

Response to North Somerset Council Site Allocations Plan Consultation Draft March 2016

CPRE (Campaign to Protect Rural England) North Somerset welcomes the opportunity to respond to the North Somerset Council Site Allocations Plan Consultation Draft March 2016.

CPRE exists to protect the countryside for the public benefit and supports a democratic planning system that provides good quality, energy efficient, well designed accommodation that meets the needs of the local population and respects the landscape.

We note that the purpose of the Site Allocations Plan is to identify the detailed allocations required to deliver the North Somerset Core Strategy. We are disappointed that this document calls for more sites whilst at the same time sites have already been identified in the call for sites in the West of England Joint Spatial Plan. This makes the process lack transparency in terms of extent of land use proposed and so inhibits the ability of the public to have a full picture of development proposals.

We support the policy that protects North Somerset's existing Green Belt, preventing the urban sprawl of Bristol and encroachment into North Somerset countryside which contributes to the character, provides spaces and enhances wellbeing. We also welcome the proposed designations to safeguard or protect particular areas of local green space or strategic gaps.

We support North Somerset Council's approach to an employment led strategy to deliver improved self-containment in Weston-super-Mare. If an employment led strategy is to be effective for North Somerset, it would also be beneficial for this approach to be adopted in the other areas identified for development across North Somerset. Promoting a 'brownfield first' policy and sequential approach would be helpful to ensuring sustainable development.

We acknowledge recognition that the NPPF considers the purpose of the planning system is to perform an economic, social and environmental role. Utilising brownfield sites both for housing and employment prevents unnecessary and damaging development in countryside which impacts on the quality of life and wellbeing. Greater emphasis is needed on the link between jobs, services and transport.

It is noted that the Habitats Regulations Assessment in relation to the North Somerset and Mendip Bats SAC is still to be prepared.

Policy SA1 Settlement Boundaries

We support the principle of development boundaries that help preserve and maintain the character and identity of towns and village but the second paragraph ‘the extension of a residential curtilage.....of adjoining occupiers’ appears to counter that policy and would therefore make it more difficult to enforce. We suggest that the second paragraph is removed.

Policy SA2 Housing Allocations

We support the inclusion of ‘affordable housing’ in all sites.

Policy SA3 Mixed Use Allocations

We support mixed use of sites that meet the needs of the local population and recognise the constraints of individual locations and provides appropriate environmental protection and mitigation.

Policy SA4 Employment Allocations

Sets out clear criteria but then goes on to allow for when that criteria had not been met. Presumably it would not be allocated initially if it did not meet criteria so the last two bullet points are irrelevant and should be removed.

Policy SA5 Safeguarded Employment Sites

We support this policy to safeguard employment sites.

Policy SA6 Retention of economic uses

This policy is not clear as to what it is trying to achieve. It has an employment led policy and the first paragraph of the ‘Background’ reinforces this but the policy refers to the loss of the site rather than the loss of jobs or job potential. It is unclear how removing certain Permitted Development rights would avoid future loss.

Policy SA7 Local Green Spaces

We support the designation of Local Green Spaces and would add ‘landscape’ to the characteristics. It is not clear what qualifies as ‘very special circumstances’ and we recommend that ‘except in very special circumstances’ be removed.

Policy SA8 Undesignated green space

We support this policy.

Policy SA9 - Strategic Gaps

Core Strategy Policy CS19 establishes the need for strategic gaps and the value they bring but the wording in Policy SA9 appears to contradict by identifying what is permitted.

Policy SA10 Community Use Allocations

The policy should ensure that should there be proposals for alternative use of sites there should be no net loss of facilities for the local community.

Policy SA11 Weston Regeneration Area

We support the town centre regeneration although we have concerns as to how this will support the current local population and their very specific needs including health and community services.

Policy SA12 A370 Corridor into Weston-super-Mare

We support this policy that appears to be wide-ranging and impacting on the enhanced quality of the landscape, design, siting and materials and reducing unsightly signage.

Policy SA13 Safeguarded Park and Ride Site, A370 Weston-super-Mare

It is clear this a sensitive site and that mitigation will be necessary. There will also be a need to address the impact on the bat population and we recommend this should be detailed within the policy to allow for the appropriate protection, mitigation and effective implementation.

Housing Numbers

We recognise that North Somerset has been given a housing target of 20,985 for this plan. We supported North Somerset Council in resisting this increase and still believe that these numbers are excessive. The greenfield sites proposed in this allocation plan, along with a number of those already given permission will damage our landscape, increase congestion and put pressure on services.

CPRE is currently making the case nationally for a different approach to housing targets, requiring a 'housing delivery test' to be focused on developers and requiring targets for housebuilding to be based on a realistic assessment of what developers and local authorities are likely to be able to deliver over the plan period.

Please see attached:

- CPRE publication 'Planning Reforms 2016: What's the problem?' detailing these proposals for planning reforms.
- CPRE Glenigan report - Brownfield comes first, why brownfield development works

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