

SOUTH GLOUCESTERSHIRE COUNCIL

**REF: 3003
MATTER 4.1**

**STATEMENT OF SOUTH GLOUCESTERSHIRE COUNCIL
TO MATTER 4.1**

SUBMISSION TO

EXAMINATION IN PUBLIC:

**DRAFT REGIONAL SPATIAL STRATEGY FOR THE
SOUTH WEST 2006-2026**

MARCH 2007

South West Regional Spatial Strategy Examination in Public

Statement of South Gloucestershire Council (3003) Matter 4.1: West of England Sub-Regional Strategy

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

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

A) Is the draft RSS sufficiently clear about the spatial outcomes it is seeking in Bristol, Bath and Weston super Mare in terms of their present and future regional and sub-regional roles and their relationship with the other parts of the HMA

1. The RSS sets out the roles and functions of the three SSCT's in the West of England HMA and highlights the importance of the sub-region as the economic hub of the region. The Vision for the West of England is for continuing high rates of growth in jobs, population and housing enabled by accelerated investment in housing, transport and other social infrastructure, which realises the economic strengths of the West of England, improves the quality of life, and achieves mixed and balanced communities. However the RSS does not reflect this vision for the West of England, nor does it clearly articulate the spatial outcomes it is seeking to achieve, particularly in terms of significant economic regeneration in South Bristol and at Weston super Mare and significant investment in transport and other infrastructure. Policy SR4 provides very little guidance on how the strategy will be achieved or how developments ought to be phased. In addition, it does not articulate the balance between development on green field and brown field land which needs to be achieved. Given the challenging scale of development proposed and the significant amount of infrastructure which has to be planned and delivered, this lack of guidance is a concern.
2. The SSCT's also play an important role as significant centres for employment, retail, tourism and cultural and other activities but this is not articulated in the RSS, nor are there policies setting out how these will be delivered.
3. The policies in the RSS focus on providing housing numbers and expected numbers of jobs for particular locations; for the urban extensions, only suggested housing numbers are set out. It is considered that exact numbers for each urban extension are

unnecessary in an RSS, but that greater emphasis should be placed on the role of these places and how and when development and the associated infrastructure might be delivered. To assist the Panel, a suggested rewording of policy SR4 is attached as part of a Supplementary Statement from South Gloucestershire Council. This also sets out the concerns that the Council has previously expressed in its formal representations on the RSS about the level of detail in the RSS. The Supplementary Statement, with appendices, is attached.

4. It is also suggested that the overall guidance on housing numbers could be expressed much more clearly and succinctly. For example, guidance for housing provision within South Gloucestershire is set out in Figure 4.1 as an annual average on page 61. Further on in the document, in Table 4.1 on page 103, the total figure for the District is set out, again as an annual average. It is suggested that this information is drawn together in a single location in the RSS and that a housing total for each District is provided for the period 2006-2026. This would then set out much more clearly the guidance which local planning authorities require for preparing their LDDs.

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

5. The scale of additional green field development – and specifically the scale of the urban extensions identified for the West of England - has not been adequately justified in the RSS. In particular, it should be noted that the First Detailed Proposals prepared by the West of England Partnership only provided guidance on the broad locations for areas of search and did not attach a specific quantum of development to any particular location. It was acknowledged at the time that further work needed to be carried out on infrastructure requirements, delivery and phasing, green belt assessment and on sustainability appraisal.
6. Further work has now been completed by the West of England Partnership - details are set out in the response to the 4/4 authority request for advice which includes a housing trajectory for the West of England. In addition, South Gloucestershire Council has carried out further work to set out how the overall housing provision figures for the District might be achieved – see Supplementary Statement and Appendices.
7. Both pieces of work demonstrate that there is a broad match up between the likely level of housing requirements and the scale of development which could be delivered through urban renewal initiatives on brownfield sites and the release of a limited number of green field sites, albeit at levels of growth slightly lower than those originally proposed in the RSS. This caution is justified on the basis of

concerns about potential delivery rates and the need to ensure that infrastructure can be provided and comes on stream at the right time. In South Gloucestershire, in particular, peaks in house- building have been followed by periods of lower completions. This trend is likely to continue and it is therefore important that the RSS sets out much clearer guidance on the phasing of development and infrastructure for the West of England and a clear context for work on Local Development Frameworks. It also should be recognised that a significant amount of forward planning work is required to bring forward major new housing sites.

