

# South Gloucestershire Council New Local Plan Site Submission Form



## GUIDANCE ON COMPLETING THIS FORM

Please return this form if you are suggesting a site to be considered in the New South Gloucestershire Local Plan. Previously submitted sites are available to view on an online map at: [www.southglos.gov.uk/callforsites](http://www.southglos.gov.uk/callforsites)

**For each site please complete a separate form and provide a map that clearly and accurately identifies the site boundary.**

Completed forms and site location plans should be emailed to: [PlanningPolicy@southglos.gov.uk](mailto:PlanningPolicy@southglos.gov.uk).

**Identifying a potential site does not infer that the council in any way supports the development of the site. Sites will be assessed through the plan making process and will be subject to normal planning procedures.**

Data Protection Statement: This information is collected by Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council as data controller 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, to contact you, if necessary, regarding the answers given on this form, and to keep you informed of progress with plan making. Some of the data relating to specific sites will 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 form, in accordance with the Freedom of Information Act 2000.

### 1. HAS THE SITE PREVIOUSLY BEEN SUBMITTED TO THE COUNCIL?

Previously submitted sites are available to view on the online map accessible from: [www.southglos.gov.uk/callforsites](http://www.southglos.gov.uk/callforsites) (Click on the site to see the site reference number and information previously submitted).

		<b>Please enter the relevant Site Reference number from <a href="http://www.southglos.gov.uk/callforsites">www.southglos.gov.uk/callforsites</a></b>
Has this site previously been submitted?	Yes / No	JSP Emerging Spatial Strategy (Awaiting ref No.) JSP Issues & Options (2016) SGJSPIO020 JSP Call for Sites (2015) SG000106 PSP Reg 18 Consult PSP009 PSP Call for Sites CFS008 SHLAA084

If the site has already been submitted, how does the information provided in this form change the information you have previously provided to us?

Reiterates information previously submitted as part of the above consultations.

## 2. YOUR DETAILS

Name

Peter Roberts

Company/Organisation  
(if applicable)

Barton Willmore

Address

101 Victoria Street, Bristol BS1 6PU

Telephone

01179 299677

Email

[REDACTED]

Status (please tick all that apply)

Owner of (all or part of) the site  Land Agent   
Planning Consultant  Developer   
Amenity/ Community Group  Local Resident   
Registered Social Housing Provider   
Other (please specify)

[REDACTED]

If acting on behalf of  
Landowner / developer  
please provide client name  
and address details:

Mr A D England

I (or my client)...

Is sole owner of the site  Owns part of the site   
Do not own (or hold any legal interest in) the site whatsoever

If Owner/Part Owner, have  
you attached a title plan and  
deeds with this form?

Yes  No

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

Joint owner of the site

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

Yes  No

### 3. SITE DETAILS

Site Address (including postcode where applicable)

Land South of Gloucester Road, Almondsbury.

Site Area (Hectares)(if known)

Circa 16ha. Please see location plan within attached representation.

Current land use(s)

Agricultural.

Adjacent land use(s)

Residential, Agricultural and Motorway.

Relevant planning history (if known)

None.

Please tick box to confirm you have provided a site plan [ ]

### 4. POTENTIAL USES & CAPACITY

Suggested uses (please tick all that apply and where mixed use indicate % of overall site for each use)

USE		Capacity (number of units) and indication of possible residential tenures, types and housing for different groups
Residential	Yes/No	Up to 500 units.

USE		Floorspace (m <sup>2</sup> ) / number of floors/pitches / notes
Office, research & development, light industrial (B1)	Yes/No	
General industrial (B2) / warehousing (B8)	Yes/No	
Sports / leisure (please specify)	Yes/No	
Retail	Yes/No	
Gypsy and Travellers / Travelling Showpeople sites	Yes/No	
Other (please specify)	Yes/No	

Additional notes about potential uses:

The site has the flexibility to accommodate additional and complementary uses to the residential proposed.

## 5. SITE SUITABILITY ISSUES

Question		Further details including details of further studies undertaken / mitigation proposed
Does the site have any physical constraints (e.g. topography, access, severe slope, vegetation cover etc.)?	Yes/No	
Is the site subject to flooding?	Yes/No	
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	Yes/No	M4 motorway at lower level to the east beyond extensive landscape buffer. M5 motorway beyond adjacent fields to the south. A noise assessment has been undertaken which demonstrates that this does not constrain the development of the site.
Is there a possibility that the site is contaminated?	Yes/No	The site comprises agricultural fields. Inspection of historic mapping dating back to 1886 provides no evidence of built development. It is therefore considered unlikely that the site is contaminated.
Can satisfactory vehicular access to the site be achieved?	Yes/No	
Has the Highways Agency been consulted?	Yes / No	
Is the site subject to any other key constraints?	Yes/No	The site is however in the green belt. Extremely limited contribution as assessed within supporting documentation.

### UTILITIES / INFRASTRUCTURE PROVISION

Please tell us which of the following utilities are available to the site

Mains water supply  Mains sewerage   
 Electrical supply  Gas supply   
 Landline telephone  Broadband internet   
 Other (please specify below)

Please provide any other relevant information relating to site suitability issues:

## 6. SITE AVAILABILITY ISSUES

Question		Comments/further details
Are there any legal/ownership constraints on the site that might prohibit or delay development of the site (e.g. ransom strip/covenants)?	Yes/No	
Must land off-site be acquired to develop the site?	Yes/No	
Are there any current uses which need to be relocated?	Yes/No	
Is the site owned by a developer or is the owner willing to sell?		The owner is keen to see the site developed.

**Estimated delivery rate:** When do you think the site would come forward for development? (Where a development will be phased over more than one period please indicate this)

Within the next 5 years	6-10 years	11-20 years
X	X	

Do you have any information to support when the site will come forward and its phasing? Please consider suitability, achievability and constraints.

The site does not have planning permission but has no overriding constraints and provides great flexibility for non-strategic growth in the short term, as well as larger strategic growth as part of a longer term phased approach.

## 7. SITE ACHIEVABILITY ISSUES

Question		Comments/further details
Are there any known significant abnormal development costs (e.g. contamination remediation, demolition, access etc.)? If yes, please specify.	Yes/No	
Does the site require significant new infrastructure investment to be suitable for development? If yes, please specify.	Yes/No	
Are there any issues that may influence the economic viability, delivery rates or timing of the development? If yes, please specify.	Yes/No	
Has a viability assessment / financial appraisal of the scheme been undertaken?	Yes/No	
Have any design work studies been undertaken?	Yes/No	Indicative concept plans within the accompanying supporting documentation.

## 8. ADDITIONAL COMMENTS

If necessary, please continue on a separate sheet and attach to this form.

Please see accompanying supporting documentation.

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# Land South of Gloucester Road, Cope Park and Crantock Drive and west of the M4, Almondsbury

South Gloucestershire Local Plan (2018-2036)

For Mr A D England

February 2017

**Land South of Gloucester Road, Cope Park and Crantock Drive and west  
of the M4, Almondsbury**

**South Gloucestershire Local Plan (2018-2036)**

**For Mr A D England**

<b>Project Ref:</b>	23335/A3/SE/jmm	23335/A3/SE/jmm	
<b>Status:</b>	Draft	FINAL	
<b>Doc:</b>			
<b>Date:</b>	22 <sup>nd</sup> February 2017	23 <sup>rd</sup> February 2017	
<b>Prepared by:</b>	Simon Ellinger	Simon Ellinger	
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Ref: 23335/A3/SE/jmm

Date: February 2017

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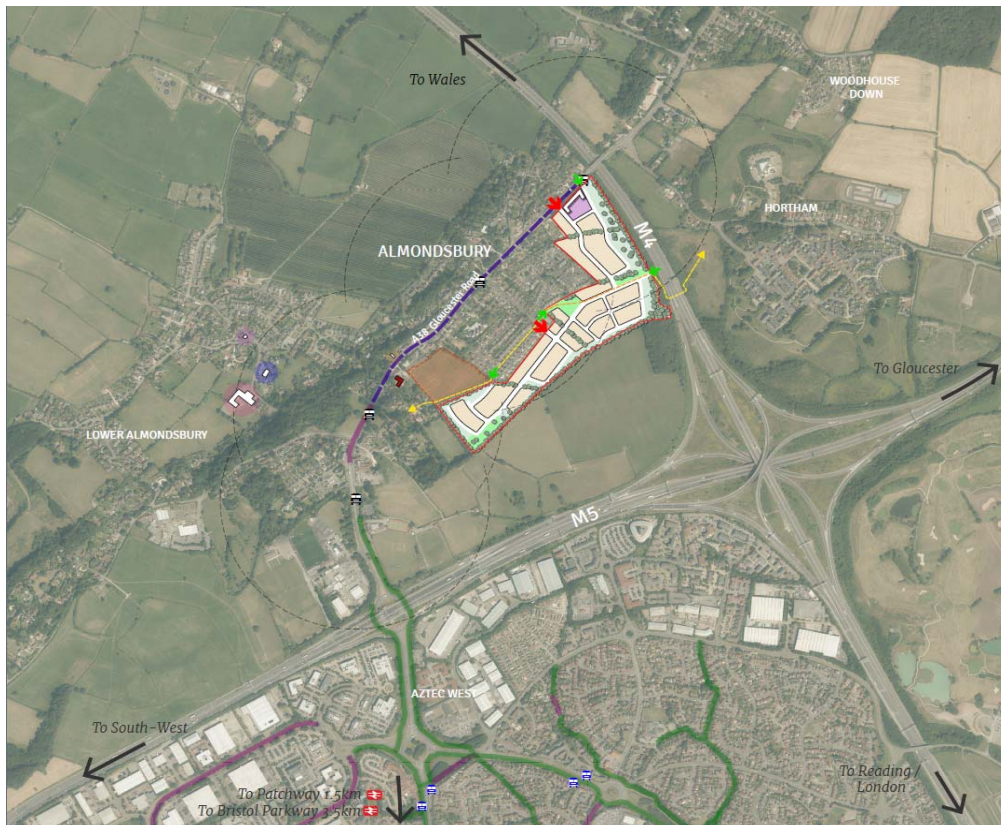
## 1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Mr A D England who owns circa 16ha of land south of Gloucester Road, Almondsbury as shown on the site location plan and concept scheme below.
- 1.2 This site has been promoted through the Core Strategy, Policy Sites and Places (PSP) Plan and most recently through the higher level Joint Spatial Plan. This representation should be read in conjunction with the accompanying completed Call for Sites response form, promotional document (Appendix 1), and the previous comprehensive representation submitted in response to the JSP Emerging Spatial Strategy in December 2016 (Appendix 2).
- 1.3 The main focus of these representations is to highlight the opportunity available through land south of Gloucester Road, Almondsbury, however we also briefly touch on the key issues relating to the current consultation document.
- 1.4 The intention of this representation is to summarise and not replicate information previously submitted through recent plan making processes and contained within the accompanying supporting documentation. Our client's site is being promoted as a flexible opportunity for the development of circa 400-500 homes. Whilst we recognise that it is not a strategic site for the purposes of the JSP, we believe that the site performs well when assessed against key sustainability criteria and makes little contribution to Green Belt purposes. Therefore, provision should be made for its allocation through the JSP (as part of a larger allocation for Almondsbury) and by way of identification of the area to be removed from the Green Belt and allocated in the South Gloucestershire Local Plan.

