

# South Gloucestershire Council New Local Plan Site Submission Form (2023 Phase 3)



## GUIDANCE ON COMPLETING THIS FORM

Please return this form if you are suggesting a site to be considered in the South Gloucestershire Local Plan 2020. 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: [policy.consultation@southglos.gov.uk](mailto:policy.consultation@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.**

The information collected as part this consultation will also be used by the council in accordance with the data protection principles in the Data Protection Act 1998. The purpose for collecting this data is: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may 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 response form, in accordance with the Freedom of Information Act 2000.

The purpose for holding your personal information is to assist in preparing development plan documents and supporting supplementary planning guidance and advice; and to contact you, if necessary, regarding the planning consultation process relating to their preparation. In order to provide the above service we may share your information with the following:

- Other South Gloucestershire Council departments
- External consultants working on behalf of South Gloucestershire Council
- Other Local Planning Authorities (LPAs)
- Other groups preparing statutory development plans relevant to South Gloucestershire

Please follow the link to our [Privacy Policy](#) and [Data Protection Policy](#) to find out more.

## 1. CALL FOR SITES SUBMISSION CHECK LIST

In order for South Gloucestershire Council to accept Call for Site submissions please ensure the boxes below are ticked to confirm the documents which are being sent for each separate site.

Please note that your submission including any supporting information will be published. We will undertake a redaction process to ensure that sensitive information is removed, however if you are aware of any sensitive information in your supporting documents, please do make us aware.

### REQUIRED DOCUMENTS

- Completed Call for Sites Application form **(included)**
- Site Map with a clear line boundary to outline the site promoted for development **(included)**
- Proof of Land ownership/Proof of support from Landowner **(please refer to site location plan for P23/01230/F (red and blue line))**

### ADDITIONAL DOCUMENTS

Please indicate below any additional supporting documents you are submitting alongside the required documents. You can also indicate where useful information can be found in these documents when filling out the other sections of the form below.

- Transport Study
- Ecological Study
- Landscape Assessment
- Greenbelt Assessment
- Viability Statement
- Housing Market Report
- Heritage Statement
- Vision Document
- Air Quality Report
- Noise Report
- Design Panel Review
- Delivery Statement
- Utilities Report
- Contamination Report
- Water Report
- Flood Report
- Archaeology Report
- Pre-App Response
- Other (Please state) **Copy of Phase 3 – towards a preferred strategy Consultation representations on behalf of Canada Life Asset Management.**

### CALL FOR SITES OUTSIDE OF CONSULTATION PERIODS

Promoters wishing to submit call for sites outside of a formal consultation period or to submit additional technical information to support their existing call for sites should contact our Planning Policy Team using the details below. We will confirm if we are able to accept the submission. If so, there will be a charge of £290 plus VAT.

Completed forms and supporting documents should be emailed to: [policy.consultation@southglos.gov.uk](mailto:policy.consultation@southglos.gov.uk).

**2. HAS THE SITE PREVIOUSLY BEEN SUBMITTED TO THE COUNCIL? No**

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).

Date of submission

		<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	

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

N/A

**3. YOUR DETAILS**

Name

[Redacted]

Company/Organisation  
(if applicable)

[Redacted]

Address

[Redacted]

Telephone

[Redacted]

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:

[Redacted]

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 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)?

N/A

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

- Yes
- No

\*We will now require proof of landownership or confirmation from the landowner that they support development of their land as outlined under section 1

#### 4. SITE DETAILS

Site Address (including postcode where applicable)

Filton Retail Park, Fox Den Road, Stoke Gifford, BS34 8SP

Site Area (Hectares)(if known)

2.5

Current land use(s)

Retail park

Adjacent land use(s)

Retail and offices.

Relevant planning history (if known)

P23/01230/F (Redevelopment of former garden centre and part of existing retail park car park to provide a purpose-built student accommodation building (sui generis) ranging in height from 5 to 9 storeys, ground floor shared communal/welfare facilities, and associated ancillary development including the provision of green roofs, photo voltaic panels, and the inclusion of cycle parking, vehicular parking (for service, disabled and electric vehicles), together with public realm and hard and soft landscaping improvements, access and infrastructure works.)

Please tick box to confirm you have provided a site plan

#### 5. 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		200-300+ (subject to dialogue with officers. This figure is based on South Gloucestershire Council Density & Character Study January 2022 to give an indication of possible unit numbers. It identifies on page 97 a minimum and higher density range of 80-120 dph. The retail park (excluding area NF011) is circa 2.5ha, equating to 200-300 units. It is noted that the 120dph is not a maximum. It is possible that the site could potentially deliver a far greater number of residential units.)
Residential – Self-Build and Custom-Build		
Gypsy and Travellers / Travelling Showpeople sites		
USE		Specify (Wind, Solar, Other)

Renewable Energy		
<b>USE</b>		<b>Floorspace (m<sup>2</sup>) / number of floors/pitches / notes</b>
Office, research & development, light industrial (B1)		
General industrial (B2) / warehousing (B8)		
Sports / leisure (please specify)		
Retail		<b>Ground floor Class E (inc. retail) uses. Quantum tbc.</b>
Other (please specify)		

Additional notes about potential uses:

## 6. 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	<b>No</b>
Is the site subject to flooding?	Yes/No	<b>No</b>
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	Yes/No	<b>No</b>
Is there a possibility that the site is contaminated?	Yes/No	<b>No</b>
Can satisfactory vehicular access to the site be achieved?	Yes/No	<b>Yes</b>
Has the Highways Agency been consulted?	Yes /No	<b>No</b>
Is the site subject to any other key constraints?	Yes/No	<b>No</b>

### UTILITIES / INFRASTRUCTURE PROVISION

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

Mains water supply	<input checked="" type="checkbox"/>	Mains sewerage	<input checked="" type="checkbox"/>
Electrical supply	<input checked="" type="checkbox"/>	Gas supply	<input checked="" type="checkbox"/>
Landline telephone	<input checked="" type="checkbox"/>	Broadband internet	<input checked="" type="checkbox"/>
Other (please specify below)	<input type="checkbox"/>		

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

## 7. 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	<b>Existing retailer tenancies.</b>
Must land off-site be acquired to develop the site?	Yes/No	
Are there any current uses which need to be relocated?	Yes/No	<b>Potential relocation of existing retailers.</b>
Is the site owned by a developer or is the owner willing to sell?	Yes/No	

**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
		✓

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

Likely phased redevelopment. Mid-rise development likely, not necessarily on footprint of existing retail park terrace. Various matters to be discussed with Council.

## 8. 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	<b>Not know at this stage.</b>
Has a viability assessment / financial appraisal of the scheme been undertaken?	Yes/No	
Have any design work studies been undertaken?	Yes/No	



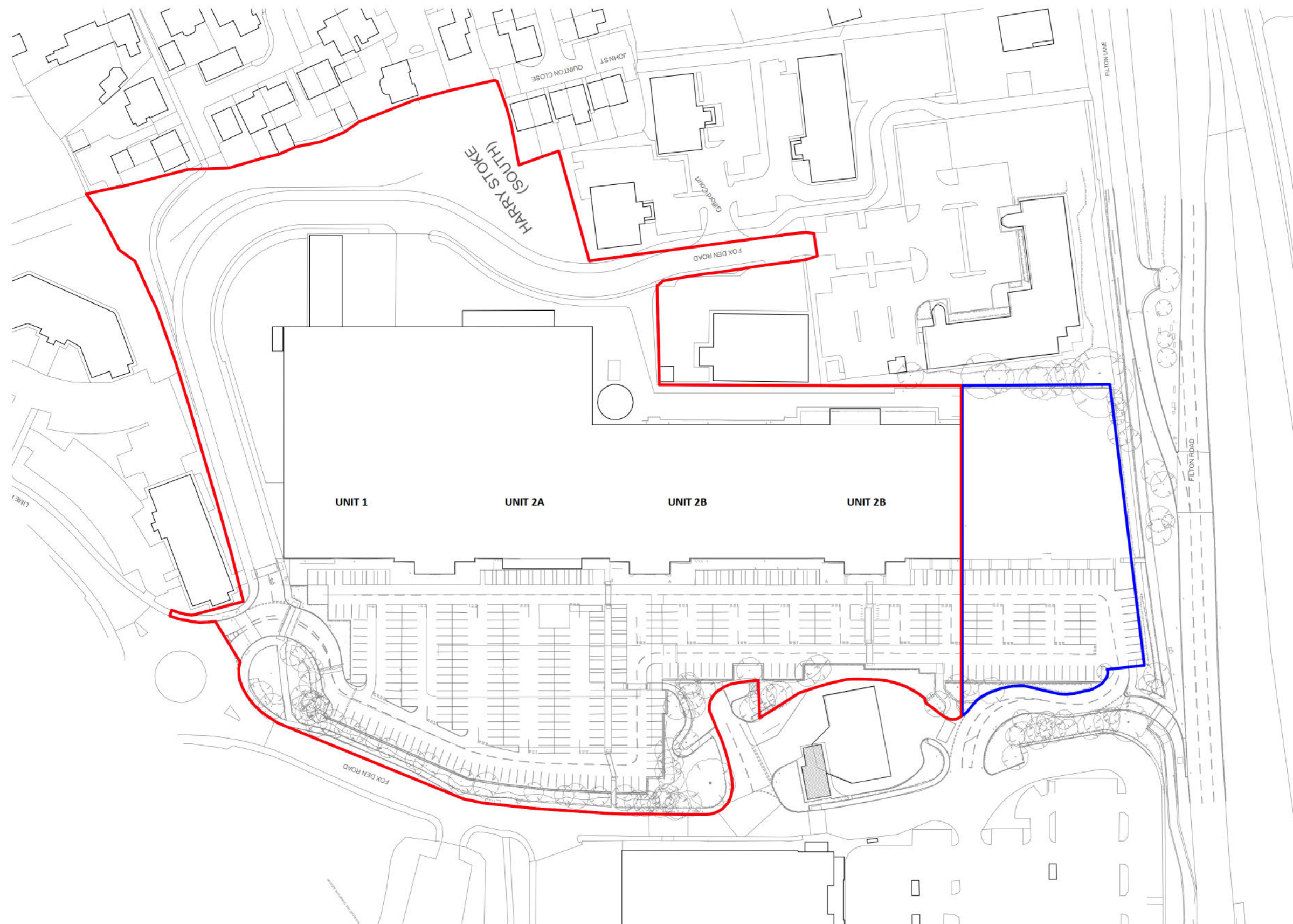
## 9. ADDITIONAL COMMENTS

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

**Please refer to additional information provided in our Phase 3 – towards a preferred strategy Consultation representations.**

