

DELEGATED REPORT

Application No:	17/P/5545/OUT	Target date:	19.06.2018
Case officer:	David Tate	Extended date:	
Proposal:	Outline planning permission for the erection of up to 200 dwellings, a Health Centre, a Doctors Surgery, retail outlets and office/employment space with all matters reserved for subsequent approval		
Site address:	Land Off, Bleadon Road, Bleadon, North Somerset		

DELEGATED REPORT (GENERAL)

SUMMARY OF MAIN ISSUES AND RECOMMENDATION

The Site

The Application

The application is made in Outline with an illustrative Masterplan for 200 houses alongside a Health Centre/Doctor's Surgery (300m²), retail outlets (300m²) and office/employment space (300m²).

It is also proposed to provide on-site public open space (NEAP).

The submitted application includes:

- Design and Access Statement
- Flood Risk Assessment
- Drainage Assessment
- Highways Assessment
- LVIA
- Ecology Survey
- Energy Statement
- SCI
- Affordable Housing Statement

Planning History/Background – most recent applications

There is no relevant planning on the site

Monitoring Details (if applicable)

N/A

Affordable Housing (if applicable)

See below

Policy Framework

The site is affected by the following constraints:

- Outside the settlement boundary for Bleadon

The Development Plan

North Somerset Core Strategy (NSCS) (adopted January 2017)

The following policies are particularly relevant to this proposal:

Policy Ref	Policy heading
CS1	Addressing climate change and carbon reduction
CS2	Delivering sustainable design and construction
CS3	Environmental impacts and flood risk management
CS4	Nature Conservation
CS5	Landscape and the historic environment
CS9	Green infrastructure
CS10	Transport and movement
CS11	Parking
CS12	Achieving high quality design and place making
CS13	Scale of new housing
CS14	Distribution of new housing
CS33	Infill Villages
CS34	Infrastructure delivery and Development Contributions

The Sites and Policies Plan Part 1: Development Management Policies (adopted July 2016)

The following policies are particularly relevant to this proposal:

Policy	Policy heading
DM1	Flooding and drainage
DM2	Renewable and low carbon energy
DM6	Archaeology
DM8	Nature Conservation
DM9	Trees
DM10	Landscape
DM24	Safety, traffic and provision of infrastructure etc associated with development
DM25	Public rights of way, pedestrian and cycle access
DM26	Travel plans
DM27	Bus accessibility criteria
DM28	Parking standards
DM32	High quality design and place making
DM34	Housing type and mix
DM36	Residential densities

Sites and Policies Plan Part 2: Site Allocations Plan (adopted April 2018)

The site is not an allocated housing site within Schedule 1 to Policy SA1

Other material policy guidance

National Planning Policy Framework (NPPF) (July 2018)

The following is particularly relevant to this proposal:

Section No	Section heading
2	Achieving sustainable development
5	Delivering a sufficient supply of homes
7	Requiring good design
8	Promoting healthy and safe communities
9	Promoting sustainable transport
11	Making effective use of land
12	Achieving well-designed places
14	Meeting the challenge of climate change, flooding and coastal change
15	Conserving and enhancing the natural environment

Supplementary Planning Documents (SPD) and Development Plan Documents (DPD)

- Residential Design Guide (RDG1) Section 1: Protecting living conditions of neighbours SPD (adopted January 2013)
- Residential Design Guide (RDG2) Section 2: Appearance and character of house extensions and alterations (adopted April 2014)
- North Somerset Landscape Character Assessment SPD (adopted December 2005)
- Biodiversity and Trees SPD (adopted December 2005)
- Creating sustainable buildings and places SPD (adopted March 2015)
- Travel Plans SPD (adopted November 2010)
- Affordable Housing SPD (adopted November 2013)
- Development contributions SPD (adopted January 2016)

Joint Spatial Plan

The draft Publication Version of the Joint Spatial Plan being prepared jointly by the four West of England authorities is the subject of a formal consultation process running from 22 November 2017 until 10 January 2018. The plan will then be submitted for public examination likely to take place in late 2018.

Consultation summary

Copies of representations received can be viewed on the council's website. This report contains summaries only.

The Environment Agency: Providing the Local Planning Authority (LPA) is satisfied the requirements of the Sequential Test under the National Planning Policy Framework (NPPF) are met, the Environment Agency would have no objection, in principle, to the proposed development, subject to conditions.

IDB: No objection subject to condition.

Avon & Somerset Fire Service: No objection subject to conditions

Avon & Somerset Police: At this stage where only outline planning is sought it is very difficult from a crime reduction/prevention point of view to give detailed comments as the areas to be addressed as detailed design would normally be decided upon at reserved matters stage. Any future reserved matters application should clearly reflect measures taken to design out crime, failure to consider the above may result in the Police objecting to the application for failing to consider crime and disorder and the fear of crime as required by the NPPF.

AONB: The Mendip Hills AONB Partnership produced the Mendip Hills AONB Management Plan 2014-19 on behalf of the joint local authorities and this is also a material consideration. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB that create the Mendip Hills sense of place and identity and these include views from the Mendip Hills across the Somerset levels and a sense of tranquillity.

