

12 December 2018

Planning Policy
North Somerset District Council
Town Hall
Walliscote Grove Road
Weston-Super-Mare
BS23 1UJ

Dear Sir/Madam,

Church Commissioners for England – Local Plan 2036 Issues and Options Consultation Representations

We write on behalf of our client the Church Commissioners for England (“the Commissioners”), who are long-term landowners in the North Somerset Area. The Commissioners own considerable landholdings across the country and manage a well-diversified investment portfolio to support this. We understand that North Somerset District Council (“the Council”) is inviting responses to its Local Plan 2036 Issues and Options document (“Issues and Options”).

The new Local Plan is being prepared to plan for North Somerset to 2036 and will provide the detailed policies and land allocations including detailed policies on the strategic developments at Nailsea, Backwell, Churchill and Banwell, which have been allocated in the West of England Joint Spatial Plan (JSP). The Commissioners first submitted representations to the Council’s Generating Ideas consultation on 13 April 2018.

The Commissioners recognise the Councils’ extensive efforts in producing its Issues and Options and support its aims in producing a new Local Plan to support the implementation of the JSP. We understand that the purpose of the Issues and Options document is to identify the issues which need to be addressed in the emerging North Somerset Local Plan and to receive initial feedback on a range of planning issues, including; local housing growth; settlement boundary reviews; and, the National Planning Policy Framework 2018 (the “NPPF”) requirement for small scale sites of 1 ha or less.

The Commissioners support the Councils request for feedback on its Issues and Options and are pleased to be given the opportunity to comment. The Commissioners generally support the allocation of strategic land within the JSP and the aims of the emerging Local Plan to 2036. The Commissioners would, however, like to ensure that the proposed strategic sites do not become the main focus of the new Local Plan 2036 and that the value of enabling smaller scale developments is also recognised, either through reviewing existing settlement boundaries, or small scale housing allocations.

The Commissioners own the following site in North Somerset:

- Land off the Veale, Bleadon (“the Site”)

In support of these representations, please also find the following included within submitted representation pack:

- Site location plan
- Illustrative plan, prepared by TFQ Architects

- Indicative Ecological Mitigation Plan, prepared by The Ecology Partnership
- Phase 1 Habitat Survey, prepared by The Ecology Partnership
- Reptile Survey, prepared by The Ecology Partnership
- Bat Survey, prepared by The Ecology Partnership

The Veale, Bleadon



Source: Google Maps

The Site is an infill plot located within the built up area of the village of Bleadon, although it sits outside the Bleadon settlement boundary. It is used for grazing horses and lies approximately 4 miles from the centre of Weston-Super-Mare. The Site is bounded on its northern, eastern and western boundaries by existing housing, and its southern boundary is bounded by a woodland strip which is designated as a Local Wildlife Site. The Site rises to the southern boundary towards the existing tree line.

The surrounding area is typified by residential dwellings, which make up the bulk of the settlement of Bleadon. Employment uses in the Village include a concrete paving manufacturer, a flooring contractor, holiday accommodation and agricultural farming operations. Local amenities in Bleadon include the Queens Arms pub and Murco petrol station. Weston General Hospital is located 2.3 miles north-west of the Site and Oldmixon Primary School is located 3 miles to the north of the Site.

The Site is not located within a conservation area and there are no listed buildings within close proximity to the Site.

Settlement Boundary Review

The Commissioners support the Council's commitment within its Issues and Options document to review the Bleadon settlement boundary as part of ongoing development of the emerging Local Plan. The document confirms that a review of the boundaries will be initiated to assess how development needs up to 2036 would be addressed through the Local Plan.

The Commissioners submitted a request for pre-application advice in October 2017. The Officers response noted the Site's location outside of the Bleadon settlement boundary and the restrictions this places on its development. This was the primary focus of the Council's pre-application response due to Core Strategy 2006-2026 Policies CS14 'Distribution of New Housing' and 'CS33 Infill Villages, Smaller Settlements and Countryside' restricting development in the designated Infill Villages to that which is within the settlement boundary.

The Commissioners strongly urge the Council to develop its Local Plan Policy in line with Option 1 'Adjust settlement boundaries to include new allocations within the boundaries and retain the current policy which allows sites to come forward adjacent to boundary'. Option 1 helps meets the government's pro-growth

agenda as it allocates sites plus incorporates flexibility for other sites to come forward at a time when there is a significant under supply of housing. The Council should allow some flexibility for new development adjacent to settlement boundaries in Infill Villages where it can be demonstrated that the site is sustainable to ensure that new development can be considered appropriately on a case by case basis. This will avoid discounting sustainable development through restrictive Local Plan policies.

