

**Comment ID**

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**Document Section**

- ▶ North Somerset Local Plan 2039: Pre-s... ▶ 3. Strategic Policies
- ▶ SP3: Spatial strategy ▶ SP3: Spatial strategy

**Respondent**

M7 Planning Ltd and M7 SW LLP

**Agent**

Arwel Evans - Lichfields

**Response Date**

21 Jan 2024

**Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? The requirement for a plan to be sound can be found in the National Planning Policy Framework paragraph 35.**

No

**If you selected 'no', do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be unsound because it is not:**

Positively prepared

Justified

Effective

Consistent with national policy

**Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?**

No

**Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?**

No

**If you consider the North Somerset Local Plan 2039: Pre-submission Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate then please provide details. Please be as precise as possible.**

Emerging Policy SP3 (Spatial Strategy) states:

“Priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel, particularly at locations which

are currently, or have the potential to be, well served by public transport...Residential development in areas at risk of flooding will be minimised outside the towns. The amount of development at villages and in the countryside will relate to local community needs.”

Policy SP8 sets out the distribution of housing delivery across the Local Authority area.

We consider that the two-tier settlement strategy set out by Policy SP3 does not reflect the nature of the settlements of North Somerset with all settlements apart from Weston Super Mare, Nailsea, Clevedon and Portishead considered Villages. We contend that Congresbury in respect of its function, size and connectivity performs beyond a ‘village’ and we propose the Spatial Strategy is amended to include an additional tier of settlements that are below a ‘Town’ but fulfil a function beyond a ‘Village’ – akin to the approach in the adopted Core Strategy, namely a ‘Service Village’.

Emerging policies SP3 and SP8 have not been positively prepared to meet the objectively assessed needs of the area. The policy is not effective in delivering housing in sustainable locations where there is a defined housing need. Within the context of the existing adopted Core Strategy (January 2017), Congresbury is identified as one of nine “Service Villages” (Tier 3 Settlement). The Core Strategy supports development within or adjacent to existing settlement boundaries of Service Villages, subject to proposals enhancing the overall sustainability of the settlement.

Vision 6 (Service Villages Vision) of the existing Core Strategy states that Service Villages are seen as a “focal point for local housing needs, services and community facilities” and are a crucial component in the settlement hierarchy and achieving wider delivery of housing. The aim for Service Villages within the existing Core Strategy is for them to become more self-contained in terms of providing jobs and serving the local and surrounding community for all their day-to-day needs, whilst protecting their individual character.

Emerging Policies SP3 and SP8 have diverged from the Core Strategy approach and has essentially created a two-tier settlement hierarchy as follows:

- Towns – Weston-Super-Mare (including the Wolverhill Strategic Site), Clevedon, Nailsea and Portishead.
- Villages and Rural Areas.

This two-tier settlement hierarchy fails to acknowledge that the form, nature, size and sustainability credentials of villages within the local authority boundary varies considerably

and is a step change from the adopted Core Strategy (January 2017) approach. This contradicts the Council's own evidence base on this matter as the Spatial Strategy and Capacity Paper (November 2023) states that the Council has split the villages into four different categories based on their sustainability. Congresbury has been categorised in Category A, which consists of:

"Villages considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and good public transport links to towns."

The Spatial Strategy and Capacity Paper (November 2023) also highlights that Congresbury has potential for small scale site allocations.

The "Villages and Rural Areas" account for 3,610 dwellings (23% of the housing supply, although 1275 of these are windfall sites that are not identified) with the rest of the growth coming from the towns (Weston Super Mare, Clevedon, Nailsea and Portishead) as well as the Wolverhill allocation. We consider that the settlement hierarchy does not reflect the function and form of the settlements of North Somerset and as a result, the distribution of housing is not effective in ensuring delivery over the plan period. Should the local housing need increase (in line with the standard method) then this presents additional upward pressure to amend the settlement strategy to give additional status to sustainable settlements such as Congresbury.

**Please set out any modifications you consider necessary to make the North Somerset Local Plan 2039: Pre-submission Plan legally compliant and sound in respect of any issues you have identified.**

We consider that the spatial strategy proposed by the Council is flawed and should be amended to direct further growth to sustainable and suitable locations beyond the 'towns'. The Local Plan fails the 'Justified' test of soundness as the strategy is not effective for the reasons set out above. This is compounded by the fact that the local housing need devised by the Council is inconsistent with the NPPF (test of soundness a) and d)) which has resulted in a significantly lower housing requirement.

We believe that Congresbury should be considered a higher order settlement (and not categorised with the villages and rural areas) owing to its good sustainability credentials.

This could be achieved through changing the settlement hierarchy to promote sustainable villages such as Congresbury (similar to the adopted Core Strategy (January 2017) where it is identified as a Service Village) in a new category.

**If you wish to support the soundness or legal compliance of the North Somerset Local Plan 2039: Pre-submission Plan please provide details.**

**If your representation is seeking modification to the North Somerset Local Plan 2039: Pre-submission Plan, do you consider it necessary to participate at the examination hearings?**

Yes, I wish to participate in the examinati...

**If you wish to participate in the examination hearings please outline why you consider this to be necessary.**

To discuss and explore the matters raised in the representations in more detail.

**Attachments**

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