

Planning Policy
North Somerset Council
Walliscote Grove Road
Weston Super Mare
BS23 1UJ

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To Whom It May Concern

Regulation 19 Additional Site Consultation: Land north of Brockley Way, Claverham (HE201072).

We are writing on behalf of Latimer Developments Limited ('Latimer') which is the development arm of Clarion Housing Group, the UK's largest provider of affordable housing as part of the North Somerset Council's (NSC) additional sites consultation. This letter and the accompanying Vision Document will demonstrate the appropriateness of allocating the site North of Brockley Way, Claverham (HE201072) for housing in the emerging Local Plan 2040.

NSC is currently seeking to identify additional sites for housing following changes to the NPPF, which increased the standard method housing target for North Somerset and made it mandatory.

The government's new mandatory requirement for North Somerset is 1,593 dwellings per annum or 23,895 over the 15 year plan period. This is an additional 8,620 dwellings above the proposed housing supply target in the Councils previous Regulation 19 plan of 15,275 (July 2024). North Somerset's completions between 2006 and 2023 averaged 839 dwellings per annum, meaning that a step change in housing delivery is required to meet the local housing need stipulated by Government.

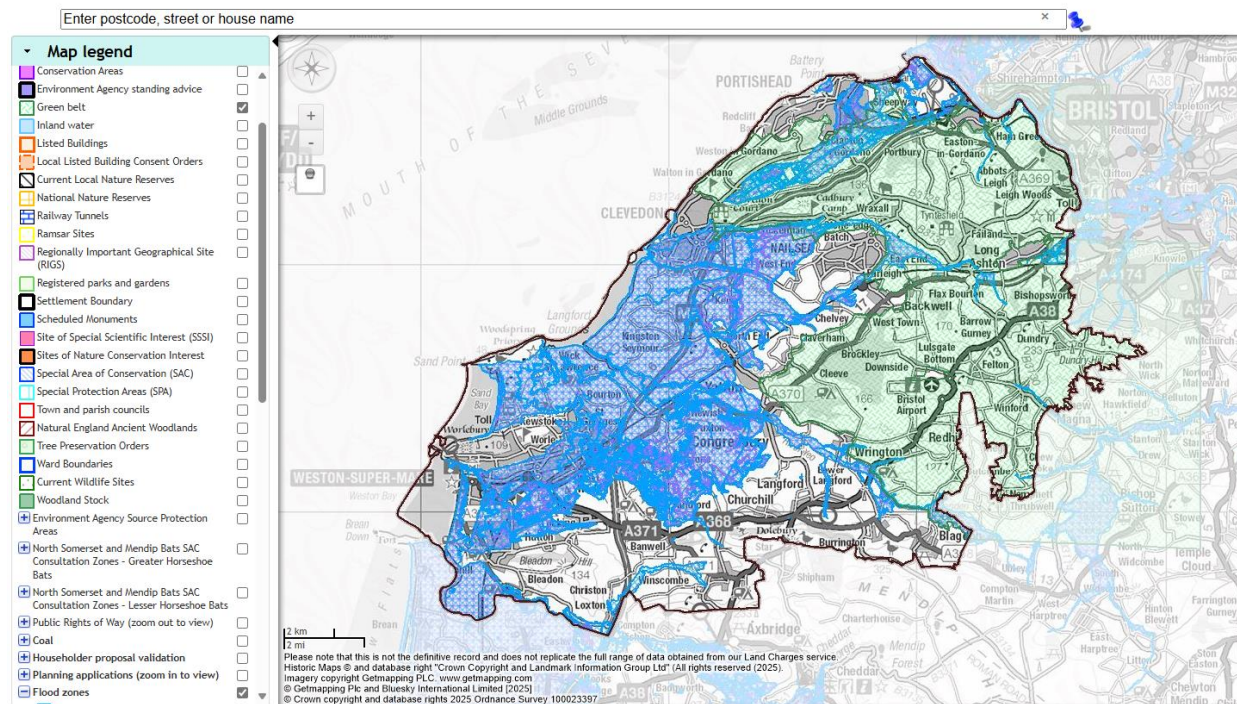
North Somerset Council must significantly increase its delivery rates to meet the new housing target and is therefore consulting on potential additional sites to be included in the emerging local plan. It is important that additional sites taken forward are of varying scales to ensure that a step change in delivery rates is achievable at an early stage. Land north of Brockley Way (HE201072) has been identified by the Council in the Consultation Paper as 'other potential' and we believe that it presents an excellent opportunity to accommodate some of the authority's additional growth on a site that is outside the green belt, free from constraints and in a sustainable location. The site is deliverable as it has a willing developer on board that is keen to progress development at the earliest opportunity.

Constraints facing North Somerset

Significant areas of North Somerset are constrained by Green Belt, flood risk, the Mendip Hills AONB as well as statutory nature conservation designations (Ramsar, SAC and SSSI). These hard

constraints limit the opportunities for identifying appropriate sites for development to meet the increased level of growth (23,895 over the 15 year period) that is required.

