

**WRINGTON PARISH COUNCIL**  
The John Locke Room, Silver Street, Wrington, BS40 5QE

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**North Somerset Council – Site Allocations Plan**

**Further Assessment of Residential Sites – Cox’s Green, Wrington**

This is a response from Wrington Parish Council to an invitation to submit comments on a list of sites identified as potentially suitable for housing development, this in relation to a reported request from the Inspector for more sites to be identified.

We have noted that 28 sites have been identified and NSC’s statement that *‘each of these sites has been assessed in terms of its suitability, availability, achievability and sustainability to contribute to additional housing supply in accordance with the Inspector’s wishes’*.

Our particular interest is in the Cox’s Green site, Wrington, which is located outside the settlement but adjacent to both the settlement boundary and the Green Belt boundary.

We have also noted NSC’s statement that *‘this list does not revisit sites which have been refused or are awaiting an appeal decision’*. There is clearly an error here as an appeal decision is awaited on the Cox’s Green site, this in relation to application 16/P/1291/O, with the hearing scheduled to commence 26 September 2017.

The point is that the Inspector is to consider the issues relating to this site at the forthcoming appeal hearing, irrespective of the fact that a decision has still to be made on a lesser number of houses, ref 17/P/0485/O. In the circumstances it would be wrong for the NSC Executive to consider this site at its 5 September 2017 meeting as the issues are largely the same, irrespective of the number of houses.

With this in mind, you are urged to remove Cox’s Green from the list to be considered by the Executive. If not there is the potential for conflict between the two Inspectors, their roles and responsibilities.

However, we have considered the statements made by NSC in its site assessment and offer the following comments on the land at Cox’s Green and its suitability:

**1. Site Details**

The industrial site to the west could not be described as ‘relatively hidden’. The ‘residential row’ referred to comprises only four (4) small houses, two of these semi-

detached and one a bungalow, and the industrial site buildings are clearly visible from the substantial majority of the proposed development site. The site access on to Havyatt Road will be almost opposite the entrance to the industrial site. The proposal to re-site some of the hedges would make the industrial site even more visible, especially from first floor windows of any new houses. Note that the site is adjacent to the Green Belt, as well as the settlement boundary, and development here would inevitably have some impact upon the openness of the Green Belt.

## **2. Site Suitability**

**Flood Risk Status** In order to reflect the true circumstances, the following should be added to the first sentence; *‘with the surrounding lanes obstructed by water in flood conditions.’* Photographic evidence is already with NSC which demonstrates this flooding.

**Archaeology** Any archaeological potential should be investigated and the reports published.

**Landscape** If built the site would be highly visible from the AONB and would impact on the green, un-developed, Wrington Vale landscape. It is suggested that the land has more than ‘moderate character’ and is arguably an essential element in the currently undeveloped landscape running alongside the river Yeo between Congresbury and Blagdon Lake (SSSI).

**Ecology/Environmental** There is recorded evidence that the undeveloped grassland and hedgerows on the site are used by bats for foraging and flight routes. Removing or re-siting the hedges and any further street lighting will be detrimental to these protected bats. It is suggested this section is re-worded as follows; *‘The Congresbury Yeo (SNCI/Wildlife Site) flows to the south of the site and a smaller watercourse flows through the site. There are hedgerows through and around the perimeter of the site and along the proposed site for a footway, all having ecological value, some of these proposed for removal or relocation. The grazing land provides a valuable foraging and flight route link for bats, in comparison with the increasingly more arable use of land to the east.’*

**Transport and highways** It is suggested this is re-worded as follows: *‘Local highways concerns have been raised about the narrow country roads, which have very limited space available for the commercial vehicle traffic associated with the industrial estates and no provision for pedestrians. A satisfactory solution would be required at the planning application stage.’*

**Site Access** Does 'Yes' mean there is access or that access will be satisfactory? Access is currently via a farm gate on a narrow country lane close to the brow of a hill and a blind bend. Please re-consider this statement.

**Site/area character** The site is remote from the village centre, but is outside the settlement boundary and adjacent to the Green Belt boundary, with agricultural land adjacent to the east and south of the site. It follows that the proposed development cannot be described as compatible with surrounding uses, and development of the site must have some impact on the openness of the Green Belt.

**Topography** There is a ridge running through the site in an east/west direction which will result in any development being highly visible from all directions. The presence of this ridge, the resulting part surface water drainage to the north, and the acknowledged high water table, would consequently result in a poorly drained and damp site. Run-off from the site already contributes to flooding on Cox's Green and Havyatt Road. NSC has been provided with photographs which illustrate this flooding.

**Planning Policy** Whilst this Council is pleased to note that the '*site is not currently or proposed to be allocated*', we would question whether the designation of a service village can now reasonably be allocated to Wroughton as many of the facilities and RAG designations referred to in this Assessment do not appear to stand up to challenge (See further comments below). We would also argue that the proposed development does not respect the character of the village and exceeds the limit of 25 houses set out in NSC's Core Strategy CS32 para 4.85.