8. In South Gloucestershire, more than half the anticipated requirements (around 13,000 homes) are capable of being met through development within the existing Bristol urban area, adding to and complementing urban renewal initiatives. The development at Filton Northfield, a committed local plan housing site, is a good example of this and will bring forward over 2,000 homes on a brownfield site over the next 10 years. If the total requirement of 21,500 homes is to be achieved, the balance – of around 8,500 homes – would require a number of urban extensions adjoining the Bristol urban area and limited provision elsewhere in the District. Further details are set out in the attached paper.

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

9. South Gloucestershire Council, as part of the West of England Partnership, is committed to delivering the Vision for the West of England. All parties recognise that delivering the scale of growth proposed in the RSS will be challenging, not least because the rate of delivery will require development on a scale not so far achieved in the sub region. The overall housing trajectory prepared by the West of England Partnership provides the background.
10. South Gloucestershire Council has suggested that a build rate of 1,075 homes per year, and a total of 21,500 homes over the period 2006-2026 are more realistic than the figures set out in the RSS. Putting this scale of growth in context, the major Bradley Stoke development on the north fringe of Bristol delivered a total of nearly 8,000 homes, but this was over a 20 year period.
11. Within South Gloucestershire, latest estimates suggest that land will be available for around 12,500 homes for the first half of the RSS period, from 2006-2016. A substantial proportion of this total comprises sites which were allocated in the South Gloucestershire Local Plan under Policy H1. Sites which could accommodate over 500 dwellings include:

- Harry Stoke (1,200 homes)
 - Wallscourt Farm (900 homes)
 - Emerson's Green East (2,750 homes)
 - Filton Northfield (2,200 homes)
 - East of Coldharbour Lane (500 homes)
12. Experience suggests that there are very substantial lead in times for any major site of over 500 homes. Not only does the necessary planning policy guidance have to be developed and master planning undertaken, but also extensive negotiations need to take place with developers and infrastructure providers. The Council has been very successful in securing positive support for new development through negotiation of s106 agreements, but it is acknowledged that these processes can be lengthy. Similarly, community and stakeholder engagement in the planning of these major development sites also has to be factored into the process.
13. For these reasons it is anticipated that further green field urban extensions in South Gloucestershire, beyond those already identified in the Local Plan, should only be programmed to deliver beyond 2016, both to reflect the long lead time involved in planning such sites and to ensure that sustainability and design objectives are fully met.
14. The Council plans to carry out consultation on Issues and Options for its Core Strategy in January – March 2008, with Preferred Options in January-February 2009 and submission in February 2010. As, ideally, the Core Strategy should precede any work on the Sites Allocations DPD or, indeed any site specific guidance on any of the urban extension sites, it is evident that it would be unrealistic to expect any delivery on individual urban extension sites until after 2016.
15. The risk, which is acknowledged, is that the rate and scale of growth being contemplated in the West of England will prove too ambitious for developers and infrastructure providers alike. In South Gloucestershire, there are particular concerns about the rate of delivery of the major transport improvements which are critical to the successful delivery of the overall strategy for the West of England. There is direct experience of the problems caused by a back log in scheme delivery, leading to real problems of congestion, particularly in the North Fringe and we would not wish to see these problems exacerbated or repeated in the future.
- D) Have environmental limits arising from matters such as flood risk and the protection of environmental assets, including the Bath World Heritage Site, been adequately taken into account?
16. In developing the Vision for the West of England and the First Detailed Proposals, account was taken of environmental constraints through the use of a sieve mapping approach. To the extent, then, that the RSS

reflects the West of England Partnership's proposals, then the protection of environmental assets has been taken into account.