### Site Location



### Concept scheme

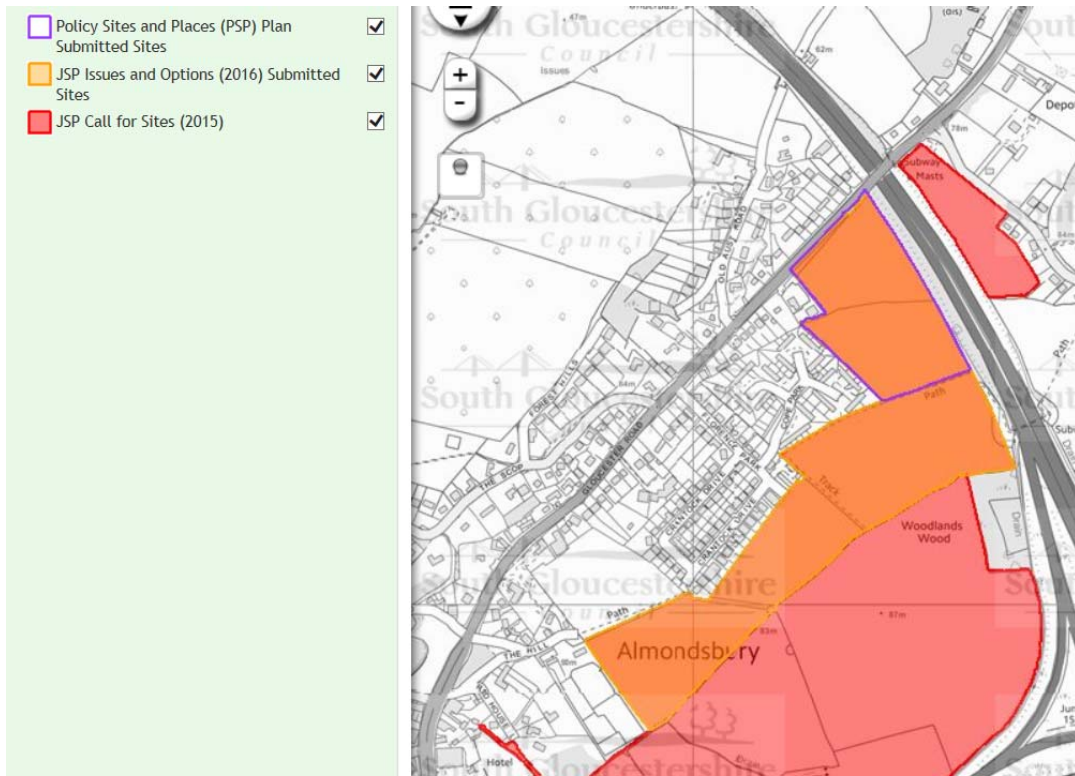


## 2.0 THE SITE

- 2.1 The site comprises 5 separate fields lying between the existing southern and eastern settlement boundary of Almondsbury and the M4 motorway. The combined site area is approximately 15.6ha. The field boundaries are defined by hedgerows interspersed with trees. The unique topography, along with a thick belt of planting, prevents views of the site from the M4 motorway to the east of the site and the M5 motorway, which lies beyond fields to the south.
- 2.2 The land is relatively flat, rising slightly in the western part of the site. A public footpath runs along the northern boundary of the south-easternmost field. The north-westernmost field lies to the south of playing fields. To the north of the site is a mid twentieth century residential area which comprises houses on Florence Park, Crantock Drive and Cope Park. There are existing gated accesses to the site from Gloucester Road and Florence Park.
- 2.3 The site lies within the Green Belt, which surrounds and 'washes-over' Almondsbury. The site lies in flood zone 1 (low probability) and, save for its Green Belt designation, is not subject to any landscape or other designations.
- 2.4 Searches of South Gloucestershire Council's online planning records have revealed no relevant planning history for the site.

### 3.0 CALL FOR SITES MAPPING

- 3.1 We would like to take this opportunity to clarify a potential error with the associated Call for Sites mapping in respect of our client's land. The mapping currently indicates that the entirety of our client's land was submitted as part of both the JSP Call for Sites (2015) and the JSP Issues and Options (2016) consultations, but that only part of the land was submitted to the Policy Sites and Places (PSP) Plan.
- 3.2 This, we feel, is slightly misleading. The entirety of Land South of Gloucester Road has been promoted through all of the recent consultation processes including the PSP. The whole of the site was included within the original PSP Call for Sites consultation that took place around February 2014 (Ref: CFS008 SHLAA 084). It was only in a subsequent request for smaller quickly developable sites in December 2015 that a smaller area incorporating two fields immediately adjacent to the A38 were submitted (Ref: PSP009). The mapping should show the full extent of the land as being promoted to the PSP Plan.
- 3.3 The extent of the land promoted previously does not necessarily mean that the entirety of the land would need to be allocated for development. The site is able to be developed in part or phased if required in order to meet the level of housing need identified for Almondsbury.
- 3.4 Whilst we consider this to be an unintentional error, we would nevertheless respectfully request that this be updated to accurately reflect the promotional history of the site. We include an extract of the Call for Sites mapping below for your reference.



Call for Sites Mapping extract

## 4.0 CONTEXT AND OVERVIEW

- 4.1 The latest iteration of the JSP, The Emerging Spatial Strategy, considers Almondsbury to be an unsuitable location for major strategic growth (over 500 units). It does however, consider that Almondsbury may have potential for non-strategic growth and this is a view that we fully support.
- 4.2 The principal constraint affecting the site is its location within the Green Belt. The Green Belt around Almondsbury generally was considered as part of the Strategic Green Belt Assessment 2011 and the South Gloucestershire Green Belt Assessment 2006, both of which formed part of the evidence base for the Core Strategy. Both documents identified the Green Belt around Almondsbury in general as contributing to Green Belt objectives. However, neither document was fine-grained enough in its analysis to consider the specific contribution of the Gloucester Road site itself to Green Belt objectives.
- 4.3 In preparing the JSP a Green Belt Assessment has been undertaken, however, our representation to the Emerging Spatial Strategy in December 2016 highlighted the flawed method of reviewing larger areas as a whole. Whilst it is accepted that assessing individual sites may not be practical at a strategic level, it would ensure that one site is not 'tarred with the same brush' simply by its physical proximity areas with a greater impact. Unfortunately Land South of Gloucester Road, Almondsbury has been a victim of this approach. A more in depth analysis of this site's contribution is contained at Appendix 2. In summary, it concludes that our client's site actually provides **Limited Contribution** to Green Belt purposes. As the new Local Plan will seek to allocate both strategic and non-strategic sites, it will therefore be essential for a more fine grained Green Belt assessment to be carried out as part of the Local Plan making process.
- 4.4 This previous representation goes on to outline the supporting justification for residential development in this location with a particular focus on sustainability – a golden thread running through the NPPF.
- 4.5 Almondsbury Parish had a 2011 population of 4,705. The village has a primary school, a public house, community hall, GPs' surgery, and a community shop. The site lies approximately 1.2 miles from the Aztec West employment area and 3.3 miles from Patchway Railway Station. The promotional document submitted alongside this representation demonstrates the existing pedestrian and cycle routes that provide unrestricted access to the North Fringe and beyond.

- 4.6 The South Gloucestershire Council 'Community Profiles' document (undated) which formed part of the Core Strategy evidence base, identified Almondsbury as having "Good public transport provision" with "Easy access to the north fringe of Bristol". Furthermore, the Rural Settlement and Villages 2015 Topic Paper- Sustainable Access to Key Services and Facilities & Demographic Information document (November 2015) scored Almondsbury 27 out of 40 and having "Good Access" to Services and Facilities.

**"Settlements have a balanced range of services and facilities within walking and cycling distance, for some settlements this will include health care facilities. Some settlements have access to multiple retail, food shops or major employers. Settlement likely to have access to broadband and good public transport links to a major centre. Some settlements lack good walking and cycling access to one particular type of facility or service, often local shops (non-food) or permanent library".**

- 4.7 An extract from the Rural Settlement and Villages 2015 Topic Paper- Sustainable Access to Key Services and Facilities & Demographic Information document (November 2015) is included at Appendix 3.
- 4.8 One must also consider the site within the context of proposals coming forward as part of the emerging Joint Transport Plan (JTP) which highlights the strategic location of the site in relation to the transport vision for this locality and the West of England region. Whilst indicative at this stage, it would appear that the main Aztec roundabout on Gloucester Road will act as a key transport hub for MetroBus, proposed Light Rapid Transit (LRT) and Strategic cycle routes.
- 4.9 These improvements will be complimented by an extension of MetroBus to Thornbury, along a transport corridor that directly adjoins the northern boundary of the site, and to where existing bus stops could be integrated. Whilst the M5 Motorway could be considered a visual barrier, there is existing unrestricted pedestrian and cycle access to the North Fringe and beyond. The proposed extension of the Strategic cycle route throughout the village and up to Thornbury will further enhance Almondsbury as a location for sustainable development.
- 4.10 In summary, the site benefits from access to local facilities and services, good public transport accessibility, and close proximity to the major employment areas of the north fringe of Bristol and Cribbs Causeway. The proximity of the site to principal employment centres means that it is a logical location for providing new homes without encouraging long distance commuting by car. Future proposals coming forward as part of the Joint



Transport Plan (JTP) as outlined above, will only seek to further enhance the suitability of the site and cement this location as a highly sustainable location for future development.

- 4.11 Development of the site could support the realisation of some of the proposed community aspirations mentioned in the Draft Policy, Sites & Place Plan (June 2014) such as increased capacity at Almondsbury School, provision of a village shop/post office and provision of new playing fields/green spaces.



## 5.0 COMMENTS ON LOCAL PLAN PROSPECTUS

- 5.1 Our key concern regarding the current version of the Local Plan prospectus is that the level of economic ambition proposed in the Plan fails to acknowledge and reflect that of the JSP. As such, we are concerned that the plan will not be an effective tool in delivering the strategy promoted through the JSP. The vision for the JSP states:

**“By 2036 the West of England will be one of Europe’s fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all.”**

- 5.2 The Local Plan prospectus seeks only to maintain the economic prosperity of the Region. This miss-match needs to be addressed within future iterations of the plan.
- 5.3 Linked to this, we are concerned that the Plan period of the Local Plan is inconsistent with the JSP. The JSP provides a plan for the period 2016 – 2036, whereas the Local Plan seeks only to cover the period from 2018 – 2036. Whilst this may reflect the end date, it potentially removes two years of higher housing requirement from being addressed by the Plan. This will only serve to reduce the number of homes delivered by the Plan and exacerbate under provision of housing and affordability issues.
- 5.4 Furthermore there is a need for South Gloucestershire within this new Plan to address issues of under provision caused by a constrained supply of housing. Whilst undoubtedly Strategic Sites play a crucial role in the delivery of housing and meeting housing need over the Plan period, the Core Strategy is evidence of the fact that such sites take a long time to deliver housing. To address this issue the Plan must include a significant supply of smaller and immediately available sites to ensure that the level of housing need established through the JSP can be met. This also means not just planning for the lowest housing requirement but allocating contingency sites in order to provide sufficient flexibility within the Plan to achieve the required level of housing. As well as the allocation of additional land to provide a buffer of deliverable sites, we also suggest that a policy should be incorporated to provide guidance as to how the Council will deal positively with applications for housing in the event that the rates of housing delivery fall short of the requirement.

## 6.0 CONCLUSION

- 6.1 We wholeheartedly support the preparation of the South Gloucestershire Local Plan 2018-2036 alongside the Joint Spatial Plan as this represents a joined up approach to addressing strategic issues, delivered locally. However, we reiterate our previous concerns that the JSP is simply not planning for enough housing over the plan period and as a result, we believe that proper flexibility will need to be integrated within the SGLP.
- 6.2 This site represents an opportunity for an extension to the village of Almondsbury which could be achieved without compromising Green Belt objectives. The site could provide new homes in a sustainable location, which would support the vitality of Almondsbury and its local services, while allowing easy access to the facilities and employment opportunities in the north fringe of Bristol.
- 6.3 Sites of this nature, which can be brought forward quickly as non-strategic sites in the short term, whilst having the long term capacity to offer larger strategic growth also offer a sustainable solution to meeting the suppressed housing need for the district. Given the council's historical problems with delivery, it is considered that the flexibility (in that it can be delivered in whole or part) should not be overlooked.
- 6.4 Whilst we continue to support this site as an area for strategic growth of circa 400-500 homes through the JSP plan making process, the Emerging Spatial Strategy makes reference to non-strategic growth in this location being more appropriate. Should this site not be allocated for strategic growth as part of the JSP, the site should be removed from the Green Belt as part of the SGLP plan making process and allocated for non-strategic housing development.

