B&NES Placemaking Plan Examination: Hearing Statement Matter 23: Rural Areas

By Barton Willmore On behalf of Emergy Limited

Representor no. 6411

August 2016



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1.0 INTRODUCTION

1.1 This Examination Statement has been prepared by Barton Willmore on behalf of Emergy Limited in respect of a development opportunity at the Former Garden Nursery, Main Road, Temple Cloud. A site plan is included at Appendix 1.

2.0 TEMPLE CLOUD ALLOCATING LAND FOR HOUSING

- 2.1 The Placemaking Plan should identify land at the Former Garden Nursery site in Temple Cloud as an allocation for residential development, which can contribute to the five year housing land supply shortfall in B&NES.
- 2.2 The site covers an area of approximately 0.49 ha and comprises of areas of hardstanding and shrubbery. The hardstanding is what remains of the former garden nursery. The developable area has the capacity for 15 dwellings at an approximate density of 30 dph. However, given the location and context the sketch layout enclosed illustrates a layout for 10 dwellings.
- 2.3 The Former Garden Nursery site is separated from the Housing Development Boundary of Temple Cloud. However, it is located adjacent to the A37, opposite a cluster of existing buildings in the area known as Cholwell. The proposed development of 10 dwellings will add to this cluster of dwellings and the site is well related to Temple Cloud being less than a 350 metre walk to the centre of the village. The site is well served by frequent bus services (376 and 379) to Bristol and Wells. The north and south bound bus stops are within a 350 metre walk from the site.
- 2.4 Technical studies have been undertaken these studies demonstrate:
 - The existing access is able to provide a safe access and egress to serve potential development;
 - There are no significant ecological constraints that are likely to affect the principle of development;
 - The area identified for development is within Flood Zone 1 (low risk of flooding).
- 2.5 A copy of the design and access statement prepared for our clients' recent planning application was submitted with our previous representation to demonstrate how the site could be developed. An additional copy of this can be provided if required by the Inspector.

3.0 HOUSING DELIVERY

- 3.1 For the B&NES Placemaking Plan to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan should be positively prepared, justified, effective and consistent with national policy. The Plan as drafted is not positively prepared and plans for the minimum housing requirement.
- 3.2 The plan is being advanced within the strategic context of the preparation of the West of England Joint Spatial Plan (JSP). The West of England Strategic Housing Market Assessment (WoE SHMA) has been published and indicates a need for housing within the area which is considerably higher than that currently being planned for. Barton Willmore's own assessment submitted on behalf of clients to the recent JSP issues and options consultation, indicates that actual housing need is significantly above the level suggested by the WoE SHMA.
- 3.3 The Plan should seek to meet an Objectively Assessed Housing Need (OAHN) for the Joint Spatial Plan area of the West of England. All Councils preparing new plans are required to comply with the Duty to Cooperate and B&NES appears to be allocating sites and working with a housing requirement that does not plan for the OAHN for the Wider Bristol Area. Unless the Placemaking Plan adopts sufficient flexibility to adapt to rapid change, it will not be sound in that it will not be consistent with national policy, justified nor positively prepared.
- 3.4 The Placemaking Plan proposes only one allocation for Cameley-Temple Cloud (Site SR24). This is a Site that has planning permission (70 dwellings). The strategy for minimal growth at Temple Cloud is not consistent with National Policy. The Draft Placemaking Plan should encourage new residential development rather than restrict. The Planning Practice Guidance (Para 001 Reference ID: 50-001-20140306) states that "blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence."

4.0 CONCLUSION

- 4.1 In summary, there are a number of issues of soundness with the Placemaking Plan including:
 - Failure to support the contribution of Cameley-Temple Cloud to delivering sustainable development and indeed adopting a negative strategy of seeking to restrict development (contrary to national policy);
 - Failure to produce a positively prepared plan which has regard to the JSP context and adopts insufficient flexibility to respond to impending rapid change (again also contrary to national policy); and
 - Failure to demonstrate the contribution of the plan to delivering a supply of market and affordable housing.
- 4.2 The Placemaking Plan should allocate further Sites for development in the Rural settlements. All settlements can pay a role in delivering sustainable development in rural areas, the plan should allocate further sustainable sites for development in the Cameley-Temple Cloud area, such as the Former Garden Nursery.

APPENDIX 1 Site Location Plan