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& Partners**

Planning. Design. Economics.

**North Somerset Core Strategy**

**Hearing Statement: Matter 3**

Barratt Homes (BDW Trading Ltd)

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31345/JCO/CK

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## 1.0 Policies

**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?**

- 1.1 Due to the fact that NSC considers that only 1,715 additional dwellings are required to be identified to meet the 20,985 figure, NSC contend that the additional growth can simply be accommodated in accordance with the spatial strategy, meaning that minimal changes are required to the remaining remitted policies. NLP disagrees with this and contends that to continue with the same spatial strategy would be contrary to the *'justified'* test of soundness which seeks the most appropriate strategy for development.
- 1.2 NLP accepts the Council's recognition that there is only limited scope for growth with regards to Weston Villages and the second tier of settlements of Clevedon, Nailsea and Portishead. NSC states:  
*"The overall context for the three towns remains broadly the same – existing Green Belt and flood constraints mean that potential opportunities adjacent to the settlement boundaries are limited."*
- 1.3 Additional constraints include AONB and the Bristol Channel.
- 1.4 However, NLP is concerned about the very ambitious assumptions that are being made about the housing delivery in Weston Super Mare (excluding Weston Villages) where the proposed supply which was already high has increased by 87%.
- 1.5 The additional sites now being proposed in Weston Super Mare are complex regeneration schemes most of which the Council acknowledge won't contribute to the five year land supply. These include sites that require demolition, remediation as well as sites that include Listed Buildings such as Weston Library (Grade II), Birnbeck Pier (Grade II\*) and the Magistrates Court (Grade II). Of the additional 1,300 dwellings proposed at WSM (excluding Weston Villages) only 370 completions are expected in the next 5 years (up to 2020).
- 1.6 Based upon the above trajectory, the Council is assuming the residual 1,000 dwellings to be delivered within the last six years of the plan period. However, given the complex nature of these sites, NLP considers the delivery assumptions unrealistic. There is no evidence provided to demonstrate that these sites are developable (i.e that they will be available and could be viably developed at the point envisaged) as required by NPPF paragraph 47 footnote

12. There must therefore be doubt about the ability of these sites to contribute to plan delivery at all. It also means that there is a very significant back loading of sites that again brings into question the Council's ability to maintain a five year housing land supply. Enclosed at **Appendix 1** is a summary of the above sites with NLP commentary.

1.7 NLP notes that the Councils preferred methodology for the calculating the five year land supply as set out in the April 2015 Position Statement is the Liverpool methodology.

1.8 Brandon Lewis, the Minister for Housing and Planning wrote to NSC on 18 September 2015 confirming the appropriate housing requirement figure for the purposes of assessing the Council's land supply as 20,985. In his letter, Brandon Lewis also confirmed that the Inspector's recommendations in respect of the Examination of Policy CS13 set out in his report of 11 March 2015, apply and reflect national policy correctly. These recommendations include a very firm statement in his paragraph 60 that the MD6 version of Policy CS13 that sought to deal with the backlog over the whole of the plan period (Liverpool approach) would not comply with the latest national guidance. The national policy position on the preferential use of the Sedgfield approach is therefore unequivocal and NLP is perplexed as to why NSC is still seeking to utilise the Liverpool approach.

### **Is the plan, with consequential changes, flexible and resilient enough to ensure that the housing requirement is met?**

1.9 There is no realistic prospect of meeting the minimum housing requirement figure by utilising the Council's revised distribution of growth. Instead, NLP believes that the Council should take a more balanced approach to the distribution of housing; planning for a higher proportion of housing growth within the Service Villages which would still be consistent with paragraphs 54 and 55 of NPPF. This would tie in with the Vision for the Service Villages, set out in the adopted Core Strategy which states:

*"By 2026 the Service Villages will become thriving rural communities and a focal point for local housing needs, services and community facilities...." [Our emphasis]*

### **Are there modifications that need to be made to make it more flexible and resilient?**

1.10 NLP proposes that the percentage split across the hierarchy should be amended so that 3% of the additional dwellings are directed to the Service Villages as opposed to WSM. This can be seen below:

