

PSM28

**South Gloucestershire
Core Strategy
Examination**

**Position Statement
for
Matter 28:
Communities of the East Fringe
(CS29)**

June 2012

Matter 28 – Communities of the East Fringe

Q1 There is the suggestion that the Council previously supported the idea of some development beyond the existing urban areas on the east side of Bristol. Does this not remain a suitable option to meet development needs during the plan period?

Council response – The Council did not previously support the idea of development beyond the existing urban areas on the east side of Bristol. Between 2005 and 2008, the Council was working within the requirements set out in the Planning and Compulsory Purchase Act 2004. This obliged the Council, working in its role as part of the West of England and under the directions of the Regional Assembly, to test and consider options for growth that were being put forward through the iterations of the emerging RS and RS EiP process, as existed at the time, and also to express these options through the initial stages of the Core Strategy (pre-issues and Issues and Options consultation). To claim that this in any way represented locally derived and evidenced support for the RS growth proposals for removing the Green Belt east of Kingswood, would be to completely misrepresent the situation and the top-down regional plan making process that the Council was required to operate within.

- 1.1 As stated above, the Council's approach to considering development in the Green Belt east of the Bristol urban area was, initially, made in the context of the top down RS growth agenda and spatial strategy. As required the Council tested the option of development within the Green Belt east of Bristol in this context – but it expressed strong and consistent reservations relating to the RS housing level and distribution for South Gloucestershire at every stage of the RS. The situation and circumstances have now completely changed. Firstly, the statutory planning context has changed with the proposed abolition of regional strategies and the introduction of a locally derived approach to plan making. Secondly, circumstances relating to transport infrastructure, population and economic growth have also changed significantly. Given the material changes in national policy and circumstances the RS led approach to development east of Bristol is no longer relevant and is in fact quite historical. Having fully tested the overall level of growth required over the Plan period and considered the location and distribution of this growth through the preparation of the CS and supporting SA process, the Council considers the December 2011 Core Strategy spatial strategy represents the most suitable and sustainable locations for growth during the plan period.
- 1.2 In order to further rebut any misplaced views that the Council has acted inconsistently in the way the CS now considers the Green Belt east of Bristol, it is important to review the chronology and facts as they are so relevant. Green Belt land to the east of Bristol was identified as a location for growth in each version of the RS. The Council engaged in the RS process from First Detailed Proposals published by the West of England in September 2005 to the RS Submission in summer 2006, as it was required to by the statutory requirements of the Planning & Compulsory Purchase Act 2004 and Government policy at that time and in the context of the available evidence. However, the Council continuously expressed serious reservations about the adequacy of the evidence base, the consultation process, and the sustainability appraisal used to justify the detailed numbers and locations set out in the RS. The following provides a brief summary of this as presented from the perspective of South Gloucestershire Council:

i). First Detailed Proposals - The Council's response to the First Detailed proposal was minuted at Cabinet on 9th September 2005 (Examination Reference RD63: para 93) and to the Draft RS at Cabinet 17 July 2006. In summary, the Council considered that the level of growth in the District (at that time 23,000) was the maximum that could be accommodated and expressed serious concerns that the locations for urban extensions were not sufficiently justified and should be subject to further work on Sustainability Appraisal, Green Belt assessment, environmental constraints and infrastructure and delivery. This demonstrates the Council's opposition to the proposals for growth in the BEF. The Council did, as it was required to do, work in partnership with the Regional Assembly for the reasons set out above.

ii). RS EIP - The Council's representations to the RS EIP in 2007 are set out in its Statement and Supplementary Statement to Matter 4.1 (Examination Library Ref: LR14). Again the Council objected to the adequacy of the RS evidence base in justifying the size and location of urban extensions and lack of proper consideration of the potential to deliver the infrastructure required to support the proposed level of growth. This further demonstrates the Council's opposition to growth east of the Bristol urban area. While Matter Statement 4.1 identifies a level of growth that could be provided to the east of the Bristol urban area, this again needs to be placed firmly in context of; firstly the RS /Government led approach to top down growth established by regional and local targets and secondly, economic circumstances and availability of physical infrastructure, particularly transportation, which were the principle drivers that existed at this time. The situation has now clearly changed and to claim otherwise would be contrary to the principles of good planning and Government policy.

