

Our Ref: GT/MH/83127

15 August 2016



Mr C Banks
Programme Officer
C/O Banks Solutions
64 Lavinia Way
East Preston
West Sussex
BN16 1EF

Dear Mr Banks

**FURTHER REPRESENTATIONS TO DRAFT PLACEMAKING PLAN
LAND TO THE REAR OF PAYSONS CROFT, CHURCH LANE, BISHOP SUTTON, BRISTOL, BS39 5UP**

Alder King Planning Consultants have been instructed to submit a further statement in relation to the BANES Pre-Submission Draft Placemaking Plan December 2015 in light of questions raised by the Inspector in ID-3.

Relationship between the adopted Core Strategy and Placemaking Plan

The BANES Core Strategy was found sound partly on the basis that a review of Housing Development Boundaries via the Placemaking Plan would be able to identify suitable sites in order to deliver sufficient housing (and to avoid having to release Green Belt land) to ensure a 5 year supply of deliverable housing land.

Policy RA1 of the adopted Core Strategy confirms that in villages outside the Green Belt, residential development is acceptable in principle, that development sites would be identified in RA1 villages and the housing development boundaries (HDB) would be reviewed.

Paragraph 66 of Rural Areas of the Placemaking Plan states that policy RA1 should be considered alongside Green Belt policy and that no exceptional circumstances exist to warrant changing the boundaries of the villages excluded from the Green Belt. Following which the Council propose to alter policy RA1 to remove all reference to identification of development sites and review of housing development boundaries in RA1 villages.

The adopted Core Strategy policy RA1 does not require an exceptional circumstances test to be passed to trigger the need for a HDB, instead the Core Strategy specifically states that one will be undertaken for RA1 villages. The lack of a comprehensive HDB review in all RA1 villages together with the proposed changes to adopted policy RA1 are unjustified and do not result in a positively prepared plan. It is considered important to undertake a full Housing Development Boundary review to remain consistent with the Core Strategy.

The Placemaking Plan is presented together with the Core Strategy policies. It is considered that this confuses the status and application of the two plans. If it is considered that policy RA1 should alter and no comprehensive review of the HDB is undertaken then the policies of the Core Strategy are out of date and a full Local plan review should be undertaken, not just parts selected by the Council.

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Sufficient Provision of Housing in Rural Areas

Paragraph 157 of the Framework requires Local Plans to plan positively for development required in the area, to meet the objectives, principles and policies of the Framework which, amongst other things, includes the imperative to boost significantly the supply of housing. This requires sites to be allocated to promote development and flexible use of land, bringing forward new land where necessary.

Core Strategy Policy RA1 requires villages to make a positive contribution towards meeting the wider, objectively assessed housing need for the B&NES District which is for around 13,000 dwellings over the period to 2029. In so doing, the requirement is that they provide sites for around 50 dwellings in each RA1 village.

The Council's Housing and Economic Land Availability Assessment (HELAA) April 2016 and associated Housing Supply Trajectory shows there is at best a 5 month shortfall in their 5 year housing supply and confirms that there has been an under-provision of housing in the Rural Areas over the years 2011/12 to 2014/15, reflecting the wider picture of under-delivery across the District as a whole. Despite this, a number of Policy RA1 villages have no allocations with there being insufficient evidence to demonstrate that the housing requirement for these settlements can be met. Whilst the inclusion of additional windfall sites in policy RA1 is welcomed, it is likely that this will be insufficient to deliver developable and deliverable small scale sites. Not undertaking the HDB review to extend RA1 villages such as Bishop Sutton in appropriate locations effectively acts as an impediment to the growth and sustainability of these villages resulting in a plan that is not positively prepared.

The Council have only reviewed major sites (10+ units) across the district including rural areas however major sites in rural areas such as RA1 villages, are not always appropriate. There are sites in the RA1 villages such as Bishop Sutton which can accommodate small scale development of sites less than 10 units that are adjacent to but outside the HDB which have not been considered by virtue of their density capacity rather than their deliverability and have been excluded because no HDB review has been undertaken. For example Land at Church Lane Bishop Sutton (attached) would accommodate small scale development of up to 10 units partly within the settlement boundary and in the line of built form, surrounded by built development on three sides and in the dip of undulating topography. They would to all intents and purposes be self-build units and it is precisely this type of small scale development that central government is encouraging through the Written Ministerial Statement originally published in November 2104 concerning small scale development.

Such sites should also be considered appropriate for future development because cumulatively they will add to the housing stock whilst being of such a size so as to retain village character contributing to the organic growth and sustainability of the village instead of a major site bolted on one edge which may provide an awkward relationship with the existing settlement and undermine community cohesion.

In the absence of undertaking a HDB, to ensure sufficient provision of housing is achieved in the rural areas, an element of flexibility needs to be included in the proposed Placemaking Plan policy to ensure that in the event of increased identified housing needs, there are sufficient sites to accommodate required growth. As such as well as undertaking the HDB review in RA1 villages, in addition to this policy RA1 should be revised to enable development to take place outside of but adjacent to Housing Development Boundaries.

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Stowey Sutton – Bishop Sutton

Whilst the Stowey Sutton area has had some housing permitted through appeal, the Placemaking plan makes no allocation of development because it is stated that these appeal sites have provided sufficient housing. However this fails to recognise that housing needs are likely to increase and the advent of the Joint Spatial Plan is an important material consideration. Whilst it is acknowledged that this Placemaking Plan cannot and should not be reviewing the overall housing target figure, it is appropriate to have regard to material considerations such as the Joint Spatial Plan findings that 85,000 dwellings are necessary for the West of England to accommodate. It is highly likely that increased housing needs will be identified in the near future and the Placemaking Plan needs to be able to accommodate future growth requirements.

The Placemaking Plan covers Bishop Sutton by title but no mention is made of the village and the Placemaking Plan is silent on any future development for this area despite the location being an RA1 village with a post office, primary school, a community hall and convenience store. Future development possibilities for Bishop Sutton and a review of the Bishop Sutton HDB should be clearly undertaken and referenced in the Placemaking Plan.

It is necessary for a comprehensive detailed review of all Housing Development Boundaries to be undertaken. This would enable the identification of sites not just major ones, but small scale ones as well; the development of which would cumulatively contribute to the housing stock. Such sites would facilitate flexibility of future development identified through future housing needs surveys to ensure sufficient provision of development is made in RA1 villages whilst ensuring the villages do not expand too quickly but evolve organically and remain sustainable with good community cohesion.

Yours sincerely

A handwritten signature in black ink, appearing to read "Genevieve Collins".

GENEVIEVE COLLINS
Senior Planner

e-mail gcollins@alderking.com
direct dial 0117 317 1178