

**North Somerset Core Strategy**  
**Examination of Remitted Policies**  
**Supplementary Statement for Examination Hearings**

**On behalf of the Long Ashton Land Company**

**28 February 2014**

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## **1. INTRODUCTION**

- 1.1 This Statement is submitted on behalf of the Long Ashton Land Company, which has an ownership interest in respect of land adjoining the western edge of Long Ashton. It is structured to follow the agenda headings set out for the forthcoming Examination Hearings.
- 1.2 The Inspector conducting the Examination has been clear that initially the focus will be on examination of policy CS13. If this policy is found to be sound with amendments, it would then be necessary to assess whether consequential effects arise in respect of other remitted policies and to re-examine those as necessary. This Statement therefore focuses on policy CS13, with reference to other remitted policies where this assists in terms of clarity.

## 2. STRATEGIC CONTEXT

- 2.1 The extent to which there is a requirement for the Core Strategy to take a strategic view and the degree to which this informs policy CS13 are fundamental issues.
- 2.2 North Somerset Council (the Council) places a high degree of emphasis upon the fact that the duty to cooperate in the preparation of development plans came into force on 15 November 2011, and therefore after submission of the Core Strategy for examination on 8 July 2011. This is the basis for the Council's contention that the duty to cooperate is not a relevant consideration in respect of the proposed amendment to policy CS13.
- 2.3 However, while the legal position in respect of the duty to cooperate not being a requirement at the time of preparation of the Core Strategy has been upheld by the High Court Judgement, it is not appropriate to use this as a construct for failing to take due account of relevant strategic matters and evidence that have a cross-boundary dimension. It has long been the case that achieving sustainable development is a fundamental principle of the planning system and this is reiterated and reinforced by the National Planning Policy Framework (NPPF).
- 2.4 Sustainable development requires consideration of the the established pattern of development and infrastructure, the inter-relationships between settlements and the issues, needs and opportunities these factors give rise to. Therefore, irrespective of the applicability of the duty to cooperate, achieving sustainable development necessitates cross-boundary cooperation when setting the planning policy framework for an area.
- 2.5 North Somerset is part of the West of England Local Enterprise Partnership (LEP) area, which is, in essence, the Bristol city-region. Bristol is the dominant centre for economic, cultural and related activity. Over 40% of the jobs in the LEP area are within the Bristol City Council area (Bristol City Council Employment Land Study, para. 3.4) and the percentage will be significantly higher if the extent of the functional urban area, extending in to South Gloucestershire, is taken into account.
- 2.6 The Council is engaged in collaborative working via the LEP and the Core Strategy does recognise the important role played by Bristol. Policy provision is made in the Core Strategy for improving transport links with the city. However, this is offset by an approach that is substantially inward looking. In July 2010, following the Government's announcement of an intention to revoke the Regional Spatial

Strategies the Council resolved upon three key development principles comprising protection of the Green Belt, no development at the south west boundary of Bristol and employment-led regeneration focussed on Weston Super Mare. Potential options that might facilitate the most sustainable pattern of development through Green Belt boundary amendment to facilitate the relationship with Bristol are therefore precluded. Notwithstanding the Core Strategy acknowledgement of the role played by Bristol, the city is most prominently identified as a source of problems in the form of out-commuting. This approach also contributes to the likely under-delivery of new homes to serve Bristol and its economic growth potential, as identified at paragraph 48 of the Inspector's Report on the soundness of the Bristol Core Strategy.

- 2.7 The Core Strategy is not therefore prepared within an appropriate strategic context to achieve sustainable development and growth. In particular, it does not take sufficient account of the potential for a positive and sustainable growth orientated relationship with Bristol, particularly for those parts of the district that are closest to the city and have a good level of transport infrastructure provision. Similarly, these matters are not adequately assessed by the Sustainability Appraisal Supplementary Report: Revised Policy CS13 (January 2014).

