

**North Somerset Core Strategy Examination**

**Position Statement**

(As confirmed by the Programme Officer Bristol Developments will be appearing in respect of Issue 1e)

**Issue 1e-f – District Housing Requirements**

- e. Affordable Housing
  - i. viability of the 30% benchmark figure
  - ii. rural exception sites in Green Belt
- f. Gypsy and Traveller site provision
  - i. projected deletion of government guidance circulars
  - ii. need for accommodation post-2011
  - iii. providing sites in the Green Belt

**Introduction**

- 1 Bristol Developments (BDs) has submitted a Position Statement in respect of Settlement Strategy, setting out issues with regard to the status of Cleeve. This Position Statement deals solely with the issue of the rural exceptions sites policy – CS17 and Proposed Change PC24 but it should be read in conjunction with the settlement strategy Statement issue 1e(ii) above.
- 2 BDs have no comment in respect of the other issues set out above as 1e(i) and 1f (i-iii).

*(continued overleaf)*

## Current Policy

3 The adopted Local Plan Policy on this matter is Policy H5. It states:

**Policy H/5 – Circumstances and criteria for releasing affordable housing sites in rural areas**

As an exception to normal planning policies, permission may be granted for affordable housing on sites within or adjoining villages, where housing would not otherwise be permitted, provided that the following criteria are met:

- i. a local housing need exists, demonstrated by a Housing Needs Study, or other satisfactory evidence such as a Parish Survey;
- ii. the proposal site should, wherever possible, be located in or adjacent to an existing settlement within which adequate social facilities and essential services are available;
- iii. the proposal site should, wherever possible, be accessible by public transport;
- iv. proposals should be modest in scale;
- v. proposals should be in keeping with the character of surrounding development and should not be intrusive in the landscape;
- vi. It can be demonstrated that there is no suitable other site to meet the local need and that the proposals would not lead to inappropriate development and would be consistent with the function the Green Belt, Area of Outstanding Natural Beauty, or retaining the best and most versatile agricultural land;
- vii. The affordable housing, including affordable home ownership initiatives, is provided in perpetuity.

4 The policy is supported by a reasoned justification. There is nothing in the policy which precludes a site in the Green Belt in principle.

5 Indeed at para 8.49 it is acknowledged that such sites may exceptionally be allowed.

6 Policy H5 is Saved – it remains adopted policy.

7 There is also an adopted Supplementary Planning Document (SPD) on affordable housing from 2008. That document again discusses rural exceptions sites. Again there is no presumption or exclusion of Green Belt sites.

8 The SPD has also been Saved and remains part of the adopted planning policy for North Somerset.

## Emerging Policy

- 9 In the emerging LDF Core Strategy, February 2011, is policy CS17. This states:

### Delivering strong and inclusive communities

#### CS17: Rural exceptions schemes

Housing schemes for 100% affordable housing to meet local needs within small rural communities will be supported where:

- a) the development meets an identified local need demonstrated by an up-to-date needs survey or other evidence;
- b) the development is supported or initiated by the parish council;
- c) the site search has followed a sequential approach with priority given to sites within any settlement boundary, sustainability principles, and avoiding sensitive locations;
- d) the scale of development is appropriate for the location;
- e) the affordable housing is provided in perpetuity.

Rural exceptions schemes will only be acceptable adjacent to the settlement boundaries of Service Villages and Infill Villages, but not in the Green Belt.

***This policy contributes towards achieving Priority Objective 8.***

- 10 The supporting text states with regard to the Green Belt:
- “The Green Belt is a key policy constraint within the north of the district. Those rural communities living within the Green Belt are generally well related to higher order settlements, including Bristol, where affordable housing opportunities should be concentrated. Affordable housing proposals in the form of rural exceptions sites will not be acceptable in the Green Belt.”
- 11 There have been a number of Proposed Changes to the policy set out in a document in July 2011, and most recently in September. These do not alter the general approach of preventing sites in Green Belt locations coming forward.
- 12 There are a significant number of evidence base documents supporting the LDF including ones on housing, housing numbers, settlement function and hierarchy and affordable housing. None of these explains why the change involving Green Belt villages has been put forward.

