

**North Somerset Core Strategy  
Re-examination of remitted policies**

**North Somerset comments on position statements submitted by participants**

**14 March 2014**

<b>AGENDA 1: Procedural matters</b>		
<b>Issue raised</b>	<b>Respondents</b>	<b>NSC response</b>
<b>Council Proposed Modifications</b>		
Plan period should be 2011-2026.	HBF	There is no scope to amend the plan period given that this is a re-examination of remitted policies and the remainder of the adopted Core Strategy is extant.
Latent demand relates to sources including inward migrants living but not working in NSC and the non-economically active - it is not restricted to financial and economic constraining factors.	HBF	The issue of latent demand as it was characterised during the High Court challenge and subsequently formed the crux of the Judgment was specifically defined as demand for housing unrelated to the creation of jobs. This debate was about concerns raised in respect of the home-jobs multiplier approach which was specifically criticised for assuming all homes would be linked to jobs and that by doing so, insufficient provision would be made for homes unrelated to jobs. The Council maintains that sufficient allowance was made for latent demand in the original methodology, but given the transition to a more conventional approach to deriving the dwelling requirement, the Council has addressed this issue.
NSC do not accept conclusions of the Judge which may have coloured their approach (RED/04 para 86).	Turley	<p>Paragraph 86 of RED/04 refers to a specific element of the Judgment where it is clear that while the Inspector's reasons were 'inadequate', the Judge's conclusion that they were also 'unintelligible' is not supported by the evidence. This is a conclusion derived from cross-referencing the documentary evidence and has not coloured the NSC approach. The more detailed explanation is set out below:</p> <p>In paragraphs 97/101 of the Judgment (OD/02) reference is made to the Inspector's Report reference to the ratio 'falling within a wide range of known homes:jobs ratios</p>

	<p>within the West of England' and appears 'a reasonable compromise'. Furthermore in paragraph 101 the Judge concludes that this 'points strongly to the fact that the Inspector has not understood the evidence'. In paragraph 105 this leads to the Judge's conclusion that the Inspector's reasoning is 'neither adequate nor intelligible'.</p> <p>However there is no evidence to infer from this that the Inspector was referring to the Hardisty Jones Associates Technical Modelling Note as she does in paragraph 103 and therefore the conclusion that he misunderstood the evidence as asserted in paragraph 104 is unsubstantiated.</p> <p>It is clear that the Inspector was in fact referring to the ratios put forward in the NSC Position Paper on Issue 2a (HD/07 paragraphs 6/7). This was in relation to the evidence for the 10.100 jobs and related to 2006 data on the jobs to homes ratios for Bristol, Bath &amp; NE Somerset, South Gloucestershire as well as the West of England and Weston-super-Mare. These were the wide range of 'known' ratios within the WoE that the Inspector had in mind when writing his report.</p> <p>This conclusion follows the logic of the Inspector's narrative. Paragraph 24 of the Inspector's Report introduces the NSC ratio; paragraph 25 refers to criticism of the ratio with particular reference to other areas ('rural North Somerset is unlikely to outperform its urban neighbours of Bristol and Bath...'), the employment-led objective as well as the degree of spare capacity 'with reference to changing population structure and migration, reducing household size and local demand from non-working residents'. Paragraph 26 then concludes that the ratio is appropriate ('a reasonable compromise' when balancing the situation found in adjacent areas and the Core Strategy objectives).</p> <p>There is another convincing reason why the Inspector was not alluding to the Hardisty Jones Technical Modelling Note. This is because the Inspector specifically refers to <u>West of England</u> ratios, whereas the Hardisty Jones data is in respect of <u>North Somerset</u> only.</p> <p>Also in paragraph 103 of the Judgment the Judge states that it is 'unclear what the</p>
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		<p>Inspector meant by ‘known ratios’. However, the ratios in the NSC Position Paper on Issue 2a are <u>known</u> ratios – they are based on evidence of jobs and houses in 2006.</p> <p>It must be remembered that the University was only one party at the examination and the focus of the debate was on the soundness of the Council’s evidence base. The appropriateness of the choice of ratio and the variation between the districts was specifically debated at the hearings. The Inspector clearly had much more evidence before him than was presented in the context of the University of Bristol’s challenge.</p> <p>It is therefore clear that the Judge’s conclusion in paragraph 104 is incorrect – the Inspector was not referring to the Hardisty Jones submission, and this wasn’t the compromise referred to. The Inspector therefore did not misunderstand the University’s evidence (as concluded by the Judge in paragraph 104) and he did not wrongly adopt ‘a figure which lay within a range’ in the Hardisty Jones report.</p>
<b>Impact of Proposed Modifications on overall spatial strategy</b>		
Proposed amendments to CS14 amounts to a new spatial strategy.	Turley	The proposed amendment to CS14 is two fold; it provides a factual update reflecting the passage of time since adoption and offers an indicative distribution for the proposed new requirement, which can be accommodated without changes to the overall spatial strategy. The table at Appendix A of RED/04 has been rebased to an April 2013 position, providing actual completions and commitments data. The residual requirement is then split by area using the spatial distribution of the emerging Sites and Policies Plan allocations (which itself is in accordance with the Core Strategy spatial strategy) and past windfall completions.
<b>AGENDA 2: Strategic context</b>		
<b>Is the Core Strategy prepared within an appropriate strategic context?</b>		
<b>Issue raised</b>	<b>Respondents</b>	<b>NSC response</b>
<b>Application of the Duty to Co-operate</b>		
Remitted policies mean NSC has to start the plan-making process	Gleeson, HBF	Incorrect. Policies have been remitted back to the Planning Inspectorate for re-examination. They are therefore in the examination as opposed to the plan making phase of the process. The Broadland, Norwich and South Norfolk case is different, as

