



North Somerset Council  
Planning Policy & Research  
Town Hall  
Walliscote Grove Road  
Weston-super-Mare  
BS23 1UJ

SENT BY E-MAIL AND POST

28<sup>th</sup> April 2016

Dear Sir / Madam

### **NORTH SOMERSET DRAFT SITE ALLOCATIONS PLAN (SAP) CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations and in due course appear at Examination Hearing Sessions to discuss these matters in greater detail.

The purpose of the SAP is to help deliver key policies set out in the Core Strategy adopted in 2012. However this Draft SAP (pre submission consultation expected in September 2016) is described by the Council as a transitory document in the context that :-

- The remitted policies (CS6, CS14, CS19, CS28, CS30, CS31, CS32 and CS33) of the Core Strategy will be re-examined in Examination Hearing Sessions to be held on 21 – 23 June 2016 ;
- The adopted Core Strategy will be reviewed by the end of 2018 ;
- Key strategic issues on housing, employment, infrastructure and Green Belt changes will be incorporated into West of England (WoE) Joint Spatial Plan (JSP) 2016 – 2036 ;
- Development Management Policies Local Plan Part 1 Main Modifications consultation ended on 2 March 2016.

This contextual background provides a number of challenges :-

- The conclusions of the remitted policies examination are unknown. The Inspector may determine that a continuation of the existing spatial

strategy, the Council's residual housing requirement of 1,715 dwellings and / or the settlements and locations proposed by the Council for increased housing numbers are not appropriate. Any such conclusions would have consequences for the Draft SAP as set out in this current consultation ;

- From the representations submitted by the HBF and other parties to the WoE JSP Issues & Options consultation ended on 29<sup>th</sup> January 2016 the Council will be aware of the concerns of the development industry about the WoE JSP evidence base in particular the Wider Bristol SHMA for North Somerset, South Gloucestershire and Bristol which excludes BANES. If the current evidence base remains unchanged the WoE JSP as proposed will be unsound. Therefore going forward into the future the WoE JSP will not provide the strategic plan making context envisaged by the Council. This strategic matter must be resolved as soon as possible by the four neighbouring LPAs and the West of England LEP.

The housing requirement for North Somerset is 20,985 dwellings (2006 – 2026) as confirmed in the Secretary of State's letter dated 18 September 2015. The Council proposes to allocate sites of more than 10 dwellings and to re-draw settlement boundaries to account for proposed development. There are no proposed amendments to Green Belt boundaries because the full housing requirement can be met. The residual land requirement calculated by the Council is 13,559 dwellings. The Council's housing land supply comprises of:-

- 6,500 dwellings on strategic allocations in Weston Villages and Weston Super Mare ;
- 11,890 dwellings on new and unimplemented allocations ;
- 225 dwellings on unimplemented consents on large sites ;
- 373 dwellings on unimplemented consents on small sites ;
- 1,200 dwellings as windfall allowance.

In the Schedule to **Policy SA2** the Council sets out proposed site allocations totalling 11,890 dwellings as follows :-

- Weston Super Mare – 8,892 dwellings comprising 6,128 dwellings on 2 SUEs at the Weston Villages (allocated in the Core Strategy under **Policy CS30**) and 2,764 dwellings on 34 sites in the urban area ;
- 1,508 dwellings comprising of 234 dwellings on 9 sites in Clevedon, 865 dwellings on 8 sites in Nailsea and 409 dwellings on 7 sites in Portshead ;
- 1,247 dwellings on 14 sites in Service Villages ;
- 76 dwellings on 3 sites in Infill Villages.

The Council should clarify that these numbers correlate with the amended Table under **Policy CS14** – Distribution of New Housing of the Core Strategy remitted policies consultation. There also appears to be a discrepancy between the proposed site allocations plus windfall allowance of 13,090 dwellings and the residual land requirement of 13,559 dwellings which the

Council should explain. At pre submission stage the SAP should be accompanied by an updated 5 YHLS calculation.

It is noted that in the Draft SAP under **Policy SA7** the Council proposes the allocation of circa 127 Designated Local Green Space amounting to circa 1,500 acres. As set out in paras 76 and 77 of the NPPF Local Green Space designation will not be appropriate for most green areas or open spaces because any areas designated as Local Green Spaces must be demonstrably special to a local community and be of particular local significance because of its beauty, historic significance, recreational value. This qualifying criteria is also emphasised in the NPPG (ID 37-009-20140306). Furthermore the NPPG advises that where land is already protected by designations such as Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area, consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space (ID 37-011-20140306). The HBF would query whether circa 1,500 acres of green spaces in North Somerset are demonstrably special to a local community and of particular local significance to warrant designation. Since Designated Local Green Space should be local in character as opposed to an extensive tract of land as stated in the NPPG (ID: 37-015-20140306) the blanket designation of extensive tracts of land and open countryside adjacent to settlements is not appropriate. Para 78 of the NPPF confirms that managing development within a Designated Local Green Space should be consistent with national policy for Green Belts. Therefore Designated Local Green Spaces should not be proposed to achieve by stealth what could be seen as the designation of new localised Green Belts around smaller settlements.

It is hoped that these representations are of assistance to the Council in informing the next stages of the North Somerset SAP. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**

e-mail: [sue.green@hbf.co.uk](mailto:sue.green@hbf.co.uk)  
Mobile : 07817 865534