

Preferred Options: Pineapple Farm, Congresbury

M7 Planning Ltd

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1.1 **Introduction**

1.2 The enclosed representations have been prepared on behalf of M7 Planning Ltd who has land interests at known as Pineapple Farm off Mulberry Road, Congresbury. M7 Planning are an established land promotion company who has vast experience in delivering sustainable strategic residential developments in the south west of England.

1.3 Land off Mulberry Road as it stands is a proposed residential allocation for 90 dwellings in the Preferred Options consultation. An Outline Planning Application has been submitted to North Somerset Council for the development of up to 90 homes with all matters reserved except for access at the site. The planning application reference is 22/P/0459/OUT and the statutory consultation period ends on 07 May 2022.

1.4 If approved, the proposed development would comprise:

- a variety of house types and sizes ranging from 1, 2, 3-and 4-bedroom homes which will include homes that cater for first time buyers and the elderly.
- The proposal aims to deliver emerging policy compliant affordable housing provision. Affordable housing will be integrated into the scheme layout using the same design principles as for the open market housing.
- The affordable homes are intended to be pepper potted across the site, with no more than 6 units being sited together in accordance with the Councils' SPD on affordable housing.
- The affordable housing will include a mix of social rented, affordable rented and intermediate tenures.
- Public open space and a children's play area.

1.5 M7 Planning Ltd welcome the Sites proposed allocation in the preferred options consultation.

SP1 – Sustainable Development

1.6 The presumption in favour of sustainable development is at the heart of the National Planning Policy Framework (NPPF) and relates to both plan making and decision taking. North Somerset Council has provided a list of requirements that development proposals should, where appropriate, demonstrate if they are to be considered sustainable – which we believe to be well thought out and acceptable.

1.7 We consider the proposed allocation of Land off Mulberry Road to be in accordance with the policy requirements of draft Policy SP1, where relevant, as set out below:

1.8 **Address Climate Emergency:** The proposed allocation seeks to meet much needed homes in an unconstrained location within an active travel radius of services, facilities and public transport connections.

1.9 **Support delivery of zero-carbon development/Support decentralised renewable energy generation:** M7 Planning is committed to delivering a scheme that reduces carbon emissions. This includes, but is not limited to:

- 1 Improved methods of construction to achieve carbon reduction.
- 2 Incorporate facilities to enable the charging of plug in or ultra-low emission vehicles;
- 3 Decentralised renewable energy generation in the form of PV Panels, solar thermal panels, ground & air source heat pumps and biomass boilers;
- 4 Bio-diversity net gain to meet emerging policy targets as a minimum.

1.10 **Prioritise active travel and effective public transport/Ensure active travel and public transport access to a wide range of services, facilities, jobs and recreational opportunities and support the creation of 20-minute communities:**

- 1.11 The site is located within walking distance (300m) to a wide range of existing services and facilities, including a convenience store, a bakery, a post office, a takeaway and a butcher (The Precinct, Brinsea Rd). St Andrews Church of England Primary School is located approximately 1km north west of the site. There are also additional services and facilities including a doctor's surgery, pharmacy, pubs/restaurants and hairdressers within 1km of the site.
- 1.12 The site is well located to a variety of amenities using public transport. The Brinsea Road (North and South bound) bus stop is located 400 metres from the site and is serviced by the A2. The X1 Weston Super Mare to Bristol service stops at Station Road (approximately 1.4km walking distance), with services every 15 minutes during the day. Additionally, Yatton is located within cycling distance which offers a wider range of services and facilities including Yatton railway station (approximately 3km).
- 1.13 The proposed development would create safe and suitable connections with Congresbury, particularly through the PROW connecting to Park Road where the vast majority of pedestrian and cycle movements are envisaged to take place. The two existing PROW which cross the site will be improved and retained providing valuable pedestrian connections to the local street network and surrounding amenities. The PROW also provides walking connections to the wider countryside adjoining the site to the east.
- 1.14 The site presents strong sustainability credentials and is therefore considered to be sustainably located, meaning that the proposed scheme would contribute towards achieving active travel and 20-minute communities.
- 1.15 **Support economic development in locations that are, or will be made, accessible by sustainable modes:** The direct and indirect economic benefits of the proposed development of the Site have been quantified and form part of the submitted planning application. These comprise:
- 1 92 construction jobs for local people;
 - 2 £190,000 in additional Council Tax payments to the Council;
 - 3 £495,000 in expenditure in the local area as new homeowners seek to personalise their new property; and
 - 4 £2m in resident expenditure on weekly goods at local shops and businesses by the new residents;