**The development would represent and require comprehensive masterplanning which we would be happy to discuss in open dialogue with officers.**

**A call was held between me [REDACTED] to seek to discuss these proposals in a meeting to take forward.**



— Filton Retail Park

S2	P01	16/02/2024	Red Line Plan	
STATUS	REV	DATE	DESCRIPTION	
CLIENT				REVISED BY
Canada Life				MW
				CHECKED BY
				KL
				ORIGINATOR NO
				UNT2B

CONSULTANT  
**STRIDE TREGLOWN**  
[www.stridetreglown.com](http://www.stridetreglown.com) © Stride Treglown Limited 2020  
 PROJECT  
**Filton Retail Park**  
 Fox Den Rd, Stoke Gifford, Bristol BS34 8SP

DRAWING TITLE  
**Filton Retail Park - Red Line Plan**

SUITABILITY STATUS	SCALE
<b>S2 : Suitable for information</b>	As indicated@A3
DRAWING USAGE: <b>INFORMATION</b>	
PROJECT - ORIGINATOR - VOLUME - LEVEL - TYPE - ROLE - CLASS - NUMBER	STATUS_REVISION
UNT2B-STL-00-01-DR-A-ZZ-15001	S2_P01



**Our ref: 4028**

# **South Gloucestershire Council Local Plan**

**Phase 3 – towards a preferred strategy  
Consultation (December 2023)**

**Representations on behalf of**



**Relating to Filton Retail Park**

**Fox Den Road, Stoke Gifford**

**February 2024**



**Small Planning Consultancy of the Year London 2022**

**NTR Planning Ltd**

Henleaze Business Centre

Harbury Road, Henleaze

Bristol BS9 4PN

T 0117 244 9393

## Contents

- 1. Introduction and Background ..... 3
- 2. Site Description ..... 6
- 3. Current Relevant Development Plan Policies ..... 7
- 4. [REDACTED] Future Aspirations for Filton Retail Park ..... 9
- 5. Response to Phase 3 Consultation Document ..... 15
- 6. Conclusion ..... 19

## Appendices

Appendix 1 – Copy of completed Call for Sites form

Appendix 2 – Site Location Plan

## 1. Introduction and Background

1.1 These representations are submitted on behalf of [REDACTED] [REDACTED] the owners of Filton Retail Park. They are provided as part of, and in response to, South Gloucestershire Council's latest emerging Local Plan consultation document referred to as 'Phase 3 Towards a Preferred Strategy'. The consultation is being undertaken alongside a new 'call for sites' exercise. A completed call for sites form is provided at Appendix 1 and has been emailed to the Council under separate cover.

1.2 It is understood that the following milestones have so far been reached as part of the preparation of the new plan:

- The Phase 1 (issues and Approaches) consultation that ran from November 2020 to March 2021; and
- The Phase 2 (Urban, Rural and Key Issues) consultation that ran from February to April 2022.

1.3 In October 2020, NTR Planning submitted representations [REDACTED] as part of the Council's previous call for sites exercise. This sought formal recognition that part of the retail park – the area that comprised the former garden centre for B&Q (who previously occupied the entire building that is now subdivided to form the retail terrace) and part of the car park facing Filton Road – could be developed for:

1. a circa 96-120 bed hotel; or
2. a circa 150-175 unit student accommodation.

1.4 These submissions resulted in a draft allocation for the above described area as illustrated on the image extract overleaf (site ref. 'NF011'). The draft allocation did not quite mirror that sought, instead the Council earmarked the area for either student or residential accommodation. Neither [REDACTED] were party to any forewarning that this would be the case. It is noted under the current

consultation that site NF011 now has a draft allocation for residential development (132 homes).

**Image 1 – Draft allocation NF011**



1.5 Since making our previous representations in October 2020, NTR Planning sought and obtained detailed planning permission for Canada Life for the redevelopment of the area that makes up site NF011 to provide a 330-bed purpose-built student accommodation ('PBSA') building<sup>1</sup> for the benefit of students of the University of the West of England. [REDACTED] was case officer. The pre-commencement conditions for the planning permission are now discharged with the development soon to be commenced.

---

<sup>1</sup> Ref. P23/01230/F

---

1.6 The permission has a clear bearing on the draft allocation NF011, as it can no longer deliver hotel or residential accommodation. The permission would not appear to have been recognised in the formulation of the draft allocation. This appears at odds with the interactive plan for the proposed changes to the boundary of Stoke Gifford District Centre. The map seeks to remove the ‘*approved student housing site to the south*’ and include the approved supermarket to the north, which is currently under construction for Aldi.

