

PSM29/2

South Gloucestershire Core Strategy Examination

**Additional Hearing Session
7th March 2013**

**Council Response to Q2 of Inspector's
Supplementary Note 10th January 2013**

February 2013

Inspector's Question

Q2 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.

1.0 Background and Summary

1.1 The council, in its response to the Inspector's Preliminary Findings and Draft Main Modifications, in a letter dated 16 November 2012, strongly objected to Main Modification 15 which addressed Policy CS15 and the approach to housing numbers, including phasing and delivery. The council considers that the proposed replacement of the council's phased delivery with an annualised / equalisation approach, which has resulted in an increase in the housing target in the first five years of the plan to 9,345 dwellings/ 1870pa (including a 20% buffer) and created a housing shortfall in the first five years of 852 dwellings, is inappropriate in the context of the current market conditions and the objectively assessed housing need. The council is seeking a return to the phased approach to delivery and clearly set out the reasons for this in its response.

1.2 Notwithstanding the above fundamental objection, the council reviewed all sources of additional supply that it considered were capable of being delivered in the next five years, and concluded that some 594 dwellings are capable of being added to the available supply in the first 5 years from policy compliant sources. This would result in a total figure for the first five years of Policy CS15 of **9,087**. The council considers this is more than adequate to provide a first five year phase of housing supply including a **20%** buffer, when assessed against the council's preferred approach. The council therefore strongly recommended that a Main Modification to reflect this be incorporated into the Core Strategy.

1.3 The council went on to state that, if the Inspector was not persuaded by the council's proposed changes to Policy CS15 and still considered that the remaining shortfall of 260 units (when rounded up) must be addressed, then very reluctantly on the basis that there would be a further opportunity for legitimate public scrutiny and challenge through the forum of the EiP, it was prepared to identify land at Morton Way north, Thornbury as the next most sustainable site. This site would be capable of delivering the remaining 260 dwelling shortfall identified by the Inspector in the next five years.

1.4 Following consideration of the representations made to the draft Main Modifications the Inspector, in his note dated 10 January 2013, has now decided to hold an additional hearing day in order to consider housing provision and the ability of the council to provide a five year land supply. The Inspector also wishes, should he conclude that an additional site is necessary, to consider the merits of alternative

sites brought to his attention during the Examination compared to the Morton Way north site at Thornbury.

1.5 At the EiP last summer the council consistently maintained its position that the evidential case to justify the level of housing requirement contained in Policy CS15 has been adequately made (set out in Examination Library References EB21, PS8, PSM8 and CE7). On this basis the Council considers it has fully evidenced the housing need for the District and that, in establishing the minimum level of housing provision at 28,355 new homes, it is planning positively to fully meet the housing and development needs over the plan period while ensuring sufficient flexibility to respond to any change in circumstances.

1.6 Having reviewed the evidential base for objectively assessing housing need since the close of the EiP, the council continues to stand by the position, based on a demographic led projections basis, that there is need for 25,100 additional dwellings over the period 2006 – 2027 (Examination Library Ref: CE7). It is in this context that this paper goes on to respond to the Inspector's request in his Note of 10th January by restating the development/spatial strategy and to make it clear that this should be used as the basis for the allocation of any additional provision. Finally the paper sets out how alternative locations and sites have been appraised, resulting in the council's preferred option for Thornbury and Morton Way north, should the Inspector conclude that further land supply in the first five years of the plan period is needed.

2.0 Overall Strategic Housing Requirement

2.1 In objectively assessing and meeting housing need over the plan period, the Core Strategy is fully in accordance with NPPF, in particular, paragraphs 14, 16, 17 and 159. The council has produced a full set of household projections using the most up to date ONS population projections which cover the plan period (the ONS 2010-based SNPPs) and the household formation rates in the most up to date CLG household projections (the 2008 CLG household projections). This transparent approach is the standard methodology which underpins the CLG household projections and generates a projection of 25,100 new households over the Core Strategy plan period (2006-27) (Examination Library Ref: CE7).

2.2 In contrast the majority of developer participants simply rely on ONS 2008 based household projections (33,000 dwellings). The council has fully demonstrated that the ONS 2008 population and household projections were too high and have been superseded by more reliable and up to date information (set out in Examination Library References EB21, PS8, PSM8 and CE7).

2.3 Moreover, the council would like to remind the Inspector that Barton Wilmore's Chelmer Model produces a "demographic housing requirement" for 28,313 and an "economic led growth requirement" of 35,149 (Barton Wilmore statement to Matter 8 Representor ID number 3557665). The council's Chelmer Note (Examination Library Ref: CE7) explains in detail the council's objections to the Chelmer Model methodology and its conclusions.

2.4 In particular the council has set out its serious concerns over the methodology of Barton Willmore's "economic growth led housing requirement" which forms the basis for its justification for higher Core Strategy housing requirements (Examination Reference CS7 paras 19-25). By contrast, the Core Strategy's integrated approach to employment land, infrastructure provision and housing growth is based on objectively assessed evidence, high growth trend economic growth forecasts and is fully aligned with the LEP growth ambitions for the West of England set out in the 2012 City Deal (Examination Library Ref: CE19).

2.5 Since the close of the EIP in July 2012 we have reviewed the evidential base for objectively assessing housing need. Recently published data from the 2011 Census shows that, over the past decade, the population of the district has not increased at the rate predicted in ONS pre-census population estimates and projections, as confirmed in the note submitted by Pegasus Planning at the final EIP session (Examination Library Ref: RE37). Importantly this confirms that the 2008 CLG household projections overstate housing need for the district., a position the council strongly affirmed at the EiP, as set out in its evidence on justifying the housing need.

2.6 The council is also aware that there have been no updates to the CLG household projections since the EIP closed in July 2012. However, ONS has published the Interim 2011-based population projections. Having reviewed this new data source, the council considers that it has limited value in informing the strategic housing requirement, given the fact that it only has a ten year horizon (2011-21) due of the lower quality of data used.

2.7 There is, therefore, no evidential justification which would lead the Inspector to either revisit the issue of the overall housing provision beyond 28,355 or to find in favour of his earlier conclusion for the need for further provision in the first 5 years to meet government land supply targets.

2.8 The Inspector can therefore be assured that the council has fully evidenced and objectively assessed the need for 25,100 dwellings to 2027. Against this need the Core Strategy is proposing delivery of a minimum of 28,355 dwellings – increasing the overall housing stock within the district by c25% within the plan period. This adequately demonstrates that the council is planning positively and providing flexibility in accordance with NPPF paragraphs 14, 16 and 17. Furthermore, in responding positively to the Inspector's draft Main Modifications, the Core Strategy growth strategy, based on the council's preferred approach to deliver a further 594 dwellings from policy compliant sources, as set out in its response of 16th November 2012, is able to provide the market with the potential, allowing for the 20% NPPF buffer, to deliver annual building rates in excess of 1,800 dpa in the five years 2012 to 2017, exceeding the SGLP annual delivery rate of 1184dpa by some 600 pa (34%). The Core Strategy clearly makes provision for a significant boost in the housing supply as required by the NPPF at paragraph 47 and, as such, is fully compliant with the NPPF and the Government's growth agenda.

2.9 Notwithstanding the council's position on the overall housing requirement set out above, following receipt of the Inspector's Note dated 10 January 2013, the council welcomes the Inspector's confirmation that he has not yet concluded that another site is necessary to deliver on the shortfall of dwellings he has identified for the first five years of the Plan period. The council is also of the view that it is already providing housing sites which are capable of delivering in excess of the objectively assessed housing need, as set out above. Moreover, the council wishes to reiterate that it fundamentally objects to the annualised approach to determining the 5 year land supply identified in MM15 and the reasons for this are set out in the council letter dated 16 November 2012.

2.10 The remaining sections of this paper are the council's response to the Inspector's request that the council prepare a further paper explaining its reasons why it gives preference to Thornbury and, in particular, Morton Way north, as opposed to other locations, which have been drawn to his attention at the Examination.

3.0 The Core Strategy – Development/Spatial Strategy

3.1 The Inspector has indicated that he wishes to be assured any possible additional sites have coherence with the Plan's vision and spatial strategy. This section summarises the development/ spatial strategy and provides information on the council's justification of the strategy and the vision and strategic objectives underpinning it. This section of the paper also considers the Inspector's draft main modifications in respect to this aspect on the Core Strategy.

3.2 Paragraphs 4.1 -4.2 of the South Gloucestershire Core Strategy incorporating Post-submission Changes, December 2011 (Examination Library Ref: PS2) set out the vision and strategic objectives for how the district should develop over the plan period and beyond. Paragraphs 4.3 -4.29 explain the strategy for development which will achieve this vision and objectives. The strategy can be summarised as:

- New development being concentrated within the Bristol North Fringe recognising the economic importance of this area and the advantages to be gained by strengthening the interrelationship between workplace and homes, whilst retaining and strengthening the character and identity of existing communities and focusing development in areas where essential infrastructure is in place or planned. The strategy includes two new strategic site allocations in this locality, involving the release of 205.5 ha of land from the Green Belt.
- Within the Bristol East Fringe the main thrust is to complete the final phase of development at Emersons Green and to manage the delivery of smaller scale development elsewhere in the East Fringe, through development management and the Policies, Sites and Places DPD/ neighbourhood plans, so that it contributes to preserving the distinctive identity and heritage of existing communities, increases employment opportunities and the vitality of the high streets and improves environmental quality.
- At Yate and Chipping Sodbury the key is to put in place a long term strategy to continue to strengthen their role as successful and progressive market towns, to enhance residents' aspirations and change the perception that other people and businesses have of Yate. This will focus on; town centre investment, development of an evening economy, broadening the leisure and retail offer, and investment in public transport. It will be complemented by the planning and comprehensive delivery of a new neighbourhood in north Yate.
- The development strategy for Thornbury supports the objective of ensuring that it remains a successful and vibrant market town, with new development helping to address the demographic, economic and social issues that it currently faces.
- For villages within the rural areas the strategy is to focus on supporting existing services and limiting new housing, while supporting communities to deliver locally derived growth through the Policies Sites and Places DPD, and Neighbourhood Planning as appropriate.
- At Sevenside the development strategy recognises the significant issues with transport infrastructure, flooding, ecology/biodiversity and archaeology in the

area as well as the area's economic potential. It identifies a framework for unlocking this, whilst addressing and respecting the area's fragile and unique environment.

