



University of Bristol (Alder King)
ISSUE 3

Prepared by:			
Author	MH	Approved By	NT

Date of Issue:

ALDER KING
Planning Consultants

November 2011

Pembroke House
15 Pembroke Road, BS8 3BA

Our Ref: MH/58174

CONTENTS

1 INTRODUCTION..... 3
2 WEIGHT TO BE AFFORDED POLICY 5
3 GREEN BELT IMPLICATIONS OF THE CORE STRATEGY 7
4 DELETION OF SW BRISTOL URBAN EXTENSION..... 10
5 CONCLUSION..... 11

Appendices

Appendix 1 – Original Representation to Council’s Draft Green Belt Assessment

Appendix 2 – Cooper Partnership Green Belt Assessment of Land Parcel 3

1 INTRODUCTION

1.1 Alder King Planning Consultants have been instructed by the University of Bristol ('the University') to represent their land interests at the forthcoming Examination in Public into North Somerset Council's ('the Council') emerging Core Strategy.

1.2 The University's land interest consists of a 70ha parcel of land located directly adjacent to the town of Long Ashton. Whilst Long Ashton is located within the administrative boundary of North Somerset, the settlement maintains a close functional relationship with the City of Bristol due its close proximity. A planning application concerning the land is currently pending consideration with the Council, and which proposes 1,000 residential units, 12,000m² of B1 employment land, safeguarded land for a new primary school and rail halt, recreational playing fields, community uses and associated infrastructure.

1.3 The University recognise the sensitivity of the proposals as the land is currently designated as Green Belt. However its proposals are considered to have been carefully conceived against the context of the extant RSS (RPG10), the draft SWRSS and also the identified need for significant housing growth across the West of England Housing Market Area (HMA), in such a way as to integrate well with the existing town of Long Ashton.

1.4 Our headline arguments are summarised as follows:

- **The extant regional tier of the development plan (RPG10) advocates the need for major development to be focused at Primary Urban Areas (PUAs), followed by urban extensions to**
-

PUAs. The Core Strategy must maintain general conformity with RPG10.

- The need for urban extensions to accommodate the current demand for housing was reinforced by the draft SWRSS, which was at an advanced stage of preparation and therefore benefits from substantial weight as a material planning consideration. The weight to be afforded the draft SWRSS is further substantiated by the extensive evidence underpinning a demand for housing which is well in excess of what the Council are currently proposing.**
 - By adhering to their principle of no SW Bristol urban extension, the Council are failing to satisfy the growth requirements of the HMA, and Bristol in particular. Therefore the Core Strategy spatial strategy is flawed.**
 - Due to the Council's unyielding commitment to the principle of 'Green Belt protection' they are unable to identify a sufficient supply of land to meet the needs of the HMA. The Cooper Partnership study has identified land which could be removed from the Green Belt at Long Ashton without detriment to the function of the Green Belt in this part of SW Bristol in order to accommodate much needed housing.**
 - The deletion of the south west Bristol urban extension will result in a significant shortfall in housing delivery. As a result, unsustainable commuter patterns will be created throughout the wider HMA, by virtue of individuals being forced to live further away from the economic hub of the sub region – Bristol.**
-

-
- 1.5 The arguments underpinning the above headline statements are explored in more detail below.

2 WEIGHT TO BE AFFORDED POLICY

- 2.1 The established spatial strategy at the core of regional policy is the hierarchical approach to the location of new development. This approach seeks to focus new development at those existing sustainable locations which are well provided for in terms of services, housing, employment opportunities and public transport facilities.

- 2.2 With respect the extant RSS (RPG10), under the provision of Policy SS 2: Regional Development Strategy, Local Planning Authorities are required to focus the majority of development at Primary Urban Areas (PUAs). Where this is not possible, the policy requires that development take the form of planned urban extensions to the PUA in sustainable locations with good access to the urban area by public transport, cycle and pedestrian routes. Following the PUA, development should then be focused at other, smaller settlements on a scale commensurate to service provision within those locations.

- 2.3 This spatial approach was maintained within the draft SWRSS which sought to deliver the majority of new development at the Strategically Significant Cities and Towns (formerly PUAs), followed by market towns and then finally small town and villages (Development Policies A – C). This hierarchical approach was endorsed by the EiP Panel, *'This increased focus on urban development reflects a now well-established trend in national planning guidance'* (Panel Report, para 3.17).

- 2.4 There has been no shift in national planning policy with respect to the settlement led approach to the location of new development advocated to
-

locating new development (including guidance contained with the draft National Planning Policy Framework). Furthermore, the spatial strategy underpinning the SWRSS has already been subject to extensive review during the SWRSS EiP, and found to be acceptable by both the Panel, and subsequently by the Secretary of State.

