any proposals could be judged.

Recommendation

35.7 I recommend that the local plan be modified

i) by the addition of criterion C to policy E5: "Development permitted by policies E3 and E6 to E10."

ii) by the rewording of criterion C of policy E6 to read "Development, including any alterations, intensification or extensions, would not....."

36. Policy E06 and Paragraphs 7.62-7.66A

Objections

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Issues

Does the policy create the potential for the dispersal of activity?

Does the policy reflect PPG7 guidance?

Does the policy deal appropriately with all forms of rural buildings?

Reasoning and conclusions

36.1 The potential for conversions in the district is not such, in my view, as to materially affect the spread of development across the district. There is no danger of the council’s locational strategy being blown off course by the inclusion of this policy which allows for rural buildings to be re-used.

36.2 Proposed change 63 reinstates paragraph 7.63 and adds an indication that planning agreements will be considered, rather that sought as a matter of course. Likewise the
reference to the withdrawal of permitted development rights is one of considering such action. Both these reflect national guidance. They do not weaken the approach, but properly set out that such action will be considered. It would be wrong to adopt a more dogmatic approach than this, unless the text was able to spell out clearly the circumstances when the action would be taken. I agree with the council that it would be difficult to do this. I am, therefore, content with the qualification of "considering". The policy is not negative and should not stand in the way of rural diversification.

36.3 The policy and text do not preclude the re-use of modern buildings. They set out the criteria to be met when any buildings are converted or re-used. They should not unacceptably hinder the re-use of modern buildings.

36.4 Paragraph 7.66A cross references this section to the tests in policy E5. Though not essential, I consider that it would be helpful to retain this as a useful guide.

Recommendation

36.5 I recommend that the local plan be modified in accordance with PC63.

37. Policy E07 and Paragraphs 7.67-7.70A – Farm diversification

Objections

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Issues

Should the policy include a broader list of alternative uses?

Does the plan unreasonably restrict food processing and packaging?

Should the plan contain a specific policy for garden centres?

Is paragraph 7.70A needed?

Reasoning and conclusions

37.1 The revised deposit version of the plan has redrawn this policy to give a generally supportive approach to farm diversification. That is to be welcomed. The policy lists a number of possible forms that this could take. This appears to have been taken from the guidance in Annex C of PPG7. I have no objection to this list, provided it is read as being just that; a list of examples and that it is not an all-inclusive list. Paragraph 7.66B helpfully includes a cross-reference back to the PPG7 guidance. This will have to be up-dated to reflect the publication of
PPS7. The list in the policy is not a complete one and it would be very difficult to draw a list that was. Any proposal for an agricultural market could fall within the scope of this policy, subject to the matter of scale, but might be better considered under other relevant policies in the plan.

37.2 Criterion A of policy E7 limits the processing and packaging of outside produce to small scale. PPS7 is supportive of non-agricultural activities, though these should not result in excessive expansion and encroachment into the countryside. The council does not otherwise explain why such activities should be limited to small scale. It seems to me that provided such uses met the requirements of the other criteria of the policy, which cover such matters as traffic, access, servicing, scale, amenity and environment, then there is no need or justification to specifically limit the activity to small scale. On that basis and as food processing and packaging are mentioned in the main body of the policy criterion A serves no useful purpose and I recommend its deletion. As this is part of the wider issue of farm diversification I do not consider it appropriate or necessary to separate out this activity and place it in its own policy.

37.3 The council has included a cross reference, under policy E5 to the effect that proposals for garden centres or their extensions will also be considered against policies in the retailing chapter. I comment further on this point in item 2 of chapter 9 of my report. For the reasons I give there I do not support the inclusion of a policy specific to garden centres.

37.4 I am content that paragraph 7.70A should remain in the plan. It draws attention to a possible form of diversification. Policy EP5 supports the provision of renewable energy installations.

Recommendation

37.5 I recommend that the local plan be modified by the deletion of criterion A.

38. Policy E08 and Paragraph 7.73 – Agricultural development

Objection

302/504 Charfield Parish Council E08 7.73

Support

288/027 Department for Environment, Food & Rural Affairs E08
316/512 National Farmers Union E08 7.73

Issue

Should replacement buildings be allowed where other suitable buildings have been allowed an alternative use?

Reasoning and conclusions

38.1 In response to this objection the council proposes, via PC64, to reintroduce, with some wording changes, paragraph 7.73 that was omitted from the revised deposit version of the plan. The council gives no justification for adding this wording. PPG7 raised concerns about potential abuse of the planning controls in respect of buildings erected under permitted development rights then becoming available for other uses. The new wording is aimed at a slightly different position, that of where new buildings are sought after suitable buildings have been allowed to move to another use. The wording in the text helps to explain criterion A which sets the test of there being no existing suitable underused building available. However, it seems to me that it goes a little too far in its negative approach.
38.2 Farm diversification and other policies seek to help to create a flexible and supportive approach to the agricultural economy. I am not persuaded that farmers should have to show exceptional circumstances to justify new agricultural buildings even in the case where buildings suitable have been granted permission for other uses. The acceptability of those other activities would have been judged when granting permission. The acceptability of the current proposals can also be judged on their merits against the tests in this policy. Unacceptable additions to farms and the spread of sporadic development can be curtailed through the operation of this policy. It is a different proposition from the situation where the use of permitted development rights can result in unneeded buildings becoming available for other uses. In my view the wording proposed imposes a too stringent test and undermines the flexibility necessary to work towards a viable and productive agricultural base. I do not, therefore, support the change advanced by PC64.

Recommendation

38.3 I recommend that no modification be made to the local plan.

39. Policy E09 – Horse related development

Objection

188/009 Nigel Cant Planning E09

Support

288/026 Department for Environment, Food & Rural Affairs E09

Issue

Should the policy allow for on-site dwellings?

Reasoning and conclusions

39.1 The council indicates that applications for housing and horse related development would be considered against policies H3 – residential development in the countryside, H8(A) – agricultural/forestry workers dwellings in the countryside and this policy. As this policy relates to horse related employment proposals, the housing policies seem the more appropriate ones. The council goes on to indicate that although dwellings related to equestrian use are not specifically covered in policy H8(A) the criteria in that policy would be applied to such a development proposal. Whilst I accept that it is not possible to include a policy for each and every type of development, if it is the council's intention to apply those criteria to this form of proposal then the plan, for the sake of clarity of guidance, might just as well say so.

Recommendation

39.2 I recommend that the local plan be modified by the addition, to the supporting text, of a note that proposals for horse related dwellings will be considered against policies H3, E9 and especially H8(A).

40. Policy E10 and Paragraphs 7.85-7.88- Tourism

Objections

23/001 Mr A Ripley E10
283/047 Government Office for the South West E10
283/048 Government Office for the South West E10 7.85-7.88
431/044 Friends of the Earth E10

Support

410/021 Environment Agency E10

Issues

Should tourism be encouraged?

Should hotels be considered as a special case for support?

Is the plan unduly restrictive to camping and touring caravan sites?

Does the text contain policy that should be set out in the policy itself?

Reasoning and conclusions

40.1 This is a positive supportive policy. It reflects national guidance and I hold no truck with the FoE suggestion that tourism is in some way undesirable. It may not be the most sustainable form of activity but it is one that many people enjoy. The aim is to ensure that tourism is as sustainable as possible. It is unrealistic to try and discourage tourism, an approach contrary to national guidance.

40.2 The objection from Mr Ripley is centred on the Cribbs Lodge Hotel. That site is in the green belt and it would not be appropriate to adopt a policy for expansion of such premises outside of the categories of appropriate development set out in paragraph 3.4 of PPG2. I see no need for a specific policy in respect of hotels. Any proposals coming forward can be judged against a range of policies in the plan, in the light of the overall strategy to concentrate development in the main urban areas and protect the countryside from unnecessary development.

40.3 I do not consider the plan is unduly restrictive to camping and touring caravans. The revised deposit is permissive of development where it meets a demand for short stays that cannot be catered for on existing sites.

40.4 Finally, I agree that the paragraphs 7.85 to 7.88 contain matters against which proposals will be judged. They are not simply an explanation of the policy itself, but, rather, set out more detailed policies that should be contained within the policy. This is the case with the second sentence of paragraph 7.85, the whole of paragraph 7.86, the first sentence of paragraph 7.87 and paragraph 7.88. I invite the council to revisit these paragraphs and to include policy within the policy itself.

Recommendation

40.5 I recommend that the local plan be modified by those elements of policy that are contained within the supporting text at paragraphs 7.85 to 7.88 be deleted and incorporated within an expanded policy E10.
CHAPTER 8: HOUSING

1. Paragraphs 8.2-8.7 – Aim, Structure Plan and Objectives

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Issues

Should the aim in paragraph 8.2 differ from that expressed in the strategy chapter?

Would building housing on employment land lead to employment development on greenfield sites?

Should objective 1 be expressed in wider terms?

Should objective 2 refer to all urban areas?

Many objections, listed under the subsequent item, relate to the description of the sequential approach in paragraph 8.4 and to objective 2. I consider these objections in the section of my report below dealing with paragraphs 8.31 to 8.41. Following my conclusions there, paragraph 8.4 and objective 2 will require redrafting.

Reasoning and Conclusions

1.1 The council proposes a change, PC162, to bring the aim in line with that in the strategy chapter. I recommend accordingly.

1.2 I comment in more detail in item 6 of chapter 2 of my report on the use of former housing allocation sites for employment. The plan proposes no new employment allocations on greenfield land so the fears of the objector are unfounded on this point.

1.3 Objective 1 refers to identifying sufficient land to achieve conformity with the dwelling allocation in the JRSP. Bearing in mind my conclusions in respect of the housing land supply requirement and the need to have regard to the RPG requirement, this section will need rewording. Locations are referred to in objective 2 and types of housing in objective 3. There is no need to mention them in objective 1. I recommend some replacement wording.

1.4 As regards objective 2, I am content that the reference to the urban area properly reflects the locational guidance in the JRSP.

1.5 The objection from Hartwell plc regarding making more efficient use of land has been met by the revised deposit plan.
### Recommendation

1.6 I recommend that the local plan be modified

i) in accordance with PC162, and

ii) by the deletion of objective 1 and its replacement by: "To meet the housing needs of South Gloucestershire, through the provision of sufficient land to meet the aspirations of RPG10."

### 2. Paragraphs 8.8 - 3.30A (including Figs 8.1 & 8.2) Overall Provision of Housing

#### Objections

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409/502 North East Thornbury Consortium H01(OP) 8.29
409/503 North East Thornbury Consortium H01(OP) 8.30A
409/504 North East Thornbury Consortium H01(OP) Fig 8.2
417/001 Wimpey Homes Holdings Ltd H01(OP) 8.13-8.30
417/002 Wimpey Homes Holdings Ltd H01(OP)
417/007 Wimpey Homes Holdings Ltd H01(OP)8.29-8.30
417/010 Wimpey Homes Holdings Ltd H01(OP)
420/003 Bryant Homes Technical Services H01(OP) Fig 8.2
420/004 Bryant Homes Technical Services H01(OP) 8.3-8.5
420/005 Bryant Homes Technical Services H01(OP) 8.13-8.30
420/006 Bryant Homes Technical Services H01(OP)
420/007 Bryant Homes Technical Services H01(OP)
423/501 N G Associates H01(OP)8.20, 8.21, 8.28
423/503 N G Associates H01(OP)
423/502 N G Associates H01(OP) 8.28A-8.28C
423/504 N G Associates H01(OP)
429/001 David Wilson Estates H01(OP) Fig. 8.2
429/002 David Wilson Estates H01(OP) 8.4
429/004 David Wilson Estates H01(OP)
429/501 David Wilson Estates H01(OP)
The Council has grouped a large number of objections under this heading. I shall deal with the main issues of housing land supply first and then consider those objections still remaining which address the detailed wording of the individual paragraphs through to paragraph 8.30A and Figure 8.2. Many of the detailed points of objection relating to this section of the plan have been overtaken by events and/or are accommodated in the Revised Draft Plan.

**Issues**

How much housing should the Plan make provision for?

How large is the residual requirement?

**Reasoning and Conclusions**

**The housing requirement**

2.1 The First Deposit Draft Plan was placed on deposit in the autumn of 2000. It identified a requirement of 15,200 dwellings for the District, based upon the JRSP as proposed to be adopted by the Joint Committee. The EiP Panel had earlier recommended that the district requirement be increased to 21,200 (54,300 County-wide). In July 2000 the Secretary of State issued a Direction to the Joint Committee to increase the County-wide housing requirement by 10,700 dwellings to achieve the Panel’s recommendations. Although this did not specify the district apportionment of this increase, the EiP Panel recommendation indicated...
their view that the district could absorb a considerable proportion of this increase. Subsequently, the Direction was withdrawn and the JRSP adopted, providing for an increase County-wide of 6,600 dwellings with the district’s contribution raised by 900 to 16,100 dwellings.

2.2 The Revised Deposit Draft Plan adopts this JRSP requirement of 16,100 dwellings to be provided from 1996 to 2011. This equates to a yearly rate of 1,073 dwellings. Normally it would be expected that this figure would provide the requirement over the plan period. Nevertheless, I consider that there are factors here that weigh quite heavily towards adopting a rate higher than that provided for by the JRSP.

2.3 The guidance in RPG10, issued in September 2001, identifies a requirement for Avon as a whole of 3,700 dwellings per year for the 20 years 1996 to 2016, a total of 74,000 dwellings. The equivalent Avon rate provided for in the JRSP is 50,200 over the 15 year time span, that is 3,347 dwellings per year in the former County. Thus, RPG is identifying a rate for the County, for the period from 1996 through the plan period and on to 2016, of just over 10% higher than the JRSP figure. It was argued by the council at the Inquiry that the RPG figures shouldn’t be translated pro-rata into a figure for South Gloucestershire district, that being the function of the Structure Plan. It felt that the requirement to 2016 for the district, based on RPG10, could be quite different and that this should be left for decision by others, outside of this local plan process.

2.4 Whilst I accept that the apportionment is a matter for others, I do not believe that this should mean that this local plan should have no regard to the context provided by the RPG. Although the RPG was issued a year before the adoption of the JRSP, this is, in essence, a technicality. It is clear from the evidence that the RPG post-dates the preparation of the JRSP. It was only the delay caused by the Secretary of State’s Direction in respect of housing requirements that prevented the adoption of the JRSP before the issue of the RPG. Although the requirement figures were in dispute, the policy framework and strategy was not. The JRSP was prepared and was otherwise ready for adoption well before the RPG was issued. The final stages, at least, of the RPG were undertaken post the effective production of the JRSP. On this basis I accept the view that the RPG is the more up-to-date guidance, best reflects the most recent national policy guidance and should, in the spirit of national guidance and the law be given due prominence. This view is reinforced by the move away from the laboured and discredited 3 stage cascading of guidance towards a more pragmatic and flexible process.

2.5 The Housing Minister, in his statement of 17 July 2003, seeks to remove barriers to the provision of sufficient new homes in the right place at the right time. The 2003 Budget and the Barker Report have given further impetus to the over-riding objective to deliver the required housing provision. The managed release of housing should secure the timely delivery of the agreed housing numbers set out in up-to-date regional planning guidance. The emphasis is upon breaking down barriers to ensure that new housing is provided. Traditionally, this RPG requirement would be cascaded down through the structure plan, which would apportion it to individual districts, on to local plans to identify the individual allocations necessary to meet that apportionment.

2.6 However, there are significant difficulties with pursuing that course here. The development plan process is being revised. It is not yet entirely clear as to the form and timing of the process to apportion the RPG 10 requirement for Avon. I understand that work is already well under way in preparation for a replacement strategic plan and that that work could feed into a Regional Spatial Strategy or Sub Regional Study. However, it will take some time before it will be possible for the new system of development plans to set a new requirement for the district and, in turn, the district to identify suitable sites. A significant part of the remaining period of this local plan would have passed. In my view it would be wrong to sit back and wait for those processes to take their course. The decision should be made now to work towards what is likely to be the new requirement.
2.7 If provision in this local plan is based on the JRSP, the development rates are going to increasingly fall behind the RPG rate. Any subsequent review of the local plan, through the LDF process, would have to very substantially increase building rates if the higher rate of building envisaged by the RPG for the overall twenty year period of 1996 to 2016 is to be achieved. In Avon, building at the JRSP annual rate of 3,347 dwellings would mean that the rate post 2011 would have to rise by over 40% to a rate of 4,760 if the RPG's requirements were to be met overall. (By comparison, pro rata, the district's rates would have to increase from 1,073 to 1523 per year). Paragraph 6.8 of PPG12 indicates that the duration of a local plan should be for a period of 10 years from the plan's forecast adoption date, a point reinforced by the Housing Minister's statement. If this plan is adopted in the autumn of 2005, as the council hopes, it would have only a 5½ year life. There would have been undoubted logic in this local plan extending to 2016, giving it a 10 year time horizon from adoption. However, that is not a realistic proposition, not least with an early replacement plan likely through the introduction of the new LDF process. In this context it is both reasonable and sensible for this plan to look to achieving a steady rate over the remaining years of this local plan, at a rate that reflects the longer term context as set out in the approved RPG, rather than expecting rates to sharply increase in the immediate post-plan period.

2.8 I accept the council's view that the RPG figure should not simply be apportioned between districts on the same basis as in the past. However, I believe that there are strong pointers to South Gloucestershire district continuing to provide a substantial element of the Avon requirement. Two of the four districts are constrained in their housing potential: Banes for environmental reasons and Bristol for the reason that it is already very substantially built-up. I note that Bristol has achieved a substantial level of brownfield development, but have doubts that this could be sustained over a longer period at any scale significantly above current expectations. As a result, it is likely that South Gloucestershire, with North Somerset, will be expected to continue to provide a substantial proportion of the RPG Avon requirement. My reading of the RPG strategic guidance confirms the view that South Gloucestershire is envisaged to continue to provide a focus for new development. For these reasons I do not consider that it would be amiss to assume, for the purposes of planning housing provision for what is left of this local plan period, that the district should be expected to accommodate pro-rata a similar proportion of the County's requirements as provided for in the JRSP.

2.9 At present the district is expected to accommodate about 32% of the Avon total, based on the JRSP. Applying the same percentage contribution rate to the RPG figure for the former Avon area of 3,700pa, gives an annual requirement of 1,184, and a local plan total of 17,760 for the years 1996 to 2011. This is approximately 10% over the JRSP requirement for the district. Although fairly substantial, I do not consider that this brings it out of conformity with the guidance in the JRSP. The annual rate of 1,184 compares with previous rates achieved of 1,427 in the 10 years 1991 to 2001. It reflects a little more closely the EiP Panel's view on the level of housing requirements (21,200) and indeed the Secretary of State's position when he issued his Direction, seeking an Avon-wide increase of 10,700 dwellings. Though no great weight can be given to the Panel's views, nor to the reasons for the Secretary of State's Direction, following the adoption of the JRSP, they and the recent history of housing land supply suggest that increasing the level of requirement beyond the adopted JRSP would not be out of place. It can be said that this higher rate provides for a steadier flow in the supply of housing land. The adopted JRSP implied a significant drop in building rates that does not sit comfortably with recent past rates and with current assessments of the sub-regional housing requirements.

2.10 Moreover, Policy HO1 of RPG10 expressly states that "these rates of provision (ie those set out in the policy) should apply to the period up to 2006. Where development plans are reviewed and the new plan extends beyond 2006 they should continue to provide for additional dwellings at the annual average rates above (ie in the policy) until such time as any different rate is adopted following review of this guidance".
2.11 The plan needs to be robust in its delivery of the housing required. If the houses are to be provided to meet the latest estimates of need, then the plan cannot sit back and passively await the next round of strategic guidance. For all these reasons I consider that it would be appropriate for the local plan to reflect the more up-to-date guidance in RPG10. Thus I set the requirement for the district at 17,760. In this way the overall housing land requirement included in this plan would better reflect the PPG12 guidance that the plan should look forward 10 years from the date of its adoption. Allocations would be based on the period through to 2011, with time to manage and adjust these, in the last years of this plan period and beyond, through the new LDF process. If in time it proves that it was inappropriate to adopt a pro-rata RPG approach, then the rate of supply of land could be adjusted, in the latter years of this plan and beyond, to reflect those new circumstances.

2.12 I fully recognise that there are significant infrastructure constraints in the district, in particular highway capacity and paucity of public transport. I recognise too the various environmental constraints to development across many parts of the district. Nevertheless, the increased requirements represent about a 10% increase and, as my conclusions elsewhere show, I am satisfied that this level of development can be accommodated in a sustainable manner without incurring unacceptable difficulties.

The residual requirement

2.13 To the end of March 2003 8,760 dwellings had been completed, a rate of 1,251 dwellings per annum. This leaves a remaining requirement for the years 2003 to 2011 of exactly 9,000 dwellings, an annual requirement of 1,125 dwellings.

Commitments

2.14 The council has identified a commitment of 1,388 dwellings, net of demolitions, on sites with planning permission. To avoid double counting windfalls on previously developed sites have been deducted from that total to give a net contribution from sites with extant permissions of 1,094. The council has not applied a non-implementation allowance as it considers that, post PPG3, there is ample opportunity to manage the supply to make up for any shortfall in these sites coming forward to completion.

2.15 The plan's approach of a Reserve Site would assist in the process of Plan, Monitor and Manage. If there is a shortfall the plan must make provision for bringing the supply up to the required level. However that may be, I do not consider that it justifies preparing the housing land figures on an unrealistic basis. In my view, the figures produced should be as realistic as possible. I consider that it is creating an unreasonable scenario to project figures that are unlikely to happen. It is usual practice to apply a 10% non-implementation allowance to those schemes which have planning permission. I see no convincing reason why such an allowance should not be applied here, to allow for that proportion of permitted schemes that, for whatever reason, would not be built.

2.16 A proportion of the 1,094 dwellings identified in this category were under construction as at April 2003. It is safe to assume that those dwellings actually started will be completed. Any discounting should exclude these figures. The figures given by the council do not indicate how many of these 1,094 dwellings fall into that category, but applying the ratio given for the original, non-adjusted figures, about 370 of these are likely to fall into that category. Accordingly, a total of 74 dwellings should be discounted from these commitments, giving a revised figure of a net contribution from sites with planning permission of 1,020 dwellings.

2.17 The council also identifies some 176 dwellings to be provided as a net contribution from those sites, excluding windfalls, where there has been a resolution to grant planning permission. As above, this is a category where some non-implementation allowance should be made, especially so as these sites may still be the subject of as yet unresolved negotiations. A
10% non-implementation allowance would be reasonable here, reducing the contribution from this source to a figure of 159 dwellings.

**Windfalls**

2.18 The council has estimated that windfalls should provide an average of 230 dwellings per year for the rest of the plan period. This excludes, as per PPG 3 advice, those coming forward on greenfield sites. The council figures also show that such provision is on the decline. The 230 figure represents the rate actually achieved in the five years to 1996. For the 10 years prior to 1996 the annual rate is much higher, suggesting a downward trend. However, the council is of the view that increased densities resulting from making the most efficient use of sites, as strongly advocated by national guidance, and the similar emphasis on brownfield development means that the rate of provision from this source will not decline further during the plan period. I am content to accept this view. It is supported by recent figures that show for 3 of the last 4 years that the supply from this source has in fact exceeded the council’s estimate.

2.19 The results of the Urban Capacity Study do not particularly assist here. A well conceived and thorough UCS should mean that the level of unexpected, windfall, sites is reduced as sites are picked up for allocation. That has not happened here, albeit the UCS does provide a means of examining the likely future potential for windfalls. The council’s UCS work came under some criticism in respect of a lack of transparency and uncertainty over assumptions made and the deliverability of sites. The information presented in this respect does not always have the clarity it might and some attempts were made to forensically examine the detail. On the face of it there does not appear to be any visible link between that study and the windfall rates adopted in the local plan. I do not wish to be drawn into that debate. Taking a wider view, and being mindful of the potential pitfalls, on the evidence available to me it seems to me that it should not be used to justify a lower level of future windfalls.

2.20 The UCS did not lead to the identification of a raft of new allocations, which might imply a reduction, in the short term at least, of windfall sites coming forward. It identified a potential for new windfalls which, with the addition of an assumed 60 dwellings per year from within the 33 defined rural settlements not covered by the UCS, is approximately in line with recent trends. In short, the council came to the opinion that the UCS did not come forward with any reason to adjust its estimate of 230 dwellings from windfalls. Though I am sceptical as to the usefulness of the UCS in helping to estimate future windfalls, I have no clear reason before me as to why I should think that the level of windfalls would fall materially below the figures advanced by the council.

2.21 I accept that windfall sites will continue at the rate of about 120 per year, and that small sites, outside the scope of the UCS, should provide in the region of 70 dwellings per year. The rural settlements range from small villages to quite large settlements and I see no difficulty with the assumption made by the council that an average of 2 dwellings per settlement, per year, would come forward from this source. I also do not consider the Council’s figure of 40 units per year from conversions is unduly optimistic. It is a little above the rate achieved in recent years, but with efforts to make better use of existing stock I do not regard this figure as unreasonable. I am, therefore, content to accept the level the council proposes, together with its breakdown between large sites, small sites and conversions. I do not see this issue as crucial. If I am significantly wrong over the future level of housing from windfalls, then the proper management of the housing land supply over subsequent years, through the preparation and adoption of a new LDF, should be able to accommodate any shortfall from this source.
The residual requirement

2.22 On the basis of the above considerations the residual land supply requirement is as follows:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>17,760</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provision</td>
<td></td>
</tr>
<tr>
<td>Completions to March 2003</td>
<td>8760</td>
</tr>
<tr>
<td>Capacity on sites with planning permission</td>
<td>1020</td>
</tr>
<tr>
<td>Capacity on other committed sites</td>
<td>159</td>
</tr>
<tr>
<td>Contribution from windfall sites</td>
<td>1840</td>
</tr>
<tr>
<td>Total</td>
<td>11,779</td>
</tr>
</tbody>
</table>

Remaining requirement to be met from allocations  5,981

2.23 The difference between my figure for the requirement compared with the council’s figure of 4,230 given in Topic Paper 10 is made up almost entirely from my view that the plan needs to react positively to the RPG10 guidance and to national guidance which is stressing the need for the planning system to be positive and to ensure the delivery of housing that is needed. I do not consider that it would be appropriate to apply a non-implementation allowance on the allocations required, to allow for slippage. Any problems in the rate of supply should be picked up by monitoring of the supply and suitable other sites brought forward if necessary through the LDF process.

2.24 The local plan does not contain a landmark policy to the effect that it will provide sufficient land to meet the housing requirements. I suggest that this be introduced as a lead in to policy H1(A). Following on from my conclusions above it will be necessary to fundamentally redraft large sections of the text from paragraph 8.13 through to Figure 8.2. Figure 8.2 would sit more happily after the new policy establishing the commitment to meet the housing requirement identified.

My conclusions above cover nearly all the points raised in the objections listed under this item. Others have been met by changes incorporated into the Revised Deposit version of the plan. I comment below, as necessary, where those objections have a specific bearing on the text of the plan.

The general housing context – paragraphs 8.8 to 8.10

2.25 Those objections that make reference to these paragraphs raise no matters which might require changes to the text, other than any figures should be updated as and when more up-to-date figures become available.

Recent housebuilding activity – paragraphs 8.11 and 8.12 and Fig 8.1

2.26 Those objections that make reference to these paragraphs raise no matters which might require changes to the text, other than any figures should be updated as and when more up-to-date figures become available.

The strategic requirement for land for housebuilding – paragraphs 8.13 to 8.30A and Fig 8.2

i) paragraph 8.13
2.27 In view of my conclusions above, this paragraph will require complete redrafting to establish and explain the adoption of a housing land requirement based upon the RPG rather than upon the JRSP. I see no advantage in re-instating the deleted paragraphs 8.14 to 8.16.

ii) Existing completions – paragraph 8.17

2.28 This section will need to be updated to include the latest figures.

iii) Completions on sites already committed at April 2001 – paragraph 8.18

2.29 This section will need to be updated to include the latest figures and to reflect my conclusions that some allowance should be made for non-implementation. I am content that these sites be listed in Appendices 13 and 14. I do not consider that it would be appropriate to show these sites on the Proposals Maps.

iv) The availability of empty or under used buildings/conversions – paragraphs 8.19 to 8.21

2.30 The revised deposit version of the plan clarifies matters as far as empty homes are concerned. In the section above I have supported the council's estimates for the number of units coming forward through conversions. This, however, is a matter that will need to be carefully monitored so that further sites can be brought forward if the council's estimates prove to be overoptimistic.

v) Making more efficient use of land – paragraphs 8.22 and 8.23

2.31 Policy H2, criterion C, as recommended in my report, sets out density requirements for new housing sites. Those densities are reflected in my conclusions on the specific allocation sites considered below. I see no compelling need to alter the wording of the first point of paragraph 8.22.

vi) Brownfield windfall sites/small infill sites – paragraphs 8.25 to 8.28

2.32 I acknowledge that the plan continues to rely on a substantial proportion of windfall sites. This reflects, in part, the likely continuing supply from small sites, but also the fact that the UCS did not identify and bring forward many of the larger windfall sites that are likely to be developed in the period to 2011. I have broadly supported the council's position with respect to these sources of housing supply. As with conversions, it will necessary to carefully monitor the provision from this source so that further sites can be brought forward if the council's estimates prove to be overoptimistic.

vii) South Gloucestershire Urban Capacity Study (2001) – paragraphs 8.28A to 8.28C

2.33 I have commented earlier in this section on the criticisms made of the UCS. Suffice it to say here, I would hope that the council will improve the process in the future and use it as a positive means for identifying and bringing forward more significant numbers of windfall sites to feature as allocations in future plans.

viii) The requirement to allocate land for housing/Plan, Monitor and Manage – paragraphs 8.29 to 8.30A

2.34 I have concluded elsewhere that the Reserve Site at Emersons Green East should be released now for development. However, I consider that the council should, as part of the LDF process, seek to identify a pool of reserve sites so that if the monitoring of land supply shows that other sources of supply are not coming forward at the required rate, then a site or sites
from this source can be speedily brought forward. The new LDF process provides the means by which the housing land allocations can be formally reviewed and new ones brought forward, without the need for a complete review of all aspects of the local plan. By continuing work to identify possible future sites as part of this process the council should be in a position to bring forward new sites without undue delay. This should provide the flexibility necessary to properly manage the flow of housing sites. Given the short remaining life of this plan I have come to the view that it would not be appropriate for this plan to identify a list of reserve sites.

2.35 In the strategy section of my report I have considered the implications of the delays to the Light Rail Transit system to the strategy for development in the district and the council’s responses to that. I have concluded there that paragraph 2.17A should be deleted from the plan. For the same reasons, paragraph 8.30A should also be deleted.

ix) Figure 8.2 – The strategic requirement for land for housing in South Gloucestershire 1996 - 2011

2.36 This figure will need revising to both reflect my conclusions and recommendations and to provide the most up-to-date position as possible.

2.37 The plan as proposed to be changed by the council identifies 11 housing allocations under policy H1(A) providing for 4,540 dwellings. In reaching this figure I refer to Appendix 8 to Topic Paper 10, but have excluded Stover Road, Yate and adjusted the target for Horham Hospital. It also identifies a Reserve Site, Emersons Green East, under policy H1(B), with the potential for 1,500 dwellings. I comment on these sites in turn later in this chapter. After considering the allocation sites, I draw together my conclusions on the adequacy of sites to meet the housing requirement I have identified earlier in this section. In the strategy chapter I consider objections to the sequential approach to site selection.

Other matters

2.38 The relationship of the development strategy to the use of employment land for housing is considered in the Strategy section of my report. Objections that in essence relate to individual sites are considered later in this chapter or in the Omissions sites chapter 8a.

Recommendation

2.39 I recommend that the local plan be modified

i) by the rewording of policy H1(A) to address the meeting of the housing requirement:

"Provision is made for development for 17,760 dwellings in the plan area for the period April 1996 to March 2011. To that end, land is allocated ....."

ii) by the updating of figures contained in paragraphs 8.8 to 8.12 and Table 8.1

iii) by the redrafting of the supporting paragraphs 8.13 to 8.30, and

iv) by the deletion of Table 8.2 and its replacement based upon paragraph 2.22 above.
3. Policy H01(A)

Objections

512/518 BAE Systems Properties Ltd H01(A)
514/518 Bovis Homes South West Region & BAE Systems H01(A)
519/503 George Wimpey UK Ltd H01(A)

Issues

Should the reference to sites which have been previously used be deleted from the plan?
Do the allocations fail to provide for rural development needs?

Reasoning and Conclusions

3.1 Policy H1A lists all the sites allocated in the plan, some greenfield and some on previously developed land. On this basis there is no reason to re-instate the wording deleted in the revised deposit version of the plan. I consider more fully below, in item 4, and in the strategy chapter of my report the question of phasing and priority to previously developed sites.

3.2 The distribution of allocation sites between urban and rural areas is considered in the strategy section of my report.

Recommendation

3.3 I recommend that no modification be made to the local plan.

4. Paragraphs 8.31 –8.41 - Policy H01 - Sequential Approach to Site Selection

Objections

24/503 Mr Sprackman H01(A)8.41
41/505 Redcliffe Homes Ltd H01(A)8.38
41/506 Redcliffe Homes Ltd H01(OP) 8.39
265/523 Persimmon Strategic Land (Western) H01(A)8.35
274/007 South West RSL Planning Consortium H01(OP)8.31-8.41
274/504 South West RSL Planning Consortium H01(A)8.31-8.41
344/020 Sydney Freed Holdings & J S Bloor (Newbury) Ltd H01(OP) 8.31
380/004 South Gloucestershire Primary Care Group H01(A)8.24-8.30
403/019 Hartwell Plc H01(OP) 8.31
408/505 P & A Bennett H01(A)8.35
408/506 P & A Bennett H01(A)8.40
448/507 The House Builders Federation H01(A)8.34
409/505 North East Thornbury Consortium H01(A)8.35
409/506 North East Thornbury Consortium H01(A)8.40
431/524 Friends of the Earth H01(A)8.35
448/011 The House Builders Federation H01(OP) 8.33
448/508 The House Builders Federation H01(A)8.35
512/519 BAE Systems Properties Ltd H01(A)8.38
514/519 Bovis Homes South West Region & BAE Systems H01(A)8.38

Support

354/003 Council for Protection of Rural England (Avonside) H01(OP) 8.32
403/020 Hartwell Plc H01 8.32
408/020 P & A Bennett H01(OP) 8.37
408/021 P & A Bennett H01(OP) 8.34
408/507 P & A Bennett H01(A)8.41
409/021 North East Thornbury Consortium-Bryant Home Ltd H01(OP) 8.34
Issues

Is the previously developed land target reasonable?

Does the plan do all that it can to provide for priority to be given to previously developed sites and is this possible whilst still ensuring the achievement of the overall housing requirements?

A number of matters raised in objections to this section of the plan relate to issues also covered in the strategy chapter. To avoid repetition I have dealt with those matters in the strategy section of my report – these include the sequential approach to site selection, the role of the rural areas and other towns and villages in providing for housing, the loss of land previously identified for employment and other purposes.

Reasoning and Conclusions

4.1 The achievement of the housing land supply requirement necessitates the development of greenfield sites. It is clear that there is insufficient previously developed land and buildings to meet the district's housing needs. I have considered the plan's sequential approach to site selection in the strategy section of my report. The plan properly identifies previously developed sites and buildings as being the first port of call, as per the advice in paragraph 30 of PPG3. I agree with the view that there may in principle be such sites which, overall are less sustainable than other, greenfield sites. The tests in paragraph 31 of PPG3 are applicable. In practice, my application of the PPG3 paragraph 31 tests have not found any of the previously developed sites or buildings wanting – all the district lies within reasonable distance of urban areas or larger villages that provide jobs, shops and services, with some potential for improving public transport. No part of the district is so remote from these areas as to make previously developed sites in such locations unacceptable.

4.2 The plan properly seeks to give priority to previously developed sites, by seeking to allocate them where they are known. I do not see that this approach should materially affect the ability of achieving the desired level of affordable housing. The plan sets a target for the additional housing to be provided on previously developed sites. That target should reflect both the allocations and the substantial part of the windfall developments that are likely to take place on previously developed sites and buildings. Ideally, the target should be a demanding one, one that drives the prioritisation of sites and the managing of the housing land supply. However, here, I consider that it must be set essentially as a reflection of the current land supply position.

4.3 The reason for this is that I consider that there is little practical opportunity to manage the flow of housing land in such a way as to give real priority to previously developed sites. The remaining housing land requirement is a demanding one. The plan will have only about 5½ years to run, of a plan period of 15 years, from adoption date. There is no space for greenfield sites to be held back to any latter phases. The achievement of the housing requirement is dependent upon the development of a relatively small number of large sites. These sites have relatively long lead-in times and can only deliver the new housing needed over an extended period. To hold these sites back would seriously threaten the delivery of the housing requirement, including the affordable element. The introduction of phasing would mean that the delivery of new housing from several of the larger greenfield sites would be substantially delayed. In my view the delivery of the housing requirement must take precedence over any potential improvement in the proportion of previously developed sites that might possibly be achieved by holding back greenfield sites to the end of the plan period.
4.4 The first deposit plan contained a policy, H1(C), which set out the target for development on previously used land. That has been omitted from the revised deposit plan, with the target being set out in this section of text. I am content with that approach. Little would be served by retaining a figure within a policy.

4.5 Elsewhere, I have proposed that the reserve site at Emersons Green East should be given the status of an allocation, to be developed as soon as possible. In the interests of managing the housing land supply, the council needs to have other reserve sites to call upon in the event that close monitoring of the supply shows that sites are not coming forward as expected. My conclusions on individual sites identify possible candidates for this role.

4.6 In my consideration of the housing allocations and omission sites, I have had in mind whether it would be possible and better to adopt an approach of selecting a much larger numerical supply of small sites, rather than the plan’s selection of a few, large sites. Having considered the sites individually, I have come to the opinion that, for the most part, the council’s selection of sites is reasonable. The large sites chosen generally are the most suitable. To select less sustainable sites in the hope of allowing for some introduction of phasing would not be appropriate. The gains that might be achieved through having a larger bundle of smaller sites would be limited. Given the short remaining period of the plan, the leeway to manage the flow of sites to provide priority for previously developed land and buildings is very small indeed.

4.7 I appreciate that having a few, large sites also runs the risk of putting "all one’s eggs in one basket". If one large site were to be seriously delayed, then this could have a significant impact on the achievement of the housing requirement. However, from my consideration of each site individually, I am satisfied on the evidence presented that the larger sites are likely to come forward as planned and that as a result the housing land supply can be maintained. I believe that the commitment is there on the larger sites from the developers and the council and that any problems can be overcome so that the sites can be developed without delay. In my conclusions on individual sites, below, I have come to a view on the deliverability of new housing and what might reasonably be expected to be delivered on each site within the plan period.

Recommendation

4.8 I recommend that the local plan be modified to reflect those recommendations made elsewhere in my report that have implications for the content of these paragraphs.

5. Paragraphs 8.42-8.49 - Policy H01

Objections

| 29/505 | Mr G Lanfear | H01(A)8.48A |
| 267/024 | Arlington Property Developments Ltd | H01 8.47 |
| 380/001 | South Gloucestershire Primary Care Group | H01(A)8.46 |
| 380/002 | South Gloucestershire Primary Care Group | H01(A)8.46 |
| 380/003 | South Gloucestershire Primary Care Group | H01(A)8.46 |
| 512/520 | BAE Systems Properties Ltd | H01(A)8.44 |
| 514/520 | Bovis Homes South West Region & BAE Systems | H01(A)8.44 |

Support

| 379/501 | NHS Estates South West Region | H01(A)8.46 |
| 380/503 | South Gloucestershire Primary Care Trust | H01(A)8.46 |
| 380/006 | South Gloucestershire Primary Care Group | H01(A)8.46 |
| 380/007 | South Gloucestershire Primary Care Group | H01(A)8.46 |
Issues

Does the plan contain adequate arrangements for health care provision?
Should landscape requirements apply to all sites?
Who should identify what transport measures may be needed?

Reasoning and Conclusions

5.1 Paragraph 8.46 has been changed in the revised deposit plan to refer to health care provision. It cross references to policies S1A and S1. These provide a guide as to the provision for new facilities required as a result of the provision of new areas of housing.

5.2 Paragraph 8.44 indicates that any required landscape mitigation measures and future management will apply to both greenfield and previously developed sites. I see no problem with that approach. Consideration needs to be given to the landscape implications of new development wherever it takes place. The fact that consideration will be given to this matter does not mean that there will have to be mitigation measures and future management. That will depend entirely on the particular circumstances of each case.

5.3 Paragraph 8.49A, as amended by PC70, requires developers to identify transportation measures to, inter alia, reduce car dependency. The objection suggests that this is a job the council should do. It is clearly for developers to come forward with a package of measures to address the impact of their proposals on the highway network and the reduction of car dependency. My only caveat is, as I have expressed in the strategy section, is that the council should, equally, play a part in setting out more clearly its expectations as to what would be expected of developers of significant sites within the more congested parts of the district.

5.4 Changes incorporated into the draft revised deposit plan help to clarify a number of matters raised in objections.

Recommendation

5.5 I recommend that the local plan be modified in accordance with PC70.

6. Policy H01(A) and Paragraphs 8.50-8.55. Site 1 - South of Douglas Road, Kingswood

Objections

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<td>437/015</td>
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Issues

Should the site be retained for employment use?
Is this site genuinely available?
Is it suitable for a comprehensive scheme?
What density is the site capable of achieving?
Reasoning and Conclusions

6.1 This is a large site, extending to 4.6 hectares. It forms part of the very substantial employment area south of Kingswood town centre. It is very intensively developed with a mix of industrial buildings, some of considerable size and not all of them old and outworn. Although some of the buildings are vacant and in a poor state of repair, others are occupied and offer significant opportunities for employment locally. Elsewhere in its responses the council has been keen to support the retention of employment sites in this area in order to maintain a level of local employment opportunities. Here, the council has reviewed the future of this land in the light of advice in PPG3 and policy 30 of the JRSP. In recognition of its previously developed land status, the urban character of the surrounding area, the proximity of the Kingswood town centre and the wish to enhance its vitality the council has come to the view that it is suitable for a relatively high density housing scheme.

6.2 I fully acknowledge that this employment area is poorly related to the strategic road network and that there is considerable potential for conflict between the activities and traffic generated and residential amenity. To that degree I consider that there is some logic in reducing the scale of the employment area and in turn making best use of the land for high density residential development. However, I find it a little more difficult to square this process with the desire to retain local employment opportunities in the older parts of the built-up area of east Bristol.

6.3 I have insufficient information before me to show that the site is no longer capable of offering employment accommodation. Nor do I know if existing businesses are intending to move out. Clearly, the site still does offer employment accommodation, though the premises and layout may be far from ideal for modern requirements. There are environmental and traffic problems and the site does offer the potential for beneficial housing development. It is much harder to come to the view that the site is not required to meet economic development or local employment needs given the desire of the council elsewhere not to lose employment land that offers the opportunity for local employment.

6.4 The issue comes down to one of balance. I am willing to accept that the physical circumstances of much of this site, its poor condition and layout, its poor location in terms of the main road network and its close juxtaposition to a densely developed residential area, together with its particular potential for a high density housing development, together tip the balance in support of an allocation for housing. However, it is a finely balanced issue and one that may prove to be difficult to implement in practice.

6.5 I have no firm evidence as to the availability of the site for housing. One of the objectors suggests it is in two ownerships and that they are not willing to co-operate in bringing the site forward. Clearly as well as ownership issues there are a number of businesses that would need to relocate if jobs are not to be lost. It will not be an easy passage to achieve the housing numbers envisaged by the plan within the plan period. The council, in its housing land supply "worst case scenario" suggests that about 150 dwellings, of the 345 planned, would be completed by 2011. Given the circumstances of the site and its continued use, in part at least, I consider the council's estimate to be something of an optimistic view.

6.6 I accept that it is important that if this land is to be developed, then it must be on a comprehensive, planned basis. To do otherwise could mean that the potential of the site was not fully achieved and that the opportunity was missed to improve environmental conditions in the area. If agreement is to be reached on a comprehensive basis for the site's development then considerable obstacles will need to be overcome. Whilst I am content that the site remains as an allocation in the plan I retain considerable doubts as to how many dwellings will be delivered within the plan period. That adds weight to my conclusions reached elsewhere that further sites need to be allocated in the plan.
6.7 The suggestion is made that the scale of planning gain is too onerous, bearing in mind, too, possible contamination and remedial measures and that these could reduce the viability and in turn the potential of the site to provide the numbers of dwellings sought by the plan. I do not support that view. Any planning gain requirements must be seen in the context of the circumstances of the particular site and the economics of development. These would be a matter for negotiation at planning permission stage. I do not support the suggestion that the site should be reduced in scale or allowed to be developed on a piecemeal basis.

6.8 Finally, given the location of the site close to the town centre, I support the achievement of as high a density as reasonable possible. A density of 75 dwellings per hectare should be aimed at, reflecting the guidance in the third bullet point of paragraph 58 of PPG3.

6.9 In conclusion, I retain some concern about the loss of employment opportunities. On balance, I am content to accept that the allocation would not unacceptably conflict with policy 30 of the JRSP and the loss of employment opportunities, though every effort will need to be made to ensure that existing businesses are satisfactorily accommodated elsewhere. I am also sceptical about the ability of the site to deliver new dwellings by 2011. It seems to me that there can be no question of 345 dwellings being available by the end of the plan period. Even the council's scenario of 150 dwellings appears to me to be over-optimistic. Nevertheless, in order to assist in promoting the development of the site I am satisfied that the site should be retained within the plan, subject to a realistic figure being indicated for the level of contribution from the site to the plan's dwelling requirements in the period to 2011. I suggest a figure of 100 dwellings, though the council may be in a better position to set a figure. For the purposes of the housing land supply position I shall adopt a figure of 100 dwellings from this site for the period to 2011.

Recommendation

6.10 I recommend that the local plan be modified by the addition of a column showing a figure of 100 dwellings in policy H1(A) as the likely provision within the plan period.

7. Policy H01(A) - Site 1A - North of Douglas Road, Kingswood

Objections

268/505 Heron Land Developments Ltd H01(A)
343/008 Hallam Land Management Ltd H01 (Omission Site)
386/507 Sport England H01(A)
391/004 Galaxia Ltd H01(A)
506/517 Development Land and Planning Consultants H01(A)

Support

431/519 Friends of the Earth H01(A)
433/505 Save Our Undeveloped Land H01(A)

Issues

The issues raised in respect of this site are essentially those relating to the site south of Douglas Road, together with whether there should be a reference to sport and recreation provision.

Reasoning and Conclusions

7.1 This is a smaller site than that south of Douglas Road, extending to about 1.3 hectares. This site has been added to the plan at revised deposit stage, it previously having been identified as part of the wider employment area, subject of policy protection. It comprises a
disused car park. It clearly is logical to bring this piece of land back into beneficial use. I have considered the issue of the balance between employment and housing in this area in the previous item. For the reasons given there I accept the principle of a housing development in this location. In this case there is no direct loss of existing businesses, rather the loss of the potential for new employment. To that degree it sways the balance a little more towards the council’s position.

7.2 Because of the inter-mix of industry and employment around this site very careful measures will be needed to ensure that the new housing does not suffer from undue disturbance from the nearby works and, in turn, the existing works are not inhibited by the close proximity of the new housing. Because of the existing circumstances of this site I accept that it should be possible to achieve its full development within the plan period. I also support a development at the high density proposed by the plan, in order to maximise the use of this site close to the town centre. The provision of sports and other recreational facilities is adequately covered by paragraph 8.46 and other policies in the plan and I see no need to repeat them in this section of the plan.

**Recommendation**

7.3 I recommend that no modification be made to the local plan.

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**8. Policy H01(A) and Paragraphs 8.56-8.62 - Site 2 – BAe, Filton/Patchway**

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**Issues**

- Should the site be retained for employment uses?
- Is the site conducive to creating an appropriate residential environment?
- What density would be appropriate on this site?
- Can the development be accommodated without creating unacceptable highway conditions?

**Reasoning and Conclusions**

8.1 Following further detailed work, the council now proposes, by way of PCs 194 to 197 to reduce the gross site area to 7.2 hectares, with the net area suitable for residential development remaining the same. As a result, those parts no longer felt suited to a residential use will remain within the area safeguarded for employment under policy E3.

8.2 Much of the site is occupied by derelict buildings. Its loss from the employment land supply is not, in my view, a serious problem. This land is not needed for its historic purpose, as part of the airfield related operations, and the council is properly reviewing its employment land role. PPG3, and the proposed changes to it, call for employment land to be reviewed and,
where appropriate to reallocate for housing. Of particular relevance here is the JRSP’s expressed desire to secure a more balanced pattern of housing and employment in the area and for a greater mix of land uses in the North Fringe in particular. The loss of this site to housing forms part of the restructuring process for the North Fringe. To provide for its redevelopment for employment purposes would not sit comfortably with the economic restraint being placed upon this area by the strategic policies. Accordingly, I am content that this site is no longer safeguarded for employment purposes.

8.3 The site is tightly bounded by the A38 and its heavy traffic flows and the adjoining industrial activities. Clearly, noise is a potential problem, as is the general amenity and suitability of the surrounding area for a residential development. The plan recognises this. It identifies a net developable area of 5.8 hectares. The use of the airfield itself is not a serious problem, though the close proximity of the A38 and the industrial areas are significant factors. Any proposals would need to have close regard to the need to create an acceptable environment with reasonable living conditions. The terms of policies EP1 and EP4 would need to be met. I don’t doubt the challenge faced to create an acceptable residential environment, but find no convincing evidence that this could not be achieved on a site of this size. With skilful design, including a range of dwelling types, it should be possible to create an attractive development that meets the aims of policy D1.

8.4 A minimum density of 50 dwellings per hectare is sought. I have no evidence before me to demonstrate why this would not be achievable. Given the site’s location within the built-up area of the city and the good public transport links down the A38, it is entirely appropriate to aim for a density at the upper end of the range set out in the second bullet point in paragraph 58 of PPG3. If detailed design work shows that this is not compatible with achieving an acceptable residential environment, then a reduced number of dwellings would have to be accepted. That does not mean that the allocation should not aim for the higher figure of 50 dpha.

8.5 The Highway Agency is concerned at the potential impact of this development on the Trunk Road network. The council fully recognises that the transportation issues will need to be resolved prior to the development taking place. From the information available to me I find no convincing evidence that it should not be possible. I comment much more fully on the issue of traffic conditions in the North Fringe elsewhere in my report, at section 6 of the strategy chapter. I have come to the view that the North Fringe is capable of accommodating additional development. This site can play its part in the process of improving the balance between housing and employment and can benefit directly from the proposals the council has to improve the quality of bus services, most notably along the A38.

8.6 For all these reasons I conclude that this site can make a valuable contribution to meeting the housing requirements of the district. I propose to support the allocation, subject only to the changes introduced by PCs 194 to 197.

8.7 The objection made by Arlington Property Developments Ltd has been met by the revised deposit draft of the plan.

**Recommendation**

8.8 I recommend that the local plan be modified in accordance with PCs 194 to 197.
### 9. Policies H01(A) and M1 and Paragraphs 8.63-8.77 - Site 3 - Northfield, Filton Aerodrome, Patchway

#### Objections

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#### Issues

**Is this a sustainable location for development?**

**Employment**

- Should the site be retained/safeguarded for employment uses?
- Is 14 hectares of employment sufficient?
- Is the restriction to local employment justified?

**Residential**

- Is this airfield site conducive to creating an appropriate residential environment?
- How much housing should be provided and at what density?
- How many houses could be achieved within the plan period?

**Transport**

- Can adequate public transport provision made?
Reasoning and Conclusions

Sustainability

9.1 This site is central to the strategy of the plan. It extends to 74 hectares and is allocated in the revised deposit plan for housing, to provide 2,200 dwellings and for 14 hectares of employment land. It lies on the northern edge of the Filton airfield, but is no longer required by the owners for that purpose.

9.2 The site lies within the main urban area, within the North Fringe of Bristol. Although parts of the area are open and undeveloped, it has for many years been an integral part of the airfield. There are a limited number of buildings on the site, though the remains of former structures are in evidence. In my view it is right to consider the site as comprising previously developed land. The site falls within the fenced perimeter of the airfield and, therefore, accords with the definition set out in Annex C of PPG3.

9.3 As PPG3 notes, that does not mean that the whole of this area should be redeveloped. Only a relatively small part of this land is occupied by buildings, with the remainder being generally open in character. However, in this case, I believe that the allocation of all this land is fully justified. Lying within the PUA, it must be seen as being full square with guidance at a national, regional and strategic level in terms of the choice of locations for development. Further considerable weight is added by its status as previously developed land. This site offers a unique opportunity to make a very substantial contribution to the proportion of development to be provided on such land. Its allocation helps to limit the extent of greenfield land that will need to be developed over the plan period. It also allows for the introduction of housing into an area generally dominated by employment and retail uses, improving the balance of the area.

9.4 The site, being part of the airfield, was being safeguarded for employment use. Now, as it is no longer required by the current owners and occupiers of the airfield, it has become available for development. Given this position, it would be wrong to not to take advantage of the opportunity presented to allocate the land for development. It possesses significant locational advantages, and being previously developed, the decision is not whether to allocate, but, rather, what to allocate it for.

Employment

9.5 Turning firstly to employment issues. Some objectors seek its retention for employment purposes, either in terms of the long term needs of the airfield or, more generally, for future provision of employment land to serve the area. I accept that the presence of an operational airfield, used by the adjoining major employers is a unique facility. However, the evidence is that the loss of this site will not materially hinder the ability of the airfield to operate in its current fashion. Those existing major employers whose operations involve the use of the airfield should not be prejudiced by the loss of this land from the airfield. I have no evidence before me from them to suggest that their continued presence in this area and the development of their businesses would in any way be prejudiced by the proposals for this site. In any event, there is space to develop further, if needed, on the south side of the airfield. I see no convincing argument that would warrant safeguarding this land for possible future expansion by the existing major employers in the area.
9.6 The scale of use of the airfield has been determined by decisions made in the fairly recent past which have had the effect of favouring Lulsgate as the major airport in the region. Accordingly, the future prospects for expansion of the airfield appear limited. Whilst there may or may not be some chance of a general growth in those businesses who might benefit from locating alongside an operational airfield, the council is not starting with a blank canvas. The scope for any expansion of use of the airfield appears to me to be tightly prescribed. JRSP policy 61 and plan policy T14 refer. The site is located within the urban area and any increase in air traffic could seriously harm the local environment. I have no compelling evidence to suggest that there is a need to reserve the site for specialist industries that might benefit from a location adjoining an airfield. In these circumstances I see no case for safeguarding this site for possible airfield-related development at some time in the future.

9.7 The plan proposes to allocate 14 hectares for employment use. This has to be seen in the context of the JRSP's aim to secure a more balanced pattern of housing and employment across the area by restraining the expansion of employment uses in the North Fringe. I consider this thread of the strategy more fully in chapter 2 of my report. The guidance does not call for a total embargo on employment opportunities in the North Fringe. That would fail to recognise the importance of the area to the city's economy. Bearing in mind the relatively limited opportunities elsewhere in the North Fringe for employment development in the plan period, I accept the need for a significant area of employment land to be identified from within this site. It can provide a good opportunity for a high quality business environment.

9.8 One distinct advantage of providing a mixed development of both employment and housing on the one site is the opportunity it presents to create a degree of self-containment. This is an important consideration, particularly bearing in mind the concerns regarding traffic congestion in the North Fringe. Various estimates were provided for the scale of jobs likely to be created on a 14 hectare site. Although the policy provides for B1, B2 and small scale B8 uses, it seems to me likely that the emphasis will be more towards office type businesses, with their higher worker densities. Even so, I do not believe that the potential workforce on this site would approach the suggested 5,000 figure. This seems much too high, particularly if there is a mix of types of businesses. A figure of about 2,000, or even a little above, would appear to be a reasonable guess. That compares with an economically active population from the 2,200 dwellings of something up to or around 3,000. That seems to me to be a reasonable balance. Any larger employment area would work against the aims of the strategy for the North Fringe and any less could erode the role of the area in the city's economy. As planned, the site should provide an important contribution to meeting the employment needs of the area, whilst also contributing to the restructuring and re-balancing of the area.

9.9 The deposit draft plan policy referred to local B1 uses. The reference to local was removed in the revised deposit version but is proposed for reinstatement by PC71. The description of local B1 uses is helpful in the sense that it clarifies that the aim of the allocation is not to provide for large, in-coming businesses, but rather to accommodate the locally generated needs of expanding, relocating or new local enterprises. That aim has contributed to the decision as to the suitable scale of allocation to be made. However, the term has no meaning in the application of the policy to specific planning proposals. There is no support in national guidance for discriminating against individual companies because of their geographical origin. It would be entirely improper to judge applications on the basis of where firms came from. The market should allow for free movement of businesses. Accordingly, I do not support the reinstatement of the term "local" as sought by PC71. Nor do I see a need to change the wording of the text to specifically allow for or encourage certain types of industry.

**Residential**

9.10 Moving on to the residential development proposed; I am satisfied that a reasonable residential environment can be created here. One advantage of such a large site as this is that it can be planned comprehensively, enabling constraints and other problems to be tackled
within a well thought out design solution. The main problem here is not the operation of the
airfield. Although this does create noise and disturbance, this is intermittent in nature and not
of such a scale as to make the site unsuitable. With careful positioning of the various land
uses, the more sensitive uses can be located such as to be less vulnerable to unacceptable
levels of nuisance. As part of this, the employment areas can act as a buffer. I understand
that the engine testing facility has been moved away from this part of the airfield and should
not cause unacceptable nuisance.

