
**North Somerset Sites and Policies Plan,
Part 2 Site Allocations Plan**

**North West Nailsea
Matter 2. Housing: Hearing Statement**

On behalf of Linden Limited (Linden Homes Strategic Land)

April 2017

**North Somerset Sites and Policies Plan,
Part 2 Site Allocations Plan**

**North West Nailsea
Hearing Statement**

Project Ref:	26130	26130	
Status:	Draft	Final	
Doc:			
Date:	19 th April	24 th April	
Prepared by:	Lauren Taljaard	Lauren Taljaard	
Checked by:	Simon Prescott	Simon Prescott	

Barton Willmore LLP
101 Victoria Street
Bristol
BS1 6PU

Tel: 0117 929 9677

Ref: 26130/A5/LT/CG

Email: lauren.taljaard@bartonwillmore.co.uk

Date: April 2017

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Barton Willmore on behalf of Linden Homes in respect of their interests at North West Nailsea. Policies SA1 and SA4 of the Pre-Submission Site Allocations Plan allocate the site for 450 dwellings and 1.5 ha of employment. Schedule 1 to policy SA1 identifies site specific details and issues for the allocation, which includes the requirement for a primary school on-site. The Council does not propose any post submission changes to policies SA1 and SA4 and their respective schedules for North West Nailsea.
- 1.2 Our representations on the pre-submission draft of the Site Allocations Plan (SAP) **supported** the allocation of land at North West Nailsea and provided evidence to show that the site is suitable and deliverable and that with mitigation, there are no technical reasons why the site should not be allocated. We **objected** to the requirement for a primary school on the site in the absence of evidence to demonstrate that it is needed.
- 1.3 The structure of the statement below reaffirms our position in response to the Inspector's questions 2.2(i): objections to allocated sites and 2.2(ii): delivery of allocated sites.

Matter 2: Housing – response to Inspector's questions

- 1.4 **Inspector's question 2.2 (i) Are there any sites which should be excluded from the list of sites identified in schedule 1 to the SAP and by the Council in the proposed further amendments of February 2017 (SD20) in order for the SAP to be sound?**
- 1.5 We have read the representations from other respondents to the pre-submission SAP and note that some have raised technical concerns about the allocation of land at North West Nailsea. They include responses from the Environment Agency, Natural England and Mactaggart and Mickel. Our response to their representations is set out below.
- 1.6 We are aware that the Environment Agency and Natural England have raised concerns about the impact of development at North West Nailsea on the Tickenham, Nailsea and Kenn Moors SSSI. Natural England state:

“As we understand it, this SSSI is being affected by hydrological and water quality impacts from Nailsea. Developing this site would have two potential issues. First it

may exacerbate the existing hydrological and water quality issues on the SSSI. Secondly, developing the site may preclude using some of this land for addressing the current hydrological and water quality issues. We hope that an accommodation could be reached such that the land could be developed, and both these issues addressed, it is not clear from the evidence supplied as part of this plan that both these issues could be addressed and the full quanta of 450 would render the plan sound”.

1.7 The Environment Agency raise similar concerns:

“Currently a significant volume of surface water from Nailsea discharges to the Tickenham Moor from a large pipe on the Causeway to the north west of Nailsea. The discharged water is contaminated with urban pollutants which have the potential to have a detrimental effect on the SSSI on the moor. If new development becomes acceptable, it would be environmentally beneficial for the surface water runoff from this side of Nailsea to be passed through some form of treatment prior to it discharging to the moor. The method by which it is treated would need to be decided in consultation with Natural England but could take the form of a settlement pond or reed bed, both of which are visually non-intrusive and could be incorporated into the design of the new residential areas prior to them being built”.

1.8 A detailed drainage strategy response to the Environment Agency and Natural England’s concerns is set out in appendix 3. In summary, our proposed surface water drainage strategy addresses these concerns, and overall would seek a betterment to the current hydrological and water quality issues arising from the site. The drainage strategy proposes appropriately sized surface water features to allow for the attenuation of surface water on-site. The focus will be on SuDS wherever practicable, especially soft engineered SuDS such as attenuation basins, ponds, swales, reed beds and bioaccumulation areas. These features will not only help with the management of the quantity of surface water run-off, but also water quality by helping to breakdown pollutants and nutrients in the run-off. The Environment Agency describe these very same features as potential solutions and the detailed drainage strategy would be worked up in consultation with the Environment Agency and Natural England to prevent any impacts on the SSSI. This is feasible and is not an insurmountable constraint to development.

