

NORTH SOMERSET SITE ALLOCATIONS PLAN EXAMINATION

MATTER 2

HOUSING

POSITION STATEMENT

ON BEHALF OF

MACTAGGART AND MICKEL HOMES LTD



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1. Introduction

1.1 This Position Statement sets out a brief response on behalf of Mactaggart and Mickel Homes (MM) to the Inspector's questions in relation to Matter 2.

1.2 It should be read in conjunction with MM's submissions to:

- North Somerset Site Allocations Plan Consultation Draft (April 2016) (MM1)
- North Somerset Site Allocations Plan Publication Version (December 2016) (MM2)
- Position Statements relating to other matters identified by the Inspector for consideration at the Examination.

2. Issue 2.1

Would the scale of housing to be delivered on allocated sites in the SAP provide for new housing in accordance with the requirements of the CS in relation to:

- i The scale of development identified in Policy CS13.*
- ii The distribution of development in accordance with Policy CS14.*

- 2.1 The CS requirement identified in Policy CS13 is expressed as a 'minimum'. The housing requirement is an expression of homes that are needed during the Plan period to accommodate objectively assessed needs. It is therefore not simply a numerical figure for which it can be shown planned provision is made in a Development Plan Document. It is an imperative to ensure that the requirement is 'delivered' during the Plan period.
- 2.2 The recent Housing White Paper (HWP)¹ brings into the sharp focus the implementation gap between planning permissions being granted and new homes built. It acknowledges that more than a third of new homes that were granted planning permission between 2010/11 and 2015/16 have yet to be built².
- 2.3 In the light of the above, to ensure that the minimum level of housing necessary is actually delivered during the Plan period, the SAP should aim to exceed the Core Strategy requirement of a minimum of 20,985 dwellings. Whilst the Council will no doubt argue that it already does this since, based on their consequential changes to Table 1 (SD20), total provision is identified as 21,281 dwellings, this is a very small overrun and fails to factor in any non-implementation allowances.
- 2.4 If a modest non-implementation allowance of 10% is set against the proposed allocations and sites with extant planning permission, the current provisions fall short of the overall requirement by 943 dwellings. Given the recent evidence in the HWP, it is arguable that a much higher non-implementation allowance would be justified. In their original

¹ Fixing our broken housing market, DCLG, February 2017

² Ibid, p.13

representations MM suggested variable allowances to reflect the uncertainties relating to different elements of supply, which reduced the Council's capacity by 1,440 dwellings³.

- 2.5 The allocated sites in the SAP are therefore currently unlikely to 'deliver' within the Plan period the scale of development identified in Policy CS13.
- 2.6 With regard to the distribution of development in accordance with Policy CS14, the SAP fails to provide for the minimum distribution to the second tier settlements of Clevedon, Nailsea and Portishead where 'most' additional development is to take place outside Weston-super-Mare. Based on Table 1 of SD20, provision is made for only 5,008 dwellings against a minimum requirement of 5,100.
- 2.7 For reasons adduced earlier, to ensure the 'delivery' of 5,100 dwellings during the Plan period requires provision to be made for considerably in excess of the minimum requirement. Applying a conventional 10% non-implementation allowance means that provision should be made in the SAP for at least 5,610 homes. In the light of the HWP, a considerably higher level of provision could be justified.
- 2.8 Comparing the provisions in Table 1 of SD20 with Core Strategy Policy CS31, the largest contributory factor to the deficit is the under-provision of dwellings at Nailsea. The CS minimum requirement of 1,100 dwellings is undershot by more than 50 dwellings, assuming that the capacity in Table 1 is delivered in full during the remainder of the Plan period.
- 2.9 Additional provision therefore needs to be made to meet the Core Strategy requirements for the second tier settlements of Clevedon, Portishead and Nailsea. Given the constraints of Green Belt and Flood Risk at Clevedon and Portishead, together with the lack of significant growth at Nailsea for nearly two decades which is reflected in the age profile of the town's population⁴, the SAP should make additional provision at Nailsea.
- 2.10 To make good the shortfall against the minimum requirement, and to factor in an appropriate non-implementation allowance to reduce the risk of delivery failures and therefore the identified housing needs not being met, provision is required for at least an additional 600

³ MM2, para. 2.4, Schedule 2.1

⁴ MM2, para. 3.12 and Schedule 3.1

dwellings. The majority of this (450-500 dwellings) should be accommodated through allocation of further land at Nailsea⁵.

