

Engine Lane, Nailsea Planning Statement

BDW Trading Ltd (Barratt Homes)

18 April 2017

LICHFIELDS

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1.0 **Introduction**

- 1.1 This Planning Statement has been prepared by Lichfields on behalf of BDW Trading Ltd and the joint owners. It accompanies an application for full planning permission for the proposed development of 183 dwellings at land off Engine Lane, Nailsea. The application has been prepared in partnership with Nailsea Town Council who is one of the landowners.
- 1.2 An EIA screening opinion was issued by North Somerset Council on 3 February 2017 which confirms that in their opinion the proposed development does not comprise EIA development and an Environmental Statement is not required to be submitted with the planning application.

Report Structure

- 1.3 This document considers the development proposals in the context of national and local planning policy and guidance. It seeks to draw out the key determining issues and present them within the wider planning balance.
- 1.4 This Statement should be read in conjunction with the other documents that have been submitted with the planning application (see planning application covering letter for a full list).
- 1.5 This document is structured as follows:
- 1 Pre-application meetings and consultation;
 - 2 Application site and surroundings;
 - 3 Proposed development;
 - 4 Planning policy context;
 - 5 Planning policy analysis;
 - 6 S106 heads of terms; and
 - 7 Conclusion.

2.0 **Pre-Application Discussions and Consultation**

- 2.1 The applicant and the project team met with North Somerset Council's planning officer, internal council consultees and some statutory consultees, including Natural England on 15 October 2016. Key determining issues were discussed at the pre-application meeting including infrastructure constraints, ecology, playing pitches, transport, landscaping, visual impact, drainage, PROW, open space as well as s106 heads of terms.
- 2.2 Additional pre-application meetings and discussions have also been carried out with Sport England with regards to the relocation of junior rugby training pitches closer to the Nailsea and Backwell RFC clubhouse.
- 2.3 A public exhibition was held on 15 December 2016 at Nailsea Vestry Hall where the proposed scheme was discussed with members of the public. The feedback received was further used to refine the scheme. Full details of the exhibition and the feedback can be found in the Statement of Community Involvement (SCI) submitted with this planning application.
- 2.4 As the Town Council is one of the landowner, significant consultation has taken place between Barratt Homes and the Town Council. This has included workshops and meetings. Full details of the scope and quantum of consultation can be found in the enclosed SCI.

3.0 **Application Site and Surroundings**

3.1 The application site is located adjacent to but beyond the existing western settlement boundary of Nailsea. It is bound to the north by the Nailsea & Backwell Rugby Club and by properties and a farm along Netherton Wood Lane to the south. Engine Lane adjoins the site to the east, with agricultural fields abutting the western boundary of the site. The site extends to 8.4 hectares and comprises greenfield undulating land that is primarily used for grazing, with a limited stretch in the north that is used by Nailsea and Backwell Rugby Club as training pitches for juniors. There is no existing formal vehicular access into the site, although field gates are present along Engine Lane. A bridleway, within the site runs adjacent to the southern boundary of the site. A public right of way runs along, but outside the western boundary of the site.

3.2 A central area of copse and mature trees with a small pond is located in the centre of the site. There are no Tree Preservation Orders on site. The fields are divided partially by dry stone walls, hedges and trees.

Ecology

3.3 The application site comprises widespread habitats including poor semi-improved grassland, amenity grassland and hedgerows. The site has no statutory or non-statutory nature conservation designations, although it forms part of an area identified as a 'Strategic Flyway' for horseshoe bats from North Somerset and Mendips Bat Special Area of Conservation (SAC).

3.4 The Nailsea & Tickenham Moors Site of Natural Conservation Interest and the Tickenham, Nailsea and Kenn Site of Special Scientific Interest (SSSI) are located approximately 450m to the north of the site.

Trees

3.5 A Tree Report prepared by ACD Environmental states that there are no TPOs on the site. ACD Environmental surveyed a total of 53 individual trees with stem diameters of 75mm and above measured at 1.5m above ground level. In addition, 6 hedgerow and 10 groups were surveyed and recorded.

3.6 One mature Oak tree is categorised as Class A as having high individual quality and landscape value. Sixteen trees on the site are categorised as Class B, 16 individual trees and nine groups of trees which are categorised as Class C. There are 20 individual and one group of U category trees on site.

Flooding

3.7 The site is located in Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).

Archaeology and Heritage

3.8 The application site contains no above-ground Designated Heritage Assets and none are located within a 1km radius of the site which would be impacted, either physically or to their setting, by the proposed development. The nearest Listed Building is Nursebatch Farmhouse (UID 1136956) which is located approximately 500m to the west of the site.

3.9 The application site is considered by CGMS to have a low/moderate potential for as yet to be discovered non-designated archaeological remains. The southern area of the site has previously

been subject to a geophysical survey and archaeological trial trenching where no significant remains were encountered.

Local Services and Facilities

- 3.10 A wide range of existing services and facilities are located within walking distance of the site, including a Co-operative supermarket (Hannah More Road, approximately 800m from the site), a butcher (North Street, approximately 950m from the site), Hannah More Infant and Grove Junior Schools (Whiteoak Way, approximately 1km from the site) and employment opportunities at West End Trading Estate located off Engine Lane (approximately 300m from the site).
- 3.11 In addition, the site is within an easy cycle of the centre of Nailsea (approximately 1.6km) which contains a wider range of facilities, Nailsea School (approximately 1.6km), and Nailsea and Backwell railway station (approximately 2.5km). Bus stops along Hannah More Road are located within a level walk of the site access that provide regular services to Nailsea town centre, Nailsea and Backwell railway station, Bristol City Centre, Portishead, Congresbury and Weston super Mare.