1.7 [REDACTED] now seeks to discuss its future aspirations for the remainder of the retail park. **Subject to early collaborative dialogue with planning officers**, it is put forward that there may be the opportunity to seek recognition of the suitability of the provision of residential development as part of a potential future mixed-use redevelopment to assist the Council in its delivery of new homes over the 15-year plan period in a highly sustainable town centre location. The initial thought process behind these aspirations is set out in these submissions and justified against the NPPF, Practice Guidance and the direction of the draft plan. We make specific reference to the draft policy titled ‘Town Centres’ and set out some minor suggested changes to part of the policy text to support this form of mixed-use development. These suggested changes are supported by the NPPF and Practice Guidance, as documented in section 4.

1.8 The remainder of these representations are formatted as follows:

- Section 2** Provides a brief description of the site;
- Section 3** Provides a brief overview of current relevant planning policies affecting the site;
- Section 4** Provides details of the future aspirations and how these are already supported by the adopted development plan, NPPF and Practice Guidance;
- Section 5** Provides a response to those relevant areas of the Phase 3 consultation document pursuant to Canada Life’s future aspirations for the retail park; and
- Section 6** Provides an overall conclusion.



## 2. Site Description

2.1 Filton Retail Park is located on Fox Den Road in the Stoke Gifford area of the Bristol North Fringe. It is comprised of a single retail terrace formed out of the old B&Q. It is currently occupied as follows:

- Unit 1 – The Range (with small outdoor garden centre);
- Unit 2A – Lidl;
- Unit 2B – vacant unit; and
- Unit 3 – Everlast gym.

2.2 The site of the former enclosed outdoor garden centre (approximately 0.25 hectares), as well as the part of the car park where the PBSA is to be built, is shown in the photograph below. This is the area that is subject to draft allocation NF011.

**Image 2 – Former B&Q garden centre**



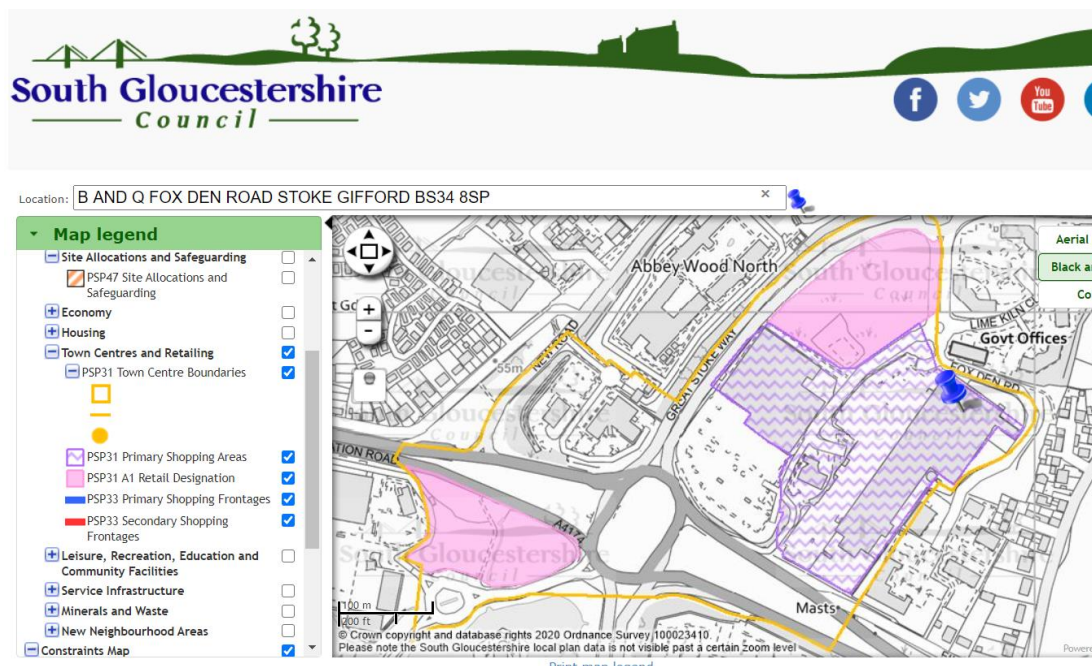
### 3. Current Relevant Development Plan Policies

3.1 As the Council will be aware, the development plan for South Gloucestershire presently comprises:

- The Core Strategy (adopted 2014); and
- The Policies, Sites and Places Plan (adopted 2017).

3.2 Below is an extract from the adopted Policies Map, displaying the town centre and retailing policies of the development plan. The top end of the retail terrace is marked with the blue pin. As can be seen, the retail park, along with the adjacent Sainsbury's supermarket, form the Primary Shopping Area of Stoke Gifford Town Centre – the area edged with the yellow line.

**Image 3 – Adopted Policies Map Extract**



3.3 The relevant allocations affecting the retail park comprise:

- CS14 – Town Centres and Retail
- PSP31 – Town Centre Boundaries
- PSP31 – Primary Shopping Areas

3.4 These policies generally seek to support the vitality and viability of the allocated centres within South Gloucestershire shopping hierarchy, including Stoke Gifford Town Centre.

3.5 ‘Town Centre Summaries’ are provided in Appendix 3 of The Policies, Sites and Places Plan. They set out the *‘The Key objectives for establishing a successful vibrant centre at Stoke Gifford’*. One of the objectives is to create:

*‘active frontages facing onto Filton Road, Station Road and Great Stoke Way  
-To encourage connectivity, legibility and vitality, breaking down the dominance of blank facades and surface car parking.’*

3.6 An active frontage will be provided to Filton Road as this was part of the design emphasis for the approved PBSA scheme.

