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Dear Madam

**Examination into the soundness of the North Somerset Site Allocations Plan (SAP)**

Thank you for your letter dated 6<sup>th</sup> March 2017. The Council's response to the various issues you raise area as follows:

***Scope and purpose of the Site Allocations Plan (SAP)***

*Noted and agreed*

***The basis for the housing requirement in the SAP***

*Noted and agreed*

***Allocated and omission sites***

*Noted*

***Delivery of Housing***

Table 1 of the SAP sets out the categories of supply (along with completions to April 2016) that have been identified to deliver the housing requirement as a whole over the plan period.

Within submission document SD20 there is an updated version of Table 1, which incorporates the additional sites that the Council propose to allocate and changes proposed, as per the Executive Committee's resolution.

As requested, as appendix A to this letter, we have produced an itemised delivery trajectory, based on the schedule (Schedule 1) to policy SA1. For ease of reference, the

sites are listed in the same order as the schedule within the plan. For completeness, appendix A also includes the anticipated delivery trajectory of those sites that are considered deliverable by the council but that are not proposed to be allocated, and the other categories of supply that comprise the overall land supply provision.

This trajectory sets out the planning status of each site, capacity, any past completions that have been recorded, and the expected rate of development each year to the end of the plan period. The final column for each record lists its page number in Appendix B.

Appendix B provides the supporting information and delivery assumptions for each site. The primary purpose of this document previously has been to underpin the council's five year land supply position at S78 inquiries. It has been updated to include all of the necessary evidence to support the Sites Allocations Plan. As a general principle, it is not standard practice within North Somerset to apply standard lead in times and build rates. Delivery forecasts for each site are made on a case by case basis, in conjunction with the landowners and developers wherever possible, as per National Planning Practice Guidance advice.

This evidence demonstrates how the Site Allocations Plan makes an appropriate contribution to maintaining a five year land supply throughout the plan period. In addition to the specific deliverable sites listed and other categories of supply, further reassurance that the supply position can be maintained, or that any future deficit can be readily addressed, is offered through the provisions of the North Somerset Core Strategy.

Policies CS28, CS31 and CS32 support the release of sustainable sites of a scale appropriate to the settlement they relate to, subject to certain criteria, through the development management process, to complement those sites proposed to be allocated in the Site Allocations Plan.

Core Strategy Policy CS28: Weston-super-Mare allows for sites of up to about 75 units to come forward adjacent to the settlement boundary if they meet all of the specified criteria. Policy CS31: Clevedon, Nailsea and Portishead makes provision for suitable sites of up to 50 units to be released outside of the plan-making process, and Policy CS32: Service Villages now allows for developments of up to about 25 units to come forward adjacent to the nine settlements within this category.

At the present time, as specific deliverable sites are yet to be identified and because a trend based forecast would not be appropriate (as the policies are more flexible than ever before), we have not included a specific quantum of supply expected from this source. What it does provide, however, is reassurance that sustainable sites can be released quickly, through the development management process.

Inspector Bore, who re-examined the Core Strategy remitted policies, considered the framework for how the five year land supply should be calculated. The council's submissions to him are attached to this letter as Appendix C. You will be aware that he concluded that the appropriate methodology is Sedgefield and that a 5% buffer should be brought forward from later in the plan period to ensure choice and competition in the market. The council agree. Two S78 Inspectors have recently concluded that a 20% buffer should be incorporated into the five year supply calculation, however the Council remain of the opinion that Inspector Bore's conclusions in respect of the buffer should be preferred,

given that they were made following the Core Strategy examination, a non-partisan setting, and the most appropriate to determine this as per the guidance.

The Council would be happy to include a trajectory in the Site Allocations Plan, demonstrating how residential development is expected to be delivered in accordance with the plan period housing requirement. At present, the latest available information is set out in full in Appendix A to this letter. A suggested extract for inclusion within the plan, by area and year is presented below however, updated information will be available by the time of the hearings, and as such we would suggest including the April 2017 position once available.