The National Planning Policy Framework (NPPF) under paragraph 115 sets out that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.' Natural England's National Character Area (NCA) profile for the Mendip Hills (141), sets out that the area is 'renowned for its tranquillity and inspirational qualities ...' Within the NCA Statement of Environmental Opportunity under SEO1 it sets out 'Safeguard inward and outward views ...conserve and enhance the special qualities, tranquillity, sense of remoteness and naturalness of the area.

From reviewing the application documentation and visit to open access land of Hellenge Hill within the Mendip Hills AONB and to the north of Bleadon Village, whilst Bleadon Village is currently 'tucked' within the contour lines, the proposed extension would significantly extend the built form over open fields that form part of the views of the Somerset levels. I have concerns that the full extent of the proposed development would be visible and negatively impact on views from Hellenge Hill.

Bleadon Parish Council: In summary, at Bleadon Parish Council's meeting on 4th May 2018 the Council resolved to object in the strongest possible terms to this planning application. (The full list of objections is set out at Appendix A)

Third Parties: 387 letters/emails of objection have been received. The principal planning points made are as follows:

- Affect local ecology
- Close to adjoining properties
- Conflict with local plan
- Development too high
- General dislike of proposal
- Inadequate access
- Inadequate parking provision
- Inadequate public transport provisions Increase danger of flooding
- Increase in traffic
- increase of pollution
- Information missing from plans
- Loss of light
- Loss of parking

Loss of privacy
 More open space needed on development No Opinion expressed on development Noise nuisance
 Not enough info given on application
 Out of keeping with character of area Over development
 Potentially contaminated land
 Residential Amenity
 Strain on existing community facilities Traffic or Highways

Principal Planning Issues

Issue 1: The principle of development

Section 38 (6) of the Planning and Compulsory Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. This is consolidated in paragraphs 11 and 47 of the NPPF. The relevant parts of the development plan for the site comprises the adopted policies within the Core Strategy and Development Management Policies.

This proposal is in outline form and is proposed for 200 dwellings adjacent to the A371 Bridgewater Road. The site is outside but adjacent to the settlement boundary for Bleadon and has not been allocated for residential development in the recently adopted Site Allocations Plan. Bleadon is an Infill Village, where expansion beyond the settlement boundary would be contrary policy. In addition, the criteria set out in Policy CS33 on infill villages seek to ensure new development will be strictly controlled in order to protect the character of the rural area and prevent unsustainable development. The policy states that residential development, 'within' the settlement boundary at Bleadon may be acceptable so long as it is of appropriate scale which supports sustainable development. The development may also be acceptable providing that the form of development respects the scale and character of the settlement and the size, type, tenure and range of housing has regard to local needs. Also, that there is no significant adverse impact on service delivery and infrastructure provision and the local infrastructure is sufficient to accommodate the demands of the development.

Since the site is located outside of the settlement boundary of Bleadon as established in the Development Plan and given its scale and type compared to the size of the village, the scheme would be at odds with the location strategy for new development and contrary to Core Strategy Policy CS33. It would also conflict with Core Strategy Policies CS5 together with Policy DM10.

The application site is not within the settlement boundary of the village and is regarded as being in the countryside. The settlement boundaries have been reviewed as part of the Site Allocations Plan policy SA2 and remain fit for purpose. It is recognised that the primary function of the settlement boundary is to control development in the countryside and concentrate development appropriate to the scale and needs of that community.

For the purposes of the Local Plan, 'countryside' is defined as all otherwise unallocated land outside defined settlement boundaries. The "countryside" can be adversely affected by inappropriate development and the only type of residential development that may be acceptable in the countryside, covered by policies DM44, DM45, and DM46, are replacement dwellings, the conversion or re-use of rural buildings to residential use or rural workers dwellings.

Policy CS14 relating to the distribution of housing, states that new housing development up to 2026 will be focused in Weston super Mare and will include the strategic allocation at Weston Villages. Outside Weston, most additional development will take place at Clevedon, Nailsea and Portishead and at Service Villages where there will be opportunities for small-scale development of an appropriate scale either within or abutting settlement boundaries or through site allocations. Elsewhere development will be more strictly controlled within the settlement boundaries of infill villages such as Bleadon.

The scheme is proposed to include land for health centre/doctor's surgery, retail outlets and office/employment. In terms of the health centre and doctor's surgery, the applicant has provided no information that any local health trusts or developers would be willing or able to develop such a facility within the village of Bleadon.

The assumption is that most residents use the surgeries in Weston-super Mare. There is no doctor in Lympsham, and Bleadon is outside the catchment area for the Brent Area Medical Centre in East Brent. Although such local services would be welcomed and be supported by policy, no information has been provided by the applicant into the viability considerations, funding, procurement, wider development issues and costs involved in the construction of a new-build healthcare centre for 1000 residents, especially when most GP practices would require at least 2000 patients per GP to make a practice viable. In terms of the retail/employment offer; again, the applicant has provided no information to demonstrate these services together with construction costs would be viable for such a small catchment.

From the information and policies set out above, it is concluded that this major housing scheme, even with the offer of new local facilities, is inappropriate in scale and in an unsustainable location as highlighted in the Development Plan and more particularly, contrary to the purposes of the up-to-date Site Allocations Plan that has identified the detailed allocations required to deliver the North Somerset Core Strategy, consistent with government guidance.

