



The Planning Inspectorate

Report to North Somerset Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO POLICY CS13 AND SUPPORTING TEXT OF NORTH SOMERSET COUNCIL CORE STRATEGY

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 8 July 2011

Examination hearings held between 18 and 20 March 2014 and 6 and 7 January 2015

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Abbreviations Used in this Report

HMA	Housing Market Area
JSPS	Joint Strategic Planning Strategy
LDS	Local Development Scheme
NPPF	National Planning Policy Framework
NPPG	National Planning Procedure Guidance
ONS	Office of National Statistics
RPG	Regional Planning Guidance
RS	Regional Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SNPP	Sub-National Population Projections
SWRSS	South West Regional Spatial Strategy

Non-Technical Summary

This Report concludes that Policy CS13 of the North Somerset Core Strategy provides an appropriate basis for the planning of the District provided that a number of Main Modifications are made to the policy and to the supporting text. The North Somerset Council has specifically requested me to recommend any modifications necessary to make the policy and text capable of being adopted.

All of the modifications to address this were proposed by the Council and I recommend their inclusion after considering the representations made by other parties on these issues.

The Main Modifications are set out as the MD6(a) version of the policy and text attached as Appendix A to this Report. They can be summarised as:

- The increase of the housing requirement set out in Policy CS13 from 13,400 to 20,985.
- The provisions of Policy CS13 i.e. the identification of sites and the delivery of the housing requirement will be applied on the basis of any new housing requirement for North Somerset which is specified by the adopted version of the forthcoming Joint Strategic Planning Strategy.
- The inclusion in the policy and text of clear and firm commitments to a review of the policy by the end of 2018.
- The inclusion in the text of a clear and firm commitment to the dealing at the review stage with any backlog in provision which arises before 2018.

Introduction

1. This Report contains my assessment of Policy CS13 and its supporting text of North Somerset Council's Core Strategy Development Plan Document in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Policy's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Policy is sound and whether it is compliant with legal requirements. Paragraph 182 of the National Planning Policy Framework (NPPF) makes clear that, to be sound, a Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the Examination is the assumption that the Council has submitted what it considers to be a sound plan and my Examination of Policy CS13 is based on the version of the policy and text submitted for Examination in July 2011. However, since that time and at various points in the Examination process, the Council has proposed a number of Main Modifications. I refer to the Main Modifications proposed in March 2014 as the MM1 and MM1(a) versions of the policy and text and the proposed Main Modifications considered at the January 2015 Hearings as the MD6 and MD6(a) versions. In accordance with Section 20(7C) of the 2004 Act the Council has requested that I should make any modifications which are necessary to rectify matters that make the policy unsound and/or not legally compliant and thus incapable of being adopted. The Main Modifications which I consider are necessary in this regard are set out in Appendix A to this Report.
3. The Main Modifications which are proposed by the Council and are necessary all relate to matters which were discussed at the Examination Hearings.
4. The background to my Examination is somewhat complex and I will, therefore, set out below the context within which it was undertaken.

Background

5. The Core Strategy was submitted for Examination in July 2011. As part of the original Examination, Hearings took place in November and December 2011 and the Inspector's Report was provided to the Council in March 2012. The Council adopted the Core Strategy in April 2012. However, the Council's adoption of the Core Strategy was challenged through the Courts. The Court's judgment concluded that the original Inspector:

'failed to give adequate or intelligible reasons for his conclusion that the (housing requirement – my insertion) figure made sufficient allowance for latent demand i.e. demand unrelated to the creation of new jobs.'

6. The Court's decision was that Policy CS13, which sets out the number of dwellings which the Council would need to provide during the Plan period, should be remitted to the Examination stage. The Policy was to be treated as not having been examined.

7. The judgment makes clear that it would only be the adoption of Policy CS13 which would be unlawful. However, re-examination of other policies could be necessary if the provisions of Policy CS13 required change. For this reason, housing Policies CS6, CS14, CS19, CS28 and CS30-33 were also remitted to the Examination stage in order that any consequential changes arising from re-examination of Policy CS13 could be addressed.
8. In line with the judgment, I consider that Policy CS13 needs to be examined first against the tests of whether it is legally compliant, justified, effective, positively prepared and consistent with up-to-date national policy. It is only when I have reached a firm conclusion on the soundness and legal compliance of that policy that there can be any certainty about the need for any consequential changes to the other policies which were remitted for Examination. If I find that Policy CS13 is sound and legally compliant, either in its original form or in a modified form, the Council would first need to decide whether it wishes to adopt the Policy. If it decides that the Policy should be adopted in a modified form then it will need to consider what consequential changes are required to the other remitted policies to ensure delivery of the provisions of Policy CS13. Any changes which are necessary, other than minor modifications, will need to be subject to further re-consultation and Examination. The Council agrees with this approach and, whilst some consequential changes to other remitted policies were put forward to the Hearings in March 2014, the Council made clear at that time that it did not wish these to be considered by my Examination. No consequential changes have been put forward by the Council in respect of the later revisions to the Policy and text and, so far as I am aware, the work to draw them up has not yet been completed. In these circumstances only Policy CS13 and its supporting text is before me for Examination and my Report deals only with Policy CS13 and its supporting text.
9. Paragraph 24 of the Approved Addendum Judgment stated that it would not be appropriate:

'to restrict the examination to the question of whether the figure of 14,000 dwellings in CS13 makes adequate provision for latent demand.'

In these circumstances, my Examination is based on the whole of the background evidence, the Policy and its supporting text. I have not read the original Inspector's Report. As the policies in question are remitted to the Examination stage, the original Inspector's Report does not form part of the evidence before me and I wish to avoid the possibility of being influenced by his reasoning and conclusions.

10. As part of the Examination process I held Hearings sessions on 18-20 March 2014 and 6-7 January 2015.

Proposed Main Modifications

11. Before I commenced my Examination, the Council decided, on the basis of new evidence which it had collected, to modify Policy CS13 and its supporting text. The provisions of Policy CS13 which it had originally intended to adopt were abandoned. The Council re-consulted on the modification and undertook a supplementary Sustainability Appraisal (SA) exercise. That proposed

modification is referred to as the MM1 version of the Policy and text. My Hearings in March 2014 dealt with the MM1 version.