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- 1.16 In addition to these local benefits, Clevedon and Bristol Airport are only 12 and 21 minutes away when using public transport; and the main economic hub for the wider region, Bristol, is 60 minutes via bus from the proposed site.
- 1.17 **Deliver the mix and type of housing to meet local needs:** The proposed development would accommodate a range of house types such as 1, 2, 3, 4- and 5-bedroom homes catering for first time buyers and families.
- 1.18 **Create healthy, safe and cohesive communities and reduce inequalities:** The proposal aims to deliver a truly sustainable new community with a wide range of services and facilities.
- 1.19 **Deliver essential infrastructure in step with development:** Detailed drainage and transportation assessments formed part of the submitted outline planning application. These identify the essential physical infrastructure, including Sustainable Drainage Systems (SuDS) features and highways works that would be delivered up front as part of the proposed development.
- 1.20 **Prioritise good design and placemaking:** The outline application includes a Design and Access statement that demonstrates the proposed development has been designed with best practice in mind to ensure that future residents thrive.
- 1.21 **Retain and enhance locally important natural and historic assets, landscapes and townscapes:** The site is not the subject of any landscape quality, ecological or heritage designations. There is one Listed Buildings within close proximity to the proposed scheme – Park Farmhouse, a Grade II Listed Building. Heritage considerations, namely the desire to protect the setting of the Farmhouse will form a key driver in development considerations. The Landscape and Visual Impact Assessment (LVIA) prepared by Steele Landscape Design for the proposed development concludes that the proposal would integrate reasonably well with the local landscape and is not an immediate and obvious feature within views from the wider surrounds.
- 1.22 **Promote the optimal use of land including prioritising use of previously developed land:** The site is unconstrained and presents an opportunity to meet much needed housing need in a sustainable location. The proposed development would seek to make efficient use of the site whilst respecting the character and pattern of surrounding development.
- 1.23 **Protect and enhance green infrastructure, biodiversity and geodiversity, particularly protected habitats and species:**
- 1.24 An Ecological Impact Assessment accompanies the outline planning application. To mitigate the minor, residual loss of habitat for foraging bats, off-site habitat enhancement and creation measures will be proposed.
- 1.25 Other features are also proposed, which include:
- 1 Retaining green corridors to create play facilities and public open space;
 - 2 Retaining key ecological features such as hedgerows and hedgerow trees to create a network of habitat corridors, along with pedestrian networks;

- 3 Retaining suitable habitats for amphibians and incorporating habitat features into the scheme such as bird boxes within some of the buildings proposed;
- 4 Clustered tree planting, hedgerow strengthening and delivering species rich grasslands;
- 5 Creating sustainable drainage attenuation features, which will also provide biodiversity enhancements via the creation of wetland habitats;
- 6 Waste reduction and recycling emphasis; and
- 7 Bio-diversity net gain to meet emerging policy targets as a minimum.

1.26 **Avoid adverse environmental impacts such as ground, water and air pollution:**

1.27 The proposed development is the subject of an outline planning application and potential adverse environmental effects during both the construction and operational phase have been assessed through a series of technical assessments, all forming part of the formal application submission.

1.28 In respect of the construction phase, a Construction Environmental Management Plan (CEMP) would be produced to ensure all ground, water and air pollution concerns are addressed.

