

# Bristol Local Plan Examination

Matter 4: Development Strategy and Site Selection  
Process

Written Statement prepared by Savills on behalf of St  
John Ambulance  
(Participant ID 401)

## Introduction

1. St John Ambulance (SJA) submits this Statement in relation to the following Issue identified under Matter 4 of the Inspector's Draft Matters, Issues and Questions:

**Issue 4.6: Whether the proposed site allocations are justified taking into account the reasonable alternatives, effective in terms of deliverability and consistent with national policy in enabling sustainable development?**

2. SJA engaged in the last round of consultation on the draft Local Plan, including making a Call for Sites submission for their site at the Harry Crook Centre, Raleigh Road, Bedminster, Bristol (herein referred to as 'the site').
3. A copy of the representations submitted during the most recent Regulation 19 ('Reg 19') consultation can be found at the following link as respondent number 401:  
[https://files.smartsurvey.io/3/1/O0YVB32S/236782150\\_20966066\\_3294087.pdf](https://files.smartsurvey.io/3/1/O0YVB32S/236782150_20966066_3294087.pdf)
4. As requested within IN4 Appendix 2, we have not repeated our Reg 19 concerns which remain outstanding but have referred to them where we feel this is helpful. This response should therefore be read in conjunction with these Reg 19 comments.
5. Since the Reg 19 consultations in November 2022 and November 2023, planning permission (ref: 23/03791/F) has been granted for redevelopment of the adjacent site, the former Amerind Grove Nursing Home, Raleigh Road, to deliver 106 new homes. This demonstrates the area will be going through redevelopment, and it is considered our site provides a further opportunity to deliver more housing.
6. Link to the planning application below - <https://pa.bristol.gov.uk/online-applications/caseDetails.do?keyVal=S1R6HJDNHTI00&caseType=Application>



**Q4.27: Are the proposed allocations identified by policies DS11, DS12, E4 and DA1 justified as appropriate when considered against reasonable alternatives and would they be consistent with national policy?**

7. This Statement responds to the following questions set out under the above Issue 4.6:
- Q4.27 a); and
  - Q4.27e) – I)
8. The documents we have referenced below include the Strategic Housing Land Availability Assessment (SHLAA), dated April 2024 (EVEH01) and the Housing Need and Supply Topic Paper (April 2024) (TPC004). Both of these documents were prepared just before the submission of the Plan, with the documents produced on April 2024, and the plan submitted in late April. This is despite the documents being the Council’s primary source of evidence for the housing supply matter.
9. In summary, having reviewed all the Council’s evidence base, it is evident they have not considered all reasonable alternatives when identifying the proposed allocations, and therefore their strategy approach to allocation of sites is not justified or robust.

a) Does the evidence demonstrate that the sites have been selected based on a robust, consistent and objective basis? What criteria were used to identify suitable sites and are the reasons for selecting some sites and rejecting others clearly set out and justified?

10. The Council’s evidence fails to demonstrate that the sites have been selected based on a robust, consistent or objective basis. There is no clear methodology for the identification and assessment of sites.
11. The reasons for rejecting the sites submitted through the Call for Sites process, including the SJA site, are not justified or clearly set out. To avoid repetition, please refer to SJA’s response to Q2.3a within the Written Statement responding to Matter 2.

Flooding and drainage issues

e) Has the selection of sites, and the spatial strategy, been informed by a Strategic Flood Risk Assessment based on up-to-date flood risk data and climate change allowances, taking advice from the Environment Agency?

- f) Has a sequential risk-based approach been taken to identifying the spatial strategy and specific allocations, as required by paragraph 161 of the NPPF? Are any locations identified for growth within Flood Zones 2 and 3? If so, has the exception test been carried out and are the conclusions justified?
- g) Notwithstanding specific questions relating to Policy FR2, to what extent is the spatial strategy and delivery of housing and employment dependent on the delivery of the Bristol Avon Flood Strategy? What status does this project have and what is the deliver timescales?

12. As part of its evidence base, the Council has prepared a Strategic Flood Assessment at EVEF01 and EVEF02. It has also produced a 'Flood Risk Topic Paper' (TPC002) in which the Council refers to sequential testing.

