

NORTH SOMERSET CORE STRATEGY

EXAMINATION

ISSUES 4a-g

DELIVERY, PROVISION OF INFRASTRUCTURE

ON BEHALF OF

PERSIMMON SPECIAL PROJECTS WESTERN

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Q4a. Delivery - Housing trajectory and whether rates of build are realistic.

- 4a.1 Persimmon Special Projects Western notes the housing trajectory for the plan period, derived from the proposed level of development divided by the plan period (700 dpa), and considers it is sufficiently realistic to deliver the lower overall dwelling provision in the Core Strategy, compared to the higher level of development sought by the emerging Regional Strategy (Proposed Changes) (2008). (1,338 dpa) (RD/02)
- 4a.2 The revised Core Strategy proposes the provision of a minimum of 14,000 dwellings in North Somerset during the plan period 2006 -2026. (Policy CS13 as amended) It is noted, by way of comparison, that the Regional Spatial Strategy Proposed Changes (2008) (RD/02) require the provision of 26,760 additional dwellings in North Somerset during the plan period 2006- 2026. The Core Strategy provision equates to 700 dwellings per annum, whereas the Regional Strategy equates to 1,338 dwellings per annum. Whilst it should be noted that the Regional Strategy figures were proposed by the Secretary of State before the Credit Crunch/Recession and the slower than expected economic recovery, this level of development was considered possible by the EIP Panel and the Secretary of State, despite the previous lower levels of development in North Somerset, derived from the much lower structure plan policy requirements. (993 dwellings per annum 1996 – 2011) Therefore, as the current proposed level of development for North Somerset is now even lower than the adopted Structure Plan (Saved Policy 33), Persimmon consider that over the plan period the proposed level of development should be delivered. However, there will inevitably be some fluctuations in the rate of delivery during the remainder of the plan period, particularly due to the economic recovery and the likely delays bringing forward the sites to be allocated in the Site Allocations DPD or the new style Local Plan.
- 4a.3 It is noted that between April 2006 – March 2011, there have been 4,950 net additional dwellings constructed in North Somerset, an average of 990 dwelling per annum, roughly equating to the Structure Plan target but significantly above the level of development now proposed.(700 dpa)
- 4a.4 To calculate the residual dwelling requirement (2011-2026), completions 2006- 2011 are deducted from the Core Strategy target of 14,000 dwellings. The residual requirement for North Somerset for the remainder of the plan period is 9,050 dwellings. This equates to an average of only 603 dwellings per year (2011-2026)
- 4a.5 It is telling to note that the build rates in North Somerset have kept pace with the structure plan requirements, notwithstanding the recent difficult economic conditions. This evidence suggests that that there is a relatively robust housing market in North Somerset which could readily sustain a higher housing figure.
- 4a.6 Given that the residual housing trajectory for North Somerset is now only 603 dwellings per annum, a figure lower than the lowest level of net completions in the last fifteen years (See Table 4 of Residential Land Survey April 2011) the proposed levels of development are considered achievable during the plan period, if not overly ambitious or particularly challenging.
- 4a.7 Persimmon consider that North Somerset could sustain a much higher level of development, particularly if the relationship to the Greater Bristol housing market is taken into account. Whilst not a matter for this Core Strategy, the Inspector is urged to recommend that a subsequent review (or partial review) of the Core Strategy or the preparation of a new style Local Plan address further the future level of housing

to be planned for in North Somerset, having regard to any issues regarding unmet housing need arising from Bristol City and the relative strength of the local housing market to support a higher level of growth, which would deliver more affordable housing and sustain economic growth and labour supply/mobility in North Somerset.

- 4a.8 In summary, Persimmon consider that the proposed residual housing trajectory in North Somerset is achievable and deliverable, if not particularly ambitious or challenging during the remainder of the plan period, having regard to the implications of the expected slow economic recovery, during the second quarter of the plan period, and past completion rates. The proposed trajectory, whilst not overly challenging, is extremely conservative and thus readily achievable. Sustained delivery at the proposed low level of housing development will inevitably result in problems during the remainder of the plan period, in terms of delivery of affordable housing, access to housing, house prices, economic growth, labour supply and labour mobility, which justifies the need for an early review of the Core Strategy or the preparation of a new style Local Plan. Any such review would need to be prepared in the context of the Localism Act 2011.