1.9 Mactaggart and Mickel, who are promoting land elsewhere, state in their pre-submission representations that the SAP:

“fails to allocate land north of Youngwood Lane, Nailsea identified on the Plan at Annex 1 for residential development, and which is necessary to ensure that satisfactory provision is made to deliver the housing requirement for Nailsea in particular, and the overall requirements for the district during the plan period in general.

There are constraints affecting the principal allocation at North-West Nailsea, that has been identified as a residential development opportunity for more than 20 years. Moreover, its allocation ahead of the omission site is inconsistent with the sustainability appraisal, and contrary to the Flood Risk Sequential Test. The omission site has a similar capacity, is free from planning policy constraints of Green Belt and Strategic Gap, is not subject to flood risks or overhead pylons, and is the only urban extension site at Nailsea that has certainty of delivery at the present time. Moreover, other proposed new allocations at Nailsea are of uncertain availability, suitability and/or deliverability”.

- 1.10 In terms of flood risk, land at North West Nailsea is almost entirely within flood zone 1 and is therefore appropriate for all forms of development, including residential and would not need to pass the Sequential or Exceptions Test. Along the western boundary of the site allocation, there is a thin strip of land shown to be within flood zone 2 and flood zone 3. The EA Flood Map for Planning shows the part of the allocation within flood zone 3 to benefit from the presence of existing flood defences and therefore, flooding of this area would not ordinarily occur. Notwithstanding this, the concept plan in appendix 2 shows how vulnerable development (residential development) is directed to flood zone 1 with generous provision of public open space along the north western edge where the site is shown to contain a narrow strip of land in flood zone 2 and 3. This demonstrates that flood risk and drainage issues are not a constraint to the delivery of the proposed allocation and with appropriate design and mitigation, there are no technical reasons why the site should not be allocated.
- 1.11 We deal with Mactaggart and Mickel’s concerns in relation to the undergrounding of the pylons in our response to the Inspector’s question 2.2 (ii) on delivery in the next section below.

Key point 1:

Barton Willmore submitted detailed representations to the pre-submission SAP which examined the suitability of the site for development, providing information and initial strategies in relation to transport and accessibility, flood risk and drainage, and ecology. **This shows that there are no insurmountable constraints to the development of the site and no technical reasons why the site should not be allocated. Therefore, none of the concerns raised by others amount to substantive reasons why the allocation is not sound.** Land at North West Nailsea is well related to the town, with good access to existing services, facilities and public transport links. The site is suitable for development and with sensitive design and mitigation will make a significant positive contribution to the housing requirements of the town and to much needed housing in North Somerset.

- 1.12 **Inspector's question 2.2 (ii) Having regard to additional information supplied with examination document CD1 and appendices, how likely is it that the sites allocated in Schedule 1 and the proposed amendments will deliver the housing requirement of the CS within the plan period 2006 – 2026 at...**

c. Nailsea

- 1.13 Whilst we do not wish to comment on other allocated sites, firstly, we set out information below to demonstrate that the site at North West Nailsea is available and achievable for delivery over the plan period in response to the Inspector's question. Secondly, having looked at the representations to the pre-submission SAP, another developer has raised concerns about the delivery of North West Nailsea, and we comment below on potential availability constraints that can be overcome and for which there is a strategy and programme in place. This is in relation to the undergrounding of powerlines, and we also comment on the relocation of the Frith Way sports pitch as a potential constraint to delivery. Thirdly, we object to the requirement for a primary school on the site, in the absence of evidence on need. These points are addressed below.

Delivery of North West Nailsea

1.14 Land at North West Nailsea is allocated for 450 dwellings. Linden Homes submitted a pre-application inquiry in January 2017 and the Council has provided a helpful, practical response which states that planning permission is likely to be granted subject to the submission of relevant, supporting information. Linden Homes is currently working up a planning application to be submitted in the summer of 2017 for a first phase of 195 dwellings, with a view to securing planning permission by the end of 2017 / early 2018. A Reserved Matters application for this first phase will follow immediately after, with the aim of securing Reserved Matters consent by the end of 2018 / early 2019 and discharge of conditions by the middle of 2019, ready for implementation during the year 2019/2020, to tie in with the completion of the undergrounding of the powerlines.

1.15 Housing completion rates are anticipated as follows:

2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
		30	70	70	70	70	70	70

Undergrounding of powerlines

1.16 There is now consent for the rerouting and undergrounding of the powerlines which cross the proposed allocation, with a Development Consent Order for the Hinkley Point C Connection Project having been made on 19th January 2016. Works under the Development Consent Order will remove the existing overhead lines and underground/relocate them within the part of the allocation we are proposing as open space. The approved drawing from National Grid's application for a DCO is enclosed as Appendix 1.