4.0 Proposed Development

4.1 The proposed description of development is:

“Proposed development of 183 dwellings (Use Class C3 including affordable homes), open space (including children’s play spaces and replacement playing fields including drainage and associated infrastructure), landscaping, sustainable urban drainage, vehicular accesses, pedestrian and cycle accesses, related infrastructure and engineering works.”

Land Use

4.2 The proposal is for 183 residential dwellings comprising a range of dwelling types developed on approximately 7.3hectares of land. The mix of dwellings can be seen below:

Table 4.1 Proposed Dwellings

Type	Number	Bedrooms	Floorspace (sqm)
Open Market Housing			
Roseberry	22	2	63.1
Folkstone	11	3	77.1
Maidstone	11	3	77.1
Ennerdale	20	3	85.1
Eskdale	8	3	98.3
Norbury	13	3	102.8
Stambourne	18	3	107.4
Woodcote	6	4	112
Alderney	9	4	113.8
Radleigh	10	4	122.3
Market Sub Total	128		859
Affordable (Social Rented)			
Apartment 38/39 GF	4	1	46.2
Apartment 38/39 FF	4	1	58.5
House Type 51	14	2	78.2
House WHDG 2B*	3	2	105
House Type 52	10	3	86
House Type WHDG 3B*	2	3	127.7
House Type 54	8	4	102.6
Affordable (Shared Ownership)			
Apartments 38/39 GF	2	1	46.2
Apartments 38/39 FF	2	1	58.5
House Type 51	3	2	78.2
House Type 52	3	3	86
Affordable Sub Total	55 (30%)		873.1
Total	183		1,732.1

Affordable Housing Statement

- 4.3 Of the 183 dwellings proposed, 55 would be affordable housing units. This would provide an on-site contribution of 30% affordable homes, in line with Policy CS16 of the adopted Core Strategy.

Table 4.2 Affordable Housing Split

Type	Number	Bedrooms	Floorspace (sqm)
Affordable (Social Rented)			
Apartment 38/39 GF	4	1	46.2
Apartment 38/39 FF	4	1	58.5
House Type 51	14	2	78.2
House WHDG 2B*	3	2	105
House Type 52	10	3	86
House Type WHDG 3B*	2	3	127.7
House Type 54	8	4	102.6
Affordable (Shared Ownership)			
Apartments 38/39 GF	2	1	46.2
Apartments 38/39 FF	2	1	58.5
House Type 51	3	2	78.2
House Type 52	3	3	86
Affordable Sub Total	55 (30%)		873.1
Total	183		1,732.1

Source: Barratt Homes

- 4.4 The proposed tenure split is also in accordance with Policy CS16 of the Core Strategy:

Table 4.3 Tenure Split

Tenure	Number	Percentage
Social Rented	45	82%
Intermediate Housing	10	18%

- 4.5 The development includes 1 bedroom apartments, two, three and four bedroom dwellings. The ground floor apartments would be suitable for wheelchair users.
- 4.6 The precise breakdown of house types, tenure, number of bedrooms and floorspace for both affordable units and the market units is set out in table 3.1 above and shown on the schedule attached to the Site Layout Plan (B.0443_12 Rev F).
- 4.7 The location of affordable housing within the development is distributed across the site. The affordable units will be fully integrated with market housing within the scheme and will create a fully inclusive, mixed and balanced community in accordance with the aims of Policy CS16.
- 4.8 The affordable houses will be delivered through a Registered Provider. At this point in time the provider is unknown. Barratt Homes is currently tendering the units out to interested parties. Details of the registered provider will become clear during determination.
- 4.9 All Barratt Homes (market and affordable) are built to Lifetime Homes standard and Housing Quality Standards. Lifetime Homes are designed to allow people of all ages to live within the

houses with no requirement to adapt the dwelling. Five of the affordable units are specially designed for residents who require the use of a wheelchair.

- 4.10 Details of the affordability of shared ownership dwellings will again be determined during determination once a Registered Provider has been chosen to take on the affordable units.

Access and movement

- 4.11 Vehicular access will be obtained from two connection points off Engine Lane.
- 4.12 The proposed development will provide the necessary pedestrian and cycle infrastructure to ensure that walking and cycling is encouraged.
- 4.13 An existing bridleway running along the southern boundary will be retained and integrated into the development.
- 4.14 It is proposed that PROW LA13/5/20 is diverted. The Site Layout drawing shows the alignment of the diverted PROW. The PROW continues to provide a route from Engine Lane to the junction of PROW LA13/6/20 but on a different alignment. The proposed diversion envisages the PROW to run through the residential part of the site.
- 4.15 It is also proposed to divert PROW LA13/6/20 so that it runs parallel with the western boundary of the site instead of veering off at a 45 degree angle to the south west. A gap has been left in the proposed hedge to allow the existing alignment of the PROW to be used until permission is obtained to divert it under separate consent regime.

Density

- 4.16 The proposed development achieves a density of 44 dwellings per hectare. The mix of detached, semi and small terraced units will create a varied settlement pattern that seeks to integrate with the adjacent existing dwellings along the western edge of Nailsea.

Scale

- 4.17 The proposed dwellings range from one bedroom flats to two, three and four bedroom houses and are predominantly two to two and a half storeys in height with some three storey dwellings. This is to reflect the existing nearby residential context.

5.0 **Planning Policy Context**

5.1 In accordance with paragraph 38 (6) of the Planning and Compulsory Purchase Act 2004, regard should be had to the development plan for the determination of planning applications, unless material considerations indicate otherwise.

5.2 The planning policy framework relevant to the determination of the planning application is as follows:

North Somerset Adopted Core Strategy

5.3 The Core Strategy for North Somerset Council (NSC) was adopted on 10 April 2012. Following a legal challenge a number of key policies were remitted for re-examination, including Policy CS13 which addresses 'Housing Requirement'. The policies were re-examined and the fully re-adopted Core Strategy incorporating the changes recommended to the remitted policies was approved on 10 January 2017.