The NPPF (para 11) states that in areas where the LPA cannot demonstrate it has five years supply of deliverable housing sites the Development Plan should not be regarded as up to date. The most recently tested figure for NS housing supply is 4.4 years (Laney's Drove Locking) In this respect the Development Plan cannot be regarded as up to date. However, d) within para 11 states that planning permission should be granted unless 'the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed'. (footnote 6). In this case the site is in an area that is at risk from flooding. The 'tilted balance' will not therefore apply in this case.

Issue: 2 The impact on the character of the Landscape

Policy CS5 of the Core Strategy states that the character, distinctiveness, diversity and quality of North Somerset's landscape and townscape will be protected and enhanced by the careful, sensitive management and design of development. In addition, policy DM10 of the Sites and Policies Plan seeks to protect the character, distinctiveness and quality of the landscape, and proposals are expected to demonstrate sensitivity to the existing local character.

The application site is within the coastal zone between the Mendips and the sea. It carries no national or statutory designations and is Grade 3 agricultural land. In the 'North Somerset Landscape Character Assessment' the area around the application site is known as the Bleadon Moor landscape character area. It lies adjacent to the Mendip

Ridge landscape character area. Bleadon Moor landscape is characterised by its flat low lying rural nature, with relatively large-scale fields predominantly bounded by hedgerows. It has a network of lanes, dykes and ditches, and some minor intrusion from long established commercial enterprises. The rising land of the Mendips is a notable feature to the north and east. The character of the site as an integral part of Bleadon Moor is apparent from two particular vantage points. These are Purn Hill immediately to the north-west and Uphill, to the north.

The development of the site for 200 houses on 12 hectares of open land with a network of roads and parking would have a significant visual impact on the area.

Although the agent has suggested there is no argument over scale, this is not the case. The scale of the scheme is inappropriate for the whole site would cease to be seen as agricultural in character and therefore would no longer contribute to the open green field character of the whole coastal zone. In its place would be a residential development that would be perceived as man-made and alien to the existing characteristics which define Bleadon Moor. Although Bleadon Moor can be assessed as having a low to moderate sensitivity to change overall, the proposal is in a localised area on the edge of the village which has greater sensitivity because of its location adjacent to higher ground. The character of the area would therefore be adversely affected by the proposal. Despite the comments from the applicant, a large part of the landscape objection is the acceptability of the development in this location and on the impact on the AONB and key views from the AONB when viewed in a wider landscape contrary to Policy DM11.

Purn Hill gives the clearest public views into the site. This is an important and valued local resource and the fact that there are areas where the application site is obscured by vegetation is of limited importance. Much of the pleasure of using the path is to enjoy the outward vistas. The effect from Uphill would be reduced by distance, but the development would still be visible in the landscape, with a urban appearance to that which currently exists. The proposal would introduce an unacceptably harmful intrusion into, and dilution of, the character of the landscape. It would also have an unacceptably harmful impact on the appearance and visual appreciation of the landscape, and as a result conflict with the above policies.

Also, the approach into the village from the west along Bleadon Road is such that the application site is central to views towards the village. In addition, the development proposal would extend the village right up to the A370 making it far more apparent to public view, eroding the character of the countryside as appreciated from this point.

North Somerset Council is committed to achieving high quality buildings and places across North Somerset, in particular to support comprehensive regeneration at Weston-super-Mare. High quality architecture and urban design will be sought from development demonstrating a robust design process to generate solutions that have clearly considered the existing context, and contribute to social, economic and environmental sustainability. As part of a comprehensive place-making strategy new development should function well, supporting sustainable land uses and seek to improve the image of the area. Poor design standards in individual buildings and larger schemes are not acceptable. The submitted layout is considered to be poorly integrated with the village but is indicative only and it is possible that at a detailed stage that this could be improved; thus whilst it may be contrary to Policy DM32 also this is not proposed to be identified as a specific refusal reason.

Despite the comments from the agent, the development in this location will not make a positive contribution to the quality of the local environment. Overall, the development of the

site for housing will conflict with landscape objectives in policies CS5 and CS12 of the Core Strategy, and DM10 of the Sites and Policies Plan.

Issue: 3 Transport & Access

Policy DM24 of the Sites and Policies Plan provide the framework where development will only be permitted if it would not prejudice highways safety and the site can be readily integrated with public transport, cycleway and footpath links. Development giving rise to a significant number of travel movements will only be refused on transport grounds if it is likely to have severe residual cumulative impact on traffic congestion or on the character of the surrounding area.

Access

Three points of vehicle access are proposed to the site:

1) A new priority junction with Bridgwater Road (to the south of the site). The junction would include a right-turn ghost island.

The section of Bridgwater Road which bounds the site to the south is subject to a 60mph speed limit. It is noted within the Transport Assessment that visibility at the proposed site access junction with Bridgwater Road exceeds that required by DMRB (9.0m by 215m), however, this is not demonstrated on the junction design drawing. Furthermore, no speed survey was conducted on Bridgwater Road to inform the design.

The proposals would introduce another priority junction onto Bridgwater Road, near two existing priority junctions (Bleadon Road and Bridge Road). There is no assessment included within the Transport Assessment of the likely safety implications of this, nor has consideration been given to the potential for closure of one of the existing roads to traffic and enhancing connections between Bridgwater Road and Bleadon village for sustainable users such as pedestrians and cyclists.

