

North Somerset Core Strategy

Examination into the soundness of the consequential changes to policies CS6, CS14, CS19, CS28, CS30, CS31, CS32 and CS33

North Somerset Council response to Inspector's matters and issues for examination

May 2016

Matter 3 – Policies

Issue 4 – 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

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?

The policy framework

1. The Core Strategy is a strategic plan which provides an overall framework for the delivery of housing. It contains a strategic allocation at Weston Villages currently anticipated to deliver 6,500 dwellings and spatial policies related to the settlement hierarchy.
2. The drafting of the remitted policies is flexible and can accommodate a range of growth options. It was never the intention of the original Core Strategy to constrain the supply of housing; even with a Core Strategy target of 14,000 dwellings, the Consultation Draft Sites and Policies Plan in 2013 identified a capacity of just over 18,000 dwellings (OD/07). This demonstrates the flexibility of the plan which enabled the Council to boost significantly the supply of housing in excess of the Core Strategy previous minimum target.
3. The 2016 Consultation Draft Site Allocations Plan makes provision for 21,114 dwellings (CC/10). This again demonstrates the inherent flexibility in the Core Strategy approach.
4. The flexibility and resilience is the consequence of both a spatial strategy which provides the context for a range of opportunities to come forward at sustainable locations, as well as site allocations to be brought forward through the detailed plan-making process.

5. The Core Strategy approach is to provide more flexibility at the more sustainable locations. At Weston-super-Mare new development proposals are encouraged (Policy CS28), while at the other towns development within settlement boundaries will be supported with no restriction on the scale of development (Policy CS31). Within the service villages small scale development within settlement boundaries appropriate to the scale and character will be supported but 'small scale' is not defined (Policy CS32). At the smaller, less sustainable infill villages, infilling is acceptable within settlement boundaries, and defined as one or two dwellings, or small scale residential redevelopment where the proposal is community led with clear community and environmental benefits (Policy CS33). There is therefore more specificity and control over proposals at less sustainable locations.

6. If the plan was inflexible, then it would be expected that that there would be little opportunity to bring forward sites once allocations had been delivered; opportunities would effectively dry up. This is not the case with the North Somerset Core Strategy. The plan is at its mid-point and the following table sets out completions by spatial category in relation to the originally adopted anticipated distribution (based on a housing target of 14,000 dwellings) and the current May 2016 apportionment.
 - Delivery in the Weston urban area is broadly on track, given that this period included a significant economic downturn, and the current emphasis on urban regeneration which is expected to result in a pick-up in delivery over the next few years.
 - Weston Villages is different in that it is a strategic allocation with a specific development trajectory which demonstrates that the bulk of the housing will be delivered over the last 10 years of the plan period.
 - Development at the towns is ahead of the curve as during the early years the planned expansion of Portishead development was underway and which is now built out. The focus for the remaining years of the plan period is likely to be proposed allocations at Nailsea.
 - Given five year supply pressures, the April 2016 distribution indicates a higher proportion of the anticipated development taking place at service villages than in the original Core Strategy. This is reflected in the Site Allocations Plan proposed allocations.
 - Development at infill villages, and countryside which will be primarily through small scale windfall is consistent with what is anticipated to be delivered.

	Originally adopted (2012) CS14 proposed distribution	Completions 2006-2016 (first 10 years)	April 2016 proposed CS14 distribution	% completions in relation to April 2016 proposed CS14 distribution
Weston urban area	3,458	2,895	6,300	46%
Weston Villages	5,500	567	6,500	9%
Towns	3,715	3,251	5,100	64%
Service villages	805	706	2,100	34%
Infill villages & countryside	522	576	985	58%
	14,000	10,890	20,985	

7. A balance between the allocated sites and other opportunities provides the reassurance that the Core Strategy contains the necessary resilience to ensure that the housing requirement is delivered. If necessary, further opportunities could be provided by amending settlement boundaries through the Site Allocations Plan.
8. The Council's position is that the detailed plan-making process has demonstrated that there is sufficient flexibility in the Core Strategy approach to provide the necessary resilience to ensure the housing target is delivered. The examination of the Site Allocations Plan will test the proposed approach and the sites in detail, but if further capacity is needed this could be provided through new allocations and/or amendments to settlement boundaries.

Issue 4 – 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

9. The wording of the policy in respect of the size of development is considered to be fit for purpose and commensurate with the character and relative sustainability of the settlements in question. 'Small scale' is not defined in terms of numbers and there is no cap on the maximum size of scheme which might be acceptable. Instead of a dwelling number, the policy test is that it is 'appropriate to the size and character of the village which respects the character of the village and supports or enhances the village's role as a local hub for community facilities and services, employment and affordable

housing, including public transport'. This means that the scale of development acceptable will vary according to local circumstances such as the size of the settlement and its sustainability credentials.