3.7 Two other objectives are identified. One is to promote a:

*‘vertical and horizontal mix of uses to take advantage of the extremely sustainable location and the opportunities for higher density/intensity of development, making an effective use of land potentially including some residential use on upper floors;*

Another is to provide an:

*‘emphasis on high quality design and providing an urban development form with landmark buildings to enhance the local character, sense of place and legibility’*

3.8 These objectives are also recognised by Canada Life and tie in with its future aspirations, as set out in the following section.

**4. [REDACTED] Future Aspirations for Filton Retail Park**

4.1 This section sets out initial details of [REDACTED] current thoughts for the retail park going forward and demonstrates how they are already supported by the adopted development plan, the NPPF and Practice Guidance on *Town centres and retail*. This is important because, as identified at paragraph 35 of the NPPF, plans will be considered ‘sound’ if they are consistent with national policy. The Council will be aware that it was recently held<sup>2</sup> by the High Court that the Practice Guidance has the same legal status as the NPPF and therefore relevant text is referenced shortly.

4.2 As highlighted, the land subject to draft allocation NF011 is to be redeveloped as PBSA under planning permission ref. P23/01230/F. The permission is described as:

*‘Redevelopment of former garden centre and part of existing retail park car park to provide a purpose-built student accommodation building (sui generis) ranging in height from 5 to 9 storeys, ground floor shared communal/welfare facilities, and associated ancillary development including the provision of green roofs, photo voltaic panels, and the inclusion of cycle parking, vehicular parking (for service, disabled and electric vehicles), together with public realm and hard and soft landscaping improvements, access and infrastructure works.’*

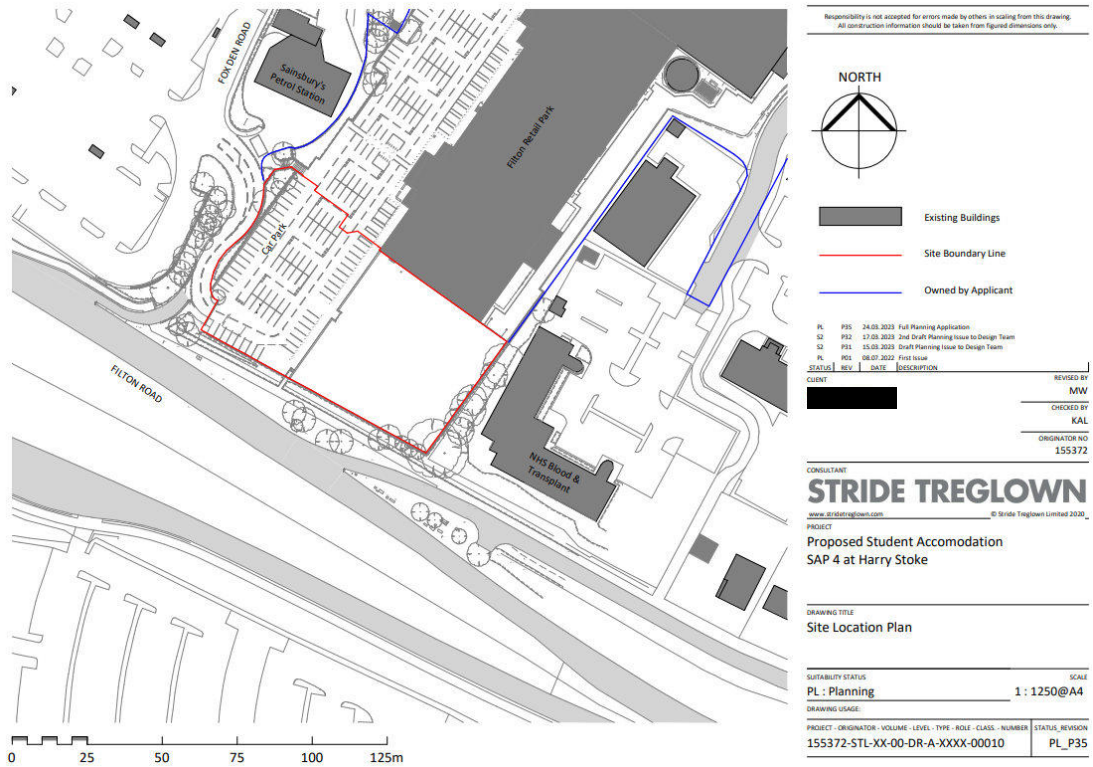
4.3 An extract of the approved site location plan and one of the visuals for the permitted scheme are provided overleaf.

