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N-Somerset Site Allocations Plan Examination
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By recorded mail and email to: robert.young@n-somerset.gov.uk

Dear Sir or Madam,

**Land off Millcross, Clevedon (Policy SA1)
Sites and Policies Plan Part 2: Site Allocations Plan Examination**

We write in relation to the land off Millcross, which is a 1.17 hectare site in Clevedon that is currently subject to a draft allocation for residential development in the Site Allocation Plan document (draft **Policy SA1**, Schedule 1).

We (NHS Property Services ('NHSPS')) are the freehold owner of this site. The land was previously occupied by the Crabtree Retail Park, but it has been vacant for approximately seven years. The land was acquired by the NHS for the development of a community hospital. The hospital would have replaced the existing community hospital that would subsequently have been redeveloped for housing. However, that development has not come forward to date and North Somerset Clinical Commissioning Group ('CCG') is considering the future need for this vacant site.

We are currently investing in the existing hospital site and the CCG has confirmed that it is unlikely that the whole of the Millcross site will be required for healthcare development. A decision about the future requirement for this site for healthcare development will be made within the next two years, and any surplus land is therefore likely to be released for alternative development within the next five years (i.e. within the plan period).

We have engaged extensively with the local planning authority to promote this site and to secure a permissive site allocation. An allocation for residential purposes would provide certainty in relation to the site's redevelopment potential, it will encourage those involved to bring the land back in to active use, and it would enable us to secure best value from any future disposal.

In advance of the Examination in public hearing, we thought it would be helpful to place on record the intention once again for the site. We note with concern the comments made by St Modwen Properties (via its agent, GVA) in their written response ID: 3568545//2. The Inspector should note that the site will become available for development and that it meets the test set out in Footnote 12 of the NPPF that states:

“To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” [our emphasis]

The land at Millcross meets this definition in all regards.

As set out within Schedule 1 of the Council’s letter to the Inspector of 21 March 2017, the Council anticipates that this site will yield 35 units in 2019/20 and 35 units in 2020/21 (Hearing Document reference CD1a-Site-allocations-plan-schedule-1-with-additional-information). With the prospect of a decision being made by commissioners within the next two years, the Inspector can have confidence that at least part of the site is likely to be disposed of in a timely manner (with the benefit of planning permission) and that it could viably be developed for residential purposes in 2019/20 – 2020/21.

We are surprised that the St Modwen representation suggests that the site be deleted as an allocation and that any future housing supply from this site be treated as windfall. Such a remark appears to run contrary to the observation earlier in that same representation that there is, in fact, insufficient land allocated for residential use in Clevedon. We reject strongly the notion that the Council’s housing land supply position can be strengthened through the deletion of previously developed sites that are sustainably located and which have no physical impediments that would prevent their coming forward for development in the early years of the Plan period.

We also do not agree with the inference by St Modwen that the site could not accommodate up to 70 dwellings. Policy CS14 of the Core Strategy states that the target net densities across North Somerset is “40 dwellings per hectare, although this may be higher at highly accessible locations...” [our emphasis]. The Council’s sustainability appraisal concluded in respect of this site that it was “*Previously Developed Land with good accessibility*” and emerging Policy SA1 acknowledges that a mix of two-three storey development would be appropriate. Accordingly, an indicative figure of ‘up to 70 dwellings’ is not unrealistic at this stage, in accordance with the requirement of adopted **Policy DM 36** of the Development Management Policies document (2016) for residential development to “*optimise the potential*” of sites.

If you require any further information in relation to this site, please do not hesitate to contact mark.adams@property.nhs.uk.

Yours faithfully,



Mark Adams - Senior Town Planner (MRTPI)
NHS Property Services Ltd