

# **North Somerset Strategic Housing Land Availability Assessment**

## **Main Report**

**September 2018**

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See online mapping of sites alongside schedules

## Executive Summary

- E1 The Strategic Housing Land Availability Assessment (SHLAA) forms part of the evidence base for the new North Somerset Local Plan including by providing an understanding of the characteristics of residential land supply and opportunities available within North Somerset to meet housing needs. Guidance on producing the assessment is provided in the National Practice Guidance and the methodology set out there has been pursued for this study.
- E2 This process enables local planning authorities to establish realistic assumptions about the availability, suitability and the achievability of land to meet the need for housing over the plan period.
- E3 This study is being published alongside the new Local Plan Issues and Options public consultation. Further review and updates to it are expected e.g. to take into account additional sites submitted through the Local Plan process, and further sites identified. In addition the level of detail presented at this stage is considered to be proportionate to the stage of the Issues and Options. Further detail on sites will be presented at future stages of the Local Plan to support land allocation.
- E4 The following conclusions are drawn from this study:
- A large number of sites have been submitted to consider their development potential covering a wide range of site types including large strategic sites, urban locations and smaller green field opportunities.
  - The requirement is to identify sufficient land to accommodate around 25,082 dwellings to 2036, much of which is already committed as shown in Table E1.
  - There is a priority to reuse brownfield land and to focus new housing in urban areas including exploring the potential for increasing density and building up. A number of site opportunities identified through this study fall into this category and can be considered further through the plan making process.
  - The Council will examine the opportunities to increase capacity from identified sites, including any additional potential arising from urban living and the proposed Strategic Development Locations. The SDLs identified through the JSP make up a significant portion of the dwelling requirement and separate work is exploring the development potential from these strategic sites.
  - Additional potential opportunities to address any shortfall in the housing challenge are identified in the SHLAA. The sites identified through this study are defined as having 'likely' (A sites) or 'less likely' potential (B sites). The identification of specific sites or capacities does not mean that these sites are endorsed by the local planning authority. The purpose is to

provide a range of site opportunities, some of which can be considered further for possible allocation in the new Local Plan.

- The overall finding is that identifying sufficient suitable sites within North Somerset to meet the dwelling requirements emerging through the JSP is going to be extremely challenging and will require the consideration of a range of complex sites identified as having 'less likely' potential. Much of the dwelling provision is reliant on supporting infrastructure delivery.

<b>Potential housing supply</b>		
		<b>Dwellings</b>
<b>Housing challenge</b>	JSP NSC proposed housing requirement 2016–2036	<b>25,082</b>
<b>Currently identified housing supply</b>		
1	Completions 2016-2017	<b>1,192</b>
2	Planning permissions at October 2017	<b>7,597</b>
3	Windfall (2026-2036)	<b>1,300</b>
4	Site Allocations Plan allocations	<b>4377</b>
5	Strategic Development Locations (Emerging policy)	<b>7850</b>
6	<b>Total 'known' supply</b>	<b>22316</b>
7	Additional capacity to be identified through the Local Plan 2036	<b>2766</b>
<b>Additional potential dwelling capacity for consideration through plan making</b>		
8	'A' sites: Likely to have potential	<b>638</b>
9	'B' sites: Less likely to have potential	<b>4,900</b>
10	Additional capacity on allocated sites	<b>295</b>
Table E1: Potential housing capacity versus requirement		

# 1 Introduction

## National planning policy context

- 1.1 National planning advice encourages local planning authorities to prepare a Strategic Housing Land Availability Assessment as a key part of their evidence base when preparing a local plan. Government advice as set out in the National Planning Policy Framework (2018) states that:

*“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

*a) specific, deliverable sites for years one to five of the plan period; and*

*b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*

(Paragraph 67)

- 1.2 The assessment is used to support plan preparation by providing an understanding of the characteristics of residential land supply and opportunities available within North Somerset to assist the plan-making process. Guidance on producing the assessment is provided in the National Practice Guidance. This process enables local planning authorities to establish realistic assumptions about the availability, suitability and the achievability of land to meet the need for housing over the plan period.

- 1.3 An Employment Land Review (ELR) has been prepared separately for North Somerset. This will assess the current supply of employment sites and identify any requirements for new sites both from a qualitative and quantitative perspective. The SHLAA and ELR together contribute to the evidence base to assist the process of identifying housing and employment allocations in the new Local Plan 2036.