5.4 Lichfields considers the following Core Strategy policies relevant to the determination of this planning application:

- CS1 (Addressing climate change and carbon reduction);
- CS2 (Delivering sustainable design and construction);
- CS3 (Environmental impacts and flood risk assessment);
- CS4 (Nature conservation);
- CS5 (Landscape and the historic environment);
- CS7 (Planning for waste);
- CS9 (Green infrastructure);
- CS10 (Transportation and movement);
- CS11 (Parking);
- CS12 (Achieving high quality design and place-making);
- CS14 (Distribution of new housing);
- CS15 (Mixed and balanced communities);
- CS16 (Affordable housing);
- CS26 (Supporting healthy living and the provision of health care facilities);
- CS27 (Sport, recreation and community facilities);
- CS31 (Clevedon, Nailsea and Portishead);
- CS34 (Infrastructure delivery and development contributions);

Sites and Policies Plan Part 1: Development Management Policies

5.5 The Development Management Policies Plan was adopted on 19 July 2016. Lichfields considers the following policies to be relevant to the determination of this planning application:

- DM1 (Flooding and drainage);
- DM2 (Renewable and low carbon energy);

- DM6 (Archaeology);
- DM8 (Nature conservation);
- DM9 (Trees and woodlands);
- DM10 (Landscape);
- DM19 (Green infrastructure);
- DM24 (Safety, traffic and provision of infrastructure, etc. associated with development);
- DM25 (Public rights of way, pedestrian and cycle access);
- DM27 (Bus accessibility criteria);
- DM28 (parking standards);
- DM32 (High quality design and place-making);
- DM34 (Housing type and mix);
- DM35 (Nailsea housing type and mix);
- DM36 (Residential densities);
- DM48 (Broadband);
- DM68 (Protection of sporting, cultural and community facilities);
- DM70 (Development infrastructure);
- DM71 (Planning obligations);

North Somerset Replacement Local Plan (2007)

5.6 Most of the Replacement Local Plan policies have been replaced by the Core Strategy and the Development Management Policies. However some policies are still extant and relevant to the determination of this application:

- H/7: Residential development within settlement boundaries;

(Emerging) Sites and Policies Plan Part 2: Site Allocations Plan

5.7 The Site Allocations Plan (SAP) is currently being prepared by North Somerset Council. It was submitted to the planning inspectorate for examination on 24 February 2017.

5.8 The plan sets out the allocations required in order to deliver the policies set out in the Core Strategy.

5.9 Schedule 1 of the draft SAP allocates the application site for residential development and states that it has a capacity of up to 195 dwellings. Site specific considerations comprise:

- New allocation;
- Access off Engine Lane;
- Strong hedge boundaries to be retained;
- Footpath on western side of Engine Lane;
- Full Transport Assessment required;
- Replacement or improved sport facilities required;
- Housing mix to meet local needs;
- Consideration of fact that site is within 5km consultation zone for Bats SAC.

(Emerging) West of England Joint Spatial Plan

5.10 The JSP is currently being prepared by the four west of England councils (Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire). The second consultation on the JSP took place in the autumn of 2016 and it is expected that an updated draft proposal is published in the summer of 2017. Due to the early stage of preparation only limited weight can be afforded to the emerging JSP.

5.11 The JSP consultation document identifies Nailsea/Backwell as a Strategic Development Location with an indicative capacity of up to 3,600 dwellings. The document states:

“Development is anticipated to take place generally to the west of Nailsea and Backwell which will bring significant challenges in terms of transport delivery, but avoids the Green Belt and principal flood zone areas.”

Supplementary Planning Documents

5.12 The following locally adopted documents are material considerations and have been considered as part of the application submission:

- Affordable Housing;
- Biodiversity and Trees;
- Creating Sustainable Buildings and Places;
- Development Contributions;
- Landscape Character Assessment;
- Parking Standards;
- Residential Design Guide;
- Travel Plan.

National Planning Policy Framework

5.13 Lichfields considers the following chapters of NPPF are relevant in the determination of this application:

- Chapter 1 (Building a strong, competitive economy);
- Chapter 4 (Promoting sustainable transport);
- Chapter 6 (Delivering a wide choice of high quality homes);
- Chapter 7 (Requiring good design);
- Chapter 8 (Promoting healthy communities);
- Chapter 11 (Conserving and enhancing the natural environment).

Planning Practice Guidance

5.14 Lichfields considers the following sections of the PPG relevant to the determination of this application:

- Design;
- Flood risk and coastal change;
- Natural environment;
- Open space, sports and recreation facilities, public rights of way and local green space;

- Planning obligations;
- Open space, sports and recreation facilities, public rights of way and local green space;
- Travel plans, transport assessments and statements;
- Use of planning conditions;
- Water supply, wastewater and water quality.

Sport England

5.15 Sport England’s policy position is set out in ‘*A Sporting Future for the Playing Fields of England*’. Policy P1 states:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies”

5.16 The two specific circumstances relevant to the application proposal are E3 and E4. E3 states:

“The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing areas of any playing pitch or the loss of any other sporting/ancillary facilities on the site.”

5.17 Specific Circumstance E4 states:

“The playing field or playing fields, which would be lost as a result of the proposed development, would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development.”

5.18 Whilst Sport England is a statutory consultee, their policy position does not form part of the statutory development plan and Sport England’s position comprises a material consideration.

Key Policy Considerations

5.19 Taking into account the planning policy framework, the key policy considerations for the proposed development are as follows:

- Is the principle of development of this site for residential purposes acceptable?
- Is the proposal considered sustainable development?
- Open Space Assessment - Does the proposal provide replacement playing fields which are of equivalent or better provision to the fields being lost?
- Does the proposal conserve and enhance the natural environment?
- Is the proposal considered good design?