again and so the duty to co-operate does apply (Gleeson); as the plan was submitted after 15 November 2011, the duty to co-operate applies (Broadland, Norwich and South Norfolk CS) (HBF).		detailed in the Inspector's Report: 'The Court Order stated that the remitted parts of the JCS should be treated as only having been taken up to the 2012 Local Planning Regulation 19 <u>publication stage</u> (previously known as the 'pre-submission stage), and as not having been examined or adopted.' (Paragraph 8). North Somerset's High Court Order (OD/04) states 'policies...shall be remitted to the Planning Inspectorate for <u>re-examination</u> and are to be treated as not having been recommended for adoption or adopted.'
No agreement with neighbouring authorities to accommodate displaced migrants as a result of reduced net out-commuting.	NLP, HBF	<p>The NSC approach including the focus on improving relative self-containment at Weston is an agreed strategic objective for delivering more sustainable patterns of growth across the sub-region and is supported by the West of England authorities (WoE Strategic Framework).</p> <p>The EA evidence takes full account of the impacts of migration and the dwelling figure has been derived accordingly. There are therefore no displaced migrants to accommodate in neighbouring areas.</p>
<b>Requirement for a strategic view</b>		
Appropriate strategic context is provided by the draft RSS. NSC Inspector expressed doubts that the plan was prepared in an appropriate strategic context.	Turley	<p>It is not the case that the Core Strategy's strategic context is provided by the draft RSS. While the Core Strategy was prepared in parallel with the emerging draft RSS, the latter document was abandoned before it was adopted. The original examination took into account the evidence base prepared for the draft RSS, but this has now largely been superseded by more up-to-date information. The conclusions in the Inspector's Report (OD/01 paragraphs 29 and 30) emphasised the uncertain economic situation at the time of the original examination and the need for flexibility, not that the strategic context was inappropriate.</p> <p>The NPPG (ID 3-030-20140306) advises that "evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs". This principle would also apply to the draft RSS.</p>
<b>An 'inward looking' plan</b>		
Relationship between homes and jobs needs to	Turley, Barton Willmore	The Council's approach fits with the economic objectives of the West of England and the LEP. The approved SEP (endorsed by LEP Board in principle on 13 March subject to

<p>be addressed over a wider area than just NSC.</p>		<p>minor amendments – published version available end March) identifies a baseline growth of 65,000 jobs 2013 - 2030. <i>“Oxford Economics base line growth projects 65,000 jobs and 2.6% GVA growth to 2030 in the West of England. This is less than our previously stated ambition of 95,000 jobs and 3.4% GVA growth by 2030. We remain ambitious for higher levels of growth than our baseline. This depends in part on the level of government funding in our investment opportunities and the Government working with us to deliver the freedom and flexibilities outlined in section 4.”</i> North Somerset is estimated to account for approximately 13% of the forecast WoE job share which equates to roughly 8,500 jobs – which aligns with the Core Strategy approach (8,500 over 17 years = 500 jobs pa, Core Strategy 10,100 jobs over 20 years = 505 jobs pa.)</p> <p>It should be noted the Open House study submitted by Barton Willmore is based on much higher jobs figures for the West of England (employment-led scenario 1 assumed 94,080 jobs, scenario 2 assumed 135,580 jobs). Re-running the POPGROUP model with the revised job growth target of 65,000 would have a significant downward influence on the dwelling figures across the West of England and North Somerset. In addition, it is not clear what assumptions the Open House study has made regarding the commuting rate. As explained in the North Somerset context this is a key factor which drives the dwelling requirement. If the rate has been maintained over the plan period, this is likely to also significantly overestimate the dwelling figure.</p>
<p>SA report (para 6.10) indicates plan prepared in isolation from neighbouring authorities.</p>	<p>Barton Willmore</p>	<p>RED/09 paragraph 6.10 states that “... the Core Strategy is based on meeting locally arising housing needs and makes no provision for ‘overspill’ from adjoining areas, although the adopted Bristol Core Strategy indicates that the city is planning to accommodate its housing needs within its boundaries”. This phrase is simply intended to indicate that the Council’s approach is based on meeting North Somerset’s objectively assessed needs (which includes migration) but that there is no evidence of, or requirement to make provision for, unmet need from neighbouring authorities. This paragraph should not be construed as implying that the plan has been prepared in isolation.</p>
<p><b>2009 West of England SHMA</b></p>		
<p>2009 SHMA findings on overall need &amp; affordable</p>	<p>NLP, Barton Willmore, Nash</p>	<p>The 2009 SHMA was part of the evidence base for the original Core Strategy which was tested at examination; the outcome of which in respect of affordable housing was</p>

housing not taken into account.		adopted Policy CS16. The Core Strategy Inspector concluded that “the 30% district-wide target of Policy CS16, coupled with the high degree of flexibility in its application, provides a justifiable, pragmatic and potentially effective basis for achieving the maximum viable proportion of affordable housing within new developments” (OD/01 paragraph 83).
<b>Updated SHMA</b>		
Duty to Co-operate Schedule confirms that the four UAs comprise the WoE SHMA area.	NLP	The current WoE SHMA area also includes Mendip and West Wiltshire. The new SHMA will reassess the extent of the SHMA area.
NSC should lead SHMA preparation.	Barton Willmore	The WoE SHMA is a joint exercise, not ‘led’ by a specific authority.
In the absence of a new SHMA it is critical that the EA jobs-led scenario of 1,400 pa is used.	Barton Willmore	Unclear why this should be the case other than a choice of scenario which delivers the most houses. Until the new SHMA evidence has been prepared, it is not appropriate to pre-judge the outcome. In any case, the EA jobs-led scenario is not considered to be robust as it assumes no change to the commuting rate.
NSC should wait for results of new SHMA before preparing remitted policies.	Gleeson	It is wholly inappropriate that NSC is left with a partially adopted Core Strategy. There is an urgent need to establish the housing requirement to plan effectively for sustainable development, deliver the plan’s objectives and to provide certainty, for example, in relation to 5 year supply calculations, provision of infrastructure and service delivery. Failure to re-adopt the remitted policies will impact on the ability to progress the Sites and Policies Plan, CIL and Neighbourhood Plans.
Timetable for the new SHMA has slipped and there is a ‘desire not to produce evidence’ – could be completed sooner.	Turley	The timetable for the SHMA has not slipped, and the programme remains for interim findings by the end of 2014 and final outputs early in 2015 as originally agreed. However, parts of the SHMA work are dependent on dataset releases beyond the Council and the wider SHMA project team’s control, which are subject to their own delays. 2011 Census flow data is required to confirm or redefine the housing market area, and the current release date for this information by ONS is summer 2014. Official CLG 2012 based household projections are expected to be released in November 2014. Both of these datasets will still be incorporated into the SHMA process.
<b>Current co-operative processes</b>		
The fact that an unmet	Gleeson	It is not sound planning to pre-judge the outcome of a new SHMA process. While the