3.3 In assessing the overall spatial strategy, the South Gloucestershire Core Strategy Sustainability Appraisal Report December 2011 (Examination Library Ref: PS3) paragraphs 3.6-3.6c broadly appraised 5 different development strategy options for the district. On balance the SA appraised Option 5 – strong urban focus which concentrates development within and adjoining existing urban areas, including additional greenfield land, as the most sustainable option. This formed the basis for the December 2011 Core Strategy incorporating Post-Submission Changes (Examination Library Ref: PS2) and the Plan's overall vision and strategic objectives.

3.4 The council's Position Statement for Matter 7 (Examination Library Ref: PSM7), paragraphs 2.1 -2.13, justifies the Core Strategy's development strategy and identifies the reasons why alternative options for development in the Bristol East Fringe and a more dispersed strategy in the rural areas are not sustainable options. This Statement also reiterated the issues facing the Severnside area which include – transportation infrastructure, flooding, ecology/biodiversity and archaeology.

3.5 The council's Position Statement for Matter 8 (Examination Library Ref: PSM8), paragraphs 3.1- 3.3, again sets out the reasons why alternative development provision in the Bristol East Fringe and rural areas is not appropriate and, at paragraphs 2.1-2.4 of the Housing Distribution section of the Paper, sets out the justification for why the council's proposed development strategy is appropriate having regard to the character of the area, referring back to the Sustainability Appraisal Report to support this justification.

3.6 Having considered the Inspector's draft Main Modifications and noted the absence of modifications relating to the vision, spatial strategy and development strategy for the Core Strategy (apart from amendments to the end date for the Plan and consequential amendments to the overall figure for North Yate), the council concludes that the Inspector concurs with these aspects of the Core Strategy. In addition draft Main Modifications to Policy CS5 indicate to the council that the Inspector, having set the overall strategic housing requirement as a minimum of 28,355 up to 2027, has not considered it necessary to allocate additional sites in the Green Belt or in open countryside, preferring instead to enable non-strategic development to come forward through the Policies, Sites and Places Development Plan Document and/or Neighbourhood Planning.

3.7 In setting out this approach, the council also notes that the Inspector has indicated in his draft Main Modifications that there is no need for a further strategic Green Belt release. Instead, this should be addressed through a detailed review of Green Belt boundaries undertaken when the Core Strategy is reviewed and should ideally be undertaken in conjunction with the other West of England authorities. The council welcomes this approach and considers it strikes the right balance for meeting evidential need arising over the next 15 years, while supporting the council to work with the other unitary authorities in the West of England.

3.8 It is in this context, and also with regard to the fact that the Green Belt is afforded special protection by the NPPF, that the council considers that omission sites put forward by participants in Green Belt locations do not conform with the spatial/ development strategy of the Core Strategy. Notwithstanding this, the main omission sites, including those situated in the Green Belt, have been appraised in **Appendix A** and summarised in **section 5**.

4.0 Council's Response to the justification for the preferred additional allocation at Morton Way north, Thornbury.

4.1 The Inspector has indicated in his note of 10th January 2013, that omission sites, brought to his attention at the Examination, in the following locations should be assessed for their relative merits:

- Thornbury
- Yate/Chipping Sodbury
- Severnside
- East Fringe of Bristol
- North Fringe of Bristol

4.2 The Inspector has indicated that the factors to be considered, when comparing the relative merits of various sites at the above locations, should 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.

4.3 In preparing this paper the council has discounted a number of potential delivery solutions:

4.4 Sites that would accord with Policy CS5, for up to 30 dwellings:

Through the amendments to Policy CS5, as set out in the Inspector's draft Main Modifications, the Policies, Sites and Places DPD and/or neighbourhood planning provide the opportunity for local communities to support the bringing forward of sites of up to 30 dwellings. However, there is no assurance that these sites would be deliverable in the next 5 years and, therefore, this potential supply has not been considered as a means to address the issues set out in the Inspector's draft Main Modifications to Policy CS15.

4.5 **Small sites, less than 10 units in size:** Small sites comprising less than 10 units have been taken account of in the windfall allowance and, therefore, cannot be counted as contributing towards addressing any potential shortfall.

4.6 The Inspector's shortfall is in the next five years; not in the overall supply of housing. Therefore, if an additional allocation is to be made, it is necessary that it is capable of delivery in the next five years. The assessment has highlighted which sites the council considers to be deliverable in the next five years. To do this the definition of deliverability set out in footnote 11 to the NPPF has been used (Examination Library Ref: NP27).

4.7 Having set out the context and scope, this paper now reviews the consideration of alternative locations and main omission sites.

5.0 Consideration of Alternative Locations and Main Omission Sites

This section appraises alternative locations and the main omission sites within them. Detailed site appraisals are set out in Appendix A. For clarity, maps of these omission sites have been produced which visually illustrate and express the matters set out below.

Rural Areas:

5.1 Residential omission sites situated in the rural areas are considered unsustainable locations for further strategic development. Paragraphs 3.6 and 3.6a of the December 2011 SA Report (Examination Library ref: PS3) considered and dismissed a dispersed locational strategy. Development beyond that to support local communities in the rural areas is unsustainable and should therefore be dismissed as this would have a negative impact on sustainability by displacing growth away from higher order settlements. The council's position on development in the rural areas is set out in more detail in the council's Matter Statements PSM7, PSM8 and PSM25, which in summary find that:

- i. The Core Strategy's central vision for rural settlements is to (inter alia) conserve and enhance their unique character and open countryside settings and to recognise them as providing a valuable setting to the main urban areas.
- ii. In sustainability terms, proximity to the urban area is not in itself sufficient justification to compromise sustainable patterns and forms of development, when there are higher order settlements with better services and facilities which are capable of accommodating growth.
- iii. In rural areas services and facilities are very limited, public transport links to the Bristol urban area are modest and further development would reinforce village dormitory roles. This would perpetuate unsustainable patterns of development and would compromise the Core Strategy by displacing a scale and level of development which should be directed to more sustainable settlements. It would therefore be at odds with the vision and spatial strategy set out in the Core Strategy.
- iv. As set out in Matter Statement 25, the council has identified that in the rural areas new development is aimed at supporting local needs. Local people should have more control over what and where development is provided, new development should be proportionate in scale to rural settlements and the valued and unique aspects of the countryside and the historic environment should be protected and conserved. In accordance with the Localism Act and the NPPF, should local communities identify development needs – generally considered to be commensurate to what could reasonable be called 'infill' or logical settlement rounding, this can be brought forward either through the Policies, Sites and Places DPD or through neighbourhood development plans.

5.2 Although the Inspector has not included the rural areas in his locations to be considered, a position reinforced in the Sustainability Appraisal to the draft Main Modifications at section 4 (Findings of Appraisal), the council is of the opinion that

the Inspector should formally consider the suitability of allocating land at Woodlands Farm, Coalpit Heath and Engine Common Village. The council has for completeness included these sites in Appendix A of this paper and requests that the Inspector considers the suitability of these locations as part of his findings from this additional hearing session and in his final report. In summary:

- Land at Woodlands Farm, Coalpit Heath (respondent ID number: 1442945) is now the subject of a planning application submitted by Barton Willmore on behalf of Barratt Homes. If developed this site would have a significant impact on the rural village and would be contrary to the policies of the Core Strategy, in particular CS5 and CS34, as the development would be out of scale with the village, harmful to its character and exceed the 30 dwelling limit for this location under Policy CS5.
- Land at Engine Common (respondent ID number: 3245505), which if developed would have a significant impact on the rural village and would be contrary to the policies of the Core Strategy, in particular Policies CS5 and CS34, as the development would be out of scale with the village, harmful to its character and exceed the 30 dwellings limit for this location under Policy CS5. The site has been appraised under the Yate area below as it will have the effect of joining the two separate settlements. This is further set out at paragraph 5.21.

Sevenside:

5.3 The omission sites in the Sevenside area are not consistent with the spatial/development strategy. The sites are not well related to any of the main urban areas and are remote from the services and facilities needed to support either all, or a part, of the Inspector's identified shortfall. Moreover, the scale of the development required to address the shortfall is very unlikely to be able to support the delivery of the necessary increase in public transport to make this area sustainable.

5.4 In planning policy terms the area is covered by either safeguarded employment land or Green Belt. The majority of the area is covered by Flood Zones 2, 3a and 3b and, therefore, allocating residential development in this location would be contrary to paragraph 5 of the CLG publication: Technical Guidance to the National Planning Policy Framework (NPPF) (March 2012). This states that these flood zones should only be considered where there are no reasonably available sites in Flood Zone 1. Where land is available in Flood Zone 1 in this location it is constrained in other ways and the scale of the development needed to address the Inspector's shortfall would exceed the limit of 30 dwellings proposed for rural settlements in Policy CS5. Finally, as the council has appropriately demonstrated, there are alternative omission sites in other more sustainable locations that are available in areas of Flood Zone 1.

5.5 Notwithstanding this, residential development is being promoted by Barton Willmore on behalf of Harrow Estates (respondent ID number: 4604961) on the basis that, if funding from other sources were not forthcoming for improved infrastructure, residential development could be used to contribute towards it. However, the level of infrastructure investment that could be funded from all or some of the Inspector's identified shortfall would be in no way sufficient to address the infrastructure

requirements needed to support sustainable residential development at Severnside, as detailed in the Infrastructure Delivery Plan (IDP, Examination Library Ref: EB22/2),. These infrastructure requirements involve a new junction on the M49, and flood and ecological mitigation measures which are costed in the order of £84m (Examination Library ref: CE19) and far exceed what could be viably funded from allocating land for residential development. Moreover, it is not considered that this site can be classified as deliverable in the next five years due to the outstanding uncertainties around flooding and access. It is not considered appropriate to assess the omission site any further as it is not a suitable or deliverable alternative.