2) A new priority junction with Bleadon Road (to the north of the site).

The Transport Assessment does not include a junction design drawing for the proposed priority junction with Bleadon Road to the north of the site. A speed survey was conducted on Bleadon Road and has shown that the 85th percentile speed of westbound routing traffic exceeds the current 30mph speed limit by 6mph (36mph result). It is not clear whether appropriate visibility onto Bleadon Road can be achieved at this junction and no consideration is given to the likely safety implications or mitigation needed, resulting from additional traffic using Bleadon Road, especially considering the high speeds that vehicles currently travel along this road.

Having regard to the location of the site, the existing speeds recorded along Bleadon Road, and the intensification of use of Bleadon Road, consideration should be given to the provision of traffic calming measures to reduce traffic speeds near the proposed site access. It is essential that further detail is provided as part of any reserved matters application which demonstrates that safe means of access can be achieved from Bleadon Road.

3) A retained existing priority with Bleadon Road (to the northeast of the site).

The existing vehicle access from Bleadon Road at the northeast of the site currently takes the form an informal field access (which crosses an existing waterway). The Transport Assessment does not include a junction design drawing for the existing junction, or any

detail of geometry, visibility and footways. It is likely that the existing access would need significant upgrading if it is to serve the development.

The Transport Assessment assumes that 86.3% of all development traffic (62 vehicles) would turn right out of the site and travel north-westbound on Bridgewater Road towards Oldmixon and Weston-Super-Mare in the AM peak hour. To do so, vehicles exiting the site would have to conduct a right-turn manoeuvre, passing over the opposing 60mph carriageway. In the absence of any speed surveys and / or road safety audits, there are concerns that those turning right from the site could have a detrimental effect on road safety along Bridgewater Road contrary to Policy DM24.

Trip Generation and Distribution

The multi-modal trip rates used to calculate the trip generation for the proposed 200 residential units are not considered robust and do not reflect of the site's rural setting. The residential trip generation presented in Transport Assessment predicts that there will be 58 & 38 two-way pedestrian trips in the AM and PM peak hours, respectively. This is considered overestimated, as there are limited amenities and employment opportunities within walking distance of the site. This is further compounded by the fact that the existing footway provision near the site is poor.

In addition, there will be 141 & 130 two-way vehicle occupant trips in the AM and PM peak respectively. This is considered to be an overestimate, especially when compared to the single vehicular trips which are estimated as 102 trips in the AM peak hour and 104 in the PM peak hour. The vehicle trip rates are considered low, especially given the sites rural setting and likelihood for future residents to drive. Whilst the Transport Assessment trip generation assumes between 34% (AM peak hour) and 35% (PM peak hour) of trips would be undertaken by those driving a car, the 2011 Census journey to work data demonstrates that 84% of local residents currently drive. Taking this into consideration, the vehicle trip rates and resultant trip generation presented in the Transport Assessment for the residential uses is not accurate and should be revised.

Health Centre & Local Shop Trip Generation

Tables 4.2 and 4.3 of the Transport Assessment include a separate trip generation assessment for the proposed Health Centre and Local Shops. Similar to the residential trip assessment, the trip rates for both land uses imply there would be a greater number of vehicle occupant trips than single vehicle trips. This is considered unrealistic.

Table 4.4 of the Transport Assessment assumes that all trips generated by the proposed Health Centre and Local Shops would be internal to the site. Whilst it is agreed that most trips generated by the proposed Local Shops would be internal, this would unlikely be the case for the Health Centre (where a proportion of trips could come from the wider area).

Office Trip Generation

No specific reference is made in the Transport Assessment to the proposed office / employment uses which are indicated on the application form.

It is not clear from the Transport Assessment whether there would be any additional trips generated by the proposed office / employment uses on the site. Section 11 of the Planning Application Form (contained on the Planning Portal) identifies that there will be a total of 96 employees at the site. It is not clear what proportion, if not all of these, would be associated with the office / employment uses, and how they would travel to and from the site.

Vehicle Distribution

The Transport Assessment indicates that vehicle distribution onto the local highway network has been calculated using 2011 Census data. Whilst this is a generally accepted approach for calculating vehicle distribution for developments of this nature, no further detail is provided of the actual calculations / methodology undertaken to reach the distribution figures presented. The distribution for the site assumes that 96.4% of traffic will route via the proposed site access junction onto the Bridgwater Road and 3.4% of traffic will route via the proposed site access junction with Bleadon Road. Further detail is required of the calculations / methodology undertaken to reach these figures.

Traffic Impact Assessments

Presently the assessments included in the Transport Assessment are incomplete having regard to the development mix set out for the site (as specified by the application form).

An operational assessment of the proposed site access junction onto Bridgwater Road is included within the Transport Assessment. Whilst the assessment demonstrates that the proposed site access junction could accommodate the traffic associated with development proposals, further consideration is needed considering the comments raised regarding trip generation and distribution (see above) (namely the proportion of vehicle trips generated by the site, the lack of consideration of office trips, and the proposed distribution methodology which is unclear).

Given that the site is located to the immediate south of Bleadon village, no consideration has been given to the likely cumulative impacts of existing village traffic also using the site access road to reach Bridgewater Road.

