

# **BANES PLACEMAKING PLAN EXAMINATION**

## **RESPONSE TO INSPECTORS MATTERS AND ISSUES (ID/3 – REV 1)**

### **MATTER 19 HOUSING IN SOMER VALLEY**

**ON BEHALF OF RADSTOCK LLP (PARTICIPANT ID: 6414)**

## **Pegasus Group**

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

**T** 01454 625945 | **F** 01454 618074 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

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**1. MATTER 19 – Housing in Somer Valley**

**Issue: Whether policies contained in the Placemaking Plan would meet the housing requirements for the Somer Valley of 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasdoem St John**

*Q1. Is CS Policy SV1, as amended to restrict development within the housing development boundary (unless identified in a neighbourhood plan), positively prepared and justified?*

*Q2. Are sufficient housing allocations made to achieve the housing requirement?*

- 1.1 In our Matter 2 statement we set out the case for, why in-principle, the proposed Housing Development Boundaries cannot be regarded as being positively prepared, justified and consistent with national policy. Additional allocations are needed, or greater flexibility is needed in respect development outside HDBs, at sustainable locations is needed, with guidance as to the broad locations where development will be permitted
- 1.2 Whilst the shortfall in relation housing land supply is largely generated at Bath and not the Somer Valley, this policy area needs to play a role in correcting the shortfall, if the Placemaking plan is to enable the delivery of the overall housing requirement for the District.
- 1.3 The Somer Valley contains sustainable settlements, offering suitable land, outside the Green Belt. Further, the designation of the Somer Valley element of the Bristol, Bath & Somer Valley Enterprise Zone (EZ) is a significant change in circumstances since the adoption of the Core Strategy that will act as a catalyst for jobs growth as set out in the Council new wording (paragraph) of the Somer Valley section.
- 1.4 It is therefore reasonable to reassess the level of housing development for the Somer Valley policy area, in-principle, and in light of the overall land supply deficit. Any solutions in the north of the District will require Green Belt release. This is not the case in the Somer Valley. Moreover, the Somer Valley is within the Bath Housing Market area where as the western part of the District is within the Bristol HMA and experiences the gravitational pull of Bristol. There is therefore good reason for the Somer Valley policy area to play a role in correcting a housing shortfall as it is more strongly functionally linked to Bath – where the shortfall arises.
- 1.5 The Midsomer Norton Neighbourhood Plan is not at an advanced stage and it is not currently seeking to make additional housing allocations. It only covers part of the

environs of Midsomer Norton (as other parishes e.g. Paulton run upto the urban edge) and falls a long way short of being able to plan for the Somer Valley as a whole. This is an opportune time to modify the Development to effect the delivery of the districts housing requirement. The Placemaking Plan is the correct vehicle for achieving this.

1.6 NPPF:14 states that

*At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.*

*For plan-making this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
  - *specific policies in this Framework indicate development should be restricted.*

1.7 The NPPF therefore requires the LPA to positively find a solution to enable is development plan to deliver the overall housing requirement, unless one of two tests are met. We do not consider those test are met with regard to the Somer Valley policy area

1.8 Any argument by the LPA that the acknowledged or addtional shortfall can be 'kicked down the road' and dealt with as part of a full Local Plan Review should be denied. This is because the Council is in a Local Plan Review situation now – albeit one that is not looking at the time horizon of the plan or overall requirements. Although termed as Part 2 of the Local Plan the PMP is a review of the deliverability of the Development Plan and attempts to 'complete' the Development Plan. There is no Part 3 planned and thus it falls on Part 2 to complete the job. The Development Plan should not be left incomplete after two stages of plan preparation. The LPA is in the precise policy making space that has the purpose of focusing on delivering the overall requirement. The Development Plan as a whole is being reviewed to ensure that its headline requirements are being positively planned for.

- 1.9 Currently the Somer Valley is tasked with delivering 2,470 homes and 19% of the districts requirement of 13,000 dwellings. It is considered that this figure can be flexed upwards without causing a change to the spatial strategy itself.