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For and on behalf of  
**Taylor Wimpey**

**NORTH SOMERSET CORE STRATEGY EXAMINATION OF REMITTED POLICIES**

**HEARING STATEMENT: MATTER 3, POLICIES**

Prepared by  
Adrian Hunter BA Hons, BTP  
**DLP Planning Ltd**  
Bristol

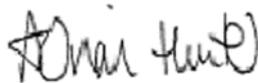
May 2016

Prepared by:



Annie Taylor  
Planner

Approved by:



Adrian Hunter  
Director

Date:

May 2016

**DLP Planning Ltd**  
5<sup>th</sup> Floor  
Broad Quay House  
Prince Street  
Bristol  
BS1 4DJ

T 01179 058850

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## **MATTER 3 – 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 To meet the housing supply, the Council is currently relying upon allocations from the emerging North Somerset Sites and Policies (NSSAP) which, due to the fact that this document is still at a relatively early stage in the process, should not be afforded significant weight. It is likely that until this Plan is sufficiently advanced and outstanding objections have been addressed, the delivery of new development across North Somerset will remain constrained. The Council should now be looking to develop flexible policies, which promote new opportunities for sustainable development.
- 1.2 The most appropriate way to resolve this is through the provision of strategic allocations within the Core Strategy. Furthermore, given that the NSSAP is not sufficiently advanced, and in order to make an allowance for non-implementation rates on the existing allocations which have been carried forward, without further allocation, the Council is unlikely to be able to demonstrate a five-year land supply.

**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: Policy CS32: Service Villages & Policy CS33: Infill villages, smaller settlements and countryside**

- 1.3 The Council are following an employment-led strategy (Policy CS20) and the role and function of settlements should allow for sufficient flexibility to ensure that these strategic needs can be met, whilst still being flexible enough to respond to the uncertainty and timescales of the emerging NSSAP.

### Service Villages

- 1.4 Development at the identified Service Villages is governed by Policy CS32, which supports small development, within the settlement boundaries, that is appropriate to the size and character of the village. Sites that are outside of the identified settlement boundaries are to be brought forward as an allocation in the NSSAP.
- 1.5 A number of these settlements are very well served by public transport to both Weston-super-Mare and Bristol. The village of Backwell, for example, has a main line train station with high-speed links, with both destinations being just over 10minutes away. These locations therefore play an important role within the District, yet are constrained by existing settlement boundaries, which are tightly drawn around the existing urban area. Settlements such as Backwell, represent ideal locations for new sustainable developments to be brought forward, and Policy CS32 should be amended to provide some flexibility to allow this.

### Infill Villages

- 1.6 Development at Infill Villages is strictly controlled (Policy CS33), this despite the fact that the Council's own assessments show that many of the Infill Villages are as sustainable as many of the Service Villages. These settlements often play a complementary roles in the overall settlement hierarchy and therefore offer further opportunities for sustainable development.

### Settlement boundaries

- 1.7 The Core Strategy makes no provision for the review of proposed settlement boundaries. These boundaries were prepared to provide for housing requirement in the 2011 Replacement Local Plan. These settlement boundaries were therefore never intended to accommodate the level of additional homes now envisaged. The Core Strategy offers the opportunity to revisit and review them for the next plan period. This will allow the Council to adequately plan for current and future housing needs, whilst allowing for flexibility for a range of sites in a mix of location to come forward.

- 1.8 Alternatively, the idea of settlement boundaries could be deleted and replaced with a policy that allows for development beyond these boundaries, subject to meeting that tests of sustainable development as set out in the NPPF.

Summary

- 1.9 Overall Policies CS32 and CS33 are not sufficiently flexible enough, they overly control development at sustainable locations, through restrictive settlement boundaries which fail to deliver the current housing requirement.

**Does the increased housing requirement justify any modification to: Policy CS6: Green Belt & Policy CS19: Strategic Gaps**

- 1.10 At this stage we consider that there is sufficient capacity to deliver the housing requirement without modifying the boundaries of Green Belts and Strategic Gaps, however is it likely that amendments to the Green Belt will be required in the next iteration of the Core Strategy, therefore it would be helpful if the plan should make reference to this.