5.20 Other policy considerations are as follows:

- Can satisfactory access to the site be obtained?
- Can the site be satisfactorily drained?
- Can the water main and electricity line crossing the site be dealt with?

6.0 Planning Policy Analysis

Key Policy Considerations

1. Is the principle of development of this site for residential purposes acceptable?

- 6.1 Policy CS14 of the Core Strategy states that *“the three towns of Clevedon, Nailsea and Portishead act as service centres for their surrounding areas and will be the focal points for locally significant scales of development, including provision for the majority of district housing provision outside of Weston.”*
- 6.2 Policy CS14 states that 5,100 net additional dwellings should be delivered in Clevedon, Nailsea and Portishead with Policy CS31 clarifying that 1,100 should be delivered in Nailsea. The Core Strategy does not set out allocations for the delivery of this requirement. This is left to the Site Allocations Plan which was submitted for examination on 24 February 2017. Hearing sessions are expected to begin shortly. The plan is therefore considered to be at a relatively advanced stage of preparation and can therefore be afforded some weight in the determination of this application in accordance with paragraph 216 of the NPPF. A report to the Executive of North Somerset Council¹ recommended that the Publication Version of the SAP should be approved for public consultation and that the Publication version should be given weight in assessing development proposals. [Our emphasis]
- 6.3 Nailsea is also identified in the emerging West of England Joint Spatial Plan as a Strategic Development Location for 3,600 units. The JSP states that the direction of growth will be to the west of Nailsea due to constraints in other directions.
- 6.4 The site is allocated in the emerging SAP as a housing site that will deliver up to 195 dwellings. It is the second largest housing allocation in Nailsea and accounts for 24% of the housing allocated for Nailsea.
- 6.5 The specific Vision for Nailsea in the adopted Core Strategy is for it to become a thriving, prosperous settlement and local service centre by 2026 which provides for both its population and that of the rural hinterland. We consider that the proposed development has a fundamental role to play in achieving the above Vision which is evidenced in the emerging Site Allocations Plan.
- 6.6 The SAP sets out a number of criteria that need to be considered when developing the site. These will be discussed in detail later in this Statement but are summarised below.

Table 6.1 Engine Lane SAP Criteria

Criteria	How does the proposed development respond?
Access off Engine Lane	Two accesses are proposed off Engine Lane
Strong hedge boundaries to be retained	Hedge boundaries will either be retained or where not possible replaced with new hedges
Footpath on western side of Engine Lane	This is being proposed
Full Transport Assessment required	This is included in the submission
Replacement or improved sport facilities required	Replacement facilities form part of the proposals and enhancements to existing facilities facilitated
Housing mix to meet local needs	Wide range of market and affordable housing to meet

¹ Meeting Date (18th October 2016)

Criteria	How does the proposed development respond?
	local needs. Housing mix has been developed in conjunction with the Town Council
Consideration of fact that site is within 5km consultation zone for Bats SAC	On and off site mitigation proposed in order to ensure no negative effects on the Bats SAC

Source: Site Allocations Plan (Publication Version)

- 6.7 The development brought forward by Barratt Homes is in accordance with the emerging Site Allocations Plan and is consistent with the direction of travel in respect of the emerging Joint Spatial Plan.
- 6.8 The pre application response received from the Council confirms that the principle of residential development at this site is acceptable. It states:
- “This site is considered to be readily available, in a sustainable location and its full capacity is included within the Council’s 5 year housing assessment.”*
- 6.9 We consider that the principle of residential development at the application site is acceptable and is supported by the proposed allocation in the emerging Site Allocations Plan as well as the emerging JSP.

2. Is the proposal considered sustainable development?

- 6.10 North Somerset Council is unable to demonstrate a five year housing land supply. In respect of the appeal² at Sandford determined on the 12 October 2016, the Inspector concluded:
- “...that on the evidence presented to the Inquiry the Council is not currently able to demonstrate a robust, deliverable five-year supply of housing land in accordance with the advice in NPPF and particularly paragraph 47 and Footnote 11. Paragraph 49 of the NPPF is engaged accordingly and the application should be considered in the context of the presumption in favour of sustainable development.”*
- 6.11 Paragraph 49 of the NPPF is clear that where a Local Authority cannot demonstrate a 5 year housing land supply, relevant housing policies should be treated as out of date and the application should be considered in the context of sustainable development. The Council’s pre application advice confirms that this is the case:
- “Following recent appeal decisions it has been concluded that the Council is unable to demonstrate a 5 year supply of housing. Therefore in accordance with Para 14 of the NPPF the settlement boundary and relevant housing policies are considered out of date and there is a presumption in favour of sustainable development unless ‘any adverse impacts of doing so would significantly and demonstrably outweigh the benefits’ .”*
- 6.12 Paragraph 14 of the NPPF states that the presumption in favour of sustainable development should be seen as a golden thread running through both plan making and decision making. The NPPF states that there are three dimensions to sustainable development: economic, social and environmental:

² APP/D0121/W/15/3139633 (Land to the north of A368, Sandford, North Somerset, BS25 5QB)

Economic

- 6.13 The NPPF states that the planning system needs to contribute to a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available on the right places and the right time to support growth and innovation. The application site is an important component in the delivery of the Vision for Nailsea – to become a thriving and prosperous settlement.
- 6.14 The development will provide significant economic benefits to the local community. These benefits include:
 - 1 Construction jobs for local people;
 - 2 Increased council tax payments to the council;
 - 3 Increased spending in the local area as new homeowners seek to personalise their new property; and
 - 4 Spending on weekly goods at local shops and businesses by the new residents.
- 6.15 It is clear that the proposal will fulfil an economic role supporting growth and innovation.

