



Representations in relation to:

**NORTH SOMERSET SITE ALLOCATIONS PLAN CONSULTATION DRAFT
(MARCH 2016)**

Prepared by:

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on behalf of Land Value Alliances

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NORTH SOMERSET SITE ALLOCATIONS PLAN CONSULTATION DRAFT (MARCH 2016)

1. Introduction

- 1.1 This representation has been prepared by Ian Jewson Planning Ltd on behalf of Land Value Alliances (LVA) and relates to the Consultation Draft of North Somerset Council's (NSC's) Site Allocations Plan (SAP). The representation comments on both the general approach of the document and specifically to Site Allocations at Nailsea. Reference is also made to land North of Nailsea which is controlled by LVA and has previously been promoted for mixed use development during earlier stages of North Somerset Council's (NSC's) consultation process.
- 1.2 The representation will demonstrate that the Consultation Draft of the Site Allocations Plan is premature as it is based upon the LPA's proposed changes to the remitted policies of the Core Strategy. These changes have not yet been through examination and are subject to a significant level of objection, primarily on the basis that they are not 'justified', one of the four tests of soundness set out in the National Planning Policy Framework (NPPF).

2. Prematurity

- 2.1 Page 9 of the Consultation Draft SAP sets out the latest position in respect of the Core Strategy which is said to provide the context for preparing the Site Allocations Plan. The key points being:
- The Core Strategy was adopted in April 2012. Policy CS13 (Scale of New Housing) set a housing requirement of 14,000 dwellings for the period 2006 and 2026. However, following a legal challenge by the University of Bristol the policy was remitted back to the Planning

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Inspectorate for re-examination. Following the re-examination and an intervention by the Secretary of State the housing requirement for the plan period was increased to 20,985 dwellings in September 2015.

- The increase to the housing requirement has implications for eight other policies in the Core Strategy. These policies were also remitted back to the Planning Inspectorate for re-examination. The policies are:
 - Policy CS14 (Distribution of New Housing)
 - Policy CS6 (Green Belt)
 - Policy CS19 (Strategic Gaps)
 - Policy CS28 (Weston-super-Mare)
 - Policy CS30 (Weston Villages)
 - Policy CS31 (Clevedon, Nailsea and Portishead)
 - Policy CS32 (Service Villages)
 - Policy CS33 (Infill Villages, Smaller Settlements and Countryside)
- NSC consulted on their proposed modifications to the above policies between 6th November and 18th December 2015. The LPA have forwarded the responses to the Planning Inspectorate who have appointed an Inspector to examine them.

2.2 NSC then describe the relationship between the Core Strategy and the Site Allocations Plan and advises that:

- Taking into account completions and existing commitments, the Site Allocations Plan only needs to identify sites for 1,715 dwellings in order to ensure that the housing requirement of 20,985 dwellings is achieved.

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- The Site Allocations Plan has been prepared in accordance with the LPA's proposed changes to the remitted policies.

2.3 It is premature for NSC to prepare a Site Allocations Plan that is based on the above assumptions. There have been significant objections to the LPA's proposed changes to the remitted policies of the Core Strategy and they have not yet been subject to examination. The key objections include:

- The proposed increases to the dwelling requirements for the various settlements have not been justified.
- It is not considered that NSC's evidence on future housing delivery is properly justified. For example, the consultation document for the remitted policies advises that 589 dwellings will be delivered on 'Other Identified Sites', However, no information has been provided on the location or deliverability of these sites (simply that they are brownfield).
- The consultation document for the remitted policies does not assess whether the Council's employment-led approach to development (1.5 jobs per dwelling) in Weston-super-Mare and the Weston Villages remains achievable when taking into account the increased housing numbers.
- It is not considered that NSC has properly explored or tested whether or not it will be necessary to release land from the Green Belt to help meet the increase housing requirement.
- It is not considered that NSC has properly considered the ability for Nailsea to accommodate future housing and employment growth to help meet the increase housing requirement.
- NSC has not considered any alternative distribution scenarios.

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- There has not been a Sustainability Appraisal of the proposed changes to the remitted policies.

2.4 These concerns are shared by the Inspector that has been appointed for the examination on the Core Strategy remitted policies, as evidenced by both his letter to NSC on 24th February 2016 (**Appendix 1**) and his choice of matters to be discussed at the examination in June (**Appendix 2**). It is considered likely that the proposed changes will be either found unsound or require significant further amendments. On this basis work on the Site Allocations Plan should be halted until the remitted policies have been adopted and the distribution strategy for new housing has been finalised.

