

**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

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.

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
- Site Map with a clear line boundary to outline the site promoted for development
- Proof of Land ownership/Proof of support from Landowner – **SEE LETTER APPENDED**

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 - **YES**
- 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) **REPRESENTATIONS TO THE LOCAL PLAN REG 18 CONSULTATION. TECHNICAL REPORTS AND**

ASSESSMENTS ARE IN PROCESS (TRANSPORT / HIGHWAYS, ECOLOGY, LANDSCAPE, TREES, DRAINAGE AND FLOOD RISK) AND WILL BE SUBMITTED WITH OUR REG 19 REPS AND FORTHCOMING PRE-APP SUBMISSION.

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.

2. 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
(Click on the site to see the site reference number and information previously submitted).

Date of submission

No, but we have had two initial pre-application meetings with officers at SGC.

		Please enter the relevant Site Reference number from www.southglos.gov.uk/callforsites
Has this site previously been submitted?	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?

--

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

3. YOUR DETAILS

Name

[Redacted]

Company/Organisation
(if applicable)

[Redacted]

Address

[Redacted]

Telephone

[]

Email

[Redacted]

Status (please tick all that apply)

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

[]

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 [Y] 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)?

[]

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

Yes [Y]

No []

4. SITE DETAILS

Site Address (including postcode where applicable)

Aviva Centre

Site Area (Hectares)(if known)

12.67 ha

Current land use(s)

Occupied and vacant employment floorspace, car parking, and significant landscaped areas and lake

Adjacent land use(s)

Residential and employment

Relevant planning history (if known)

- P87/1060: Comprehensive development on approximately 40.7 hectares (100.65 acres) to include residential, retail, office and employment uses, petrol filling station and ancillary works including construction of distributor road (outline) (in accordance with the letter and plans received by the council on 17th February 1987). Approved 22/06/1987.
- P93/1527: Erection of office building complex totalling 580,000 square feet in floor area (as defined in class B1 of the town and country planning (use classes order 1987) construction of new roads, car parking and landscaping works. Approved 14/07/1993.

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		Up to 400
Residential – Self-Build and Custom-Build		Potential for policy compliant self or custom build housing, subject to viability.
Gypsy and Travellers / Travelling Showpeople sites		n/a

USE		Specify (Wind, Solar, Other)
Renewable Energy		

USE		Floorspace (m ²) / number of floors/pitches / notes
Office, research & development, light industrial (B1)		154,000 sq ft subject to future review
General industrial (B2) / warehousing (B8)		
Sports / leisure (please specify)		
Retail		
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.)?	No	
Is the site subject to flooding?	No	The existing lake provides attenuation and will be retained
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	No	
Is there a possibility that the site is contaminated?	No	
Can satisfactory vehicular access to the site be achieved?	Yes	
Has the Highways Agency been consulted?	No	
Is the site subject to any other key constraints?	No	

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 checked="" 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)?	No	
Must land off-site be acquired to develop the site?	No	
Are there any current uses which need to be relocated?	No	
Is the site owned by a developer or is the owner willing to sell?	Yes	

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
Y		

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

The site is able to come forward without delay subject to the appropriate planning consent.

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.	No	
Does the site require significant new infrastructure investment to be suitable for development? If yes, please specify.	No	
Are there any issues that may influence the economic viability, delivery rates or timing of the development? If yes, please specify.	No	
Has a viability assessment / financial appraisal of the scheme been undertaken?	Yes	
Have any design work studies been undertaken?	Yes	A vision document has been prepared, and technical reports and assessments are in process (transport / highways, ecology, landscape, trees, drainage and flood risk) and will be submitted with our reg 19 reps and forthcoming pre-app submission.

9. ADDITIONAL COMMENTS

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

See supporting representations.

Completed forms, site location plans, Landownership proof and any supporting information should be emailed to:
policy.consultation@southglos.gov.uk.

M&G Real Estate Limited
10 Fenchurch Avenue
London EC3M 5AG

mandg.com/realestate
T 020 7548 6600



South Gloucestershire Council – by E-mail only
policy.consultation@southglos.gov.uk

Email: [REDACTED]

15 February 2024

Dear Sir/Madam,

Re South Gloucestershire Council Call for sites

Please accept this letter as proof of land ownership for the site known as The Aviva Centre/Lake View being submitted as a call for site by Knight Frank acting for M&G. The site is owned by Prudential Real Estate Investments 1 which is a wholly owned subsidiary of Prudential Assurance Company Limited for whom M&G acts as investment manager.

Yours sincerely

[REDACTED]

[REDACTED]

Director, M&G Real Estate Limited

South Gloucestershire Local Plan 2023 – Phase 3 Consultation

Lake View / Aviva Centre

Prepared on behalf of M&G Group

12 February 2024

Public

KF Ref: 1272

Quality Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by the Originators and approved by a Partner or Associate.

Date	Originator		Approved	
12 February 2024	Name	Faith Beeson-Wright	Name	William Dale
	Position	Partner	Position	Associate

Limitations

Unless you are the Client named within this report, or have been explicitly identified by us as a party to whom we owe a duty of care and who is entitled to rely on this report, Knight Frank LLP does not owe or assume any duty of care to you in respect of the contents of this report and you are not entitled to rely upon it.

Further, and without prejudice to the above, Knight Frank accepts no responsibility or liability for the consequences of this document being used for any purpose other than for which it was commissioned.

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1. Introduction

- 1.1 These representations have been prepared by Knight Frank LLP (“the agent”) on behalf of our client, M&G Group (“our client”). M&G Group is the owner and asset manager of the Aviva Centre / Lake View in north Bristol (“the site”). Our representations are prepared in response to the South Gloucestershire Council (“SGC”) Local Plan Phase 3: Towards a Preferred Strategy Regulation 18 Consultation (November 2023).
- 1.2 Our representations seek to establish the site as a potential mixed-use development opportunity, which SGC are encouraged to include within the Local Plan. The site conforms with the wider principles of the Urban Lifestyles approach consulted on within earlier Local Plan consultation material and provides an opportunity to make efficient use of brownfield land on the northern edge of Bristol.
- 1.3 Paragraph 35 of the NPPF (2023) sets out the tests of soundness which local plans will be examined against; these are:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.4 These representations are prepared within the context of the tests of soundness of the NPPF set out above and assess whether the draft policies proposed within the draft SGC Local Plan comply with these and, ultimately, whether the plan is ‘sound’.

2. The Site - Lake View / The Aviva Centre

Site context

- 2.1 The Lake View site is an existing employment site in Stoke Gifford (also known as the “Aviva Centre”, or formerly the “AXA Centre”). It is immediately south of Bristol Parkway Railway Station, and west of the new residential development of Harry Stoke.
- 2.2 The site is within the north fringe of Bristol, within the urban conurbation of the city of Bristol (see Figure 1 below for a site location plan).

Figure 1: Site Location Plan



- 2.3 The site is identified within SGC’s North Fringe of Bristol Masterplan (2022), which sets out a place-based vision and infrastructure strategy for the area over the next 30 years. It is also identified within SGC’s Parkway Station and Surrounds Masterplan (2022), which includes a vision for improving the station and the surrounding area and how it can become a gateway to the North Fringe of Bristol and whole of South Gloucestershire.
- 2.4 The site is located within 5.3 miles of M4 Junction 19 and 2.1 miles of M5 Junction 16, an approximate five- and nine-minute journey by car, respectively. Proximity to the M4 and M5 results in a site that is well-positioned for commuting, with Cardiff, Newport, Bath, Swindon and Reading (amongst others) accessible within an hour or less by road. The site is located within a 0.2 mile (circa three minute walk) of Bristol Parkway railway Station, which offers regular local, regional and inter-city railway services to London and other destinations across the UK. The site is also within walking distance of Filton Abbey Wood railway station.
- 2.5 The site is bound by a public highway comprising Brierly Furlong to the northwest, Church Road to the north, Westfield Lane to the east, Great Stoke Way to the south and Fox Den Road to the southwest. Vehicle access is taken from Brierley Furlong and Westfield Lane, with numerous pedestrian accesses adjoining the northern and southern extents of the site.

- 2.6 All adjoining access roads offer extensive pedestrian and cycle infrastructure, including formal crossing points, segregated cycle lanes, street lighting and sheltered bus stops. The Stoke Gifford area is well served by numerous existing bus routes, offering regular public transport access to locations across Bristol, South Gloucestershire and the South West of England.
- 2.7 The site is surrounded by a mix of land uses, including the University of the West of England Campus, Abbey Wood Retail Park, Filton Retail Park, Parkway Business Park, SGS College, Bristol Business Park and the residential areas of Harry Stoke, Filton and Stoke Gifford

Site description

- 2.8 The building was purpose-built for AXA in 1990, which explains the bespoke design and layout. The site comprises a large office building that is underused as a result of the declining demand for out-of-town office space. Despite the good public transport links, a large area of the site is covered with car parking. This type of context responds to the typical construction of out-of-town centre purpose-built headquarters office buildings constructed in the seventies, eighties and nineties. Many of these buildings are now seeking alternative solutions to diversify their offer, ensuring efficient use in response to market demands for smaller volume, high-quality office space in city centre locations.
- 2.9 The buildings sit within pleasant, landscaped grounds, including a large lake. The building is arranged over a number of wings around a central covered street and comprises offices, a gym, indoor leisure facilities, a café and other associated ancillary commercial facilities. The site measures approximately 12.67ha (31.32 acres).
- 2.10 See Figure 2 below for the existing site plan.
- 2.11 As is typical of purpose-built buildings of this era, there are many elements included in the design that are unlikely to feature within contemporary speculative office development. In addition, today's occupier market and corporate targets (including EPC B, BREEAM, next zero, and Nabers) are difficult to achieve without significant capital expenditure, especially in an out-of-town location that cannot command high rents. There has been a decline in the interest of out-of-town office space over the last few years for various reasons, especially second-class office space. Within this context, the landowner, whilst respecting existing commercial interests, is presenting this site for alternative and mixed-use development.

