

Agenda 4 - Housing Strategy Additional Statement

North Somerset Core
Strategy; Examination of
Remitted Policies. Turley
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(Severn Valley) Ltd

Persimmon Homes
(Severn Valley) Ltd

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Q: Would the Council's housing strategy be effective in delivering the Plan's objectives

- 1.1 The suggested delivery of 17,130 dwellings over the plan period would not meet Objective 1, which fundamentally seeks to meet the housing needs of North Somerset. As stated in our previous representations the objectively assessed housing need for North Somerset falls within the range of 22,950-25,950 for the Plan period of 2006-2026. Therefore the proposed housing requirement of 17,130 would fall far short of meeting the housing needs of the District. As a consequence the housing strategy needs to be revisited to deliver a level of growth which is consistent with the needs identified by its own evidence base.
- 1.2 Neither will the housing strategy be effective in delivering Objectives 3 and 5, which seek to prioritise employment growth throughout North Somerset to support greater self-containment. The evidence base demonstrates that only a higher housing requirement will meet the employment growth sought.
- 1.3 As highlighted in our previous representations and in particularly our 'Evidence Based Critique of the Proposed Revised Housing Requirement for North Somerset' the proposed level of housing planned will not deliver the employment strategy and target. Without sufficient housing to meet local needs and a range and quality to attract new economically active persons to the area, employment will not be attracted. This in turn will hinder the ability for North Somerset to meet their aspiration of greater self-containment. Edge Analytics modelling demonstrates that the Council's proposed level of housing will only support 915 additional jobs over the plan period in comparison to the target of 10,100 jobs.
- 1.4 The Inspector should give consideration to the fact that the housing provision at Weston-super-Mare is being constrained by the 1.5 jobs per dwelling requirement (as set out under CS20 and CS30). The housing strategy will not be effective at delivering Objective 3 and 5 if this continues. This constraint on delivery is currently being experienced by our client (Persimmon Homes) at Weston Villages. If North Somerset is to rely on Weston-super-Mare as being the focus for strategic development and deliver much needed housing then the delivery of housing should not be artificially constrained to ensure that the planned housing growth at Weston-super-Mare, particularly Weston Villages, is delivered in a timely way. Therefore Policy CS20 in addition to re-mitted Policy CS30 would also need to be reviewed and revised.
- 1.5 As stated above the housing requirement figure should be significantly increased to reflect the objectively assessed housing need and consequently the housing strategy revisited to deliver this level of growth. It is accepted that such a revised housing strategy would also require the release of Green Belt land. Therefore this would not meet the aspirations of Objective 7 which seeks to retain the existing Green Belt but this Objective is not in accordance with the NPPF presumption in favour of sustainable development given that many sustainable development options are currently in the Green Belt.
- 1.6 Summary comments are set out below in response to headings set out by the Inspector in the Hearing Agenda.

Current position on housing provision

Delivery Rates

- 1.7 The average completion rate between 2001/02-2012/13 was 987 dwellings per annum. This period is more realistic and representative of the varying economy and its impact i.e. it includes a period of economic growth, recessionary period, and a post-recession period. In individual years build rates in North Somerset have historically achieved in excess of 1,000 per annum (7 times in the past 20 years).
- 1.8 The proposed housing requirement (17,130) would require an annualised rate of 857 dwelling per annum over the 20 year period. Whereas, historically the District has been able to deliver a much higher rate. Development levels significantly below the recent long term build rate do not deliver the significant boost in the supply of housing required by government policy.
- 1.9 As detailed in our previous representations we consider the housing requirement should be higher than that proposed with consequently a higher annualised rate. There is no evidence to suggest that a higher annualised range of between 1,148 and 1,298 dwellings per annum (based on an overall requirement between 22,950-25,950) could not be delivered by the industry.

Justification for windfall allowance

- 1.10 No proper or clear justification has been given for the level of windfalls expected at Weston-super-Mare. The remainder windfall levels, at other locations have used an average from the past 7 years (the plan period so far). It is argued that this does not give a truly representative figure and should be averaged over a longer period of time, for example at least 10 years.

