

CRITIQUE OF LAND AT SOUTH WEST BRISTOL

1.0 BACKGROUND

- 1.1 An urban extension has been promoted at South West Bristol (also referred to as Ashton Park) which falls largely within the administrative area of North Somerset Council.
- 1.2 The site adjoins the city of Bristol and is bounded by the A370 to the north, Barrow Hospital to the west, the lower slopes of Dundry Hill to the south and the Bristol suburbs of Highridge, Bedminster Down and Ashton Vale to the east and north east.
- 1.3 Four Areas of Search for urban extensions to Bristol were identified in the emerging South West RSS. This included land at South West Bristol. However, failure to apply the SEA Directive correctly lead to delays which have since been overtaken by the Government's intentions to abolish Regional Strategies, and hence the RSS was never adopted.
- 1.4 On 3rd September 2009 a planning application was submitted for:

"a mixed use development comprising 9500 dwellings; 60000 m2 of employment space; retail development; sports and leisure facilities; health and community facilities; hotel; strategic and local transport infrastructure; strategic and local green infrastructure including public open space and play space; water attenuation features; a secondary school and up to six primary schools and waste to energy facility; with all matters reserved for subsequent approval."

- 1.5 The Council did not determine the application and the time limit for lodging an appeal has expired. There has been no progress made on the application since July 2010 and the Council has resolved to finally dispose of the application (letter to Baker Associates dated 6th May 2011).
- 1.6 The submission North Somerset Core Strategy does not make provision for an urban extension at South West Bristol.

2.0 OPPOSITION TO THE PROPOSALS

- 2.1 With the legal requirement to conform to the emerging RSS, North Somerset considered potential options for accommodating 9,000 dwellings in an urban extension at South West Bristol in its Core Strategy Issues and Options leaflet (2007) and the Consultation Draft Core Strategy (2009).
- 2.2 However, in anticipation of the revocation of Regional Strategies and demonstrative of its objection to the urban extension at South West Bristol, the Submission Core Strategy (January 2011) makes no provision for development in this location.

- 2.3 The Council has always maintained an objection to an urban extension at South West Bristol which has been evident in its representations to the South West RSS, in the preparation of the Core Strategy and in other newsletters and press releases. Development at South West Bristol is not supported by the Council.
- 2.4 The opposition to the South West Bristol extension from the local community has been immense. A number of action groups were set up specifically to object to the proposals, such as Dundry Residents Against Growth (DRAG) and Hands Off Long Ashton (HOLA).
- 2.5 In addition, a number of groups have come together to object to the South West Urban Extension including Barrow Gurney Parish Council, Cater Road Traders Group, Dundry Parish Council, Greater Bedminster Community Partnership, Hartcliffe and Withywood Community Partnership, and Yanley Residents Group.
- 2.6 Such is the opposition that a series of protests were arranged and a petition against the development secured over 2,000 signatures. In addition, 153 formal objections were raised against the development. Some extracts from the Evening Post illustrate the level of opposition to growth in this area.

"HOLA is... fiercely campaigning against the plans as part of the Regional Spatial Strategy (RSS) to build 10,000 homes – a town the size of Clevedon called Ashton Park – on green belt land in the Ashton Vale.... "We want the people of Long Ashton to see what could be lost if these threatened developments go ahead."... Bristol Evening Post on 6th June 2009.

"More than 100 protesters held a demonstration in the centre of Bristol to fight plans to build thousands of new homes on the green belt surrounding the city.... if allowed, it would be just a taste of things to come for other areas... "The (South West Bristol) exhibition that is on here today represents the first phase of the RSS and its intention to rob Bristol of the green belt." Bristol Evening Post on 8th March 2009.

- 2.7 Their key tangible objections set out in their representations to the Ashton Park planning application include:
- Concerns about coalescence of smaller settlements with the urban area of Bristol
 - The inevitable impact of considerably more traffic adding to the already congested Cumberland Basin, with more traffic backing up along the A38 and A370 and spilling over onto local roads and villages.
 - Concerns about the deliverability of transport proposals needed to make the development work.
 - Loss of attractive countryside and urbanisation of views.
 - Implications for increased flooding in Ashton Vale, Long Ashton and Barrow Gurney.

- The extent to which the development will help tackle some of the problems that South Bristol faces (eg lack of job opportunities, low skill levels, raising aspirations) and to what extent will it create problems (eg congestion, attracting investment away from South Bristol, adverse environmental impact).

3.0 ENVIRONMENTAL IMPACT

- 3.1 North Somerset Council commissioned an independent study looking at alternative options for accommodating housing development at South West Bristol entitled 'Alternative Spatial Growth Options Study' (May 2009). The final paragraph on page 8 describes the site as:

“...an area of high quality natural landscape with rolling valleys and ridge lines. It also has numerous constraints including floodplains, areas of high ecological value and landfill sites. In addition, it has a number of major transport routes running east-west across the site thereby creating severance issues”.

- 3.2 This confirms that at a more detailed level of analysis than was undertaken for the RSS, the site has a number of environmental constraints that limit development in this location. They include:

Flood risk

- The north eastern part of the site is designated flood zone 2 and 3.