Figure 2: Existing site plan



Planning history

2.12 The site has been subject to the following relevant planning applications as set out in the table below.

Table 1: Site Planning History

Application Reference	Description	Decision and Date
P87/1060	Comprehensive development on approximately 40.7 hectares (100.65 acres) to include residential, retail, office and employment uses, petrol filling station and ancillary works including construction of distributor road (outline) (in accordance with the letter and plans received by the council on 17 th February 1987).	Approved 22 June 1987
P93/1527	Erection of office building complex totalling 580,000 square feet in floor area (as defined in class B1 of the town and country planning (use classes order 1987) construction of new roads, car parking and landscaping works	Approved 14 July 1993
PT99/0307/PN1	Installation of 4 sectored antennae and single small microwave dish	Approved 24 December 1999
PT02/0776/F	Erection of temporary offices to form additional accommodation associated within existing use	Approved 14 May 2002

2.13 As is evident from the above planning history, the site has not been subject to significant planning applications since permission was granted for the existing office complex in the 1990's. However, of note is the 1987 planning permission approved an element of residential development at the site.

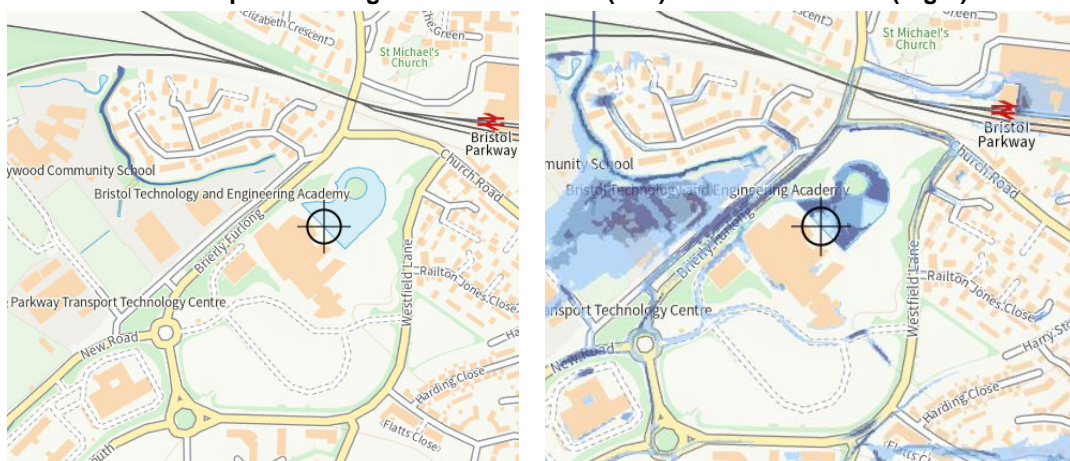
Designations

2.14 The site lies within a safeguarded area for economic development as designated by SGC in their adopted and emerging Local Plan. Other than the employment designation, the site is unconstrained from a planning perspective, with no environmental or heritage designations. Existing green infrastructure and trees will be considered and enhanced throughout our client's development proposals for the site.

Flood Risk

2.15 Flood risk mapping provided by the Environment Agency indicates that the site lies wholly within Flood Zone 1 (lowest risk of flooding from rivers or the sea), with limited areas of surface flood risk dispersed throughout the site.

Figure 3: Flood Risk Maps - Flooding from Rivers or Sea (Left) and Surface Water (Right)



- 2.16 These flood risk maps demonstrate that the on-site pond/lake provides an important surface water attenuation feature both for the site and surrounding development and will therefore be retained as part of any forthcoming development proposals.

3. The Opportunity at Lake View / The Aviva Centre

- 3.1 Our client's site at Lake View / the Aviva Centre provides a pivotal opportunity to assist South Gloucestershire Council and the West of England Combined Authority in meeting future housing and employment needs. As part of a mixed-use development, the site can meaningfully contribute up to 400no. dwellings and significant employment floorspace. The site is identified as a sustainable location, close to Parkway railway station, with access to many local services and facilities.
- 3.2 The site is within the North Fringe of Bristol, an area identified by SGC as a transformative part of the region. This presents an opportunity to deliver regeneration and new homes not only for South Gloucestershire but the wider Bristol conurbation in a sustainable location well served by jobs, education, services, and transport links. The Council's position on providing a policy framework to make the most effective use of land, facilitating future regeneration, providing more homes and jobs where land comes forward is strongly supported.
- 3.3 The North Fringe of Bristol Masterplan envisions transforming the area, building on the aerospace, logistics, retail, leisure, and emerging tourism sectors. It aims to create new possibilities, enhance the West of England economy, and generate new jobs and skills across the area. The Parkway Station and Surrounds Masterplan include a vision for improving the station, making it a gateway to Bristol, enhancing the efficiency of large car parking areas and improving South Gloucestershire's prosperity.
- 3.4 As shown on the appended illustrative masterplan, the site presents the opportunity to redevelop the partially vacant site and surplus car parking in a sustainable location and through brownfield development. Our proposed masterplan for the site presents the following key benefits:
- Over 400 homes, including affordable homes, creating a new neighbourhood for modern urban living.
 - Opportunity for alternative employment generating development, including light industrial.
 - Public open space – a green network for people to enjoy, connect and enhance ecological benefits reflective, harnessing the existing green infrastructure at the site.
 - A 15-minute neighbourhood – a sustainable approach with pedestrian and cyclist permeability to better connect communities and links to Bristol Parkway Railway Station.
 - Unlocking the north and south connection – removing barriers with greater accessibility and integration of the site.
 - A space to live, work and visit – a sustainable mixed-use development comprising commercial, retail, employment, residential uses and accessible open spaces.
- 3.5 The site is suitable, viable and available for mixed-use development, and it should be allocated as such in the SGC Local Plan. To date, our client and their consultant team have had positive discussions with the planning team at SGC about the significant opportunity to deliver sustainable development at this brownfield site.

4. Response to the Local Plan Consultation Document

Section 2 - Priorities and Objectives for the Plan

4.1 The draft local plan's objectives are as follows:

Objective 1 – New homes for all communities	<p>Ensure that a range of differently sized sites for new homes are planned for in sustainable locations across South Gloucestershire to deliver and maintain a rolling 5 year supply of housing.</p> <p>Make effective use of land by optimising density in sustainable and appropriate locations.</p>
Objective 2 – Travel and transport	<p>Locate new homes in places where employment, key services and facilities are easily accessed by walking, cycling and wheeling and effective public transport, or where these are capable of being provided as part of the new development.</p> <p>Locate small and proportionate development within and around existing, suitable villages and settlements to support their future vitality as well as existing services and facilities, in particular rural primary schools.</p>
Objective 3 – Climate, nature and heritage	<p>Increase resilience to climate change impacts and threats, including buildings, infrastructure, and the natural environment.</p> <p>Recognise the impact of locational decisions on both the causes and consequences of climate change, including risk of flooding.</p> <p>Protect and enhance the character, distinctiveness, quality and intrinsic features of the natural and historic environment.</p> <p>Establish, maintain and enhance the function and connectivity of green infrastructure and Nature Recovery Networks for all communities and achieve at least 10% biodiversity net gain in new developments.</p> <p>Protect existing trees and increase tree cover, new tree-planting and require the replacement of trees lost to development.</p> <p>Ensure access to high quality green infrastructure, nature rich habitat and open spaces, for all communities, including urban communities.</p> <p>Work to achieve net zero by significantly increase renewable and low-carbon energy generation including through community energy projects.</p>
Objective 4 – Design and place-making	<p>Create a positive sense of place by responding to key natural, built, historic and landscape assets and character of both the local landscape and townscape to create high-quality developments.</p> <p>Require zero carbon, energy-efficient building design and construction and support retrofitting to reduce energy bills, decarbonise heating and adapt to climate change.</p> <p>New homes and infrastructure should be adaptable and accessible to cater for households whose needs may change over time, and for the ageing population.</p> <p>Optimise the quality, density and range of uses in all new development, with higher density in the most accessible locations.</p> <p>Ensure new homes and workplaces provide high quality private outdoor space and internal layouts, with positive residential amenity, including suitably sized new homes.</p> <p>Streets and areas of public realm should be safe, functional, accessible and attractive, with new streets being tree lined.</p>