## Purpose of the SHLAA

- 1.4 The primary purposes of the SHLAA are to:
- Identify sites with potential for housing.
  - Assess their development potential (suitability).
  - Assess the likelihood of development coming forward (availability and achievability).
- 1.5 This approach ensures that all potential land supply options are assessed together to help inform which sites are the most suitable and deliverable. The SHLAA provides an evidence base on residential land supply to inform plan

making, primarily the emerging Local Plan 2036. Most sites are identified as part of the 'call for sites' exercise which encourages landowners and developers to put their sites forward for consideration.

- 1.6 Sites are appraised to assess their suitability, availability, and achievability, the extent of any constraints, and possible actions to address them, and an assessment made of the likely scale of development. Based on evidence and reasonable assumptions around anticipated availability, an indication is then given as to the potential supply across the plan period, both in terms of contribution to the 5 year supply and longer term housing land supply in line with the NPPF guidance.
- 1.7 The base date for the study is October 2017 reflecting up-to-date housing completions data and covers the JSP and Local Plan period to 2036. Identified supply includes supply across the following time periods:
- Initial 5 years (2018-2023) – Short term
  - Years 6-12 (2024-2036+) – Medium/long term
- 1.8 The Assessment is not part of the development plan and does not allocate sites. It is an evidence source providing an overall assessment of housing potential including detailed appraisal of specific sites. The identification of particular sites does not imply that there is a presumption in favour of any development proposal or that planning permission will be granted should an application be submitted. All such proposals will be considered through the normal development management process. *'The Assessment is an important evidence source to inform plan-making but does not in itself determine whether a site should be allocated for development'* (National Planning Policy Guidance).
- Structure of the SHLAA**
- 1.9 The diagram reproduced below from the National Planning Practice Guidance (ID 3-006-20140306) identifies the key stages of the methodology which form the main structure of the report.

