

## North Somerset Council Core Strategy Consequential Changes Examination

Further representation by Matthew Macan 18/05/16

Dear Sir

Representations, amounting to objections, have been submitted in respect of the Council's proposed changes to the remitted policies. The Inspector has highlighted the issues that he considers material to the test of soundness and the Council have responded to these points in their letter of 14th March 2016.

This further response addresses the continued failure of the Council to provide any evidence of the success or otherwise, of their employment led strategy, and Policy CS20 for WsM. Our earlier representations explain why this is so significant and why in determining the soundness of the Council's proposed changes to the remitted policies, the question of whether the proposed redistribution of housing is "effective" and/or "justified" have not been addressed by the Council.

The underlying assumption of the Council in its proposed changes and more fundamentally, within the addendum to the SEA and the SEA itself, is that the increase in employment required by policy CS20, will be delivered alongside the new and additional housing at WsM and at Weston Villages. There is no evidence to suggest that this is happening and will happen, in the remaining 10 years of the Plan.

The Council's response in para 36 – 40 of their letter is examined:

Para 36. The comments from the previous Inspector considering new policy CS13 are nothing to do with the jobs led strategy at WsM but to do with the delivery of sufficient housing to address both planned job increases across NS as a whole and the proposed demographic changes of existing working residents retiring over the Plan period and remaining in NS. Spatial distribution, or meeting the jobs led strategy for WsM was not examined.

Para 37. The Council appears to be developing a "pragmatic and flexible" approach to the jobs led policy CS 20, including receiving financial contributions in lieu of delivery of jobs. This is a move away from the Council's own strategy and policy in a way that undermines the employment led target. No assessment of this so-called "sophisticated approach" has been undertaken in order to understand the impact of not providing 1.5 jobs per home. In practice the Inspector should consider the soundness of the proposed policies based upon compatibility with Council's objectives in the Core Strategy, existing adopted policy CS20 and evidence of delivery of the actual jobs ie will the target be achieved?

Para 38 Delivery of even more jobs per home over the next 10 years is a consequence of the current under provision of jobs against actual homes ie not meeting the current target as well as the back loading of the jobs v homes ratio ( only 0.9 jobs per home to 2016 ). This means delivery of 1.5 jobs per home from 2016 until 2021, and over 2 jobs per home 2021-2026 will need to

be delivered both on existing housing numbers, as well as the additional housing in WsM and Weston Villages.

How will this be delivered and what is the likelihood of achieving these targets? No evidence is provided of what the current jobs provision has achieved to 2016, despite the need to review the performance, as set out in the Plan.

The Inspector needs evidence on the net jobs delivery to date at WsM, to consider whether the proposed changes to remitted policies are capable of being sound. Equally the assessment of delivering increased jobs verses homes in the next 10 years, needs to be set out.

Para 39 Just because WsM is now a TTWA fails to demonstrate that it is achieving its jobs led strategy.

To conclude, in the absence of addressing this issue and the Inspector having evidence before him that additional jobs are being delivered and will be delivered, to achieve the Council's adopted strategy and extant policy CS20, the proposed distribution of housing to WsM cannot be found sound.

The Council have failed to consider alternatives or consider the consequences of not meeting the policy. In practice, the latter is not open to them as this would require reopening the whole Core Strategy and the policies relating to WsM, including CS20 and others. This is not before the Inspector and cannot be solved through making recommendations.