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My ref: RDW/10/P/0066/OT2
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Dear Nick

Application number: 10/P/0066/OT2
Proposal: Outline Planning Application with all matters reserved and Environmental Impact Assessment for mixed use development comprising circa 1,000 dwellings, 12,000m². B1- a, b or c employment space, improvements to infrastructure, retention and enhancement of Ashton Brook lake and woodland for recreational purposes together with additional open space, playing fields, children's play areas, community facilities, sites for railway station, primary school and road connection off the A370 Long Ashton bypass.
Location: Land to east of Wild Country Lane, south of Railway and north of A370, Long Ashton, Somerset, BS41 9EB

I refer to your letter of the 26 October 2010, our meeting of the 10 November 2010 and your subsequent letter dated 11 July 2011 in connection with the above planning application. As you know the application was registered back in January 2010. I apologise for the delay in responding.

As I explained in previous correspondence, since the application was registered there has been a change of government and a large number of significant ministerial announcements that have a serious impact on North Somerset Council's views on the merits of the above application. As you have rightly suggested the development of policy at both the national and local level have necessitated a delay in reviewing the merits of this and other applications and I am also aware of the Core Strategy situation at South Gloucestershire and Bath & North East Somerset.

The NSC Core Strategy was subject to public consultation between November 2009 and February 2010. Following this, a 'Key Changes Document' was produced and

consulted on in October/November 2010. In January 2011, the Core Strategy 'publication version' was issued and was subject to a 6-week consultation period. In July 2011 the Core Strategy was submitted to the Secretary of State in preparation for it to be examined at a Hearing starting in November 2011. The Council expects to receive feedback from the Local Plan Inspector in the first quarter of 2012.

Policy Consideration

The above application was submitted specifically in the context of a draft regional spatial strategy, which has been abandoned, and therefore, the application, if it were determined would need to be determined in accordance with the current Development Plan. In your planning statement dated December 2009 it is acknowledged that *"the proposal being advanced does not conform with the adopted Development Plan."*

Green Belt

As you know, this extensive proposal constitutes 'inappropriate development' in the Green Belt. PPG2 also stipulates a general presumption against 'inappropriate' development in the Green Belt except in 'very special circumstances'. This policy stance is supported by Policy RG/4 of the North Somerset Replacement Local Plan and Policy CS6 of the emerging Core Strategy. The introduction of large amounts of built development on unspoilt farmland would significantly diminish the existing sense of openness and thus cause material harm to the most important attribute of the Green Belt. The Secretary of State has restated his commitment to protecting the Green Belt and he continues to attach substantial weight to the harm to the Green Belt.

Little evidence has been provided, since the decision to abandon the draft regional spatial strategy, to justify the scale of development proposed, or that such a scale of development could not be met within the four main towns or outside the Green Belt or that it outweighs its harm to the Green Belt. In the absence of this, and given the fact that the application fails to comply with Development Plan and emerging Core Strategy policy objectives, it is considered that your client has failed to demonstrate that very special circumstances exist that would justify approval of this development as an exception to stringent Green Belt policy.

Locational Strategy

The application site is also located within the open countryside. Policy GDP/1 of the North Somerset Replacement Local Plan and Policy CS14 of the emerging Core Strategy sets out the strategy for development within the district. It directs major development to Weston super Mare and then to the other main towns.

The locational strategy approach set out in Policy GDP/1 of the Replacement Local Plan and Core Strategy seeks to distribute a quantum of development and requires that development of any kind in villages must be appropriate to the scale of the settlement in terms of its character and physical identity, local employment opportunities and access to retail, cultural and community facilities. In this case, the provision of 1,000 houses together with 12,000m² of employment space, playing fields, children's play areas, community facilities, railway station, and primary school together with new transport infrastructure is clearly inappropriate in scale to the existing village of Long Ashton.

The proposal does not therefore comply with the locational strategy and sustainability principles contained in PPS1 (Delivering Sustainable Development) and PPG13 (Transport) and the locational strategy for residential development as set out in policy 59 of the Joint Replacement Structure Plan. Furthermore the proposal is contrary to policies GDP/1 and H/1 of the North Somerset Replacement Local Plan.

North Somerset Council, as you will be aware, formally submitted the Core Strategy to the Secretary of State on Friday 8 July 2011 and the Core Strategy examination is programmed to start on the 23 November 2011.

