Gladman Developments Ltd
North Somerset Sites and Policies: Part 2: Site Allocations Plan
Examination Hearing Sessions

Matter 6 – Other Matters

April 2017
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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 that set out the process followed in this review?

6.2.1 The Inspector has correctly identified that the Council, in para 4.12, do indeed state that the settlement boundaries have been reviewed and remain largely fit for purpose. However, the paragraph goes on to state that no justification for a comprehensive review of the boundaries has been identified and that the only amendments made were to extend the boundaries to encompass recent developments.

6.2.2 No evidence can be found, in the submission documents, which categorically sets out how the process of the review of settlement boundaries was undertaken, nor as to how the conclusion that no amendments where considered necessary was made.

6.2.3 It appears that the Council have simply amended existing settlement boundaries to take into account recently completed developments. They have not even amended the boundaries to surround the allocations contained in the Site Allocations document which would limit the current flexibility which is built into the Core Strategy policies.

6.2.4 The Inspector, at the Core Strategy Remitted Policies Examination, specifically requested that flexibility should be built into Policies CS28, CS31 and CS32 in order to ensure that the Council has some contingency, should delivery of the allocated sites be delayed and should the Council not be able to maintain a 5-year housing land supply.

6.2.5 The Inspector stated in para 22 of his report on the Remitted Policies that:

“The wording of the remitted policies is in many cases too restrictive to provide the flexibility necessary to ensure the delivery of sufficient homes.”

6.2.6 He goes on to state in para 28 that:

“Policies relating to development in settlements are couched in restrictive terms and there is insistence on development within settlement boundaries which the Council has indicated will not (on the whole) be changed within the life of the Plan. This would make it very difficult in practice to meet the raised housing requirement. It is necessary therefore to introduce some additional flexibility into the submitted policies. This must be enough to give the Plan greater resilience and ensure that the housing requirement is met and a 5 year housing land supply is maintained, without substantially altering the nature of the spatial strategy embodied in the policies.”

6.2.7 The lack of a comprehensive review of current settlement boundaries for all settlements potentially jeopardises the effectiveness of the flexibility written into these policies. The flexibility built in clearly relates to development within or adjacent to settlement boundaries.

6.2.8 If settlement boundaries have not been comprehensively reviewed there may well be settlements where the defined boundary does not follow the extent of the existing built up settlement, thus rendering the application of the flexibility in Policies CS28, CS31 and CS32 ineffective. It is
considered that this approach is therefore unsound and not consistent with the adopted Core Strategy.

6.2.9 In addition, not extending the settlement boundaries to encompass the proposed allocations set out in the Site Allocations Plan would mean that the allocations themselves are contrary to the Council’s own Core Strategy policies which is somewhat perverse.

6.2.10 It is therefore considered, that if the Council cannot provide the detailed evidence that sets out how the settlement boundaries have been reviewed, and how the decision that they remain fit for purpose was derived, then the Council should undertake this exercise afresh. This should involve the detailed assessment of all settlement boundaries in the Plan with amendments made to those boundaries, where necessary, to reflect the extent of the settlements, taking into account the proposed allocations. This should then be consulted upon as part of the Proposed Modifications with additional Hearing Sessions scheduled should the Inspector consider them necessary.