13. Many of the draft allocations and sites within the Areas of Growth and Regeneration fall within Flood Zones 2 and 3. There are less-constrained sites for allocation which the Council have failed to assess and allocate.

14. SJA site falls within Flood Zone 1, the area at lowest risk of flooding. There is no justification for choosing to allocate sites which fall within areas of higher flood risk. If the Council wants to ensure it meets its housing targets, it should be allocating sites which are not constrained. The Council's SHLAA even acknowledges that SJA's site has no known constraints.

Other Matters

- h) How were effects on air quality and the presence of air quality management areas (AQMA) taken into account in site assessment? Are any allocated sites within an AQMA and how does the Plan ensure such development would be acceptable?
- i) How were the effects on open space and green infrastructure assessed? For example, on what basis was it determined that some allocations did not need to be retained as part of the City's green infrastructure / open space provision?
- j) Were other factors such as the effect on landscape character, biodiversity and heritage appropriately taken into account as part of the site selection process?

k) How was appropriate mitigation for the impacts of development, individually or cumulatively, identified and is this adequately reflected in relevant policies?

15. There has been no evidence presented as part of the local plan to demonstrate that any of these factors have been taken into account by the Council when assessing and allocating sites. The Council's assessment of sites seems to be limited to the SHLAA, which only describes the site and its features, failing to reach an assessment of potential impacts. Unlike an appropriate methodology usually adopted for SHLAA's, there is no way of assessing sites against each other.

16. In addition, there has been a different methodology undertaken in assessing the sites in the SHLAA (Appendix C) to those chosen as proposed allocations. The Council uses a Sustainability Appraisal matrix for the proposed allocations, whereas the 13 sites in Appendix C only have a descriptive element, which doesn't provide any assessment of their constraints, nor reach a conclusion on potential for allocation.

17. Instead, as outlined in Council's answer to PQ18, they expect the development industry to progress sites at their own cost and risk, with no policy position. The SJA's site does not have any known constraints, falls within Flood Zone 1, and is previously developed land. It does not include any heritage constraints, or fall within an AQMA and the redevelopment of the site would not result in loss to any open space (l and j). There is no justification or assessment as to why the site has not been allocated.

l) Has the deliverability of allocations been appropriately assessed, having regard to infrastructure provision and other policy requirements?

18. The Council have not given appropriate consideration to the deliverability of allocations. The SHLAA makes little reference to the deliverability or trajectory of sites. The Council has not outlined any specific infrastructure interventions to enable them to meet their anticipated delivery of 1,925 homes. They state in their answer to the Inspector's question (PQ67) that the plan aspires to exceed that target if services and infrastructure permit.

19. Turning to the deliverability of sites with planning permission, the Housing Need and Supply Topic Paper (TPC004) includes the below table:

Source	Capacity
Areas of growth and regeneration	20,386
Planning permissions	9,087
Existing development allocations	1,381
Proposed development allocations	1,125
Green Belt locations	1,400
Small sites windfall	3,600
Urban potential	2,219
Student accommodation	600
<b>TOTAL</b>	<b>39,798</b>

20. The table sets their capacity at 39,798 homes and includes a figure of 3,600 homes to be delivered on small windfall sites. There is no evidence within either the SHLAA or Topic Paper as to what this 3,600 figure is based on, or whether the sites from Appendix C of the SHLAA are anticipated to contribute towards it. In answer to PQ18, the Council state ‘the potential future development of these 13 sites is not ruled out by the local plan’. However it fails to state whether they will be contributing towards the windfall figure. Without any policy position, it is likely that many of these sites within Appendix 13 will fail to come forward, and the Council could risk missing out on 9% of its housing delivery. SJA are a charity and without a policy position on the site there is no incentive for them to release crucial funds to progress an application.
21. A lack of understanding of the deliverability of these sites, including those which are allocated, could result in the Council significantly under delivering on its anticipated housing figures.
22. Given the above, SJA request that their Harry Crook Centre site is allocated for a residential-led scheme to provide certainty through the plan-making process.

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