The North Fringe of Bristol:

5.6 The development strategy concentrates new development within the Bristol North Fringe. The Core Strategy proposes the allocation of two New Neighbourhoods in the North Fringe of Bristol, at Cribbs/Patchway and at land East of Harry Stoke. These sites represent the most sustainable locations for growth as set out in the South Gloucestershire Core Strategy Sustainability Appraisal Report December 2011 (Examination Library Ref: PS3) and PSM7, PSM8 and PSM22, which in summary finds that:

Cribbs/Patchway New Neighbourhood:

- This area is well related to a wide range of existing jobs and services, as well as retail opportunities around The Mall and has good public transport links to the rest of the Bristol North Fringe and Central Bristol.
- Redevelopment would create opportunities for a better mix between employment and residential uses and support the objective of providing an improved local centre around the Mall and retail areas at Cribbs Causeway for new and existing communities.
- Residential development would help to redress the imbalance between jobs and resident workforce in this area which is currently 2:1.
- The development of the airfield will remove a significant barrier to movement and access from the North Fringe. In combination with development to the west of the A4018 there exists greater critical mass of development to help ensure provision of sustainable transport infrastructure and community facilities to allow for the creation of a successful new community.
- The development of Filton Airfield would represent development of a brownfield site, lessening pressure for development on unsustainable greenfield sites elsewhere in the district.
- Development of Filton Airfield will need to ensure that there is no negative impact on employment provision.

East of Harry Stoke New Neighbourhood:

- This area is very well located in terms of access to a wide range and number of jobs, higher education and other services and facilities.
- There are good public transport links with central Bristol and to other key destinations.
- The area is directly linked to existing and proposed communities.
- Residential development in this area would help to improve the balance between jobs and resident workers in this area which is currently 2:1.
- Development here would contribute to public transport, walking and cycling improvements and the relief of congestion in Stoke Gifford, resulting from the delivery of the Stoke Gifford Transport Link.

5.7 To achieve these developments, in order to meet the objectively assessed housing need, the council has proposed to release land from the Green Belt in both these locations. The scale of the growth and the release of Green Belt already proposed in the Core Strategy sets the context for considering further strategic growth in this area. Non strategic growth will be allowed through infilling and through the mechanism of Policy CS5. PSM7 and PSM22 set out that the Core Strategy recognises the economic importance of this area both for the district and West of England. The Council considers that the Core Strategy has achieved the correct balance of land uses and it is not considered appropriate to allow further strategic residential development to take place in this location.

5.8 Furthermore no strategic omission sites for housing in the Bristol North Fringe were brought before the Inspector at the Examination that would be capable of addressing the shortfall. Therefore there are no reasonable alternatives in the Bristol North Fringe to the preferred site at Thornbury.

The East Fringe of Bristol:

5.9 The development strategy for the East Fringe is to deliver major new housing and employment development at Emersons Green in addition to infill within the urban area. The East Fringe of Bristol is considered an unsustainable location for further additional strategic growth for the reasons set out in PSM7, PSM8 and PSM28. The main thrust of these documents, and the reasons why strategic growth in this area is not appropriate, are set out in PSM7 at para 2.11. Which in summary finds that:

- Existing transport issues and lack of credible options to overcome these would lead to car based development exacerbating existing congestion on the Ring Road and on routes into central Bristol.
- Environmental constraints and landscape impact, affecting common land, public open space, and the open ridgelines which are important in views from

- Current level of self containment is only 34%, which is lower than the North Fringe of Bristol, Yate/Chipping Sodbury and Thornbury (Examination Library Ref: EB76). The 'employment density', which is the number of available jobs in an area versus the number of economically active residents of the same area, is again the lowest at 0.6, whereas the North Fringe of Bristol is 2.1, Yate is 0.8 and Thornbury is 0.9.
- Impact on valued character and distinctiveness of existing rural communities.
- Opportunities to successfully link to existing urban areas are limited by topography, the ring road and open spaces.
- Omission sites promoted in the Bristol East Fringe are situated in the Green Belt.

These issues were considered at some length at the EiP and in particular the lack of a credible and deliverable transportation strategy – as demonstrated by the justification for the Strategy for Housing – Appendix 1 (Examination Library Ref: EB21) and work by undertaken by Atkins (Examination Library Ref RD41).

5.10 The Inspector has supported the council's identified locations for strategic growth, at Emersons Green in the East Fringe of Bristol, in the two New Neighbourhoods in the North Fringe of Bristol, one New Neighbourhood at Yate/Chipping Sodbury and the housing opportunity area at Thornbury. In doing so he has not supported claims made by others for a further major strategic urban extension in the East Fringe of Bristol, seeing the assessment for the need for this as part of the review of the Core Strategy to be completed by 2021. Moreover, for non strategic sites the Inspector has made it clear that Policy CS5 as amended sets out the policy framework approach.

5.11 The omission sites promoted in the Bristol East Fringe are situated in the Green Belt. In the Strategic Green Belt Assessment (Examination Library ref: PS7) the council reviewed the Green Belt including considering which areas contribute to the 5 Green Belt purposes set out in the NPPF. The sites in the East Fringe contribute to all 5 purposes. This lends further weight to the omission sites not being taken forward given the high importance that the NPPF places on maintaining Green Belt and on other, more sustainable, sites being available to deliver the Plan's spatial strategy.

5.12 For the above reasons the council does not consider the Bristol East Fringe to be an appropriate location for further strategic housing growth.

5.13 The main omission sites in the East Fringe area are: Warmley Urban Extension (respondent ID number: 4012865), Cossham Street – Mangotsfield (respondent ID number: 4144449), Oldland Common Urban Extension (respondent ID number: 4020257) and Williams Close (respondent ID number: 3354113). These

sites have been appraised in detail at Appendix A. This appraisal shows that these sites are not as sustainable as the preferred site at Thornbury.

Yate/Chipping Sodbury

5.14 The spatial strategy directs strategic growth to Yate/Chipping Sodbury. The two adjoining towns have a range of facilities, services and employment opportunities that not only benefit their own communities but also those of the surrounding hinterland and villages that rely upon these important centres. As set out in PSM7 and PSM21, Yate/Chipping Sodbury functions as an integral part of the Bristol SSTC (Strategically Significant Town and City). Further, as demonstrated in EB76, Yate/Chipping Sodbury is a more self-contained area than the Bristol East Fringe, having a higher proportion of employed residents working in the area (44% compared to 34%) (Examination Library Ref: EB76) – it therefore performs well as a location to direct strategic growth to. The Core Strategy's main element of strategic growth is a New Neighbourhood consisting of 3,000 dwellings, with up to 9 ha of employment and community facilities, to be built in the north of Yate.

5.15 Through the preparation of the Core Strategy, a number of other locations around Yate/Chipping Sodbury were also considered as possible sites for strategic development. In undertaking this exercise, options at Engine Common and at land east of Chipping Sodbury were also appraised alongside north Yate. The reasons why north Yate area was selected ahead of other alternative sites is set out in paragraph 4.32 of the Sustainability Appraisal (Examination Library Ref: PS3). The main reasons why north Yate was selected were also summarised in paragraph 2.7 of PSM21 and are:

- Existing area has a limited number of constraints to development.
- Potential to provide a critical mass of housing to ensure the delivery of a comprehensively planned development with a mix of uses, facilities and services that will support the new development and also the existing community.
- Potential to create a sense of place, connecting with the existing communities of Yate and Chipping Sodbury and bringing benefits to the existing settlement but without compromising the valued landscape and community of Yate Rocks.
- The scale of the employment land capable of being delivered can offer a choice of types of job of the kind needed in Yate and Chipping Sodbury.
- Provision of public transport improvements to the whole of North Yate community, not just new neighbourhood.
- Potential for the provision of links from new neighbourhood to Chipping Sodbury.
- Limited negative impact on the existing community.

- The area is physically and visually contained, with potential to support and enhance natural assets and landscape features.
- Delivery of housing can begin at North Brimsham in advance of essential improvements to the local and downstream sewerage system.
- Provide the opportunity to create a new link through Peg Hill to deliver connectivity and a sense of one whole community by linking the new and the existing communities.

5.16 As set out in PSM21 (paras 2.8 – 2.16), the north Yate area provides the best strategy to achieve integration with the existing town and community, and provides the necessary critical mass to ensure that a full range of new services and facilities can be delivered.

5.17 Moreover, the New Neighbourhood is complemented by other policy compliant development sites, which in combination will deliver 3,850 dwelling in total in the lifetime of the Core Strategy. A number of these sites have either been built out or are currently under construction.

5.18 At the 2011 Census the population of Yate / Chipping Sodbury was **33,980** a decrease of 549 (-1.6%) on the 2001 Census (34,529).

5.19 Development of 3,850 dwellings is likely to result in a population increase of approximately 9,240 people, using 2.4 people as the average household size from the 2011 Census for South Gloucestershire. Therefore, developments in Yate and Chipping Sodbury will result in an approximate 27.2% increase in the towns' population.

5.20 The Core Strategy, therefore, currently proposes a significant expansion at Yate and Chipping Sodbury, amounting to an annual average of 240 dwellings from 2012 to 2027. This is far in excess of the level of growth that the area has experienced in the last 10 years, where fewer than 37 units per annum on average have been completed. It would, therefore, be inappropriate to pursue even further growth in this area.

5.21 In selecting north Yate the council fully considered alternative locations at Engine Common village and also East of Chipping Sodbury. These locations were affirmed as unacceptable, in addition to the above considerations, because in summary:

Strategic growth centred on Engine Common Village would result in:

- Joining the separate rural village of Engine Common to Yate, having a suburbanising effect on Engine Common, which would be harmful to the character of the village and therefore contrary to the emerging Policies CS5 and CS34. The character, function and form of Engine Common, a linear village, and its setting, formed by the adjoining countryside, would be detrimentally affected by development.