**APPENDIX 1**  
**ALMONDSBURY JSP**  
**PROMOTION DOCUMENT**

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West of England Joint Spatial Plan **2016**

# **Land South of Gloucester Road, Almondsbury**

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*Appendix:*

1 / Site location plan

2 / Technical report on noise prepared by Sharps Acoustics LLP

# Introduction

This document provides information in support of the suitability of land south of the Gloucester Road, Almondsbury (Land at Almondsbury) as an option for accommodating growth in the West of England up to 2036. It is prepared on behalf of the England family who own 16 hectares of agricultural land lying to the south of the A38 Gloucester Road and west of the M4 in Almondsbury (see OS site plan at Appendix 1 to this document).

This document provides initial masterplan concepts for the development of Land at Almondsbury. It then explains how that development would contribute to the achievement of the spatial objectives set out in the West of England Joint Spatial Plan Issues and Options consultation document.

## Aerial Plan



# Executive Summary

This document demonstrates that Land at Almondsbury is a sustainable location for residential development with the following key advantages:

- It allows people to live locally in close proximity to employment in the Bristol north fringe, reducing travel.
- Almondsbury is a vibrant village with a range of services and facilities within short walking and cycling distance. The development can enhance the village by providing public open space and employment and/or retail uses.
- It has good existing public transport, walking and cycling links, with clear and achievable opportunities for future improvements along the A38 corridor.
- The landowners are local people who are committed to creating a successful community and willing to take a flexible approach. This would include providing a range of housing types and tenures, and could include a significant proportion of self/custom build.
- The site is visually contained and could be developed with minimal harm to the Green Belt. There are no landscape, ecology, flooding, transport, heritage or other environmental constraints to development.

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# Initial masterplan concepts

Initial conceptual master-planning work has been informed by a detailed analysis of constraints and opportunities. A constraints and opportunities plan appears below.

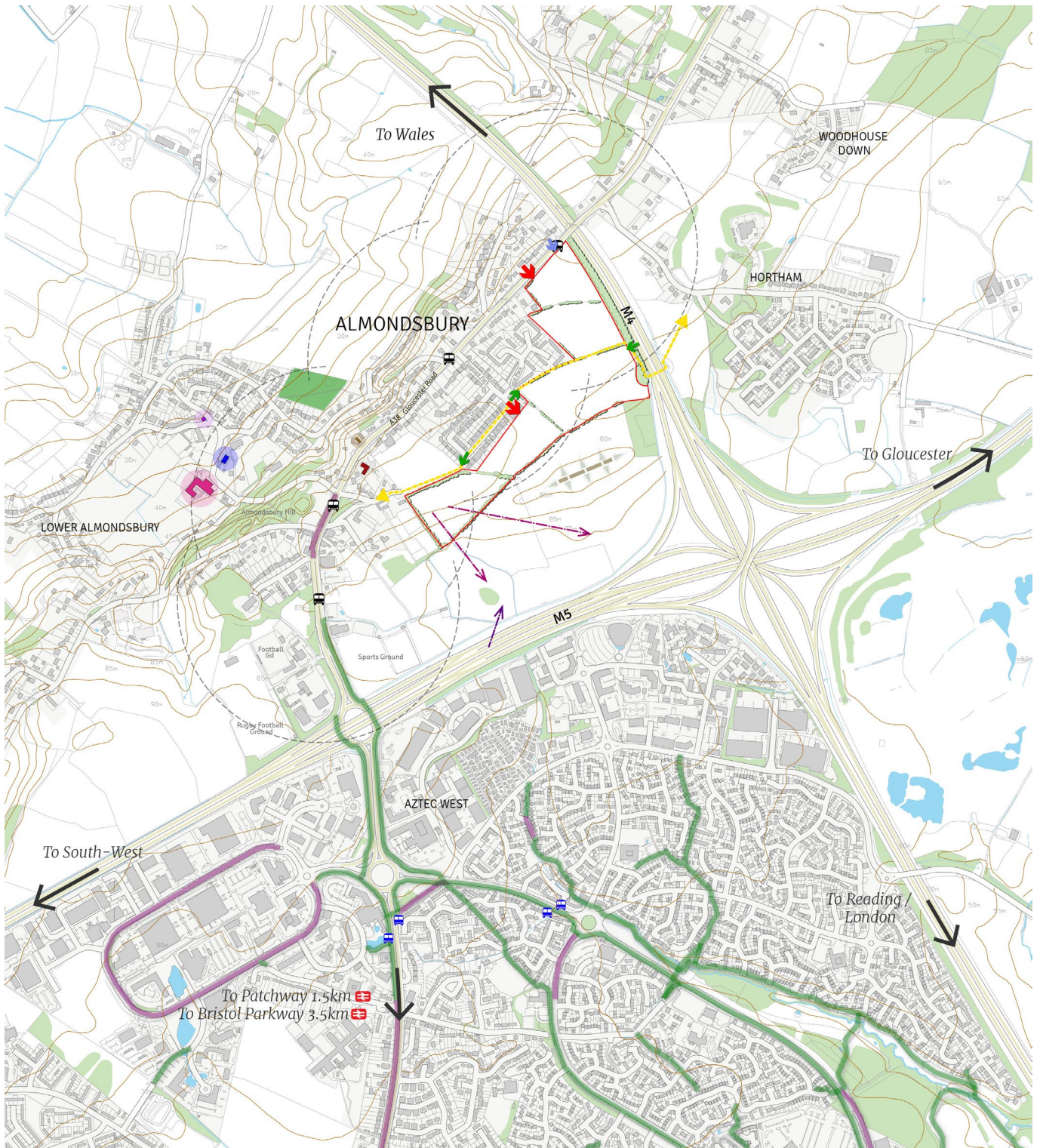
The masterplan concept proposes the following:

- Around 500 new homes comprising a mix of sizes and tenures and potentially incorporating a significant proportion of self/custom build.
- Public open space – we would be guided by community aspirations in how this should be provided.
- Reinforcement to existing hedgerows to the south and east to increase visual containment.
- A legible, permeable layout prioritising pedestrian and cycle links.
- A mixed-use element, most likely on the Gloucester Road frontage, which could comprise flexible live-work or start-up units and/or retail units.

We have also shown on the concept masterplan adjacent land owned by a local charitable trust which could be accessed from Land at Almondsbury subject to the trust's approval.



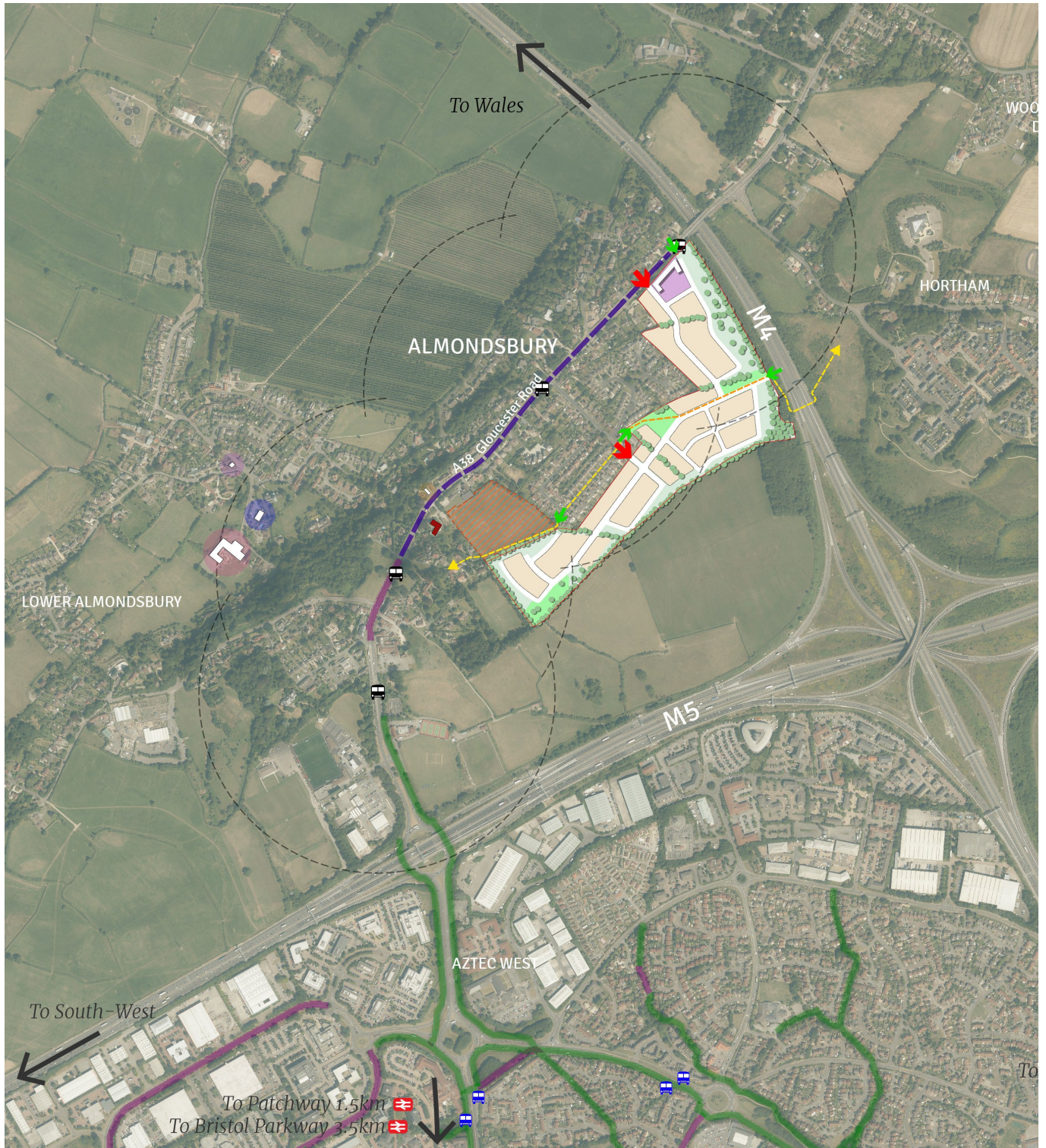
Constraints & Opportunities Plan



Site Boundary	Approximate Ridgeline	Listed Buildings near site	Views in to site
Woodland	Potential Vehicle Access	Almondsbury Community Shop	A38 Bus Stops with 400m catchment
Primary Roads	Existing Pedestrian Access	Public House	Planned MetroBus Stops
PROW passing through site	Potential Pedestrian Access	Almondsbury Surgery	Cycle Paths
Contours	Almondsbury CoE V.C. Primary School	Views out of site	Public Playing Field



Concept Masterplan



- |   |  |                                     |                                   |
|---|--|-------------------------------------|-----------------------------------|
| Site Boundary   | Existing PROW connected to diverted path | Indicative Trees                    | A38 Bus Stops with 400m catchment |
| Potential Additional Site Area (subject to owners' agreement) | Indicative Residential                   | Almondsbury CoE V.C. Primary School | Planned MetroBus Stops            |
| Proposed Vehicular Access                                     | Indicative Mixed-Use                     | Listed Buildings near site          | Existing Cycle Paths              |
| Pedestrian Access   | Indicative Streets                       | Almondsbury Community Shop          | Potential Extension to cycle path |
| Diverted PROW   | Indicative Informal Public Open Space    | Almondsbury Surgery                 |                                   |
| Existing PROW connected to diverted path                      | Indicative Play Spaces                   | Public House                        |                                   |





## Housing & wellbeing

Almondsbury is a strong and vibrant village with many facilities and community activities. Land at Almondsbury is an opportunity to create a development which promotes healthy lifestyles and support a community that meets people's needs. The development would:

- Benefit from easy pedestrian and cycle access to GP services at the nearby Almondsbury Surgery.
- Create new public open space for new residents and the existing community of Almondsbury.
- Have access to 13 primary schools within a 2 mile walking or cycling distance, including nearby Almondsbury CE VC Primary School, and 5 secondary schools within a 3 mile distance, including Patchway Community College 1.5 miles away (Appendix II and II to the South Gloucestershire Rural Settlements and Villages 2015 Topic Paper).
- Contribute to the strength of Almondsbury, with its village hall, community shop and public houses, as a thriving community.
- Potentially provide one or two new retail units on the Gloucester Road frontage (if there is community demand for this).
- Be permeable for pedestrians and cyclist with numerous links into existing residential areas to the north, allowing it to integrate with the existing village.