	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26
Weston-super-Mare	363	543	1003	1262	1330	990	920	850	770	699
Clevedon	31	24	27	57	57	0	10	15	0	0
Nailsea	45	90	150	123	145	75	75	75	75	0
Portishead	61	89	167	45	13	0	0	0	0	0
Service Villages	40	134	355	401	285	100	0	0	0	0
Infill villages	0	0	46	63	50	20	0	0	0	0
Other settlements and countryside	46	144	0	16	16	0	0	0	0	0
Other sources of supply (district wide)	195	195	195	196	196	195	195	195	196	196
<b>TOTAL DELIVERY</b>	<b>781</b>	<b>1219</b>	<b>1943</b>	<b>2163</b>	<b>2092</b>	<b>1380</b>	<b>1200</b>	<b>1135</b>	<b>1041</b>	<b>895</b>

## ***Delivery of Employment***

### *Background*

Core Strategy Policy CS20 sets out the higher level policy to guide the anticipated scale and distribution of employment across North Somerset up to 2026. This provides for a minimum of 10,100 jobs between 2006 and 2026, covering the range of employment types including B Class employment. It also assumes previously allocated sites from the Replacement Local Plan (2007) would be rolled forward as new land allocations for employment subject to review<sup>1</sup>.

Some 10+ years into the plan period a large proportion of these overall jobs will have been delivered leaving a residual number to be accommodated during the remainder of the plan period up to 2026. Many of these will be delivered as a result of general economic growth delivering employment across the services (non B Class) sector, and a slightly larger share is anticipated to be delivered across the B Class uses, facilitated through land allocations in the SAP. B Class employment is estimated to account for around 57 - 60% of total jobs growth<sup>2</sup>. This response focusses on B Class employment growth.

### *Role of the SAP*

The SAP provides a series of land allocations to facilitate the delivery of B Class employment. These are reproduced in Table 2 of this letter. These are broadly located according to the overarching spatial strategy of the Core Strategy e.g. with a focus of growth at Weston-super-Mare (WSM), followed by the other three towns and smaller villages. Alongside these allocations, wider actions and policy intervention is required to facilitate delivery of these sites including for example infrastructure investment at WSM, and enhanced marketing and promotion to support delivery of economic growth. The Council have made significant investment in promoting economic growth in North Somerset to support delivery.

### *Historic rate of B Class completions*

Table 1 provides the rate of B Class employment completions across North Somerset for the first half of the plan period (2006 to 2016).

<b>Table 1: Historic B Class employment completions</b>		
	<b>Sqm</b>	<b>Ha</b>
2006	21,350	7.19
2007	13,495	7.14
2008	36,807	11.03
2009	6,534	3.92
2010	10,311	5.26
2011	20,154	12.11
2012	6,719	10.7

<sup>1</sup> This review has taken place through Submission Document SD11.

<sup>2</sup> Based upon West of England Partnership (March 2016) *West of England Economic Development Needs Assessment*, medium-high and high growth scenario.

2013	3,200	1.97
2014	15,749	4.88
2015	3,371	1.72
2016	24,146	10.6
<b>Total</b>	<b>161,836</b>	<b>76.52</b>

This shows an annual average of just over 7.6 hectares of B Class employment delivered despite challenging economic circumstances experienced through a large part of the period.

*Future delivery of allocated sites*

Simply projecting forward the annualised completions figure calculates to an estimated delivery of around 76ha across the remaining part of the SAP period to 2026. It is expected that the marginally increased amount of land allocated (85.5ha) will be taken up reflecting improved economic conditions and increased momentum in the employment land market, particularly at WSM.

Table 2 below sets out the range of sites allocated for B Class employment use and provides a commentary on the potential delivery.

<b>Table 2: Proposed Employment Sites</b>		
<b>Schedule 2 - Site location</b>	<b>Hectares allocated for B use classes</b>	<b>Commentary</b>
<b>WESTON-SUPER-MARE</b>		
Weston Villages – other employment sites set out in Weston Villages SPD and sites with planning permission.	17.6	Expected to be delivered over the plan period in line with housing at Weston Villages guided by employment-led approach. Development will be guided by a masterplan.
Haywood Village Business Quarter	24.0	Expected to be delivered over the plan period in line with housing at Weston Villages guided by employment-led approach. Development will be guided by a masterplan.
West Wick Business Park – Land adjacent to west of M5	4.7	Expected short to medium term.
Europark	13.6	Site potentially linked to release of residential development at Weston Villages as part of the employment-led strategy. Site

