

16th December 2016

Delivered by email

West of England Joint Planning Consultation,
c/o South Gloucestershire Council,
PO Box 299,
Corporate Research and Consultation Team,
Civic Centre,
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Bristol,
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Dear Sir/Madam

WEST OF ENGLAND JOINT SPATIAL PLAN TOWARDS THE EMERGING SPATIAL STRATEGY DOCUMENT – RESPONSE ON BEHALF OF BLOOR HOMES SOUTH WEST.

A POTENTIAL GARDEN VILLAGE OPPORTUNITY TO THE NORTH WEST OF BANWELL

On behalf of our client **Bloor Homes South West** [“Bloor Homes”] we are instructed to submit the following representations to the aforementioned document. Bloor Homes is currently in advanced discussions with landowners to the north west of Banwell (please see the approximate location plan at Appendix 1) with a view to bringing forward a new garden village settlement.

We are aware that, following the suggestion of a potential for a new settlement to come forward along the M5/A38 corridor, there will be many respondents who may question the deliverability of such an option. This representation, therefore, seeks to alert the JSP authorities to Bloor Homes’ interest and advanced discussions to bring forward such an option.

Support, in Principle for the JSP

Bloor Homes is one of the largest providers of new homes in England and the West of England, and has interests in a number of sites across the West of England area.

Planning for sustainable development, including necessary infrastructure, on a coordinated basis across the West of England area is supported as a matter of importance to ensure that sufficient development can be achieved to meet the needs of the area and to ensure that economic potential is optimised.

The provision of an effective and sound Joint Spatial Plan (JSP) to guide development is therefore supported, and a robust plan should be put in place as expediently as possible. This process is important to all of the West of England Local Authorities to ensure that up-to-date Development Plans are provided and maintained.

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The Opportunity to Deliver a New Garden Village to the North West of Banwell

Within Section 6 of the National Planning Policy Framework (“NPPF”) which sets out the national policy position on delivering a wide choice of high quality homes, paragraph 52 states:

“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.”

The M5/A38 Corridor is identified in the emerging Spatial Strategy Document as a potential strategic development location to deliver up to 5,400 dwellings, possibly by a new garden village. In respect of the M5 to A38 Corridor, the ‘Assessment of Strategic Development Locations Beyond Settlement Boundaries: Location Dashboards’ from the supporting JSP evidence base states:

- *Constraints mapping suggests that there is potential for additional strategic growth within the general area north of the A368 dependant on a new M5 A38 link road, avoiding the AONB and impacts upon its setting and ecologically sensitive areas.*
- *A total potential for up to about 5,400 dwellings has been identified along the M5 to A38 corridor incl. potential around Churchill/ Langford. This would require a new distributor road with connections into the new development. Wider opportunities along the M5 to A38 corridor may be considered.*

The land identified on the accompanying approximate location plan is:

- Located directly to the north of the proposed Banwell Bypass and could therefore contribute directly to its delivery;
- Located outside of, and away from, the Mendip Hills AONB to the south;
- Located outside of a large area identified as Flood Zone 3 to the north and west, a key constraint in North Somerset ; and
- Located outside of any other restrictive designations.

Bloor Homes support the principle of the A38/M5 corridor as a potential strategic development location and consider that development in this area can make a significant and important contribution to the regions housing needs within (and beyond) the JSP plan period in a sustainable manner as advocated by the NPPF.

Response to Consultation Questions

1. Does the proposed strategy make adequate provision to address the housing needs of the West of England?

Bloor Homes is part of a consortium who has commissioned Barton Willmore to prepare a joint response on housing needs including a detailed assessment of the **West of England Housing Target Paper**

(September 2016). The Barton Willmore response is being submitted separately and is fully endorsed by our client.

It is essential to identify and plan for the full objectively assessed need for housing and other associated development across the whole West of England (WoE) area. In this regard the proper (robust) identification of the Housing Market Areas and the need for development within them is a fundamental building block for the plan.

This aspect is covered comprehensively in a separate consortium response provided on behalf of Bloor Homes and others. In summary, the consortium's review of the **WoEs Housing Target Paper** (Sept 2016) concludes that the level of housing proposed is not sufficient to meet the full objectively assessed need for the West of England and indicates that the level of housing planned should be increased to **140,310** dwellings over the plan period.

The WoEs current housing target comprises the delivery of 105,000 dwellings between 2016 and 2036 across all four authorities. This target applies a 2% buffer above the housing need identified within the WoEs Housing Target Paper. However, we raise concern - as set out in the separate representation - which triggers a fundamental revisiting of the housing evidence so as to provide a more robust basis upon which to establish the objectively assessed housing needs for the WoE area.

Q2 How can we increase the delivery of homes, in particular much needed affordable homes?

The separate consortium response concludes that the level of housing proposed is not sufficient to meet the full objectively assessed need for the WoE and indicates that the level of housing to be planned for should be increased to **140,310** dwellings over the plan period. Allocating sites for the increased level of planned housing will in turn assist in a proportionate increase in the delivery of affordable housing.

