



An **APLEONA** company

Report

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North Somerset Site Allocations Examination

Statement on behalf of St Modwen

Matter 5 Strategic Gaps

April 2017



Contents

1. Introduction & Context
2. Response to Inspector Questions

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For and on behalf of GVA Grimley Limited

1. Introduction & Context

1.1 This statement seeks to build upon the detailed representations submitted by GVA on behalf of St Modwen Developments Ltd in relation to their land interests within North Somerset which include amongst other sites:

- 'land west of Kenn Road', on the edge of Clevedon;
- Locking Parklands (former RAF Locking); and
- 'land west of Locking Parklands' (formerly 'Moss Land').

1.2 **This statement should be read in conjunction with our previous representations dated 28 April 2016 submitted in response to the consultation draft (March 2016) version of the Plan and 19th December 2016 submitted in response to the Publication draft version of the Plan (October 2016).** In summary we are wholly unconvinced that our previous submissions have been robustly assessed and considered. We have reviewed the Council's latest evidence for the Examination and in our opinion the documents do not provide a sound, fully tested and considered evidence base to justify the approach of the Plan. Our concerns focus on the proposed **Strategic Gap (SG) between Locking Parklands/land West of Locking Parklands (former Moss land) and Locking Village.**

2. Response to Inspector Questions

2.1 We deal with each of the Inspector's question in turn and make comments where considered appropriate. On the basis of our concerns focusing on the Strategic Gap at Locking we do not wish to provide comments on the Local Green Space designations.

Q 5.1 Do the sites allocated for Local Green Space comply with the criteria in paras 76 and 77 of the NPPF?

2.2 No comment.

Q 5.2 Has the Council been consistent in its approach to the designation of LGS? Are there other sites which meet the criteria which should be included in the Plan?

2.3 No comment

Q 5.3 Is Policy SA8 relating to undesignated green space justified?

2.4 No comment

Q 5.4 Has the identification of Strategic Gaps (SG) been the subject of SA? Have the proposed boundaries been tested? How would the SG perform in terms of tests for sustainability?

2.5 We have highlighted below (Q5.5 ii) significant concerns with regards to the testing of the boundaries of the SG along the A371 corridor between Locking Village and Locking Parklands and Land West of Locking Parklands. Furthermore we also detail concerns regarding the impacts of the SG in this location (north of the A371) with regards to the delivery of the Weston Villages. Within our previous statements (See Matter 2 Housing) we have flagged concerns regarding the ability of the Weston Villages to deliver the required housing numbers within the settlement boundary as currently defined. We also note that elements of infrastructure will be required outside of the defined settlement boundary and the SG could preclude this from coming forward. For example in the location in question the Locking Parklands and West of Parklands developments already require drainage, highways and possibly future education requirements on the southern edge of the developments.

Q 5.5 Do the SG listed at para 4.52 of the SAP, and shown on the Policies Map deliver CS Policy CS19?

i Has the Council considered whether SG should be included around service and infill villages?

2.6 No comment

ii Are the SG between Locking and Weston s Mare, and Nailsea and Backwell justified?

2.7 There is no justification for the **SG between Locking Parklands, the land to the West of Locking Parklands (former Moss land) and Locking Village to the north of the A371** as explained within our representations. The SG is unduly restrictive and has been designated on an arbitrary basis using the existing settlement boundary (which we question below) rather than a fully evidenced and considered approach including an assessment of alternative options. We also note it adds yet another layer of policy over and above the Weston Villages SPD which includes a 'green infrastructure and setting' designation which doesn't match up with the proposed SG.

2.8 We also have concerns regarding the intentions and practical implementation of policy SA9 in this location. The SAP notes (paragraph 4.47) that the SG's are required because '*reliance on countryside policies alone are unlikely to provide sufficient protection..*'. We would therefore suggest that the countryside policies require a review rather than seeking to add another unnecessary layer of protection through blanket designations. Reference is also made (paragraph 4.48) to possible exceptions which may meet existing policies and the scope for development between settlements being allowed on appeal. This is a rather speculative statement and is not a sound reason for making a blanket SG designation if a proposal is found to be sound in planning terms against the wider policies of the plan. These we would argue, include the identification of the Weston Villages as a focused area for growth and regeneration, noting also the context in terms of the review of the Core Strategy housing target. The wording of Policy

SA9 is also rather ambiguous with no definition of the scale of 'harm' which makes it impractical to implement.

- 2.9 The SAP (paragraph 4.50) notes that the SG is expected to have '*broadly similar functions to the Green Belt, but with important differences, notably they operate on a much more localised focused scale*'. Reference is then made to NPPF paragraph 80 in terms of Green Belt policy. However we would suggest that Green Belt designations are clearly intended to operate on a localised scale and are implemented in such a manner elsewhere in North Somerset and across the country. The introduction of a SG if to be treated, as the Council is implying, as a 'localised' Green Belt policy cannot therefore be taken lightly. Any form of Green Belt review requires significant and robust evidence and consideration of alternatives. The Council has not undertaken this with regards to the SG in this location or elsewhere and therefore we would suggest the approach is not sound. Fundamentally, we would also question the planning merits of such a two tiered approach citing for example the move away from including Special Landscape Area designations in Local Plans.
- 2.10 Furthermore, as flagged within our statement to Matter 2 we have concerns with the ability of the Weston Villages as defined by the current settlement boundary to deliver the scale of development that the Plan is expecting to come forward. Therefore there will be requirements (as has been the case for the Parklands Village development planning consents to date) to extend development outside of the defined settlement boundary. During discussions with the Council's Planning Policy and Development Control teams in consideration of the applications submitted by St Modwen it has been increasingly apparent that the settlement boundaries were originally defined (through the Core Strategy and Weston Villages SPD) on very high level basis with no detailed consideration to the position on the ground. Therefore they are not a sound basis upon which to work from to determine the extent of the SG. The ad hoc nature of the SG designation is further evidenced by the additional SG designation in February 2017 in document SD20 to the west of Locking village without any further supporting evidence.
- 2.11 We have previously suggested that the existing landscape (north and south of the A371) and the A371 itself provide the buffer between Locking Parklands and Locking Village desired by the Council. There are also ecological requirements in terms of bat corridors that are required along the southern edge of Locking Parklands and the former Moss land, and the front of Locking Parklands includes significant areas of woodland which are protected by TPOs. The SG is an unnecessary and unjustified addition in this location and has not been assessed in sufficient detail with regards to the reality of the developments on the ground or nature in which the settlement boundaries were originally defined. Therefore, given the existing and proposed built form, the A371, the narrow nature of this strip of SG and the lack of distinct setting and character of Locking Village in this location (along the A371) we would suggest that the SG should be removed to the north of the A371. The retention of the SG to the south of the A371 will still therefore retain the gap

that is desired in order to prevent coalescence and the retain the landscape setting of Locking Village as noted in Policy CS19 objectives.

iii Would it be necessary to amend the SG between Yatton and Congresbury if the need for a development of a medical centre within the SG was demonstrated?

2.12 No comment