

Baker Associates Position Statement

2c Justification and Effectiveness of the 1.5 Class B jobs per dwelling target in the Weston Villages and its implications for housing delivery

Support for the Policy

1. Issue 2c relates to Policy CS20: Supporting a Successful Economy, and particularly to Policy CS30: Weston Villages, which seeks employment-led development and sets out the relationship between the number of additional Class B jobs coming forward in the Weston Villages and the rate at which dwellings will be allowed to be added. The policy only applies to new development at the Weston Villages. Policy CS20 sets out a similar approach for some of the other dwellings to come forward at Weston-super-Mare.
2. We are supportive of the Policy and the Council's professed intent to address the underlying issue of the strategic imbalance of homes and jobs at Weston-super-Mare through its development plan. The policy as written seeks to present a reasonable balance between resolving the strategic issue and the need for development to proceed. Moreover it seeks to deal with a potentially very complicated matter in a reasonably straightforward way. The Council with the plan has sought to move from evidence to objective to policy response to a suitable monitor and management arrangement in a way which ought to be able to be used successfully in the implementation of development. We note that the policy is being taken forward in the Weston Villages Supplementary Planning Document, with the position that 'residential development will be limited to tranches of not more than 250 dwellings in advance of adequate job creation'. This is a very practical application of the policy.

Attempts to dilute the Policy

3. Representations have been made to the Hearing by parties who wish the policy not to have its intended effect, and these are in the form of a Joint Position Statement, document ED/25. There are no Proposed Changes from the Council before the Inspector. It appears however from ED/25 that the Council has reached an accommodating position with housebuilders and landowners concerned that the Council's policy will inhibit the delivery of houses. It is understood that Proposed Changes are to follow.
4. The relationship between the rate at which houses are built and the provision of jobs at Weston is fundamental to the submitted plan. The plan is to be an evidence-based plan. There is evidence that the level of car borne commuting into Bristol from Weston-super-Mare is high and that this is the cause of considerable concern to the Highway Authority in managing the M5. Allowing this situation to continue rather than seeking to improve the situation would not be consistent with the promotion of more sustainable development. The Council has so far sought to achieve some improvement through matters over which the plan has influence, particularly by addressing the imbalance in the number of homes and jobs at Weston and hence the attractiveness of Bristol as a source of employment for people resident at Weston.
5. This is a matter known to be of great concern to the Highways Agency and the Agency has consistently sought to prevent the balance of homes and jobs

being allowed to get worse. It is understood that the Agency has not relented on this matter and has no intention of doing so, but the Agency's formal response or comments at the Hearing are awaited. It is also understood that the Agency has not been party to the statement of common ground, notwithstanding the importance it is known to attach to this matter.

6. The Council has proposed that for the major new housing development to take place at the Weston Villages, housing will only come forward at a rate which is pegged to the number of jobs being created, so that there is a steady re-balancing of the number of homes and jobs over time. To be effective with this objective the number of new jobs has to be greater than the number of new homes. Parity would simply carry the current situation forward and if the number of jobs is less than the number of homes, matters will continue to get worse. In fact there has to be a significant excess of jobs over homes coming forward at the Weston Villages, because there has to be some catching up in relation to the homes that have continued to be built ahead of job creation since the issue was addressed in PPG10, and because the policy only applies to part of the housing supply from Weston-super-Mare which the plan makes provision for and therefore has to compensate for those houses coming forward unconnected with job growth.
7. If the plan is watered down in the way the Council is in agreement with interested parties that it should, then the Council is planning for worsening rather than improving the situation that is clearly understood from the evidence to already be a bad situation. The Council would be reversing the policy contained in the Replacement North Somerset Local Plan, failing the test of general conformity with Regional Strategy, since addressing this matter is a requirement of the current Regional Strategy, RPG10, and it would be failing in its duty under the 2004 Act to promote more sustainable development. The change would make the plan unsound (if it were not unsound already) in containing a policy that was ineffective in addressing a matter of strategic importance.