Q4b. Deliverability - Land availability within settlements with reference to the revised SHLAA and whether sites listed are achievable.

- 4b.1 Persimmon Special Projects Western, with reference to the revised SHLAA (ED/09) (August 2011) and in terms of the estimated land availability within settlements, notes the Council's position on whether the sites listed are achievable. It is also noted that para 3.185 of the Core Strategy acknowledges that it can not be assumed that all permissions will be implemented. The Core Strategy does not seek to justify its housing provision based solely on the estimated land availability within settlements, to do so would be contrary to the advice in PPS 3 para 33. Therefore, at best, the position in the revised SHLAA can only be regarded as a 'snapshot in time', forming only one part of the Council's overall evidence base.
- 4b.2 Deliverability is a key consideration of national planning policy. [See paras 52, 53, 54 and 57 of PPS3 (2011) (NP/04) and paras 107 – 110 of draft NPPF (ND/07)] Therefore, it is essential that a robust Strategic Housing Land Availability Assessment is prepared for North Somerset, and regularly updated, to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet some of the identified requirement for housing over the plan period.
- 4b.3 A key point to consider is the relationship between Policy CS14 and the proposed Site Allocations DPD, or the new style Local Plan, and the revised SHLAA, in terms of the policy requirements and supply necessary to deliver the proposed scale of development, set out in the Core Strategy. The distribution of the development and its overall scale are determined by Policy CS14. However, it will be the Site Allocations DPD or the new style Local Plan which establishes the level of supply needed to ensure the delivery of the levels of development sought in Policy CS14. Therefore, as the North Somerset SHLAA should be regularly updated, preferably annually, it is likely that a subsequent version of the revised SHLAA will be used to inform the Site Allocations DPD, or new style Local Plan, before it is finally adopted. Thus, the viability of any SHLAA sites, relied upon in terms of their deliverability, is a matter of detail that should be assessed by the Council, and others, through the preparation of the Site Allocations DPD or the new style Local Plan.
- 4b.4 In summary, Persimmon consider that the sites listed in the revised SHLAA, in respect of the estimated land availability within settlements, are not central to the overall soundness of the Core Strategy nor whether the proposed distribution of development, set out in Policy CS14, is appropriate or sound or represents the most suitable option. Persimmon consider that the SHLAA should only help determine the potential housing supply in North Somerset and should not be used to justify the proposed housing requirement.

Q4c. Infrastructure - Projects required to support development.

- 4c.1 Persimmon Special Projects Western note the position of the Council regarding the projects necessary to support development. The Infrastructure Delivery Plan (See ED/12 & ED/12a, b &c) plays a central role to guide the co-ordinated provision of infrastructure in North Somerset and the specific delivery schedules for key areas. (See Policy CS34)
- 4c.2 Persimmon consider that the infrastructure necessary to support individual development proposals should be identified by the Council through the development management process and assessed relative to the overall viability and delivery of the proposed development.
- 4c.3 The draft NPPF (ND/07) states local planning authorities should work with other authorities and providers to assess the quality and capacity of transport, water, energy, telecommunications, utilities, health and social care, waste and flood defence infrastructure and its ability to meet forecast demand. They should also take account of nationally significant infrastructure within their areas. This approach continues existing Government Policy on infrastructure.
- 4c.4 This approach acknowledges the importance placed on co-ordination of infrastructure provision with new development set out in current national policy and is one of the fundamental roles of planning. (See PPS12).
- 4c.5 Given the relatively modest scale of housing development to be provided in North Somerset during the remainder of the plan period to 2026 beyond Weston-super-Mare, having regard to the estimated net capacity, as at April 2011, of those areas beyond Weston-super-Mare, through the Site Allocations DPD or the new style Local Plan, only approximately 2,800 additional dwellings will need to be identified. Therefore, it should be possible for the Council to prepare a revised Infrastructure Delivery Plan to support the Site Allocations DPD or new style Local Plan, which addresses any infrastructure specifically required to support the proposed level and distribution of development, outside of Weston.
- 4c.6 Furthermore, the Council intend to prepare a CIL Charging schedule to be used to seek development contributions to fund new infrastructure, services and facilities. Funds collected could be directed towards the provision of any specific infrastructure required, which can not be secured through the Section 106 planning obligations process.
- 4c.7 In the case of the Weston Villages, the infrastructure required to support the proposed level of development is set out in Policy CS30 and the Weston Villages draft SPD. It will be clarified in the CIL Charging schedule. It is noted that the Council intends to also prepare a detailed delivery schedule for infrastructure at the Weston Villages. Persimmon shall endeavour to work with the Council constructively on the provision and delivery of infrastructure at Winterstoke village.
- 4c.8 In summary, Persimmon consider that the Core Strategy and other documents sufficiently identify those infrastructure projects required and necessary to support the scale and distribution of development, proposed in the Core Strategy.