- Policy CS5 sets out a maximum amount of growth for this location as being 30 dwellings, where there is support from the local community. The development of the omission site would exceed this limit and would increase the number of dwellings at Engine Common from 107 to 317, or by 196%. This would be out of scale with the non-strategic growth envisaged for this area by the Core Strategy emerging Policy CS5.

Strategic growth centred on land east of Chipping Sodbury would result in:

- Development would impact on the expansive open views to and from the Cotswold AONB, which is elevated above the site and would invade the currently well established rural area beyond the urban edge formed by St Johns Way.
- Development would impact on the tranquillity of Sodbury Common. Introducing landscape buffering would also bring a greater degree of enclosure and physical intrusion into an expansive rural landscape of open commons and fields.
- Development of this site for large scale housing would cause harm to the settings of the surrounding listed buildings. Development of this site would conflict with the NPPF and Policy L13 of the South Gloucestershire Local Plan.
- Development would be located the furthest from Yate train station and main employment areas in Yate; this would lead to a car based form of development.
- A site that would be extremely difficult to assimilate with the existing settlement pattern. The site is separated from the existing built form of the town by St Johns Way road, a Primary Distributor Road and the River Frome and areas of flood risk. There are two existing footbridges crossing the river, which offer a degree of pedestrian access. The only way that access could be provided is by two new road bridges. This would involve crossing a continuous area of public open space alongside the River Frome, the long distance footpaths known as Monarchs Way and Frome Valley Walkway and the River Frome. The severance cause by these two new road accesses would detrimentally affect the continuity and open aspect of the public open space, impact on the rural experience and rural views from these long distance footpaths. These two crossings may also have adverse effects on the nature conservation interest of the SNCI along the River Frome.

5.22 There are two main omission sites in the Yate/Chipping Sodbury area, at Engine Common (respondent ID number: 3245505) and at land east of Chipping Sodbury (respondent ID number: 6022017). These sites have been appraised in detail at Appendix A. This appraisal shows that these sites are not as sustainable as the preferred site at Thornbury.

Thornbury

5.23 The development strategy for Thornbury supports the objective of ensuring that it remains a successful and vibrant market town and new development helps to address the demographic, economic and social issues that it currently faces.

5.24 In preparing the Core Strategy the council recognised that a number of challenges are facing Thornbury, including falling primary school rolls and high town centre shop vacancies. Thornbury is a market town, which supports the surrounding hinterland and villages that rely upon it. It is well served by services but some would benefit from an increase in patronage, which could be achieved in part by supporting the town to grow.

5.25 In order to support the emerging Core Strategy's objectives for Thornbury, provision is made for up to 500 dwellings to be delivered at Park Farm, to the north of Thornbury. During the previous EiP hearing sessions the council successfully demonstrated that the Park Farm site is the most sustainable site on the edge of Thornbury. There are also further developments that will take place within the settlement boundaries of the town, which in combination with Park Farm amount to 802 new dwellings to be constructed over the Core Strategy plan period.

5.26 Development of 802 dwellings at Thornbury is likely to result in a population increase of approximately 1,925 people, using 2.4 people as the average household size based on the 2011 Census for South Gloucestershire.

5.27 Thornbury is a market town with a number of services, facilities and employment opportunities making it a sustainable location for further growth. It continues to function as a market town and tourist destination, and supports a rural hinterland; consequentially it is substantially more sustainable than other rural settlements.

5.28 New evidence published since the summer hearings of the EiP, from the 2011 Census, indicates that the population of Thornbury is **12,063**. This was a decrease of 279 people (-2.3%) on the 2001 Census (12,342), and a decrease of 554 people (-4.4%) on the 1991 Census (12,617). (Examination Library Ref: SG27), Although based on the ONS 2010 mid-year estimates the council had predicted a slight increase in population from 2001 to 2010, estimating a population of 12,431. The 2011 Census results have proved this to be incorrect, and instead demonstrate that there has been a drop in Thornbury's population, against the predicted rise, further reinforcing the council's justification for the need for further housing at Thornbury.

5.30 The Thornbury chapter of the Core Strategy was subject to a full hearing day during the Examination in Public in July 2012. Following the hearing session, the Inspector's preliminary findings indicate that he considers the identification of Park Farm to be sound and the reasons for it are fully justified. The council issued a resolution to grant permission for development at Park Farm in October 2012, subject to the signing of a S.106 agreement. This paper does not look to re-examine the allocation of the Park Farm site, however, we would remind the Inspector that in justifying the allocation of this site the council undertook a sustainability appraisal (SA) of six greenfield site options, as set out on page 315 of Core Strategy

Sustainability Appraisal Report December 2011 (Examination Library Ref: PS3), for development around Thornbury. The Park Farm site was considered to be the most appropriate site to allocate in the context of the need to deliver 500 dwellings. The identification of the land at Morton Way north as the council's preferred site does not alter that. The appraisal of the options is detailed at pages 48 to 68 and Appendices 10 and 11 of the Core Strategy Sustainability Appraisal Report December 2011 (Examination Library Ref: PS3).

5.31 Based on evidence submitted to the examination the council considers 3 options remain relevant:

Morton Way north – option 1 in the December 2011 SA
Morton Way south - option 3 in the December 2011 SA
Bristol Road – option 4 in the December 2011 SA

5.32 Option 6, Park Farm was identified as the most sustainable site, as set out above. Options 2 and 5 have not been the subject of duly made representations to the Core Strategy.

5.33 Option 4 (Bristol Road) is situated within the Green Belt, which the NPPF places great weight upon protecting; therefore the council does not consider this to be a suitable location for development. In any case the capacity of Option 4 is limited (likely to be around 80-100 dwellings), therefore it would not, on its own, be capable of addressing the shortfall identified by the Inspector. On this basis this site has not been considered in Appendix A. This therefore leaves Option 1 (Morton Way north, respondent ID number: 4012737) and Option 3 (Morton Way south, respondent ID number: 4038145) as the next two potentially most sustainable, suitable and deliverable (within the next 5 years) sites for development. These two sites are considered in Appendix A. and in more detail below.

Morton Way north

5.34 Land at Morton Way north is split into two main land ownerships – that promoted by Bloor Homes (respondent ID number: 4012737) fronting Morton Way and Fearson Homes (respondent ID number: 2819841) fronting Old Gloucester Road. The former is subject to a current planning application for up to 300 dwellings which has yet to be determined by the council, which in turn is the subject of an appeal for non-determination. PINS have scheduled the appeal hearing for April.

5.35 While the Fearson Homes land has been promoted through the Core Strategy's preparation, limited information is available in submitted representations as to the potential capacity of the site. The representations indicate a total of approximately 290-310 dwellings could be delivered on that site, although further testing would be required. This site is not considered to be deliverable in the next five years and would, on its own, be entirely separate from the current built form of Thornbury, as it is located to the east of the land being promoted by Bloor Homes and requires the build out of the Bloor's scheme to achieve connection to the built

edge (see map 8) It is not considered appropriate to consider this site further and therefore it has not been considered in Appendix A.

Morton Way south

5.36 Morton Way south has been promoted through the Core Strategy's preparation by Welbeck Strategic Land and Landform Estates (respondent ID number 4038145). The representations indicate a capacity of approximately 500 dwellings. Although this capacity is considered very ambitious, it is considered capable of delivering the necessary dwellings (260) to address the outstanding shortfall as an alternative to Morton Way north. The basis for the council's preference for Morton Way north is set out below.

Land for development suggested by the Council

5.37 The appraisal set out in Appendix A indicates that there is little difference between the two Morton Way sites. However, on balance the council considers that the Bloor Land at Morton Way north is the more sustainable of the two. In coming to this conclusion the council considers that Morton Way south performs less well in relation to ecological constraints because of the proximity of two ancient woodlands, designated as Sites of Nature Conservation Interest (SNCI), to the development site. In addition the development would disrupt and sever the valuable hedgerow network that provides wildlife links between these two SNCIs. The council has given greater weight to this constraint because adverse impacts on ancient woodland cannot be easily mitigated, it cannot be relocated and is irreplaceable.

5.38 The Morton Way north site is capable of creating a small country park, which would link with the existing streamside walk. If suitable access is created this would enable this new area of public open space to serve both the residents of the new development and the existing community, benefitting the integration of the new development. As set out in the Core Strategy Sustainability Appraisal Report December 2011 (Examination Library Ref: PS3) very strong mitigation measures are needed to ensure pedestrian, cycle and public transport links overcome the separation caused by Morton Way. These measures include, inter alia, improved signage, lighting and legibility of routes, crossing points, cycle links and public transport.

5.39 The Bloor Land at Morton Way north – notwithstanding the council's and local communities' in principle objection about development east of Morton Way, as set out at the Examination last summer, has no overriding constraints. The council recognises that the Inspector wishes to consider deliverability in his consideration of alternative omission sites. The submission of a planning application for residential development demonstrates a commitment from a developer/landowner to pursuing the delivery of the site.

5.40 For the above reasons the council has concluded that the omission site at Morton Way north, Thornbury, as promoted by Bloor Homes, is the next most appropriate to address the Inspector's shortfall. Whilst Morton Way north is not

currently allocated in the Core Strategy, Thornbury is identified as an area where further growth will promote greater self containment and enable the town to fulfil its vision and objectives, as set out in paragraph 3.24 of the Core Strategy Sustainability Appraisal Report December 2011 (Examination Library Ref: PS3). This site could contribute to this objective. For the reasons set out above, the council considers that Thornbury is the most sustainable location to accommodate further strategic growth after the Bristol urban areas and Yate/Chipping Sodbury.

6.0 Conclusion

6.1 The council remains of the view for the reasons set out in this paper, and in its response to the draft Main Modifications, that there is no need for any additional provision of housing over and above that set out in Policy CS15 as presented to the EiP (Examination Library Ref: SRC3). However, should the Inspector determine that there is a need for additional housing provision in the first 5 years to meet government land supply targets, the council considers it has set out a credible and justified approach as detailed in its letter of 16th November 2012.

