

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

November 2011

Matters 4a-g – Delivery, Provision of Infrastructure

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 4a-g focusing on infrastructure delivery within the Core Strategy.

## 2. DELIVERY

### **Matter (a) Housing Trajectory and whether rates of build are realistic.**

- 2.1 We have previously highlighted through our Position Statement submitted to the Spatial Strategy Session (Matter 3a-e PS207 paragraph 1.6) that the



HCA and St Modwen do not wish to imply they support the levels of growth proposed in the RSS, but 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. Therefore, through their Joint Position Statement with the Council on Employment Led Growth at the Weston Villages (Document ED/25), the HCA and St Modwen have endorsed the overall Core Strategy housing trajectory for the Weston Villages as shown within the Baseline Table A attached at Appendix A of ED/25 as follows:

2011/12 – 2015/16 = 1450 dwellings

2016/17 – 2020/21 = 2350 dwellings

2021/22 – 2025/26 = 1700 dwellings

TOTAL = 5500 dwellings

2.2 In addition to the above broad phase trajectory figures we also note the Council's anticipated annual trajectory for the Weston Villages' sites (Document ED/03 paragraph 113, page 42 - Response to the Inspector's initial note of 1 August 2011). The below extract shows the Council's trajectory for Locking Parklands as follows:

|                                   | 11/<br>12 | 12/<br>13 | 13/<br>14 | 14/<br>15 | 15/<br>16 | 16/<br>17 | 17/<br>18 | 18/<br>19 | 19/<br>20 | 20/<br>21 | 21/<br>22 | 22/<br>23 | 23/<br>24 | 24/<br>25 | 25/<br>26 | Total |
|-----------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-------|
| <b>Parklands<br/>(with pp)</b>    | 50        | 50        |           |           |           |           |           |           |           |           |           |           |           |           |           | 100   |
| <b>Remainder<br/>of Parklands</b> |           | 100       | 150       | 200       | 200       | 200       | 200       | 200       | 250       | 250       | 250       | 250       | 250       | 250       | 250       | 3000  |
| <b>Phase Total</b>                | 750       |           |           |           |           | 1100      |           |           |           |           | 1250      |           |           |           |           | 3100  |

Council's Anticipated Housing Trajectory for Locking Parklands (data from ED/03 paragraph 113).

2.3 Since the above trajectory was prepared (and as noted above) a joint position has now been formally agreed (Document ED/25) regarding the phasing of jobs to homes in the Weston Villages. The contents of ED/25 and the prescribed review mechanisms will have key implications for the



housing trajectory over the Core Strategy period. Therefore, the HCA and St Modwen wish to ensure that the trajectory is regularly reviewed and any changes to the employment position (i.e. major wins) which have implications for the prescribed jobs to homes ratio is reflected in a revised trajectory.

- 2.4 The HCA and St Modwen also wish to reiterate to the Inspector that the above trajectory also relates to land outside of their control at Locking Parklands. With regards to the question of how realistic the build rates are, the HCA and St Modwen are already on site building out Phase 1 (100 dwellings) and we welcome the reflection of this within the above trajectory. Assuming favourable market conditions and taking into consideration of the employment ratio requirements, St Modwen and the HCA believe that a figure of approximately 80-100 dwellings per annum on the land within their control is a realistic build out rate over the Core Strategy period. This equates to approximately 1200 - 1500 dwellings on their element of Locking Parklands over the remaining plan period.

**Matter (b) Land Availability within settlements with reference to the revised SHLAA and whether sites listed are achievable.**

- 2.5 The SHLAA (Document ED/09 - August 2011 Sites Appendix) identifies three sites within the Locking Parklands area:

- SHL22 – 51.26ha providing 1333 dwellings on land within the southern section of the site and also south of Annington Oaks.
- SHL23 – 34.64ha providing 970 dwellings on agricultural land adjoining the north eastern boundary of Locking Parklands.
- SHL24 – 32.2ha providing 904 dwellings on northern section of Locking Parklands and land to the north of Annington Oaks.



