



## Representations to South Gloucestershire Council Policies, Sites & Places Plan

### **Land at Tytherington**

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## 1.0 Introduction

- 1.1 Alder King Planning Consultants have been instructed by Cotswold Homes to submit representations to the consultation on South Gloucestershire Council Policies, Sites and Places Plan. This relates to the promotion of land near Duck Street, Tytherington ('the Site') for residential; development (up to 37 units). A site plan is attached at **Appendix 1**.
- 1.2 This South Gloucestershire Policies, Sites and Places Plan ('PSP') consultation focuses on the suitability and deliverability of additional housing in rural areas to address an identified shortfall of housing land required to be delivered through the adopted Core Strategy 2013.
- 1.3 These representations comprise general commentary on the current housing supply context and the Council's methodology of delivering sustainable housing development. These representations also include observations on the assessment of Tytherington's sustainability in relation to sections 17-21 of the current consultation document.

## 2.0 Current Housing Supply Context

- 2.1 South Gloucestershire Council ('the Council') cannot demonstrate a five year supply of deliverable housing land to meet the previously assessed housing needs of the district contained within the Core Strategy. It is noted in the consultation that it is at least 1,500 houses short and can only demonstrate 4.28 years supply of deliverable housing land at best.
- 2.2 This current lack of supply of deliverable housing land is particularly poignant in the context of the West of England Joint Spatial Plan which will increase the development needs of the district by requiring the Council to provide additional houses over and above those already identified in the Core Strategy. The development strategy contained within the Core Strategy Vision at para 4.27 allows for a review, and where appropriate, realignment of existing defined settlement boundaries in the rural areas to identify sites for required housing. This approach is supported, as well as the dwelling cap of 150 units for new rural development.
- 2.3 We agree that smaller scale development distributed across the district at existing settlements will comprise an important element of the overall housing requirement.

## 3.0 Sustainability Access Methodology for Site Selection

- 3.1 The consultation documents demonstrate a detailed methodology which the Council have used to assess the sustainable access of housing land for potential allocation through the PSP. Below we review steps 1-4 of the sustainable access assessment process and make general comments as well as site specific comments in relation to the promoted site.

## 4.0 Sections 17 & 18 (Step 1) – Sustainable Access Location & Ranking

### **Section 17: Sustainable Access to Key Services and Facilities: Sequential Locations**

- 4.1 Paragraphs 17.1 and 17.2 are supported and which state that the intention to address the short fall in supply through delivering houses in sequentially preferable locations within the rural areas. We support the majority of the Key Services and Facilities table but would make the following comments.

#### **Doctors Surgery**

- 4.2 The inclusion of doctors' surgeries as part of health facilities does not accurately reflect the changing nature of the healthcare system. There is a political move for the decentralisation of healthcare and it is now more likely to have a health centre hub serving a few villages rather than a surgery in each village; the sustainable accessibility of health centre hubs should be acknowledged.

- 4.3 This is particularly the case in terms of the Tytherington area where Thornbury has become the main healthcare hub for the area. The key services and facilities table should acknowledge that there is a frequent bus service that goes from the centre of Tytherington and stops outside Thornbury Health Centre which is less than 3km away from Tytherington and takes less than 10 minutes on the bus. Tytherington should therefore be granted at least one point in recognition of good connectivity to area healthcare services.

#### **Employers with 100+ jobs**

- 4.4 Very few rural areas will have major employers with 100+ jobs and as such the inclusion of this as assessment criteria for the sustainability of rural settlements is misleading. It is more likely that there would be several businesses with 10 to 15 employees locally. The definition of employers in these rural settlements should be more realistically defined given the context and nature of rural enterprise, and the increasing preference for home working.
- 4.5 This is particularly the case with Tytherington which has several small to medium businesses in the village. The Core Strategy Area Profile for Tytherington noted that there are approximately 160 jobs in the locality with the majority working for/as a small employer. It also notes a wide range of jobs are available in Thornbury, which is easily accessible by bus. There is a frequent direct bus service on weekdays and at the weekend from Tytherington to Cribbs Causeway which is a major employer in the district.