- 2.11 Having regard to the foregoing, the overall conclusion is therefore that the scale of housing to be 'delivered' on allocated sites in the SAP would fail to provide for new housing in accordance with the requirements of the CS in relation to either the scale of development identified in Policy CS13, or the distribution of development in accordance with Policy CS14. The Inspector's question correctly relates to housing 'delivery' and 'provision' in relation to Core Strategy requirements, a focus that is endorsed by the recent HWP. As a matter of fact insufficient 'provision' is made in the SAP against the requirements Policy CS14. It will therefore fail to deliver the CS requirements. Moreover, to ensure 'delivery' and 'provision' of the housing required by Policies CS13 and CS14, the land allocations in the SAP should exceed the 'minimum' requirement to be 'met' by a considerable margin to allow for non-implementation of a proportion the allocated/permitted capacity. A sufficient margin has not been accommodated in the SAP.

⁵ For reasons set out in MM2, paras. 3.15-3.29 and Schedule 3. 1, and discussed further in relation to Issue 2.2 below, the additional requirement may be considerably greater.

3. Issue 2.2

In terms of the delivery of the housing sites allocated in the SAP and by the Council in the proposed further amendments of February 2017 (SD20), taking each of the following settlements in turn:

- i Are there any sites which should be excluded from the list of sites identified in Schedule 1 to the SAP and by the Council in the proposed further amendments of February 2017 (SD20) in order for the SAP to be sound?*
- ii Having regard to additional information supplied with examination document CD1 and Appendices, how likely is it that the sites allocated in Schedule 1 and the proposed amendments will deliver the housing requirement of the CS within the Plan period 2006 –2026?*
 - a. Weston-super-Mare*
 - b. Clevedon*
 - c. Nailsea*
 - d. Portishead*
 - e. Winscombe*
 - f. Yatton*
 - g. Backwell*
 - h. Congresbury*
 - i. Churchill*
 - j. Banwell*
 - k. Bleadon*
 - l. Uphill*
 - m. Barrow Gurney*
 - n. Failand*
 - o. Sandford*
 - p. Tickenham*

iii Is it appropriate to include an allowance for windfall development within the calculation of housing provision in Table 1 to the SAP?

- 3.1 MM continue to have reservations about the deliverability of the allocated capacity at Weston-super-Mare. The reasons are outlined in MM1 and MM2, and are of both a general and site-specific nature.
- 3.2 In general terms, in their response to Issue 1.4, MM have drawn attention to the large number of sites that have been allocated subject to flood risk assessment and sequential/exception tests accompanying future planning applications, which, without prejudging those assessments, there can be no certainty will be satisfied. No fewer than 12 sites are allocated on such a basis at Weston-super-Mare with a total capacity of 1,114 dwellings (nearly 13% of the allocated capacity at Weston-super-Mare).
- 3.3 The capacity at Weston-super-Mare is also considerably reliant on sites that have been carried forward from the Replacement Local Plan. No fewer than 10 sites have previously been allocated, with an aggregated capacity of 464 dwellings. This endorses the findings of the recent HWP relating to the gap between sites with positive planning status and actual housing delivery from them. Whilst the Council's evidence in CD1b indicates that some of the sites are finally coming forward, it also confirms that uncertainties remain in relation to several of them, including Royal Pier Hotel (63 dwellings), Westacres Caravan Park (130 dwellings) and Bridge Farm, Bristol Road (73 dwellings).
- 3.4 Given that the above sites have been allocated in an adopted Local Plan for a period of 10 years, and will have been identified as sites having development potential some time before that, a very cautious approach should be taken to them⁶. The onus must be on the Council to clearly demonstrate their deliverability within the current plan period. It requires more than a positive statement of intent by a landowner and/or their agent, which is an inevitable response to the question that is asked. There must now be clear evidence of progress towards delivery, including an interested developer actively progressing a scheme. As correctly acknowledged by Inspector Bore:

⁶ In MM2 it was suggested application of a non-implementation allowance of 50% to these sites (para. 2.4, Schedule 2.1)

The fact that these proposals have not come forward suggests in certain cases either unwillingness to develop or impediments to development. Some sites now have development interest but others have active uses and there is no certainty that all these sites will come forward.⁷

