

Response to Consultation on Draft North Somerset Local Plan

April 2022

We write with our comments and recommendations on the draft Local Plan which was issued for Consultation in March 2022.

As a conservation group initially formed in Weston to help protect the Birnbeck conservation sub-area from unsympathetic development damaging to the social and economic prospects of the town, we have limited our detailed examination of the draft Plan to those areas most closely associated with our objectives.

We maintain an unshakeable belief that conserving and enhancing conservation areas delivers economic, social and environmental benefits far beyond the effort and resources required to protect them, and we have made several recommendations below which speak directly to these benefits in rendering North Somerset a place where people want to come to live, work, play and visit.

As such we have found much to commend in the draft Plan, and whilst not diminishing other important aspects of sustainability that are detailed, we would refer in particular to the policy provisions to be found in:

Sustainable Development, Objectives 3.4 to 3.6;

SP4 (Placemaking);

SP11 (Green infrastructure and historic environment);

DP1 (High Quality Design);

DP38 (Built Heritage);

DP40 (Historic Parks and Gardens).

We also note with approval that Schedule 1 of the draft Plan ('Proposed Large Sites for Residential Development') puts forward no allocation with respect to the former Royal Pier Hotel site at 55-57 Birnbeck Road, Weston-super-Mare.

We consider this is wholly right and proper for several reasons: First because there is no significant allocation to be carried forward from the Site Allocations Plan¹, second because there is as yet no settled view as to the number of dwellings that might be sustainably accommodated on this site (assuming residential housing remains a feature of development plans), and a current planning application for this site is undetermined and we understand likely to be revised by the applicant.

¹ The 2018 Site Allocations Plan referred to 63 dwellings collectively on the Dorville Hotel, Lynton House Hotel and Royal Pier Hotel sites. Dorville is allocated 20 of those dwellings and Lynton is scheduled in the draft Local Plan to be 40 (reduced from 48) (i.e. 20 + 40 = 60), which means the former allocation has already been all but satisfied.

Against that background we wish to put forward the following recommendations to further strengthen and improve the Plan's ability to deliver sustainability over the next fifteen years:

	Reference	Recommendation	Reason
A.	Sustainable Development Objective 1.4, page 8:- "Promote development which requires a deliverable level of high quality and sustainable infrastructure."	For "requires", substitute "incorporates" or "makes provision for"	There seems to be ambiguity here. "Requires" suggests that the Council or others may be left to furnish the infrastructure the development calls for. Developments which are to be promoted should surely be making their own provision for such infrastructure?
B.	Section DP38 (Built Heritage), page 84, third bullet	<p>Insert the following additions (shown here in bold type):-</p> <ul style="list-style-type: none"> ● <i>New development affecting the setting of a Conservation Area or listed building preserves those elements of the setting that make a positive contribution, respects the existing elevations and contours of the setting and, where possible without transgressing the other requirements of this Policy, better reveals the significance of the conservation area or listed building;</i> <p>In the 'Justification' section on page 85, insert the following new paragraph:</p> <p><i>Permission will not be granted for new development in Conservation Areas where it would exceed the elevation (measuring from ground level):</i></p> <ul style="list-style-type: none"> ● <i>of any pre-1901 building that may have previously occupied the development site within the past twenty-five years;</i> ● <i>or otherwise, of the highest pre-1901 building within a half kilometre radius.</i> 	<p>As elsewhere in the UK, a central characteristic of Conservation Areas (CAs) in North Somerset is a broad consistency within each area in the elevation of the historical buildings constructed mainly in the Georgian Regency and Victorian eras which predominate in these areas (as well as a discordance caused by past development which is unsympathetic to these historical contours).</p> <p>The unifying effect of such consistency in the built environment is clearly edifying to a major part of the population, as evidenced by annual surveys which consistently list towns and cities such as Bath, Oxford, York, St Albans, Dorchester, Arundel, Bakewell as amongst the best places in the country to live or to visit.</p> <p>We also contend the heritage enshrined in CAs and supported by their architecture, acts as a powerful magnet not only for tourism but in encouraging service businesses to set up or expand in the surrounding areas where they and their staff can enjoy the perceived quality of life which tends to be associated with places with a concentration of CAs.</p> <p>These suggested additions to DP38 are to provide a clear and objective policy in Conservation Areas that these historical contours are to be respected and moreover are central</p>

			<p>to the planning law and regulation protecting CAs.</p> <p>The provision concerning pre-existing heritage buildings both conforms to these legal and policy requirements whilst in addition reflecting a further policy in CAs of like for like replacement for demolished heritage buildings (e.g. where fire damaged).</p>
C.	Section DP38 (Built Heritage), page 85	<p>In the 'Justification' section, insert the following new paragraph:</p> <p><i>There will be a prima facie presumption that new development will harm the existing character and appearance of a Conservation Area where the proposed design is out of keeping with the predominant architectural style within a half kilometre radius, unless an alternative design can be credibly demonstrated to be of the most exceptional aesthetic quality.</i></p>	Please see B above.
D.	Section DP38 (Built Heritage), page 85	<p>Insert the following addition (shown here in bold type):-</p> <p><i>Permission for the demolition or redevelopment of a building of individual merit or group value will be exceptional. The implementation of any consent for demolition will only be granted where there is clear and convincing evidence that all reasonable efforts have been made to retain existing uses or introduce new viable uses and following a wholly independent survey (funded by the applicant) which confirms the same and the letting of a contract for approved redevelopment. Proposals for demolition, or for significant undergrounding of services, must also comply with Policy.</i></p>	To provide an independent view that existing or new uses have been properly explored, including any attendant internal conversion of the building that might be required to facilitate new uses.

E.	Schedule 1 (Proposed large sites for Residential Development), page 116 (Weston)	Madeira Cove Hotel We would like reassurance that the allocation of 10 has been calculated to allow for the possibility that the building is converted, as opposed to demolition and redevelopment under the extant planning permission.	We believe there is a real prospect that this structurally sound Italianate style villa, one of a group, may be saved by conversion, in line with the principles and policies in the local plan; It would contradict the conservation policies in the draft Plan if this possibility were not factored in when determining the numerical allocation.
F.	Schedule 1 (Proposed large sites for Residential Development), page 114 (Weston)	Dolphin Square We would request that this carried-over allocation of 80 be reappraised in the light of an innovative proposal we have seen put forward which would install converted shipping containers to create a retail and hospitality hub close to the seafront.	Such a concept has proved highly successful at Wapping Wharf in Bristol, and would be capable if well executed of broadening Weston's appeal by offering a new and alternative form of retail experience for residents and visitors alike, with e.g. engaging gift and fashion outlets, fusion eateries, delicatessen etc. It could even grow as an extension of established events such as the Weston Food Festival and UpFest.
G.	Schedule 2 (Proposed Employment Sites), page 132 (Weston)	Inclusion of an entry for Dolphin Square	Please see F above.

We hope these recommendations will be given due consideration.

Birnbeck Conservation Group