#### **Defined Town Centres**

- 4.6 The only defined town centres relevant to this consultation process are Thornbury, Chipping Sodbury and Yate. However the consultation document acknowledges at paragraph 4.3 that these areas, whilst sustainable are likely to be unable to accommodate the shortfall proposed. As such this criteria should be widened to include acknowledgement in the form of points for rural settlements that are well placed with good sustainable accessibility to these defined town centres, such as Tytherington.

#### **Superfast Broadband**

- 4.7 The Council allocate 6 points on whether superfast broadband exists which in proportion to the assessment figure is high. The National Planning Policy Framework at para 42 states a high speed broadband should enhance community facilities, not that it should be a community facility that ranks equally to or replaces a good public transport network. However the Council assessed some settlements as acceptable access (Tier 3) purely on the basis of having superfast broadband such as Oldbury on Severn despite scoring zero for public transport services so in this assessment the broadband effectively replaces accessibility to public transport. Without broadband Oldbury and other settlements would score significantly lower. In this way the table and assessment are significantly skewed. This is especially so given that the Council acknowledge in the Rural Settlements and Villages Topic Paper 2015 p.19, that the capacity of the broadband is unable to be measured and is unknown. Restricting the ability to provide much needed housing in an otherwise sustainable and accessible location on the basis of an unknown broadband speed is inappropriate.
- 4.8 With regard to site specific matters, having undertaken research of properties in Duck Street via estate agents and property searches, it is clear that there is high speed broadband on properties in Duck Street (up to 75MB) in Tytherington, therefore at the very least the Key Services and Facilities table should reflect this.

#### **Section 18: Sustainable Access to Key Services and Facilities: Ranking of Villages and Settlements**

- 4.9 Paragraph 18.2 is supported in that it acknowledges that sites adjoining settlements in all ranking tiers will be considered as potential allocations, although this seems to conflict with paragraph 18.5 which states that if no sites are proposed in villages or settlements, no allocation can be made. It is suggested that the sentence at para 18.5 is removed for purposes of clarity.
- 4.10 Paragraph 18.7 is supported in so far as it clarifies that there is potential for settlements to move into different ranking tiers when full capacity of services and facilities has been taken into account. For the reason listed above at paragraphs 4.3, 4.5, 4.6 and 4.9 of this representation, the table does not accurately reflect the provisions and accessibility of Tytherington. Tytherington has better connectivity and a more accessible range of services than the table suggests and when compared to the majority of other settlements listed in Tier 4. As such Tytherington should be moved to Tier 3.

## 5.0 Section 19 (Step 2) – Impact on Character of Existing Settlements

- 5.1 We support paragraphs 19.1 and 19.2 where it is recognised that improved key services may lead to more sustainable outcomes through appropriate development solutions.
- 5.2 We attach a completed Call for Sites Form and would reiterate that the proposed development at Duck Street of up to 37 dwellings would be acceptable. It would result in a population increase of circa 14% based on predicted 2016 average household numbers from the October 2013 SHMAA and the settlement population figures from 2011 contained at p.33 of the Rural Settlements and Villages Topic Paper 2015. It is considered that the existing population of Tytherington is likely to be more than that identified in 2011 at this time. Accordingly the proposed increase in population is proportionate and would retain the village character of the locality whilst improving the rural vitality, viability and longevity of this settlement.
- 5.3 The proposed development would address community aspirations by providing new open market and affordable homes for those who wish to stay in the village. The applicant will review the existing drainage infrastructure as part of any planning proposal. With regards to providing suitable modern communication infrastructure, this is unclear. It is understood that good telephone and broadband facilities are already accessible to dwellings on Duck Street.

## 6.0 Section 20 (Step 3) – Assessing the Suitability of Potential Housing Sites

- 6.1 We support paragraph 20.1 for the reasons supplied above at paragraph 2.3. With regard to the site assessment considerations we would confirm that the Site being promoted is not protected or required for an alternative use. The Site is outside the Green Belt and outside the conservation area. There are no site specific constraints or heritage assets (listed buildings or conservation areas) on (or near) the Site. There are no specific biodiversity or landscape designations. Topographically the Site is flat and geographically located near the centre of the village. The Site is outside but adjoins the existing settlement boundary with residential built form on two of the four sides and is not subject to a Local Green Space designation. The Site is in Flood Zone 1 with no environmental impacts that would affect existing, neighbouring or future occupiers of the Site. There are frequent weekday and weekend bus services from the centre of the village near the Site which connect Tytherington with the defined town centres of Chipping Sodbury, Thornbury and Yate as well as out of centre Cribbs Causeway and the wider district and Bristol.