12. During the March 2014 Hearing sessions the Council provided me with an e-mail which requested that I should recommend any Main Modifications which were necessary to make Policy CS13 sound. I explained that I was not in a position to agree to this request until I knew the extent of the Main Modifications which might be necessary; my concern being that the necessary Main Modifications could be so far-reaching that they would amount to a different Plan. Until I had heard the evidence I was not in any position to know whether this might be the case. I referred the Council to paragraph 4.27 of the 2013 *'Examining Local Plans Procedural Practice'* guidance in this regard. However, I informed the Council that, at that stage, I was willing to proceed with the Examination on the basis of the MM1 version of Policy CS13.
13. During the March 2014 Hearings the Council proposed further Main Modifications to Policy CS13 and its supporting text. I refer to these as the MM1(a) version. These later Main Modifications had not been subject to re-consultation or SA and, in these circumstances, I could not (and still cannot) give them formal consideration although they were discussed in the Hearings.
14. At the close of the March 2014 Hearings I undertook to provide a letter to the Council setting out my conclusions on the examination of Policy CS13 up to that point. Very briefly, I concluded that:-
 - a) Policy CS13 did not comply with national policy in that it was not prepared within a clear strategic context and that it was not informed by a full objective assessment of housing need which would be provided by a comprehensive Strategic Housing Market Assessment (SHMA) for the whole of an identified Housing Market Area (HMA);
 - b) Setting the Policy CS13 housing requirement figure at the lowest limit of the range of estimates put forward in the Council's new evidence did not comply with the national objective of significantly boosting housing supply and did not represent positive planning; and,
 - c) Although increased 'self containment' in terms of reducing out-commuting was a worthwhile objective, reliance on such an uncertain factor to justify adoption of a much-reduced housing requirement would be imprudent.

In these circumstances I concluded that I would need to find Policy CS13, whether in its original or modified forms, unsound.

15. The Council responded to my letter on 24 July 2014 and informed me that it proposed to make further modifications to Policy CS13 to address the concerns which I had raised. Further Main Modifications to Policy CS13 were prepared and a re-consultation exercise was carried out. These are referred to as the MD6 version of the Policy and supporting text. I held Hearings on 6 and 7 January 2015 to consider these proposed changes. During the course of the Hearings the Council proposed further changes to the MD6 modifications – I refer to these as the MD6(a) version. However, these were exclusively matters of clarification of the context of the Policy and I am satisfied that they can be

made without the need for a general re-consultation exercise. The Council informed me that, as the MD6/6(a) modifications broadly reflected an option which had already been the subject of SA and that no significant changes to affect the SA outcomes had taken place in the meantime, it considered that no further SA was necessary. I agree.

Inspector's Reporting Process

16. In March 2014 the Council argued that a housing requirement significantly greater than the 17,130 dwellings specified in the MM1 version of Policy CS13 could be inconsistent with the employment-led approach which underlies the spatial strategy of the adopted part of the Core Strategy. However, if the plan provisions which I am considering are unsound, and if changes to make them sound cannot be accommodated within the adopted parts of the Core Strategy, then that inconsistency would be for the Council to resolve. In the light of paragraph 17 of the Approved Addendum Judgment, I do not consider that I am bound to accept that a Plan policy must be sound because modification of that policy would make it out-of-step with adopted parts of the same Plan. I disagree with the argument made by a Representor that the judgement precludes me from dealing with Policy CS13 in isolation. I consider that paragraph 17 of the judgement was dealing with a different issue.
17. Some have argued that I should respond to the Council in a further letter rather than a formal Report. I disagree. The circumstances of this case are unusual. The legal judgement made clear that only part of the Core Strategy was being remitted for examination. It was inevitable, therefore, that any Report on the remitted policies, whether it be either in respect of Policy CS13 alone or Policy CS13 together with the other remitted policies, would be partial in that it dealt with only part of the Core Strategy. I accept that the judgement referred to only a single 'Examination' but the very nature of the judgement, which left part of the Core Strategy adopted whilst other parts had not been examined, indicated that the Court considered that elements of the same Plan could be considered independently. The thrust of the decision was clear that the other policies were remitted for Examination only because they may require consequential change if the originally submitted version of Policy CS13 was found unsound. In my view, dealing with Policy CS13 first is entirely within the spirit of the Court's decision. If the most appropriate way of dealing with the matter is by way of 2 Examinations or, perhaps as it should be seen more appropriately, 2 parts of the same Examination, then I do not consider that I am prevented from following that course.
18. By dealing with Policy CS13 first, I have adopted a process not dissimilar to that which is commonly used in the Examination of a Core Strategy and a Site Allocations Plan where the principles are established first and the details follow. In the case of housing requirements, such a 2 stage process prevents a large body of work on detailed provisions from being made abortive if the general principle proposed in the strategic housing requirement policy is found to be unsound.
19. Regarding the points raised by Representors in respect of the Gallagher Homes Ltd and Lioncourt Ltd vs Solihull Metropolitan Borough Council (CO/17668/2013) judgment, the NPPF makes clear that the housing requirement may need to be refined if meeting the assessed need would

significantly and demonstrably outweigh the benefits. In my view the Council has gone through this process: it has determined what it considers to be the need by way of the Edge Analytics study and it has then decided to adopt the top of that range plus 5% to take account of its employment and self-containment aspirations.