- 2.6 The HCA and St Modwen welcome the recognition of Locking Parklands as being suitable 'in principle' for residential development within the SHLAA. However, at this stage the HCA and St Modwen wish to highlight that the indicative boundaries shown for the above mentioned SHLAA sites do not entirely reflect the latest position proposed by the HCA and St Modwen in their masterplan work to date. The revisions to the site boundaries will have implications for housing numbers coming forward and will be subject to further discussion. The plan attached as appendix A provides their latest position (St Modwen's Amended Concept for SPD with Annotations - drawing 050\_DI\_60.1) and demonstrates that in order to meet the emerging objectives of the Weston Villages SPD, a flexible approach to the boundary of the area is therefore essential.
- 2.7 In addition to boundary issues, the HCA and St Modwen have previously raised concerns (response to Weston Villages SPD September 2011) about residential density on Locking Parklands. We note that the SHLAA sites are based upon the assumption of 40 dwellings per hectare (this was also the case in the above mentioned SPD), however the HCA and St Modwen have concerns that 40dph is not deliverable. This is due to a number of factors including:- the required land take from other proposed land uses (i.e. especially school / community facilities); the parkland setting of the site; the provision for family and aspiration housing; the existing and future 'village' characteristics of the surrounds; and the residential market in this location. Therefore in light of the density concerns raised above, the HCA and St Modwen have sought to amend the SPD policy to allow for a more appropriate range of 30-35dph across the site.
- 2.8 We note the revised land supply table as shown within change PS07 (page 3 - Document ED/15b – Schedule of Proposed Post Submission Changes) which shows the implications as a result of the revised district wide housing requirement. The remaining requirement for the settlements

of Clevedon, Nailsea, Portishead, the Service Villages and the Remainder of North Somerset combined is increased from 197 to 409 dwellings. As previously stated (Matter 3a-e PS207 paragraph 1.12) the HCA and St Modwen welcome the focus of development within the Weston Villages (with support from the Weston urban area) but have recommended 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.

### **3. INFRASTRUCTURE**

#### **(c) Projects Required to Support Development**

- 3.1 One of the key concerns to the HCA and St Modwen with regards to infrastructure projects in the Weston Villages is the Strategic Flood Solution. The case has been presented in detail within our Position Statement to the Session on Matter 3f Flood Risk (PS/106) that Locking Parklands largely falls outside of identified areas of flood risk, and is the sequentially preferable site within the Weston Villages. It has also been demonstrated that an on site solution to flood mitigation is possible. Therefore, the HCA and St Modwen have raised concerns regarding CIL contributions (see below point e) towards flood mitigation from Locking Parklands but have instead offered to provide water into the Super pond if required.
- 3.2 The HCA and St Modwen have previously raised concerns (Response to Weston Villages SPD September 2011) with regards to highways infrastructure linked to the Weston Villages. For example they have supported the principle of the north to south link but have sought clarification from the Council with regards to the evidence base to support this requirement at this stage.



- 3.3 The attached Amended Concept for SPD (Plan 050\_DI\_60.1 Appendix A) shows the extent of community infrastructure proposed within Locking Parklands, and also the advantages of co-location of the primary and secondary schools. St Modwen and the HCA (response to Weston Villages SPD – September 2011) have raised concerns previously with regards to the requirement for 9 community halls to service the new neighbourhood. The details of the community and green infrastructure projects will be discussed in more detail during the evolution of the Locking Parklands masterplan and the SPD for the Weston Villages. We will expect the Council to provide supporting evidence to substantiate their position with regards to their requirements.