## 7.0 Section 21 (Step 4) – Assessing the Availability and Achievability of Sites

- 7.1 The details of this section are generally supported. With regard to site specific matters, the Site is available and deliverable within 5 years. Having discussed the accessibility of the Site with Local Authority Transport officers, it is considered that the Site is likely to be acceptable in principle in access terms subject to an acceptable Transport Statement. The Site is readily serviceable with no pylons or significant infrastructure issues. There is access to electricity and drainage. Given historical use, the Site is unlikely to require significant land remediation.

## 8.0 Conclusion

- 8.1 This Site is adjoining the settlement of Tytherington which has a range of services and good accessibility and connectivity. It has good links to the market town of Thornbury some 3km away within cycling distance and easily accessible by public transport where there are a good range of community facilities, health care services, retail and employment opportunities. Tytherington also benefits from a post office, pub, shop, high speed broadband as well as educational facilities and as such should be reclassified into Tier 3.
- 8.2 The Site has no constraints or site sensitivities and is in proximity to the centre of Tytherington, close to bus stops and pedestrian and cycle routes. The Site adjoins the existing settlement with established residential built form on two out of four sides. The Site is available and deliverable and being promoted by a developer

with a planning team ready to progress this Site with confidence. As such we attach a completed call for sites form. We would request the allocation of this Site for residential development.

## Appendix 1:

### Red Line Site Location Plan





## Policies, Sites and Places Plan – Call for Sites Response Form

This form should only be used by landowners and developers that are promoting a site for inclusion in the PSP Plan.

Comments are invited on the issues set out in paragraphs 19.1 – 22.2 of the PSP Plan Regulation 18 Consultation document in respect of the suitability, availability and achievability of potential housing sites. The purpose of these questions is to gauge potential preparedness to engage constructively in a possible planning application process, likelihood of achieving policy compliant schemes and early delivery of dwellings.

Comments related to the general methodology and process should be set out on the response form for the Regulation 18 Consultation document, available online: [www.southglos.gov.uk/PSPconsultation](http://www.southglos.gov.uk/PSPconsultation)

Please note that freedom of Information regulations mean that the Council cannot treat any information supplied confidentially.

For enquiries or assistance please contact the Strategic Planning Policy and Specialist Advice Team 01454 863469 or [planningLDF@southglos.gov.uk](mailto:planningLDF@southglos.gov.uk)

### 1. YOUR DETAILS

Ref Number (for office use only)

Name

Genevieve Collins

Company/Organisation  
(If relevant)

Alder King Planning Consultants

Address

Pembroke House,  
15 Pembroke Road,  
Clifton,  
Bristol

Postcode

BS8 3BA

Telephone

Email address

I am (please tick all those that apply)

Owner of part of the site	<input type="checkbox"/>	Land agent	<input type="checkbox"/>
Planning consultant	<input checked="" type="checkbox"/>	Developer	<input type="checkbox"/>
Affordable Housing Provider	<input type="checkbox"/>	Amenity/Community Group	<input type="checkbox"/>
Local resident	<input type="checkbox"/>	Other	<input type="checkbox"/>

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## 2. SITE DETAILS

Site address

Land off Duck Street  
Tytherington  
South Gloucestershire

Site Postcode

n/a

Grid ref. (if known)  
e.g. 367712,177756

366950, 188121

Site area (hectares)

1.5 ha

Current use(s)

Agricultural land

Relevant Planning History  
(if known - please include any relevant planning application reference number(s) and confirm if the site has previously been submitted in response to a call for sites for the PSP or other Local Plan process).

No relevant planning history

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### 3. PROPOSED FUTURE USES AND CAPACITY

Please indicate if the proposal is for 100% residential or a mixed use scheme (and if so the intended proportions and respective capacity of each use.)