The introduction of a positive planning policy context for the delivery of housing at a new settlement (or 'garden village') scale in the region (such as the identification and support for such development in the M5/A38 corridor) is encouraged. The identification of locations for delivery of housing at this scale can help to ensure that the much needed market and affordable homes required are delivered. Through multiple phases and sales outlets, new settlements are capable of delivering housing at high and consistent delivery rates. In addition, the identification of an option of this nature is also capable of delivering housing across many years, likely beyond the current plan period. By doing so, this sets a positive context for housing delivery in the region in the longer term.

Q4 Does the Preferred Spatial Strategy and the locations identified meet the plan's strategic priorities and vision?

In principle, we support the preferred Spatial Strategy which promotes development in a range of locations. The pursuit of a range of options (known as typologies) which prioritises urban living alongside new settlements, urban extensions, green belt release and non-green belt development has the potential to deliver the much needed housing (including affordable housing) that the WoE area needs.

Bloor Homes consider that development at the scale of a new settlement, aside from significant contributions to housing need, would also be capable of meeting the other strategic priorities and visions of the JSP such as providing the opportunity and gravity to secure the necessary financial contributions required to deliver the regions strategic infrastructure aspirations as set out in the Joint Transport Strategy.

Q5 Are there any reasons why this strategy or identified locations could not be delivered?

Notwithstanding our support for the preferred Spatial Strategy, there are a number of factors which require careful consideration to ensure the delivery of homes provides fully for the objectively assessed development needs of the area; and to ensure the objectives of the JSP are met.

Key factors which could hinder delivery include; the ability to maximise development potential in urban areas, the need for an early positive policy context for new settlements to give confidence in the long term and significant investment required; the need for a robust assessment of Green Belt land and suitability of land for release; and the timely delivery of infrastructure as set out within the Joint Transport Strategy (JTS).

New Settlements

We support the principle of new settlements, including locations such as the M5/A38 corridor, as one of a mix of typologies put forward within the preferred Spatial Strategy to facilitate development and meet housing need.

A Spatial Strategy that identifies a new settlement (and partially relies upon its delivery) should recognise the lead-in times associated with the achievement of the full quantum of development that might be expected as part of any such proposal and the delivery of the necessary infrastructure.

Significant delivery from a new settlement option can be achieved in the current plan period but the overall benefits from such options are expected to be seen not only in the current plan period, but also beyond. This creates a long term positive policy context for the delivery of much needed housing and associated infrastructure in the region.

As identified in the Spatial Strategy Document, strategic development within the M5/A38 corridor is considered likely to require the following transport improvements and provisions:

- Mitigations, possibly including a Park & Ride (A38/M5 junction 21);
- Junction improvements including M5 junction 21; and
- A Banwell Bypass would need to be delivered in advance to support this location.

Taking those into account, we consider that a thorough and supportive planning policy framework is required to aid delivery of a potential new settlement.

Joint Transport Strategy

We support the ambitions of the Joint Transport Strategy (JTS) which seeks to address the WoEs historic shortfall in investment in public transport and sustainable travel options. Delivery of the JTS is projected to require a total of £7.5bn of investment in multi-modal packages (£1.1bn deriving from developer contributions).

An increase in the JSPs target delivery of homes (to reflect the robustly assessed housing need put forward by the consortium) and directing that additional growth to areas where transport funding is needed most will assist in the delivery of the ambitions set out within the JTS by securing proportionately more funding from developer contributions and adding more weight when lobbying for government funding.

We consider that the identification and delivery of a potential new settlement within the M5/A38 corridor could make an important contribution to the above investment requirements, and the delivery of the JTS to help fulfil the regions requirement for strategic infrastructure improvements. Indeed, without significant new growth along the M5/A38 corridor and the positive planning policy context that such growth will require, important infrastructure investment including the bypass to the north of Banwell (which has long been identified as an ambition, as set out in Policy CS10 of the adopted North Somerset Core Strategy) are very unlikely to be realised.

Q6 Is the Preferred Spatial Strategy the most appropriate strategy, when considered against the reasonable alternatives?

We support the preferred Spatial Strategy in principle albeit the delivery targets must be set against a robustly assessed housing need for the WoE area (as covered comprehensively in the separate consortium response). The Spatial Strategy must be sustainably driven and we consider the strategy which promotes development in a range of locations the most appropriate.

We look forward to participating in the next stage of the plan. Once discussions with landowners have been concluded, we would be pleased to meet with Officers to begin early dialogue on this exciting garden village opportunity to the north west of Banwell.