9.11 The main potential amenity problem is that of traffic noise. The site fronts the A38 and
also Highwood Road. The proposals include a new link road to replace Highwood Road. The
evidence on noise points to parts of the site being subject to unacceptable levels of noise.
Again, however, I do not consider that this is a reason not to allocate the site. The site is
large enough to allow for the disposition of uses to take this noise issue into account such that
housing can be set away from the noisiest areas. Also, detailed design work on the layout,
design and orientation of properties can help to bring the dwellings within acceptable levels of
noise. Having regard to the advice in PPG24, Planning and Noise, I find no reason to think
that this is an issue that should prevent the allocation of this site. Likewise I do not find that
carbons about air quality are of such force as to warrant withdrawing the allocation.

9.12 This is a sustainable location for development and it is important to make the most
effective and efficient use of this previously developed site. I support the aim of developing at
a density at the top end of the range set out in the second bullet point of paragraph 58 of
PPG3. The site is sufficiently large as to enable a range of densities within the site, whilst
maximising the overall contribution. The land budget allows for about 16 hectares of land for
other uses. This includes land for a full range of supporting facilities and public open space. I
see no grounds for intensifying the development by reducing this amount of supporting
provision.

9.13 Finally, I turn to the question of how many of the houses would be completed within the
plan period. I have been presented with a range of views on this point. The revised deposit
plan provides for all 2,200 dwellings to be completed by 2011. That seems to me to be unduly
optimistic. The council in its housing land completions scenario suggests that, on a worst case
basis, some 400 dwellings would not be completed by 2011 and will thus not be counted as
contributing to meeting the plan's housing requirement. There are two elements here – the
likely start date and then the rate of development, once a start has been made. These by
their nature are very difficult to predict.

9.14 The site benefits from being in a single ownership and having only the one developer
involved in the pre-construction negotiations. That is a substantial advantage and I also
understand that a great deal of preparatory work has been undertaken whilst the local plan
works its way through the system. My early indication of my recommendation should also
have helped to progress this scheme without the need to await the production of the whole
report.

9.15 Nevertheless, I have some misgivings about the projected possible start date on site.
The owners suggest that the site could achieve a start in 2005. That seems to me to be
unduly optimistic. It suggests a detailed permission on Phase 1 by the end of this year. That
seems very unlikely indeed. Although negotiations will not involve many different interests,
nevertheless there are many important and difficult issues to resolve, including the details of
public transport provision and affordable housing. Whilst I am content to accept that, with
goodwill on both sides, these can be resolved without too serious a delay, I do not believe that
a start could be achieved on site so as to achieve delivery of housing during 2005.

9.16 I accept that the work can continue on the outline application and Environmental
Statement in advance of my report and further progress need not await the formal adoption of
this plan. Also, consultation can take place on the Development Brief quite shortly. The
council considers it prudent not to expect any completions on this site before 2006/7. Its note to the housing land supply RTS, meanwhile, suggests 50 completions pre April 2006 and 350 per year, each year, after that. I remain somewhat sceptical about a start date to achieve 400 dwellings by the end of March 2007. In theory it could be possible to achieve this, although there remains a distinct possibility that the intervening stages will take longer than anticipated. On balance, I believe that the council’s estimates are optimistic. There is still a long way to go in achieving the necessary approvals and preliminary on-site and off-site works necessary to enable the site to deliver new housing. It is difficult to determine with any degree of certainty a figure as to the likely commencement of completions on the site. On balance I am inclined to the view that the council’s figure for completions by March 2007 should be halved to 200 dwellings. Even that allows less than 2 years from my report through to start on site.

9.17 Turning to the rate of development once the scheme has started on the ground, the owners accept that a number of house-building companies would need to be involved. The capacity for completions would then be materially influenced by the state of the housing market in South Gloucestershire at that time. That clearly is an unknown and the assumption must be made that the market will be sufficiently buoyant to maintain the active interest of the main building companies. As regards specific rates of development, again various rates were suggested to me. Those achieved for Emersons Green may reflect a particularly buoyant period in the market and those referred to in Hampshire may reflect the particular circumstances there. I lean to the view that the suggested 350 dwellings a year is about the likely rate. Given the significant number of other sites programmed to be developed in the North Fringe area in this period I am very reluctant to support a rate on this site higher than the 350 per year. Thus, I do not support the idea that a higher rate could balance out any delays in the start of development.

9.18 Taking these factors together I come firmly to the conclusion that there is little prospect of achieving all 2,200 dwellings in the plan period. I have some doubts as to the possible start date, but I am inclined to accept that a sizeable contribution would be possible by March 2007. This is unlikely to be of the scale envisaged by the council. Allowing for slightly longer lead-in times I put forward the position that about 200 dwellings can be completed by March 2007. With a completion rate post 2006/7 of 350 dwellings per year about 1,600 dwellings could be achieved within the plan period.

9.19 Despite my slightly sceptical position I am willing to adopt that figure in terms of the housing land supply calculations. I do so on the basis that the Plan, Monitor and Manage approach means that provision will be kept closely under review, so that if there is a discernible shortfall, then measures can be taken to improve the overall level of supply by bringing other sites forward. The 1,600 is not a target or a ceiling figure. If I am wrong and more than 1,600 dwellings can be provided by 2011 I do not consider that this would present any conflict with strategic policies or create any problem.

**Transport**

9.20 I consider the issue of traffic conditions in the North Fringe in chapter 2 of my report. Clearly, this is an issue of some concern. This large site does not have easy access to a railway connection. However, it does have good access to a reasonable level of bus services. It would also benefit from the proposed comprehensive bus improvements along the A38 Quality Bus Corridor. A package of measures is being discussed with the developer which includes a range of improvements to bus services, both along the radial A38 and the Ring Road, connecting with employment, retail and residential areas in the North Fringe and city centre. This package should help to provide improvements to bus services that will have a knock-on benefit for the area. It will also be able to take advantage of the bus services centred on Cribbs Causeway. I accept the view that this site is not dependent upon the LRT or its successor and come to the view that the site is able to benefit from, and assist in,
improving bus services in the area. Developing within the existing urban area offers the best chance of securing shorter trips and the greater use of the public transport provided.

9.21 Overall, there is justified concern about the impact of more development in the North Fringe on traffic conditions. However, this site will contribute to improving the balance between employment and housing. By adding housing in this area, the opportunity is being created of a better mix of land uses, which should have the potential effect of reducing the levels of commuting into the area and enabling shorter journey-to-work movements. Additional housing, rather than a greater employment use of the land, is likely to spread the demand for road space across the day and will in turn create additional, geographically concentrated demand for further public transport. I am also of the view that the council is sufficiently focussed on this issue such that large schemes like this can be the catalyst for real improvements to the level of public transport. On the evidence available to me I am satisfied that this scheme can be accommodated within this area without unacceptably worsening traffic conditions in the area.

9.22 The Highways Agency is concerned at the potential impact of this development on the Trunk Road network. The council fully recognises that the transportation issues will need to be resolved prior to the development taking place. From the information available to me I find no convincing evidence that it should not be possible. I am of the view that the North Fringe is capable of accommodating additional development. This site can play its part in the process of improving the balance between housing and employment and can benefit directly from the proposals the council has to improve the quality of bus services, most notably along the A38.

9.23 The Highways Agency has also expressed its concern about the proposed link to supersede Highwood Road. In my opinion this road should improve accessibility locally and help to integrate the area with the Cribbs Causeway area. However, any unacceptable impact on the Trunk Road network will have to be avoided. I have insufficient information before me to ascertain the position in that respect, although I have no reason to suppose that it represents a fundamental bar to development taking place. This is something that the developers will have to resolve with the Highways Agency before planning permission can be granted. In all, the scheme will add to traffic in the area, but I conclude that that is acceptable in the context of the location of the site and the mix of development proposed.

9.24 Accordingly, I conclude that this allocation should remain in the plan, albeit I anticipate, for housing land supply reasons, that only 1,600 dwellings will be completed by 2011. I do not support PC71 which qualifies the type of employment. I am content with the minor changes introduced by PCs 72, 73 and 216.

9.25 I would also comment here, in the first of the large sites, that where it is able, the council should be as explicit as possible within the plan about the range of transport measures that will be needed as a result of each of the large developments. Accordingly, I make a formal recommendation here, inviting the council to add as much detail on transport requirements arising out of the larger developments where it is in a position to do so.

Recommendation

9.26 I recommend that the local plan be modified

i) in accordance with PC72, PC73 and PC216, and

ii) by the inclusion of a figure of 1,600 dwellings in policy H1(A) as the likely provision within the plan period, and

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iii) by the addition, where feasible, to this and the other large housing allocation sites, of a more explicit list of the transport measures that will be required arising from the development.

10. Policy H01(A) and Paragraph 8.78 - Site 4 - North of High Street, Marshfield

Objections

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<td>344/019</td>
<td>Sydney Freed Holdings &amp; J S Bloor (Newbury) Ltd</td>
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Issue

Does the site provide for an acceptable scale of development, in accord with the strategy for a sustainable pattern of development across the district?

Reasoning and Conclusions

10.1 The first deposit draft plan included within it a housing allocation north of the High Street, Marshfield. The 1 hectare site was then envisaged as providing for a minimum of 35 dwellings. That allocation carried forward the more westerly of the sites identified for development in the 1991 RALP. The revised deposit draft deleted the allocation, following concerns expressed by the GOSW about the inconsistency of the allocation in terms of the sequential approach to site selection contained in PPG3. In the meantime, the more easterly site identified in the RALP has been developed. This site has the potential to provide in the order of 35 dwellings, much of it on greenfield land. If development is considered acceptable here, then it is of such a size as to be appropriate for identification as an allocation.

10.2 The strategy of the plan is to concentrate development in the main urban areas. I have considered this in detail in chapter 2 of my report. I have found that the plan is able to accommodate almost all of the required levels of development within and around the Bristol PUA. The strategy does not require sites to be identified for housing outside the main urban area, in the villages. Whilst policies provide for a modest scale of development, through windfall sites, within villages it has not been necessary to extend the sequential search for allocation sites down to the level of villages such as Marshfield. To allocate a site in the village would be in conflict with the underlying strategy of the plan, as guided by national, regional and strategic guidance. Accordingly, I consider that the strategy provides no basis for allocating a site in Marshfield.

10.3 Clearly, national, regional and strategic guidance all provide for some development within the rural areas. The plan provides for some, limited development within the villages, under policies H2, H4, H5 and H7. Marshfield, although not a large village, is probably better suited than many of the other villages to accommodate new development. Indeed, it has experienced substantial development in recent years. The council indicates that 55 dwellings have been built in the village since 1996, with a further 23 with planning permission. The village has experienced and is capable of experiencing further incremental growth.

10.4 The advice in paragraphs 69 to 71 of PPG3 does not, in my view, support the allocation of land here for further planned development. It emphasises that only a limited amount of development should be accommodated in villages. That has already happened here. The
plan's policies allow for continued organic growth, including the provision of affordable housing on exception sites. The points set out in paragraph 70 of PPG3 are considerations, not requirements for development. This section of the PPG has to be read in context of the overall contents of the guidance. There is no compelling evidence that existing local services would become unviable without some planned growth. My conclusions on this point are re-enforced by the context of the village, essentially a dormitory settlement and not a remote, rural centre.

10.5 The objection site lies within the settlement boundary. It is partly gardens and fields and partly previously developed, by way of a transport yard. The council accepts that the redevelopment of the transport yard would fall within the scope of policy H2 as contained in the revised deposit draft plan. The balance of the site might also fall within the terms of the final paragraph of that policy; a paragraph the council now intends to delete. My recommendation in respect of policy H2 is to delete the limitation on development to that of previously developed land, so allowing for greenfield developments within the villages. However, as I have explained in relation to policy H2, I remain concerned that greenfield development within villages should be limited in scale and size. The situation should be avoided where the settlement boundaries are drawn widely to encompass large greenfield sites which have the potential to accommodate development that would run contrary to the strategy of the plan and the principles of a sustainable pattern of development across the district.

10.6 Marshfield does have a reasonable range of facilities, better than many villages of comparable size. It also offers a range of employment opportunities. It is possibly more self-contained than many other villages. Nevertheless, whilst there is the potential for residents to walk or cycle to a range of local services, the evidence points to a level of usage of public transport that is low. For many services and facilities, and for most people their jobs, residents are very dependent upon the motor car. Marshfield is relatively remote from the nearest urban area. So, whilst Bristol, Bath and other urban areas are within commuting distance, the journeys are, nevertheless, fairly lengthy. It is likely that most new residents will rely heavily on their own vehicles to travel out of the village for most of their needs. The bus services are relatively modest. They fall short in terms of the frequency set out in RPG10, with limited daytime services and none on Sundays and in the evenings. The village lies at the upper end of the travel times set out there. I have no doubt that housing in this location is likely to result in an increased need to travel, the large majority of which will be by car.

10.7 I note the different ownerships and parcels of land referred to in the evidence presented and the views expressed about the developability of the site and the achievement of an acceptable access. I have no reason to think that it would not be possible to develop the site in its entirety, in a manner acceptable to the appearance and character of the Conservation Area. I am aware of the possibility of a less comprehensive scheme, involving the transport depot, proceeding in the absence of a comprehensive approach. Whilst there are advantages in adopting a comprehensive approach, I do not consider these outweigh the objections to the scheme. In essence, the objections to the allocation of this site are of a strategic nature, rather than of a site specific one.

10.8 I accept that this site has been allocated for many years and remains within the village settlement boundary. However, national planning policies now place a much greater emphasis on achieving a sustainable pattern of development and current proposals must be judged against the latest planning guidance. In my view the allocation of the site would fly in the face of the strategy of the plan. The provision for a development of this size within this village location would be in conflict with the sequential approach to site allocations and the principles of sustainable development that underlie that approach. For this reason I do not support the re-instatement of this site as an allocation. One result of this recommendation is that an anomalous situation would remain. The settlement boundary would contain undeveloped, greenfield land, whose development is considered, in strategic terms, at least, as being undesirable. Much of this land does not naturally lie within the village bounds. It forms an
open, rural setting for this edge of the village. It seems to me that with the deletion of the allocation the question of the settlement boundary in this area needs to be revisited.

**Recommendation**

**10.9** I recommend that no modification be made to the local plan.

**10.10** I also recommend that the council revisits the issue of the settlement boundary in this location, with a view to redrawing it to reflect the extent of development that would be acceptable in this location.

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**11. Policies H01(A) and M2 and Paragraphs 8.70-8.86 - Stover Road, Yate**

**Objections**

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This site has had something of a chequered history during the preparation of this local plan. I consider the site and the objections made to it in chapter 7 of my report, under policy E1. For the reasons given there I support the plan’s original allocation of the site for employment use, with no housing provision. Accordingly I recommend no change to the plan under policy H1(A).

**Recommendation**

**11.1** I recommend that no modification be made to the local plan.

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**12. Policy H01(A) and Paragraph 8.86X - Site 7 - Former Woodstock Special School, Kingswood**

**Objections**

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<td>433/506</td>
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**Issues**

Should the site be retained for educational use?
Whether the site is suitable for a density as high as 50 dwellings per hectare.
Whether this section should include a statement on the provision of supporting facilities.

Reasoning and Conclusions

12.1 This site has been declared surplus to requirements and at the time of my inspection the buildings were in the process of being demolished. The council indicates that there is a growing surplus of school places in this part of the district and that there is no need to retain this site in education use. I have no evidence to refute this view.

12.2 The site lies within an established residential area and I see no reason why the council should not aim at the higher end of the density range suggested by the second bullet point of paragraph 58 of PPG3. If there are particular site constraints that might inhibit the achievement of a density of 50 dwellings per hectare, then that can be considered at planning application stage. In the meantime, the plan should set out the aim, which properly reflects the desire to make the most efficient and effective use of this urban site.

12.3 Paragraph 8.46 refers to the need to consider supporting facilities and the relevant policies. I see no need to add a reference to the text of each individual site.

Recommendation

12.4 I recommend that no modification be made to the local plan.

13. Policy H01(A) and Paragraphs 8.86A-8.86C - Site 8 - Waterworks Depot, Kingswood

Objections

| 380/510 | South Gloucestershire Primary Care Trust | H01(A) |
| 386/509 | Sport England | H01(A) |
| 440/003 | Bristol Water Plc | H01 (Omission Site) |
| 440/502 | Bristol Water Plc | H01(A) |
| 440/503 | Bristol Water Plc | H01(A) |
| 506/519 | Development Land and Planning Consultants | H01(A) |

Support

| 433/507 | Save Our Undeveloped Land | H01(A) |
| 440/501 | Bristol Water Plc | H01(A) |

Issues

- Should the site size and dwelling provision be left more flexible?
- Can the site provide as many as 65 dwellings?
- Whether this section should include a statement on the provision of supporting facilities.

Reasoning and Conclusions

13.1 This site is currently underused and is likely to become available for development during the plan period. Currently the council estimates that an area of 1.6 hectares will become surplus to requirements and so become available for development. Bearing in mind site specific development constraints, the council estimates that a net area of about 1.3 hectares would be available for development. I find no reason to quarrel with those estimates. Bristol Water suggests that the area likely to become available should be treated more flexibly, the
final position being dependent upon further study. For the sake of clarity it would be helpful to indicate that the developable area may be subject to change.

13.2 The site lies within an established residential area. I accept that any development here will be subject to particular, site-specific constraints. Nevertheless, I see no reason why the council should not aim at the higher end of the density range suggested by the second bullet point of paragraph 58 of PPG3. If there are particular site constraints that might inhibit the achievement of a density of 50 dwellings per hectare, then that can be considered at planning application stage. In the meantime, the plan should set out the aim, which properly reflects the desire to make the most efficient and effective use of this urban site.

13.3 Paragraph 8.46 refers to the need to consider supporting facilities and the relevant policies. I see no need to add a reference to the text of each individual site.

Recommendation

13.4 I recommend that the local plan be modified by the addition of a sentence to the supporting text to the effect that the developable area may be subject to change, following further study.

14. Policy H01(A) and Paragraph 8.86D - Site 9 - Cloverdale Drive and Cottonwood Drive, Longwell Green

Objections

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Issues

- Should the site be retained for educational use?
- Whether the site is suitable for a density as high as 50 dwellings per hectare.
- Whether this section should include a statement on the provision of supporting facilities.

Reasoning and Conclusions

14.1 This site has been declared surplus to requirements and I understand that the council is not seeking additional sites for schools in this area. I have no evidence to refute this view.

14.2 The net developable area appears to reflect the constraints on the development of the site. The site lies within an established residential area and I see no reason why the council should not aim at the higher end of the density range suggested by the second bullet point of paragraph 58 of PPG3. If there are particular site constraints that might inhibit the achievement of a density of 50 dwellings per hectare, then that can be considered at planning application stage. In the meantime, the plan should set out the aim, which properly reflects the desire to make the most efficient and effective use of this urban site.

14.3 Paragraph 8.46 refers to the need to consider supporting facilities and the relevant policies. I see no need to add a reference to the text of each individual site.

Recommendation

14.4 I recommend that no modification be made to the local plan.
15. Policy H01(A) and Paragraphs 8.86E-8.86N, Map Ref No 31 - Site 10 - Wallscourt Farm (Hewlett Packard), Stoke Gifford

Objections

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Issues

Is this a sustainable site for development?

What should be the scale of, and balance between, the housing and employment provision?

Reasoning and Conclusions

15.1 Hewlett Packard owns 67 hectares of land straddling the border with Bristol City. Some 59.1 hectares lie within the district. This land benefits from a planning permission for high technology purposes. To date only part of the site has been developed. Hewlett Packard wishes to safeguard 10.9 hectares for future employment expansion, with the balance being available for development. The current position is that the council is proposing 17.4 hectares for housing, providing 650 dwellings, leaving about 17.8 hectares safeguarded for future employment use. Hewlett Packard are seeking a different balance of uses, with an extra 7.9 hectares to housing, which would give a total of 24.3 hectares of housing land, providing for 900 dwellings and just 10.9 hectares safeguarded for employment use. Other objectors challenge the principle or extent of any release for housing. The council is proposing a number of changes to the text of the revised deposit plan by way of PCs 77 to 81.

Sustainability

15.2 It seems to me that the recent history of this site has more been lead by events than directed by the plan's strategy. As circumstances have changed, so the council has endeavoured to adjust the provisions of the plan. Be that as it may, the future of this land must be considered in the light of the current guidance and the plan's strategy as set out in chapter 2 of the plan.

15.3 The site lies within the main urban area, within the built-up area of the North Fringe of Bristol, within the Bristol PUA. It lies in close proximity to UWE and the major employment sites of the MoD and Sun Life. In my view there can be no doubt that it is suited for
development of some form, be that employment or housing or a mix of them both. Lying well within the built-up parts of the PUA, it must be seen as being full square with guidance at a national, regional and strategic level in terms of the choice of locations for development. In my opinion the site should be considered as coming before urban extensions in terms of the sequential approach to site identification.

15.4 The site was being safeguarded for employment use. Now, as it is no longer required by the current owners, it has become available for development. Given this position, it would be wrong not to take advantage of the opportunity presented to allocate the land for development. Given the scale of the requirements for the district and the evident suitability of the site for development and its significant locational advantages, it would not be appropriate to hold the land as long-term reserve for employment or other uses. The decision, in my view, is not whether to allocate, but, rather, what to allocate it for.

15.5 I agree with the council that the land available for development cannot be considered as being previously developed. Although within the same ownership as the now established Hewlett Packard site, this land is undeveloped grassland, separated from the developed site by a high security fence. It has not functioned to date as part of the developed site. It does not form part of the curtilage of the developed site. However, in terms of the sequential approach and the appropriateness of its allocation I do not see this as decisive. Although a green field site, its attributes are such as to warrant a high priority being given to the development of this site.

The balance between housing and employment

15.6 Having come to the view that there are strong reasons to allocate land here, the main question to be answered is how much of this should be housing and how employment? Turning firstly to housing, in terms of the sequential approach to site selection, this site must rank highly, above peripheral sites and the planned urban expansion at Emersons Green East. In terms of overall supply of housing land, I have concluded that there is a need for further sites to be allocated, both because of the level of requirement I have identified and also the shortfall arising from the ability of sites to deliver the anticipated amount of housing.

15.7 The allocation site and the land which the owners want included is all physically suitable for residential development. Such a development would sit comfortably within its immediate environs. Given this and my conclusions above, I do not accept the plan’s limit on the extent of the housing contribution from the Hewlett Packard land.

15.8 On employment land issues, I have concluded in chapter 2 of my report, there is no doubt that the Bristol area, and the North Fringe in turn, are important drivers of the region’s economy. This importance is recognised in the Aims, Visions and policies of the RPG10. Similarly, the JRSP recognises the economic strengths of the area in which the North Fringe plays a significant role. Alongside this recognition of the economic importance of the area, the JRSP in its locational strategy seeks to secure a more balanced pattern of housing and employment across the area by a range of policies including the restraining of the expansion of employment uses in the North Fringe. This would be achieved by diversifying development on existing land commitments, particularly providing for more housing and restricting new employment allocations. Policy 12 spells out more detail, including that provision for new employment should be restricted to sites which are suitable only for employment uses.

15.9 To that end the revised deposit plan, as proposed to be changed by the council, reallocates for housing 17.4 hectares previously committed for employment here, together with other reallocations in the area. This leaves a position that there is now, on the basis of the council’s Employment Land Availability Survey, 2003, estimate a total of 71.23 hectares of employment land in the North Fringe. This comprises the 14 hectares of employment land allocated within the mixed use site, Northfields, and 47.53 hectares of land within policy E3.
safeguarded land. In addition there is 9.7 hectares of land committed at the Combination Ground, for which a resolution has been made to grant planning permission for B8 uses.

15.10 On the face of it the identified 71.23 hectares, (including 17.8 hectares at Hewlett Packard) representing an annual rate of 8.90 hectares a year, appears to provide a supply not that much lower than that provided in the preceding period. However, as the council accepts, little of the land is immediately available and some sites may not be developed before the end of the plan period. Also pertinent is the availability of sites suitable for office developments. Offices have been by far the main element of the growth in employment in the North Fringe, about 80% of all employment land development has been for offices. I see no reason to think that this picture will not continue. Estimates advanced at the inquiry suggest that apart from the Hewlett Packard site about 19 hectares of land would be suitable and available for office development in the plan period. With the 10.9 hectares of land which Hewlett Packard intend to retain this means that about 30 hectares would be available for office developments in the period to 2011.

15.11 This figure allows for half of the Northfield site to be developed for offices, though there is no strong reason why more of the 14 hectares could not be made available for offices. With all the 24.3 hectares of surplus land at Hewlett Packard lost from employment, this would leave an overall supply of land for employment of about 64 hectares, 30 hectares of which being suitable for offices an annualised rate of 3.75 hectares a year. The key question is whether supply of the scale of 64 hectares of employment land, of which about 30 hectares would be suitable for offices, is too much, too little or sufficient for future needs having regard to the national, regional and strategic advice and guidance. The use of past trends is of limited assistance in this. The thrust of the JRSP as regards the North Fringe is to turn round past trends and use opportunities that arise to provide housing to redress the current imbalance.

15.12 In my view it is clear from reading the JRSP, policies 2 and 12, that the plan seeks to secure a better balance between housing and employment and to restrict provision of new employment sites to those which are suitable only for employment uses. A restructuring of the area is being called for. The imbalance between jobs and homes is the key concern here. Particularly telling in this respect is the comparison of economically active and jobs in the North Fringe. In 1991 there were 21,000 economically active and 35,000 jobs, an excess of jobs of 14,000. By 2001 the number of jobs had risen to nearly 59,000 whilst the economically active rose by nearly 9,000, giving an excess of jobs of 29,000. The council predicts that in 2011 even on the basis of the plan's reduction in employment land and its housing allocations jobs would have risen to 72,000, with economically active at 39,000. That means that even with the measures being taken by the plan the excess of jobs over the economically active population would have continued to rise, to over 33,000. Being very close to a substantial concentration of employment, with two major employers and the University this site is very well placed, at a very local level, to help redress the current imbalance.

15.13 The council has not advanced any model of the desired mix of employment land and housing land that should be aimed for in the North Fringe nor any formula of how much new employment land there should be in relation to the scale of residential development proposed. It is, therefore, much more of a subjective process to determine how much employment land should be made available. The plan clearly does not draw a line under past employment land provision and stop all future employment development potential. The guidance does not call for a complete halt. To do so could seriously harm the vitality of the area and its contribution to the economic wellbeing of Bristol and the northern sub-region.

15.14 On paper the provision of about 64 hectares of employment land, of which a little under half is likely to be suitable for offices seems generous. It allows for an annual rate of 8 hectares per annum of employment land and 3.75 hectares of offices. The amount of non B1 land identified would provide sufficient at past rates for many years after the end of the plan
period. Much of these sites are committed or are on industrial estates where some room for expansion is desirable in the context of a vibrant local economy.

15.15 The amount of office accommodation does give me more concern. It is important to provide a range and choice of sites. Not all sites allocated are likely to be completely developed by 2011. Some sites are very much linked to the expansion of existing enterprises, as is the case with the Hewlett Packard site, and may not become available on the open market. Even so, there is still a significant amount of land with office development potential available. Substantial employment opportunities are being provided only a little distant from the North Fringe, at Emersons Green East.

15.16 There is also a considerable amount of office floorspace available on the open market, though I prefer the council's estimate of this rather than the more generous figure advanced on behalf of Hewlett Packard.

15.17 Given that there is now only 6½ years to run of the plan period I find little support for the argument that the potential of 30 hectares is too little and could harm the economic prospects of this key area. It allows for office developments to continue, at a slower rate that reflects the JRSP's concerns. It allows for considerable areas of land to be reallocated or identified for housing. On the other hand it is not so limited as to reduce the opportunity for some continued growth which reflects the economic importance of the area.

15.18 I do not consider that this level of provision would harm the role of the North Fringe as a driver of the economy of Bristol and the wider sub-region. The North Fringe could not possibly be expected to continue to grow at the exceptional rate it has over the past twenty years. That is out of the question. Rather, the level of provision provided for in this plan allows it to consolidate that role, without making conditions worse.

15.19 In conclusion on this issue, I support the principle of seeking to maximise housing provision on the Hewlett Packard site, involving the reallocation of land from employment use to residential. I am content that the scale and type of employment land that would remain available in the North Fringe is reasonable and reflects both the economic role of the area and the thrust of the JRSP desire to seek a restructuring of the area.

Other matters

15.20 Overall, the plan provides for a considerable amount of new residential development in the North Fringe. This recommendation and those elsewhere will add to that amount. I see no difficulty in principle with concentrating a very substantial slice of the new housing allocations in this area. This site is a sustainable location for new housing, one that can take advantage of the superior accessibility and range of jobs and services and facilities offered by the area. In this connection an enlarged Hewlett Packard housing site should, together with the Coldharbour Lane and Stoke Park sites provide the critical mass to facilitate and support a range of new community facilities, including a new primary school. I leave the details of these to the council, except to comment that by the time that the plan is prepared for adoption the council should come to a conclusive view as to on which site the primary school should be located and should firmly indicate this within the plan.

15.21 I leave the details of the protection and maintenance of the Splatts Abbey Wood to the council.

15.22 Compared with an employment use of the whole site, the figures presented in evidence suggest that a housing development on the whole site would result in lower peak hour flows. The council's own figures suggest a reduction in peak hour flows with a wholly housing development compared with the current plan's position. Whilst an employment use of the whole site appears unrealistic at the current time, the effect of slightly reduced peak hour
flows arising from an all-housing proposal is to be welcomed. A housing development is likely to spread the peak over a longer time. Nevertheless, I see the slightly lower peak hour resulting from a wholly residential scheme an advantage.

15.23 The proposals would allow for the reservation of a route through the site for a rapid transit system, whatever form that may take. In deciding to support the allocation of the larger site for housing, I have placed little weight on any perceived disadvantage in layout terms of having to accommodate both a mix of uses and a rapid transit route on the surplus land. The development of the site should also assist the provision of the Romney Avenue Bus Link, an important component of the package of improvements to public transport provision within the area. With the close proximity of the relocated bus interchange at UWE and other measures being proposed by the council, I am satisfied that the site would benefit from a good level of access to bus services. If a rapid transit system develops, then the site is excellently placed to benefit from it.

15.24 This is clearly a sustainable location and I support every effort being made to maximise its use. Because of its location close to a major employment area and its access to a good level of public transport, I agree with the council that any housing development here should seek to achieve the top end of the range of housing densities advocated in the second bullet point of paragraph 58 of PPG3. That said, I do not consider that the site is so well located to public transport facilities to justify a density higher than this.

15.25 In conclusion, I support the allocation of all the surplus land at Hewlett Packard for residential development. There is an adequacy of employment land and a need for further residential land. In this situation I consider that priority should be given to a residential development. The site is immediately available and I see no reason why a substantial proportion of it should not be achieved within the plan period. The council in its "worst case" scenario suggests that about 200 of the then 650 dwellings would not be completed by 2011. I see no reason why a rate quicker than the 100 per year might not be achieved. However, bearing in mind the work needed before a start can be made on site and the size of the development, I am of the view that it would be reasonable to assume that about 700 dwellings could be completed by 2011, with the balance of 200 being delivered after that date. I should make it clear that the 700 dwellings should not be taken as a ceiling for development before 2011.

15.26 The use of the larger site for housing accords with guidance in PPG3 and the JRSP on the re-allocation of employment land and with regional, strategic and local plan locational strategy. The addition of this level of housing should not prejudice the development of the Emkers Green East site, which is promoted at a strategic level in the JRSP. I leave the council to make any necessary changes to the supporting text to reflect my conclusions and recommendation.

Recommendation

15.27 I recommend that the local plan be modified

i) in accordance with PCs 77 to 81, subject to the enlargement of the Wallscourt Farm site to 24.3 hectares, to provide a minimum of 900 dwellings, 700 of which are likely to be completed by 2011.

ii) by the addition of a clear indication of which of the two sites, Wallscourt Farm or Coldharbour Lane should accommodate the primary school.
16. Policy H01(A) and Paragraphs 8.86P-8.86W Map Ref No 32 - Site 11 - Land East of Coldharbour Lane, Stoke Gifford

Objections

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Issues

Should the site be reserved for University use?
If not, is this a sustainable site suitable for allocation?
Should it be allocated for residential development?

Reasoning and Conclusions

16.1 This 12.6 hectare site was previously granted planning permission, now expired, for university/education purposes. It has now been declared surplus to their requirements by UWE. The council now proposes to allocate it for housing, a net 9 hectares to provide 450 dwellings at a density of 50 dwellings per hectare. The council is proposing a couple of minor changes to the text of the revised deposit plan by way of PCs 82 and 83. The owners envisage a development in the order of 540 dwellings, though in later correspondence refer to a development of 500 dwellings, based upon a feasibility study.

University use

16.2 The site was previously identified for university purposes. UWE have now declared it surplus to its requirements. Thus, it has become available for other development. Some criticism, is made by objectors, of the UWE changing its position. I am not wholly convinced that it makes good sense for the University to give up this site. This land immediately adjoins the main Frenchay campus. It would be eminently suitable for an expansion of the campus if this were needed. The only other undeveloped land in the immediate area, outside of the green belt, is the Harry Stoke site, which is far less well placed, being physically and psychologically separated from the campus by the Ring Road. It is clearly very difficult to predict what the University land needs would be in the longer term. The danger here is that the best opportunity for a future physical expansion of the campus would be lost forever. If this site is developed for market housing the opportunity would be lost to provide further academic accommodation and student accommodation. With much of the student accommodation being in the city centre and academic facilities being concentrated on the Frenchay campus the inflow of students each day to this area is very large.
16.3 Thus, I do have some misgivings about the possible short-term nature of any decision on this land. However, I have no real evidence before me that would lead me to reject the development of this site for other uses. My misgivings are, to a large degree allayed by the work undertaken by the University. The University has taken a comprehensive look at its future needs and has considered the future capacity of the existing Frenchay campus to accommodate further development. As a result it has produced a Masterplan which indicates the potential for what is a considerable expansion on site. This envisages meeting its current, identifiable needs, providing both for academic accommodation and student housing. One of the driving forces has been the aim of providing accommodation for all first year students and to that end about 2,600 students bedspaces are planned on the existing site. Planning permission has been granted for the proposals included in the Masterplan.

16.4 I accept that this demonstrates the capacity of the site to enable the University to considerably develop its role for some time into the future. Though one might quarrel with the ten years or so timespan involved, it does become very difficult to make predictions of needs in the much longer term. However, in this matter, the University must be the best judge of the situation and I, therefore, do not find that I am in a position to say that the site should continue to be reserved in the long term for University purposes.

16.5 I acknowledge the role of the University in the economy of the immediate and wider area. It has contributed and will continue to contribute to the prosperity of the Bristol area. I have no reason to believe that the University's continued contribution to the area's prosperity and longer term economic prospects will in any way be hindered by the loss of this site. The Masterplan shows a continuing development of the Frenchay campus and I have no evidence that the University would not be able to continue to expand its academic role and contribution to the economy of the area.

**Sustainability**

16.6 The site lies on the edge of the main urban area, between the built-up area of the North Fringe of Bristol and the green belt. It is situated opposite the main UWE campus, with the Bristol Business Park to the north and new housing at Stoke Park to the south west. It was previously identified for education purposes, as an expansion of the UWE campus. I do not give much weight to the fact that it was previously identified for development. Greater weight needs to be given to the current position and the site's inherent locational merits and its place in the sequential approach to site selection.

16.7 The site is a greenfield one. It lies on the edge of the main urban area, between it and the green belt boundary and in my view can be considered as being within the PUA of Bristol. Its position, adjoining the main UWE campus, close to major employment areas makes it a suitable site for development. In physical terms it represents a logical expansion of the main urban area, completing development up to the natural boundaries for built development. The woodland and the lie of the land, with the green belt land beyond, sloping away down to the M32 corridor effectively contain and define the site as being part of the urban area, rather than the more open land to the east and south. In my view it complies with guidance at a national, regional and strategic level in terms of the choice of locations for development. The site should be considered as being a suitable urban expansion site, appropriate for allocation for development in the plan period. Given the scale of the requirements for the district and the suitability of the site for development and its locational advantages, it would not be right to either hold the land as a long-term reserve or to decline to take advantage of the opportunity presented to allocate the land for development.

**Residential development**

16.8 In terms of the sequential approach to site selection, this site must rank fairly high amongst peripheral sites. This site is physically suitable for residential development. Although
bounded by an employment area and the University campus I see no reason why development could not sit comfortably within its immediate environs. Coldharbour Lane does not present a substantial barrier to pedestrian movement. The site would benefit from the very good level of public transport in the area, centred upon the University bus station, notwithstanding the future move of the bus station to another location on the campus. It is not immediately served by the safeguarded rapid transit route and so may not be as well able to benefit from any provision to the same degree as other sites may. However, together with the development of the Hewlett Packard site and the Stoke Park development it should be possible to contribute to and benefit from a reasonable level of facilities locally, particularly a primary school, without the need to travel further afield.

16.9 The site is well located to major employment sites and is not remote from other residential areas and a good range of shopping and other facilities. The area generally is well served by buses. Bearing in mind the relative closeness of the Abbey Wood and Parkway stations and the existing and proposed bus network through the area, including the Romney Avenue Link, I am satisfied that the site represents a reasonably sustainable location for residential development. I find that the site would not unacceptably conflict with the guidance in PPG3 on site selection, including that contained in paragraph 31. It may not be so well placed as sites set within the built-up area and other peripheral sites, such as Harry Stoke. Nevertheless, and notwithstanding the absence of a comparative study of all the options by the council in the run-up to the preparation of the plan, in my opinion its attributes are such, and the need for housing of such a level, that its allocation is fully justified.

16.10 I have concluded in chapter 2 of my report, there is no doubt that the Bristol area, and the North Fringe in turn, are important drivers of the region's economy. This importance is recognised in the Aims, Visions and policies of the RPG10. Similarly, the JRSP recognises the economic strengths of the area in which the North Fringe plays a significant role. Alongside this recognition of the economic importance of the area, the JRSP in its locational strategy seeks to secure a more balanced pattern of housing and employment across the area by a range of policies including the restraining of the expansion of employment uses in the North Fringe. This would be achieved by diversifying development on existing land commitments, particularly providing for more housing and restricting new employment allocations. Policy 12 spells out more detail, including that provision for new employment should be restricted to sites which are suitable only for employment uses. On the basis of my conclusions there, I see no strong reason to prefer an allocation or reservation for employment use.

16.11 Overall, the plan provides for a considerable amount of new residential development in the North Fringe. This recommendation and those elsewhere will add to that amount. I see no difficulty in principle with concentrating a very substantial slice of the new housing allocations in this area. This site is a sustainable location for new housing, one that can take advantage of the superior accessibility and range of jobs and services and facilities offered by the wider area. In this connection this site together with an enlarged Hewlett Packard housing site and Stoke Park sites should provide the critical mass to facilitate and support a range of new community facilities, including a new primary school. I leave the details of these to the council, except to comment that by the time that the plan is prepared for adoption the council should come to a conclusive view as to on which site the primary school should be located and should firmly indicate this within the plan.

**Other matters**

16.12 This is a sustainable location and I support every effort being made to maximise its use. Because of its location close to a major employment area and its reasonable access to a good level of public transport, I agree with the council that any housing development here should seek to achieve the top end of the range of housing densities advocated in the second bullet point of paragraph 58 of PPG3. That said, I do not consider that the site is so well
located to public transport facilities to justify a density significantly higher than this. The evidence produced suggests a capacity of about 500 dwellings on a net area of 9 hectares. The site is for the most part well screened from the green belt and views from the M32. The southern edge would require some careful treatment to avoid impacting on views from the green belt, but otherwise I see no strong constraints on the site which would hinder the maximising of the site's potential. I therefore propose to increase the allocation to 500 dwellings, though the council and developer will need to reassess this when detailed plans are prepared. What is important is that the development should aim to achieve at least a density of 50 dwellings per hectare.

16.13 The site is in one ownership and, for the most part, is immediately available. The council, in its "worst case" scenario on housing land supply suggests that 100 dwellings may not be completed before the end of the plan period. The owner suggests a two-phased development, the latter phase awaiting the removal of a temporary car park, necessitated by the development on the main campus site. Delays on the main campus proposals could mean the need to keep part of the allocation site in temporary car park use for longer. However, this is only a small part of the overall site and there remains sufficient leeway in the timing to allow for a little slippage. Overall, I see no reason why a complete scheme should not be achieved within the plan period.

16.14 I leave the council to make any necessary changes to the supporting text to reflect my conclusions and recommendation.

Recommendation

16.15 I recommend that the local plan be modified

i) in accordance with PCs 82 and 83, subject to an increase in the numbers of dwellings sought to 500,

ii) by the addition of a clear indication of which of the two sites, Wallscourt Farm or Coldharbour Lane should accommodate the primary school.

17. Policy H01A and Paragraphs 8.86AA-8.86KK - Map Ref No 1 - Site 12 - Hortham Hospital, Almondsbury

Objections

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Issue

Whether the site is sustainable and appropriate for allocation.

Reasoning and Conclusions

17.1 The Hortham Hospital site extends to 32.5 hectares and lies within the green belt. Following the closure of the hospital the site has had a complicated planning history. Proposals have been advanced for its development for housing. As yet these proposals have not been finally determined. Following a council resolution to grant planning permission for housing, the Secretary of State called in the application. The Secretary of State's subsequent decision to refuse permission, contrary to the Inspector's recommendation, was then successfully quashed. A second Secretary of State decision letter, again refusing permission, was then successfully challenged, the Secretary of State submitting to judgement. A third determination is currently awaited.

17.2 In my conclusions under policy GB05, in chapter 5 of my report, I indicate that I am entirely satisfied that this site be considered as a Major Developed Site in the green belt. There, I have also support the changes which define the site on the Proposals Map and limit the developable area to approximately 9 hectares. The revised deposit plan provides for a development at a density of 25 dwellings per hectare, producing a total of 225 dwellings. The developers and the council now consider that 9 hectares of the site is capable of being developed at a density of 30 dwellings per hectare, resulting in a capacity of 270 dwellings (PCs 160, 161, 173 and 188 refer). PCs 84, 174, 175 and 176 propose additional wording in respect of Sustainable Drainage Systems, to support live/work units, the provision of a small community hall and the provision of 1.5 car parking spaces per dwelling. In the following paragraphs I consider whether the site should be included within the plan as an allocation.

17.3 As regards the contents of the local plan, if by adoption time the First Secretary of State has granted planning permission, then the site should simply be listed under Appendix 13, sites with planning permission for residential development. There would be no need to specifically allocate the site. My conclusions below assume that this is not the case. The Secretary of State has been concerned about the sustainability of the site, in particular in terms of the sequential approach to site selection, the criteria in paragraph 31 of PPG3 and the increased need to travel. These issues very much exercised the Inspector who considered the appeal. It is not my intention to revisit in detail all the considerations covered at length by that Inspector in his report, nor to forensically examine the contents of the two decision letters from the Secretary of State.

17.4 In my view the starting point must be my conclusions on the treatment of this site as a Major Developed Site in the green belt. I have no doubt that it is right to consider this as such a site and I have supported its designation in this local plan accordingly. As a result, there is no conflict with green belt policy. Redevelopment, in principle is not inappropriate and I see no reason why the criteria in paragraph C4 of PPG2 should not be capable of being satisfied. A scheme need have negligible impact upon the openness of the green belt. The evidence presented confirms that this is the case.
17.5 As a Major Developed Site in the green belt, it does not fit readily into the PPG3, paragraph 30, sequential approach to site selection. It lies outside the main urban area, within the countryside. It is outside the PUA and cannot be said to comprise an urban extension. However, on the plus side, it does comprise previously developed land and it does lie close to the main urban area. As the sequential approach in paragraph 30 does not directly address the issue of sites such as this, there must be an assumption that the delivery of a previously developed site is acceptable subject to no fundamental conflict with the tests of suitability such as set out in paragraph 31 of PPG3 and in PPG13.

17.6 This site can make a material contribution to the previously developed land target. The housing requirement can only be met if greenfield sites are also developed. If this site is not allocated in the plan, then its place would need to be taken by greenfield land. I also place weight on the fact that this site can be developed without delay. The plan's housing provision is very much dependent upon a few very large sites. As a result there is likely to be a short term slow down of housing delivery as these larger sites gear up to deliver their housing mainly in the latter years of the plan period.

17.7 I accept the view put that housing is the best use of the site and that an employment use could have significant disadvantages. That said, accessibility is an acknowledged problem here. The site lies beyond the urban area of the North Fringe and is physically separated from it by the M4/M5 motorway junction. The development of the site would create a small residential enclave in the countryside. It does not have the sort of critical mass that could generate and support a good level of public transport. However, the developers propose a package of measures to make improvements to the bus network and to pedestrian and cyclist facilities. These measures will link the development directly into the public transport network and make walking and cycling safer and more attractive. It is also proposed to limit car parking spaces to 1.5 spaces per dwelling. The plan provides for an element of affordable housing together with a range of housing sizes and types.

17.8 There is a modest range of community facilities and services in Almondsbury which could be reached on foot or by bicycle. The site is close to the Quality Bus Corridor along the A38, from where buses would provide a reasonable service across the North Fringe and elsewhere. Because of the closeness of the North Fringe those journeys made by car need not involve lengthy distances to reach a wide range of employment areas and full supporting facilities and services. I accept that the site is less well placed than some others adjoining the built-up urban area and that public transport funding is time-limited. However, I find that there is no fundamental conflict with the guidance in paragraph 31 of PPG3. What weaknesses in this respect have to be judged against other factors.

17.9 The shortcomings of this location are not so pronounced in my view compared with some other peripheral sites being proposed by objectors. The site is, in green belt terms, suitable for development and would bring back into productive use a site currently deteriorating badly. This can be done without harming the openness of the green belt. I see little material benefit in simply letting the site lie idle until some future date when it is determined that the time is right that it should come forward. To my mind the deletion of this site from the local plan would necessitate its replacement by other land. That other land would be greenfield and any replacement site is unlikely to be so superior in sustainability terms as to outweigh the advantages offered by this site.

17.10 On the evidence available to me I am content that a density of 30 dwellings per hectare can be achieved here, though I fully accept that it would not be appropriate to go to a density above this. A scheme built at a greater density and/or greater physical height could have a material impact upon the openness of the green belt.
17.11 For these reasons I support the allocation of this site, assuming planning permission has not been granted in the interim. I recommend the proposed changes advanced by the council.

**Recommendation**

17.12 I recommend that the local plan be modified in accordance with PCs 84, 102, 160, 161, 173, 174, 175, 176 and 188.

**Inspector’s Note:** PCs 106 to 109 introduced into the plan an additional housing allocation at Catbrain Lane, Cribbs Causeway. Subsequently objections and supporting representations were made to this. However, as the housing development appears to be underway I shall take no further action on this matter.

**18. Policies H01(B) and Paragraphs 8.87-8.108 and M3- Site 6 - Emersons Green**

**Objections**

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Note; I have considered issues of principle in chapter 2 of my report. There, I have accepted that this is a sustainable location for development. I have also accepted the broad split between housing and employment land. This section goes on to consider issues of detail and timing.

Issues

Should the site be held as a reserve or should it be made available for development now?

How should the safeguarded 40 hectares for development post 2011 be treated?

What should be the balance between housing and employment uses?

How sustainable is this site?

Reasoning and Conclusions

18.1 The Emersons Green East site is allocated for a mixed use development. Under policy H1(B), the residential element, of 1,500 dwellings, will not be permitted before 2006 unless monitoring of the rate of dwelling completions, the availability of land for housing and buildings for conversion and re-use justifies a change. No such time restriction is applied to the employment element of the site. A significant proportion of the site, 40 hectares, is safeguarded for development post 2011. I comment on the general sustainability of this location in the strategy chapter of my report.

Timing of the release of the site

18.2 It is evident that the local plan gives no clear mechanism as to what would trigger the early release of this site. If the site is to be held as a reserve, then the plan needs to set out
what events would trigger its release. However, I am far from convinced that it is appropriate to treat this site as a reserve, for development post 2006. Firstly, the phasing date of 2006 is, in itself, fairly meaningless. With this report being published at the end of 2004 and consideration by the council in early 2005, there is little real prospect of the site coming forward before 2006 in any event. Secondly, it is unclear to me why this site, strongly backed by strategic guidance, should be held back as a reserve. Delaying its contribution until after 2006 would do little or nothing towards giving priority to previously developed sites. Thirdly, given my conclusions elsewhere on the extent of the housing land requirement to 2011, and on the likely contributions from the individual allocation sites, there is a need for this site to make a substantial contribution to the housing provision in the plan period. This is a large site. It will require a fairly substantial lead-in time before development can start on site. In order to make a substantial contribution to the housing land supply it is necessary to start the process without undue delay. There is no strategic support for delaying the release of this site. For these reasons I recommend that the site lose its “reserve status” and be listed as an allocation site alongside all the other allocation sites.

**Land safeguarded for development post 2011.**

18.3 Paragraph 4 of policy M3 provides that 40 hectares will remain safeguarded to meet development needs beyond the plan period. I take no strong objection to that in itself. Indeed, it makes some sense to introduce some form of phasing into a development of this scale. However, the plan does not give any clear lead as to what the form of that development would be. In one sense that is understandable in that decisions can be made nearer the time when the land is needed. On the other hand, leaving the question of uses and timing to a later date does make the overall planning of the wider area east of the Ring Road much more problematic.

18.4 Given the strategic nature of the overall site and the advantages of planning comprehensively, not least in terms of layout, disposition of uses and the range of supporting community facilities and services, I see very clear advantages in the plan setting out the broad scope of the proposals for the whole of this strategic area. The remaining area of land, 40 hectares, is simply too large to ignore in planning the future of the site and the services and facilities needed to support it. This should go beyond the very broad expressions in the Concept Statement and should provide a greater degree of certainty.

18.5 This would commit future development plans to the development of this land. However, that is not a problem. I see that this is already done by JRSP policy 13. A lack of clarity as to the future of the whole of this site could inhibit the proper planning of the area. I am not in a position to determine the housing/employment split of this further 40 hectares. That is something the council will need to give consideration to. An early view would enable a Development Brief to be drawn up, which would ensure that the early stages of development would fit within a proper, well considered and comprehensive framework.

18.6 Whilst the planning of the area would benefit from a clear overview of the whole of the remaining Emersons Green site, this should not be seen to inhibit future subsequent changes, post this plan, if circumstances require it. It may be necessary to adjust later stages of the development to reflect the situation at that time. That could be achieved within the framework established by the Development Brief and the early stages of the development. Those parts not expected to be developed in the plan period should be safeguarded to meet needs beyond the plan period.

**The balance between housing and employment**

18.7 The plan proposes a re-allocation of the land from a Science Park and other employment to that of a mixed development. The scaling down of the Science Park reflects the lack of a direct access from the M4 and fears that a development of that scale and nature could harm
the regeneration prospects elsewhere in Bristol and Weston-super Mare. The original allocation for employment purposes would have been seen in the context of creating a mixed use development in the wider Emersons Green area. However, although a large area is being re-designated for housing, a substantial area, some 45 hectares, is being retained for employment purposes, with the prospect of more on the proposed 40 hectares of land to be safeguarded in the plan to meet development needs beyond the plan period. In terms of the scaling down of the employment provision, Emersons Green should not be seen in isolation from its surroundings. Within reasonable reach are the extensive employment areas of the North Fringe. This proposal should help to provide and support an orbital bus service to those locations.

18.8 Although only 20 hectares is now being promoted for non-specific employment purposes, this still represents a significant area as sought in JRSP policy 13. The allocation of an additional 50 hectares as sought by Nicholson Estates and Harcourt Developments is not justified by compelling quantitative evidence. What is proposed in the plan seems to me to accord with the thrust of guidance in the JRSP, including policies 2, 12 and 13, guidance that is not materially undermined by the RPG. The proposals would move towards a better balance. There is no imperative to secure a complete balance. An extra 50 hectares would allow a scale of development that seems well beyond current levels of need in this part of Bristol and could have the effect of creating a "North Fringe" scenario in this area, contrary to strategic objectives.

18.9 In my view the substitution of housing for some of the former employment allocation will help to achieve a better balance locally between homes and jobs. The provision of 45 hectares of employment land to be developed by 2011 should be more than sufficient to balance out locally the level of housing and job opportunities, so providing for the employment needs of the resident population of the wider Emersons Green area.

18.10 Currently there is an imbalance with significantly more economically active than jobs in the wider Emersons Green area. A range of figures were presented as to future levels of economically active and the jobs to be created. I do not intend to get drawn into too precise figures but on the figures presented it seems to me that they suggest that the development of 1,500 more homes and the 45 hectares of employment would see the balance swing back to a much better match in the Emersons Green area between jobs and homes. Some of the jobs may be relocations from the older built-up areas of East Bristol, and many of the new jobs may be taken up by those living in the older areas of East Bristol. That is one of the main purposes of providing employment opportunities in this location.

18.11 However, I do not consider that this justifies going further and creating a substantially larger employment area. The evidence suggests that the council has probably got the balance about right. In Emersons Green as a whole something approximating to a balance will be reached. It does not seem to me that there is strategic support or justification for seeking to go further and try and achieve a comparable balance over the whole of the wider area of east and north-east Bristol. That is unrealistic with the city centre so close by. If, over time the balance is shown to be wrong, or there is a clear need for additional jobs, arising perhaps from a decline in the traditional employment sites within the conurbation, then there is the scope for adjustments in respect of the balance of the larger site which will not be developed until after 2011.

18.12 I note the views expressed about the different function of the Science Park and the other employment area.Whilst the Science Park may provide a different type of job to that provided for on the 20 hectares, these jobs would be potentially available for the local workforce. It seems to me that in the context of East Bristol the plan has struck about the right balance. Certainly, I have no convincing evidence before me to justify going to the level of employment land sought by Nicholson Estates and Harcourt Investments. Employment development on that scale could seriously overburden the local road network. A mixed
development with a substantial element of housing would appear to offer the better chance of securing real and lasting improvements to the public transport system in the area. The housing will be backed by a range of measures to try and ensure that the area is both relatively well self-contained and is supported by a number of measures to minimise reliance on the motor car.

18.13 In a wider context, development of further employment land beyond that provided for in the plan could create an imbalance between housing and employment in this part of Bristol. Problems of concentration and imbalance and resulting highway congestion could be exacerbated here. At the same time this could undermine the JRSP's wish to encourage regeneration elsewhere in the city and across the wider area. To allow for a scale of employment to 2011 beyond the 45 hectares could increasingly work against the wider, strategic aim of encouraging employment to locate in the less prosperous areas of south Bristol and around Weston-super-Mare. Policy EC4 of the RPG10 does not justify the identification of a Major Strategic Site in this location.

18.14 The provision of a junction with the M4 now appears to be extremely unlikely. This has lead to the scaling down of the Science Park element of the scheme. Permission exists for a 25 hectare Science Park and that is reflected in the allocation. PCs 165 and 166 allow for some degree of flexibility, to allow for the expansion of the Science Park if demand necessitates. Whilst that must be right, I feel that the case for a larger Park appears to be thin. Whilst the JRSP allows for an extension of the Park it specifies that that should be on a scale that does not prejudice the overall plan strategy. Without the provision of a direct access unto the M4 the suitability of this site for a larger Park is severely reduced and the benefits seem to me to be very strongly outweighed by the disadvantages. I am content that the plan's references to the Science Park, of approximately 25 hectares, are reasonable. I see no reason for further reference to be made to the Science Park in the strategy chapter. Nor do I see any justification in these circumstances for seeking to increase the physical extent of the Science Park.

18.15 I do have some sympathy for the view of Bristol City Council, who are concerned that the Science Park does not become a general, large scale B1 office development. In recognising the history and benefits to the wider area of establishing a Science Park here, I agree with the objector that the text of paragraph 8.91 should be tightened up to maintain the integrity of the Science Park. I recommend some wording that should reflect this aim, without being over-prescriptive.

18.16 Finally, on employment matters, I comment in item 9 above on the use of the term "local" employment, reinstated in the policy by PC85 and in the supporting text by PC86. Whilst it is reasonable to consider issues of demand, need and the amount of land to be identified in terms of locally-generated or inward employment demand and needs, it is not appropriate to try and control employment development proposals on a geographical basis of origin. I do not, therefore, support the use of the term "local" in the wording of the policy or the text.

**Housing provision**

18.17 The plan indicates that a density of 50 dwellings per hectare will be sought, that is at the top end of the range in the second bullet point of paragraph 58 of PPG3. It is important to try and maximise the contribution from the allocated sites in order to minimise the scale of greenfield development. This is a large site and I see no reason why it should not be possible to provide a mix and range of types of dwellings to achieve this density. Having come to the view that this site should form one of the allocations in the plan, the question is then raised as to what level of provision could be achieved by 2011? The plan provides for 1,500 dwellings by 2011, though I do not see that as a definitive guide. It appears to me that this site is not so advanced in its planning as the Northfield site. On that large site I have assumed a
contribution of about 1,600 dwellings by 2011. On this site I consider a later start is likely to be made and suggest on this basis a figure of about 1,200 dwellings by 2011. I comment more fully on this below.

**Highway and transport issues**

18.18 The Highway Agency has made a holding objection because of the potential effect on the trunk road network. It will be for the council and developers to satisfy the Agency that the development can be undertaken without unacceptable impact upon those roads. From the evidence I see no reason why this cannot be done.