1.29 The sustainability credentials of Pineapple Farm have also been acknowledged in the Sustainability Appraisal (SA) prepared by the Council which forms a critical component of the evidence base supporting the emerging Plan. The SA assesses and compares alternative sites to ensure that the proposed allocations are aligned with the agreed sustainability objectives. The SA states that the *“site has no significant constraints and has low landscape sensitivity according to the North Somerset Landscape Sensitivity Assessment. Development of the site can be well integrated into the built form of the settlement and there are good pedestrian links to the local centre making it one of the more sustainable sites within Congresbury.”* As such, it is clear that not only do we consider the Site to present a sustainable development opportunity, but so does the Council, informed by their own evidence base work. Our client supports the proposed allocation of the Site and look forwards to it being carried forward to the Reg.19 stage.

SP2 – Climate Change

1.30 Development proposals must demonstrate how they will address climate change mitigation and adaptation, encourage the decarbonisation of energy and transport, and support the delivery of a carbon neutral North Somerset by 2030. Whilst we agree with the thrust of the policy objective, it is vitally important that the scope of the desired deliverables do not undermine the deliverability of viable development. Specifically, it is important for the Council to categorise priorities such that essential items that are fundamental to the delivery of new development are distinguished from items that are important i.e. access infrastructure compared to net zero standard in new buildings.

1.31 We note that the wording of draft Policy SP2 presents the identified requirements as all having to be satisfied/addressed as a prerequisite for development to be supported. This however may not be feasible from a locational, technical or viability perspective. It is important that flexibility is embedded into the draft Policy.

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- 1.32 In respect of the proposed allocation of Land off Mulberry Road, Congresbury, M7 Planning Ltd is committed to delivering a scheme that seeks to positively address the Climate Emergency. The potential measures are discussed in detail under our response to Policy SP1 above.
- 1.33 We consider that the proposed allocation and subsequent development of the Site would align with the emerging Local Plan's climate change aspirations as per Strategic Policy 2.

SP3 – Spatial Strategy

Is the mix and location of sites appropriate to deliver the plan's objectives? In particular, is the balance between town and village development appropriate?

- 1.34 The aim of the spatial strategy is to focus development within or close to towns and urban areas, maximising the use of previously developed land, and optimise opportunities to encourage walking and cycling and access to effective public transport.
- 1.35 The shortfall in housing land supply proposed by the Preferred Options consultation draft against the Local Housing Need is approximately 2,800 homes. Whilst we do not consider that there are exceptional circumstances that justifies a departure from the Local Housing Need assessment, we acknowledge that the current shortfall presents an improvement on the 6,000-shortfall identified in the previous consultation. This improvement can be attributed to the acceptance that sustainable sites within the Green Belt should be brought forward - a principle that we strongly support.
- 1.36 Our client supports the proposed Spatial Strategy and agrees that it is important to seek to prioritise new development opportunities in or close to urban areas where either existing or proposed measures will allow easy access to services and facilities, preferably by means of active travel.
- 1.37 It is, however, vitally important that the proposed Spatial Strategy is viewed with pragmatism owing to the highly constrained nature of North Somerset and the need to further identify as a minimum a further 2,800 homes. Indeed, the approved Strategy acknowledges the scale of the housing challenge and the constraints facing North Somerset, meaning that it is extremely unlikely that the government's growth target can be delivered even when taking account of sustainable sites within the Green Belt. Further to this, the upward pressure on Housing need owing to unmet need from within the wider region, namely Bristol, means that the theoretical shortfall is greater than the existing 2,800 deficit against the Local Housing Need. We are therefore of the view that the new Local Plan will need to embrace a step change in ambition in respect of housing delivery, aligned with the Governments desire to see 300,000 new homes built annually.
- 1.38 The sustainability credentials of Pineapple Farm, Congresbury are abundantly clear as evidenced through the proposed allocation. It is essential that whilst further growth opportunities are explored, existing proposed allocations are maintained and carried forward to the Regulation 19 consultation stage.

SP4 – Placemaking – N/A

SP5 – Towns – N/A

SP6 – Villages and Rural Areas

The emerging Plan appears to provide only a 2-tier settlement hierarchy, namely Towns comprising Weston, Clevedon, Nailsea and Portishead, with the remainder of the all settlements within North Somerset falling within the all-encompassing ‘Villages and Rural Areas’ policy/category.

