

HEARING STATEMENT ON BEHALF OF SOUTH WEST STRATEGIC DEVELOPMENTS

MATTER 3: POLICIES

'Q3: In those settlements and locations where the consequential changes have significantly increased the housing requirement, can it be demonstrated that the capacity exists to deliver the increased number of homes to enable the Core Strategy housing requirement, including those of the consequential changes, to be met in the following locations, in terms of overall numbers and housing mix?

- a. Policy CS28: Weston-super-Mare*
- b. Policy CS30: Weston Villages*
- c. Policy CS31: Clevedon, Nailsea and Portishead*
- d. Policy CS32: Service Villages*
- e. Policy CS33: Infill villages, smaller settlements and countryside'*

- 1.0 We welcome the identification of this issue. As set out in our main representations we have significant concerns that no meaningful change has been made to many of the plan's policies to adjust to the reality that housing numbers have been increased significantly.
- 1.1 In respect to policy CS28 at paragraphs 3.6-3.8 of our representations we identify that the minimum residual requirement for Weston-super-Mare is 650 dwellings (this figure was presented to Committee in the October 2015 Executive Report). However, it is our view that this should be a minimum residual figure because the level of windfalls are overstated and the housing figures should be seen as a minimum requirement to ensure flexibility and choice and competition in the market for land (in compliance with paragraph 47 of the Framework).
- 1.2 Furthermore, the Council state that the residual requirement will be dealt with via new allocations. This will happen as part of the emerging Site Allocations document that has been subject to consultation in April 2016. After the consideration of representations by officers and various committees, further consultation will be required in connection with the submission draft of this plan and the Council currently anticipate that the plan will be adopted in April 2017.

- 1.3 At the present time the emerging Sites and Policies Plan Part II: Site Allocations should be afforded limited weight. Objections to the recently published draft Site Allocations Plan should be taken into consideration and this may result in current proposals being removed or amended. This has previously occurred in relation to North Somerset and is common throughout the UK. We also consider that the current timetable is optimistic. Accordingly the potential for delay and uncertainty needs to be positively planned for.
- 1.4 We propose that this should be dealt with via a permissive policy as we identify in our main representations. This should apply to sites that lie adjacent to the existing urban area of Weston-super-Mare where development would be accessible to key services and not be subject to designations or features that would mean that significant adverse effects would arise from its development.
- 1.5 By proposing such a policy which is focused on Weston-super-Mare this would also ensure that the Core Strategy's spatial strategy is adhered to. This is of particular relevance given that recent decisions reached by the Council's committee have only allocated one new site for the town out of a total of 14 new allocations proposed in February of this year. This decision making does not seem to be in compliance with the spatial strategy.
- 1.6 As highlighted in our main representations such permissive policies have been used in many other authority areas where a site allocations plan is to follow the main Core Strategy. It is especially required in North Somerset because even against the backdrop of a five year housing land supply deficit, officers are still maintaining that settlement boundaries are sacrosanct and that development located outside of them, no matter how well located to shops and services, is inappropriate. Without a permissive policy this situation will continue and the five year housing land supply will deteriorate further.

'Q4. Is the plan, with the consequential changes, flexible and resilient enough to ensure that the housing requirement is met? Are there modifications that need to be made to make it more flexible and resilient? In particular, should there be more flexible wording in respect of:

a. Policy CS32: Service Villages

b. Policy CS33: Infill villages, smaller settlements and countryside

c. Any other location covered by the policies relevant to this examination'

- 1.7 In our opinion no further flexibility in respect to these locations is justified. The spatial strategy, appropriately, focuses on the primary settlement of Weston-super-Mare and the three second
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tier towns and that is where additional development should be focused to meet the NPPF's requirement to maximise the potential for residents to use sustainable transport modes.

- 1.8 By providing the ability to provide greater levels of housing in the smaller service villages and other settlements the spatial strategy will be undermined. Therefore we request that no change to these policies is made.

'Q5. Does the increased housing requirement justify any modification to:

a. Policy CS6: Green Belt

b. Policy CS19: Strategic Gaps'

- 1.9 Based on the strategic gaps policy presented in the emerging Site Allocations Plan we do not consider that any modification to either policy is required. Capacity to accommodate further development exists on land adjacent to the urban edge of Weston-super-Mare at land north of Oldmixon Road and no Green Belt land release, or land located within the currently identified strategic gaps, should be considered unless further land is required in addition to the land identified in appendix A of our main representations.