**(d) Timing and Funding of Projects**

- 3.4 The implications of the recent funding announcement that North Somerset Council on behalf of the West of England Local Enterprise Partnership (LEP) has been awarded nearly £40m from the government's Regional Growth Fund will need to be assessed further. The HCA and St Modwen understand that the funding will be used to accelerate development and growth across the area, and maybe specifically targeted at assisting with opening up of employment sites. This could have significant implications for the delivery of infrastructure in the Weston Villages.
- 3.5 We understand that subject to due diligence, the Revolving Infrastructure Fund will be up and running in Summer 2012 with applications for funds expected at that point. As the administrative body is the Council, and the funds are a revolving process (with developers expected to pay the funds back once the development is underway), the HCA and St Modwen seek reassurance that all the major landowners in the Weston Villages are fully

- involved in deciding which infrastructure schemes will be supported and in which order.
- 3.6 We welcome the recognition by the Council (Document ED/16 page 1 section (b)) that some elements of infrastructure, specifically those prioritised as 'desirable' are likely to drop back beyond the end of the plan period in light of a funding shortfall. The HCA and St Modwen will continue to examine the scope and timing of required infrastructure projects on site at Locking Parklands to support the phases of development as they come forward. For example an over-provision of formal and informal open space has already been provided to support the phase 1 development at Locking Parklands. However, the extent of infrastructure to be provided will depend on the viability of such provision at that point in time, for example the Phase 1 development has only been possible as a result of HCA KickStart funding.
- 3.7 The HCA and St Modwen are keen to ensure that all potential traditional and innovative funding sources are fully explored to ensure that the shortfall is minimised and development therefore left viable. For example, recent Government initiatives may have positive implications for the timing and funding of infrastructure such as the identified J21 Enterprise Area. In addition, during the discussions to agree an employment led approach to development within the Weston Villages (Document ED/25), the HCA and St Modwen highlighted the potential to ring fence the funding from the New Homes Bonus towards employment infrastructure (i.e. super serviced sites, marketing etc).

#### **(e) Community Infrastructure Levy and Section 106 Planning Obligations**

- 3.8 The HCA and St Modwen welcome the work that has been undertaken by the Council since the Draft Development Contributions SPD (consulted on



in 2010), as the standard charge approach proposed a wholly unrealistic requirement of £42,774 per dwelling within the Weston Villages, particularly when compared to the requirement of £12,572 per dwelling outside of Weston.

- 3.9 However, the HCA and St Modwen have significant concerns with a blanket approach to CIL across the Weston Villages area given the different issues that are relevant to each site. For example, given the lack of detailed information at this stage (in terms of design and costs) for the Strategic Flood Mitigation measures, the lack of flood risk on Locking Parklands, and the offer of providing water discharge to the Super pond, the HCA and St Modwen cannot commit to CIL contributions towards flood mitigation. We therefore seek reassurance that this will be taken into consideration when considering the CIL levels for Locking Parklands.

**(f) Distinction of Infrastructure Contributions From Residential Development and Other Development Contributions**

- 3.10 Detailed discussions have taken place between the Council and the major Weston landowners to reach the joint position now shown within Position Statement (Document ED/25) with regards to the phasing of housing development and job provision within the Weston Villages. Fundamental to this strategy is providing the right environment to attract employers. Commercial attractiveness and viability is therefore key to the equation. The strategy set out within ED/25 therefore includes a focus on providing 'super serviced' employment land to provide the right environment for prospective businesses. Therefore, it is fundamental to the success of the 'employment led strategy' that the CIL is not applied to commercial floorspace, and any other contributions linked to commercial floorspace are removed in their entirety if at all possible.



### **(g) Viability Implications of Required Contributions for Proposed Development**

- 3.11 The latest figures (Document ED/16) indicate a contribution requirement of between £10,000 to £15,000 per dwelling within the Weston Villages, which is already subsidised using the New Homes Bonus. At this level the HCA and St Modwen still have significant viability concerns and have also raised concerns regarding the evidence base to support certain requirements such as transport infrastructure. The HCA and St Modwen will however reserve further comments until the findings of the Council's financial model of income and expenditure for key infrastructure at the Weston Villages is available.



**Appendix A – St Modwen’s Amended Concept for SPD with Annotations  
(drawing 050\_DI\_60.1)**