---

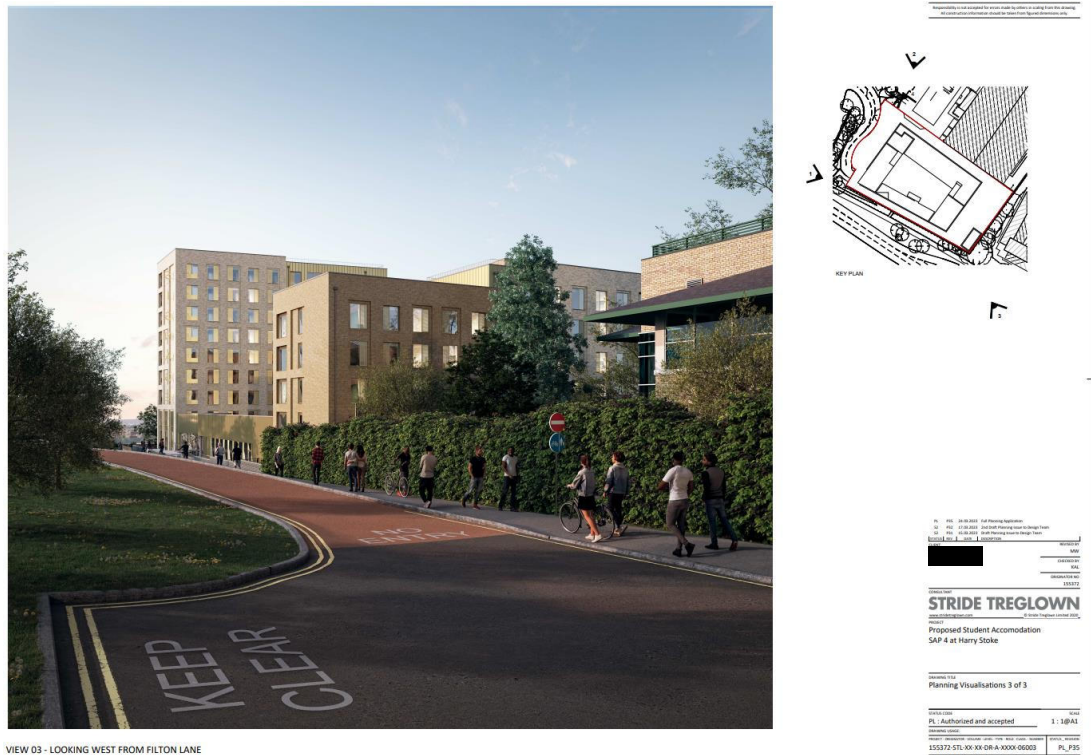
<sup>2</sup> Mead Realisations Limited v The Secretary of State for Levelling Up, Housing and Communities & Anor [2024] EWHC 279 (Admin)

---

**Image 4 – Approved Site Location Plan for P23/01232/F**



**Image 5 – Approved Visualisation for P23/01232/F**



VIEW 03 - LOOKING WEST FROM FILTON LANE



4.4 As can be seen from the two images, the architects of the student accommodation scheme are Clifton based Stride Treglown. Stride Treglown were also architects for the other major development scheme<sup>3</sup> affecting the other end of Fox Den Road, that which is currently under construction and described as:

*'Erection of mixed-use development comprising of Hotel and Restaurant, Supermarket, Coffee Shop with Drive Thru Facility and multi-use building (comprising flexible combinations of Use (Class A1) shops, (Class A2) financial and professional, (Class A3) food and drink, (Class A5) hot food takeaways.'*

4.5 A recent photograph of the scheme is provided below. The retail terrace can be seen in the background to the right hand side.

**Image 6 – Photo of Fox Den Road scheme under construction (P20/05916/F)**



4.6 As was recognised in a recent site meeting with [REDACTED] there are massing similarities between the two (recently approved) developments. At the meeting – held within the enclosed land forming the old B&Q

---

<sup>3</sup> Ref. P20/05916/F

garden centre in order to view and consider sample materials for the PBSA scheme – it was recognised that the two schemes, once completed, will bookend this part of the District Centre. It was discussed that the retail terrace would be a somewhat incongruous form of development compared to those at either end, both in terms of massing and architectural language. In terms of massing, it is clear that the retail terrace does not make for a particularly efficient use of land.

4.7 In order to rectify the above and support the Council’s wider local plan aspirations, including the delivery of housing, [REDACTED] seeks to enter into dialogue with policy officers in order to discuss its longer-term aspirations for the retail park. It is considering options, subject to a number of considerations (including matters relating to tenancies and phasing), to provide a masterplan to redevelop it in order to provide main town centre uses<sup>4</sup> at ground floor level with residential development provided above. This will fulfil the existing development plan objective to provide a vertical (as well as horizontal) mix of uses within Stoke Gifford Town Centre. The development would be in the form of a flatted development (circa 200-300+ units<sup>5</sup>), perhaps in a series of mid-size towers and, of course, not necessarily on the footprint of the existing retail terrace. **Whilst full details of residential unit numbers and timescales are yet to be fully assessed, there is clear benefit in close engagement with the Council in the spirit of collaborative engagement to assist in the plan-making process to ensure that any allocation is suitable<sup>6</sup>.**

4.8 As well as the adopted development plan, [REDACTED] future vision for the retail park is supported by the NPPF and Practice Guidance. First and foremost the site is

---

<sup>4</sup> As so defined in Annex 2 of the NPPF

<sup>5</sup> We have referred to South Gloucestershire Council Density & Character Study January 2022 to give an indication of possible unit numbers. It identifies on page 97 a minimum and higher density range of 80-120 dph. The retail park (excluding area NF011) is circa 2.5ha, equating to 200-300 units. It is noted that the 120dph is not a maximum. **It is possible that the site could potentially deliver a far greater number of residential units.**

<sup>6</sup> This was agreed as a suitable way forward in a conversation held with [REDACTED] on 16<sup>th</sup> February 2024.