need has not been identified simply reflects the fact that the work is yet to be completed.		development industry is keen to promote the perception that Bristol has unmet needs, this has not been evidenced. There is no unmet need identified in adopted plans or any up-to-date, robust assessments undertaken at the West of England level.
<b>Relationship to a review of the Bristol Core Strategy</b>		
Bristol CS adopted in a different planning context pre-NPPF, localism.	Gleeson, HBF	Circumstances change, but recently adopted plans such as the Bristol Core Strategy need time to be effective and deliver the agreed approach.
Bristol CS is capacity constrained – partly as a result of NSC unwillingness to entertain GB extensions.	HBF	The Bristol Core Strategy is not capacity constrained – Policy BSC5 identifies that both the minimum requirement (26,400) and the proposed delivery target (30,600) can be accommodated within its area. If monitoring shows that planned provision will not be delivered at the levels expected then a longer term contingency is to be considered in the Green Belt in SE Bristol on the Bath and NE Somerset border (up to 800 dwellings). The policy does not identify any such long term contingency for Green Belt land within Bristol adjacent to the North Somerset edge. Bristol City Council has already delivered 51% of their minimum target, just 7 years into the plan period.
Analysis of jobs, migration and housing shows Bristol's policy position leads to greater dependence on in-commuting to service new employment opportunities and drive a return to higher levels of net out-migration – contrary to NSC approach.	Turley	This serves to illustrate the historic context which has led to unsustainable development patterns in the past and which the Core Strategy is seeking to tackle. Notwithstanding this, the economic significance of Bristol is recognised and there will continue to be commuting into the City.  The WoE Strategic Framework seeks to secure a sustainable balance of development across the sub-region. This includes economic growth at priority locations across the WoE including within Bristol and at Weston.
Bristol CS housing requirement of 26,400 could fall substantially below the potential	HBF, Nash	Bristol City Core Strategy was adopted in June 2011. Policy BCS5 refers to the fact that “it is envisaged that 30,600 homes will be provided in Bristol between 2006 and 2026” and that “additional provision which accords with the spatial strategy may be appropriate within the plan period”. In addition, “the minimum target will be 26,400 homes between

<p>housing demands and housing in neighbouring areas will need to increase. No reference to relationship to review of Bristol CS 'to be completed' by 2016 (HBF). Bristol's needs cannot be met within its administrative boundary (Nash).</p>		<p>2006 and 2016. The appropriate number of new homes will be reviewed within 5 years of the adoption of the Core Strategy". There is no indication that Bristol will fail to deliver its required housing requirement (see Bristol City Council note on housing supply RCS-1b) as they have already delivered over half of their plan period minimum target just seven years into the plan period.</p> <p>The new SHMA will provide the evidence to inform the review process. If unmet need is identified in the future then this will need to be assessed in the context of the NPPG requirement that <i>"unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt"</i> (ID 3-034-20140306).</p>
<p><b>Review of plans</b></p>		
<p>All WoE plans are due to be reviewed in 2016.</p>	<p>Turley</p>	<p>Bristol City (June 2011) has a commitment that within 5 years of adoption it will review the appropriate level of new homes (Policy BSC5). South Gloucestershire (December 2013) will undertake a review before the end of 2018 (paragraph 10.10). Bath and NE Somerset Core Strategy is still at examination, but the current intention is to review 5 years after adoption (ie 2019), but with the potential for a partial review in 2016 following the new SHMA. All authorities will need to respond to the outcomes of the new SHMA and the implications as identified through the Joint Planning Strategy.</p>
<p>Need for an early review of the plan based on the findings of the 2015 SHMA. Object to deletion of references to any review.</p>	<p>Turley</p>	<p>If the new SHMA evidence indicates that the plan is out-of-date then a review will be needed. The new SHMA will in any case provide the evidence base for a roll forward the plan period to 2036. Reference to the need to review following the SHMA is included in the North Somerset Local Development Scheme.</p>

### AGENDA 3: Housing requirement

Is the assessment made by the Core Strategy consistent with national policy?  
 Does the selected approach amount to a SHMAA as required by the NPPF?  
 Does the selected methodology provide a full, objective assessment of market and affordable housing in the housing market area as required by the NPPF?

Issue raised	Respondents	NSC response
<b>Self containment objectives</b>		
Objective of improved self-containment is not a soundly based planning strategy.	HBF, Turley	<p>There is a long pedigree of planning documents supporting the approach to improving self-containment (see ED/11 submitted to the original examination): <u>RPG10(RSS) 2001</u> stated in the spatial strategy section for Weston that “substantial residential expansion has taken place over recent decades without an equivalent increase in jobs” that “ease of access to the M5 has led to unsustainable travel patterns with high levels of commuting by car” (paragraph 3.27) and that future investment must be “aiming at greater self-containment” (paragraph 3.28). Policy SS10 included the reference to “limit further housing growth until employment development is more closely in balance with housing”. The <u>Joint Replacement Structure Plan 2002</u> Policy 7 stated that the role of Weston as an employment location and tourist destination would be reinforced and that “<i>requirements for additional dwellings met only where supported by increased local employment and significant improvements to public transport links</i>”.</p> <p>The <u>draft Regional Spatial Strategy 2008</u> stated in paragraphs 4.1.16 - 17 that: “<i>Major housing development has not been accompanied by commensurate employment growth and the imbalance between homes and jobs in the town is such that Weston-super-Mare is the least self-contained SSCT in the region. Job growth in Bristol city centre and at Bristol North Fringe has resulted in significant levels of unsustainable out-commuting from the town with significant congestion impacts on Junction 21 of the M5. The key strategic development issue for Weston-super-Mare is to attract new investment and jobs to the town to address imbalances between employment and housing and the resulting out-commuting flows to Bristol. New development, both in the centre of town and in an urban extension, should be closely linked to job growth so that additional</i></p>