The Commissioners consider that there should be flexibility within the emerging Local Plan to enable appropriate sustainable small scale development sites such as in Bleadon, across the whole of the Council's settlement hierarchy. This Policy is particularly restrictive for Infill Villages such as Bleadon and is preventing suitable, sustainable, high quality development from coming forward.

Requirement for Small Scale Sites

The Commissioners are pleased to note that the Councils' Issues and Options document correctly identifies that Paragraph 68 of the revised National Planning Policy Framework (the 'NPPF') (published July 2018) requires that at least 10% of all sites identified for housing in Local Plans are 1 ha or less. As noted in the NPPF, small-scale sites can make an important contribution to meeting the housing requirement of an area whilst also benefiting from being able to be built out quickly. There is an increasing acceptance amongst LPA's that to maintain a five year supply there is difficulty in relying on larger and longer term developments. Therefore, the Commissioners request that the Council acknowledges the small scale site requirements of the NPPF within the new Local Plan, and sets out the benefits of smaller sites in helping maintain a five year housing land supply.

The revised NPPF and the Housing White Paper – "Fixing our Broken Housing Market" recognise that small sites create opportunities for developers and will help meet rural housing needs which are sensitive to their setting. One of the key aims of the Government is to diversify the housing market and open it up to smaller builders who will naturally focus on smaller sites. Smaller sites can make a valuable contribution to housing numbers and can be well designed to be in keeping with the surrounding area.

The Commissioners understand that the Council does not currently have a demonstrable five year housing land supply (September 2018 Appeal, Ref. APP/D0121/W/18/3200907). The Site is available to develop immediately and can make a valuable contribution to the Council's objectively assessed housing need. It is entirely within the ownership of the Commissioners and is capable of being brought forward quickly to assist in the delivery of new housing for the district if the settlement boundary is reviewed to amend Bleadon's built-up envelope to include the Site.

Ecology

A key issue with the Site is its allocation as a Local Wildlife Site. This has prevented the Site being allocated in the past and was raised as a potential issue during previous pre-application discussions.

The Commissioners received pre-application advice in relation to the Site in January 2017. The response concluded that the ecologically sensitive south of the Site was required to be protected and that a net biodiversity gain would need to be demonstrated. To accommodate ecological mitigation and enhancements of the Site the Commissioners reduced the number of dwellings to accommodate the mitigation buffer on the Site's southern boundary. The Commissioners have since undertaken further ecological survey work at the Site which demonstrates that impacts on the Local Wildlife Site can be mitigated and that a suitable buffer can be incorporated and confirm that a biodiversity net gain for the Site is achievable.

Suitability

It should be noted yet that the Commissioners are actively working towards bringing the Site forward for development. It is located within a sustainable location which abuts the settlement boundary. It is protected by heavy screening to the south of the site and residential units to the north, east and west. The majority of

Bleadon's local amenities are located within Bleadon's central and eastern extent, and as such, it is the most sustainable plot in the Village for new residential development.

The Site is approximately 0.9ha and can accommodate at least 12 dwellings, which will assist in the delivery of new homes for the Council.

The Commissioners have undertaken a number of surveys to demonstrate that the Site is suitable for development.

The accompanying reports confirm that the Site is suitable for a sensitive residential development of approximately 12 units. Any future residential development of the Site should be positioned to reflect the layout of the surrounding existing dwellings to ensure that the overall layout and design responds positively to local context and character of the area. Initial feasibility studies to determine the development capacity of the Site demonstrate that it has capacity for 20 residential dwellings, however, once the requirement for ecological mitigation is taken into account this is reduced to 12 units, shown on the accompanying Mitigation Plan.

Transport

An access appraisal has been undertaken by Icen Projects Ltd. which confirms that suitable access to the Site can be provided by extending the existing access from the Veale. This was confirmed in the pre-application response.

Conclusion

The Commissioners are pleased to have the opportunity to provide comments in relation to the North Somerset Local Plan Issues and Options 2036 consultation. The Commissioners are supportive of the key principles of the document and would request that the Council consider that Bleadon settlement boundary be extended to include the Site so it can forward as a sensitive residential development. The Site would make a valuable contribution to the supply of housing in the district and help deliver on the Council's requirement, under the NPPF, to achieve 10% of its housing allocations on sites of 1ha or less. The accompanying surveys demonstrate that the proposed land use would be designed to not give rise to any ecological and residential amenity issues and would be an appropriate use in the existing settlement, with suitable access.

Should you have any queries on this correspondence, please contact myself or Jonathan Hoban on 020 7936 3000 or jhoban@deloitte.co.uk

Yours sincerely



Caroline McDade
For Deloitte LLP