Social

- 6.16 The NPPF states that the social role of sustainable development should support strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and supports its health, social and cultural well-being.
- 6.17 Nailsea is a sustainable settlement that benefits from a wide range of existing services and facilities such as shops, schools, medical facilities and leisure facilities. The site is also in a sustainable location with regards to services and facilities. Within 800 m of the site there is a Co-op convenience store, a butcher, allotments, playing fields and employment opportunities (Blackfriars Road). The nearest primary school is Hannah More Primary and Infant School which is less than 1km away. The proximity of facilities is shown in the table below:

Table 6.2 Local Facilities and Services

Facility/Service	Approximate Distance from site (metres)
Playing Fields (Rugby/Cricket)	Adjacent to site
Allotments	220
Employment Site (Blackfriars)	300
Coop Convenience Store	800
Bus Stop (Hannah More Road)	450
Hannah More Primary and Infant School	900
Butcher	1000
Nailsea Secondary School	2000
Nailsea/Backwell Train Station	2900

Source: Lichfields Analysis

- 6.18 The proposal will positively integrate with the existing built form and pedestrian connectivity between the site and the existing settlement will be promoted via two site access points as well as the bridleway access point.

- 6.19 The proposal includes 55 affordable dwellings in line with the 30% policy requirement. These dwellings vary from 1 bedroom flats to 4 bedroom houses. 82% are social rented and 18% are intermediate rented in terms of tenure. The housing mix has been developed by Barratt Homes in partnership with the Town Council in order to meet local needs. This is in accordance with Policy DM35 of the Development Management Plan which states that new housing developments in Nailsea should contain some or all of the following categories:
- 1 One bedroom properties;
 - 2 2-3 bedroom properties aimed at young families
 - 3 A range of 2-3 bedroom properties, including houses, apartments and bungalows, aimed at people downsizing from larger properties.
 - 4 Age restricted retirement properties.
- 6.20 The proposal provides one bedroom properties, 2-3 bedroom properties as well as apartments.
- 6.21 The site provides extensive public open space areas that will assist in maintaining the health and wellbeing of new residents and residents currently living in the locality. The provision of replacement new playing fields that will be available for use to by the wider community will provide an opportunity for more local participation in sports which will have a consequential positive impact on health.
- 6.22 It is clear that the proposals fulfil a social role in providing a supply of housing to meet the need of present and future generations. The built form will be of a high quality with accessible local services in close proximity.

Environmental

- 6.23 The NPPF states that the environmental element of sustainable development is for proposals to contribute to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity.
- 6.24 In isolation, it is considered that there would be no risk or probability of a Likely Significant Effect on the integrity of North Somerset and Mendip Bats SAC; however, there are potential in-combination effects if other green-field developments in the vicinity were implemented. This effect could be addressed through the implementation of a strategic mechanism to provide foraging habitat within an appropriate timeframe. Indeed, Financial contributions will be sought by the Council seeking to implement the above strategic mitigation measures.
- 6.25 Long-term, Sub-Parish adverse effects are predicted for badger and brown hare; these effects would not be significant. Short-term, Sub-Parish adverse effects are predicted for invertebrates, amphibians, nesting birds, bats, and hedgehog; these would decrease to neutral or minor (Sub-Parish) beneficial in the medium-term onwards.
- 6.26 Overall, it is considered that the proposed development would protect, maintain and enhance the biodiversity interest of the site in accordance with policies concerning the conservation of biodiversity in the National Planning Policy Framework (2012) and the relevant policies of the North Somerset Core Strategy.

Conclusion on sustainable development

- 6.27 It is clear that the application proposal would bring significant social and economic benefits without negative environmental effects. The proposal is entirely in accordance with NPPF's definition of sustainable development.

6.28 In the absence of an acknowledged five year housing land supply which has rendered the relevant housing policies out of date (paragraph 49 NPPF), planning permission should be granted in respect of the application proposal without delay. It is clear that granting permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in NPPF (Paragraph 14 NPPF).

6.29 In any event, the Council's pre-application advice states:

"Irrespective of the position on housing land supply it is considered that the proposal accords with policy, in particular policy CS31 and that this is sufficient to outweigh other considerations."

3. Open Space Assessment - Does the proposal provide replacement playing fields which are of equivalent or better provision to the fields being lost?

6.30 Policy CS27 of the Core Strategy states that existing facilities will be safeguarded from alternative use unless suitable alternative facilities can be made available or the existing facilities are surplus to requirements.

6.31 Paragraph 74 of the NPPF states that existing open space, including playing fields should not be built on unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

6.32 Paragraph E4 of Sport England's Planning Policy Statement states that Sport England will oppose the granting of planning permission for any development which would lead to the loss of all or any part of a playing field unless the fields to be lost would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements.

6.33 The emerging Site Allocations Plan allocates land west of Engine Lane as a residential allocation. The allocation is predicated on the fact that some playing fields will need to be developed in order for a meaningful development to be achieved. The supporting text for the allocation states that "*replacement or improved sport facilities [are] required*". The allocation area boundary incorporates the playing fields area that is to be lost.

6.34 The masterplan for the proposed development has been developed in partnership with Nailsea Town Council and Nailsea and Backwell Rugby Club and has the full backing of both organisations.

6.35 The proposed development would result in the loss of the fields located to the south of the existing training pitches which comprise two distinct parcels. The western portion which extends to approximately 3,200sq m is not used for formal recreational purposes as confirmed by the Rugby Club owing to steeper topography unsuitable for playing purposes and very poor drainage (the south western portion falls away at a gradient of nearly 10%, see drawing B.0443_09). This parcel does however appear to be potentially valuable for informal recreational use by namely dog walkers. This area of land sits comfortably within the definition of land incapable of forming, or forming part of a playing pitch (Sport England Policy E3).

