



**SOUTH GLOUCESTERSHIRE COUNCIL**

**CORE STRATEGY 2006-2026**

**EXAMINATION**

WRITTEN STATEMENT ON BEHALF OF REDROW HOMES SOUTH WEST  
IN RELATION TO

**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)**

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1.0 **INTRODUCTION**

1.1 This written statement has been prepared by Nathaniel Lichfield & Partners on behalf of Redrow Homes South West.

2.0 **OVERALL ISSUES**

**Q1. Is it feasible to accommodate the scale of development envisaged in the north fringe areas without increasing levels of congestion?**

2.1 We support the Key Diagram as proposed. It currently provides an appropriate level of certainty regarding proposed access points but defers consideration of more detailed internal layout to subsequent stages. As set out in the Key Diagram associated with Policy CS26, one of the primary access points to serve the CPNN is located off Charlton Common Road. Our client has recently obtained planning permission for this access point and demonstrated its suitability as part of the wider comprehensive development.

2.2 We believe that it is feasible to accommodate the scale of development envisaged in the north fringe areas without increasing existing levels of congestion subject to the delivery of a reasonable transport package which seeks to:

- 1 Address current travel choices;
- 2 Provide sustainable travel choices for the proposed new neighbourhoods; and
- 3 Take account of existing congestion.

2.3 The 'North Fringe Transport Review', which forms part of the evidence base supporting the emerging Core Strategy seeks to demonstrate the deliverability of the proposed growth in the north fringe area by addressing the above three key issues. We believe that the above broad approach is appropriate in principle although further clarification on sources and scale of infrastructure funding is required.

- 2.4 We believe that the proposed development in the North Fringe, particularly the Cribbs/Patchway New Neighbourhood (CPNN) will contribute towards improving connectivity and accessibility by sustainable modes of travel for the wider area. As part of a comprehensive transport package, the proposals will therefore assist in addressing current travel choices, provide travel choices for the new neighbourhoods and in turn tackle existing congestion.
- 2.5 We note that a key component of the proposed transport package is the 'smart choices' initiative aimed at encouraging sustainable travel behaviour to promote walking, cycling and public transport. We believe that this component of the transport package is central to the delivery of the North Fringe development in terms of minimising any adverse impact on existing levels of congestions.
- 2.6 Whilst we believe that additional clarification/clarity is required to substantiate the Transport Review and its delivery in due course, as set out above, we endorse the broad approach adopted by the Council.
- 2.7 We do object however to the Transport Review seeking to influence the layout and use of the proposed new neighbourhoods at this early stage. With regard to CPNN, discussions are ongoing with the Council and the development partners on the evolution of a masterplan for the delivery of the new neighbourhood and within this context assumptions made within the Transport Review on the location and use of key access points would appear to be premature.
- 2.8 As set out above, we believe that the proposed new neighbourhood would improve connectivity and accessibility within the wider area and careful consideration needs to be given to the detailed layout of the proposed development. As it stands, the Transport Review seeks to restrict the use of the permitted access at Charlton Common Road to pedestrians, cyclists and busses only, this conflicts with the Key Diagram notation and the planning permission that has been granted. We consider that discounting the use of the permitted access for all traffic movements, including private cars is not only pre-mature but unreasonable on the basis that planning permission for an unrestricted access has already been granted.

**Q2. Is there scope to utilise Filton Airfield to improve traffic flows in the north Bristol Area?**

- 2.9 We strongly believe that the proposed new neighbourhoods can improve traffic flows in the north Bristol area. With regard to the CPNN, the proposals could provide a key north-south link connecting Brentry with Catbrain and most importantly, providing the opportunity for existing residents to the south of Filton Airfield to access the service and facilities at Cribbs Causeway through a variety of transport means.
- 2.10 On behalf of our client, we recently obtained planning permission for one of the key access points envisaged in Policy CS26 Key Diagram at Charlton Common. The permitted access has the potential to facilitate the above north-

south link and the orientation and layout of this route within the wider masterplan is the subject of current discussions with the Council and other development partners.