Objective 5 – Jobs and businesses	<p>Plan for a better balance between local jobs and resident workers in all communities, recognising the need for more employment opportunities in the communities of Bristol East Fringe urban area and the economic and environmental benefits of avoiding the need for long distance commuting.</p> <p>Plan for the employment land required to meet evidence-based need on existing and new sites.</p> <p>Support a 'green' economic recovery through the growth of green technology and businesses which contribute to carbon reduction.</p> <p>Ensure safeguarded employment areas are flexible and attractive to accommodate businesses of all sizes, including key local sectors in a rapidly changing economic and retail environment.</p> <p>Rethink town centres and high streets, in terms of what they offer and how they operate, delivering local regeneration which contributes to positive and inclusive development and change.</p> <p>Plan for mineral working to ensure a steady and adequate supply of aggregates.</p>
Objective 6 – Deliverability and viability	<p>Direct development to those locations well-served or capable of being well served by existing utilities and infrastructure.</p> <p>Ensure that the delivery of new development is supported by the timely provision of all necessary infrastructure and that that the development industry plays its role in providing infrastructure.</p> <p>Safeguard land for infrastructure and renewable energy where necessary.</p> <p>New development should enable and support the long-term success and sustainability of schools, sports and community infrastructure and public open spaces and areas identified for biodiversity net gain.</p> <p>Build on and enhance digital connectivity across the area.</p> <p>Infrastructure for alternative-fuel vehicles should be available in new developments.</p>

- 4.2 The overarching objectives of the Local Plan (see table above) are broadly supported insofar as they align with the three strands of sustainable development set out in Paragraph 8 of the NPPF (2023). Whilst the strategic objectives are broadly supported, the Council should ensure that policies within the Plan provide clear and guidance on how development proposals can deliver on these objectives.
- 4.3 Objective 1: 'New Homes for all Communities' is particularly relevant to our client's site. This objective recognises the need to ensure everyone has access to a good quality, safe, and sustainable home by allocating sites to deliver a sufficient supply of homes. The Council's position on maintaining a rolling 5-year supply of housing and making effective use of land by optimising density in sustainable and appropriate locations aligns with the provisions of the NPPF and is supported. Our client's site in the North Fringe of Bristol presents a significant opportunity to contribute to this objective, with the potential to deliver both new homes and employment floorspace. The Council should ensure that there remains a robust policy basis to allow these areas to grow and develop if they do not intend to allocate the site or remove its employment designation. The second housing objective is to ensure deliverability by providing a range of small and large sites in sustainable locations and is supported in principle.
- 4.4 It is important to address wider regional and sub-regional housing needs when setting the housing objectives for South Gloucestershire. The Plan should make clear that it seeks to meet identified needs as a minimum and assist neighbouring authorities where possible.
- 4.5 Objective 2: 'Travel and Transport' is supported in the context of this site and provides a basis for higher density and mixed-use development given its sustainable location. As previously stated, the site comprises a highly sustainable location within immediate proximity of South Gloucestershire's gateway railway station. This objective

should recognise the masterplanning documents that have been produced by South Gloucestershire to date and seek to build on the principles established within these documents.

- 4.6 Regarding Objective 3 and the requirement for 10% BNG in new development, the Local Plan and any forthcoming SPDs should align with the provisions of the Environment Act and other national guidance and policy which has been (or is due to be) released. The underlying reason for this legislative reform is to provide certainty, and therefore, the Council's policy approach should not deviate or conflict with that of the Government unless there is overriding justification to do so. Dependent on timescales for adoption of the Local Plan, it may be necessary for it to take account of the proposed 2-year transitional arrangements for the introduction of the new legislation whilst adhering to the forthcoming national guidance and policy that will apply to development within the LPA area. The Local Plan process should also undertake financial viability testing as to the effects of any additional policy requirements for biodiversity and BNG delivery. In the context of Lake View, the sub-objectives are supported, and it is considered that the site could deliver against them.
- 4.7 Objective 4: 'Design and Place-making' is broadly supported. However, design and sustainability policy should be supported and informed by robust viability assessment. The sustainability of homes, commercial buildings and their built fabric should largely be controlled by building regulations. Any design and placemaking provisions must ensure they do not impact housing or commercial development delivery contrary to the overarching objectives of the Local Plan. The approach to optimising the quality, density and range of uses in all new developments, with higher density in the most accessible locations, is supported. The Council should consider stating that the target number of dwellings in each site allocation is a minimum to ensure efficient use of land.
- 4.8 Objective 5: 'Jobs and Businesses' are broadly supported. To ensure that the out-of-town office environment remains attractive and that existing stock is modernised, the Council is encouraged to seek strategies to enhance the vibrancy of these areas and aim to attract business investment by fostering an appealing environment. This is often achieved by allowing mixed-use development, enhancing connectivity, creating opportunities for developers to deliver high-quality placemaking and design, allowing flexible and diverse commercial practices, and ensuring policies are sufficiently flexible to incentivise development and innovation.
- 4.9 Objective 6: 'Deliverability and Viability' needs to consider the requirements for viability itself. This objective focuses on the deliverability of infrastructure as part of new developments and ensuring that developers contribute toward its provision. The aim should realise that not all development sites can contribute against all objectives in the Local Plan due to well established viability and cost issues. It should be mentioned that plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724), assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable, and therefore, flexibility in the amount of affordable housing and infrastructure sought may be needed to deal with site-specific issues on a case-by-base basis.

Section 3 – Building a New Strategy

National Planning Policy Framework

- 4.10 NPPF paragraph 11 b) states:

“Strategic policies should, as a minimum, provide for objectively assessed needs for housing [and other uses], as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework¹ that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 4.11 Accordingly, when planning for housing, the LPA must first objectively assess the housing needs of their area. Their plan should then seek (as a minimum) to meet those needs in full, together with any unmet needs of neighbouring areas, unless any of the factors referred to in NPPF 11 b) i. or ii. prevent them from doing so.
- 4.12 Neither the phrase “as a minimum” in NPPF 11 b), nor the objective of “significantly boosting the supply of homes” in NPPF 60, places any obligation on LPAs to provide for more than their objectively-assessed need. Instead, NPPF 11 b) enables LPAs to provide for more than their objectively-assessed need, if they choose to do so.
- 4.13 NPPF Paragraph 60 states:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

4.14 The NPPF’s policies, taken as a whole, provide the means by which these objectives are to be met.

4.15 NPPF Paragraph 61 states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

4.16 NPPF Paragraph 85 states that:

“Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

4.17 NPPF Paragraph 87 states that:

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

Site Policy Context

4.18 The emerging SGC Local Plan sets out two steps as part of the emergent spatial strategy, these are:

- Step 1: new homes and jobs in urban areas and market towns.
- Step 2: strategy lenses and sites.

4.19 The Local Plan has identified that the standard method housing requirement for the plan period is 20,490 homes. Removing existing commitments leaves a housing requirement of 9,653 new homes. The principle approach of seeking to meet SGC’s standard method target in full is strongly supported. In addition, the following demand is stated for traditional employment floorspace –

- 59,000-167,000 sq. m floorspace of office/ research and development (R&D);
- 30 hectares (ha) of land for industrial; and
- 105 ha of land for warehousing and logistics.

4.20 As part of Step 1, the Lake View site is identified as being within an “area with potential for evolution and change”. SGC describes these areas for evolution and change as those with opportunities for regeneration as has been identified through SGC’s approved masterplans. These sites are not shown as allocations or included as commitments in SGC’s housing trajectory due to uncertainty over their capacity to deliver new housing within the first ten years of the Local Plan period. However, they do form a pipeline of sites that are expected to make a

significant contribution to SGC's housing needs during the plan period. These representations promote the Lake View site and confirm that the site can make a meaningful contribution to SGC's housing and employment delivery within the next ten years. It is therefore appropriate for the site to be included in SGC's housing commitments and allocations. This approach will ensure that these sites are ultimately delivered and the benefits of regeneration these master planned areas are realised; SGC needs to make provisions in the plan to support this. This support needs to be provided through a robust policy framework, providing landowners certainty when developing proposals.

4.21 Although broad support for the two-step approach is given the Local Plan must acknowledge the known challenges of brownfield development as proposed by Step 1 of the strategy. Brownfield development faces significantly more viability and delivery challenges than in previous years, with significant increases in build, labour, and material costs, coupled with the already high costs of remediation and demolition of brownfield sites. To acknowledge this, SGC should consider increasing the proposed housing requirement in Step 2 of 7,813 new homes and include a contingency percentage supply to account for the likely under-delivery of homes through Step 1.

4.22 In line with the proposed spatial approach in the emerging Local Plan and areas for change and evolution, two adopted masterplans cover the site – the Parkway Station and Surrounds Masterplan and the North Fringe of Bristol Strategic Infrastructure Led Masterplan. A summary of these two SPDs is provided below.