17. Further work has been undertaken in South Gloucestershire to consider how the areas proposed for urban extensions might impact on environmental assets. This work is set out in the South Gloucestershire Supplementary Statement, attached.
18. In respect of flood risk, Bristol City Council, South Gloucestershire Council and the Lower Severn Internal Drainage Board, in conjunction with the Environment Agency, have jointly commissioned a Strategic Flood Risk Assessment of the Avonmouth / Severnside Area. This study is approaching completion, but is not yet available. It is recognised that to provide full coverage of the South Gloucestershire, a full set of flood risk appraisal studies will need to be undertaken.

E) Have infrastructure considerations been adequately taken into account

19. No. The references to infrastructure requirements for the West of England in the RSS are inadequate. A much clearer commitment – possibly expressed in terms of a policy - is needed to ensure that essential infrastructure is provided to support the scale of development proposed.
20. The West of England Partnership has identified a significant shortfall in funding for infrastructure which is required to support the delivery of sustainable communities and maintain and enhance the quality of life. "The Costs of Infrastructure in the WoE – Stage 1 – Roger Tym and Partners, March 2006" highlighted particular concerns about funding for transport, affordable housing and community facilities. The process for delivering individual transport schemes on the ground takes a considerable amount of time. Combined with this, there are concerns about the capacity of delivery agencies to deliver on a large number of complex projects simultaneously in the one sub-region.
21. There are also concerns about the phasing of new development and the degree to which this will "fit" with the provision of infrastructure. Given the problems that South Gloucestershire has experienced in the past and the issues it is having to deal with at present, it is absolutely imperative that the provision of infrastructure goes hand in hand with any planned new development. Clearer guidance in the RSS on this issue is essential.

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

22. The West of England is well prepared for dealing with the transport implications of growth. At a strategic level the Greater Bristol Strategic Transport Study (GBSTS) provides a sound framework, which has been developed in detail in the Joint Local Transport Plan and reflected in the current Regional Funding Allocations. This process will need to be repeated, and involve substantially higher levels of investment, if the transport needs of the RSS proposals are to be met and delivered. The Council is very concerned, however, that the RSS does not recognise the extremely high levels of investment that will be needed throughout the plan period in order to provide an appropriate and integrated transport network. The current "Major Schemes" are only the first phase of an ongoing investment programme and a sustained programme of further commitments will be required up to 2026.

G) Are the proposed modifications to the Green Belt adequately justified?

23. The proposed modifications to the Green Belt in South Gloucestershire set out in Policy SR3 include an extension of the Green belt around Thornbury and Yate and a reduction to accommodate the urban extension proposed to the north and east of Bristol. These proposals, it is understood, are based on a study commissioned by the South West Regional Assembly - the Buchanan report. In the Council's view, this report does not provide a robust enough evidence base on which to make strategic changes to Green Belt designation.
24. The Council has produced its own Green Belt Assessment and considers this to be more useful, locally based evidence which may be useful for the Panel to consider.
25. On the basis of this evidence, the Council supports the principle of extending Green Belt designation around Yate and Thornbury, but would also ask that consideration be given to adding in the area around Severn Beach. However we have concerns about the scale and location of the proposed amendments to the Green Belt to accommodate urban extensions in Areas of Search C and D which we consider have not been adequately justified.
26. It is not appropriate for the RSS to define, in policy SR3, where the inner boundaries for the Green Belt should lie, as this is a matter to be addressed by the local planning authorities through their Local Development Framework.

H) Does the RSS set out adequate guidance on the provision of green infrastructure

27. The guidance on green infrastructure is limited to Development Policy F and GI1. It is suggested that more ambitious targets and policy guidance should be set out, particularly in relation to the provision of

green infrastructure in the urban extensions. Only if these areas are planned as an integrated whole – with all the necessary social, economic and environmental infrastructure in place - can there be any realistic chance of delivering sustainable communities for the future.