18.19 As I have said before I do not have before me a coherent or comprehensive sustainability assessment on a site by site basis. Thus, it is very difficult to come to firm conclusions on sites on any comparative or individual basis. Various views have been advanced on the sustainability of this site, some backed by detailed analysis, others more based on assertion. Detailed technical assessments can hide a multitude of assumptions. I do not believe that I am in a position myself to undertake a detailed, forensic examination of all the aspects for each site. Of necessity, I have looked at this site and others on a fairly pragmatic basis, taking a fairly broad-brushed approach.

18.20 I have commented more fully on traffic issues and the sustainability of this site in the strategy chapter. Here, the evidence produced indicates that a residential development would have the greater capacity to support a reasonable level of public transport services. Employment uses are more likely to generate high concentrations of flows in the peak hours, albeit those flows would be, to some degree at least, against the main tidal flows along the Ring Road. A package of measures is being discussed for this site. This includes a range of measures for junction improvements along the Ring Road, an MMI and improvements to bus services locally and along orbital and radial routes. Clearly, reservations must remain as to what overall impact this will have on the level of dependency on the car and the degree to which existing, improved or new services will actually offer a good alternative to the car. It seems inevitable that the private car will continue to provide the main means of travel for very many local people.

18.21 It will be important to ensure that the Ring Road does not represent, in practice, a barrier to the integration of this development with the main body of Emersons Green. Integration is essential to helping to reduce the reliance on the motor car. Development of the remaining part of the area offers an opportunity to materially improve services that would also benefit the currently poorly served Emersons Green West. Provided this can be achieved, the range of uses encourages self sufficiency in the Emersons Green area and with the package of measures proposed I am satisfied, on balance, that this is a suitable and sustainable site for development. The advantages and opportunities offered by the development of the site outweigh the disadvantages of its peripheral location.

18.22 Traffic levels are likely to rise and the council will need to monitor closely and respond to the effects of the development, particularly on traffic flows along the Ring Road. Although not having the potential for non-car journeys offered broadly within the North Fringe area, I consider that this site offers the opportunity to complete the Emersons Green development in such a way as to improve the current self-sufficiency of the wider area. Its relationship to the built-up edge of the city is such that the overall impact of journeys is likely to be less than if this scale of development were sited more remote from the conurbation, adjoining one of the outlying urban areas.

**Phasing of development**

18.23 Clearly it will not be possible for the whole of the Emersons Green area to be completed by 2011. The plan will need to indicate the extent of the provision that will be achieved by
that date. I note the suggested completion rates advanced by the developer. A start date on site is unlikely to be achieved until towards the end of 2006/2007 at the earliest. I am not convinced that an annual rate of 400 units could be sustained in this location and for the purposes of the housing land supply exercise I suggest that about 1,200 dwellings could be achieved here, a rate of 300 dwellings per year in the final 4 years of the plan, along with the 45 hectares of employment. That does not mean that a figure of 1,200 should be used as a ceiling figure. If I am wrong in this, then the council will have to make adjustments elsewhere to the supply and flow of housing land.

18.24 I think that there is some force in the view that the residential element should be tied in some way to progress on employment development, to avoid exacerbating the current imbalance. This may be difficult to achieve in practice and could slow down the provision of the new dwellings required to meet the overall district-wide housing supply. I make no recommendation on this point, though the council may wish to give some further thought as to whether it is desirable and possible to phase the housing according to progress on the employment elements of the proposals, without prejudicing the achievement of the housing provision.

Other matters

18.25 PC 163 should satisfy the concerns relating to the working of the nearby Shortwood Claypit. PC217 makes a minor wording change, which I support.

Recommendation

18.26 I recommend that the local plan be modified

i) by the deletion of policy H1(B),

ii) by the inclusion of the housing element within policy H1(A), of which 1,200 would be likely to be provided within the plan period,

iii) by the rewording of policy M3.3 to indicate that it is expected that about 1,200 of the dwellings will be completed within the plan period

iv) by the rewording of policy M3.4 to indicate the likely mix of uses of the balance of the site, together with details of those parts of the overall development that are not expected to be completed until after the end of the plan period, but are to be safeguarded to meet development needs post 2011.

v) in accordance with PC163, PC165, PC166 and PC217,

vi) by the amendment of the fourth sentence of paragraph 8.91 to read: "The council will therefore restrict occupation of buildings within the 25 hectare area designated as a Science Park to uses primarily falling within class B1 which will contribute to the objectives of the Science Research Park."

19. Policy H01(A) and Paragraph 8.109 - Land at Severnside

Additional Text after paragraph 109

Objections 29/502 Mr G Lanfear H01(A)8.109
19.1 Paragraph 8.109 in the first deposit draft simply made reference to JRSP policy 14(a) which raises the prospect of land at Severnside being suitable for residential development, subject to the resolution of major constraints. This paragraph is deleted in the revised deposit version. I have considered issues related to Severnside in chapter 2 of my report. There I have concluded that there are very substantial constraints to achieving development. Most development will not happen until well after the plan period. It seems to me that the area needs to be planned on a comprehensive basis and that there is no prospect of a satisfactory resolution of the major constraints in the short term. Any residential development should only come forward in the context of an overall, long term plan for the area. In view of this I do not consider that it is realistic for the plan to make any provision for housing within the Severnside area within this local plan.

19.2 In any event, the paragraph that has been deleted served only as a cross reference to the JRSP policy and served no useful purpose. For the same reason I do not support the suggestion from Heron Land Developments Ltd that there should be added a reference to policy 8 of the JRSP in respect of Yate.

Recommendation

19.3 I recommend that no modification be made to the local plan.

20. Policy H01(C)

Objections

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Support

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This policy has been deleted in the revised deposit plan. I comment upon previously developed land targets in item 4 of this chapter.

21. Housing land supply

I draw together here my conclusions on the overall land supply and the allocations necessary to achieve that level of supply

The housing land requirement

21.1 I have concluded, in item 2 above, that there is an overall housing land requirement for 17,760 dwellings. Allowing for what has been built, commitments and windfall developments, I calculate that there is a residual need to identify land to provide for a total of 5,981 dwellings over the remaining years of the plan.

The supply

21.2 On the basis of my conclusions in respect of the plan’s allocations and their likely contribution through to 2011, I consider that the contribution from the sites included within the revised deposit plan should be as follows:

- Site 1 South of Douglas Road 100 dwellings
- Site 1A North of Douglas Road 95
- Site 2 BAe Filton/Patchway 290
- Site 3 Northfield, Filton 1,600
- Site 6 Emersons Green East 1,200
- Site 7 Former Woodstock Special School 50
- Site 8 Waterworks Depot, Kingswood 65
- Site 9 Cloverdale Road, Longwell Green 50
- Site 10 Wallscourt Farm (Hewlett Packard) 700
- Site 11 Coldharbour Lane 500
- Site 12 Hortham Hospital 270

These provide a total of 4,920 dwellings by 2011, an overall shortfall to be made up of 1,061 dwellings.

21.3 In addition to these sites, I have identified, in chapter 8a of my report, the following sites which should be allocated for development:

- Old Colstonians Playing Fields, Filton 70
- Harry Stoke, Stoke Gifford 900
- Coopers Works, Westerleigh Road, Yate 35
These would provide a further 1,005 dwellings.

21.4 Thus, the sites I have identified are in broad parity with the housing requirement. I fully acknowledge that the assumptions I have made about the deliverability of individual sites may not stand the test of time. Some would argue I have been unduly pessimistic, others that I have been over optimistic. All I can say is that I have made best guesses in the light of the evidence before me.

21.5 What these figures mean is that I am satisfied on the evidence that the recommendations I have made in respect of allocations and omission sites do not, in total, unacceptably under or over provide in relation to the identified housing land requirement. I do not, therefore, seek to make further changes on the basis of meeting the overall housing requirement. The council will clearly need to keep the resulting housing land supply under close and continuing scrutiny, so that if my conclusions on deliverability are not borne out in practice, then further action would need to be taken.

22. Policy H02 and Paragraphs 8.110-8.123A - Residential development within the existing urban areas and the boundaries of settlements

Objections

24/504 Mr Sprackman H02
29/008 Mr G Lanfear H02 8.121
29/014 Mr G Lanfear H02
29/506 Mr G Lanfear H02 8.119A
30/501 Hanham Abbots Parish Council H02
35/502 Oldbury-on-Severn Parish Council H02
41/003 Redcliffe Homes Ltd H02
41/002 Redcliffe Homes Ltd H02
41/508 Redcliffe Homes Ltd H02 8.110
49/015 Crest Nicholson Properties Ltd and ICP Properties Ltd H02
52/006 The Tortworth Estate Company H02
52/502 The Tortworth Estate Company H02
52/503 The Tortworth Estate Company H02 8.110
142/002 Alvis Brothers Ltd H02
146/003 Mr & Mrs D Jenkins H02 8.110-8.126
180/039 Joint Parishes Consultative Committee H02
181/042 Yate Sodbury Liberal Democrats H02
182/042 Yate Town Council H02
198/501 Marshfield Parish Council H02
198/511 Marshfield Parish Council H02 8.110
254/039 Sodbury Town Council H02
261/001 Hoddel Associates H02 8.110
261/501 Hoddel Associates H02
282/002 Diocese of Gloucester H02
282/503 Diocese of Gloucester H02
283/068 Government Office for the South West H02
283/507 Government Office for the South West H02
283/508 Government Office for the South West H02
285/010 Crest Nicholson Residential (South West) Ltd H02
299/040 Westerleigh Parish Council H02
300/039 Dodington Parish Council H02
302/505 Charfield Parish Council H02
302/506 Charfield Parish Council H02
306/002 G & S J Smith H02
315/002 RMC Group Services Ltd H02 8.119
322/014 Wilson Connolly H02
322/502 Wilson Connolly H02
344/022 Sydney Freed Holdings & J S Bloor (Newbury) Ltd H02
349/013 Hewlett-Packard Ltd H02
354/508 Council for Protection of Rural England (Avonside) H02
375/001 Mr K S Rogers H02 8.124
394/005 Mrs Churchill H02
Support

19/001 Dr J W Tyler H02 (Settlement Boundary)
203/030 Frampton Cotterell Parish Council H02 8.118
260/001 Mr G Stock H02
403/022 Hartwell Pic H02 8.111
421/001 Dr J H Jackson H02 8.124-8.125
431/066a Friends of the Earth H02
431/534 Friends of the Earth H02

Issues

Should the support for development within settlements be limited to previously developed sites?

Does the policy provide for a sustainable pattern of development?

Does the density policy adequately reflect PPG3 guidance.

Reasoning and Conclusions

This policy and supporting text has generated a considerable number of objections. The majority of these relate to criterion A and the final paragraph of the policy. Others relate mainly to other aspects of the policy itself, with a few raising aspects of the supporting text. A number of rewordings are suggested by objectors. I deal first with objections to the policy itself, and then consider those objections directed at the supporting text.

Policy H2

22.1 Policy H2 has had something of a chequered history. At First Deposit stage the plan, by way of criterion A, limited the support for residential development proposals within settlements to previously developed land. Thus greenfield sites within settlements would not enjoy the positive support of policy H2. At Revised Deposit stage a rider was added to the policy such that small sites, that is less than 0.5 hectares, would not be subject to criterion A. Thus small scale development of small sites would be permitted whether or not they comprised previously developed land. The Council subsequently, through Proposed Change 87, decided to delete this rider. As a result, the policy in the Revised Deposit Plan reverts back to the first Deposit version, allowing development within settlements only where it is on previously developed land.

22.2 I can find no basis within national, regional or strategic guidance to support the Council's position. The sequential search approach in PPG3 refers to the re-use of previously developed
land and buildings in the urban area, then urban extensions and finally new development around nodes in good public transport corridors. It does not make specific comment as to where other sites within defined settlements should come within any search sequence. In my view it would be a misinterpretation if this omission were taken as to mean that greenfield sites within settlements were to be discouraged. This search sequence does not rule out greenfield development – the latter two categories clearly would involve the development of greenfield sites.

22.3 PPG3 does state, at paragraph 36, that no allowance should be made for greenfield windfalls. That reference is made within the context of examining the housing land supply position and the determination of how much land needs to be specifically allocated to meet the strategic housing requirement. It would be a misapplication, and in my view unjustified, to apply that wording to mean that proposals should not be allowed on greenfield windfall sites. Indeed, Tapping the Potential looks to "vacant land not previously developed" as a source of new housing sites.

22.4 The plan defines a hierarchy of settlements, with most new development being directed to within the urban areas, reflecting guidance at all levels that points to the concentration of development within the main urban areas. The plan also defines settlement boundaries for a range of smaller settlements, within which some development will be permitted. All these areas are clearly considered suitable for development, albeit the scale of development would be very limited in the smaller towns and villages of the District. These defined settlements, in broad terms, offer the more suitable and sustainable locations for development, generally taking advantage of existing infrastructure and the close proximity of facilities and services. One of the thrusts of PPG3 is to make the most efficient use of land. To inhibit the development of otherwise suitable sites within defined settlements would be to fly in the face of the overarching objectives of national, regional and strategic guidance.

22.5 The council does not suggest that allowing development on greenfield sites within settlements would materially affect the plan's overall locational strategy. It is more concerned with giving priority to previously developed land. A possible circumstance where it would be reasonable to preclude development of greenfield sites within defined settlements would be where the housing land requirements could all be met by previously developed sites. Where an appropriate supply of previously developed land has been identified in an up-to-date UCS to meet the 5 year development requirements some restrictions on greenfield sites might be justified. The policy would then ensure that this 100% previously developed land position could be maintained and not diluted by greenfield sites being allowed. This position manifestly does not apply to this district. It is accepted by the council that a substantial amount of the local housing supply and allocations would have to be on greenfield sites, including a reserve greenfield site. The effect of artificially holding back greenfield sites within settlements would be the compensatory need to find greenfield land outside those areas to make up the overall housing requirement. Thus the application of policy H2, as it stands, would do little to affect the overall balance between previously developed and greenfield sites.

22.6 Clearly, it is a central aim of national guidance to give priority to previously developed land over greenfield sites. I do not consider that criterion A would have that effect. Nor do I consider a relaxing of this policy would materially alter the prospects for development on previously developed sites within settlements. The scale of development of greenfield land within settlements is likely to be low. In overall terms dwellings coming forward on previously developed sites should, through the Plan, Monitor and Manage approach, be given priority over greenfield sites. It was the Council's intention to apply phasing, through the greenfield Reserve Site at Emersons Green East, though my conclusions on that topic suggests that this would not be appropriate. Elsewhere, I have highlighted the difficulties of introducing meaningful priority to previously developed sites, due in no small part to the short time horizon of this plan. Nevertheless, it seems to me that the prospects of any impact on the overall rate of bringing forward previously developed sites would be so small, such that those concerns are far
outweighed by the advantages of achieving the potential of suitable and sustainable sites within the existing built-up areas.

22.7 The Council indicates that over the 7 years to 2002/3 there has been an average of 139 dwellings per year coming forward on greenfield sites. These reflect planning permissions granted pre the plan period. The UCS has identified significant amounts of greenfield land in settlements and allocated these. The UCS is expected by the Council to have picked out the larger greenfield urban sites and the numbers, therefore, likely to come forward on other greenfield sites within settlement boundaries is expected to be lower, albeit the Council thinks that it might not be that much lower. Greenfield sites within settlement boundaries are a finite resource. Once they are developed they become previously developed sites. They will begin to become used up. Unless settlement boundaries become more widely drawn, the supply is likely to diminish. The plan itself picks up a number of greenfield sites and allocates these. It is my considered view, having spent a great deal of time visiting and walking round the settlements outside the PUA that the scale of potential development offered by suitable small greenfield sites within the towns and villages is quite limited.

22.8 I conclude that the removal of criterion A would not materially alter the balance of development between preferred strategic locations and rural settlements. With or without criterion A, the scale of development that would be likely in the smaller settlements is not likely to be significant, particularly bearing in mind that settlement boundaries have been drawn quite tightly around the towns and villages. The deletion of criterion A would not, therefore, have a great deal of effect upon the housing land supply, but it would allow the development of sites that are otherwise quite suitable and appropriate for development. Bearing in mind the overall need to develop on greenfield sites I do not consider that the deletion of criterion A would have any material impact upon the rate at which previously developed sites come forward over the plan period.

22.9 That is not to say, of course, that all undeveloped land within settlements should be built upon. A major concern of many objectors is that all open land within settlements would be built upon as a result of removing criterion A. That is not a view I can support. It does not justify the blanket approach applied by this policy. There are likely to be many sites where there are compelling reasons why they should remain undeveloped. Indeed, in my consideration of objections promoting greenfield sites within settlements, I have concluded that many of them are unsuitable for development for a variety of reasons, including their contribution to the area in terms of landscape and amenity. In addition to the other criteria of this policy itself, there are other policies in the plan, such as LC9 and L6, that are aimed at protecting important spaces. It is clear from evidence submitted that development proposals on greenfield sites within the urban area have been successfully resisted by the council through the application of such policies. Those policies should be robust enough to protect those pieces of land that should remain undeveloped.

22.10 For the most part, the small scale and potential of sites within the smaller defined settlements means that there would be no pressing reason to make any explicit reference to sustainability or the sequential approach in this policy. No differentiation between locations would be necessary in this policy between the larger, more sustainable settlements, and the smaller, less sustainable villages provided that, in all cases the potential sites in the smaller villages were only of modest size, in scale with the size of the settlement concerned. However, that may not always be the case and there may be just a few places where the potential is for sizeable developments in small villages. The redrafting of policy H2 should not ignore these limited occasions where there may be a potential for sizeable developments that would not be sustainable and would sit uneasily with the sequential approach to site selection.

22.11 This is less of a problem with previously developed land within defined villages, given the desirability of achieving development on such sites. As regards greenfield sites, because of the generally tightly drawn boundaries and the relatively few, and dwindling, undeveloped
sites within settlements this again is unlikely to be a major problem. In general terms, I do not think that this policy would be likely to undermine the plan’s approach of directing development to the most sustainable locations, in accordance with PPG3 advice. The level of potential within the villages identified in paragraphs 8.114 to 8.116 is likely to be low. What development that is likely to take place should help to provide a modest level of provision to support and sustain local services and meet housing needs arising in those settlements. However, I do believe that a bottom line needs to be drawn so as not to allow for development that would clearly be unsustainable and in conflict with the underlying aims of the development strategy and the sequential approach. Whilst it is difficult to define with precision where the line should be drawn between sustainable and unsustainable levels of development within villages, it is possible to draw up some criteria against which any such windfall scheme can be assessed.

22.12 I suggest a wording that will apply to those greenfield sites within the villages which have the potential to provide a level of housing that would be out of scale with the existing size of the village. The intention is that small scale development – which can be defined within the supporting text – which provides incremental, organic growth would be acceptable. In terms of the villages a level of development of more than about 5 or 6 dwellings seems to me to begin to have the potential to represent unsustainable development. Village greenfield sites with a greater potential than this would then be subject to a sustainability test in terms of whether the site would be capable of being served by a reasonable level of public transport provision and whether there would be easy access to a range of local facilities and employment opportunities.

22.13 I shall, therefore, recommend the deletion of criterion A. I also recommend that a new criterion be added to ensure that sites within villages were consistent with the principles of sustainability.

22.14 I am also hesitant to support any additional criterion that introduced a test of need. It is extremely unlikely that an Urban Capacity Study would identify sufficient land such that no windfall sites were to be needed. I see no justification for limiting development to small sites only. In the urban areas these may be able to make a useful contribution to housing land supply. Such a move would be arbitrary in nature and inappropriate for the reasons I have given in this section. The final paragraph of the policy, as well as introducing the exception of small sites, includes a comparison test with allocated sites. Not only would such a test be very difficult to apply in any meaningful way it is also unnecessary. I shall also recommend the deletion of the whole of that paragraph.

**Other criteria.**

22.15 Various rewordings have been put forward. I see no need to add a criterion that reflects the need to respect the character of a settlement. That is already covered by criterion B and other policies in the plan.

22.16 Criterion C aims to achieve maximum density compatible with the site's location, accessibility and surroundings. Proposed Change 136 seeks to add to criterion C a reference to the contribution a site makes to the immediate area and to the value of achieving a mix of densities within communities. Whilst they may be relevant factors it is important that they do not diminish the emphasis on achieving the efficient use of land. I am not persuaded that a mix of densities is of such importance as to be a significant factor in the policy. National guidance in PPG3 seeks to make the best use of land, avoiding developments that make inefficient use of land – those of less than 30 dwellings per hectare. The plan makes no explicit reference to this aspect. I believe that it is lacking in this respect. Whilst some sites may prove sensitive to high density development, it should not be impossible, with careful design, to achieve the higher levels of density now sought by PPG3.
22.17 In my view the plan should be stronger on this point, with the addition of a reference to the need that every effort should be made to develop at densities of 30 or more dwellings per hectare. I note the view that there should be a single, specific policy on densities. Each allocated site is ascribed a density level. Criterion C applies to all other proposals for residential development that are likely to come forward. Whilst there is some merit in having a separate policy, on balance I am content that the issue is covered this way. I put forward some suggested rewording to the density criterion.

22.18 I am content that the sentence providing for infilling in washed over villages in the green belt properly reflects the advice in PPG2. I do not, therefore consider it appropriate to expand the categories of development permissible in those villages. Proposed Change 89 meets the concerns expressed by RMC Properties in respect of the definition of infilling.

22.19 I am content with the way the Council indicates on the Proposals Map the H2 legend.

Supporting text

22.20 A consequence of my recommendations on the wording of policy H2 is that some parts of the supporting text will need to be reworded. I leave those details to the council and in so doing refer it to those representations opposed to criterion A who have suggested detailed revisions to parts of the supporting text. Finally, I do not see the need to include the smaller sites, referred to in Appendices 13 and 14, within the policy.

Recommendation

22.21 I recommend that Policy H2 be modified

i) by the deletion of criterion A and the final paragraph of the policy,

ii) by the deletion of criterion C and its replacement by: "The maximum density compatible with the site, its location, its accessibility and its surroundings is achieved. The expectation is that all developments will achieve a minimum density of 30 dwellings per hectare and that higher densities will be achieved where local circumstances permit. Not least, in and around existing town centres and locations well served by public transport, where densities of upwards of 50 dwellings per hectare should be achieved."

iii) by the addition of the following criterion: "Larger greenfield sites within the villages listed in paragraphs 8.114 and 8.115 with the potential to provide a level of development out of scale with the village, and so potentially in conflict with the strategy of the plan, will only be permitted where car dependency will be limited. To this end, the site should be capable of being served by a reasonable level of public transport and the village should offer a reasonable range of facilities and employment opportunities."

iv) in accordance with Proposed Changes PC88 and PC89.

23. Policy H03 and Paragraphs 8.124-8.126 - Residential development in the countryside

Objections

| 52/007 | The Tortworth Estate Company |
| 146/004 | Mr & Mrs D Jenkins |
| 283/069 | Government Office for the South West |
Issues

Should the policy allow for housing within hamlets or small groups of dwellings?

Is the status of settlement boundaries inflexible and unreasonable?

Does it reflect the potential residential contribution from this source?

Does the policy adequately reflect recent national guidance?

Reasoning and Conclusions

23.1 Criterion 4 of policy H3 provides for housing within hamlets and small groups of dwellings, outside the green belt, to meet an identified need. The supporting text, at paragraph 8.124 indicates that in exceptional circumstances limited sensitive infilling in hamlets and small groups of dwellings may be permitted providing there is a clearly identified and genuine local need for housing from people who are or have previously been closely connected with the hamlet or group of dwellings through work or residence or need to continue to work or care for/be looked after by a close family relative.

23.2 In my view this goes well beyond the exceptions allowed for by national guidance. Local affordable housing needs are provided for by policy H7 and agricultural workers by policy H8. The categories covered by criterion 4 extend these to include those with links to isolated groups of dwellings. The areas of need referred to, in the supporting text, imply some sort of preference to be given to local people over others. This is contrary to one of the basic tenets of the planning system that it should work in the public interest, not in the interest of particular groups. The effect of the criterion would also be to undermine the essential thrust of the plan's strategy to achieve a sustainable pattern of development, allowing development in small groups of properties in the countryside, away from the services and facilities provided by villages and towns of the area. Nor do I find the need for elderly persons' accommodation so compelling that an exception should be made to allow such development in rural areas outside settlements. Policy H4 applies to residential institutions and allows for extensions, subject to other relevant policies. I recommend that criterion 4 be deleted.

23.3 The identification of settlement boundaries is a fundamental part of the strategy to direct development to the most sustainable locations, the urban areas and other settlements where employment, services and facilities are concentrated. They are an entirely appropriate way of giving expression to the objectives expressed in PPG3. I see no justification at all in the suggestion from the HBF that the status of these boundaries is somehow inflexible or unreasonable.

23.4 The objection from the Tortworth Estate Company relates more to policy H9 than here. It is concerned that the plan fails to acknowledge the potential contribution to new residential units by conversion. It goes on to suggest that the plan's approach to conversions fails to reflect the changing emphasis in national guidance. The latter point I cover under policy H9. As far as the contribution to the housing supply is concerned, the council includes such contributions in its calculation of the residual requirement. There is a cross reference in paragraph 8.126 to the conversions policy, H9. I see no particular benefit in adding to this.
Recommendation

23.5 I recommend that the local plan be modified by the deletion of criterion 4 and the consequent rewording of paragraph 8.124.

24. Policy H04 and Paragraphs 8.127-8.132 - Development within existing residential curtilages, including extensions and new dwellings

Objections

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<td>H04 8.127-8.132</td>
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Issues

- Does the policy allow for development that could exacerbate parking problems?
- Does the policy work against the aim for sustainable development?

Reasoning and Conclusions

24.1 Marshfield Parish Council is concerned that the policy could lead to the creation of separate dwellings, resulting in turn in the loss of character of old burgage plots and in access and parking problems. The policy provides a number of criteria against which schemes can be judged. Whether schemes would create separate or ancillary accommodation is a matter for judgement on a case by case basis. I see no reason for the plan to define these terms. In my view this policy, together with other policies in the plan, provides a reasonable framework to judge the merits of individual proposals. I understand the concerns expressed in respect of the particular sites within Marshfield. Policy H4 sets out clearly the tests to be applied to any proposals there and it is for the local authority to judge those proposals against the criteria in the individual circumstances of each case.

24.2 The Friends of the Earth are concerned that the criteria, if applied too restrictively, would work against the maximising of density to achieve sustainable development. The policy sets out criteria against which individual proposals will be judged. These are to a large degree subjective matters, involving judgements to be made in respect of such matters as the effect on character, on amenity, and on the adequacy of parking. As an approach this is a reasonable one to adopt. I fully accept the principle that the higher the density of development within existing curtilages, the less greenfield development that will be needed. However, regard must also be had to the individual circumstances of any case and the immediate impact that that would have on the surrounding area. The set of criteria provides a basis for doing this. The policy also needs to be read in the context of criterion C of policy H2, as recommended to be modified, which seeks to achieve the maximum density compatible with its site and surroundings. However, I do not feel that the policy as drafted gives sufficient emphasis to making the most efficient use of sites, through higher densities. Given the overarching aim of achieving the most efficient use of developed land it would be appropriate to add this reference to the policy.

24.3 Criterion A refers to "respecting" massing and scale and so on. This does not mean that schemes should slavishly adhere to what is there. The addition of wording to the effect that the criteria will be applied in the light of the desirability of making best use land would help to ensure that the criterion was not applied too rigidly. Likewise, criteria concerning parking and
private amenity space provision would be set in this context. The council indicates in paragraph 8.129 that Supplementary Planning Guidance will be produced to provide clearer advice as to what is considered adequate. This gets away from setting specific, minimum standards that must be achieved. It will be for the council to make a judgement on individual proposals in the context of the aim of achieving sustainable development how much amenity space or parking, if any, would be needed.

24.4 I am content with the paragraph relating to tandem development. It raises particular problems that are frequently very difficult to overcome. That said, the text does not preclude schemes coming forward.

24.5 Policy H4 applies to residential institutions and allows for extensions, subject to other relevant policies. The concerns expressed by the GOSW regarding private amenity space and extensions to dwellings in the green belt have been taken on board by the revised deposit version of the plan.

Recommendation

24.6 I recommend that the local plan be modified by the addition of the following sentence to the end of the policy.

"In assessing the acceptability of proposals the council will have regard to the desirability of maximising densities to achieve the most efficient and sustainable use of land".

25. Policy H05 and Paragraphs 8.133 - 8.136 - Residential conversions, houses in multiple occupation and re-use of buildings for residential purposes

Objections

146/006 Mr & Mrs D Jenkins H058.33-8.136
274/009 South West RSL Planning Consortium H05

Support

198/013 Marshfield Parish Council H05
431/071 Friends of the Earth H058.135

Issue

Should criterion C apply to conversions by Registered Social landlords?

Reasoning and Conclusions

25.1 What constitutes an acceptable level of parking is a matter of judgement in particular cases. Where properties are owned and managed in such a way that residents would not have cars, then that can be taken into account in deciding whether any parking should be provided. That can be taken into account bearing in mind that parking standards are maxima and the advice in PPG13 regarding levels of provision. I see no need to amend the wording of the policy in this respect.

25.2 The policy is permissive to proposals for residential institutions as sought by Mr and Mrs Jenkins.
Recommendation

25.3 I recommend that no modification be made to the local plan.

26. Policy H06 and Paragraphs 8.137-8.146 – Affordable housing

Objections

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Is it appropriate to consider the further changes proposed by the council?
How large is the scale of housing need in the district?
What should be the percentage target for affordable housing?
What thresholds should apply?
Should consideration be given to the contents and application of the SPG?
Does the wording of the policy and text reflect national guidance?
Reasoning and Conclusions

Procedural matters

26.1 The plan's provisions for affordable housing have been evolving during the course of its preparation and examination. The plan was drawn up in the context of a Housing Needs Survey undertaken in 1998. The first deposit plan provided for an overall target of 1,600 affordable dwellings, with the council negotiating for up to 30% provision on sites above 1 hectare, 0.5 hectares in rural areas. The overall target was dropped from the wording of the policy in the second deposit version of the plan. Subsequently, the council has commissioned a new Housing Needs Study, which was completed in March 2004. As a result of this and other changed circumstances the council has proposed a series of changes, PC195 to 203. These changes are set out comprehensively in the council's Topic Paper TP14. They lower the threshold to 0.5 hectares generally, 0.2 hectares in rural areas. They also increase the target for negotiation to 40% of dwellings. These changes take on board many of the points raised by the original objections.

26.2 These changes have not been formally endorsed by the council, nor have they been subject to public consultation beyond circulation to interested objectors. Nevertheless, I base my considerations on this latest version. I see no purpose would be served by limiting my considerations to the version that is contained in the revised deposit plan. Clearly, it is right to consider the most up-to-date position, not least the very recent Housing Needs Study. Those people who made objection in respect of this subject have had an opportunity to present their views to the inquiry. I do not consider that their interests would be harmed by me considering the latest position. Consideration of this matter now should enable an up-to-date policy to be included within this plan without awaiting a review of the plan or for extended modification procedures.

The extent of housing need

26.3 The Housing Needs Study (HNS) is up-to-date and broadly follows the guidance in the Good Practice Guide. A number of criticisms were made of this study, including concerns about measuring and double-counting of households in need, the lack of discounting of those in need, allowance for re-lets, allowance for out-migration, the time-scale for the erosion of the backlog, the taking into account of Housing Benefit and the private rented sector and so forth. In my view the HNS has been carried out broadly in accord with national guidance. It has adopted a fairly conservative approach to the assessment. I do not find any of the criticisms of such force as to alter its headline conclusions on the high level of need in the district.

26.4 The need identified by the recent HNS is far in excess of any possible contribution from the dwelling supply requirement over the rest of the plan period. Even if many of the individual criticisms made by objectors were correct they would not bring the overall level of need down to approaching the level of provision possible through the operation of this policy. There is, therefore, no advantage in my commenting in more detail on the individual criticisms made. It is clear to me that a realistic policy aimed at delivering affordable housing would still fall some considerable way short of meeting the identified need.

26.5 I note the views expressed about the level of need referred to in the Barker Report and the South West Affordable Housing Needs Study. I do not consider that these figures are directly comparable. I note too the experience in Bristol City. However, as far as this district is concerned I find no compelling reason to conclude other than that the need far surpasses supply and that the council is right, in principle, to seek to provide as much affordable housing as possible. Clearly, there are many assumptions made and the HNS deals, in part at least, with aspirations, rather than more direct evidence of need. Nevertheless, it seems to me to be entirely within government policy to base the desired provision of affordable housing on the
level of need as identified by the HNS exercise. I am entirely supportive of the council’s position that the need is such that it should seek to maximise the delivery of affordable housing in the district.

**Target percentage for negotiation**

26.6 In principle, I accept that all the allocated and windfall sites above a base threshold would be suitable for the provision of affordable housing. I am not aware of any geographical or other reason why any sizeable site should be exempted from this policy. I therefore support a district-wide percentage figure which the council would seek to secure, subject to negotiation. This would be a target figure, not a quota and be subject to a number of considerations.

26.7 The latest version of the policy now sets a 40% figure as a basis for negotiation. That has risen from the 30% originally sought in the second deposit plan and is justified, in the council’s view, by the HNS results. I am fully satisfied that there is a need for that level of affordable housing – I do not accept the view that the plan is wrong to attempt to provide for all those who are unacceptably housed now or in the near future. What then needs to be answered is, what would be a reasonable, practical, viable target for the council to seek in negotiations with developers? In this context the council commissioned a Viability Assessment from Chestertons. This concluded that a 40% provision of affordable housing would be achievable in the district.

26.8 An immediate difficulty with this is that this Assessment was made across the board, to apply to the whole district. Clearly, financial circumstances will vary from site to site as to what level of subsidised housing is viable and at what level the overall viability of a development would be undermined such that development would not proceed. Not least in these variations is the ownership history of a site: whether it has been purchased by developers in advance of this policy requirement being known or whether the drop in land value, arising from the increased affordable housing requirement, can be reflected, in part at least, in a revised purchase price. In addition, of course, site circumstances will vary both physically and in terms of infrastructure and other costs required by planning condition or obligation.

26.9 Given that so much of the housing requirement is to be met by a small number of very large developments it is regrettable that individual viability assessments have not been carried out for these sites in advance of the inquiry as an aid to determining a realistic level of the target to include within the plan. However, an across the board approach is not an insurmountable difficulty in that negotiations on an individual development can take into account the individual circumstances of each project. As well as this including site characteristics and the associated planning requirements, this can include matters such as the availability of public funding, together with other factors such as the nature and type of provision and the aim of creating a sustainable community.

26.10 There are very wide discrepancies between the council's Viability Assessment and that carried out on behalf of objectors. These substantial differences between the parties spread across the projected income, build cost levels and profit levels. I find it is somewhat surprising and disappointing that there are these wide differences as I would have hoped that there were standardised figures, particularly related to build costs and profits that could be applied to exercises such as this. However, that is not the case here. Having examined the alternative approaches and the subsequent joint report on the differences of approach I am left with a position that I do not consider that I can unequivocally rely on the Chesterton figure of a 40% target.

26.11 Also of very real note is the wider question of market conditions. The existing policy of 30% provision was established in a period of rising market conditions. It is unlikely that
market conditions will stay exactly the same over the remaining years of the plan period. The best guess is that in a natural cycle the housing market will experience a degree of a downturn. In my view it is essential to establish a percentage target figure that is realistic. To set a figure that is unrealistic and unachievable could have two consequences. It could lose all credibility, such that it cannot be taken seriously as a starting point for negotiation. The prevailing expectation would then be that a much lower figure would be adopted. In which case, the figure would serve very little purpose. It would not guide the developer, nor assist the council. The other consequence could be that an unrealistic figure would result in a serious slowdown in housing provision. If the council sticks to an unrealistic figure that renders individual schemes unviable, then those schemes will not come forward, with developers holding back their schemes until market circumstances become more favourable, or the policy approach changes. This could threaten the achievement of the housing requirement, which in turn would increase the level of need in the area.

26.12 Rather than set a figure that is unrealistically high, it is better, in my view, to set one that is more robust, one that stands a better chance of achievement, that will not too often be substantially reduced to a much lesser figure. Broadly speaking, I do not find that the criticisms made of the Chesterton approach are compelling. There seems to me to be some double counting of profit in the objectors’ analysis, for example. However, there remain some discrepancies in approach that I do not feel I am able to comment meaningfully upon. I note that the viability exercise is based on a worst case scenario where no public subsidy is included. Nevertheless, the evidence on this issue does not provide wholly convincing argument to establish a 40% target. It would appear to be towards the upper end of viability. The exercise seems to me to be very sensitive to relatively minor variations in assumptions. If assumptions made are wrong a major difficulty could arise of sites simply not coming forward.

26.13 Given some residual doubts as to the extent one should rely on this one study, my concerns about the need to accommodate a varying market, the dangers of establishing an unrealistic and unachievable target and the imperative to maintain a supply of land for development to meet the housing land requirements I come to the view that the figure should not be set above one third of dwellings. In terms of total numbers of provision of affordable housing any reduction arising from the drop in percentage provision will be offset, in part at least, by my recommended increase in the housing land supply. In passing, I note that this figure would also generally more closely reflect the experience of a number of nearby districts, though I do not feel this is in itself particularly significant.

26.14 In setting a target figure for negotiation at 33.3% I am especially mindful that it is a figure to form the starting point for negotiation, that the circumstances of individual sites must be taken into account so that the affordable housing requirement does not prejudice the achievement of the housing proposals. In setting the target figure at this level I have also been mindful that many of the larger housing proposals will have other, substantial requirements. Not least, those sites in and around the North Fringe and at Emersons Green East will have to make major, significant financial contributions towards upgrading the public transport system in their area. This is essential, to give their future occupants a realistic opportunity and encouragement to use public transport, cycle or foot to make a significant number of their journeys.

The application of SPG

26.15 Some strident criticisms were made of the council’s Supplementary Planning Guidance on affordable housing. This is in draft form only, awaiting the outcome of this inquiry. However, objectors complained that it is being applied now and being applied in a very inflexible manner. It is not my role to consider the contents of the SPG. My role is limited to the consideration of objections made to the plan itself. In principle I have no problem with the council leaving the details of how the policy will be implemented to SPG, provided that the policy sets out clearly the basis of the approach. This I believe it does. I cannot comment on
the contents of the SPG and even less so on how the officers are applying it. What I can do is to ensure that the wording of the plan’s policy and the supporting text set out clearly the basis on which negotiations will take place. The weight that can in due course be given to any adopted SPG will depend on the degree to which it has been subject to public scrutiny.

**The level of thresholds**

26.16 The council has lowered the thresholds from 1 hectare to 0.5 hectare, and from 0.5 hectare to 0.2 hectare in rural areas. This it has done because of the higher estimate of need in the district revealed by the recent HNS and the advice in the Consultation Paper on a proposed Change to PPG3, Influencing the size, type and affordability of housing. That document, at paragraph 10 indicates that affordable housing should not be sought on sites less than 0.5 hectares. Although that document is only a consultation paper, it does reflect the determination of the government to secure a meaningful element of affordable housing. Given the level of need identified in the district I am satisfied that the conditions exist to justify the adoption of the lower thresholds now sought by the council. Although not strictly the “exceptional local constraints” required of paragraph 10 of Circular 6/98, I believe that the increased determination to meet housing needs through the provision of affordable housing and the very strong level of need demonstrated within the district combine to justify these lower thresholds. The high level of need in rural areas, that is outside the defined main urban areas, justifies the low thresholds proposed there.

**The wording of the policy and supporting text**

26.17 Proposed Changes PC195 to 203 bring the plan up-to-date. Broadly, I support those changes. However, my conclusions must be reflected in a reduction of the percentage target to 33.3%. That, and the increase in housing land supply, will have a knock-on effect upon the overall numbers that the policy could achieve.

26.18 Paragraph 8.139F indicates that in seeking the maximum level of affordable housing on each site that is feasible, regard will be had to the economic viability of site development, likely costs, existing market conditions and the availability of public subsidy. Clearly, these are important considerations. They are essential components of what is a negotiating process, not an imposition of a fixed requirement. In these circumstances and being mindful of the comments made by objectors about the way in which the policy has been applied to date, I am of the view that this paragraph should have a greater emphasis. To that end it should be highlighted by its inclusion within the wording of the policy itself, rather than being within the supporting text. In listing the matters to which regard will be had, this re-emphasises that the whole process is subject to negotiation between the parties.

26.19 I would add one other factor to this paragraph; the aim of achieving a sustainable community. Certain concentrations or mixes of tenure types and unit sizes may not assist in the achievement of stable, balanced, sustainable communities and this should be a factor in determining the level and precise mix of types of tenure. This would be even more relevant were the percentage of affordable housing to rise to levels beyond this.

26.20 In terms of tenure considerations, paragraph 8.138A acknowledges the government’s definition of affordable housing. Paragraph 8.139C reports, factually, that the HNS does not include unsubsidised low cost market housing. Paragraph 8.141A indicates that the policy does not prescribe the type of affordable housing by tenure. This is important where the level and type of public subsidy may substantially vary. It goes on to say that in practice provision will cover a range of tenures, including "near-market" rents and discounted home-ownership. The figures available suggest that undiscounted, low-cost market housing is still substantially adrift from being affordable for those found by the HNS to be in need, albeit this form of housing has its part to play in meeting wider housing needs in the district. The policy is aimed at those who cannot normally afford to rent or buy on the open market, ie those who need
some form of subsidy or help. In these circumstances I am content that the policy refers to “subsidised” affordable housing. In my view the policy, and its supporting text, both reflect national guidance in not being tenure specific and the individual circumstances found within the district.

26.21 I am content that the policy provides for the long term reservation of dwellings to meet affordable housing needs. This accords with national guidance in the Circular. I am also content with the concerns expressed in the text about provision within small clusters and that alternative provision off-site should be a last resort.

Recommendation

26.22 I recommend that the local plan be modified in accordance with PCs 195 to 203, subject to:

i) a 33.3 % affordable housing target,

ii) the inclusion of paragraph 8.139F within the wording of the policy itself,

iii) the addition of a reference within that wording to the aim of achieving balanced and sustainable communities.

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27. Policy H07 and Paragraphs 8.147-8.155 - Affordable housing – Rural exception schemes

Objections

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<td>203/034</td>
<td>Frampton Cotterell Parish Council</td>
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<td>220/027</td>
<td>The Countryside Agency</td>
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<tr>
<td>288/025</td>
<td>Department for Environment, Food &amp; Rural Affairs</td>
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<tr>
<td>431/073</td>
<td>Friends of the Earth</td>
</tr>
</tbody>
</table>

Issues

Should the policy allow for exception sites in the green belt?

Is it necessary to remove permitted development rights to retain additional control over affordability?

Should the plan include some flexibility where housing remains unallocated?

Reasoning and Conclusions

27.1 Paragraph 5 of Annex B of PPG3 indicates that the exceptional release of land for low cost housing does not alter the general presumption against inappropriate development in the green belt. It goes on to say that the exceptions policy is not intended to apply in most green belt areas, which are by their nature close to the main conurbations. It does, however, go on to say that exceptionally very limited development of affordable housing within or adjoining existing villages or other small settlements may be acceptable and consistent with the function
of the green belt. Policy H7 allows for affordable housing within the green belt only within the boundaries of settlements washed over by the green belt.

27.2 In my view this does not go quite far enough to reflect national guidance in the context of the strong need for affordable housing within the district. It is important that every effort is made to provide for as much affordable housing as possible. There is likely to be a requirement for affordable housing in most rural, green belt areas. Although none of the green belt settlements are that remote from larger urban areas, those areas may be less well placed geographically to meet local affordable housing needs. In these circumstances it is important to be as supportive as possible and to not rule out the possibility of small scale developments adjoining green belt settlements. I propose some revised wording to better reflect the guidance in PPG3.

27.3 The reference to the possible removal of permitted development rights in paragraph 8.154 allows the council to consider whether to assume some control over works that may have an effect on the affordability of dwellings. It does not rule out future extensions. I am content with this approach.

27.4 South West RSL Planning Consortium suggests that the plan should allow for some flexibility in the eligibility criteria, so that if housing remains unallocated after a specified time, then the criteria could be widened to include a wider area. This seems to me to be a sensible suggestion and I recommend accordingly.

27.5 My recommendation to delete criterion A of policy H2 avoids any possible conflict between that policy and this one as regards development within settlement boundaries. Changes made at draft revised deposit stage meet a number of the other concerns expressed by the objectors.

Recommendation

27.6 I recommend that the local plan be modified by:

i) the deletion of the second sentence of the policy and its replacement by: "Such schemes will not be permitted on sites within the green belt except on sites within or adjoining those existing villages or small settlements with defined settlement boundaries, where the scheme is small scale, where it would meet an identified need that cannot be met outside the green belt and where it would be consistent with the function of the green belt"

ii) the inclusion within the supporting text of wording to reflect the need for flexibility in the occupancy criteria to allow for eligibility to be widened when housing remains unallocated.

28. Policy H08 and H08A and Paragraphs 8.159 - Agricultural/Forestry workers dwellings in the countryside

Objection

40/017 Country Landowners Association H08

Support

198/015 Marshfield Parish Council H08
203/035 Frampton Cotterell Parish Council H08 8.159
316/513 National Farmers Union H08(A)
South Gloucestershire Local Plan - Inspector’s Report

Chapter 8 - Housing

431/074  Friends of the Earth  

H08

Issue

Is the plan clear on long-term viability?

Reasoning and Conclusions

28.1 The objection made by the CLA has been met by the changes made by the council at draft revised deposit stage. Those changes accord with national guidance and I recommend accordingly.

Recommendation

28.2 I recommend that no modification be made to the local plan.

29. Policy H09 and Paragraphs 8.164-8.167 - Conversion and re-use of rural buildings for residential purposes

Objections

<table>
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<td>40/018</td>
<td>Country Landowners Association</td>
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<td>146/007</td>
<td>Mr &amp; Mrs D Jenkins</td>
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<td>283/084</td>
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<td>294/004</td>
<td>British Telecom Plc</td>
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<td>294/005</td>
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<td>385/001</td>
<td>Aaron Evans Associates Ltd</td>
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<td>411/002</td>
<td>Derrick Hardwick Building Surveyors and Consultants</td>
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<td>456/001</td>
<td>Owners of Mount Pleasant Farm, Longwell Green</td>
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Support

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<td>431/075</td>
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Issues

Should the policy rule out remote buildings?

Is it right to give priority to re-use for employment?

Reasoning and Conclusions

29.1 The Revised Deposit Draft clarifies how it will be determined that a building is well related to an existing settlement. This meets the objection made by the GOSW.

29.2 PPS7 is supportive of the re-use of appropriately located buildings in the countryside, where this would meet sustainability objectives. In this context it is clear that the re-use of buildings that are isolated and remote from supporting facilities and services are to be discouraged. In the interests of sustainable development and the protection of the character of the more remote areas of open countryside, I am quite content with criterion E, along with the extended explanation of how that will be assessed. I do not consider that residential accommodation for the elderly is so pressing as to warrant overriding the strong planning reasons for seeking to tightly control development in the rural areas outside the towns and villages of the district.
29.3  Criterion A, giving priority to business re-use over residential use, reflects the advice in paragraph 17 of PPS7. The rural areas of the district are all within commuting distance of Bristol and the other urban areas. The evidence points to considerable levels of out commuting from these rural areas, in particular to the North Fringe and Bristol City Centre. In these circumstances it is right to give priority to strengthening the rural economy by encouraging employment re-use of rural buildings, rather than residential re-use which is likely to add to out commuting from those areas. I accept that there are some rural parts of the district that have major employment sites. However, this does not materially detract from the broad picture and does not justify a different approach. The policy and revised text in the Revised Deposit plan gives sufficient information as to how the policy in this respect will operate.

29.4  PPS7 indicates those circumstances where residential conversions should be supported. I accept that it takes a less restrictive approach to residential conversions than PPG7. However, it is still supportive of conversions to business use. The circumstances where residential conversions are to be supported are fairly tightly prescribed. The local plan policy does not rule out residential re-use and goes on, in the supporting text to refer to situations where residential uses may be appropriate. I do not consider that any revision of the policy or supporting text would be justified on this basis. The guidance in PPG3 in relation to preferences for the re-use of employment land for residential purposes and the proposed replacement of paragraph 42 is essentially aimed at making better use of land that has been allocated but not taken up, for employment purposes. I do not consider it adds particular weight to the question of the relative merits of conversions for business or housing use. Nor do I consider that the JRSP policies lead to a different approach to that contained within the local plan.

Recommendation

29.5  I recommend that no modification be made to the local plan.

30.  Policy H11 and Paragraphs 8.174-8.175 - Sites for Gypsies

Objections

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<td>Joint Parishes Consultative Committee</td>
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<td>Yate Sodbury Liberal Democrats</td>
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<td>182/049</td>
<td>Yate Town Council</td>
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<tr>
<td>218/001</td>
<td>Avon Travellers Support Group</td>
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Issues

Is the policy based upon a proper assessment of need?
Should the plan allocate specific sites?
Does the criteria based policy provide sufficient guidance for those wishing to establish their own sites?

Reasoning and Conclusions

30.1  The establishment of the level and nature of the need for sites is not an exact science. The council has undertaken a questionnaire survey of families in the area. This shows a
substantial level of unmet need. In addition there is information available from the bi-annual count and the monitoring of the situation on authorised and unauthorised sites in the district. On the evidence available at the current time it is not possible to establish with any degree of precision the nature and level of need for sites. It appears to me that the questionnaire survey omits various groups in need and so materially underestimates the scale of the overall need. The council will have to undertake further research both to establish the broad level of need and to provide a more sophisticated breakdown of that need into the requirements for public and private, permanent and transit sites.

30.2 Whilst it cannot be quantified at the present time, there is no doubt from the evidence available that there is a substantial and unmet need for sites in the district. The formulation of an approach to meeting the need is not dependent upon a precise definition of that need. A more precise identification of the level and nature of the need is something that the council will need to consider as soon as practical. This would provide the basis for policies which would seek to meet the objectives set out in PPG3, to meet the housing needs of the whole community.

30.3 Circular 1/94 indicates that local plans should wherever possible identify locations suitable for Gypsy sites. It goes on to say that where this is not possible they should set out clear, realistic criteria for suitable locations as a basis for site provision policies. Policy 37 of the JRSP, relating to gypsy site provision, has been successfully challenged in the High Court. It is not envisaged, with the transition to the new development plan system, that this will be replaced in the near future by a new policy. The EiP Panel had earlier concluded that criteria-based policies have failed to meet the housing needs of Gypsies in the former Avon area. Accordingly, the Panel recommended that a policy be inserted in the JRSP requiring local plans to identify suitable locations for Gypsy and traveller sites.

30.4 The fact that policy 37 has been quashed does not mean that a revised JRSP policy would necessarily follow the Panel's recommendation in this respect. It could have been the case that with improved reasoning and justification that a policy similar to policy 37 could have been adopted. I do not, therefore, take the quashing of policy 37 as meaning that the strategic guidance requires the identification of specific sites. Nevertheless, it is clear that criteria-based policies have largely failed to meet the housing needs of Gypsies. Provision has frequently been determined via the appeal process. That is unsatisfactory for everyone. Unless there are strong reasons against doing so, the local plan should seek to establish locations and sites where Gypsies can settle.

30.5 In terms of site identification, the council relies heavily on the 1991 Sites Study and updated work on it. Whilst this process led to the identification of a second council owned site at Winterbourne, in addition to the one at Patchway, it has failed to identify sites suitable for private pitches. All those potential sites that have come forward in studies have been rejected by the council. This is an unsatisfactory situation. I note that the council has over recent years disposed of significant amounts of land. The identification and allocation of land that is being disposed of, as being suitable for Gypsies, could enable any further disposals to contribute to a reduction in the shortage of sites. I have heard evidence concerning the site known as the "Road to Nowhere", Yate. I am not wholly convinced by the arguments advanced by the council as to why this site should not be allocated as a Gypsy site. Having visited the area, I am of the view that this area may offer some potential for a site. However, I am not in possession of all the necessary evidence to come to any firm view on the overall suitability of this site. In these circumstances I invite the council to look again at that site to determine whether all or a part of it might be allocated within this plan.

30.6 It is unrealistic to expect the council to be able to identify other specific sites such that they could be incorporated within this plan. The timescale is too short. Whilst I believe that the adoption of this local plan should not be delayed by further work on this matter, I do consider that the council should, as part of its preparation of its LDF urgently review the
position and introduce a more specific spatial dimension to its approach. This could be by way of the identification of certain general areas within which new sites would be acceptable, or, more preferably, specific sites for allocation in the new LDF. This work should identify the types of provision to be made, local authority, private, permanent, temporary or transitory that are needed and the priority to be given to each.

30.7 Given this delay in identifying specific sites, it becomes even more important that the criteria-based policy provides clear, robust and positive guidance. It has been a criticism of the council’s approach that guidance has been vague and so flexible as to be, in practice, quite unhelpful. The more general the criteria, the more they are open to different interpretations. This does not help those seeking sites and provides the opportunity for political and local pressures to override the positive intentions of the policy. Recent history in the district appears to bear this out. It is important that clear criteria are set out which provide some degree of certainty.

30.8 The local plan contains policy H11 which provides a positive slant in that proposals will be permitted, subject to certain criteria. I agree with that part of the policy that Gypsy sites should not be considered to be appropriate in the green belt and the Cotswolds AONB. That follows national guidance, subject only to the deletion of the word "normally" which adds nothing to the meaning. Whilst much of the district lies within these areas, there are substantial parts that lie outside these. None of the district is so remote form the urban areas as to render them unsuitable for Gypsy sites. There is, therefore, the opportunity in those parts of the district outside the green belt and AONB to accommodate Gypsy sites. This is referred to in passing in the supporting text, at paragraph 8.177. To provide more force and support the positive nature of the policy, this should be incorporated within the body of the policy itself. I recommend some revised wording to that effect. In passing I would comment that the work that the council will need to do as part of the preparation of the new LDF should make clear whether the mismatch between needs and the availability of sites outside the green belt constitutes exceptional circumstances to justify the removal of potential sites from the green belt.

30.9 As regards criterion A, I am not wholly convinced that this is necessary in this policy. The plan needs to be read as a whole. The same could be said for criteria B to D which largely repeat matters contained in earlier chapters, especially chapter 4. On balance, I am content that they remain in the policy, providing a checklist of matters that need to be considered. Whilst the matters raised in these criteria can always be open to different interpretations these are subjective considerations and it is not possible to be more specific. As regards criterion E, the text indicates that this would not in itself be a reason to refuse planning permission. I propose some revised wording to better reflect this point and to draw attention to the most important of the local services and facilities in question.

30.10 The way in which unauthorised roadside encampments are dealt with by the council, as raised by a number of objectors, is a matter for the council to consider outside the scope of this local plan.

Recommendation

30.11 I recommend that the local plan be modified by

i) the deletion of the first sentence and its replacement by: "Proposals for the use of land for the stationing of residential caravans occupied by Gypsies will be permitted in those parts of the district outside the green belt and the Cotswolds AONB, provided that:-"
ii) the deletion of criterion E and its replacement, as a separate part of the policy, by: "Peferably sites should be within a reasonable distance of local services and facilities such as shops, doctors' surgeries and primary schools, though more remote sites will be acceptable."

iii) the deletion of the word "Normally" from the sentence regarding green belts and the AONB.

I also recommend that the council give further consideration to the suitability of land at "the Road to Nowhere" site at Yate for use as a Gypsy site and its possible inclusion in the local plan as an allocation site for use by Gypsies.

I also recommend that the council undertakes both a comprehensive assessment of need for Gypsy sites and a study to identify specific sites, with a view to this informing a site-specific approach to be included within the LDF which will replace this local plan.

31. Policy H12 - Sites for Travelling Showpeople

Objection

283/087 Government Office for the South West H12

Support

431/079 Friends of the Earth H12

Issue

The appropriateness of sites in the green belt

Reasoning and Conclusions

31.1 The concerns of the objector have been met by the Revised Deposit version of the plan.

Recommendation

31.2 I recommend that no modification be made to the local plan.

32. Chapter 8 - Appendices 13 & 14

Objections

13/001 Mr C J Simpson H01 Appendix 13
25/001 Barratt Homes Ltd, Taywood Homes Holdings Ltd & Ashfield Land Ltd H01 Appendix 14
82/001 Secretary of State for Health C/O Capitec H01 Appendices 13 and 14
82/002 Secretary of State for Health C/O Capitec H01 Appendix 14
132/005 St Michaels Parish Church H01 Appendix 13
343/029 Hallam Land Management Ltd H01 Appendices 13 and 14
359/001 Mr D M Boom H01 Appendix 13
408/509 P & A Bennett H01 Appendix 13
408/510 P & A Bennett H01(A)
409/509 North East Thornbury Consortium H01 Appendix 13
409/510 North East Thornbury Consortium H01(A)
410/531 Environment Agency H01(A)
435/035 Bristol City Council H01 Appendices 13 and 14
Issues

The Appendices should be kept up-to-date

Whether the sites should be shown on the Proposals Maps

Reasoning and Conclusions

32.1 Clearly, these Appendices, listing Sites with planning permission and Sites subject of a council resolution to approve, should be updated as far as is practical. The function of these Appendices is to provide support for policy H1, sites for residential development, by listing sites in these two categories. I see no compelling reason for these sites to be shown on the Proposals Maps, particularly as many of them are likely to be developed early in the remaining plan period.

32.2 Other objections listed here relating to the promotion of specific sites are considered elsewhere in my report.

Recommendation

32.3 I recommend that the local plan be modified by the updating of these Appendices to show the latest situation.
CHAPTER 8a - OMISSION SITES AND SETTLEMENT BOUNDARIES

1. Almondsbury - Land Bounded by M4, M5 A38

Objections

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<tr>
<td>290/002</td>
<td>Almondsbury Securities</td>
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<td>290/003</td>
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This site is considered in chapter 5 of my report, under item 3.

