

North Somerset Core Strategy Examination

North Somerset Council
Position Statement: Issue 1c

HD/03

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Issue 1c
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Potential additional contingency housing land supply

1. The Core Strategy proposes a housing requirement of a minimum of 14,000 dwellings over the plan period. This is a deliverable quantum of housing which will meet needs over the plan period consistent with the existing spatial strategy and the key objectives of the Core Strategy. Housing delivery will be monitored throughout the plan period and land supply adjusted as necessary. This paper explores the options available and the implications should additional housing land supply need to be identified.
2. Opportunities can be grouped as either:
 - i) In conformity with the Core Strategy spatial strategy – sources of supply identified through Strategic Housing Land Availability Assessment (SHLAA) and other opportunities such as by increasing density.
 - ii) Inconsistent with the Core Strategy spatial strategy – such as strategic scale development at towns and villages, dispersed development, development within the Green Belt.

The Council's position is that sufficient opportunities for contingency land supply are to be found in i) which would permit significant flexibility in future provision. If these are found to be insufficient, then substantial amendments to the Core Strategy approach may be required.

Potential additional sources of supply:

i) Opportunities in conformity with the Core Strategy spatial strategy

SHLAA

3. The Strategic Housing Land Availability Assessment (ED/09) sets out the sources of supply to meet the Core Strategy requirement of a minimum of 14,000 dwellings. Figure 1 summarises the SHLAA position (adjusted to take account of the increase from 13,400 to 14,000 dwellings). The SHLAA demonstrates that there is flexibility in the Core Strategy position as there is a potential supply of 17,171 dwellings over the plan period.

Figure 1

North Somerset SHLAA: Land Availability Summary		
Housing requirement		
A	Core Strategy housing requirement 2006-2026	14,000
B	Completions 2006-2011	4,950
C	Residual dwelling requirement 2011-2026	9,050
Sources of supply		
D	Planning permissions on large sites (10+ dwellings) less a lapse rate of 0.73% (excluding Weston Villages)	1,690
E	Planning permissions on small sites (1-9 dwellings) less a lapse rate of 9.43%	450
F	Weston Villages: sites with planning permission/subject to S106	1,000
G	Weston Villages: remaining strategic allocation	4,500
H	Remaining Replacement Local Plan allocations	591
I	Identified potential (excluding Weston Villages)	2,270
J	Empty homes (10 dwellings pa)	150
K	Windfall (2021-2026) (See section 12 of ED/09 SHLAA)	1,570
L	Potential supply 2011-2026	12,221
M	Overall potential supply 2006-2026 including completions	17,171
Five year supply		
N	Core strategy five year supply target	3,016
O	Available supply 2011-2016	4,181
P	Years supply at April 2011	6.9 years
Figure 1: SHLAA summary		

- The SHLAA Appendix: Sites Schedule (ED/09a) summarises the identified potential (consistent with the spatial strategy) and the discounted potential. The latter is sub-divided into sites initially assessed as being locationally broadly consistent with the spatial strategy but

discounted for other reasons (3,173 dwellings) and other sites which have been discounted due to incompatibility with the spatial strategy. If further capacity was to be required over and above the SHLAA identified potential, then this schedule of sites broadly consistent with the spatial strategy would be the starting point for further assessment.

Additional (non-SHLAA) sites at towns and service villages

5. SHLAA sites are indicative only of development potential and in reality there are alternative options or sites which could come forward in conformity with the spatial strategy. Other sites may come forward either in addition to or as alternatives to sites identified by the SHLAA process. Detailed site assessment will take place through the Sites and Policies DPD and Neighbourhood Plans. The latter are an opportunity to provide development opportunities over and above the Core Strategy requirement.

Density

6. The Core Strategy and SHLAA are based on an average net density across North Somerset of 40dwellings/ha (dph), adjusted as appropriate to take account of local circumstances.
7. Density assumptions have been incorporated into the dwelling estimate at Weston Villages based on broad design and layout considerations. An average net density of 40dph is identified, although this will vary with higher density development closer to the village centres (See Weston Villages draft Supplementary Planning Document September 2011 ED/10). Increasing net densities would have implications for the employment led approach, since greater number of houses would require additional employment land.
8. Given the absence of market demand for apartments in Weston and any tradition of high density/high rise apartment-style buildings away from the sea front, it is unlikely that higher density development would be appropriate. Recent densities achieved on strategic sites are 33 dph at Locking Castle in Weston-super-Mare, and 36.6 dph at Portishead Ashlands.
9. In conclusion therefore there is little scope for increasing density to increase supply.

Windfalls

10. Although not eligible to contribute towards land supply until beyond the first 10 years in terms of the PPS3 approach, North Somerset can nevertheless demonstrate a strong historic supply of housing from windfall sites, with no indication that this will change.
11. Total windfall completions over the last five years comprised 1,568 dwellings with an annual average of 314 (see Table 1). This represented an increase from the 2001-2006 annual average of 253 (see Table 2) despite the Replacement Local Plan's more restrictive approach to rural

development (Policy H/7). The SHLAA in accordance with government guidelines only makes allowance for windfall beyond the first 10 years which is estimated to be 1570 dwellings 2021-2026. Expected windfall figures 2011-2026 based on past 5 year average are likely to be in the region of 4706. Once completed these dwellings will be counted against the housing requirement.