<b>Table 2: Proposed Employment Sites</b>		
<b>Schedule 2 - Site location</b>	<b>Hectares allocated for B use classes</b>	<b>Commentary</b>
		is an existing business location offering opportunity for redevelopment.
Weston Gateway, South of A370	1.2	This site has planning permission for B1a so could come forward in the short term.
Summer Lane, North of A370	3.6	Delivery estimated short to medium term. Extensive employment development has already taken place including a large headquarters block. There is a masterplan in place to guide development.
Land at Aisecombe Way	0.5	No specific timescale to deliver however no specific constraints known that would hamper delivery.
Moor Park, A371	5.3	Potential for site to come forward in the short to medium term. Potential need to provide transport mitigations subject to transport assessment.
<b>TOTAL FOR WESTON-SUPER-MARE</b>	<b>70.5</b>	
<b>CLEVEDON</b>		
Land to the west of Kenn Road	8.2	Large site adjacent to Clevedon 5/20 business park. Green field site with no known insurmountable constraints. Landowner has made representations to the SAP for residential development.
Clevedon 5/20 Kenn Road Business Park / Yeo Bank	2.1	Large majority of site already built-out. No insurmountable constraints known that would prevent the remaining sites delivery within the plan period.
<b>TOTAL FOR CLEVEDON</b>	<b>10.3</b>	

<b>Table 2: Proposed Employment Sites</b>		
<b>Schedule 2 - Site location</b>	<b>Hectares allocated for B use classes</b>	<b>Commentary</b>
<b>NAILSEA</b>		
Land at North West Nailsea	1.5	Site expected to be brought forward as part of mixed use site. Residential component due to commence in 2019.
<b>TOTAL FOR NAILSEA</b>	<b>1.5</b>	
<b>PORTISHEAD</b>		
Gordano Gate	1.6	Residual parts of allocation. No specific timescale to deliver however no specific constraints known that would hamper delivery within the plan period.
<b>TOTAL FOR PORTISHEAD</b>	<b>1.6</b>	
<b>SERVICE VILLAGES</b>		
Elliott Medway, Congresbury	0.3	No specific timescale to deliver however no specific constraints known that would hamper delivery.
Estune Business Park, former Long Ashton Research Station, Long Ashton	0.38	Previous application for residential refused on basis of loss of business land.
Burnett Industrial Estate and Havyatt Business Park, Wrington	0.51	No specific timescale to deliver however no specific constraints known that would hamper delivery.
Park Farm, Yatton	0.42	No specific timescale to deliver however no specific constraints known that would hamper delivery.
<b>TOTAL FOR SERVICE VILLAGES</b>	<b>1.61</b>	
<b>TOTAL EMPLOYMENT ALLOCATION</b>	<b>85.51</b>	

## *Summary*

The supply of land employment proposed in the SAP is only marginally higher than has been completed in the first half of the plan period indicating the scale of employment land on offer to be appropriate particularly given the improved economic prospects now compared to the earlier parts of the plan period.

The majority of this supply is located at WSM to be delivered as part of the employment-led strategy and supported by the identification of the Junction 21 Enterprise Area. Previous submissions were presented to the Core Strategy hearing sessions related to the Council's aspirations for economic growth, the measures in progress to promote growth, and the activity that has taken place in recent years and can be provided if required.

The delivery of employment land at WSM, particularly the Weston Villages, is expected to be very much related to the overall build-out of the development in the town guided by the specific delivery obligations upon housing developments linked to the employment-led strategy. It would be expected therefore that a gradual build-out of the WSM sites will take place over the plan period. Sites elsewhere provide local opportunities for business growth across the plan period, many of which don't have a specific delivery timescale but could be brought forward within the plan period. This approach is considered compatible with NPPF paragraph 22.

## ***Habitats Regulations Assessment (HRA)***

The guidance focuses on the North Somerset and Mendip Bats SAC which includes areas within the boundaries of Somerset County Council e.g. the Cheddar Complex SSSI and the hibernation roosts at Wookey Hole SSSI. The lead authority in the preparation of the guidance is Somerset County Council. There has been some recent progress regarding the guidance.