2. Alveston - Old Down Road

Objection

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<td>176/001</td>
<td>Naishcombe House Developers Ltd</td>
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Issue

Should this land be included within the settlement boundary?

Reasoning and conclusions

2.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Alveston is a large village well served by local facilities. Thornbury is not far away. It is served by buses into Thornbury and Bristol. In that sense it is a more sustainable location than many of the smaller, more remote villages. However, the plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries.

2.2 The structure plan requirements for the district can be met without the need to allocate housing land within village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Alveston. There still remains the opportunity for incremental, organic growth. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

2.3 Alveston is washed over by the green belt, thus only limited infilling within the settlement is now appropriate both to protect the character of the village and to accord with the purposes of the green belt. Although the objection site is not visible from nearby public areas, it contributes to the general openness of the area. Glimpses from Down Road and partial views across from Old Gloucester Road are possible of the space to the rear of the existing properties, with trees visible. The lack of development of the site would contribute to the openness of this area behind the frontage. To allow development to extend beyond existing boundaries would encroach into the countryside and could diminish the openness of the green belt.

2.4 Having regard to all these matters I do not consider that there is any sound reason to extend the settlement boundary of this washed-over green belt village, permitting additional built development on land that is currently undeveloped.
Recommendation

2.5 I recommend that no modification be made to the local plan.

3. Alveston - Vattingstone Lane/Strode Common

Objections

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<td>Mr J F B Gunnery</td>
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This site is considered in chapter 5 of my report, under item 4.

4. Bridgeyate - Bath Road

Objections

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This site is considered in chapter 5 of my report, under item 5.

5. Bridgeyate - Church Avenue/Bath Road

Objection

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<td>343/012</td>
<td>Hallam Land Management Ltd</td>
<td>H01</td>
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This site is currently under construction to provide housing. No further action is needed on this objection.

Recommendation

5.1 I recommend that no modification be made to the local plan.

6. Bromley Heath - Griffin Farm

Objections

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<td>Mrs Churchill</td>
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<td>Mrs H Bailey-Scudamore</td>
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This site is considered in chapter 5 of my report, under item 6.

7. Bromley Heath - Old Bromley Heath Road

Objection

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This site is considered in chapter 5 of my report, under item 7
8. Charfield - Charfield Hill

Objection

478/001 Mr M Adams H02 (Settlement Boundary)

This objection, seeking a minor correction to the settlement boundary, has been met by the revised deposit plan.

Recommendation

8.1 I recommend that no modification be made to the local plan.

9. Charfield - Land North East of Station Road

Objection

291/005 Wilcon Homes Western H01 (Omission Site)

Issue

Should this site be allocated for residential development?

Reasoning and conclusions

9.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Charfield is a large village. The nearest town is Wotton-under-Edge. Otherwise, the village is relatively remote from the main urban areas. It is quite well served by local facilities and in and near the village are a number of significant employment opportunities. Most notably, the village sits on the main railway line. I comment more fully on this in item 13 below.

9.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Charfield. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

9.3 This site extends to 11.5 hectares, which, at PPG3 densities would be expected to accommodate upwards of 350 dwellings, a sizeable number out of scale with the size of the village and quite unjustified by strategic considerations. Whilst I acknowledge that not all the site may be physically suitable for development, this still represents a considerable development. It would extend the village eastwards down towards the river and would constitute, and be seen as, a major incursion into the countryside setting of the village.

9.4 For all these reasons I do not support the allocation of this site.

Recommendation

9.5 I recommend that no modification be made to the local plan.
10. Charfield - Land North of Wotton Road

Objections

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<td>Swan Hill Homes Ltd</td>
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Issue

Should this site be included within the settlement boundary and allocated for housing development?

Reasoning and conclusions

10.1 I have concluded in the previous item that Charfield is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to enlarge the settlement boundary, nor to allocate additional housing sites. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

10.2 Here the objectors are seeking a substantial change to that boundary, with the allocation of the land for housing. This site is a large one, on the north side of Wotton Road. It lies between the school to the west and Warner’s Court to the east. The current settlement boundary at this point runs along the main road and excludes this site and the development on either side. This reflects the more open nature found on the north side of the road. The objection site forms a very important element of the open gap between development on this side of the road. Notwithstanding the frontage hedge, it allows views to the countryside beyond and thus makes a significant contribution to the attractive countryside setting to the village. I do not consider that the land would fall naturally within an extended village boundary. Whilst it lies close to the heart of the village, its nature owes more to the countryside setting on this side of the road than to the more urban feel of the heart of the village. Its inclusion would not round off the village, but, rather, would constitute a major incursion into the open setting of the village.

10.3 For all these reasons I do not support the allocation of this site. Nor do I support the suggestion that it might be identified as a reserve site for future development. Decisions on the future pattern of development post 2011 can best be made by the successor to this plan.

Recommendation

10.4 I recommend that no modification be made to the local plan.

11. Charfield - Station Road

Objection

<table>
<thead>
<tr>
<th>Objection Number</th>
<th>Developer</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>441/022</td>
<td>Redrow Homes (South West) Ltd</td>
<td>H01 (Omission Site)</td>
</tr>
</tbody>
</table>

Issue

Should this commercial site be allocated for housing?
Reasoning and conclusions

11.1 This site is currently occupied by commercial development, MJ Fews and Co, a motor car dealership. It is identified under policy E3 (29) as being an employment area where loss of employment land will be subject to a number of restrictive criteria. The future of this site is, in part at least, linked to the objection, made by the same objectors, seeking the development of land at the eastern edge of the village, at Charfield Green. That proposal included some commercial development that could provide for the relocation of the dealership from this site. In item 13 below I have not supported the development of that latter site, so the question of relocation there does not arise.

11.2 As regards the housing use of this employment site, I have no firm evidence before me about the future intentions of the current occupiers. If they move, there is no reason why the site could not continue in employment use. Certainly, I have no convincing evidence before me that the employment status of the land should be rescinded. It provides a valuable source of local employment and is suitable to continue to do so. I am aware of other employment opportunities outside the village, but this does not mean that there is not a need for existing, well located employment sites such as this to be retained for that purpose.

11.3 I have concluded in item 9 above, and in chapter 2 of my report, that Charfield is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to provide for additional housing sites within the village. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district. Policy E3 provides the basis for the consideration of any specific proposal that would involve the loss of employment sites such as this. Given these conclusions I do not support the allocation of this site for housing.

Recommendation

11.4 I recommend that no modification be made to the local plan.

12. Charfield - Wotton Road

Objections

<table>
<thead>
<tr>
<th>Objection</th>
<th>Name</th>
<th>Description</th>
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</thead>
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<tr>
<td>405/005</td>
<td>Mrs Ratcliffe, Messrs Baker, King &amp; Smith</td>
<td>H02 (Settlement Boundary)</td>
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<td>405/007</td>
<td>Mrs Ratcliffe, Messrs Baker, King &amp; Smith</td>
<td>H01 (Omission Site)8.13-8.30</td>
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Issue

Should this land be included within the settlement boundary and allocated for housing?

Reasoning and conclusions

12.1 I have concluded in item 9 above that Charfield is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to enlarge the settlement boundary, nor to allocate additional housing sites. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.
12.2 Here the objectors are seeking a very substantial change to that boundary, with the allocation of the land for housing. This site is a large one. It lies well beyond the existing confines of the village, on high ground well above the village. The current existing village lies well separated from this site by the scarp face. I do not consider that the land can be said in any way to fall naturally within an extended village. It is an area of countryside remote from the main built-up area of the village. Its inclusion within the village would be entirely inappropriate. Any residential development here would represent a major, isolated incursion into open countryside to the detriment of the wider countryside setting of the village.

12.3 For all these reasons I do not support the inclusion of this site within the village nor its allocation for housing.

Recommendation

12.4 I recommend that no modification be made to the local plan.

13. Charfield - Wotton Road - Redrow Homes (South West) Ltd

Objections

<table>
<thead>
<tr>
<th>Objection</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>441/012</td>
<td>Redrow Homes (South West) Ltd H01 (Omission Site)</td>
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<tr>
<td>441/015</td>
<td>Redrow Homes (South West) Ltd H02 (Settlement Boundary)</td>
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Issue

Should this site be included within the settlement boundary and allocated for housing and a small area of employment?

Reasoning and conclusions

13.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages. If there were a need to go beyond the Bristol conurbation, then both Yate and Thornbury would be preferred locations over the villages. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

13.2 The objectors are seeking the allocation of 6.3 hectares of land at the eastern end of the village for 100 dwellings, with ancillary uses and about 0.25 hectares of employment land, with the balance, about 3 hectares, being in the floodplain or intended for landscaping. The employment area could provide for the relocation of the Fews motor car dealership from the Station Road site or for other employment uses. Charfield is a large village. It is the largest settlement in this part of the district. The nearest town is Wotton-under-Edge. Otherwise, the village is relatively remote from the main urban areas. It is well served by local facilities and in and near the village are a number of significant employment opportunities and a secondary school. Most notably, the village sits astride the main line railway line.
13.3 In terms of the PPG3 sequential approach, there was some debate at the inquiry as to whether the village could be construed to constitute a "node in a good transport corridor". This very much depends upon the re-opening of the station. There appear to be a number of issues, including funding and operational constraints, that must be addressed and satisfied before the re-opening could be assured. Whilst the council has a degree of confidence that the station can be re-opened, the decision effectively rests with others. Even with the re-opened station this would give only a very limited service for local people. The number of trains that would be able to stop here is limited, including possibly only one peak hour train. Estimates suggest only a very small modal shift to train use would be achieved.

13.4 Without the achievement of the re-opening of the station it is not realistic to treat the village as a node in a good public transport corridor. In my opinion there must be considerable uncertainty as to whether a re-opening can be achieved within the plan period. Even if it does, I am not persuaded that this would bring the village within the scope of paragraph 30 of PPG3. Projections of the numbers of new passengers suggest that the strong reliance on the car would only be marginally affected. The village is served by a number of buses serving Wotton-under-Edge, Yate, Thornbury and Cribbs Causeway, Dursley and Bristol City Centre. Whilst these give access to a wide range of places, the frequency and travel times tend towards or go beyond the standards suggested in RPG10.

13.5 In my view it would be inappropriate to consider treating the village as being a node in a good public transport corridor until such time as there was certainty as to the re-opening of the station. Even with that, I am far from persuaded that this would lift the village into that category. Whilst the village is clearly considerably more sustainable as a location than many of the other villages in the district, I do not believe that the standard of service of stopping trains and that of buses serving the village would be so good as to justify the elevation of the village to the third category of PPG3 paragraph 30. Most residents would continue to be dependent upon the car in order to meet their needs. In this respect I acknowledge that facilities within the village would be in reasonably good proximity of the site. However, walking and cycling access to employment areas outside the village and to the secondary school are not good. Although employment provision may well increase in the area, this would help to redress the imbalance in the area. It is not a reason to provide significant amounts of new housing. Nor do I consider that there is such a pressing need for employment as to justify the provision of an employment site here.

13.6 I find nothing in regional or strategic guidance as to override my conclusions as to the locational spread of development. The needs of the whole area are not being ignored – policies provide for some incremental growth. Neither policy SS2 or SS19 of the RPG provide justification for a development of 100 dwellings in this village location. I do not consider that such a development could be considered as being small scale. Likewise, whilst the proposal meets a number of the points in policy 2(d) of the JRSP, this policy needs to be read in the round. In my view the circumstances of the village are not such as to warrant an allocation being made.

13.7 The proposal involves the eastward extension onto mostly open, undeveloped land. This land provides an open gap between the commercial buildings east of the river and the start of the village. Development here would reduce the contribution made by the open character of the river valley, though the protection of the floodplain could help to reduce the impact. I do not find the site specific considerations in themselves raising compelling objection to the proposals. If development were required around the village then I would expect this site to be one of those that would be considered. However, I do not consider that these proposals are in accord with the plan's strategy and I do not, therefore, support the addition of this site to the plan's allocations.
Recommendation

13.8 I recommend that no modification be made to the local plan.

14. Charfield - Wotton Road - Crest Nicholson

Objections

<table>
<thead>
<tr>
<th>Objection</th>
<th>Company Name</th>
<th>H01 (Omission Site)</th>
<th>H02 (Settlement Boundary)</th>
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</thead>
<tbody>
<tr>
<td>285/008</td>
<td>Crest Nicholson Residential (South West) Ltd</td>
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<tr>
<td>285/009</td>
<td>Crest Nicholson Residential (South West) Ltd</td>
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</tr>
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</table>

Issue

Should this land be included within the settlement boundary and allocated for housing?

Reasoning and conclusions

14.1 I have concluded in item 9 above that Charfield is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to enlarge the settlement boundary, nor to allocate additional housing sites. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

14.2 Here the objectors are seeking a very substantial change to that boundary, with the allocation of this land for housing. This site is a large one. It comprises land, to the west of the village, that includes the steeply sloping ground of the scarp face. The rising ground here is particularly prominent and any development here would have a substantial impact on views into and out of the village. New housing here would be especially prominent and would seriously erode this attractive setting of the village. I do not consider that the land can be said in any way to fall naturally within an extended village. Rather, it is an area of countryside that forms an important backdrop to the village, one that should be retained. In my view its inclusion with the village would be entirely inappropriate. Any residential development here would represent a major, harmful extension of the village to the detriment of the wider countryside setting of the village.

14.3 For all these reasons I do not support the inclusion of this site within the village nor its allocation for housing.

Recommendation

14.4 I recommend that no modification be made to the local plan.

15. Chipping Sodbury - East of St Johns Way

Objection

<table>
<thead>
<tr>
<th>Objection</th>
<th>Company Name</th>
<th>H02 (Settlement Boundary)</th>
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</thead>
<tbody>
<tr>
<td>139/004</td>
<td>Hannick Homes &amp; Developments Ltd</td>
<td></td>
</tr>
</tbody>
</table>

Issue

Should this land be included within the settlement boundary?
Reasoning and conclusions

15.1 In my conclusions on the locational strategy of the plan, in chapter 2 of my report, I do not support the allocation of land for development in Yate/Chipping Sodbury. This objection site comprises a very extensive expanse of land to the east of the town, which at PPG3 density standards could accommodate upwards of 2,000 dwellings. I have absolutely no doubt that such a large expansion of Yate/Chipping Sodbury is unjustified in the context of this plan. The next round of plans will look at the most sustainable options for development post 2011 in the district and no doubt the future of Yate/Chipping Sodbury will form part of that debate. As far as this plan is concerned I can see no reason to support the inclusion of this land within the settlement boundary. It is set outside the clearly defined existing limits and forms part of the countryside setting of the town. Unless there is shown to be a strategic need, then that position should be maintained.

Recommendation

15.2 I recommend that no modification be made to the local plan.

16. Coalpit Heath - Hartwells Garage, Badminton Road

Objection

343/013  Hallam Land Management Ltd  H01 (Omission Site)

Since this objection was made the site has been developed for housing. No action is needed in respect of the local plan.

17. Cribbs Causeway - Land Adjacent to the Lamb and Flag

Objection

398/004  East Lake Developments Ltd  H01 (Omission Site)

Issue

Should this site be removed from the green belt and allocated for a mix of uses, such as leisure, hotel, restaurant, car showroom, offices or residential?

Reasoning and conclusions

17.1 This 0.4 hectare site lies within the green belt. On the east side of the A4018 Cribbs Causeway lies extensive commercial development. In contrast, the west side of the wedge of land between the A4018 and the M5 all lies within the green belt. For the most part this wedge of green belt is open in character and appearance, although there are a number of properties dotted along the main road. The objection site lies immediately to the north east of the Public House, which has a large hotel block to the rear. It contains a number of properties both fronting the main road and set back within larger plots. The area to the north east, the thin end of the wedge, is overgrown.

17.2 In all, the land lying on the north west side of the main road is predominantly open in character. In my view it is entirely appropriately to draw the boundary of the green belt along the A4018, rather than the motorway and so include this land, including the objection site, within the green belt. The established green belt boundary along this line has resulted in the very distinct difference in character and appearance between the land on either side. The fact of having a major commercial area immediately to the east does not seem to me to
give reason to draw back the green belt boundary on the west side of the road. Nor does the presence of some buildings on the objection site justify the removal of the area from the green belt with the potential development of the site. The council's housing requirement can be met without taking green belt land and I am not aware of any need to do likewise in respect of the commercial needs of the area.

17.3 In conclusion, I consider the objection performs a green belt purpose and I find no exceptional circumstances that might justify altering the green belt boundary in this area.

**Recommendation**

17.4 I recommend that no modification be made to the local plan.

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### 18. Cromhall - Heath End

**Objection**

143/004 The James Family H02 (Settlement Boundary)

**Issues**

- Should a settlement boundary be established for Heath End?
- Should this include the agricultural land to the east?

**Reasoning and conclusions**

18.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Heath End is a small hamlet of dispersed and sporadic character associated with a B road in otherwise open countryside. It lacks its own local services. It is a relatively isolated hamlet with occupants of new housing here likely to be very reliant upon the private car, having to travel to Thornbury or further afield for almost all of their daily needs.

18.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within unsustainable countryside locations such as here. I do not consider that the support given to rural settlements in PPS7 or elsewhere justifies the establishment of a settlement boundary round this small group of rural properties. New development here would be isolated and remote from supporting services and facilities and would represent a highly unsustainable option.

18.3 Whilst any infill development within small groups of houses in the countryside would fall to be considered on their merits in the context of the local plan policies, the inclusion of an area of greenfield land within a settlement boundary here, opening up the potential for a housing development, would fly in the face of the underlying strategy of the plan.

**Recommendation**

18.4 I recommend that no modification be made to the local plan.
19. Cromhall - Land North of Cromhall

Objection
52/005 The Tortworth Estate Company H02 (Settlement Boundary)

Issue
Should this site be included within the settlement boundary?

Reasoning and conclusions
19.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Cromhall is a small village with a very limited range of local services. There is only a modest level of bus service providing limited connections to the main urban areas. It is a relatively isolated village with occupants of new housing here likely to be very reliant upon the private car, having to travel to Thornbury, or Yate, or further afield for almost all of their daily needs.

19.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need, strategically, either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Cromhall.

19.3 That said, I consider that there are site specific reasons for changing the settlement boundary here. This site is a very small one and is built up in character, with a derelict farm cottage and redundant farm buildings enclosed around a courtyard. The settlement boundary includes part of the site, but excludes the balance. In my opinion there are very strong visual reasons for including the whole of this site within the village boundary. The site is very prominent in views from the north, as one makes the long, open approach from Charfield. The existing buildings on the site provide a very clear and very sharp visual edge to the village. In my view there is no logic to including only the most southerly part within the settlement boundary.

19.4 I accept that this might be a difficult site to bring back into productive use on account of the change in levels and the difficulty of achieving an acceptable and safe access. I accept, too, that there is scope for some minor windfall development elsewhere in the village. However, this is a site that has the character and appearance of being developed, with prominent structures on it. In my opinion the inclusion of this site within the settlement boundary would offer the best opportunity for making the most effective use of this land, without materially undermining the council's strategy for the village.

Recommendation
19.5 I recommend that the local plan be modified by the inclusion of this site within the village settlement boundary.

20. Cromhall - Longcross Farm

Objection
52/010 The Tortworth Estate Company H02 (Settlement Boundary)
Issue
Should this land be identified for development in association with a new primary school?

Reasoning and conclusions
20.1 The site, originally identified as part of this objection, extended to 3.3 hectares and was intended to provide an alternative school site to that identified in the plan, with the balance, about 2.2 hectares, for housing. At the inquiry the objector explained that it was not the intention to seek a housing allocation that would be capable of achieving over 60 new dwellings. Rather, the intention was for the estate to provide the land for the school and make a contribution, through enabling development, to the provision of the school itself. Thus, the objector is not seeking an allocation under policy H1. Rather, it is looking to amend policy LC2 (10) to the effect that land at Longcross Farm will be reserved for a replacement primary school, with the delivery of the site and facility to be partially supported by residential development within the school allocation site. The anticipated scale of housing would be in the order of 20 to 25 units. The housing would only be permitted on the basis of delivery of the school.

20.2 I consider the plan’s strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Cromhall is a small village with a very limited range of local services. There is only a modest level of bus service providing limited connections to the main urban areas. It is a relatively isolated village with occupants of new housing here likely to be very reliant upon the private car, having to travel to Thornbury, or Yate, or further afield for almost all of their daily needs.

20.3 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need, strategically, either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Cromhall. Thus, I do not find there are strategic reasons to extend the settlement boundary here or to allocate land for housing. Under normal circumstances, therefore, there is no question in my mind of supporting development of the scale now suggested in this village.

20.4 However, the context is now much different. Any housing is proposed as part of an enabling process to achieve the provision of a replacement school. The objection’s proposal involves a different site to that defined in the revised deposit plan. The Longcross Farm site lies at the southern end of the village. Any development of this land would extend the built form southwards and would be open to view, particularly for those travelling northwards along the main road. Currently views are possible across the land to a backdrop of housing and farm buildings. The local plan site lies more centrally to the village and would partially fill the gap between the two main areas of the village. The site lies in a slight fold in the land and any development there would be visible but would fit quite well within the landscape.

20.5 In locational terms I consider that there is a slight advantage in the site chosen by the council, though this is relatively marginal in my view. However, I do not consider that the harm caused by the development of the northern part of the Longcross Farm site would be so severe as to rule it out of the question. In my view it is not an unacceptable location for a new school and any enabling development.

20.6 The more crucial question to be answered is whether this is the most realistic and best way of progressing the school proposal. Somewhat surprisingly, the council was unable to give any meaningful information as to the availability of the local plan school site. There had been no direct contact with the owners of that site and the council could not, therefore, give
me any reassurance that the necessary land would become available. Likewise, I have no 
direct information on whether the school proposal is realistically achievable in financial 
terms. Clearly, the objector's revised proposals offer one way of advancing the prospects of 
actually achieving the school on the ground.

20.7 In the council's view the package suggested by the objector does not outweigh any 
conflict with the locational strategy of the plan. Indeed, in my view there needs to be very 
clear and strong reasons to support a proposal that would introduce a further 20 to 25 
dwellings in this village. At the current time I do not find that I can support the objector's 
proposals for these strategic reasons. However, I do consider that the objector's proposals 
potentially offer a substantial benefit in terms of enabling the school to be provided. The 
position with regard to achieving the school through more normal channels is unclear to me. 
I do not know if the land allocated would actually become available, nor do I know the 
likelihood of the necessary resources becoming available through the normal Education 
Authority budgeting processes.

20.8 In these circumstances, I do not consider that the objector's proposals should be 
dismissed without a further serious look. If the school can be achieved through normal 
processes, then I see no reason to support an enabling scheme that would significantly add 
to the size of the village. However, if there is little practical chance of achieving the school 
through the normal processes within a reasonable period, then the council may wish to view 
this option more favourably. In my view, although the housing element would be contrary 
to the plan's strategic approach, the benefits could be seen to outweigh the harm caused to 
that locational strategy. For this reason I do not make a formal recommendation for 
modifying the local plan, leaving the LC2 school site as it is, but I do invite the council to 
give further consideration to this matter.

Recommendation

20.9 I recommend that the council give further consideration as to the most 
appropriate way to progress the provision of the primary school in Cromhall.

21. Falfield - Church Avenue

Objection

427/001 H M Prison Service H01 (Omission Site)

Issue

Whether the site is a suitable one to allocate for development.

Reasoning and conclusions

21.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my 
report. There I conclude that the plan is right not to allocate sites within or adjoining the 
rural settlements for further development. Falfield is a small village set astride the A38. It 
has a very limited range of local services, including a small shop/post office, a church, a hall 
and a public house. It appeared from my site visit that the petrol filling station and 
associated Spar grocers were now closed, though I have no other information to confirm this. 
The village lacks its own primary school. There is a modest level of bus service providing 
limited connections to the main urban areas. It is a relatively isolated village with occupants 
of new housing here likely to be very reliant upon the private car, having to travel to 
Thornbury or further afield, via the M5 or A38, for almost all of their daily needs.
21.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Falfield. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

21.3 That said, this objection site lies within the defined settlement boundary. About a third of the site is covered by a Prison Department building and associated car park. Those parts, together with its curtilage, an area of grassland and trees, the balance of the site, can be classified as being previously developed land. In line with the terms of policy H2, development here would be acceptable subject to the criteria set out in that policy. As PPG3 Annex C indicates, the fact that a site is previously developed does not mean that it all should automatically be suitable for development.

21.4 I agree with the conclusions of the appeal Inspector that development of the whole site would harm the landscape character and appearance of the locality and the setting and rural character of the village. Much of this land is open in character. It adjoins open countryside to the south and the partly undeveloped land to the north east. As such the site has an open and rural feel to it and provides an attractive setting to the housing on the other side of Church Avenue.

21.5 Not only would its development cause material harm to the character and appearance of this part of the village it is not a suitable location to receive any substantial element of housing. The site would be capable of accommodating upwards of 20 dwellings at PPG3 densities. Given its lack of facilities and services and the good road access to nearby urban areas, I do not consider that Falfield can be considered at all as being a sustainable location for development of this scale. Development here would simply encourage dependency upon the motor car.

21.6 I fully accept that my conclusions on policy H2 would presume an acceptability of proposals on previously developed sites such as this within the defined settlement boundary. However, this site includes the only significant area of open land in the village. Few, if any, other village settlement boundaries include vacant sites of this size. There may well be a case for the council reviewing the detail of the settlement boundary in this part of the village to see if it could better reflect the extent of the village within which some small scale development might be acceptable. Be that as it may, the suggested allocation would, to my mind, have unacceptable environmental effects and as a result would be contrary to the terms of policy H2. Bearing in mind the lack of a need to allocate sites in villages such as this and the inherent unsustainability of the location I do not support the objector.

Recommendation
21.7 I recommend that no modification be made to the local plan.

22. Fallfield - Mill Lane

Objections

<table>
<thead>
<tr>
<th>Objection No.</th>
<th>Name</th>
<th>Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>269/001</td>
<td>Mr &amp; Mrs J Richards</td>
<td>H02</td>
</tr>
<tr>
<td>270/001</td>
<td>Mr T White</td>
<td>H02</td>
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Issue

Whether the settlement boundary should be extended to include additional land on the south side of Mill Lane.

Reasoning and conclusions

22.1 I have concluded in the previous item that Falfield is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to enlarge the settlement boundary, nor to allocate additional housing sites. Here the objectors are seeking a minor change to that boundary to reflect what they see as being the natural limits of the village.

22.2 I note the planning history of this part of Mill Lane and that the original boundary drawn in the Rural Areas Local Plan was not challenged at that time. In my judgement, based on the current evidence and my site inspection, the settlement boundary has been drawn logically. I have viewed the site and its setting from public areas along Mill Lane and along the A38. The properties along the north side of Mill Lane are relatively urban in character. In contrast, those on the south side are more spread out, with open land or farm buildings in between.

22.3 In particular, the small group of houses at the end of the Lane around the former Mill, are set well apart from the more focussed development to the west. The piece of ground occupied by the dutch barn is rural in appearance and notwithstanding the barn structure it is largely open in character. In my opinion it forms a very clear separation between the properties down the dip to the east and the village itself. To include the site of the dutch barn within the settlement would allow for its development. Whilst this would entail the demolition of the barn, any visual benefit would be more than offset by the consolidation of development along the south side of the Lane and the consequent loss of the sense of openness. I have no doubt that the settlement boundary should not be extended to include the site of the dutch barn and properties to the east.

22.4 The objectors also seek the inclusion within the village boundary of the property "Champerty" and its grounds. Here, in essence the arguments are the same. Although less clear-cut than the area to the east, the land occupied by this property includes areas of garden on either side. These help to create a sense of dispersed development, of a more rural, open character and appearance than that to the north. In my view the closing of either or both of these gaps would be to the detriment of the character and appearance of this part of the village. In the main views from the A38 and down Mill Lane itself development is more dispersed and rural in character. I consider that the settlement boundary logically reflects the position on the ground and to change it here could cause significant harm to this part of the village.

22.5 I note the way that the settlement boundary has been drawn in respect of Sundays Hill Lane and at the southern end of the A38, where a straggle of development has been included within the defined village. Whatever may be the merits there, I do not consider that these justify the inclusion of additional land in Mill Lane within the settlement boundary. I do not accept the view that every property within a village should automatically be included within the defined settlement boundary, a line defined for planning policy purposes.

Recommendation

22.6 I recommend that no modification be made to the local plan.
23. Falfeld - North of Sundayshill Lane

Objections

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<tr>
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<tr>
<td>24/001</td>
<td>Mr Sprackman</td>
<td>H01</td>
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<tr>
<td>24/002</td>
<td>Mr Sprackman</td>
<td>H02</td>
</tr>
</tbody>
</table>

Issue

Whether the settlement boundary should be extended to allow for the creation of a new focal point for the village, with housing, employment and communal and recreational facilities.

Reasoning and conclusions

23.1 I have concluded in item 21 above that Falfield is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to enlarge the settlement boundary, nor to allocate additional housing sites. Here the objectors are seeking a very substantial change to that boundary to accommodate a mixed development which they see as being a sustainable expansion of the village.

23.2 This is a substantial site, currently rural in character and appearance outside the built-up area of the village. Whilst the concept is generally well thought out and offers a rounded range of uses, it is not one that receives support from guidance at national, regional or strategic level. The village has a very poor range of facilities at the moment and, at best, only a very modest bus service. Because of its location it is likely that development in this area would be very much dependent on the motor car. Only a very sizeable development could create the critical mass to support sufficient a range of facilities and services as to provide a reasonable level of self-sufficiency. In turn, such a scale of development would seriously undermine the strategy of the plan to concentrate development in the most sustainable locations, the main urban areas.

23.3 I have no doubt that the type of development envisaged by the objectors would bring with it a number of benefits to the village. However, I cannot support such a proposal because it flies in the face of the plan's strategy, providing for significant levels of development in a location that is unsuitable to receive it.

Recommendation

23.4 I recommend that no modification be made to the local plan.

24. Falfeld - Old Vicarage and Ambulance Station

Objections

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<tr>
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Issues

Whether the settlement boundary should be extended to the north of the village.

Whether provision should be made for a housing and open space development.

Reasoning and conclusions

24.1 I have concluded in item 21 above that Falfield is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to enlarge the settlement boundary, nor to allocate additional housing sites.
Here the objectors are seeking a very substantial change to that boundary to include the
ambulance station and Highways Agency depot within the village, together with the open
land north of the old vicarage, the latter being considered as being suitable for a small
housing development and public open space.

24.2 The land adjacent to the Old Vicarage is open and agricultural in use and character. It
lies outside the main built-up area of the village. In my view its development would harm
the rural setting of the village and serve to extend it out into the countryside. I find no
support for the inclusion of this land within the settlement boundary for development.

24.3 The depot and ambulance station are accessed via the B4058 and front that road.
Although physically adjoining the built-up area of the village, they do not form part of the
village. They are located to take advantage of the road access to the M5 and to the A38 and
do not form an integral part of the community. I see no compelling reason to believe that
they should be counted as part of the village for planning purposes.

**Recommendation**

24.4 **I recommend that no modification be made to the local plan.**

25. **Fallfield - The Nook**

**Objection**

271/002 Mr & Mrs P J & L D King H02 (Settlement Boundary)

**Issue**

Whether this site should be included within the settlement boundary to enable its residential
development.

**Reasoning and conclusions**

25.1 I have concluded in item 21 above that Falfield is not a sustainable location for further
development beyond that that may be acceptable within the defined settlement boundary.
There is no need to enlarge the settlement boundary, nor to allocate additional housing sites.
Here the objectors are seeking a minor change to that boundary to include the frontage land
between the Nook and the telephone exchange to enable its residential development.

25.2 The site forms part of a much larger field. It has only a narrow frontage to the A38
and existing vegetation limits the views across the field from the A38 to the countryside
beyond. Nevertheless it forms part of the countryside setting of the village and I see no
reason why it should be included within the village boundary. The village boundary in this
location follows the rear of the properties to the north and south, but, for this short section,
fronts the A38. I find nothing illogical in this definition. Bearing in mind, too, the lack of
facilities in the village and its inherent unsustainability as a location for further development
I do not support this requested change to the boundary. To change the boundary could
allow for the consolidation of frontage development along the A38 to the detriment of the
character and appearance of the area.

**Recommendation**

25.3 **I recommend that no modification be made to the local plan.**
26. **Filton/Patchway - Filton Golf Course**

**Objection**

396/009  Filton Golf Club  H01 (Omission Site)

**Issue**

Should this site be allocated for housing?

**Reasoning and conclusions**

26.1 The Filton Golf Course straddles the boundary with Bristol City. The objector is seeking the allocation of that part of the course, about 23 hectares, that lies within the district for housing. The site lies within the Bristol PUA and in those terms must be considered as a broad location suitable for residential development. The council refers to a number of factors that would make the site less suitable than other sites advanced in the plan. I have concluded in the housing chapter that the council has overplayed the role of previously committed and previously allocated sites in terms of the sequential approach. Whilst it is right to reconsider land previously allocated, the site search sequence should reflect current conditions and the increased emphasis on achieving a sustainable pattern of development. Thus, the fact that this site has not been previously allocated or committed for development should not be held against it.

26.2 Nor do I see the fact that it is not previously developed land should be held as a negative factor. This is in the context of the plan having to make allocations on extensive areas of greenfield land. Within the main urban area of Bristol, I do not consider that the differentiation made about whether sites are greenfield or previously developed should materially influence the decisions to be made. If all other matters are equal, then it is clear that preference should be given to previously developed land. However, where, as here, the choice is going to include the merits of a range of greenfield sites within and outside the main urban areas, then due weight must be given to the fact that the site lies well within the urban area. Thus, I conclude that in general terms the site does perform very well in relation to the sequential search for sites.

26.3 The council points out that the site does not meet a number of the maximum recommended walking distances set out in RPG10. Whilst that may be true, there may well be a possibility if this site were to be allocated, particularly if it included the land that extends into Bristol City, to remedy some or all of these deficiencies. The land within this district would be capable of accommodating upwards of 700 dwellings at PPG3 densities. At this scale of development it might well be possible to include measures that increased the accessibility of the site, though I have no information of whether this could be done, nor of how an acceptable access might be achieved.

26.4 My main concern regarding this site is a visual one and the contribution it currently makes towards the character of the surrounding area. This part of the urban area is quite intensively developed, with major commercial activity to the immediate east of the site. I note the comments quoted by the council from its draft Landscape Character Assessment. Broadly, I agree with that assessment. In my view the more elevated land of the golf course provides a very important visual amenity. There are few remaining landscape skylines within the city and in my opinion this site provides a valuable amenity, particularly to those passing along the main road to the south of the sports ground. In my view the loss of this open site would affect the quality, character, visual amenity and distinctiveness of the locality and would thus conflict with policy L6 of the local plan.

26.5 Elsewhere in my report I have supported policy LC9 which aims to protect open spaces and playing fields. I have insufficient evidence before me to indicate whether the criteria of
that policy could be met here. The council has yet to complete its assessment of recreational needs in the area, as per the requirements of PPG17. In the absence of that and any evidence to show that the loss of the golf course would not conflict with the requirements of policy LC9 I shall take a precautionary approach in terms of what could constitute the loss of an important and valuable community facility.

26.6 In conclusion, I find that weighing up the advantages of this location against the loss of a strong visual amenity and potentially valuable and much needed facility leads me to come to the view that the land should not be allocated for housing. I am satisfied that the housing needs of the district can be met by sites that are not materially worse than this site in locational and impact terms.

Recommendation
26.7 I recommend that no modification be made to the local plan.

27. Filton/Patchway - Filton Triangle

Objection
482/001 Terramond Developments Ltd H01 (Omission Site)

Issue
Should this site be allocated for housing?

Reasoning and conclusions
27.1 This site comprises nearly 7 hectares of vacant land, forming the south western quadrant of the Filton junction complex. It is bounded on all sides by railway lines. The objectors suggest the moving of the freight line along the south western boundary to ease the accessing of the land. The alternative would be to provide a bridge or rely upon a level crossing to link it with the housing area to the south. In all, the objectors envisage a development in the order of 150 dwellings.

27.2 The site lies within the Bristol PUA and in those terms must be considered as a broad location suitable for residential development. Although it is a greenfield site, it is clearly within a general area that has priority in terms of the search sequence. The council draws attention to what it sees as a number of limitations. In terms of its current use as informal open space I accept that it does contribute a sense of openness to the area and provide an informal recreational resource. However, I do not consider that this issue should be overstated. The site is well enclosed and somewhat remote. It does not make a particularly significant contribution to the visual amenity of the surrounding area, nor does it feel attractive to the casual user.

27.3 Of more significance is the issue of achieving a satisfactory access to the site. As the current situation is, any residents would have to access their homes by way of a level crossing. That would be their sole access, an entirely unsatisfactory state of affairs. The option of a bridge to span the railway line would appear to be both a very expensive one and one that could have a seriously harmful impact upon the amenities of those living nearby.

27.4 The objectors mention the option of moving the railway line north eastwards. I have no evidence that this would be achievable without seriously harming the operational use of that line. Although the line only carries freight at present it is hoped to upgrade it in the near future to accommodate passenger services between Bristol and Avonmouth. It seems to me that the severe reduction of the radius of this line would impair the operation of the
line. At the very least I am quite unable on the evidence available to conclude that the operation of the line and its potential upgrading would not be prejudiced.

27.5 Further concerns are expressed by the council that even if the site could be accessed the traffic generated by the development would have to pass through the adjoining estate. Though not compelling in itself, there are clearly disadvantages in adding traffic of this scale to these local estate roads which are not suited to carrying increased flows without fairly major traffic management measures.

27.6 In conclusion, this site is well located and it would be a significant gain if it could be brought into productive use. However, I do not have the evidence before me that this could be achieved in a realistic manner without causing harm to the living conditions of local residents or prejudicing the potential benefit of bringing a passenger service along this railway line.

Recommendation

27.7 I recommend that no modification be made to the local plan.

28. Filton/Patchway - Land Rear of Redfield Road

Objection

343/010 Hallam Land Management Ltd H01 (Omission Site)

Issue

Should this part of the employment designation be reallocated for housing?

Reasoning and conclusions

28.1 This site of about 2 hectares comprises a piece of waste ground adjoining the Rolls Royce site. It is currently included within the much larger safeguarded area for employment under policy E3(1), presumably for the possible expansion of the Rolls Royce factory. I have no evidence as to whether there is a need to continue to safeguard it for employment purposes, though its position to the rear of properties in Redfield Road, sandwiched between the railway and the existing employment area, points to the logic of it being held for future employment expansion.

28.2 The site is very difficult to access, unless this was through the employment area. Such an arrangement would not be appropriate to serve a housing development. The local roads linking this site to the A38 are of poor standard and are ill-suited to serving significant additional development. Further, the existing access arrangements on to the A38 for this area are unsatisfactory and residential development here would add to the traffic using this. On the information before me and what I observed on my inspection of the area, I am of no doubt that employment use is the more suitable and appropriate of any future productive use of this land. The council's housing requirements can be achieved without the reallocation of this site to housing.

Recommendation

28.3 I recommend that no modification be made to the local plan.
29. Filton/Patchway - New Road Playing Fields (Old Colstonians), Filton

Objection

88/002 Old Colstonian Society H01 (Omission Site)

Issue

Should a third of this site be allocated for housing?

Reasoning and conclusions

29.1 The objection site comprises a field of about 3.5 hectares of which about two thirds are laid out as a sports ground, with pitches and some changing facilities. The balance of the site, about 1.28 hectares, is rough grassland. The objectors are seeking the allocation, under policy H1A, of the grassland area to provide about 70 dwellings with the existing pitches upgraded to provide high quality sporting facilities, including new changing rooms. The development would also put funding in place to extend the sporting facilities at Colstons School.

29.2 The site lies within the Bristol PUA and in those terms must be considered as a broad location suitable for residential development. I have concluded in the housing chapter that the council has overplayed the role of previously committed and previously allocated sites in terms of the sequential approach. Whilst it is right to reconsider land previously allocated, the site search sequence should reflect current conditions and the increased emphasis on achieving a sustainable pattern of development. Thus, the fact that this site has not been previously allocated or committed for development should not be held against it.

29.3 Nor do I see the fact that it is not previously developed land should be held as a negative factor. This is in the context of the plan having to make allocations on extensive areas of greenfield land. Within the main urban area of Bristol, I do not consider that the differentiation made about whether sites are greenfield or previously developed should materially influence the decisions to be made. If all other matters are equal, then it is clear that preference should be given to previously developed land. However, where, as here, the choice is going to include the merits of a range of greenfield sites within and outside the main urban areas, then due weight must be given to the fact that the site lies well within the urban area. Thus, I conclude that in general terms the site does perform very well in relation to the sequential search for sites.

29.4 The council points out that the site does not meet the maximum recommended walking distance for primary schools set out in RPG10. The deficiency in this respect is not great and bearing in mind the site's location in terms of other facilities I am of the view that this represents a good, sustainable location for residential development. Whilst it is difficult to make a direct comparison with other allocated sites, I am of the view that the location, within the PUA, makes this a site eminently suited in sequential terms to a residential scheme. I cannot accept the council's view that this would in any way undermine the locational strategy of the JRSP.

29.5 The evidence submitted by both the objector and the council refers in some detail to the application of policy LC9, the protection of open space and playing fields. It has to be borne in mind that the part of the site being proposed for residential development is currently unused grassland. It is not laid out for pitches. I also accept the view put that the existing facilities are in generally poor shape and that an upgrading of them could significantly increase their usefulness as a local facility.

29.6 It is not for me to go into great detail as to the application of that policy to a specific proposal. That is for any planning application stage. However I would comment as follows:
Whilst a housing development would result in the loss of land that has the potential to provide sporting facilities, the loss is of currently unproductive land. In that sense it would not worsen the picture. Tied in with the housing proposals is the declared intention to upgrade the existing facilities and to invest money at the School. Whilst the school is not easily accessible to this area, the net effect is not likely to worsen the "fit for purpose" deficiencies in the North Fringe identified by the council. On the contrary, they are likely to improve provision. The proposals provide for enhanced outdoor facilities. Thus, it seems to me that in principle the proposals would not conflict with policy LC9.

29.7 I note the appeal decision made almost 10 years ago. That sought the development of the whole site, with the relocation of the sporting facilities to an alternative site, at that time unknown. That decision was also made in the context of an over provision of housing land. Today, there is a need for housing land to meet the housing requirements beyond that provided for in the revised deposit plan. Only part of the site is proposed, with the majority remaining open. It is my assessment that bearing in mind the development that has taken place and is still taking place in the area that development of one third of the site would not have a deleterious effect upon the appearance and character of the area. Much of the site and adjoining land would remain open.

29.8 Whilst alternative sources of funding might be available to upgrade the facilities that does not mean that this proposal should not be supported. It provides for housing in a sustainable location. It would not cause harm to the character of the area and would have material, positive benefits to the provision of recreational provision in the area, in accord with policy LC9. The improvement of existing facilities is in tune with the guidance in PPG17. Whilst some aspects may not fully accord with all detailed guidance in PPG17, I am in little doubt that looking at the proposal in the round it has a great deal to offer in terms of improving sporting provision in the area.

29.9 In conclusion, I support the objection. The housing element should be added to policy H1A to provide for 70 dwellings. This is very much tied in with the proposals for improving the existing provision both on this site and at Colstons School. This can be referred to in the supporting text. Additionally, it would be appropriate to add this site to policy LC7 which sets out those sites where enhancements are to be made to formal open spaces. That would be a more appropriate home than policy LC9 which relates to protection of open spaces.

**Recommendation**

29.10 I recommend that the local plan be modified by

i) the addition of the following to policy H1(A):

"1.28HA New Road, Filton  Min av density 50  Dwelling target 70"

ii) the addition of supporting text to relate the proposal to the enhancement of sporting facilities on the balance of the site and at Colstons School,

iii) the addition of the enhancements proposed to policy LC7.

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**30. Frampton Cotterell - Park Farm/Woodlands Farm**

**Objections**

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<th>Type</th>
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<tr>
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<td>Hallam Land Management Ltd</td>
<td>H01 (Omission Site)</td>
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<tr>
<td>430/021</td>
<td>Cala Homes (South) Ltd</td>
<td>H01 (Omission Site)</td>
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South Gloucestershire Local Plan - Inspector’s Report

Chapter 8a - Omission Sites

430/025 Cala Homes (South) Ltd H02 (Settlement Boundary)
438/019 Mr L Smith H02 (Settlement Boundary)
438/023 Mr L Smith H02 (Settlement Boundary)
438/025 Mr L Smith H01 (Omission Site)

Support

203/031 Frampton Cotterell Parish Council H02 (Settlement Boundary)

Issues

What is the status of this land?

Should it be included in the settlement boundary and allocated for development?

Reasoning and conclusions

30.1 The objection site lies within the "horseshoe" of open land formed by the three adjoining settlements of Frampton Cotterell, Coalpit Heath and Winterbourne. (For brevity, referred to in this section as Frampton Cotterell) Apart from the objections lands Frampton Cotterell is surrounded by green belt. The objection site itself has had a fairly complicated recent history. The 1968 Gloucestershire Development Plan Review excluded large tracts of land around Frampton Cotterell from the green belt and identified them as white areas, on the basis that they may later be allocated for development. Subsequently, the Avon Structure Plan extended the outer boundary of the green belt to the edge of Thornbury. In recognition of this the council approved a number of changes, which included the washing over of this area with green belt.

30.2 The Rural Areas Local Plan sought to formalise this revised position. In due course the RALP was adopted, with the open land included within the green belt, notwithstanding objections and a non-supportive recommendation from the local plan Inspector. A subsequent High Court appeal against the inclusion of the Woodlands Farm area within the green belt succeeded on the basis of an absence of reasoning on exceptional circumstances. Thus the land at Woodlands Farm, the subject of these current objections, lies outside the green belt, whilst all the other open land around Frampton Cotterell, not the subject of the High Court challenge, is now within the green belt.

30.3 Thus, the land in question lies neither within the green belt nor within a settlement boundary. Its status in 1968 was as white land, being held for future development if needed. It seems to me that things have moved on since then. Annex B to PPG2 offers some guidance on this matter. Paragraph B3 and B4 offer advice on suitable locations for what is formally referred to now as "safeguarded land". Such land should be well integrated with existing development, well related to public transport and other existing and planned infrastructure, so promoting sustainable development. In identifying safeguarded land account should be taken of PPG3 and PPG13 and other matters. Paragraph B5 goes on to say that development plans should state clearly the policies applying to safeguarded land.

30.4 Elsewhere in the local plan, policy GB4 identifies safeguarded land at Harry Stoke. There is no such policy for this area of land. Further, it is clear to me that this land does not offer an appropriate location for a sustainable development in accord with the principles set out in PPG3, PPG13 and elsewhere, including RPG10 and the JRSP. I expand on those views below. There is, in a formal policy sense, no such thing as white land. What is relevant is the policies and guidance in relation to safeguarded land. I have no doubt that at the current time it would be wrong to treat this land as safeguarded land, because I do not consider that it is suitable for development if the need were established. In my view the council is right to treat this land simply as countryside between the settlement and the green belt boundary. To give it greater status would not be appropriate, having regard to current regional and strategic guidance and to the desire to achieve a sustainable pattern of development in the district.

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30.5 Elsewhere in the plan, policy GB4 expressly refers to a safeguarded site, at Harry Stoke. It appears to be the intention of the plan that other land between the edge of settlements and the inner green belt boundary is not to be treated as safeguarded land, but, rather, as any other area of open countryside outside defined settlements. Such land would be considered as potential future development land only as part of a wider local plan exercise which was considering all options. There would be no expectation or presumption that the land was suitable for development once a need was established. I consider that the text of the plan, possibly in chapter 5, should make this clear.

30.6 I have commented in chapter 2 that Frampton Cotterell is not dissimilar in size to Thornbury. However, I have no doubt that it does not perform the function of a local centre in the way that Thornbury does. As a settlement, Frampton Cotterell is well spread out, with no central focus. Overall, its facilities and services are very limited. Its bus links to the Bristol area are only modest for a settlement this size and for most people the car offers the most likely form of transport. Accordingly, I place this settlement some way below Yate and Thornbury in terms of any hierarchy of settlements. It has a separate and distinct identity to that of the PUA. Although Frampton Cotterell is only a short distance from the edge of Bristol and is on a Transport corridor, I do not consider that this elevates the settlement to the standing of an urban area or makes this a sustainable location for significant future development.

30.7 I consider the plan's strategy in chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable locations such as here.

30.8 I do not consider that there is a need either to extend settlement boundaries, or to make greenfield peripheral allocations in this settlement. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. In this respect the council points out that there have been over 400 completions in the settlement from 1996 to 2003 and that there remain a further 64 commitments. I consider that this level of growth is more than sufficient for the settlement and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

30.9 For all these reasons I do not support the allocation of this site. It currently is open and rural in appearance, providing an attractive, rural setting to this edge of the settlement. Whilst the northern portion of the land relates better to the built-up area than the larger area to the south, I find no reason to support its allocation. It is capable of being served by only a limited range of bus services. It is remote from most facilities, including shops and employment opportunities. More development here would be likely to increase the dormitory role of the settlement. For the same reasons I do not support the suggestion that land here be reserved for future development. Any future spread of development will be considered in the drawing up of a plan to replace this one. At that time that process can consider the merits of all the possible options available. In the meantime I consider that this land should not be allocated or reserved for development.

**Recommendation**

30.10 I recommend that the local plan be modified by the addition of some text, to chapter 5, to explain the status of unallocated land located between the edge of settlements and the inner green belt boundary.
31. Frampton Cotterell - Pumping Station, Church Close

Objections

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<tr>
<th>440/001</th>
<th>Bristol Water Plc</th>
<th>H01 (Omission Site)</th>
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<tr>
<td>440/002</td>
<td>Bristol Water Plc</td>
<td>H02 (Settlement Boundary)</td>
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Issue

Do the exceptional circumstances exist that would allow the site to be taken out of the green belt, included within the settlement boundary and allocated for development?

Reasoning and Conclusions

31.1 This former water pumping station lies at the edge of Frampton Cotterell. Currently it is excluded from the settlement and is covered by green belt notation. I note that planning permission has been granted for the conversion of the pumphouse to a dwelling and observed recently that work appears to be underway to that effect. The objection is seeking to be allowed to develop the body of the site for a small housing development, by way of its removal from the green belt and its inclusion within the settlement boundary.

31.2 In my view the site lies outside the natural framework of the village. It extends out in a finger from Church Close into the area behind the frontage development. Although the site contains the pumphouse building, water tank and areas of hardstanding, it retains a sense of openness. Most of the site is open. The built development is not so prominent as to detract from that sense of openness. For much of the depth of the site it is bounded by trees and woodland, which add to the perception of the area behind the frontage development being mostly undeveloped. It has much more of an open, undeveloped character than those areas included within the settlement boundary. Development of this site would diminish the openness of the site and would extend the built-up area of the village beyond its current limits out into the surrounding area. As such, I consider that the site serves a green belt purpose of assisting in safeguarding the countryside from encroachment.

31.3 I acknowledge that policies on sustainable development aim to make use of previously developed land and maximise such opportunities. However, I have concluded previously that there is no need for the plan to identify further land that would justify drawing back the settlement boundary in this village. I do not consider it a particularly sustainable location. I note, too that part of the site is being developed for a dwelling and residential curtilage. That would be in accord with green belt policies for the re-use of existing buildings. That the site is previously developed does not justify the removal of land from the green belt. I do not consider that these and any other matters put before me can be said to constitute the necessary exceptional circumstances such as to justify drawing back the green belt boundary from this finger of land.

Recommendation

31.4 I recommend that no modification be made to the local plan.

32. Hallen - Berwick Lane

Objection

| 27/002 | Mr D R Osborne | H02 (Settlement Boundary) |

Issue

Should this land be included within the settlement boundary?
Reasoning and conclusions

32.1 In the deposit draft plan part of this site was inadvertently shown as being within the settlement boundary. The revised deposit version shows the whole of this land as being outside the settlement boundary. This tallies with the boundary as shown on the previous RALP. I shall treat the deposit version boundary as an error which has been corrected by the revised deposit plan. Accordingly, this objection refers to the possible inclusion within the settlement boundary of the whole of the land referred to by the objector.

32.2 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Hallen is a very small village with a very limited range of local services, having a shop, amenity centre, village hall and playing fields. It has no school. It is set within an area of countryside washed over by the greenbelt. The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need to extend village settlement boundaries to provide for new areas of housing in Hallen. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions, such as proposed for the barn on this site. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

32.3 Inclusion of this open site within the settlement boundary would allow a substantial expansion of the village contrary to the plan's strategy and to the aims of the green belt which covers this site and washes over the whole village.

Recommendation

32.4 I recommend that no modification be made to the local plan.

33. Hallen - Church Farm

Objection

142/001 Alvis Brothers Ltd H02 (Settlement Boundary)

Issue

Should the land granted planning permission be now included within the settlement boundary?

Reasoning and conclusions

33.1 I have concluded in the previous item that there is no need to extend the settlement boundaries to provide for new housing in the village. Such a move would be contrary to the plan's strategy and to the aims of the green belt which covers this site and washes over the whole village.

33.2 The objection site comprises flat, open agricultural land which forms part of the wider countryside setting of this small village. Development here would extend the built form of the village to the detriment of its appearance and character and would harm the openness of the green belt. Unusually, in this case there is an extant planning permission, recognised by
the Certificate of Lawful Development issued in 1998. That provides for a detached dwelling and three terraced houses as replacement for dwellings now demolished. Whilst a start has been made on the implementation of that permission, on the ground there is no sign of any new building and the site remains open in appearance and character.

33.3 There appears to be no legal impediment to the erection of these 4 dwellings. However, I am reluctant to alter the settlement boundary in this location on the basis of a long standing planning permission. In any event, the settlement boundary is drawn to show where certain policies apply and not to define the physical extent of the village. That being the case and with no visible evidence of new building here, I consider that the boundary should remain unchanged in this location. If the buildings were to be built, then the council would have the opportunity to review the position and change the boundary if it thought that this was appropriate in the light of the changed circumstances.

**Recommendation**

33.4 I recommend that no modification be made to the local plan.

### 34. Hambrook - Hambrook Farm

**Objections**

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<tr>
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<th>Objector</th>
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<tr>
<td>26/001</td>
<td>Executor of Mr J J Baylis</td>
<td>H01 (Omission Site)</td>
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<tr>
<td>26/002</td>
<td>Executor of Mr J J Baylis</td>
<td>H02 (Settlement Boundary)</td>
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*This site is considered in chapter 5 of my report, under item 13*

### 35. Hambrook - Mirehouses

**Objection**

<table>
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<tr>
<td>189/001</td>
<td>Walter Raph Butt &amp; Roystan Hewetson (Trustees)</td>
<td>H02 (Settlement Boundary)</td>
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*This site is considered in chapter 5 of my report, under item 14*

### 36. Hanham - Abbots Road

**Objection**

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<th>Objector</th>
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<tbody>
<tr>
<td>41/006</td>
<td>Redcliffe Homes Ltd</td>
<td>H01 (Omission Site)</td>
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**Issue**

Should this site be allocated for housing development?

**Reasoning and conclusions**

36.1 This site lies on the north side of Abbots Road. Of its 1.1 hectares, the objector suggests the development of only the southern two thirds, 0.725 hectares, so as to allow views across the northern portion. This reduced site area would accommodate about 23 dwellings. The site lies just outside the green belt, part of a larger undeveloped area between the green belt and the existing edge of the built-up area. This area, under the Kingswood Local Plan, was referred to as being without notation and was to be treated as a
land resource to meet development needs beyond the plan period. Much of that land has since been subject to development; this being one of the few pieces not yet developed.

36.2 Bearing in mind that the site lies outside the green belt and in this revised draft plan is not subject to any other designation, I see no strategic, in-principle, objection to its development. Bearing in mind too my conclusions in respect of policy H2, the fact that it is open, undeveloped land should not, in-principle, count against its identification for development. The major concern in my opinion is the impact of development on this site upon the character and appearance of the area, primarily in respect of the views to Stonehill and the Hanham Hills.

36.3 This site has been the subject of appeals which have dwelt upon this issue at some length and I note the views expressed there. I share those Inspectors' appreciation of the importance of Stonehill and the Hanham Hills in the local landscape and in turn the importance of the views to and from this area. Intermittent and partial views of Stonehill and Hanham Hills are possible from parts of Whittuck Road and along parts of Abbots Road, not least across the adjoining sports ground. In my opinion these views are an attractive and valued feature of this part of the built-up area. Views are possible across the objection site itself to the Hills beyond. Whilst it is not possible to say that these particular views are the most important, rather it is the accumulation of views and glimpses of views that provides the composite sense of the area's landscape setting. It is clear that any blockage of these views would diminish the character and sense of openness to be found in this part of the urban edge provided by this wider landscape setting.

36.4 Given the amount of new development that has taken place in the area in recent years, I believe that remaining views should be protected in the interest of the character and appearance of the area. This site, part of a wider area of open land between the Hills and the Avon valley, performs an important function in maintaining a visual link between the residential area and the open Hills. I note that it would be the objectors' intention to build on only part of the site. That would help to minimise any impact upon views across the sports ground. It may also be possible to allow views between the dwellings on the site to the open land beyond. However, in my judgement the impact on views across the site would still cause material harm to the character of the area. I note the comments expressed in relation to the Kingswood local plan policies. In coming to my judgement upon this matter I give weight to the relevant revised deposit local plan policies. In my opinion, to allow a development of this site would be contrary to the aims of policies L1 and L6 of the plan.

