

North Somerset Core Strategy Consequential Changes Examination

Inspector's questions for the examination

Before setting out the questions, there are a number of important matters of clarification.

1. I do not want to spend time on the sustainability appraisal, previously identified as Matter 1. Having regard to the fact that SA and supplementary reports have been previously produced it seems to me that the Council has taken a proportionate approach to the remitted policies in this respect. The essence of the spatial strategy encapsulated in the remitted policies appears to be sound and we are well into the plan period. That is not to say that adjustments cannot be made to the policies but if there are any points on the SA they can be addressed in the context of the questions below.

2. I am aware of the work on a new SHMA, OAN and the JSP, but this examination relates to the remitted policies of the existing Core Strategy with a requirement of a minimum of 20,985 dwellings.

3. I want to give the most attention to whether the remitted policies have the ability to deliver the housing requirement. I am concerned that the calculation of the residual requirement appears to assume 100% delivery on all sites, when there is evidence that some do not come forward. I am also concerned that the plan may not provide enough flexibility to give confidence that the requirement is deliverable. It will be useful to assess the extent of any shortfall in order to establish whether there are implications for the remitted policies. Any alternative figure will need to be realistic and workable. I will also want to talk about alternative policy wording in the event that additional flexibility or capacity are required, and the implications of any wording changes for the overall strategy.

4. The 5 year housing land supply position is relevant insofar as I need to know whether the remitted policies are capable of allowing for the early delivery of sites sufficient to ensure an ongoing 5 year supply. I would like constructive input on this and do not want to replicate a detailed s78 type discussion on the subject. While on this subject, there is no real evidence of persistent under-supply over the *whole* of the economic cycle and the Council have had to deal with changing housing requirements so it seems to me that the buffer should be 5%. The Council seem to have held varying views on methodologies and their comments would be useful.

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5. On the matter of strategic gaps, previously identified as Matter 5b, Policy CS19 in itself appears sound and does not seem to me to represent an impediment to housing delivery. The explanatory text to Policy CS19 indicates that strategic gaps are to be defined in the Sites and Policies Development Plan Document, so representations about the location and boundaries of the strategic gaps should be made in the context of that plan. I do not therefore to include the matter in the questions below.

6. I intend to deal with issues regarding the potential tension between housing delivery and employment delivery (previously identified as Matter 6) within the discussion on Weston-super-Mare and Weston Villages and, where it has arisen, within the context of the other villages.

7. This being a Core Strategy, and therefore strategic, I will not be discussing in detail the respective merits of different potential development sites or the sustainability scores of different settlements.

Questions

MATTER 2 – HOUSING CALCULATION

Q1. Permissions. See housing calculation table at paragraph 16 of CC/07 and at CC-CS/2. In April 2015 there were 6,558 units with permission or a resolution to grant (is there a current figure?). Should a reduction be applied to allow for a percentage of sites that do not come forward? 9% or 10% have been suggested in some representations. Is there a sound evidence base for this?

Q2. Allocations. 372 units remain from sites allocated in the Replacement Local Plan 2007. If they have not come forward by now, does that suggest that there are significant impediments to development? Should 372 units be deducted from the calculation?

Q3. Development lead-in times and the impact of the employment-led approach for Weston Villages, and the complications associated with regeneration schemes in Weston-super-Mare: should an allowance be made for housing slippage beyond the plan period? (In this question I want to touch on general numbers only, returning to the subject in more detail in Q7 and Q8.)

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Q4. 5 Year housing land supply. Do the remitted policies (in respect of the housing numbers) contain enough flexibility to allow developable sites to be brought forward early?

Q5. Policy CS13 requires a supply of deliverable and developable land to secure the delivery of a *minimum* of 20,985 dwellings. How should the potential risks and impediments to the delivery of permitted schemes and allocations discussed in Q1 to Q4 be taken into account? Is there any flexibility built in?

MATTER 3 - POLICIES

Q6. Weston-super-Mare. Are the CS14 / CS28 assumptions regarding delivery by 2026 too ambitious, even allowing for the fact that the HCA are involved in town centre regeneration? Should the housing requirement be reduced and partially re-distributed? What would the consequences be for the overall strategy? What might the policy wording look like?

Q7. Weston Villages: CS14 / CS30. What is the likelihood of Weston Villages delivering 6,500 dwellings over the plan period given the infrastructure requirements and the employment-led approach?

Q8. Clevedon, Nailsea and Portishead – focus on Nailsea. Should the CS14 / CS31 housing figure be increased to allow further developable sites to come forward and provide additional flexibility? What are the constraints to further development? What might the policy wording look like? Is it necessary to have much detail in the policy wording about what form of development will be acceptable given that there is a forthcoming Sites and Policies DPD?

Q9. Service Villages. Should the CS14 / CS32 housing figure be increased to help meet the overall requirement and/or to allow for additional plan flexibility? What are the advantages and disadvantages in terms of the overall strategy? What might the policy wording look like? Is it necessary to have much detail in the policy wording given that there is a forthcoming Sites and Policies DPD?

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Q10. Infill villages, smaller settlements and countryside. Should the CS14 / CS33 housing figure be increased to help meet the overall requirement and/or to allow for additional plan flexibility?

What are the advantages and disadvantages in terms of the overall strategy?

What might the policy wording look like?

Is it necessary to have much detail in the policy wording given that there is a forthcoming Sites and Policies DPD?

Q11. Green Belt, CS6. Would the need to provide for the housing requirement justify a review of Green Belt land?

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