		<p><i>housing is not provided out of step with expansion of the economy and local employment.</i>" The Sustainability Appraisal to the RSS Proposed Changes endorsed a more direct relationship at Weston and criticised the draft RSS Proposed Changes for not emphasising the linkage strongly enough.</p> <p>The <u>Replacement Local Plan</u> (2007) approach was to deliver significant employment development up to 2011 to secure a better job to homes ratio, to be followed post-2011 by the strategic growth of new communities balanced with employment opportunities. This approach reflected the need to improve sustainability and to address the impact of further unchecked residential growth on out commuting. Policy E/1C stated that development at the Weston Regeneration Area would be employment-led. The Replacement Local Plan Inspector recognised the serious imbalance between jobs and homes in the town and recommended an approach to development on mixed use sites that linked through legal agreements the quantum of residential development with the development of employment buildings which would be 'ready for occupation'. In endorsing a linking mechanism, the Inspector made reference to the 1.5 jobs per home ratio.</p> <p>The <u>Core Strategy</u> 2012 contains the extant Policy CS20. The Inspector's Report at paragraph 34 stated that <i>"it is appropriate that this expressly employment-led CS be given a chance to succeed, where previous plans have failed, in the sustainable co-location of new employment and housing in accordance with the essential established principles of the dRSS and RPG10."</i></p>
Self-containment should be assessed at sub-regional level, not NSC (Turley); untenable for NSC to be planning to reverse commuter flows to Bristol (NLP).	Turley, NLP	The need to improve existing imbalances in order to deliver more sustainable development patterns is an accepted strategic planning objective (RPG10, JRSP, RLP and draft RSS) and forms part of the extant Core Strategy approach.
Inconsistency in the way self-containment is currently applied – Weston is more inward	Turley	The relative scale of the imbalance is more pronounced at Weston – as identified in previous plans such as RPG10, Joint Replacement Structure Plan, draft RSS and the NS Core Strategy. The extant policies of the Core Strategy recognise the need for a different emphasis at Weston given the strategic significance of the town and the

looking than the rest of the district		regeneration objectives.
A self-containment strategy must be accompanied by agreement with neighbouring authorities to accommodate unmet needs.	HBF	The NSC strategy of improved relative self-containment has a long pedigree of support in strategic plans and been a consistent objective of the Core Strategy. It is not considered that there will be any unmet needs arising in North Somerset as a result of the proposed strategy. Neighbouring authorities have supported the approach and not raised any objections.
<b>'Full objectively assessed need'</b>		
Objectively assessed needs must be accommodated in full within the NSC area – must take account of past trend level of inward migration	HBF	NSC has identified needs to be accommodated within the North Somerset area. To simply replicate pre-recession trends would not address core objectives of the plan.
Evidence base is not adequate or relevant in terms of demonstrating objectively assessed needs.	NLP, Turley	Identifying objectively assessed needs firstly requires using an up-to-date and proportionate evidence base. This has been provided by the Edge Analytics assessment given the context for the re-examination of the remitted policies provided by the Judgment and in the absence of a new SHMA.
Failure to co-operate with neighbouring authorities – undermines the delivery of 'much needed housing in the Bristol area' (NLP) and 'takes no account of unmet requirements from neighbouring authorities' (BW).	NLP, Barton Willmore	RED/12 sets out the Council's position in respect of the duty to co-operate. No unmet need is identified in either existing development plans or up-to-date robust assessments of sub-regional need. See Bristol City statement on housing needs (RCS- 1b).

17,130 is not an objectively assessed requirement and is constrained by the existing spatial strategy and self-containment objectives.	Barton Willmore, HBF, Nash, Turley, Gladman	The Council's assessment of housing need is objective, based on factual, unbiased evidence. NPPF advises (paragraph 158) that "local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals." The Council has taken an integrated approach and assessed the recommended housing scenarios to secure the best alignment with extant plan objectives.
Not a SHMA because it is based on NSC area and does not take account of affordable housing; no updated assessment of affordable housing undertaken.	Barton Willmore, Nash	It is agreed that the work undertaken is not a new SHMA, but that is not required given the context for the re-examination of remitted policies (see RCS-1, paragraphs 15-18). The affordable housing issue was addressed in the context of the original examination.
Need to consider objective needs over the plan period – not to add on completions 2006-2011 – need to consider any backlog.	HBF	The Edge Analytics analysis covers the period 2011 to 2026. The completions figures for the first five years of the plan period have been added to the Edge scenarios as it would not be appropriate to retrospectively apply a forecast to a time period that has already elapsed. The 4,950 completions (990 pa) 2006-11 reflects the adopted Joint Replacement Structure Plan (1996-2011) and Replacement Local Plan housing requirement (2001-2011) of 993 pa. As completions 2006-11 comprise the first quarter of the current Core Strategy period it would be reasonable to assess this against the originally adopted 14,000 dwelling requirement or 700 pa. On this basis, North Somerset is ahead in terms of housing provision for the plan period with 5,992 dwellings completed 2006-13 against a 'requirement' of 5,124 (700 per annum 2006-2011, and 812 per annum 2011-2013 as the EA base date was 2011). Calculating the requirement and residual requirement this way would result in a lower overall plan period target of 15,680, with 9,688 left to deliver, 745 per annum.
<b>The employment-led approach of the Core Strategy</b>		
Danger of employment-led approach at Weston resulting in housing development having to	Turley	The integrated approach to employment-led development at Weston Villages is on track to deliver the planned objectives, despite weak market conditions (see RCS-1e(i) which sets out progress to date). The evidence is that the approach is succeeding, there are a number of positive interventions taking place and we will continue to monitor its

