

**Additional Written Statement on behalf of Hon Andrew Jolliffe**

We welcome the opportunity given by the Inspector following the hearing on 25th January 2012 to provide additional written statements in respect of the deliverability/developability of the sites in the SHLAA (CD4/H14) relied on by the council. Our key concern is that the SHLAA does not represent a full and robust account of the developability and deliverability of sites in the Somer Valley. This is for the following two main reasons:

- **‘Sustainability’ and justification of extant boundaries.** The SHLAA excludes a large number of sites because they lie outside of extant Housing Development Boundaries (HDBs), on the apparent basis that these are reliable guides of what is and is not sustainable. This is the case for site RAD.24 (of which our client is the landowner) and, we understand, several others. This raises the question of how robust HDBs are as a guideline on sustainability. We understand that they were defined at around the late 1990s, and they remain largely unchanged since the Local Plan Deposit Draft 2002. To our knowledge there is no available evidence to support the location of these boundaries; and none has been presented to this Examination.
- **Detail and scope of assessment.** Whereas the SHLAA purports to identify sufficient sites, assessments published to date by no means demonstrate that all the brownfield/regeneration sites are deliverable. Conversely, although the countryside surrounding the Somer Valley settlements has constraints, it has not been shown that there are no suitable candidate sites beyond HDBs. In our view the current SHLAA position is not robustly founded, for instance there having been no detailed landscape setting assessments of Norton-Radstock to identify areas of higher or lower sensitivity to new housing development around the urban periphery.

In summary we are concerned that the Core Strategy and SHLAA fall into a circular logic in respect of SHLAA site suitability. On the one hand, Core Strategy policy SV1 (4) draws on the SHLAA in considering there to be no suitable sites outside of the HDB. However at the same time Core Strategy policy SV1(4) is itself cited by the SHLAA as a reason to consider sites unsuitable in the first place. Thus, nowhere is it shown that all sites outside of the boundary are inherently unsuitable. For this reason we welcome the ‘Placemaking Plan’ and the opportunity it will provide to assess fully all potential sites, and in the meantime propose the following adjustment to the wording of Core Strategy policy SV1(4)(b):

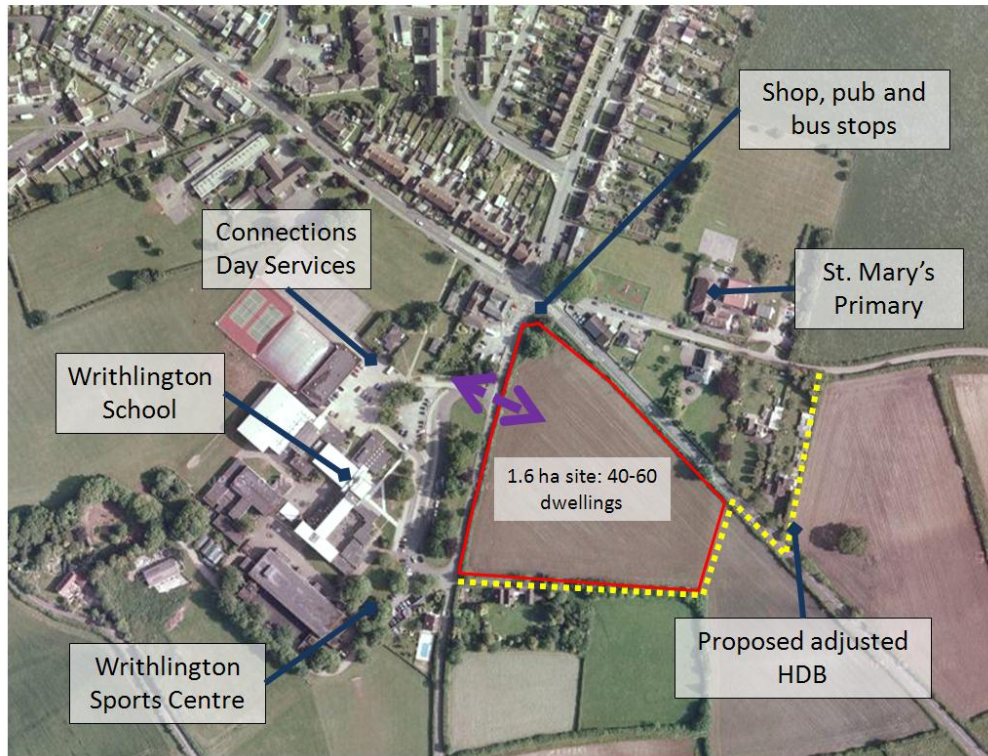
*Ensure that any new housing above the existing commitments of 2,200 dwellings*  
**contributes to sustainable development** ~~is within the Housing Development Boundary [...]~~

**Site information**

In the context of these concerns, we would draw the Inspector’s attention to our client’s site (SHLAA ref RAD.24) at Writhlington as an example of a site whose merits demand due consideration through a site allocations document such as the ‘Placemaking Plan’. This site would, in our view, represent an achievable and inherently sustainable medium-scale development opportunity.

The site lies adjacent to a range of facilities including a primary school, secondary school, and sports centre, public transport links, and shop. Further it would not significantly extend the overall envelope of Norton Radstock, and would avoid impacts on the Conservation Area or any ecological designations (all of which are some distance away). Development on this site could more readily be delivered than brownfield alternatives (there being no dependency on it becoming vacant or being remediated); and community facilities and other infrastructure could be more effectively planned from the outset than on many of the smaller-scale infill alternatives included within the SHLAA. A site identification plan and photographs are provided overleaf to illustrate these key points.

**FIGURE 1: SITE IDENTIFICATION PLAN**



**FIGURE 2: PHOTOGRAPH OF NORTH-EASTERN SITE BOUNDARY (A362 FROME ROAD)**



**PHOTOGRAPH 2: WESTERN SITE BOUNDARY (KNOBSBURY LANE)**