### **Quality and mix**

As local people and long-term owners of the land, the England family are determined to ensure that development of Land at Almondsbury provides both high-quality, distinctive design and a range of housing types and tenures. They would be keen to explore the potential to deliver a significant amount of self or custom-build development at the site.

### **Wellbeing**

Land at Almondsbury does not lie within an air quality management area and there are no noise constraints to its development (see below).

### **Noise**

Part of Land at Almondsbury lies close to the M4 motorway and consent has recently been granted for a new operations base for the Great Western Air Ambulance Service and National Policy Air Service helicopters to the south. In view of these noise sources, [REDACTED] (a Chartered Environmentalist, Member of the Institution of Environmental Sciences, Member of the Institute of Environmental Management and Assessment, and Member of the Institute of Acoustics) of Sharps Acoustics LLP has been asked to provide a technical report on noise. His report is attached as Appendix 2 to this document and confirms that there are no technical noise constraints preventing Land at Almondsbury from being developed for residential purposes.

Bristol Parkway Station



## Economic growth

Land at Almondsbury is extremely close to the major employment areas on the north fringe of Bristol, lying less than a mile from Aztec West. Development at Almondsbury could also contribute to increasing the diversity of employment space locally by providing flexible live-work or start-up units alongside new homes to create a vibrant mix of uses.

With excellent access to the motorway and mainline railway network, Bristol's north fringe is a key driver of the sub-regional economy. The north fringe is home to the University of the West of England, Southmead and Frenchay hospitals, the regional shopping centre at Cribbs Causeway and major employers providing over 70,000 jobs (South Gloucestershire Council figures).

With enterprise areas at Filton and Emersons Green and infrastructure improvements including new Metrobus routes, Metrowest rail upgrades and mainline electrification, the economic strength of the north fringe is set to continue to grow.

The north fringe functions as the second centre and node within the West of England (as illustrated by the workplace-based workforce at map Figure 3 to the Issues and Options consultation document).

The north fringe is a major driver of economic growth within the West of England. Locating new homes in close proximity to the north fringe provides the best opportunity to support sustainable growth.

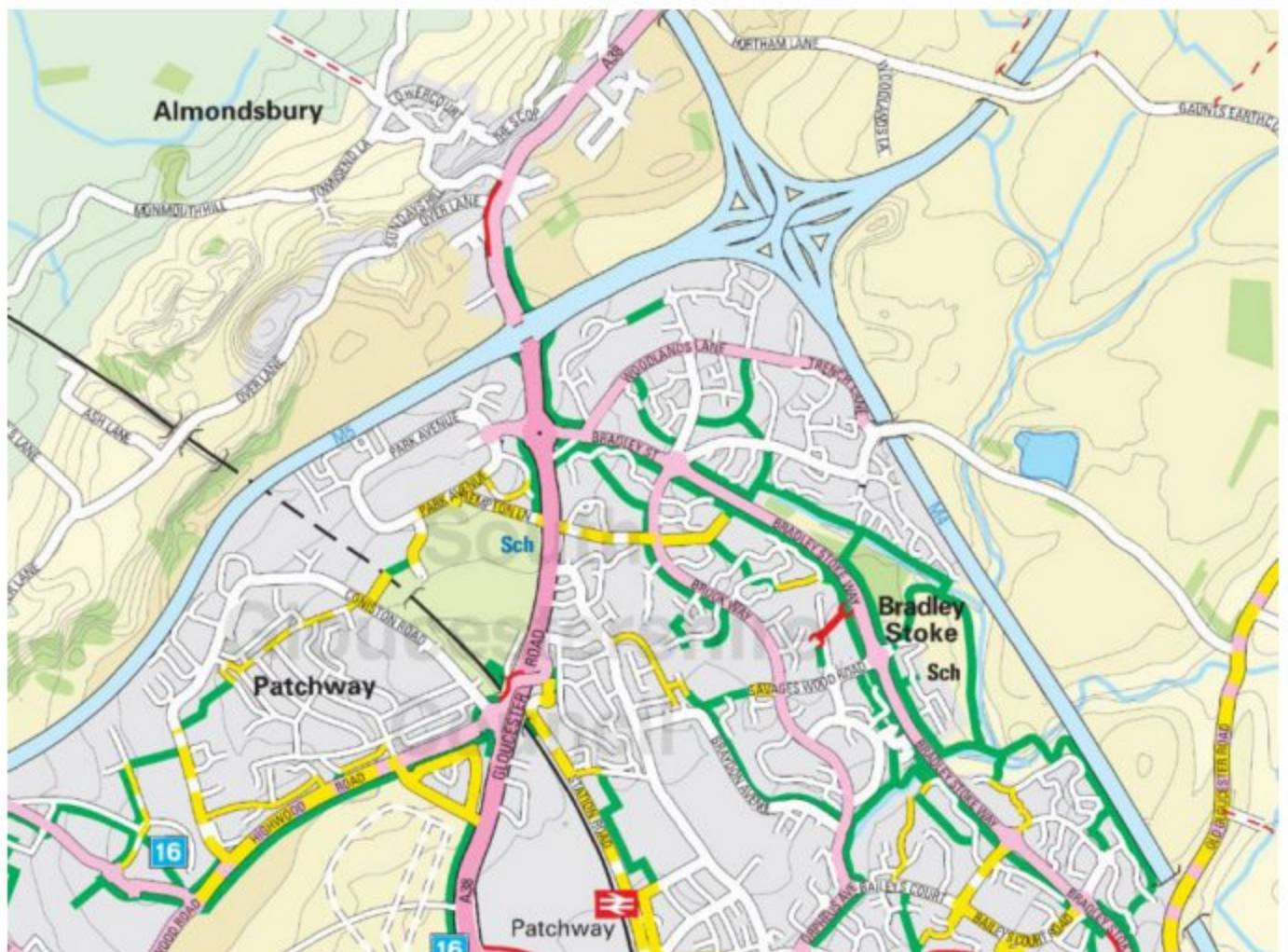


## Transport & infrastructure

Land at Almondsbury benefits from transport links by sustainable transport modes, with opportunities for future enhancements (see below):

- The site lies on a major bus corridor served by regular services to Bristol and Thornbury with short journey times. Bus journey times from the Gloucester Road stops to the immediate north of the site are 4 minutes to Aztec West, 14 minutes to Cribbs Causeway and 16 minutes to Bristol Parkway Station.
- The site benefits from the recently enhanced pedestrian and cycle routes along the Gloucester Road to the Aztec West roundabout and beyond to Patchway and Bristol Parkway railway stations (see extract from South Gloucestershire Council mapping below). There are opportunities to extend existing cycle routes north along the Gloucester Road to the site entrance.
- The new MertoBus north fringe to Hengrove route will provide a stop at Aztec West, just over a mile from the site, providing improved journey times to Bristol City Centre (7 minutes' cycle).
- The development would provide pedestrian permeability with adjacent areas and enhanced pedestrian links with Hortham Village.
- The site would be accessed from the A38 where the site has a frontage immediately to the south west of the bridge across the M4. A second access would be through Florence Park. A transport scoping report has shown that appropriate and safe vehicular access to the site can be provided for the scale of development proposed.

Extract from South Gloucestershire Council cycle routes mapping







### ***Coordinating residential development with transport improvements***

Among the future transport concepts being considered at the West of England Joint Transport Study Issues and Options stage are strategic corridor packages (bus, highways, active travel) for the A38. Development of Land at Almondsbury could be delivered in step with these improvements to the A38 strategic corridor, allowing future residents to benefit from improved accessibility and making effective use of infrastructure investment.

In the longer term, development of Land at Almondsbury would be well placed to link in with more ambitious transport improvements at the north fringe such as an extension of the MetroBus to Thornbury or a tram-train.



# Environment

Land at Almondsbury is not affected by significant environmental constraints:

- It lies within Flood Zone 1 (low probability) in which residential development is an appropriate use. SUDS would ensure that it does not contribute to flooding elsewhere.
- The site comprises agricultural fields of limited nature conservation value. Hedgerows on field boundaries and the narrow belt of planted woodland to the east represent the most valuable features of the site. It is not considered that ecology would be a significant constraint to future development.
- There are no designated heritage assets in close proximity to the site.
- The site does not comprise the best or most versatile agricultural land.

The site can be developed to make efficient use of land to create a compact, relatively high-density and attractive environment.



## Green Belt

Land at Almondsbury falls within Cell 3 (Almondsbury/ Easter Compton East) considered in the Joint Spatial Plan Green Belt Assessment. In that study the cell is identified as serving three Green Belt purposes: (1) preventing sprawl towards the Severnside area and the estuary, (2) safeguarding the countryside from encroachment, and (3) assisting in urban regeneration. However, within the larger cell, the site promoted would cause minimal harm to Green Belt purposes for the following reasons:

- It would be an extension to Almondsbury village, not the north fringe of Bristol, and therefore would not contribute to sprawl. The existing strong inner Green Belt boundary would be retained and the higher land to the south would remain open providing separation from the urban area to the south of the motorway.
- The site is visually contained by the M4 and higher ground and woodland to the south. Its development would therefore not represent a significant visual encroachment upon the countryside.
- The site would represent a relatively small, contained Green Belt release and extension to Almondsbury. The integrity and purpose of the wider Green Belt would not be harmed. In these respects an analogy can be made with the relatively recent development at nearby Hortham Village.

## Landscape

Land at Almondsbury benefits from significant visual containment provided by the belt of trees alongside the M4 and hedgerows to the south. The hill to the south of the site obstructs views into the village from the south. The M4 is in cutting along much of its frontage. Hedgerow strengthening with new tree planting to form a landscape corridor would form a strong southern boundary for development.

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# Spatial Scenarios & Conclusions

Within the West of England region the promotion of sustainable development is best served by a strategy that concentrates primarily on the Bristol urban area.

This provides numerous advantages:

- It makes efficient use of existing infrastructure.
- It allows infrastructure investments to benefit the greatest number of people, including existing and new residents.
- It meets needs where they arise, minimising the need to travel while maximising opportunities for active and non-car travel.
- It provides the greatest opportunity to create mixed-use and socially mixed areas.
- It provides for a diversity of lifestyles within a networked urban region.
- It minimises impact upon the open countryside, rural areas and the agricultural economy.

Development of Land at Almondsbury would provide these advantages while also supporting and enhancing an existing village community.