No consideration is given to committed development traffic flows and the likely cumulative impacts alongside the development proposals on the local highway network.

The Transport assessment indicates that 86.3% of all development traffic (62 vehicles in the AM peak hour) would turn right out of the site and travel north-westbound on Bridgewater Road towards Oldmixon and Weston-Super-Mare. No consideration has been given to the impacts of this additional traffic at the existing Bridgwater Road / Bleadon Hill / Uphill Road South priority crossroads junction or at the existing Bridgwater Road / Broadway / Grange Road four-arm roundabout to the northwest of the site (which are known to experience congestion during the peak hours).

Parking

The Transport Assessment or Masterplan makes no reference to car or cycle parking provision and / or no reference as to whether these would be provided in line with North Somerset Council parking standards.

Site Layout

The Transport Assessment and/or Masterplan make no reference to the following:

(1) The proposed pedestrian and cycle access strategy for the site – and how the development would link into existing footways provided along the periphery, existing bus stops and also integrate with Bleadon village to the north.

(2) The proposed refuse collection strategy.

(3) Whether the proposed vehicle access junctions from Bridgewater Road and Bleadon Road are suitable to accommodate a refuse vehicle / emergency vehicle / servicing vehicle. Swept path analysis would be required to support this. Details regarding the internal vehicle and pedestrian access strategy (i.e. routing, road widths etc) are required, including what the proposed existing access located at the northeast of the site, from Bleadon Road, would be used for, and whether it is suitable to serve the site from a design perspective.

(5) Further details of likely TRO's are required to support the proposals. For example, the Transport Assessment (paragraph 2.27) alludes to the fact that existing residents parking along Bridge Road will be accommodated within the site – however, no further detail is provided of this (including measures to restrict future parking along Bridge Road and Bleadon Road).

Walking and Cycling

The Transport Assessment includes no clear pedestrian and cycle access strategy for the development. Taking into consideration the existing intermittent footways located along the northern side of Bleadon Way and also the continuous footway located on the southern side of Bridgewater Road, existing provision for pedestrians in the vicinity of the site is generally considered to be poor.

The proposals do not identify any improvements to the existing infrastructure to accommodate future pedestrian movements associated with the development. Although the masterplan identifies potential pedestrian access points onto Bleadon Road and Bridge Road, no further detail is provided of how pedestrians would continue their journey outside of the site (especially where there are currently no footways provided along Bridge Road where it is proposed to provide two new pedestrian access points).

It is not clear from the Transport Assessment how the proposals would *'enhance safety and convenience of access to the A370 northbound bus stop for residents of the proposed development and existing residents of Bleadon'*. Further clarity is required on this point.

The Transport Assessment does not provide any details of existing or proposed cycle infrastructure (albeit it refers to it being discussed in earlier chapters of the report in the policy chapter (6)).

The proposals do not conform to local policy requirements in that it is not demonstrated that they are accessible by sustainable modes of travel. The site would in effect become an extension to Bleadon village to the immediate north, and for this reason it is imperative that, from a sustainable transport perspective, the Transport Assessment demonstrates how the development integrates with the neighbouring village which it fails to do satisfactorily.

Public Transport

The Transport Assessment recognises that there are existing bus services available in the vicinity of the site, with the nearest being located within 10m, 420m and 900m. The 'Institute of Highways and Transportation – Suggested Acceptable Walking Distances' identifies 400m as an acceptable walk distance to local bus stops. Whilst the nearest stated bus stop (10m) is located within this threshold, the remaining two bus stops (420m and 900m) bus stops are located outside of this threshold.

Taking the above into account, it is considered that the site is not well served by local bus services. Furthermore, the applicant's bus service summary is no longer correct as there has recently been a significant reduction in bus service provision. One of the main routes detailed service 4A linking Bleadon village to the town centre has been withdrawn and the service replaced by a much less frequent community transport service. The bus route service 20 from Burnham-on-Sea to Weston-s-Mare operates a much-reduced frequency in the winter months from October to April whereas the summer timetable is the only one referenced.

Accessibility

Although the Transport Assessment includes a high-level review of existing and proposed facilities and amenities no reference is made as to how these facilities would be reached on foot and/or by bike. For example, the proposed facilities are isolated from the village core and it is not clear whether the facilities and amenities fall within the acceptable walking and cycling distances and no reference is made to the proximity of the site to local nurseries and schools, health care facilities, and employment opportunities, and whether these are accessible on means other than the car.

Residential Travel Plan

A Green Travel Plan has been prepared in conjunction with the Transport Assessment. Owing to the sites rural location, and subsequent poor existing sustainable transport infrastructure, future residents are highly likely to travel via private car as opposed to using sustainable modes of travel. The Transport Assessment includes no clear pedestrian, cycle and public transport access strategy. In this respect the development is considered contrary to national (NPPF) and local policy objectives.

In light of the above, and given the scale of the proposals (200 new homes), an Interim Residential Travel Plan would be required to be prepared to an agreed scope, including:

- Existing site-specific barriers or issues for residents using sustainable travel; number of trips expected to be generated – this has already been generated through TRICS (although it would need revising in light of the comments raised above); objectives and targets; management and implementation strategy; measures to encourage the shift from single occupancy car use, in favour of: walking, cycling, public transport and car sharing; details of who will be responsible for carrying out the monitoring of the Residential Travel Plan and Action Plan.