20. As I made clear in the Hearing sessions, I consider that it would be in all parties' interests that the Council should move forward to having a sound adopted Plan in place at the earliest opportunity. The Core Strategy was submitted for Examination in July 2011 – about 3 ½ years ago. In my opinion the process should now be brought to a conclusion. Further delay would be unacceptable given the uncertainty which has been created in the positive planning of the district, in infrastructure planning and in movement towards developing a Community Infrastructure Levy regime.
21. In my view there would be considerable disadvantages in providing my conclusions on the soundness of Policy CS13 in a letter. A formal Report would give certainty to the status of the housing requirement. If I found the policy to be sound, the Council would have a firm basis on which to proceed to plan for delivery. If I found the policy unsound then the Council would have a clear signal that its whole strategy would need re-assessment. By providing my conclusions in a further letter, the Council could propose additional Main Modifications which would extend the plan-making process and could take it into areas where compatibility with the 'employment-led' strategy of the adopted part of the Core Strategy became increasingly problematic. I am also concerned that, by providing my conclusions in a letter, there would be no formal conclusion on the Policy CS13 housing requirement and any subsequent examination of consequential changes to other remitted policies could be forced to re-consider the Policy CS13 housing requirement if new information had become available. Again the plan-making process could be further delayed and the resources expended on detailed plan provisions could be wasted.
22. I accept that, ideally, it would be best for the Policy CS13 housing requirement to be considered alongside the policies detailing the delivery of the requirement. It is possible that a subsequent examination of the consequential changes to other remitted policies could conclude that there is no sustainable option for delivery of the housing requirement set by Policy CS13. In these circumstances the Council may have to re-assess the Policy CS13 housing requirement and put forward an alternative for examination. However, this seems to be an unlikely prospect. I have seen no evidence to suggest that the MD6/6(a) version of Policy CS13 housing requirement could not be delivered although to do so may involve the Council in some difficult decisions.
23. On receipt of my Report on Policy CS13 it would be for the Council to decide on how it wishes to proceed. This Report should be seen as only partial and, whilst reaching a formal conclusion on Policy CS13, it will provide only part of the route to a sound plan. However, a formal Report on the examination of Policy CS13 will carry significant weight in any subsequent processes.
24. In all of the circumstances I have concluded that I should provide my conclusions on Policy CS13 and its supporting text as a formal Report. To an extent this Report reiterates some of my reasoning and conclusions which were set out in my 22 April letter to the Council. Where necessary I have brought the

arguments up-to-date to address issues arising from the MD6(a) version of the policy and other circumstances which have changed since my March 2014 Hearings. Whilst some may consider this to be somewhat repetitive, I consider that, in the interests of certainty, it is important that the whole of my reasoning and conclusions should be included in a formal Report.

Assessment of Duty to Co-operate

25. The Court judgment made clear that, at the time of the original Examination of the Core Strategy, the 'duty to co-operate' did not apply; the Plan had been formally submitted for Examination before the relevant date set by legislation. The Court's judgement remitted Policy CS13 and the associated policies to the Examination stage of the process i.e. a stage which falls after the formal submission date and, in these circumstances, the Core Strategy remains submitted before the relevant date. In March 2014 some Representors argued that the 'plan preparation' process had been re-engaged by the alterations which the Council had made to the remitted policies. I disagree. The legislation contains a clear dispensation for Plans to be modified after the formal submission date. This is what the Council has done. In these circumstances, I am satisfied that the Council does not need to comply with the 'duty to co-operate' and, provided that the changes which the Council proposes do not fundamentally affect the essential direction of the Core Strategy, there are no sound reasons why the Examination should not proceed.

Assessment of Soundness

Main Issues

26. Having taken account of all of the Representations, written evidence and the discussions which took place at the March 2014 and January 2015 Hearings I have identified the following 4 Main Issues.

Issue 1 - Sustainability Appraisal

27. The originally submitted Core Strategy was supported by a SA which assessed 6 potential housing delivery options ranging from 6,711 to 26,750 dwellings over the Plan period. More recent analysis of the housing requirement undertaken on behalf of the Council (the Edge Analytics study) indicates a 'robust' assessment of need of between 17,130 and 20,220 dwellings over the Plan period. In the light of this, 4 further delivery options were examined by the Council in a supplementary SA. These were the 14,000 figure which the Council originally proposed to adopt and 3 other figures representing the bottom, top and an intermediate point in the range identified in the Edge Analytics study.

28. Taken together the 2 SAs assess 10 housing delivery options. In these circumstances, I am satisfied that an adequate range of options has been assessed. The SA needs to consider the Council's realistic options for delivering its objectives. I am satisfied that the SA is not required to consider options which involve total or partial failure of the Council's strategy.

29. In March 2014 some Representors argued that the publication of the supplementary SA after the publication of the MM1 version of the Policy

indicated that the Council's choice in regard of the Policy CS13 housing requirement was not properly informed by the SA process. Whilst I disagreed with this argument at that time, the supplementary SA documents were available to the Council when it was drawing up the MD6/6(a) modifications and the argument is, therefore, no longer relevant. Given that the housing requirement set out in the MD6/6(a) versions of the Policy is only 5% more than a specific option considered in the supplementary SA, I am satisfied that no separate SA process is required to justify the MD6/6(a) modifications.

30. Some Representors argue that the SA exercises give insufficient weight to the social and economic dimensions of sustainability and that too much weight has been given to the environmental dimensions of the various options appraised. Having examined the SA documents, I can see no clear evidence that the options have been incorrectly assessed.

Issue 2 - Strategic context

31. I have already concluded that the Council does not need to demonstrate that it has satisfied the duty to co-operate. However, this is not to say that the Council does not need to have regard to the strategic context in preparing its Core Strategy. I accept that some uncertainty may have been caused by early announcements by the government that Regional Strategies (RSs) were to be abolished. However, since the introduction of Section 33A into the Planning and Compulsory Purchase Act 2004 at the end of 2011 and the publication of the National Planning Policy Framework (NPPF) in March 2012 it has been clear that the former requirement for the Council to prepare Plans which were in general compliance with the RS was being replaced by a requirement to co-operate with adjacent local planning authorities. At no time has it been open to a Council to prepare a Plan which did not respond to its strategic context.
32. In 2009 the South West Regional Spatial Strategy (SWRSS) 2006-2026 had reached an advanced stage. However, at least so far as the housing requirement is concerned, the Council's Core Strategy does not rely on the draft RSS, its supporting evidence base or on the earlier 2001 Regional Planning Guidance (RPG). I accept that there may be sound reasons for this, not least the fact that this earlier work was based on pre-recession economic forecasts.
33. In its advice on 'Plan-Making', the NPPF advises that Councils should have a clear understanding of housing needs in the area and should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where Housing Market Areas (HMAs) cross administrative boundaries. In 2009, a joint SHMA was undertaken by the Council, Bristol City Council and 4 other local authorities. The Council claims that this was accepted as an important component of the evidence base at the original Core Strategy Examination in 2011/12. However, the 2009 joint SHMA was prepared in the pre-NPPF era and was largely focussed on affordable housing issues. For these reasons, the Council no longer relies upon it. Instead, the Council has undertaken a new assessment of housing need within North Somerset (the Edge Analytics study) which is unrelated to the wider 2009 SHMA conclusions and does not build on that earlier work. This is the evidence which underpins the MD6/6(a) versions of Policy CS13. A review of the SHMA for the West of England is underway but the finalised SHMA will not be available until June 2015.

