



Campaign to Protect
Rural England
AVONSIDE

Spatial Planning Team
South Gloucestershire Council
PO Box 2081
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30 July 2010

Dear Mr Conroy,

Response to Core Strategy Pre-Submission Publication Draft

South Gloucestershire CPRE District Committee broadly supports the Council's strategy for development. We note the fact that the Council has reverted to the development figure of 21,500 homes for the period 2006-2026. We were totally opposed to the former Secretary of State's proposals for 32,800 homes which would have resulted in the loss of large areas of Green Belt land through the development of urban extensions. However, we now ask the Council to give consideration to further reducing the development figure now that it is no longer being forced by the Government to build so many dwellings and is able to focus on robust evidence of local need for housing as an indicator of levels of provision required. We would also point to the new emphasis on "localism" which allows for additional weight to be given to well grounded local preferences for land use. The level of opposition to current applications for developments on greenfield and Green Belt land indicates the strength of feeling of local communities about the importance of such locations. We certainly oppose any large scale housing developments on Green Belt land because they do not constitute "exceptional circumstances" as required by PPS2.

Where development is allowed on greenfield land and the intention is to retain hedges it is vital that a hedgerow management system is put in place and we would expect to see this made explicit in any development management SPDs.

We are also concerned about whether some of the Bristol urban fringe proposals can realistically deliver the level of sustainability required by PPS1 for example. We would wish to see firm evidence of a requirement that satisfactory infrastructure is in place before new dwellings are occupied. It is also quite unrealistic to expect that low parking standards or further provision of cycle paths and footpaths, however desirable, will make a significant impact on additional levels of traffic in areas which are already subject to significant congestion. This problem must be addressed before any development is commenced.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources on town and country.

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While we applaud efforts to create green infrastructure connections we are concerned about the apparent tendency to treat the motorways in the north Bristol area as borders for urban development. Apart from obvious noise and pollution problems for nearby residents and the loss to many people of easy access to a countryside environment without having to cross a motorway, the removal of large areas of greenfield land located inside the motorway network would have an overall impact on biodiversity, air quality and the future potential of such land to deliver local food produce. The Core Strategy must consider the “value” of natural green land in more than economic terms, partly for its intrinsic value but also for its contribution to quality of life and for its future mitigating effects on the impacts of climate change and peak oil.

We would make the following comments about specific sites in the Area Based Policies of the Core Strategy:

Policy CS26 Cribbs/Patchway New Neighbourhood

We do not consider that this area is entirely suitable for such large scale development, particularly in the southern section, due its proximity to the airfield, the level of traffic which would be generated (in addition to the considerable impact of the proposed new National Wildlife Conservation Park) and the loss of greenfield land. While we are in agreement that there is considerable scope for reprofiling and further developing the area around the Mall and north of the airfield for mixed use development, we consider the area to the south of the runway to be far less suitable. There is no direct strategic link to the northern section of this “neighbourhood” or to the Charlton Hayes area because of the intervening runway, so that geographically and strategically it is closer to Brentry in North Bristol. There is already a high level of traffic congestion towards Bristol in the rush hour at the proposed access point to Wyck Beck Rd. We are also concerned about loss of biodiversity and the threat to species rich hedgerows and meadow land.

We note that Bristol City Council is currently consulting on proposals for a substantial level of housing on green space sites in Henbury, Brentry and the fringes of Southmead and this could affect the proposed green infrastructure connections in the area.

We would propose that the area south of the runway should only be brought forward for development as a final contingency after the northern area has been fully developed and only if there is an evidenced need for further housing in this area.

Policy CS27 East of Harry Stoke Neighbourhood

We are concerned about the loss of Green Belt between Harry Stoke and the M32 motorway for the development of 2,000 homes and the Stoke Gifford Transport Link. With the reduced housing numbers we consider that an alternative site could be found that is not Green Belt.

This particular site has landscape value and is currently agricultural land. The pylons across the site make much of it unsuitable for housing. The A4174 Avon Ring Road is already heavily congested in this area at peak times and we question whether there is capacity for additional traffic.

Yate and Chipping Sodbury

We are grateful that there is no longer any reference in the Core Strategy to development between Chipping Sodbury and Old Sodbury.

Policy CS31 North Yate New Neighbourhood

We accept the preferred option of a north Yate new neighbourhood but consider that a development of 3000 houses is far too many. The existing infrastructure in Yate, in particular the roads in and out of the town, could not take this scale of development. The development will also result in a loss of access to the countryside.

We consider it is essential that the landscape setting and special separate identity of Yate Rocks is protected. We also continue to support an extension of the Green Belt north of Yate so that the town cannot continue to sprawl once any proposed new development is completed.

Policy CS32 Thornbury

We accept the argument that Thornbury would benefit from some additional housing in order to revitalise the town.

Finally, we would refer you the CPRE document '*Housing the Future*', Dec 2009, on the fallibility of using projections for housing numbers. The report reminds us that household projections are based on the shaky assumption that past trends will continue. It explains that the projections should not be used for house building because they ignore wider considerations, cannot take account of changing economic conditions and become self-fulfilling. Rather, it proposes that they should inform an objectives-led approach to planning for housing which is able to respond to changing circumstances, including evidence of environmental impact – in other words a 'plan, monitor and manage' approach.

Yours sincerely,



Marilyn Palmer
Chairman, South Gloucestershire CPRE District Committee