• The Residential Travel Plan will apply to all transport related movements and issues generated from the development.

Should the application be approved, there will be a required contribution of £120 per dwelling) towards Travel Information Packs, public transport taster tickets and cycle vouchers, to ensure that the development maximizes sustainable transport. Funding might also be required to improve bus services at the weekends particularly in the winter months when service provision is poor. Currently the cost to provide bus services to make some worthwhile improvements to the existing network is estimated at £20-30K per annum. It is acknowledged that if the development was fully built out revenue on public transport might be expected to increase and the subsidy to support bus services would therefore decrease.

Consideration would also need to be given to how future employees and visitors to the proposed Health Centre, Doctors Surgery, retail outlets and office/employment spaces would be encouraged to travel via sustainable modes of travel.

Overall, the application has failed to demonstrate that the development is accessible via sustainable modes of travel (foot, cycle and public transport). Nor has the applicant demonstrated that the development fully integrates with Bleadon village. The information provided in the Transport Assessment relating to trip generation and distribution, vehicle access, safety, and highway operation is incomplete. The proposal is therefore contrary to Policy DM24.

Issue: 4 Flood Risk and Drainage

Policies CS3 of the Core Strategy and DM1 of the Sites and Policies DPD seek to ensure that new development does not create problems in terms of flood risk. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.

The application site is located within Flood Zone 2, and as such, is subject to the Sequential Test. A Sequential Test is required to demonstrate that the development cannot be accommodated appropriately on land at a lower risk of flooding. In relation to the Exception Test, para. 3.45 of the Core Strategy recognises that climate change could result in Flood Zone 2 land becoming Flood Zone 3 in the longer term. The Core Strategy considers that in some circumstances, such as large parts of Bleadon, Flood Zone 2 should be treated as Flood Zone 3a for long-term planning purposes, though not for development management purposes. The NPPF in paragraphs 155 to 160 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future) and that a sequential approach should be used in areas known to be at risk now or in the future. It is the applicant's responsibility to assemble the relevant evidence in order to allow the LPA to consider whether the Sequential Test is satisfied. This evidence should have been submitted with the planning application to demonstrate that there are no reasonably available alternative sites within an area of lower flood risk which can accommodate the proposal. The applicant has failed to provide information that there are no reasonably alternative sites available in areas of lower flood risk. Overall, in formally applying the Sequential Test it is the LPA's view that there are reasonably alternative sites in the Weston super Mare area that are of lower flood risk than the application site.

To pass the Exception Test, it must be shown that the proposed development will:

- i) provide wider sustainability benefits to the community that outweigh flood risk, and;
- ii) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. In relation to the Exception Test, the updated FRA includes evidence to show that the development provides wider sustainability benefits to the area that outweigh flood risk and will be safe for its lifetime without increasing flood risk elsewhere.

In the context of development proposals "sustainability benefits" are likely include environmental, social or economic factors, or some combination of these. In order to pass the Exception Test the development must provide sustainability benefits beyond the application site, for the community such as providing affordable housing to meet an identified local need, removing pollution, assisting in the regeneration of the area, visually enhancing the site to the benefit of the character of an area and relocating an existing use closer to public transport thus reducing the amount of traffic on the road.

Such wider benefits will not be achieved by this development, certainly not wider benefits that will outweigh the flood risk.

The applicant's Flood Risk Assessment considers that fluvial flood risk is low, even allowing for climate change, but makes little comment on tidal flood risk. Of the two types, it is tidal risk that is the closer to the site. In addition, the FRA fails to take account of reported flooding incidents along Bleadon Road which, given the site location could be either exacerbated or improved upon by the scheme.

In terms of flood risk, the applicant has suggested that during a tidal climate change event, the existing flood defences on the River Axe could be overtopped or breached and the site could potentially flood to depths of 765 – 965mm. As a result, the applicant has proposed the following mitigation measures in the updated FRA:

- No ground floor sleeping accommodation
- Ground floors to be floodable. Flood resilient construction measures to be incorporated into dwellings.
- Inclusion of a flood warning and evacuation plan

The inclusion of these significant mitigation measures is evidence that this is not a suitable location for housing and that such development should be directed away from areas at high risk

The submitted drainage details seeks to reduce existing flood risk elsewhere through the implementation of a sustainable surface water drainage strategy. The details of this strategy are presented within an updated FRA and suggests the development discharge rates to the existing rhyme system are less than the prevailing greenfield discharge rates from the undeveloped site for storms up to the 1:100 year + 40% event.

Run-off rates and proposed discharges from the site have been taken as the existing greenfield run-off figures. Unfortunately, the proposed drainage strategy only seeks to mimic run-off rates and not volumes. All proposed surface water drainage should ensure that Long Term Storage is suitably provided to confirm that flood volumes downstream are not increased.

The proposed strategy also relies on utilising the existing rhyme network with some modifications. At this point, few details of the proposed changes in terms of geometry and other such design measures are included within the FRA. Given the proposed site layout, it is likely that source control features such as roadside swales and permeable paving subject to appropriate infiltration rates can be accommodated which will both improve the scheme in terms of sustainable drainage principles but also potentially reduce the need for overly deep drainage.

