

South Gloucestershire Core Strategy Examination in Public

Day 3 Thursday 21st June 2012

Matter 22: Communities of the North Fringe Filton

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on behalf of

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MATTER 22 – COMMUNITIES OF THE NORTH FRINGE/ CRIBBS/PATCHWAY / EAST OF HARRY STOKE AND UNIVERSITY OF THE WEST OF ENGLAND – POLICY CS25, CS26, CS27 & CS28

- 1 Is it feasible to accommodate the scale of development envisaged in the North Fringe areas without increasing levels of congestion?**
- 1.1 The short answer to the question, as phrased, is, “No.”
- 1.2 However, if the question was rephrased to ask *‘Is the increased level of congestion caused by the scale of development envisaged in the North Fringe likely to be acceptable?’* we believe that the answer is likely to be “Yes.”
- 1.3 South Gloucestershire Council (SGC) has commissioned an assessment of the transport impacts of the proposed New Neighbourhood developments. This work, undertaken by Atkins for SGC, uses an updated traffic model, the Core Strategy Model, to predict conditions in 2031, first without CPNN and EHSNN and then with. The assessment assumes that a package of transport measures, the North Fringe Transport Package, will be delivered to accommodate the developments and to mitigate their impacts.
- 1.4 The results of this work have been shared with land owner/developers’ consultants at a series of meetings and the results were reported most recently in a document titled ‘North Fringe Transport Review’, dated May 2012 which, we assume, will be submitted to the Inspector by SGC.
- 1.5 The assessment predicts that, if the North Fringe Transport Package is delivered alongside the development, total car trips in the North Fringe over a 12 hour weekday would increase by 10%. The work also predicts a rise of 125% in public transport use and of 20% in walking and cycling.
- 1.6 At the time of writing, we have not received sufficient information on Atkins’ modelling work to enable us to lend unequivocal support to the output of the North Fringe Transport Review. Indeed, we are somewhat sceptical about the likelihood of securing 125% growth in public transport trips. However, we are generally supportive of the methodology, and with one exception (see answer to question 2), of the scope of the North Fringe Transport Package. We consider the Package likely to be deliverable in association with CPNN and EHSNN, both in terms of funding and practicality and, consequently, we consider it likely that the model predictions are broadly correct.
- 1.5 On this basis, we consider that the increased road traffic impacts of the development would most probably be acceptable.
- 2 Is there scope to utilise Filton Airfield to improve traffic flows in the North Bristol area?**
- 2.1 We have expressed concern in our responses to Matter 14 about the need to plan for greater movement between Avonmouth/Sevenside and the North Fringe. With this in mind, we consider that a strategic road link should be provided across Filton Airfield to cater for east/west movement both between Avonmouth/Sevenside and the North Fringe and within the North Fringe itself. Our view is that a strategic transport master plan is needed for CPNN but that this document should be prepared following adoption of the Core Strategy. However, the Core Strategy does need to provide strategic context. With this in mind we have suggested amendments to paragraphs 7.6 and 7.12 of the Core Strategy in our response to Matter 14.
- 2.2 Furthermore, it has become clear recently at meetings with SGC and the land owners/developers’ transport consultants that the network of local connections indicated on Figure 6 of the Core Strategy through the airfield site are seen as local, low speed roads that are not intended to serve or attract significant east/west traffic.

That movement is considered by SGC to be served by the existing dual carriageway network to the north that connects M5 Junction 17 to the A38. Noting the advice in DfT's Manual for Streets, which advocates joined up street networks, and the increased burden that this strategy would place on the motorway junction, we think that an area as large as CPNN, which sits astride a wider strategic arc from Avonmouth/Sevenside to and through the North Fringe, should include one east to west route of more than local status. Such a route would cater for east-west movement within the North Fringe, could serve as part of a strategic connection between Avonmouth/Sevenside and the central and eastern parts of the North Fringe, and would provide flexibility of route choice in the event that congestion occurs on the established parallel routes to the north.