North Fringe of Bristol Strategic Infrastructure Led Masterplan

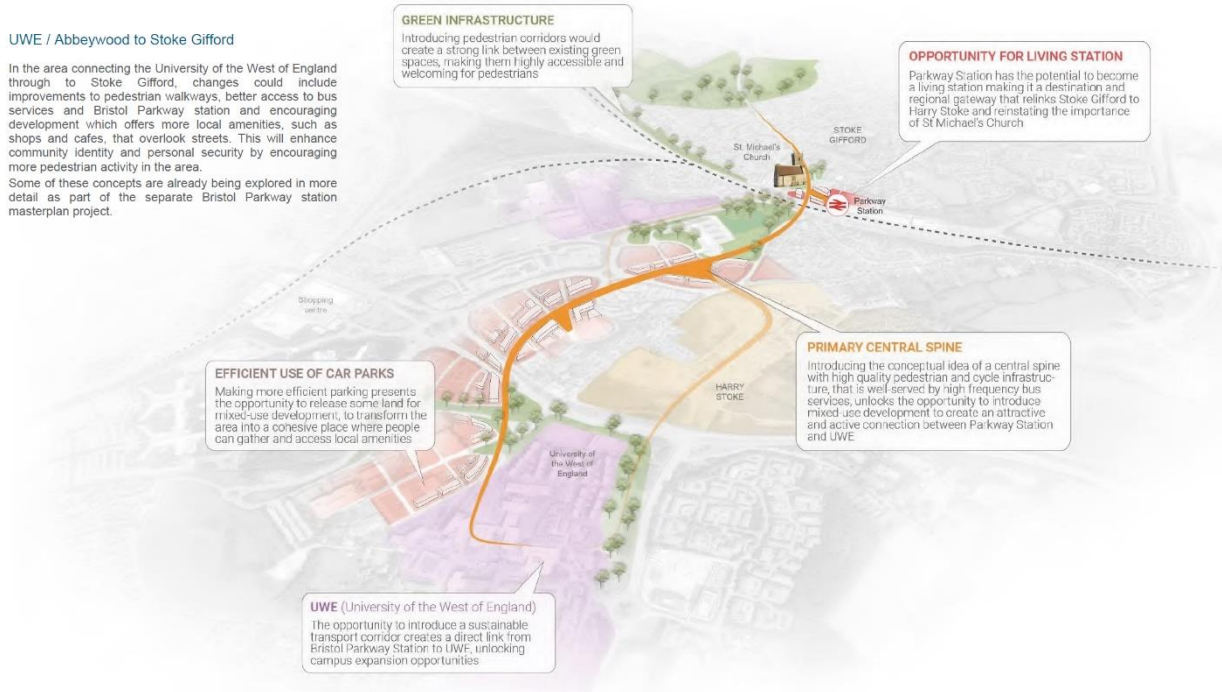
4.23 The North Fringe of Bristol Strategic Infrastructure Led Masterplan was published by the West of England Combined Authority (WECA) in August 2022. It sets out a long-term infrastructure strategy for the area over the next 30 years. The masterplan includes place-based examples and illustrative opportunities for change. The document acknowledges that while there may be opportunities for additional homes and employment in this area through the investment and change envisaged by the masterplan, there are no specific sites identified as suitable and deliverable housing allocations through the Local Plan process.

4.24 Within the North Fringe masterplan, the Lake View site is identified within one of the “illustrative opportunities for change”, with an indicative place-based example for UWE / Abbeywood to Stoke Gifford (see figure 4 below). This opportunity area is described as an area connecting UWE through to Stoke Gifford, with opportunities to improve pedestrian walkways, provide better access to bus services and Bristol Parkway railway station and encourage development which offers more local amenities, such as shops and cafes that overlook streets. This will enhance community identity and safety and encourage more pedestrian activity in the area.

4.25 Specifically in relation to our client's site at Lake View, the masterplan (Figure 4 below) identifies our client's site within the 'primary central spine' which is viewed as an opportunity to introduce high-quality pedestrian and cycle infrastructure, that is well-served by high-frequency bus services, unlocking the opportunity to introduce mixed-use development to create an attractive and active connection between Parkway Station and UWE. This aspiration is supported for the area and our client's site specifically, which presents a significant opportunity to contribute to the objective for mixed-use development at the site and improve pedestrian and cycle connections. In addition, the site presents the opportunity to contribute to SGC's housing supply in the next 10 years. It can, therefore, be included as an allocation for mixed-use development in this Local Plan. Our client is fully committed to continuing to engage positively with SGC to bring the site forward for development, allowing it to make a meaningful contribution to the housing and employment targets in the emerging Local Plan.

4.26 This will assist in boosting SGC's housing supply, making the draft Local Plan more robust and able to meet the NPPF soundness tests it will be assessed against at examination.

Figure 4: Illustrative opportunity for change for UWE / Abbeywood to Stoke Gifford, North fringe of Bristol Strategic Infrastructure-led Masterplan (2022)



Parkway Station and Surrounds Masterplan

- 4.27 The Council has worked with its partners Network Rail, Great Western Railway, and WECA on the Parkway Station and Surrounds masterplan, which was approved in December 2022 after public consultation. The masterplan provides a future vision for the redevelopment of the station and the surrounding area over the next 10 years and beyond. It reimagines Bristol Parkway as a new destination and fitting gateway for South Gloucestershire and the region, complete with a new station, places to work, meet and gather and new parks and habitats. SGC acknowledges that while there will be opportunities for additional homes and employment in this area through the investment and change envisaged through the masterplan, there are no specific sites identified as suitable and deliverable housing allocations through the Local Plan process.
- 4.28 The document identifies that the station provides a gateway to one of the most economically thriving areas in the country and to lively neighbourhoods to the north and east of Bristol, as well as the market towns of Yate, Chipping Sodbury, and Thornbury. The station represents the third-most heavily used station in the West of England, after Bristol Temple Meads and Bath Spa. As such, it is key to the economic prosperity of both South Gloucestershire and the wider region, which is consistently the most productive city in England and Wales outside London.
- 4.29 The masterplan identifies the opportunity to create new homes for people within walking distance of the train station. We fully support this aspiration and consider that our client's site at Lake View presents an opportunity to capitalise on its sustainable location next to the railway station, providing new homes and jobs, and to contribute to improvements to the station.
- 4.30 The aspiration is for Bristol Parkway to become a model of a 'Living Station'. The idea of a Living Station has been developed by Network Rail and Arup to define what stations could and should be, which is the hub for people's transport experience, connecting different modes and services seamlessly – where cycling and walking are easy and obvious choices. This principle is fully endorsed, and our proposals for Lake View seek to improve cycle and pedestrian connections to and from Parkway Station, capitalise on this transport hub, and build these principles into the vision.

Employment and Land Review (ELR) - January 2022

- 4.31 The Lake View site is within the North Fringe of Bristol Urban Area, defined as a dense employment and residential location on the outskirts of Bristol, incorporating the Filton Enterprise area, Ministry of Defence and University of the West of England. It is a strategic employment location for the West of England. It is an

established hub for aerospace and advanced engineering, with a strong focus on manufacturing, wholesale and retail trade, public administration, and professional, scientific and technical sectors.

- 4.32 The site is identified within the ELR as part of the 'north parkway employment area' and in the Local Plan as SG-10 Parkway Business Park safeguarded employment area. The site is a designated edge-of-centre employment area located in the North Fringe of Bristol and on the edge of the Filton Enterprise Area. The site is described by the ELR as follows:
- Bound by the Harry Stoke committed development site and City of Bristol College, in close proximity to the UWE Frenchay Campus and MOD Abbey Wood site.
 - The Business Park contains a range of office-based employment activities over four different land parcels, with accompanying leisure activities.
 - The employment area is safeguarded for economic development by Core Strategy Policy CS12. Should an application for storage and distribution be sought on the site, policy PSP27 would need to be satisfied.
- 4.33 Policy CS12 sets out a list of criteria against which proposals for non-employment uses in safeguarded areas will be assessed, including contributing to sustainable development and improving the range of jobs available in the area. Policy PSP27 sets out that proposals for storage and distribution up to 3,000 sq m will be acceptable in safeguarded economic development areas where it can be demonstrated that they would not conflict with neighbouring land uses and the maximum density is compatible with the site's location and surroundings. The Council's approach to considering flexibility in the type and nature of employment development within designated areas, including industrial, research and development, is encouraged. It should also include other forms of economic development.
- 4.34 The ELR identifies our client's site (referred to as 'The AXA Centre' in the document) as a "large purpose-built, high specification modern office in a landscaped environment with a strong parking provision, suited to modern occupiers". This information in the ELR is outdated, and we therefore seek to provide updated information within this representation to enable SGC to undertake a fair and valid assessment of the site's usage.
- 4.35 We can confirm that over half of the building is currently vacant due to the lack of demand for these large out-of-town office developments. The challenges the office building faces have already been considered in this representation. However, in summary, the out-of-town office market faces several challenges that impact its viability. These include limited accessibility, competition from urban centres, perceived isolation, infrastructure requirements, lack of amenities, regulatory constraints, market demand fluctuations, environmental concerns, economic uncertainty, and shifts in remote work trends.
- 4.36 Overcoming these challenges requires careful planning, strategic decision-making, and investment in infrastructure, amenities, and sustainable practices to attract businesses and ensure the long-term success of out-of-town office developments. Of particular relevance is that the site is close to Bristol Parkway Railway station and benefits from good rail and bus links and cycle paths, so the planning strategy and ELR need to reflect future opportunities and the objectives of the Local Plan. A clear policy framework should seek to respond to the environmental objectives of the SGC Local Plan, including 15-minute neighbourhoods and the national climate emergency. Mixed-use developments are an appropriate and sustainable use of this site, maximising the access to excellent infrastructure, services, and amenities in this location on the North Fringe of Bristol.
- 4.37 It is proposed that SGC work pro-actively with landowners of sites within areas identified for potential 'evolution and change', especially where they are identified within masterplan framework areas. This engagement should seek to define the future for these sites and build a positively prepared and justified strategy for the future.