1.17 The initial concept illustrative masterplan at Appendix 2 shows how the undergrounded line that will cross part of the proposal allocation could be accommodated within public open space and a landscape buffer.

1.18 Undergrounding of the power lines will take place in 2019 and pre-construction survey work has taken place on site during April 2017 demonstrating that works are proceeding on programme.

1.19 Construction of phase 1 (195 dwellings) will follow immediately after the undergrounding of the power lines, during the monitoring year of 2019/20.

Relocation of playing fields

- 1.20 Fryth Way sports pitch is located within the second phase of development and Linden Homes have a legal agreement in place to purchase an alternative site off Pound Lane in close proximity to the allocation, where the sports pitch and changing rooms can be relocated and so the location of the sports pitch on the site is not a constraint to delivery.

Requirement for a primary school on-site

- 1.21 Schedule 1 to policy SA1 states that a new primary school will need to be included as part of the development at North West Nailsea.
- 1.22 In the absence of any evidence suggesting that a primary school is required on-site, we raised an objection to the pre-submission draft of the Site Allocations Plan. Since then, EFM have undertaken research on education needs (see appendix 4) and conclude that during the construction of the development, Nailsea will have 157 spare primary school places available and therefore, as a consequence of the development of 450 dwellings, there would be a need for an additional 35 primary school places.
- 1.23 Para 204 of the NPPF and CIL Regulation 122 requires that planning obligations should only be sought where they meet all of the following tests:
- Necessary to make the development acceptable in planning terms
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 1.24 On this basis, and in the absence of a demonstrable need for a new primary school resulting from the development, the requirement for a new school on-site would not meet the tests of CIL Regulation 122 and is not necessary to make the development acceptable, nor is it directly related to the development nor fairly and reasonably related in scale and kind to the development. In terms of the soundness of the SAP, the requirement for a primary school is not justified and without changes, the Plan is not sound.

1.25 It is recognised that in due course, the Council may be able to demonstrate that additional provision is required, be it an extension, or extensions to existing provision or a new school and thus the right time to consider these details will be at the time an application is submitted.

1.26 Therefore, we seek changes to the wording in schedule 1 to policy SA1 as follows:

“The need for additional primary education capacity is to be considered, including the possibility of a new school on site, if required”.

Key point 2:

In respect of delivery, land at North West Nailsea is available and achievable for development over the plan period and there is consent and a programme in place for the undergrounding of the powerlines that cross the site. Construction of the first phase of the allocation is anticipated to start in 2019 immediately after the undergrounding of the powerlines.

Key point 3:

Evidence suggests that there is spare capacity within primary schools in Nailsea and the requirement for a new primary school at North West Nailsea is not justified, and is unsound. The need for extensions to existing schools or a new school on-site will need to be considered when an application is submitted and in order to ensure that the Plan is sound we seek changes to the wording of schedule 1 to this effect.

Conclusion

1.27 The initial concept illustrative masterplan at Appendix 2 shows how a first phase of the proposed allocation could be brought forward to deliver circa 195 homes together with public open space. The first phase would be accessed from The Causeway or Watery Lane.

1.28 The development of phase 1 could take place in step with National Grid’s work to re-locate the power lines as part of the Hinkley Point C Connection project, which is due to commence in 2019.