34. The Council accepts that the Edge Analytics study does not look beyond the Council's own area and does not claim to have assessed the whole of any recognised HMA. Neither Edge Analytics nor the Council claim that the study amounts to a full SHMA. Although the Council is working co-operatively with its neighbours on the production of a joint SHMA and a cross-authority strategic framework, I have seen no clear evidence that any of this co-operative working has informed the preparation of Policy CS13 up to this point. None of the neighbouring authorities is claiming at this stage that North Somerset will need to assist in meeting their own housing needs. However, until the joint SHMA review is complete, the full circumstances surrounding what is clearly a complex HMA cannot be known.
35. In these circumstances, it is difficult to come to any other conclusion than that Policy CS13 has been prepared outside of any clear strategic context which would satisfy the requirements of the NPPF. This would be a serious failing for any Plan but even more so where there is a long-recognised inter-relationship between the housing market of the Plan area and that of an adjacent major city – in this case Bristol.

Issue 3 – Use of Review Process

36. The difficulties I outline above in terms of strategic context are not new nor are they peculiar to North Somerset. In other cases (and most notably in some authorities adjacent to North Somerset which are in the same HMA) issues surrounding the lack of a NPPF-compliant SHMA have been resolved by embedding the need for an early review of the housing requirement into the Plan. The circumstances surrounding each of these cases are different and it is difficult to make direct comparisons of the applicability of such a mechanism on the basis of what has taken place elsewhere. I do not consider therefore that the way in which Inspectors have dealt with these other Plans should necessarily dictate my conclusions in this case. However there clearly needs to be consistency in approach. In these circumstances, I have considered the potential for the use of a similar review device with regard to Policy CS13 as a way of moving forward.
37. The authorities which make up the West of Bristol and Bath HMAs agreed a Memorandum of Understanding in March 2014 to work jointly to produce an up-to-date SHMA. They have also agreed to prepare a Joint Strategic Planning Strategy (JSPS) as a development plan document for the combined administrative areas. This would provide a strategic context for the production of individual Local Plans. The SHMA is scheduled for completion in June 2015 and will inform the preparation of the JSPS. The Regulation 18 pre-commencement document for the JSPS was published in December 2014 and it is expected that the document will be formally adopted by the HMA authorities early in 2017.
38. Some Representors have argued that my Examination of Policy CS13 should await the publication of the joint SHMA in order that the Examination can have the benefit of a NPPF compliant database. I accept that this could be helpful in bringing the information base up-to-date. However, I am mindful that, in cases where the HMA may cover a number of authorities of varied character with complex housing provision relationships, the SHMA would only be a tool to

inform the housing requirements of the authorities involved. The SHMA information will need to be properly interpreted and assessed in order the HMA authorities can develop a co-operative framework which properly apportions the identified housing need between the individual authorities in order that the most sustainable option for the distribution of the housing can be achieved. By itself the SHMA will not do this. It will only answer the question of how much housing is needed, not how that need will be met across the HMA. It would be only when the JSPS has been finalised that the distribution of housing across the HMAs can be firmly established on the basis of the 3 strands of sustainability.

39. Waiting for the SHMA to be published would not, therefore, provide definitive answers to the question of the size of the Council's housing requirement and attempting to predict likely requirements from it could, to some extent, undermine the comprehensive view which the JSPS is seeking to provide. Delaying a decision on the Policy CS13 housing requirement would also hold back the provision of certainty in the plan-making process in North Somerset as the production of the SHMA would almost certainly lead to a further round of examination of Policy CS13. I am satisfied, therefore, that, in the short-term, the advantages which would accrue from waiting for the SHMA to be published would be outweighed by the disadvantages.
40. The MD6(a) version of the text supporting Policy CS13 makes clear that the modified housing requirement is an interim position and that, when the adopted JSPS establishes a new housing requirement for the district in early 2017, the Council will treat the housing requirement of Policy CS13 as having been replaced by the up-to-date development plan policy. Should the JSPS fall behind timetable, the MD6(a) text commits the Council to the production of a replacement version of Policy CS13 based on the up-to-date SHMA and other up-to-date evidence by the end of 2018. I have considered the MD6(a) version on this basis and stress that the interim position provided by the MD6/6(a) version of the policy should be seen only as a 'stepping-stone' towards development of a Plan which is NPPF compliant. To rely on any interim version of Policy CS13 beyond 2018 runs the risk that housing delivery could diverge unacceptably from a properly assessed requirement and provision trajectory.
41. The Council's proposals for an early review of Policy CS13 are compatible in terms of timetable and process with review arrangements which have been become part of the adopted plans elsewhere in the HMAs where reviews are expected to be completed by 2018. Put together, the programme of review will enable the authorities involved to move forward on a co-ordinated basis. Given that the inter-related problems in the local housing markets are unlikely to be resolved by any authority acting alone, I consider that this ability is fundamental to positive and effective planning of the area. In my opinion the commitments made in North Somerset by the MD6(a) version of the policy and text are both firmer and clearer than some made elsewhere. They give greater certainty to the process as it moves forward.
42. In these circumstances I am satisfied that the commitment to an early review of Policy CS13 would be a justified way forward in the absence of a NPPF-compliant evidence base. However, any interim position taken by Policy CS13 should provide a realistic foundation for any future review and should, in itself, be sound and legally compliant. I do not consider that it would be appropriate, even for a short period, to recommend the adoption of a policy which is

essentially unsound and which is likely to require very significant change in the near future. I deal with these issues in more detail below.