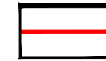
## **Conclusion - key advantages**

New residential development of Land of Almondsbury has the following key advantages:

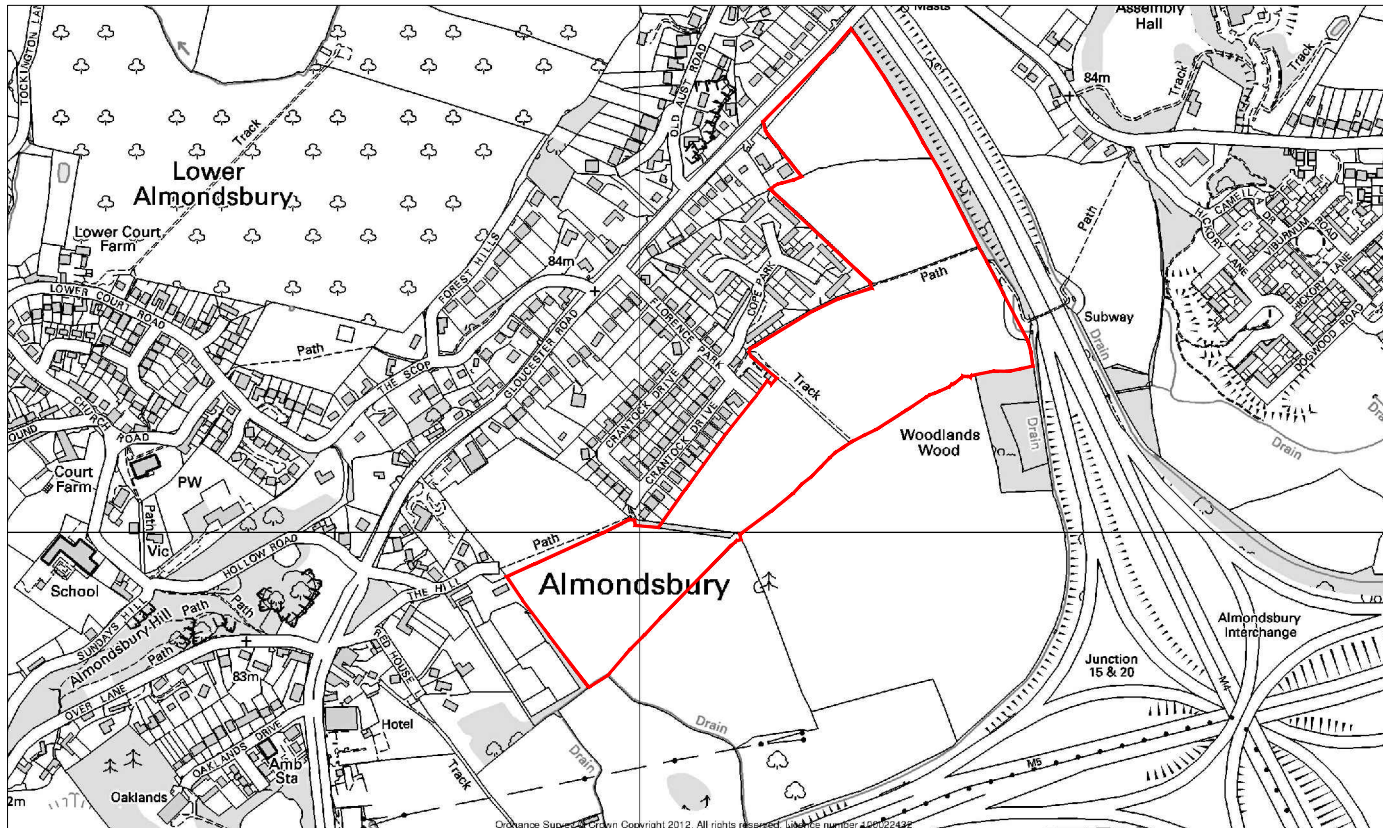
- It allows people to live locally in close proximity to employment in the Bristol north fringe, reducing travel and improving opportunities for those without cars.
- It benefits from a range of services in the village, which are within short walking and cycling distance, and can enhance those facilities by providing public open space and employment and/or retail uses.
- It has good existing public transport, walking and cycling links, with clear and achievable opportunities for future improvements along the A38 corridor.
- The landowners are local people who are committed to creating a successful community and willing to take a flexible approach. This would include providing a range of housing types and tenures, and could include a significant proportion of self/custom build.
- The site is visually contained and could be developed with minimal harm to the role and purposes of the Green Belt, relieving development pressure on more significant areas of Green Belt.
- There are no landscape, ecology, flooding, transport, heritage or other environmental constraints which suggest the site is unsuitable for residential development.



# Appendix 1 / Site location plan



Site Boundary (16ha)



Project  
**Land South of Gloucester Road  
Almondsbury**

Drawing Title  
**Site Location Plan**

Date	Scale	Drawn by	Check by
05.02.14	1:10,000@A4	SJ	NH
Project No	Drawing No		Revision
1300	9000		-



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# **Appendix 2 / Technical report on noise prepared by Sharps Acoustics LLP**

**From:** [REDACTED]

**Date:** 7<sup>th</sup> January 2016

**Subject:** Land south of Gloucester Road, Almondsbury

---

***Introduction***

- 1 Sharps Acoustics LLP (SAL) has been requested by Mr. England to provide advice on the likely noise constraints on the potential development of land at Almondsbury for residential purposes. A plan showing the area of land in question is attached.
- 2 The land is in relatively close proximity to the M4/M5 junction and is just to the north of land which has recently been granted planning permission for redevelopment to provide a new emergency operations base for the Great Western Air Ambulance Service and National Police Air Service helicopters.
- 3 The application for the Emergency Operations Base was accompanied by a comprehensive noise assessment undertaken by Arup (Ref 240151-08, R01-SH). The noise assessment contains information on measurements undertaken of the existing noise environment and modelling of both the existing and future (with helicopter operations) noise climate in the vicinity. Surveys. Several of the Noise Sensitive Receptor (NSRs) locations in that assessment are either on, or representative of, the land being considered by Mr. England.
- 4 We have, therefore, taken account of the Arup Report to enable an assessment to be undertaken of possible constraints on the development site, with particular emphasis on the residential elements of the development site coming forward.

***Assessment Criteria***

- 5 The National Planning Policy Framework (NPPF) sets out the Government's economic, environmental and social planning policies for England and "these policies articulate the Government's vision of sustainable development." In respect of noise, Paragraph 123 of the NPPF states the following:

*"Planning policies and decisions should aim to:*

- *avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;*

- *mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of condition;*
- *recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and*
- *identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”*

6 The NPPF reinforces the provisions within the March 2010 DEFRA publication, “Noise Policy Statement for England” (NPSE), which states three policy aims, as follows:

*“Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:*

- *avoid significant adverse impacts on health and quality of life;*
- *mitigate and minimise adverse impacts on health and quality of life; and*
- *where possible, contribute to the improvement of health and quality of life.”*

7 Together, the first two aims require that significant adverse impacts should be avoided and that, where a noise level which falls between a level which represents the lowest observable adverse effect and a level which represents a significant observed adverse effect, then according to the explanatory notes in the statement:

*“... all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life whilst also taking into consideration the guiding principles of sustainable development. This does not mean that such effects cannot occur.”*

### *Internal Noise Levels*

8 It is possible to apply objective standards to the assessment of noise and the design of new dwellings and how one should seek to achieve these objective standards. The nationally applied standard is BS 8233:2014 'Guidance on Sound Insulation and Noise Reduction for Buildings'. Table 4 of the standard contains the following design targets for residential dwellings, which have been adopted in the consideration of Masterplan constraints:

BS 8233:2014 Table 4 Indoor ambient noise levels for dwellings			
Activity	Location	0700 to 2300	2300 to 0700
Resting	Living room	35 dB $L_{Aeq,16hour}$	-
Dining	Dining room/area	40 dB $L_{Aeq,16hour}$	-
Sleeping (daytime resting)	Bedroom	35 dB $L_{Aeq,16hour}$	30 dB $L_{Aeq,8hour}$

- 9 NOTE 5 to Table 4 of BS8233:2014 states that *“If relying on closed windows to meet the guide values, there needs to be an appropriate alternative ventilation that does not compromise the façade insulation or the resulting noise level.”* Similar advice is given in the Online National Planning Practice Guidance-Noise (NPPG-N), which states that *“consideration should also be given to whether adverse internal effects can be completely removed by closing windows and, in the case of new residential development, if the proposed mitigation relies on windows being kept closed most of the time. In both cases a suitable alternative means of ventilation is likely to be necessary.”*

*External Areas (Gardens)*

- 10 For outdoor areas (i.e. gardens/terraces and balconies), BS 8233:2014 recommends that *“it is desirable that the external noise level does not exceed 50 dB  $L_{Aeq,T}$ , with an upper guideline value of 55 dB  $L_{Aeq,T}$ .”* However, the document recognises that these guideline values are not achievable in all circumstances and in higher noise areas, a compromise might be warranted. In such circumstances, development should be designed to achieve the lowest practicable levels in these external amenity spaces.
- 11 It should be noted that the guideline values in BS8233, derived originally from the World Health Organisation Guidelines for Community Noise, reflect the Lowest Observable Adverse Effect Level (LOAEL). That is, they are not limits, but levels below which the effects of noise are negligible. Significant effects (i.e. the Significant Adverse Effect Level, SOAEL) would not occur until much higher degrees of exposure. In other words, design for compliance with the LOAEL levels given in the documents would robustly meet the first aim of the NPPF in avoiding significant adverse impacts and the second aim in mitigating and minimising other adverse impacts.
- 12 This approach is consistent with that adopted by Arup in their consideration of noise affecting existing residents.

## **Summary of Arup Assessment**

- 13 The Arup report assesses the proposed (now consented) relocation of the Emergency Air Operations base to land adjacent to the M4/M5 interchange at Almondsbury, just south of the development site being considered by Mr. England. It is of note that the proposed flight paths would be in a westerly, easterly or southerly direction and not to the north over the site being considered here.
- 14 The assessment addresses noise from the EC135-HM65 helicopter operated by the Great Western Air Ambulance Service and the EC135-T2+ helicopter operated by the National Police Air Service. It is noted that basis of the Arup assessment is that the Air Ambulance does not operate at night and that the Police helicopter may operate on average on one occasion (i.e. one approach and one departure) per night. Total helicopter movements equate to 5 approaches and 5 departures per day and 1 approach and 1 departure per night.
- 15 The assessment considers some 14 Noise Sensitive Receptors (NSRs). Of those, the following are of interest for the site being considered, in that they are either on, or representative of, the site:
- NSR 3 Cope Park Residential
  - NSR 4 Crantock Drive Residential
  - NSR 6 Florance Park Residential
  - NSR12 Red House Lane Residential
  - NSR 13 The Hill Residential
- 16 By reference to the Arup report and noise contours, the noise climate at the NSR locations is currently dictated by noise from road traffic on the nearby motorway network. The daytime noise climate from the motorway network across the site reaches approximately 65 dB LAeq,16Hour along the southern and western edges of the site and reduces to less than 55 dB LAeq,16hour in the northern areas. These levels increase to up to 70 dB LAeq,16hour for a strip of land running parallel to the M4 to the east.
- 18 Similarly at night, the noise climate is dictated by noise from the motorway, reaching approximately 55 dB LAeq,8Hour along the southern and western edges of the site and reducing to around 50 dB LAeq,8hour in the northern areas. These levels increase to up to 65 dB LAeq,8hour for a strip of land running parallel to the M4 to the east.

- 19 Section 9.3.1 of the Arup report considers the calculated change to the noise climate which would result from the proposed helicopter operations. At the NSR locations considered to be representative of the site, the worst case changes during the day occur at NSR 13 (maximum 0.8 dB increase in LAeq,16 hour levels). At night, the worst case changes occur at NSR4 (maximum 1.3 dB increase in LAeq,8hour).
- 20 These changes are negligible and it can be concluded from the Arup assessment that there is very little difference between the existing and future noise contours, indicating that future helicopter operations will not dictate the noise climate across the site, but that motorway noise will continue to be dominant, as is the case now.
- 21 The noise climate is at levels where noise mitigation measures would be necessary to achieve acceptable future levels in gardens and inside dwellings but that would be achievable with sensible design and masterplanning and physical mitigation measures.