2.5 Having regard to the most recent Cala home judgement, as the draft SWRSS was at an advanced stage of preparation it is considered to benefit from considerable weight as a material planning consideration, and therefore the Council's Core Strategy must maintain general conformity.

2.6 As outlined in our Position Statement concerning Issues 1 and 2, the Council have failed to make sufficient provision for housing demand during the plan period and are instead maintaining an insular approach to the delivery of new housing, having regard only to the needs of North Somerset and not the wider Housing Market Area (HMA). Our previous Position Statement demonstrates that to maintain an employment led strategy to housing delivery; the Core Strategy would need to provide a minimum of 23,200 houses during the plan period. On the basis that these additional dwellings (9,200) cannot be delivered in existing settlements within the district (as demonstrated by the Council's SHLAA) this additional development would need to be delivered as a sustainable urban extension, to South West Bristol. This would meet the acknowledged needs of the HMA and accord with the policy basis of both the extant RSS and draft SWRSS.

2.7 ***Therefore in the face of significant housing demand, and having regard to the established spatial strategy, this additional housing demand should be provided by an urban extension at SW Bristol. As the Core Strategy is failing to accommodate the SW Bristol urban extension, its spatial strategy is flawed.***

3 GREEN BELT IMPLICATIONS OF THE CORE STRATEGY

- 3.1 When considering the potential for Green Belt land to be used to accommodate development (in particular urban extensions), the SWRSS Panel were required to demonstrate the very special circumstances necessary to justify the release of Green Belt land. On this matter, the Panel confirmed that they had, *'considered the opportunities for further development within the urban areas defined by the approved Green Belts in the region. While we have identified limited additional opportunities in a few locations, we are of the opinion that further land will be required to meet the increased level of demand...We conclude that the scale of demand and the application of the principles of a Sustainable Future for the South West as set out in Policies SD1 – 4 provide the exceptional circumstances to justify the alterations to the Green Belts within the region'* (SWRSS Panel Report, para 4.0.32).
- 3.2 As demonstrated in our previous Position Statement, the Council are proposing a woefully inadequate supply of housing which if allowed, would have severe sustainability implications for the wider HMA. Therefore we have suggested that the housing targets should be increased to a minimum of 23,200 units if delivery is to satisfy latent population pressures and ensure sustained economic growth. Allowing for completions (4,950 from 2006 - 2011), the Council have confirmed in their SHLAA that there is a residual capacity to accommodate 7,361 dwellings in locations which are broadly consistent with the policy objectives of the Core Strategy.
-

-
- 3.3 Therefore there will be a shortfall of land to accommodate approximately 10,800 additional units if latent demographic demand, and employment led growth is to occur. This level of demand is similar to that considered by the SWRSS Panel to warrant the very special circumstances to justify re-defining Green Belt boundaries (in accordance with PPG2 para 2.7) and this approach needs to be maintained within the Core Strategy.
- 3.4 We therefore consider that the very special circumstances exist to re-define Green Belt boundaries. However the Council has taken a firm stance in its draft Core Strategy, doggedly adhering to the following key principles:
- a) The Green Belt will be protected;
 - b) There will be no development at South West Bristol;
 - c) The strategic focus for employment-led regeneration in the District will be Weston-super-Mare, but with the scale and form of development re-assessed' (SD/19, para 2.4).
- 3.5 Whilst the Council maintain the above position, no robust assessment of the Green Belt has been undertaken to determine whether parcels of land are still maintaining Green Belt function. Whilst the Council have undertaken a draft Green Belt Assessment (SD/50), this was inherently flawed on the basis that the starting point of the assessment was the assumption that as the land was designated as Green Belt, it was still performing the function of Green Belt. To quote: *'It is worth re-emphasising that the land at south west Bristol has been designated because it **does** perform the Green Belt functions identified in PPG2. This assessment merely identifies how well each of the parcels performs relative to each other'* (SD/50, para 17). A representation containing a detailed critique of SD/50 has already been submitted to the Council and this is enclosed at **Appendix 1**.
-