iii). Core Strategy Issues and Options - Notwithstanding its reservations as to the level and locations of growth set out in the RS, the Council tested the RS options for growth including land east of Bristol, at Issues & Options in April 2008. As set out in Issues & Options paragraph 14.2 and throughout the document, the Council was clear that it was conducting this consultation in the context of principles of development which had been determined by the RS. However, as a result of the Issues & Options process – which was supported by its own SA, the Council concluded, having further reviewed information presented through the consultation, that development north of Yate and in the Bristol North Fringe would be more sustainable than to the east of the Bristol urban area.

iv). Secretary of State's Proposed Changes to the RS in July 2008 – The events post July 2008 are well known to all parties. In essence the final RS for the South West was never published and there is no prospect it ever will be in its current form. This was due to legal challenges to other regional strategies across the country and the need to undertake further sustainability appraisal technical work and the intention as set out in the Localism Act 2011 to abolish RS's. Since 2008 the Council has recognised the draft RS as a material consideration. However, the weight to be attached to it has progressively diminished as Government policy has changed; to the point where the Council now considers that both the RS itself and the evidence base used to support it must be set aside. It was in this context that the Council completed the remaining stages of the Core Strategy during 2010 and submitted the Plan to the Government in March 2011.

- 1.3 In developing its Core Strategy the Council has carefully considered alternative options for growth on the basis of evidence, consultation and sustainability appraisal. It has concluded that Green Belt land to the east of the Bristol urban area performs less well as a sustainable location for growth in comparison to other locations. The Council's

position on this matter is set out in response to Matter 7 Q2 paragraph 2.11. The RS approach to the location of development is historical and no longer relevant in the context of the Government's planning reforms which have replaced the RS and given responsibility for strategic planning to Local Authorities. In addition there have been major changes of circumstances relating to transport infrastructure and housing requirement which further support the December 2011 Core Strategy approach to managing land use in the communities of the Bristol East Fringe.

- 1.4 The RS spatial strategy for the West of England relied on evidence provided in the Greater Bristol Transportation Study (2006). However, circumstances relating to the transport infrastructure plans which underpinned the proposed urban extension east of Bristol have now significantly altered. In particular the Council is of the firm view that there is now no prospect of the improved rapid transit route from Bristol city centre to Emersons Green before 2020 at the earliest and there is no planned improvement to transport infrastructure in the rest of the area. This position has been clearly set out in Justification for the Strategy for Housing to 2026, March 2011 Appendix 1: Transport Infrastructure (Examination Library Ref: EB21), and South Gloucestershire Council's Response to Inspector's Questions 28th June 2011 – Appendix 3: Transport Analysis Bristol East Fringe (Examination Library Ref: SG5). This has also been reviewed most recently by Atkins – Review of Strategic Transport Case (Examination Library Ref: RD41).
- 1.5 Further, changes in economic circumstances and population forecasts have significantly changed and this has impacted on housing requirement as set out in Matter 8. The Council considers that the December 2011 Core Strategy meets its housing requirement to 2026.
- 1.6 In summary, the Council has not previously supported the idea of development east of the Bristol urban area on green belt land. It did what was required of it in accordance with the draft RS, whilst consistently expressing reservations about the process and evidence base. The Council has, in developing its Core Strategy, asserted its right to bring forward locally determined solutions to meeting its housing and employment needs for the plan period in alternative locations which it considers, on a robust evidence based approach are deliverable and more sustainable than land east of the Bristol urban area. The Council continues to firmly believe, for the reasons explained above, that the Green Belt land to the east of Bristol does not represent a suitable location for growth during the plan period.

Q2 Are there viable transport options capable of improving accessibility in the East Fringe which have not been included in the CS?

Council response – No

- 2.1 Proponents of development in the Green Belt adjacent to the Bristol East Fringe have put forward transport evidence (see TA produced by FMW Consultancy to support representations made by Ms Mulliner respondent number 4012865), which suggests there are viable transport options capable of improving accessibility in the BEF to the extent needed to support strategic allocation(s). South Gloucestershire completely rejects this. As set out in the Atkins Review of Strategic Transport Case (Examination Library RD41) the rationale on transport grounds for the BEF has been considered and its conclusions are most clear that the measures suggested do not present a

viable transport solution(s) that would support the level of growth being promoted by others at the BEF. The reasons for this can be summarised as:

- Whilst the cycling and walking measures supported by bus services promoted by the TA could be delivered – these are not capable of supporting an approach to providing for sustainable travel required for this level of growth alone. Moreover, they do not offer the same level of connectivity as those proposed in the BNF which are supported by the strategic transport infrastructure proposals set out in Policy CS7.
- The TA results claim up to 2016 there is spare network capacity at the BEF however a review of the TA undertaken by Atkins on behalf of the Council rejects this as any urban extension to the BEF would come forward after 2016. No capacity forecasts are provided in the TA to show how the network performs with the development post 2016. It is therefore wholly unreasonable to claim that the transport option promoted by the TA to support the BEF can accommodate all the future transport needs of the site. Moreover, the local road network comprising both the main routes into Bristol and the orbital Ring Road, is significantly constrained. The main routes into Bristol are physically not capable of being enlarged due to their characteristics and heavily built up location, while the Ring Road would require substantial investment which currently is not available.
- As stated in paragraph 1.4 above the Council is of the firm view that there is now no prospect of the improved rapid transit route from Bristol city centre to Emersons Green before 2020 at the earliest and there is no planned improvement to transport infrastructure in the rest of the area. This position has been clearly set out in Justification for the Strategy for Housing to 2026, March 2011 Appendix 1: Transport Infrastructure (Examination Library Ref: EB21), and South Gloucestershire Council's Response to Inspector's Questions 28th June 2011 – Appendix 3: Transport Analysis Bristol East Fringe (Examination Library Ref:SG5). This has also been reviewed most recently by Atkins – Review of Strategic Transport Case (Examination Library RD41). The TA suggests that this can be overcome by a shuttle bus service connecting to the NFHP near Parkway. This would provide an indirect connection to Bristol city and is not considered satisfactory.
- The West of England Partnership is progressing a major scheme for the Greater Bristol Metro. This will provide a comprehensive suburban heavy rail network throughout the West of England, which will be delivered over the plan period. Unlike the BNF and Yate there is no heavy rail available in or near the BEF. Hence, the BEF would not in any way benefit from this investment. It therefore makes little sense and is not good planning to promote the BEF either instead of or in addition growth locations identified in the December 2011 Core Strategy which can and will.

2.2 Therefore contrary to the claims made by those challenging the Core Strategy, the viability of the transport options being promoted to support the future travel demand arising from the BEF have not been satisfactorily tested. As a consequence, the Council continues to believe that a viable solution capable of providing a sustainable transport package for improving accessibility in the Bristol East Fringe to support strategic growth in excess of 3,000 dwellings and supporting employment and community facilities has not been put forward by the site's promoters.

Q3 Do detailed concerns affecting land ownership negate the principles expounded in the Plan to developing Green Infrastructure and other facilities?

Council response – No.

- 3.1 The principles of Green Infrastructure (GI) expounded in the Core Strategy, are best summarised within the objectives set out in policy CS2. To varying degrees these objectives can be applicable to the Green Infrastructure assets regardless of ownership. A good example of this position would be to consider wildlife habitats, as wildlife has no regard to land ownership it is important that the policy applies to all areas regardless of ownership. It is not intended that all objectives be equally pursued regardless of ownership, for example privately owned sites that are generally not accessible to the public, whilst potentially beneficial to wildlife, they would not be recognised for their recreational value.
- 3.2 As set out in response to Matter 6 question 2 the Council considers policy CS2 to be in conformity with paragraph 81 of the NPPF. This paragraph of the NPPF requires local planning authorities to plan positively to enhance the beneficial use of the Green Belt in relation to opportunities for access, opportunities for outdoor sport and recreation; to retain and enhance landscape and visual amenity and biodiversity. These uses are set out in policy CS2 and identified priorities applicable to areas of Green Belt in the East Fringe of the Bristol urban area are set out in policy CS29, however the objectives of policy CS2 will be pursued across the Green Belt in accordance with the NPPF.
- 3.3 The Council recognises, at paragraph 5.33 of the Core Strategy in support of policy CS2, that it needs to work in partnership with the public, private and voluntary sectors, to enhance the provision, delivery and planning of green infrastructure.

4.0 Conclusion

- 4.1 In conclusion, the Core Strategy has appropriately considered the suitability of the Green Belt land to the east of the Bristol urban area as a sustainable location. Circumstances are now quite different to those that existed at the time the RS was being prepared. Moreover, having technically reviewed the transport case put forward by those challenging the Core Strategy, the Council does not consider this to be sustainable and would result in a less appropriate outcome when compared to the preferred approach to focusing and fostering transport investment as presented by the Council. The Inspector is respectfully asked to take these matters into consideration.