Revised SHLAA

District Capacity and influence on housing requirement

- 1.11 The Council openly accept within the Sustainability Assessment Report that the SHLAA is not comprehensive and only illustrates a range of opportunities which could be assessed, along with other sites, should additional housing be required as part of the plan making process.
- 1.12 A SHLAA is clearly a starting point for identifying potential housing sites to contribute towards the increased housing requirement during the Plan period. However, both the 2011 and 2013 SHLAA's were both subject to the application of a spatial policy constraining overview. With the Council's evidence base demonstrating an objectively assessed housing need significantly higher than proposed there is a need to now identify sustainable Green Belt releases in order to meet the housing need during the Plan period. In this context, it is our view that given the subsequent need for Green Belt release there is inevitably a far greater potential supply of sustainable deliverable sites than the Council imply as such sites have previously been discounted through the SHLAA process.
- 1.13 Sites adjacent to settlement boundaries of Service Villages are capped in the SHLAA at a notional 30 dwellings. This is not truly reflective of their potential as there is no reason to apply such an notional cap. Many of these sites will have the potential to deliver more housing.

Effects of Housing Strategy

Evidence of effects on self-containment

- 1.14 North Somerset Council use an assumption that existing commuting flows will reverse. Despite the reliance on this assumption to support the policy position the Council has presented no evidence to substantiate this assertion that commuting flows can be reversed. Furthermore, it is our view that commuting patterns cannot be directly controlled by a single LPA, particularly in areas such as North Somerset which functions as part of a much wider, sub-regional housing and labour market centred on Bristol.
- 1.15 Our critique of the Edge Analytics evidence base highlights the difficulties in assuming that significant change in commuting patterns can be achieved through policy intervention, particularly when taking account of other planned economic investment in the wider area.
- 1.16 Already the effects of the adopted policies which seek to increase self-containment are impacting on much needed housing delivery. The 1.5 jobs/home requirement at Weston-super-Mare and particularly Weston Villages is constraining the delivery of much needed housing and could be seen as a deterrent for commercial developers seeking to invest in Weston-super-Mare. As a consequence this policy restraint comprises both the delivery of housing and employment provision. In turn this is preventing the Council from maintaining a five year housing land supply.

Achievement of objective of self-containment

- 1.17 There is no certainty that an employment led approach will result in people living and working in the same location. In that respect the 1.5 jobs per dwelling requirement is a blunt policy instrument which will not deliver self-containment.
- 1.18 Furthermore there is no reliable way of measuring the effectiveness of such strategy to see if an objective of self-containment is a realistic goal.
- 1.19 There is concern regarding the 1.5 jobs per dwelling requirement and the impact this is having on housing delivery cannot be under-estimated. House builders are ready and willing to deliver housing but the delivery of 1.5 jobs per dwellings is preventing the much needed houses from being delivered. If this continues North Somerset will not be able maintain a five year housing land supply nor achieve the economic investment sought.
- 1.20 The first annual monitoring report for Weston Villages has been prepared by the Council and this is attached as Appendix 1. The anticipated trajectory for dwelling completions is shown to be slow at the beginning of the period, with an expectation that over 500 dwelling per year will be delivered between 2018 and 2026, to meet the housing requirement for the plan period.
- 1.21 This trajectory will be significantly impacted upon by the 1.5 jobs per dwelling policy restraint which is preventing house builders who are ready, willing and able to deliver houses. The Council cannot afford to allow the housing delivery to slip at Weston Villages as they are relying on it heavily to deliver a significant proportion (5,500 dwellings) of the much needed housing for the district as a whole. Any drop in delivery over the next couple of years will consequently increase the required annualised completion rates to over 700 dwellings per annum in the latter part of the plan period, which would ultimately decrease the certainty of delivering the housing requirement and meeting the

plans objectives. In addition the Council will struggle to maintain a five year housing land supply which will undermine the Plan and the housing strategy as a whole.

- 1.22 The delivery of housing should not be artificially constrained. The Council should re-consider the jobs to dwelling ratio policy constraint on Weston Villages to help meet the housing needs of the District, increase the economically active population and as a consequence attract employment to the area. Without delivering housing first, at a steady rate that will attract employment this would lead to further residents out-commuting and moving away from the District which would conflict with the objective of increasing self-containment.
- 1.23 This first Weston Villages annual monitoring report fails to detail the delivery of jobs to date and the anticipated jobs trajectory to demonstrate the relationship between homes and jobs.

