Core Strategy Hearing Statement

Matter 3 – Policies

On behalf of Gallagher Estates

May 2016
1.0 BACKGROUND

1.1 We act on behalf of Gallagher Estates who own the majority of land at Pill Green (see enclosed plan).

1.2 We have previously made substantive submissions in respect of land in this area acting for the previous landowners RS Hill Settlement. Gallagher now owns “the Hill land” and we continue to promote the land on their behalf. Given that we have submitted significant and comprehensive representations in respect of the site to the North Somerset Core Strategy and Site Allocations Plan documents previously, we have kept our comments as succinct as possible. We will expand on the points made within these participant statements in person at the Hearing Sessions.
2.0 MATTER 3 – POLICIES

3. In those settlements and locations where the consequential changes have significantly increased the housing requirement, can it be demonstrated that the capacity exists to deliver the increased number of homes to enable the Core Strategy housing requirement, including those of the consequential changes, to be met in the following locations, in terms of overall numbers and housing mix?

a. Policy CS28: Weston-super-Mare
b. Policy CS30: Weston Villages
c. Policy CS31: Clevedon, Nailsea and Portishead
d. Policy CS32: Service Villages
e. Policy CS33: Infill villages, smaller settlements and countryside

2.1 In terms of the broad distribution of the residual requirement this is identified in the Core Strategy as Weston-super-Mare, followed by the towns of Clevedon, Nailsea and Portishead and then 2,132 homes at the 9 service villages, of which Easton-in-Gordano/Pill is one.

2.2 There is insufficient justification provided to determine where the housing requirement will be delivered and where the capacity exists within the Core Strategy, or an up to date Sustainability Appraisal. Whilst the Draft Site Allocations Plan seeks to plug the gap, it has not been subject to independent Examination and cannot therefore be relied on to provide a sound basis to retrospectively re-distribute the housing requirements of the Core Strategy, particularly as it has not been based on an up to date Sustainability Appraisal.

2.3 We remain of the view that the Council must significantly increase the provision for housing in the Core Strategy to adequately meet the need for market and affordable housing in the housing market (which includes Bristol City) and in order for the Core Strategy to be found sound. To meet the identified need, the Council should undertake a proper assessment of the Green Belt around Bristol to identify appropriate locations for extensions to the urban area.

2.4 The draft Site Allocations Plan (‘the Plan’) seeks to identify sites to deliver the updated Core Strategy housing target of 20,985 homes during the plan period 2006 - 2026. Over the period April 2006 to April 2015 the draft Plan states that 7,426 homes have been built, leaving a residual requirement of 13,559 homes to be identified up to 2026. To this
end, the draft Plan makes provision for a residual housing supply of 13,688 homes as follows:

- Proposed new allocations, unimplemented allocations from the North Somerset Replacement Local Plan and large unimplemented housing sites - 11,890 homes (including Weston Villages);

- Other large sites with unimplemented planning permissions - 225 dwellings;

- Small sites with consent: 373 homes;

- A windfall allowance over the period 2015 - 2026 - 1,200 dwellings;

2.5 We question the validity of introducing new sources which are unimplemented allocations and sites.

2.6 It is important to note that the Core Strategy and Site Allocations Plan have both been prepared during a period of uncertainty in plan-making, given that: (1) the Core Strategy re-examination may find the continuation of the existing spatial strategy to be inappropriate; (2) the adopted Core Strategy will, in any event, be reviewed at the end of 2018; and (3) the West of England Joint Spatial Plan consultation (which deals with the key strategic issues on housing, employment, infrastructure and Green Belt) begins in Autumn, 2016. This all raises significant challenges for the preparation of the Plan.

2.7 On this basis, we consider that North Somerset should be planning for a greater number of homes, to ensure that it does not increasingly rely on unimplemented housing allocations and permissions, which are not all guaranteed to be delivered during the remainder of the Plan period. There is no certainty that such sites will be able to deliver housing and as such there is no assurance that the settlements and sites identified have sufficient capacity to meet the revised requirement. In order to ensure that sufficient capacity exists we consider it is necessary to allocate additional sites, such as land at Pill.

