

22 April 2020

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

Dear Sir/Madam,

North Somerset Council Local Plan: Pre-Commencement Document Consultation Representations of behalf of the Church Commissioners for England

We write on behalf of our client, the Church Commissioners for England ('the Church Commissioners'), who manage a well-diversified investment portfolio to support their work across the country. We understand that North Somerset Council ('the Council') has withdrawn from the West of England Joint Spatial Plan ('JSP'), a joint statutory development plan covering the four authorities of Bristol, Bath, North East Somerset and South Gloucestershire. As such, the Council are currently preparing a new Local Plan for North Somerset covering strategic and non-strategic policies for the period 2023-2038.

The Church Commissioners recognise the Council's efforts in preparing the new Local Plan and are pleased to be given the opportunity to comment on the following documents which are being consulted on:

- North Somerset Local Plan: Pre-commencement Document
- Local Development Scheme
- PAS Toolkit: Part 1
- Sustainability Appraisal Scoping Report

Background

The Church Commissioners previously responded to the Local Plan 2036 Issues and Options document, based on the strategic context set out in the JSP, in December 2018 and the Council's Generating Ideas consultation on 13 April 2018.

The Church Commissioners supported the aims of the emerging plan, although requested that strategic sites did not become the main focus of the plan and that the value of enabling smaller scale developments was also recognised, either through reviewing existing settlement boundaries, or small scale housing allocations. The Commissioners promoted a site which they wholly own, known as Land off the Veale, Bleadon ('the Site'), to be allocated for residential development within the emerging plan.

Much of the evidence and feedback from this consultation remains relevant to the New Local Plan. The Church Commissioners understand however, that withdrawal from the JSP allows for a new approach.

Site

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. A Local Wildlife Site (LWS) designation, which is a non-statutory designation to safeguard wildlife sites, covers the entirety of the Site and extends beyond the southern boundary. The LWS classification is a local site designation therefore, it does not imply any legal or statutory status and instead relies upon sympathetic management for their conservation. The Site rises to the southern boundary towards the existing tree line.



Figure 1 The Veale (Source: Google Maps)

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.

Planning History

The Church Commissioners submitted a request for pre-application advice in October 2017 to seek the Council's advice regarding the proposed development of approximately 12 dwellings at the Site.

In response to the pre-application advice request, the Council raised the following main planning issues:

- The impact of development on the Local Wildlife Site and whether this can be mitigated; and

- Whether the scheme is compliant with Policy CS33 of the North Somerset Core Strategy.

Historically, as the Site falls wholly within a LWS (South Hill), the potential ecological impacts of development has previously prevented the Council from allocating the Site. Despite this, the pre-application response from the Council accepted that the Site is able to deliver ecological enhancements and has the potential to ensure a biodiversity net gain, over the partial loss of the LWS at the northern extent of the Site.

In terms of the latter point, currently the Site is outside the settlement boundary for Bleadon and therefore, development would be contrary to Policy CS33 'Infill Villages, Smaller Settlements and Countryside'. There was recognition from the Council that the policy was restrictive and they advised, in their pre-application response, that the Church Commissioners should continue to engage in the Development Plan process to promote the potential development of the Site. The Council also advised to engage with Bleadon Parish Council for consideration in their Neighbourhood Plan.

Since this pre-application advice, the Church Commissioners have continued to engage in the Development Plan process. There has been ongoing engagement between Bleadon Parish Council and the Church Commissioners which has revealed that the Parish Council are currently in the process of identifying small sites, such as the Site, to allocate in the emerging Neighbourhood Plan.

Pre-Commencement Document

The Pre-Commencement Document 2020 sets out the scope for the New Local Plan. It sets out 11 key strategic policies which will be contained within the New Local Plan and explains that site allocations will be set out in the non-strategic section of the New Local Plan. The following sets out the Church Commissioners' response to the relevant strategic aims of the New Local Plan and explains why the Site should be allocated for residential development.

Housing Requirement

The Council state that their overall housing requirement will be accommodated using the standard method as the starting point. We note that the housing requirement for the Council using the standard method is approximately 1,375 dwellings per year. However this is subject to a 20% buffer because the Council have under delivered in the past. The results of the Council's 2018 Housing Delivery Test (HDT) and February 2020 HDT results were 73% and 78% respectively.

Additionally, the 'Residential Land Survey and Five Year Supply Position Statement April 2019' prepared by the Council highlights that the Council can only demonstrate a 4.4 year housing land supply. Failure to meet housing needs exacerbates unaffordability of housing and reduces the extent to which people can choose to live and work in the local area. It can also lead to housing coming forward in undesirable and unsustainable locations.

The Church Commissioners support the Council's intention to accommodate their housing need as per the standard method and are pleased to note that the Council will use this as a starting point. However, the Church Commissioners urge the Council to apply the 20% buffer as a minimum.

