

EXAMINATION INTO THE SOUNDNESS OF THE BANES PMP

**INSPECTOR'S MATTERS AND ISSUES FOR EXAMINATION AT
HEARINGS**

MATTER 19: HOUSING IN SOMER VALLEY

POSITION STATEMENT ON BEHALF OF

THE BIGGIN FAMILY (ID: 6456)





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1. Introduction

- 1.1 This Statement sets out the representors' preliminary response to the Inspector's question in relation to Matter 19.
- 1.2 It should be read in conjunction with both the representors' submissions to the Submission Draft PMP, and their Position Statements relating to other matters identified by the Inspector for Examination.

2. Issue 1: Whether the policies contained in the Placemaking Plan would meet the housing requirement for 2,470 new homes to be built at Midsomer Norton, Westfield, Paulton and Peasedown St John?

Q1

- 2.1 The Somer Valley is a strategic focus for, *inter alia*, new housing in accordance with the spatial strategy (Core Strategy Policy DW1). It is therefore identified as a sustainable location for new development in spatial terms.
- 2.2 Policy SV1 provides for around 2,470 new homes to be built 'at' the four locations identified in the policy. Through reference to 'at', the adopted spatial strategy does not confine new development to locations 'within' the existing limits of the identified settlements. Given the presumption in favour of sustainable development in the NPPF (para. 14), the objective to 'boost significantly' housing delivery (NPPF, para. 47), and the fact that the housing requirement set out in Core Strategy Policy DW1 is not an upper limit, there is no reason why sustainable development opportunities 'at' the relevant settlements which are neither within the Housing Development Boundaries nor allocated in an Adopted Neighbourhood Plan, should not be permitted.
- 2.3 The Core Strategy period is now more than 10 years time-expired. Other than strategic sites at Bath and Keynsham, there have been no new site allocations since the Bath and North East Somerset Local Plan was adopted in October 2007. Moreover, the provisions of the latter were to meet the strategic requirements of the (now abolished) Joint Replacement Structure Plan for the former County of Avon.
- 2.4 Whilst it is understood that Midsomer Norton and Westfield have both been designated Neighbourhood Plan areas, there is little evidence of progress on the respective plans. Consultation draft plans have yet to be published for either area. It is understood that applications for designation as Neighbourhood Areas have not been made by either Radstock Town Council or Paulton Parish Council.

- 2.5 Given the uncertainties of timescale for neighbourhood plans progressing to adoption, or even being progressed at all, the confinement of residential development to sites within the housing development boundaries is unduly restrictive. It could not only prejudice delivery of the housing requirement for the Somer Valley, which is not a maximum, but also preclude otherwise sustainable development opportunities.
- 2.6 Given that a plan-led system is intended to deliver sustainable development in accordance with the NPPF, there is nothing inconsistent with such a system for development to come forward on unallocated sites outside housing development boundaries for proposals that would amount to sustainable development. Given the development management policies that are contained in both the Core Strategy and the PMP, a proposal that is compliant with the development management policies can come forward in accordance with the plan-led principle even if it is on a site that is not specifically allocated in an adopted Plan.
- 2.7 Given the uncertainties in the timescales for Neighbourhood Plan preparation and adoption, it is therefore wholly untenable to seek to restrict development to within housing development boundaries absent an adopted Neighbourhood Plan. This would be inconsistent with meeting objectively-assessed development requirements during the plan period, and is not consistent with the presumption in favour of sustainable development. Sustainable development opportunities that present themselves through the Development Management process should not be deemed to be in conflict with the Development Plan and therefore precluded simply because a site is not allocated in an adopted Neighbourhood Plan, or worse still, a Neighbourhood Plan is not being progressed. That would not be in accordance with the NPPF presumption in favour of sustainable development.

Q2

- 2.8 Sufficient housing allocations are not made to meet the housing requirement. In view of the tight definition of HDBs, and uncertainties surrounding the progression of Neighbourhood Plans (see response to Q1 above) and the deliverability of the mixed use allocations that are made through the PMP (see response to Issue 2 below), it is considered that insufficient housing allocations have been made to achieve the housing requirement.

3. Issue 2: Whether the site allocations are the most appropriate when considered against reasonable alternatives, having regard to the evidence to support the selection of allocated sites?

Q1

- 3.1 The provisions for housing include a number of previously-developed sites that are allocated for mixed use purposes, including retail development. Some have been redundant to their previous purposes for some time, but remain undeveloped. Others have existing occupiers that will require relocation prior to becoming available for redevelopment.
- 3.2 By way of example, three of the key sites (SSV1, SSV2 and SSV4) in Midsomer Norton all include town centre uses which are of uncertain viability and deliverability in current market circumstances, uncertainties that have been compounded in the wake of the Brexit vote. The former Welton Manufacturing site long been identified as a development opportunity, having been allocated for mixed use development (including about 100 dwellings) in the Adopted Bath and North East Somerset Local plan, but has failed to come forward.
- 3.3 The allocation strategy should therefore include some immediately deliverable sites that can contribute to housing land supply within the short term. The representors' site at 46 Radstock Road, which is partly within the housing development boundary as currently defined, is an example of an immediately available and developable opportunity, that is in close proximity, and has good accessibility, to Midsomer Norton town centre and employment locations, that should be included in a portfolio approach.