6.36 In any event, the proposed redevelopment proposals seek to compensate the loss of the above land used for informal recreational walking purposes with a central green infrastructure (GI) corridor running along a north-south axis on land further south – please see the enclosed masterplan. The proposed GI corridor and all useable green spaces within the redevelopment site extends to 2.2ha (22,000sq m) and it is envisaged that these areas will be used extensively by dog walkers. The central GI Corridor will have recreational paths running alongside water

features connecting the existing bridle way to the south to the off-site Public Right of Way to the north west of the Rugby Club.

- 6.37 The eastern portion of the redevelopment land is used by the Rugby Club for junior training purposes and extends to approximately 9,000sq m. The development proposals seek to replace the entirety of this area used for playing purposes. The replacement fields will be located between the eastern boundary of the existing adult pitches and Engine Lane.

Quality of replacement playing fields

- 6.38 The playing fields that are to be replaced are generally of poor quality.
- 6.39 The replacement fields will be constructed to a higher standard than the existing fields. The proposed new pitches as well as their respective run off areas will be constructed to Sport England's standards. All new pitches will be sprayed with herbicide, cut and filled to the required levels, re-spread with topsoil and installed with main, lateral and secondary drainage. The new pitches will be maintained for a period of 12 months by the pitch contractor in order to maintain the condition of the new pitches and to allow them to bed in. This will include rolling, cutting, fertilising, vertidrainage, seeding, weed killing, spraying of pesticide, applying top dressing as well as pitch marking. After the initial 12 months the pitches will be maintained by the rugby club.
- 6.40 The enclosed document prepared by NBRFC submitted for information purposes only analyses the total playing hours on the playing fields that will be redeveloped as well as the playing hours lost due to unplayable pitches. This analysis looks at a period between the 2012/13 and 2015/16 seasons. The below key headlines relate to the usable areas proposed to be replaced as part of the development proposals:
- 1 NBRFC sought to use the pitches on 96 occasions which equates to 14,689 man hours;
 - 2 Of the potential usage, 2,016 playing hours (14%) was lost due to unplayable pitches;
 - 3 The provision of replacement pitches with good drainage is likely to result in 1,023 hours of additional play time, which broadly represents a 50% improvement on play time lost due to unplayable pitches;
 - 4 Improved floodlighting on existing training pitches is likely to result in an additional 577 hours per season.
- 6.41 In total therefore the proposed development proposals are likely to result in 1,600 hours of additional playing time per season.
- 6.42 Given the location of Nailsea and Backwell Rugby Club it is logical that any financial contribution required towards playing facilities be directed towards the facilities at the rugby club. We understand that the Club aims to use this contribution towards the purchase of mobile floodlights that would allow more playing time in the winter. Investment could also be directed towards the changing rooms which are currently sub-standard and not fit for modern play, for example there are no separate changing rooms for junior, male and female players. The delivery of an extension to the clubhouse that will future proof the Club is seen as a once in a generation opportunity by the Club Members and will clearly have a significant positive effect in respect of widening the opportunities for participation in sport.
- 6.43 The replacement pitches represent a clear enhancement in terms of quality which will ensure that the pitches are playable even during inclement weather. The replacement fields are in accordance with Sport England policy E4 in terms of quality.

Quantitative replacement of playing fields

- 6.44 The replacement new playing fields extend to 9,055sq m and are equivalent in quantum to the playing pitches that will be lost (9,000sq m). These new playing fields will include 5 new playing pitches of varying sizes to cater for a range of junior age groups. The quantitative replacement of playing fields is demonstrated on plan reference GL0438 - 03D.
- 6.45 The playing fields used for formal recreational purposes will be replaced on an equivalent quantitative basis. The proposal is therefore in accordance with Sport England policy E4 in terms of quantity.

Location of replacement playing fields

- 6.46 The replacement playing fields are proposed to be located between the existing adult rugby pitches and Engine Lane. The replacement fields are located closer to the clubhouse than the fields that are to be lost. This is a benefit as there will be less distance to walk from the changing rooms to the fields for players, officials and spectators. Spectators will also be able to view the matches from the clubhouse balcony. The replacement pitches are in a suitable location as is required by Policy E4 of Sport England's Planning Policy Statement.

Management arrangements of replacement playing fields

- 6.47 The replacement playing fields will be transferred to the rugby club and will therefore be managed by the rugby club in the same manner that the existing fields are managed. The replacement playing fields will therefore have equivalent management arrangements to the fields that are being lost as a result of the development. The proposal satisfies the 'management' element of Sport England policy E4.
- 6.48 The replacement pitches will also be made available for use by the wider community outside of formal training sessions.

Conclusion on Playing Fields

- 6.49 It has been demonstrated that the proposed development is in full accordance with Sport England Policy E4. The playing fields used for formal recreational purposes would be replaced by playing fields which are of better quality, equivalent quantity, in a suitable location and subject to equivalent management arrangements.
- 6.50 In respect of the use of the playing fields incapable of forming part of a playing pitch but used for informal recreational purposes namely by dog walkers, the replacement proposals are vastly in excess of the area lost and specifically designed for ease of access.
- 6.51 It is also considered that the proposal is in accordance with paragraph 74 of the NPPF and policy CS27 of the Core Strategy.

4. Does the proposal conserve and enhance the natural environment?

- 6.52 Policy CS4 of the Adopted Core Strategy states that the biodiversity of NSC will be maintained and enhanced by:
- 6.53 *"Seeking to ensure that new development is designed to maximise benefits to biodiversity, incorporating, safeguarding and enhancing natural habitats and features and adding to them where possible, particularly network of habitats."*
- 6.54 Policy CS5 is also relevant and states that

“The character, distinctiveness, diversity and quality of North Somerset’s landscape and townscape will be protected and enhanced by the careful, sensitive management and design of development.”