stop – consequences for bringing forward employment land and 5 year supply.		effectiveness.
Experian evidence is that NSC employment increased by only 30 (net) 2006-2011.	NLP	<p>The job numbers referenced in the NLP submission conflict with other evidence (eg Turley who also reference Experian). Actual counts of jobs are notoriously difficult to provide, particularly at low level geographies. When the final 2011 Census data releases, including travel to work statistics, are available the council will have a definitive count of people working within the district. Various national datasets are available giving indications of employment numbers at local authority level, but these are modelled datasets based on sample surveys. Different datasets inevitably count slightly different things – some statistics on employment will include people who are self employed, others will not. Some datasets are presented as full time equivalent numbers, others are a count of all jobs, irrespective of whether they are full or part time. When counting employees statistics will also vary, as some employees will occupy more than one job. Another limitation of this kind of information is where workers are registered, and if they are correctly allocated to the area within which they are based, or where their headquarters or payroll office is.</p> <p>It is intended that the success of local policy initiatives will be monitored using the suite of indicators agreed by the Joint Delivery Review Board, as reported in the Annual Monitoring Report.</p>
EA jobs-led scenario should be used to inform the housing requirement.	NLP, HBF	Edge Analytics advised (and subsequently confirmed through evidence) that the commuting ratio was not likely to remain static meaning that to apply the jobs-led scenario as presented would not be robust. A more informed application of the jobs-led sensitivity scenarios is appropriate when considering the jobs-led scenario and NSC has shown how these align to the choice of the current trend recommendation.
Must not assume that commuting is unsustainable and a mismatch homes/jobs is a problem.	HBF	It is the relative scale of net car borne commuting and its consequences which have been identified as unsustainable in not just the Core Strategy but in previous plans (RPG10, JRSP, RLP, draft RSS). Commuting will continue to take place, but the plan seeks to create a more sustainable balance between homes and jobs. NPPF (paragraphs 17, 30, 34, 37) supports the transition to a low carbon future, reducing

		congestion and minimising the need to travel, as well as a balance of land uses so as to minimise journey lengths. The creation of a better balance will also have other benefits such as retaining more money in the local economy, improving wage differentials between commuters and local jobs, and providing opportunities for local people – all aspects of the wider regeneration objective.
<b>Details of the Council's methodology for identifying housing needs</b>		
Original CS assumed housing need could be assessed on the basis of the number of new jobs created.	HBF	This is an over-simplification of the original Core Strategy methodology. The original method is explained in the Councils Consultation Statement RED/04.
SA fails to assess higher growth options, and includes highly questionable assumptions about the impact of higher housing numbers, and conclusions suggest little or no weight given to social and economic dimensions.	Barton Willmore	See separate SA response report (RED/09b). Government guidance envisages that some alternatives will be eliminated as the appraisal is refined. The council's evidence is that the higher figures are undeliverable. The guidance also makes clear that SA/SEA provides information to decision-makers; it does not make decisions. Therefore reference to 'weight' is inappropriate. The SA includes equal numbers of environmental, economic and social objectives. Its conclusions reflect the more speculative nature of socio-economic effects.
EA report replaces the previous methodology which is now superseded. Previous methodology applied a rigid homes:jobs ratio which did not take account of underlying need/demand for housing	Turley	The original methodology was robust given the circumstances at the time. However, there has been a transition to a more conventional approach – see the detailed technical response set out in RED/14.

unrelated to a jobs led target.		
<b>Outcome of Edge Analytics assessment</b>		
No justification for how a commuting ratio of 1:1 might be achieved over the plan period.	NLP	A ratio of 1:1 is not being sought. In line with the NPPF NSC are seeking to be aspirational but at the same time realistic in their strategy to address unsustainable land use and travel patterns, but recognise that the fundamental functioning of the sub-region will remain.
Approach to 'other attributable' element of population change is contrary to ONS advice (Aylesbury Vale) (Barton Willmore; ONS consultation raises questions as to how 'unattributable' element of migration is taken into account (Turley).	Barton Willmore, Turley	Assuming that the 2001 Census and the 2011 Census were accurate (and return rates of 95% and 97% suggest they were), then population change in the intervening years must have been related to either births, deaths, internal migration or international migration. The first three are more accurately recorded than the latter, which has been subject to major changes to its estimation methodology over the course of the decade.  The ONS treatment of unattributable population change is unclear and their intention to 'exclude' it from its assumptions does not hold true with the selection of results that EA has seen for the forthcoming 2012-based projections. The approach that EA has taken to evaluating various trend scenarios (including the 'X' varieties) is robust and appropriate.
2011 based headship rates are not an appropriate measure of household formation as they are heavily constrained by recessionary trends.	Barton Willmore; HBF	The Edge Analytics study did not recommend the use of the 2011 based headship rates. See Edge Analytics Supplementary Report (RED/15, page 5).
2010-based figures likely to suffer from same weaknesses that affected 2011-based interim population projections -	NLP	The SNPP-2011 is inappropriately formulated as it combines a 2011 base year population with assumptions that were derived from a population structure that is inconsistent with the 2011 base year (due to the recalibration of the mid-year population estimates). This has produced a range of counter-intuitive projections. The Greater London Authority SHMA provides a useful additional summary of its effects.

flawed unofficial projections should not be preferable to ONS data.		The SNPP-2010 is used as the 'latest' official projection, providing a benchmark against which to compare other forecasts. EA simply adjusted the SNPP-2010 to ensure that its start point is consistent with the actual 2011 population count. The original SNPP-2010 trend continues thereafter, retaining the SNPP-2010 population age-structure. This is a robust and appropriate approach given the real flaws that exist in the ONS 2011-based methodology.
Basis for adjustments to economic activity rates is not explained; should reflect current unemployment rate and anticipate future reductions rather than applying a constant rate.	NLP	These issues are addressed in the Edge Analytics Supplementary Report (RED/15, page 7).
EA comment in error that the commuting ratio indicates there is a net inflow of commuters from surrounding districts.	NLP	Accepted. In paragraph 6.44 of RED/05 this should read 'net outflow'.
Headship rates – rationale for the selection of the average approach has not been justified.	NLP	See Edge Analytics response in RED/15, page 5.
Selected housing requirement based on last 5 years – recession may have suppressed rate of household formation (HBF); 17,130 assumes an unrealistically low level of	HBF	<p>It is usual practice to use past five year trends. In the accompanying statement with population projection data releases ONS state 'projections are trend based, making assumptions about future fertility, mortality and migration levels based on trends in recent estimates, usually over a five-year reference period'.</p> <p>The North Somerset proposed dwelling figure is aligned to a 5 year migration trend (2006-11). This has been criticised as not likely to be representative going forward given that it is based on a recessionary period. However the period in fact was not entirely</p>