- 3.5 Delivery at Weston-super-Mare is also heavily reliant on the capacity of the Weston Villages, which accounts for nearly 70% of the Plan's provisions for the town. The delivery trajectory is ambitious given the progress to date. Whilst it is accepted that delivery rates are likely to increase during the second half of the Plan period given that strategic infrastructure has been put in place and development at both of the villages is under way, there can be no certainty that the delivery trajectories can be achieved. That for Parklands Villages seems particularly challenging, and there is little explanation as to how it can sustain delivery rates that are consistently almost double that of Haywood Village. It also appears a little contrived that the delivery trajectories for both villages end with the Plan period with each village having yielded its full capacity in the final year.
- 3.6 Whilst appreciating that delivery rates are agreed with the developers through the Weston Villages Joint Delivery Review Board, circumstances can rapidly change to affect the future outlook. Given the economic uncertainties ahead in the context of the Brexit negotiations, there is a high probability that the currently anticipated scenario will change.
- 3.7 In determining the recent Appeal relating to Land south of Knightcott Road, Banwell, Inspector Pope commented that the delivery rates at the Weston Villages were 'very challenging'⁸. He discounted 300 dwellings from the Council's assessment of the contribution that the Weston Villages could make to the five year supply⁹. Whilst that adjustment is now reflected in CD1b, there has been no adjustment to the overall trajectory that still indicates the Weston Villages yielding their full capacity during the Plan period.
- 3.8 In his recent report (November 2016) on his re-Examination of the remitted Core Strategy policies, Inspector Bore acknowledged that the Weston Villages account for a 'substantial part' of the District's housing requirement, and identified risks to delivery from three potential factors:

⁷ Report on the Examination into the Soundness of the Consequential Changes to Policies CS6, CS14, CS19, CS28, CS30, CS31, CS32 and CS33 of the North Somerset Core Strategy, 8 November 2016, para. 20

⁸ Appeal Decision APP/D0121/W/15/3138816), 13 October 2016, para. 38

⁹ Ibid, para. 39

- The employment-led approach set out in Policy CS20, it representing a challenge to raise employment provisions to the planned level.
- The ‘inevitability’ that projects the size of Weston Villages will encounter practical Obstacles to implementation.
- The variance of build rates according to the prevailing economic climate, the consequence of just a modest slippage in delivery against the indicated trajectory being a diminished contribution of this source towards the total requirement.¹⁰

3.9 The provisions of the SAP are highly exposed to the delivery risks identified above given the ‘substantial part’ of the District’s housing requirement that they account for, the reliance placed on the Weston Villages yielding their full capacity during the Plan period, and the absence of headroom for delivery failures in the overall provisions of the SAP.

3.10 With regard to other provisions at Weston-super-Mare, Inspector Bore also acknowledged as follows:

The emphasis in Weston-super-Mare is on regeneration. With the Council owning key sites and the Homes and Communities Agency involved, the probability is that the bulk of the overall housing requirement can be delivered within the plan period. But some of the sites in Weston-super-Mare will be complicated to develop, with demolition, piling and remediation involved in certain cases. There is potential for slippage, as is often the case with complicated sites.¹¹

3.11 Through CD1a and CD1b the Council places great reliance on the involvement of the HCA in facilitating the delivery of key regeneration sites. However, as acknowledged by Inspector Bore, that does not guarantee their delivery owing to the complications of their remediation and development.

3.12 In their original representations MM expressed reservations regarding the delivery of two key regeneration sites in particular, relating to Land South of Herluin Way (Avoncrest site) and

¹⁰ Report on the Examination into the Soundness of the Consequential Changes to Policies CS6, CS14, CS19, CS28, CS30, CS31, CS32 and CS33 of the North Somerset Core Strategy, 8 November 2016, para. 18

¹¹ Ibid, para. 17

the Gasworks Site¹². These sites have a combined identified capacity of 990 dwellings (albeit 24% higher than the capacity indicated in the HELAA).