- 2.3 It is important to incorporate a strategic route of this nature within the Core Strategy because, being corridor based, if not secured at this stage, the opportunity will be lost for the foreseeable future.

3 Is the possible identification of a major sports facility in this area a good use of urban land or are there alternative locations better suited for this purpose?

- 3.1 DF SR supports the use of land in the Haw Wood area as a major sports facility serving existing and new communities alike. This would partly replace and partly enhance the facilities already present alongside the A4018.

- 3.2 Since there is a long-established relationship between these facilities and communities within Bristol and since there is insufficient land within the City boundary to provide their equivalent, DF SR is satisfied that the development of multi-use, community based sports facilities is a very good use for land in this vicinity.

- 3.3 The location of an international-standard cricket ground, with the limited use that such facilities attract, seems to be less-well founded.

4 Is there sufficient flexibility in phasing arrangements to ensure housing can be brought forward on other sites in the North Fringe areas if those being developed are not completed to schedule?

- 4.1 We have set out in other representations that we believe that the overall capacity of the CPNN has been underestimated and that it should be increased to 'up to 7,000'.

- 4.2 Furthermore, we have also set out that the phasing of the development at the CPNN, shown in CS15, has underestimated the area's capacity for early development. This is because large parts of the CPNN – particularly the land to the west of the A4018 – are free of serious constraints and development is able to begin relatively quickly.

- 4.3 In addition, the delivery of housing in South Gloucestershire has, historically, lagged behind the area's requirements.

- 4.4 Taking the above points together, we submit that there is no reason to 'backload' the delivery assumptions for the CPNN in the way that CS15 does. Provided that the Core Strategy is adopted with the area currently identified as the CPNN, *and* provided that the landowners work together with the local planning authority on the proposed Supplementary Planning Document, then there is no reason why the CPNN should not deliver significant numbers of houses in the first two phases – as much as 3,000 up to 2021 rather than the 1100 anticipated in CS15.

- 4.4 We calculate this provisional figure on the early assumption that there will, effectively, be three separate 'centres' of development in the CPNN – the land to the west of the A4018, the land to the south of the Airfield and the Airfield itself. Assuming that, at peak, each of these is able to deliver, say, up to 200 dwellings p.a., then it is not unreasonable for the Core Strategy to make the following provision:

- Up to 2016 – land to the west of A4018 and land to the south of the Airfield¹: 500 dwellings total
- 2016 – 2021 – all three ‘centres’ – 500 p.a. = 2,500 dwellings over 5 years.
- 2021 – 2027 – land to the south of the Airfield and the Airfield² – 400 p.a. – 2,400 dwellings over 6 years

4.5 The assumptions are, necessarily, broad – that the land to the west of the A4018 and the land to the south of the Airfield is less constrained and more readily available than the Airfield itself. As noted above, this latter assumption may well be over-pessimistic with the result that early delivery could be even higher.

4.6 Thus, we believe that there is more flexibility in deliverability than is anticipated by the local planning authority and that the CPNN will be able to take up as much as 2,000 dwellings of any ‘slack’ created by the failure of other sites to deliver as scheduled, particularly in the crucial period up to 2021.

5 Should policy CS26 be revised to reduce complexity and, if so, how could this be achieved?

5.1 Under different circumstances, we might argue that the Core Strategy should be simplified, setting out no more than the outline of housing numbers and supporting land uses and the basic infrastructure packages, leaving the detail to a future Development Plan Document or (as the local planning authority proposes) a Supplementary Planning Document.

5.2 However, in this case, it seems that some of the landowners with whom the local planning authority wishes to ‘partner’ in the development of the CPNN may wish to pursue their own planning applications, even if that means working independently of the local planning authority and other landowner interests.

5.3 We agree with the local planning authority that it is vital that the CPNN be developed within a strong master planning context in order, amongst other things, to secure the proper and orderly delivery of the necessary social, community and transportation infrastructure. It is unlikely that this can be achieved simply through the development management process and, in the event that it proves impossible for the parties to unify behind a SPD/Development Plan Document, then we commend to the Inspector that the Core Strategy itself should provide the strongest and most detailed framework possible, which is what CS26 is attempting to do.