36.5 Further weight against the allocation of all or part of this site is given by the role of the open nature of this site. The site is part of a much wider swathe of open land on the west side of the Ring Road, a swathe that links in visually with the open hillsides to the east of the road. This open land also continues, in various guises, to link this area with the Avon valley. The existing buildings in Crossleaze Road are relatively unobtrusive and do not detract from the sense of openness north of Abbots Road. The site is not especially prominent in views from Stonehill, but development here on any significant scale would diminish the open character at this urban edge. I believe that any substantial development of this site would cause harm to the appreciation of the wider landscape and would unacceptably detract from the character of this part of the urban fringe. I do not consider that the need to identify development sites in the district is so strong as to weigh in favour of this site, over the harm that I have identified that could arise.

Recommendation

36.6 I recommend that no modification be made to the local plan.
37. Hanham – Hanham Hills and Abbots Road/Court Farm

Objection

313/006,009,010 Matchmove Ltd H02 (Settlement Boundary)

I have considered this objection in chapter 5 of my report under item 16

38. Hanham – Whittucks Road/Abbots Road

Objection

322/001 Wilson Connolly H01 (Omission Site)

Issue

Should this site be allocated for housing?

Reasoning and conclusions

38.1 This site lies at the junction of Whittucks Road with Abbots Road. Of its 0.72 hectares, the objector envisages that whilst the whole site would be subject of allocation, only about 0.4 hectares would be developed, with the balance remaining open to retain the open views to the Hanham Hills. The site lies outside the green belt, part of a larger undeveloped area between the green belt and the existing edge of the built-up area. This area, under the Kingswood Local Plan, was referred to as being without notation and was to be treated as a land resource to meet development needs beyond the plan period. Much of that land has since been subject to development.

38.2 Bearing in mind that the site lies outside the green belt and in this revised draft plan is not subject to any other designation, I see no strategic, in-principle, objection to its development. Bearing in mind too my conclusions in respect of policy H2, the fact that it is open, undeveloped land should not in-principle count against its identification for development. The major concern in my opinion is the impact of development on this site upon the character and appearance of the area in respect of the views to Stonehill and the Hanham Hills.

38.3 This site has been the subject of appeals which have dwelt upon this issue at some length. I share those Inspectors’ appreciation of the importance of Stonehill and the Hanham Hills in the local landscape and in turn the importance of the views to and from this area. Intermittent and partial views of Stonehill and Hanham Hills are possible from parts of Whittook Road and along parts of Abbots Road. In my opinion these views are an attractive and valued feature of this part of the built-up area. Views are possible across the objection site. Whilst it is not possible to say that these particular views are the most important, it is clear that any blockage of these views would diminish the sense of openness to be found in this part of the urban edge provided by the wider landscape setting. Given the amount of new development that has taken place in the area in recent years, I believe that remaining views should be protected in the interest of the character and appearance of the area. This site, part of a wider area of open land between the Hills and the Avon valley, performs an important function in maintaining a visual link between the residential area and the open Hills.

38.4 To allow a development of this site would be contrary to the aims of policies L1 and L6 of the plan. I note that it would be the objectors’ intention to build on only part of the site. It may well be that a small development on part of the site would be able to protect to a high degree the views across it to the hills. However, that is something that could best be determined in a detailed scheme through the development control process. I do not consider
that the suggestion of a partial development enables me to overcome my concerns and support the allocation of the site. Although the site is not prominent in views from Stonehill, I believe that any substantial development of this site would cause harm to the appreciation of the wider landscape and would unacceptably detract from the character of this part of the urban fringe. I do not consider that the need to identify development sites in the district is so strong as to weigh in favour of this site, over the harm that I have identified that could arise.

**Recommendation**

**38.5** I recommend that no modification be made to the local plan.

**39. Hawkesbury Upton – Back Street**

**Objection**

280/001 Mr D Watts H02 (Settlement Boundary)

**Issue**

Should this land be included within the settlement boundary?

**Reasoning and conclusions**

39.1 Hawkesbury Upton is a small village with a modest range of facilities, including a school, a shop and a Post office. The objector is seeking the inclusion of a group of residential properties and a farm complex within the settlement boundary. This group immediately adjoins the current settlement boundary and the main body of the village to the south. Settlement boundaries are aimed at defining the areas within which further development may be acceptable, not at defining the physical extent of the village.

39.2 The village lies within the Cotswolds AONB and much of it, including almost all the objection site falls within the Conservation Area. The village is remote from the main urban areas and is served by a modest road network. For the reasons I have spelled out in the strategy chapter and in the item below I do not consider that the village is appropriate for further development beyond that which can take place incrementally within the defined boundary. For strategic reasons and for aesthetic ones, I do not support the extension of the settlement boundary in this village. The area in question has a different character and appearance from the bulk of the more intensively built-up areas of the village to the south. With the farm complex, it has a more rural feel and character.

39.3 Inclusion within the settlement boundary could encourage a more intensive development of this area, which could serve to urbanise this area to the detriment of its character and appearance. Further, creating a more permissive regime would not be in accord with the generally restrictive approach of the strategy of the plan to new housing in the more rural areas. Any proposals for this area can more appropriately be judged against the plan’s policies for areas outside the defined villages, which allow for some forms of development.

**Recommendation**

**39.4** I recommend that no modification be made to the local plan.
40. Hawkesbury Upton – Park Street

Objection
275/003 Robert Hitchings Ltd H01 (Omission Site)

Issue
Should this site be allocated for housing and open space development?

Reasoning and conclusions

40.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Hawkesbury Upton is a modest sized village set in open countryside within the Cotswolds AONB. It is remote from the main urban areas and is accessed by country roads. It has a limited range of local services, including a school, a small shop, post office, a hall and two public houses. There is a modest level of bus service providing limited connections to the main urban areas. It is an isolated village with occupants of new housing here likely to be very reliant upon the private car, having to travel to Yate or further afield via the A46 to Bath or Bristol for almost all of their daily needs.

40.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Hawkesbury Upton. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions to support existing facilities. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district. I do not believe that the guidance in PPS7 and elsewhere about sustaining rural services and settlements outweighs these other considerations such as to justify making allocations here.

40.3 Certainly, it is difficult to establish the extent of development that might be justified in terms of supporting and sustaining local services. I am not convinced by any evidence that an addition of 30 or so houses would materially improve the level and range of locally provided services. I am also of the view that in a district of this size, where no village is that remote from the main urban areas, including the Bristol conurbation, the question of the sustaining of viable village communities is less important strategically. Even if this issue were to be paramount I am not convinced that Hawksbury Upton would be the best placed of the villages in this area on which to base that strategy.

40.4 Accordingly, I am not persuaded that a site should be allocated for development adjoining the village. Nor do I consider that the need for affordable housing justifies that approach. If there is a defined need for such housing in the village, then there are other ways of achieving it. As far as the site specifics of this objection are concerned, I find that these generally add weight to the case against the allocation being made. On their own they are not in themselves compelling, but development here would materially affect the character and appearance of this end of the village and would rely on access that is currently unsuited for that purpose.

Recommendation

40.5 I recommend that no modification be made to the local plan.
41. Horton – Horton Hill

Objection

90/001 Mr D Pearce H02 (Settlement Boundary)

Issue

Should the settlement boundary include land at the eastern end of the village?

Reasoning and conclusions

41.1 Horton is a very small village with very limited facilities, although it does have a school. The objector is seeking the inclusion of the school building and residential properties and a farm complex within the settlement boundary. The school building lies to the north of Horton Hill, on rising ground, the others run along the south side of the road. Settlement boundaries are aimed at defining the areas within which further development may be acceptable, not at defining the physical extent of the village. I note the comments made regarding paragraph 8.118 of the plan, but see no inconsistency between this and the way that the council has drawn the boundary here.

41.2 Although there may be some uncertainty over the future of the school, I see no reason why this justifies its inclusion within the settlement boundary. The school building stands a little apart from development along Horton Hill. Any proposals can be judged against the plan’s policies. Whilst development on the south side extends the built form of the village the short line of houses is separated from the main body of the village by the farm buildings and yard. Inclusion within the settlement boundary could encourage a more intensive development of this area, which would not be in accord with the generally restrictive approach of the strategy of the plan to new housing in the more rural areas. It could also have the effect of consolidating and extending the built form to the detriment of the area’s character. Any proposals for this area can be judged against the plan’s policies for areas outside the defined villages, and in this connection I note that a recent conversion has been permitted on this site.

Recommendation

41.3 I recommend that no modification be made to the local plan.

42. Littleton upon Severn - Sanctuary Reach

Objection

439/001 Countryside Residential (South West) Ltd H01 (Omission Site)

Issue

Should this site be allocated for housing?

Reasoning and conclusions

42.1 This site is an extremely isolated one, reached by narrow country lanes. A former brickworks, it now contains a number of commercial buildings and, as I observed on my site inspection, substantial additional buildings are being developed on the site. It is not clear to me whether these buildings replace the previously expressed wish for housing development here, or whether the housing objection is still extant. The land may well be previously developed. Be that as it may, I have absolutely no doubt in my mind that this is an entirely unsustainable location for new housing development. The site is remote from any sizeable
village or town. Apart from the employment provision there are no facilities or services in the area. The site is entirely dependent upon the use of the car and is accessed by way of unsuitable, narrow country roads.

Recommendation

42.2 I recommend that no modification be made to the local plan.

43. Longwell Green - Aldermoor Way

Objections

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<tr>
<th>Objection</th>
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<th>Type</th>
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<td>Hartwell Plc</td>
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This site is considered in chapter 7 of my report at item 18

44. Mangotsfield - Pomphrey Hill

Objections

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<td>199/003</td>
<td>Mr J Brown</td>
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This site is considered in chapter 5 of my report, under item 18

45. Oldbury on Severn - Chapel Road

Objections

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<td>Mr J Riggs</td>
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<td>Mrs G E Coles</td>
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<td>Mr R N Weldon</td>
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<tr>
<td>184/001</td>
<td>Mrs S J Hall</td>
<td>H02 (Settlement Boundary)</td>
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Issue

Whether the settlement boundary should be extended to allow for further residential development.

Reasoning and conclusions

45.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Oldbury is a small village with a very limited range of local services, including a primary school, church, a hall and two public houses. Two of these, the primary school and the church are located well away from the heart of the settlement and are reached via a rural lane. It has no shops. There is a very skeletal bus service. It is a relatively isolated village with occupants of new housing here likely to be very reliant upon the private car, having to travel to Thornbury or further afield for almost all of their daily needs.

45.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the
defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Oldbury. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

45.3 Two areas are put forward along Chapel Road for extensions to the settlement boundary to accommodate additional housing. The first of these, advanced by Mrs Hall, comprises undeveloped land adjoining existing property. The village is characterised by low density frontage properties, interspersed with open areas of land. Overall, the character is of a loosely developed rural village spreading out along the village roads. Given the undeveloped nature of this land I fully accept that it should not be included within the settlement boundary of the village. I note the development that has taken place opposite, but that appears to have been within the existing settlement boundary or relates to the conversion of existing buildings. Be that as it may, development on this site would, in my view unacceptably extend the existing built up area of the village to the detriment of its character and appearance. Allowing development here would unacceptably conflict with the plan’s strategy for a sustainable pattern of development.

45.4 The second site lies to the rear of The Stores. The council has been supportive of residential development of the frontage, which lies within the settlement boundary but opposes extending that boundary to allow for an extended housing site. I fully endorse the council’s position. The land has been subject of unauthorised tipping, which the council hopes to see resolved through the frontage development. The state of the land does not justify, in my opinion, allowing development within the land to the rear. This land at the rear was, I understand, formerly orchard land and I do not consider that its use for tipping changes its definition as being a greenfield site.

45.5 Based on PPG3 minimum densities this enlarged site would be capable of development of upwards of 17 dwellings, well out of scale with the village. Development of this area behind the existing frontages would be out of character with the village, altering the open, rural feel of the village and would conflict with the plan’s strategy of achieving a sustainable pattern of development. Aside of any objection on flooding grounds, I conclude that there are compelling reasons not to support the extension of the settlement boundary along Chapel Road.

Recommendation

45.6 I recommend that no modification be made to the local plan.

46. Oldbury on Severn - Westend Lane

Objection

21/001 Birch Cullimore & Co H01 (Omission Site)

Issue

Does the village need further housing to remain a viable and active village?
Reasoning and conclusions

46.1 As I have concluded in the previous item, there is no need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Oldbury. There still remains the opportunity for incremental, organic growth through infilling, redeveloping and conversions. This is a very large, largely greenfield site capable of accommodating a substantial level of development. It is properly defined as lying outside the settlement boundary. Existing services and facilities are extremely limited. In order to create a critical mass of development that would realistically provide and sustain a reasonable level of services and facilities here, would involve development of a scale quite inappropriate to this small rural village. It would be in direct conflict with national, regional and strategic guidance and be contrary to the plan's own strategy.

Recommendation

46.2 I recommend that no modification be made to the local plan.

47. Pilning - Telephone Exchange

Objection

294/002 British Telecom Plc H02 (Settlement Boundary)

Issue

Is it appropriate to include this land within the settlement boundary?

Reasoning and conclusions

47.1 The objection site comprises a telephone repeater station and exchange, a new doctors’ surgery, a field and a small overgrown area. It is shown in the plan as lying outside the defined settlement boundary of Pilning and in the green belt. Elsewhere in my report, in item 39 of chapter 5, I have not supported the extension of the green belt to wash over the settlement. That position does not alter the fact that the objection site lies within the green belt. The settlement boundary (together with the original green belt boundary) has been drawn along the line of the Pill rhine. In my view this represents a clear physical feature separating the main built up area of the village from the looser, outlying part to the north.

47.2 The purpose of defining settlement boundaries is not to define the physical extent of the village, but, rather, to define the area within which a more permissive planning regime will apply. The objection site currently lies within the green belt and would continue to do so even if I were to support the objection. Thus any proposals would continue to fall to be judged against the restrictive green belt policies which presume against inappropriate development. Nevertheless, some development might be possible on the built-up parts of the site. Pilning is a small village and elsewhere I have supported the strategy of the plan to concentrate development in the most sustainable locations. I have concluded that there is no strategic justification to allocate land or extend settlement boundaries in the villages.

47.3 Here, the buildings on the site relate visually to the village and I note that the council invites me to consider whether the BT site and the surgery should more appropriately be included within the settlement boundary. However, the existing boundary is a clearly defined one which is used to define the northern and eastern boundary of the village. To draw it northwards at this one point would detract from the clear and firm edge and bearing in mind my strategic conclusions about the relative unsustainability of villages such as this
and the green belt notation, I do not support any redrawing of the settlement boundary in this area.

**Recommendation**

47.4 I recommend that no modification be made to the local plan.

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**48. Pucklechurch - Abson Road/Back Lane**

**Objection**

350/001 Mr B M Angell H02 (Settlement Boundary)

**Issue**

Should this land be included within the settlement boundary?

**Reasoning and conclusions**

48.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Pucklechurch. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

48.2 In this context I consider that there is no strategic need to expand the village. The land subject of this objection lies to the south of Back Lane. Back Lane forms a clear physical divide between the main body of the village and the outlying properties to the south. The council has, in my view, correctly drawn the settlement boundary to exclude the objection site. To the north, the area is well built-up. To the south buildings are more sporadic in nature, their character owing more to a rural situation than the more urban parts of Pucklechurch. The purpose of the settlement boundary is not to define the total extent of the village, but to define, for planning purpose, those areas where some development may be acceptable.

48.3 The objection site lies within the green belt, where there is a presumption against inappropriate development. To include this land within the settlement would open up the possibility of further development which would consolidate the built form to the detriment to the openness of the green belt and the character of this fringe area. It is not unusual for settlement boundaries to be drawn to exclude properties at the edge of villages. I find no inconsistency in the council's approach here. Each part needs to be considered on its particular merits and in this particular case I consider that the council has properly adopted the line of Back Lane as marking the boundary, for planning purposes, between the village and the countryside. I find nothing in the way that the council has drawn the boundary elsewhere around the village to lead me to think that the council has acted unreasonably here.
Recommendation

48.4 I recommend that no modification be made to the local plan.

49. Pucklechurch - Abson Road/Feltham Road

Objection
13/002 Mr C J Simpson H01 (Omission Site)

Issue
Should this site be allocated for housing?

Reasoning and conclusions

49.1 I consider the plan’s strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Pucklechurch. Pucklechurch is a large village with a good range of facilities, including some employment opportunities within the village.

49.2 That said, I consider that the main urban areas are the more sustainable locations for planned growth. If further sites were needed, then Yate and Thornbury would offer the more appropriate locations before any of the villages. As the figures provided by the council indicate, there still remains significant opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

49.3 The objector indicates that he envisages the site being developed for bungalows for the elderly. Whilst I can understand the benefits of providing this type of housing I do not consider that the evidence suggests that the need is so great as to override the strategic objections. If there is a need for affordable housing in or close to the village this can be provided by way of policy H7. In this connection I note that there is an application pending for 72 housing association dwellings in the village. In addition, the site lies within the green belt. Its allocation for housing would necessitate the removal of the land from the green belt. The circumstances here cannot be said to be exceptional such as to justify this action. The land lies to the east of Abson Road and forms part of the open, rural setting of the village and is properly included within the green belt.

Recommendation

49.4 I recommend that no modification be made to the local plan.
50. Pucklechurch - Kings Lane

Objection

<table>
<thead>
<tr>
<th>Objection No.</th>
<th>Name</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>91/003</td>
<td>Mr A Davison</td>
<td>H02 (Settlement Boundary)</td>
</tr>
</tbody>
</table>

This site is considered in chapter 5 of my report, under item 20

51. Pucklechurch - Parkfield Road

Objection

<table>
<thead>
<tr>
<th>Objection No.</th>
<th>Name</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>145/001</td>
<td>Mr M J Davison</td>
<td>H02 (Settlement Boundary)</td>
</tr>
</tbody>
</table>

Issue

Should this land be included within the settlement boundary?

Reasoning and conclusions

51.1 The settlement boundary currently is drawn tightly around the property, no. 42 Parkfield Road, with the remainder of the curtilage lying outside, in the green belt. The objector is seeking a minor amendment to the settlement boundary so as to facilitate a range of possible building options to improve the property. A change to the green belt boundary is not being sought. In my view the council is right to draw the settlement boundary and the green belt boundary tightly around the existing property, so as not to encourage peripheral expansion of built development out from the village along the more open north side of Parkfield Road. I note the suggestion that the green belt boundary has been drawn differently in this plan compared with the RALP. Whilst there is clearly a difference in respect of where it runs along the road, it is not clear to me that it has treated this particular property differently. The green belt boundary generally follows clear physical features, though in cases like this it is not unusual to be drawn across curtilages, close to buildings, to avoid development within those open curtilages.

51.2 The council indicates in its response that excluding the curtilage of No. 42 from the settlement boundary does not preclude the limited extension, alteration or replacement of the property. This would, of course, be subject to the openness of the green belt not being prejudiced. I see no pressing justification for moving the settlement boundary. Nor does it seem to me that there are exceptional circumstances to change the green belt boundary, which would be necessary if the settlement boundary were to be changed for this inset village.

Recommendation

51.3 I recommend that no modification be made to the local plan.

52. Rangeworthy - Hollies Farm

Objection

<table>
<thead>
<tr>
<th>Objection No.</th>
<th>Name</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>258/001</td>
<td>Hannick Homes &amp; Developments Ltd</td>
<td>H02 (Settlement Boundary)</td>
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<tr>
<td>258/002</td>
<td>Hannick Homes &amp; Developments Ltd</td>
<td>H01 (Omission Site)</td>
</tr>
</tbody>
</table>
Issue

Should this site be included within the settlement boundary and allocated for a mixed use development?

Reasoning and conclusions

52.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Rangeworthy is a very small village with a very limited range of local services. It has no shops. There is a very skeletal bus service. It is a relatively isolated village with occupants of new housing here likely to be very reliant upon the private car, having to travel to Thornbury or Yate, or further afield, for almost all of their daily needs.

52.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. Nor is there a shortfall of employment land that might warrant the identification of further employment sites. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Rangeworthy. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

52.3 The objection site is an extensive one focussed around a farm and its associated farm buildings. Although the site is not unduly prominent in the landscape it is not a proposal I can support. The village has a very poor range of facilities and, at best, only a very modest bus service. Because of its location it is likely that development in this area would be very much dependent on the motor car. There is no support in national, regional or strategic guidance for allocating land on the edge of this village. Development on this site would be quite out of scale with the existing settlement. Allowing development here would unacceptably conflict with the plan's strategy for a sustainable pattern of development. Whilst there may be some benefit in replacing the existing farm buildings, I do not consider that this outweighs the strong sustainability arguments that weigh heavily against extending the extent of the village and allowing for development here.

Recommendation

52.4 I recommend that no modification be made to the local plan.

53. Rangeworthy - New Road

Objections

<table>
<thead>
<tr>
<th>Objection Number</th>
<th>Name</th>
<th>Role</th>
<th>Note</th>
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<tr>
<td>178/001</td>
<td>Stuart Howes Esq</td>
<td>H01 (Omission Site)</td>
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<td>178/002</td>
<td>Stuart Howes Esq</td>
<td>H02 (Settlement Boundary)</td>
<td></td>
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</tbody>
</table>

Issue

Should this land be included within the settlement boundary and all or part of it allocated for housing?
Reasoning and conclusions

53.1 I have concluded in the previous item that Rangeworthy is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to enlarge the settlement boundary, nor to allocate additional housing sites. Here the objectors are seeking an allocation of an area of farmland for housing in association with the development of the proposed primary school, subject of allocation under policy LC2. The site wraps around the school site and the opportunity would be presented to develop the two parts in a comprehensive manner. However, that is not reason to allow the housing in the face of the strong strategic arguments against. Whilst the housing might act as enabling development to assist the progression of the school proposal, I have no evidence before me that the school is dependent upon such an approach. I cannot give this, nor the suggestion of associated community facilities, material weight.

Recommendation

53.2 I recommend that no modification be made to the local plan.

54. Redwick - Redwick Road

Objections

<table>
<thead>
<tr>
<th>Objection</th>
<th>Objector</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>95/002</td>
<td>Municipal Housing Corporation</td>
<td>H02 (Settlement Boundary)</td>
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<tr>
<td>355/001</td>
<td>Messrs D &amp; E England</td>
<td>H02 (Settlement Boundary)</td>
</tr>
</tbody>
</table>

Issue

Should the plan show the settlement boundary unchanged from the RALP?

Reasoning and conclusions

54.1 The council accepts that the boundary was inadvertently changed in the deposit draft plan from that shown in the previous RALP. The revised deposit plan corrects this error. The Municipal Housing Corporation also makes the suggestion that a further minor alteration would be appropriate to ensure the provision of some additional affordable housing units. I have insufficient information to comment on this further and whether this would justify the extension of the settlement boundary.

Recommendation

54.2 I recommend that no modification be made to the local plan.

55. Severn Beach

Objection

<table>
<thead>
<tr>
<th>Objection</th>
<th>Objector</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>351/003</td>
<td>Seven Owners of Land near Severn Beach</td>
<td>H01 (Omission Site)</td>
</tr>
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</table>

Issue

Is Severn Beach an appropriate location for further development?

Reasoning and conclusions

55.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the
rural settlements for further development. Severn Beach is a large settlement, lying only a short distance to the north of the Severnside industrial area and land subject to planning consent for major employment development. Otherwise, the village is relatively remote from the main urban areas. It is quite well served by local facilities, with a school and a range of shops and the large employment area to the south. Most notably, the village has its own railway station linking the village to Bristol.

55.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within village locations such as here. The presence of a railway station and the nearby employment area lifts the village someway above almost all other villages in terms of the sustainability of the location for further development. Train services to Bristol are approximately hourly, with no service on Sundays. Whilst the station is a plus factor for the village, I do not consider that the level of service, with that provided by bus services, is so good as to cause me to treat the settlement as being on par with any of the urban areas.

55.3 The village lies within the defined Avonmouth/Severnside policy area subject of policy 14 of the JRSP. Neither that policy, nor the JRSP locational strategy, proposes residential development at Severnside of a strategic scale. That does not rule out some development. However, of first choice in the local plan strategy is development in and around the main urban area of Bristol. Next comes Yate, which is by far the second largest area. Then comes Thornbury, with Severn Beach, to my mind, coming next, but some way behind the others in terms of locational sustainability.

55.4 I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in Severn Beach. It is evident that there has been considerable development here in recent years, the position having been reached that there is little prospect of further significant development within the defined settlement boundary. There does still remain the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that in the context of the plan’s strategy, this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

55.5 The council proposes to include the village and the surrounding area within the green belt, by way of policy GB3. For the reason I give in that section of my report I do not support the extension of the green belt over this area. That does not mean that over the remaining years of this plan period that I support further development here. Rather, the decisions to be made about the long term future of this area should not be pre-judged by the early inclusion of this area within the green belt. At the same time, I do not find that there is a compelling case to develop in this area, contrary to the current plan’s strategy.

55.6 A second major consideration in regard to Severn Beach is the question of flood risk. Severn Beach and the wider area lie within the area shown on the Environment Agency’s indicative maps as being at risk from tidal inundation. These adopt a 1 in 100 years event for flooding from rivers and a 1 in 200 years event for tidal flooding. The council’s defined Coastal Zone, subject of policy L4, approximates to the EA’s indicative map of tidal floodplain. Policy L4 indicates that development within the undeveloped coastal zone will only be permitted where the proposal requires a coastal location and cannot be accommodated elsewhere. This reflects the precautionary approach advocated in PPG25. Severn Beach lies within Zone 3, high risk. Whilst the existing settlement would fall within zone 3a, being a developed area, the undeveloped areas outside the settlement boundary lie within zones 3b and/or 3c.
55.7 Existing flood defences along the Severn Estuary are only 1 to 100 year flood standard and so fall short of the 1 to 200 year standard sought. Paragraph 55 of the PPG indicates that plans should not provide for development in undeveloped high-risk areas, such as this, that are not currently protected to an appropriate standard unless that location is essential for the particular development or there are no alternative locations in lower risk areas. Given that there are many areas within or adjoining the main urban areas that are not subject to tidal or river flooding risk, the precautionary approach weighs heavily against seeking allocations around Severn Beach.

55.8 The issue of flooding would need to be addressed if any sites are promoted for development. However, bearing in mind the sequential approach to the selection of sites in respect of flooding issues, I do not consider that a piecemeal approach argued on a site-by-site basis represents the best way forward in this area. I have commented elsewhere in my report, in chapter 2, about longer-term development of the Severnside area. It may well be that in the future there is a strategic impetus to achieve significant development in the wider area. If there is further significant development, then it would not appear unreasonable to assume that the existing village with its range of services and station, could provide a focus around which some further development might take place. If that scenario comes to fruition, then there would be a need to tackle in a comprehensive manner the achievement of suitable flood protection measures across a wide area that would enable this to happen.

55.9 This objection relates to a large area of land adjoining the railway line. It is bounded to the south by the M49 motorway which forms a significant barrier, separating the site from the village. It would not form a natural extension of the village. Even if some development were to be appropriate for Severn Beach I do not consider that this site would offer the best option available. For all these reasons I do not support the objection.

Recommendation

55.10 I recommend that no modification be made to the local plan.

56. Severn Beach - East of Gorse Cover Road

Objection

<table>
<thead>
<tr>
<th>Objection Number</th>
<th>Developer</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>417/008</td>
<td>Wimpey Homes Holdings Ltd</td>
<td>H02</td>
</tr>
<tr>
<td>417/009</td>
<td>Wimpey Homes Holdings Ltd</td>
<td>H01</td>
</tr>
</tbody>
</table>

Issue

Should the settlement boundary be altered to include this site within the village and should the land be allocated for housing?

Reasoning and conclusions

56.1 In the previous item I have set out my conclusions on the merits of Severn Beach as a sustainable location for development. In essence, whilst I acknowledge the relative sustainability of the village over other villages in the district, I do not support the extension of the existing settlement boundary or the allocation of sites for housing in Severn Beach. In my view the housing requirement can be achieved in more sustainable locations than here. There are also very considerable flooding concerns that would need to be overcome before further sites could be identified, if the need were shown.

56.2 The objection site is well contained by existing development and a road. It extends to about 5.6 hectares and would be capable of accommodating upwards of 170 dwellings at PPG3 densities. This represents a significant addition to this village. For the reasons I give
in the previous item I do not support the extension of the settlement boundary nor the allocation of sites such as this. As regards the potential for a larger and more strategic growth option for Severn Beach as a whole I leave that for the next round of plans to consider.

**Recommendation**

56.3 I recommend that no modification be made to the local plan.

---

**57. Severn Beach - East of Gypsies Plat**

**Objection**

92/004 Banner Homes Ltd H01 (Omission Site)

**Issue**

Should land be allocated for housing?

**Reasoning and conclusions**

57.1 In item 55 above I have set out my conclusions on the merits of Severn Beach as a sustainable location for development. In essence, whilst I acknowledge the relative sustainability of the village over other villages in the district, I do not support the extension of the existing settlement boundary or the allocation of sites for housing in Severn Beach. In my view the housing requirement can be achieved in more sustainable locations than here. There are also very considerable flooding concerns that would need to be overcome before further sites could be identified, if the need were shown.

57.2 The objection site comprises a number of fields outside the village, separated from it by an area of unkempt ground. The M49 and Severn Road provide a clear boundary to the east and south. It extends to about 8.5 hectares and would be capable of accommodating upwards of 250 dwellings at PPG3 densities. This represents a significant addition to this village. I accept the advantages offered by the close presence of a considerable employment area, but in the absence of a clear strategic imperative to provide for housing in this area I do not consider that this justifies the allocation of sites for more housing. For the reasons I give here and in item 55 above I do not support the allocation of sites such as this. As regards the identification of Severn Beach as a strategic location for major growth I leave that for the next round of plans to consider.

**Recommendation**

57.3 I recommend that no modification be made to the local plan.

---

**58. Severn Beach - Gypsies Plat**

**Objection**

437/018 Barratt Bristol H01 (Omission Site)
437/020 Barratt Bristol H02 (Settlement Boundary)

**Issue**

Should the site be included within the settlement boundary and should the land be allocated for housing?
Reasoning and conclusions

58.1 In item 55 above I have set out my conclusions on the merits of Severn Beach as a sustainable location for development. In essence, whilst I acknowledge the relative sustainability of the village over other villages in the district, I do not support the extension of the existing settlement boundary or the allocation of sites for housing in Severn Beach. In my view the housing requirement can be achieved in more sustainable locations than here. There are also very considerable flooding concerns that would need to be overcome before further sites could be identified, if the need were shown.

58.2 The objection site comprises an area of unkempt ground between the village and the track known as Gypsies Plat. It is well related to the existing settlement and is well contained. It appears of sufficient size as to accommodate upwards of 200 dwellings at PPG3 densities. This represents a significant addition to this village. It currently is designated as a SNCI. If a development need of this scale were to be identified then I have no doubt that this would be one of a number of peripheral sites that would need to be considered. I accept the advantages offered by the village, including the close presence of a considerable employment area, but in the absence of a clear strategic imperative to provide for housing in this area I do not consider that this justifies the allocation of sites for more housing. For the reasons I give here and in item 55 above I do not support the allocation of sites such as this.

Recommendation

58.3 I recommend that no modification be made to the local plan.

59. Severn Beach - Land at Ableton Way

Objection

96/003 Downend Estates Ltd H01 (Omission Site)
96/004 Downend Estates Ltd H02 (Settlement Boundary)

Issue

Should the site be included within the settlement boundary and should the land be allocated for housing?

Reasoning and conclusions

59.1 In item 55 above I have set out my conclusions on the merits of Severn Beach as a sustainable location for development. In essence, whilst I acknowledge the relative sustainability of the village over other villages in the district, I do not support the extension of the existing settlement boundary or the allocation of sites for housing in Severn Beach. In my view the housing requirement can be achieved in more sustainable locations than here. I note the comments made about the scale of employment development potential in this area and that development of housing here, on a site close by the major employment area and the PUA, would improve the balance. However, this does not overcome the strategic objection to development around the village. There are better locations for development to meet the district's needs.

59.2 The objection site comprises an area of fields and paddocks with well established hedgerows, at the south western edge of the village. It is well related to the existing settlement and is well contained. It extends to about 9 hectares and would be able to accommodate upwards of 270 dwellings at PPG3 densities. This represents a significant addition to this village. Development has taken place recently at a high level, but there is no clear reason why it should continue at that rate now that land within the settlement...
boundary has largely been taken up. If a development need of this scale were to be identified then I have no doubt that this would be one of the sites that would need to be considered. I note the views expressed about the ecological importance of the site in respect of the habitat provided for the curlew. This appears to relate to part of the site only. It clearly is an issue that would need to be revisited if the strategic justification were established for an expansion of the village. Likewise, I accept that this site does have a visual relationship to the estuary, that it provides an open, undeveloped setting at this point along the Severn. Again, this is a matter, though not decisive in itself, that weighs against the site coming forward for development.

59.3 As regards flooding, the evidence is that the area lies within a 1 in 200 year zone of risk, with defences providing only a 1 in 100 year level of protection. It lies within a Zone 3c area, part of the functional flood plain. Accordingly, it is reasonable to assume that development here would be inappropriate. However, a detailed flood risk assessment has been carried out by the objectors which indicates that this area is the best protected cell in the Severnside area. This study indicates that the standard of defence in this area is in excess of 1 in 200 years, due to the formal sea defence wall in front of Severn Beach and informal defences provided by road embankments inland which prevent flooding from the east.

59.4 The Environment Agency does not address the details of this study. It repeats its view that the tidal defences do not provide protection beyond the 1 to 100 year standard. It goes on to draw attention to the in-principle position that the site lies within a Zone 3 area, the site is greenfield and that guidance is clear in seeking to avoid introducing built development where such areas are subject to flood risk. I have no reason to doubt the findings of the study carried out and the objector's conclusions that, subject to certain site works and land raising, development here would remain functional in the 1 to 200 year sea defence failure. In other words, the risk is capable of management. However, that misses the point that there are alternative sites available with lesser or no flood risk that can provide the sites to meet the housing requirements, in sustainable locations, without building on land that by definition carries a risk. The precautionary approach is intended to avoid unnecessarily building on land that carries a risk. It is better to avoid development on land that would always require protection from flooding, unless there is good reason why it should take place.

59.5 I accept the advantages offered by the village, including the close presence of a considerable employment area, but in the absence of a clear strategic imperative to provide for housing in this area I do not consider that this justifies the allocation of sites for more housing, whether this be the whole site, part of this site or merely the extension of the settlement boundary to cover this land. For the reasons I give here and in item 55 above I do not support the allocation of sites such as this.

Recommendation

59.6 I recommend that no modification be made to the local plan.

60. Severn Beach - Little Green Lane

Objections

<table>
<thead>
<tr>
<th>Ref</th>
<th>Objections</th>
<th>Site Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>31/003</td>
<td>Representatives of E.A.C. Ball (Deceased)</td>
<td>H01 (Omission Site)</td>
</tr>
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<td>31/004</td>
<td>Representatives of E.A.C. Ball (Deceased)</td>
<td>H02 (Settlement Boundary)</td>
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<tr>
<td>32/003</td>
<td>J R &amp; P Willcox</td>
<td>H01 (Omission Site)</td>
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<td>J R &amp; P Willcox</td>
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<td>183/001</td>
<td>Mr L T Liddiatt</td>
<td>H01 (Omission Site)</td>
</tr>
<tr>
<td>183/003</td>
<td>Mr L T Liddiatt</td>
<td>H02 (Settlement Boundary)</td>
</tr>
</tbody>
</table>
Issue
Should the settlement boundary be altered to include land in this area within the village and should the land be allocated for housing?

Reasoning and conclusions
60.1 In item 55 above I have set out my conclusions on the merits of Severn Beach as a sustainable location for development. In essence, whilst I acknowledge the relative sustainability of the village over other villages in the district, I do not support the extension of the existing settlement boundary or the allocation of sites for housing in Severn Beach. In my view the housing requirement can be achieved in more sustainable locations than here. There are also very considerable flooding concerns that would need to be overcome before further sites could be identified, if the need were shown.

60.2 These objections relate to land subject of objection by Wimpey Homes, referred to in item 56 above, and/or to parts or all of the land to the east of Little Green Lane. This land adjoins the village and is well contained by the M49. It would be capable, in total, of accommodating upwards of several hundred dwellings at PPG3 densities. This represents a very significant addition to this village. For the reasons I give in item 55 above I do not support the extension of the settlement boundary nor the allocation of sites such as this. As regards the potential for a larger and more strategic growth option for Severn Beach as a whole I leave that for the next round of plans to consider.

Recommendation
60.3 I recommend that no modification be made to the local plan.

61. Severnside - Whitehouse Farm

Objection
393/004 Brisden Properties H01 (Omission Site)

Issue
Should this site be allocated for housing?

Reasoning and conclusions
61.1 In item 55 above I have set out my conclusions on the merits of Severn Beach as a sustainable location for development. In essence, whilst I acknowledge the relative sustainability of the village over other villages in the district, I do not support the extension of the existing settlement boundary or the allocation of sites for housing in Severn Beach. In my view the housing requirement can be achieved in more sustainable locations than here. There are also very considerable flooding concerns that would need to be overcome before further sites could be identified, if the need were shown.

61.2 These objections relate to a very extensive area of land lying between the villages of Severn Beach and Pilning. At PPG3 densities this land would be expected to accommodate upwards of 1,800 dwellings, a considerable expansion of these settlements, equivalent to the establishment of a new settlement. Such a proposal was not supported by the Panel examining the JRSP and the JRSP provides no strategic basis for establishing development here on this scale. It will be for subsequent plans to consider the possibility of large scale development in the Severnside area.
Recommendation

61.3 I recommend that no modification be made to the local plan.

62. Siston - Goose Acre

Objection

| 357/002 | Mr R J Bendry | H02 (Settlement Boundary) |

This site is considered in chapter 5 of my report, under item 21

63. Siston - Land at Siston Common

Objection

| 313/012 | Matchmove Ltd | H01 (Omission Site) |

Issue

Should this site be allocated for housing?

Reasoning and conclusions

63.1 The objection site was defined on an old map base. In effect, it relates to an area of about a hectare, comprising open land bounded by the embankment of the Ring Road roundabout and the rear of houses facing Siston Common. Together with the open land to the south it forms a bowl of open ground rising behind the houses up to the road embankment and its associated cycleway. Its upper parts are elevated and provide for views across the residential area to the west.

63.2 The field to the south is subject to a local nature conservation designation. Together, the higher parts of this land are prominent and provide an attractive feature, adding to the sense of openness created by the Common and other open areas of land alongside the Ring Road corridor. To develop up the sides of this bowl would diminish the character and appearance of this part of the urban area.

63.3 In terms of the sequential search for sites I have concluded elsewhere that open land within the PUA should be given priority over extending the urban area. Given my conclusions on the level of housing land required I support the principle of developing suitable sites, whether greenfield or previously developed that are within the PUA. However, in respect of this site I consider that it makes a significant contribution to the character of this area and that its development would cause unacceptable harm to that contribution. For that reason I do not support the identification of the site for housing.

Recommendation

63.4 I recommend that no modification be made to the local plan.

64. Stoke Gifford - 22 The Green

Objection

| 343/014 | Hallam Land Management Ltd | H01 (Omission Site) |
Issue

Should this site be allocated for housing?

Reasoning and conclusions

64.1 This site lies within the built-up area, close to Parkway station. 0.4 hectares in extent, it contains a number of commercial buildings and is currently in use for commercial purposes. Whilst it is clearly a previously developed site and in a sustainable location, I agree with the council that it would not be appropriate to allocate for housing. The local plan adopts the cut-off point for allocating sites at 0.5 hectares. Going below that could create unnecessary difficulties. The plan does, however, provide the basis for determining any applications for residential development of employment sites through a range of policies, most notably policies H2 and E3. In these circumstance I conclude that no allocation of this site should be made.

Recommendation

64.2 I recommend that no modification be made to the local plan.

65. Stoke Gifford - Hambrook Lane

Objections

186/001 Mr G Mason H02 (Settlement Boundary)
389/001 Mr & Mrs Nash H01 (Omission Site)
389/002 Mr & Mrs Nash H02 (Settlement Boundary)

This site is considered in chapter 5 of my report, under item 22

66. Stoke Gifford - Harry Stoke

Objections

49/012 Crest Nicholson Properties Ltd & ICP Properties Ltd H01 (Omission Site)
49/018 Crest Nicholson Properties Ltd & ICP Properties Ltd H01 (Omission Site)
132/002 St Michaels Parish Church H01 (Omission Site)

Issue

Should this site be allocated for development within the plan period?

Reasoning and conclusions

66.1 This site is the subject of policy GB4, which safeguards it for development beyond the plan period, reflecting the guidance in PPG2 regarding the safeguarding of land between the urban area and the inner boundary of the green belt. The council does not take issue with the site's suitability for development, but considers that in the current circumstances it will not be needed to meet the strategic requirement for housing in the plan period. I accept the basic premise that the site is a sustainable one and is appropriate for development. The key question to be answered is, in the context of the identified housing requirement, how does this site perform compared with other allocated and potential sites in terms of the sequential approach and the plan's locational strategy?

66.2 The objector's concept plan envisages 1,200 dwellings, a primary school, some employment/mixed development, access to a P&R site, facilitation of the construction of the southern section of the former Winterbourne Bypass to complete the link between Bradley...
Stoke and the Avon Ring Road and a further link to Great Stoke Way, land provision for the LRT route, enhanced bus linkage through the site.

66.3 I have concluded that there is a requirement for the identification of land to provide a further 5,981 dwellings. This is substantially in excess of my estimation of the total capacity of the plan's identified allocations. In my view there is a need to identify a significant level of additional land to meet the housing land needs. Even if I am wrong in this, there is still the question of whether this site is more appropriate for development than some of those allocated in the plan.

66.4 Harry Stoke lies at the eastern edge of the North Fringe, between the built-up edge of the conurbation and the green belt. It lies very close to major employers including the MoD, UWE, Hewlett Packard and Axa/Sun Life. It also lies close to a retail park, including a Sainsbury's store and to Parkway main line station. To my mind it is an extremely well located site, one that would be able to benefit from an excellent range of facilities, services and job opportunities close by. It also has significant advantages of being close to Parkway Station, a major transportation interchange and to two bus interchanges. The site can be designed to accommodate the successor of the LRT system and other bus services to link it with the surrounding areas.

66.5 As I have said before, the council did not prepare a coherent or comprehensive sustainability assessment on a site by site basis. Thus, it is very difficult to come to firm conclusions on sites on any comparative or individual basis. Various views have been advanced on the sustainability of this and other sites, some backed by detailed analysis, others more based on assertion. Detailed technical assessments can hide a multitude of assumptions. I do not believe that I am in a position myself to undertake a detailed, forensic examination of all the aspects for each site. Of necessity, I have looked at this site and others on a fairly pragmatic basis, taking a fairly broad-brushed approach.

66.6 As regards its place in a sequential approach compared with the nearby large allocations, I place Northfield, as a previously developed site, first. In that sense it is in a standing all of its own. The Hewlett Packard and Coldharbour Lane sites are also in the PUA, in the North Fringe. The Hewlett Packard site and Northfield both help to meet the thrust of the guidance in policy 12 of the JRSP, in re-structuring the North Fringe. I do not see the loss of previously allocated employment land as being a disadvantage. On the contrary, those re-allocations for housing are helping to enact the important aim of restructuring the North Fringe.

66.7 Hewlett Packard, Wallscourt Farm, although perhaps not quite as well situated as the Harry Stoke site does have many advantages of its own. Although not close to Parkway station it is not too far from UWE and its bus interchange, which can be reached without crossing the Ring Road. It also adjoins the LRT route, would benefit from the Romney Avenue bus link, the Filton Abbey Wood station and close proximity to major employers. Coldharbour Lane is close to UWE and its bus interchange and to other employment opportunities. Of some material weight in the choice of sites is that Coldharbour Lane helps to create, with Hewlett Packard and the existing Stoke Park development, the critical mass necessary to provide a primary school for the area. Taking all considerations into account I find that there is very little to choose between Harry Stoke and these two other North Fringe sites. Perhaps, having regard to all considerations it should be placed marginally below those sites, because of their respective roles in restructuring the area and helping to provide facilities for an area that lacks them.

66.8 As regards any comparison with Embrsions Green East, I am of the opinion that in sustainability terms the Harry Stoke site is superior. Embrsions Green East is less well placed to benefit from close ties with the jobs, facilities and services available in the existing built-up areas of the conurbation and is less well placed in terms of train and bus services. The
principal argument in favour of Emersons Green East is its strategic role and that, in this context it will complete the development of that area. In my view the relative difference in their respective sustainability is not so great as to justify placing Harry Stoke above Emersons Green East.

66.9 As regards other sites outside the PUA, including those advanced by objectors at Yate and Thornbury, I have no doubt in my mind that Harry Stoke is a substantially superior location, with a much wider range of jobs, services and facilities on its doorstep and much better existing and potential range of public transport services.

66.10 In establishing the merits of the Harry Stoke site I place little weight on many of the suggested transport benefits. Access to a possible P&R site could be a benefit, but is not critical to such a scheme proceeding. Likewise the provision of a route for the LRT or its successor is not dependent upon the developers voluntarily making it available. If a fixed route is needed then the council could proceed by other means. Alternatively, an improved bus link would need to be developed within the context of the overall network and available road space or other opportunities.

66.11 As regards the facilitating of road improvements, I find these superficially of some attraction. They could go a long way towards relieving existing traffic problems in the vicinity of Parkway Station. However, there must be some real concern about supporting road schemes in this area if they were to increase car usage generally or add to traffic and congestion on the main routes, particularly the Ring Road, through the area. Any decision on this would have to wait on further studies. Possible safeguarding of the line and/or provision of any route and of any LRT or its replacement would best be considered in the light of any further information at the time of the planning application. I do not consider that I can give support to any specific road proposal at the current time and in consequence I can give no material weight to this matter in my consideration of making this site available now.

66.12 The North Bristol NHS Trust raises objection to the release of this safeguarded land, as its release for development would prejudice the possibility of developing the site for a new NHS acute hospital. The Trust is currently considering three possible options for the development of a new hospital. These three all relate to existing hospital sites. No greenfield site has been shortlisted in the public consultations. However, the Trust indicates that the public consultation exercise will leave open the opportunity for consultees to suggest an alternative option to those shortlisted. If the consultees feel strongly that a greenfield site would be more beneficial, then the Trust has identified Harry Stoke as the preferred site.

66.13 In the council’s view the level of uncertainty about the Trust’s plans is such that the Trust’s objection will not add significant weight to its own objection. I agree. There is no contractual link between the Trust and this site. It seems to me that the Trust has not shown that there is a realistic possibility of a need for a green field site, nor that Harry Stoke is necessarily the only or best site available. In any event, if I recommend that the site be released now for housing, the Trust would have a further opportunity to make representations next year, after the completion of the consultation exercise. For these reasons I do not consider that the considerations relating to a new acute hospital justifies the continued safeguarding of this site.

66.14 In conclusion, I find that the Harry Stoke site has substantial merits. It is suitable for a housing development. I have no doubt that it stands considerably above those large sites being proposed by objectors on the edges of Yate and Thornbury. Its merits are recognised in the plan, in policy GB4. Its allocation would not involve the rolling back of the green belt boundary. In my view the site is the most suited of all the sites advanced by objectors to this local plan. That said, I do not find that, in sequential terms it should be progressed before the plan’s allocations in the North Fringe nor the strategic Emersons Green East site. However, arguments as to the precise position in any sequential approach comparative to
the plan's allocations are fairly academic in view of my conclusions as to the overall level of the housing requirement for the area. On this basis this site is needed as well as the plan’s allocations, in policy H1(A). For these reasons I support the addition of this site to the list of housing allocations in policy H1(A).

66.15 My one reservation is that events may show my cautious approach to the ability of the larger sites to deliver housing may be shown to be unduly conservative. There is a possibility of the addition of this site, together with Emersons Green East site and the enlargement of the Hewlett Packard site, would result in a significant delivery of housing above the requirement I have identified. If this was the case, then there might be some merit in applying some form of programming to this site, to delay its start until such time as it can be shown that it is needed.

66.16 I do not, however, believe that it is necessary or desirable to do so. Firstly, there is little time left in the plan period to operate a meaningful phasing approach. By the time that it became clear that there was a need to start this site there would be little time for it to come on stream and make a meaningful delivery. Secondly, an over-provision of housing compared with my identified requirement would not of itself be a problem. This plan will need to be reviewed before its expiry in 2011. If adjustments are needed then they can be brought forward as part of that process to cover the remaining years to 2011 and the plan period beyond.

66.17 I am content with a cautious approach to actual delivery, on the basis that progress in practice very rarely seems to reflect theoretical programmes. So often there will be delays where none had been anticipated. Indeed, many of the various suggested programmes of housing delivery for the larger sites that were put forward prior to or at the start of this inquiry have already been shown to be over-optimistic. Thus, I do not recommend that the site be subject to some form of phasing. However, I am not convinced that a total of 1,200 dwellings could be provided on this site by 2011. There is still a great deal to be sorted out before a start could be made on site. I think that it would be more prudent in terms of housing land supply to assume that about 900 dwellings could be provided by 2011. Having said that, the figure of 900 should not be taken as a ceiling figure for the period to 2011.

**Recommendation**

66.18 I recommend that the local plan be modified by the addition of this site to Policy H1(A), to provide a development of 1,200 dwellings, 900 of which are likely to be completed by 2011, together with associated infrastructure and ancillary uses.

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### 67. Stoke Gifford - Land at Mulgrove Farm

**Objections**

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*This site is considered in chapter 5 of my report, under item 23*

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### 68. Thornbury - Bristol Road

**Objection**

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<td>Persimmon Homes</td>
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69. Thornbury - Morton Way/Old Gloucester Road

Objections

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<td>Mr and Mrs D Hopkins</td>
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<td>432/001</td>
<td>Ms E Brady</td>
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Issues

- Should sites be identified in Thornbury for development?
- Is this a sustainable site for development?
- Is the site suitable for development?

Reasoning and conclusions

69.1 The original objections related to an extensive area of about 54 hectares on the north east edge of Thornbury. This was proposed for a mixed development of about 1,000 dwellings and 10 hectares of employment, to be developed over 2 plan periods. Subsequent representations refer to a smaller area of about 28 hectares, land more closely related to the existing edge of the town along Morton Way. This would contain a mix of housing, employment, retail, education and community related uses, though no further details are given.

Thornbury

69.2 I have commented generally in chapter 2 of my report on the locational strategy as it relates to Thornbury. I have also commented on this issue in relation to other sites advanced for Thornbury. In brief, I do not consider that this plan should include allocations in the town. The plan concentrates allocations within and on the edge of the PUA. A significant proportion of overall housing provision will continue to come forward within the built-up settlements in the district. Thornbury can continue to fulfil its role in serving local needs and making services available to the wider rural area. I see no conflict with the regional policies, in particular SS7 or SS19, or strategic guidance in this respect.

69.3 It is not the role of the local plan to work on the basis of a predict and provide for each settlement individually. I have no reason to question that there is a strong local requirement for affordable housing. I accept too that there is a continuing sustained demand for housing in the town. However, the role of the local plan is not to simply provide housing where there
is shown to be a demand. The locational spread of housing should reflect national, regional and strategic guidance. For the reasons I give in chapter 2 of my report and elsewhere in this chapter, I do not consider that sites should be allocated for development in this town. No policies identify Thornbury specifically for additional development by way of allocations. I recommend a higher housing requirement than the plan, but am satisfied that this can be achieved by concentrating allocations in and around the PUA, reflecting the thrust of national, RPG and JRSP locational preferences.

69.4 About one third of those that live in the town are employed locally. The evidence dating back to 1991 is that nearly 40% work in Bristol city centre or the North Fringe, a figure likely to be higher today. 2001 travel mode information shows that there is currently a very low percentage using buses and a high level of dependency on the car. The proposals are for mixed development and could be self-contained in the sense of providing for an approximate balance between homes and jobs. This is the very least that could be expected, but does nothing to diminish the perceived imbalance that marks the town as being dependent upon outside, more distant areas for employment for the majority of its residents. Most workers have to leave the town for their work and do so very predominantly by private car. The town is well placed in relation to the motorway system. There is no railway station and bus services are scarcely adequate at best and not very attractive to those working in Bristol city centre or across the North Fringe. The evidence suggests a sizeable increase in peak hour traffic flows southwards on the A38.

Site sustainability

69.5 In terms of accessibility to facilities and services in the town, the site is a peripheral one. Whilst some facilities are within reasonable reach, others are at the upper end or beyond appropriate distances for pedestrians and cyclists. In particular, the site is not well located for pedestrians wishing to walk to a range of local facilities. The core of the town centre is about 20 minutes walk away, well above the desired maximum walking distance set out in Table 1 of RPG10.

69.6 Relatively limited bus services are available in the town. These could, potentially, be enhanced to serve the site, though I have some misgivings about the size of the development and the achievement of a critical mass to support, in the long term, real, viable improvements to these services. Main bus routes would need to be diverted or secondary connection time would remain a disincentive. This diversion in itself could make them less attractive overall. Fairly long journey times would remain for those travelling to the city centre or the North Fringe.

69.7 JRSP policy 4 identifies the corridor to Thornbury as one of those for improvements to maximise travel alternatives to the car. The A38, to the south of the M5, is the subject of Quality Bus Corridor measures. Implementation of a series of associated measures will help to improve the flow of buses through the more congested stretches of the A38 and so have a beneficial impact on the attractiveness of bus routes southwards from Thornbury. However, improvements to the flow of buses along the A38 north of the M5 are less certain.

69.8 I accept that the town offers a reasonably good range of facilities and services, reasonably accessible. However, for choice and a higher order of facilities it would have less to offer. It falls short in terms of the number and range and choice employment opportunities and would be likely to generate increased commuting along the A38, primarily to Bristol and the North Fringe, with little chance of short work based trips. Even with a park and ride scheme the modal shift that would be achieved would be quite slight and not alter the basic premise that development here would significantly add to traffic commuting southwards towards Bristol.
69.9 Although improvements to public transport services are advanced by the objector, it seems to me that the option of concentrating development within and on the edge of the main urban area of Bristol offers the best chance of improving the prospects for improving existing and establishing new viable public transport services.

Site suitability

69.10 As regards this site, I am of the view that of the omission sites advanced by objectors this site is more attractive for development than those promoted to the north west and south west of the town, were the need established, though less so than that at the south east fringe of the town, considered below. Although not small in scale it is not inappropriate given the size of the town. Although not close to the town centre nor the secondary school, it is not that remote. The land is probably at the lower end of the scale of agricultural land quality that could be available around the town for development. It is not constrained by green belt designation. It immediately adjoins a rather harsh and abrupt edge of the town. It would spread the town north eastwards into a generally open landscape.

69.11 The site is not particularly well contained by the local topography and would spread development out into the gently undulating topography. As such, it would increase the sprawl of development and would fundamentally change the appearance of this edge of the town. That said, I do not consider that it would seriously harm the longer views of the town and its bowl-like setting. With built development wrapped around the arc of Morton Way, I believe that development here would not seriously harm the setting of the town. I do not consider that this provides reason on its own not to support the allocation of this site.

69.12 In the limited evidence available to me there do not appear to be other insuperable difficulties that would constrain the development of this site. The presence of nearby listed buildings would have to be taken into account in the production of any detailed scheme, as would any particular ecological interest.

69.13 In conclusion, I do not find that it is necessary for the achievement of the housing land requirement or the underlying strategies of the RPG or JRSP for sites to be identified around Thornbury. Of all the omission sites around Thornbury before me I find this one not unsuitable. However, I do not consider that the opportunities for using modes of transport other than the car are so good as to override the strategic considerations. Development here would be unlikely to offer the same degree of opportunity for developing sustainable forms of transport than sites within or on the edge of the main urban area. Increased commuting flows along the A38 would result, with additional pressure on junction 16 of the M5. I am not convinced that the measures are in place to maximise the attractiveness of public transport in this area and so reduce reliance on the car. For all these reasons I do not support the allocation of this site as either an alternative or additional mixed development site.

Recommendation

69.14 I recommend that no modification be made to the local plan.

70. Thornbury - Morton Way

Objection

194/007 Countryside Strategic Projects Plc H01 (Omission Site)
Support

211/001 Mr & Mrs P M Hardaker H01 (Omission Site)
212/001 Mr & Mrs P P Benson H01 (Omission Site)
213/001 Mr & Mrs B C Jenkins H01 (Omission Site)
214/001 Mr & Mrs M J Craig H01 (Omission Site)
215/001 Mr R Perrin H01 (Omission Site)
216/001 Mr & Mrs M J Blackburn H01 (Omission Site)
272/001 Dr J Gumb H02 (Settlement Boundary)
376/001 Mr & Mrs R S Heath H02 (Settlement Boundary)
377/001 Mr C Hall H02 (Settlement Boundary)
307/001 Mr and Mrs RC Black H01 (Omission site)
308/001 Dr and Mrs PA Marshall H01 (Omission site)
311/001 Mr and Mrs MG Duckley H01 (Omission site)
346/001 Mr T Beswick H01 (Omission site)
400/001 Mr and Mrs CM Barrington H01 (Omission site)
401/001 Mr and Mrs D Hopkins H01 (Omission site)
432/001 Ms E Brady H01 (Omission site)

Issues

Should sites be identified in Thornbury for development?

Is this a sustainable site for development?

Is the site suitable for development?