6.2 In setting out this case, the council has explained to the Inspector how it has sought to compare the relative merits of various sites at a number of locations including Thornbury, Yate/Chipping Sodbury, Severnside and the East and North Fringes, which in summary finds that:

6.3 Strategic development in the **rural areas** is unsustainable. If more strategic growth is needed beyond the provisions of Policy CS5 it should be directed to higher order settlements where there are concentrations of services and facilities, and employment opportunities. Dispersed development beyond the scale required by Policy CS5 in the rural areas would be contrary to the Core Strategy's vision and spatial strategy.

6.4 Strategic residential development at **Severnside** would be contrary to the Core Strategy's vision and spatial strategy. The level of infrastructure investment that could be funded would be in no way sufficient to address the infrastructure requirements needed to support sustainable residential development at Severnside

6.5 The plan is right to focus strategic growth in the **Bristol North Fringe** and release two areas of land from the Green Belt to accommodate this growth, because this area has a concentration of employment opportunities, services and facilities. However there are no strategic residential omission sites in the Bristol North Fringe and the council considers that the balance of land uses as proposed in the Core Strategy and the protection of remaining parts of the Green Belt is correct and sustainable.

6.6 Further strategic growth in the **Bristol East Fringe** is not considered appropriate because there is already a strategic allocation at Emersons Green. The current level of self containment as set out in EB76 is less than alternative locations (including Yate/Chipping Sodbury and Thornbury) and there is a current lack of any major transport scheme to address existing public transport inadequacies. All omission sites are located within the Green Belt, which is given high importance in the NPPF.

6.7 The Core Strategy allocates a strategic amount of growth to **Yate/Chipping Sodbury** area. This is fully meeting the housing needs of this locality and no further greenfield allocations are needed. The council therefore considers that the omission sites at Engine Common and land east of Chipping Sodbury are not appropriate for further strategic residential growth in this plan period. Moreover, such growth at Engine Common is contrary to Policy CS5, which seeks to limit the scale and impact of growth on rural settlements and was considered and rejected through the

development of the Core Strategy. It is also considered to have significant harm to the separate identity and character of the village. Land east of Chipping Sodbury has numerous constraints which significantly impact on the site's deliverability and, consequently, make it unlikely that it could be delivered within the next 5 years of the Core Strategy.

6.8 Should it be necessary to identify a further site for strategic residential development to accommodate the Inspector's shortfall then, for the above reasons, this development should be directed to Thornbury, which is the next appropriate settlement in the hierarchy. Having appraised the site options at Thornbury the council considers, on balance, that the most sustainable site is at Morton Way north. The Inspector is respectfully asked, for the reasons set out in this paper, to take these matters fully into consideration.

THIS PAGE IS INTENTIONALLY LEFT BLANK

Appendix A: Comparative Appraisal of sites

Please note that site capacity comments relate to addressing the remaining shortfall of 260 dwellings. This schedule should also be read alongside the supporting Map Compendium.

Site	Commentary
Rural Areas	
<p data-bbox="188 474 403 598">Woodlands, Coalpit Heath (Site map 1)</p> <p data-bbox="188 671 385 730">Site Capacity: 380</p> <p data-bbox="188 804 369 938">EiP Documents: PSM7, PSM8 and PSM25</p> <p data-bbox="188 1011 371 1209">Previous EiP Hearing Session: Day 10, Thursday 12th July</p>	<p data-bbox="425 474 2027 639">Coherence with the Plan’s Vision and Spatial Strategy: Coalpit Heath is a rural settlement, with a population of 1923 (2011 Census) and 808 dwellings. The Core Strategy directs strategic growth to higher level settlements. In accordance with this strategy Thornbury performs as a more sustainable location than Coalpit Heath. Thornbury has a broader range of services and facilities and functions as a market town with a hinterland. This development fails to accord with the spatial strategy and the Inspector’s draft Main Modifications.</p> <p data-bbox="425 676 2027 775">Any potential development at Coalpit Heath falls to be considered against Policies CS5 and CS34. The scale of the development required to address the shortfall does not confirm with the policy requirements of CS5, which permits up to 30 dwellings to be built when supported by the local community.</p> <p data-bbox="425 812 2045 879">Policy CS34 states at para 3, that the unique and valuable setting provided by the rural areas to settlements, such as Coalpit Heath, will be protected.</p> <p data-bbox="425 916 2027 1150">There is no traditional high street and the limited facilities are widely distributed across the distinct communities of Winterbourne, Frampton Cotterell and Coalpit Heath – which are recognised as three separate villages. The nearest site for leisure facilities is on a dual use site, at the Ridings International Academy in the separate settlement of Winterbourne, and therefore has limited public accessibility. The main urban area and the three market towns (Chipping Sodbury, Yate and Thornbury) are of a higher level in the retail hierarchy, offering a greater range of goods, facilities and services. In addition the market towns serve a wide hinterland. Thornbury has more employment and a greater range of job opportunities, than Coalpit Heath, which is primarily a dormitory settlement.</p> <p data-bbox="425 1187 2027 1286">Site Capacity: The capacity of this site is 380 dwellings. This development would therefore increase the dwelling stock by 47% (from 808 dwellings to 1188 dwellings).</p> <p data-bbox="425 1323 2045 1383">Deliverability: The council has registered a planning application (PT13/0028/O) and considers that the submission of a planning application</p>

for residential development demonstrates a commitment from a developer/landowner to pursue the delivery of the site. However this is considered to carry no weight given the in principle policy objections and conflict with the Plan's Strategy.

Constraints:

The site is classified as being in the countryside and the council considers this makes an important contribution to defining and contributing to the urban edge. This view was shared by the appeal Inspector in relation to the adjacent land, known as Windmill Green (also known as land adjacent to Park Farm or Meads), which was granted permission, via an appeal (appeal ref: APP/P0119/A/09/2105293, for residential development. The Inspector in deciding the appeal noted the following:

*"10. From my assessment of the evidence and from the site visit I consider that the ridge line at the western boundary of the site with Park Lane separates the site from the Frome Valley to the west and that the dry valley lies mostly to the south, with its head terminating a few metres north of the pond at the southeastern corner of the site. Thus whilst the site is physically part of the landscape character area I do not consider that it strongly displays its distinctive features. Nor would the proposed development impact significantly on the **distinctive dry valley character feature of the area.***

*11. Furthermore, the site's character is heavily influenced by the adjoining residential development adjacent to its western, northern and eastern boundaries, and by the degrading feature of the small tipped area in the northwestern corner. **In my opinion it does not have the remote/tranquil character that is typical of the wider landscape character area.** Whilst it is pleasant in appearance I consider that it has a **weak landscape structure and a semi-rural character, unlike the agricultural land to the south, where the dry valley form is clearly visible and the land is rural in character.** Although the Forest Plan for the area identifies the Frome Valley generally as being an area of high landscape quality, in my opinion, this peripheral part is not distinctive and is of only low/ordinary landscape value.*

*12. The site is visually contained by the hedgerows containing mature TPO protected trees which bound it, and by one separating its two component fields. This mature vegetation limits viewpoints into the site and to the wider countryside to the south. I consider that the site forms a natural infill site at the urban edge of Frampton Cotterell. The proposed development would shift, but rationalise the southern built boundary of this part of the settlement, extending it from the southern edge of the Park Farm housing development to the east, to residential development in Park Lane to the west. The proposed development would not lead to the coalescence of settlements referred to by the Member of Parliament for the area. In my opinion the **southern hedgerow boundary of the site and the more complex form of the landscape to the south provide a clear, natural edge to built development in this part of Frampton Cotterell.**"(Council's emphasis)*

The council agrees with the appeal Inspector's conclusions. In summary although the Inspector allowed the Meads site, as a rounding off of the existing settlement, she had strong reservations regarding any further expansion of Coalpit Heath in this locality, because of the detrimental affect on wider area which is now the subject of this omission site for the which in summary relates to:

- the distinctive dry valley character feature;
- its remote/tranquil character;
- its rural character; and
- the complex form of landscape which provides a clear natural edge to the built development in this area.

Insufficient archaeological work has been undertaken within this area, documentary sources indicate that there is high potential for the survival of seventeenth century coal mining activity on the site; such remains could be of national importance which could preclude development from parts of the site.

The site adjoins Blackberry Brake SNCI. There is concern over the presence of pair of breeding barn owls on the site.

Access to a higher range of facilities, services, education, retail and a greater range of employment opportunities is beyond the recommended distance for cycling and walking, when assessed using the *Building Sustainable Transport into New Developments* and *the National Travel Survey 2011*; DFT.

Assimilation into existing settlement pattern:

As noted above in the 'Constraints' section the development of this omission site would impact on the existing settlement's rural setting, because it would result in the loss of the distinctive dry valley, the remote/tranquil character of the area and its rural character. In addition as the appeal Inspector noted the southern boundary of the Meads site provides a clear, natural edge to built development.

Overall Conclusion

The council has carefully assessed the sustainability merits of this site. In applying the planning balance as a result of concerns with the lack of coherence with the Plan's vision and spatial strategy (including access to facilities, services, education, retail and employment opportunities), impact on the landscape and the inability to be appropriately assimilated into the existing settlement pattern, it has not considered this site performs better than its preferred location at Thornbury, Morton Way north. Land at Woodlands, Coalpit Heath has therefore been rejected.