Planning for new homes – how many and what type

- 4.38 The standard method approach identifies a minimum housing requirement of 20,490 new homes for SGC for the new Local Plan over the 15-year period. Deducting existing commitments from the standard method, this leaves a housing requirement of 10,387 new homes to be built in SGC 2025 – 2040, to be delivered as follows:
- Large sites (10 homes or more) with planning permission which will be built from April 2025. This would provide 7,687 new homes.
 - The current small site windfall figure of 210 new homes per year, over 15 years would provide 3,150 new homes. Small site windfalls mean sites of between 1 and 9 homes, which come through the planning system each year. This figure of 210 per year was set in the Core Strategy (2011), and SGC's evidence shows at least this number will continue to be built each year during the lifetime of their new Local Plan.
- 4.39 This leaves the new Local Plan target of at least 9,653 new homes which SGC need to find land for, as part of their new strategy for new homes. SGC's proposed preferred spatial strategy for delivery of these homes is as below:

Small site windfall uplift	300 new homes. Currently 210 new homes per year are counted as coming forward as small-scale windfalls (1 – 9 homes) and included as part of SGC’s ‘existing commitments’. SGC have reviewed the small sites evidence and consider this can be increased to 230 per year. Over 15 years this would result in an additional 300 new homes. SGC’s justification and evidence for this is set out in the Small Sites Windfall Topic Paper 2023.
Future urban allocations	<p>1,540 new homes, including allocations at Thornbury, Yate, Emersons Green, Warmley, UWE, Filton, Kingswood, and Hanham.</p> <p>In addition, two proposed site allocations are consulted on, and whether they should be retained in employment use, or be developed. The sites and development options proposed are:</p> <ul style="list-style-type: none"> • 350 homes and employment at Filton 20 Business Park, and • 58 dwellings at Bristol Uniforms in Mangotsfield. <p>Total: 408 homes</p>
New greenfield allocations	<p>7,813 new homes on greenfield land beyond the urban area and market towns, some of which are in the Green Belt. This includes:</p> <ul style="list-style-type: none"> • 5,990 homes delivered via new greenfield allocations (urban edge) including 410 homes in Almondsbury (Land South of Gloucester Road), and allocations in Lyde Green, Oldland Common, and Warmley, amongst others. • 75 homes delivered via new greenfield allocations in market towns, at Thornbury and Yate. • 7,820 new homes via new greenfield allocations in rural communities at Alveston, Charlfield, and Winterbourne, amongst others.

- 4.40 The Local Plan needs to ensure the delivery of homes through the plan period to meet this minimum requirement.
- 4.41 However, the identified allocations total 10,061 homes, which is only 408 homes above the minimum housing requirement of 9,653 homes, leaving very little contingency allowance to account for any of the identified sites stalling. There is also a reliance on unidentified windfall sites, which can often be complicated to deliver and regularly delays throughout the development management process. Given the current challenges in housing delivery rates, caused by planning delays in determining planning applications and planning conditions, and build costs and labour and material shortages experienced by developers/housebuilders, the Local Plan should anticipate that many of the sites identified could stall, and allow a sufficient contingency for this, of at least 10%, ideally 20%. To do this, SGC will need to identify further sustainable sites to deliver their housing requirement.
- 4.42 Our client’s site provides a key opportunity to contribute to this housing delivery in a growth area and highly sustainable location, SGC should seek to capitalise on this strong potential for delivery through allocation within the Local Plan.

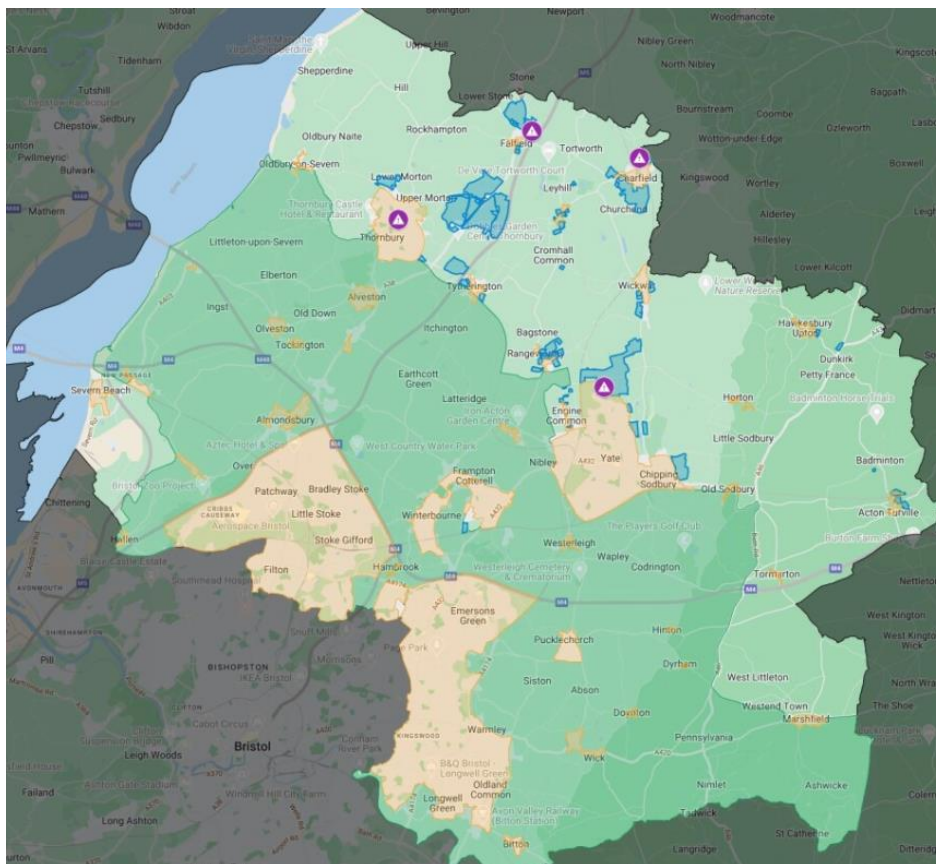
The Three Strategy Lenses

- 4.43 SGC has developed their emerging preferred strategy by exploring three different strategy ‘lenses’. Each lens looked at an alternative approach to locating new homes and jobs. The emerging preferred strategy is a combination of locations and sites identified through these lenses. Three lenses are considered / proposed are:
 - Lens 1: No Green Belt loss;
 - Lens 2: Urban Edge; and
 - Lens 3: Transport Corridors and Hubs.
- 4.44 Representations on these proposed lenses will help SGC to confirm a preferred strategy for the next stage of consultation, the draft plan Regulation 19 version.
- 4.45 Although the three strategy lenses considered in the Local Plan set out a good broad range of spatial options for SGC’s housing delivery, it is quite a complex approach. It may have been clearer for the Local Plan to set out SGC’s preferred strategy, with a robust justification and more detailed reference to the sustainability appraisal that sits behind it. Presenting a series of options, which differ greatly from each other, could lead to the preferred strategy being based on political views, rather than an informative and tangible evidence-based approach to spatial planning.
- 4.46 We provide our comments on the proposed lenses below.

Strategy Lens 1: No Green Belt loss

- 4.47 Over 40% of the SGC local authority area is covered by the Green Belt, separating Bristol and Bath and surrounding the Bristol North and East Fringe urban areas. Under the lens 1 approach, new homes and jobs would be allocated on sites that avoid any changes or loss of the designated Green Belt. Based on the sites that have passed SGC's initial assessment, this strategy lens would have delivered up to 8,353 new homes in the Plan period. However, through their evaluation, SGC has identified that this number would not be deliverable over the Plan period, with key issues being delivery of the necessary infrastructure in a timely manner, impacts on the role and function of existing places, as well as individual onsite constraints and off-site impacts.
- 4.48 SGC's table of sites with no Green Belt loss identifies sites through three approaches – new settlements, market towns, large potential sites in rural villages, and small potential sites in rural villages. The allocations in the table total 7,280 homes, which does not achieve the 8,353 identified for this lens approach. This option would provide the lowest number of homes of all of the three strategy lenses considered.
- 4.49 The approach would require allocating a range of sites around the three market towns of Thornbury, Yate, and Chipping Sodbury and maximising the growth possible at Charfield, building on the potential sustainability opportunity by the new rail station. The map below shows where sites would need to be progressed if the preferred strategy avoided any Green Belt loss.

