NORTH SOMERSET SITE ALLOCATIONS PLAN EXAMINATION

MATTER 6

OTHER MATTERS

POSITION STATEMENT

ON BEHALF OF

MOOR PARK (NORTH SOMERSET) LTD
1. **Introduction**

1.1 This Position Statement sets out a brief response on behalf of Moor Park (North Somerset) Ltd (MP) to the Inspector’s questions in relation to Matter 6.

1.2 It should be read in conjunction with the MP’s submissions to:

- North Somerset Site Allocations Plan Consultation Draft (April 2016) (MP1)
- North Somerset Site Allocations Plan Publication Version (December 2016) (MP2)
- Position Statements relating to other matters identified by the Inspector for consideration at the Examination.
2. **Issue 6.2**

*It is stated at para 4.12 that the settlement boundaries have been reviewed as part of the SAP – can the Council identify any documents?*

2.1 Reading SD1, paragraph 4.12 as a whole it is MP’s interpretation that any review of settlement boundaries that has been undertaken has been partial and limited. Indeed, it is conceded in the second sentence of paragraph 4.12 that there has not been a ‘comprehensive’ review. *Ipso facto*, there is no evidence base to support such a review.

2.2 The flexibility introduced by Inspector Bore to make sound the other remitted Core Strategy policies, and in particular Policies CS28, CS31 and CS32, hinges on how settlement boundaries are defined. It is essential that the boundaries are up to date and properly reflect the limits of existing development. Failure to do this would not, in practice, achieve the flexibility that Inspector Bore held to be necessary to ensure the deliverability of the Core Strategy housing requirement.

2.3 Where the Council is also intending to introduce strategic gaps to maintain the separation between settlements, it is also imperative that settlement boundaries up to date to define robustly the limits to existing urban areas, and to instill sufficient flexibility to achieve the intentions of Inspector Bore. Similarly to Green Belt boundaries, if strategic gaps are to endure, they must not include land that may be required for development future development. Given that settlement boundaries have not been subject to comprehensive review, and strategic gaps are being set through the plan absent such review, the boundaries of strategic gaps have not been robustly defined.

2.4 For reasons set out in response to Issues 5.4 and 5.5:

- The proposed SGs pull in the opposite direction from the flexibility intended by Inspector Bore.

- There has been no robust testing of SG boundaries having regard to future needs for sustainable development outside settlement boundaries at the main settlements.
In physical and land-use terms, land between Haywood Village and Oaktree Residential Park is now part of the urban area of Weston-super-Mare and should be excluded from the SG. The absence of a comprehensive review of settlement boundaries has failed to acknowledge this change and has therefore resulted in erroneous and indefensible SG boundaries which includes land that is not essential to maintain separation and that has important potential for sustainable development.

2.5 The failure to undertake a comprehensive and robust review of settlement boundaries is therefore a significant weakness of the Plan. It threatens its ability to implement the requirements of the Core Strategy, and in particular the necessity, and provisions, for ‘flexibility’ on the basis of which Inspector Bore found it to be sound. Moreover, absent such a review, there is no sound basis on which to define SGs.
3. **Issue 6.3**

*Does the Policies Map correctly reflect the proposals in the SAP?*

3.1 The Policies Map fails to correctly reflect the proposals in the SAP in relation to Moor Park/Weston Business Park. It fails to distinguish between the ‘proposed employment site’ cited in Schedule 2 to which Policy SA 4 is relevant, and the ‘safeguarded employment site’ cited in Schedule 3 to which Policy SA 5 applies. There is in consequence a lack of clarity as to the existing and proposed employment land, which may have resulted in double-counting between Schedules 2 and 3.

3.2 Given that land is allocated at Moor Park to meet the employment requirements of Weston-super-Mare, it therefore is properly construed as forming part of the urban area, and the settlement boundary should be extended to include it.

3.3 For reasons set out above and in relation to Matter 5, the settlement boundary should be defined on the Proposals Map to include Haywood Village extending as far as Oaktree Residential Park to include Moor Park and land to the south between the business park and Oaktree Residential Park. In this respect the Policies Map further fails to reflect the proposals in the SAP.