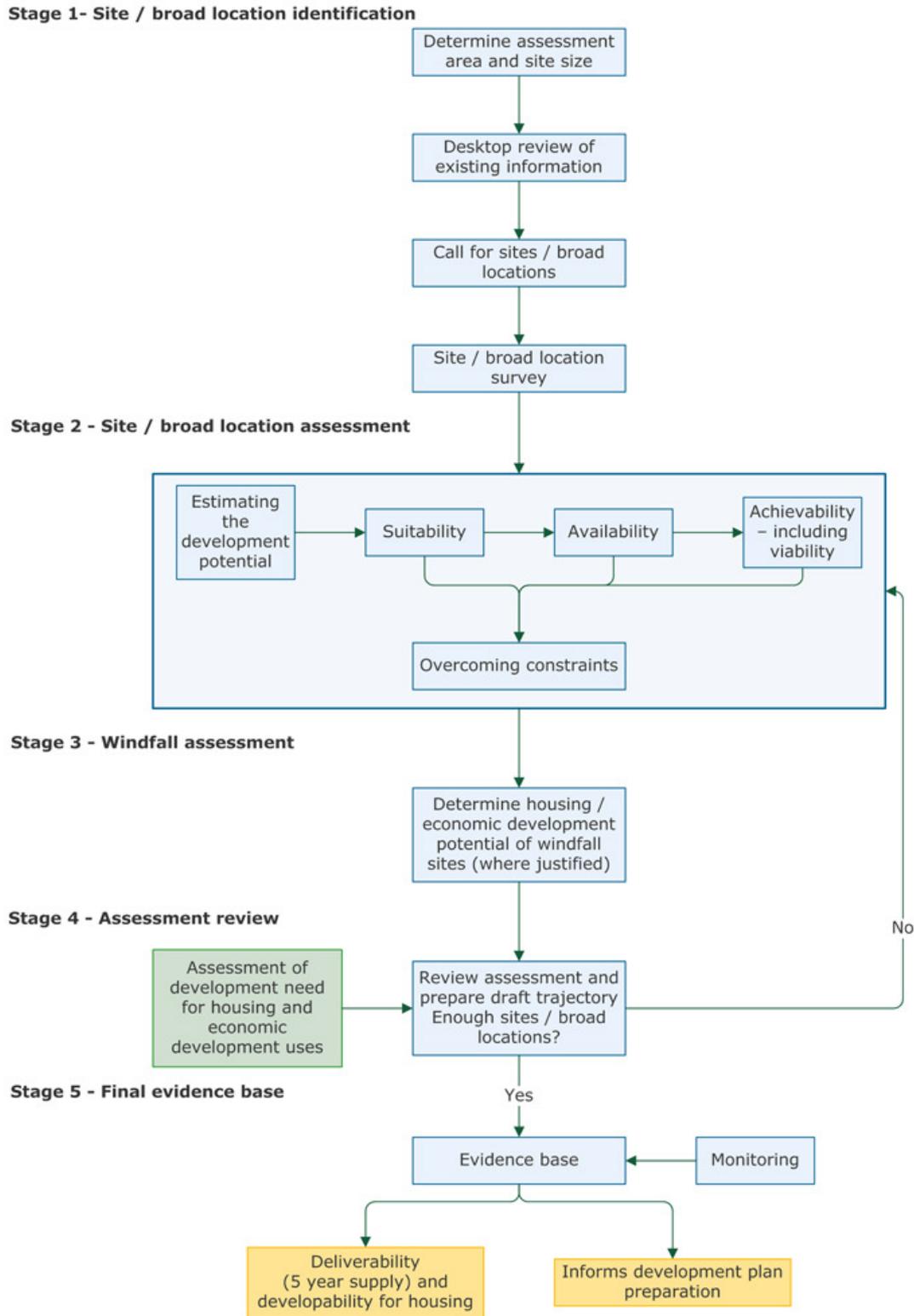


Figure 1: SHLAA methodology - NPPG

## Planning policy context in North Somerset and the housing challenge

- 1.10 The study will contribute to the evidence base for the new Local Plan 2036 that is being prepared in the context of the emerging West of England Joint Spatial Plan (JSP). The JSP was submitted for examination in April 2018 and proposes an overall dwelling provision of around 25,082 for North Somerset 2016-2036. The JSP indicates that this should be broadly distributed as follows. This effectively sets out the housing challenge for North Somerset against which the SHLAA findings will be assessed.

Supply component	Housing requirement
Existing commitments	13,932
Strategic Development Locations	7,850
Urban Living	1,000
Non-strategic	1,000
Windfall	1,300
Total	25,082

Table 1: Joint Spatial Plan proposed housing provision in North Somerset

- 1.11 The Council will explore through the plan-making process opportunities to narrow the gap between the anticipated supply and the current housing requirement. This will include exploring the potential to increase capacities on identified sites, including the emerging Strategic Development Locations and to increase densities and build up on previously developed land in urban areas.

## Stage 1: Site/ Broad Location identification

### Determining assessment area and site size

- 2.1 The HLAA relates to the administrative area of North Somerset. Given the characteristics of the land supply position and need to identify a range of site sizes, no minimum site size threshold has been used for the study.

### Desktop review of existing information

- 2.2 Existing information in relation to potential sites and dwellings in the development pipeline was assessed including sites with planning consent and extant plan allocations.
- 2.3 The study reviewed sites from the following sources including the call for sites exercises where landowners and developers are asked to submit potential sites for consideration and where sites are submitted as part of local plan consultations:
- All sites from the North Somerset 2014 HELAA.
  - Sites submitted through the JSP process to date (including 'call for sites' (2015), Issues and Options consultation (2016), Towards an Emerging Spatial Strategy consultation (2017) and Publication Consultation (2017/2018)).
  - Sites submitted as part of the North Somerset Site Allocations Plan.

- Sites submitted through the latest 'call for sites' for North Somerset at the beginning of 2017.
- Sites identified through JSP Urban Living.

2.4 Taken together, the range of sites provide a comprehensive pool of sites to consider covering a wide range of supply types, providing the evidence base to support the delivery of housing in North Somerset. To avoid any duplication, a single layer of sites was compiled from the above sources to take forward for assessment through the study. Where site entries overlap between the various sources, the most recent site area is assumed, unless as specified in the site assessment document.

2.5 Additional sites identified or submitted through the course of the new Local Plan production will be considered in future review and updating of the SHLAA. The next review stage is expected to inform the draft Local Plan in 2019.

#### *Emerging Strategic Development Locations*

2.6 This study factors in the dwelling potential identified for the emerging JSP Strategic Development Locations (SDL). High-level capacity studies have already been carried out for these through the JSP process to inform the capacities in the Publication JSP. Further work to inform the new North Somerset Local Plan will include exploration of options to deliver the developments and associated dwelling capacity testing. The Local Plan Issues and Options consultation document sets out broad Concept Diagrams for each SDL and Alternative Scenarios to accommodate the development.