Reasoning and conclusions

70.1 The objector originally sought the allocation of 24 hectares of land at Morton Way for a mixed use development comprising a minimum of 500 dwellings, at a minimum density of 40 dph, office and light industrial development on 2 hectares, a petrol filling station, a small retail unit, doctors surgery, chemist day nursery, pub/restaurant, nursing home and sheltered housing. A park and ride facility was also proposed on a 2 hectare site, on land outside the objection site, south west of Grovelands, although this could be accommodated on the objection site. Land on the eastern part of the site would be left undeveloped as informal open space and Crossways and Cleve Woods would be retained. A comprehensive network of footpaths and cycleways would link the site to its surroundings. Incorporating the park and ride on the site has lead to some minor changes to the package of proposals, the main ones being a reduction to 450 dwellings and a small increase in the employment area.

70.2 I have commented generally in chapter 2 of my report on the locational strategy as it relates to Thornbury. In brief, I do not consider that this plan should include allocations in the town. The plan concentrates allocations within and on the edge of the PUA. A significant proportion of overall housing provision will continue to come forward within the built-up settlements in the district. Thornbury can continue to fulfil its role in serving local needs and making services available to the wider rural area. I see no conflict with the regional policies, in particular SS7 or SS19, or strategic guidance in this respect.

70.3 The objector identifies a locally generated need in excess of 1,000 dwellings, based upon a zero net migration projection. These proposals fall well within that figure. Whilst not disagreeing with that figure, it is not the role of the local plan to work on the basis of a predict and provide for each settlement individually. I have no reason to question that there is a strong local requirement for affordable housing. I accept too that there is a continuing sustained demand for housing in the town. However, the role of the local plan is not to simply provide housing where there is shown to be a demand. The locational spread of housing should reflect national, regional and strategic guidance. For the reasons I give in chapter 2 of my report I do not consider that sites should be allocated for development in Thornbury.
this town. No policies identify Thornbury specifically for additional development by way of allocations. I recommend a higher housing requirement than the plan, but am satisfied that this can be achieved by concentrating allocations in and around the PUA, reflecting the thrust of national, RPG and JRSP locational preferences.

70.4 About one third of those that live in the town are employed locally. The evidence dating back to 1991 is that nearly 40% work in Bristol city centre or the North Fringe, a figure likely to be higher today. 2001 travel mode information shows that there is currently very low percentage using buses and a high level of dependency on the car. The proposals are self contained in the sense of providing for an approximate balance between homes and jobs. This is the very least that could be expected, but does nothing to diminish the perceived imbalance that marks the town as being dependent upon outside, more distant areas for employment for the majority of its residents. Most workers have to leave the town for their work and do so very predominantly by private car. The town is well placed in relation to the motorway system. There is no railway station and bus services are scarcely adequate at best and not very attractive to those working in Bristol city centre or across the North Fringe. The evidence suggests a sizeable increase in peak hour traffic flows southwards on the A38.

**Site sustainability**

70.5 In terms of accessibility to facilities and services in the town, the site is a peripheral one. Whilst some facilities are within reasonable reach, others, are at the upper end or beyond appropriate distances for pedestrians and cyclists. In particular, the site is not well located for pedestrians wishing to walk to a range of local facilities. The core of the town centre is about 20 minutes walk away, well above the desired maximum walking distance set out in Table 1 of RPG10. The primary school fails to meet the desired maximum distance for most of the site.

70.6 Bus services are available to serve the site and could, potentially, be enhanced as suggested by the objector, though I have some misgivings about the size of the development and the achievement of a critical mass to support, in the long term, real, viable improvements to these services. Main bus routes would need to be diverted or secondary connection time would remain a disincentive. This diversion in itself could make them less attractive overall. Fairly long journey times would remain for those travelling to the city centre or the North Fringe.

70.7 One significant feature of the objector's proposals is the provision of a park and ride facility on nearby land. The council has identified a potential MMI at Thornbury, though no detailed studies have been undertaken, as priority is being directed elsewhere. In my view, and in the absence of detailed evidence, there is some logic to the argument that this site is considerably superior to the possibility currently mentioned by the council, at the leisure centre. The objector's location would be able to pick up commuters travelling south on the A38 towards Bristol and would broadly fit in with the council's strategy for bus improvements.

70.8 However, I am reluctant to give much weight to this aspect at this time, as the success of any park and ride will depend upon how it fits into a wider strategy of provision. There is insufficient evidence of its viability. There may be a possibility of other ways of capturing car based commuters travelling south along the A38 that resulted in lower journey lengths and volume of travel. I do not have sufficient information before me to express a clear view on this. The council should look seriously at this as an option. JRSP policy 4 identifies the corridor to Thornbury as one of those for improvements to maximise travel alternatives to the car. The A38, to the south of the M5, is the subject of Quality Bus Corridor measures. Improvements to the flow of buses along the A38 north of the M5 are less certain. Implementation of a series of associated measures will help to improve the flow of buses
through the more congested stretches of the A38 and so have a beneficial impact on the attractiveness of bus routes southwards from Thornbury.

70.9 A very detailed comparative accessibility and sustainability assessment has been carried out for this site and three other locations, at Yate, Emersons Green and Northfield. This suggests that the Thornbury site is the most accessible to facilities in terms of likely travel patterns and that it is joint best, with Emersons Green, in terms of the sustainability score. I note the pedigree of the approach underlying this assessment and the criticisms made of it. I do not have the evidence to express conclusive views on the merits of this form of assessment against other forms. That said, I believe that it offers a useful starting point to the respective merits of individual sites. Certainly, the council has not undertaken such an exercise to inform and justify its selection of sites for allocation. The council has made a number of criticisms of the assessment, some of which are answered by the objectors.

70.10 In my view there remain a number of significant caveats to the use of such an assessment in choosing between sites. Firstly, as the evidence suggests, the assessments are underlain by a succession of assumptions. Whilst these are made on the most informed basis, small changes in assumptions can alter the conclusions reached. Secondly, the assessment does not seem to adequately deal with differences in the range and quality of provision. Like is not always being compared with like. This is likely to weigh against areas like the North Fringe, where there are a much wider and larger range and type of facility, than smaller, freestanding towns which are able to offer facilities of a lower order. Finally, any decision on choice of sites must include proper regard to the underlying strategy of the plan and the wider range of planning guidance, which themselves will have been underlain by the desire to create a sustainable pattern of development across the district.

70.11 I consider the comparative assessment should, therefore, be treated with a degree of caution. It is useful that it is based on an assessment of all trips made, not just work related trips. That is an advantage over those sustainability assessments based solely on journey to work. On the other hand, because work trips are likely to be at peak hours, when traffic congestion is more of a problem, their importance to accessibility and sustainability analysis should not be understated.

70.12 As far as Thornbury is concerned, I accept that the town offers a reasonably good range of facilities and services, reasonably accessible. However, for choice and a higher order of facilities it would have less to offer. It falls short in terms of the number and range and choice employment opportunities and would be likely to generate increased commuting along the A38, primarily to Bristol and the North Fringe, with little chance of short work based trips. Even with a park and ride scheme the modal shift that would be achieved would be quite slight and not alter the basic premise that development here would significantly add to traffic commuting southwards towards Bristol. In terms of the assessment made, I do not consider it decisive in its support of Thornbury. In my view the choice between sites on the basis of this exercise is relatively narrow. Although improvements to public transport services are advanced by the objector, it seems to me that the option of concentrating development within and on the edge of the main urban area of Bristol offers the best chance of improving the prospects for improving existing and establishing new viable public transport services.

Site suitability

70.13 As regards this site, I am of the view that of the omission sites advanced by objectors this site would possibly be the most suitable for development were the need established. Although not small in scale it is not inappropriate given the size of the town. Although not close to the town centre nor the secondary school, it is not that remote. The land is probably at the lower end of the scale of agricultural land quality that could be available
around the town for development. It is not constrained by green belt designation. It immediately adjoins a rather harsh and abrupt edge of the town. It would spread the town eastwards but in a way that could minimise its impact upon the surrounding landscape. The objection site is well contained by local topography and the two wooded areas. Provided that built development was kept off the upper, easterly slopes, above the 80 metre contour, I believe that development here would sit quite well within the landscape and not unacceptably impinge on wider views of the town.

70.14 In short distance views the development would clearly have an impact, though this needs to be put in the context of the existing sharp edge to the town. From further afield, Thornbury can be seen in a bowl. In some of the middle distance and longer distance views this development would be seen. However, I do not consider that the impact would be as severe as the council fears. If development were to be kept off the higher ground then, in my assessment, the impact would not be such as to detract from the overall setting of the town. There appear to be no other insuperable difficulties that would constrain the development of this site. The ecological interests in terms of bats, newts, the woodlands and hedgerows all seem to me to be matters that are likely to be capable of satisfactory resolution at detailed planning stages.

70.15 In conclusion, I do not find that it is necessary for the achievement of the housing land requirement or the underlying strategies of the RPG or JRSP for sites to be identified around Thornbury. Of all the omission sites around Thornbury before me I find this one possibly the most suitable. However, I do not consider that the opportunities for using modes of transport other than the car are so good as to override the strategic considerations. Development here would be unlikely to offer the same degree of opportunity for developing sustainable forms of transport than sites within or on the edge of the main urban area. Increased commuting flows along the A38 would result, with additional pressure on junction 16 of the M5. I am not convinced that the measures are in place to maximise the attractiveness of public transport in this area and so reduce reliance on the car. For all these reasons I do not support the allocation of this site as either an alternative or additional mixed development site.

**Recommendation**

70.16 I recommend that no modification be made to the local plan.

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**71. Thornbury – Land at Park Farm/Butt Lane**

**Objection**

56/002 Mr Binns HO1 (Omission site) 8.13-8.30

**Issues**

- Should sites be identified in Thornbury for development?
- Is this a sustainable site for development?
- Is the site suitable for development?

**Reasoning and conclusions**

71.1 The objector proposes the allocation of an area of about 8.8 hectares for housing.
I have commented at some length on the first two issues in chapter 2 of my report and in respect of other sites on the edge of Thornbury. To avoid duplication I shall not repeat those arguments here. Suffice it to say, I do not consider that it is necessary or appropriate to allocate sites on the edge of Thornbury. Without significant employment provision and substantial upgrading of public transport services to and around the town I do not consider that this is a sustainable location for new development at this time.

71.2 As regards the suitability of this site, I am of the view that of the omission sites advanced by objectors this site falls somewhere in the middle of any ranking of sites, were the need established. Although not small in scale it is not inappropriate given the size of the town. Although not close to the town centre, it is not that remote. The land is not constrained by green belt designation. However, in isolation it does not relate particularly well to the form of the town and would spread built development northwards out into the gently undulating countryside.

71.3 In short distance views the development would clearly have an impact. From further afield, Thornbury can be seen in a bowl, though in these views it seems to me that the impact would not be such as to detract from the overall setting of the town. Close by the site are a number of listed properties, the setting of which could constrain the achievement of a satisfactory scheme.

71.4 In conclusion, I do not find that it is necessary for the achievement of the housing land requirement or the underlying strategies of the RPG or JRSP for sites to be identified around Thornbury. Development around Thornbury would be unlikely to offer the same degree of opportunity for developing sustainable forms of transport than sites within or on the edge of the main urban area. Increased commuting flows along the A38 would result, with additional pressure on junction 16 of the M5. I am not convinced that the measures are in place to maximise the attractiveness of public transport in this area and so reduce reliance on the car. For all these reasons I do not support the allocation of this site.

Recommendation
71.5 I recommend that no modification be made to the local plan.

72. Thornbury - Hackett Lane

Objection
29/012 Mr G Lanfear H02 (Settlement Boundary)

Issue
Should the settlement boundary be extended to include land at Hackett Lane?

Reasoning and conclusions
72.1 The objector seeks the adjustment of the settlement boundary to include land along Hackett Lane to enable what he sees as a more efficient and effective use of the land. The settlement boundary currently runs along Morton Way along the full length of the eastern side of Thornbury. This is a very well defined edge that marks the clear extent of the built-up area of the town and the countryside beyond.

72.2 Along Hackett Lane there is a small group of properties spread out along the road. The existing boundary is exceptionally clear and reflects the obvious limits of the town. I understand that this boundary has remained unchanged since 1984. The fact of outlying
properties does not warrant now redrawing the boundary to include this small, loosely spread group. Such groupings are not uncommon in the countryside. This small group relates more to their countryside setting than the more densely developed urban area on the other side of Morton Way. In my opinion the inclusion of land here would permit further development that would consolidate the built form and detract from their current character and appearance.

72.3 I note what is said about the need for further development in Thornbury. For the reasons given in section two of my report and in relation to other site related objections reported on in this chapter, I do not consider that land should be allocated for further development in Thornbury. Even if I did, I do not consider that this would justify a detailed change to the settlement boundary to include this small line of properties. As regards making the most efficient use of land, I am satisfied that any proposals should be considered in the context of this group lying in an area of countryside, outside the very well defined built-up area of the town. For these reasons I do not support a change being made to the settlement boundary in the Hackett Lane area.

**Recommendation**

72.4 I recommend that no modification be made to the local plan.

73. **Thornbury - Park Farm**

**Objections**

<table>
<thead>
<tr>
<th>Objection</th>
<th>Party</th>
<th>Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>429/008</td>
<td>David Wilson Estates</td>
<td>H01 (Omission Site)</td>
</tr>
<tr>
<td>429/009</td>
<td>David Wilson Estates</td>
<td>H02 (Settlement Boundary)</td>
</tr>
</tbody>
</table>

**Issues**

- Should sites be identified in Thornbury for development?
- Is this a sustainable site for development?
- Is the site suitable for development?

**Reasoning and conclusions**

73.1 The objector seeks the inclusion of 26 hectares of land within the town's settlement boundary. Of this area 10 hectares are proposed for residential development to provide 300 dwellings, with the remainder given over to open uses and landscaping. The 10 hectares of development would be spread round in such a way as to minimise impact and avoid areas subject to flooding. The effect of doing so means that a not very efficient use would be made of this large expanse of land.

**Thornbury**

73.2 I have commented generally in chapter 2 of my report on the locational strategy as it relates to Thornbury. In brief, I do not consider that this plan should include allocations in the town. The plan concentrates allocations within and on the edge of the PUA. A significant proportion of overall housing provision will continue to come forward within the built-up settlements in the district. Thornbury can continue to fulfil its role in serving local needs and making services available to the wider rural area. I see no conflict with the regional policies, in particular SS7 or SS19, or strategic guidance in this respect.

73.3 I have no reason to question that there is a sustained demand for housing in the town and that there is a sizeable element of internally generated need for housing, including
affordable housing. However, the role of the local plan is not to simply provide housing in each settlement where there is shown to be a need or a demand. The locational spread of housing should reflect national, regional and strategic guidance. I accept that guidance does not require all development to be in or adjoining the PUA. Policies allow for some growth for local needs, in so doing adding to the choice of accommodation. Where appropriate towns can accommodate smaller scale development to meet local needs. Some development will continue naturally within this settlement, albeit fairly small scale. I do not find that the policy guidance regarding the role of the town and its meeting the needs of the community is so compelling as to require specific allocations. Any locally generated need must be weighed with the firmly expressed locational strategy which drives the RPG and JRSP. To place too great an emphasis on local needs would work against an effective implementation of the locational strategy for the area.

73.4 No policies identify Thornbury specifically for additional development by way of allocations. In my view the locational imperative of the regional and strategic guidance leans firmly towards development around the Bristol PUA, rather than adding to development in the outlying towns. The final section of policy SS2 of RPG10 refers to "substantial" development being avoided in towns like Thornbury. The JRSP does not support significant development here. Whilst these quantitative terms can be open to interpretation, I find the balance of the argument lies firmly against making provision in the town. It seems to me that the concerns about the effect of expanding a dormitory town, close to Bristol, are very real and outweigh the desirability of any planned measures aimed at meeting local needs within the town. I recommend a higher housing requirement than the plan, but am satisfied that this can be achieved by concentrating allocations in and around the PUA, reflecting the thrust of national, RPG and JRSP locational preferences.

73.5 About one third of those that live in the town are employed locally. The evidence dating back to 1991 is that nearly 40% work in Bristol city centre or the North Fringe, a figure likely to be higher today. 2001 travel mode information shows that there is currently very low percentage using buses and a high level of dependency on the car. The proposals would simply add to the resident workforce, with no commensurate increase in employment opportunities. This would worsen the perceived imbalance that marks the town as being dependent upon outside, more distant areas for employment for the majority of its residents.

73.6 Most workers have to leave the town for their work and do so very predominantly by private car. The town is well placed in relation to the motorway system. There is no railway station and bus services are scarcely adequate at best and not very attractive to those working in Bristol city centre or across the North Fringe. There would be likely to be a sizeable increase in peak hour traffic flows southwards on the A38. The JRSP calls for the scale of any development to reflect accessibility to local facilities and wider employment opportunities. I have no doubt that in terms of employment opportunities these proposals do not conform with this advice.

**Site sustainability**

73.7 In terms of accessibility to facilities and services in the town, the site is a peripheral one. The site is within walking distance of primary and secondary schools. However, the site is over 1,000 metres from the core of the town centre, above the desired maximum walking distance set out in Table 1 of RPG10. Of more significance is the relationship of this site to employment facilities. It is remote from the main employment area in the town. The site is not in close proximity to any existing bus route which travels out of Thornbury. Bus services could, potentially, be enhanced as suggested by the objector, though I have some misgivings about the size of the development and the achievement of a critical mass to support, in the long term, real, viable improvements to these services. Bus routes would need to be diverted, though such diversions in themselves could make them less attractive overall. Even if services were extended or diverted to better serve the site they would not
be very attractive, with fairly long journey times remaining for those travelling to the city centre or the North Fringe.

73.8 The town has a limited range and choice of employment opportunities. Whilst there is little firm, up-to-date evidence on journey to work movements, I have every reason to believe that the 1991 out-commuting patterns are at the very least as prevalent today as back in 1991. Increased employment opportunities in Bristol and its North Fringe far outweigh any increases in local employment. I have no doubt that the large majority of new residents would be dependent on employment locations some distance from the town. I also consider that the very large majority of journeys to work would continue to be by car. Thus I conclude that the proposals would be likely to generate increased commuting along the A38, primarily to Bristol and the North Fringe, with little chance of short work based trips.

73.9 JRSP policy 4 identifies the corridor to Thornbury as one of those for improvements to maximise travel alternatives to the car. The A38, to the south of the M5, is the subject of Quality Bus Corridor measures. Improvements to the flow of buses along the A38 north of the M5 are less certain. Implementation of a series of associated measures will help to improve the flow of buses through the more congested stretches of the A38 and so have a beneficial impact on the attractiveness of bus routes southwards from Thornbury. Nevertheless, the modal shift that would be achieved would be quite slight and not alter the basic premise that residential development here, unsupported by substantial increases in employment opportunities would significantly add to traffic commuting southwards towards Bristol.

73.10 I have referred to the comparative assessment exercise carried out in connection with the Morton Way site in that part of this chapter. There I have accepted that the town offers a reasonably good range of facilities and services, reasonably accessible. However, for choice and a higher order of facilities it would have less to offer. In terms of the assessment made, I do not consider it decisive in its support of Thornbury. In my view the choice between the 4 sites referred to, on the basis of this exercise, is relatively narrow. Although improvements to public transport services are advanced by the objector, it seems to me that the option of concentrating development within and on the edge of the main urban area of Bristol offers the best chance of improving the prospects for improving existing and establishing new viable public transport services.

**Site suitability**

73.11 As regards this site, I am of the view that this omission sites is much less suitable for development than the Morton Way site. Park Farm is not that remote from the town centre or education facilities. There are, however, landscape and heritage issues of some force. The north western edge of Thornbury is an extremely attractive one. Development of some character edges the town as it merges gently into the surrounding countryside. It includes the listed buildings of the Castle, the Sheiling School, Morton House and Park Farm. The town's Conservation Area adjoins the objection site. The generally open nature of the landscape to the north and west means that the land is not well contained. In my opinion this is an important edge to the town, one that makes a considerable contribution to the overall character and appearance of the place.

73.12 The site does not include the listed buildings, nor any part of the Conservation Area or historic garden. The Castle and School are well set away from the site, with the trees and woods helping to contain their setting. In my opinion it should be possible to develop the site without a direct impact on the immediate setting of those important properties. Likewise, it may be possible, with very careful design and disposition of housing well away from their curtilages, to avoid unacceptable harm to the other two listed properties, albeit their settings would significantly change. The objectors place some emphasis on the longer
term development of a strong framework of vegetation. This seems to me to emphasise the
sensitivity and vulnerability of this edge of the town.

73.13 My concern is primarily related to the wider setting of these buildings and this fringe
of the town. Although long distance views of this edge of the town would not be materially
affected, there would be a substantial impact on closer views and the perception of an
attractive semi-rural setting to the town and the fine buildings found here. Views of the site
would be possible through the gap in development along Park Road. Views could also be
achieved from the road to the north of the site, running across the Levels, and from the
footpaths that cross this area. These views would be fundamentally changed. Whilst having
only a little direct impact upon the Conservation Area itself, I have no doubt that overall it
would detract considerably from the perceived character and appearance of this edge of the
town and the wider, open setting of the important properties found there. It is important to
the character and appearance of this attractive fringe to retain the openness of this land. In
my opinion, if a choice had to be made between various sites around the edge of the town,
this would be a significant factor against choosing this site over others.

73.14 The objection site includes land which is the best and most versatile. This adds
further weight to the already forceful objections to the allocation of this site.

73.15 In conclusion, I do not find that it is necessary for the achievement of the housing
land requirement or the underlying strategies of the RPG or JRSP for sites to be identified
around Thornbury. I am considering a number of omission sites around Thornbury. Having
regard to these, I consider that this site is not the most appropriate or suitable by some
considerable distance. I do not consider that the opportunities for using modes of transport
other than the car are so good as to override the strategic considerations. Development
here would be unlikely to offer the same degree of opportunity for developing sustainable
forms of transport than sites within or on the edge of the main urban area. Increased
commuting flows along the A38 would result, with additional pressure on junction 16 of the
M5. I am not convinced that the measures are in place to maximise the attractiveness of
public transport in this area and so reduce reliance on the car. For all these reasons I do not
support the allocation of this site as either an alternative or additional mixed development
site.

Recommendation

73.16 I recommend that no modification be made to the local plan.

74. Tockington

Objection

477/001 Mr P G Faulkner H02 (Settlement Boundary)

Issue

Should this land be included within the settlement boundary to allow for infill development?

Reasoning and conclusions

74.1 I consider the plan’s strategy in respect of villages in section 11 of chapter 2 of my
report. There I conclude that the plan is right not to allocate sites within or adjoining the
rural settlements for further development. Tockington is a small village with a very limited
range of local services, it relying on nearby Olveston for some of its more immediate needs.
The village lacks its own state primary school. There is only a very modest level of bus
services providing limited connections to Thornbury and Bristol. Occupants of any new
housing here are likely to be very reliant upon the private car, having to travel to Thornbury or further afield for almost all of their daily needs.

74.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Tockington. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. Whilst I accept that future opportunities are likely to be very limited this reflects the very small size of the village. I consider that this level of growth is appropriate for Tockington, enabling some growth without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

74.3 Further, the village is washed over by the green belt, which extends from Bristol northwards to Thornbury. Thus only limited infilling within the settlement is now appropriate both to protect the character of the village and to accord with the purposes of the green belt. The outward expansion of the settlement boundary in these circumstances could facilitate further development within the green belt contrary to its purposes. This objection site is substantially enclosed by the existing village, with the village boundary running along its northern, eastern and southern edge. To that extent the revision of the boundary, as requested by the objector, could be said to round-off the village.

74.4 Settlement boundaries are drawn to indicate where certain policies will apply, not to define the physical extent of the village. The objection site is for the most part open and undeveloped, lying behind the existing housing. There are only very limited views into the site itself. However, the lack of development on the site means that open views are possible across the area, often with a backdrop of trees. The site is capable of accommodating a fairly substantial number of properties if PPG3 density guidance was to be followed. In my opinion, built development on this site would impinge on that sense of openness and thus conflict with the aims of the green belt. I note the property that has recently been permitted, though this appears to be within the existing line of the settlement boundary. Whatever the exact situation in that respect, it does not alter my conclusions. In all these circumstances I consider that the council is right not to extend the settlement boundary to encompass this area of open land.

Recommendation

74.5 I recommend that no modification be made to the local plan.

75. Tockington - Lower Tockington Road

Objections

<table>
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<tr>
<th>Objection Number</th>
<th>Objector Name</th>
<th>Site Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>86/002</td>
<td>The Morel Trust</td>
<td>H01 (Omission Site)</td>
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<tr>
<td>200/002</td>
<td>Mr K T Pearce</td>
<td>H01 (Omission Site)</td>
</tr>
</tbody>
</table>

Issue

Should this site be included within the settlement boundary and allocated for housing?

Reasoning and conclusions

75.1 In the previous item I have concluded that Tockington is not a sustainable location for further development by way of extensions to its settlement boundary or by way of allocation...
of sites. It lies within the green belt where polices presume against inappropriate
development.

75.2 These objections relate to open, green belt land on the south west edge of the village. For the reasons given in the previous item I do not support the extension of the village settlement boundary. This land, although fronting two village roads, with housing opposite does not form a natural rounding-off of the village. Rather, its inclusion within the village boundary would enable the extension of the built form out into the countryside. It is a prominent site and its development would have a very significant impact upon the appearance of the area and on its openness. That would be in direct conflict with the openness of the green belt. In my view there are no exceptional circumstances for modifying this local plan to facilitate development on this green belt site. Should there be a need identified for affordable housing locally, then the plan’s policies set out ways in which this might be achieved.

Recommendation
75.3 I recommend that no modification be made to the local plan.

76. Tockington – Tockington Manor School

Objection

397/001 Tockington Manor School H02 (Settlement Boundary)

Issue

Should the village settlement boundary encompass the school?

Reasoning and conclusions

76.1 In item 74 above I have concluded that Tockington is not a sustainable location for further development by way of extensions to its settlement boundary or by way of allocation of sites. It lies within the green belt where polices presume against inappropriate development.

76.2 Tockington is a small village and I consider the council is right to draw the boundary tightly around it. The school buildings and grounds extend to a considerable area. The high stone wall, the main school buildings and associated grounds have a significant presence and contribute to the character and appearance of the village. That said, I do not believe that the school should be included within the village settlement boundary. The settlement boundary is drawn to indicate where certain polices apply, not to define the physical extent of the village and its buildings. The school site includes extensive areas of gardens and open land, with significant areas of trees and other planting. The buildings are set within what is essentially a rural landscape. It is clearly institutional in nature and quite different in character to the residential parts of the village. In my view it is quite logical of the council to define the village excluding this large site.

76.3 The whole village is washed over by the green belt. Within the green belt some limited forms of infill development may be appropriate under the terms of policy GB1. It seems to me that the potential for development within the school grounds would go well beyond what might reasonably be thought of as infilling. The primary attribute of the green belt is its openness and there is no doubt that the school site contributes to that openness. In my view it is entirely right that any proposals for development within the school should be determined in the context of the green belt policies. It will be for the school to argue any special circumstances if and when any development proposals are put forward.
Recommendation

76.4 I recommend that no modification be made to the local plan.

77. Tytherington - Land off Stowell Hill

Objections

94/002 B.F & B.J Taylor  H01 (Omission Site)
94/003 B.F & B.J Taylor  H02 (Settlement Boundary)

Issue

Should all or part of this land be included within the settlement boundary and allocated for housing?

Reasoning and conclusions

77.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. Tytherington is a small village with a very limited range of local services. It has no shops. There is a very skeletal bus service. It is a relatively isolated village with occupants of new housing here likely to be very reliant upon the private car, having to travel to Thornbury or further afield for almost all of their daily needs.

77.2 The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Tytherington. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. In this respect I note that since 1991 over 30 dwellings have been completed in or near the village. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

77.3 The objection site is an extensive one, part of which is used for open storage. I understand also that there is an extant permission for the erection of a pig rearing unit. Although visible from Stowell Hill Road, the site is reasonably well contained in the landscape and development here would not be unduly prominent. Nevertheless, it is not a proposal I can support. The village has a poor range of facilities and, at best, only a very modest bus service. Because of its location it is likely that development in this area would be very much dependent on the motor car. There is no support in national guidance for allocating land on the edge of this village. Allowing development here would unacceptably conflict with the plan's strategy for a sustainable pattern of development. Whilst there may be some benefit in replacing the commercial development with housing, I do not consider that this outweighs the strong sustainability arguments that weigh heavily against extending the extent of the village and providing for new housing by way of an allocation.

Recommendation

77.4 I recommend that no modification be made to the local plan.
78. Tytherington - Stowell Hill Road

Objection

404/002 Hannick Homes & Developments Ltd H01 (Omission Site)

Issue

Whether this site should be allocated for housing.

Reasoning and conclusions

78.1 I have concluded in the previous item that Tytherington is not a sustainable location for further development beyond that that may be acceptable within the defined settlement boundary. There is no need to enlarge the settlement boundary, nor to allocate additional housing sites. Here the objectors are seeking an allocation of a garden and paddock area for housing. This site lies within the settlement boundary. On my site visit I observed that 3 houses were close to completion on part of the site. As far as the remainder of the site is concerned, this lies within the village and, in principle, is suitable for development, subject to the criteria in policy H2. I have recommended there that greenfield sites within villages should be included within the permissive approach. Given the strategy of the plan I do not consider it appropriate to make a formal allocation here, but if the objector wishes to pursue a housing development on the balance of the objection site, then the merits of this can best be considered by way of a planning application.

Recommendation

78.2 I recommend that no modification be made to the local plan.

79. Tytherington - The Villa, West Street

Objection

306/003 G & S J Smith H02 (Settlement Boundary)

This site is considered in chapter 5 of my report, under item 26

80. Warmley - Grimsbury Farm

Objection

343/017 Hallam Land Management Ltd H01 (Omission Site)

Issue

Should this site be allocated for housing?

Reasoning and conclusions

80.1 This site lies at the eastern edge of Kingswood with the Avon Ring Road forming its eastern boundary. It is generally open in character and provides the base for a Community Farm and Day Centre, together with associated and other activities. It appears to perform a valuable community function both in terms of the formal activities operating from the site and the informal use made of it. Much of the site was identified in earlier plans for the development of land in the wider area to remain as open land.
80.2 Parts of it are relatively elevated. Although most of the site is hidden from views along the Ring Road by the embankment and bushes, it does form an important element of open space within the wider landscape. It is one of a number of stretches of open land running along the Ring Road corridor. In my view it provides an attractive and valuable open area making a positive contribution to the quality, character and appearance of this edge of Kingswood.

80.3 In terms of the sequential search for sites I have concluded elsewhere that open land within the PUA should be given priority over extending the urban area. Given my conclusions on the level of housing land required I support the principle of developing suitable sites, whether greenfield or previously developed that are within the PUA. However, in respect of this site I consider that it provides a valuable community facility and makes a significant contribution to the character of this area and that its development would cause unacceptable harm to that contribution. For that reason I do not support the identification of the site for housing.

**Recommendation**

80.4 I recommend that no modification be made to the local plan.

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**81. Warmley - Nursery, Tower Road North**

**Objections**

<table>
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<tr>
<th>Objection Number</th>
<th>Party</th>
<th>Code</th>
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<td>313/011</td>
<td>Matchmove Ltd</td>
<td>H01 (Omission Site)</td>
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<tr>
<td>443/001</td>
<td>Mr &amp; Mrs Grimster</td>
<td>H01 (Omission Site)</td>
</tr>
</tbody>
</table>

**Issue**

Should this site be allocated for housing?

**Reasoning and conclusions**

81.1 These objections relate to land to the rear of properties along Tower Road North that was used as a nursery. An original objection quoted the size of the site as being 0.23 hectares, bringing it below the threshold used in the plan for the identification of housing allocation sites. Subsequently this was corrected to a measurement of 0.6 hectares. As the latter figure appears to be the correct one and relates to the nursery site in question, it is on this latter basis that I have considered the objections.

81.2 In terms of the sequential search for sites I have concluded elsewhere that open land within the PUA should be given priority over extending the urban area. Given my conclusions on the level of housing land required I support the principle of developing suitable sites, whether greenfield or previously developed that are within the PUA. However, in respect of this site I consider that there are considerations which weigh against the allocation of this site.

81.3 It lies within the Warmley Conservation Area. This is centred upon the Warmley House and Gardens and their setting. In the council’s Advice Note on the Conservation Area specific mention is made of the nursery site, with it being described as being mostly open in character and providing a buffer between the Tower Road North houses and the historic gardens to the rear. It goes on to say that it is particularly important that the nursery area adjoining the main part of the garden remains free from any development as this would impinge on the setting of the garden. The enhancement strategy/design guidance states that the redevelopment of the nursery site will not be permitted due to the adverse impact this would have on the historic gardens and of Warmley House itself.
81.4 Whilst this guidance does not carry the weight accorded to the development plan, it is still material to my considerations. I have insufficient information before me to determine whether some part of the site might be developable in a way that would preserve or enhance the appearance or character of the Conservation Area. Certainly, there appear to be real difficulties in achieving a development of the whole site. On this basis I am not in a position to support an allocation of the site or part of it. It would be for the development control process to determine whether there is any potential here to achieve a limited housing development on part of the site.

Recommendation
81.5 I recommend that no modification be made to the local plan.

82. Warmley - Tower Road North

Objection
419/003 Warmley Investments H01 (Omission Site)

I consider this site under item 23 in chapter 7 of my report

83. Westerleigh - Jorrocks Estate

Objections
305/001 Newman & Sons (Westerleigh Ltd) H02 (Settlement Boundary)
383/001 Mr R E Newman H01 (Omission Site)
383/002 Mr R E Newman H02 (Settlement Boundary)

Issue
Whether this land should be included within the village boundary to allow for its development for housing?

Reasoning and conclusions
83.1 Westerleigh lies about 1km south of Yate. It is washed over by the green belt, with provision only for infill development within the settlement boundary. These objections seek the inclusion of the Industrial Estate and other open land within the village boundary, with a view to allowing its development for housing. The local plan shows Westerleigh village being washed over by the green belt. The Industrial Estate is included within the village boundary, with the open land outside.

83.2 I am satisfied that the village is correctly treated in the local plan. It is a small village with very limited facilities and services. For almost all needs residents would have to travel to other towns for their needs. There is only an hourly bus service to Yate and Bristol. If further development were to be allowed here it is likely to generate additional need to travel and increase reliance upon the car. It is not a sustainable location for more housing. Westerleigh was defined in the Rural Areas local plan as a village where development should be limited to small scale infilling. I see no reason to question that approach. The status of the village, and its unsuitability for further development beyond the small scale, means that it should be subject to green belt policies, with the green belt continuing to wash over it.
83.3 As regards this site, part is included within the village boundary, where policy GB1, reflecting the advice in PPG2, allows for limited infill development that would not materially impact on the openness of the green belt. The balance of the site lies outside the village boundary, where there is a presumption against inappropriate development. Thus, under the present position, some very limited development may be possible within the Industrial Estate, with a very restrictive approach applying to the rest of the land. Inclusion of all the land within the village settlement boundary would not facilitate a significant development as suggested by the objectors. Only limited infill development would be possible, since the village is washed over by the green belt notation. To facilitate development on the scale suggested would necessitate excluding this land from the green belt. To do so it would be necessary to show that exceptional circumstances exist to justify a change in the green belt.

83.4 For the reasons I have explained in respect of policy GB1 and the introduction to this section on individual sites, I do not consider that there is a need for changing green belt boundaries to facilitate new housing development. In terms of the scale of the village the site is a large one, capable of accommodating a significant number of dwellings. The site immediately adjoins the village. Part of it comprises the Industrial Estate, with a range of buildings and activities that no doubt co-exist uneasily with the adjoining housing. The remainder of the land is open in character and forms part of its countryside setting. In my view the land here performs a number of green belt functions, including safeguarding the countryside from encroachment and maintaining the separation between the village and Yate. Development of this open land would be in direct conflict with the openness of the green belt.

83.5 I note the particular circumstances of the Industrial Estate but do not consider that these constitute the exceptional circumstances necessary to justify moving the green belt boundary to accommodate further development at Westerleigh. I do not consider that the time is right to make strategic changes to the green belt. In any event, if further development is to take place in the Yate area, then I do not consider that a site in a nearby small village such as Westerleigh would be the best choice.

Recommendation

83.6 I recommend that no modification be made to the local plan.

84. Westerleigh - Land West of Westerleigh Road

Objection

455/004 Mr Fox 455/004 H01 (Omission Site)

This site is considered in chapter 5 of my report, under item 28

85. Wick - Rear of Nos 71-83 High Street

Objections

315/001 RMC Group Services Ltd H01 (Omission Site)
315/003 RMC Group Services Ltd H02 (Settlement Boundary)

Issue

Should this land be included within the settlement boundary and allocated for housing?
**Reasoning and conclusions**

85.1 This site lies within the green belt, immediately north of the defined settlement boundary of Wick. Wick itself is a washed over settlement within the green belt. In chapter 8 of my report I have concluded that the housing requirements of the district can be met without making changes to the green belt. Nor is it necessary to look to villages such as this to find further housing sites. I do not have the necessary exceptional circumstances to warrant the allocation of green belt land for housing. Development here would be inappropriate.

85.2 The objection site lies to the rear of linear development along the main road. Although there is some development behind this frontage, the overriding character and appearance is one of fields and trees. I find nothing to suggest in any way that the site falls naturally within the confines of the settlement. On the contrary, inclusion of this land within the settlement boundary would be at odds with its location behind the linear, frontage development. It would open up the area behind the frontage for development in a form that would seriously damage the character and appearance of this rural area.

**Recommendation**

85.3 I recommend that no modification be made to the local plan.

86. **Wickwar - Meads Farm**

**Objections**

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<td>143/003</td>
<td>The James Family</td>
<td>H02 (Settlement Boundary)</td>
</tr>
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</table>

**Issue**

Should this land be included within the settlement boundary and allocated for housing?

**Reasoning and conclusions**

86.1 I consider the plan's strategy in respect of villages in section 11 of chapter 2 of my report. There I conclude that the plan is right not to allocate sites within or adjoining the rural settlements for further development. The plan seeks to focus development upon the main urban areas. This strategy provides for more limited amounts of growth through incremental development within the defined village settlement boundaries. The structure plan requirements for the district can be met without the need to allocate housing land within less sustainable village locations such as here. I do not consider that there is a need either to extend village settlement boundaries, or to make greenfield peripheral allocations in villages such as Wickwar. There still remains the opportunity for incremental, organic growth through infilling, redevelopment and conversions. I consider that this level of growth is appropriate for the village and can help to sustain and enhance its role without causing conflict with the aim of achieving a sustainable pattern of growth in the district.

86.2 I accept that Wickwar is a large village with a reasonable range of local services, not least fairly extensive employment areas. There is a modest bus service. Notwithstanding these points, it is a relatively isolated village with occupants of new housing here likely to be very reliant upon the private car, having to travel to Yate or further afield for many of their daily needs.

86.3 The objection extends to over 8 hectares, which is capable of producing over 250 dwellings at PPG3 density standards. This is a very substantial amount in the context of a
village of about 2,000 people. Development here would represent a very large outward expansion of the village into the surrounding countryside. Given the relatively unsustainable nature of this location and the lack of need to look to villages for further development, I cannot support the inclusion of this site within the settlement or its allocation for housing.

**Recommendation**

86.4 I recommend that no modification be made to the local plan.

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### 87. Wickwar - Wickwar Telephone Exchange

**Objection**

294/001 British Telecom Plc H02 (Settlement Boundary)

**Issue**

Should this land be included within the settlement boundary?

**Reasoning and conclusions**

87.1 The objection site comprises a building used as a Youth Centre, a Telephone Exchange and a bungalow. The settlement boundary of Wickwar is drawn tightly around the main built up area of the village and excludes this small group. The purpose of the settlement boundary is to define the extent of the settlement within which further development may be acceptable.

87.2 I fully accept that it should not necessarily be drawn to correspond with the extent of the settlement. However, I believe that the line of the boundary at this point is not very logical. These three properties immediately adjoin the built up area within the boundary. To the south is a undeveloped area, with much more sporadic development beyond. There is no doubt in my mind that in visual terms as one approaches the village from the south the properties on this site mark the beginning of the main area of the village. There is a pronounced break in the frontage development to the immediate south and I consider that this best marks the split between the village and the surrounding countryside for planning purposes.

87.3 I accept that the site includes some land to the rear of the buildings. Nevertheless, I see no harm arising from the inclusion of this site within the settlement boundary. It is a minor adjustment that would have no material impact upon the strategy of the plan and the locational spread of development. Other policies are in place in the plan to ensure that any proposals that might come forward as a result of its inclusion within the village settlement boundary do not cause unacceptable harm to the character or appearance of the area. In conclusion I support the objection as being a more logical edge to the village for planning purposes.

**Recommendation**

87.4 I recommend that the local plan be modified by the inclusion of this site within the village settlement boundary.
88. Willsbridge - Bath Road

Objection

418/002 Edward Ware New Homes Ltd H02 (Settlement Boundary)

This site is considered in chapter 5 of my report, under item 29.

89. Willsbridge - Jarretts Nursery

Objections

44/006 Linden Developments Ltd H01 (Omission Site)
44/004 Linden Developments Ltd H02 (Settlement Boundary)

This site is considered in chapter 5 of my report, under item 30.

90. Willsbridge - Willsbridge Hill

Objections

196/004 Mr M Deaker H02 (Settlement Boundary)
196/005 Mr M Deaker H01 (Omission Site)

This site is considered in chapter 5 of my report, under item 31.

91. Winterbourne - Bristol Road

Objections

281/002 Mrs J Churchill H01 (Omission Site)
281/003 Mrs J Churchill H02 (Settlement Boundary)

This site is considered in chapter 5 of my report, under item 32.

92. Winterbourne - The Cloisters, Watley End

Objection

402/002 Robert Frederick John Gooding H01 (Omission Site)

This site is considered in chapter 5 of my report, under item 34.

93. Yate - Coopers Works, Westerleigh Road

Objection

450/001 RM Coopers Children's Settlement H01 (Omission Site)
Issue

Should this site be allocated for housing?

Reasoning and conclusions

93.1 The council accepts that this previously developed site within the settlement is suitable for housing. Previously expressed concerns about the presence of badgers appears to be fully capable of resolution. The council does not consider that the site should be retained for employment uses. In these circumstances there appears to me to be no insuperable obstacle to the principle of housing development.

93.2 The only question to be resolved is whether it should be specifically identified in the plan by way of a formal allocation. In my view it should. This is a previously developed site within one of the defined urban areas. It is a sustainable location for development and in terms of the PPG3 sequential approach it falls within the first category. I would have expected it to feature in the Urban Capacity Study, though this absence may have reflected concerns about the badgers. Whatever the position in that respect, there is no doubt in my mind that the thrust of national guidance is to promote sites such as this. For the council to say that there is already sufficient land identified is a curious argument when much of that land is greenfield and guidance is strongly promoting sites such as this. The site is approximately 1.1 hectares in extent and should be capable of accommodating upwards of 35 dwellings. If the council were concerned about overprovision, then these concerns could be met by the substitution of this site for a greenfield site. However, because of my conclusions on housing land supply, I do not consider that there need be concern about over-provision and I see no problem with adding this site to those sites already allocated in the plan.

93.3 The formal allocation of this site would underline the suitability of this site for housing and would help to emphasise the priority that should be given to such sites. Accordingly, I recommend that this site be added to the list of sites under policy H1(A). I leave the detailed wording to be determined by the council.

Recommendation

93.4 I recommend that the local plan be modified by the addition of the following to policy H1(A):

"1.1HA Coopers Works, Westerleigh Road, Yate Min av density 30 Dwelling target 35"

94. Yate - Rear of The Farmhouse PH, Wellington Road, Yate

Objection

470/001 Hatfield Developments H01 (Omission Site)

Issue

Should this land be allocated for housing?

Reasoning and conclusions

94.1 This site comprises an area of informal open space to the rear of a site allocated for a primary school. Although previously protected in the Consultation Draft Plan as an Area to Remain Open, that designation no longer applies. The revised deposit plan has deleted that approach to the protection of open spaces and now adopts a criteria based approach, by way
of policy L6. Thus any proposal for housing on this site would be subject to both the requirements of policy H2, for housing schemes within existing settlements, and policy L6.

94.2 In my view the merits of the retention of this land as open space and of providing housing here can best be judged in the context of those two policies. Certainly, I see no compelling reason, in terms of housing need in the district, to take the step of recommending that this land should be specifically allocated. Its development for housing would make a useful contribution to housing supply, but such benefits would need to be weighed against the disbenefits of losing this open space.

Recommendation

94.3 I recommend that no modification be made to the local plan.

95. Yate - Bristol Mineral Works, Limekiln Road

Objection

481/001 TLT Solicitors H01 (Omission Site)

Issue

Should this site be identified for a housing development?

Reasoning and conclusions

95.1 The Bristol Mineral Works is located in open countryside about 2 km north of Yate. Although the site is previously developed I do not consider that this provides convincing reason to identify this site for housing. Because of its isolated, rural location, served by local rural roads of a generally poor standard, it is not a sustainable location to encourage development. Residents would be completely dependent upon cars to reach any services and facilities. In this area the council is right to give priority to the conservation and enhancement of the countryside. Were there a need to identify more land for housing there are many more suitable locations than this.

Recommendation

95.2 I recommend that no modification be made to the local plan.

96. Yate - Broad Lane

Objection

177/001 James & Co H02 (Settlement Boundary)

Issue

Should this land be included within the settlement boundary?

Reasoning and conclusions

96.1 This site comprises a narrow wedge of land, formerly a garden centre but now derelict, between the main road, Iron Acton Way and Broad Lane; to the south a major employment area and to the north, the outlying small settlement of Engine Common. It forms a small slither of undesignated land between the respective settlement boundaries of Yate and Engine Common. The council accepts that it is previously developed land, albeit the
buildings and infrastructure did not cover the whole footprint of the site. Planning permission has recently been granted for the erection of a food pub with associated living quarters and car parking on part of the site.

96.2 The council accepts that there is scope for some development of this site, but is concerned that including the site within the settlement boundary would release land which would allow a much greater scale and density than has been permitted, with consequent impact upon the landscape and access. The site at present helps to provide a visual and physical gap between the edge of Yate and its main road and the Engine Common area to the north. These two areas have quite distinct and different characters. The objection site has a thick hedge on its northern edge and some vegetation on its southern boundary. This helps to form a break between the town and the more rural development to the north. That said, it is noted that Broad Lane also gives access to an employment area, protected by the plan, to the north east of the site. In effect, the site is surrounded by built development.

96.3 Bearing in mind the planning history of the site, I am not persuaded that the most appropriate way of recognising the potential of the site, whilst reflecting the landscape and access concerns is through the site's exclusion from the settlement boundary. Whilst Engine Common does have a different character to Yate, this is capable of being protected by the application of the plan's policies. This is a previously developed site, one with planning permission for development, in part. Whilst this does not necessarily mean that the whole area of the curtilage should be redeveloped, national guidance stresses the priority to be given to such land.

96.4 I have concluded that there is no need for the plan to identify housing allocation sites in Yate. The possibility of some form of employment development on the site would accord with my view that there is some advantage to be had in improving the employment base of the town. I do not find either of these matters compelling in terms of making a change to the settlement boundary. Rather, I am very much guided by the site's planning history and its status as previously developed land. Provided that a development respected the buffer role of the site, between Yate and Engine Common, and retained a high proportion of the site's existing vegetation, then I see no reason why some development should not be encouraged by the inclusion of the site within the settlement boundary.

96.5 In my view the plan's policies give a clear framework to consider the impact of any development of this site. These provide the policy context for the council to make a judgement about the acceptability of a particular scale of development bearing in mind landscape, access and any other relevant issues. In my view this is a matter that can best be dealt with through the development control process, rather than through the retention of a narrow wedge of land, which is surrounded by development, outside the settlement boundaries.

**Recommendation**

96.6 I recommend that the local plan be modified by the inclusion of this land within the settlement boundary of Yate.

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**97. Yate - Broad Lane/Watery Lane**

**Objection**

| 320/005 | Taywood Homes | H01 (Omission Site) |
Issue
Should this site be identified for development?

Reasoning and conclusions
97.1 This site comprises a field to the north of Broad Lane. Currently it appears as part of the larger area of open countryside to the north of the town, served by a country lane. Any development of this site in isolation is without clear foundation. For the reasons I have given in the strategy chapter and in respect of other Yate omission sites I do not support the incremental release of sites on the north side of the town. Any potential for development in this area rests with a comprehensive look at medium and long term needs of the Yate area, through the next generation of plans.

Recommendation
97.2 I recommend that no modification be made to the local plan.

98. Yate - Dyer's Lane, Engine Common

Objection
455/006 Bovis Homes (South West) Ltd H01 (Omission Site)

This site is considered in chapter 5 of my report, under item 35.

99. Yate - North Road

Objection
39/001 Mr P R Belcher H01 (Omission Site)

Mr Belcher objects to further development in the North Road area. The plan proposes none. I consider objections proposing development in the area in this chapter.

100. Yate - Engine Common

Objection
344/016 Sydney Freed Holdings & J S Bloor (Newbury) Ltd H01 (Omission Site)

Issue
Should this land be allocated for a mixed use development?

Reasoning and conclusions
100.1 These objections relate to an area of just over 18 hectares to the west side of North Road, north of Lodge Road/Iron Acton Way. The proposal envisages a total of 7.1 hectares of housing, providing for a minimum of 300 dwellings together with a care home for the elderly. 4 hectares of employment land would be provided, together with a new primary school. I have dealt at some length in the Strategy section with the question of Yate's position in the sequential hierarchy and concluded that the failure of the plan to include a major housing allocation in Yate would not bring it into unacceptable conflict with the JRSP.
A recommendation in favour of this site would have to be based on other justification of sufficient substance to outweigh the position of Yate in the sequential hierarchy.

100.2 I note the evidence submitted on the level of housing need in the Yate area. Based on the evidence submitted it is suggested that there is a minimum local need for housing in Yate up to 2011 of about 900 dwellings. The council could point to the potential for about one third of this level being provided without further allocations. There is also a high level of local need for affordable housing. I am far from persuaded that these issues can be looked at on a settlement by settlement basis. A more global view needs to be taken. Having regard to all the evidence presented I do not consider that the level of need ascribed to the Yate area is so compelling as to justify a fundamental revision in the plan's strategy.

100.3 The level of out-commuting from Yate, especially to the Bristol conurbation, is acknowledged to be high. An express bus route passing the site provides two buses in each peak hour for travellers to and from Bristol but it does not provide direct access to the North Fringe. The objectors have expressed a willingness to underwrite additional operating costs on an increased frequency of service if there should be a perceived need. Various measures are proposed by the plan and the Local Transport Plan to improve the attractiveness of public transport as an alternative to the private car. However, the LTP bus strategy corridor serving Yate is likely to be the A432, so that it would be well over 1km from most of the houses on the site, compared to the 600m maximum walking distance set by RPG10. Most residents at the site would live upwards of 1.1km walking distance from the station, compared to the RPG maximum of 800m. While these factors would not tell against the proposal if there could be a reasonable degree of certainty that future residents of the site would work either within the site or within walking distance, they add little to the argument in favour of the site.

100.4 The proposal is for a mixed use development which, it is estimated, would bring a net gain of about 300 more jobs than economically active people. This would not be a major factor in reducing the present high level of out-commuting from Yate but it would certainly make a contribution. However, the level of demand for an overall increase in employment space in Yate is far from certain. Further evidence is needed as part of the consideration of the future role and scale of growth of the town in the post 2011 period. In the mean time, this uncertainty means that the job creation element of the proposal can carry only limited weight in its favour.

100.5 Engine Common has a somewhat fragile, though none the less valuable character as separate from Yate. The railway line and the fields on either side form a visual and physical break, but the potentially dominating effect on the settlement of the industrial development on the south side of Goose Green Way/Iron Acton Way is overcome only by the buffer effect of the strips of land extending east and west from the North Road junction. There is no doubt that, were the development to proceed, the new link road serving the site, from Iron Acton Way, would be necessary. The employment element would properly be positioned in the south-west part of the site. But both would serve to bring the development, and by association the existing settlement, into closer identity with Yate. In particular, I am not convinced that the visual impact of the proposed industrial element could be sufficiently overcome by landscaping to avoid the site appearing, from the western approach, to be part of an industrial gateway to Yate.

100.6 Though Engine Common has local services in the form of two public houses, a church and a post office/convenience store, it is between 1½km and 2km walking distance from Yate Town Centre, with it supermarkets, general shopping and leisure facilities. This is well beyond the desirable walking distance set by RPG10. However, three bus services passing the site in between one- and two-hourly intervals also stop in Yate town centre.
100.7 The site is reasonably close to a secondary school. The proposal would include a new primary school, overcoming the need to redevelop the existing school in order to improve the facilities for pupils in its existing catchment and helping the residents of the site to see themselves as part of Engine Common as a distinct community. Nevertheless, existing residents of the settlement could feel themselves swamped by the population of the proposed 300 houses.

100.8 It may well be possible to overcome other site-specific concerns, including the need for relocation of the football club, the loss and possible replacement of part of the designated area of SNCI and the impact on the archaeology of the site. Even so, I do not find sufficient justification for the allocation of this site ahead of others higher in the sequential hierarchy.

100.9 In conclusion, I do not support the expansion of the town beyond its existing boundaries in this plan period. I find that the housing requirements can be met by the allocation of sites in and around the main urban area of Bristol. It will be for the next round of plans to consider the role of Yate and the balance to be drawn between further employment and housing provision. In the future it is quite possible that further comprehensive development will be promoted and that land around Engine Common will be one of the areas to be considered. These proposals have many advantages, but on balance I do not consider that they are necessary at this time.

Recommendation

100.10 I recommend that no modification be made to the local plan.

101. Yate - Engine Common - Mission Road

Objections

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H02 (Settlement Boundary)  
H01 (Omission Site)

Issue

Should this site be included within the settlement boundary and allocated for housing?

Reasoning and conclusions

101.1 This site extends to about 1.3 hectares behind frontage development along North Road. The western quarter was used for commercial purposes, with planning permission being granted for housing on the basis of the removal of the business use. The remainder of the site is occupied by a house and by agricultural land. At PPG3 densities the site would be capable of accommodating upwards of 40 dwellings, a scale at odds with the small settlement of Engine Common.

101.2 Notwithstanding its history and existing development upon it, in my view the site appears as part of the larger area of open countryside to the north of Yate, west of Engine Common. It is served by a country lane. Any development of the whole of this site in isolation would be unacceptable and would harm the rural appearance and character of the area. For the reasons I have given in the strategy chapter and in respect of other Yate omission sites I do not support the incremental release of sites on the north side of the town. I have not identified the need to allocate sites around Yate to meet the housing requirements in the plan period. Any potential for development in this area rests with a comprehensive look at medium and long term needs of the Yate area, through the next generation of plans.
Recommendation

101.3 I recommend no modification be made to the local plan.

102. Yate – Engine Common

Objection

420/008 Bryant Homes Technical Services H01 (Omission Site)

Issue

Should land at Engine Common be allocated for a major mixed use development?

Reasoning and conclusions

102.1 This site comprises a very extensive area of land around Engine Common. To avoid repetition, I refer only to my conclusions made in respect of Yate in the strategy chapter of my report and to my conclusions in respect of other Yate sites covered in this chapter. For the reasons I have given there, I do not support the release of sites on the north side of the town. I have not identified the need to allocate sites around Yate to meet the housing requirements in the plan period. Any potential for development in this area rests with a comprehensive look at medium and long term needs of the Yate area, through the next generation of plans.

Recommendation

102.3 I recommend that no modification be made to the local plan.

103. Yate - North Yate

Objection

268/008 Heron Land Developments Ltd H01 (Omission Site)

Issue

Should land be allocated here for a major mixed use development?

Reasoning and conclusions

103.1 My opening remarks on the Engine Common site, item 100 above, apply equally here. The site covers an extensive area, of 125 hectares. A mixed use development is proposed, comprising 28 hectares of housing and 15 hectares of employment land, together with a school and other community facilities.

103.2 The site lies to the north of existing development at Brimsham Park, which forms the present northern limit of the Yate settlement. It is evident from the layout, as well as the history presented at the Inquiry, that the site was seen as a second phase when Brimsham Park was being planned and developed. Thus much of the supporting infrastructure for the site is already in place. It seems reasonably likely that, if the development were to proceed, identified problems with the capacity of the Frome Valley sewerage system could be resolved.
103.3 I consider the appearance of the edge of the existing development to be rendered reasonably inoffensive by its irregular boundary and such cover of mature hedges and trees as exists at the fringe. It is nonetheless somewhat hard compared to what could be achieved by a more organised and structured approach, such as that suggested for the northern boundary of the proposed housing and employment. Though this and other landscape works may be crucial to the acceptability of a planning application, they are of only limited importance in considering the possible allocation of the site in the plan.

103.4 The site would provide approximately 900 dwellings in the plan period, with an indicated maximum of 1400 based upon an allocation of 28 hectares and an overall density of 50 dwellings per hectare. Of these it is suggested that about 420 could be affordable homes. These would be served by local facilities within the site, including a new primary school, and many would be within reasonable reach of existing facilities. A housing study has shown an upsurge in house prices in Yate which is believed to be due to the increasing popularity of the area, both with existing and prospective residents, combined with a shortage in the supply of new properties. This, it is further suggested, has led in turn to a lack of dwellings suitable for first time buyers and affordable homes that the proposal could help to overcome. Further quantitative and locational studies, forming part of the review I have discussed in the strategy section, may confirm this and find that the issue needs addressing by the provision of more new housing in and around the town. However, the present evidence of need is not in my view so compelling as justify a fundamental variation in the plan's strategy.

