

Draft revised Regional Spatial Strategy for the South West incorporating the Secretary of State's proposed changes

North Somerset Council response to consultation

This statement summarises the Council's key concerns, initially as headline bullet points, followed by a more detailed explanation. Further information, including representations related to other policy areas, is set out in the formal response to consultation.

Headline issues:

- The implications of the current economic situation need to be acknowledged, realistic delivery rates identified and clear phasing policies introduced. The RSS allocations should be phased in four 5 year tranches with a clear commitment to a review at the end of each tranche; the first being in 2011. The allocations for the first phase must take into account the critical downturn in the economy; subsequent phases must be realistic in terms of what is deliverable.
- Essential infrastructure must be delivered in step with, and where appropriate, ahead of development. A clear RSS policy commitment to the need for structured delivery plans is essential to the delivery of sustainable and mixed communities.
- Priority must be given on a sub-regional basis to the delivery of brownfield and urban infill sites before green field and Green Belt locations.
- At draft RSS stage, North Somerset reserved its position on the sub-regional growth agenda pending assurances on infrastructure requirements, delivery and phasing, Green Belt assessment, site appraisal and a comprehensive sustainability appraisal, and evidence that the Regional Assembly, the Government and national regeneration agencies could deliver the necessary infrastructure investment. The Council remains concerned that the ambitious housing allocations set out in the RSS remain unsubstantiated and, in the current economic climate, undeliverable. The Council would urge the Secretary of State to take a more precautionary approach to delivering new development based on phased 5 year tranches and regular reviews of the RSS.
- The Council objects to the increase in the North Somerset housing allocations proposed in the RSS, and furthermore considers that the existing numbers and locations must be reassessed in line with the points raised above.
- The quantum of development proposed for North Somerset must reflect both a realistic employment-led strategy in terms of balancing jobs and homes (and, where appropriate, taking account of the existing backlog, particularly in Weston-super-Mare), and a realistic assessment of delivery given the state of the economy.
- More flexibility is required to enable North Somerset to locally determine the most sustainable locations for growth within the district.
- RSS must more clearly articulate the reasons for Green Belt amendments and the definition of its general extent.
- Objection to the further deletion of Green Belt at Royal Portbury Dock.
- Objection to the further deletion of Green Belt at Bristol International Airport.
- Objection to the deletion of the proposed areas of Green Belt extension.
- Affordable housing target should not be increased to 35%.
- Density policy relating in particular to urban extensions is too high.
- Given the economic circumstances, the proposed partial review of the RSS should review the period 2006-2011 and rigorously test and assess future housing allocations for subsequent phases.

Overall level of growth:

Across the South West as a whole the Secretary of State's Proposed Changes include a 29% increase in housing provision to (up from 459,550 to 592,460 dwellings). This was higher than the Panel Report's recommendation of 569,450 dwellings. North Somerset shares the major reservations of the Regional Assembly on the region's capacity to accommodate this growth without further consideration of the possible effects on sustainability, the environment and quality of life. There appears to be a lack of sound evidence underpinning some of the Panel's recommendations and the Secretary of State's Proposed Changes, particularly the increase in housing numbers, and the lack of clarity in respect of the provision of essential infrastructure and services needed to enable and support the growth.

The proposed level of growth is also predicated on an ambitious level of economic development, the deliverability of which over the plan period must be questioned in the current economic climate. The current economic crisis emphasises the importance of clearer phasing and monitoring of development, and the need for phasing to be related to infrastructure delivery.

The RSS Proposed Changes document starts with a letter from Baroness Andrews to the Chair of the SW Regional Assembly. In this she states that "the Government is committed to ensuring that development that delivers sustainable communities is accompanied by the infrastructure and services that they need and that these are delivered at the right time". Unfortunately the Secretary of State deleted the sub-regional infrastructure priorities set out in the draft RSS. To do this the region will need clear and unequivocal assurances that the Government will support:

- i) Adequate investment in infrastructure.
- ii) Detailed assessment of delivery at regular intervals (5 year tranches).
- iii) Commitment to the highest standards of development.

North Somerset requests that, given the economic situation and the undeliverability of the ambitious growth agenda, that the proposed partial review of the RSS examines detailed phasing of the four 5 year tranches with a view to testing and assessing the future spatial requirements post 2011. This would enable the 2006-2011 situation to be reviewed, and, with a requirement for review every 5 years, a precautionary approach to be taken to future phases.

North Somerset housing allocations:

The Secretary of State's proposed changes propose that the Panel Report's recommendation of 26,750 dwellings for North Somerset is confirmed (up from 26,000 in the draft RSS).