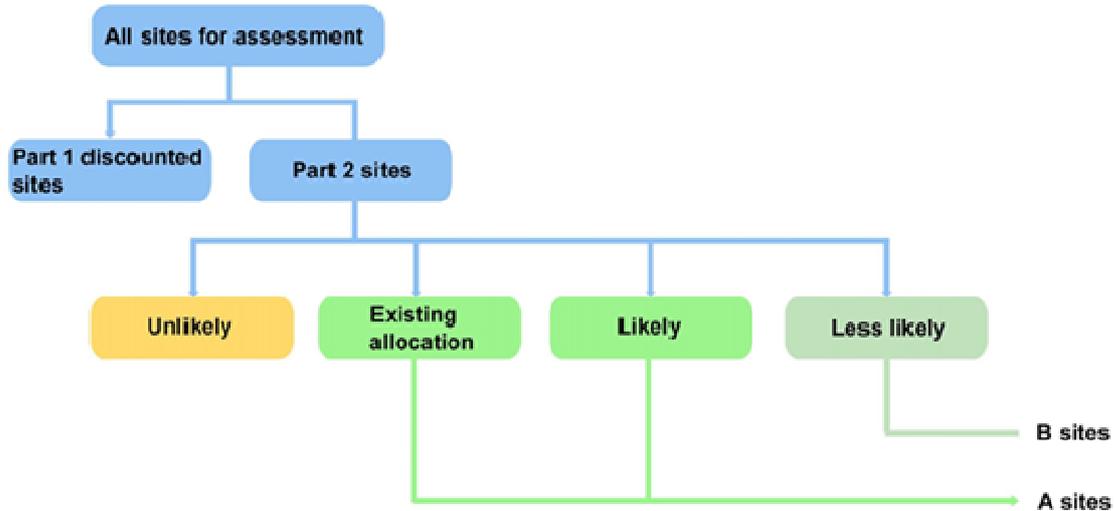
2.7 During the site source review stage, any sites within or in the immediate vicinity of the SDLs are not assessed as part of this study, but the land availability information will be taken into account in the ongoing SDL work. This includes any call for site submissions provided.

## **Stage 2: Site assessment**

### **Assessing the development potential of sites**

3.1 All sites were subjected to a two-part assessment process in line with the approach set out in the NPPG (paragraph 015 Ref ID: 3-015-20140306). Figure 2 illustrates the assessment stages followed in the study.

#### **Figure 2: Site assessment process**



*Part 1 assessment*

3.2 This stage considered all sites against the key constraints listed in the bullet points below. Sites falling within any of these categories were discounted during the Part 1 assessment stage and are referred to as ‘Part 1 discounted sites’. These are scheduled in Appendix A.

- Sites designated SSSI<sup>1</sup>.
- Sites entirely within the Green Belt.
- Sites entirely covered by Local Green Space<sup>2</sup>.
- Sites entirely within the AONB.
- Sites entirely within flood zone 3b (footnote 6 refers to flood risk generally- areas of lesser risk will be identified within site appraisals).
- Sites with no boundary adjoining an existing settlement boundary (unless site is brownfield).

*Part 2 assessment*

3.3 Following Part 1, the remaining sites were subject to a more detailed appraisal for their housing potential in relation to their suitability, availability, and achievability. This included two phases; an initial phase of identifying site attributes, features and constraints that would influence development potential (site profiling), and a second review phase to evaluate the findings to identify the potential for further consideration in the plan making process. This review phase considered:

- Implications of the constraints and actions to overcome them.
- Delivery prospects including phasing and indicative trajectory.
- Review of the Benchmark Dwelling Capacity<sup>3</sup> and indicative site delivery performance.

<sup>1</sup> Only 16 sites were recorded as having a boundary interacting with a SSSI designation but in all cases did not necessarily affect the sites potential. In most cases therefore, this did not result in the site being ruled out in the initial sieve

<sup>2</sup> As set through the North Somerset Site Allocations Plan (2018)

<sup>3</sup> A Benchmark Dwelling Capacity is assumed based on predefined methodology (outlined in para 3.7 *Estimating Dwelling Potential* of the main report) and used as a starting point in the study to provide a

- Likelihood of the site having potential for development, identified as either ‘unlikely’, ‘less likely’, ‘likely’, or an ‘existing housing allocation’.