Q4d. Infrastructure - Timing and Funding of Projects.

- 4d.1 Persimmon Special Projects Western consider that the Core Strategy is sufficiently clear on the expected timing and funding of infrastructure projects to serve the proposed new development, without the Core Strategy containing an excessive level of detail. It is not essential or desirable that the Core Strategy includes details of the timing and funding any infrastructure projects at this stage of plan making. This level of detail is better addressed at the Site Allocations DPD, or new style Local Plan, stage and supplemented by the forthcoming CIL Charging schedule.
- 4d.2 As stated above, the Core Strategy contains sufficient overarching policies to guide the provision of development and associated infrastructure in North Somerset, likely to be required to serve the proposed level of development, which is significantly below the level sought by the emerging Regional Strategy (RD/02) and the adopted Structure Plan.
- 4d.3 The timing, funding and delivery of specific infrastructure to serve particular development proposals can be addressed through the Site Allocations DPD or new style Local Plan or the development management process, subject to the necessary CIL contributions based on the emerging CIL Charging schedule and Section 106 planning obligations.
- 4d.4 In summary, Persimmon consider that the Core Strategy and other documents, including the Infrastructure Delivery Plan, are sufficiently clear on the expected timing, funding and delivery of infrastructure projects to serve the proposed overall level of new development, without the Core Strategy containing an excessive level of detail. The timing funding and delivery of any infrastructure required can be addressed through the Site Allocations DPD, or the new style Local Plan, the CIL Charging schedule and the development management processes.

Q4e. Infrastructure - Community Infrastructure Levy and Section 106 planning obligations.

- 4e.1 Persimmon Special Projects Western consider that the forthcoming Community Infrastructure Levy, once introduced, in combination with the continued use of Section 106 planning obligations, will be sufficient to secure the timely provision of the necessary infrastructure to serve the relatively low level and distribution of development proposed in the Core Strategy during the remainder of the plan period, having regard to the need to assess schemes on a site by site basis and ensure that they remain viable and deliverable. The Core Strategy (Policy CS34) refers to the forthcoming Development Contributions SPD. However, this document has yet to be finalised, although it has been subject to consultation (SD/33). It is understood that the Council is preparing a CIL Charging Schedule, which will supersede the development contributions SPD therefore a minor change to Policy CS34 is required to delete the reference to the development contributions SPD and substitute a reference to the CIL Charging Schedule.
- 4e.2 It is noted that were the Inspector be minded to increase the overall scale and distribution of development to be provided in North Somerset, through the Core Strategy, this may necessitate additional infrastructure requirements, which would need to be clearly identified and tested by the Council and others before the Core Strategy, or the Site Allocations DPD or new style Local Plan, is adopted and/or before such additional schemes could receive planning consent.
- 4e.3 Whilst the details of the North Somerset CIL Charging Schedule and the Infrastructure Delivery Plan are still evolving, particularly relative to the Site Allocations DPD (or the new style Local Plan) and the Council's preferred scale and distribution of development to be set out in the more detailed document, the Core Strategy is sufficiently clear to indicate that development proposals will be expected to provide, or contribute towards the cost of providing, the necessary physical, social and environmental infrastructure directly related to the proposed development. The Core Strategy states that contributions may also be required to meet the management and maintenance of services and facilities. Persimmon considers that the appropriateness of seeking such contributions to cover revenue matters will need to be assessed on their merits on a site by site basis.
- 4e.4 In summary, Persimmon consider that, in combination, the forthcoming Community Infrastructure Levy and the continued use of Section 106 planning obligations, within the context of Policy CS34, will be sufficient to secure the timely provision of infrastructure necessary to serve the proposed limited scale and distribution of development in North Somerset set out in the Core Strategy.