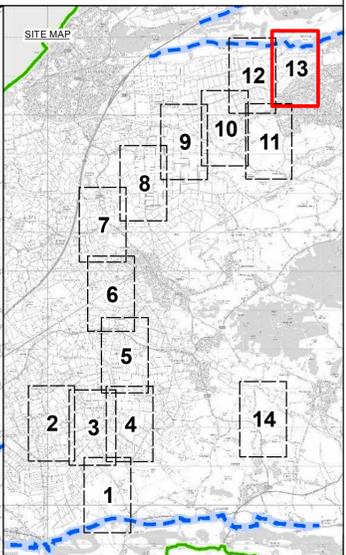
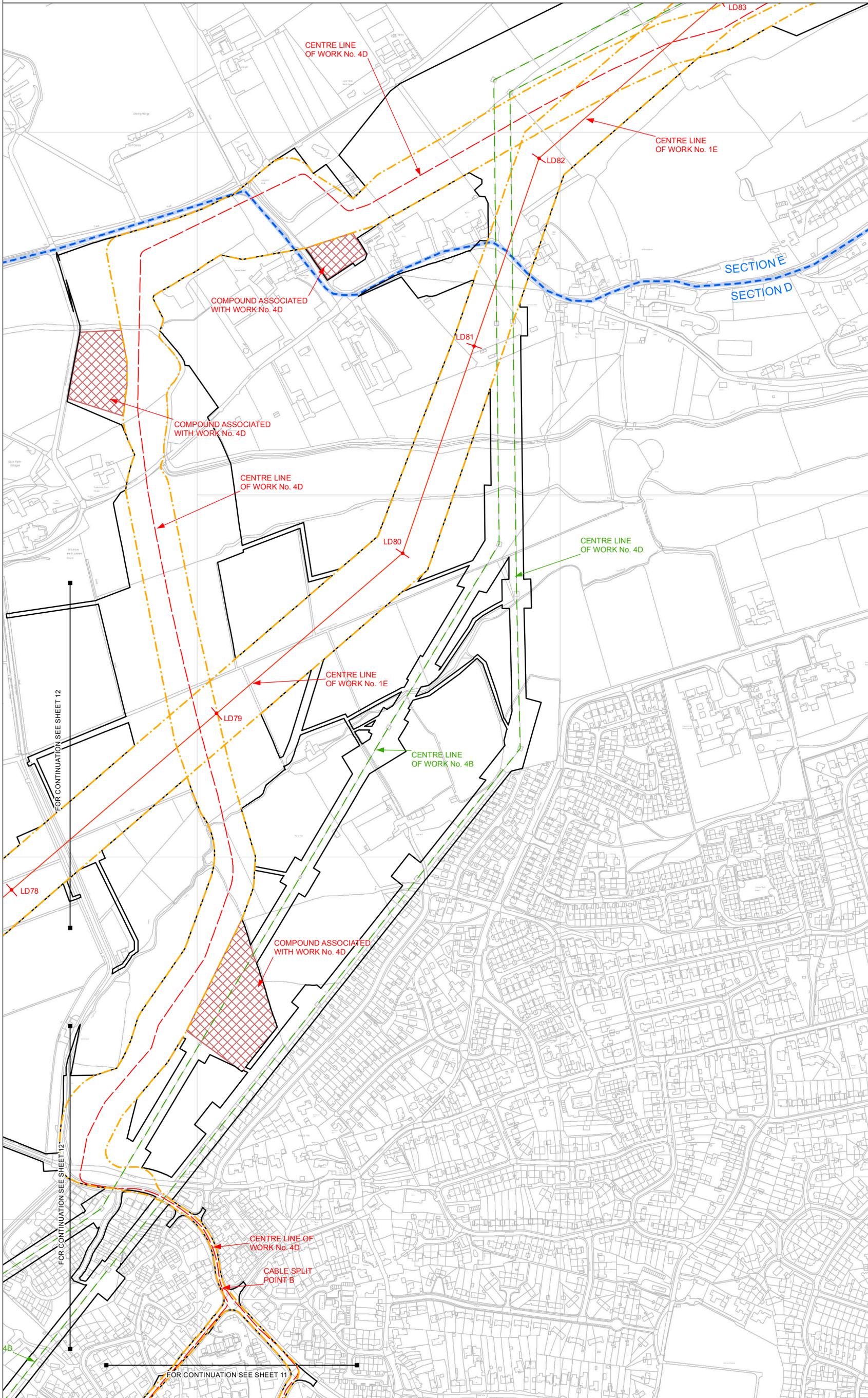
- 1.29 Linden Homes has assembled a consultant team and is working up a planning application for phase 1 (195 dwellings) for submission in the summer 2017.
- 1.30 Phase 1 is deliverable in the short term and the concept masterplan illustrates how it fits with the comprehensive development of the wider proposed allocation within the plan period.
- 1.31 We wholly support the allocation of land at North West Nailsea for 450 dwellings and our representations submitted to date demonstrate that the site is suitable, available and achievable over the plan period. There are no technical reasons why the site should not be allocated.
- 1.32 In the absence of evidence demonstrating need, we do object to the requirement for a school on site as it not justified and unsound, and seek the following change to schedule 1 to policy SA1:

“The need for additional primary education capacity is to be considered, including the possibility of a new school on site, if required”.