#### *Outcome of the site assessment process*

- 3.4 The outcome of the assessment process was to identify those sites that are potentially suitable, available and achievable. Having potential for development does not imply that the site will be allocated for development as this is part of the plan-making process which will need to take wider considerations into account. NPPG Paragraph 003 Reference ID: 3-003-20140306 confirms:

*‘It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.’*

- 3.5 Each site is categorised as follows:

<b>Assessment outcome</b>	<b>Explanation</b>
<b>‘Unlikely’</b>	<i>The site is considered unlikely due to specific constraints identified, or a combination of factors. In some cases, recent planning application decisions are taken into account to inform this assessment.</i>
<b>‘Less likely’ to have potential (‘B’ sites)</b>	<i>The site is considered to have some potential for further consideration however it is subject to significant constraints or it may not form a suitable allocation in itself. In many cases it may rely on wider measures to make it more suitable or achievable such as the cessation/relocation of an existing use.</i>
<b>Likely to have potential (part of A sites)</b>	<i>The site is considered to have reasonable potential for further consideration and should be considered further in the plan making process. In many cases these sites may still be subject to constraints that would need to be addressed to bring the site forward.</i>
<b>Existing Housing Allocation (part of A sites)</b>	<i>The site is already allocated for housing in the Site Allocations Plan (2018), and if not consented or developed in the interim, should be considered for rolling forward into the new Local Plan. In some cases the study has identified additional potential capacity at the allocated sites that could be considered</i>

consistent set of dwelling yield outputs. For each site, or groups of sites, these are reviewed to determine their appropriateness in identifying a reasonable dwelling yield.

upon review of the allocations.
Table 2: Site assessment categories

### Estimating development capacity

- 3.6 Density multipliers have been used to provide a consistent Benchmark Dwelling Capacity (BDC) across all sites. Table 3 sets out the input assumptions to generate the BDC. This provides an indicative capacity only as the methodology cannot entirely factor in the nuances of a given site which would need to be undertaken if the site was to be considered for allocation. The approach differentiates between dwelling yield on smaller sites where the net residential area to gross site area ratio will generally be higher, and larger sites where the addition of other non-residential uses will reduce the ratio. For context, the JSP SDL work applied a basic assumption of 40dph across 50% of the gross site area for strategic sites. This study provides a check on that method at a finer grain to determine capacity. Some commentary on the results of this is included in the Review section.

Site size (ha)	Net Residential Area assumed as a percentage of gross site area	Density
Up to 2	100%	40
2 to 10	75%	
10+	50%	
<b>BDC = (Site area x NRA) x average density</b>		

Table 3: Dwelling yield assumptions

- 3.7 The dwelling capacity estimated for each site also assumes the provision of dwellings on the site is being maximised. It may be that alternative solutions to the site's development are preferred such as the provision of employment on the site. Some allowance for this is made on the larger sites, but on smaller sites, this is assumed to be undertaken at plan-making stage and the dwelling capacities may be altered accordingly. Development briefs and/or masterplanning processes could be utilised to explore and test alternative site approaches.
- 3.8 Where certain policy drivers apply this has informed the dwelling capacity assessment. For brownfield sites in urban areas for example higher density assumptions have been applied as set through the *Urban Living Topic Paper*<sup>4</sup> and these are generally higher than the BDC identified in this study but are likely to require greater interventions to secure delivery.
- 3.9 In cases where more detailed information is available and where dwelling yields have been refined through site specific analysis (including assessment of local character and site constraints), these are recorded for each site as an alternative

<sup>4</sup> [JSP Examination Document SD 14k, Topic paper 7: Urban Living Update Paper \(April 2018\)](#)

to the BDC. Capacity indications provided through call for site submissions have also been reviewed for each site and compared to the BDC.

- 3.10 It is important to ensure dwelling yield is not overestimated so as not to lead to an under-provision of land for housing. The approach highlights the two key variables that determine dwelling yield from a given site; density and net residential area.

#### **Assessing suitability**

- 3.11 The general assumption is that a site will be suitable for the assessed use if it offers a suitable location for that use, is not subject to insurmountable constraints that cannot be mitigated, and would contribute to the creation of sustainable, mixed communities. The NPPG sets out a number of factors which should be considered when assessing site suitability and these have been factored into the site appraisal process.
- 3.12 As set out in paragraph 3.1 a two-stage assessment process was employed. This is described in more detail below.