-
- 3.6 The draft National Planning Policy Framework (DNPPF) makes it clear that. *'The appropriateness of existing Green Belt boundaries should only be considered when a Local Plan is being prepared or reviewed'* (DNPPF, para, 138). On this basis, a failure by the Council to undertake a robust assessment of the Green Belt could result in missed opportunities to deliver additional housing, which would have severe ramifications for the sustainability objectives of the wider HMA and also the Core Strategy.
- 3.7 This scenario has been evidenced by the Cooper Partnership (CP) who have undertaken an independent assessment of the University's land (draft Green Belt Assessment – Parcel 3). The full assessment can be viewed at **Appendix 2**.
- 3.8 In respect of Parcel 3, the Council concluded that the land, whilst not as important as other Green Belt parcels, still carried out Green Belt functions and should therefore be retained as Green Belt. This recommendation is completely at odds with the findings of CP, who, having regard to the objectives of PPG2, confirmed that Parcel 3:
- Provides no contribution to historic settlements or character;
 - Is not necessary to prevent coalescence;
 - Has strong landscape boundaries to contain development and prevent sprawl;
 - Does not perform the functions required of a Green Belt.
- 3.9 The JC assessment concluded that the land, *'should be removed from the Green Belt to contribute to the housing numbers for the Core Strategy'* (CP Statement, para 1.9). In this instance the Council have overlooked the opportunity to deliver a significant housing allocation which would make a valuable contribution towards the delivery of the housing target identified in paragraph 2.6 above.
-

-
- 3.10 ***On the basis that Green Belt boundaries should be reviewed at the plan making stage, it is imperative that a robust Green Belt Assessment is undertaken now, as there is a critical need for Green Belt land to be released to accommodate the growth requirements of the HMA as an urban extension to SW Bristol.***

4 DELETION OF SW BRISTOL URBAN EXTENSION

- 4.1 It has been demonstrated that there is a need for significant additional housing (9,200 homes), well in excess of the quantum currently being proposed by the Council. The Council's SHLAA does not identify sufficient land to accommodate these additional units, therefore it is critical for land to be released from the Green Belt to accommodate growth.
- 4.2 The development plan (which includes extant RPG10) maintains a settlement led strategy in respect of the location of new development, which seeks to focus development at PUAs followed by urban extensions to PUAs. This approach was refined further by the draft SWRSS which required an urban extension at south west Bristol.
- 4.3 Deletion of the South West Bristol Urban Extension would result in a massive undersupply in housing, resulting in constricted economic growth within North Somerset and the city region. This would have severe ramifications in terms of the competitiveness of the West of England as a sub region. Furthermore, the failure to provide sufficient housing is likely to increase levels of in-commuting by those individuals required to work in Bristol but who are forced to live further afield, resulting in obvious environmental and sustainability impacts, which is contrary to the sustainability aspirations of both North Somerset and the other West of England authorities.
-

-
- 4.4 It should be noted that the SW Bristol urban extension was also to provide a significant proportion of new employment development. This delivery would help address the historic imbalance of excessive growth within Bristol's north fringe. Furthermore, the SW Bristol urban extension would help provide the necessary private sector investment to pump prime much needed regeneration into SW Bristol, and also help fund major infrastructure projects such as the South Bristol Ring Road and Bus Rapid Transit System.

5 CONCLUSION

- 5.1 The extant RSS (RPG10) confirms a spatial strategy that requires major development to be focused at PUAs, either within the urban area or as planned urban extensions. This approach was taken further by the draft SWRSS which identified a need for significant housing to meet the needs of the HMA, and which due to limitations on urban capacity, needs to be delivered by urban extensions.
- 5.2 The Courts, in their consideration of the CALA Homes case have confirmed that the Government's intention to abolish regional strategies is not a material consideration. Therefore, Core Strategies must be in general conformity with regional strategies. Furthermore, we agree with the Inspector's comments in document ED/04 that as the draft SWRSS was at an advanced stage of preparation, it benefits from substantial weight as a material consideration. It is considered that this weight can only be diminished if local authorities can demonstrate an evidence base structured against more recent circumstances that outweigh the policy basis of the draft SWRSS.
- 5.3 It has been demonstrated in our previous Position Statement that the Council's evidence base in respect of housing targets is critically flawed,
-

and there is a need for significantly higher rates of housing delivery to those currently proposed by the Council. In their SHLAA, the Council have confirmed that they would be unable to identify sufficient land outside of the Green Belt to meet this need, therefore Green Belt boundaries will need to be re-defined. The SWRSS Panel have already acknowledged that housing demand constitutes the very special circumstances to justify the re-defining of Green Belt boundaries and it is considered that this approach still holds weight.

- 5.4 Failure by the Council to undertake a robust Green Belt assessment and acknowledge the need for a SW Bristol urban extension will result in a flawed spatial strategy which will have severe implications for the growth requirements of Bristol and the sustainability objectives of the wider HMA.

- 5.5 The University's 70ha site at Long Ashton can provide approximately 1000 new homes in a highly sustainable location, allowing integration with the existing village and the addition of much needed educational, community and recreational facilities – without detriment to Green Belt objectives.