Appendix 1:

**National Grid Plan Showing Rerouting / Undergrounding
Power Lines**

NATIONAL GRID (HINKLEY POINT C CONNECTION PROJECT) ORDER
 WORKS PLANS
 (REGULATION 5(2)(j))
 SECTION D
 SHEET 13 OF 14
 NORTH SOMERSET COUNCIL



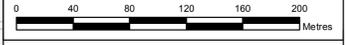
Key

- LATTICE PYLON (NEW)
- LATTICE PYLON (REMOVED)
- T PYLON
- WOOD POLES
- ORDER LIMITS
- LOCAL AUTHORITY BOUNDARY
- SECTION BOUNDARY
- COMMENCEMENT OF WORK
- TERMINATION OF WORK
- LIMIT OF DEVIATION
- LIMIT OF DEVIATION & ORDER LIMITS
- TEMPORARY OHL DIVERSION
- NEW UNDERGROUND CABLE
- NEW OVERHEAD LINE
- OVERHEAD LINE TO BE REMOVED
- SITE COMPOUND
- WORK

Notes
 This drawing is scaled at paper size A1, therefore any prints taken at smaller sizes will affect accuracy of the measurement units and should not be scaled against.

Coordinate System: British National Grid
 Units: Metre
 Projection: Transverse Mercator
 Datum: OSGB 1936
 Scale Factor: 0.9996

X Centroid Coordinate: 346330
 Y Centroid Coordinate: 171212



REPRODUCED FROM ORDNANCE SURVEY MAPS, BY PERMISSION OF THE ORDNANCE SURVEY ON BEHALF OF THE CONTROLLER OF HER MAJESTY'S STATIONARY OFFICE. © CROWN COPYRIGHT ORDNANCE SURVEY. OS LICENCE NO. 100048471

ISSUE	DATE	COMMENTS	DRAW	CHKD	APPD
C	MAY 2014	FOR DCO SUBMISSION	TC	LD	JB
B	MAY 2014	FOR DCO SUBMISSION	TC	LD	JB
A	AUG 2013	S42/S47 CONSULTATION	OA	JB	PB

Title
 NATIONAL GRID (HINKLEY POINT C CONNECTION PROJECT) ORDER
 WORKS PLANS
 (REGULATION 5(2)(j))
 SECTION D
 NORTH SOMERSET COUNCIL

NG INVESTMENT No. 20897	APPLICATION No. EN020001
NG DRAWING No. 13/NG/0069	DRAWING No. D/WP/PS/13
SHEET 13 OF 14	N/A
GIS A1	SCALE 1:2,500
	ISSUE C

Appendix 2:

Initial Illustrative Concept Plan



NOTES

© Keep 2016

This drawing has been produced for Linden Homes for the proposed development at Nailsea, North Somerset and is not intended for use by any other person or for any other purpose.

Responsibility is not accepted for errors made by others in scaling from this drawing.

All construction information should be taken from figured dimensions only.

All omissions and discrepancies to be reported to Keep immediately.



Key

- Site boundary phase 1
- - - Site boundary future phases
- - - Proposed 132kV cable route
- Proposed residential development phase 1
- Proposed residential development phase 2
- Proposed employment phase 2
- Nodes
- Frontages
- Existing trees and hedges
- Views to significant existing trees
- Proposed trees
- Pedestrian route
- - - Proposed Site Distributor Road
- Main access
- Secondary access
- Proposed Mews Road
- Proposed public open space
- Proposed SUDS ponds

General Issue KS SC 27/04/16 -

Notes DR CH Date Rev



Keep Architecture Limited,
 1.3 Temple Studios,
 Bristol, BS1 6QA
 t: 0117 325 0359
 e: info@keeparchitecture.co.uk
 w: keeparchitecture.co.uk
 twitter: @keeparchitect

Project

Nailsea

Drawing

Illustrative Masterplan

Drawing number

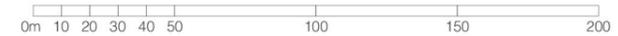
1277-P-001

Scale

1:2500 @ A3

Revision number

-



Appendix 3:

Drainage Strategy Response to Natural England and the Environment Agency

North West Nailsea

Drainage Strategy Response to Natural England and Environment Agency

20/04/2016

Memo

Vectos provided the written representation on flood risk and drainage in relation to the NW Nailsea allocation. This memo has been provided in response to comments received from Natural England (NE) and the Environment Agency (EA) with the allocation and the adjacent Tickenham, Nailsea and Kenn Moors Site of Special Scientific Interest (the SSSI).

The SSSI is located adjacent to the western boundary of the NW Nailsea allocation. The concept of the surface water drainage strategy for the proposed development of the site, as described in the written representations, is for the management of the quantity of the surface water runoff from the proposed development as well as for the quality of the runoff across the site and to receiving environments.