Issue 4 - Assessment of the Policy CS13 Housing Requirement

Employment needs/Self containment

43. The National Planning Procedure Guidance (NPPG) advises that trends and forecasts for job creation need to be taken in to account in assessing the need for housing. Adopted Policy CS20 of the Core Strategy seeks to provide 10,100 additional jobs over the Plan period. The Edge Analytics study calculated the dwelling requirement for the 2011-2026 period plus actual completions and the 'jobs-led scenario' 2006-2026. 23,535 houses would be required across the Plan period. Some have argued that the Council's own evidence indicates that a figure of 23,535 should represent the full objectively assessed need for housing in North Somerset. The Council takes a different view and argues that this figure was never intended to represent the full objectively assessed need and that existing and projected improvements in commuting ratios (see below) mean that provision for the 'jobs-led scenario' should not be included in the assessment. Whilst this may be the way in which it considers this matter, I do not agree with the Council on this point. Establishing the full objectively assessed need is only the first stage in establishing the Policy CS13 housing requirement figure. The necessary second stage is to consider this figure against other policies of the Core Strategy, the overall strategy of the document and any constraints which apply in the area. In my view the improvement in commuting rates (if they happen) will derive from the Council's employment-led approach. It should therefore be taken properly into account in the second stage. However, in both cases and irrespective of what approach has been taken this second stage of consideration has led to the MD6/6(a) Policy CS13 housing requirement figure of 20,985 dwellings.
44. Circumstances in North Somerset are unusual. The Council's 'employment-led' approach which is embodied in the objectives of the adopted part of the Core Strategy is specifically directed at addressing a long-perceived problem of out-commuting (to Bristol) and a lack of 'self containment'. This arises from an existing imbalance between jobs and housing, particularly in Weston-Super-Mare. If the Council planned to provide sufficient houses to meet the whole of the anticipated growth in jobs the existing imbalance would simply be stabilised rather than redressed. The choice before the Council is therefore simple: it can either ignore the long-recognised problem of out-commuting and plan to provide houses to meet the whole of the employment target, or it can attempt to address the 'self containment' issue by controlling the provision of housing whilst seeking to increase employment opportunities in North Somerset.
45. The Council points out that the adopted parts of the Core Strategy set no specific target for 'self-containment' improvements and that any improvement would be, therefore, in-line with the underlying objective. I disagree. The Council has calculated that any housing requirement which falls below 26,800 will provide some reduction in the out-commuting rates (as measured as 'self-containment' rates) over the plan period when compared to the 'self-containment' rate of 65% as measured at March 2014. Whilst I understand the argument, I consider that, as a housing requirement approaches 26,800 the impact on 'self-containment' will become increasingly marginal to the point

where the improvement in 'self-containment' is so small that the Core Strategy objective would be, in effect, abandoned.

46. The MD6/6(a) housing requirement would only be sufficient to meet the overall housing need (including that arising from the proposed increase in employment) if out-commuting reduces and 'self-containment' improves over the Plan period. A housing figure at the top of the 'robust' range recommended by the Edge Analytics study is estimated to improve the 'self containment' rate to 71%. The MD6(a) housing requirement is about 5% more than the top of the 'robust' range and would therefore deliver a rate of 'self-containment' which is marginally less than 71%.
47. In my opinion an improvement of about 6% in the 'self-containment' rate which would derive from a housing requirement of circa 21,000 would still be worthwhile and would be compatible with the overall strategy of 'self-containment' in the adopted parts of the Core Strategy. This move towards improvement in 'self-containment' would be experienced in the short interim period before review. At the review stage, the Council would be in a better position to seek to pursue either a lower or higher rate of self-containment in the knowledge of the comprehensive and co-ordinated strategic approach to 'self containment' provided by the JSPS.
48. Paragraph 47 of the NPPF states that the Council should ensure that the Plan meets the full, objectively assessed need for housing 'as far as is consistent with the policies set out in this Framework'. Paragraph 14 of the NPPF requires that the Council should positively seek opportunities to meet the development needs of the area although this may be tempered in circumstances where the adverse impacts of doing so would outweigh the benefits or where specific policies of the NPPF indicate that development should be restricted. One of the core planning principles set out in paragraph 17 of the NPPF is that patterns of growth should be actively managed to make the fullest use of sustainable means of transport. Elsewhere the NPPF stresses the desirability of reducing the need to travel.
49. I consider that it would be imprudent to rely too heavily on uncertain and uncontrollable reductions in out-commuting as a determining factor in establishing a very low housing requirement. I would not normally advocate reliance on such factors to justify a housing requirement which fell below what was needed to support future jobs growth. However, this case is different in that the Council's strategy with regard to the housing/jobs balance is being used to address an existing problem rather than simply as an argument to justify a low housing requirement. Nonetheless, whilst I agree that improvements in 'self-containment' would be a worthwhile objective in sustainability terms, it needs to be carefully balanced against the encouragement of new employment and meeting the reasonable housing needs of the area. If the housing requirement is set too low there is the possibility that the provision of new jobs could be held back and a shortage of housing could occur. In the context of national guidance, I consider that the Council's general approach in respect of balancing jobs and housing to secure greater 'self-containment' is justified. I do not consider that the MD6/6(a) housing requirement is so low that it would unacceptably hold back the delivery of jobs but is not so high that the objective of 'self-containment' is abandoned. In my

view there are sound planning reasons for not seeking to equally match housing provision to the provision of employment in this case.