This is sub-divided as follows:

Weston urban extension	9,000
Weston urban area	3,000
SW Bristol urban extension	9,000 (plus 1,500 within Bristol City)
Remainder of NSC	5,750

This scale of growth represents a massive challenge in terms of delivery over the 20 year period, and raises major concerns over the market's ability to maintain this sustained rate of house building. This has been a consistent theme in this Council's response to the RSS agenda. When considering the draft RSS in July 2006 Executive Committee resolved that the Council reserves its position regarding both "the detailed Sub-Regional Strategy for the West of England, pending the provision of adequate information relating to infrastructure requirements, delivery and phasing, green belt assessment, site appraisal and a

comprehensive sustainability appraisal” and “the deliverability of the growth strategy pending clear unequivocal evidence that the Regional Assembly, the Government and the national regeneration agencies could deliver the transport, employment and other infrastructure investment needed prior to development taking place, in accordance with the sustainable communities agenda”. At that time the Council was “minded to object to the proposed dwelling requirement for North Somerset as, notwithstanding the absence of detailed evidence referred to above, the overall level of growth is unlikely to be deliverable within the Plan period and should be reduced from 26,000 to a maximum of 24,500 dwellings”.

The Council remains unconvinced that the scale of growth envisaged has been robustly justified, will be supported by essential infrastructure, and, in the current economic climate, will be delivered – with the danger that what is delivered will be at the cost of reduced quality in terms of design, energy efficiency and developer contributions to support the sustainable communities objectives.

Delivery:

Delivery remains a fundamental concern, and North Somerset will seek further reassurances that appropriate infrastructure is delivered in step with and, where appropriate, ahead of development. North Somerset is already suffering from inadequate investment in transport and community infrastructure from previous and current strategic residential allocations which, coupled with the loss of major employers, has resulted in a considerable imbalance and unsustainable development patterns. Despite work progressing on the Core Strategy and strategic masterplanning/delivery plans, it remains the view that this quantum of development is going to be virtually impossible to deliver, and to force the rate of development to unrealistic levels could severely compromise the overall quality of new development. The implications of the credit crunch and the significant downturn in the housing market further question the likelihood of this scale of development being delivered during the plan period. The current level of regional funding allocation on transport which is inadequate further adds to the doubt about government allocating sufficient funds to meet the infrastructure need between now and 2016.

Within North Somerset, net housing completions are significantly down. Early results from monitoring at 1st October 2008 indicate that large site completions (sites of 10+ dwellings) over the last 6 months totalled 360 dwellings. This compares with the last annual figure of 1185 dwellings 2007/08. However, a much higher proportion of these than normal (154 dwellings) were affordable. It is anticipated that the next half year will experience a further steep decline as new planning applications for residential units have all but dried up, and supply will take several years to build up to previous rates. The implications of the economic situation will affect RSS delivery, and the ambitious economic forecasts and housing numbers must be modified to take this into account.

Districts such as North Somerset with a high proportion of growth in the form of urban extensions will quickly become vulnerable to appeals based on a lack of a 5 year supply of housing land if the economic situation further delays their delivery. This is likely to lead to pressure on less sustainable locations, potentially contrary to the overall objectives of the RSS spatial strategy. The RSS needs to provide clear guidance on how local planning authorities should deal with these circumstances, to ensure that development takes place at the intended spatial locations.

The phasing and sequencing of strategic sites across the West of England needs to be clearly articulated within the RSS to ensure that priority is given to brownfield sites and locations which will address regeneration objectives. This requires a more sophisticated approach to creating a complementary package of strategic sites to ensure that a range of

development opportunities are available, and where greenfield/Green Belt sites are generally accorded lower priority. Phasing by 5 year tranche would assist in this approach by ensuring that brownfield sites are prioritised, and the sequential principles as set out in PPS3 are followed.

Working with the West of England Partnership, North Somerset argued that the level of economic growth proposed in the draft RSS was ambitious and unrealistic. Regional economic growth has approximated national growth rates in the past with the West of England running about 0.2% above national forecasts which currently predict growth in 2008 at 1.7% GVA and 1.5% in 2009, then climbing to 2.5% pa for 2010 and 2011. The RSS is based on an assumption of 3.2% across the region. This translates to an extra 6,000 jobs pa arising in the West of England (or 12,000 2006-2026). These extra jobs imply a need for a significant increase in dwellings. However, this employment growth has been historically concentrated in Bristol and the North Fringe with North Somerset not meeting its employment goals. There is no evidence that this will change without major improvements in the highways and transport infrastructure being carried out ahead of more new development.