<p>Bristol East Fringe</p>	
<p><u>Warmley Urban Extension</u> (Site map 2)</p> <p>Site Capacity: 2,500</p> <p>EiP Documents: PSM7, PSM8 and PSM28</p> <p>PSM6</p> <p>PS7</p> <p>Previous EiP Hearing Session: Day1, Tuesday 19th June (Green Belt)</p> <p>Day 12, Tuesday 17th July</p>	<p>Coherence with the Plan’s Vision and Spatial Strategy: Warmley Urban Extension is located in area that does not accord with the spatial strategy as set out in the Core Strategy.</p> <p>The Inspector has not considered it appropriate to pursue additional strategic scale development in the Bristol East Fringe. This development fails to accord with the spatial strategy.</p> <p>Development here would require in a large scale release of the Green Belt, this would be inconsistent with the Inspector’s Preliminary Findings, where he concludes that this should be undertaken at the time of the CS review to be completed by 2021, and in combination with the other West of England Unitary Authorities.</p> <p>Site Capacity: The capacity of this site of approximately 2,500 dwellings.</p> <p>Deliverability: There is no planning application registered for the site. This would be a major urban extension and it is therefore considered unlikely that given the lead in times for such developments, this development could be considered viable in accordance with the requirements of footnote 11 of the NPPF and deliver the Inspector’s shortfall within the 5 year time period.</p> <p>Constraints The site is located in the Green Belt, which is afforded special protection by the NPPF (paragraph 79). Any development in this area would be urban sprawl and would encroach on the open countryside and would be perceived in this way from the existing urban area. Currently the Green Belt boundary is defined by the Dramway, the Ring Road, the A420 and the A4175, which are considered to be physical features easily recognised and likely to be permanent, in accordance with paragraph 85 of the NPPF. New development in this location would require the creation of a new boundary at the edge of the development which in our view would lack permanence and would not form a readily recognisable strong and clear boundary.</p> <p>Flooding: There are areas of the Flood Zone 3b and 2 identified in the South Gloucestershire SFRA Level 1 Report. However the SFRA Level 2 Report did not address this area and no Flood Risk Assessments have been prepared.</p> <p>Landscape: This area is a locally valued rural landscape with a high density of recreational land, which is underprovided in</p>

the Bristol East Fringe urban area, including Siston Common (SNCI), Bridgeyate Common (SNCI), Webbs Heath Common (SNCI), Warmley Forest Park (SNCI), Overscourt Wood and long and short distance footpaths. Urban development would result in significant impact on the valued rural setting and character of these areas, some of which could become enclosed by development. In addition many important and valued open rural views out of the existing urban area would be lost.

The development of this site has potential to adversely impact on the setting of the Siston Conservation Area.

Transport: Significant transport issues associated with distance to major centres of jobs and facilities in central Bristol, the Bristol North Fringe and congestion on key routes. There is a lack of a credible and deliverable transportation strategy and/or transport major scheme bid deliverable within the next 5 years, which would ameliorate these issues, as demonstrated by the justification for the Strategy for Housing – Appendix 1 (Examination Library Ref: EB21) and work by undertaken by Atkins (Examination Library Ref: RD41). Moreover, what capacity there might be in the network has been shown by Atkins to be insufficient to support this scale of development. The area has no heavy rail option and bus based measures are more limited Therefore further development in this location would perpetuate the existing car borne commuting patterns exacerbating existing congestion on the Ring Road and on heavily trafficated routes into central Bristol and consequently would be unsustainable.

Employment: Job worker ratio is very poor in this area and further housing would exacerbate this and further perpetuate car borne commuting out of the area. As demonstrated in EB76, of the four policy areas of, the Bristol East Fringe, the Bristol North Fringe, Yate/Sodbury and Thornbury, the Bristol East Fringe has the lowest employment density (0.6) and the lowest level of self containment (34%).

Assimilation into existing settlement pattern:

This site would be a separate strategic new neighbourhood, divided from the existing built form to the west by the Avon Ring Road, which is a dual carriageway. Opportunities to successfully link to existing urban areas are limited by topography, the ring road and open spaces (including areas of Common land).

Overall Conclusion

The council has carefully assessed the sustainability merits of this site. In applying the planning balance as a result of concerns with the lack of coherence with the Plan's vision and spatial strategy, impact on the landscape, impact on the Green Belt, impact on areas of Common and public open space, the limited employment opportunities in the locality, the lack of sustainable transport options and the inability to be appropriately assimilated into the existing settlement pattern, it has not considered this site performs better than its preferred location at Thornbury, Morton Way north. The Warmley Urban Extension has therefore been rejected.

<p>Cossham Street (Site map 3)</p> <p>Site Capacity: 180</p> <p>EiP Documents: PSM7, PSM8 and PSM28</p> <p>PSM6</p> <p>PS7</p> <p>Previous EiP Hearing Session:</p> <p>Day 1, Tuesday 19th June (Green Belt)</p> <p>Day 12, Tuesday 17th July</p>	<p>Coherence with the Plan’s Vision and Spatial Strategy: Cossham Street is located in area that does not accord with the spatial strategy as set out in the Core Strategy.</p> <p>The Inspector has not considered it appropriate to pursue additional strategic scale development in the Bristol East Fringe. This development fails to accord with the spatial strategy.</p> <p>Development here would require the release of the Green Belt. This would be inconsistent with the Inspector’s Preliminary Findings, where he concludes that this should be undertaken at the time of the CS review, 2021, and in combination with the other West of England Unitary Authorities.</p> <p>Site Capacity: The site has capacity for 180 dwellings and therefore fails to address the entire shortfall identified by the Inspector.</p> <p>Deliverability: There is no planning application and we do not know if the site is viable in accordance with the requirements of footnote 11 of the NPPF. However, there was previously an application in 2009 which was refused. The subsequent appeal was withdrawn the following year.</p> <p>Constraints The site is located in the Green Belt, which is afforded special protection by the NPPF paragraph 79. Although the site is cut off from the main of Green Belt land by the Ring Road the land together with adjoining land checks the unrestricted sprawl of the built-up area, and assists in maintaining the separate identities of Bristol and Shortwood.</p> <p>The site forms part of a wider area of undeveloped land and important open recreational space, including Rodway Common (SNCI), Pomphery Hill Playing fields and Charn Hill (SNCI). Together these areas provide valued open views within and out from the urban area towards the east.</p> <p>Transport: Significant transport issues associated with distance to major centres of jobs and facilities in central Bristol, the Bristol North Fringe and congestion on key routes. There is a lack of a credible and deliverable transportation strategy and/or transport major scheme bid deliverable within the next 5 years, which would ameliorate these issues, as demonstrated by the justification for the Strategy for Housing – Appendix 1 (Examination Library Ref: EB21) and work by undertaken by Atkins (Examination Library Ref: RD41). Moreover, what capacity there might be in the network has been shown by Atkins to insufficient to support this scale of development. The area has no heavy rail option and bus based measures are more limited Therefore further development in this location would perpetuate the existing car borne</p>
---	--

commuting patterns exacerbating existing congestion on the Ring Road and on heavily trafficated routes into central Bristol and consequently would be unsustainable.

Employment: Job worker ratio is very poor in this area and further housing would exacerbate this and further perpetuate car borne commuting out of the area. As demonstrated in EB76, of the four policy areas of, the Bristol East Fringe, the Bristol North Fringe, Yate/Sodbury and Thornbury, the Bristol East Fringe has the lowest employment density (0.6) and the lowest level of self containment (34%).

Assimilation into existing settlement pattern:

The development of this site would impact on the purposes of the Green Belt. It forms part of a wider area of undeveloped open land. The council concurs with the South Gloucestershire Local Plan Inspector (Inspector's report LR11 Page 93 -94) who found that:

“Although the land is physically cut off from the main body of green belt land to the east by the Ring Road, I have no doubt that it performs a number of green belt purposes, including checking the unrestricted sprawl of the built-up area, assisting in maintaining the separate identities of Bristol and Shortwood and assisting in urban regeneration.”

In addition the inspector stated that the site is open in character and affords views across to the east. Although separated from other agricultural land, it continues to perform a green belt function.”

Overall Conclusion

The council has carefully assessed the sustainability merits of this site. In applying the planning balance as a result of concerns with the lack of coherence with the Plan's vision and spatial strategy, impact on the continuity of this area as part of a larger area of undeveloped land, impact on the Green Belt, the limited employment opportunities in the locality, the lack of sustainable transport options and the inability to be appropriately assimilated into the existing settlement pattern, it has not considered this site performs better than its preferred location at Thornbury, Morton Way north. Land at Cossham Street has therefore been rejected.

<p><u>Oldland Common Urban Extension</u> (Site map 4)</p> <p>Site Capacity: 500</p> <p>EiP Documents: PSM7, PSM8 and PSM28</p> <p>PSM6</p> <p>PS7</p> <p>Previous EiP Hearing Session: Day 1, Tuesday 19th June (Green Belt)</p> <p>Day 12, Tuesday 17th July</p>	<p>Coherence with the Plan’s Vision and Spatial Strategy: Oldland Common is located in area that does not accord with the spatial strategy as set out in the Core Strategy.</p> <p>The Inspector has not considered it appropriate to pursue additional strategic scale development in the Bristol East Fringe. This development fails to accord with the spatial strategy.</p> <p>Development here would require in a large scale release of the Green Belt, this would be inconsistent with the Inspector’s Preliminary Findings, where he concludes that this should be undertaken at the time of the CS review, 2021, and in combination with the other West of England Unitary Authorities.</p> <p>Site Capacity: The capacity of this site is 500 dwellings.</p> <p>Deliverability: There is currently no planning application and we do not know if the site is viable in accordance with the requirements of footnote 11 of the NPPF. However, there was previously an application in 2009 which was refused. The subsequent appeal was withdrawn.</p> <p>Constraints: The site is located in the Green Belt, which is afforded special protection by the NPPF, paragraph 79.</p> <p>Landscape: The site has a strong rural character despite the closeness of the urban edge and this is reinforced by the views which extend out from the site to the surrounding ridgeline and which dominates views from the road and footpaths. Development of this site would result in loss of rural views from the urban edge, the change in character of the site from agricultural to urban and the reduction in the amenity value of the footpaths.</p> <p>Transport: Significant transport issues associated with distance to major centres of jobs and facilities in central Bristol, the Bristol North Fringe and congestion on key routes. There is a lack of a credible and deliverable transportation strategy and/or transport major scheme bid deliverable within the next 5 years, which would ameliorate these issues, as demonstrated by the justification for the Strategy for Housing – Appendix 1 (Examination Library Ref: EB21) and work by undertaken by Atkins (Examination Library Ref: RD41). Moreover, what capacity there might be in the network has been shown by Atkins to insufficient to support this scale of development. The area has no heavy rail option and bus based measures are more limited Therefore further development in this location would perpetuate the existing car borne commuting patterns exacerbating existing congestion on the Ring Road and on heavily trafficated routes into central Bristol</p>
---	---

and consequently would be unsustainable.