---



in a highly sustainable town centre location with an expanding range of services and nearby employment opportunities. It is also very well connected<sup>7</sup>. These were all matters recognised in the committee reports for both of the above-referenced planning applications. As was set out in the Planning Statement in support of the student accommodation scheme, [REDACTED] had previously recognised Stoke Gifford Town Centre to be in an inherently sustainable location for the provision of a residential population and that a student population would help in the creation of ‘community’ for the benefit of the long-term prosperity of the allocated centre. This supports paragraph 90, subsection f) of the NPPF, which sets out the Government’s recognition that planning policies should:

*‘Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.’*

4.9 Paragraph 001 The Practice Guidance on *Town centres and retail* is titled ‘Planning for town centre vitality and viability’ and recognises the value that a resident population can bring to centre vitality and viability:

*[...] A wide range of complementary uses can, if suitably located, help to support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. The same is true of temporary activities such as ‘pop ups’, which will often benefit from permitted development rights. **Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services.** Given their close proximity to transport networks and local shops and services, local authorities may wish to consider locating specialist housing for different groups including older people within town centres or edge of centre locations. [...]*

---

<sup>7</sup> The Density & Character Study January 2022 recognises that Stoke Gifford ticks the maximum four boxes for (1) Railway Connection, (2) Rapid Transport (Metrobus), (3) Good Bus Provision & Travel Times and (4) Strategic Cycle Route Connections.

---

4.10 The provision of residential accommodation at the retail park would promote the three strands of sustainable development, namely:

**The Economic Objective**

- By increasing footfall at the retail park and elsewhere within the town centre;
- Enabling a diversity of uses through increased residential population; and
- By providing a customer base for those main town centre uses.

**The Social Objective**

- By support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations;
- By fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- By promoting activity and movement within the town centre outside of the normal opening hours of the retail warehouses, for example by promoting the evening economy.

**The environmental objective**

- By being in a truly sustainable location. Apart from being immediately adjacent to a range of town centre facilities, the site is extremely well-connected to the surrounding areas through sustainable modes of transportation including, the cycle network, bus and Metrobus network, Bristol Parkway and Filton Abbey Wood railway stations;
- By being provided on previously developed/under-utilised land; and
- Through being a form of development that could be provided as higher density development with a potential vertical emphasis.

4.11 In conclusion to this section, the provision of mixed-use residential development above/alongside main town centre uses would be supported by the current development plan, the NPPF and Practice Guidance.

**5. Response to Phase 3 Consultation Document**

5.1 Page 31 of the consultation document sets out a need for 9,653 new homes over the fifteen year plan period. It identifies that 300 are likely to come forward on small windfall sites, 1,540 on urban allocations and 7,813 on new greenfield allocations. Options for the delivery of the urban allocations are provided in chapter 4 of the consultation document. Under the heading ‘Making the most effective use of land in built-up areas’, it sets out the Council’s strategy:

*‘..to make the most effective use land in our already built-up areas by optimising density of and new development or redevelopment. Optimising means achieving more, well-designed homes or businesses on each site, whilst respecting the local area’s prevailing character and setting, and taking account of the amenity of existing residents. A key element is to locate higher density development in places where local facilities and public transport are available, within or close to our town centres, high streets, and transport hubs.’<sup>8</sup>*

5.2 The future aspirations for Filton Retail Park sit very neatly alongside this strategy.

5.3 Proposed site allocations in urban areas and market towns are provided in Table 1 and on an interactive map. Paragraph 4.14 identifies that, since the Local Plan Phase 2 consultation, a number of other potential sites have fallen away for a variety of reasons, including that planning permission has been granted. Despite this, NF011 remains in Table 1 and the interactive plan as being capable of delivering 132 new homes. **As the site is to be built out as a 330-bed PBSA development, it should be removed as this part of the retail park will not be able to deliver any new homes.**

5.4 Chapter 5 of the consultation document is titled ‘Towards an emerging preferred strategy’. Stoke Gifford is located within the area identified as Urban Edge of the Bristol North Fringe. Paragraph 5.52 identifies how:

---

<sup>8</sup> Paragraph 4.2

*'The Bristol North Fringe is a key service centre that supports both the communities of the North fringe and wider district giving access to services and facilities not available elsewhere as well as being home to a substantial employment sector including Cribbs Causeway Shopping Mall, The University of the West of England, a large engineering base as well as many other successful businesses. Locating homes in proximity to this key area will support our objectives to ensure new communities have local access to jobs, services and facilities and are not encouraged or required to travel long distances to access these...'*

5.5 The provision of homes within Stoke Gifford Town Centre is supported by the above factors.

5.6 Chapter 6 of the consultation document explores three different strategy 'lenses' for the provision of new housing and jobs:

- Lens 1 – No Green Belt loss
- Lens 2 – Urban edge
- Lens 3 – Transport corridors and hubs

5.7 Under Lens 1, development is focused on those areas to the north the Green Belt boundary, including a new garden village at Buckover. Lens 2 seeks development closer to the North and East Fringes of Bristol on Green Belt sites. Lens 3 includes land within and to the north of the Green Belt. [REDACTED] aspirations for the future delivery of homes at Filton Retail Park will assist in alleviating pressure on these areas given that the site falls within, and does not require amendments to, any existing Settlement Boundary.