Background Understanding

Areas are designated as SSSIs to conserve their biological or geological interests, and are protected by law. Natural England can identify land or occupy areas as an SSSI – this is called being designated. The SSSI adjacent to NW Nailsea is a 129.4ha area located on the North Somerset Levels and it was designated a SSSI in 1995 for its biological value and significance (it is therefore a biological SSSI).

The soils in the area include clays of the Allerton and Wentloog Series and peat soils of the Sedgemoor and Godney Series. These are drained by a network of rhyes and field ditches, and support a rich plant and invertebrate fauna communities. It is understood that exceptional populations of Coleoptera (beetles and weevils) occur in the SSSI, with at least 12 nationally scarce species and 2 nationally rare species, including Britain's largest water beetle the Great Silver Water Beetle (*Hydrophilus piceus*).

In terms of the Great Silver Water Beetle, its favoured habitat in the UK is ditches with thick vegetation and marshy areas. The beetle is omnivorous but favours plant material in adult life. It can live for up to 3 years, with the adult female spinning a cocoon in Spring, which it fills with eggs and then sets afloat. The larvae feed on freshwater snails before then pupating in the mud, and therefore these characteristics are important to the habitat that the beetle thrives in. The surface water drainage strategy for the site would be informed by these favoured conditions of the Great Silver Water Beetle.

In 2014, an investigation into perceived water quality impacts on the SSSI was requested by Natural England. Water quality monitoring and interpretation completed by Penny Anderson Associates (PAA) in 2015 identified that diffuse pollution in the form of elevated nutrient inputs, mainly from agricultural sources, was a particular concern for the SSSI. The investigation identified a pattern that showed some parts of the SSSI to have nutrient 'hotspots'. Water quality is a particular concern for the SSSI. This is information of value for informing the approach to take with the surface water drainage strategy.

Comments from Natural England and Environment Agency

It is understood that concerns have been raised by Natural England and the Environment Agency with the potential for the proposed development of the NW Nailsea allocation on the SSSI. The concerns are with the potential hydrological and water quality impacts resulting from the proposed development.

Natural England comment that the development may exacerbate existing hydrological and water quality issues, and the associated impacts on the biological interests of the site. Although conceptual, the surface water drainage strategy proposed for the site would address this concern, and as detailed later, would seek an overall betterment to water quality from the site and to the availability of habitat suitable to Coleoptera and other flora and fauna. Natural England also raise a concern that developing the site may preclude using some of this land for addressing the current hydrological and water quality issues. Although the site is allocated, there is some potential to include within the drainage strategy areas of the site that offer general betterment to the current hydrological and water quality issues.

The Environment Agency comment that a significant volume of surface water from Nailsea discharges to the moor from a large pipe to the NW of Nailsea. It is understood that water discharging from Nailsea is already contaminated with urban pollutants, which have the potential to have a detrimental effect on the SSSI. The Environment Agency advise, that it would be environmentally beneficial for surface water runoff from this side of Nailsea to pass through some form of treatment prior to discharging to the moor. The method by which runoff is treated would need to be decided in consultation with Natural England, but they advise that it could take the form of a settlement pond or reed bed. These concepts and features are what the surface water drainage strategy has aimed to incorporate, with further details given below.

Surface Water Drainage – Water Quality Concepts

A written representation to the local plan on flood risk and drainage was submitted in April 2016, with this including a description and schematic of the surface water drainage concepts that the proposed development would strive to achieve. The written representation is included here as **Appendix A**.

In response to the comments received from Natural England and the Environment Agency in relation to water quality, and also with the background information provided in relation to the biological value and significance of the SSSI, additional detail on the surface water drainage concepts is presented below.

The written representation already confirms that surface water would be managed based on the principles of a Sustainable Drainage Strategy (SuDS) wherever practicable. Soft engineered SuDS is the preferred approach, including areas set aside for attenuation basins, ponds, swales, reed beds and bioaccumulation areas. SuDS would be incorporated into the site, to offset the impact of the proposed development (and the increase in impermeable surfaces) on surface water runoff rates and volumes.

Ground levels are lowest adjacent the western boundary and highest adjacent the eastern boundary. The ground levels in the south-western corner are lowest. The surface water drainage strategy would discharge to the Parish Brook and onto the SSSI in areas adjacent to these lower lying areas. These areas are therefore of high importance in terms of the surface water drainage strategy for managing both the water quantity and water quality from the site to the receiving environment, being the brook and moor.