Allocations for the 'remainder' of North Somerset

There appears to be little justification for the additional 750 dwellings allocated in the 'remainder' of the district. This appears to be a regional 15% uplift across the rural patch regardless of the geography and sustainability implications. The geography of North Somerset in relation to the SSCTs of Bristol and Weston means that the effect of this would be a requirement to locate this additional growth in settlements which already experience a high degree of out-commuting, and would increase the development pressure on towns and larger villages contrary to RSS objectives. North Somerset objects to this increased allocation; although if this increase is retained, then NSC should be permitted greater flexibility in terms of where this growth should be accommodated.

Settlement hierarchy

Most new development will be at Strategically Significant Cities & Towns (SSCTs) such as Bristol & Weston. Provision for more limited development will be made at 'market & coastal towns' defined as those with an existing concentration of employment, facilities and services that meet the needs of the settlement & surrounding area, and with sustainable transport modes. Within these areas provision will be made for housing, employment, shopping & other services that increase their self-containment & enhance their roles as service centres". In 'small towns & villages' greater self-containment & stronger local communities will be promoted by making provision that supports an appropriate scale of economic activity, extends the range of services, and meets identified local housing needs. The Core Strategy will identify which settlements fall into which category.

This approach continues the existing strategy of concentrating development at the larger urban areas with limited opportunities elsewhere, and then only where this leads to greater self-containment.

While there is no objection to the settlement strategy, more flexibility is needed to enable North Somerset to identify where the RSS housing allocation can be most sustainably accommodated – rather than the specific sub-district housing numbers as set out in the RSS.

SW Bristol

The RSS proposed changes confirm the proposed allocation of 10,500 dwellings at SW Bristol (9,000 NSC/1,500 BCC).

At the draft RSS consultation stage the Council accepted the principle of new urban extensions at Weston and SW Bristol (subject to the caveats set out above), but maintained that the NSC element of the latter should be no more than 7,500 dwellings – primarily on the grounds that this was unlikely to be delivered over the plan period. Given the current economic situation, North Somerset proposes that the partial review of the RSS reassesses the appropriateness of the scale and form of development proposed.

Despite representations to the draft RSS that this development should be phased and delivered in step with south Bristol regeneration, this was not supported in the proposed changes. The SW Bristol Planning Together Stakeholder Workshops held in April 2008 and ongoing masterplanning, design coding and delivery plan work has demonstrated the complexity of issues surrounding this development. Delivery of infrastructure in phase with the development remains critical; as is effective joint working with Bristol and the West of England Partnership. Brownfield development should proceed first, unless infrastructure needs require otherwise.

Any proposed reduction in the Bristol City element of 1,500 dwellings must not be reallocated to North Somerset.

Weston-super-Mare

9,000 dwellings are proposed to be provided at the urban extension, with an additional 3,000 within the existing urban area, and 10,000 jobs including about 34ha employment land.

The phrase now used is that Weston “will secure concerted employment-led regeneration” by providing for the “revitalisation of the town centre and sea front through improved retail, leisure & cultural facilities & public realm”, a better balance between homes and jobs with “an emphasis on significantly improving the employment offer of the town & reducing the impacts of car based commuting” with “housing growth to be phased & linked directly to job growth”.

The policy approach is clear that housing is linked to job growth and this is strongly supported. However, it is curious that a policy predicated on improving self-containment in fact allocates more houses than jobs, thereby potentially contributing to further reducing self-containment and worsening the current out commuting problems in the future. The South West RSS Sustainability Appraisal prepared for the Secretary of State in fact states that:

“Car based commuting between Weston-super-Mare and Bristol is a significant issue in the Housing Market Area. The intention of the HMA strategy is to encourage Weston-super-Mare to become more self-contained, however, we think the lower provision of jobs (10,000) compared to homes (12,000) may in fact increase travel to Bristol. The Panel Report notes that due to existing trends in Weston-super-Mare, simply synchronising jobs and housing is unlikely to greatly improve self-containment.” (Paragraph 10.80).

In the Strategic Sustainability Assessment of the draft RSS (March 2006) Table 10.4 compared jobs to homes ratios within SSCTs. Weston was identified as having the second lowest ratio (1.15) in the region. Assuming that the jobs and homes provided for in the draft RSS were delivered, by 2026 this ratio was expected to fall further to 1.08. An additional 13,800 jobs would be required just to maintain a 1.15 jobs to homes ratio based on 12,000 dwellings. As job growth of this scale is extremely unlikely, a more realistic approach would be to reduce housing numbers from 12,000 to 8,700 to maintain the 1.15 ratio based on 10,000 jobs.

North Somerset 's monitoring of jobs and housing in Weston reveals that over the first two years of the plan period the self-containment situation has deteriorated significantly despite the adoption of the employment-led strategy in the Replacement Local Plan.