Effects of proposed approach

Out-commuting

- 1.24 As highlighted by the Local Plan Inspector considering the Sedgemoor Local Plan there is no certainty that the planned interrelationship between jobs and housing will result in people living and working in the same location. It may result in a greater proportion of people in-commuting with little or no reduction or even an increase in out-commuting if employment creation increases in a neighbouring authority.
- 1.25 The Council suggest that based on the proposed provision of 17,130 home and 10,100 new jobs there will be a reduction of 8,321 people out-commuting over the plan period. This is not based on any evidence. As noted in our 'Evidence Based Critique of the Proposed Revised Housing Requirement for North Somerset' this would have a potentially fundamental impact on the wider housing market, potentially impacting on the ability of other economic centres to grow.

In migration of the non-economically active

The in-migration of non-economically active people is something which is likely to continue given the attraction of the South West for those of retirement age. Therefore a level of demand from inward migrants that are non-economically active needs to be accounted for in order to respond to an on-going situation. If not, then a reduced level of housing will increase house prices to a level which will 'price out' the local population.

House Prices/Affordability

- 1.26 As stated in the 2009 SHMA a greater housing supply will be needed to moderate affordability pressures. An employment-led strategy without meeting the full objectively assessed housing needs of an area (which is currently being proposed) will only be counterproductive in that if housing supply is constrained then house prices will increase and prevent both the economically active from relocating into an area for employment purposes and at the same time force the younger economically active out of an area as they cannot afford to live locally. Suppressing housing need will also force people to live further away from where they work. A consequence of this would be an increasing ageing uneconomically active population living in the District counterproductive to the Plan's economic objectives.

Attracting employment/economic growth

- 1.27 The housing strategy will not successfully attract employment if there is not sufficient housing to meet all local needs and sufficient range and quality, to attract new economically active households into the area. Suppressing housing needs will also suppress economic activity.
- 1.28 As noted in our earlier representations there is an inconsistency between the level of jobs being planned for in the adopted policies of the Core Strategy and the size of the resident labour force. Edge Analytics modelling demonstrates that the Council's proposed level of housing will only support 915 additional jobs over the Plan period, instead of the 10,100 target.

Displacement of unmet demand

- 1.29 If the full objectively assessed needs are not met locally within the District, then inevitably the unmet need will be displaced elsewhere in the region or even beyond. The overall implication of this is that family and social network become disjointed; patterns of unsustainable travelling/commuting increase and, overall economic growth is stifled.

Appendix 1

AREA POLICIES

Weston Villages

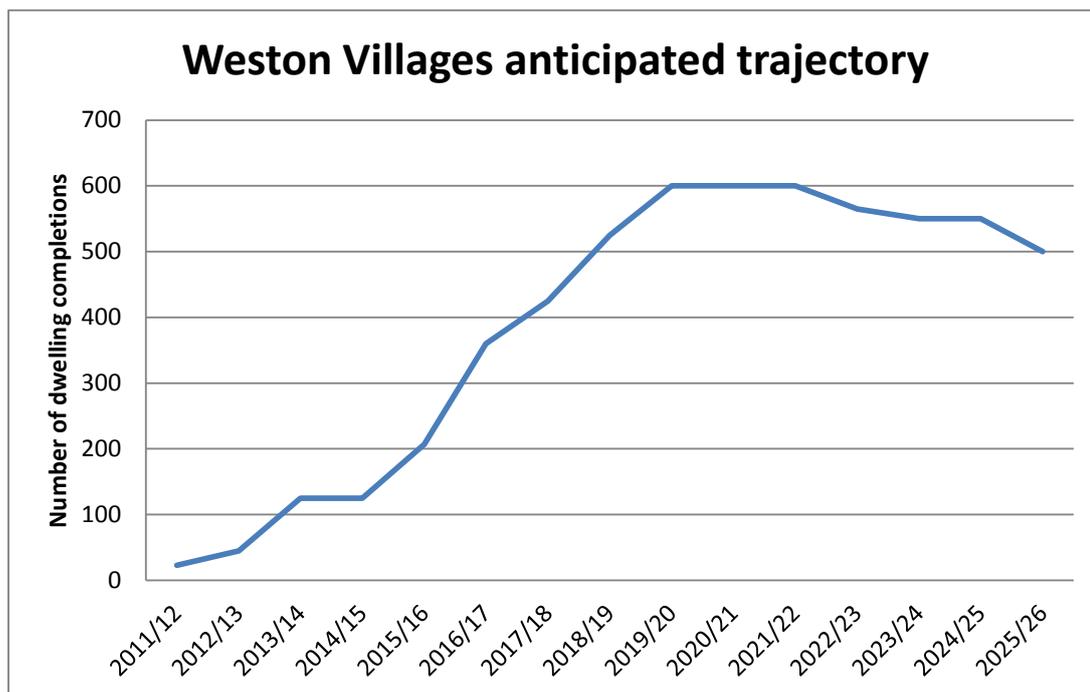
Monitoring and review processes to assess delivery of jobs and homes at the Weston Villages development have been agreed with the developers involved at the Joint Delivery Review Board.