103.5 A further 15 hectares would be taken up with new employment, of which half would be taken up with offices. It is estimated that this allocation would give rise to about 2300 jobs, with the expectation that the majority would be taken up by residents on the site and from within the rest of the Yate area. I have dealt with this issue in some detail in relation to the Strategy Statement and to Engine Common. My conclusions apply equally here.

103.6 The site is a large one and even its southern boundary is hardly a reasonable walking distance from the town centre, railway station and bus station, especially when measured against the respective standards in Annex A of RPG10. Several transportation measures would be offered support by the development. In cash terms, and subject of course to detailed negotiation, a figure of £2.85M is presented in the objector's evidence as a basis. Any contributions would have to respect the provisions of Circular 1/97. Thus, for instance, though the £0.6M identified with the railway turnback facility would give that scheme greater certainty of implementation, it could only be taken up to an extent demonstrably compatible with the rather modest estimated number of journeys originating from the site that it would accommodate.

103.7 Overall, the approach of the development to transportation issues is constructive, including its attention to timing. A number of measures offered financial support would also bring benefits to the existing community. A shuttle bus service to the site's employment zone would certainly set an example in favour of a modal shift from the car, but it would require an innovative approach if it were to have a long-term future based on contributions from all employers on the site.

103.8 Though several issues therefore support the development of the site, I consider that they do not outweigh the sequential superiority and particular benefits of the other sites whose allocation I recommend.

**Recommendation**

103.9 I recommend that no modification be made to the local plan.
104. Yate - Land North of Yate

Objections

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Issue

Should land be allocated here for a major mixed use development?

Reasoning and conclusions

104.1 This land is substantially the same as considered in the previous item. For the reasons given there I do not support a major allocation of land on the edged of Yate.

Recommendation

104.2 I recommend that no modification be made to the local plan.

105. Yate - North of Brimsham Road

Objection

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Issue

Should this site be allocated for housing?

Reasoning and conclusions

105.1 This land comprises an area of countryside, forming part of the much larger area of land considered in the two previous items. For the reasons given there I do not support the allocation of land on the north side of Yate.

Recommendation

105.2 I recommend that no modification be made to the local plan.

106. Yate - Land at Tanhouse Lane

Objection

<table>
<thead>
<tr>
<th>Objection</th>
<th>Persimmon Homes</th>
<th>H01 (Omission Site)</th>
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<td>265/021</td>
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Issue

Should this site be allocated for housing?

Reasoning and conclusions

106.1 This land comprises an area of countryside, forming part of the much larger area of land considered in the two previous items. For the reasons given there I do not support the allocation of land on the north side of Yate.

Recommendation

106.2 I recommend that no modification be made to the local plan.
107. Yate - Land at Yate Rocks

Objection

147/001 The Needham Cooper Charitable Trust H01 (Omission Site)

Issue

Should this site be allocated for housing?

Reasoning and conclusions

107.1 This land comprises an area of countryside on the north eastern edge of Yate, part of the large swathe of land on this side of Yate subject of objections seeking its identification for development. For the reasons given in the strategy section of my report and in the other items relating to Yate omission sites I do not support the allocation of land on the north side of Yate.

Recommendation

107.2 I recommend that no modification be made to the local plan.

108. Yate - Land at Ford Farm

Objection

265/022 Persimmon Homes H01 (Omission Site)

Issue

Should this site be allocated for housing?

Reasoning and conclusions

108.1 This land comprises an area of countryside on the north eastern edge of Yate, part of the large swathe of land on this side of Yate subject of objections seeking its identification for development. For the reasons given in the strategy section of my report and in the other items relating to Yate omission sites I do not support the allocation of land on the north side of Yate.

Recommendation

108.2 I recommend that no modification be made to the local plan.

109. Yate - Greenways Road

Objection

268/009 Heron Land Developments Ltd H02 (Settlement Boundary)
462/001 Hatfield Developments H02 (Settlement Boundary)

Issue

Should the settlement boundary include land east of Greenways Road?

Reasoning and conclusions

109.1 These objections relate to all or part of the land east of Greenways Road. This land was included within the settlement boundary in the 1990 local plan, but has since, through
the draft Northavon local plan and this plan been excluded, with the boundary being moved to Greenways Road. I agree with the council that Greenways Road represents a more logical and appropriate boundary in landscape terms. The site occupies land between the existing edge of development and the embankment to the quarry to the east. The boundary of the land is marked by substantial trees and overgrown hedges, with some open land contained within the site. From the road this stretch of trees and bushes creates an attractive setting for the housing development on the west side of the road. The road appears as the natural break between development and the rural area. To allow for development on the east side of the road would breach this feature and would seriously diminish the character and appearance of this edge of Yate.

109.2 I have not found the need to identify sites in and around Yate in order to meet the housing requirements of the district. If sites did need to be defined there seems to me better options than extending development across the road onto this land.

**Recommendation**

109.3 **I recommend that no modification be made to the local plan.**
CHAPTER 9 - TOWN CENTRES AND RETAILING

1. Proposals Map

Objection
286/006 Prudential Assurance Company Ltd and JT Baylis & Co Ltd

Issue
Should the Cribbs Causeway Retail Park recognise the planning permission for retail foodstore development on land at Lysander Road/Merlin Road?

Reasoning and conclusions
1.1 The council recognises that extant planning permissions exist for retail development at Cribbs Causeway. However, the council’s acceptance that the land at Lysander Road/Merlin Road should be withdrawn from the employment safeguarding area does not automatically mean that the permission referred to by the objector should be identified on the Proposals Map as a recognised retail location where further retail floorspace could be provided under Policy RT6. There is no justification to set out the extent of extant permissions, particularly where they may conflict with the council’s emergent policy.

Recommendation
1.2 I recommend that no modification be made to the local plan.

2. Policy Omission

Objection
43/002 Wyevale Garden Centres Plc

Issue
Should the Plan contain a policy specifically allowing suitable development of garden centres?

Reasoning and conclusions
2.1 It is for the local planning authority to decide for itself what topics should be addressed by the policies in its local plan. Only policies dealing with significant local planning issues should be included. Garden centres may contribute to the local economy and provide employment opportunities as suggested. However, they can also become significant commercial operations, generating high volumes of traffic and there is an increasing tendency for garden centres to sell a wide range of goods, which if uncontrolled could lead to competition with existing shops and stores in nearby towns and villages. The council in its response states that the objector does not present any compelling evidence to support the view that garden centres should be treated as a special case distinct from other forms of retailing which are subject to the sequential test. Policy E7 on farm diversification is also relevant. I concur with this and recommend no change to the local plan.

Recommendation
2.2 I recommend that no modification be made to the local plan.
3. Paragraph 9.3 - Strategy for Town Centres and Retailing

Objection

130/003 Marks & Spencer Plc 9.3

Support

431/535 Friends of the Earth 9.3
431/082 Friends of the Earth 9.3

Issue

Should the word “cautiously” be deleted from the third bullet point of paragraph 9.3?

Reasoning and conclusions

3.1 The council acknowledges that the word “cautiously” may be superfluous on the basis that where an assessment is made of a proposal, it is implicit that the assessment will be cautious, rigorous and thorough. However, as the intention here is to clarify that the council will exercise particular care in considering proposals that may affect the vitality and viability of existing centres in line with government advice I consider that its use is justified. Paragraph 9.3 would still allow for the development of appropriate out-of-centre public facilities in accordance with the Joint Replacement Structure Plan and PPG6 and I find no reason to delete it.

Recommendation

3.2 I recommend that no modification be made to the local plan.

4. Paragraph 9.5 - Town Centres and Retailing: Context

Objection

406/005 Sainsbury’s Supermarkets Ltd 9.5

Issues

Should the centres identified in the plan be separated into either ‘town centres’ or ‘district centres’ according to their role?

Should town and district centre boundaries be identified on the Proposals Maps?

Reasoning and conclusions

4.1 National guidance on town centre and retail policy is set out in PPG6, with Annex A of PPG6 defining town centres as being areas which provide a broad range of facilities and services and which fulfil a function as a focus for both the community and for public transport. Paragraph 9.5 of the plan relies upon this definition but Policy RT1 relates to frontage areas rather than attempting to separately identify wider town centre boundaries.

4.2 The council’s approach stems from the various local plans that it has inherited, none of which identify town centre boundaries. The council accepts that the defined frontages within these plans are primarily retail in character but considers that they have proved a reasonable proxy for the core town centre for the application of the sequential approach to site selection introduced in PPG6. The council highlights the difficulties in defining readily identifiable, meaningful, consistent and agreeable boundaries and does not consider that its approach has resulted in any operational difficulty.
4.3 I consider however, that such an approach is likely to cause a significant amount of confusion in the interpretation of the local plan and particularly with regard to its relationship to national guidance. PPG6 places its focus on town centres and not primary shopping areas or retail frontages. To treat the defined ‘primary shopping area’ as the town centre in terms of PPG6 would be confusing and wrong. Similarly the nomenclature used by the Council in identifying the hierarchy of town, district and local centres is not clear and does not follow the approach set out in the JRSP. The council should therefore reassess its approach to town centres and it should define town centres within the terms set out in PPG6.

4.4 Within each town centre the primary shopping frontages and secondary shopping frontages should be defined, enabling the council to assess “edge of centre” locations, and enabling users of the plan to apply the sequential approach to site selection as set out in PPG6. Bearing in mind the need to adopt a plan for the district as swiftly as possible, the council may find that this task would be best accomplished as part of the preparation for the forthcoming Local Development Framework. The issue could be addressed through the production of a Supplementary Planning Document under the new system, rather than by modifying the current plan. In the interim, the council might consider whether the production of Supplementary Planning Guidance to provide the necessary advice in advance of the adoption of a statutory DPD would be feasible and helpful.

Recommendation

4.5 I recommend that the boundaries of town centres should be assessed and defined in accordance with the definition of town centres contained in PPG6 and the Inset Maps amended accordingly in conjunction with the preparation of Development Plan Documents as part of the forthcoming Local Development Framework. Such guidance might be adopted as SPG until the adoption of a statutory DPD.

I further recommend a note to this effect should be included within the plan.

5. Figure 9.1 – Established town/district and local centres within the urban area and the larger settlements of South Gloucestershire

Objections

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Issues

Should the retail section be split into a section on town centre strategies and a separate section on retailing so that the use of town centres, as opposed to their retail function, becomes centre stage? Is there a need for policies to encourage shops which are of more practical use to local residents (and reduce the need to travel)?

Should figure 9.1 include the Westerleigh Road Stores and ancillary retailing?

Should Figure 9.1 be revised to include the local centres that exist in settlements such as Charfield?
Reasoning and conclusions

5.1 A number of objectors raise concerns about the amount of support offered to local shopping parades within the plan, with particular reference to Heron Way and Abbotswood shopping centres, near Yate. It is argued that these shopping parades have lost much of their local retail viability over the years, and the plan should do more to recognise and protect their importance as retail focal points for local communities. Local plan objectives for town centres and retailing seek to retain and enhance local and village shopping centres/parades and individual convenience shops to serve local needs. However, it is not possible to ensure that shops stay open or to determine the range of goods sold through the planning system. Economic mechanisms are more relevant here and such matters lie beyond the remit of the Local Plan.

5.2 The council has put forward some suggested changes to the plan, PCs 150 and 151, to help address objectors’ concerns. These include the amendment of criterion A of Policy RT10 to additionally refer to the social function of a centre and the revision of paragraph 9.100 to state that “Shops also provide a communal focus for local people.” These changes are helpful and would highlight the value of retail centres as local community focal points and the plan should be modified accordingly.

5.3 Given the close proximity of the two shopping centres to the main Yate Shopping Centre, concern is also expressed about the wording in paragraph 9.105 of the plan, which allows for the loss of a retail unit where alternative services are available within a town centre up to 1km distant. This could be an obstacle to local regeneration and the council, by way of PC152, proposes to delete this sentence from the plan. I consider this to be reasonable, but I agree with the Council that only the penultimate sentence of this paragraph should be removed so that the circumstances under which proposals for change of use will not be permitted remain clearly stated within the 400m guide.

5.4 Objectors are also concerned about the status of Westerleigh Road Stores in the plan. Information presented at the inquiry has clarified that the site, which used to house one suburban shop, now houses a supermarket, garden centre and hairdresser and it was argued that the site has in effect become a local centre. The council originally felt that since Westerleigh Road only had a limited number of stores, and did not form a recognisable parade or local centre, it should not be included in the Plan. However, the council has now proposed a change to the plan, PC149, suggesting the inclusion of Westerleigh Road Stores as a new item 50 on the list of local centres in figure 9.1. This would meet the objection and I conclude that the plan should be amended accordingly. For reasons of consistency, I also suggest that paragraph 9.7 be updated, to refer to 50 local centres within the urban area and larger settlements rather than 49.

5.5 Paragraph 9.7 of the plan makes clear as does the council in its response that figure 9.1 relates to local centres within urban areas and the larger settlements of the District. It is not intended as an exhaustive list of all local centres and does not include those in rural areas. It is a source of information and the omission of Charfield and other village centres does not impact on the council’s policy for village centres set out in Policy RT10. In the light of this and the need to keep the plan as concise as possible, I conclude that there is no need to include other local centres in the plan.

Recommendation

5.6 I recommend that the local plan be modified

i) in accordance with PCs149 to PC152, and

ii) by the modification of paragraph 9.7 to refer to 50 local centres.
6. Policy RT01 – Development in town/district centres

Objections

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<th>Objection</th>
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<tr>
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<td>Asda Stores Ltd</td>
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Support

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<tr>
<td>431/083</td>
<td>Friends of the Earth</td>
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Issues

Should the Asda store at Longwell Green be identified as a District Centre?

Should the full extent of town centres be defined in the plan and identified on the proposals map?

Does criterion A and supporting paragraph 9.16 adequately reflect guidance in PPG6?

Is criterion B appropriate, given that town centre strategies have no formal status?

Is criterion E appropriate to this general policy?

Should Policy RT1 recognise the role that edge of centre retail development can play in strengthening existing centres?

Reasoning and conclusions

6.1 I find no justification for the Asda store at Longwell Green to be identified as a district centre. Annex A of PPG6 clearly defines district shopping centres as being groups of shops, separate from the town centre, usually containing at least one food supermarket or superstore, and non-retail services such as banks, building societies and restaurants. Although the Asda store may be providing a range of non-retailing services, access to ATMs, in store restaurant, travel agency and pharmacy, this is typical of a superstore and it does not fall within the definition of a district centre provided in PPG6. In terms of policy approach the council raises a valid point that the identification of Asda and similar free standing stores as district centres would have implications for the vitality and viability of established centres. It is therefore right that the Asda store be considered under Policy RT5 as an out of centre development rather than as a town or district centre under Policy RT1.

6.2 I agree that town centres should be defined in a plan and identified on a proposals map and I draw attention to my conclusions and recommendations in respect of a similar objection to paragraph 9.5 of the plan. The reliance of Policy RT1 on retail frontage areas as a proxy for core town centres for the application of the sequential approach to site selection in PPG6 is unacceptable and confusing. PPG6 places its focus on town centres and not primary shopping areas or retail frontages and the council should reassess its approach, defining town centres within the terms set out in PPG6.

6.3 Objectors to criterion A believe that the criterion does not reflect the council’s positive objective in paragraph 9.16 for new development. The phrase “or any part of it” is considered to be unreasonable on the grounds that development which makes an important and valuable contribution to the overall vitality and viability of a centre will often have some negative impact. I note that the Revised Deposit Draft has provided the opportunity to partly meet these objections through the redrafting of criterion A in a more positive light. However, I
consider that the phrase “or any part of it” is overly onerous and does go beyond government advice in PPG6. It should be deleted. The Policy and supporting text would then provide a positive framework to sustain and enhance the vitality and viability of town centres, whilst maintaining an efficient, competitive and innovative retail sector as is intended in paragraph 1.1 of PPG6.

6.4 Criterion B of Policy RT1 seeks to ensure that development is consistent with the scale and function of a centre and compatible with the relevant town centre strategy. PPG6 highlights the important role of town centre strategies in enhancing town centres and paragraph 2.10 of the PPG states that they should be translated into the development plan at the first opportunity. However, this does not mean that there should be a policy requirement to comply with these strategies as although they may provide essential background and context to the consideration of a proposal, the weight attached to a strategy will vary depending on its state of preparation and the extent to which it has been subject to public consultation. The purpose of such strategies when translated into supplementary planning guidance, is to help an authority elaborate its local plan policies, but it is not part of the statutory development plan. I therefore conclude that the reference to town centre strategies be deleted from criterion B. It would however, be useful if attention was drawn to the role of town centre strategies in the supporting text instead.

6.5 Concerns are raised about the issue of first floor uses (criterion E of Policy RT1) and I draw attention to my conclusions and recommendations on the related objection to Policy RT11. I consider criterion E to be reasonable, given the importance attached to the promotion of a diversity of uses and mixed use development, particularly that including housing in PPG6. However, I consider that the words “where reasonable and appropriate” should be deleted, since they introduce an element of vagueness and lack of clarity in the policy text. The criterion still allows for alternative uses where satisfactory living accommodation cannot be provided and does not preclude other uses as suggested by the objector.

6.6 The council accepts that edge of centre retail development can help to consolidate a local centre. However, there is no need to amend Policy RT1 as requested by the objector since the revised Policy RT5 allows for edge of centre retail development where a need can be shown (subject to my recommendations set out under RT5). There are different considerations to be given to preferred locations for retail development and it is reasonable for the council to separate them into different policies. The plan should be read as a whole.

6.7 The council has put forward an additional suggested change, (PC227). This clarifies in paragraph 9.58 that the Policy is intended to apply to all uses generally considered suitable for town centre locations as identified and listed in national policy. This is reasonable and the plan should be modified accordingly. Similarly, the plan should be modified as set out in PC221.

Recommendation

6.8 I recommend that the local plan be modified

i) by the deletion of the words “or any part of it” from criterion A.

ii) by the deletion of the words “and compatible with the relevant town centre strategy” from criterion B,

iii) by the addition to paragraph 9.24 of a reference to the need for development proposals that are being considered under Policy RT1, to be compatible with relevant town centre strategies.

iv) by the deletion of the words “where reasonable and appropriate” from criterion E.
v) in accordance with PC221.


Objections

29/507 Mr G Lanfear RT02 9.35
283/090 Government Office for the South West RT02
353/001 Concern for Thornbury RT02 9.031-9.039
353/002 Concern for Thornbury RT02 9.039
382/002 Wm Morrison Supermarkets Plc RT02 9.035 & 9.036
406/003 Sainsbury’s Supermarkets Ltd RT02
431/084 Friends of the Earth RT02

Support

314/003 Tesco Stores Ltd RT02 9.036
374/002 Thornbury Town Council RT02

Issues

As the Thornbury market site is a relatively small area of land, should the council identify further sites in the area and allocate additional land for housing purposes?

Should the Policy define what is meant by an ‘appropriate mix’ of uses and provide greater clarity about what is proposed at this site?

Should the provision for car parking be carefully considered taking account of the existing accessibility of the town centre by public transport, cycle and on foot?

Should the whole area for possible redevelopment be included in the Policy or alternatively an additional policy including the school site, community buildings, police station and cattle market?

Does the reference to art in paragraph 9.39 go far enough in terms of contributions of development to community facilities?

Should criterion A of Policy RT02 and supplementary text be amended, allowing the site to be allocated for town centre uses in general rather than the limited range currently referred to?

Is it right that Policy RT2 should preclude retail development, given its identification as a town centre site, which would be the preferred location for retail development?

Is the inclusion of car parking necessary and does it conflict with objective 4 of paragraph 6.16? Should the policy rather than the supporting text explicitly state that the development should be at high density?

Reasoning and conclusions

7.1 Mr Lanfear raises specific concerns about the last sentence in paragraph 9.35 of the plan. This states that residential use on the site may include a nursing home or similar high density or sheltered development. The objector contends that the former Market site is a relatively small area of land and that the Council appears to indicate that any existing shortfall of housing and community facilities required for the whole of the Thornbury area can be accommodated within this site. The council has since clarified at the inquiry that the additional sentence in paragraph 9.35 was added in response to the objector’s request for a site to be identified for a further private residential home in the Thornbury area in the First Deposit Draft of the plan. However, in adding this text, the Council makes it clear that it is not indicating that all future housing and community development will be confined to this one particular site.
While no other sites have been specifically allocated in the plan for Thornbury, the plan should be read as a whole, and there are a number of Policies which would allow for such development to come forward on as yet unidentified sites within the defined settlement boundary at Thornbury. I comment further in chapters 2 and 8a on housing development in and around Thornbury. No modification to the plan is needed in response to this objection.

7.2 Policy RT02 has been drafted to identify the former Market site for redevelopment without being overly prescriptive in the form it should take. This is reasonable, since in formulating the Policy, the council has made provision for a flexible mix of uses that it believes will enhance the town centre and provide for community needs. The Policy clearly states that the mix of uses will include community, residential, leisure, commercial and car parking uses and this is amplified in the supporting text in paragraphs 9.31 to 9.39. The precise balance of uses would be better established as part of an agreed development brief for the site, as set out in paragraph 9.35 of the supporting text, rather than set out as a specific statement in the local plan. I agree that the provision for car parking should be carefully considered taking account of the existing accessibility of the town centre by public transport, cycle and on foot. The council is aware of this and appropriate provision has been made in criterion D of Policy RT02 in the plan.

7.3 The council takes the view that the former Market site would not be appropriate for retail use because of the threat that this would pose to the vitality and viability of the nearby St Mary Centre. Existing retail stores within the Centre, together with the Tesco Store out of centre are considered sufficient to meet most retail demand in Thornbury, although there is scope for some expansion of the retail core to meet future needs. This need however, should not be met east of Rock Street, which is recognised as a physical barrier between the core shopping areas and major car park. The location of a new retail store in this location some distance from the Centre would be likely to have the effect of diluting the retail core of the town rather than reinforcing it. The council’s reasons for omitting retail uses are further amplified in paragraph 9.36 of the plan and I concur with this. There is no need to amend criterion A to include retail or refer to general town centre uses as requested.

7.4 The council accepts that there is a need and scope for a comprehensive solution to the redevelopment of land in Council ownership to the east of Thornbury Town Centre and this is reflected in paragraph 9.35, which refers to links with redevelopment on related sites. The precise area available for redevelopment is a matter of separate study by the council and will be subject to public consultation. It would be inappropriate to predispose the outcome of this study by identifying a larger site within Policy RT02.

7.5 The plan should be read as a whole and I am satisfied that Policy RT02 together with other Policies such as LC1 and LC2, which relate to the provision of community facilities and developer contributions, will ensure that community gains are maximised as part of any redevelopment of the former Market site.

7.6 As regards arguments that car parking is an inappropriate use for the Rock Street Cattle Market Site and the fear that Policy RT02 would permit a low density development near a town centre, contrary to the sustainability aim of the plan, I understand the objector’s concerns. Principle 2 in paragraph 2.5 of the plan seeks to shape new development patterns in ways which minimise the need to travel by private car, a key tenet of government policy. However, I do not consider that Policy RT02 would preclude high density development as suggested. Paragraphs 2.27 and 2.31 of PPG6 highlight the need for local authorities to draw up traffic management strategies and provide good quality car parking to ensure that town centres can compete effectively with out-of-centre developments, whilst promoting the use of public-private partnerships. The requirement in Policy RT02 for a mix of uses including car parking uses will help to ensure that the Policy and supporting text reflect national, regional and structure plan requirements.
7.7 This is a key site and whilst the council supports the principle of restraint on car parking, this has to be balanced against the likely impact on social and economic activity. It is suggested that there is already adequate car parking around Thornbury town centre but no specific evidence has been provided to support this claim. I also have no evidence before me to suggest that in the context of Thornbury, that suppression of parking provision will result in alternative modes of transport being brought forward. The council points out that the likely consequence would be increasing frustration on market days which would be a barrier to the achievement of wider economic and environmental objectives. In addition, there is a possibility that undue restrictions on local parking may undermine local economic and sustainability objectives by deflecting trade to competing centres and out of town stores, particularly in the North Fringe, where parking space is often freely available. The request for car parking to be explicitly excluded from the site is therefore unrealistic and the reference to car parking in the Policy and supporting text should remain in the plan.

Recommendation

7.8 I recommend that no modification be made to the local plan.

8. Policy RT03 and Paragraphs 9.40-9.48 – Land to the east of Link Road, Yate

Objections

3/004 Somerfield Stores Ltd RT03
180/055 Joint Parishes Consultative Committee RT03
181/058 Yate Sodbury Liberal Democrats RT03
182/058 Yate Town Council RT03
254/055 Sodbury Town Council RT03
266/011 MEPC Ltd and The Charterhouse Shopping Centre Fund 2 RT03 9.73
266/020 MEPC Ltd and The Charterhouse Shopping Centre Fund 2 RT03
266/021 MEPC Ltd & The Charterhouse Shopping Centre Fund 2 RT03 9.40-9.48
266/022 MEPC Ltd & The Charterhouse Shopping Centre Fund 2 RT03 9.40-9.48
283/091 Government Office for the South West RT03
283/093 Government Office for the South West RT03 9.43
299/057 Westerleigh Parish Council RT03
300/056 Dodington Parish Council RT03
314/001 Tesco Stores Ltd RT03 9.45
382/003 Wm Morrison Supermarkets Plc RT03 9.41 & 9.45
406/004 Sainsbury’s Supermarkets Ltd RT03

Support

314/004 Tesco Stores Ltd RT03
314/501 Tesco Stores Ltd RT03
379/502 NHS Estates South West Region RT03 9.42
380/505 South Gloucestershire Primary Care Trust RT03 9.42

Issues

Should the Policy be reworded to give more specific, up-to-date advice to suitable uses, including retail and community uses?

Are the criteria unnecessarily detailed and restrictive?

Should the plan refer to the MMI and rapid transit?

Do the boundaries of the site reflect the land that is available for development?

Is the reference to the 1997 Town Centre Strategy appropriate as it has no formal status and reliance on the strategy may unnecessarily restrict future development proposals?
Reasoning and conclusions

8.1 Policy RT03 identifies land to the east of the Link Road for car park and amenity land and allows for development of part of the site in accordance with criteria A to F reflecting the Yate Town Centre Vision (CD073) and drawing attention to various site constraints. Any development on this site must be seen in the context of the town centre as a whole and the supporting text refers to the council’s strategy of concentrating new development within the core area west of the Link Road and of using land east of the Link Road to meet car parking and open space needs. This is recognised in criterion D of the Policy, which acknowledges that development west of the Link road could be facilitated by this site, enabling more effective use to be made of that land. In the light of this strategy and in the absence of any specific evidence for a need for retail or any of the other uses sought by objectors, (the council considers that current projections of retail needs can be met within the core retail area and alternative sites are available to meet residential and employment needs) the Policy should generally remain as drafted.

8.2 Paragraph 9.45 does not preclude retail uses but states that it would be inappropriate to allocate for such uses until opportunities to consolidate the retailing function of the core town centre have been fully realised. The site may also contribute to retail development by providing parking space to serve the core retail area. The council recognises in paragraph 9.48 that objectives for the town centre would best be resolved through the preparation of a Concept Statement and ultimately a development brief for the whole site, as resources become available. The council’s aim is to allow for flexibility to meet community needs as they are identified and it would therefore be unwise to be more specific at this time. Furthermore, the criteria in the Policy allow for the consideration of any suitable proposals for development that might emerge in the future, should a need be identified, in the context of the site constraints that apply. I do not support the changes put forward by the objectors, neither do I agree that the criteria are unnecessarily detailed or that they could constrain appropriate development. Insufficient justification has been brought forward to release the site for any particular form of development at this stage and the wording of the Policy is consistent with the council’s view that this is currently an edge-of-centre site (separated from the core retail area by the Link Road) within the terms of the sequential approach to site selection outlined in PPG6.

8.3 However, the Council does accept that the Policy and text will need to be updated with new information pending the outcome of the Inquiry and other ongoing developments, and any such refinements should be made at the earliest opportunity to provide help and assistance to users of the plan.

8.4 In the meantime, I concur with the additional suggested changes put forward by the council at the inquiry, namely PC154 and PC155. These are reasonable since they update the supporting text in terms of the strategy and vision for the area and would help to meet some objectors concerns. I do not, however, endorse PC153 as I find no reason why the Policy should make a specific reference to the development of a “small” part of the site. It would be clearer if the text simply referred to a proposal for development of the site, rather than the current reference to “part of the site” or a “small part” of it. This wording is unnecessary, given the protection provided in the Policy by criteria A to F.

8.5 The plan should be read as a whole and the multi-modal strategy referred to by objectors is considered in detail in the Transport Chapter of the plan, with an explanatory reference to it at paragraph 9.43. Paragraph 9.43 simply draws attention to the fact that the council is investigating the possibility of a rapid transit route although the council may wish to delete this reference and update the text appropriately bearing in mind my recommendations on that topic.

8.6 Concern is expressed that the area covered by RT03, as currently represented on the Proposals Map, does not reflect the full extent of the area available for what should be
comprehensive redevelopment. The land in question relates to the area fronting Station Road and the stream side area. The council explains that the Station Road frontage was excluded from the Policy because its availability was uncertain at the time the Policy was formulated. It accepts that the area offers some potential for redevelopment as a brownfield site and it is an important strategic location at a major crossroads. However, this does not automatically mean that the site should be included in the Policy area. The council has not had the opportunity to investigate potential site constraints or land use options in any detail and whilst recognising the potential benefit of an integrated approach to this site and the RT3 site, it does not consider that it should be bound together in a single policy. The streamside area is located between the River Frome and the main roads, Link Road and Kennedy Way. It is heavily constrained by flooding and wildlife issues and the council considers that there is no merit in adding it to the area covered by RT03. I find the council’s approach to be reasonable, given these circumstances and conclude that no modifications should be made to the site boundaries as requested.

8.7  The Revised Deposit Draft Plan has provided the opportunity to delete the references to the 1997 Town Centre Strategy in criterion A and criterion D. There is no need to delete the criteria from the Policy. However, PPG6 makes it clear that town centre strategies should be translated into development plan policy at the earliest opportunity. It is therefore right that the issues and aspirations for the Vision for Yate Town Centre should be highlighted.

Recommendation

8.8  I recommend that the local plan be modified

i) by the rewording of the second sentence of Policy RT03 as follows: “A proposal for development of the site will be permitted provided that:”

ii) in accordance with PC154 and PC155.


Objections

| 283/094 | Government Office for the South West | RT04 |
| 431/085 | Friends of the Earth | RT04 |
| 486/001 | Mr M Jones | RT04 |

Support

| 314/002 | Tesco Stores Ltd | RT04 9.52 |

Issues

Should the Policy be redrafted to clarify what is proposed at this site and define what is meant by an ‘appropriate mix’ of uses and does it ensure that development is consistent with the scale and function of the proposed centre?

Should the proposals for car parking in the development be deleted as it is unnecessary and contrary to objective 4 of paragraph 6.16?

Should the extent of the proposed town centre for Bradley Stoke be extended to cover this site, given its permission for residential development?
Reasoning and conclusions

9.1 On the first issue, it is reasonable that Policy RT04 has been drafted to identify the site for development without being overly prescriptive in the form it should take. The Policy provides for a flexible mix of uses aimed to meet community needs and to be of a scale and form appropriate to the centre. The precise balance of uses would be better established as part of an agreed ‘Concept Statement’ and Development Brief for the site, as set out in paragraph 9.53 of the supporting text, rather than as a specific statement in the local plan. The Policy clearly states that the mix of uses will include retail, community, open space, residential and car parking uses and this is elaborated on in the supporting text in paragraphs 9.50 to 9.57. No modification is necessary in response to 283/094. However, I support the council’s additional Proposed Change put forward in PC218, which replaces the words “an appropriate” with the word “a” instead. This is reasonable and the plan should be modified accordingly. On the same basis I propose the deletion of the words "where reasonable and appropriate" from criterion C.

9.2 I do not consider that Policy RT04 conflicts with transport objective 4 of paragraph 6.16 of the Plan, nor does it preclude high density development as sought by the objector. Paragraphs 2.27 and 2.31 of PPG6 highlight the need for local authorities to draw up traffic management strategies and provide good quality car parking to ensure that town centres can compete effectively with out-of-centre developments, whilst promoting the use of public-private partnerships. The requirement in Policy RT04 for a mix of uses including car parking uses will help to ensure that the Policy and supporting text reflect national, regional and structure plan requirements. The Policy also seeks integration with adjoining development in terms of layout, design and access for pedestrians and cyclists and the council has also stated its intention to seek contributions towards the implementation of public transport improvements based on the need arising from the development.

9.3 The council has clarified in its response that additional land has been allocated (Policy RT04) as a result of the recommendations set out in the Joint Retail and Leisure Study 1997 (as set out in paragraph 9.52 of the Plan) and has been endorsed by Bradley Stoke Town Council with the objective of securing a town centre capable of meeting the needs of local residents. I note the objector’s concerns about housing provision and I draw attention to my conclusions on the council’s housing strategy elsewhere in this report. Policy H1 identifies how the council intends to meet the strategic requirement for housing as set out in the Joint Replacement Structure Plan. The council also draws attention to other policies in the Plan such as Policy D1, Design and Policy RT1, which seek to ensure that residential amenity is not prejudiced by new development. In the light of this, no modification should be made to the plan.

Recommendation

9.4 I recommend that the local plan be modified

i) in accordance with PC218, and

ii) by the deletion of the words "where reasonable and appropriate" from criterion C.

Objections

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Issues

Does the policy give clear and reasonable advice for out of centre developments, that accords with national guidance, including reflecting the sequential approach?

Should the policy refer to intensification of retail uses?

Should proposals have to be considered in terms of their impact upon local plan proposals?

Should the policy relate to all town centre uses?

Does the plan adequately meet identified retail needs?

Does the plan give due prominence to the question of meeting need?

Does the plan adopt a reasonable size threshold?

Is criterion E reasonable in its requirements?

Should there be a policy specific to garden centres?

Does the plan unreasonably preclude minor changes or remodelling of stores?

Reasoning and conclusions

10.1 Local plan strategy as described in the council’s Topic Paper TP7 is generally permissive of retail development in town centres (Policy RT1) and is restrictive of out of centre development (RT5) except where it is for the sale of bulky goods that cannot easily be sold
from a town centre site (RT6). This approach is generally in line with government advice in PPG6 and I consider below in response to the objections, whether this approach has been adequately translated into local plan policy.

10.2 The council’s interpretation of national and regional policy is questioned in a number of objections. Some argue that proposed policies are unduly restrictive of out-of-centre retail development and will consequently undermine retail choice and fail to secure desirable environmental and transportation benefits within the retail parks. Others express concerns at the lack of clarity within the policies and to the appropriateness of text relating to the Vision for the North Fringe. The council has since attempted to clarify Policies RT5 and RT6, putting forward some additional Proposed Changes.

10.3 Policy RT5 seeks to resist large-scale retail development outside the identified town centres. However, it makes provision for such development to be permitted, exceptionally, if certain criteria are met. The criteria reflect the objectives of PPG6 and Policy 40 of the JRSP. The council states that Policy 40 specifies the limited circumstances in which new retail provision may be made outside defined centres (which exclude Cribbs Causeway). First, there must be an identified need for the development. Second, there must be no suitable sites in which the need could be met within the defined centres. Third, the development must have no unacceptable implications for the regeneration, vitality or viability of the defined centres. Fourth, the development must serve to minimise travel demand and facilitate access by modes of transport other than the private car.

10.4 It is firstly necessary to consider whether Policy RT5 is in line with the sequential approach to site selection as set out in PPG6. I agree with the view that town centre and district centre boundaries should be identified on the Proposals Map and I draw attention to my recommendations in respect of similar objections to the plan under Policy RT01. The council’s reliance upon primary and secondary frontages equating to the core retail area of a town centre is not practicable and would make the application of retail policies in the plan very difficult. Recognising that Policy RT5 needed to be redrafted to more closely reflect the sequential approach in PPG6, specifically in relation to the council’s placement of local centres ahead of edge-of-centre sites, the revised deposit draft plan and subsequent proposed changes, PC177 (which supersedes PC91), PC178 and PC224, have been put forward, providing greater clarity, aiding users of the Plan in correctly setting out the sequential approach.

10.5 The Policy as originally drafted sought to control intensification of retail uses and since there can be no planning control over the intensification of use of retail floorspace, the word “intensification” was removed from RT5 at Revised Deposit Stage. The council does however, propose, in PC224, that the principal intensification issue is one of increasing useable retail floorspace and suggests that this would best be addressed within Policy RT5 by the introduction of text drawing heavily on Draft PPS6. Whilst I recognise that PPS6 is only published in draft form, and as such can be given little weight, there is nothing in the amended policy that is contrary to extant guidance in so far as it applies to development requiring planning permission in some form subject to my comments below.

10.6 Concern is expressed that for a variety of reasons retail allocations may not come forward in the timescale of the plan and new proposals should not therefore be assessed against impact upon them. The council considers that it is reasonable and logical for proposals to be assessed against their impact on local plan proposals providing that the plan is up to date. It is important that this plan, and those of neighbouring authorities, are not undermined by ad-hoc development if allocations are not treated as a material consideration in the assessment of impacts. Accordingly, I recommend that no modification be made in response to this objection.
10.7 The government office notes that the sequential approach should apply to all key town centre uses “which attract a lot of people including commercial and public offices, hospitals, higher education and entertainment as well as retail and leisure”. It is also argued that this should be set out as Policy not in the supporting text. The Revised Deposit Plan has provided the opportunity to meet this objection through the amendment of paragraph 9.73, which is now more specific on the breadth of uses to which the sequential approach will apply. I am content with the council’s further suggested revision to Policy RT5, PC224, which paraphrases the list of uses in paragraph 1.7 of draft PPS6 and with PC227.

10.8 The government office also comments that where need does exist the plan should include specific proposals for meeting that need. The council addresses this in Topic Paper TP10, with the identification of need being addressed in the Halcrow Fox Study and individual studies for major centres. The council’s aim is to meet identified need without releasing out of centre sites, believing this is best exercised through strategies for individual centres. Although it is accepted that there is a need for DIY floorspace in the North Fringe area, this has been met by the recent decision of the First Secretary of State to allow a B+Q Warehouse. In this respect I consider the Council’s approach to be acceptable and that Policy RT5 is intended to ensure that there is a robust analysis of need and impact in such cases and bearing in mind my recommendations below, RT5 will enable this. Therefore there is no necessity for the Council to identify any specific proposals for meeting additional need.

10.9 I note the concerns raised that the plan deals with retail issues in a confused way. I find the existing structure acceptable in first defining town centres (RT1) then seeking to meet identified needs in specific centres (RT2-4) and then stating national policy (the sequential approach) for out of centre proposals in RT5 and RT6. Furthermore the revised wording put forward by the council for Policies RT5 and RT6 generally add further clarity subject to my recommendations below.

10.10 The government office also requests that it be made clear that the criteria based policy should only apply after need has been demonstrated. The plan as amended at the Revised Deposit Stage, and as clarified in additional Proposed Changes including PC225, states that need has to be demonstrated and the sequential approach to site selection followed. The objector also refers to the need for the Policy to ensure that any development is consistent with the scale and function of a centre. This is reasonable and the council has taken this point into account in its latest revisions to the Policy, PC222 and PC223.

10.11 At my request the council has also considered the use of the word “appropriate,” which appears in the introduction to Policy RT5. The council clarifies that the introduction to the Policy will be amended to establish that the Policy applies to a wide range of uses which should be accommodated in town centres (PC91 superseded by PC177). As I have stated above in relation to objections from the government office, I consider this to be reasonable, as is the council suggested amendment to paragraphs 9.18 and 9.73 to include “uses generally considered suitable for town centre locations as identified and listed in national policy.

10.12 Policy RT5 as currently drafted applies the sequential approach to retail and leisure developments over 500sq. m. Some objectors argue that this threshold is arbitrary, unsubstantiated within the policy and is too low, contrary to paragraph 4.13 of PPG6, which gives a 2500 sq. m threshold. I understand that the council’s initial intention was for the sequential approach to site selection to be applied to all relevant forms of development over 500sq.m gross floorspace. The council accepted that any threshold figure was likely to be arbitrary but considered that a low figure would allow flexibility in the siting of very small scale developments while allowing for the cumulative effects of individual schemes to be drawn into the impact assessment process. The council argues that this has worked reasonably well in practice with most developers being content to supply a reasonable level of impact information for their schemes.
10.13 However, the council now acknowledges that government policy is changing to state that the sequential approach should apply to all relevant development regardless of goods or scale. The council considers that the 2,500 sq.m threshold for impact assessments is likely to give way to an alternative mechanism for assessing proposals (paragraph 3.4 of Draft PPS6). In conclusion, the council accepts that the 500sq.m threshold for the application of the sequential approach and the government's current 2500 sq.m thresholds for preparation of impact assessments are arbitrary. It is argued that recent publications from ODPM appear to accept this principle and seek the application of the sequential approach to all development covered by the Policy statement. Whilst I accept that PPG6 sets a threshold of 2500 sq.m for requiring supporting evidence of retail impact, it also allows for this requirement to be applied to smaller developments in certain circumstances. Whilst I accept that Draft PPS6 can only be given limited weight, the council's requirement for all retail development to produce impact assessment information is not unreasonable, provided that information is related to the scale and kind of development. I consider that this is self evident from the Council’s amended paragraph 9.65, PC 226.

10.14 As regards criterion E, the council has attempted to encourage the provision and use of floorspace above shops for residential and/or other active uses throughout its retail policies and criterion E of Policy RT5 as originally drafted referred to the inclusion of residential accommodation where reasonable and practicable. The Revised Deposit stage provided the opportunity for the council to broaden Policy RT5 to allow for non-residential uses, and PC147 has removed the phrase “where reasonable and appropriate” from the criterion. Generally government guidance both in terms of PPG1 and PPG6 supports making the best use of available land. This approach was supported by the Inspector report into the recent appeal by B&Q. Given that other policies, particularly those relating to design, would protect development on upper floors that would be intrusive or otherwise harmful to amenity, I consider that it is reasonable for the Policy to initially make this requirement of all proposed retail development as the plan should be read as a whole. Where development on upper floors of buildings is otherwise acceptable it reasonable that the plan should require this. Therefore I consider that PC147 should be made.

10.15 Turning to other matters raised by objectors, Wyevale Garden Centres plc object to there being no specific policy or allowance for garden centre development and expansion, which it is argued would be in the interests of the rural economy. Concerns are raised about Policy RT5 as it seeks to limit out of town retail development particularly where it cannot be served by public transport, pedestrians, cyclists and the mobility impaired. It is argued that goods sold by garden centres tend to be bulky and so it is not always essential that they be linked to non-car modes of transport. However, I do not accept that criterion C of Policy RT5 should be made more flexible as this would be contrary to government sustainability objectives.

10.16 The use of the words “where appropriate” as suggested by the objector would also introduce an element of uncertainty and vagueness into the policy text. Furthermore, in the absence of any compelling evidence to support the view that garden centres should be treated as a special case distinct from other forms of retailing that are subject to the sequential test, I do not accept the new policy and supporting text put forward by the objector. Additional concerns are raised by Wyevale Garden Centres about the reference in paragraph 9.62 to the consideration of proposals for garden centres under Policy E7. The council has amended this paragraph but states that due to Proposed Changes, the focus of Policy E7 is on farm diversification. The Council states that proposals for garden centres should be considered within the retail chapter. Due to their scale, I concur with this approach. The Revised Deposit Plan has provided an opportunity to amend paragraph 9.91 to clarify this. I consider this to be sufficient.

10.17 A number of the objections relate to retail park policy and I deal with them in the next item, policy RT6.
10.18 Concern is expressed that paragraph 9.67 may preclude remodelling or minor extensions at The Mall, which would serve to improve its vitality and viability. It is felt that the text does not accurately reflect the conclusions of the Halcrow Fox Study, neither does it fully accord with the Joint Replacement Structure Plan. Policy EC6 of RPG10 is relevant here and the council argues that it places a complete embargo on any retail development at the regional shopping centre until Regional Policy is reviewed, providing a holding position until all relevant issues have been aired through formal review. Appropriate minor remodelling would however be permitted without compromising regional guidance. I consider that it is clear that paragraph 9.67 refers specifically to “further significant retail development” at Cribbs Causeway. This does not preclude minor remodelling or minor extensions. It is equally clear from Regional Planning Guidance that more significant development will not be permitted. I consider that the council’s suggested amendment to paragraph 9.66, and the amendments made at Revised Deposit helpful in this respect. Therefore no further amendment is necessary.

10.19 The council has also put forward some further Proposed Changes (PC148, PC179, PC180, PC181). These are reasonable since they add further clarity to the text. The plan should be modified accordingly.

Recommendation

10.20 I recommend that the local plan be modified in accordance with PC147, PC148, PC177 ( superseding PC91), PC178, PC179, PC180, PC181, PC222, PC223, PC224, PC225, PC226 and PC227.


Objections

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Issues

Is the policy in line with national guidance, including the sequential approach?

Is the plan clear and reasonable in how it treats retail parks?

Should the policy restrict redevelopment proposals of existing buildings?

Does the plan apply the right approach to the question of bulky goods?

Is the plan reasonable in referring to a strategy outside the local plan?

Does the plan adequately provide for the integration of the Cribbs Causeway retail area with its surroundings?

Should the Asda store be deleted from the retail park?

Should the land at Lysander Road/Merlin Road be included within the geographical definition of the Cribbs Causeway Retail Park?

Does the plan provide for too much car parking?

Reasoning and conclusions

11.1 Policy RT6 concerns proposals for development within existing out-of-centre retail parks, including those at Cribbs Causeway. The Policy seeks to ensure that new retail development in retail parks is limited to proposals for the sale of bulky goods. It also indicates that the development should make a positive contribution towards the appearance of the retail park, the circulation of non-vehicular traffic, and be accessible by a range of transport modes. A number of objections to Policy RT6 have been received and the council has since attempted to clarify this Policy, putting forward some additional Proposed Changes 182, 183, 228 and 229. I draw attention here to my conclusions in respect of the objections to Policy RT5, as these are relevant.

11.2 I first consider whether Policy RT6 is in line with the **sequential approach to site selection** as set out in PPG6. The government office questions whether Policy RT6 is contrary to paragraphs 1.10 and 1.11 of PPG6, believing the Policy to be wrong in allowing for out of centre development without the demonstration of need. The council explains that its original intention in drafting the Policy was to accept the presence of retail parks but to ensure that as far as possible they were restricted to the sale of ‘bulky goods’ which could not easily be located in town centres. Following Proposed Changes to both Policies RT5 and RT6 and paragraph 9.62 I consider that broadly speaking the Plan now correctly reflects PPG6 in respect to both the correct interpretation of the sequential approach and the identification of need for new development in existing retail parks. However, some amendment is necessary to PC182, for the reasons I explain in the paragraph immediately below.

11.3 Objectors raise concerns that RT5 and RT6 are in combination more restrictive of development in retail parks than free standing locations. The council accepts that the plan as originally drafted was unclear on the status afforded to retail parks within the sequential approach. The Revised Deposit stage provided an opportunity to correct this, placing retail parks ahead of free-standing locations in the sequential test at RT5X. However, subsequent objections point to a lack of clarity and possible contradiction in the policies as redrafted in that RT5 places retail parks within the sequential approach but RT6 still seeks to restrict sales to bulky goods items. Furthermore, following the parliamentary statement of 10th April 2003, the council admits that its approach in seeking to treat bulky goods as a special case for which out of centre provision should be made in retail parks designed for the purpose is no longer entirely consistent with government policy. The council has suggested a revised approach, seeking to direct all retail and similar investment to town centres (Policy RT5) but to set
specific criteria for development and redevelopment in retail parks where a proven need cannot be met in a sequentially preferable location (RT6). Whilst this is broadly acceptable I find that following PC182 criterion A of the Policy still specifically refers to the sale of bulky goods. Given the above this is not acceptable and I consider that this change should be amended.

11.4 As regards objectors concerns over the redevelopment of retail parks I find that the council is fully justified in seeking to limit development and redevelopment of floorspace within retail parks, where this redevelopment would require planning permission and if that development can be accommodated in sequentially preferable sites. This is in line with the parliamentary statement of 10th April 2003, which clarifies that even retail provision for the sale of bulky goods should follow the sequential approach. Whilst I recognise that environmental and transportation benefits may accrue from retail development, including redevelopment, these benefits are not sufficient to outweigh the general restraint which is to be applied to all out-of-centre retail development.

11.5 The council indicates that its definition of bulky goods in paragraph 9.77 of the Plan is consistent with the definition in Annex A of PPG6. However, it has accepted that the definition could be wider and proposes to substitute revised text (PC183). Although the text still refers to bulky goods, I consider that this is clearly only an example for one of the types of need that may not be able to be met in sequentially preferable locations and is acceptable. The council draws upon support for this approach in draft PPS6, and although I can give little weight to this document as it has not been formally adopted, I consider that the use of conditions to limit the range of goods sold and to control the mix of convenience and comparison goods is reasonable. However this explanatory paragraph does need some rewording as at present it gives the impression that these requirements would not apply to free standing locations which is clearly inconsistent with upper case Policies.

11.6 Concerns are raised that paragraphs 9.79A to D implies a strategy within and beyond the time-scale of the plan which conflicts with national and regional guidance in allowing for retail change at Cribbs Causeway. I find that the these paragraphs provide a useful signpost to the way the council envisages the future of Cribbs Causeway that does not undermine current restrictions on the growth of this centre and clearly recognises the importance of revisions to Regional Planning Guidance in this process.

11.7 Better integration between other developments in the North Fringe with Cribbs Causeway is sought by an objector. The plan refers to the need for Cribbs Causeway/The Mall to become better integrated with the neighbouring communities and developments. As the plan is highly restrictive of further development of Cribbs Causeway/The Mall in the plan period, I consider this to be sufficient.

11.8 I note that Revised Deposit Draft Plan has provided the opportunity to delete the Asda Walmart site from the wider retail park covered by Policy RT6 in response to the Asda Stores Ltd objection, confirming the store as a free-standing out of centre store. No further modification is necessary in response to this objection.

11.9 The council recognises that extant planning permissions exist for retail development at Cribbs Causeway. However, the council’s acceptance that the land at Lysander Road/ Merlin Road should be withdrawn from the employment safeguarding area does not automatically mean that the permission referred to by the objector should be identified on the Proposals Map. There is no justification to set out the extent of extant permissions, particularly where they may conflict with the council’s emergent policy. However, the council suggests that the B&Q site will have the character of a retail park and puts forward a proposed change (PC230) that would bring that part of the land removed form the employment safeguarding into the retail park. I am content with that change.
11.10 Finally, objection is made to the provision for additional car parking in Policy RT6 on the grounds that further development at the retail parks would continue to erode the viability of local town centres. It was argued at the Inquiry that the extensive free car parking would make it difficult to create the desirable high density low parking provision centres at Thornbury and Bradley Stoke. The plan, subject to my recommendations in this chapter, now clarifies the position of the Retail Parks in the sequential approach to site selection and is not generally permissive of new or unfettered out of town development and instead should help to strengthen the viability of traditional centres by restricting out of town sales. Specific car parking requirements for new development are adequately addressed in the plan’s transport chapter. I therefore consider that no additional modification is necessary.

11.11 I note that the council has suggested further minor amendments to the supporting text in PC228 and PC229. These are reasonable and I recommend that the plan be modified accordingly.

Recommendation

11.12 I recommend that the local plan be modified

i) in accordance with PC228, PC229 and PC230.

ii) in accordance with PC182 subject to the deletion of the words "in particular for bulky goods sales", and

iii) in accordance with PC183 subject to the deletion of the words "e.g. bulky goods sales".


Objections

180/056 Joint Parishes Consultative Committee RT09
180/057 Joint Parishes Consultative Committee RT09
180/058 Joint Parishes Consultative Committee RT09
181/059 Yate Sodbury Liberal Democrats RT09
181/060 Yate Sodbury Liberal Democrats RT09
181/061 Yate Sodbury Liberal Democrats RT09
181/508 Yate Sodbury Liberal Democrats RT09
182/059 Yate Town Council RT09
182/060 Yate Town Council RT09
182/061 Yate Town Council RT09
182/508 Yate Town Council RT09
254/056 Sodbury Town Council RT09
254/057 Sodbury Town Council RT09
254/058 Sodbury Town Council RT09
266/004 MEPC Ltd and The Charterhouse Shopping Centre Fund 2 RT09
266/005 MEPC Ltd and The Charterhouse Shopping Centre Fund 2 RT09 9.92-9.99
266/006 MEPC Ltd and The Charterhouse Shopping Centre Fund 2 RT09
283/101 Government Office for the South West RT09
283/102 Government Office for the South West RT09 9.99
283/513 Government Office for the South West RT09 9.99
299/058 Westerleigh Parish Council RT09
299/059 Westerleigh Parish Council RT09
299/060 Westerleigh Parish Council RT09
300/057 Dodington Parish Council RT09
300/058 Dodington Parish Council RT09
300/059 Dodington Parish Council RT09
507/501 Milburys Estate Agents RT09
Support
431/090 Friends of the Earth RT09

Issues
Should the strict controls on primary frontages be applied to and extended to the wider historic Chipping Sodbury Centre including the areas currently zoned as secondary frontages?

Should Station Road, Yate be reclassified as primary frontage?

Is there a need for a policy on change of use in secondary frontage areas?

Is Policy RT09, the supporting text and Appendix 16 too restrictive, to the introduction of supporting and complementary uses into town centres? Should the Policy be reworded and criterion A deleted?

Reasoning and conclusions
12.1 Regarding the first issue, local objectors sought the designation of parts of the High Street, Broad Street and Horse Street in Chipping Sodbury as primary shopping frontage. I note that the Revised Deposit Draft provided an opportunity to help address these concerns, attempting to provide a more coherent core retail area, with amendments to the High Street (south), Broad Street (south) and Horse Street (east) to become primary frontage. However, objectors have argued that these changes did not go far enough. In response, the council argues that there is not enough retailing within Broad Street (north) to warrant its designation as primary frontage. I concur with this. Although a very prominent frontage, with an important civic and townscape role, there are only a small number of A1 units here and their existence does not warrant the designation of the area as primary retail frontage. This particular part of the town does not have the character of a primary retail frontage and should remain designated as secondary.

12.2 Similarly, Horse Street, (east and west) excluding numbers 1-9 in the Revised Deposit Plan, does not have enough A1 units to justify its designation as primary retail frontage since it has a largely residential character interspersed with a few A1 units. I note the objectors concerns about the Post Office in Horse Street and I agree that it has an important role to play. However, the existence of the Post Office does not automatically mean that the frontage should be designated as primary. Furthermore, I do not agree that the change of use of nearby A1 units here would make the Post Office more vulnerable. The council does accept that retail frontages in Chipping Sodbury tend to be more fragmented than for other centres and it considers that the best way to address change in these areas is under Policy RT01 rather than as designation of wider areas of the town as primary frontage. I draw attention here to my conclusions and recommendations in respect of paragraph 9.5 and Policy RT01, where I conclude that town centres should be defined in the Plan. PPG6 places its focus on town centres and not primary shopping areas or retail frontages and the reassessment of the council’s approach within the terms set out in PPG6, together with a specific policy on secondary frontages as recommended below, should provide better protection for services such as the Post Office, as sought by objectors.

12.3 Local objectors concerns about the High Street (south) have largely been met with the designation of no’s 40-52 as primary retail frontage. I do not consider that the remaining part of the High Street (south), which is currently designated as secondary retail frontage, should be re-designated as primary. Although a prominent frontage, it does not have a strong retail character, being predominantly occupied by the Police Station, library, youth centre and Baptist Church. It should remain as currently designated in the Plan.
12.4 The frontage 40-52 High Street is also the subject of an objection by Milbury’s Estate Agents, who argues that the frontage is not suitable for primary retail frontage designation due to the high vacancy rate, inclusion of residential uses on the ground floor and lack of A1 retail offer. The council states that this frontage was included as a short extension to the primary retail frontage as it has a relatively high retail context for this particular town. I concur with this and, on visiting the town, found little evidence to support Milbury’s objection. The council also points out that the designation of this particular frontage will provide some overlapping with a length of primary frontage on the north side of High Street to provide a more logical core primary shopping area. This seems reasonable. The council believes that the objection stems from concerns about one particular unit that was the subject of a recent planning application for change to an A2 use. I emphasise here that Policy RT9 does not preclude change to non retail uses but sets out appropriate criteria for the assessment of any proposed change of use. No modification is necessary in response to this objection.

12.5 Local objectors also argue that Station Road in Yate should be reclassified as primary frontage. The Station Road area contains a variety of shop units, service and community uses interspersed with residential properties. Whilst this was the original service centre for Yate, it now functions mainly as a local centre serving neighbouring residential areas. As it does not function as the town’s primary shopping area, the council considers that it would be inappropriate to designate it as primary frontage under Policy RT9 and I concur with this. RT10 already provides adequate protection for the existing retail units in Station Road, being generally restrictive of the change of use of existing shops. However, the objectors’ request for the supporting text to be updated to more closely reflect the aspiration of the Yate Town Centre Vision for the area is reasonable. The need to improve accessibility of Station Road from the train station and to the shopping centre has been recognised by the council in changes introduced at the Revised Deposit stage, with paragraphs 9.27 and 9.27A, and the last bullet point to paragraph 9.41 being amended. The council has also put forward further proposals to amend these paragraphs in response to other objections concerning the vision for Yate town centre. The revised text set out in PC154 and PC155 more accurately reflects the aspiration to better integrate Station Road into the town centre and I draw attention to my recommendations on Policy RT03 elsewhere in this report, where I conclude that the plan should be modified accordingly.

