
Bath and North East Somerset Council
Local Plan (Core Strategy and
Placemaking Plan) Partial Update

Examination Hearing Sessions
Matter 4
Hearing Day 2, 22 June 2022

Written Statement On behalf of Crest
Nicholson Ltd in relation to Hicks Gate

6 June 2022

John Baker, Origin3 Ltd

ORIGIN3

Planning . Design . Development

Matter 4: Area Policies and Allocations

Issue: Are the proposed policies and allocations justified, effective and consistent with national policy?

- M4.1 For this written statement we have limited our comments to the general question set out as the headline issue of Matter 4 by the Inspector.
- M4.2 By reference to specific requirements from the Framework all already cited in addressing questions 1, 2, 3, 4, 5, 9, 12,13, 14 and 15, the LPPU Plan period is inadequate, the level of provision is insufficient, cross boundary issues and shared strategic issues are not addressed, the spatial strategy for the district is unchanged and not appropriate, and the Plan is not designed to promote sustainable development as well as it might and spatial plan-making provides for and requires. It follows that the proposed policies and allocations are not justified, effective and consistent with national policy.
- M4.3 The circumstances under which the Council has prepared, submitted and sought to justify the LPPU have now completely changed during the examination as it is now known that the WECA SDS cannot be expected to appear within any predictable timeframe, and quite probably not at all.
- M4.4 A full review of the Core Strategy is now needed and for BANES to have a local plan positively prepared, legally compliant and sound according to all of the tests set out and explained at paragraph 35 of the Framework. The resulting Plan would have to have an appropriate spatial strategy, and a mix of sites to implement the spatial strategy that varied in type and size to ensure a flow of deliverable housing throughout the Plan period.
- M4.5 An appropriate spatial strategy would provide for a significant amount of development within the district on the immediate periphery of Bristol, providing for housing need that could not be accommodated satisfactorily within the administrative Bristol to be located close to where the need was arising, with good accessibility to the services and facilities of the main urban centre in the West of England and the south west, and facilitating the provision, enhancement and use of high quality public transport services. The spatial strategy would provide for this develop notwithstanding the

inhibiting effect of the historic green belt designation, because the overriding statutory objective of plan making is to promote sustainable development (S38 of the Planning and Compulsory Purchase Act 2004).

- M4.6 With a spatial strategy meeting this objective in place, one of the strategic sites to implement the spatial strategy and chosen following the proper application of the influence of an objectively undertaken sustainability appraisal of the reasonable alternatives, would utilise the land controlled by Crest Nicholson at Hicks Gate. This land comprising 25ha straddles the boundary between Bristol City and BANES. It lies to the north of A4 Bath Road, and is bounded to the east by A4174 Bristol Ring Road and to the north by the Bristol-Bath railway line and the River Avon. A new easily recognisable green belt boundary could be readily identified.
- M4.7 The LPPU has not acknowledged as reasonable alternatives either a better spatial strategy than in the adopted but overdue-for-review Core Strategy, nor is making development provision on the edge of the Bristol urban area.