10. The policy is proposed to apply within the settlement boundaries with any additional sites brought forward as local plan allocations. This is in accordance with the plan-led system and provides certainty to rural communities. An alternative would be to permit development outside settlement boundaries. This could lead to a substantial amount of uncontrolled growth at villages and could undermine the spatial strategy by encouraging a higher proportion of growth at relatively less sustainable locations. In order to address this, such an approach would require more specific guidance written into the policy on the scale and form of development which would be acceptable.
11. The Council's preference is that the quantum of development which is identified as being appropriately located at service villages should be allocated through the plan-making process. The Site Allocations Plan will need to demonstrate how the housing requirement will be delivered, including, at the service villages, the amount anticipated to come forward within settlement boundaries (adjusted as appropriate) plus specific allocations.
12. When considering allocations, the policy currently relates to proposals 'which demonstrate clear local benefits' and 'are supported by the local community'. Several representations want to delete the latter phrase. The Council would prefer to retain this wording as it is an important part of the planning system to consider the views of local communities and which must be balanced alongside other material considerations. This is particularly important in village locations where there is generally much more local engagement on development issues as the impacts are often relatively more significant than at the towns. The proposed approach is necessary to encourage developers to engage more effectively with communities and enable the schemes to be shaped by a better understanding of local circumstances and needs.
13. The term 'identified community benefits' has been suggested to be unnecessary and ambiguous. It is capable of being flexibly interpreted but that is important as there are a number of factors which may need to be taken into account. It is necessary because it is important to clearly articulate the benefits from the proposed development for the local community.
14. It has been suggested that more flexibility is needed because of a lack of five year supply. However, if at some point in the future it was concluded that there was a lack of 5 year supply, then NPPF paragraph 49 would be taken into account, regardless of the wording of the plan.

15. Some representations have sought to suggest that the new categories should be created in the spatial hierarchy for larger or smaller villages. This is unnecessary as the existing wording provides sufficient flexibility. If there were additional layers, then new wording would be required to stipulate the size and form of development which would be appropriate. It is not clear how this would be supported by the evidence base.
16. The Council does not support the suggestion that certain villages should be re-designated. The consequential changes relating to the increased housing target can be accommodated within the existing spatial strategy and settlement classification.
17. The basis for the original service village designation is summarised in the supporting text to Policy CS32. Service villages are generally those larger settlements (2000 to 3000 population) containing key facilities and a range of other shops and services which provide a service role function beyond their immediate locality. It is emphasised that the classification is not solely determined by size or the number of facilities and that the designation took account of local circumstances.
18. In February 2016 the Council undertook an assessment to provide an indication of the relative sustainability of settlements (CC/15). This confirms in broad terms the appropriateness of the North Somerset settlement hierarchy. A quick visual representation of the findings is set out in the table 'relative settlement sustainability at a glance' (CC/15 Appendix D). This shows that overall the service villages score more strongly in relation to the sustainability indicators than the infill villages. This is not a precise art and it will be a matter of judgement as to which are both currently the most sustainable settlements and which may have most potential/opportunities over the plan period.

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

19. This policy relates to the least sustainable locations in North Somerset. It is not appropriate to target additional growth to these locations which would be contrary to the NPPF objective of delivering sustainable development. The additional shortfall required as a consequence of the adoption of CS13 should be accommodated at Weston-super-Mare, the towns and service villages. The Council's position is that this can be accommodated through the existing policy framework. Even if the Council is wrong, then it is these other policies which may need to be adjusted, not CS33. For this reason it is not appropriate to make reference in the policy to the potential of identifying allocations at infill villages. There may be scope for some adjustments to be made to settlement boundaries, but that is a matter for the Site Allocations Plan.

20. A number of representations suggest that the Council's approach is too restrictive and in effect amounts to an embargo on development in the smaller villages and countryside. This is not the case. Despite a restrictive policy approach, between 2006 and 2016 576 dwellings were completed at infill villages and countryside; 58% of the total of 985 dwellings currently anticipated to be delivered from this category.
21. It is suggested that the affordable housing reference is contrary to government guidance. Policy CS33 states that 'affordable housing will not be permitted in the Green Belt'. NPPF paragraph 89 states that the construction of new dwellings is not inappropriate where it comprises 'limited affordable housing for local community needs under policies set out in the local plan'. The local planning authority is thus able, if it so chooses, provide a policy context to support its delivery. The adopted extant Policy CS17 states that rural exceptions schemes will not be permitted in the Green Belt unless justified by very special circumstances. Policy CS33 is consistent with this approach.

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

22. It is considered that the approach taken at the towns (Policies CS28, CS30 and CS31) is already flexible and resilient enough to ensure that the housing requirement is delivered.
23. CS28 Weston-super-Mare sets out the overall anticipated number of dwellings anticipated to be accommodated. This is a supportive policy which encourages new development proposals. The only clear spatial policy restriction is against development leap-frogging the M5.
24. Policy CS30 sets out the context for the development of the strategic allocation at Weston Villages which was the subject of a masterplan framework approved as an SPD (OD/09). The site which comprises two principal development areas, Winterstoke and Parklands Villages, is currently under construction.
25. Policy CS31 supports development within settlement boundaries at Clevedon, Nailsea and Portishead. Nailsea is specifically identified as the town with most new potential and provides the opportunity for bringing forward development sites through the Site Allocations Plan.
26. The Consultation Draft Site Allocations Plan (CC/10) demonstrates that sufficient sites can be brought forward at these other locations to deliver the identified housing shortfall.