Alternative assessments of housing need

50. The evidence base which supported the housing requirement in the version of Policy CS13 which the Council originally proposed for adoption included an assessment of need which was based on a jobs:houses multiplier methodology. That methodology has now been abandoned and the housing requirement in the modified versions of the policy are based on what the Council refers to as 'more conventional' trend-based methodologies which are reliant on 'robust data' in the form of Office for National Statistics (ONS), 2011 Census and 2011 Department of Communities and Local Government population and household formation projections. That assessment is set out in the Edge Analytics study undertaken just before the March 2014 Hearings. The study recommends the Council to adopt as a basis for the Policy CS13 housing requirement a figure between 812 and 1018 dwellings per year - these providing 'the most robust and up-to-date evidence for future planning purposes.' Taking into account delivery in the 2006-2011 period, this equates to a requirement of between 17,130 to 20,220 dwellings over the Plan period - referred to as the 'robust' range. This assessment is untrammelled by any policy constraints arising from the adopted parts of the Core Strategy.
51. At the March 2014 Hearings, some Representors considered that the perceived unreliability of these 'more conventional' methodologies indicated that the Council was right to move to less conventional methods. However, national guidance in the NPPF and the more recent NPPG advises that the household projections are statistically robust and based on nationally consistent assumptions. I am satisfied that the Council is right to seek to employ methodologies which more closely align with national guidance.
52. The NPPF gives clear advice on housing provision issues. Paragraph 47 requires Councils to ensure that their Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area so far as is consistent with the policies set out in the Framework. The Edge Analytics study does not claim to be a full, objective assessment of housing needs in a recognised housing market area. It concentrates solely on circumstances in North Somerset and is not informed by data sets from adjacent authorities. However, it is based on, what were at the time, up-to-date national population and household formation statistics and made pragmatic assumptions in their regard. In my 22 April letter I informed the Council that I considered that the Edge Analytics study was, so far as it went, a fundamentally sound piece of work.
53. Some Representors have argued that the Edge Analytics study should now carry less weight as it has become out-of-date and its conclusions have been overtaken by other evidence. It is argued that the study inappropriately makes an allowance for 'unattributable population change' and that recent advice from the ONS advises that no such allowance should be made. The Council is not alone amongst local authorities in disagreeing with this ONS conclusion. The matter of 'unattributable population change' was considered in the Edge Analytics study. The study calculated the effect that discounting the 'unattributable population change' component would have. These are indicated

by the 'Mig-led_10yrs-X' and 'Mig-led_5yrs-X' entries in Table 8 of RED/05. These entries indicate housing requirements which are about 25-45% higher than the top of the 'robust' range identified in the study. Edge Analytics concluded that these should not form part of the 'robust' range as the evidence indicated a 'consistent historical net loss due to international migration'.

54. Representors have also argued that the Edge Analytics study has been overtaken by ONS's publication of Sub-National Population Projections (SNPP) which were not available when the study was carried out. However, the Council has argued that this is only part of the picture which needs to be updated. Finalised up-dated household projection data to accompany the SNPP has not yet been released.
55. A considerable amount of work has been undertaken by some Representors to independently prepare a SHMA for the area covered by the identified HMAs. Whilst I accept that the Representors' SHMA is NPPF compliant in that it covers the whole of the HMA as is required by the NPPF and is based on some more up-to-date information, I do not consider that it takes the debate much further. Both the Edge Analytics study and the Representors' SHMA were compiled in times of substantial economic change and uncertainty which makes reliance on any particular data set problematic. Where different data sets are being used together to form estimates, the difficulties are compounded especially in circumstances where the raw data may be masking underlying trends such as could be the case with household formation rates. In my view particular care is required when relying on such information sets, all of which are, to some degree incomplete.
56. As with any assessment of this type, the outcomes are to a large extent dependent on the assumptions which underpin the work. Any such assessment undertaken could be criticised, especially at times where economic circumstances have been subject of rapid change and long-term trends are more difficult to identify. The Council has criticised various elements of the Representors' SHMA process just as Representors have criticised some assumptions which underlie the Edge Analytics study. In circumstances where the studies have been carried out independently of one another it is extremely difficult to judge which should carry more weight.
57. Putting the Representors' SHMA and the Edge Analytics study outcomes alongside one another, the Representors' SHMA indicates a housing requirement of 28,348 or 1,417 per annum. The MD6(a) version of Policy CS13 provided by the Edge Analytics study contains a housing requirement of 20,985 which equates to 1,049 per annum. The difference is therefore 368 dwellings per annum. If the MD6(a) housing requirement was adopted, it would only be employed for 2 years until the JSPS provides a robust figure based on the joint SHMA information. If at this stage it was shown that the Representors' SHMA housing requirement had been more accurate, a backlog of 736 dwellings would result. The MD6(a) version of the text makes clear that any backlog which arises in this period will be addressed. In my view, if it became necessary, a backlog representing the difference between the Representors' SHMA and the Edge Analytics assessment could be readily addressed in the first few years of the plan period following review. However, the forthcoming SHMA forecasts will only provide assessments of housing need for the period running forward from 2016 and the Council may have some difficulty in extrapolating those

assessments to the years before 2016. Whilst I understand the Council's position, I am not willing to accept that the housing requirement set by the MD6/6(a) version of Policy CS13 is so robust that any assessment of backlog which arises can simply be based on that housing requirement figure. My conclusions in this Report are based on the premise that confident reliance can be placed on neither the Representors' SHMA nor the Edge Analytics assessment. If the Council is arguing that any assessment of backlog at 2016 should be based unreservedly on the MD6/6(a) figure then I would not consider that, in the circumstances, the Policy was sound. In my view the Council should take a pragmatic and realistic view of what degree of backlog has built up in the light of the outcomes of the forthcoming joint SHMAs and the SHMA produced by the Representors and should act to deal with it.

58. Some Representors have argued that setting the Policy CS13 housing requirement at a higher level than that proposed by the Council would do little harm. Others take the view that setting a higher requirement would be more difficult to 'retreat' from if it was found to be too high. There are arguments for and against both positions. However, I consider that there would be harm from setting the housing requirement too high. In such circumstances the Council may be forced to allocate and grant planning permissions on sites which are not the most sustainable options simply in order to meet its duty to provide a 5 year supply of housing land.
59. In these circumstances, whilst I accept that there is some evidence to suggest that the housing requirement set out in the MD6/6(a) version of Policy CS13 may be lower than it should be, I am unwilling to agree that one assessment is likely to be more accurate than the other. The issue will not be resolved until the joint SHMA is produced. Until that time, all assumptions regarding the likely effect of housing need arising from Bristol will remain largely speculative. Given the difficulty in deciding on which information to base the housing requirement, my main concern is to ensure that, whatever housing requirement is decided upon, it should not result in a backlog of provision which cannot be easily recovered in the first few years of the Plan period following review. I will, therefore, continue to base my findings on the Council's proposed MD6/6(a) housing requirement in the knowledge that it will only be in place for a short period before being replaced in the light of a review which is based on a comprehensive, agreed data-set and which allocates housing requirements across the HMAs in a co-ordinated manner.