**Is there any significant risk that the consequential changes to the policies would present any identifiable and unresolvable conflict with any of the Core Strategy's extant policies, having regard in particular to: The employment-led strategy of Policy CS20 (which is not before this Examination);**

- 1.11 The aim of Policy CS20 is to achieve a more sustainable link between jobs and housing, to increase the overall sustainability and self-containment of towns and villages within North Somerset whilst seeking to reduce out-commuting. This approach accords with paragraphs 34, 37 and 158 of the NPPF and the principle of which is generally supported.
- 1.12 In their proposed Main Modifications to Policy CS13 the Council put forward a housing requirement of 17,130. In the Inspector's Report into this Policy, paragraph 16 is relevant. It states:

*In March 2014 the Council argued that a housing requirement significantly greater than the 17,130 dwellings specified in the MM1 version of Policy CS13 could be*

*inconsistent with the employment-led approach which underlies the spatial strategy of the adopted part of the Core Strategy.*

- 1.13 The Core Strategy now includes a housing requirement for 20,985 dwellings, which is significantly greater than 17,130 dwellings. Despite the claim in March 2014 that a larger number would be inconsistent with the employment led approach the Council have continued with this policy. It is therefore unclear as to why the Council now consider that an increase number is consistent with the strategy established by Policy CS20. The consistency of the consequential changes with the employment-led strategy is therefore critical to the overall soundness of the CS.
- 1.14 A key role for the adopted CS will be to define the distribution of housing across the District, which will be then be implemented through the NSSAP. There is therefore an opportunity to ensure that the distribution of development, as required by the consequential changes makes provision for new development in sustainable locations, rather than simply relying upon the previous distribution, that could potentially constrain development. In response to the increased housing requirement, we consider that the overall strategy for meeting this target should be reviewed.
- 1.15 Work is progressing the on the preparation of a Joint Spatial Plan (JSP), with the current timetable being proposed for adoption in January 2018. Upon adoption, North Somerset are required to undertake a review of the CS. Until this point the CS will set out planning framework.
- 1.16 However is important that development in North Somerset is not seen in isolation. Development within North Somerset (along with South Gloucestershire and BANES) plays a key role in meeting Bristol's overall housing requirements. However due to boundary constraints, the housing needs of Bristol cannot be met within their administrative area and so these housing needs have to be meet by locations within North Somerset. This puts additional pressure for the provision of housing sites within North Somerset, and requires a flexible approach to ensure that the Council's employment led approach as set out in Policy CS13 can be achieved.

**What modifications to the consequential changes might be required?**

- 1.17 To provide for the identified housing requirement, there needs to be certainty of delivery and this can only be achieved by allocating sites or by introducing flexibility into Policy CS32 and CS33 to allow for development on sites adjacent to the settlement boundary, subject to meeting a set of criteria with regards to the overall scale of the proposed development and that development will support the overall function of the settlement.
- 1.18 A further option would be for the existing settlement boundaries to be either deleted or reviewed so as to provide a more appropriate boundary that allows for opportunities for sustainable development.

**BEDFORD**

4 Abbey Court  
Fraser Road  
Priory Business Park  
Bedford  
MK44 3WH

Tel: 01234 832 740  
Fax: 01234 831 266  
bedford@dlpconsultants.co.uk

**BRISTOL**

Broad Quay House (5th floor)  
Prince Street  
Bristol  
BS1 4DJ

Tel: 0117 905 8850  
bristol@dlpconsultants.co.uk

**CARDIFF**

Sophia House  
28 Cathedral Road  
Cardiff  
CF11 9LJ

Tel: 029 2064 6810  
cardiff@dlpconsultants.co.uk

**LEEDS**

Princes Exchange  
Princes Square  
Leeds  
LS1 4HY

Tel: 0113 280 5808  
leeds@dlpconsultants.co.uk

**LONDON**

The Green House  
41-42 Clerkenwell Green  
London  
EC1R 0DU

Tel: 020 3761 5390  
london@dlpconsultants.co.uk

**MILTON KEYNES**

Midsummer Court  
314 Midsummer Boulevard  
Milton Keynes  
MK9 2UB

Tel: 01908 440 015  
Fax: 01908 357 750  
miltonkeynes@dlpconsultants.co.uk

**NOTTINGHAM**

1 East Circus Street  
Nottingham  
NG1 5AF

Tel: 01158 966 620  
nottingham@dlpconsultants.co.uk

**SHEFFIELD / SPRU**

Ground Floor  
V1 Velocity Village  
Tenter Street  
Sheffield  
S1 4BY

Tel: 0114 228 9190  
Fax: 0114 272 1947  
sheffield@dlpconsultants.co.uk

**WILBRAHAM ASSOCIATES**

**RUGBY**

18a Regent Place  
Rugby  
Warwickshire  
CV21 2PN

Tel: 01788 562 233  
info@wilbrahamassociates.co.uk