3 The Green Belt surrounding Nailsea

- 3.1 The ability for Green Belt boundaries to be reviewed is set out at Paragraphs 83 and 84 of the NPPF. Clearly the need for such a review will need to be considered as part of the ongoing examination into the remitted policies. Until this process has been completed the SAP should not assume that the housing requirement can be met without amendments to the Green Belt. It is noted at page 2 of the SAP that the Core Strategy objective of continuing *'to support North Somerset's existing Green Belt'* has influenced the SAP. However, this approach will adversely restrict the scope of the document and may not reflect the outcome of the remitted policies examination later this year.
- 3.2 To understand the relevant evidence in relation to the Green Belt in North Somerset a review of the Joint Spatial Plan Green Belt Assessment has been undertaken by The Environmental Dimensions Partnership (EDP) on behalf of LVA and the findings are contained at Section 2 of the detailed Green Belt Review attached to these representations (**Appendix 3**). The EDP report was initially prepared in relation to the emerging West of England Joint Spatial Plan consultation (November 2015) and the Green Belt Review that supported

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it. However, the issues identified by EDP in their report are also relevant to the SAP. It is understood that the Joint Spatial Plan Green Belt Review document is the most up to date evidence relied upon by North Somerset Council although it only provides an initial strategic assessment of the Green Belt across the West of England plan area. Paragraph 2.13 of the EDP report confirms that:

'The Assessment provides only a very high level description of the cell and the extent to which it serves each of the purposes and there is no specific reference to it in the Conclusion section. The only reference to the function of each cell is they "directly serves two or more of the five purposes defined in the NPPF".'

Whilst these 'tests' are entirely representative of the purposes of the Green Belt as set out in the NPPF, this very simplified methodology and weighting system makes the Assessment less flexible and subtle when applied to smaller land parcels. It does not, for example, allow for a more detailed analysis of the extent to which the cells contribute to each of the purposes and what makes one cell any better or worse at serving each of the purposes. This is relevant particularly for making recommendations for re-drawing the boundaries – that is, the subsequent stage which is currently unavailable to inform the options consultation.

Whilst this simplification is in some way addressed through the consideration of all areas in the subsequent review provided in Appendix 1 of it, as stated above, the nature in which the cells were seemingly identified from a very large land area appears somewhat cursory.'

3.3 In support of proposals to develop land North of Nailsea, detailed cell analysis is provided in EDP's report which applies additional criteria in line

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with a more detailed, site-specific study against the cells defined in the JSP Assessment. This supports the proposition that the Green Belt around Nailsea should be amended.

4 Proposed Site Allocations in Nailsea

- 4.1 The SAP proposes development at Nailsea on a combination of allocations carried over from the Replacement Local Plan as well as new allocations outside the settlement boundary. As set out above it is concerning that the SAP is seeking to set the overall level of growth for Nailsea in advance of the examination into the remitted policies. Setting this matter aside concern is also raised regarding the deliverability of the proposed sites. In particular land to the North West of Nailsea is known to be significantly constrained by the overhead pylons which render the development of the site unviable. It is therefore necessary for other available sites to be considered.
- 4.2 It is not clear from the SAP how potential new allocations have been identified although it is assumed that the Housing and Economic Availability Assessment (2014) is NSC's principle source of information. The Council's data relating to potential sites was updated as part of a call for sites in March 2015 although it would appear that this information has not informed the SPA. In particular land North of Nailsea was submitted as part of the March 2015 Call for Sites but was not assessed by the Council in the '*Appendix 1 Residential Site Assessments*' evidence base document.
- 4.3 Land to the North of Nailsea is also identified for Strategic Open Space (North of Greenfield Crescent and Woodland Road) but no justification for this provision is provided other than by reference to it being carried over from the Replacement Local Plan (2007). The proposed Strategic Open Space in this location should therefore be deleted. Opportunities for open space provision can however be provided to support the identification of the site as a strategic mixed use allocation.

5 Land North of Nailsea

- 5.1 As set out above we recommend that work on the Site Allocations Plan should be halted until the remitted policies have been adopted and the distribution strategy for new housing has been finalised and it is clear as to the exact level of development that should be delivered by each tier of the settlement hierarchy. At that point we recommend that Land North of Nailsea is allocated for mixed use development as identified in red on the plan attached at **Appendix 4**.
- 5.2 This site represents the optimal location for an extension to the town. Indeed such an approach was supported through the emerging North Somerset Council Core Strategy process by Nailsea Town Council. However, this local aspiration was not carried through to the adopted Core Strategy as NSC did not consider that releasing land from the Green Belt was necessary in order to achieve the original housing requirement of 14,000 dwellings across the plan period. Since that time the housing requirement for North Somerset Council has increased to 20,985 following re-examination of remitted Policy CS13 and the JSP has also commenced. It is therefore logical that this matter should now be reconsidered.
- 5.3 The Town Council's stance in relation to this matter has been previously confirmed in relation to representations submitted to NSC's further consultation of the remaining remitted Core Strategy policies including Policy CS6 (Green Belt). The Town Council's representations dated 14th December 2015 state:

'Nailsea Town Council reiterates its existing policy as follows:

1. *To support a realignment of the green belt boundary to support employment development at the north east side of the town.*

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2. *To extend the area already proposed to be removed from the green belt on the north east of the town to utilise this land for leisure and residential development as well as employment.*
3. *To ensure that infrastructure is not a constraint, to support the construction of an access road from the Bristol Road to the Clevedon Road to the north of the town.*
4. *To support in principle the development of employment and leisure facilities on land beyond the settlement boundary at North West Nailsea, including that in the green belt.*
5. *That any change to the settlement boundary can only be considered if the area between Nailsea and Backwell described below is incorporated into the green belt:*
 - *to the north, Bucklands End, the southern side of The Perrings, the Bridleway from the junction of The Perrings and Youngwood Lane and across Morgan's Hill (footpath N4)*
 - *the railway line to the south*
 - *Station Road to the east (the current western boundary of the green belt)*
 - *Netherton Wood Lane/Chelvey Lane to the west'*

5.4. We understand that the Town Council's support for development in this location remains unchanged and that similar support has been expressed for a mixed use allocation of land North of Nailsea in relation to this latest consultation.

5.5. The NPPF recognises that Green Belt boundaries can be altered '*through the preparation or review of the Local Plan.*' The potential for land currently within the Green Belt to assist in meeting future housing requirements must be

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properly considered as part of the SAP process if the document is to be found sound.

5.6. As discussed above LVA has commissioned a review of the recent West of England Green Belt Assessment (which comprises defined cells within a study area) and has extended this work to consider in more detail the Green Belt surrounding Nailsea. A copy of this review is attached at **Appendix 3**.

5.7. In summary the findings relating to land in the Green Belt, were:

- Land south-east of Nailsea performs only a partial function in fully addressing three of the five Green Belt tests, notably that it does not prevent merging between Nailsea and Backwell;
- Land north of Nailsea, part of which contains the LVA site, provides a limited contribution to the purpose of preventing encroachment from the adjacent settlement edge, this being primarily due to the influence of the adjacent Southfield Road Trading Estate and overhead pylons;
- Land to the east of Nailsea serves a limited function in preventing merging between Nailsea and Backwell;
- Proposed amendments to the Green Belt boundary (and to internal boundaries between the WOE assessment cells) for these areas will ensure the resulting land performs more fully against all purposes of the Green Belt and in so doing, reinforce openness and permanence.

5.8. Whilst the Council's position in relation to the release of Green Belt land immediately to the south of Bristol is well documented we consider that land within the Green Belt to the north of Nailsea should be given further consideration. There is no compelling need to retain this land as Green Belt or keep it permanently open. Development of the site would also be consistent with promoting sustainable patterns of development. Importantly the release of the Green Belt in this location would not set a precedent for

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further development as there is an obvious natural boundary further north where the land falls away down to the lower lying land and the river. This would create a long term defensible green belt boundary. The potential also exists to reallocate the green belt to the south in order to protect the more sensitive strategic gap between Backwell and Nailsea.

- 5.9. A mixed use development in this location comprising residential, employment, community uses and sports/leisure facilities would assist in meeting the need for housing locally whilst helping to improve self-containment. Indeed development in this location could provide a catalyst for future regeneration by addressing Nailsea's dormitory status, the ageing population, the lack of suitable housing mix and assist in creating new local job opportunities.
- 5.10. Importantly the site has good access to the wider road network and also has the potential to deliver a much needed northern bypass road which would reduce congestion locally and provide a more suitable access for the existing and proposed employment areas.
- 5.11. The town of Nailsea was identified as a sustainable settlement suitable to accommodate further residential development when the Core Strategy was originally adopted. Logically the level of this growth will need to increase once the latest District housing requirement is applied. Remitted Policy CS31 of the North Somerset Core Strategy acknowledges that greenfield extensions to Nailsea may be acceptable in principle but stipulates that development should not be located in the Green Belt. However, in light of the significant increase in the housing requirement we consider that this approach should be reconsidered to include possible Green Belt release to the North of Nailsea particularly as this was previously supported by the Town Council.

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- 5.12. LVA has commissioned a Concept Plan of the potential development area. This work will require further refinement in due course although as currently illustrated we consider that the site could provide a sustainable mixed use development of around 600 dwellings and 2 hectares of employment land along with strategic green buffers and significant areas of community open space. The site lies adjacent to an area of existing employment providing potential regeneration opportunities. It is also well located to the Town Centre and other facilities including local schools.
- 5.13. On this basis we strongly encourage the LPA to allocate the site for residential development in the Site Allocations Plan. The site constitutes a suitable and available sustainable housing development site, which is capable of making a positive contribution to housing delivery both in the Town and the District as a whole.