As described in the written representations (**Appendix A**), appropriately sized features would be included in the surface water drainage strategy to allow for the attenuation of surface water, with these features incorporated at suitable locations in the masterplan. In addition to the management of the surface water runoff, SuDS features can provide water quality improvements and help prevent water quality impact on the receiving systems by reducing sediments and contaminants from runoff either through settlement or biological breakdown of pollutants. This can improve the quality of downstream water bodies and

associated environments. Additionally, the use of ditches and basins in the drainage strategy with areas of thick vegetation and marsh has the potential to provide additional habitat to help support the populations of Coleoptera (including the Great Silver Water Beetle) as noted with the SSSI.

For example, the use of attenuation basins set with different base levels would create some areas that were more permanently wet and other areas with more permanently dry conditions (together with transitional areas). These sorts of features reduce the sediment and pollutant load of runoff and thereby improve water quality, as well as offering an environment suited to Coleoptera. Additionally, the use of reed beds in the drainage strategy would not only offer a food source, but would also help breakdown pollutants and nutrients in the runoff. Given the results from PAA, the conversion of the site from an agricultural site to an urban area would also help reduce the nutrient loading from agricultural land.

The management of the water quality impacts from urban pollution would be a key consideration of the surface water drainage strategy. This would be mitigated through the use of a SuDS treatment train, which would include point source control for areas of particular risk (e.g. petrochemical interceptors from car park areas, reed beds) together with basins for settling out sediments in the surface water runoff, and different levels of control for water quality treatment throughout the surface water drainage strategy.

The aspiration of the surface water drainage strategy is to have a positive impact on flow rate and volume from the site, but equally and importantly given the biological importance of the SSSI, to have a positive impact on water quality in the SSSI and with also offering an additional habitat to rare and valued species.

Appendix 4:
Education Requirements

North Somerset Site Allocations DPD Examination

**Matter 2 – Proposed Site Allocations Plan
Policy SA 1**

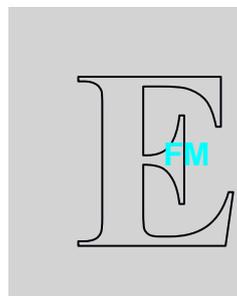
Land at North West Nailsea

Education Issues Report

for

Linden Homes Strategic Land

Jan Kinsman



1. Introduction and Proposed Change to Wording

- 1.1 EFM is appointed by Linden Homes Strategic Land (Linden Homes) to advise on education matters arising from North Somerset Local Plan proposals, in particular relating to the Sites and Policies Plan, Part 2, Site Allocations Plan, Publication Version October 2016 and the allocation of Land at North West Nailsea.
- 1.2 EFM was established in 1990, and is an education consultancy that advises schools, local authorities, central government departments, developers and landowners. It is also responsible for the premises management of schools and other properties. EFM is currently advising clients on education and other population impacts and appropriate mitigation measures for a wide range of housing and mixed use development proposals, from a few dwellings to major new schemes of 5,000 dwellings and more.
- 1.3 Proposed Policy SA 1 to the Site Allocations Plan (SAP) states, *“Residential sites of 10 or more units are shown on the Policies Map and set out at Schedule 1 together with any specific site-related requirements or key considerations to take into account.”*
- 1.4 Starting on page 47 of the document, Schedule 1 identifies seven sites in Nailsea totalling 815 dwellings. Linden Homes has an interest in the site identified as Land at North West Nailsea. The allocation is for 450 dwellings, the largest of the allocations, and a number of “Site specific details / notes” are prescribed including *“New Primary School to be included as part of development”* (page 49).
- 1.5 It is considered that the wording in relation to a new school is inappropriate and should be deleted, or deleted and replaced by wording along the following lines: ***“The need for additional primary education capacity is to be considered, including the possibility of a new school on site if required”***

2 Education Considerations - Land at North West Nailsea

- 2.1 Housing is built to meet housing needs, and building housing does not in itself increase the number of children. However, it does provide the opportunity for families to live in different locations, and where a considerable amount of new housing is developed there may be additional demand for school places that cannot be met by existing provision.
- 2.2 Linden Homes has sought pre-application advice from the Council about its requirements. The response (pre-CIL) confirmed the Council would be seeking education contributions and a 2.4ha site for a new primary school. The suggested school site area would be ample to provide for a two form entry, 420 place, primary school – indeed it is in excess of the 2.0ha maximum total

site area recommended by the DfE in Building Bulletin 103 for a two form entry school, and also above the minimum total site area recommended for a three form entry (630 place) primary school, which is 2.3ha.