<p>net inward migration (HBF); Migration trends too heavily influenced by trends since 2006 – need to use longer term migration trends (Barton Willmore).</p>		<p>based on downturn, the early part of the period saw buoyant migration and even a significant peak in 2010. Residential completions within the 2006-11 period also followed a similar pattern of strong market conditions followed by decline.</p> <p>Using the 10 year trend for migration is less representative in that this includes a more protracted period of strong economic growth and would therefore to a large extent reflect the unsustainable trends that the plan is seeking to address.</p>
<p>Assertion that 17,130 homes and 10,100 jobs will lead to a reduction of 8,321 people out-commuting is not based on any evidence.</p>	<p>Turley</p>	<p>Evidence indicates that over time the level of out-commuting will reduce as the balance between homes and jobs in North Somerset improves. This is logically sound as there is increasing availability of local jobs to meet the needs of local workers and at the same time the relative number of economically active in North Somerset is reducing (relative to the overall population).</p> <p>The interrelationships between the number of workers, and jobs and the prevalence of commuting and self-containment are directly linked. Changes in the last two are directly related to changes in the numbers of workers and jobs. There are wider factors to consider such as earnings, skills and availability of jobs and these also have an influence on commuting and self-containment. The aim is to ensure that the range of jobs broadly available matches the skills, qualifications and aspirations of the local workforce. The NSC approach has considered these issues in the round and considers that the Core Strategy approach is both appropriate and deliverable.</p> <p>The 8,321 reduction is set out in the Council’s Consultation Statement (RED/04 Appendix B page 44). In the table featuring the 17,130 dwelling scenario, the 8,321 reduction in the commuter outflow is calculated by taking the jobs growth for the plan period, and then deducting the increase in in-commuters and the increase in the local workforce. This provides a residual figure for jobs that could influence a reduction in out-commuting by offering local employment opportunities.</p>
<p><b>Flexibility in light of changing circumstances</b></p>		
<p>Housing requirement should be revised upwards to ensure a</p>	<p>Turley, HBF</p>	<p>NPPF paragraph 14 states that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change” but with two explicit caveats. The first is unless “any adverse impacts of so doing would significantly and demonstrably</p>

greater level of flexibility - to take account of a return to more positive economic and market circumstances (Turley); no flexibility built in to respond to unforeseen events or to respond positively to wider opportunities for growth (HBF).		outweigh the benefits, when assessed against the policies in this Framework as a whole". The Core Strategy objectives to address sustainability and regeneration issues are well documented and reflect the wider NPPF policies. The second is unless "specific policies in this Framework indicate development should be restricted" – and where the footnote specifically refers to as an example, 'land designated as Green Belt'. As demonstrated by the 2013 Strategic Housing Land Availability Assessment, a range of sites in accordance with the existing spatial strategy are available. This provides the flexibility needed to respond where allocated sites may not all come forward as planned.
Market signals – affordability ratio has remained consistent since 2004 and considerably above the national average.	Turley	It is correct that the affordability ratio has remained consistent in previous years. NPPG (ID: 2a-020-20140306) explains how plan makers should respond to market signals and is clear that 'a worsening trend...will require upward adjustment to planned housing numbers'. The trend in North Somerset is not worsening, as shown in paper RCS-1c on market signals; the ratio of lower quartile house prices to lower quartile earnings has remained fairly static since 2005 and is comparable to the rest of the housing market area and is lower than the regional average. The evidence presented shows no justification for making any adjustment to overall housing provision within the district.
<b>Range of housing requirement</b>		
No convincing evidence that a higher housing requirement could not be delivered.	Barton Willmore	The council have addressed this point in paragraphs 38-42 of RCS-1 and at the original examination in document HD/01.
Lowest scenario chosen because it results in least change to the plan.	HBF	The recommended housing scenarios were assessed against national guidance and extant policy objectives. The reasons for the choice of the recommended requirement are set out in RED/04.
Commuting rate sensitivity testing does not appear to have informed the housing requirement.	NLP	The sensitivity testing which looked at how changes to the commuting rate affected housing need was a specific part of the Council's consideration (see RED/04).

<p>Market signals – requirement should be increased ‘to help improve relative affordability levels’.</p>	<p>NLP</p>	<p>During the plan period so far, 13% of the 5,992 dwellings completed have been affordable units. The proportion fluctuates each year and the highest delivery years in terms of proportion and amount of affordable provision do not correlate with the highest delivering years overall.</p> <table border="1" data-bbox="792 411 1946 842"> <thead> <tr> <th>Year</th> <th>Total net completions</th> <th>Market dwellings</th> <th>Affordable new build dwellings</th> <th>% of total that are affordable</th> <th>Additional affordable stock*</th> </tr> </thead> <tbody> <tr> <td>2006/07</td> <td>1132</td> <td>1028</td> <td>104</td> <td>9</td> <td>22</td> </tr> <tr> <td>2007/08</td> <td>1474</td> <td>1316</td> <td>158</td> <td>11</td> <td>23</td> </tr> <tr> <td>2008/09</td> <td>935</td> <td>688</td> <td>247</td> <td>26</td> <td>9</td> </tr> <tr> <td>2009/10</td> <td>772</td> <td>683</td> <td>89</td> <td>12</td> <td>60</td> </tr> <tr> <td>2010/11</td> <td>637</td> <td>582</td> <td>55</td> <td>9</td> <td>12</td> </tr> <tr> <td>2011/12</td> <td>515</td> <td>494</td> <td>21</td> <td>4</td> <td>5</td> </tr> <tr> <td>2012/13</td> <td>527</td> <td>411</td> <td>116</td> <td>22</td> <td>22</td> </tr> <tr> <td>TOTAL</td> <td>5992</td> <td>5202</td> <td>790</td> <td>13</td> <td>153</td> </tr> </tbody> </table> <p><i>*Off the shelf purchases of existing stock by affordable housing providers, and conversions/refurbishments of existing market stock.</i></p> <p>Although Policy CS30 seeks to negotiate a target of 30% from sites of 5+ units, in reality a much lower percentage is delivered in relation to completions as a whole. This is not likely to improve given government policy in respect of, for example, assessing S106 viability and the proposal to exclude small sites. Increasing overall housing provision will not necessarily have the effect of improving relative affordability levels.</p>	Year	Total net completions	Market dwellings	Affordable new build dwellings	% of total that are affordable	Additional affordable stock*	2006/07	1132	1028	104	9	22	2007/08	1474	1316	158	11	23	2008/09	935	688	247	26	9	2009/10	772	683	89	12	60	2010/11	637	582	55	9	12	2011/12	515	494	21	4	5	2012/13	527	411	116	22	22	TOTAL	5992	5202	790	13	153
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Any housing requirement up to 26,800 will meet self-containment objective – demonstrates limited flexibility in selected requirement (Turley, Gladman); only higher housing numbers will deliver the job growth sought (Nash, Turley).	Turley, Gladman, Nash	While it is true that any figure less than 26,800 will be less damaging than historic trends, the Core Strategy is seeking to deliver an effective change in overall sustainability to deliver economic and regeneration objectives. The evidence is that 17,130 dwellings will deliver the required job growth.
Use Edge Analytics jobs-led scenario.	HBF; Barton Willmore; NLP	The EA jobs-led scenario does not provide a robust basis for deriving the dwelling requirement because it maintains a fixed commuting ratio. In reality this will change and has changed since 2001. This means that over the plan period the number of workers required to facilitate a given jobs figure will be fewer equating to a need for fewer dwellings.
<b>AGENDA 4: Housing strategy</b>		
<b>Would the Council’s housing strategy be effective in delivering the Plan’s objectives?</b>		
<b>Issue raised</b>	<b>Respondents</b>	<b>NSC response</b>
<b>Current position on housing provision</b>		
Windfall is underestimated.	CPRE	The council has made an assessment of the level of windfall expected to come forward on small sites based on plan period averages so far. Small sites are those with a net dwelling capacity of up to 9 units. Large site windfall (sites with 10 or more residential units) has also made a significant contribution to dwelling completions in past years and could in theory also be allowed for in the supply figures. The Council has taken the pragmatic approach of not including an assumption for large windfall sites, as given that the emerging Sites and Policies Plan proposes new allocations (that otherwise would have come forward as windfall) it may result in double counting of potential supply. This means that actual delivery from windfall is likely to be higher than envisaged. The NPPG (ID: 3-24-20140306) now clearly states that windfall can be considered as a source of