Figure 5: Strategy Lens 1 – No Green Belt Loss



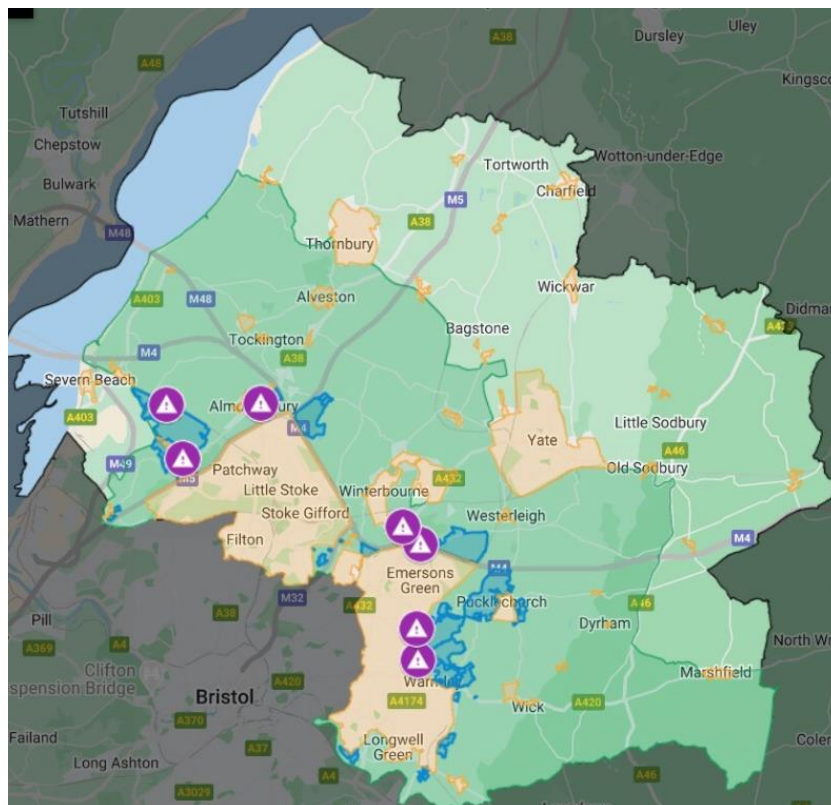
- 4.50 Given the issues surrounding the deliverability of the housing requirement, the 'no Green Belt loss' solution is not supported and does not meet the principles of sustainable development or tests of soundness outlined within the NPPF.
- 4.51 Reviewing the non-Green Belt growth areas identified on the map above reveals that they are less sustainable than the settlements within the Green Belt immediately adjacent to the fringes of Bristol. The Bristol fringe offers a pivotal opportunity to deliver sustainable development close to Bristol, benefiting from good infrastructure, services, and amenities, unlike the more rural areas, further isolated from key settlements.
- 4.52 SGC acknowledge that all their required homes under this approach are inherently unsustainable as they will promote and encourage longer car-based commuter travel unless reliable, attractive and competitive public transport services can be secured and delivered. Securing a dependable and frequent public transport alternative

is particularly challenging for this lens due to the long distances covered in reaching centres, such as Bristol, and the spread of rural villages. There are better strategies for the delivery of new homes than this approach.

Strategy Lens 2: Urban Edge

- 4.53 This lens proposes to focus new jobs and homes on places surrounding the main urban areas, namely Bristol's north and east fringes, and the Severnside employment area. The benefit of this approach is that it focuses new development next to existing infrastructure, enabling the delivery of sustainable development. SGC assert that this approach would deliver 12,750 new homes but concludes that ultimately, this approach is not deliverable over the plan period due to the delivery of infrastructure in a timely manner, impacts on the role and function of existing places, as well as individual on-site constraints and off-site impacts. Potentially suitable sites through this approach are shown on the map below.

Figure 6: Strategy Lens 2 – Urban Edge



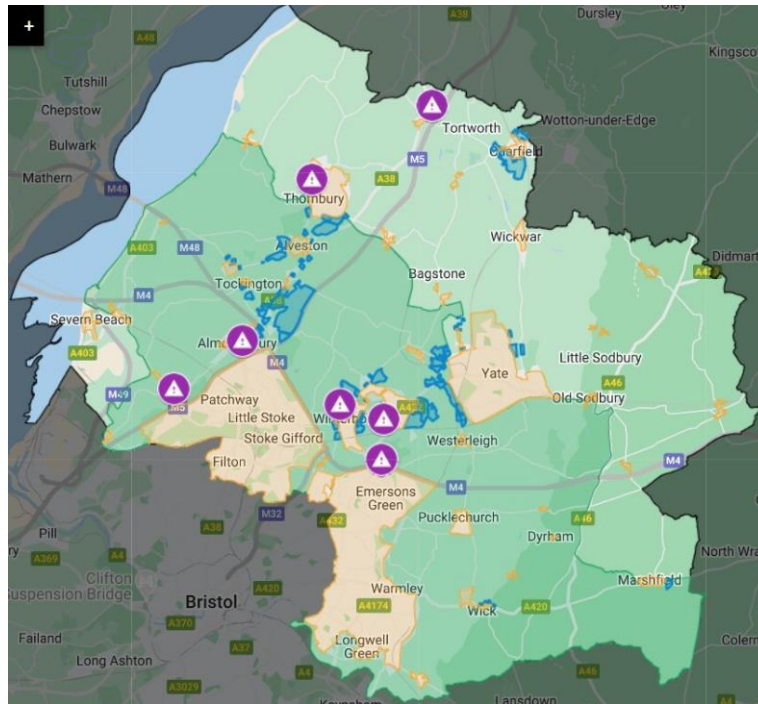
- 4.54 As shown on the map above, this approach identifies new development through new settlements, large urban extensions, small urban extensions, large potential sites in rural villages, and small potential sites in rural villages on the fringes of Bristol.
- 4.55 As part of lens 2, large extensions are identified on the north fringe and at Severnside. SGC acknowledge that by focusing on new homes and jobs in proximity to the urban edge, this lens created strong potential to encourage more sustainable travel habits by reducing the potential need for longer distance travel and commuting across the Green Belt to access jobs and services. It is unlikely that everyone would work in the Bristol urban area at the three main centres of employment in the city centre, Avonmouth/Severnside and the North Fringe area of South Gloucestershire; however, these are still the main employment areas for the region and a significant number of people in South Gloucestershire already commute to them to access jobs. Therefore, it is assumed that this would continue to be the case.
- 4.56 Allocations in the north fringe and Severnside include potential sites at Woodlands (L2-FC2) north of Easter Compton (L2-PSB9), with some smaller potential sites adjacent to these. These places support the decarbonisation of travel across the district by locating homes close to the existing areas of employment, reducing the distance new residents will likely need to travel to jobs. Sites adjacent to the Bristol North Fringe and around Severnside would need to provide new and enhanced public transport, walking, and cycling routes to realise opportunities for sustainable and active travel between the existing employment area at Severnside and North Fringe.

- 4.57 Currently, there are no large-scale infrastructure connections or services from the proposed sites in this area. Below are the opportunities SGC identified when they explored this lens:
- The delivery of homes and jobs in proximity to the Bristol North Fringe and Severnside employment area, including affordable housing close to main service centres and employment, which would reduce the need for long travel journeys and decarbonise travel.
 - Potential to better connect the Bristol North Fringe with Severnside with potential site locations in Easter Compton and north of Easter Compton (L2- PSB9), which could relieve pressure on the local network.
 - The delivery of homes near the Severnside employment area would redress the current imbalance and potentially reduce the need to travel long distances across the district by allowing people to co-locate where they work.
 - The delivery of homes and jobs here could also support the delivery of a sustainable, high quality and viable public transport offer and active travel routes that could better connect the Bristol North Fringe and Severnside.
- 4.58 In terms of any challenges with this lens, SGC identify several key infrastructure challenges, including the need for new public transport and active travel infrastructure to better connect Severnside to potential sites at Swanmoor Stoke and into the North Fringe, and the requirement for new health, primary, secondary and playing pitch provision at these locations.
- 4.59 SGC dismisses this lens strategy because of a large proportion of planned needs in the Green Belt and insufficient infrastructure. However, new infrastructure can be delivered only by allocating new development sites, as new development will provide infrastructure improvements through Section 106 contributions. New development and Section 106 contributions are key mechanisms to fund and unlock new infrastructure provisions. A more ambitious approach, which seeks to unlock development opportunities in locations on the urban edge, would enable the Local Plan to plan for and deliver sustainable development and the significant number of homes required in the SGC over the Plan period. This would demonstrate to the Local Plan Inspector that the plan has been positively prepared and is effective, in line with the tests of soundness of the NPPF.
- 4.60 This lens clearly restricts growth at some of the main settlements within South Gloucestershire which would be at detriment to their planning and sustainable growth. The approach would create disparity and a divide in investment and more rural communities would become marginalised and their access to affordable homes would be significantly reduced.
- 4.61 Whilst our client's site in the north fringe, sustainably located and a brownfield site and presents a key opportunity for sustainable development in the north fringe, there will be a requirement for a more dispersed approach to development which caters for the needs of towns and villages.

Strategy lens 3: Transport corridors and hubs

- 4.62 This lens considers how a spatial strategy would perform if the majority of new homes needed were provided along already established key public transport routes and hubs. It assumes the strengthening of the MetroBus routes. This approach can deliver up to 11,890 homes. Below is a map showing where sites would have been explored if the preferred strategy were focussed on transport corridors and hubs.