6.55 Chapter 11 of the NPPF is also an important consideration as it states that the planning system should contribute to and enhance the natural and local environment.

Landscape & Visual Impact

6.56 The LVIA concludes that in terms of landscape character the site is of low value as it represents an area of land on the existing urban edge of Nailsea and it is not the subject of any national or local landscape designations. Development will represent a negligible impact on the broad surrounding landscape type, and will provide positive enhancement in terms landscape elements, amenity and biodiversity.

6.57 In terms of visual impact the LVIA concludes that due to the combination of topography, vegetation and urban edge, views of the site were possible from a limited number of locations. The landform and vegetation provide the site with a natural seclusion, removing middle distant views, and only allowing longer distant views from the south and southwest and from across the flood plain from Tickenham. The site is thus visually enclosed within what is in practice a very limited Zone of Visual Influence.

6.58 The LVIA confirms that in terms of landscape and visual impact there are no reasons why this land is not suitable for development.

Ecology

6.59 The ecological impact assessment prepared by EAD concludes that the proposed development in isolation would not present a significant effect on the integrity of North Somerset and Mendip Bats SAC; however, the assessment considers there are potential in-combination effects if other green-field developments in the vicinity were implemented. This effect could be addressed through the implementation of a strategic mechanism to provide foraging habitat within an appropriate timeframe.

6.60 Through pre-application discussions agreement has been reached to make available financial contributions to the Council proportionate to the habitat creation required to off-set the net loss of greater horseshoe habitats.

6.61 In the longer term the assessment at a Sub-Parish level predicts adverse effects for badger and brown hare; however these effects would not be significant. In the short-term, Sub-Parish adverse effects are predicted by the assessment for invertebrates, amphibians, nesting birds, bats, and hedgehog; these however would decrease to neutral or minor (Sub-Parish) beneficial in the medium-term onwards.

6.62 Overall, the EAD assessment concludes that the proposed development would protect, maintain and enhance the biodiversity interest of the site in accordance with policies concerning the conservation of biodiversity in the National Planning Policy Framework (2012) and the relevant policies of the North Somerset Core Strategy.

5. Is the proposal considered good design?

6.63 Policy CS12 of the Core Strategy states that high quality architecture and urban design will be sought from development. New development should function well; supporting sustainable land uses and seek to improve the image of the area. Proposals should demonstrate sensitivity to the existing local character and demonstrate a commitment to designing our crime.

6.64 The NPPF echoes this and states that the Government attaches great importance to the design of the built environment. Para 56 states:

“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”

6.65 Whilst the design of the site is fully discussed in the Design and Access Statement, we provide a brief summary of the key design principles that have been incorporated into the development:

- Houses fronting onto the public open space in order to provide natural surveillance;
- Permeable site which promotes walking and cycling;
- Internal road layout design to ensure low traffic speed;
- Medium to high density development to ensure the efficient use of land;
- Variety of house types and sizes, material treatment and boundary treatments to create interest and character;
- High quality multifunctional open space facilities that seamlessly integrate into the development;
- Incorporation of the existing network of pedestrian connections within the development proposals;
- Retention of existing landscape features where possible such as trees, hedges and stone walls;
- Ball stopping fence to stop rugby balls being kicked into the back gardens of the proposed housing.

Other Policy Considerations

1. Can satisfactory access to the site be obtained?

6.66 Policy CS10 of the Core Strategy states that development proposals that encourage an improved and integrated transport network and allow for a wide choice of modes of transport as a means of access to jobs, homes, services and facilitates will be encouraged and supported. The supporting text (para 3.152) states that layouts and land use distributions must be based on a network of cycleways/footpaths and public transport routes that ensure safe, convenient and direct access to local services.

6.67 Paragraph 32 of NPPF states that safe and suitable access to the site can be achieved for all people.

Vehicular access and traffic generation

6.68 The residential element of the site is proposed to be accessed via two simple priority junctions onto Engine Lane as shown on drawing ‘Proposed Site Accesses’ 10144/200 revision C. Both access locations can provide a Manual for Streets (MfS) compliant vehicular accesses. There are no changes proposed to the access to the sports facilities onto West End Lane as the proposal would not lead to any significant increase in traffic generation of this component of the development.

6.69 In terms of traffic impact the Transport Assessment concludes that there would not be an unacceptable impact at any of the key junctions (including North Street/Engine Lane and Engine Lane/St Mary’s Grove) and that all would operate with minimal additional queuing or delays due to the development.

Pedestrian access

- 6.70 The Transport Assessment advises that there are a range of services and amenities available including employment opportunities at the West End Trading Estate, a primary and junior school, leisure and recreation facilities including a sports centre, and a convenience store. In addition, the site is within an easy cycle of the centre of Nailsea with a wider range of facilities, Nailsea School, and Nailsea and Backwell railway station.
- 6.71 Given the close proximity of these services it is evident that the proposal is sustainably located hence maximising the potential use of non-car borne modes for a variety of trip purposes.
- 6.72 Pedestrian access to the dwellings would be along pavements parallel to the two site accesses. Access would also be provided via an existing bridleway located along the southern boundary. The site will be permeable in terms of its design and pavements will be located adjacent to both sides of the road where possible to promote safe walking. The development has been designed in order to reduce car speed and to promote walking and cycling. Informal paths are proposed through the public open space. A PROW runs from the northern site access to a location to the south of the pump station in the west.

Public Transport

- 6.73 The Transport Assessment (TA) confirms that there is direct access by bus from/to the site on a good frequency along Hannah More Road. The services set out in the TA combine to provide a service to / from Bristol via Nailsea town centre every quarter hour during the day falling to half hourly in the evening.
- 6.74 Nailsea and Backwell railway station is located approximately 3km from the application site. This station provides (approximately 2 trains per hour) to Bristol to the north and Exeter via Yatton, Worle, Bridgwater and Taunton to the south.
- 6.75 It has been demonstrated that safe and suitable access to the site can be obtained for vehicles, pedestrians and cyclists. It has also been demonstrated that the traffic impact is insignificant at all the key junctions in the vicinity of the site and that the site has good access to public transport.