To help with the delivery of housing the Council should consider the allocation of a range of housing sites. This should include larger strategic sites and smaller housing sites as per the National Planning Policy Framework (NPPF) 2019. The NPPF (paragraph 67) requires planning policies to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. This includes identifying specific deliverable sites for years one to five of the plan period. Additionally, the NPPF states under paragraph 68 that:

"small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly"

It is therefore important that sustainable sites, including infill sites such as the Site, are not restricted from providing residential development to contribute towards meeting the Council's housing need.

The Site abuts the settlement boundary providing a natural village infill in a sustainable location and presents an opportunity to bring underutilised land back in to meaningful use to deliver valuable new homes for the area. It is also wholly owned by the Church Commissioners and is available to develop immediately. Allocating a small sized site, such as the Site, for residential development can provide housing quicker than relying on larger and longer-term developments to come forward.

The Council cannot currently demonstrate a five year housing land supply and results of the two most recent HDTs show that there has been and continues to be an under delivery of housing in the area. Allocations for residential development on sustainably located sites, that can be designed to be in-keeping with the surrounding area and tailored to reflect the local housing need, can provide a valuable contribution to the Council's housing land supply. Therefore, the Church Commissioners urge the Council to consider the contribution that small sized, sustainable sites, such as the Site, can make in helping the Council deliver much needed housing in the area and to prepare housing policies accordingly.

Place-making, quality design and provision of community facilities

The Church Commissioners support the strategic objective of 'Place-making, quality design and provision of community facilities' and consider that any future development that comes forward on the Site is able to shape attractive and healthy communities, provide a sufficient amount of green infrastructure and ensure a high quality of design is achieved that enhances and maintains the local character. The Site is not located within a Conservation Area and there are no listed buildings within close proximity so, there are less restrictions for development.

The proposals which were submitted as part of the pre-application advice request were designed to be in accordance with adopted Policy CS12 'Achieving high quality design and place making', which sets out the Council's commitment to achieving high quality buildings and places. The approach to place making and design was accepted by the Council, demonstrating that the Site is able to accommodate high quality residential development.

Environmental and historic conservation and enhancement

The Council's strategic aim of protecting and enhancing landscapes, wildlife and historic assets, strategic green infrastructure and Areas of Outstanding Natural Beauty (AONB) is supported by the Church Commissioners. However, the Church Commissioners encourage the Council to not restrict development coming forward on sites because of existing wildlife designations and where sites can demonstrate sufficient ecological mitigation measures can be implemented to off-set any ecological impacts of the development and improve biodiversity, such as at the Site.

The ecological surveys conducted at the Site to support the pre-application advice request identified that the grassland on the northern extent of the Site was of low ecological importance and that the southern extent was of higher ecological value. In response to these findings, the Church Commissioners amended the proposals to deliver fewer homes and committed to restoring and maintain the grassland at the southern extent of the Site. In response, the Council advised that incorporating exemplary enhancement measures, a detailed management plan and demonstrating a net-gain in biodiversity to off-set the loss of the LWS, could enable development to come forward on the Site. The Commissioners have since undertaken further ecological survey work at the Site which demonstrates that impacts on the LWS can be mitigated and that a suitable buffer can be incorporated and confirm that a biodiversity net gain for the Site is achievable.

Therefore, the Church Commissioners encourage the Council to be flexible in its approach when balancing the protection and enhancement of the environment with the delivery of new housing in its New Local Plan policies.

Sustainability Appraisal Scoping Report

Key Sustainability issues and the North Somerset Local Plan

In the Sustainability Appraisal Scoping Report (SASR), Table 11: Current and future Sustainability Issues in North Somerset and the role of the North Somerset Local Plan, 'meeting housing need' is identified as a key issue and the challenge is identified as providing significant housing growth required over the plan period. As set out in the table, planning policy will be used to require an appropriate level of affordable housing and spatial policies will be used to direct development to the most appropriate location.

The Site is located within a sustainable location which abuts the settlement boundary within the village of Bleadon. 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. Any future residential development of the Site can 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. Therefore, it is considered that the Site can contribute to meeting local community's needs for housing, including affordable housing, as set out in the SASR.

It also noted within Table 11 that 'biodiversity and landscape character area protection' is a key issue and it states that the New Local Plan should ensure that biodiversity and landscape assets are protected and enhanced in new development. The previous development proposals at the Site demonstrate the Church Commissioners commitment to delivering the required ecological mitigation measures to off-set any adverse impacts of development. As noted above, this was also welcomed by the Council in its pre-application response. Therefore, the Church Commissioners consider that development at the Site can contribute to achieving the SASR objective of protecting and enhancing biodiversity, landscape and character.

Conclusion

The Church Commissioners are pleased to have the opportunity to provide comments in relation to the North Somerset Local Plan Pre-Commencement Document Consultation. The Church Commissioners are supportive of the key principles of the documents and would request that the Site is considered for residential development in the emerging Local Plan. The Site would make a valuable contribution to the much needed supply of housing in North Somerset and aid the Council's in being able to demonstrate a 5 year housing land supply, as required by the NPPF.

Should you have any queries on this correspondence, please contact myself or Jonathan Hoban on 020 7007 6831 or jhoban@deloitte.co.uk.

Yours sincerely



Caroline McDade
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