Employment: Job worker ratio is very poor in this area and further housing would exacerbate this and further perpetuate car borne commuting out of the area. As demonstrated in EB76, of the four policy areas of, the Bristol East Fringe, the Bristol North Fringe, Yate/Sodbury and Thornbury, the Bristol East Fringe has the lowest employment density (0.6) and the lowest level of self containment (34%).

Assimilation into existing settlement pattern:

Oldland village has been expanded in the past and is now attached to the main urban area to the west; however it still retains to a village character. A limited number of services and facilities are provided along the village High Street (A4175), where there are a small number of properties on the east side of the main road within the Green Belt. New development could be physically attached to the limited established development to the east of the main road, but such a large scale development would result in a change to the character of this old established community and would not be located close to a variety of employment opportunities and higher order facilities and services and therefore exacerbate the current patterns of car borne commuting.

Overall Conclusion

The council has carefully assessed the sustainability merits of this site. In applying the planning balance as a result of concerns with the lack of coherence with the Plan's vision and spatial strategy, impact on the landscape, impact on the Green Belt, impact on the character of the existing community, the lack of sustainable transport options and the limited employment opportunities in the locality, it has not considered this site performs better than its preferred location at Thornbury, Morton Way north. The Oldland Common Urban Extension has therefore been rejected.

<p><u>Williams Close</u> (Site map 5)</p> <p>Site Capacity: 83</p> <p>EiP Documents: PSM7, PSM8 and PSM28</p> <p>PSM6</p> <p>PS7</p> <p>Previous EiP Hearing Session: Day 1, Tuesday 19th June (Green Belt)</p> <p>Day 12, Tuesday 17th July (please note the</p>	<p>Coherence with the Plan’s Vision and Spatial Strategy: Williams Close is located in area that does not accord with the spatial strategy as set out in the Core Strategy.</p> <p>Development here would require the release of the Green Belt land, which would be inconsistent with the Inspector’s Preliminary Findings, where he concludes that further consideration of the Green Belt should be undertaken at the time of the CS review in 2021 and in combination with the other West of England Unitary Authorities.</p> <p>Site Capacity: The capacity of the site is 83 and therefore this site fails to address the entire shortfall identified by the Inspector.</p> <p>Deliverability: Currently there is no planning application. An application for 83 dwellings (Planning Application ref: PK10/1220/O) was refused and the decision was upheld at appeal. An application for 25 dwellings (Planning Application ref: PK11/3082/O) was also refused. We do not know if the site is viable in accordance with the requirements of footnote 11 of the NPPF. See ‘Constraints’ below.</p> <p>Constraints The site is located in the Green Belt, which is afforded special protection by the NPPF, paragraph 79. The council concurs with the view of the Inspector who dismissed an appeal for 83 dwellings on this site in March 2011 (Examination Library Ref: EB73).</p> <p>The Inspector concluded:</p> <ul style="list-style-type: none"> • <i>“the site appears as an integral part of the green swathe of countryside that makes up the Hanham Hills. It is set above and apart from the urban fabric and forms part of the attractive setting to this part of the Bristol conurbation.”</i> • <i>And “Notwithstanding the remaining intervening fields the proposals would narrow the gap between Hanham and Longwell Green and encroach into the countryside. It would be at odds with Green Belt purposes.”</i> <p>Transport: Significant transport issues associated with distance to major centres of jobs and facilities in central Bristol, the Bristol North Fringe and congestion on key routes. There is a lack of a credible and deliverable transportation strategy and/or transport major scheme bid deliverable within the next 5 years, which would ameliorate these issues, as demonstrated by the justification for the Strategy for Housing – Appendix 1 (Examination Library Ref: EB21) and work by undertaken by Atkins (Examination Library Ref: RD41). Moreover, what capacity there might be in the network has been shown by Atkins to insufficient to support this scale of development. The area has no heavy rail option and bus based measures are more limited Therefore further development in this location would perpetuate the existing car borne</p>
---	--

commuting patterns exacerbating existing congestion on the Ring Road and on heavily trafficated routes into central Bristol and consequently would be unsustainable.

Employment: Job worker ratio is very poor in this area and further housing would exacerbate this and further perpetuate car borne commuting out of the area. As demonstrated in EB76, of the four policy areas of, the Bristol East Fringe, the Bristol North Fringe, Yate/Sodbury and Thornbury, the Bristol East Fringe has the lowest employment density (0.6) and the lowest level of self containment (34%).

Assimilation into existing settlement pattern:

Development of this site would significantly adversely impact on the attractive setting of this part of Bristol as it forms an integral part of an important green swathe of countryside making up the Hanham Hills. In addition development in this location would also narrow the gap between Hanham and Longwell Green, encroach into the countryside and be at odds with Green Belt purposes.

Overall Conclusion

The council has carefully assessed the sustainability merits of this site. In applying the planning balance as a result of concerns with the lack of coherence with the Plan's vision and spatial strategy, impact on the landscape, impact on the Green Belt, the lack of sustainable transport options, the limited employment opportunities in the locality and the inability to be appropriately assimilated into the existing settlement pattern, it has not considered this site performs better than its preferred location at Thornbury, Morton Way north. Land at Williams Close has therefore been rejected.

<p>Yate/Chipping Sodbury</p>	
<p><u>Engine Common - Land between Iron Acton Way and North Road</u> (Site map 6)</p> <p>Site Capacity: 210</p> <p>EiP Documents: PSM7, PSM8 and PSM21</p> <p>Previous EiP Hearing Session: Day 8, Friday 29th June</p>	<p>Coherence with the Plan’s Vision and Spatial Strategy: Engine Common is a rural settlement. The Core Strategy directs strategic growth to higher level settlements. In accordance with this strategy Thornbury performs as a more sustainable location than Engine Common. Thornbury has a broader range of services and facilities and functions as a market town with a hinterland.</p> <p>Any potential development at Engine Common falls to be considered against Policies CS5 and CS34. The scale of the development required to address the shortfall does not confirm with the policy requirements of CS5, which permits up to 30 dwellings to be built when supported by the local community.</p> <p>Policy CS34 states at para 3, that the unique and valuable setting provided by the rural areas to settlements, such as Engine common, will be protected. Engine Common is currently physically separated from Yate; the development of this omission site would effectively join the two together. The character, function and form of Engine Common, a linear village, and its setting, formed by the adjoining countryside, would be detrimentally affected. As a result, development would fail to either conserve or enhance the sense of place and identity.</p> <p>Development at Engine Common is not required to address the strategic growth requirements of Yate/Chipping Sodbury as this is addressed through allocation of the north Yate New Neighbourhood and infill development.</p> <p>Site Capacity: The site fails to address the entire shortfall identified by the Inspector, as its capacity is 210 dwellings.</p> <p>Deliverability: The council has registered a planning application (PK/12/1751/F). The submission of a planning application for residential development demonstrates a commitment from a developer/landowner to pursue the delivery of the site. The site is subject of a current appeal against non-determination with the appeal to be heard on 5th March. However this is considered to carry no weight given the in principle policy objections and conflict with the Plan’s Strategy. The council is also most concerned that the appeal is being held ahead of the Core Strategy EiP. The Council maintains its position that the findings of the Core Strategy Inspector are highly material to any outcome the S78 inquiry may come to. This position has been set out clearly to PINS and the appellant. Nonetheless, PINS have decided to hold the appeal before the outcome of the Core Strategy Inspector’s findings are known. This matter the council has, with regret, been obliged to participate in. It is committed to ensuring that decisions made are consistent with the plan-led system and any decision</p>

the S78 comes to must take proper account of the materiality of the Core Strategy Inspector's Further Preliminary Findings and Final Report.

Constraints:

Transport: The site is not closely related to a town centre, the nearest town centre being Yate. This is outside a comfortable walking distance.

The site includes part of an SNCI. But this is in poor condition and if lost to development could be off-set by creating similar sward grassland elsewhere across the site.

Assimilation into existing settlement pattern:

Engine Common is defined to a great extent by the strong linearity of the North Road and parallel alignments of Dyers and Engine Common Lanes either side. Between is a distinctive pattern of small rectangular field boundaries. This unusual and distinctive form is the result of the enclosure of the area in the 17th and early 18th centuries for the exploitation of coal deposits. Development of the omission site fails to respond to the distinct north-south alignment of these highways or rectangular nature of the local field pattern, instead proposing an indistinct 'suburban bulge' out of character and disproportionate to the form and character of the settlement.

The development of the omission site would have a suburbanisation effect and remove the separation from Yate that the village enjoys.

Development of the omission site would have the affect of increasing the number of dwellings at Engine Common from 107 to 317, or an increase of 196%. This would greatly impact on the character and identity of Engine Common. This would be out of scale with the non-strategic growth envisaged for this area by the Core Strategy emerging policy CS5.

The rural character including the physical and social characteristics of a small rural village will be altered by changing the relationship Engine Common has with Yate, through the creation of a visual and physical connection, which erodes the separation of the two settlements. This will effectively result in the suburbanisation of Engine Common.

It is therefore considered that the development cannot be assimilated into the existing settlement pattern, without causing significant harm.