This is the first annual report on the Weston Villages development and as such contains limited information, as only the early phases had begun construction during the monitoring period. As development accelerates it is anticipated that these reports will become more detailed.

Total number of jobs and homes delivered at Weston Villages

Between 1 April 2012 and 31 March 2013 there were 68 dwelling completions recorded on the first phase of Locking Parklands. Work is continuing on both phases 1 and 2 (250 dwellings in total) and the first employment space was completed, a speculative office development. On Winterstoke Village the first employment development 'The Hive' is nearly complete, and outline approval has been secured for the first 900 units, of which 270 dwellings now have their reserved matters consent.

The trajectory chart below shows the anticipated rate of delivery for the 5,800 total dwellings at Weston Villages over the plan period.



Types of jobs delivered

In future years job gain figures will be presented, by use class or other appropriate breakdown. These will be delivered in line with the housing as part of the employment led delivery of the overall site.

Construction apprenticeships delivered

During the monitoring period 4 construction apprenticeships have been taken up by North Somerset residents on the Locking Parklands build programme, all as sub-contract apprentices. The trades that these apprenticeships are in are electrical, brick-laying, carpentry and plumbing.

Local economy

On the Locking Parklands first phases, 7 local based contractors have succeeded in securing work. The labour force currently consists of in excess of fifty people daily, across fourteen trades. Approximately 40% of the current workforce are residents of North Somerset.

Employment land availability

The Weston Villages Supplementary Planning Document set out the masterplan for the site and indicative boundaries for parcels of land for various uses. As detailed planning consents are granted, detailed employment land figures will be presented.

Impact of employment led policy on the rest of North Somerset

In future years employment and housing completions will be presented for Weston Villages compared to the district as a whole to assess any positive or negative trends.

Details of marketing and promotional strategies

Details of employment sites and business opportunities across North Somerset (and in particular at J21EA) are promoted by the Economic Development Service through a range of activities including:

- the business focused website www.innorthsomerset.co.uk (includes site profiles, town profiles, news items, J21EA zone and the Business Directory);
- twitter (@innorthsomerset) and linkedin
- various editorials and advertisements in property press and general media
- Business events throughout the year
- Production of brochures and leaflets (including the North Somerset brochure, Weston brochure, simplified planning and Westonworks employment support).
- the business lounge at the Town Hall (which includes the display of property particulars and maps)
- contact with businesses and site tours.

Joint working

In addition to the council's own marketing and promotional activities, a number of the developers have contributed to the joint marketing of the area. This joint promotional work includes advertisements and editorials (in both local and regional press and via a PR agency for national coverage), attendance at events, production of brochures and general marketing activities. The Economic Development Service also supports and uses a sub-regional online property database to list and promote available commercial premises across the area. This is available to view at www.innorthsomerset.co.uk and is supported by the West of England Inward Investment Service.

Infrastructure delivery

Progress on strategic infrastructure delivery during 2012 – 2013 has included:

- Award of contract for the £15m Weston Package major transport scheme, with work starting in April 2013. The scheme will deliver significant improvements to capacity at the M5 Junction 21 as well as improved bus and cycle routes throughout the town and a new car park and bus interchange at Worle railway station.
- Planning consent granted for the “Superpond” elements of the Weston Villages Strategic Flood Solution. Work to deliver the scheme is expected to take place from Autumn 2013 – Spring 2015. A further application to increase the capacity of the River Banwell was withdrawn for technical reasons, it is expected to be revised and resubmitted in 2014.
- The Cabot Learning Federation was selected as the preferred operator of the first primary school to be built at Winterstoke Village. This decision was confirmed by government in May 2013 with the school expected to open in 2017. For older students, a successful bid was submitted to government for a “North Somerset Enterprise and Technology College” (NSETC), due to open in September 2015.
- The conclusion of S106 negotiations for the first phase residential development at Winterstoke Village (application reference 10/P/0756/OT2) and the second phase residential at Locking Parklands (application reference 12/P/0760/F). Together these secured a range of infrastructure including delivery of primary school places, flood mitigation, public open space and built community facilities, as well as the phasing of employment-led requirements.