5.4 Thus, in the current circumstances, we submit that CS26 should not be reduced in complexity. On the contrary, if it proves impossible to obtain developer support for a comprehensive master planning approach led by the local planning authority, then there could a case for the policy to be developed into even *further* detail.

6 Is it realistic to expect the range and type of facilities required can be provided as part of the Cribbs/Patchway New Neighbourhood?

6.1 The core requirements of CS26 are housing (plus Extra Care), employment uses, consolidation of the Cribbs Causeway/Mall Regional Centre and widening of the range of uses and a range of local centre uses.

¹ The assumption here is that the Airfield land will not be able to deliver housing before 2016. If the assumption is wrong, then the ‘early delivery’ figure will increase accordingly

² The assumption here is that the land to the west of the A4018 will be completed by 2021. The timing of the 1,000 dwellings allocated in CS15 to the area to the north is unknown and so these have been omitted from this calculation.

6.2 DFSR is committed to the principles and practice of sustainable development and has made the case that the CPNN, including the land to the west of the A4018, is in an extremely sustainable location with regard to the existing urban area, a wide range of services and facilities, employment and public transport. DFSR recognises that mixed-use development and a measure of 'self containment' are integral to sustainable development and, so supports the range of uses promoted for the CPNN.

6.3 However, CS26 goes further than simply identifying the principal uses. It also sets out the range of social, community and transport infrastructure that will be required to be provided as part of the CPNN development. Again, DFSR supports the local planning authority's approach to this – their experience is that it is vital that such infrastructure is provided at the earliest possible point in such a major development and they make two general points:

- Since the land to the west of the A4018 is relatively constraint-free, it is in an excellent position to make early contributions to the provision of infrastructure throughout the CPNN
- Skanska is a worldwide organisation with huge experience in funding, partnering and providing a wide range of infrastructure – and is corporately committed to the principles and practice of sustainable development. DFSR is, therefore, in a unique position to assist the local planning authority in achieving its aim of sustainable development and timely provision of infrastructure.

6.4 That said, DFSR has the following comments on the particular infrastructure requirements of CS26:

- *Sports facilities* – We support this aspiration. As noted above, the development of the land to the west of the A4018 will incorporate the rationalisation and improvement of a range of sporting and recreational facilities for the benefit of existing as well as future residents.
- *Green Infrastructure* – the protection and extension of Haw Wood has consistently been a fundamental part of the DFSR proposals, as has their commitment to the use of water/SUDS as a green landscape feature and the provision and improvement of greenways for pedestrian and cycle use.
- *Transportation* – with the comments set out above and in Matter 14, DFSR is committed to working with the local planning authority to achieve the CPNN Transport Package. In particular, we support the development of footpaths, cycleways and bus transport – and especially the re-opening of passenger rail in the area – as a part of that Transport Package. All of this, DFSR submits, is achievable within the context of such a major development. One major element of this that is not yet properly reflected in the CPNN Transport Package is the need for a strategic East-West road link as part of the development of the Northern Arc.
- *Community Infrastructure* - DFSR entirely supports the need for primary and secondary schooling facilities to be provided as a part of the CPNN along with a range of local centre uses located where they are most easily accessed by *existing*, as well as future, residents.

7 Development of the new neighbourhood East of Harry Stoke is predicated on the provision of the Stoke Gifford Transport link. What implications does this have for delivery of the CS should the link be delayed through lack of funding or for other reasons?

7.1 The delivery of the development East of Harry Stoke and of the Stoke Gifford Transport Link (SGTL) are firmly connected.