### ***Recommended Approach to Development***

- 22 The progression of the masterplan and noise mitigation concept can be informed by results of further surveys and noise modelling, but the following design principles and hierarchy of noise control can guided the early masterplan and indicative layouts:
- Assess the site to identify and quantify significant noise sources
  - Decide noise criteria and limits for spaces in and around the building(s)
  - Evaluate the acoustic and cost effectiveness of design and layout options to manage noise impacts to acceptable levels
  - Consider using sound insulation of building envelope in order to achieve acceptable acoustic conditions after attenuation by other options has been considered but does not perform adequately and/or is not cost effective or appropriate in design terms
- 23 The Arup modelling of the current and future noise environment shows the impact of noise from the motorway network and future helicopter operations on the site. This, along with further work can inform the development of a noise mitigation concept.

### ***Mitigation Concept***

- 24 Much of the mitigation concept will be dependent on the potential future masterplan which would include the proposed location of housing in relation to the noise sources. The critical area is the eastern boundary with the M4 and the southern boundary with the proposed Emergency Air Operations Base.



- 25 For both areas, it is recommended that the location and orientation of residential buildings be carefully considered in masterplanning. Zoning of residential areas to the north and west of the site, where possible, would be beneficial.
- 26 For the eastern boundary, the M4 can be screened by considering an acoustic barrier. This could take the form of an earth bund, an acoustic fence, or a combination of the two. It is not uncommon for such barriers to be in excess of 4 metres in height and this can provide very significant screening to the development beyond and allow for the majority of the development in that part of the site to be designed without the need for acoustic control measures in the fabric of the buildings themselves.
- 27 With the exception of hover-taxiing and ground operations, acoustic screening of the air base will not be of benefit as the noise sources are principally at high level above the ground (i.e. helicopters). The orientation and careful siting of residential buildings on the southern part of the site will, therefore, be important in minimising noise impacts from both the motorway network and the air base.
- 28 It is not always possible in new development, especially near to strategic transportation corridors, to achieve appropriate internal noise levels with windows open, but the reliance on closed windows to control noise can be minimised as far as possible through layout and design measures. In this instance, the layout can be carefully developed such that, for example, only the properties on the extreme edges of the site would require acoustic control in the facades. It is acknowledged by Arup (Para 9.3.2) that existing properties are likely to rely on closing windows to control noise from existing sources, and this would also be the case for some (but not all) of any new properties on the site. With windows closed in those properties there would be no observed effect from noise from the motorway network or the air base.
- 29 This is a common and recognised method of achieving appropriate internal noise levels (see note above on BS8233:2014 and the NPPG-N). It would be possible to minimise (but not completely remove) the number of habitable rooms in those facades, but where reliance on closed acoustic windows is necessary, such a scheme would be accompanied by appropriate alternative ventilation, acoustically treated where necessary (for example, a whole-house mechanical ventilation and heat recovery system, or a passive ducted system).

### **Summary**

- 30 The initial analysis, above, demonstrates that an acceptable environment can be achieved through the use of established constraints and design parameters. Modelling of final development layouts and design specifications for acoustic treatment can be undertaken as development proposals progress. However, the assessment of current and future noise levels demonstrates that an appropriate internal and external noise environment can be achieved for future residents.

## **Conclusion**

- 31 It can be concluded that the site is suitable for residential development in respect of the noise environment, subject to appropriate mitigation measures to achieve levels at or below the Lowest Observed Adverse Effect Levels set out in the World Health Organisation and BS8233:2014 guidance. In relation to planning policy, this would meet the first aim of the NPPF and NPSE, to avoid significant adverse impacts, and there would, therefore, be no technical noise reason to resist residential development of the site.



**APPENDIX 2**  
**JSP REPS**  
**DECEMBER 2016**  
**EMERGING SPATIAL STRATEGY**

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# Land South of Gloucester Road, Cope Park and Crantock Drive and west of the M4, Almondsbury

WoE JSP Emerging Spatial Strategy December 2016

For Mr A D England

December 2016

**Land South of Gloucester Road, Cope Park and  
Crantock Drive and west of the M4, Almondsbury**

**WoE JSP Emerging Spatial Strategy December 2016**

**For Mr A D England**

<b>Project Ref:</b>	23335/A3/SE/jmm	23335/A3/SE/jmm	
<b>Status:</b>	Draft	Final	
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<b>Date:</b>	8 <sup>th</sup> December 2016	14 <sup>th</sup> December 2016	
<b>Prepared by:</b>	Simon Ellinger	Simon Ellinger	
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Ref: 23335/A3/SE/jmm  
Date: December 2016

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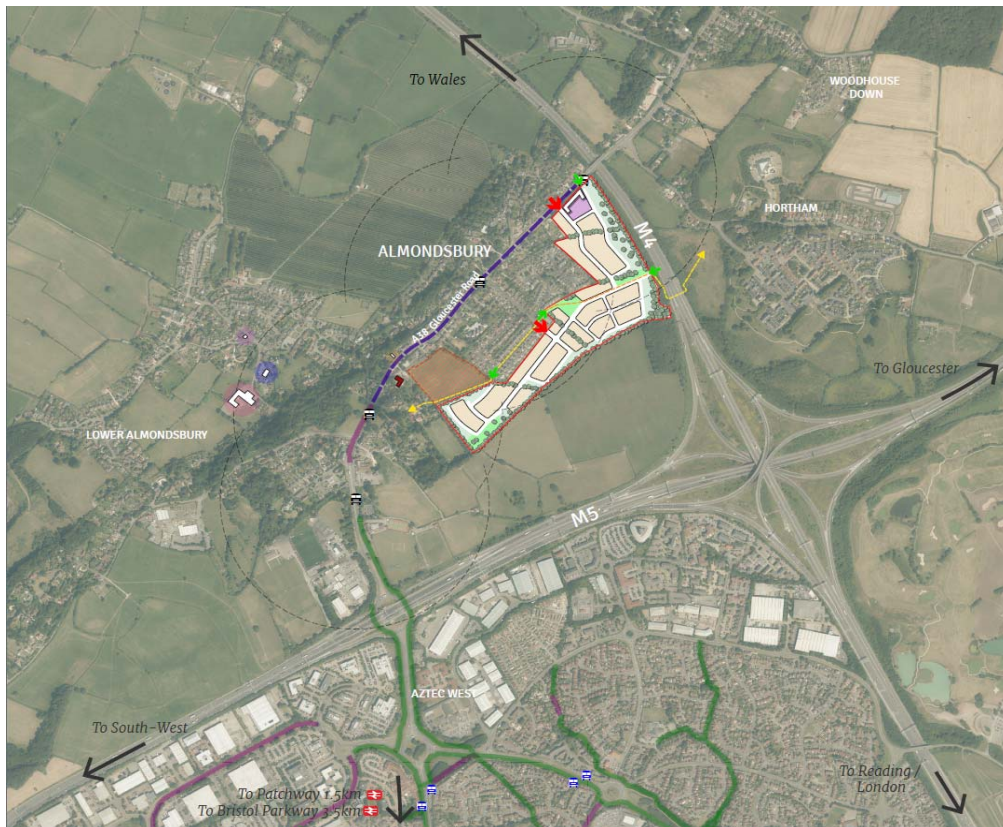
## 1.0 SUMMARY

- 1.1 These representations are submitted on behalf of Mr A D England who has 15.6ha of land at Almondsbury. This land is being promoted for development for circa 400 homes. Whilst we recognise it is not a strategic site for the purposes of the JSP, we believe that the site performs well when assessed against key sustainability criteria and therefore provision should be made for its allocation either through the JSP (as part of a larger allocation for Almondsbury) or by way of identification of the area to be removed from the Green Belt and to be allocated through the Core Strategy review. We set out the case for allocation in the remainder of these representations. These representations should be read alongside those submitted at the Issues and Options stage.

### Site Location



Concept scheme





## 2.0 INTRODUCTION

2.1 This representation accompanies a completed Location Submission Form and promotional document submitted on behalf of Mr A D England in respect of his land South of Gloucester Road, Cope Park and Crantock Drive and west of the M4, Almondsbury. It provides additional information relevant to consideration of the site's suitability for development and addresses points raised in the Emerging Spatial Strategy (ESS). The ESS assesses Almondsbury, to which the site is located, as below:

**“Some 13,500 dwellings also remain to be constructed on land allocated in the South Gloucestershire Local Plan & Core Strategy across the Bristol North & North East Fringe communities over the next 10-15 years. Further strategic growth in the locality is likely to undermine delivery of these key sites. Moreover major strategic growth is not considered appropriate due to the village being constrained by noise, pylons, solar park and proposed air ambulance site to its south / southeast and high landscape value / slopes towards the Severn Vale to its northwest. Similar to land north of M4/M5, strategic growth would also have a severe impact on Hortham village and J16, being in such close proximity. Bristol has also historically predominantly grown north & eastwards. Strategic growth would thus also significantly add to the impression of sprawl in the locality significantly undermining the objectives of the Greenbelt. Therefore, the settlement/locality is not considered suitable for strategic level growth but may have potential for some non-strategic growth to support local services”.**

### 3.0 THE SITE

- 3.1 The site comprises 5 separate fields lying between the existing southern and eastern settlement boundary of Almondsbury and the M4 motorway. The combined area of the fields is approximately 15.6ha. The field boundaries are defined by hedgerows with interspersed trees. The unique topography, along with a thick belt of planting, prevents views of the site from the M4 motorway which is to the east of the site and the M5 motorway, which lies beyond fields to the south
- 3.2 The land is relatively flat, rising slightly in the western part of the site. A public footpath runs along the northern boundary of the south-easternmost field. The north-westernmost field lies to the south of playing fields. To the north of the site is a mid twentieth century residential area which comprises houses on Florence Park, Crantock Drive and Cope Park. There are existing gated accesses to the site from Gloucester Road and Florence Park.
- 3.3 The site lies within the Green Belt, which surrounds and 'washes-over' Almondsbury. The site lies in flood zone 1 (low probability) and, save for its Green Belt designation, is not subject to any landscape or other designations.
- 3.4 Searches of South Gloucestershire Council's online planning records have revealed no relevant planning history for the site.

## 4.0 SUITABILITY – GREEN BELT

4.1 The principal constraint affecting the site is its location within the Green Belt. The Green Belt around Almondsbury generally was considered as part of the Strategic Green Belt Assessment 2011 and the South Gloucestershire Green Belt Assessment 2006 which both formed part of the evidence base for the Core Strategy. Both documents identified the Green Belt around Almondsbury in general as contributing to Green Belt objectives. However, neither document was fine-grained enough in its analysis to consider the specific contribution of the Gloucester Road site itself to Green Belt objectives.

4.2 The JSP Green Belt Assessment Stage 1 took a similarly broad approach looking at the entirety of the plan area, considering if an area contributes towards each of the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). Namely:

Purpose 1. To check the unrestricted sprawl of large built up areas.

Purpose 2. To prevent neighbouring towns from merging into one another.

Purpose 3. To assist in safeguarding the countryside from encroachment.

Purpose 4. To preserve the setting and special character of historic towns;

Purpose 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.3 A subsequent Green Belt Assessment Stage 2 has been undertaken in order to inform the Emerging Spatial Strategy, to which this representation responds. Due to the extensive nature of the Green Belt within the plan area (circa 63,742 hectares), the Stage 2 Assessment focuses on those locations identified at the Joint Spatial Plan Issues and Options stage as potential strategic development locations.

4.4 These locations have been divided into 'sub cells'. These sub cells have subsequently been individually assessed in order to determine the degree to which each location contributes to the five purposes of the Green Belt. This is in contrast to stage 1, which sought only to determine if a contribution was made. As such, stage 2 can be considered the 'next stage' of the Green Belt Assessment process.

4.5 Land South of Gloucester Road, Almondsbury has been assessed within the Green Belt Assessment Stage 2 as part of sub cell 03d. This includes the site in question, along with land to the south that borders the M5 Motorway. An extract showing sub cell 03d is reproduced below for reference.



