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WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

**EXAMINATION OF THE
WEST of ENGLAND JOINT SPATIAL PLAN**

Hearing Statement

Matter 4

On behalf of Nailsea Holdings LLP

May 2019

Walsingham Planning

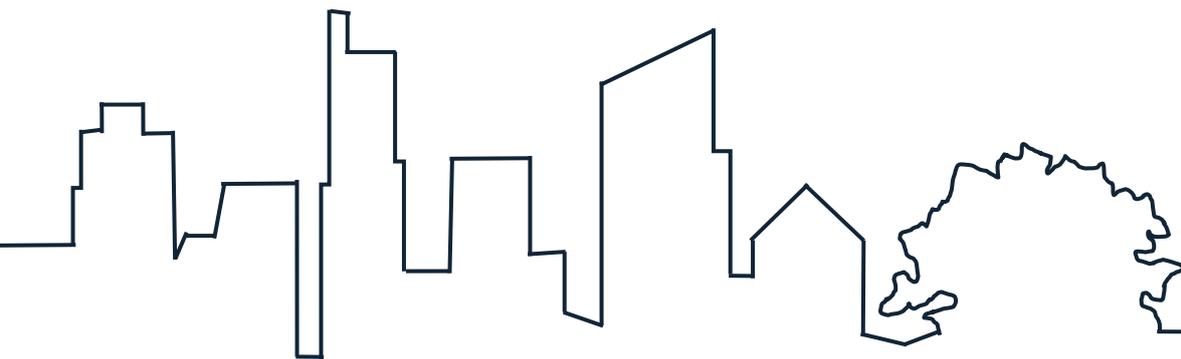
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CONTENTS

- 1 INTRODUCTION
- 2 MATTER 4: THE SPATIAL STRATEGY

APPENDICES

- APPENDIX I – SITE LOCATION PLAN

I INTRODUCTION

- I.1.1 Walsingham Planning has been instructed by Nailsea Holdings LLP (Nailsea Holdings) in to provide evidence at the forthcoming Examination in Public. The representations are made in support of the promotion of the Land north of Nailsea.
- I.1.2 These comments should be read alongside the earlier representations and supporting documents, which were submitted on behalf of Nailsea Holdings who own and are the prospective developers of Land to north of Nailsea as edged red on the attached plan at Appendix I. Earlier representations have been supported by extensive technical work to review the JSP evidence base and demonstrate the deliverability of the site. This includes a concept masterplan, a Transport Review of the Strategic Development Locations and Green Belt Assessment Stage 1 and Stage 2 reviews.
- I.1.3 This Statement responds to specific questions contained within the Inspector's Matters and Questions document.

2. MATTER 4 THE SPATIAL STRATEGY

Question 4.1

- 2.1.1 Significant concerns are raised in relation to the spatial strategy (as set out in Policies 1 and 2) as a lack of robust evidence means that it is neither justified nor effective.
- 2.1.2 As set out in relation to previous Matter we consider the starting point for the Spatial Strategy is fundamentally flawed in as much as the overall housing requirements has been set far too low. It is difficult to see how this can be rectified by the current Spatial Strategy without significant modification.
- 2.1.3 The JSP sets out that the overall housing need for the period of 2016-2036 is 102,200 new homes. The JSP sets a minor uplift to this figure to establish a requirement for some 105,500 new dwellings up to 2036. In addition to this, a contingency of 3,000 dwellings is also identified for consideration should further capacity be required in the future. The mechanism to release any contingency is a review of the JSP after five years: giving a potential housing supply of some 108,000 new homes. Paragraph 19 of the JSP states that “technical work and transport modelling have shown that it is not possible to sustainably accommodate all the identified growth needs entirely outside the Green Belt”. On this basis, Green Belt land within the JSP area is needed to fulfil the requirement. This paragraph adds that “the transport impacts cannot be fully mitigated even with substantial investment. Such a strategy would be dependent on some highly unsustainable locations that are very difficult and expensive to mitigate with only suboptimal solutions”.
- 2.1.4 The Housing Topic Paper established that the net need for affordable housing across the West of England was some 32,200 affordable homes, which includes a need for 5,500 dwellings in South Gloucestershire and 18,800 in Bristol. Paragraph 3.6 of the Topic Paper stated that “meeting the full affordable housing need is a significant challenge”. Whilst, the delivery of affordable housing is apparently a “significant priority” for the JSP, the document only establishes a target requirement for some 24,500 new affordable homes: equating to just 76% of the total affordable housing need.
- 2.1.5 The SDL Templates Document, which informed Policies 7-7.12 of the JSP, highlights the relevant planning opportunities and constraints of each of these SDLs. The ‘Indicative Trajectory’ for the SDL’s indicates that a significant proportion of this housing will likely

not be delivered between the JSP Plan period of 2016-2036 thus leaving an overall shortfall in delivery. Indeed, over half of the homes identified within the housing trajectory shortfall are located in South Gloucestershire. With some 2,500 (57% of the shortfall) projected to be delivered post-2036, a significant number of homes will not be delivered in South Gloucestershire within the plan period.