- 7.2 Paragraph 4.46 of Atkins' North Fringe Transport Review explains that the SGTL **"...will provide access to blocks of development in EHSNN. It will also enable pedestrians and cyclists to cross the railway line, and will form one of the key elements of the BRT corridor in the North Fringe – Hengrove Package."**
- 7.3 It follows, therefore, that the SGTL is crucial to the delivery of the EHSNN, at the very least because it provides access to some of the EHSNN site.
- 7.4 Furthermore, in meetings between SGC and land owners/developers' transport consultants, the report authors, Atkins, have explained that SGTL is critical in removing trips from the local motorway network, meaning that its introduction must provide relief to local junctions including the M32/A4174 and M4/M32. Hence, if the SGTL is delayed, the delivery of at least a part of the EHSNN would be delayed because, without SGTL, the development traffic would exacerbate problems at local junctions which would not, by then, be relieved by diversion of traffic onto SGTL and by the introduction of the North Fringe to Hengrove BRT.
- 7.5 However, as we have set out in our response to Question 4, we believe that there is sufficient capacity in the early phases of CPNN to make up for any delay in the early delivery of sites elsewhere in the North Fringe.

8 Are proposals for revised Green Belt boundaries both to the west of the A4018 and as part of the East of Harry Stoke New Neighbourhood appropriate?

- 8.1 DFSA can comment only on the land to the west of the A4018.
- 8.2 Our first point is that, as set out in our response to Matter 6, we believe that the local planning authority has properly identified the Exceptional Circumstances necessary to justify the removal of the land from the Green Belt. Essentially, these are:
- There is a need for new housing in South Gloucestershire. We believe that the Exceptional Circumstances are demonstrated even at the level of provision (26,400) proposed in the Post Submission Changes version of the Core Strategy (PSC). However, we also submit that the actual level of provision should be set higher than this, emphasising the Exceptional Circumstances even further.
 - The land to the West of the A4018 is in one of the most sustainable locations in the District. It is superbly located in relation to the existing urban area, employment opportunities and existing facilities and especially to public transport (at 13 buses per hour in each direction, it is better connected by public transport than many inner city areas) This is entirely consonant with the local planning authority's 'Urban Fringe first' approach, which DFSA explicitly supports, and enhances the site's credentials for allocation over very many of the alternative sites being put forward – particularly sites beyond the outer edge of the Green Belt that are poorly connected with the urban area.
- 8.3 Our second point, made in relation to Matter 6, is that the removal of the land from Green Belt does not harm the Green Belt since the land no longer serves the five functions of Green Belt.
- 8.4 Our third point is that the incorporation of the land to the west of the A4018 into the CPNN will bring major benefits and advantages:
- *Early delivery* – the land is relatively constraint-free and there is every prospect that housing delivery could begin in 2014/15
 - *Infrastructure* – the other side of the 'constraints' coin is that (unlike a number of other sites) the land has few major site preparation costs and, thus will be able to make a full and early contribution to the infrastructure 'pot'.

- *Sports facilities* - there is potential to create a centre of sporting excellence as an integral part of the development
- *Green Infrastructure* - there is major potential to improve the green infrastructure of the area and, especially with the planting of the M5 ridge, this will bring major visual and noise improvements for existing residents as well as the residents of the remainder of the CPNN

8.5 Our final point relates to the location of the revised boundaries. We have made submissions based on the M5 being the defensible long-term boundary for the Green Belt (a point acknowledged in the past by the local planning authority itself) and, in principle, we continue to promote that boundary.

8.6 However, the local planning authority has put forward a boundary running along Berwick drive, to the north of Haw Wood, retaining Haw Wood and the adjacent playing fields within the Green Belt.

8.7 We point out that it is not necessary to retain Haw Wood in Green Belt in order to protect it – measures such as TPOs are all that is necessary for that. However, it has always been DFSA's intention to retain and extend Haw Wood and their proposals have always assumed that the area to the south-east of the wood would be utilised for outdoor recreation purposes, albeit with associated buildings and facilities. All of these proposals are consistent with the southern part of the land remaining in Green Belt and, thus, we do not resist the boundary proposed by the local planning authority.