Figure 1 NSC Constraints Map illustrating flood zones and green belt areas within the county



Source: NSC Constraints Map.

The larger towns within North Somerset that have historically been the subject of most growth are particularly constrained and therefore cannot accommodate all the development that is now needed. This is reflected in the fact that further growth in the principal town of Western Super Mare is now proposed to be provided at land north of Banwell rather than in the town itself. The consultation paper recognises this:

“The local plan focuses growth at the most sustainable locations. Priority is accorded to the four towns although the scope for additional growth varies significantly. Weston has extensive areas at risk of flooding which means that Wolvershill on higher ground is identified as the strategic location well related to the principal settlement. Clevedon and Portishead are significantly affected by flood risk which means that additional growth is constrained. Nailsea (in addition to the adjacent village of Backwell) has more unconstrained potential, although here too there are flooding and highway constraints which would require infrastructure improvements to support growth. In addition, given the scale of new development required, and the direction set out in national planning policy, there is likely to be the need for strategic growth on the edge of Bristol.”

It is clear that the sustainable lower order settlements will need to accommodate a significant amount of growth for NSC to be able to meet the new housing requirement.

Yatton/Claverham has been identified by the consultation paper as a ‘larger more sustainable’ area in which development should be prioritised (alongside the towns). We agree with this categorisation. However, the joint settlement is highly constrained in places, with Yatton being surrounded by flood zone 3 and the south and east of Claverham being located within the Green Belt. Therefore, the only real meaningful direction for growth is to the north and north west of Claverham. In our view land north of Brockley Way (HE201072) is the only logical and deliverable site within this joint settlement to provide the necessary housing and aid NSC in meeting its mandatory housing requirement.

The site can be delivered without having any impact on hard constraints and because it is not within the green belt it should be given priority in line with the NPPF (para 147) and the search sequence within the Council’s Consultation Paper.

Sustainability of Yatton/Claverham

The Consultation Paper on additional sites for the Regulation 19 plan and the draft local plan has categorised Yatton and Claverham as a joint settlement, noting their relationship and interdependency. The Paper then identifies Yatton/Claverham as a ‘larger, most sustainable village which either contain a relatively good range of facilities, services, jobs and public transport or are well related to higher order settlements’. This is further emphasised in the Rural Settlements Paper where it is noted that “*potential for new housing development at Claverham will be assessed alongside Yatton due to their close proximity and inter-relationship*”. In our view, when the Reg 19 Plan comes forward Yatton/Claverham should be considered a higher order settlement (town) in the settlement hierarchy. The land north of Brockley Way (HE201072) has been identified as ‘other potential’ due to its sustainable location within the larger, most sustainable village of Yatton/Claverham.

The consultation paper uses the results outlined in The Rural Settlements Paper published at Preferred Options (Reg 18) stage (Spring 2022) for evaluating rural settlements to determine their sustainability and suitability for additional housing growth. Based on this villages have been categorised into four groups:

- 1 Category A villages- Villages that are relatively sustainable with a range of services that are accessible via active travel.
- 2 Category B Villages- Villages which are considered relatively sustainable due to their proximity to a category A village.
- 3 Category C Villages – Villages which have limited services and facilities and do not have good sustainable access to higher order settlements.
- 4 Category D Villages- Villages that have few or no services and facilities to sustain development and poor access to other high order settlements.

Yatton has been identified as a Category A village whilst Claverham a Category B village due its proximity to Yatton. Yatton/Claverham are identified in this paper as being an area where development will be prioritised due to it being one of the ‘larger, more sustainable villages’ with ranging facilities, services, jobs and access to public transport. Even considering Claverham as a standalone settlement it has a good range of services and facilities within walking distance of the site:

- 1 Court de Wyck (primary) School including Stepping Stones Pre school;
- 2 Claverham Village Hall and Tannery Bar;
- 3 Claverham Free Church;
- 4 Broadcroft Playing Field;
- 5 Scout Hut; and,
- 6 A Hairdresser and Hot Food Takeaway.

In addition, there are many facilities and services available in Yatton which are accessible within cycle distance or via the X5 bus, these include, but are not limited to:

- 1 Co-op convenience store;
- 2 Mendip Vale Medical Practice;
- 3 Cohens Chemist;
- 4 Pages Court Shopping Centre;
- 5 Yatton Junior Football Club;
- 6 Yatton Recreation Ground;
- 7 Claverham Cricket Club;
- 8 Various Takeaways and cafes; and,
- 9 Yatton Train Station which provides services to Weston Super mare to the west and Bristol Temple Meads to the east.

Another convenience store is located nearby in Cleeve which is within cycling distance.