Whilst we agree that the four Towns are the most sustainable locations that should be considered first from a sequential perspective to accommodate future growth, the remaining settlements, namely villages do not all perform a uniform function and should therefore not be treated the same under draft Policy SP6.

There are a number of villages, including Easton in Gordano/Pill, Backwell, Yatton, Banwell, Congresbury and Wrington, that perform a higher function in respect of serving a wider catchment and benefit from good public transport connections. We are of the view that these villages need to form a second tier within the settlement hierarchy above rural villages (first tier comprising the four towns under Policy SP 5).

We note that the emerging Plan recognises the sustainability credentials of these higher order villages as evidenced through the direction of a proportionate quantum of growth to these locations.

We believe that it would be appropriate for area specific policies aimed at both the four towns and higher order villages to present a criteria based policy that permits appropriate and proportionate growth within and adjoining settlement boundaries – akin to adopted Policy CS31 and CS32.

We believe that the above approach would support the necessary step change required to deliver and address North Somersets housing needs.

SP7 – Green Belt

Do you support the conclusion that it is necessary to consider locations for development within the Green Belt?

- 1.39 North Somerset is highly constrained namely in respect of flood risk, statutory nature conservation designations (Ramsar and SSSI) as well as the Mendip Hills AONB. We do not believe that it is possible nor desirable to meet the housing requirement for North Somerset in a sustainable way without exploring development opportunities within the existing Green Belt.
- 1.40 We entirely agree with the Council’s proposed approach to explore limited growth opportunities in Green Belt and consider that the case for this has been clearly evidenced and justified in the emerging Plan and accompanying evidence base.
- 1.41 We believe that the emerging Local Plan has to be ambitious in order to deliver a step change in housing delivery and a key component of this is to explore development opportunities in Green Belt that present strong sustainability credentials. We believe that the Council has fully evidenced and justified the release of appropriate sites from Green Belt to date, which includes Land East of Backwell. The shortfall of identified developable sites against the Local Housing Need (2,800 dwellings) coupled with further upwards

pressure means that, in our opinion, additional opportunities both within Green Belt and beyond that are aligned with the approved Spatial Strategy need to be explored.

SP8 – Housing

The government’s housing requirement for North Somerset is 20,085 dwellings over the plan period. This Preferred Options identifies capacity for about 90% of this total. How should we make up the shortfall?

- 1.42 We welcome recognition that the emerging Local Plan will need to meet the Local Housing Needs Assessment in full. At the time of the Preferred Options being drafted the requisite Standard Methodology figure was 1,339 dwellings per annum or 20,085 over the plan period (February 2022 update). The April 2022 Standard Methodology update is 1,392 dwellings per annum, representing a minimum Local Housing Need figure of 20,880 over the 15-year plan period. This is an increase of 53 dwellings per annum and a requirement to find a further 795 homes across the plan period. As such, the identified developable housing shortfall is almost 3,000 homes and not 2,000 as suggested in the draft Plan.
- 1.43 As advised previously, the Local Housing Need has to be treated as a minimum, with further clear upward pressure and a historic absence of unmet need accumulating across the region. We would expect North Somerset to be accommodating a proportionate quantum of this historic unmet need through the ‘Duty-to-Cooperate’.
- 1.44 We support the broad distribution of growth set out under draft Policy SP8 for which the supporting text advises is in accordance with the Spatial Strategy – a point that we consider is factually incorrect.
- 1.45 As set out in our representations in respect of SP6, we do not consider that the proposed Spatial Strategy sufficiently distinguishes the sustainability credentials of higher order villages (formerly Service Villages) and we consider that the Spatial Strategy should be amended to comprise a three-tier settlement hierarchy with Towns at the top, followed by higher order Villages, with rural villages at the bottom. This view is supported by the proposed broad distribution of growth which identifies Congresbury as an appropriate location to accommodate approx. 250 dwellings.
- 1.46 The emerging Local Plan has to be ambitious in order to deliver a step change in housing delivery and that the planned growth needs to respond appropriately to the ‘Climate Emergency’ declared by North Somerset Council in 2019. We do however recognise that this strategy is reliant on the timely delivery of the necessary infrastructure and therefore consider that it is vital that a range of smaller sites proportionate in scale to the settlement at which they are located are also identified in order to deliver housing completions early doors. Such sites by virtue of their limited scale would be capable of utilising existing infrastructure. We consider that Pineapple Farm is one such site.
- 1.47 Whilst we welcome the proposed allocation of Pineapple Farm, further opportunities need to be explored further. This should comprise a variety of sites, including parcels adjoining Towns, higher order villages and the most sustainable opportunities within the Green Belt. It is important that the Council acknowledges that heavy reliance on large scale allocations