### **3 Summary of Site Suitability**

#### **3.1 Site Availability**

We understand the site to be owned by an individual, although a developer is promoting development of the site. Proposals by the developer to install footpaths along Cox's Green northwards are confounded by claims that the land up to the highway edge is in the ownership of residents. Therefore, safe pedestrian access to and from the site is not achievable without compliance from these residents.

#### **3.2 Site achievability**

- **Viability constraints** There exist constraints as to access, sustainability and flooding (see elsewhere in these comments).
- **Competing sites** It must not be overlooked that the same developer has an outline planning application for 59 houses on this site, currently the subject of appeal (16/P/1291/O).

- **Status of development interest** We would question the ownership of this land which we understand may be owned by an individual, with others also having an interest, but not Redcliffe Homes at this time.

#### **4. Key actions to explore to overcome constraints**

##### **4.1 Flood risk**

This Council respectfully suggests that the NSC Flood Risk team might not have understood fully the nature and causes of flooding in this area of the village and have not taken into account the topography of the site, through which runs a ridge of land. This ridge must result in surface water draining to the north and to Cox's Green, whereas to the south of the ridge it drains towards the river Yeo. The river itself floods surrounding land at times of heavy rain, there is regular flooding in Cox's Green and the Burnett Industrial Estate has suffered flooding in the past. NSC is already in possession of photographic evidence of flooding events relating to the site and without major offsite works no amount of planning conditioning would satisfactorily mitigate the flood risk associated with the inadequate surface water drainage (which will be exacerbated by the development of the site), as well as the foul water and sewage removal. Substantial capital investment would appear to be necessary in order to provide increased surface water drainage capacity from Cox's Green towards the west.

##### **4.2 Local highway concerns**

It is doubtful whether safe pedestrian access to the village could be achieved as all the land which would need to be utilised, or at least as shown on the drawing submitted by the developer, is not available. It is argued that this is in the ownership of private householders and is not Highway land, with this including substantial hedges which would also need to be removed. If a footway cannot be provided then the site remains unsustainable in planning terms as a safe pedestrian access to the centre of Wroughton cannot be ensured. Also, any increase in traffic flows will add to the congestion and other difficulties already experienced in the centre of the village.

#### **5. Sustainability Assessment**

##### **i. SA Objective 1: Improve Health and wellbeing**

**Sub-Objective 1.1                      Rated Red                      -                      Accepted**

**Sub-Objective 1.2                      Rated Amber                      -                      Recommended Red**

The football pitch on the recreation field is currently only available for use by the Wroughton Redhill Football Club, not for wider community use. An assessment of Red is therefore appropriate, not Amber.

**Sub-Objective 1.3**                      **Rated Red**                      -                      **Accepted**

**Sub-Objective 1.4**                      **Rated Amber**                      -                      **Recommended Red**

This designation should now be Red. The now minimal provision of medical facilities within the village is to be withdrawn, ref Mendip Vale Medical Practice request to NHS England. Using road transport (car is the only reasonable way to reach it as there is no direct bus service), the distance from the site to the medical facilities at Pudding Pie Lane, Langford is in excess of 5km and this rating must therefore be Red.

**ii. SA Objective 2: Support communities that meet people’s needs**

**Sub-Objective 2.1**                      **Rated Amber**                      -                      **Recommended Red**

Bearing in mind the acknowledged lack of safe pedestrian access to the village centre from the site, it would seem more appropriate to designate this sub-objective as Red. (Note also the comments under ‘Site Suitability’ above.)

**Sub-Objective 2.2**                      **Rated Green**                      -                      **Recommended Amber**

The village primary school has a limited capacity and any expansion would be both costly and disruptive in terms of increased staffing requirements and increased classroom facilities. Some classes are already accommodated in ‘portakabin’ type buildings. No forecast of potential need has been provided, nor can there be any guarantee of funding for more staff or buildings, hence this assessment can’t reasonably be considered Green. This should therefore be rated as Amber.

**Sub-Objective 2.3**                      **Rated Red**                      -                      **Accepted**

**Sub-Objective 2.4**                      **Rated Green**                      -                      **Recommended Amber**

There is definitely not access to ‘a wide range of local job opportunities’ within the local settlement. Job opportunities within Wrington are very limited with most businesses employing a relatively small number of staff, many of whom commute into Wrington to work. We are not aware of any job vacancies currently advertised within the settlement. In this Council’s view, this should be rated as a minimum of Amber.

**Sub-Objective 2.5**                      **Rated Green**                      -                      **Recommended Amber/Red**

This Council maintains that it is arguable as to whether Wrington should now be classified as a service village in view of the progressive reduction in the facilities available and services provided. There are grounds for re-visiting this designation which would justify this assessment as Amber or even Red.