### **3. HOUSING REQUIREMENT**

#### National Policy

- 3.1 Paragraphs 158 and 159 of the NPPF require local planning authorities to ensure their Local Plan is based on up to date evidence, including the preparation of a Strategic Housing Market Assessment (SHMA), in collaboration with neighbouring authorities where the housing market area crosses administrative boundaries. It requires the SHMA to take account of household and population projections, needs in respect of all types of housing and relevant market and economic signals.
- 3.2 The housing requirement in the published proposed amendments to the Core Strategy is based on updated population and household projections. However, the assessment is confined within the administrative boundaries of North Somerset and is not based on the recognised housing market area. It does not take account of market signals or consider the needs for all types of housing, including affordable housing.

#### Strategic Housing Market assessment

- 3.3 A West of England SHMA was produced in 2009 and a new SHMA is proposed with a final draft report due in 2013 (Pre-Production Brief Consultation March 2013). For the reasons set out above, the assessment of the housing requirement does not constitute a SHMA as required by the NPPF.
- 3.4 The 2009 West of England SHMA for example cites an affordable housing requirement in North Somerset of 1,050 (Table 4.6) for the period 2009-2021, and applying this to the period from 2009 to 2026 produces a total affordable housing requirement for 24,150 affordable homes over that period. This in itself greatly exceeds the total amount of planned housing, including both market and affordable housing.

#### Objective Assessment of Housing Requirement

- 3.5 Without a housing market area basis, the proposed housing requirement cannot constitute a full and objectively assessed need. It is evident for example, from the Inspector's report on the soundness of the Bristol Core Strategy, that the city has a level of housing need that cannot be entirely met within its administrative boundary.
- 3.6 The absence of a full and objective assessment of need is exacerbated by the rationale for selection of the proposed housing requirement of 17,130 homes. This

figure has been selected from a range produced by Edge Analytics for the Council. Edge Analytics recommended that the Council use the range of 'current growth trend' scenarios, from a suite of five scenarios, as the basis for review of future housing provision. This range is from 17,130 to 20,220 but the Council is proposing the lower of these figures. The rationale put forward for this does not accord with an objective assessment of the housing requirement but constrains it through application of a contention that a higher number cannot be delivered, application of a homes:jobs ratio for maintenance of an employment-led approach and a spatial strategy which seeks to avoid amendment of the Green Belt boundary. The application of this latter point requires consideration of the spatial strategy as part of the examination of policy CS13.

- 3.7 The NPPF is clear that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan (para. 83). When reviewing boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. In this respect, North Somerset adjoins the city of Bristol, which is tightly enclosed by Green Belt. However, sustainable development opportunities exist where there is significant infrastructure enabling sustainable travel to and from the city and where development would not substantially harm the purposes of including land within the Green Belt or the Core Strategy Green Belt objective of preventing sprawl of Bristol and preserving the character of existing settlements. Land on the western edge of Long Ashton is an example. Here, there would be no impact on maintaining separation from Bristol and there is a range of significant transport infrastructure available, which is to be enhanced by the South Bristol Bus Rapid Transit and Road Link. Review of the Green Belt boundary is therefore necessary in order to facilitate a full and objective assessment of the housing requirement and to enable a sustainable pattern of development that is not over-reliant on application of a homes:jobs ratio to control housing delivery.
- 3.8 Whilst aiming to provide jobs close to where people live is a reasonable planning objective, this cannot be at the expense of meeting the full and objectively assessed housing need or recognition and response to the realities of economic geography and the role played by Bristol as a Core City, with the opportunities this creates within its hinterland. The supporting text to policy CS 13 sets out an approach of aligning development of new homes more closely with employment growth and provides that housing supply will be monitored. The supporting text to related policy CS20 similarly provides that employment land take-up will be

monitored. Also, within policy CS13 there is provision to review the appropriate level of new homes in 2016 and 2021. However, there is no indication as to how under-delivery on jobs would be addressed. Policy CS13 and associated CS20, as currently structured, therefore risk under-provision of housing once the full and objective requirement is established.

- 3.9 A failure to identify and plan for the full housing requirement is inherently unsustainable and this matter is not assessed by the Sustainability Appraisal Supplementary Report: Revised Policy CS13 (January 2014).