At April 2006 the baseline situation for Weston-super-Mare urban area (not TTWA) was as follows:

34,796 economically active
32,981 households
29,129 employment opportunities
Imbalance = 3,852 jobs

Annual changes:

April 2006 – March 2007:

220 job opportunities
1132 net additional dwellings
Imbalance = 5,052 jobs

Annual changes:

April 2007 – March 2008:

445 job opportunities
2606 net additional dwellings
Imbalance = 6,321 jobs

This combination of existing residential allocations and slow employment growth has meant that the imbalance has already widened from an estimated 3,852 jobs in 2006 to 6,321 jobs in 2008.

It also remains unclear as to what happens if the required quantum of employment fails to be delivered. Can additional housing growth then be resisted? North Somerset needs reassurance that residential completions will be firmly linked to employment generation (proposed 1.5 minimum jobs created per dwelling built) in order to reduce existing out-commuting. This again emphasises the importance of phasing.

Infrastructure provision is also critical to ensuring successful delivery, particularly transport improvements such as through the Weston Package, and flood management as much of the Weston Regeneration Area is within flood zone 3. Falling development values could have a significant impact on critical infrastructure provision.

North Somerset would also like more flexibility in dealing with the Weston housing allocation as a whole (ie the urban area and urban extension combined) to ensure that brownfield and sequentially better sites are accorded priority. This should be tested and assessed as part of the proposed partial review of the RSS.

Green Belt

The RSS must be much clearer in terms of identifying what is the general extent of the Green Belt which will be amended upon adoption, and what are the exceptional circumstances underpinning these decisions.

The proposed RSS policy refers to the following alterations to the Green Belt within North Somerset:

SW Bristol urban extension – Policy HMA1 states that the Green Belt will be removed to accommodate urban extensions at areas of search, but as the SW Bristol urban extension remains an area of search, no clear indication of the boundary of the general extent is proposed. The RSS Key Diagram shows 14 grey squares clearly within the existing Green

Belt, and a symbol to represent 'change to the general extent of the Green Belt'. This doesn't provide the necessary clarity and certainty. However, the dilemma is that the necessary work has yet to be done to finalise the detailed form and extent of the development, and therefore the change required to the general extent of the Green Belt. North Somerset would like a mechanism in place to ensure the phased release of Green Belt as the urban extension develops – this is particularly important considering uncertainties over delivery in the current economic climate.

Removal of land between Royal Portbury Dock and M5 – this is not required following confirmation of the Replacement Local Plan (adopted March 2007), and reference should be deleted from the RSS. The Replacement Local Plan clarified the potential further development area of Royal Portbury Dock in relation to Green Belt issues by removing land at Court House Farm (17ha) from the Green Belt, and no further Green Belt release is appropriate. The small strip of land referred to in Policy HMA1 between the Port and M5 is highly constrained and was not identified as developable by the Port in the context of the Local Plan Inquiry. Paragraph 4.1.3 fails to set out the exceptional circumstances why the Green Belt boundary needs to be altered in this location given in particular, opportunities to the north of the Avon.

Removal of land at Bristol International Airport – this is premature and would commit this Council to further Green Belt change before the longer term spatial requirements of the airport have been determined. The Replacement Local Plan identified land requirements to cater for 9 million passengers pa which it is anticipated that the Airport will achieve in 2019, and deleted 45ha of Green Belt to accommodate this. The master plan only considered the development implications of further expansion beyond this period in outline. The spatial implications of longer term development within the RSS plan period have yet to be determined, and the RSS proposed Green Belt deletion pre-judges this debate. Paragraph 4.1.3 fails to set out the exceptional circumstances whereby further change is required to the Green Belt at BIA.

Green Belt extension - the Council objects to the deletion of the proposal to extend the Green Belt to the SW of Nailsea. Given the proposed deletion of Green Belt at SW Bristol, compensatory Green Belt should be created in this location to retain its effectiveness in meeting the purposes of the designation.

Housing issues:

Affordable housing - in the context of the North Somerset housing market and the Council's desire to balance the increasing demands placed on developer contributions, the Council wishes to maintain the established policy of seeking 30% affordable housing on new development. It therefore objects to the Secretary of State's proposal to increase this to 35%.

Density – the RSS target is 40 dwellings/ha, 40-50dwellings/ha within SSCTs such as Weston, and 50 dwellings/ha in urban extensions. There is concern that the latter is unrealistically high when considered across a large urban extension which will contain a wide range of housing types, and could prove a constraint on delivering a high quality sustainable development that meets objectives of place shaping and creating mixed and balanced communities. The policy implies a hierarchy of density, whereas in fact the opportunities for higher density housing are likely to be within existing city and town centres. The RSS should set out a single density target of 40 dwellings/ha, whilst acknowledging that this could be more where circumstances permit.

Further detailed comments are set out in the formal response.