Extract showing Sub Cell 03d

4.6 Sub Cell 03d has been assessed as making the following contributions to each of the five purposes of the Green Belt.

Purpose	Contribution
1. to check the unrestricted sprawl of large built up areas.	Major
2. to prevent neighbouring towns from merging into one another.	None
3. to assist in safeguarding the countryside from encroachment.	Limited
4. to preserve the setting and special character of historic towns;	None
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	All sites are considered to contribute to Purpose 5 as assessed at stage 1.
<b>Overall Contribution to GB purposes</b>	Major

4.7 Sub Cell 03d has been assessed overall as making a major contribution to Green Belt purposes. This is predicated on the contribution to Purpose 1. This highlights the flawed method of reviewing larger areas as a whole.

4.8 Whilst it is accepted that assessing individual sites may not be practical, it does ensure that one site or area is not ‘tarred with the same brush’ simply by its physical proximity to a neighbouring parcel. Unfortunately Land South of Gloucester Road, Almondsbury has been a victim of this approach.

4.9 We consider that the JSP evidence base is not adequately detailed to provide a proper and robust assessment of the contribution that this site serves to the purposes of the Green Belt and take this opportunity to highlight the justification as to why this site provides **Limited Contribution** to Green Belt purposes and not a Major Contribution as has been determined. We agree with the assessment’s conclusion in so far as part of cell 03d can be considered to provide a major contribution to Green Belt purposes, namely the land to the south of the site that borders the M5 Motorway. This is particularly in relation to Purpose 1 - to check the unrestricted sprawl of large built up areas.

4.10 We set out our supporting information below.



Diagram showing the relationship of Land South of Gloucester Road within the locality.

4.11 The diagram above seeks to highlight the flaws in assessing wider areas as a whole, rather than individual sites on their own merits. Land South of Gloucester Road ‘The Site’ sits on higher ground ‘The Plateau’ which lies north of the ‘Severn Ridge’. Extensive natural screening, together with undulating topography, result in The Site having a natural relationship to the housing area around Florence Park and the A38 to the north.



4.12 Land to the south of the Severn Ridge slopes gradually from north to south and forms a significant relationship with the M5 Motorway that acts as its southern boundary. Land to the north, beyond the 'Scarp Edge' slopes steeply from south to north and benefits from views out towards the Severn Estuary. This is further reinforced by way of the South Gloucestershire Landscape Character Assessment as below:

**“The M4/M5 interchange similarly has a significant local effect upon the adjacent landscape and built edge of Almondsbury Business Park, but remains screened from Almondsbury village and the wider Severn Ridges area by the ridge landform at Almondsbury.”**

4.13 Having reviewed the analysis of the 12 sub cells which are considered to make Limited Contribution, and which might thus be removed from the Green Belt, the relevant factor appears to be that they are defined by definable boundaries, formed by a combination of roads, railways, existing development or landscape features. We consider that this is also true of Land South of Gloucester Road.

4.14 The photographs below provide a greater depth of context to the diagram above, demonstrating that The Site is visually enclosed in its own right with a natural relationship to the north and not to the south, as a result of topography and extensive natural screening.



Above: Diagram showing the direction of photographs as below

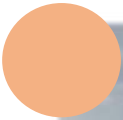


Above: View looking north from the M5 Motorway. The site is not visible, being beyond the Severn Ridge line in the distance and behind extensive natural landscaping that itself is not visible. The Site provides no contribution to Green Belt purpose 1 from this vantage point.



Above: View looking north-west from the M4/M5 Motorway flyover and thus the highest potential viewpoint over the site. The natural landscaping along the Southern Ridge starts to become visible in the distance, as does the roofs of houses in the westernmost part of development at Crantock Drive. The Site lies beyond this natural landscaping and so is not visible even from this raised vista. At best, it can be considered that the site provides limited contribution. Land to the south of the Southern Ridge is prominent in the foreground and provides major contribution to Green Belt purposes, acting as a green buffer.





Above: View looking west from the M4 Motorway. Extensive natural landscaping obscures any possible view of the site. As a result, the site provides no contribution to Green Belt purpose 1 from this vantage point.



Above: View looking north east from the A38 Gloucester Road. Extensive natural landscaping in the distance obscures any possible view of the site. Furthermore, this aspect is broken up by dispersed low impact development in the foreground comprising sports amenity facilities and wind turbines. As a result, the site provides no contribution to Green Belt purpose 1 from this vantage point.

4.15 Removal of The Site from the Green Belt would not undermine Green Belt objectives nor would it undermine the effectiveness of the M5/M4 as a boundary to the Green Belt.

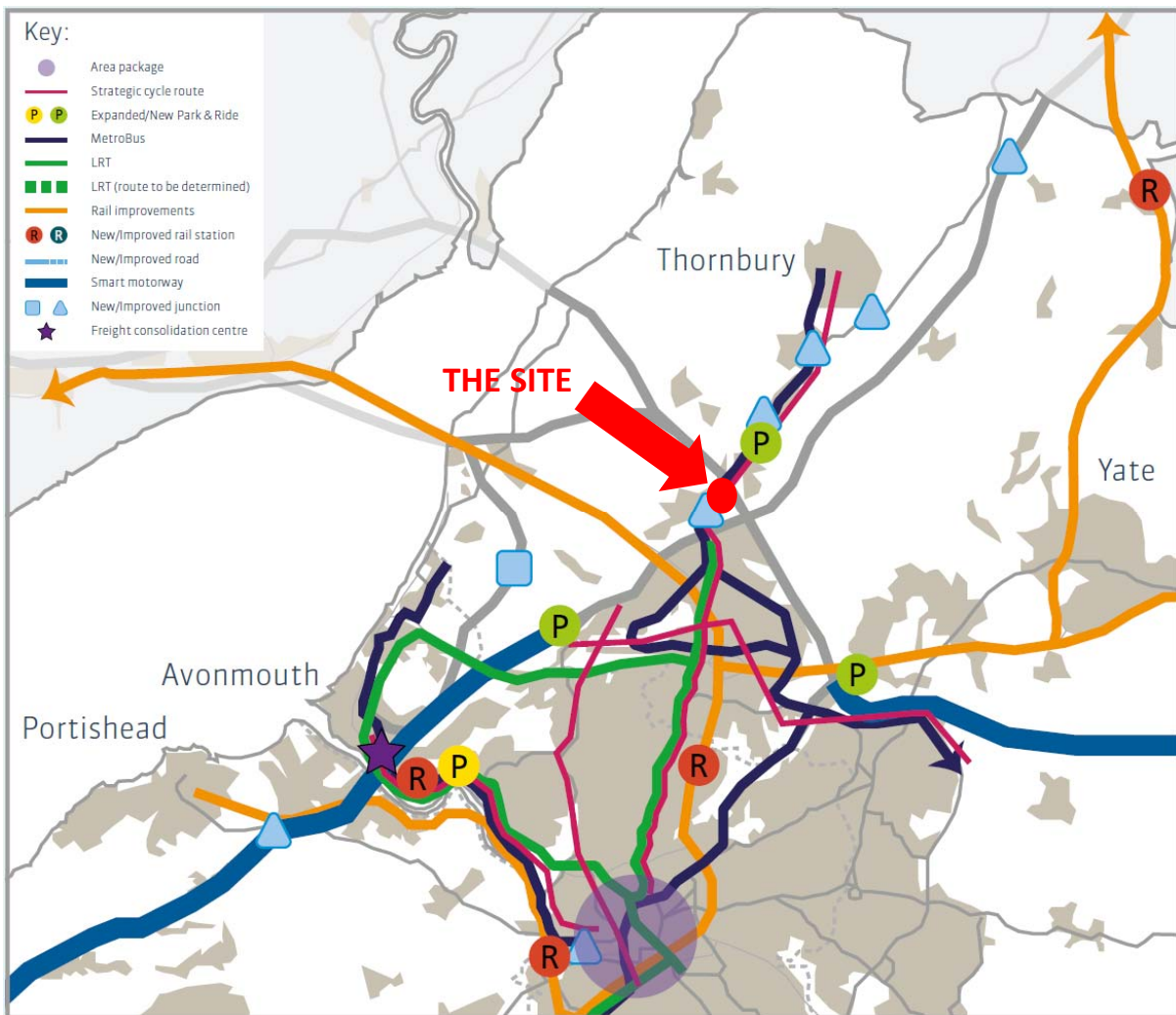


## 5.0 SUITABILITY - SUSTAINABILITY

- 5.1 Almondsbury Parish had a 2011 population of 4,705. The village has a primary school, a public house, community hall, GPs' surgery, and a community shop.
- 5.2 Bus stops on Gloucester Road and within the immediate vicinity of the site, are served by regular buses between Bristol and Thornbury with weekday frequencies of 30 minutes in each direction. Bus journey times to Cribbs Causeway bus station are 10 minutes, to Thornbury approximately 15 minutes and Bristol Bus Station approximately 43 minutes. This service also provides a direct route from the village to Patchway Community College, the nearest secondary school approximately 1.3 miles away.
- 5.3 The site lies approximately 1.2 miles from the Aztec West employment area and 3.3 miles from Patchway Railway Station. The promotional document submitted alongside this representation demonstrates the existing pedestrian and cycle routes that provide unrestricted access to the North Fringe and beyond.
- 5.4 The Emerging Spatial Strategy Sustainability Appraisal assesses Almondsbury to have "very poor local transport connections incapable of serving a strategic quantum of development". However, previous studies undertaken by South Gloucestershire Council, which form part of the evidence base for both the Core Strategy and more recent Policies, Sites and Places DPD, appear to fundamentally contradict this conclusion.
- 5.5 The South Gloucestershire Council 'Community Profiles' document (undated) which formed part of the Core Strategy evidence base, identified Almondsbury as having "Good public transport provision" with "Easy access to the north fringe of Bristol".
- 5.6 Furthermore, the Rural Settlement and Villages 2015 Topic Paper- Sustainable Access to Key Services and Facilities & Demographic Information document (November 2015) scored Almondsbury 27 out of 40 and having "Good Access" to Services and Facilities.

**"Settlements have a balanced range of services and facilities within walking and cycling distance, for some settlements this will include health care facilities. Some settlements have access to multiple retail, food shops or major employers. Settlement likely to have access to broadband and good public transport links to a major centre. Some settlements lack good walking and cycling access to one particular type of facility or service, often local shops (non-food) or permanent library".**

- 5.7 When assessing Land South of Gloucester Road (the site) as part of area AH2, against Sustainability Objective 2d –Achieving reasonable access to educational facilities (primary schools, secondary schools), the Sustainability Appraisal scores -/-- for both the medium and long term. This is in contrast to area AH3 to the west, that scores ++ for both time periods. Whilst we accept that each area must be judged on its own merits, we can find no justified reason to determine why area AH2 has any less access to education facilities than area AH3. Moreover, and as detailed above, there are bus stops directly adjoining area AH2 with regular and direct routes to Patchway Community College, as well as a consolidated footway along the entirety of the route. The Sustainability Assessment wrongly skews the comparative assessment to the detriment of Land South of Gloucester Road and Almondsbury as a whole.
- 5.8 One must also consider the site within the context of proposals coming forward as part of the emerging Joint Transport Plan (JTP). An extract from the JTP is reproduced below and this clearly highlights the strategic location of the site in relation to the transport vision for this locality and the West of England region. Whilst indicative at this stage, it would appear that the main Aztec roundabout on Gloucester Road will act as a key transport hub for MetroBus, proposed Light Rapid Transit (LRT) and Strategic cycle routes.
- 5.9 Improvements to M5 J16 will no doubt address concerns raised in relation to Almondsbury as a suitable location for strategic growth as detailed at Section 2.1 of this document. These improvements will be complimented by an extension of MetroBus to Thornbury, along a transport corridor that directly adjoins the northern boundary of the site, and to where existing bus stops could be integrated. As set out above, whilst the M5 Motorway does pose a visual barrier, there is existing unrestricted pedestrian and cycle access to the North Fringe and beyond. The proposed extension of the Strategic cycle route throughout the village and up to Thornbury will further enhance Almondsbury as a location for sustainable development.