Dealing with backlogs in provision

60. The MD6 version of the Policy CS13 text indicated that the Council intended that any backlogs in housing provision which have arisen will be accommodated across the whole of the Plan period. The Policy MD6(a) version makes no such statement, the Council arguing that this issue should be considered at the next stage of the re-examination process when consequential changes to policies dealing with the delivery of the housing requirement will be considered. I agree that the issue of how and over what period the backlog is dealt with should be properly considered as part of the trajectory of delivery which would be addressed by other policies. However, the MD6 version of the policy and text which is before me contains this provision and the Council has put arguments before me to support its decision to deal with the backlog over the whole of the plan period and others have put cases before me arguing the opposite. I

therefore need to address the point. The NPPG advises that local authorities should aim to deal with backlogs over the first 5 years of the plan period. I am not persuaded that the Council's arguments before me justify an approach which diverges from clear national guidance. As a general point, should the delivery trajectory for housing include clearing any accrued backlogs over the first few years, the delivery rates in the period up to the adoption of the JSPS and the review of Policy CS13 will be increased above the 1,049 per annum set by the MD6/6(a) housing requirement thereby reducing the potential for significant further backlogs to arise and achieving an additional boost in provision over the short-term. I have no strong grounds for requiring that this matter should be specifically mentioned in the MD6(a) version of the policy and text. I am satisfied that it should be dealt with at a later Examination. If at that time the Council considers that, if backlogs are to be addressed in the first few years, the annual housing requirement would be so high that it could not possibly be met it would need to make that argument to the examining Inspector. However, if, as was originally suggested by the Council in the MD6 version of the Policy, the handling of the backlog was to be mentioned in Policy CS13, I observe that the MD6 approach would not comply with the latest national guidance.

61. In most circumstances I would expect that the existing backlog in housing provision should be calculated from the beginning of the Plan period. In this case that would be 2006. However, the Council's evidence in the Edge Analytics Report only provides projections which run from 2011. Between 2006 and 2011 the Council has been, on average, meeting the housing targets set by other adopted Plans. There is no clear evidence before me to indicate that targets in the 2006-2011 period should have been higher or lower than the targets at which the Council was aiming to deliver. In these circumstances I cannot conclude that a substantial backlog had built up during the 2006-2011 period.

Compliance with paragraph 47 of the NPPF

62. Paragraph 47 of the NPPF makes clear the government's intention to boost significantly the supply of housing. In the MD6/6(a) version of Policy CS13 the Council has chosen to base its housing requirement on the figure at the upper end of the 'robust' range recommended by the Edge Analytics study with an additional 5% to 'boost housing supply and provide a contingency to support the employment-led objective'.
63. Annual housing completion rates in North Somerset have varied considerably over recent years, reflecting buoyancy in the housing market in the 2001-2008 period followed by lower rates of delivery during the more recent recession. On only a handful of occasions since 1990 have annual housing completions exceeded 1,049 – the annual rate of delivery required by the MD6/6(a) version of Policy CS13. I accept that the Council should be planning for recovery from recession. However, given that Policy CS13 has been developed in an uncertain period and that recovery from recession only now appears to be beginning to take place, I consider that – at least in the short term - an annual requirement of 1,049 is not unreasonable. In my view the MD6/6(a) requirement would be a pragmatic but challenging objective until such time as recovery from recession is assured. Framing the housing requirement as a minimum figure enables additional amounts of housing to be delivered. I am satisfied that, in all the

circumstances, the Council's housing requirement would, in the short-term at least, amount to a significant boost in housing supply in North Somerset.

Effectiveness of Policy CS13

64. The likely impacts of deployment of the Council's 'employment-led' strategy need to be approached cautiously. The Council is confident that its strategy will lead to a reduction in the rate of out-commuting but it accepts that it will be a slow process and will only be achievable over the whole of the Plan period. However, given the complexities of the local housing market, changes are difficult to both predict and influence. I have seen no clear evidence to persuade me that the predicted reductions can be achieved. The Council argues that there is evidence that out-commuting rates are already reducing but, depending on which data is employed, others have argued that out-commuting is increasing.
65. In current circumstances, the Council can deploy no measures which would guarantee a reduction in out-commuting. It has no ability to control who buys houses in the district. It has no means of ensuring that houses built in North Somerset would be taken by residents who both live and work in North Somerset. Those with the available resources will be able to out-bid those who do not - whatever their personal circumstances. This could result in those who work in North Somerset being displaced by those who out-commute to Bristol or who are not economically active simply because they have been out-bid.
66. The Edge Analytics study identifies a trend of migration between North Somerset and its immediate neighbours. In the period 2001-2011 this involved a steady rate of in-migration of about 2,000 persons per year into North Somerset, principally from Bristol. It is only through the production of a joint SHMA for the whole of the HMAs that the complex factors which underlie this can be assessed and appropriate strategic responses drawn up. However, I have seen no evidence to suggest that, of its own accord, the trend of in-migration is likely to slow in the near future. On the contrary there are indicators which suggest that, if anything, demand for family housing by those who currently live and work in Bristol is only likely to increase. That demand for housing will need to be met somewhere. Attempts to restrict supply in one place will not, by itself, solve the problem as the demand would simply be diverted elsewhere. The pressure on the housing market will not be abated unless the required houses are provided.
67. I have considerable doubts that the problems of the existing imbalance in housing and jobs and the demand for housing by those prepared to commute to Bristol can be resolved by deploying one measure alone. Any measures to address the issues in isolation could have unwelcome consequential effects. A successful solution is likely therefore to come from a co-ordinated approach by the authorities involved which comprehensively addresses the many facets of the problem. Previous Plans which considered the issue appear to have properly employed strategies which directed both employment and housing development in an effort to address the problem.
68. However, this is not to say that the Council's 'employment-led' strategy would not be part of that solution. In my opinion it would and any attempt to redress the long-recognised existing imbalance between housing and employment in

Weston-Super-Mare is unlikely to be successful without it. Given that it is likely to take some time to show results, I am satisfied that it would be worthwhile to make a start. Having said this, even in the short-term the strategy will need careful monitoring to demonstrate that it is effectively delivering the desired results without causing other problems. In this regard I am particularly concerned that the strategy could give rise to affordability issues. I deal with these matters below.