Yours faithfully



Jeff Richards

Office Director

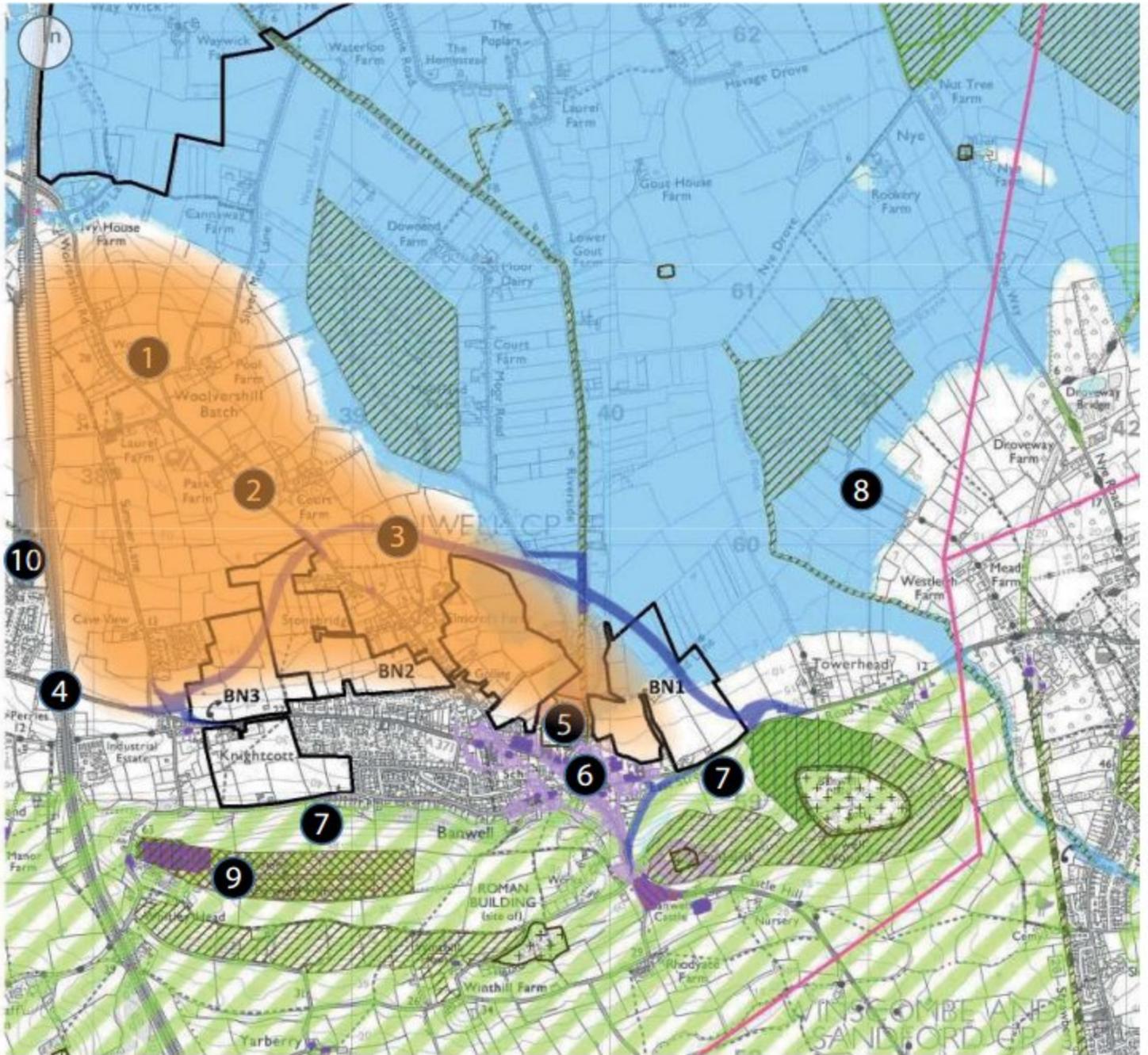


Appendix 1: Approximate Location Plan

- Ramsar Sites
- Special Protection Areas
- Special Areas of Conservation
- Common Land
- Sites of Nature Conservation Importance
- National Nature Reserves
- Local Nature Reserves
- Ancient Woodland
- Scheduled Ancient Monuments
- Regionally important Geological Sites
- Registered Historic Parks and Gardens
- Registered Battlefields
- National Trust Inalienable Land
- Local Historic Parks and Gardens

- Listed Buildings
- Conservation Areas
- Sites of Special Scientific Interest
- Flood Zone 3b
- Flood Zone 3
- Flood Zone 2
- Areas of Outstanding Natural Beauty
- Green Belt
- Overhead Powerline
- Gas Pipeline
- Development Commitments (2015)
- Assessment Areas

- 1** High point north of A371 is Woolvers Hill
- 2** Wolverhill Rd
- 3** Safeguarded Banwell bypass alignment
- 4** Potential location of new J21a motorway junction
- 5** Scheduled Ancient Monument
- 6** Various heritage features to east of village
- 7** AONB influences potential immediately adjacent
- 8** Extensive tidal flood zone on lower ground
- 9** Ecologically sensitive site
- 10** Committed Parklands development (Weston Villages)



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Approximate area for the potential garden village

Client:
Bloor Homes
Project:
A38/M5 Corridor
Drawing:
Area for the potential garden village

Project Number:	Status:
BLOA3027	Final
Drawing Number:	Scale:
11_	NTS @ A4
Revisior:	Date:
01	December 2016

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