- 2.1.6 Overall, the JSP is simply not providing sufficient housing, failing in its duty to provide a robust mechanism for its provision. On this basis, the JSP authorities must find additional sites to incorporate into the JSP and Local Plan housing trajectories if it is to be found sound, with Green Belt sites being an inevitable consideration.
- 2.1.7 The individual parts of the proposed housing supply are also of concern. Considerable doubt is raised regarding the ability for 16,200 dwellings to be accommodated within existing urban areas. The evidence base does not provide the level of certainty required to make the plan sound. Whilst the principle of identifying non-strategic sustainable development at locations to be identified in local plans is acceptable significantly more than the number of new dwellings provided for in the JSP will need to be included in this part of the spatial strategy.
- 2.1.8 The 12 strategic development locations to be allocated through local plans (around 17,600 new dwellings) are not fully justified, lack robust evidence to justify their inclusion and rely on significant infrastructure.
- 2.1.9 The distribution of new dwellings between the four authority areas as set out in policy 1 does not represent the most suitable strategy as it has not properly tested the ability of the green belt to accommodate growth in the most sustainable locations.
- 2.1.10 Land at north of Nailsea is well located and more sustainable than other sites relied upon for delivery by the JSP. Given the need to consider sustainable locations on the edge of Nailsea, our clients site provides a suitable and deliverable additional site.

Question 4.2

- 2.1.11 The evidence demonstrating how the proposed requirement of 102,200 dwellings will be delivered in the JSP plan period is far from convincing.

- 2.1.12 Policy 2 of the JSP establishes the spatial strategy and the justification underlying the choice of locations for identifying how the JSP housing and employment requirements will be delivered across the West of England, including within the Green Belt. The policy and its supporting text also provide more detail on the 3,000-home contingency during a review of the plan after five years. In relation to the Green Belt, paragraph 11 notes that “a substantial part of the subregion (around 48%) lies within the Bristol-Bath Green Belt”. Paragraph 12 of the JSP states that “having examined the other reasonable options for meeting the identified development requirements, the JSP concludes that there are exceptional circumstances to justify the release of certain locations from the Green Belt”. In doing so, it seeks to minimize the impact on the Green Belt and its general extent remains unchanged, with 0.65% proposed to be removed. If our clients land north of Nailsea site was removed from the Green Belt, the increase in the percentage lost would be de minimis.
- 2.1.13 Policy 2 of the JSP sets out that the Plan will be reviewed every five years following adoption. Adding that the release of the contingency sites will be considered as part of the five-year review of the Plan “if planned housing provision is not being delivered at the levels being planned for, and there would be no reasonable prospect of the planned delivery being met”. This is in order “to ensure that the strategy is being delivered and to take into account new evidence” (Paragraph 15).
- 2.1.14 Taking into account the above evidence, if just one of the SDLs above were to fall behind on its anticipated delivery trajectory or in the event that one of the SDLs stalls this would put the anticipated delivery of houses within the Plan period in serious jeopardy.
- 2.1.15 In terms of the deliverability of the proposed contingency sites, it is considered that those sites which have been included contain a number of unresolved issues, with a very limited explanation within the evidence base as to how and where the houses will be delivered.
- 2.1.16 For instance, the contingency sites include land south of Chipping Sodbury, which could make provision for 1,500 dwellings with up to 775 delivered in the plan period; thus leaving a shortfall of 725 homes outside of the plan period: totalling a potential shortfall of 5,075 homes if the contingency were to be applied.
- 2.1.17 In addition, it is questioned where the proposed provision of nearly 1,500 homes to the east of Clevedon would be located. Whilst this is an area which benefits from flood

defences, Figure 3 below nevertheless highlights that most of the town and the area to the east of Clevedon is located in Flood Zone 3 (1 in 100 year or greater probability of flooding), so major flooding implications could arise here.

- 2.1.18 There is significant uncertainty about the proposed 'reserve' sites within the JSP and whether these would be suitable locations in which to deliver up to 3,000 new homes. In this instance, the contingency sites cannot be considered as justified. This point further enhances the need to identify suitable alternative sites.
- 2.1.19 Overall, we recommend that all or part of the land north of Nailsea as shown on the attached plan is removed from the Green Belt and allocated for mixed-use development.
- 2.1.20 With the exception of the current Green Belt designation there are no designations or technical constraints that would preclude development. Based on the concept masterplan it is anticipated that around 600 dwellings could be delivered.