Landscape

- There are large areas of steeply sloping land within the site. These include the ridge line to the south of Yanley and the northern slopes of Dundry Hill which are particularly sensitive and visually prominent.
- The site is prominent in views from Clifton and Bedminster Down.
- Development in this area will be highly visible affecting the setting and views of the Historic Park and Garden of Ashton Court. The site will also be highly visible from the Grade 1 Listed 15th Century Ashton Court mansion house.
- The site includes several important historic landscapes including land to the south of Bridgwater Road; along the Long Ashton / Barrow Gurney parish boundary; north of the railway of the railway line; and to the South of Long Ashton.

Ecology

- There are a number of ecological constraints. These are mainly found in the north eastern and south western parts of the site and comprise Sites of Nature Conservation Importance (SNCI), Ancient Woodland and UK Priority Habitats BAP.
- There are several important bat routes across the site, with large numbers of bat movements taking place east – west across the site and between Barrow Hospital and Ashton Court estate. Development in this location will have negative impacts on bats, largely as a result
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- of the urbanisation of the site which inevitably changes its landscape character and intensifies the overall light characteristics of the area.

Cultural

- Yanley village (within the site) and parts of Long Ashton (outside of the site) are designated conservation areas and there are a number of listed buildings both within the site and the surrounding area.
- There are several rights of way across the study area, including Monarch's Way which is a long distance footpath of considerable historic importance, dating back to the 1650s. The proposed Ashton Park development will demolish parts of this historic route and divert it to accommodate the western link road proposals.

Transport

- South Bristol already experiences severe congestion on the constrained highway network.
- Additional levels of growth will further add to congestion on strategic transport routes, particularly adding to problems already experienced on the Cumberland basin, but also on many other routes including A370, A38, South Bristol local road network and the B3130 through Barrow Gurney village.

3.3 There are three substantive objections that have been raised by statutory consultees in response to the Ashton Park planning application which raise fundamental questions over the appropriateness of development in this location. They include representations from the Environment Agency, English Heritage and the Highways Agency and are summarised below.

Environment Agency

3.4 Parts of the site are in flood zones 2 and 3. The Environment Agency has raised an objection that the Council does not have an Agency approved Level 2 Strategic Flood Risk Assessment to steer a development of this scale and that evidence needs to be submitted to ensure that the flood risk Sequential Test has been adequately completed. In addition, the Agency notes that the Flood Risk Assessment submitted with the application has not provided a breach analysis for the reservoir located at the upper reaches of the site and therefore has not examined all sources of flood risk.

English Heritage

3.5 English Heritage raises a number of concerns. The most substantive is in relation to the impact of the development on views from Ashton Court Estate, whereby insufficient evidence has been provided to enable them to fully understand the nature and extent of the potential impact on what they describe as one of the most significant structures architecturally and historically in the vicinity of Bristol.

Highways Agency

- 3.6 The Highways Agency issued a Direction of Non-Approval to allow time for the applicant to provide information required for them to take a view on the application. Their main concerns are in relation to inconsistencies in the Transport Assessment (TA) methodology and some of the assumptions that have been made about trip generation (for instance, that the BRT system will uplift travel by public transport by 50% which may be optimistic). In addition, the TA does not examine the impacts on the strategic road network including the M4, M5, M32, M49, A4 and A36. The Highways Agency also point out that the deliverability of the Ashton Park Transport Strategy is very much dependent on the outcome of several Major Scheme Bids for strategic infrastructure for which the outcome is not yet known.

4.0 DELIVERABILITY

- 4.1 Development in this location is dependent on major strategic infrastructure including the South Bristol Link and the Ashton Vale to Temple Meads Bristol Rapid Transit route which have the potential to delay the delivery of this scheme. Both are the subject of major scheme bids to the Department of Transport. All local authority transport bids have been placed in one of four categories - supported, development, pre qualification and longer term pool. The Ashton Vale to Temple Meads Rapid Link is in the development pool while the South Bristol Link is in the pre-qualification pool. A decision on the funding for these schemes is expected at the end of 2011 / early 2012.
- 4.2 If funding is not secured, the delivery of a large scale urban extension in this location is brought into question.
- 4.3 Even if these transport schemes secure the required funding, their construction will not start until 2015 at the earliest and are not expected to be completed until 2016/17.
- 4.4 Baker Associates' representations to the North Somerset Core Strategy Key Changes Consultation (para 4.24) states that the South West Bristol Urban Extension will start to deliver dwellings from 2015 and will consistently deliver 600 dwellings per annum over the remaining 11 years of the plan period (delivering 6,600 dwellings in total). This falls considerably short of the required 10,500 dwellings in this broad location.
- 4.5 It is considered that this delivery rate is overly optimistic, especially given the need for a major new access (the western link) and a significant part of the Yanley Ridge link which will need to be delivered to enable the development in the western part of the scheme. This is based on 8 – 9 developers all averaging 70 dwellings per annum.

- 4.6 By way of comparison, it is worth noting that the South Gloucestershire Local Plan Inquiry looked at anticipated annual build rates associated with the development of 2,000 dwellings at Northfield, Filton, Bristol. The Inspector concluded that an average build rate of 350 dwellings was realistic after an initial lead in time. It is worth noting that the planning application experienced significant delays and subsequent market delays which also need to be taken into account in making assumptions about delivery rates.
- 4.7 It is considered that even if development were to be underway by 2015, and notwithstanding the long term transport infrastructure delivery issues that may prevent the full scale of the development being delivered, a total of 3,850 dwellings could be delivered in this location over the period 2015 – 2026 (based on an average delivery rate of 350 dwellings per annum).