5.8 Support for [REDACTED] future strategy for change at Filton Retail Park is also underpinned by the Government's support for sustainable development. The latter is clear from the description of the area in the above quotation, including the site's access to jobs, services and its general connectivity. Focusing additional housing growth within an established town centre within an existing Settlement Boundary (as identified on the interactive maps) will assist in alleviating pressure on the Green Belt and greenfield land in order to deliver growth.

---

5.9 **We therefore request that draft allocation NP011 be deleted and a new draft allocation for the remainder of the retail park (as illustrated on the site location plan provided at Appendix 2) be considered through collaborative dialogue for its future redevelopment to provide circa 200-300+ (to be discussed) residential units incorporating active ground floor main town centres uses and wider improvements to public realm.**

5.10 Chapter 3c of the draft document is titled ‘Planning for town centres’. We have already given reference in paragraph 1.6 to the proposed changes to the boundary of the Primary Shopping Area to remove that which is subject to the approved PBSA scheme and the inclusion of the Aldi supermarket, currently under construction towards the other end of Fox Den Road. [REDACTED] **is supportive of these changes given the definition<sup>9</sup> in Annex 2 of the NPPF.**

5.11 In terms of the wording of the draft policy titled ‘Town Centres’, section 6 is drafted as follows:

*‘...6. Both within designated Primary Shopping Areas and wider town centre boundaries, new residential development which makes positive use of underused and/or vacant upper floors will be encouraged provided they would not, individually and/or cumulatively, have a detrimental impact upon adjoining commercial uses nor the vitality and viability of the wider town centre...’*

5.12 The following changes to part 6 of the policy are suggested in order to support [REDACTED] aspirations for the site and to enable new development, as well as existing, to deliver residential development. Whilst the policy, as drafted, does not preclude new development in Primary Shopping Areas and town centres to also provide residential development (as supported by the NPPF and Practice Guidance), formal recognition through the suggested amendments in bold, below, would remove any doubt.

---

<sup>9</sup> Primary shopping area: Defined area where retail development is concentrated.

---

*'6. Both within designated Primary Shopping Areas and wider town centre boundaries, new residential development, **including that** which makes positive use of underused **land and underused** and/or vacant upper floors will be encouraged provided they would not, individually and/or cumulatively, have a detrimental impact upon adjoining commercial uses nor the vitality and viability of the wider town centre.'*

- 5.13 The latter part of the text will continue to ensure that new build residential will need to be delivered without harm to vitality or viability and to enable an effective balance to be made between the delivery of homes and main town centre uses.
- 5.14 Finally, Table 1 of the supporting text to the draft policy sets out a Hierarchy of Centres. Stoke Gifford is identified as one of four Town Centres within the North Fringe of Bristol Urban Area. [REDACTED] **is supportive of this recognition.**

## 6. Conclusion

- 6.1 [REDACTED] welcomes the opportunity to contribute towards the new Local Plan for South Gloucestershire. [REDACTED] is a major stakeholder in one of the current identified District Centres serving the North Bristol Fringe and is soon to deliver a major PBSA scheme on underused land forming part of the retail park, facing Filton Road and in a location close to UWE's Frenchay Campus.
- 6.2 Stoke Gifford Town Centre is currently undergoing major change through delivery of the student accommodation scheme, the Premier Inn hotel, the Aldi supermarket, the Costa unit and the multi-use building. [REDACTED] seek to deliver additional change to further enhance the vitality and viability of the Town Centre.
- 6.3 [REDACTED], in supporting student accommodation at the retail park, recognises the benefit of providing 'community' and the positive effect that a residential population has on footfall and dwell-time. Its future aspirations seek to build on this recognition by providing additional residential units in a flatted development that incorporates main town centre uses. This will ease pressure on the delivery of housing on greenfield sites, including the Green Belt, and promote a move away from low density big box style of retailing. This will make a more efficient use of land and deliver a more architecturally satisfactory form of development for the area that will be bookended by the new developments at either end. Minor tweaks to the draft Town Centre policy are proposed to assist in the delivery of these aspirations.
- 6.4 As highlighted in the representations, it is necessary to remove draft residential allocation NF011, as this appears to be an anomaly. This will mean that fewer residential units are capable of being provided in this part of the Bristol North Fringe on allocated sites. They can, however, be offset by [REDACTED] future aspirations.



6.5 Please be advised that these aspirations are at the very earliest stage and full details are yet to be established. They will be the subject of a number of variables. With this in mind we would welcome the opportunity to engage directly with the Council to discuss these opportunities in order to ensure that they provide a suitable fit for both [REDACTED] and the Council and in advance of formal drafting of any allocation.

**February 2024**

Copyright © All rights reserved.

NTR Planning Ltd.



**Small Planning Consultancy of the Year London 2022**