4. Is the plan, with the consequential changes, flexible and resilient enough to ensure that the housing requirement is met? Are there modifications that need to be made to make it more flexible and resilient? In particular, should there be more flexible wording in respect of:

a. Policy CS32: Service Villages
2.8 The Core Strategy considers that there is no justification for a comprehensive review of settlement boundaries and at this stage settlement boundaries have not been amended to take into account proposed new housing allocations. However, by the time the Plan is adopted, North Somerset anticipates that the settlement boundaries will be redrawn to take account of these allocations. We consider that this approach does not represent ‘effective’ plan-making as including boundaries which will soon be out of date renders the Plan undeliverable over the Plan period. The approach to settlement boundaries in the Plan is therefore unsound and needs to be reconsidered, and revised settlement boundaries included as part of the consultation process.

2.9 In our response to Question 3 we have highlighted a very real risk that even if the current housing requirement were to be adopted, and notwithstanding our view that the figure should be significantly higher, there is insufficient justification provided to demonstrate that the allocations have sufficient capacity to meet the housing requirement. The current Plan is therefore unsound. In order to provide more flexibility and to calculate the level of housing required to be delivered, additional sites should be allocated.

2.10 Land at Pill Green represents a sustainable location to deliver approximately 1,000 new homes as an urban extension to the wider Bristol area. Pill Green forms a logical extension to Pill, and to south west Bristol, in a highly sustainable location well-served by access and facilities. Despite the site's location in the Green Belt, it was assessed in the previous Regional Spatial Strategy Colin Buchanan Green Belt Review (February 2006) as not contributing to preventing urban sprawl. The subsequent ARUP Urban Extension Evidence Base Review (February 2007) states that “comprising an extension to Pill, an extension in this location is not deemed to present a coalescence issue”. The Colin Buchanan study ranked areas of the Bristol and Bath Green Belt into six categories depending upon their sensitivity to change. Area BB, uniquely among areas of the inner Green belt around Bristol, including Pill, was ranked in the category of causing second least harm. Pill Green therefore presents a key opportunity to be allocated as a Joint Spatial Plan site, but should also be considered as such through North Somerset’s site allocations process.

2.11 Further regional context is provided in the recently published West of England Devolution Agreement which states that the West of England Combined Authority and government agree to forming a strong partnership to support key large housing sites, which further strengthens the opportunity for Pill Green.
2.12 The Sustainability Appraisal of Rural Settlements (February 2016) document which accompanies the Draft Site Allocations Plan assesses Easton-in-Gordano/Pill as scoring amber i.e. as having some evidence of seven of the eight sustainability credentials, including:

1. Well connected;
2. Active, inclusive and safe;
3. Well run;
4. Fair for everyone;
5. Environmentally sensitive;
6. Well designed and built; and
7. Thriving.

2.13 The settlement is also assessed as green i.e. as there being good evidence of sustainability characteristics in terms of being well-served. The settlement does not score red i.e. little evidence on any of the sustainability credentials.

2.14 However, neither the February 2016 Sustainability Appraisal, or the 2011 Sustainability Appraisal, take into account the re-opening of the Portishead railway line, and the reinstatement of a railway station at Pill which will provide rapid, high quality, frequent access to the centre of Bristol and poses a very attractive alternative to the car. The new railway station at Pill represents a material change in circumstances, and as such the Sustainability Appraisals are fundamentally out of date.

2.15 Furthermore, as set out in our representations to the Joint Spatial Plan, Pill Green is a sustainable location for growth. Copies of the complete representations can be made available to the Inspector on request. However, we summarise these below:

- Access and Movement: The site is strategically well placed to take advantage of existing and planned public transport connections to Bristol city centre, the Enterprise Zone and other key destinations. There is potential to provide for easy and direct walking routes to existing bus stops to take advantage of the 25 minute bus journey to Bristol city centre and to potentially incorporate the X3 bus service into the site providing good permeability and new bus stops in close proximity to the proposed new homes. The re-opening of the Pill Railway station in 2019 provides a further opportunity for sustainable transport. The station is a 1,360m walk (approximately 15min) or approximately 4min bike ride from the centre of the site and the proposed rail service will provide a convenient, frequent service to Bristol city centre and the enterprise zone. There are also two attractive cycle
routes that connect the site to Bristol city centre and the Enterprise Zone. Cycle route 41 runs to the north of the site and provides a traffic-free connection alongside the River Avon to Bristol City Centre and the Enterprise Zone. There is also a recently improved traffic free cycle route along the A369 to Bristol via Ashton Court. For both of these routes the distance is approximately 5 miles (25 mins bike ride). There are therefore a range of realistic, direct and efficient sustainable transport options for Pill Green residents to connect to Bristol City Centre and the Enterprise Zone.

