

**DRAFT MAIN MODIFICATIONS TO THE SOUTH GLOUCESTERSHIRE CORE STRATEGY:**

**NOTE FROM INSPECTOR: ADDITIONAL HOUSING SITES**

**REPRESENTATIONS ON BEHALF OF REDROW HOMES (ID:320737)  
LAND AT HAMBROOK, EAST OF THE M32 AT B4058 BRISTOL ROAD/A4174  
AVON RING ROAD, (REF: SHLAA SITE 094)**

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Introduction

1. The Inspector, in his Note dated 11<sup>th</sup> January 2013, has asked the Council to prepare a further paper explaining the reasons why it has chosen the land to the East of Morton Way, on the North East outskirts of Thornbury, over other possible locations to meet the identified shortfall in housing provision. At the same time he has also invited representations from other participants on the following two matters he wishes to consider further in the context of the conclusions he arrived at in his draft modifications:

Whether the additional dwellings the Council has identified (594) are valid sites which are potentially deliverable in the first five years of the plan period and do not result in double counting of other sources e.g. windfall allowances.

2. We do not propose to respond on this matter.

The relative merits of various sites at a number of locations including (in no particular order) Thornbury, Yate/Chipping Sodbury, Severnside and the East and North Fringes. Factors to consider include the degree of coherence with the Plan's vision and spatial strategy, site capacity, deliverability, having regard to constraints including infrastructure provision and transport connections and how effectively the site could be assimilated into the existing settlement pattern.

3. We agree with the Council that in circumstances where additional housing needs to be provided in the first five year plan period in order for the Core Strategy to be found sound and compliant with the NPPF, the shortfall should be addressed through the plan-making process and not outside it i.e. via some informal non-statutory Interim Housing Statement. Such a course of action would, in our view, only sustain rather than resolve the current uncertainty about housing delivery. It would not provide for proper independent scrutiny of the necessary objective assessment of the relative sustainability of candidate sites and would inevitably lead to further delay and/or planning by appeal on a first-come first-served basis. Indeed, we maintain our consistently held position that the plan cannot be found sound until it can be clearly demonstrated that it seeks to meet objectively assessed development requirements in full, consistent with the principles of sustainable development. The position the Council finds itself in now, we say, is a direct consequence of its failure, contrary to the requirements of the NPPF, to properly consider the options for sustainable development on land hitherto the subject of Green Belt policy.

4. We are consequently of the view that the Council is right to seek to identify further land now in the context of the Core Strategy rather than agree to delay matters after its adoption. However, we say that the Council's justification for singling out the 'omission site' east of Morton Way between Crossways Lane and Gloucester Road, to meet the identified shortfall in housing delivery, is fundamentally flawed. This is because it appears to be largely reliant on rejecting "*other locations potentially available.... From rural villages and/or Green Belt locations*" which it says would conflict with the Inspector's Main Modifications (Ref: SGC's response to Inspector's Preliminary Findings and draft Main Modifications (16.11.2012)). Our case has consistently been that there are Green Belt locations which are more sustainable and which sit four-square with the Vision and Spatial Strategy and should therefore not be ruled out as a matter of course before a proper even-handed assessment is carried out.

5. Right from the outset of the Examination process we note that the Inspector was unequivocal in making clear his concerns that:

*"The Council's limited and piecemeal approach to the Green Belt brings into question the validity of its approach to assessing development potential."*

(Ref: Inspector's letter to the Council in August 2011 (Doc: PA6))

6. It follows therefore that the lack of a proper review of Green Belt, which has been the basis for our objections to the Inspector finding the Core Strategy sound, reinforced by the Council's admission that it has again effectively ruled out Green Belt adjustments, calls into question the validity of the Council's choice of site. It is also disingenuous of the Council to imply that any consideration of any Green Belt options would be at odds with the CS once modified in accordance with the Inspector's recommendations given that its earlier 'piecemeal approach' was cited as justification for adjusting the Green Belt boundary at Cribbs Causeway and Harry Stoke.

7. Redrow's land at Hambrook to the east of the M32 motorway (Ref: SHLAA Site 094) (see attached site location plan) extends to some 10.06 hectares (gross) and has the potential capacity to accommodate approximately 190 dwellings. It forms part of a larger area of Green Belt identified as 'Area 10' in the Council's 'so-called' Green Belt Review of 2006, part of which i.e. land at Harry Stoke, is proposed for release from the Green Belt. We do not see any good reason why the land to the east of the M32 should be treated any differently.

8. The land to the east of the M32 is in an equally sustainable location as the balance of Area 10 which is identified by the Council for release. Indeed in the Council's own words (Ref: Green Belt Review Table 4), it "*adjoins the existing Bristol conurbation*" and "*benefits from nearby public transport improvements*" (Ref: SGCS Figure 3, Inset to Figure 2 – Strategic Transport Infrastructure proposals Diagram). It also lies 'within' or to the south of the M4 motorway which is a readily recognizable feature and likely to be permanent (Ref: NPPF Paragraph 85), and is otherwise generally regarded as providing a logical long term defensible inner boundary to the Green Belt.

9. The site is located on the existing northern limits of the built-up area of Greater Bristol to the north of Frenchay and to the south east of the village of Hambrook. The southern boundary of the site is defined by the A4174 Avon Ring Road which was constructed in the early 1990s. The Frome Valley and the Hambrook mark the east and northern boundaries respectively, while the B4058 Bristol Road together with the boundaries of a number of properties, a funeral directors and a small brewery, which all take their access from Bristol Road, define the western limits to the site.
10. The site for the most part is flat but falls away along the north and western boundaries towards the Hambrook and the top of the steep valley side of the River Frome. There is very little vegetation on the site; it being last used for agriculture.
11. As previously indicated to the Council, Redrow's land at Hambrook has been the subject of a number of technical studies. Flood risk is confined to the bed of the stream which runs in a narrow steep sided valley along the site's northern boundary and in the Frome Valley to the east. This also comprises an SNCI and a broader swathe of land following its course has been excluded from the net developable area in order to accommodate the Strategic Green Infrastructure indicated here at Figure 1 of the SGCS.
12. Access has been discussed with the Council in respect of both an all-movements junction onto the B4058 Bristol Road, and a left-in left-out junction on the A4174.
13. The land at Hambrook is equally in tune with the Plan's vision and spatial strategy as the identified Green Belt releases at Cribbs Causeway and Harry Stoke. Just as with those sites, the development of this land within the North Fringe will provide further opportunities for people to live near to where they work which is seen as continuing to be the main economic driver in the South West region and the West of England sub region. Development here would sit four-square with the existing settlement pattern and the overall spatial strategy.
14. The estimated capacity of 190 dwellings has regard to the need to secure the strategic green infrastructure and preserve the setting and distinctiveness of the neighboring village of Hambrook. The fact that the estimated capacity would not meet the total shortfall should not count against it. There is no reason to exclude a site because it only makes a contribution to meeting the balance required. Indeed, there is every advantage in spreading the contribution between two or more sites as this will spread the responsibility for delivery. Certainly, Redrow Homes, having already undertaken a number of technical studies, are in a position to move rapidly towards the submission of a planning application in the event that the Council's longstanding resistance to a wider review of Green Belt is relaxed at least in piecemeal fashion here as it has been at Cribbs Causeway and Harry Stoke.
15. In conclusion, the validity of the Council's choice of site, on the north east outskirts of Thornbury, is fundamentally flawed insofar as it appears to be based on an assessment which fails to even consider any opportunity for more sustainable development in the Green Belt, contrary to Section 9 and Paragraph 83 of the NPPF.

# Hambrook - Site Location



Legend



Study Site