Economic issues

8. The current economic circumstances are given as the reason for watering down the strategic policy. The parties to the agreement are trading on the idea that jobs will be harder to create because of the economic circumstances. This is not something which the Council appears to believe given its position as a partner in the West of England LEP incidentally, since the LEP has not reduced its belief in the strength of the West of England economy or reduced its target for job growth.
9. We strongly suspect that the issue is more fundamentally the inherent difficulty in attracting employment investment to Weston on the scale wanted. Ironically for the type of employment investment that it is hoped to attract to the Weston Villages, good, timely and reliable connections to the primary road network will be a critical factor. By relenting on its strategic policy the Council would be creating the conditions for greater congestion diminishing the asset the proximity to the primary road network represents. The likelihood of attracting jobs would decrease and the whole situation would go into a vicious spiral.

Operation of the Policy

10. The parties to the agreement all have a vested interest in development taking place, as developers or landowners. The change sought to the way the policy is applied represents a very significant potential financial gain to these parties.
11. The change proposed in the Joint Position Statement to the way Policy CS30 is applied is presented as having a neutral effect over the plan period, by relaxing the policy at the outset and increasing its requirement later, so that the average ratio of jobs to houses over the plan period remains the same. This feels rather disingenuous. We have already noted that relaxing the policy in the first part of the plan period will make matters worse and the likelihood of attracting jobs in the future less, so increasing the likelihood of continuing the low requirement for jobs in the policy. The agreement between the parties includes a monitoring arrangement. It feels rather predictable that with monitoring and through internal reflection, the initial relaxation will be continued.
12. It is noted that the decision on how the intentions of the policy are managed in the future is not a matter for the planning authority, but for a Joint Delivery and Review Board. The composition of this group is conspicuously drawn from those who are party to the Joint Position Statement, by definition those with a vested interest in there being a very accommodating context for landowners and housebuilders. There is provision for the Board to include 'other relevant stakeholders agreed by those parties'. It is clearly not the intention of those in agreement to give any influence to those who might not be in agreement with them, and there is no provision for any independent consideration of the evidence or of the implications, nor any open opportunity for any views from other interested or affected parties to be heard.

The Policy and the Spatial Strategy

13. The issue addressed in Policy CS30 and the concerns raised at its potential implications may appear to be fundamental to the delivery of the housing relied upon for the District. Hence in the context of the Government's growth imperative, the temptation will be for any matters that might appear to inhibit the provision of housing to be swept aside. This would be a great error, but more particularly would be a profound misinterpretation of what the plan is for and can do.
14. The failure that the Council appears to see in its existing policy for employment led housing delivery at Weston is not a failure of the policy as currently drafted in the submission plan, but a failure of the spatial strategy at the heart of the Core Strategy.
15. The delivery of housing is one objective, though not one the Council has otherwise sought to address with much commitment. This is not the only objective however and should not be treated as such. Redressing the strategic imbalance between homes and jobs at Weston is another objective, along with reducing the level and impact of car borne commuting from Weston to Bristol, and the overarching objective of the plan must be to promote more sustainable patterns of development. The way that plans should be made is to identify possible ways that the objectives of the plan can

be addressed through the use of land and the alternatives that would deliver the maximum contribution to all of the objectives chosen as the preferred and most appropriate strategy. A plan is not sound unless this is demonstrably the process that has been followed. The delivery of housing - to the levels that are actually required too - can be combined with the strategic rebalancing of homes and jobs at Weston if the spatial strategy makes provision for development at the other end of the Weston-Bristol corridor, that is at south west Bristol.

16. Addressing development provision to the south west of Bristol positively through the plan rather than ignoring this clear requirement of the West of England functional area would enable the Council to fine tune the spatial strategy to maximise the contribution to the plan's objectives. For instance, a way to respond to the objectives of making sufficient housing provision overall whilst attracting jobs at Weston and also redressing the strategic jobs-homes balance at Weston would be by using the plan to manage the composition of the urban extension to the south west of Bristol. The Council for instance could take the view that it wanted sufficient employment within the urban extension to promote the opportunity for working locally (and to contribute to Bristol's employment land provision perhaps) but not to provide for employment of a scale and type that evidence suggested would compete with Weston for attracting employment investment. This would be positive, proper planning, of the type that planning authorities are encouraged to embrace.

Conclusion

17. The conclusion must be that the Council should stick with Policy CS30 and implement as it is written, but adopt a spatial strategy for the Core Strategy which enables the Policy to work as part of a package of provision to tackle the underlying issue and the vital strategic objectives for the area.