- 2.3 The Council's methodology for calculating contributions indicates the development could lead to a peak demand for 192 primary school places. This figure is based on the site being fully developed in a two year period which is unrealistic, and a longer build period would reduce the peak figure. At the point of determination the Council would take into account the availability of capacity in nearby schools and reduce the contribution sought accordingly. The table below shows the information on spare capacity provided by the Council in its North West Nailsea pre-application response of 23 March 2017.

The expected admission levels are based on the 2016-2020 projections:

Nailsea Group	School Places					Projected demand					Predicted empty places (negative values = shortfall)				
	2016	2017	2018	2019	2020	2016	2017	2018	2019	2020	2016	2017	2018	2019	2020
Golden Valley Primary	420	420	420	420	420	410	404	396	379	365	10	16	24	41	55
Grove Junior	285	255	255	240	240	246	226	228	213	215	39	29	27	27	25
Hannah More Infant	180	180	180	180	180	161	163	157	153	149	19	17	23	27	31
Kingshill Church School	210	210	210	210	210	127	117	112	108	106	83	93	98	102	104
	1095	1065	1065	1050	1050	944	910	893	853	835	151	155	172	197	215
	Number of places required to allow for 5% surplus										55	53	53	53	53
	Number of surplus places available after 5% surplus allowed for										96	102	119	145	163
	Number of places allocated to other developments										1	3	4	4	6
	Number of surplus places										95	99	115	141	157

- 2.4 The table shows 157 places available, which would reduce the number of places required as a consequence of the development to 35 places.
- 2.5 In principle, requirements for contributions towards a new school and/or provision of a site for a new school from a development of 450 new homes are not necessarily inappropriate. However, on the basis of the information above it is clear that a requirement for a school site would not be reasonable in terms of meeting the legal requirements of CIL Regulation 122 at the present time.
- 2.6 Even if there were no surplus places, and a school site could be justified, the size of site that could be required would be limited to one form of entry, which would require a site in the range 0.9ha to 1.1ha.
- 2.7 Furthermore, consideration should be given to other options, including expansion of existing schools.
- 2.8 Kingshill Church School in Pound Lane (BS48 2NP) had 134 pupils on roll in January 2016 - and capacity for 210. This is the closest school to the site, and appears to sit alongside other education provision including Ravenswood School, which is special school. The table above demonstrates that this school is expected to have a considerable and increasing amount of spare capacity in the foreseeable future.

3 The Site Allocations Plan

- 3.1 The Council has not provided any supporting evidence, in the local plan evidence base or elsewhere, to explain the need for the school or to justify its proposed location. Such evidence might include pupil forecasts, a geographically based analysis of potential demand and school places that could demonstrate the travel implications of alternative locations, and other factors.
- 3.2 Alternatives to a new school should also be considered, although it is currently unclear to what extent any other options have been considered. The table above is incomplete when considering the wider Nailsea area, as other schools are within the two mile radius considered by the Council. It is generally considered that two form entry schools are more efficient and more financially viable.
- 3.3 It would therefore be appropriate to consider expanding existing schools including, St Francis Catholic Primary School and Wraxall Church of England Voluntary Aided Primary School. The first two are one form entry schools, while Wraxall is a half form entry school. That Kingshill Church School sits alongside other education facilities suggests there may be scope for more innovative solutions than simply building a new school, if additional capacity is required.
- 3.4 In the circumstances, the case for an additional school as part of one particular allocation has not been demonstrated and, if the need can be demonstrated, other options (including expanding Kingshill Church School) should be considered.
- 3.5 It is recognised that in due course, the Council may be able to make a case for additional provision - be it an extension, or extensions, to existing provision or new school. There is scope for considering details as and when development applications are submitted.
- 3.6 It is therefore suggested that the current wording in schedule 1 to policy SA1 is inappropriate and should be deleted. It could be appropriate to draw attention to the need for consideration of education matters with wording such as, *"The need for additional primary education capacity is to be considered, including the possibility of a new school on site if required"*.

4 Conclusions

- 4.1 In the context of the Site Allocations Plan there may be a need for additional primary education provision to support housing growth in Nailsea. However, the Council has not demonstrated that there is a need a new school, and there is no evidence that alternative options have been considered.

- 4.2 The wording in relation to a new school for the Land at North West Nailsea allocation in Schedule 1 is inappropriate. It should be deleted, or deleted and replaced by wording that along the following lines: *“The need for additional primary education capacity is to be considered, including the possibility of a new school on site if required”*. Such wording should also be considered in relation to other sites that are considered large enough to support a school site of approximately 1ha.