#### 4. HOUSING STRATEGY

- 4.1 The fundamental principle of national planning policy as set out in the NPPF is the delivery of sustainable development and this is reflected in Priority Objective 1 of the Core Strategy which seeks to deliver sustainable housing development across North Somerset to meet housing needs.
- 4.2 In the absence of a full and objective assessment of the housing requirement, there is a significant risk that the Core Strategy will not deliver this objective. A failure to plan for the full housing requirement is in itself unsustainable.
- 4.3 The proposed amount of planned housing is in part determined by a spatial strategy that provides for limited development in the Service Villages and does not consider the merits of reviewing the Green Belt boundary. This results in a strategy that fails to recognise opportunities for sustainable development related to the proximity of Bristol and existing and planned infrastructure that provides for sustainable access to the city. Long Ashton for example is very close to Bristol and its jobs market, benefits from substantial existing and planned infrastructure and, unlike some other site identified in the SHLAA, is not subject to major constraints. But, its ability to capitalise upon these virtues is constrained by the Green Belt that tightly contains the settlement. However, in Winscombe within the rural area on the southern edge of the district, where employment opportunities and access to Weston Super Mare by sustainable transport means are limited, the Strategic Housing Land Availability Assessment 2013 identifies potential for 205 homes. The spatial strategy therefore both constrains the assessment of the housing requirement, fails to fully realise the potential for sustainable development and risks creating unsustainable development.
- 4.4 The application of a job:homes ratio is a fundamental principle of the Core Strategy. However, as it is currently proposed it risks constraining the ability of the Plan to fully meet the housing requirement. If delivery of jobs falls significantly below the planned level, this will create a planning barrier to delivery of new homes. While a review of housing numbers is built into policy CS13, there is a lack of clarity over how such a situation would be addressed without building up a backlog of unmet need and related impacts on economic growth.
- 4.5 The planned total provision of new jobs is a minimum of 10,100 as set out in policy CS20 and it is noted that this appears to be based on an assumed gva growth per annum of 2.1% compared to the rate of 2.6% in the draft West of England Strategic

Economic Plan 2013-2030. The supporting text to this policy however refers to a minimum target of 14,000 jobs due to a need to address a backlog at Weston Super Mare. The forecasts produced by Edge Analytics included a jobs- led scenario using employment targets provided by the Council. Including completions from 2006-2011 this produces a housing requirement of 25,950 over the period 2006-2026. The proposed strategy, based on 17,130 additional homes does not therefore support delivery of the Councils objective for employment growth.

- 4.6 Again, these matters are not adequately assessed by the Sustainability Appraisal Supplementary Report: Revised Policy CS13 (January 2014).

## 5. CONCLUSIONS

- 5.1 A strategic cross-boundary approach is essential to achievement of sustainable development and the Core Strategy does not adequately provide this.
- 5.2 The proposed level of planned housing is not based on a full and objective assessment of needs and is constrained by application of the homes:jobs ratio and a spatial strategy that has not considered the full potential for achieving a sustainable pattern of development through review of the Green Belt. The evidence, including from the Edge Analytics report commissioned by the Council, suggests the housing requirements is significantly higher. This should be reflected in the Core Strategy.
- 5.3 The housing strategy, as proposed, will not deliver the Core Strategy of achieving delivery of sustainable development. It artificially constrains delivery by an over-reliance on a homes:jobs ratio and a pre-determined spatial strategy that fails to fully consider and realise the potential for sustainable growth relationships with Bristol through review of the Green Belt boundary.
- 5.4 These matters are not fully assessed within the Sustainability Appraisal Supplementary Report: Revised Policy CS13 (January 2014).
- 5.5 It would seem perverse to finalise a Local Plan subject to these deficiencies, even if subject to review, because that review would be necessary very soon after adoption, as a result of significant new evidence that will be available through the new West of England SHMA. In these circumstances it is considered that the Core Strategy requires either substantial modification or withdrawal. It is very clear that Bristol is unable to fully meet its housing need within the administrative boundary of the city. Within North Somerset it is very likely that a higher number of homes needs to be planned for and there are options for accommodating some of the housing requirement in a sustainable way through development in areas close to Bristol, where there is good transport infrastructure connecting to the city. Immediate commencement of a Green Belt review therefore appears to be an appropriate response in order to explore sustainable options and facilitate delivery of housing to meet the full requirement.



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