The Local Planning Authority remain of the view, as set out in Policy CS6 of the Core Strategy, that urban housing needs should not be met in the Green Belt adjoining rural villages like Long Ashton.

Sustainable Development

Although the application is described as a sustainable mixed use extension to Long Ashton, there is little information and evidence to demonstrate how the development of 1000 new houses will enhance the existing village and produce an integrated, sustainable community for both existing and new residents. The proposal is fundamentally contrary to both the existing Replacement Local Plan locational strategy, and the emerging Core Strategy, both of which seek to focus employment growth at Weston-super-Mare as part of an employment-led strategy in addition to smaller scale employment provision at the other main towns of Clevedon, Nailsea and Portishead. Large scale employment in this location has the potential to impact on this strategy absorbing demand away from adjoining towns.

At a more micro level, the proposed scale and location of employment will have an impact on Long Ashton and the local road network. Equally the scale as is currently proposed is not enough to provide a balanced development and would therefore contribute to out-commuting. It has been suggested that there is currently only minimal employment provision with the village with the majority of existing residents out commuting to work, although the need for additional employment land within the village is highlighted as a key requirement within the Long Ashton Parish Plan. There does not appear, in the submission, to be enough employment to balance the residential and therefore additional out-commuting would result. Recent work carried out for the Council has identified an average job to home ratio of 0.75 jobs per home which takes into account the demographic make-up of the resident population in North Somerset and particularly the economically active population. This would require as a minimum, 750 jobs, in addition to further jobs to serve the village. However even considering pure B1 (a) type uses (at a standard employment density of 19m² (gross internal floor space) per workspace in accordance with the Employment Land Review practice guidance (2004)) only around 632 jobs would be available indicating 0.63 jobs per home. This though would not be supported by policy and particularly contrary to national policy of focussing such uses in town centres. Other B class uses with lower employment densities would start to require even more land to achieve the right jobs to homes balance placing additional pressure on the openness of the green belt and in terms of heavy transport movements in the vicinity.

In this regard, the proposal is contrary to Policies GDP/1 and GDP/3 of the North Somerset Replacement Local Plan and Policy CS20 of the emerging Core Strategy.

The submitted scheme fails to deliver sustainable development for the following reasons:

- 1) This urban proposal adjoins an existing and self-contained village that is not regarded as urban or suburban area.
- 2) Although some residents may choose to live and work within the development, the likelihood is that for many new residents, employment will be found outside the site resulting in out-commuting.
- 3) Given that the railway station cannot be guaranteed, the Transport Assessment has not included any additional shift to rail use, over that which would be normally expected and as such the figures are based upon a 80% use of the car, which is the current norm and suggests that the development will perform no better than Long Ashton in terms of non-car modal share. On this basis the development could be said to run counter to the desire for more sustainable development with less reliance upon the car.
- 4) The proposal fails to exploit, integrate or improve the existing infrastructure and services within the village of Long Ashton.
- 5) This new settlement of 1000 houses is capable of supporting a good range of local facilities, jobs, shops and leisure opportunities, however, fails to provide sufficient facilities to make the development sustainable.
- 6) Since there is no retail provision proposed on site, the 2000 or so residents, would be required to leave the site in cars to carry out their weekly shopping in either Nailsea or Bristol. The existing retail facilities in Long Ashton are unlikely to provide for all the shopping needs of the new residents and there is little evidence submitted with the application to suggest the applicant is prepared to enhance or improve shopping choice and service provision in the village. Even the submitted application has accepted that the village '*offers a limited range of services*'. The existing arrangement proposed by the development is regarded as inadequate and unsustainable.
- 7) Likewise, there are no medical facilities proposed on site and therefore the new residents will have to travel by car to Long Ashton and compete with the limited surgeries resources currently provided in the village. Such an arrangement is regarded as unsustainable.
- 8) This new housing development is not supported by a sustainable provision and range of employment opportunities and this shortfall will result in resource and energy implications, including the need for out-commuting.
- 9) The proposal fails to create a sustainable pattern of development, locating homes in places that are inaccessible to public transport, jobs and services.
- 10) The form and scale of the development together with the location of much of the site is isolation from the village and lacks sufficient connectivity to create social cohesion and integration with the existing village.
- 11) The development of this Green Belt location for predominately residential use fails to have regard to the protection of natural resources and local environment.