(such as previously in WSM) results in a unpredictable housing supply. A mixture of large and small allocations, alongside a flexible policy akin to CS31 and CS32 are welcomed.

Does the Plan deliver the type of housing that our residents need? Is the affordable housing target of 40% affordable housing on large sites appropriate to address needs and deliverable?

- 1.48 There is an acute shortage of housing across North Somerset and emerging Plan needs to embrace a step change in delivery to address this. The need is present across a wide spectrum of house type and tenure. It is therefore vitally important that the specific deliverable and developable sites identified across the County are wide ranging in scale, location and type (both brownfield and greenfield).
- 1.49 In respect of affordability, there is a crisis and it is right that the emerging Plan seeks to tackle this. The choices made through the emerging Plan in respect of scale and location of development will however have a bearing on the ability of future development to support an enhanced contribution of 40% towards affordable housing. Strategic scale schemes are likely to involve major new infrastructure and opening up costs which may diminish the ability of such schemes to maintain viability at a 40% affordable contribution.
- 1.50 Whilst it is perfectly acceptable for the plan to be ambitious and to set a ‘target’ of 40%, this needs to be ascertained on a site-by-site basis with scheme viability a key consideration. We note however that the proposals for Land off Mulberry Drive do aim to be compliant with the emerging affordable housing policy requirements of 40%.

SP10 - Transport

- 1.51 Proposed Policy SP10 seeks to limit the need to travel by directing new development to sustainable locations and through the prioritisation of active travel opportunities and use of public transport.
- 1.52 Whilst we support the thrust of Policy SP10, we consider that it is important for the emerging transport policy to be consistent with emerging Policy SP8 which seeks to direct over 1,500 dwellings to villages and rural areas to meet localised housing needs. These locations will have less services and facilities compared to Towns, meaning that travel would be necessary by private car.
- 1.53 It is therefore important that the need for proportionality is specifically included in the wording of the draft Policy in respect of the requirements new development is expected to ‘address’.

SP11 – Green Infrastructure and historic environment

- 1.54 We agree that the key considerations identified under emerging Policy SP11 are appropriate, however, it is essential that these considerations are approached with pragmatism and considered in the wider planning balance rather than being utilised as a pre-requisite to support otherwise acceptable development.
- 1.55 For example, retaining all trees on a development site is not always possible nor desirable in the light of wider benefits that such development can deliver, such as biodiversity net gain, meeting housing need and facilitating economic growth.

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- 1.56 We are of the opinion that the key issues identified under draft Policy SP11 should be presented as considerations that need to be addressed where necessary, rather than pre-requisites that are expected to be met.

DP46 – Homes for all

- 1.57 This policy sets out that developments of 100 dwellings or more will be required to include provision for older persons accommodation such as retirement accommodation or supported independent living as well as 5% comprising self-build plots.
- 1.58 M7 Planning Ltd **objects** to the introduction of a self-build target within draft Policy DP46. There is no legislative or national policy basis for imposing an obligation on landowners or developers of sites to set aside plots for self & custom build housing. Under the Self Build & Custom Housebuilding Act 2015 and 2021 NPPF (para 62), it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand. The Council are not empowered to restrict the use of land to deliver self & custom build housing. The NPPG sets out ways in which the Council should consider supporting self & custom build by “engaging” with developers and landowners and “encouraging” them to consider self & custom build “where they are interested”.