- Landscape Considerations: The Landscape Visual Assessment (LVA) demonstrates that Pill Green sits discretely in both the local and wider landscape. The site has strong visual and physical containment and has well defined boundaries made by tree cover, by hedges and hedgerows with substantial trees. A future residential development at Pill Green, guided by landscape led principles, set out in the LVA, would allow for a sympathetic and successful relationship with both the countryside and the settlement. On this basis, Pill Green has the capacity to accommodate residential development without significant harm to its landscape setting.

- Flood Risk: The entirety of the site is shown by the Environment Agency’s (EA’s) Flood Zone Mapping to be within Flood Zone 1 which comprises land assessed as having a low risk of river or tidal flooding.

- Ecology: No part of the site is covered by any statutory ecological designations. Two non-statutory designated sites, Pill Paddock, Avon Wildlife Trust (AWT) Nature Reserve and Ox House Bottom and Markham Brook, a North Somerset Wildlife Site (NSWS), are located within the site. These features are, however, relatively limited in extent and can be adequately accommodated and mitigated through masterplanning of the site.

2.16 The Inspector to the previous round of the Core Strategy Examination acknowledged in his report (March 2012) that Pill is a sustainable location for new homes, stating that:

“In the event of additional development capacity becoming necessary in a future review of the CS, it would be for NSC to consider providing for it by way of one or more urban extensions in the Green Belt south west of Bristol as proposed by the dRSS, whether at Long Ashton or at Pill as suggested by different Representors, or at other locations either within or outside existing settlements.”
2.17 We support the above assessment of Easton-in-Gordano/Pill as being a sustainable settlement, and based on its assessment it should be considered by North Somerset as a sustainable location for housing growth to deliver the housing number required in North Somerset and the region.

2.18 At present the Core Strategy is not planning for sufficient new homes. At best it will provide a stop gap before a proper Plan can be prepared through the Joint Spatial Plan, but in order for the current Core Strategy to be found sound we are of the view that it needs to consider the full objectively assessed need, taking into account the regional context provided in the Joint Spatial Plan and demonstrating cross-boundary working with the other three West of England authorities.

2.19 Given the five year housing land supply shortfall and the requirement to accommodate new housing identified in the Joint Spatial Plan, North Somerset will need to reconsider their housing target if the Plan is to be sound. Currently, there is no evidence to suggest that the Plan has been positively prepared, or is effective, having considered cross-boundary strategic priorities.

2.20 We remain of the view that the Council must significantly increase the provision of housing within the Plan and the Core Strategy to adequately meet the need for market and affordable housing in the housing market (which includes Bristol City) and in order for the Plan to be found sound. Current revisions to the remitted policies are not sufficiently flexible to allow for the level of housing required. The policy changes have been kept to a minimum in order to try to avoid de-railing the Core Strategy, but not in the interests of proper plan-making or in order to achieve the most sustainable form of development. To meet the identified need, the Council should undertake a proper assessment of the Green Belt around Bristol to identify appropriate locations for extensions to the urban area and Sustainability Appraisal to inform the allocations required to meet the housing requirement and policy changes required to achieve this.

2.21 The review of the Core Strategy before the Joint Spatial Plan is advanced runs the risk of pre-determining the outcomes of the Joint Spatial Plan. In its current state, the Core Strategy fails to demonstrate that it has been positively prepared or effective, with little evidence of how the Plan is in line with the Joint Spatial Plan, or of a commitment to joint-working with the West of England Authorities.

5. Does the increased housing requirement justify any modification to:

a. Policy CS6: Green Belt
2.22  The Core Strategy is not underpinned by an up to date Sustainability Appraisal. A proper and up to date Sustainability Appraisal would identify land at Pill and other locations in the Green Belt as sustainable options for growth. In the absence of a Sustainability Appraisal or Green Belt review, it is unclear how can the Council be sure that it is the most appropriate option when considered against all other options. The release of Green Belt in such locations must be a reasonable alternative. The Core Strategy in its current form is therefore unsound.