Transport

The proposed development is to be accessed from the A370 and Wild Country Lane. Although the submitted plans indicate a new junction with the A370 and Wild Country Lane, this has yet to been satisfactorily detailed by the applicant.

In terms of the Long Ashton by-pass (A370) the TA evaluates a number of alternatives:

1. Grade separated junction at Wild Country Lane. Whilst offering a small number of advantages (one being that it could form a part of a Barrow Gurney by-pass) the disadvantages are significant, of note being that the land to form the junction is not in the control of the developer and that the route would impact significantly upon Long Ashton in terms of trip diversion.
2. An at grade roundabout to A370. This proposal, where the development is accessed from a spur off a roundabout which could serve the Ashton Park development. However, without the Ashton Park scheme this option is unlikely to be available. Additionally, the junction is not in the control of the developer.
3. Dumb-Bell Roundabouts. This option, which is very land intensive, involves two roundabouts each offering a left off / left on from the by-pass. Again, the scheme is very disruptive of land and much of the scheme land is outside the control of the applicant.

The conclusion of the examination of the options proposes a new traffic signal junction at the eastern end of the development, where all the necessary land is within the site and or existing highway. One of the advantages of this option, as propounded by the applicant's highway consultant, is that it will allocate 'green time' for development traffic; however the direct consequence of this is that the flows on the main road are stationed to favour relatively small development flows. The formation of a junction is considered a 'piecemeal' approach which will be to the detriment of the main road as a major traffic distributor. As such the proposed access to the Long Ashton by-pass is considered to be contrary to Local Plan Policy T/10 in that the junction will be likely to compromise the safety and capacity of the class A highway.

It is further proposed to form two accesses to Wild Country Lane to the section between the railway bridge and the bridge over the by-pass. This length of the road is generally well aligned and some 6 metres wide, however to the north and south there are significant constraints. To the north is the railway bridge, which is too narrow for two-way traffic and lacks a path. In connection with the Barrow Hospital development, the road was to be narrowed to provide a dedicated path with the simple priority traffic flow maintained. It is proposed by the applicant that signals be installed to cater for the increased flows. However, given that an access to the A370 is not acceptable, that leaves the development wholly reliant upon Wild Country Lane, which is clearly unacceptable as neither the road nor its junctions to the network are suitable to cater for the flows from the whole development.

Historic Environment

It is not possible to assess the impact of the proposed development on the heritage assets without a comprehensive Visual Impact Assessment including drawings and photomontages illustrating the development in context. Building heights and rooflines have the potential to impact on the setting of, and relationships between, heritage assets. Views both into and out of the conservation areas, listed buildings and registered parks should be included in this work.

The comments from English Heritage refer to the need for an assessment of whether there is a deliberate historic visual relationship between the heritage assets in the landscape. One could take this a step further and suggest that there may be visual relationships between these assets that were not deliberate but that have evolved over time and that this should also be assessed.

Environmental & Public Protection

The Environment Agency has objected to the proposed development, as submitted, in the absence of an acceptable Flood Risk Assessment (FRA).

The FRA submitted with this application does not comply with the requirements set out in Annex E, paragraph E3 of Planning Policy Statement 25 (PPS 25). The details do not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. No information has been received that proposes a drainage strategy or a model of the watercourse as originally requested in July 2009.

Conclusions

In conclusion, the Council recognize that you and your client have spent time, effort and resources on the development of this application over the past 21 months and as you know we did agree an extension of time until the 4th February 2011 to determination the application. I see no merit or benefit in a further extension of time and decline your request to agree a further extension. I suggest your client withdraws the application.

Failing that, the Local Planning Authority proposes to 'finally dispose of' the application in accordance with the Town and Country (Development Management Procedure) (England) Order 2010, and place the application in Part 2 of the NSC register of planning application finally disposed of.

The decision to finally dispose of the above application is for the following reasons:

1. In view of the above detailed comments and policy objections, it is not proposed to make a decision on the application.
2. It has been decided by the Authority, by reason of article 29(2) and 33(2) that the time limits have expired without any appeal having been made to the Secretary of State.
3. The application has not been referred to the Secretary of State under section 76A or 77 nor has an appeal been lodged under section 78 of the Act.
4. The application has not yet been withdrawn.
5. In view of the considerable time that has elapsed since the application was submitted, the Local Planning Authority has a duty to inform all consultees and interested parties on the status of the application.

Yours sincerely

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