Extract from Joint Transport Study – North Fringe and Severnside to Bristol

- 5.10 In summary, the site benefits from access to local facilities and services, good public transport accessibility, and close proximity to the major employment areas of the north fringe of Bristol and Cribbs Causeway. The proximity of the site to principal employment centres means that it is a logical location for providing new homes without encouraging long distance commuting by car. Future proposals coming forward as part of the Joint Transport Plan (JTP) as outlined above, will only seek to further enhance the suitability of the site and cement this location as a highly sustainable location for future development.
- 5.11 Development of the site could support the realisation of some of the proposed community aspirations mentioned in the Draft Policies, Sites & Place Plan (June 2014) such as increased capacity at Almondsbury School, provision of a village shop/post office and provision of new playing fields/green spaces.

## **Response To The Emerging Spatial Strategy**

5.12 We set out below our response to the JSP Emerging Spatial Strategy in relation to Land South of Gloucester Road, Almondsbury.

### ***Housing Requirement for the West of England***

5.13 We continue to wholeheartedly support the preparation of a Joint Spatial Plan for the West of England region. However, we have serious and legitimate concerns that the proposed Emerging Spatial Strategy is simply not planning for enough housing over the plan period. Having reviewed submissions to the Issues and Options consultation, it is clear that these concerns are echoed by a large number of stakeholders.

5.14 This plan making process is placed against a back-drop of continuous under-supply of housing across the three Unitary Authorities of South Gloucestershire, BANES and North Somerset over the last fifteen years. Failing to take the tough decisions now, as part of a regional strategic plan, will only seek to further exacerbate an already acute problem.

5.15 Evidence submitted by Barton Willmore on behalf of a consortium of developers demonstrates that the JSP SHMA is too low and is not based on a robust Objective Assessment of Need. The implications of not correctly establishing the OAN for the West of England are severe and underestimating the OAN would have significant implications for those people living in the region and its businesses including:

- Worsening housing affordability, with young people increasingly unable to get on the housing ladder;
- Increased costs for private renting;
- Increased housing need and an ever-increasing backlog of housing delivery;
- Increased commuting by residents to work and increased congestion; and
- Significant impacts on the growth of the West of England economy, in terms of recruitment and retention of skilled workers.

5.16 Following a review of the evidence base as a result of representations made during the Issues and Options Consultation, the JSP will now plan to meet the needs arising from

both the Bristol and the Bath housing market areas to 2036. Allowing for a 2% buffer for updated estimates, the JSP will now seek to provide the framework to deliver up to 105,000 net additional new homes between 2016-2036.

- 5.17 Whilst we further support the approach to include the Bath HMA, the revised OAN still falls far short of that evidenced in Barton Willmore’s OAN report, which demonstrates that the true housing need is a minimum of circa 140,000 homes.
- 5.18 The housing targets for the region can only be met through the delivery of all strategic sites being considered as part of this ESS consultation, as well the identification of further large-scale strategic and medium-scale non-strategic sites. An over reliance on large-scale strategic sites has the potential to significantly undermine the spatial objectives of the JSP and lead to development coming forward in an unplanned sporadic manner over the short to medium term. The JSP provides a key opportunity to identify additional sustainable sites, such as Land South of Gloucester Road, Almondsbury, which can contribute to the housing target for the West of England.
- 5.19 The JSP must take account of evidence submitted by others in relation to the OAN and plan positively to enable economic and housing growth in the region. In order to plan positively for growth the JSP must also consider all reasonable alternative locations for housing delivery and consider higher housing figures to provide a contingency for any site delivery issues across the region.

**JSP Spatial Objectives**

- 5.20 The site presents a significant opportunity to contribute to the JSP Spatial Objectives, and we set out more detail on this in the table below:

Housing and wellbeing	The site has the potential to deliver in the range of 390-460 dwellings (based on a density of between 25 and 30 dwellings per hectare).  In light of the above, the site presents a significant opportunity to contribute to the JSP housing requirement, at a sustainable location in close proximity to the North Fringe urban area, which is well-served by existing infrastructure.
Economic growth	The site presents an opportunity to deliver housing close to the jobs, services and infrastructure of the North Fringe. Housing in this location will facilitate and enable economic growth and provide housing for the communities in this locality.
Transport and infrastructure	As detailed above, the site benefits from access to local facilities and services, good public transport accessibility, and close proximity to the major employment areas of the north fringe of



	<p>Bristol and Cribbs Causeway. The proximity of the site to a principal employment centres means it is a logical location for providing new homes without encouraging long distance commuting by car.</p>
<p>Environment</p>	<p>The site is in a sustainable location well served by infrastructure, services and transport, and close to the existing facilities at the North Fringe.</p> <p>Any scheme would seek to incorporate climate change mitigation in accordance with planning policy.</p>

## 6.0 CONCLUSIONS

- 6.1 We continue to wholeheartedly support the preparation of a Joint Spatial Plan for the West of England region. However, we have serious and legitimate concerns that the proposed Emerging Spatial Strategy is simply not planning for enough housing over the plan period.
- 6.2 This site represents an opportunity for an extension to the village of Almondsbury which could be achieved without compromising Green Belt objectives. The site could provide new homes in a sustainable location, which would support the vitality of Almondsbury and its local services, while allowing easy access to the facilities and employment opportunities in the north fringe of Bristol.
- 6.3 An over reliance on large-scale strategic sites has the potential to significantly undermine the spatial objectives of the JSP and lead to development coming forward in an unplanned sporadic manner over the short to medium term. Sites of this nature, that can be brought forward quickly, will be key to meeting the suppressed housing need for the West of England region.
- 6.4 For the reasons set out above, this site should be removed from the Green Belt as part of this plan making process and identified as a location for a development of circa 500 homes; or specifically recognise that this area of land should be removed from the Green Belt and allocated for non-strategic growth through the Core Strategy Review. This should be in a similar vein to that of land at Ashton Vale, which has been indicated within the Emerging Spatial Strategy as a specific non-strategic growth area that will be removed from the Green Belt.

**Appendix 1**  
**JSP Representation**  
**Land South of Gloucester Road, Almondsbury**

## **Addressing the consultation questions**

### **Consultation Question 1**

#### **Does the proposed strategy make adequate provision to address the housing needs of the West of England?**

No. The proposed strategy is not based on a robust Objective Assessment of Need. The implications of not correctly establishing the OAN for the West of England are severe and underestimating the OAN would have significant implications for those people living in the region and its businesses. As addressed at Sections 5.13 – 5.19.

### **Consultation Question 2**

#### **How can we increase the delivery of homes, in particular much needed affordable homes in the West of England?**

The housing targets for the region can only be met through the delivery of all strategic sites being considered as part of this ESS consultation, as well as the identification of further large-scale strategic and medium-scale non-strategic sites. An over reliance on large-scale strategic sites has the potential to significantly undermine the spatial objectives of the JSP and lead to development coming forward in an unplanned sporadic manner over the short to medium term. The JSP provides a key opportunity to identify additional sustainable sites, such as Land South of Gloucester Road, Almondsbury, which can contribute to the housing target for the West of England. As addressed at Section 5.13 – 5.19.

### **Consultation Question 3**

#### **Does the proposed strategy make adequate provision to address the economic and employment needs of the West of England?**

No. As has already been established, the West of England Region is one of the fastest growing and most productive in the country. The proposed strategy significantly underestimates the Objectively Assessed Need for housing and this will bring significant impacts on the growth of the West of England economy, in terms of recruitment and retention of skilled workers.

### **Consultation Question 4**

#### **Does the Preferred Spatial Strategy and the locations identified meet the plan's strategic priorities and vision?**

We consider that additional sites need to be identified in order to meet the true housing need in the West of England. We have assessed the performance of Land South of Gloucester Road, Almondsbury against the Plan Spatial objectives in Section 5.20 and demonstrated that the site performs well against and can contribute towards these objectives.

### **Consultation Question 5**

#### **Are there any reasons why this strategy or identified locations could not be delivered?**

Additional sites need to be identified to meet the true OAN. Land South of Gloucester Road, Almondsbury could help to meet the housing need and is a suitable site to do so. Further evidence of why this site is appropriate to contribute towards the housing requirement is set out in the remainder of this representation.

Consultation **Question 6****Is the Preferred Spatial Strategy the most appropriate strategy, when considered against the reasonable alternatives?**

Additional sites need to be identified to meet the true OAN. Land South of Gloucester Road, Almondsbury could help to meet the housing need and is a suitable site to do so. Further evidence of why this site is appropriate to contribute towards the housing requirement is set out in the remainder of this representation.



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**APPENDIX 3**  
**RURAL SETTLEMENT SCORES**

**Information extracted from**  
**Topic Paper: 'Sustainable Access to Key services and**  
**facilities and demographic Information' (November 2015)**

Settlement	Shopping	Health	Community	Education	Employment	Broadband	Public Transport	Total Score
Yate	9	3	6	6	6	4	6	40
Thornbury	9	3	6	6	6	4	6	40
Winterbourne	9	1	6	6	2	4	6	34
Frampton Cotterell	9	3	5	6	2	0	6	31
Alveston	6	1	5	6	6	0	6	30
Wick	5	2	5	6	0	4	6	28
Coalpit Heath	6	3	5	6	2	0	6	28
<b>Pucklechurch</b>	<b>2</b>	<b>2</b>	<b>5</b>	<b>6</b>	<b>2</b>	<b>4</b>	<b>6</b>	<b>27</b>
Pilning	2	3	5	3	4	4	6	27
Hambrook	1	0	4	6	6	4	6	27
Charfield	4	0	5	6	2	4	6	27
Almondsbury	1	2	4	6	4	4	6	27
Engine Common	1	0	3	6	6	4	6	26
Shortwood	6	0	1	6	5	0	6	24
Severn Beach	3	0	4	3	4	4	6	24
Marshfield	2	2	5	3	2	4	6	24
Falfield	1	0	5	6	2	4	6	24
Wickwar	2	0	5	6	0	4	6	23
Tockington	3	0	4	6	0	4	6	23
Iron Acton	2	0	5	6	4	0	6	23
Cromhall	2	0	5	3	2	4	6	22
Bridgegate	1	0	1	6	4	4	6	22
Redwick	2	3	3	3	4	0	6	21
Oldbury on Severn	4	0	5	6	2	4	0	21
Hawkesbury Upton	3	0	5	3	0	4	6	21
Easter Compton	0	0	5	6	4	0	6	21
Bitton	2	0	3	6	0	4	6	21
Rangeworthy	0	0	4	6	0	4	6	20
Westerleigh	1	0	3	6	2	0	6	18
Siston	0	0	0	6	2	4	6	18
Old Sodbury	2	0	3	6	0	0	6	17
Tytherington	1	0	3	6	0	0	6	16
Olveston	3	0	5	6	0	0	2	16
Hallen	0	0	4	6	0	0	6	16
Upton Cheyney	2	0	1	6	0	0	6	15
Horton	0	0	3	6	0	0	6	15
Badminton	1	1	4	3	0	4	2	15
Rudgeway	0	0	2	6	0	0	6	14
Tormarton	0	0	4	3	0	4	2	13
Latteridge	0	0	0	6	0	0	6	12
Hortham Village	1	0	1	6	4	0	0	12
Aust	2	0	4	3	3	0	0	12
Old Down	2	0	1	6	0	0	2	11
West Littleton	0	0	1	3	0	0	6	10
Littleton upon Severn	0	0	4	6	0	0	0	10
Cold Ashton	1	0	3	0	0	0	6	10
Rockhampton	0	0	3	6	0	0	0	9
Elberton	0	0	2	6	0	0	0	8
Acton Turville	1	0	2	3	0	0	2	8
Hinton	0	0	4	3	0	0	0	7
Doynton	0	0	4	3	0	0	0	7
Hill	0	0	0	3	0	0	0	3
Dyrham	0	0	1	0	0	0	0	1

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