Details of planning applications approved, submitted and expected

The tables below summarise the main planning applications submitted to date for the Weston Villages. Milestones reached during the period from April 2012 – March 2013 are highlighted in yellow (the highlighting of an application reference number signifies that the application was submitted during this year). The list excludes applications relating to Environmental Impact Assessments, non-material amendments, advertisements and S106 modifications.

Particular progress was made at Winterstoke Village, where work on infrastructure and access for the 17ha Weston Park Business Quarter commenced. Outline planning consent was granted for the phase 1 residential development at this site including up to 900 dwellings and Reserved Matters consent for the North Somerset Enterprise Agency managed workspace scheme, which will provide flexible workspace and on-site business support for new and growing businesses. An outline application for the remainder of the site including up to 1,650 dwellings and 3.8ha employment was submitted.

At Parklands Village, work continued on the Phase 1 Locking Parklands development (application ref 09/P/1614/F) including construction of 600sqm BREEAM Excellent office space; and permission was granted for another 150 homes. A ‘masterplan’ application by Mead Realisations for the northern and eastern areas of the village was submitted including up to 1,150 dwellings, 20,000sqm employment; a care home & close care units; hotel; veterinary practice; 200sqm retail; and a range of community facilities.

Winterstoke Village

Applicant	Application ref	Application type	Brief description	Application status	Start on site
Persimmon	07/P/1950/O	Outline	"Business Quarter" including 17ha B1 use class, hotel, public house / restaurant and crèche.	Permission granted 09/12/09.	September 2012
Persimmon Homes	10/P/1766/RM	Reserved Matters	Business Quarter access and servicing.	Permission granted 06/01/11.	September 2012.
North Somerset Enterprise Agency	10/P/1277/RM	Reserved Matters	3,740sqm managed workspace scheme with on-site business support.	Permission granted 18/10/2012.	May 2013.
Persimmon Homes	10/P/0756/OT2	Outline	Mixed-use including up to 900 dwellings; local centre and primary school.	Permission granted 13/08/2012.	November 2013.
Marston's Inns and Taverns	11/P/1632/RM	Reserved Matters.	Public house / restaurant and hotel.	Permission granted 05/12/11.	Expected early 2014.
North Somerset Council	12/P/1884/F2	Full	Strategic Flood Solution: "superpond" on and to the south of Winterstoke Village.	Permission granted 14/02/13.	Nov 2013 (Persimmon phase 1).
Persimmon Homes	12/P/1510/OT2	Outline	Mixed-use including 1650 dwellings; 3.8ha employment; primary school.	Determination expected early 2014	TBC
Persimmon Severn Valley	13/P/0244/RM	Reserved Matters	Phase 1 Strategic Flood Solution ('superpond').	Permission granted 08/11/13	November 2013.
Persimmon Severn Valley	13/P/0834/RM	Reserved Matters	Phase 1 residential (269 dwellings).	Permission granted 08/11/13	December 2013.

Parklands Village

Applicant	Application number	Application type	Brief description	Status	Start on site
HCA / St. Modwen	09/P/1614/F	Full	Mixed-use including 3,195 sqm Innovation Centre; 2,024 sqm office and 100 dwellings.	Permission granted 31/03/10.	Start on site Feb 2011. Housing & office completed April 2013.
HCA / St. Modwen	11/P/0926/F	Full	Additional access from Locking Moor Road (A371) to 'Leisuredome' plot.	Permission granted 04/08/11.	Expected 2014 / 2015.
Leisuredome (UK) Ltd.	11/P/0923/F2	Full	'Leisuredome' extreme sports facility.	Approved by committee 21/07/2011; S106 pending.	TBC.
HCA / St. Modwen	12/P/0760/F	Full	150 dwellings.	Permission granted 19/11/12.	May 2013.
Mead Realisations	12/P/1266/OT2	Outline	Mixed use "masterplan" application including up to 1,150 dwellings; 20,000sqm employment; care home & close care units; hotel; veterinary practice; 200sqm retail; community facilities.	Committee resolution to approve December 2013.	Expected 2014/15.
HCA / St. Modwen	13/P/0977/OT2	Outline	Mixed-use "masterplan" application including up to 1,200 dwellings; 5.5ha employment; 2.1ha retail / services; 5.15ha leisure; 4.2ha education; 32.4ha landscaping, infrastructure, open space etc.	Committee resolution to approve December 2013.	Expected 2014/15.

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