#### *Part 1 constraints*

##### *Green Belt*

- 3.13 The submitted JSP has not identified a strategic requirement for the North Somerset Local Plan to release land in the Green Belt for housing development and the proposed SDLs are all located outside the Green Belt. The assumption in this study is therefore that new sites in the Green Belt are unsuitable as a matter of principle due to them being inappropriate development in the Green Belt. Clearly if the approach taken in the JSP were to change through the examination process, there are a range of Green Belt sites that could be considered subject to exceptional circumstances being demonstrated and progressed through the plan making process and in consultation with local communities.

##### *Area of Outstanding Natural Beauty*

- 3.14 AONB is land of significant landscape value protected under the Countryside and Rights of Way Act 2000 (CROW Act), to conserve and enhance its natural beauty.

##### *SSSI*

- 3.15 Land designated as Sites of Special Scientific Interest equates to around 3,483ha across various locations and habitats in North Somerset, from the watercourses associated with the Tickenham, Nailsea and Kenn Moors, to the Banwell Caves. SSSI are protected by law to conserve their wildlife or geology under the Wildlife and Countryside Act (1981).

##### *Flood zone 3b*

- 3.16 Housing development is not permitted within the functional flood plain.

##### *Local Green Space*

3.17 Local Green Spaces are allocated for their beauty, historic importance, recreational value (including as a playing field), tranquillity or richness of its wildlife. Any review of LGS through the Local Plan may lead to a review of the HLAA findings.

*Remote sites*

3.18 The methodology discourages locations poorly related to existing services and facilities, where it is not of a scale to deliver its own facilities and transport improvements, and where unsustainable car use is likely to be a key feature. For the purposes of this study, sites not adjoining an existing settlement boundary have been discounted at the first sieve. There is potential for these to be reviewed in the future taking into account any possible amendments to settlement boundaries.

*Considering other constraints through the Part 2 assessment process*

3.19 Other constraints are numerous including various environmental and ecological constraints, heritage assets, attractive landscape and flood risk, particularly land designated fluvial and/or tidal 3a risk. Unlike those used in the Part 1 assessment stage, these constraints are not necessarily insurmountable however do indicate potential constraints to housing development that would need to be addressed. Where relevant these were identified for each site through the constraints profiling process prior to evaluation. Many of these other constraints, whilst important considerations, do not necessarily rule a site out but the cumulative impact of them alongside other constraints potentially diminishes the site's potential for development, or at least indicates development to be more complex, costly, and potentially more difficult to deliver. In some cases, a site is large enough to be able to allow for masterplanning to avoid sensitive parts of the site and some allowance is made for this within the dwelling yield calculation. Note: the assessment of constraints at this stage is proportionate to the Issues and Options stage of the Local Plan. Additional analysis and evaluation is anticipated to inform the next stage of the Local Plan.

3.20 North Somerset is home to a number of bat species including the legally protected Greater and Lesser Horseshoe Bats. As part of the approach to safeguarding the favourable conservation status of these species the Mendip Hill Bat Special Area of Conservation (SAC) is designated including a number of 'component sites'. The adopted Bat SPD identifies a series of Consultation Zones that extend across much of North Somerset. It also identifies Juvenile Sustenance Zones (JSZ) that are particularly sensitive to development. The approach in this study is to identify where a site overlaps with JSZ and to record the relevant bat Consultation Zone. Sites in zone A are of particular concern given the sensitivity of this location. The basic action to address this constraint where impacts have been identified is to devise a suitable mitigation strategy based upon a full and comprehensive understanding of impacts, and in-combination effects.

3.21 The Assessment has considered each site on its merits and makes no assumption as to the combination of potential sites that may come forward either as speculative development proposals or as land use allocations. Further evaluation of the cumulative impact/constraints across a combination of sites

should be considered once defined options/scenarios for land supply are developed through the plan making process. SA and other techniques will examine the distribution options at a strategic level informed by other technical work such as transport assessments and education provision analysis.

### **Assessing availability**

- 3.22 The general assumption is that a site is considered available for development when, on the best information available, there is confidence that there are no overriding factors such as legal or ownership problems, multiple ownerships, ransom strips, tenancies or operational requirements of landowners which would remove the realistic prospect of the site coming forward.
- 3.23 A general assumption applied in this study is that if a site has been submitted for consideration through a call for sites exercise or through a representation, the site is available within the plan period to 2036. Whether it is available immediately is another matter that is often indicated through the call for sites process.