- 3.13 MM retain their reservations about the deliverability of these sites. The evidence in CD1b in relation to the Avoncrest site is that consultants have only just been appointed to devise a strategy for ground investigations and remediation. Given that the site is a former tip, the necessary site reclamation works could be both extensive and expensive, and take a long time to resolve. It seems highly optimistic that an application will be submitted by the end of 2017. Moreover, given that there is at present no understanding of the contamination that might be present, it cannot be concluded whether the site is suitable for residential development, and if it is, when it might be available given the extensive reclamation work that is likely to be necessary. In addition to the reclamation uncertainties, flood risk (with requisite sequential and exception tests) has yet to be resolved. Moreover, the infrastructure requirements that the site must bear are very substantial, and will themselves add additional burdens of cost and time. There is therefore considerable uncertainty relating to the suitability and availability of this site at the present time.
- 3.14 With regard to the Gas Works, it is still in active use with no indication given as to the timing of its availability. It is perhaps pathological that there is no entry in CD1b relating to this site.
- 3.15 The uncertainties relating to the above two sites endorse the caution expressed by Inspector Bore that there is potential for slippage. These are unlikely to be the only two sites where that potential exists, albeit the consequences of slippage on these two sites alone would be significant for delivery of the housing requirement, both for Weston-super-Mare and overall, given that the Plan does not incorporate any headroom beyond the minimum requirement.
- 3.16 Some of the above criticisms also apply to the provisions of the SAP relating to Nailsea.
- 3.17 The largest site allocation at Nailsea (North-West Nailsea), accounting for nearly half of the allocated capacity for the town, has been allocated for development in two previous Local Plans (albeit not the North Somerset Local Plan Review), and previously benefited from outline planning permission, yet remains undeveloped¹³. It is subject to known constraints and is therefore of uncertain deliverability.

¹² MM2, para. 3.35, Schedule 3.2

¹³ See Position Statement on behalf of MM in relation to Matter 1, paras. 4.11-4.12).

- 3.18 The evidence of deliverability contained in CD1b corroborates the uncertainties. It is germane that the applicants' agents advised Inspector Bore at the Core Strategy Re-Examination in June 2016 that they were instructed to prepare a planning application for the site which was due to be submitted shortly. However, an application has yet to be submitted, and it now transpires that it will relate only to a first phase of the site. The evidence confirms the constraints to development in terms of multiple landownerships, overhead power lines and flood risk. Even if the first phase is brought forward, there is no certainty that the site can yield its remaining capacity during the residue of the Plan period, and no evidence in CD1b to confirm to the contrary.
- 3.19 Given the quantum of housing to be delivered and less than half of the Plan period remaining, the allocation strategy in the SAP should focus on minimising uncertainties, not perpetuating them. This is endorsed by the recent HWP. Continued reliance on an allocation at North West Nailsea, with its past evidence of delivery failure that accounts for the ageing population profile of the town and the complete lack of affordable housing delivery, would be inconsistent with this strategy. If any reliance is to be placed on housing delivery from the allocated site at North West Nailsea, then it should only be towards the residual capacity for which provision has not currently been made in the SAP. Reliance is inappropriately placed on the allocation at North West Nailsea for delivering nearly half of the allocated capacity at the town when there are immediately deliverable sites available, such as land North of Youngwood Lane, that is well advanced in the development management planning process, free from planning and other constraints, and performs similarly, if not better, in the SA¹⁴.
- 3.20 There are also uncertainties relating to other site allocations at Nailsea. Land south of the Uplands was previously allocated for 100 dwellings, but the capacity has now been halved owing to the discovery of a restrictive covenant precluding development on part of the site. For reasons set out in MM2, the originally identified capacity for 100 dwellings was considered to be highly aspirational, and the reduced capacity on a smaller site area remains unproven. There is also an issue relating to loss of playing field/public recreation space which has yet to be addressed. The site is in District Council ownership, and there is no evidence of developer interest at this stage.

¹⁴ See MM's Position Statement in relation to Matter 1, paras. 4.3-4.12

- 3.21 The site at Trendlewood Way has been identified for residential development since 2013, but there has been no progress made in bringing it forward, and no developer is currently associated with it. Given that it is within the existing settlement limits of Nailsea there would have been no constraint on it coming forward since 2013, or within previous local plan periods when few competing sites were available. It is therefore uncertain that the site will come forward during the current local plan period, and no reliance should be placed on it as an allocation. That will not prevent it coming forward during the current local plan period as a windfall site within the existing settlement boundaries.
- 3.22 The uncertainties that relate to the selection of the site West of Engine Lane¹⁵ are compounded by the requirements of the landowner, Nailsea Town Council, to control the mix of housing. That raises the prospect of a scheme that it will not be commercially acceptable to the developer.
- 3.23 Having regard to the foregoing considerations, MM maintains the position set out in their original representations¹⁶ that the deliverable capacity at Nailsea during the residue of the current Plan period, is little more than 200 dwellings. Even if this is a conservative estimate, it necessitates the immediate release of additional capacity of circa 500 dwellings for there to be any prospect of the requirement for the town (expressed in Core Strategy Policy CS31) being delivered.
- 3.24 Having regard to all of the foregoing considerations the concerns of Inspector Bore would appear to be manifest in the current provisions of the SAP:

... whilst there is no reason to anticipate the failure of the strategy, there is potential for slippage and under-delivery. The Council has been optimistic in its approach to the residual requirement that needs to be provided through the Site Allocations Plan.¹⁷

The expected contribution from these sites is substantial but, as with older allocations, there is potential for slippage.¹⁸

¹⁵ See Matter 1, Issue 1.3(i) raised by the Inspector and MM's response

¹⁶ MM1, para. 3.23, Schedule 3.1

¹⁷ Report on the Examination into the Soundness of the Consequential Changes to Policies CS6, CS14, CS19, CS28, CS30, CS31, CS32 and CS33 of the North Somerset Core Strategy, 8 November 2016, para. 22

¹⁸ Ibid, para. 21

- 3.25 The imperative for the SAP is to allocate a portfolio of sites that minimises these identified risks, and provides contingencies for them, which it currently fails to do. For reasons set out in MM2, it is MM's view that additional sites for approximately 1,500 dwellings need to be identified in the Plan¹⁹.
- 3.26 With regard to windfalls, the allowance that is made is simply a continuation of a trend based forecast, and is apportioned by area based on previous delivery. There is no 'compelling evidence' that such sites will continue to provide a reliable source of supply, as is required by the NPPF (para. 48).
- 3.27 Given, for the reasons outlined above, the SAP barely makes sufficient overall provision to meet the Core Strategy housing requirement, and the clear risks of delivery failures that have been identified, windfalls should be construed simply as a means of reducing the likely underprovision arising from such delivery failures. As such, it is arguable that no allowance should be made for them within the calculation of the provisions for housing that the SAP should make. Given that the identified windfall allowance amounts to less than 7% of the identified capacity in Table 1, it falls short even of a 10% slippage allowance which is a normal contingency to include in a Plan.

¹⁹ MM2, para. 2.14, Schedule 2.2

4. Issue 2.3

In terms of providing for a five year housing land supply (HLS):

- i What is the most up to date calculation of delivery in the period since the start of the Plan period in 2006?*
- ii What is the level of shortfall in provision against the CS requirement for the first part of the Plan period?*
- iii Does the Sedgefield approach to the calculation of HLS with a 5% buffer as identified by the Inspector in his report on the Core Strategy remain the most appropriate methodology for delivery?*
- iv Having regard to the evidence on the delivery of allocated sites under Question 2.2, how likely is it that the SAP would deliver a five year supply of housing at the time of adoption in accordance with either:*
 - The Sedgefield approach with a 5% buffer.*
 - The Sedgefield approach with a 20% buffer.*

4.1 MM have reviewed the detailed 'Evidence on Housing Need and Supply Matters' prepared by Pegasus Group on behalf of Persimmon Homes Severn Valley, and are in broad agreement with it as representing a realistic and reasonable position as regards the five year housing land supply based on current evidence, that is a base date of April 2016. Subject to the updated figures to April 2017 being made available in sufficient time, it is anticipated that an updated position, rebased at April 2017, may be available before the Examination, and also that an agreed position on behalf of the development industry may be presented in a Statement of Common Ground. In the light of all of the above, MM's current position is stated succinctly below.

4.2 The most up-to-date calculation of delivery is 7,995 dwellings to April 2016, averaging 800 dwellings per annum against an annual requirement of 1,050 dwellings, excluding any backlog.

