

# View Response

## Response #923554

**From** Barwood Development Securities...

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**Status** Complete

## 1: Understanding who is responding

Please help us understand the type of groups and people that are responding and engaging with the preparation of our new Local Plan, by choosing which one of the following stakeholder groups you best represent.

You must choose one option to be able to submit your response.

You must provide an answer to this question.

Developer, land agent or site promoter

If other, please state:

«No response»

## 2: Comments on the Sustainability Appraisal

If you have any comments on the Sustainability Appraisal please tell us below:

We have the following comments to make in response to the Sustainability Appraisal supporting this component of the consultation document:

? 1a Contribution to Climate Change: It is unclear why Building Block 3 (Market Towns) has been given a similar score to Building Block 4 (Rural Settlements) – they are by their nature, completely different in terms of their services/facilities, and employment opportunities – and thus associated opportunities for sustainable travel. More specifically, the reference at paragraph 4.39 to Thornbury and access to Enterprise Areas is incorrect (bus service T1 provides direct access to Filton Enterprise Zone in less than 20 mins (the standard suggested in Appendix 4 of the SA).

There is also no explanation why a new settlement (Building Block 5) would score better than the existing Market Towns. Whilst any new settlement would be required to deliver community facilities; whether it would deliver an entirely new High Street and the scale of development already at Market Towns is very questionable. Take for example the previous new settlement proposals at Buckover. This had a far smaller retail/community offer than that which exists at the market towns of Yate and Thornbury. Thus, whilst recognising that it will deliver benefits, in terms of its assessment against Objective 1a), it cannot be considered to be more positive than development Market Towns.

? 2c (Air Quality) and 2b (Noise): In line with the comments above, it is of concern that Building Block 3 scores comparably to rural development in this regard. A dispersed strategy of smaller scale growth is likely to have a greater impact, particularly on air quality, than planned larger scale growth at the Market Towns.

? 2a (Public Open Space): Paragraph 4.42 indicates that the Market Towns have some existing public open space, and it is thus scored a minor positive. In regard to Building Block 4 – this is scored positively because it has access to the countryside, and Building Block 5 because it will enable the delivery of new public open space. Both of these

positive attributes are equally applicable to Building Block 3, and we would suggest clearing indicate that in relation to this objective, Building Block 3 should score ‘++,’ being capable of achieving three separate individual positives.

? 2d/3c/3d/3e (Access to health, education, community, and retail): No commentary is provided in respect to the scores attributed to Building Block 3 for these objectives. We note that in relation to Building Block 2, reference is made to the scale of development providing opportunity to deliver new services/facilities (#4.44); and it scores positively as a result. We suggest that at this stage, there is no indication that large-scale development via Building Block 3 would not also secure new services/facilities. It is very surprising that Building Block 3 has been scored the same as Building Block 4 given there are clear differences between the access to services and facilities between the Market Towns and rural settlements. We would expect there to be a differentiation between these two building blocks when assessed against this objective.

? 4a (New Employment Floorspace): Any large-scale development, whether urban extensions to Market Towns or new settlements, is capable of delivering new employment floorspace whether within a joint allocation, or via standalone employment allocations across the same settlement. At this stage of the new Local Plan process, we do not consider that there is justification for scoring Building Block 5 higher in this regard – with development associated with Building Blocks 2 and 3 equally capable of delivering large scale employment.

? 5a and 5b (Historic Environment): It is virtually impossible to robustly test such broad spatial strategies against the impact that they would have on designated and undesignated assets. Rather than attempt to apply a measure at this stage which would inevitably be based upon a wide range of assumptions about not only the sites which fall

within the building blocks, their scale, the proximity to heritage assets, inherent and designed mitigation measures etc, this objective should be applied at the next stage of SA.

? 5e (Green Infrastructure): In line with our comments above, it is unclear why Building Block 3 has been scored lower than 2 and 5. It may be equally capable of delivering green infrastructure at the scale of the other two. It is incorrect to assess Building Block 3 as the same as Building Block 4 – larger scale development in the Market Towns would likely deliver substantially more new green infrastructure than smaller scale rural development.

Green Belt:

The consideration of development options within the Green Belt must be assessed in accordance with national planning policy – with consideration first required to sustainable locations outside of the Green Belt. The inclusion of a single objective within the SA doesn't constitute a robust assessment in this regard, and we assume that in moving to the next stage of the Local Plan, that this element of the evidence base will be developed further.

**3:**

Upload an attachment

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«No files»