### **Assessing achievability including viability**

- 3.24 Planning Practice Guidance requires that all policy requirements are set out at the plan making stage and viability tested in order that this can inform the price paid for land. It also confirms that the role for viability assessment is primarily at the plan making stage, and that viability testing is not required to consider each individual site.
- 3.25 Central to this is the assumption that to be viable, the development of the site should deliver an appropriate return to the landowner whilst achieving policy requirements and aspirations for the development. The balance between development costs and value are critical to this and as such the prospects for viability are likely to be influenced by the location of the site, the demand for property in the area, as well as any specific costs that could arise through the development e.g. related to site remediation or other 'abnormal' costs.

#### *Determining viability of the SDLs*

- 3.26 Separate work undertaken as part of the JSP evidence has considered the potential viability of the SDLs<sup>5</sup>. This modelling assumed expected sales expectations at the locations compared to costs and identified surplus values in the schemes at varying levels of affordable housing. All North Somerset SDLs are considered potentially viable.

### **Overcoming constraints**

- 3.27 Many sites identified within the Assessment are subject to constraints of varying type and complexity ranging from physical constraints to availability issues. Where these are known they are included within the assessment of each site along with some possible actions to overcome them under the Constraints Summary of Appendix B. Further analysis will be required at the planning

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<sup>5</sup> JSP Submission: Topic Paper 4: [BNP Paribas \(2017\) An Assessment of Viability Potential within the SDLs](#)

application stage (perhaps as part of early site feasibility studies) or at the plan-making stage where a site is being formally considered for allocation.

- 3.28 There are recurring constraints that affect a number of sites including those related to ecological impact, drainage and flood risk. Site by site mitigation may be an option to secure some of these sites, however opportunities for proactive and strategic mitigation can also be considered that could offer opportunities to address constraints more effectively.

## Stage 3: Windfall assessment

- 4.1 The NPPF allows local planning authorities to include an allowance for windfall sites in their five-year supply if there is compelling evidence that such sites consistently become available in the local area and are expected to continue to form a reliable source of supply.
- 4.2 Windfall developments across the district have made a significant contribution to housing delivery in previous years and this is expected to continue. Table 4 sets out the windfall completion figures on small sites (those with a net capacity of up to 9 dwellings) over the plan period so far within North Somerset.

	Clevedon	Nailsea	Other	Portishead	WSM	TOTAL
2016/17	33	15	61	10	52	171
2015/16	-1	20	37	7	33	96
2014/15	8	9	56	8	72	153
2013/14	22	5	60	16	34	137
2012/13	20	16	46	8	25	115
2011/12	19	4	49	4	46	122
2010/11	9	2	44	3	54	112
2009/10	19	6	39	8	96	168
2008/09	-3	9	48	23	126	203
2007/08	52	9	58	10	163	292
2006/07	20	11	72	28	118	249
<b>TOTAL</b>	<b>198</b>	<b>106</b>	<b>570</b>	<b>125</b>	<b>819</b>	<b>1,818</b>

Table 4: Windfall on small sites 2006 to 2017

- 4.3 The 1,818 windfall completions on small sites between 2006 and 2017 have been delivered despite challenging economic circumstances and a restrictive policy approach to rural development as set out in the former Replacement Local Plan and the current Core Strategy/Site Allocations Plan. Overall it is the council's assessment that small site windfalls will continue to come forward at least at a similar rate to that of previous years.
- 4.4 The NPPF also states that the calculated windfall allowance should not include development on residential gardens. According to previous Communities and

Local Government (CLG) Research, Ordnance Survey data indicates that within North Somerset 17% of the new build residential completions that took place were on land that was previously in use as a residential garden.

- 4.5 A small site windfall allowance of 137 dwellings per annum is therefore expected for the remainder of the plan period. This figure has been calculated by taking the plan period average of 165 units per year, less 17% assumed to be delivered on garden land. This quantum forms part of North Somerset's existing commitments figure.
- 4.6 Beyond the current planning horizon of 2026 the council have assumed a rounded figure of 130 dwellings from small sites will continue to come forward, up to the end of the JSP period in 2036. This will be monitored on an annual basis to ensure it continues to be achieved.

## Stage 4: Assessment review

### The housing requirement to 2036

- 5.1 The housing challenge is to identify sufficient potential capacity to deliver the proposed JSP dwelling requirement for North Somerset of some 25,082 dwellings 2016-2036.