Affordability issues

69. In my opinion one of the results of an incautious approach to the issue of 'self containment' is likely to be an unwelcome reduction in affordability. There is already a substantial need for affordable housing in North Somerset. Limiting the delivery of market housing development will have a consequential effect on the number of affordable houses which can be delivered. The 2009 SHMA identified an issue of housing affordability in North Somerset. I heard evidence to indicate that the current situation in the district, although worsening, is not significantly different to regional trends. I heard other evidence that affordability problems were increasing when viewed against the national picture. The evidence is conflicting. However, there is certainly no evidence to suggest that affordability is improving in any significant way. I accept that property prices – especially the price of family housing - in Bristol may be increasing at a much faster rate than in North Somerset. This is only likely to increase demand in areas within commuting distance of Bristol.
70. Upward pressure on house prices which would arise from holding back housing delivery in the face of steady or increasing demand could make affordability in North Somerset even worse. In these circumstances, even in the brief period before the JSPS provides a comprehensive solution to the self-containment/out-commuting issues, the Council will need to accurately monitor affordability to ensure that its strategy does not cause affordability to worsen in an unacceptable manner. I have seen no conclusive evidence to suggest that, in this short interim period ahead of the adoption of the JSPS, affordability is likely to change substantially. For this reason I do not consider that, in the short term, the risk of worsening affordability is sufficient to conclude that the Council's employment-led strategy is likely to be ineffective.
71. I have noted the evidence put forward by some Representors that affordability issues reflect other factors in the housing market and are not simply a matter which can be resolved by building more new houses. However, I am not persuaded that housing supply is not, at least, part of the solution and the thrust of national guidance is to boost significantly the delivery of housing to increase supply and address issues of affordability at a national level.

Delivery

72. The Council's '2014 Housing and Economic Land Availability Assessment' identifies a potential supply of land for housing which is more than sufficient to deliver the housing requirement set out in the MD6/6(a) version of Policy CS13. This figure includes an allowance for windfalls which is based largely on historic delivery rates from this source. I have seen no compelling evidence to suggest that 'windfalls' will continue to provide a reliable source of supply into the future. However, the windfall allowance which has been included is relatively

modest and I have no reason to believe that it is wholly unrealistic in the short-term or that it has a significant effect on the overall availability of housing land. Again this is a matter which will need to be addressed in the Examination of any consequential changes to the remitted policies dealing with housing delivery.

73. In March 2014 the Council argued that any housing requirement above about 18,000 could not be physically constructed and marketed within the Plan period and therefore the specification of a higher housing requirement would be 'simply a paper exercise'. However, I heard evidence from the development industry that this was not the case and that there was capacity and desire to build more dwellings if the opportunities existed. This would seem to be supported by the fact that, even during the recession, housing delivery has been maintained to a degree. Average delivery targets of almost 1000 dwellings per year set by the 1996-2011 Structure Plan have been met. Since 2006 – a period which includes both a peak and a decline in house building – between 856 and 990 dwelling completions have been realised in the District. I am satisfied that the housing requirement set out in the MD6/6(a) version of Policy CS13 can be delivered.
74. In these circumstances I consider that the Council should set its housing requirement in the interim period at a pragmatic level. Such a level would prevent the build-up of an unmanageable backlog in delivery if, following a SHMA review, the housing requirement was to rise significantly. It would also enable the Council to take advantage of the opportunity to contribute towards recovery from recession.

Policy CS13 – Overall Conclusions

75. The development of Policy CS13 does not comply with national guidance in that it is not based on a full objective assessment of housing need in the whole of the recognised HMA. However, I am satisfied that, provided that the housing requirement set out in the MD6/6(a) version of the Policy is sufficient, this difficulty can be overcome by embedding a commitment to an early review of the requirement into the Plan. The MD6/6(a) version does this.
76. Within the context of the Council's aspirations to redress the balance between housing and employment (particularly in Weston-Super-Mare) the housing requirement of circa 21,000 set by the MD6/6(a) version of Policy 13 draws an acceptable balance. It provides sufficient housing to meet more than the top of the 'robust' range of housing need identified in the Edge Analytics study but is not so high that the 'employment-led' strategy is abandoned. The requirement is, therefore, compatible with the adopted part of the Core Strategy.
77. Whilst there is some evidence to suggest that the housing requirement is lower than it should be, I do not consider that the other evidence which has been put forward is so persuasive that I should necessarily accept it as an alternative to that provided by the Council. Given that the Council has given a firm commitment to a review of Policy CS13 before the end of 2018, I am satisfied that, if after pragmatic and realistic consideration in the light of the forthcoming joint SHMA, the housing requirement had been set too low, there would be a ready opportunity for the Council to promptly address any real backlog in housing provision which had built up.

Assessment of Legal Compliance

78. My Examination of the compliance of Policy CS13 of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Policy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan is identified within the approved LDS January 2014 which sets out an expected adoption date of July 2014. Whilst the anticipated adoption date has slipped I consider that there are sound reasons for this. The Local Plan's content and timing are generally compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in February 2007 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'Main Modification' changes.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report January 2014 sets out why AA is not necessary in respect of Policy CS13. Detailed assessment of individual sites and locations for development will be carried out at the next stage of the plan preparation process.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the North Somerset Partnership's SCS.
Public Sector Equality Duty (PSED)	The Local Plan complies with the Duty. The Core Strategy was accompanied by an Equalities Impact Assessment at each committee stage.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

79. Policy CS13 as originally submitted has a number of deficiencies in relation to soundness and/or legal compliance for the reasons which I set out above. This means that, in accordance with Section 20(7A) of the 2004 Act, I recommend non-adoption of the policy as originally submitted. These deficiencies have been explored in the Main Issues set out above.

80. The Council has requested that I recommend Main Modifications to make Policy CS13 sound and/or legally compliant and capable of adoption. I conclude that, with the recommended Main Modifications set out in Appendix A, Policy 13 of

the North Somerset Council Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF.

Roland Punshon

INSPECTOR

This Report is accompanied by Appendix A contains the Main Modifications.

Appendix A

Main Modifications to Policy CS13 recommended by the Inspector