The Somerset County Council ecologist who has been working on the guidance made some changes to the text, and in addition incorporated an amended flow chart within it, (as requested by officers of North Somerset Council), mainly making it diagrammatic. This revised version was sent to Natural England earlier this month (March 2017), who made a number of changes

On 17 March 2017 the "final draft" version resulting from the above process was sent to stakeholders who have been involved, (including officers of North Somerset Council). It was made clear that the guidance has been recently reviewed by Natural England and showed the recent changes and additions and invited any further comments by March 31<sup>st</sup>. The anticipated programme is to finalise the guidance by mid- April and that finalisation will mean final sign-off by Natural England.

## ***Flood Risk Assessment***

Your letter (ID/1) notes that some of the sites allocated for development in the SAP are indicated as being subject to risk of tidal/fluviial or surface water flooding and asks the following questions:

*Has any flood risk assessment been undertaken for the Plan as a whole?*

There is an extant Strategic Flood Risk Assessment (SFRA) for North Somerset (excluding the island of Steep Holm)<sup>3</sup>. The Level 1 SFRA report was completed in 2008, the mapping for it being delivered in 2009. Level 2 reports were produced as follows:

Area 1: coastal strip from south of Clevedon to Ham Green (2009)

Area 2: urban extension area south-west of Bristol (2009)

Area 3: land around Nailsea and Backwell (2009)

Area 4: land around Yatton/Congresbury (2009)

Area 5: land around Banwell/Winscombe/Churchill/Wrington (2009)

Weston-super-Mare (2010)

GIS layers derived from the Level 1 SFRA include those showing the split of Flood Zone 3 into 3a and 3b. The council keeps these updated to reflect changes to Flood Zone 3 published by the Environment Agency (EA) as part of the national Flood Map for Planning (Rivers and Sea). Additionally, there is frequent liaison with the EA and the Internal Drainage Boards so that planners are aware of emerging issues, including new modelling that could result in a need to update SFRA data.

The council also has access to the latest EA information on areas at risk of surface water flooding. Surface water flood risk tends to be very localised and in most areas can be accommodated in designing a site layout, for example in locating sustainable drainage systems.

As a Lead Local Flood Authority, North Somerset Council has prepared a Local Flood Risk Management Strategy (LFRMS) which outlines how local flood risk is intended to be managed. The LFRMS identifies villages that are vulnerable to the risk of flooding from ordinary watercourse and surface water flooding problems where new development will need to consider flood prevention measures to reduce risk. Local flood risk means flooding from surface runoff, groundwater and ordinary watercourses.

No specific FRA document has been produced to accompany the Plan. Instead, information from the SFRA has been used in producing the Sustainability Appraisal (SD6-SD8). See Table 1 Sustainability Appraisal Framework Objectives 4.7 and 4.8 (SD7) This relates the information to the proposed allocations in a proportionate way.

*Can the Council confirm that the Environment Agency is satisfied that the Plan would not contribute to any unacceptable increase in flood risk?*

The Environment Agency has made 13 comments on the Publication Version of the Plan<sup>4</sup>. These identify concerns to be taken into account in developing allocated sites but do not suggest that these sites are unacceptable in flood risk terms.

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<sup>3</sup> [www.n-somerset.gov.uk/sfra](http://www.n-somerset.gov.uk/sfra)

<sup>4</sup> [http://consult-ldf.n-](http://consult-ldf.n-somerset.gov.uk/consult.ti/SAPPV/listRepresentations?objectoruid=1020673&findbutton=Y)

[somerset.gov.uk/consult.ti/SAPPV/listRepresentations?objectoruid=1020673&findbutton=Y](http://consult-ldf.n-somerset.gov.uk/consult.ti/SAPPV/listRepresentations?objectoruid=1020673&findbutton=Y)

## ***Hearings***

Noted . We await a detailed programme for the hearings

This letter has been placed on the examination library with a CD/1 reference and we look forward to responding to any further issues you may have

Yours faithfully

Graham Quick

Local Plan Team Leader

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