Figure 7: Strategy Lens 3 – Transport Corridors and Hubs



- 4.63 As shown on the map above, potential site allocations to deliver this approach are identified at market towns, large potential sites on transport corridors/train stations, large potential sites on transport corridors and smaller potential sites on transport corridors.
- 4.64 SGC identified that this lens would present several challenges to align with SGC’s key objectives for delivering homes and jobs sustainably, primarily around overwhelming some settlements and pressure on infrastructure. Whilst delivering a spatial strategy strictly in accordance with this lens would result in potential conflict with the overarching objectives of the Local Plan, SGC should consider the most sustainable sites surrounding existing transport hubs and encourage greater levels of density in these locations. The masterplan for the parkway station and the wider area demonstrates that this location can accommodate a strategic scale of development and meet many of the Local Plan objectives.

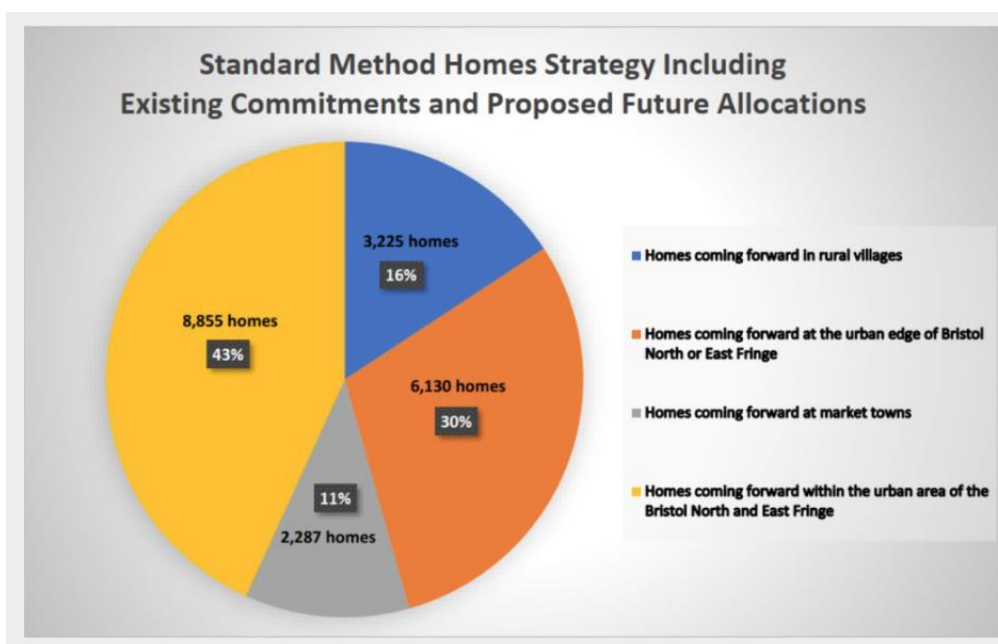
Preferred Strategy

- 4.65 The emerging preferred strategy for SGC seeks to locate development where it can contribute to reducing the impacts of and on climate change and is driven by the six Local Plan objectives identified in the previous section of this report. It focuses on directing a significant element of the new development close to the urban edge of greater Bristol, utilising suitable sites in greater proximity to existing jobs, public transport routes, capitalising upon existing facilities and infrastructure. Key principles of the preferred strategy are:
- Green Belt release required – SGC acknowledge that they do not think an appropriate strategy can be formed by meeting their needs for new homes and jobs on sites beyond the Green Belt. They have explored and shown through Lens 1, what avoiding any loss of Green Belt would look like and found it would likely cause overloading of villages, settlements and locations with poor infrastructure, and significant growth in places with relatively poor services, facilities and opportunities for sustainable travel. Where potential allocation sites in the emerging preferred strategy are located in the Green Belt this will result in changes to the overall extent of Green Belt in South Gloucestershire. Work is currently underway to understand the contribution of the potential sites to the five purposes of the Green Belt and how harmful their removal might be. The Council and promoter will need to work closely to understand how a new strong defensible boundary can be achieved that will endure beyond the plan period. Site promoters will also need to consider and plan for the remaining Green Belt land to be improved and enhanced to provide high quality open spaces and support green infrastructure and nature recovery objectives.
 - Future transport considerations – locating new homes and jobs in locations on existing public transport routes and avoid reliance on car-based travel.

- A key factor which has influenced the choices SGC has made is that sites that require supporting infrastructure will need to demonstrate they can deliver this over the 15-year Local Plan period that ends in 2040, with evidence that there is the appropriate funding and mechanisms in place.
- In considering jobs and homes in smaller communities, new homes and jobs will need to be proportionate to the available level of services and facilities and public transport. A key driver is predicted number of primary education places.

4.66 The chart below shows the distribution of where the emerging preferred strategy would deliver the full standard method of 20,490 new homes across the district over the Plan period. This includes commitments previously allocated or speculative development given planning permission, small site windfalls and proposed new urban and green field site allocations. The largest provision will be through the delivery of 8,855 new homes coming forward within the urban area of Bristol North and the East Fringe.

Figure 8: Distribution of Housing under The Preferred Strategy



- 4.67 The emerging preferred strategy includes the delivery of new homes and jobs from existing committed developments, small site windfalls, and new allocations within the urban boundaries or the north and east fringes of Bristol as well as within the market towns of Yate and Thornbury, as well as greenfield allocations. It is supported by a mix of the strategy lens assessed and allows for the growth of both urban and rural settlements.
- 4.68 Whilst the spatial strategy is broadly supported, it is considered that there is an even greater opportunity to allocate further sites for development on the fringes of Bristol at sustainable sites, such as our client’s site at Lake View. This would put SGC in a stronger position to deliver their housing requirements and the objectives of their emerging Local Plan. More detail and a supportive policy framework around the work undertaken to masterplan specific areas would enhance the possibility and ensure deliverability of development in these areas. Paragraph 74 of the NPPF identifies that creating masterplans and setting clear expectations from these can ensure that a variety of well-designed and beautiful homes to meet the needs of different groups in the community are delivered.
- 4.69 In addition, SGC will be required to form a housing trajectory to determine how many homes will be delivered in the plan each year. To provide clarity for future decision-makers, it is critical that the housing requirement is set out unambiguously in the plan’s policies. This is especially important when the plan sets a stepped requirement because it will be assumed that an annual average requirement figure will apply unless there is a policy statement to the contrary. The plan’s strategic policies should set out both the overall housing requirement for the plan period as a whole and the requirement(s) that apply in each year of the plan period. Understanding clear deliverability objectives from masterplanned areas and sites within these will allow the SGC to better define their trajectory throughout the plan period.

Meeting Adjoining Authorities Unmet Need

- 4.70 SGC states that at the time of consulting on the plan, although they are aware that Bristol City Council will not be able to meet all their housing needs within their authority boundary, at this stage, SGC have not considered the

extent to which South Gloucestershire Council may or may not be able to take any part of this unmet need. They further state that the Duty to Cooperate (DtC) is a duty to cooperate and not a “duty to agree”.

- 4.71 This is a short-sighted approach from SGC and will lead to a situation whereby the housing requirement proposed by SGC in the Regulation 18 Local Plan is already too low, and SGC will need to find further sites and amend their spatial strategy in future versions of the Local Plan. This runs the risk of the Local Plan being found unsound by the Inspector at Local Plan examination. The failure of the SGC Local Plan to look cross-boundary at Bristol’s unmet need is in clear conflict with the NPPF. This has ultimately led to a draft Local Plan which is not ‘effective’ – as it is not based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground, or consistent with national policy enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, on the duty to cooperate.
- 4.72 Therefore, in its current form, the Local Plan unequivocally fails the tests of soundness of Paragraph 35 of the NPPF.

Policy Framework and Draft Policies

- 4.73 The focus of the new policies is prioritising updating those that align with the objectives of the Local Plan and addressing the housing crisis. SGC aim to set out the overall policy framework for the new Local Plan in the Publication draft (Regulation 19) in May 2024. This will contain policies covering the following:
- a final strategy for homes, jobs, infrastructures, confirming the locations and sites that form the preferred strategy;
 - further information on safeguarding land for transport and infrastructure; and
 - a full set of draft policies that will bring together policy drafts from Phase 1, Phase 2, and Phase 3, along with strategy and spatial policies.
- 4.74 It will also confirm which policies in the Core Strategy (CS) and Policies, Sites and Places Plan (PSP) will be saved for the time being until replaced by national development management policies or future development plan document, which will be prepared following adoption of the new Local Plan.
- 4.75 During consultation SGC is proposing new and updated draft Local Plan policies covering:
- Climate Change Mitigation, Adaptation and Resilience
 - Energy Management in New Development
 - Embodied Carbon
 - Renewable and Low Carbon Energy Systems
 - Community Energy
 - Affordable Homes
 - Sites for Gypsies and Travellers
 - Sites for Travelling Showpeople
 - Internal Space and Accessibility Standards
 - Mineral Working and Restoration
 - Economy and Jobs
 - Town Centres
 - Strategic and Major Sites Delivery Policy
 - Stewardship Arrangements
- 4.76 Comments are only made in regard to specific policies identified below. M&G reserve the right to comment further in later consultation processes regarding policies that impact the deliverability of any future development regarding their landownership.