1st March 2007

SOUTH GLOUCESTERSHIRE COUNCIL

**REF: 3003
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**SUPPLEMENTARY STATEMENT TO
SOUTH GLOUCESTERSHIRE COUNCIL'S STATEMENT
ON MATTER 4.1.**

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**DRAFT REGIONAL SPATIAL STRATEGY FOR THE
SOUTH WEST 2006-2026**

MARCH 2007

South West Regional Spatial Strategy Examination in Public

Introduction

1. This paper has been prepared by South Gloucestershire Council to outline and amplify the Council's position with respect to the proposed scale and location of growth in South Gloucestershire. It sets out supporting evidence which will be of assistance to the Panel and to other participants at the Examination in Public.

Background

2. PPS11 states in paras 1.5 that:

"The RSS should confine itself to matters of genuine regional and, where appropriate, subregional importance. Policies in the RSS will need to be sufficiently detailed to provide clear guidance for LDDs,"

3. In addition, paras 1.16 to 1.17 state that:

"The RSS must not identify specific sites as suitable for development. The DPD is the place for site allocations. Consideration of specific sites could dominate and delay the production of a RSS revision and cause unnecessary blight. The EIP process is not suitable for the hearing of site-specific representations.

The RSS should, however, establish the locational criteria appropriate to regionally or sub-regionally significant housing, business, retail and leisure uses, or to the location of major new inward investment sites. The RSS should only do so where LDDs need this strategic framework. The broad location of such development may be identified in the RSS itself. By "broad location" is meant the area of search suitable for the development in question, consistent with criteria set out in the RSS, within which a number of suitable sites may exist. Broad locations may include town or city centres."

4. PPS12 para 2.10 states that:

"The Core Strategy should set out the long term spatial vision for the authority's area and the strategic policies required to deliver that vision. It should seek to implement the spatial and transport policies of the regional spatial strategy and incorporate its housing requirement. It should set out broad locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community, essential public services and transport development."

PPS3 paras 37 and 38 state that :

“At the regional level, the Regional Spatial Strategy should identify broad strategic locations for new housing developments so that the need and demand for housing can be addressed in a way that reflects sustainable development principles. Regional Planning Bodies should, working with stakeholders, set out the criteria to be used for selecting suitable broad locations for new housing, taking into account:
– *Evidence of current and future levels of need and demand for housing, at the local, sub-regional, regional and national level, as well as the availability of suitable land.”*

“At the local level, Local Development Documents should set out a strategy for the planned location of new housing which contributes to the achievement of sustainable development. Local Planning Authorities should, working with stakeholders, set out the criteria to be used for identifying broad locations and specific sites taking into account:
– *The spatial vision for the local area (having regard to relevant documents such as the Sustainable Community Strategy) and objectives set out in the relevant Regional Spatial Strategy.”*

5. The First Detailed Proposals for the West of England were prepared in the context of the overall vision for the West of England and of the guidance set out in PPS11 and 12 and suggested a scale of growth of 92,500 homes over the period 2006 to 2026. Five strategic locations were identified for more detailed review of their designation as Green Belt, initially as part of further work undertaken by the Partnership and then through Local Development Documents. These were identified as follows:
 - Adjoining Bristol to the south west, within North Somerset and Bristol City;
 - Adjoining Bristol to the south east, within Bath and North East Somerset and Bristol City;
 - Adjoining Emerson’s Green area to the north east of Bristol, within South Gloucestershire;
 - Immediately to the north of Bristol within South Gloucestershire between Harry Stoke and the M32
 - To the south of Bath

6. South Gloucestershire Council formally considered its response to the Draft Regional Spatial Strategy on 17th July 2006 where it resolved to:
 - Express serious concerns about the deliverability of the sub –regional strategy, pending clear unequivocal evidence that the Regional Assembly, the government and regional agencies can deliver the

transport and other infrastructure needed to enable development to take place. The findings of the Greater Bristol Strategic Transport Study demonstrate that there will be significant impacts on the highway and transport network in the North Fringe. Further development will only serve to exacerbate the problems on an already congested network.