12. The Core Strategy approach is not significantly different from that of the Replacement Local Plan. While the Core Strategy provides some more flexibility in respect of development in villages, the number of smaller villages with settlement boundaries is reduced. Concerns about 'garden grabbing' may have an impact (although the Replacement Local Plan Policy GDP/3 has meant that in practice account is already taken of local environmental factors), as will the NPPF approach to supporting sustainable development and also the impact of Neighbourhood Plans. Overall, the Council's assessment is that windfall will continue to come forward at current rates and will make a significant contribution to the housing trajectory.

Table 1
Total windfall sites
2006-2011

	Clevedon	Nailsea	Other	Portishead	Weston	TOTAL
2010/11	9	2	61	3	113	188
2009/10	60	58	159	51	126	454
2008/09	-3	9	60	23	192	281
2007/08	63	9	66	12	214	364
2006/07	20	11	73	39	138	281
Total 5 years	149	89	419	128	783	1568
5 year average	30	18	84	26	157	314

Table 2
Total windfall sites
2001-2006

	Clevedon	Nailsea	Other	Portishead	Weston	TOTAL
2005/06	41	26	33	119	75	294
2004/05	41	5	67	99	85	297
2003/04	31	2	16	84	64	197
2002/03	18	9	13	107	59	206
2001/02	41	3	11	106	112	273
Total 5 years	172	45	140	515	395	1267
5 year average	34	9	28	103	79	253

Re-allocation of longstanding employment allocations.

13. The employment-led approach within the Core Strategy to redress the imbalance between jobs and homes means that priority is given to protecting a range of employment opportunities. However this does not mean that all sites are protected as sites which are unattractive to the market could be put to more effective use.
14. SHLAA identified two potential opportunities at Moor Lane Backwell (SHL124) for 52 dwellings and 298 dwellings at Weston-super-Mare (SHL 96). While other opportunities may be explored through the Sites and Allocations DPD and Neighbourhood Plans, this is unlikely to be a significant source of supply given the employment-led approach.

Lapsed sites

15. There are a few sites with lapsed planning consents which are not already subject to a site allocation. When applying the Core Strategy approach they are still appropriate for development and could be identified through the Sites and Policies DPD, however this only totals 13 dwellings and so is not significant.

ii) Opportunities inconsistent with the Core Strategy spatial strategy

More dispersed development

16. SHLAA sites were identified in terms of their broad conformity with the spatial strategy of the Core Strategy. One contingency which has been suggested by objectors could be to relax the Core Strategy approach to development in rural areas. This could be achieved in a number of ways such by identifying more villages as potential locations for growth, including more settlement boundaries or drawing settlement boundaries more loosely.
17. Relaxing the spatial strategy in this way would lead to sporadic unsustainable development contrary to PPS1 and PPS3 and the draft NPPF and is not supported by the Council.

Identify strategic scale development at selected settlements

18. Some objectors have proposed that larger scale quantum of growth than that envisaged in the Core Strategy are allocated at specific towns and villages. Depending on the level of contingency sought, this could range from additional growth at a settlement containing a good range of local services and facilities to a new/expanded settlement proposal. The Council does not support this approach on sustainability grounds.

Development in the Green Belt

19. The Coalition Government has re-iterated the importance of Green Belts and this is supported in the draft NPPF. Very special circumstances need to be demonstrated to change Green Belt boundaries which the Council argues has not been the case. The Council's position is that all alternative contingency opportunities need

to have been rigorously assessed and exhausted before Green Belt opportunities are considered. This includes both potential local Green Belt adjustments around settlements such as Nailsea, and also the strategic Green Belt proposals which will have a much wider sub-regional impact such as a SW Bristol urban extension.

20. It is noted that in the case of the Bristol Core Strategy (ED/24) that the Inspector concluded that if required, consideration would be given to the use of some Green Belt land as a long-term contingency (Policy BCS5) – but the land at SE Bristol remained designated as Green Belt and was not designated as safeguarded land.

Summary

21. If additional housing supply was required over the 14,000 dwellings identified then the approach should be as follows:

- i) Maximise opportunities consistent with the existing spatial strategy
 - Assess the identified potential of SHLAA sites (17,171 dwellings 2006-2026).
 - Recognise the contribution of windfall sites 2011-2021 (3,140 dwellings).
 - Consider whether there is any scope from sites discounted by SHLAA but broadly consistent with the spatial strategy.
 - Investigate other sites not identified by the SHLAA process.
 - Density increases (likely to be limited).
 - Re-use of employment allocations (likely to be limited).
 - Lapsed sites (insignificant).

- ii) Only if supply sources from i) were insufficient, should options inconsistent with the Core Strategy spatial strategy be assessed. These could include the following:
 - More dispersed development.
 - Strategic scale development at selected settlements.
 - Green Belt development at both inner and outer edge.

All of ii) are in conflict with the Core Strategy spatial strategy and current and draft national guidance, and the potential contribution they could make to housing supply is difficult to predict.