Proposed residential development for up to 37 dwellings units with associated works (access, landscaping, parking)

Please state how your proposal is proportional to the existing size and character of the settlement. E.g. % increase of existing settlement (Demographic data on existing settlement size is set out in the Rural Villages and Settlements Topic Paper (2015)

The proposed development of up to 37 dwellings would represent a population increase of approximately 14%. This is based on predicted 2016 average household numbers from the October 2013 SHMAA and the settlement population figures from 2011 contained in the Rural Settlements and Villages Topic Paper 2015. It is considered that the existing population of Tytherington is likely to be more than that in 2011. Accordingly the proposed increase in population is both proportionate and would retain the village character of the locality whilst improving the rural vitality and viability of this settlement.

Please state how your proposal will address/contribute to the community aspirations established during previous consultation rounds of the PSP Plan and listed at Appendix 2 of the November 2015 PSP Plan consultation document

The proposed development would address community aspirations by providing more accommodation for those who wish to stay in the village and will review the existing drainage infrastructure as part of any planning proposal. With regards to providing suitable modern communication infrastructure, this is unclear. It is understood that good telephone and broadband facilities are already accessible to dwellings on Duck Street.

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### 4. SITE OWNERSHIP AND STATUS

I (or my client/organisation)

Is sole owner of the site

[ X ]

Owns part of the site

[ ]

Do not own the site

[ ]

If you are not the owner, or only own part of the site, do you know who owns the site or the remainder of it (please provide details, including a plan showing site ownerships)

Does the owner (or other owner(s) support your proposals for the site?

[ Yes ]

Is the land for sale? If so how long has it been on the market?

Yes- Option agreement subject to planning

Are there any covenants

Unaware of any covenants or legal issues that may restrict development

or other legal issues that may restrict development potential? If so please explain. (including wayleaves and easements)

Has the land been subject to developer interest e.g. initial interest, a feasibility appraisal, option agreement or contract to purchase? If so please provide details including the nature of the option agreement(s) and purchase contract(s).i.e. fixed / minimum value or subject to planning.

**Yes - Option agreement subject to planning**

Have any utility searches been undertaken?

[ No ]

If so is the site readily serviceable? Please provide details of which utilities are available to the site.

**Yes – limited constraints and serviced by electricity and drainage.**

Have or are consultants engaged to undertake any studies or design work?

[ Yes ]

If so who and when? Please provide details. Please indicate if those studies may be made available to the Council?

**Alder King Planning Consultants.**

Please indicate an approximate timescale for delivery (no. of dwellings per year):

2016/2017	2017/2018	2018/2019	2019/2020	2020/2021
	15	22		

2021/2022	2022/2023	2023+

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## 5. SITE CONSTRAINTS

Has the highway authority been consulted? [ Yes ]

If so please provide details, of when and any conclusions.

Informal discussion with Highways officers in September 2015.

Has any proposed scheme been financially appraised? [ n/a ]

If so did the appraisal conclude that a development would be viable and provide a reasonable return to the landowner? [ n/a ]

Can any assumptions and or the appraisal work be provided to the Council? [ n/a ]

Have any soil investigations been undertaken? [ n/a ]

If so was any significant contamination found or need for further investigations advised? Please provide details.

[ n/a ]

Is the site subject of a Local Green Space nomination or any other such designation? If so please provide details below.

No

*With regard general site constraints the Council retains significant information and expertise with regard these issues. The Council **does not** advise that such studies should be commissioned at this time if not already done so. Depending on the Council's initial considerations interested parties will be advised where necessary if and when additional study work should be undertaken to support a proposed allocation.*

Would the site impact on any landscape, ecological, archaeological or built heritage interests? Please provide use the box below to provide information of any such interests where known and the details of studies undertaken.

Based on information sourced from SGC policy maps and documents and LPA officers, Magic & Historic England the site has no constraints in terms of landscape, ecological, archaeological or built heritage interests. It is outside the green belt and conservation area with no listed buildings.

Is the site known to suffer from any flooding issues (river or drainage related)? Please provide details, and of any studies undertaken, in the box below.

Information provided by the Environment Agency indicates that the site is flood zone 1.

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## **6. ADDITIONAL COMMENTS**

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The information collected as part this consultation will also be used by the Council in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data are: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the response form, in accordance with the Freedom of Information Act 2000.

Please see accompanying submitted representation