In conclusion, the Local Planning Authority (LPA) are not satisfied the requirements of the Sequential Test and Exceptions tests as set out in the National Planning Policy Framework (NPPF) and as required by Policy CS3 of the Core Strategy and Policy DM1 of the Sites and Policies DPD have been met.

Issue; 5 Impact on living conditions of neighbouring residential occupiers

The planning application is in 'outline' where the siting, design and landscaping will be considered at a later stage. Nevertheless, the site adjoins a number of residential properties to the north of Bleadon Road and any proposed layout, if approved, should reflect the existing grain and scale of development in this part of the village.

Issue: 6 Archaeology

Policy CS5 of the North Somerset Core Strategy states that the council will conserve the historic environment of North Somerset, having regard to the significance of heritage assets such as Scheduled Monuments and other archaeological sites.

Policy DM6 of the North Somerset Sites and Policies Plan (Part 1) states that archaeological interests will be fully taken into account when determining planning applications and sets out criteria for evaluation, preservation and protection.

Policy DM7 of the North Somerset Sites and Policies Plan (Part 1) states that when considering proposals involving non-designated heritage assets the Council will take into account their local significance and whether they warrant protection where possible from removal or inappropriate change including harm to their setting. National policy guidance in the National Planning Policy Framework is consistent with the above and states that great weight should be given to conservation.

The proposed development is located within an area historically characterised as post-medieval (18th-19th century) parliamentary enclosure or reclamation of inland peat moors and common. Little is known of the prehistoric period in this area, although the nearest dryland area in Bleadon has produced abundant evidence of late prehistoric material including field systems and (probably) ritualised burials. Immediately north of the proposed development is evidence of prehistoric occupation and burials at Whitegate Farm, as well as evidence of medieval buildings just south of Whitegate Farm.

The geology of proposed development area consists of bedrock of Mercia Mudstone with overlying tidal deposits of clay, silt and sand. A sinuous palaeo-channel appears to cross the eastern end of the proposed development area, and this may have some potential for the preservation of organic materials or palaeo-environmental evidence not seen in drier areas.

The submitted Design & Access Statement considers Policy CS5 but does not address any aspects of the historic environment that this development may impact upon, only landscape elements. An archaeological desk-based assessment will be required to assess the archaeological potential of the proposed development site, and further investigation in the form of geophysical survey and evaluation will likely be required in line with paragraph 189 of the NPPF, and policies DM6 and DM7 of the North Somerset Sites and Policies Plan Part 1.

Issue: 7 Ecology

The NPPF at paragraph 175 puts in place the framework for assessing development proposals. This includes reference to minimising impact to biodiversity and ensuring that Local Planning Authorities give appropriate weight to statutory and non-statutory conservation designations, protected species, and biodiversity. This includes a requirement to mitigate the impacts of the development in accordance with Policy CS4 of the Core Strategy and DM8 of the Sites and Policies Plan.

The applicant, during the process of the application, is continuing to carry out the further ecology surveys, although these will not be prepared in a reasonable timeframe due to seasonal requirements. The applicant is therefore relying on the ecology assessments submitted.

The applicant has therefore failed to provide adequate ecological survey information to fully inform this application. This is required to demonstrate compliance with the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species

Regulations 2017. The presence of protected species is a material consideration within schemes and, as suggested by Natural England standing advice, ODPM Circular 06/2005 and Case Law surveys should not be left to be addressed through conditions.

Great Crested Newt

There are records of great crested newt (GCN) within 1km and a wet ditch at the site was determined to be suitable habitat for the species. There is also a pond 190m north which has not been identified by the ecological consultants and should also be considered. The recommended eDNA survey results, plus a population class assessment and mitigation strategy if GCN are found to be present needs to be provided. Ponds to the south of the River Axe and Bridgwater Road can be scoped out.

Bats

Bat activity surveys have not been completed. The justification provided for this is the retention of 6m grassland strips along with watercourses and hedgerow boundaries. However, these will be severed in several places by roads and pedestrian paths. Based on the indicative layout and without further evidence, it does not appear feasible that boundary habitats could be maintained at light levels of below 0.5 lux which would be required to maintain dark flight corridors for light-sensitive bats such as horseshoe species. In addition, a significant amount of potential foraging habitat will be lost. The retained margins would be insufficient compensation if grassland habitats are used by foraging bats including horseshoe species. There are lesser horseshoe bat records within 1km, and maternity roosts are present at Uphill at Banwell.

Reptiles and Hazel Dormice

If reptiles are reasonably likely to be present and impacted, a presence/absence survey will need to be completed in accordance with best practice guidance. The location of a reptile Receptor Site if required would be a material consideration in the scheme design. If more than 10m sections of hedgerows will be removed or significantly impacted, a hazel dormouse survey would be required.

The proposals meet the criteria for consultation with Natural England in relation to Purn Hill Site of Special Scientific Interest (SSSI), based on their Impact Risk Zones and therefore Natural England needs to be contacted and their comments made available to the planning authority.