Overall Conclusion

The council has carefully assessed the sustainability merits of this site. In applying the planning balance as a result of

	<p>concerns with the lack of coherence with the Plan's vision and spatial strategy, impact on the rural village of Engine Common and the inability to be appropriately assimilated into the existing settlement pattern, it has not considered this site performs better than its preferred location at Thornbury, Morton Way north. Land at Engine Common has therefore been rejected.</p>
--	---

<p><u>East of Chipping Sodbury</u> (Site map 7)</p> <p>Site Capacity: 700</p> <p>EiP Documents: PSM7, PSM8 and PSM21</p> <p>Previous EiP Hearing Session: Day 8, Friday 29th June</p>	<p>Coherence with the Plan’s Vision and Spatial Strategy: Development East of Chipping Sodbury does not accord with the spatial/development strategy. Growth in the Yate/Chipping Sodbury area will be addressed by the north Yate New Neighbourhood and through infilling</p> <p>Site Capacity: The site has capacity for 700 dwellings.</p> <p>Deliverability: Currently there is no planning application. We do not know if the site is viable in accordance with the requirements of footnote 11 of the NPPF. See ‘Constraints’ below.</p> <p>Constraints: Flooding: There are areas of the Flood Zone 2 and 3b identified in the SFRA Level 1 Report. However the SFRA Level 2 Report did not address this area and no Flood Risk Assessments have been prepared</p> <p>Landscape: Development will impact on the expansive open views to and from the Cotswold AONB, which is elevated above the site and will invade the currently well established rural area beyond the urban edge formed by St Johns Way. The AONB Management Plan seeks to protect the setting of the Cotswold scarp. Development would impact on tranquillity of Sodbury Common (SNCI). Introducing landscape buffering will also bring a greater degree of enclosure and physical intrusion into an expansive rural landscape of open commons and fields.</p> <p>Heritage: This area is contained within a deer park dating from at least 1310 but may be earlier. A desk-based assessment has been carried out which indicates that the potential for the survival of significant archaeological structures and deposits within the park is limited; however further survey work is required.</p> <p>The number of listed buildings surrounding the site illustrates its sensitivity. The majority of these listed buildings originated as farmhouses and the rural, open and tranquil landscape context is fundamental to an understanding and appreciation of their architectural and historic interest, and contributes positively to their setting. The development of this site for large scale housing would therefore cause harm to the settings of these many listed buildings. Approximately 1.2km to the east of the site is the grade II* listed St John’s Church at Old Sodbury. This stands on elevated ground and from the western end of the churchyard extensive views to the lower ground below, including Chipping Sodbury and Yate can be gained. This is an important viewpoint on the Cotswold Way. Due to the historic sensitivity of the site and the likely impact that development would have on the settings of a number of designated heritage assets, it is strongly recommended that this would not be an appropriate site for development, as it would conflict with national guidance set</p>
--	---

out at the NPPF (para 132) and policy L13 of the Adopted Local Plan.

Transport / Access to facilities: Development would be located the furthest from Yate train station and main employment areas in Yate; this would lead to a car based form of development.

Open Space and Public Footpaths: Public open space runs along side St John's Way and the River Frome. Two long distances footpaths the Monarchs Way and the Frome Valley Walkway pass through this open space. Highway access to the site would need to pass across/over these constraints.

Ecology: The River Frome is a SNCI and the north boundary of the site adjoins the Sodbury Common SNCI.

Assimilation into existing settlement pattern:

The site would be extremely difficult to assimilate with the existing settlement pattern. The site is separated from the existing built form of the town by St Johns Way road, a Primary Distributor Road and the River Frome and areas of flood risk. There are two existing footbridges crossing the river, which offer a degree of pedestrian access. The only way that access could be provided is by two new road bridges. This would involve crossing a continuous area of public open space alongside the River Frome, the long distance footpaths known as Monarchs Way and Frome Valley Walkway and the River Frome. The severance cause by these two new road accesses would detrimentally affect the continuity and open aspect of the public open space, impact on the rural experience and rural views of these long distance footpaths. These two crossings may also have adverse effects the nature conservation interest of the SNCI along the River Frome.

Overall Conclusion

The council has carefully assessed the sustainability merits of this site. In applying the planning balance as a result of concerns with the lack of coherence with the Plan's vision and spatial strategy, impact on the landscape and heritage assets, and the inability to be appropriately assimilated into the existing settlement pattern, it has not considered this site performs better than its preferred location at Thornbury, Morton Way north. Land east of Chipping Sodbury has therefore been rejected.

<p>Thornbury</p> <p><u>Morton Way north</u> (Site map 8)</p> <p>Site Capacity: 300</p> <p>EiP Documents: PSM7, PSM8 and PSM27</p> <p>Previous EiP Hearing Session: Day 11, Friday 13th July</p>	<p>Coherence with the Plan’s Vision and Spatial Strategy: The Core Strategy’s spatial/development strategy allows for development at Park Farm Housing Opportunity Area and infill within the settlement boundary. Further development at Thornbury would therefore be contrary to the spatial/development strategy at present. However, Thornbury is identified as an area where further growth will promote greater self containment and enable the town to fulfil its vision and objectives, as set out in paragraph 3.24 of the SA EIP Examination Ref PS3. The council considers that Thornbury is the next most sustainable location to accommodate further strategic growth after the urban areas and Yate/Chipping Sodbury.</p> <p>Site Capacity: The site has a housing capacity of 300.</p> <p>Planning application submitted and appeal for non-determination lodged.</p> <p>Deliverability: The submission of a planning application for residential development (PT12/2395/O) demonstrates a commitment from a developer/landowner to pursue the delivery of the site.</p> <p>Constraints There are no overriding constraints to development on this site, subject to appropriate design and layout, incorporating mitigation where appropriate.</p> <p>Flooding: There are areas of Flood Zone 3a and 3b along the Pickedmoor Brook identified in the SFRA Level 2 Report.</p> <p>Heritage: Outside the site there are four listed buildings, their settings could be affected if mitigation was not successful. Desk-based assessment and geophysical survey have been undertaken for this area. These reports indicated that the potential for significant archaeology is limited.</p> <p>Ecology: There are no statutory or non-statutory nature conservation designations on the site, or adjoining it. There are some species-rich hedgerows, the rest of the site is intensively farmed and therefore offers little ecologic interest, except for the brook.</p> <p>Landscape: no in principal objection, but a new landscape structure would be needed to ameliorate the impact on the wider landscape and to create a new defined edge to the settlement.</p>
---	---

Transport/Access: The site is disconnected from the main urban area by Morton Way and consequently there is a need to ensure that new attractive, safe and stimulating pedestrian and cycling connections are provided to ensure successful integration with the existing development. The current underpass to Morton Way and the potential to extend the existing streamside walk into the development area provides a unique opportunity to facilitate such connections. The secondary school, (Castle School), is closer to this site than it is to the Morton Way south site, whilst the employment opportunities at Midland Way are further away, but within acceptable cycling distance.

Assimilation into existing settlement pattern:

The site is separated from the existing built form of the town by Morton Way road. As set out in the December 2011 Sustainability Appraisal Report (PS7) strong links are needed to mitigate the severance caused by the road. This site is currently served by an underpass providing pedestrian access to and from the town. Any design would need to address the relationship and connections across Morton way to ensure effective integration with the existing settlement pattern. The presence of flood risk extents within the site provides a unique opportunity to develop an extension to the existing streamside walk and a small country park within the development area. This would enable this new area of public open space to serve both the residents of the new development and the existing community and enhancing their integration. The Department for Transport's "Building Sustainable Transport into New Developments", April 2008, states that "The propensity to walk or cycle is not only influenced by distance but also the quality of the experience; people may be willing to walk or cycle further where their surroundings are more attractive, safe and stimulating." It is considered that this new attractive off road feature would have the potential to greatly encourage people to walk and cycle to facilities and services in the town.

Overall Conclusion

The council has carefully assessed the sustainability merits of this site. In applying the planning balance the council considers this site performs as the most sustainable of all the omission sites. Land at Morton Way north, promoted by Bloor Homes has therefore been put forward as the preferred site.

<p><u>Morton Way south</u> (Site map 8)</p> <p>Site Capacity: 500</p> <p>EiP Documents: PSM7, PSM8 and PSM27</p> <p>Previous EiP Hearing Session: Day 11, Friday 13th July</p>	<p>Coherence with the Plan’s Vision and Spatial Strategy: The Core Strategy’s spatial/development strategy allows for development at Park Farm Housing Opportunity Area and infill within the settlement boundary. Further development at Thornbury would therefore be contrary to the spatial/development strategy at present. However, Thornbury is identified as an area where further growth will promote greater self containment and enable the town to fulfil its vision and objectives, as set out in paragraph 3.24 of the SA EIP Examination Ref PS3. The council considers that Thornbury is the next most sustainable location to accommodate further strategic growth after the urban areas and Yate/Chipping Sodbury.</p> <p>Site Capacity: The capacity of this site is 500 dwellings.</p> <p>Deliverability There is no planning application and we do not know if the site is viable in accordance with the requirements of footnote 11 of the NPPF.</p> <p>Constraints Ecology: The site adjoins one SNCI and is near to another. These SNCI are designated as ancient woodland, and wildlife enjoys the species-rich hedgerows that connect the two woodlands. Development of this site has the potential to significantly impact on the ecological value of the hedgerow network and the nearby SNCIs. The ancient woodlands cannot be relocated and are irreplaceable.</p> <p>Landscape: No in principle objection subject to development being limited to the lowest parts of the site. The woodland on the northern edge provides visual containment as does the higher ground to the east.</p> <p>Transport/Access: The site is disconnected from the main urban area by Morton Way. Unlike the Morton Way North site, this site does not benefit from an underpass to Morton Way and stream connection into the existing built area which could be developed into an attractive off road pedestrian/cycling route. Employment opportunities at Midlands Way are closer than the Morton Way north site, whilst the secondary school, Castle School, is further away.</p> <p>Assimilation into existing settlement pattern: The site is separated from the existing built form of the town by Morton Way. Any design would need to address the relationship and connections across Morton Way to ensure effective integration with the existing settlement pattern. Unlike Morton Way north site, this site does not benefit from an existing underpass and stream connection which could be developed to provide an attractive safe and stimulating pedestrian/cycle link to the existing urban area.</p>
---	--

	<p>Overall Conclusion</p>
--	----------------------------------

The council has carefully assessed the sustainability merits of this site. In applying the planning balance as a result of concern with the impact on ecology, it has not considered this site performs better than its preferred location at Thornbury, Morton Way north. Land at Morton Way south has therefore been rejected.