		supply beyond the initial five year period. The NPPG (ID: 3-037-20140306) also now permits counting housing provided for older people, including residential institutions in use class C2, against their housing requirement. North Somerset has a relatively high proportion of care homes, some of which have been completed within the plan period and have not yet been accounted for. These factors will be considered in the context of supply, not in direct relation to what the housing requirement should be.
Use DCLG completions figures.	HBF	CLG live table 253 provides housing completion data, taken from the records of completions as reported to NHBC. No data is presented in this table for the 2009/10 or 2011/12 return years and therefore the HBF is presenting an incomplete picture. Further guidance and caution on the use of the data in table 253 is available at <a href="http://www.opendatacommunities.org">www.opendatacommunities.org</a> . The council's data is an accurate record of net dwelling completions, as it is based on primary surveys.
Completions shortfall 2006/07-2010/11 of 15 dwellings in relation to Structure Plan target – and undersupply of 635 2008/09 – 2010/11 creates pressure for additional housing development.	NLP	The overall structure plan target for North Somerset was 14,900 for the period 1996-2011 and 14,885 dwellings were delivered. It is not appropriate to look at shortfalls in individual years in isolation. NPPG (ID: 3-035-20140306) states that 'the assessment of a local delivery record is likely to be more robust if a longer term view is taken'.
Proposal of 812 pa is less than average 2001-2013 – fails to boost supply significantly; delivery rates have been higher than the annualised 857 pa and no evidence that the development industry cannot deliver 1,148 – 1,298 pa.	Turley	Housing completion rates in the past track the economic cycle and this is expected to continue. Although NPPF para 47 calls for a boost in supply it does not quantify this nor does it state that completion rates everywhere are expected to be higher in the future than they have been in the past. The NPPF also states, at para 173, that plans should be deliverable. Whilst the past 30 year average is 907 units per annum, and between 2001 and 2013 the average stands at 987 per year, only 677 dwellings per year on average have been delivered in the past five years. Given the slow economic recovery, completions will take time to recover, and only 13 years of the plan period remain. In only seven years out of 33 have completions exceeded 1,200.

Market signals – authority has consistently under-provided against historic planned targets.	Turley	North Somerset do not have a record of past under delivery. This has been considered in the context of market signals (see paper RCS-1c).
No clear justification given for level of windfalls at Weston – should be averaged over a longer time period eg 10 years.	Turley	The justification for including a windfall allowance is clearly set out in the council’s hearing statement, RCS-1. The figure of 149 per annum is based on an average of the seven years of the plan period so far, less an element on residential gardens in line with government advice. If the figure were to be calculated using a ten year average instead, a figure of 148 dwellings per year would be arrived at – just 1 unit different to the calculation as presented. The split of windfall between areas is also based on historic rates for the plan period so far.
<b>Revised SHLAA</b>		
NSC has precluded sustainable development options in the GB (Nash); NSC approach is capacity-led (NLP); SHLAA is constrained by policy considerations – does not include GB sites (Turley).	Nash, NLP, Turley	The SHLAA considered housing potential from all sources including the AONB and Green Belt. Total assessed capacity was around 39,000 dwellings, although the majority was discounted through the assessment process This left a residual identified potential on sites which are broadly consistent with the Core Strategy spatial strategy. It has always been the case and confirmed through the National Planning Practice Guidance (2014) that policy (including adopted and emerging development plan) can be used to consider the suitability of sites. “Assessing the suitability of sites or broad locations for development should be guided by - the development plan, emerging plan policy, and national policy” (NPPG ID: 3-019-20140306). If the spatial strategy should change, then this would alter the range of sites which would be considered as identified potential. The SHLAA is used by NSC as an evidence tool to help determine the potential development opportunities available once the housing requirement has been identified. The importance of Green Belt protection remains a key objective of national planning policy (see RED/19 Nick Boles MP letter to Planning Inspectorate 3 March 2014.)
SHLAA indicates potential supply of 19,854 – considerably higher than 17,130 – indicates a lack of ambition.	Turley	The SHLAA is an evidence base that seeks to assess potential opportunities for residential development. It would not be robust to assume all sites would come forward and would be inappropriate to use it as a plan target.