All sites should achieve net ecological gain to meet the NPPF, UK Government 25 Year Environment Plan and NSC policies including policy CS4 of the North Somerset Core Strategy and policy DM8 of the North Somerset Sites and Policies Plan (Part 1). Ecological enhancement will need to be secured by condition. The recommendations by the ecological consultants are welcomed and should also include connectivity measures for hedgehog and designing new watercourses to be beneficial to wildlife. In-built bat and bird boxes are preferable if possible due to easier long-term maintenance.

The recommendation for a Construction Environmental Management Plan (CEMP) and Landscape and Ecological Management Plan (LEMP) are welcomed but need to be informed by a sufficient baseline assessment of the scheme.

Issue: 8 Other Matters

Sustainable Construction

Policy CS2 of the Core Strategy requires development to be of a good standard of design

and include sustainable construction techniques with high levels of energy saving. This can be addressed by condition if approval were to be granted.

Waste storage

New dwellings must be provided with sufficient space for a waste storage area and collection point. This would need to be addressed at reserved matters stage if approved.

Crime Prevention

At this stage where only outline planning is sought, it is difficult to give detailed comments as the areas to be addressed as detailed design would normally be decided upon at reserved matters stage and any layout plans submitted at this stage are only indicative.

Planning and CIL Obligations

North Somerset Council has adopted a Community Infrastructure Levy (CIL) for which this scheme will be liable.

There will be a required contribution of £120 per dwelling) towards Travel Information Packs, public transport taster tickets and cycle vouchers, to ensure that the development maximizes sustainable transport. Funding might also be required to improve bus services at the weekends particularly in the winter months when service provision is poor.

Housing

Policy CS16 of the Core Strategy requires that on-site affordable housing provision is made to meet local needs on all residential developments of 11 dwellings or more (or on sites of 0.3 hectare or above. This application proposes 200 dwellings and therefore the affordable housing requirement is 60 units. If the total number of dwellings change during the planning application process, then the required amount of affordable housing will change according to the revised number of dwellings.

The Council will only accept a lower affordable housing contribution if the economics of provision are such that the provision of affordable housing renders the development economically unviable. In this circumstance, the Council or an independent expert employed by the Council, would undertake a full review (funded by the developer) of the development costs and projected sales values in order to determine the level of provision that may be sought from the developer. There are a number of other more detailed requirements associated with affordable housing that would be reflected in the terms of any agreement, including being indistinguishable from market housing in terms of appearance; compliance with development standards as per the Sites and Policies Part 1 Policy DM42, part M4(2) of the Building Regulations, and 10% of the affordable units to be built to constructed part M4(3) of the Building Regulations (Wheelchair Accessible). There will also be detailed requirements relating to transfer to a HARP, the Council having 100% nomination rights to the affordable housing units on all lettings and enabling fees being payable on each unit and the initial share of properties and limitations on the rental element of a maximum annual rent equivalent to 1% of the equity retained by the HARP (excluding reasonable service charging). In the event that shared ownership occupiers staircase to 100%, the capital receipt should be reinvested into enabling affordable housing in the administrative area of the Council.

Conclusion

In terms of the planning balance the proposal is in the open countryside and is contrary to Policy CS33. Notwithstanding the inability of the council to currently demonstrate a five-year supply of deliverable housing sites, the titled balance referred to in the NPPF does not apply. There would be significant harm to the character of the Bleadon Moor landscape

character area and to the appearance and visual appreciation of the area contrary to Policies CS5, and 12 and DM10. Thirdly, Bleadon is a small infill village that has only a basic range of services and facilities and is not therefore a sustainable location for growth of the scale envisaged. It is inevitable that the new residents will be reliant on the car for access to retailing, leisure employment, other services and facilities and therefore the decision to limit residential development in the village is reflected in the Site Allocations Plan.

These are strong reasons to justify refusing planning permission for development in an unsustainable countryside location. The presumption to approve sustainable development only occurs where it is deemed a site is sustainable as identified through the NPPF and NPPG. The applicant has failed to provide sufficient or adequate information in the transport assessment to inform this major application, and as a result fails to comply with the key objectives of sustainability development. The site is not considered to be a location that would enhance or maintain the vitality of Bleadon and therefore the proposed development should not be supported. In addition, it is considered that the proposal would be detrimental to highway safety contrary to Policies CS32 and DM24

The application site is located within Flood Zone 2 and is likely to be at risk of flooding. The applicant has failed to provide sufficient flood risk information and fails the Sequential and Exceptions tests and therefore the development is contrary to policy CS3 of the North Somerset Core Strategy, policy DM1 of the Development Management Policies (Part 1) and the flood risk objectives in the NPPF.

The applicant has also failed to provide sufficient ecological survey information sufficient to assess the impacts of the development on local wildlife. The development is therefore contrary to Policy CS4 of the Core Strategy and DM8 of the Sites and Policies Plan.

There is, therefore, resultant conflict with a range of policies in the development plan and these matters carry significant weight against the proposal.

Recommendation

REFUSE (see draft decision for reasons)

Reason for Overriding Parish Council comments (if appropriate)

n/a

In recommending this application, I have taken into consideration the relevant policies of the Development Plan and the comments made by the consultees and other interested parties and the:

- Natural Environment and Rural Communities (NERC) Act 2006
- Crime and Disorder Act 1998
- Human Rights Act 1998.

Signed: David Tate