2. Have flood risk and drainage issues been considered?

- 6.76 The application site lies within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)). The site also has a low risk of surface water flooding.
- 6.77 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by Phoenix Design and Quod Consult and accompanies this planning application. Flood risk from all sources (sea, fluvial, pluvial, surface water, sewers, groundwater, artificial) has been assessed by the FRA and it has been demonstrated that the proposed development will not be at risk from flooding from these sources.
- 6.78 The proposed development is therefore considered to be in accordance with Policy DM1 of the Development Management Policies Plan which states that all development must consider its vulnerability to flooding, taking account of all sources of flood risk and the impacts of climate change up to 100 years ahead.

Foul Sewage

- 6.79 The Drainage Strategy proposes to drain the site to an existing Wessex Water adopted foul sewer approximately 170 metres to the north of the site. Wessex Water has confirmed a pumping

station and associated rising main is the most practical foul drainage solution. Furthermore, Wessex Water has provided a budget proposal to construct the required drainage under a formal requisition agreement. Foul sewage can therefore be adequately dealt with.

Surface Water Drainage

- 6.80 The Flood Risk Assessment (FRA) prepared by Quod Consult advises that the proposed development has been assumed to contribute a 60% area of impermeability. Maximum discharge is to be limited to 4.2l/s/ha and done so at a controlled rate to the existing ditch network to the north west of the proposed site. The site is split into two areas, each draining to a pond via traditional gravity method. Pond A then discharges into Pond B at a controlled rate before final connection to the watercourse. Both attenuation ponds have been proposed with 0.3m freeboard and a new ditch proposed as an onward connection to the existing. The new ditch will additionally benefit the water quality by assisting in the removal of contaminants prior to outfall to the existing watercourse.
- 6.81 It is expected to soakaway as much as possible and utilise the ditch network for any additional requirement in extreme events in line with the NPPF order of preference. Surface water can therefore be adequately dealt with.

3. Infrastructure constraints

- 6.82 An existing 450mm trunk main will be diverted from within the development site and is proposed to be located along the Engine Lane boundary. The diverted water main and its respective easement have been incorporated into the development.
- 6.83 33kV and 11kV overhead lines currently cross the site. These will be diverted / grounded within the new development. The diverted electricity main and its respective easement have been incorporated into the development. The diversion is required as part of the Hinckley Point undergrounding scheme. However the undergrounding of cables can be done ahead of the Hinckley Point scheme.
- 6.84 A new native hedgerow is proposed to be relocated between the respective easements along Engine Lane.
- 6.85 Discussions between Barratt Homes and the service providers have confirmed that the diversions required can be delivered.

7.0 **S106 Heads of Terms**

7.1 It is essential, that in accordance with section 122 of the CIL Regulations (as amended) that came into effect on 6 April 2011 that s106 obligations are:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

7.2 The proposed development includes the provision of:

- Affordable Housing (30%, see Affordable Housing Statement above);
- 2 public open space areas that include children's play areas;
- A sustainable urban drainage system;
- Formal landscaping;
- Replacement playing fields with associated drainage;

7.3 We understand that financial contributions will be sought for the following elements.

- Woodland;
- Conservation sites (proportionate to the habitat creation required to off-set the net loss of greater horseshoe habitat);
- Library;
- Education (secondary only);
- Youth Facilities.

7.4 The precise value of these contributions will be determined during the determination period. We are advised by the Council that there is adequate primary school capacity in Nailsea to accommodate the needs generated by the proposed development and that a financial contribution towards this will not be required unless circumstances change.

7.5 The applicant will be facilitating the development of a new extension to Nailsea and Backwell Rugby Club to ensure that the limited sub-standard facilities are enhanced and increased in order to accommodate the additional need that will be generated as a result of the development. These proposals will be funded directly by the applicant and it has been agreed with the Council that these works can be accepted in lieu of playing pitches contributions.

7.6 Barratt Homes requests that the s106 contributions be directed towards the town of Nailsea's administrative area.

8.0 Conclusion

- 8.1 This Planning Statement has been submitted to accompany a full planning application for the proposed development of 183 dwellings (Use Class C3 including affordable homes), open space (including children's play spaces), replacement playing fields, sustainable urban drainage, vehicular access, pedestrian and cycle accesses, pumping station and associated engineering and landscaping works.
- 8.2 The site is allocated for residential development in the Publication Version of the Site Allocations Plan and the proposed development is entirely in accordance with the principles set out in this emerging plan.
- 8.3 The application site is sustainably located which is evidenced through the draft allocation. The proposed development presents a sustainable form of development.
- 8.4 The development of this site will provide a range of benefits including:
- 183 new homes for residents of Nailsea and the wider area;
 - 55 affordable homes (30%);
 - Significant public open space, including 2 children's play areas, informal paths and trails as well as landscaping;
 - Purpose built and serviced playing fields that will assist in meeting the sporting needs of the community;
- 8.5 The layout has been carefully designed to ensure that an attractive and legible place is delivered that has good access to public open space and recreational facilities. The development will provide a high quality design with finishes that will complement the architectural styles of the area.
- 8.6 The accompanying Design and Access Statement demonstrates that a distinctive character will be provided that will be largely informed by the characteristics of the site and local context.
- 8.7 There are no technical issues that would preclude the application proposal being delivered.
- 8.8 Importantly, the proposals have been developed in partnership with the town council and the Rugby Club and are intended to address the immediate needs of the wider community. The proposed development presents a valuable opportunity to assist the Council in respect of the deliverable 5 year land supply shortfall.