**Q3. 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 use?**

- 2.11 We do not consider that the location of a major sports facility within the north fringe development area has been justified. The need and justification for such a facility at this location remains unclear given the availability of alternative locations within Bristol City.
- 2.12 We note that planning permission for a new 30,000 seat stadium at Ashton Vale, Bristol remains extant.

**Q4. 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?**

- 2.13 We consider that the delivery of the planned development in the North Fringe should not be constrained by rigid policy led phasing criteria instead the emphasis should be on creating the right environment to maximise delivery of housing and associated infrastructure. We believe that the introduction of artificial phasing/timescales can hinder delivery as it reduces the ability of the market to respond to changes in circumstances.
- 2.14 The need to *“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs”* is one of the core land-use planning policies which should underpin both plan making and decision making (NPPF, paragraph 17). It is within this context that the emerging Plan should seek to proactively drive and support the new neighbourhoods to meet housing need and assist economic recovery. This also reflects the overarching and cross-cutting objective of the emerging Plan to *“deliver sustainable communities”*.
- 2.15 Again, the introduction of artificial phasing would undermine the above objective, by reducing the Plan's ability to respond to changing circumstances.

**Q5. Should Policy CS26 be revised to reduce complexity and, if so, how could this be achieved?**

- 2.16 We believe that Policy CS26 can be amended to focus specifically on the delivery of the CPNN.
- 2.17 As it stands, Policy CS26 includes the full rationale behind the proposed allocation including the wider objectives it seeks to secure. We consider that the development objectives are better set out in the supporting text and that the Policy itself should be restricted to key development principles including the quantum and mix of uses proposed accompanied by the Key Diagram.

- 2.18 In addition, we believe that reference in the policy to a future Supplementary Planning Document that would set out an area-wide masterplan is inappropriate. As it stands, Policy CS26 requires future development proposals to be in accordance with a masterplan that has not been prepared. Preparation of the masterplan needs to be an inclusive and collaborative process. The supporting text should instead set out the process behind ensuring the comprehensive delivery of the CPNN including preparation of an SPD if necessary.
- 2.19 We consider that the Key Diagram associated with a revised Policy CS26 could provide sufficient detail to ensure the delivery of the CPNN in a manner that would satisfy the objectives of the emerging Plan. It is unclear how the masterplanning process will unfold, how competing land owner interests will be reconciled and the extent to which a protracted masterplanning process could delay essential development. Importantly, Policy CS26 is seeking to afford undue weight to a potential future document that would not form part of the statutory development plan.
- Q6. Is it realistic to expect the range and type of facilities required can be provided as part of the Cribbs/Patchway New Neighbourhood?
- 2.20 The proposed CPNN is located to the immediate south of Cribbs Causeway which is an established major sub-regional centre. The emerging Plan is seeking to designate it as an emergent centre with an additional 17,000 sq m of new comparison floor space envisaged in the period to 2026.
- 2.21 The development proposals for the new neighbourhood seek to deliver enhanced connectivity to Cribbs Causeway and beyond and we therefore consider that there is only scope for local needs retail provision within the new neighbourhood.
- 2.22 We consider that in principle the range and type of facilities required could be provided as part of the new neighbourhood, including local needs retail. However, this is clearly dependent upon commercial viability and therefore requiring a firm commitment on delivery through Policy CS26 at this stage without a thorough assessment of viability is unreasonable and may prejudice the deliverability of the CPNN as a whole.
- 2.23 Whilst the provision of some local community facilities for the proper planning of the area will be essential (e.g. primary school, public open space etc) the Council will need to be realistic about the level and nature of more flexible elements (e.g. affordable housing) once viability is more clearly understood.
- 2.24 The Council is at a very early stage with regards to the preparation of a CIL Charging Schedule and its associated evidence base. This will clearly form a key consideration in understanding development viability. It is therefore important that additional flexibility is built in to Policy CS26 that recognises the importance of development viability in the overall deliverability of the CPNN.

Matter 12 / 23 Nov 2010

Personal ID: 206

Representation No: -