12.6 In terms of secondary frontages, the council rely upon Policy RT01, which applies to all retail, and paragraph 9.94 and 9.99 for an explanation of the council’s approach. I appreciate that the council is aiming for greater flexibility in secondary frontages to accommodate a range of uses that are appropriate to a town centre, as referred to in Annex B of PPG6 (paragraph 6). However, Annex B also states that plans should set out clear guidelines, to apply in development control decisions and I consider that the council’s reliance on Policy RT01 is unsatisfactory. A specific policy on secondary retail frontages would provide greater certainty and clarity for users of the plan. Related to this is the need for the council to define town centres and I draw attention to my recommendations on Policy RT01, which relate to this matter. I sympathise with objectors concerns about the vulnerability of Chipping Sodbury to the loss of retail units and I consider that PC156 and PC157, put forward by the council, do not go far enough. A specific policy for secondary frontages is necessary, and the council should clearly set out the changes from A1 use that would be acceptable in secondary frontages. This would help to address local objectors concerns and the objections from the government office.

12.7 Government policy in PPG6 encourages diversification of uses in town centres, although the PPG also makes it clear that retailing should underpin such centres (paragraph 2.18). Paragraph 9.93 of the plan recognises this, making it clear that service uses should not be allowed to dominate primary shopping areas in a way that undermines their retail function. It is therefore appropriate to define primary frontages and it is proper that Policy RT09 and the supporting text should have a restrictive tone regarding change within them. I am satisfied that the Policy and supporting text achieve an appropriate balance between protecting retail character and allowing changes of use where they would make a positive contribution to the
vitality of the centre. The objector’s suggested wording, which is more promotional of diversification and the evening economy is inappropriate and unnecessary. Criterion A should not be deleted.

12.8 The council argues that Policy RT09 has been drafted so that the applicant should provide information in support of their application which the local planning authority will consider in assessing whether the proposal is acceptable or not. In this way it is for the authority to demonstrate why a proposal is or is not acceptable taking account of all material considerations. This approach is reasonable, since the purpose of the policy is to prevent the loss of A1 retail uses in the primary shopping frontages in order to sustain the vitality and viability of town and district centres. The viability of an existing business can be a material consideration to be taken into account and I find no reason to redraft it as requested.

Recommendation

12.9 I recommend that the local plan be modified

i) by the addition of a new Policy to specifically deal with secondary retail frontages, clearly setting out the changes from A1 use that would be acceptable.

ii) in accordance with PC156 and PC157 subject to their updating in the light of the above recommendation.

13. Policy RT10 – Retention of local shops, parades, village shops and public houses

Objection

| 283/103 | Government Office for the South West | RT10 |

Support

| 198/018 | Marshfield Parish Council | RT10 |
| 431/091 | Friends of the Earth | RT10 |

Issue

Should criterion D in the first paragraph of the Policy and criterion B in the second paragraph be deleted?

Reasoning and conclusions

13.1 The council argues that Policy RT10 has been drafted so that the applicant should provide information in support of their application which the local planning authority will consider in assessing whether the proposal is acceptable or not. In this way it is for the authority to demonstrate why a proposal is or is not acceptable taking account of all material considerations. This approach is reasonable, since the purpose of the policy is to prevent the loss of local shops and other local services which are of community benefit. The viability of an existing business can be a material consideration to be taken into account and the criteria accord with government advice in paragraph 7 of PPS7, which states that “Planning authorities should support the retention of these local facilities and should set out in LDDs the criteria they will apply in considering planning applications that will result in the loss of important village services (e.g. as a result of conversion to residential use).” I find no reason to delete criteria D and B as requested.
13.2 The council has put forward some minor additional changes to the supporting text (PC150, PC151 and PC152). These appear to be reasonable and the plan should be modified accordingly.

Recommendation

13.3 I recommend that the local plan be modified in accordance with PC150, PC151 and PC152.

14. Policy RT11 – Use of upper floors in town/district, local and village centres

Objections

| 266/007 | MEPC Ltd & The Charterhouse Shopping Centre Fund 2 | RT11 |
| 266/008 | MEPC Ltd & The Charterhouse Shopping Centre Fund 2 | RT11 9.110-9.114 |

Support

| 198/019 | Marshfield Parish Council | RT11 |
| 203/013 | Frampton Cotterell Parish Council | RT11 |
| 431/092 | Friends of the Earth | RT11 |

Issue
Should Policy RT11 and the supporting text be more accommodating to a range of appropriate uses taking full account of local circumstances?

Reasoning and conclusions

14.1 The council accepts that a range of uses may be acceptable at first floor level above shops and the Policy and text as drafted give sufficient flexibility to accommodate an appropriate range of alternative uses, where it can be demonstrated that housing cannot reasonably be provided. The aim of the policy, to identify residential use as the first choice for new and existing premises above ground floor level in town, district, local and village centres is reasonable, given the valuable role that housing plays in making efficient use of land, supporting local vitality, and improving local security. The positive role of mixed use developments and housing is identified in paragraphs 2.13 to 2.17 of PPG6. I find no reason to adopt the wording suggested by the Objector in document 266A. I also draw attention here to my conclusions and recommendations in respect of the related objection to criterion E of Policy RT1.

Recommendation

14.2 I recommend that no modification be made to the local plan.

15. Omission Site - Kingswood - Land at Wood Road/Douglas Road

Objection

| 343/009 | Hallam Land Management Ltd | Omission Site |
Issue
Should the safeguarding of the land for employment development/redevelopment be deleted and the allocation amended to recognise the site's potential for residential/retail development?

Reasoning and conclusions

15.1 The council states that this site has been considered for a wide range of uses in preparation for the local plan and it is considered to be too remote from Kingswood town centre to be considered as a town centre or edge of centre site. Furthermore, the council does not wish to promote additional retail development when there is scope for further development and redevelopment within and adjacent to the town centre to meet projected needs. I consider this area in more detail in chapter 8 of my report. In the absence of any specific or compelling evidence from the objection, I find no justification to amend the allocation as requested.

Recommendation

15.2 I recommend that no modification be made to the local plan.
CHAPTER 10 - LEISURE, RECREATION, EDUCATION AND COMMUNITY FACILITIES

1. General

Objections

188/008  Nigel Cant Planning  General 10
351/004  Seven owners of Land near Severn Beach  General 10

Support

386/001  Sport England  General 10

Issues

Should a policy be included which allocates a site for a new motor cycle training centre?
Should specific provision be made for community and leisure facilities and shops in the Pilning and Severn Beach area?

Reasoning and Conclusions

1.1 An existing and highly successful motor cycle training centre at Hambrook will soon have to relocate. It is suggested that a new site will have to be found in a rural area, principally on cost grounds. A suggested possible location is Pucklechurch in the Green Belt, notwithstanding that an appeal relating to such a proposal was dismissed by the Secretary of State in July 2001. This would be well-situated for residents of Bristol and Bath, as well as for those coming from much further afield, given its accessibility to the strategic road network. However, the objection is not site-specific but rather asks that the Council allocate a site within the local plan.

1.2 I have no doubt that the many reasons put forward by the objector as to the value of proper facilities for motor cycle training are well-founded. However, I can see no justification for recommending that the Council should undertake the considerable work involved in identifying a site which would meet all the commercial and planning requirements. The local plan includes criteria-based policies against which a proposal brought forward by a developer or operator of a suitable facility can be assessed and there is therefore no need for a specific policy in this chapter.

1.3 Pilning and Severn Beach are fairly small communities, each of which is typical of the sort of settlement which can most cost-effectively be served with a mobile, rather than a permanent library. Given the rural and coastal character of the area, I consider that the informal facilities available for recreation are adequate for the local population. Should that population increase as the result of future windfall development, the local plan includes policies which allow for any justified provision or expansion of community facilities. The local plan also includes policies to allow for retail development proposals that may be brought forward. There is therefore no identified need for additional policies which are specific to Pilning and Severn Beach in this plan.

Recommendation

1.4 I recommend that no modification be made to the local plan.
2. Paragraphs 10.1-10.10 - General

Objections

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Issues

Should reference to Avon Health Authority be amended to reflect organisational changes?

Should Chapter 10 include a reference to the "Vision for the North Fringe", and particularly its identification of a desire for a greater cultural focus at Cribbs Causeway?

Should the plan distinguish between the planning of sports facilities for existing needs and the needs of new development?

Reasoning and Conclusions

2.1 As the Avon Health Authority has been disbanded, references to its functions in primary care should reflect the transfer of those responsibilities to the South Gloucestershire Primary Care Trust, in accordance with PC93.

2.2 The council produced a "Vision for the North Fringe" in April 2002 to give an overview of the community's long-term aspirations for the North Fringe. Its sub-title is "2010 and beyond". The vision is in part that local town centre improvements could be complemented by changes at Cribbs Causeway to provide a focus point for local centres and the broader region, including meeting the need for affordable recreational and cultural opportunities identified by young people. An important element of the vision is an extension of the LRT to Cribbs Causeway. The council refers to the requirement in draft PPS6 that such consultation results should be inputs to the future regional spatial strategy. Pending finalisation of PPS6, it is at least reasonable to conclude that, if these aspirations of the "Vision" document are to be met, a change in policy would be needed at the strategic level, where at present JRSP policy 43 specifically directs such provision to the urban areas. That such a change would lie beyond the period of the plan is broadly reflected in the subtitle of the "Vision".

2.3 Paragraph 10.5 sets the general strategic context for the objectives of chapter 10 as properly including the JRSP, PPGs, RPG10, Sport England guidance and public consultation carried out "to date". Although the "Vision" could be seen as being included in the last category, there is no evidence that it has actually influenced the objectives of the chapter, or informed any of its policies. This is as it should be because, were it to have done so, the outcome would be a conflict between the plan and its current strategic context, particularly the JRSP. I conclude that specific reference to the "Vision for the North Fringe" is unnecessary, could be misleading and should not be included.

2.4 Objectors have conditionally withdrawn their objection to paragraph 10.6 on the basis that will be amended in accordance with PC92. This would confirm that proposed new development would neither be held up by delays in the completion of a broader review of sports strategy nor required to make contributions to sports, recreation and community facilities unrelated in scale to the new development itself. The change would remove an area of doubt about the rate of build-out on individual sites and conform with the guidance of Circular 1/97.
Recommendation

2.5 I recommend that the local plan be modified

i) by the deletion of the last two sentences of paragraph 10.5, and

ii) in accordance with PC92 and PC93.

3. Policy LC01 and Paragraphs 10.11 - 10.13 – Provision for built sports, leisure and community facilities (site allocations and developer contributions)

Objections

4/002 Mr Petros Birakos
7/002 Mr P J Charlton
132/007 St Michaels Parish Church
132/010 St Michaels Parish Church
180/061 Joint Parishes Consultative Committee
254/061 Sodbury Town Council
266/016 MEPC Ltd & The Charterhouse Shopping Centre Fund 2
266/017 MEPC Ltd and The Charterhouse Shopping Centre Fund 2
285/012 Crest Nicholson Residential (South West) Ltd
299/064 Westerleigh Parish Council
300/063 Dodington Parish Council
387/001 Tracey Park Golf & Country Club
398/003 East Lake Developments Ltd
405/002 Mrs Ratcliffe, Messrs Baker, King & Smith
444/001 Eastlake Developments Ltd
454/003 Mr & Mrs Larner
457/001 Woodlands Golf & Country Club

Support

386/002 Sport England
403/028 Hartwell Plc

Issues

Should the plan identify specific sites in the Green Belt for development to provide and support leisure facilities?

Does the allocation of a site for a community facility at Wellington Road, Yate take sufficient account of its probable impact on the visual amenities of nearby residents?

Should the plan make any other allocations for additional new or replacement community, leisure and recreation facilities, including places of worship?

Should the plan further clarify the basis on which conditions and obligations will be justified, with regard to the relevant legislation?

Should the plan’s provisions for improved facilities be restricted to those related to new development?

Reasoning and Conclusions

3.1 Objectors have proposed that a number of sites in the Green Belt should be either allocated or at least positively supported by the plan. I have concluded elsewhere that there should be no change to the green belt designation covering any of these sites. In accordance with PPG2, the Green Belt policies ensure that any planning applications for
inappropriate development would not be in accord with the plan. The level of detail provided of the proposed development varies from site to site, but in each case there is at the very least a substantial risk that a detailed proposal may inevitably conflict with Green Belt policies. Therefore, for this chapter to include positive support for any of these developments would bring the plan into conflict with itself if, at a later stage, it turned out that the development could be implemented only in a form inappropriate in the Green Belt. In any case, policy LC5 sets the criteria for any sport and recreation development which is suitable in principle to its location in the countryside and I do not believe that any site specific policy is either necessary or desirable.

3.2 The proposed provision of a site at Wellington Road, Yate reflects an existing long-standing reservation arising from the identified needs of residential development in the area. Policies elsewhere in the plan, and especially policy D1, will ensure that the objector’s concerns are properly addressed during the development control process once a planning application comes forward.

3.3 The population of the area including Stoke Gifford and Stoke Park has increased dramatically in recent years. Nevertheless, no substantive evidence has been provided either that worship and community facilities now in place are under pressure as a result, or that a specific site is necessary and has been identified for the purpose. Without such evidence, I am unable to recommend that an allocation should be made in the plan. That is not to rule out proposals which may come forward to meet any as-yet unidentified need from existing development, since these could be dealt with adequately under other policies in the plan. I am satisfied that Policy LC1 provides the means for meeting needs arising from future residential development.

3.4 Paragraph 10.11(6) leaves some ambiguity over the location of the improved community facilities in Yate Town Centre and does not fully reflect PCs 154 and 155, relating to paragraphs 9.27, 9.27A and 9.41 which I am recommending should be adopted. This shortcoming is resolved by PC 137 and I shall further recommend accordingly.

3.5 Yate Football Club already has satisfactory facilities and, as far as the evidence shows, it would only need to relocate if the present site were to be developed. I have recommended elsewhere that no changes in the plan should be made to allow development of the site and there is therefore no need to include an allocation for a new football field.

3.6 On the fourth issue, policy LC1 itself and paragraph 10.13 are unambiguous that, if existing facilities are inadequate to meet the need generated by new development, the Council will secure provision in scale with the development from the developers through one means or another. In referring to adequacy to meet the need generated by the development, they effectively meet the requirements of paragraph B9 of Circular 1/97 and paragraph 14 of Circular 11/95. Paragraph 10.13 sets down how any need for essential facilities arising from the development will be specifically identified and met. It refers twice to the intention to follow the guidance in Circular 1/97. I see no need for further clarification in this case.

3.7 As to the last issue, I can see no reason why the plan should not seek to improve facilities for all potential users.

3.8 I consider that other objections have been dealt with by the alterations included in the revised deposit draft plan.

Recommendation

3.9 I recommend that the local plan be modified in accordance with PC 137.
4. Policy LC01 - Paragraph 10.13A – Facilities at Northfield, Emersons Green and additional sites

Objection

386/504  Sport England  LC01 10.13A

Issue

Should the plan be specific about how facilities at Northfield and Emersons Green East will be provided?

Reasoning and Conclusions

4.1 Policy LC1 itself provides the framework by which needs arising from new residential development will be met. This is further clarified at paragraph 10.13. The first sentence of PC94 repeats this. However, considering the size of the two developments concerned, I agree that PC94 should reiterate this point. It also gives useful guidance on the need to ensure that the rates of provision and development will proceed in phase.

Recommendation

4.2 I recommend that the plan be modified in accordance with PC94.

5. Policy LC02 – Provision for education facilities (site allocations and developer contributions)

Objections

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Issues

Does the allocation of a site for a school at Wellington Road, Yate take sufficient account of its probable impact on the visual amenities of nearby residents?

Should the policy include additional sites for new schools at Harry Stoke and Old Sodbury?

Is there an alternative, more suitable site than that allocated in the plan for a primary school in Cromhall?

Should the allocations for new schools in the Green Belt at Marshfield and at Redwick & Northwick be deleted?

Should the plan further clarify the basis on which conditions and obligations will be justified, with regard to the relevant legislation and practice?
Reasoning and Conclusions

5.1 The proposed provision of a site at Wellington Road, Yate reflects an existing long-standing reservation arising from the identified needs of residential development in the area. Policies elsewhere in the plan, and especially policy D1, will ensure that the objector's concerns are properly addressed during the development control process when a planning application comes forward.

5.2 The council's appraisal of the need for primary schools in the area which includes Harry Stoke has led it to propose an extension of the existing St Michael's Primary School in Stoke Gifford and a new primary school at Parkway North. These seem to me sensible locations in relation to the large concentration of housing development north of the railway line. Young children living in the more limited residential area of Harry Stoke have to negotiate the Hatchet Road bridge under the line, but this route is clearly well-established and no difficulties have been identified which, by themselves, are so great as to justify a further school south of the line. The plan allows for the needs of children at Stoke Park together with the allocated sites at Wallscourt Farm and east of Coldharbour Lane being met by a new school to be included in the detailed planning of the latter two sites. However, the residential development of the Harry Stoke safeguarded site, which I have recommended should be included in the plan, would certainly require the provision of a new primary school. I agree with the objectors that this should be located within the site itself. The policy covers such a provision and, as with the need for new schools at other major developments, no specific reference is required. However, a reference to Harry Stoke within paragraph 10.15 would bring it in line with the plan's approach to the other sites in the area and I recommend accordingly. The need for a primary school on the Harry Stoke site will need to be included within the supporting text to the proposed housing site in chapter 8 of the plan.

5.3 The Education Authority is examining the possibility of replacing Old Sodbury School but has not yet finalised its strategy for primary education in the area, nor has any site been identified. The objector is proposing a site within the Green Belt where most development, including that being proposed, would conflict with policy to protect the Green Belt. I have no reason to disagree with the council that other, non-Green Belt sites may well be found to be suitable once the education strategy for the area is defined. Therefore, while I note the objector's concerns about the shortcomings of the present school buildings and site, I recommend no change to the plan.

5.4 At Cromhall, the allocated site for a new primary school adjoins the existing chapel and its car park. It appears to me highly likely that the access to the proposed school would be directly from the highway at the south-west corner of the site, an area presently occupied in part by a temporary building serving as a community shop and post office. I consider it highly unlikely that the detailed design for the school would prejudice any current or future interests of the owners of the chapel. An alternative site has been proposed for the school, south of Longcross Farm. As I do not recommend that land adjoining the alternative site should be allocated for housing, I consider that its development as a school would be more prominent and thus have an undesirably greater impact in landscape terms than that of the allocated site.

5.5 The proposed primary school at Marshfield has planning permission and has been deleted from the revised deposit draft.
5.6 There is now some doubt as to whether the site at Northwick will be needed. This will only be resolved once options for school provision in the area have been defined and the results of the subsequent public consultations have been considered. In the mean time, the council wishes to retain the allocation and says that any school within the settlements to be served would be within the Green Belt. Even were the present proposal more definite, its position in relation to PPG2 is quite clear. A school building would be inappropriate development unless it were in the form of limited infilling in an existing village listed in the development plan as being "washed over" by the Green Belt. Policy GB1 is consistent with PPG2 in this respect. Unlike Redwick (which I presume is included as "part of Pilning" in paragraph 5.11), Northwick does not have a settlement boundary defined on the proposals map, neither is it listed in paragraph 5.11 as a "washed over" settlement. A new school building in Northwick would therefore be inappropriate development in the Green Belt and would also be contrary to policy GB1. The allocation in policy LC2 is thus insupportable as it not only brings inconsistency into the plan, but also flies in the face of the guidance in paragraph 3.3 of PPG2.

5.7 As with the equivalent issues in relation to policy LC1, I consider that Policy LC2 itself and paragraph 10.16 are unambiguous that, if existing facilities are inadequate to meet the need generated by new development, the Council will secure provision in scale with the development from the developers through one means or another. Similarly, they effectively meet the requirements of paragraph B9 of Circular 1/97 and paragraph 14 of Circular 11/95. Paragraphs 10.13, 10.17 and 10.18 set down in principle how any need arising from development will be specifically identified and met. Paragraph 10.13 refers specifically to the intention to follow the guidance in Circular 1/97 and I see no need for further clarification in this respect. However, the Council has pointed out that part of paragraphs 10.14 and 10.18 do not reflect changes in the Council's practice and Government advice and requirements that have been introduced since the publication of the revised deposit draft, making necessary the changes set out in PC192 and PC193. The Council has further proposed, PC219, which I agree is a more precise and necessary qualification than "where appropriate" in the first paragraph of the policy.

5.8 The Sports Strategy at paragraph 10.6 includes the use of both purpose-built community facilities and the community use of school facilities. In both cases, it is implicit that general community use will extend into the leisure hours of the population at large. I do not consider that the plan should be modified to emphasise the point in relation to any particular site, since to do so may diminish rather than improve the clarity of the plan's intentions.

5.9 As to last issue, I can see no reason why the plan should not seek to improve educational facilities where necessary for the occupiers of existing development.

Recommendation

5.10 I recommend that the local plan be modified

i) in accordance with PC192, PC193 and PC219,

ii) by the deletion of allocation 9 (Northwick) from policy LC2, and the whole section headed "Redwick & Northwick" from paragraph 10.15, and

iii) by the addition to paragraph 10.15, under "Stoke Gifford" and after "... development of these two sites", of the following sentence: "Similarly, the allocation of land at Harry Stoke generates a requirement for a new primary school, whose location will be determined in conjunction with refining proposals for that site."
6. Policy LC04 – Proposals for education and community facilities within existing urban areas and defined settlement boundaries

Support

198/022 Marshfield Parish Council LC04

Reasoning and Conclusions

6.1 In my reasoning and conclusions on the first issue relating to paragraph 11.22 (Service infrastructure – Fire, objection no. 28/002, Avon Fire Authority) I find that policy LC4 is sufficient to meet the concerns expressed, but that its relevance would be clearer if paragraph 10.21 were altered to make specific reference to fire stations.

Recommendation

6.2 I recommend that the local plan be modified by amending the second sentence of paragraph 10.21 to read: "It is considered that the policy will apply to a range of community facilities including schools, nursery provision, GP and dental surgeries, fire stations etc"

7. Policy LC05 and Paragraph 10.25 – Proposals for outdoor sports and recreation outside existing urban areas and defined settlement boundaries

Objections

250/001 Bristol Golf Club Ltd LC05 10.25
251/001 Mr K Sherrell LC05 10.25
457/002 Woodlands Golf & Country Club LC05

Support

288/020 Department for Environment, Food & Rural Affairs LC05

Issues

Should the plan lay more emphasis on the need for leisure and sport facilities in sustainable locations?
Should the plan include a specific policy for the expansion of existing leisure sites with additional facilities?
Should the plan identify sites for the expansion of existing facilities?

Reasoning and Conclusions

7.1 Policies LC3 and LC5, supported by paragraphs 10.9, 10.19, 10.24 and 10.25, already put adequate weight on accessibility by sustainable transport modes as a criterion for new or additional leisure facilities. No further emphasis is required.

7.2 Paragraph 10.25 serves to support the policy and contains no matters that need to be dealt with under a new, separate policy. However, Policy LC5, unlike policy LC3, does not specifically include the expansion or improvement of existing facilities as well as the development of new ones. Such proposals are given only passing mention in the supporting paragraphs. The council has said in response to the objection that the policy does allow for the expansion of existing sites, but this seems to me far from clear. If this is the council's
intention, the policy should say so. Otherwise, I believe there is an unacceptable possibility that the difference in wording between LC3 and LC5 could be used in the development control process to support decisions contrary to that intention.

7.3 This policy sets the criteria to be met by proposals which may come forward. Site specific allocations are provided in policy LC1, where I have dealt with the objectors' representations about the omission of the Woodland Golf and Country Club as a site in the Green Belt for further leisure development. No issue as to the criteria of policy LC5 has been detailed by the objectors. The omission of any reference to the site in policy LC5 would not preclude their making a planning application for any future proposals at the site, to be considered in the same way as their previous applications. There is no need to modify the plan on this account.

Recommendation

7.4 I recommend that the local plan be modified by inserting after the words "Proposals for" in the first paragraph of policy LC5: "the development, expansion or improvement of"

8. Policy LC06 – Major sports stadia

Objections

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Issues

Does the plan take sufficient account of the impact of the use of a major stadium on the highway network?

Should the plan include a site allocation for a major sports stadium?

Reasoning and Conclusions

8.1 Consequent on changes to the plan in the revised deposit draft, the Highways Agency has withdrawn its objection on the condition that the plan will make no site specific proposal.

8.2 The only specific, adequately detailed proposal with landowner commitment to emerge, after a considerable period of searching for a site, has been withdrawn and no further such detailed proposal has subsequently come forward. In terms of paragraph 6.24 of PPG12, I believe it is unlikely that any specific provision could now be identified, evaluated, and implemented during the period of the plan. The July 2002 edition of PPG17 replaced the 1991 version and the previous guidance of paragraph 50, requiring sites to be identified in development plans, was not carried forward. The only specific guidance on stadia in the 2002 edition (paragraph 22) is reflected in criterion B of the revised deposit draft version of
the policy. I therefore conclude that the present policy is the more realistic means for the Council to indicate what it will seek from possible future developers.

8.3 In the light of the objectors' concerns, it is helpful that the council has formally resolved to "take a positive approach to identifying an appropriate site, through the emerging sub-regional partnership" and it may wish to consider whether the utility of the plan would be enhanced by referring to this decision in the supporting text, possibly at the beginning of paragraph 10.30.

**Recommendation**

8.4 I recommend that no modification be made to the local plan.

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9. **Policy LC07 – Allocated sites for formal and informal open space**

**Objections**

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**Issues**

- Should the plan allocate only part of the existing playing fields at New Road, Filton for retention as such, with the remainder identified for new development?
- Should the allocations in the policy be amended to take account of the limited usefulness of some established open space?
- Should the plan include an additional allocation south of the Mundy Playing Fields, Thornbury?

**Reasoning and Conclusions**

9.1 I consider the first issue under item 29 of chapter 8a.

9.2 Objectors have not argued that any allocated site should be removed from the policy, neither have they suggested any further sites that should be included. Three of the objectors have withdrawn their objection conditionally upon the insertion of further explanatory text under policy LC8 under PC191. This indicates that the second issue relates to the extent to which areas of mainly aesthetic and very limited recreational value should be taken into account when determining open space requirements for new development. I agree that to include such areas in the assessment of recreational needs would lead to an under-provision of recreational spaces. I recommend modification in accordance with the proposed change providing for additional supporting text to policy LC8, rather than a modification to policy LC7.

9.3 The objection on the third issue arises from the deletion of an area which was included in the consultation draft plan. Although the site is viewed by the Town Council as a valuable community asset, no substantive justification for its inclusion in the plan has been put
forward. There are also no detailed proposals as to how it should be developed or its purchase funded. I therefore find there is insufficient justification for its inclusion as a site under this policy.

Recommendation

9.4 I recommend that no modification be made to the local plan.

10. Policy LC08 and Paragraphs 10.34 and 10.36 – Open space and children’s play in conjunction with new residential development

Objections

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Issues

Is the standard for the provision of informal open space by new residential development necessary?

Should the plan take account of the usability of different playing surfaces in setting standards for the provision of pitches and courts?

Reasoning and Conclusions

10.1 The level set by the plan for the provision of outdoor playing space is 2.4ha per 1000 population, and there is no dispute that both this overall level and the breakdown given at paragraph 10.34 reflect well-established national guidance (the "Six Acre Standard"). The issue is whether there should be any additional allowance, and specifically a set standard of 0.5ha per 1000 population, of informal open space aside from areas secured for children's play. The purposes of this additional area would be to improve the quality of the residential environment and to provide for walking, cycling, visual interest and wildlife (and presumably just general relaxation). I set this down as my understanding of the council's intentions as expressed in the supporting paragraphs, since the policy does not seem to me to be completely clear in itself as to what the 0.5ha refers to.

10.2 There is no doubt in my mind that residential development, especially on a medium or large scale, benefits from such areas of informal open space. Private gardens usually do much for the visual amenity of the area, but only limited control can be exercised over them and they are not, of course, available for other forms of enjoyment by the general public. It may be the case that, especially on former agricultural land, informal public areas can be based around pre-existing or specially-created rural features such as streams, hedgerows or
small copses, perhaps forming a green network of places and links. There may also be justification for identifying potential sites for allotments, as recommended in the Companion Guide to PPG17. This is a matter I deal with under policy LC11. At the other end of the spectrum, town centre development may be better served by more formal areas of predominantly hard landscaping. I therefore recognise that the actual area needed by each development may vary according to its general location, the character of the locality being created, the type of housing provided and its proximity to other open, publicly-accessible spaces, including adjacent countryside served by footpath and bridleway networks.

10.3 The council has established that problems arise from the setting of a blanket standard for all open space that does not recognise the value placed by the public on informal areas. The plan includes, in Chapter 3, design criteria which stress the importance of landscaping and the qualities of all external areas of the site. This reflects Government guidance, including PPG3 which I note includes such spaces in the area used to calculate net site density. There is therefore no reason why their inclusion should prejudice the ability of the development to meet the Government's density guidelines. I agree that the status of such open spaces should be acknowledged as standing alongside but not being included in the 2.4ha provided for the uses defined in paragraph 10.34. Policy LC8 as it stands does not exclude innovative solutions. However, in the light of the likely wide variation in need, I consider it is over-prescriptive as to quantity. As a result, the successive negotiations with developers to explore flexibility, as envisaged by the council, may well lead to the standard's being honoured more in the breach than in the observance. This would in turn undermine the integrity of the policy as a whole. What is more, this would still be likely to happen if the standard, once included, were merely re-valued as a result of the council's ultimate completion of the assessment envisaged by PPG17. I therefore recommend revisions to the policy and supporting paragraphs to balance these concerns and to include recognition of allotments as a potential need to be considered.

10.4 The level of provision of formal sports areas presumably allows for an average level of usability. I agree with the objectors and the council that the higher usability of all-weather pitches should be reflected in the total area to be provided, but account should also be taken of the other benefits which open spaces give to the community. Three of the objections have conditionally withdrawn on the basis of the proposed change to the supporting text (PC191). I agree this is the best way of encouraging flexibility without undermining the underlying purposes of the policy. The proposed change also includes the matters dealt with as the second issue under policy LC7.

10.5 Proposed change PC95 will provide a more secure means of assuring the maintenance of open spaces and outdoor facilities in perpetuity.

**Recommendation**

10.6 I recommend that the local plan be modified

i) by amending policy LC8 to read: "Where local provision for formal open space & children's playspace and for informal open space is inadequate to meet the projected needs arising from the future occupiers of proposals for new residential development, the council will negotiate with developers to secure provision to meet these needs, together with provision for subsequent maintenance. This may include provision on site by the developer and/or contributions to provision or enhancements of existing easily accessible provision within the vicinity. Formal open space & children's playspace together will be to a standard of 2.4ha per 1000 population. Informal open space will be at a level compatible with both the design requirements of the site and the assessed informal recreational needs of future occupiers."
ii) by adding to the end of paragraph 10.35: "Informal open space may also provide a resource to meet justified demands for additional allotment provision foreseen by paragraph A14 of the Companion Guide to PPG17 (2002)."

iii) by deleting the first two sentences of paragraph 10.36 and substituting: "The Council will assess the need for informal open space on the basis of its general location, the character of the locality being created, the type of housing provided and its proximity to other open, publicly-accessible spaces."

iv) by deleting the last two sentences of paragraph 10.36 and substituting: "In all instances the informal open spaces to be provided will be in addition to the requirements arising from other objectives of the plan e.g. attenuation ponds, retention of nature conservation sites, and

v) in accordance with PC95 and PC191.

11. Policy LC09 – Protection of open space and playing fields

Objections

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Issues

- Does the plan provide adequate protection for smaller, informal open meeting places for young people?
- Is the plan unduly restrictive in its protection of open spaces?

Reasoning and Conclusions

11.1 The policy seeks to protect both formal and informal open spaces where they continue to meet a need. The supporting text expands this general requirement by highlighting particular functions. However, no mention is made of the value of open places that are used for informal meeting areas for older children and youths. Several objections have been conditionally withdrawn on the basis of a proposed change (PC138) that corrects this omission, and the council believes this will satisfy the other objectors who raise the same issue. I recommend that paragraph 10.43 be amended accordingly. Other issues raised by these objectors in connection with this policy have been dealt with elsewhere.

11.2 The policy reflects PPG17 in the criteria to be met before development is permitted on an existing open space or playing field. The policy defines a number of circumstances in which development will be acceptable. The council is committed to auditing and reviewing its open space strategy and the results will inform the application of the criteria of the policy. In the meantime, an individual developer could still undertake an assessment of an
open space to support a proposal to be placed before the council for determination. Any lesser regime of protection would fail to accord with Government guidance in PPG17 and its Companion Guide. I conclude that the policy is not unduly restrictive.

Recommendation

11.3 I recommend that the local plan be modified in accordance with PC138.

12. Policy LC10 – Quiet enjoyment of the countryside

Objection

52/009 The Tortworth Estate Company LC10

The objection has been withdrawn on the condition that agreed alterations should be made to the plan. These alterations have been included in the revised deposit draft plan.

13. Policy LC11 - Allotments

Objections

20/001 Mr D Fullman LC11
205/001 Olveston Parish Allotment & Gardeners Association LC11

Support

198/025 Marshfield Parish Council LC11

Issues

Should the plan include allocations for the provision of new allotment sites?
Should the plan take a more positive position to resist the loss of existing allotments to built development?

Reasoning and Conclusions

13.1 The value of allotments has been recognised over many years, both in terms of their basic utilitarian functions and in the openness they may provide to an otherwise densely built-up area. At the least this history encompasses the imposition in 1908 of a statutory duty on a council to provide a sufficient number of allotments, where a demand is identified, and the encouragement of sustainable horticulture by Local Agenda 21. The Companion Guide to PPG17 (at paragraph A14) recognises the likely increase in the need for allotments and recommends a demand-led methodology to respond to that increase. The council is committed to auditing and reviewing its open space strategy in line with PPG17 and the Companion Guide. It is anticipated that this will lead to the publication of Supplementary Planning Guidance (SPG) on open space, sport and recreation. Provided the requirements of PPS12 are met in its preparation, the SPG may be given substantial weight in decisions on future planning applications.

13.2 In the meantime, the objectors identify large areas of development virtually bereft of allotment provision, the apparent lack of such provision on the major housing sites in the plan and the possibility that these factors hide a present or future latent demand. However, the council’s consultations have not resulted in any evidence of such a demand at any
particular locality, finding rather that allotment land is tending to fall into disuse with such waiting lists as there are being satisfied by normal turnover. Without supporting substantive evidence, the inclusion of allocations in the plan would conflict with PPG12 and any provision by the council would run contrary to the statute governing the provision of allotments.

13.3 I am mindful that, to be attractive and sustainable, allotments need to be close to where people live. It is therefore reasonable for the plan to recognise allotments as a possible future use of the open spaces to be provided within or close to areas of residential development. This can best be dealt with, by reference to paragraph A14 of the Companion Guide to PPG17, in a modification to the supporting text of policy LC8, where my recommendation in response to this issue lies, (See paragraph 10.6(ii) above). That recommendation reflects the Council’s view, expressed in its written evidence and at the hearing session, that the larger areas of informal open space within housing sites could suitably accommodate allotments.

13.4 I consider that the policy and its supporting paragraphs embody a strong presumption against the loss of allotments to built development. They set a realistic framework within which proposals for changes in use can be assessed with consistency to ensure they do not prejudice any existing or likely future need. No realistic means of providing stronger protection in the plan has been put forward and I can see none. A policy setting a complete ban would bring uncertainty by causing all decisions on possible future applications to be made with ad hoc reference to material considerations.

**Recommendation**

13.5 I recommend that no modification be made to the local plan.

### 14. Policy LC12 and Paragraph 10.55 – Recreational routes

**Objections**

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**Issues**

Does the plan provide adequate protection for public footpaths?

Should the plan support the protection and enhancement of canals and navigable rivers as recreational routes?
Should the plan require, rather than seek, contributions from developers towards the enhancement of routes?

Does the plan allow sufficient flexibility for the amendment of proposed recreational routes in major development areas?

Is there uncertainty in the plan about the relationship between different route designations which will lead to a lack of safeguarding?

**Reasoning and Conclusions**

14.1 The policy is to protect existing footpaths against the unacceptable effects of or loss to new development, while recognising that development proposals may bring opportunities for the improvement of some routes or the creation of new footpaths. I am satisfied that the plan does provide adequate protection so far as its remit should properly extend. Concerns about obstructions, ploughing and poor maintenance are matters for the highway authority rather than the planning authority functions of the council and are not therefore issues for the local plan.

14.2 Although this policy is titled "Recreational routes" it refers exclusively to walking, cycling and horseriding routes. Permissive policies for the development and improvement of water-based recreational facilities are included in the plan at LC3 and LC5. I understand that navigable waterways have a different historical and statutory background from other facilities. However, no amendments providing site-specific allocations, such as for additional moorings, have been put forward. I am therefore not able to recommend any modifications to the plan in this respect.

14.3 Policies of the plan requiring developer contributions must accord with the guidance of Circular 1/97. Such contributions can only be justified where the need is directly related to the development and they are necessary if the development is to proceed. The policy cannot therefore presume that the circumstances which would justify a refusal of planning permission in the absence of a contribution will be met in every case. I conclude that the word "sought" in the fourth sentence of the policy correctly expresses the basis on which the council may negotiate to obtain contributions generally.

14.4 The policy itself recognises and allows for the potential need to divert existing routes. Where proposed routes are shown on the Proposals Map, the necessary flexibility to allow detailed planning of the site was introduced by way of an addition to paragraph 10.58 in the revised deposit draft. I do not find that any further modifications in respect of the fourth issue are needed.

14.5 The relevant policies for utility and recreational routes, T5 and LC12, are virtually identical in their wording and thus in the safeguarding they provide. A dual designation is necessary to provide continuity where two types of route merge, but I do not consider that this leads to any loss of safeguarding for either. Neither do I see any necessity for the different recreational uses to be separately identified on the Proposals Map. Where such detailed differentiation is needed, it is either intrinsic in the status of existing routes or, for new routes, could be made by an order at a later date.

14.6 Other objections relating to the paths alongside the River Avon and through a tunnel at Staple Hill will be satisfied if amendments included in the revised deposit draft are adopted.

14.7 I agree with the council that the words "where appropriate" in the third paragraph of the policy are unnecessary and should be deleted in accordance with PC220.
Recommendation

14.8 I recommend that the local plan be modified in accordance with PC220.

15. Policy LC13 and Paragraph 10.61 – Public art

Objections

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<td>285/015</td>
<td>Crest Nicholson Residential (South West) Ltd</td>
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<tr>
<td>405/003</td>
<td>Mrs Ratcliffe, Messrs Baker, King &amp; Smith</td>
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<td>University of the West of England</td>
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<td>266/019</td>
<td>MEPC Ltd &amp; The Charterhouse Shopping Centre Fund 2</td>
<td>LC13 10.61</td>
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Issues

- Should the policy relating to public art be deleted from the plan as not being a planning matter, and is the reference to public art not adding cost realistic?
- Should the plan define "major new development" and make a references to one per cent?
- Should the voluntary nature of the scheme be clarified?
- Should the plan restrict the provision of public art to places within the development itself?

Reasoning and Conclusions

15.1 Government policy expressed in "By Design" (2000) is a recent example of the ongoing national encouragement of the use of public art as part of the planning toolkit for urban design. Public art, like landscaping, is a valid means by which the planning process can enhance the human environment. It should be seen as integral to the development, rather than as a cost without balancing benefits.

15.2 The term "major new development", when applied as here to a voluntary contribution, provides a readily recognisable sense of the general type of development where a contribution may be particularly apposite. Further precision of definition could lead to undesirable restrictions in participation in the scheme. The reference to 1% sets a useful guideline on the amount of voluntary contribution that the council would see as reasonable.

15.3 The amendment inserted in paragraph 10.61 of the revised deposit draft emphasises the voluntary nature of the scheme and I do not find any other amendment is necessary. The insertion of "voluntary" in the policy itself would cause confusion by implying some difference of intent between this and other similar policies, such as LC12.

15.4 I concur that it would be preferable for public art to be within the development itself. If, for the reasons given in paragraph 10.61, that is not feasible, it may be that a location where it would enhance the setting of the development would be a possibility. I do not make any recommendation on this point, but the council may wish to consider whether its underlying purpose in proposing the policy would benefit from clarification along these lines.

Recommendation

15.5 I recommend that no modification be made to the local plan.
CHAPTER 11 - SERVICE INFRASTRUCTURE

1. Chapter 11 - General

Objection

449/021 University of the West of England

Issue

Should the plan include a code of practice governing the design and landscaping of utilities’ service infrastructure?

Reasoning and Conclusions

1.1 The objector accepts that the siting of new infrastructure is normally governed by the location of existing infrastructure, but considers that a specific code of practice for such development would improve the quality of its design and landscaping. The plan addresses both these matters adequately in Policy D1. This policy clearly applies to all new development and I see no reason why further emphasis should be needed to ensure compliance by any specific type of proposal.

Recommendation

1.2 I recommend that no modification be made to the local plan.

2. Policy SO1 – Proposals for health provision

Objections

180/069 Joint Parishes Consultative Committee S01
254/069 Sodbury Town Council S01
283/108 Government Office for the South West S01
299/072 Westerleigh Parish Council S01
300/071 Dodington Parish Council S01
380/010 South Gloucestershire Primary Care Group S01

Issues

Should the local plan include more allocations for general practitioners’ surgeries?

Is site (1) correctly identified in accordance with the agreed details?

Should specific allocations be included in the local plan to meet the need for health facilities arising from proposed housing development?

Should the policy allow for financial contributions towards off-site provision or the enhancement of existing facilities?

Reasoning and Conclusions

2.1 The Council evidently shares the objector's concerns that, in spite of widespread consultations, no proposals for new GPs’ surgeries in Yate and Chipping Sodbury had come forward that were either sufficiently detailed or sufficiently certain of implementation to allow a specific allocation to be made in the local plan. Additional wording was therefore inserted into paragraph 11.9 at the revised deposit draft stage, making reference to land adjacent to the Link Road, Yate as a potentially suitable site. I understand that the underlying concern of the several parish councils is that this reference implies the suitability of the land for a range of other forms of development.
2.2 Paragraph 11.8 recognises the general need for new GPs’ surgeries and clinics which it says can be met through the development control process with specific reference to Policy LC4. I consider that this reference is sufficient to cover circumstances which do not allow a specific allocation to be made. I therefore concur with the agreement reached between the council and the objectors that the reference to the Link Road site is unnecessary, as reflected in PC139.

2.3 The council has confirmed that site (1) is that which has outline planning permission (ref: PT03/1510/R30) for the proposed health centre. The need for the facility in this part of Bradley Stoke is not disputed and, in the absence of any specific, agreed alternative site, I have no reason or basis on which to recommend a modification to this part of the policy.

2.4 The new residential development which will give rise to the local need for additional health facilities will, for the most part, be on the large sites identified in policy H1. For these sites, master plans and detailed development briefs will be finally agreed after the plan is adopted. Part of this process will be ongoing consultation with, amongst others, the health services bodies. The resulting identified need for health facilities is highly likely to be met either by a new provision designated by the master plan within the site itself or through the enhancement of existing, off-site facilities. In these circumstances, I consider that it would be inappropriate for the local plan to make specific allocations in advance of the completion that process.

2.5 The council acknowledges that doctors’ surgeries, and presumably therefore local health facilities generally, are essential community facilities, thus falling within the scope of Circular 1/97. I note that the council is concerned that it is not in a position itself to identify the actual requirements for health facilities arising from new development. However, it seems to me there is little difference in this respect between health facilities and various matters included in policy S1A as things to be the subject of consultation with the relevant providers during the site planning process. Indeed an "appropriate site reservation" under policy S1 as it stands could only be made as a result of such a consultation process. Off-site financial contributions may emerge as the most effective means of meeting the identified need. The council believes the policy as it stands would allow for this. I disagree and consider that such means of provision should be set out clearly as an acceptable option.

2.6 I believe this can best be achieved by including such facilities in those covered by policy S1A, with an appropriate amendment to the text of policy S1, including a cross-reference to policy S1A for clarity.

2.7 I consider that my recommendations in respect of policy S1A cover the Council’s concerns about the difficulty in obtaining proper justification for contributions from windfall development. It will be incumbent on the health service provider to either respond to consultation within the planning application determination period or to accept that, in accordance with Circular 1/97, no financial contribution can be required.

**Recommendation**

2.8 I recommend that the local plan be modified

i) By amending the last sentence of the policy to read: "Where a local need for addition health facilities arises in conjunction with proposals for new residential development, the Council will require adequate provision to be made in accordance with policy S1A.", and

ii) in accordance with PC139.
3. Policy SO1 - Paragraphs 11.9, 11.9A and 11.9B Proposals for health provision

Objections

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<td>Highways Agency</td>
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<td>491/501</td>
<td>Mr A Freke</td>
<td>S01 11.9B</td>
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Issues

Is the final sentence of paragraph 11.9B inappropriate in lending support for an undefined proposal?

Should reference to Avon Health Authority be amended to reflect organisational changes?

Is paragraph 11.9A over-prescriptive in defining the way in which the need for health facilities will be met for the sites?

Reasoning and Conclusions

3.1 Paragraph 11.9B provides information on the longer-terms aims of the North Bristol NHS Trust, which it acknowledges are insufficiently detailed for inclusion in the local plan. However, the final sentence offers positive support for the proposal and I agree with the council’s decision, by way of PC98, that this sentence should be deleted as inappropriate to the local plan.

3.2 As the Avon Health Authority has been disbanded, references to its functions in primary care should reflect the transfer of those responsibilities to the South Gloucestershire Primary Care Trust, as per PC96.

3.3 In respect of the development of land at Northfield and land fronting the A38 at Filton/Patchway, the Council has agreed with the South Gloucestershire Primary Care Trust an amendment to paragraph 11.9A.(PC97) I agree that it is more appropriate at this stage to allow for either a new surgery on site or for financial contributions to be made to enhancing existing off-site facilities. My recommended changes to policies S1A and S1 provide the policy support for this approach for these sites.

Recommendation

3.4 I recommend that the local plan be modified in accordance with PC96, PC97 and PC98.

4. Policy SO2 –Proposals for Social Services

Objection

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Issue

Should specific allocations be included in the local plan to meet the need for social services facilities arising from proposed housing development?
Reasoning and Conclusions

4.1 The new residential development which will give rise to the local need for additional social services facilities will, for the most part, be on the large sites identified in policy H1. For these sites, master plans and detailed development briefs will be finally agreed after the plan is adopted. Part of this process will be ongoing consultation with, amongst others, the social services authority. The Council believes that any resulting identified need for social services facilities will be met by a new provision designated by the master plan within the site itself. In these circumstances, I consider that it would be inappropriate for the local plan to make specific allocations in advance of the completion that process.

Recommendation

4.2 I recommend that no modification be made to the local plan.

5. Policy S03 – Burial facilities

Objections

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<td>300/072</td>
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Issues

- Should the policy refer to crematoria as inappropriate within the Green Belt?
- Should the policy refer to crematoria as not appropriate development within the Cotswolds AONB?
- Should paragraph 11.18 make specific reference to Yate as an area where small scale cemeteries might be provided?

Reasoning and Conclusions

5.1 Policy GB1 follows the guidance in PPG2 in specifying, by their purpose, only those buildings which are not inappropriate in the Green Belt. Since crematoria are not so specified, the reference to them in policy S3 as "not appropriate in the Green Belt" is unnecessary. Further, as "not appropriate" diverges from the two categories in PPG2 of "inappropriate" and "not inappropriate", its inclusion could lead to confusion.

5.2 Criteria for development in the AONB are set out in Policy L3, which does not rule out or rule in any particular type of development. On that basis alone, a proposal for a crematorium in the AONB would be considered in the same way as any other new development. I note that the last sentence of policy E5 includes requirements similar to those of criteria A, C and D of policy S3, but does not go on to rule out, in that case, new employment development in the AONB. The plan identifies no reason, nor can I see any, why crematoria should be treated differently from employment development, and especially from B2 and B8 uses. I agree with the council’s view that no cross-reference to policy L3 is necessary, but I believe it would be correct and consistent to leave crematoria proposals in the AONB to be tested against that policy, rather than ruling them out altogether.

5.3 I understand that the specific concerns of the parish and town councils in the wider Yate area centre on the poor quality and inaccessibility of the cemetery at Mayshill, Yate,
and on the need for additional small scale provision closer to the built up area. I note that Yate & Sodbury Liberal Democrats and Yate Town Council have now conditionally withdrawn their objection on the basis that a specific reference will be given to Yate within paragraph 11.18. The council considers that such a modification (PC140) would also overcome the objections of the Joint Parishes Consultative Committee, Sodbury Town Council and the parish councils of Westerleigh and Dodington.

5.4 One of the purposes of paragraph 11.18 is to encourage the provision of burial sites close to residential areas in order to minimise the need to travel by car. To achieve this will no doubt need different approaches for settlements of different sizes and locations. I see no necessity for an example of where the strategy might apply.

Recommendation

5.5 I recommend that the local plan be modified

i) by deleting from the policy the second paragraph: "Crematoria will not be appropriate within the Green Belt or the Cotswolds AONB", and

ii) in accordance with PC140.

6. Paragraph 11.22 - Emergency Services

Objection

28/002 Avon Fire Authority S03 11.22

Issues

Should the plan include a new policy supporting development to meet the operational needs of the fire authority?

Should amendments be made to paragraph 11.22 to reflect changes in Government requirements of the fire service?

Reasoning and Conclusions

6.1 The fire authority is unable as yet to identify sites for new or relocated fire stations to meet the demands of changing circumstances. By the time it is able to do so, appropriate sites may well already be the subject of an allocation in the local plan. The fire authority points out that if that allocation were for employment, any proposal for a fire station would be tested against policy E3. The fire authority believes that a positive policy allowing such development regardless of the existing allocation of the site is necessary to overcome this potential difficulty.

6.2 The fire service must locate its operational facilities where its ability to respond within an acceptable timescale is not prejudiced by distance from the area to be served, the quality of the highway infrastructure or traffic speeds. Clearly such considerations narrow very much the area of search for suitable sites, and could provide significant weight in favour of a proposal. In the absence of a permissive policy, the proposal would need to meet the requirements of policy E3 for planning permission to be granted. I cannot envisage that there would be any difficulty in meeting criteria A and B of policy E3, but for a proposal to meet either criterion D or criterion E may in some circumstances require a questionably broad interpretation of their terms.
6.3 However, policy LC4 is a permissive policy in respect of community facilities which has similar provisions to those of the new policy suggested by the fire authority. I consider that a fire station is a community facility, and that a new policy would unnecessarily duplicate policy LC4. However, as a fire station is different in kind from the other examples of community facilities listed in paragraph 10.21, my recommendations for that paragraph include an amendment for the sake of greater clarity.

6.4 On the second issue, the evidence shows that circumstances have changed and that it would be appropriate to delete the reference to the completion of the service provision review in paragraph 11.22, as per PC143.

Recommendation

6.5 I recommend that the local plan be modified in accordance with PC143.

7. Paragraph 11.28 - Sewage

Objections

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Issue

Do paragraphs 11.28 and 11.29 represent an adequate commitment by the Council to ensuring all properties are served by an adequate sewerage system, with sewers serving three or more dwellings being adopted?

Reasoning and Conclusions

7.1 Paragraph 11.28 records that Wessex Water will review their new sewerage programme in the light of development proposals. Policy S1A aims to facilitate such provision and I am satisfied that the local plan deals adequately with the question of meeting new infrastructure demand.

7.2 The matter of ensuring the construction of adoptable connections from groups of properties to the main sewer is dealt with in principle at paragraph 11.29. Greater detail is for the development control process rather than the local plan. I agree with PC141, that the reference in the paragraph to Wessex Water is unnecessary since such matters will inevitably require the involvement and co-operation of the relevant sewerage agency.

Recommendation

7.3 I recommend that the local plan be modified in accordance with PC141.


Objections

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Issues

Is the policy unnecessarily absolute in the terms by which it seeks to protect interests of acknowledged importance?

Does the policy place a sufficiently strong emphasis on the need to share facilities?

Should the policy distinguish between the visual impacts of different mast types?

Should the policy include, on health grounds, a restriction on new development around existing masts?

Should the policy be amended to control all telecommunication masts, regardless of height or location?

Does the plan provide sufficient protection for conservation areas from the effects of telecommunications masts?

Are the criteria of the policy necessary in the light of other controls which exist?

Should paragraph 11.40 be more specific in identifying the types of cables and locations where undergrounding should be encouraged?

Reasoning and Conclusions

8.1 The revised deposit draft plan includes an amendment to criterion A so as to protect all residential amenities from unacceptable effects of telecommunications development. This is consistent with other policies in the plan and allows appropriate weight to be given to varying levels of impact, rather than unduly restricting proposals in all areas which are visible from residential properties. As far as criteria B and D and the final paragraph of the policy are concerned, the technical needs of the operator are included as the overriding consideration in each case. This position is reinforced by the supporting text in paragraph 11.31 and especially in paragraph 11.32. I see no reason to make further changes in this respect.

8.2 The sharing of masts and sites is strongly encouraged by PPG8 where it represents the optimum environmental solution and is consistent with the efficient operation of the network. Criterion C of the policy accurately reflects this guidance and in itself represents a strong presumption that facilities will be shared in all appropriate circumstances. To add more imperative could lead to decisions which took too little account of the technical issues or which failed to realise the optimal environmental solution.
8.3 As to the third issue, the thrust of the policy as a whole is that, of the technically acceptable options for antenna provision, permission will be granted to that which minimises environmental impact, and visual intrusion in particular. Criterion C places particular emphasis on the quality of the design and this is reinforced by the second sentence of paragraph 11.32. The policy therefore fully reflects paragraph 40 of the Appendix to PPG8. I do not believe it would be appropriate for the local plan to specify the likely visual impact of design types in the various circumstances. This is a matter properly to be considered as part of the development control process.

8.4 PPG8 relates principally to the installation of new masts rather than the consideration of new development around existing installations. However, it does set out Government policy on the health concerns related to telecommunication masts, following the recommendations of the Independent Expert Group on Mobile Phones (IEGMP). It also makes it clear that, whilst public concern about health considerations can in principle be a material consideration in planning decisions, the planning system is not the place for determining health safeguards. The measures necessary to protect public health are the responsibility of central Government. Further, local planning authorities should not implement their own precautionary policies beyond those already accepted by the Government. The council has proposed a change, PC 142 which would add to paragraph 11.31 a commitment that the council will have regard to the presence of telecommunication facilities when determining certain types of development. Planning legislation already requires that all material considerations shall be taken into account in determining planning applications. I see no justification for repeating this requirement in the text of the local plan. Most especially, considering the wide range of factors that potentially could crop up, there is no justification for doing so only in relation to the one matter of telecommunications facilities, in the face of clear Government guidance to the contrary.

8.5 The Government has set down in the General Permitted Development Order (GDPO) the factors which determine whether a particular telecommunication mast is permitted development, and the conditions to which the permitted development is subject. If a local planning authority were to consider that the permitted development rights should be withdrawn, the appropriate instrument is a direction under Article 4 of the Order, rather than a local plan policy. An amendment to the policy is not therefore appropriate. In any case, paragraph 46 of the Appendix to PPG8 makes it clear that a blanket direction aimed at imposing full planning controls over a wide range of telecommunications developments will not normally be approved.

8.6 Turning to the sixth issue, the policy clearly recognises the need to protect features of historic, architectural or townscape interest in general. In addition, any proposal in a conservation area would fall to be considered under policy L13, which provides the extra degree of protection sought by the objector. There is therefore no need for this to be duplicated by an amendment to policy S4.

8.7 As to the need for the detailed criteria in the policy, I understand that certain developers are subject to licence conditions and much of the control included in the policy is the subject a Government guidance, particularly in PPG8. However, not all developers are code system operators and the PPG does not have the significance in determining planning applications which is accorded by statute to the local plan. The criteria consistently emphasise the overriding need to meet the technical needs of operators while pointing up the need of the planning authority for evidence that those needs cannot be met by an alternative proposal, and that measures to minimise environmental impact have been fully integrated into the proposal. The criteria of the policy therefore provide a clear and necessary framework for the consideration of all proposals.

8.8 I am satisfied that the objection to paragraph 11.30 has been fully addressed by the amendment in the revised deposit draft, which excludes the unnecessary sentence.
8.9 The proposed change PC99, which reverts to the deposit draft version of paragraph 11.39, properly reflects the stated present position of the National Grid Company plc.

8.10 The National Grid Company is concerned that paragraph 11.40 fails to take account of the high financial cost of undergrounding high voltage cables and the environmental harm that the measure may cause. Further, the Company has in any case a statutory duty to have regard to and mitigate the environmental impact of its proposals. I would have sympathy with the objector’s position in this matter were the local plan to include a positive policy regarding undergrounding generally, since such a policy may well fail to reflect properly the reality of the situation, particularly in respect of high voltage lines (i.e. 275kV and above). But that is not the case here. To my mind the words “particularly keen to encourage” in the context of a supporting paragraph is a statement of the council’s general position in relation to the visual impact of overhead wires and their supporting apparatus. It will no doubt usually be more practicable to direct the council’s encouragement to lower voltage lines and particular attention should be paid to the needs of conservation areas. Nonetheless, it would not in my view be appropriate to restrict the statement to those cases alone, when both public concerns and practical opportunities for addressing them may well occur elsewhere.

Recommendation

8.11 I recommend that the local plan be modified in accordance with PC99.