- Object to the level of detail specified in the Draft RSS, particularly in relation to the scale and location of urban extensions referred to as Areas C and D. The locations identified as areas C and D are highly valued parts of the West of England Green Belt and perform well in relation to the purposes of the Green Belt, as do other areas adjacent to the Greater Bristol built-up area. In the Council's view it is premature for specific locations to be identified in the Regional Spatial Strategy until further detailed work has been undertaken to justify any release from the Green Belt. These are matters for the Council to address through its Local Development Framework.
- The maximum number of dwellings that could be accommodated in the urban extensions referred to as Areas C and D should not exceed 2,000 to 2,500 dwellings in total.
- That the balance of growth proposed in the Draft RSS between the Strategically Significant Cities and Towns, the proposed urban extensions and elsewhere does not reflect existing commitments and capacities and the need to maintain the vitality of existing settlements. It therefore recommends that the figure for the remainder of South Gloucestershire in Figure 4.1 should be 250 dwellings per year.
- Taking all the above considerations into account, including infrastructure concerns, Green Belt issues, deliverability issues and other constraints, the Council is minded to object to the proposed dwelling requirement for South Gloucestershire and suggests that it should be reduced to a maximum of 21,500 dwellings over the period 2006 – 2026.

Locational Specificity

7. In the Council's view, the RSS should not be setting out detailed guidance about the location and appropriate scale for individual urban extensions; rather these are matters for each local planning authority to consider and resolve in the context of its Local Development Framework. This is indeed the approach recommended in PPS's 3, 11 and 12. Deciding the location, scale and level of growth of urban extensions in a high level strategic document, such as the RSS, tends to preclude the opportunity for full public engagement and consultation on options which the new planning system seeks to promote. In the Council's view, the role of the RSS in this context, therefore, should be limited to setting the overarching principles concerning the strategy for

growth and the overall level of housing provision for the District, leaving the locational detail to be addressed through Local Development Frameworks.

8. This issue of locational detail was considered by the Panel at the recent EiP into the East of England Regional Spatial Strategy. The Panel report is clearly supportive of the view that the RSS should not be too locationally specific. The relevant extract from the East of England panel report is as follows:

“In our recommendations we have sought to draw the demarcation line between RSS and LDDs as high as possible. In other words we have left to the LDDs everything that should reasonable be determined at the local level, and tried to focus the RSS on genuinely strategic matters on which decisions are needed from the regional level. Whilst we are keenly aware that delivery of development needs to be increased in many parts of the region, we do not consider that this would justify the RSS dictating the detailed local decisions. What the RSS must do is lay out the task for LDDs in unmistakable but strategic terms. We believe the approach we have taken is entirely in accord withheld intentions of the legislation and the guidance in PPS11”.

9. The views of South Gloucestershire, on locational specificity, do differ from those of the other three authorities in the West of England. Within the limits set by environmental constraints, in South Gloucestershire there are a range of possible options for the location of a limited amount of future development, each of which may perform differently in sustainability terms. Choices in North Somerset, BANES and Bristol are more restricted due both to administrative boundaries and the clear need for a regeneration focussed strategy, for example in South Bristol and at Weston Super Mare.
10. As stated in the Council’s response statement to Matter 4.1, the current policy SR4 is too prescriptive, inflexible and lacks vision and spatial awareness. It is South Gloucestershire’s considered view that this level of specificity and precision is unnecessary. Moreover, drafted in its present form the RSS precludes local planning authorities in the West of England from fully exploring and testing alternative spatial growth options which would be capable of delivering the sub-regional vision and spatial objectives.

Suggested Approach

11. South Gloucestershire Council suggests that a revised approach is taken to Policy SR4 in the RSS. A proposed revised policy is set out below:

Revised Policy SR3: Housing Supply and Distribution

In the West of England sub-region provision will be made for 87,290 net additional dwellings in the period 2006 - 2026. The distribution will be:

Unitary Authority	Housing Requirement
<i>Bristol City Council</i>	<i>27,250</i>
<i>Bath & North East Somerset Council</i>	<i>13,090</i>
<i>North Somerset Council</i>	<i>25,450</i>
<i>South Gloucestershire Council</i>	<i>21,500</i>

This provision should be met through the LDF system. Each authority in their Local Development Documents will set out proposals for:

- Identifying the broad approach to locating housing growth, and*
- Make sufficient provision through the plan, monitor and manage approach to meet their strategic housing requirements, and*
- Set out a housing trajectory for how sites will be phased and delivered over each 5 year period up to 2026 to maintain a suitable supply of housing land to support the co-ordinated infrastructure programme and the successful economic development of the region.*

In identifying suitable locations for housing development, local planning authorities should adopt a spatial options search approach. This should be based on the principles of sustainable development and should successfully deliver the following spatial objectives:

- 1. Prioritise previously developed land for housing within the Greater Bristol area, Bath and Weston where it can make a valuable contribution to urban regeneration so as to regenerate areas of disadvantage and achieve mixed, balanced sustainable communities in tandem with supporting infrastructure improvements.*
- 2. Identify previously developed land opportunities within other suitable settlements where housing can contribute to maintaining inclusive, self contained, viable and sustainable local communities in accordance with the overall strategy set by Development Policies B and C.*
- 3. Identify urban extensions required for the longer term development of the three SSCTs. These should be located in such a way as to maintain the role and integrity of the Green Belt. They should be planned and developed as sustainable, cohesive and functional communities to deliver a high quality of*

life through high standards of design and green infrastructure, protecting and maintaining environmental assets and landscape settings. Urban extensions should be co-ordinated with transport proposals to ensure all parts of the sub-region benefit from successful economic expansion and continued prosperity.

4. *Promote the provision of green infrastructure through the sub-region through environmental initiatives within urban areas and the new urban extensions, maximising the potential of the Forest of Avon and measures to enable the Green Belt and rural areas to play a positive role in contributing towards a high quality of life for all residents in the sub-region.*
5. *Review the scope for urban extensions to other towns and suitable places in accordance with Development Policies B and C.*

The suggested rewording of policy SR4 should also be read in the context of the Statement of South Gloucestershire to Matter 4.1.

12. This alternative policy is either capable of being read as a single policy or could be sub-divided into two separate policies. One relating to setting the strategic housing requirement and the second, setting out spatial criteria to inform options for selecting sustainable locations for growth. South Gloucestershire Council asks the Panel to consider the merits of this new policy and use it as the basis for replacing policy SR4. If the Panel was to support this new policy approach, the Panel can be more certain that the requirements for guiding and delivering spatial planning in the West of England and South Gloucestershire through the local development framework system, in accordance with PPS12 , will be achieved.

Alternative Approach

13. If the Panel is not supportive of the approach outlined above and is still minded to advise that the RSS should include locational detail, then our position would be as follows:
 - The scale of growth for South Gloucestershire is too high – provision for only up to a maximum of 21,500 homes could be contemplated
 - Support for development in the urban areas and Bristol SSCT being prioritised
 - The proposed scale of growth at Areas C and D is too high
 - Environmental, infrastructure and other sustainability constraints mean that urban extensions are unlikely to be delivered as a single

entity; a series of smaller locations related to existing communities is more practicable

- The capacity for some growth elsewhere in the District has been underestimated
14. The Council has carried out further detailed work to justify this position. This includes:
- The South Gloucestershire Strategic Green Belt Assessment, Appendix 1
 - Sustainability Assessment of the Draft Regional Spatial Strategy Housing Distribution for South Gloucestershire, Appendix 2
 - South Gloucestershire – Constraints to Development, Appendix 3
 - Methodology for Assessing Dwelling Capacities of Potential Urban Extensions in South Gloucestershire , Appendix 4
 - South Gloucestershire - Housing Trajectory, Appendix 5
15. Copies of these documents are attached.
16. In summary, the Council’s position on potential housing provision to meet requirements over the period 2006 to 2026 would be as follows:

Table 1 SOUTH GLOUCESTERSHIRE POTENTIAL HOUSING PROVISION TO MEET REQUIREMENTS 2006-2026

BRISTOL URBAN AREA		
	Permissions, Local Plan allocations and windfalls	13, 000
AREAS OF SEARCH FOR URBAN EXTENSIONS		
To the north of the Bristol built-up area and south of the M4	Several locations	2,400
To the east of the Bristol built-up area	Several locations	2,700
ELSEWHERE	Other urban areas and windfalls	3,400
TOTAL		21,500