- 4.3 Given the delivery to date, the level of shortfall for the first half of the Plan period is 2,948 dwellings. Therefore, approximately 24% of the homes needed during the first half of the plan period have not been provided.
- 4.4 The Sedgfield approach is 'essential' given that only half of the Plan period remains to clear the backlog, and there is likely to be a step change increase in the requirement through the emerging JSP. The local planning authority has not suggested otherwise, and has not been working with neighbouring authorities under the Duty to Cooperate to find alternative means of redressing the backlog. The latter is the only alternative approach allowed for in the PPG where any undersupply cannot be dealt with in the first five year period. Moreover, in none of the plethora of recent Appeals decisions since Inspector Bore's report was published has an alternative view been taken.
- 4.5 Whilst the Sedgfield approach is the appropriate methodology, given that there is clear evidence of persistent under-delivery, the buffer should be 20%. By his own admission, Inspector Bore did not conduct a full five year housing land supply investigation, and no such detailed evidence was available to him at the Examination. However, subsequent Section 78 Appeals decisions that have involved such forensic scrutiny, and at Inquiries that post-date the Examination in June 2016, have found to the contrary and that the 20% buffer should be applied.
- 4.6 The evidence provided by the Pegasus group is clear and unequivocal, that in the last consecutive 8 years, the annualised housing requirement has not been met. Therefore, for 80% of the first half of the plan period, equating to the 10 years suggested by Inspector Pope in the Banwell decision as necessary to transcend economic cycles, delivery has fallen short of the requirement, which itself falls short of objectively assessed need. The scale of the backlog corroborates the persistence of under-delivery, which the evidence of the Pegasus Group demonstrates is cumulative and worsening.
- 4.7 The detailed analysis of the Pegasus Group confirms that, whether a 5% or 20% buffer is applied, the SAP will fall well short of delivering a five year housing land supply at the time of adoption. It endorses the conclusions reached on the level of supply in the Housing Land Supply Assessment undertaken by MM in November 2016 and submitted to North Somerset Council in conjunction with their current application for outline planning permission relating to



land north of Youngwood Lane, Nailsea²⁰. Even based on the Council's own assessment of the deliverable supply, the SAP falls considerably short of delivering a five year supply based on a 20% buffer and barely achieves it based on a 5% buffer. However, as the evidence of the Pegasus Group clearly demonstrates, the Council's assessment of deliverable supply is so aspirational as to be unrealistic. A commonsense conclusion is that the actual deliverable supply will fall well short of five years upon adoption based on current commitments and the current provisions of the SAP.

²⁰ Application Ref: 16/P/1677/OT2



5. Issue 2.4

What provision could be made if the evidence suggests that the submitted SAP would not be able to deliver a five year supply at the time of adoption?

- 5.1 The response to this question depends, at least in part, on the reasons for the shortfall. However, the simple answer is the allocation of alternative sites that can make an early contribution to housing delivery.
- 5.2 A pragmatic response would be to allocate alternative sites that perform well in the SA and that are well advanced in the development management process. A prime example is MM's interest relating to land north of Youngwood Lane, Nailsea (Application Ref: 16/P/1677/OT2). For reasons adduced in relation to Matter 1, this site performs as well, if not better, in the SA than the principal allocated sites at North West Nailsea and Engine Lane. The outline application has confirmed that there are no overriding constraints, and that is now reflected in the emerging West of England Joint Spatial Plan in which the site is included in a wider area west of Nailsea that is identified as suitable for future strategic development.
- 5.3 The only issue is therefore the timing of release of the Youngwood Lane site. For reasons set out in relation to Issues 2.1 and 2.2 above, there is a need to allocate additional land at Nailsea, both to 'meet' the requirements of Core Strategy Policy CS31 and to compensate for the delivery constraints affecting the allocated sites, in particular the long-standing allocation at North West Nailsea which, even according to the Council's own trajectory, can make only a limited contribution to the five year supply. The need to enhance the five year land supply at the time of adoption would contribute to the weight of the case in favour of allocating the site north of Youngwood Lane in the current Plan.
- 5.4 There are other sites elsewhere in the district that are in sustainable locations and are similarly well advanced in the development management process that could make a further, early contribution to housing delivery, and therefore to alleviating the shortfall in the five year supply. The allocation strategy should therefore be reviewed to focus on sites that are capable of early housing delivery, either in addition to, or in place of, existing allocations that are unable to make such a contribution.



- 5.5 The recent HWP supports the release of more small and medium sized sites. The site north of Youngwood Lane is a medium sized site that can contribute to housing delivery at an early stage. It is therefore entirely in accordance with the Government's emphasis in the HWP on boosting housing delivery.



6. Issue 2.5

Having regard to the distribution of new housing in CS Policy CS14 with its concentration in the Weston urban area and Weston Villages, how appropriate would it be to consider a stepped trajectory for the delivery of new housing over the Plan period?

- 6.1 Given that more than half of the Plan period has already expired, and the existing backlog, a stepped trajectory is unlikely to deliver the housing requirements during the Plan period. It risks further back-loading a delivery trajectory that is already skewed towards the end of the period, and that is already at risk of falling short of the requirement.
- 6.2 A more appropriate strategy is to adjust the portfolio of sites to reduce the risk of delivery failures and enhance the prospects of an early contribution to housing supply.