Latimer Developments Limited intend to improve the facilities and services available in Claverham via the sensitive development of Land north of Brockley Way (HE201072) which will further increase the sustainability of the village through providing:

- 1 Flexible use community facility such as a community led shop or community space;
- 2 Public open space, including an equipped children's play area and recreational routes
- 3 Green infrastructure to tie in and form part of an extended local green space.
- 4 Active travel and public transport improvements

A sequential approach to identifying additional sites

NSC's Consultation Paper on additional sites for the Regulation 19 plan identifies the sequential approach used to identify additional sites as:

- 1 Sites outside of the Green Belt, but well related to the towns.
- 2 Sites outside the Green Belt, but well related to the larger villages.
- 3 Sites in the Green Belt well related to the towns, including Bristol.

- 4 Sites in the Green Belt well located to the larger villages.
- 5 Elsewhere.

The land north of Brockley Way (HE201072) falls within category 2 with Yatton/Claverham being considered a 'larger more sustainable village' located outside of the Green Belt.

Paragraph 147 of the NPPF states that local authorities '*should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development*' before making changes to Green Belt boundaries. Despite this, the Council appears to be prioritising Green Belt sites within the consultation paper ahead of sustainable sites outside the Green Belt. This contradicts the NPPF and the Council's own agreed search sequence. Large areas of Green Belt have been identified as 'most suitable' ahead of sustainable non-Green Belt sites which have been categorised as 'other potential'. This is contrary to the NPPF and should be reviewed.

The land north of Brockley Way (HE201072) therefore presents an opportunity for NSC to meet its development needs without the need to change green belt boundaries. It would seem that allocating this site would fall squarely into the NPPF wording of "*examining fully all other reasonable options for meeting its identified need for development*" as is required by the NPPF.

Progress so far

Latimer is committed to delivering a sustainable housing site on land north of Brockley Way. Alongside this response to the Regulation 19 Additional Sites Consultation, a pre-application inquiry is to be submitted imminently which will in due course lead to the submission of a planning application. This demonstrates the deliverability of the site in that the developer is willing to invest in this site to bring forward much needed homes (including a high proportion of affordable homes).

We truly believe that this unconstrained and sustainable site has good prospects in delivering affordable housing to assist in meeting North Somerset's pressing housing need.

Clarion Housing Group

Clarion Housing Group is the UK's largest provider of affordable housing, with over 125,000 homes and more than 350,000 residents across the country. Latimer is the development arm of Clarion Housing Group, developing private homes in thriving mixed use communities.

The majority of homes Clarion build remain in affordable tenure in perpetuity, but building homes for outright sale is also a crucial part of their business in order to develop both mixed sustainable communities and recycling any profits from those private sales back into building and maintaining more affordable homes.

Clarion offers a unique proposition which sets it apart from traditional volume house builders:

- 1 A long-term commitment to the people who live in the homes
- 2 Clarion communities are both socially and environmentally sustainable
- 3 A consistent commitment to high quality and net zero carbon compatible properties
- 4 Clarion does not have shareholders, so it doesn't face short-term demands to make profit at any cost

- 5 Clarion is driven by its commitment to quality, community and places that succeed
- 6 Clarion is a dependable development partner

Latimer is willing to provide at a minimum 40% affordable housing on this site. Clarion/Latimer are also keen to discuss the precise housing mix with the Council as there is an opportunity to provide a higher proportion of affordable housing than what the planning policy stipulates (potentially up to 100% affordable). This will assist the Council in addressing the significant need for affordable dwellings in the district. We note that in 2022/23 the Council had a housing waiting list of 2,458 persons. According to the 2023 Annual Monitoring report, only 404 affordable homes were delivered during this period.

The North Somerset Local Housing Needs Assessment (October 2023) that forms part of the evidence base for the emerging Local Plan 2040 notes at paragraph 18 that:

‘Overall, in North Somerset, there is a need to provide affordable housing for 4,058 households unable to afford to rent or buy over the Plan period 2024-39, which equates to 271 households per year.’

This target has only been achieved once in the past 17 years. Affordable housing delivery between 2006/7 and 2021/22 was just 58.3% of this (forward looking) level of need. This again underlines the acute need for a significant step-change in the delivery of affordable housing. It is considered that this site can assist the Council in meeting its significant affordable housing need.

Conclusion

Significant areas of North Somerset (including the major towns) are constrained by the Green Belt, Mendip Hills AONB, flood risk as well as statutory nature conservation designations (Ramsar, SAC and SSSI). However, the site north of Brockley Way, Claverham (HE201072) is not within these sensitive areas and can be developed without the need for a Green Belt review. In considering sites to meet the new housing requirement of 23,895, we believe that this site is well placed and is in full accordance with the Council’s search sequence for identifying new sites. The site is free from technical constraints and is deliverable as demonstrated by the developer’s progress towards a pre application inquiry and a planning application.

We trust that the information provided demonstrates why the land north of Brockley Way should be allocated as part of the Regulation 19 plan. We look forward to discussing the site further with you.

Yours faithfully



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Enclosures Vision Document - Land north of High Street, Claverham