**iii. SA objective 4: Maintain and improve environmental quality and assets**

**Sub-Objective 4.1                      Rated Green                      -                      Accepted**

**Sub-Objective 4.2                      Rated Amber                      -                      Recommended Red**

There are acknowledged risks to the river Yeo, a designated SNCI Site, as NSC suggests drainage for the site would be diverted to the river Yeo. However, the site cannot all flow to the Yeo for reasons explained elsewhere. There will also be impacts upon bat habitat, also acknowledged by the developer. The title of this sub-objective is to 'protect and where possible enhance bio-diversity...particularly with respect to protected habitats and species'. This proposed development obviously fails to enhance anything. It should therefore be rated as Red.

**Sub-Objective 4.3                      Rated Amber                      -                      Recommended Red**

The site will of course be highly visible from the Mendip Hills AONB, particularly as it straddles an elevated ridge running through the site, and the development would also have a visual impact on the Green Belt and the existing properties on Cox's Green and Havyatt Road. There is a justifiable argument that this rating should therefore be Red.

**Sub-Objective 4.4                      Rated Red                      -                      Accepted**

**Sub-Objective 4.5                      Rated Amber                      -                      Accepted (see comment)**

Without formal classification as BMV land, this designation is not substantiated. We would urge an assessment be undertaken to clarify this, since to build on BMV land would not be acceptable unless very pressing needs were demonstrated, but which to date have not been put forward. In the meantime, an Amber rating is accepted.

**Sub-Objective 4.6                      Rated Green                      -                      Recommended Red**

Although the site is technically outside Flood Zones 2 and 3, there exist persistent flooding issues which have been the subject of correspondence between this Council and NSC. It appears to the Council that there is a fundamental misunderstanding of the causes for the flooding but it is clear that any development on the site would only serve to exacerbate the flooding issues already in place. Conditioning any development is not the solution to this problem and a full and comprehensive investigation is required to reach a sound and complete understanding of the causes of this flooding. In the circumstances, it is not justifiable to attribute a rating of Green to this objective, particularly when Sub-Objective 4.7 is rated as Red. It is noted also that there is no assessment of potential downstream impacts as there are obvious physical constraints at both Tumbling Weir and Beam Bridge where flooding has been experienced in the past and the fields from Beam Bridge

towards Congresbury and Iwood, which are also flooded in times of heavy rainfall. Any further run-off from the site must aggravate flooding potential downstream.

**Sub-Objective 4.7**                      **Rated Red**                      -                      **Accepted**

**Sub-Objective 4.8**                      **Rated Green**                      -                      **Recommended Amber**

Local residents frequently experience congestion and delays along Havyatt Road and Cox's Green due to vehicles accessing the industrial estates as well as incoming and outgoing commuters using this lane to reach the A38. Nates Lane is very narrow and unsuitable for this purpose. It is inevitable that cars will be the preferred means of accessing the site. The bus service is generally unsuitable to meet commuters' needs and cycling is not to be recommended along the narrow access lanes in and out of the village. It follows therefore that any development on this site would add to highways issues already exacerbated by recent developments within the village, notably shop and office conversions to residential use. This objective should be rated as Amber.

#### **iv. Objective 5: Minimise consumption of natural resources**

**Sub-Objective 5.1**                      **Rated Green**                      -                      **Recommended Amber/Red**

Bus services in Wrington do not connect with any of the neighbouring settlements of Clevedon, Nailsea and Portishead and certainly not within a 30 minute timescale. Travelling time to Weston-super-Mare by car normally takes in excess of 30 minutes and by bus up to 45 minutes. There is no bus service to Congresbury or Yatton. The only bus service through Wrington is the A2 service which has a limited timetable with no buses on Sundays or Bank Holidays and with the overall frequency inadequate. Crucially, funding for the A2 has recently been withdrawn by First as the service is not considered to be viable. The existing service cannot be regarded as running consistently on an hourly basis and the rating for this objective should therefore be a minimum of Amber and arguably Red.

**Sub-Objective 5.2**                      **Rated Green**                      -                      **Recommended Amber**

Although a bus stop may be close to the site, please note the comments set out above under Sub-Objective 5.1.

**Sub-Objective 5.3**                      **Rated Amber**                      -                      **Recommend Red**

There are currently no footways enabling safe access to the village centre from the site, and although the developer has proposed a scheme to achieve this, the viability of that scheme/proposal is very much in doubt (see comments under 'Site Availability' above.). It is not easy to understand how

cycle links could be improved either, with the narrow access lanes to Wrington being one constraining factor. An appropriate classification for this sub-objective must therefore be Red.

**Sub-Objective 5.4                      Rated Red                      -                      Accepted**

**Sub-Objective 5.5                      Rated Amber                      -                      Accepted**  
(as a reflection of the Core Strategy and Planning Policy)

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For further information please contact:

Wrington Parish Council  
The John Locke Room  
Silver Street  
Wrington BS40 5QE

tel: 01934 863984  
email: clerk\_wrington@hotmail.com

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