

Position Statement for the North Somerset Local Development Framework Core Strategy Examination

November 2011

Matter 3A-E – Spatial Strategy

submitted on behalf of

**The Homes & Communities Agency
& St Modwen Properties Plc**



1. Context

- 1.1 This statement seeks to build upon the previous representations submitted by the Homes & Communities Agency (HCA) and St Modwen Properties Plc in relation to the Core Strategy and their concerns with regards to the strategy for dealing with development within the Weston Villages area.
- 1.2 The HCA and St Modwen have a significant land interest at Locking Parklands, St Modwen also own significant employment land around Weston Airfield. Both parties have been involved in the progress of the North Somerset Core Strategy and have made a series of representations to the document including the Consultation Draft (November 2009) and the Key Changes Consultation Document (November 2010). Both parties have also sought to agree an employment led approach with the other major Weston landowners and the Council in advance of the Core Strategy EiP. A series of representations have also been submitted to the Weston Villages Supplementary Planning Document.
- 1.3 The HCA and St Modwen need to be satisfied that the Core Strategy continues to focus the main strategic development provision for North Somerset within the Weston Villages to deliver the significant employment led regeneration benefits for Weston and the wider area. The statement should therefore be considered as evidence at the session relating to matters 3A-E focusing on Spatial Strategy within the Core Strategy.

Agenda Item (a) 'The degree of weight to be accorded respectively to the extant RPG10 and the draft Regional Strategy (RS) and the evidence that underpinned the dRS with regard to the overall spatial strategy of the CS its and broad locations for development'.

- 1.4 We note the Council's concerns set out in paragraph 8 of document ED/03 (Response to the Inspector's Initial Note of 1 August 2011) regarding the RSS evidence base being pre-recession situation, and therefore providing inflated housing requirements. The HCA and St Modwen do not



wish to promote or imply their support for the figures within the RSS, however we are aware of precedents from elsewhere which the Inspector may consider. For example, we note that previous Inspector decisions have dismissed recession based arguments for reducing dwelling numbers on the basis that, whilst economic pressures might impact on construction and completions, the need for additional homes remains. The South Gloucestershire Core Strategy Inspector has confirmed (letter to the Council dated 15 August 2011) that *"whilst the RS has not been adopted it remains a material consideration and one which in the present circumstances I consider should be given considerable weight"*. He also raises concerns that *"the lower target promoted in the CS could undermine the soundness of the Plan. Restricting housing to the level proposed has implications for the economic vitality and robustness of the region, could lead to higher levels of commuting and act as a further constraint on the supply of affordable housing, significant issue in itself"*. Therefore, whilst the HCA and St Modwen do not, in any way, wish to promote the RSS figures within North Somerset, they seek reassurance that the strategy adopted by the Core Strategy ensures that the delivery of the housing needed to support economic growth, and affordable housing in particular, is not compromised.

- 1.5 In terms of the weight to be attributed towards RPG10, the HCA and St Modwen supports the underlying principles set out within RPG10 Policy SS10 (Weston-super-Mare) with regards to promoting the town for employment investment, regeneration opportunities, enhancing it's environment, enhancing tourist and business facilities and increasing accessibility. However, whilst the HCA and St Modwen are entirely supportive of the Council's current employment to housing ratio approach (see session 2a-c statement), they have significant concerns with regards to the outdated approach within the RPG to attempt to limit further housing growth until employment development is more closely in

balance with housing. So, whilst the broad thrust of the RPG vision to deliver mixed use development is supported, the work now undertaken for the Core Strategy employment led approach by the major landowners and the Council provides a much more realistic and practical interpretation to allow a truly employment led approach to be delivered.

- 1.6 Therefore, whilst the HCA and St Modwen do not wish to imply they support the levels of growth proposed within the RSS, they do seek reassurance that appropriate figures will be provided within the Core Strategy which will deliver the employment led regeneration within the Weston Villages. The HCA and St Modwen do question the weight to be given to RPG10 as the extant regional strategy in light of the historic nature of the policies.

Agenda Item (b) ‘Green Belt implications of the Core Strategy compared the draft RS’.

- 1.7 The HCA and St Modwen have previously stated that it is unlikely that all development identified for North Somerset over the next 20 years will be able to be realistically delivered on previously developed sites. HCA’s and St Modwen’s position on Green Belt sites reflects the latest Government national policy position set out within the draft National Planning Policy Framework (NPPF). The NPPF confirms that Green Belt sites should only come forward in exceptional circumstances including infilling in villages, limited affordable housing for local community needs, and partial or complete redevelopment of previously developed sites subject to impact on openness and impact compared to the existing development.

Agenda Item (c) ‘SW Bristol urban extension – including consideration of its deletion from the Core Strategy compared with the draft RS’.



- 1.8 The HCA previously considered that the urban extension would realise the potential of South Bristol. However, given the economic slowdown since the RSS housing figures were calculated, and the increasing need to focus delivery on the regeneration opportunity of the Weston Villages, there does not now appear to be a need to bring the South West Bristol Urban Extension forward.

Agenda Item (d) ‘Weston Villages developments as the main strategic provision of the Core Strategy, including by comparison with the draft RS provision for an urban extension SE of Weston’.

- 1.9 The HCA and St Modwen support the identification of major growth within the Weston Villages. If the Inspector is minded to allocate the South West Bristol Urban Extension, they are concerned this could now undermine, or be to the detriment of the delivery of the Weston Villages regeneration area.
- 1.10 The development of Weston Villages is fundamental to the future of Weston and surrounds, and the aspiration to secure employment led regeneration. The HCA and St Modwen support the extent of development proposed within the Core Strategy for the Weston Villages Regeneration Area, and have agreed an employment led approach to delivery with the Council and the other major landowners.

Agenda Item (e) ‘Distribution of housing and employment by existing settlement’

i. Weston super Mare

ii. Nailsea

iii. Clevedon

iv. Portishead

v. Service Villages including appropriateness of designations

vi. Infill Villages including appropriateness of designations’.



- 1.11 In terms of distribution of development within the District’s existing settlements, the HCA and St Modwen support the focus of provision within Weston. The existing urban area at Weston will support the future development of the Weston villages in terms of retail, service and employment opportunities. However, the scale and location of development within the existing Weston urban area should be carefully assessed to ensure that this is not at the expense of delivering the regeneration objectives for the Weston villages.
- 1.12 The HCA and St Modwen also seek to ensure that within the remainder of North Somerset where regeneration or community benefits can be demonstrated (including the provision of affordable homes), residential development sites will be permitted to come forward (subject to meeting the main policy objectives elsewhere within the Core Strategy). However, the HCA and St Modwen have previously highlighted (in response to Policy CS14) the requirement to ensure that development in the service / infill villages such as Banwell, Hutton, Locking and Uphill is carefully considered, so as to ensure that they do not compromise the regeneration benefits of Weston Villages in light of their proximity.