Safeguarded employment sites

- 4.77 The existing SGC Local Plan, the Core Strategy, includes 58 safeguarded employment sites. The emerging Local Plan proposes the release of 7 of these sites. Of these, one is on the north fringe (Filton Northfield), three on the

east fringe (Emersons Green, Douglas Road, and the former Kleeneze site), one in Thornbury (the former council offices), and two in Yate (Coopers site, and Minelco site). All these sites are released for residential development. The release of these sites, most of which are on the Bristol urban fringe, indicate that a strong case can be made for the release of our client's site at Lake View for residential development, and that this is an appropriate location for more efficient and effective mixed-use development. With the decline in interest for out-of-town office space on the Bristol fringe, coupled with the Bristol urban fringe being a sustainable location for new residential development, this is an appropriate location for residential or mixed-use development.

- 4.78 As mentioned in the previous section, in the emerging Local Plan, SGC are consulting on options for two safeguarded employment areas; Land at Filton 20 Business Park (Filton), and Bristol Uniforms Site (Staple Hill), as urban option sites. They are also consulting on 2 safeguarded employment areas; Lucas Works (Kingswood) and part of University of West of England, as proposed site allocations.
- 4.79 A new policy covering safeguarded employment sites is included in the draft Local Plan which will replace policies CS11, CS12 and CS13 of the adopted Core Strategy. The draft policy sets out that proposals for change to other economic development uses will be permitted where it can be clearly demonstrated, through adequate marketing and other relevant evidence, that individually and/or cumulatively with other completed and permitted developments:
- a) the proposal would not prejudice the regeneration and retention of priority employment uses elsewhere within the defined employment area; and
 - b) that it would contribute to a more sustainable pattern of development in the local area due to appropriateness of the proposed economic development use to the location; and
 - c) the proposal would improve the site's economic output through the number or range of jobs available in the local area, or through another appropriate economic indicator; and
 - d) no suitable alternative provision for the proposal has been made elsewhere in the Local Plan.
- 4.80 Other than very minor additions, the proposed wording for the policy remains largely the same as of the adopted Core Strategy Policy CS12, in relation to safeguarded employment sites. The supporting text of the draft policy sets out that opportunities to redevelop existing employment sites, through intensification or re-modelling, will be encouraged. It goes on to state that redevelopment can increase productivity through the more efficient use of land and enable the site to make a better contribution to the local area through better design and improving the number and range of jobs available. This is supported and our client's site at Lake View is an obvious location for intensification of an existing employment site, through mixed-use sustainable development. The Policy should ensure that it is not overtly protective of the scale of development or alternative uses coming forward in these locations where there is robust and justified evidence.
- 4.81 The proposed employment policy sets out that proposals comprising 10 or more residential dwellings, 1,000 square metres of new non-residential floorspace, or loss of 1,000 square metres economic development floorspace, will be expected to facilitate access for local residents to employment and training. This should include, but not be limited to, supporting employment initiatives, skills development, and sustainable travel measures within the completed development itself and through the construction/ supply chain. The policy should include an allowance for this to be subject to viability testing, as this provision may not be feasible or appropriate for all development sites where mixed-uses or residential uses are being explored.
- 4.82 Aside from this policy, the Plan needs to do more to recognise the links between housing and employment and the impacts that failing to properly plan for housing will have on the economic performance and competitiveness of South Gloucestershire Region. Housing growth and delivery is needed for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing and supporting employment growth. Therefore, there is a need to more fully consider future housing in conjunction with the Plan's strategy for employment. Within the plan there is a need for a clearer link and explanation between the spatial strategy, housing and employment allocations and the topic specific policies later in the Plan. Such matters need to be considered on an area-by-area basis that fully recognises the links between housing policy and employment policy.
- 4.83 Employment allocations and opportunities within a particular housing market area could give rise to an additional housing need that should be accommodated within that area. The failure to provide new housing close to where people work results in longer commuting times, less sustainable patterns of development and harms the economic performance of an area. Otherwise the Plan is not consistent with national policy, is not positively prepared, not effective and not justified, and as such it is unsound.

Self-build

- 4.84 In order to meet their annual plot duty, SGC already have an adopted self-build planning policy (PSP42 Self-Build and Custom Housebuilding). This requires all developments of 100 dwellings or more to provide 5% of those

dwellings as serviced plots for self and custom build homes. It also requires plots to accommodate dwellings of approximately 108sqm (gross internal floor space) equivalent to a 6-person 3 storey 3 bed or 6-person 2 storey 4 bed dwelling as prescribed in the Nationally Described Space Standards (NDSS). Careful consideration needs to be given of any impact of this policy requirement on the delivery of housing, and a mechanism must be built into the policy to enable the release of the 5% self build provision to open market C3 development, if there is no interest in the self-build element of the development.

Energy Policies

- 4.85 With regards to the draft sustainability and energy policies (Climate Change Mitigation, Adaptation and Resilience; Energy Management in New Development; Embodied Carbon Renewable and Low Carbon Energy; and Community Energy), these include very specific requirements and specifications which developments must adhere to. We fully support SGC's intention to ensure that Local Plan policies require new development to be in line with sustainable development principles. However, we consider that the wording needs to be reconsidered and is far too prescriptive in its current form. As currently written, the regulations and specification contained within the policy wording duplicate policies already contained in national building regulations guidelines. This is something local plans are strongly directed to avoid by the Government, as this creates an unnecessary additional layer of policy, which can also quickly become out of date when national building regulations are updated. The national Future Homes Standard and Future Buildings Standard sets the national policy framework for sustainability and provides the planning policy mechanism for this and does not need to be duplicated by local planning policy.
- 4.86 As currently worded, these four sustainability policies proposed by the Local Plan are not necessary, effective or deliverable over the Plan period and are therefore fail the tests of soundness. A more effective approach would be for the climate change and energy Local Plan policies to direct the reader to national building regulations, and the Future Homes Standard and Future Buildings Standard, or equivalent.

Embodied Carbon

- 4.87 Policies proposed regarding embodied carbon should be led by national guidance and the carbon reduction methods set out in Part L of the Building Regulations. Caution is raised against policies that seek to go further than national legislation and policy changes, which would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing.
- 4.88 If the Council is to introduce a policy in relation to embodied carbon it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how the policy will interact with other policies for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development. If this policy were to be introduced then the Council should provide a transitional period to give the industry time to adjust to the requirements and for the supply chain to be updated or amended as required.

Affordable Housing

- 4.89 The policy will require all eligible residential development including self-build and self-contained older people's housing and student housing to make provision for 35% affordable homes. On greenfield sites with limited infrastructure and viability issues a higher percentage of 40% affordable homes will be required by the new policy. It is essential that this policy approach allows for each application to be subject to a viability assessment, to ensure that development is not unnecessarily fettered by affordable housing requirements, making delivery of new homes unviable, and impacting on SGC's ability to meet their housing and affordable housing need.
- 4.90 The proposed policy position is 6,709 affordable homes across the plan period, or 447 homes per year. All new housing development of 10 or more homes (5 dwellings in designated rural areas) or 0.5 hectares in size are required to achieve without public subsidy a minimum of 35% on site affordable housing. Relevant greenfield sites with no significant infrastructure requirements or viability constraints are required to achieve 40% onsite affordable housing.
- 4.91 It is considered that the requirement for affordable housing to be without public subsidy to be unnecessarily onerous and could fetter the provision of affordable housing in SGC, which is in conflict with the objective of the draft Local Plan to enable the delivery of affordable housing. To deliver the affordable housing required, both public subsidy and equity are required. Registered providers are under increasing financial pressures, with significant money required to invest in fire safety repairs and the next zero transition, as well as build costs, that affordable housing provision should not fall solely to them. Affordable housing delivery cannot be met through existing sources of funding alone and SGC should consider alternative funding models, including providing its

own, or allowing other forms of, subsidies. There is ever increasing funding gap emerging as financial pressures mount on the affordable housing sector. If this policy is not revised to enable public subsidy, it fails to have been positively prepared or effective, and therefore fails the NPPF tests of soundness.

- 4.92 Developers of Build to Rent housing will be required to provide on-site Affordable Private Rented homes without public subsidy with rents (including service charges) set at up to 80% of the market rent for an equivalent property, but not exceeding the relevant Local Housing Allowance (including rent increases). The council and the developer can agree to meet this requirement by other routes, preferably by providing other forms of Affordable Housing as defined in NPPF and/or a financial contribution. SGC need to carefully consider the impact of this policy on BtR delivery, and need to undertake detailed viability testing of this approach. This is particularly important as BtR is a key mechanism for responding to the housing crisis in the UK.

Internal Space and Accessibility

- 4.93 The draft internal space and accessibility policy should state a requirement M4(2) or M4(3), 'or equivalent', to take account of any potential changes to the national building control regulations.
- 4.94 In relation to the requirements for all new development to meet M4(2), the requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. There is therefore no need for this element of the proposed new policy.

Appendix 1 – Illustrative Site Masterplan



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