Q4f. Infrastructure - Distinction of infrastructure contributions from residential development and other development contributions.

- 4f.1 Persimmon Special Projects Western note the potential distinctions between purely residential developments and other land uses to be developed. The ability to fund particular infrastructure would be less from other non residential forms of development, as residential developments generally produce better values. However, regard must also be given to the role of comprehensive mixed use urban extensions, such as the Weston Villages, to support and fund the delivery of specific infrastructure. Mixed use schemes, that include a reasonable proportion of residential development, offer the ability to cross subsidize the provision of social and physical infrastructure necessary to serve the particular development but also which would benefit the wider urban area/community. This is particularly the case at the Weston Villages.
- 4f.2 Residential developments generate enhanced land values. It is established practice to seek to extract some of the enhanced value as 'planning gain' to fund infrastructure, that is directly and fairly related to the development, to serve the proposed development, through the Section 106 process, without making the scheme in question unviable. Other developments also require infrastructure to serve them. It is appropriate for the Council to also seek contributions, via planning obligations, from those schemes, subject to viability, towards the social and physical infrastructure required to support the proposed non-residential developments. The council need to acknowledge in the Core Strategy the reduced scope of non-residential schemes to contribute towards infrastructure provision. However, should non-residential proposals wish to raise viability as a justification for not contributing towards specific infrastructure, then the 'Open Book' approach should apply and the merits and composition of the scheme may need to be re-assessed.
- 4f.3 No development will proceed unless it is viable. Therefore, the Council need to remain realistic, in terms of their aspirations in respect of the level of contributions sought, having regard to viability and the relatively low residual values in some parts of North Somerset.
- 4f.4 In summary, Persimmon note the distinction of infrastructure contributions from residential development and other developments. As the viability of each individual development proposal, residential or otherwise, would need to be assessed on its merits, in any event, the Core Strategy sufficiently acknowledges, in paras 5.6 – 5.8 of the Core Strategy, the differences between various forms of development and their ability to fund infrastructure, whilst remaining viable and thus deliverable.

Q4g. Infrastructure - Viability implications of required contributions for proposed development.

- 4g.1 As stated above, the viability of each individual development proposal will need to be assessed on its own merits. If particular schemes in North Somerset are unviable they will simply NOT come forward. Therefore, it is important that the Core Strategy contains sufficient flexibility to enable an assessment of a scheme's overall viability and the infrastructure essential for its delivery, to be carried out on a site by site basis.
- 4g.2 The required contributions are not expressly set out in the Core Strategy for particular developments. It is standard practice not to do so. However, the Council must assess and broadly understand the infrastructure required to serve particular developments and how the costs of any such infrastructure required impact on the overall viability of the developments in question. Clearly, as the Core Strategy does not include any site specific proposals, other than Weston Villages, this is more appropriately addressed through the preparation of the Site Allocations DPD or the new style local plan and the Weston Villages SPD.
- 4g.3 Persimmon welcome the approach of the council to re-assess the level of infrastructure contributions to be sought at Weston Villages and elsewhere at Weston through the CIL Charging Schedule and the Weston Villages SPD.
- 4g.4 In summary, Persimmon consider that the viability implications of the required contributions for the proposed development should be considered in more detail on an individual site basis and through the preparation of the Site Allocations DPD or new style Local Plan and the CIL Charging Schedule. However, for the purposes of assessing the overall soundness of the Core Strategy, Persimmon considers that the Council have sufficiently investigated the viability implications of the required contributions for the proposed level and distribution of development set out in the Core Strategy, including at Weston Villages, through the Weston Villages SPD and the emerging CIL Charging Schedule.