SHLAA caps sites adjacent to settlement boundaries of Service Villages at 30 dwellings – could accommodate more.	Turley	Many of these sites are large tracts of land put forward by landowners/developers. The notional 30 dwelling cap reflects the policy requirement in Policy CS32 to be small scale – in some cases they may be capable of accommodating more subject to more detailed site assessment and community engagement.
<b>Effects of housing strategy</b>		
How is assumed 30% reduction in net out-commuting going to be achieved without working with neighbouring authorities?	NLP	The Council's approach is based on meeting North Somerset's objectively assessed needs (which includes migration) but that there is no evidence of, or requirement to make provision for, unmet need from neighbouring authorities. The Council will continue to work through the LEP and with neighbouring authorities to deliver the agreed strategic sub-regional priorities such as the Junction 21 Enterprise Area as a mechanism for boosting economic growth/increased job opportunities in the area.
Proposed level of housing would not support the level of employment growth envisaged by the CS.	Barton Willmore, Turley	With anticipated changes to the commuting balance the proposed dwellings are sufficient to facilitate the planned jobs growth (RCS-1 paragraphs 54-61).
<b>Effects of proposed approach</b>		
Employment-led approach at Weston is already adversely impacting on housing delivery (Turley); if delivery of jobs fails to come forward, this will be a barrier to housing delivery (Nash).	Turley, Nash	The integrated approach to employment-led development at Weston Villages is on track to deliver the planned objectives, despite weak market conditions. The Joint Position Statement on the delivery and monitoring of employment-led growth at the Weston Villages (ED/25) submitted for the first Core Strategy Examination allowed for a phased approach to delivery in the expectation that time would be needed for infrastructure delivery, site preparation, marketing and for momentum to be gained. The policies are now gaining that momentum and further time is required to allow them to gather pace. RCS-1e(ii) updates on employment-led progress.
NSC cannot measure the effectiveness of the employment-led strategy.	HBF	A suite of monitoring procedures has been agreed through the Joint Delivery and Review Board (set up to oversee the delivery of the employment-led strategy at Weston villages). This has informed the paper on progress RCS-1e(ii). The AMR sets out monitoring information for the whole of Weston and this will be updated annually. The employment-

		<p>led policy is at the early stages of implementation and it is anticipated that progress on the ground and the level of information available will increase as we move forward.</p> <p>This monitoring draws in particular upon planning application information, Council monitoring, business surveys, and investor inquiries in addition to national available data.</p>
<p>Assumptions on commuting ratios are not grounded in reality of the operation of functional economic or housing market geographies – question scope of planning to control this (Turley); no evidence that commuting rate will reduce over time (Turley, NLP).</p>	Turley, NLP	<p>The evidence is that commuting ratios have already improved. The plan has an opportunity to influence the move to a more sustainable development pattern in the future, whilst at the same time reflecting North Somerset’s position within the sub-region. Edge Analytics have provided evidence that the rate has already changed (RED/15).</p>
<p>Housebuilding will create employment – construction and retail/service jobs.</p>	Turley	<p>If this was true there wouldn’t be a problem at Weston, which has seen substantial housebuilding over the past three decades. Turley’s clients, Persimmon, have demonstrated a commitment to the principle of employment-led at Weston through their engagement at Weston Villages. It is accepted that new dwellings (or more accurately increased population), has a direct relationship to an increase in demand for services and products. In many cases the jobs from this will be established within the local economy. Construction jobs are however very different - they tend to be transient and not necessarily rooted in the local economy.</p>
<p>Being so close to the City of Bristol, NS should not try to reverse out-commuting, and pursue a strategy of self-containment.</p>	HBF; Persimmon	<p>NSC recognise the functional relationship with Bristol and appreciate commuting will remain a characteristic feature. However it has long been recognised and incorporated into successive policy that this relationship needs to be addressed. The planning system has a key role to play in addressing high levels of car based commuting and planning for development that is more sustainable.</p>
<p>In order to limit out-</p>	Gladman	<p>It is agreed that the quality of jobs is of significant importance to addressing out-</p>

<p>commuting the quality of jobs delivered will be important.</p>		<p>commuting but also the overall quantity of jobs available will be a key factor. Ensuring that there is a sufficient range of jobs available is a key part of the strategy. NS already benefits from a range of high quality jobs and efforts are in place to further increase the quality of job offer (e.g. focus on skills, training, promotion of priority sectors, and enabling actions to establish new business growth).</p>
<p>Policy CS20 in addition to remitted policy CS30 will need to be reviewed and revised to relax employment-led approach at Weston.</p>	<p>Turley</p>	<p>Policy CS20 is an extant adopted Core Strategy policy and cannot be changed in the context of the re-examination of remitted policies.</p> <p>In any case, delivery of the policy is beginning to gain momentum and NSC does not accept that change is required.</p>
<p>It is 'accepted' that a significantly revised housing strategy would require the release of GB land.</p>	<p>Turley</p>	<p>Accepted by whom? Depending on the quantum of housing required there are a number of alternative spatial scenarios which would be investigated, and not necessarily requiring Green Belt sites. Green Belt protection remains a significant national policy consideration – see Nick Boles letter (RED/19).</p>
<p>1.5 jobs per dwelling requirement is a blunt policy instrument which will not deliver self-containment. This is preventing housebuilders from delivering housing and will lead to 5 year supply problems.</p>	<p>Turley</p>	<p>The approach is set out in extant Policy CS20 with the objective of securing a relative improvement in self-containment. More detailed delivery mechanisms have been agreed through the Joint Delivery &amp; Review Board. Existing housebuilders, including Persimmon have secured permissions and are either delivering, or well on course to deliver, houses, jobs and infrastructure (see RCS-1e(ii)).</p>
<p>Demand from non-economically active inward migrants will continue and needs to be taken into account – rising prices may restrict economically-active</p>	<p>Turley</p>	<p>This has been taken into account through the application of the POPGROUP cohort model.</p>

migrants and force younger economically active away from the area.		
If full objectively assessed needs are not met locally, then this need will be displaced elsewhere with social/family impacts, unsustainable travel and stifled economic growth.	Turley	The Council's approach is to meet the objectively assessed needs within the district. It should not be assumed that the migration trends that prevailed over the 10 year period (2001-2011) will continue going forward, namely extensive in-migration from Bristol and South Gloucestershire. It is evident that this historic trend has influenced unsustainable travel and land use patterns contrary to NPPF advice. Nevertheless it should be recognised that the large majority of the housing provision proposed in the plan is to meet the needs of migrants as opposed to indigenous household growth. Importantly this is a coordinated strategy with economic and employment growth to ensure there are opportunities for more sustainable development in North Somerset.