2.23  The Core Strategy states that despite the housing number increasing from 14,000 to 20,985 over the Plan period, the housing target can be met without requiring any review of the Green Belt. Given the increase to the housing target and the current preparation of the West of England Joint Spatial Plan, which is highly likely to increase the housing target further, and require the West of England authorities to look beyond their Green Belt boundaries, this approach is considered to be unsound.

2.24  Through our participation at the Core Strategy Examination and via the emerging West of England Joint Spatial Plan, we are promoting the need for a Green Belt review and that North Somerset Council should consider land at Pill, and to plan properly for the housing needs of the West of England, and North Somerset.

2.25  We are promoting Pill Green through the Joint Spatial Plan as a sustainable location to deliver approximately 1,000 new homes as an urban extension to the wider Bristol area. The Joint Spatial Plan currently identifies the need for 85,000 new homes over the next 20 years, but we consider the true OAN to be significantly higher, and we estimate it to be more like circa 153,000 homes (including BANES). Strategic development around the wider Bristol urban area within the Green Belt, such as Pill Green, are necessary and one of the major components of a sustainable location to accommodate the new homes required in the Bristol city region.

2.26  We consider that Pill Green forms a logical extension to Pill, and to south west Bristol, in a highly sustainable location well-served by access and facilities. Despite the site's location in the Green Belt, it was assessed in the previous Regional Spatial Strategy Colin Buchanan Green Belt Review (February 2006) as not contributing to preventing urban sprawl. The subsequent ARUP Urban Extension Evidence Base Review (February 2007) states that “comprising an extension to Pill, an extension in this location is not deemed to present a coalescence issue”. Pill Green therefore presents a key opportunity to be allocated as a Joint Spatial Plan site, and should be considered as such through North...
Somerset’s site allocations process. The Colin Buchanan study ranked areas of the Bristol and Bath Green Belt into six categories depending upon their sensitivity to change. Area BB, uniquely among areas of the inner Green belt around Bristol, including Pill, was ranked in the category of causing second least harm. Pill Green therefore presents a key opportunity to be allocated as a Joint Spatial Plan site, but should also be considered as such through North Somerset’s site allocations process.

2.27 Pill Green represents a suitable and sustainable location to create a high quality integrated new neighbourhood. As recognised by the ‘Assessing the Sustainability and Settlement Hierarchy of Rural Settlements in North Somerset’ document, which forms part of the Site Allocations consultation, the site is in a sustainable location, well-served by local facilities and services, and with good access links. The re-opening of the Portishead railway line will provide rapid, high quality, frequent access to the centre of Bristol. Pill Green therefore presents a sustainable location to accommodate new homes, and this opportunity should be considered by North Somerset in their plan making process.

2.28 As part of the promotion of Pill Green for 1,000 homes through the Joint Spatial Plan, there is an opportunity for the immediate release of a first phase of the site to be allocated in North Somerset’s Plan and Core Strategy, in order to contribute to the local housing requirement, and allocate new homes in a sustainable location. Allocating Pill Green would assist North Somerset in demonstrating a 5-year housing land supply position and should therefore be considered for allocation by North Somerset.

2.29 Further regional context is provided in the recently published West of England Devolution Agreement which states that the West of England Combined Authority and government agree to forming a strong partnership to support key large housing sites, which further strengthens the opportunity for Pill Green.

2.30 Failing to review the Green Belt boundary at this stage is unsound as it is not the most appropriate option when considered against all reasonable alternatives. Even if it is adopted, and the intention is to review the Green Belt, it will result in a Plan that on adoption will become almost immediately out of date, given the likely requirement for the West of England authorities to plan for unmet need from neighbouring authorities. On this basis, the Core Strategy is not positively prepared and is ineffective and fails to be based on effective joint working on cross-boundary strategic priorities.

6. Is there any significant risk that the consequential changes to the policies would present any identifiable and unresolvable conflict with any of the Core Strategy’s extant policies, having regard in particular to:
2.31 In order to meet the employment objectives of Policy CS20 and the Joint Spatial Plan, the housing number must be increased and based on a full objective assessment of need, or risk failing to deliver the objectives of the Core Strategy and holding back economic development and employment opportunities in North Somerset.

a. the employment-led strategy of Policy CS20 (which is not before this Examination);
b. any other extant policy not before this Examination;
c. and if so, what modifications to the consequential changes might be required?
APPENDIX A
SITE LOCATION PLAN