**Does the change in policy reflect a change in adopted National Planning Policy?**

13 In simple terms no. National policy on housing and including affordable housing is set out in Planning Policy Statement 3 (PPS3), June 2011. This deals with rural exceptions sites.

14 It states:

“In providing for affordable housing in rural communities, where opportunities for delivering affordable housing tend to be more limited, the aim should be to deliver high quality housing that contributes to the creation and maintenance of sustainable rural communities in market towns and villages. This requires planning at local and regional level adopting a positive and pro-active approach which is informed by evidence, with clear targets for the delivery of rural affordable housing. Where viable and practical, Local Planning Authorities should consider allocating and releasing sites solely for affordable housing, including using a Rural Exception Site Policy. This enables small sites to be used, specifically for affordable housing in small rural communities that would not normally be used for housing because, for example, they are subject to policies of restraint.”

15 Although more recent than the adopted Local Plan there is no mention of Green Belt in the policy or elsewhere in PPS3 when dealing with affordable housing.

**Are there emerging national policy changes?**

16 The draft NPPF sets out some very important changes to policy in relation to affordable housing exceptions sites. On the Green Belt the NPPF states:

A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- buildings for agriculture and forestry
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building
- the replacement of a building, provided the new building is not materially larger than the one it replaces

- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (excluding temporary buildings), whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. (my emphasis)

- 17 This is a fundamental change in policy. From being inappropriate by definition but being possible as exceptions, this would now see an affordable housing scheme in the green belt as an appropriate form of development.
- 18 The Planning Inspectorate has offered advice to its Inspectors on how they should use the draft NPPF in considering planning appeals. It will be noted that although a draft document the emerging policy in the NPPF can be treated as a material consideration.
- 19 As the Inspectorate note also sets out the NPPF shows the direction of travel of government policy. The North Somerset LDF policy CS19 is travelling in the opposite direction, without justification.
- 20 The proposed policy approach of CS17, and as set out in the Council's Position Statement of settlement strategy is that in Green Belt locations such as Cleeve, its housing needs should be met elsewhere in other settlements deemed acceptable because they are beyond the Green Belt.
- 21 This seems a highly unsatisfactory and unsustainable approach which BDs have noted elsewhere will be likely to have a detrimental impact on the services and facilities in settlements like Cleeve.
- 22 Following a Housing Needs Survey of Cleeve undertaken by the Parish Council and the Rural Housing Enabler in 2004, The Rural Housing Trust identified 29 households could not satisfy their housing needs in the open market and concluded that a local needs housing scheme of say 10-12 properties with a mix of 2 and 3 bedroom dwellings would go some way towards meeting this need.

- 23 Given that this survey is historic this situation will have only deteriorated and the shortage of affordable dwellings in the village is severely impacting upon local people who are unable to compete in the general open market.
- 24 The Councils suggested approach is that this need should be met elsewhere, an approach contrary to the adopted Local Plan which would allow an exceptions site to come forward and clearly at odds with the emerging NPPF.
- 25 With the Localism Bill now having received Royal Assent this gives Parish Council's the opportunity to make plans etc and to promote development to meet local needs.
- 26 The Council's proposed policy is again clearly at odds with Localism. In settlements like Cleeve, the Parish Council can't plan to meet its local needs but must instead rely on another Parish elsewhere to do this.
- 27 Policy CS17 again appears to be travelling in the opposite direction to national policy as now set out in the Localism Bill.

### **Conclusion**

- 28 In the view of BDs Policy CS17 should be amended to remove the prohibition on the development of exceptions sites in the Green Belt.
- 29 Clearly if the NPPF is adopted in its proposed form, further amendments to the policy and other policies related to the Green Belt will be necessary to reflect the changed status of affordable exceptions sites in policy terms.