Area	Current CS14	NSC Proposed CS14 / percentage of HR figure	NLP proposed distribution / percentage of HR figure
Weston super Mare	3,458 / 25%	6,459 / 31%	5,876 / 28%
Weston Villages	5,500 / 39%	6,500 / 31%	6,505 / 31%
Clevedon, Nailsea & Portishead	3,715 / 26%	4,976 / 24%	5,036 / 24%
Service Villages	805 / 6%	1,861 / 9%	2,518 / 12%
Other Settlements in Countryside	522 / 4%	1,189 / 5%	1,049 / 5%
Total	14,000	20,985	20,985

- 1.11 Increasing the proportion of dwellings directed to Service Villages will reduce the pressure on WSM and will allow smaller, sustainable settlements to grow to meet local needs.
- 1.12 For example, Congresbury is a service village. It is the 10<sup>th</sup> largest settlement within North Somerset and has the 5<sup>th</sup> highest level of self-containment.<sup>1</sup> Congresbury also fares well when compared to other villages within the Sustainability Hierarchy of Rural Settlements (Feb 2016). Congresbury is considered the 5<sup>th</sup> most sustainable settlement out of the 9 service villages and the 4 infill villages. The benefit of directing additional development to settlements such as Congresbury is that they are less constrained than higher order settlements such as WSM, Clevedon, Portishead and Nailsea which are limited in their ability to accommodate further additional growth owing to Green Belt, AONB and the Bristol Channel.
- 1.13 Congresbury has a wide range of services including a primary school, shops, doctors surgery, pharmacy, pubs and restaurants as well as recreational facilities. The level of services present in Congresbury is high and is comparable to larger settlements such as Long Ashton, Yatton and Easton in Gordano. NLP considers that Congresbury is an appropriate location to accommodate additional growth beyond the proposed allocations amounting to only 68 dwellings.
- 1.14 BDW Trading Ltd controls land at Brinsea Road, Congresbury. The site was the subject of an unsuccessful appeal<sup>2</sup> in November 2015. Nonetheless, NLP considers that the site is in principle an appropriate location to accommodate additional growth and that the reasons for the dismissal of the appeal are capable of being addressed through a revised development proposal comprising 51 dwellings.

<sup>1</sup> NSC Core Strategy Settlement Hierarchy and Functions Topic Paper

<sup>2</sup> Land off Brinsea Road, Congresbury Appeal: APP/D0121/W/15/3004788

## **In particular, should there be more flexible wording in respect of Policy CS32: Service Villages?**

- 1.15 NLP considers that in addition to the distribution of growth being amended (CS14) as set out above, Policy CS32 (Service Villages) should be amended to ensure that the policy is flexible and resilient enough to ensure that the Plan can meet the minimum housing requirement figure over the Plan period. NLP considers that Policy 32 (Service Villages) should be amended as follows:

*“...Proposals for small-scale residential development 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 will be supported.*

*Residential development will be permitted within, and adjacent to the settlement boundaries particularly where the proposal is sustainably located, meets an identified local housing need in respect of affordability or dwelling mix, does not generate a demand for local services on a scale that cannot be more, or supports the retention of existing services...”*

## **Does the increased housing requirement justify and modification to Policy CS6: Green Belt and/or Policy CS19: Strategic Gaps?**

- 1.16 It would appear that there is sufficient capacity to exceed the housing requirement figure without the need to seek amendments to Green Belt boundaries and/or proposed Strategic Gaps. However, the additional capacity is only capable of delivering numbers within the Plan period if emerging Policy CS14 is amended seeking a 3% increase in growth directed to Service Villages and emerging Policy CS32 is amended to provide for greater flexibility.

## **Is there any significant risk that the consequential changes to the policies would present any identifiable and unresolved conflict with any of the Core Strategy’s extant policies?**

- 1.17 As set out above, the consequential changes to the remitted policies, namely CS14 and CS32 as they stand are incapable of meeting the minimum housing requirement figure of 20,985 set out under adopted Policy CS13.
- 1.18 In order for the above identifiable conflict to be resolved, NLP consider that emerging Policy CS14 should be amended seeking a 3% increase in the growth directed to Service Villages and emerging Policy CS32 being amended to provide for greater flexibility.