### Existing and emerging commitments

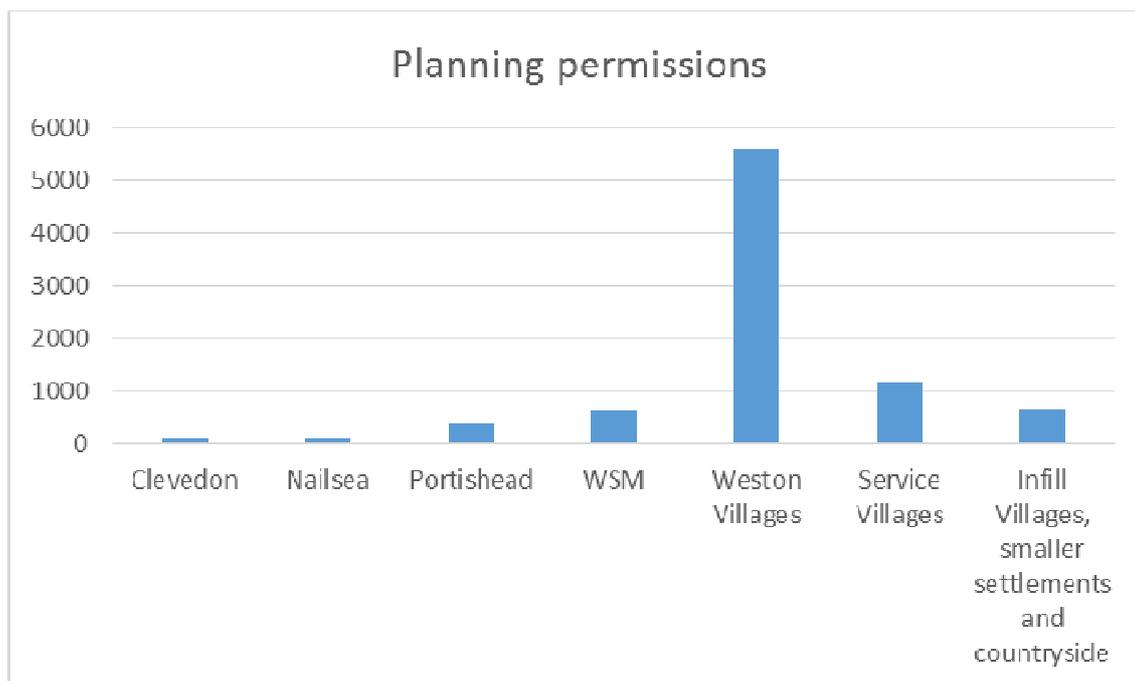
- 5.2 The approach to assessing the various categories of housing supply is as follows:

#### *Completions*

- 5.3 There were 1192 completions in North Somerset 2016-2017 that should be deducted from the 2016-2036 plan period requirement emerging through the JSP.

#### *Planning permissions*

- 5.4 Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. These are reviewed in order to assess the likely level of housing development that may come forward in the short term. The Residential Land Survey maintains a schedule of sites with an outstanding permission.
- 5.5 At October 2017 there were **7,597** dwellings with planning permission, **687** of which were on small sites, and 5,580 of which are located at the Weston Villages.



**Figure 3: Planning permissions by selected area**

#### *Windfall*

- 5.6 The windfall component from small sites over the plan period is estimated to be 1,300 dwellings 2026-2036.

#### *Existing housing allocations*

- 5.7 The Site Allocations Plan (2018) identifies **4,377** dwellings on allocated sites that had no planning permission at October 2017 and are identified on the site schedule.

- 5.8 A further 295 dwellings have been assessed as being potential further capacity from some of these sites based upon either an uplift generated from the application of the methodology to derive the Benchmark Dwelling Capacity, or derived from separate work on Urban Living. These sites effectively provide a supply of committed sites that could contribute towards the JSP figure in the short to medium term although the study has identified that some cannot be considered available at this stage indicating them to be medium to longer term supply. The uplift identified could be allocated through the Local Plan if the site were to be rolled forward from the Site Allocations Plan.

#### *Strategic Development Locations*

- 5.9 The anticipated capacities at the four North Somerset Strategic Development Locations are:

- Banwell Garden Village: 1900
- Mendip Spring Garden Village: 2675
- Backwell: 700 dwellings
- Nailsea: 2575

- 5.10 These capacities reflect the Publication JSP capacities for these locations based upon high-level capacity work at the SDLs. Further work is in progress on each of the SDLs through the Local Plan process to review and consider options for the development of the SDLs, including in due course detailed masterplanning. As masterplanning options are developed, land budgeting exercises will be undertaken working with developers at the sites to confirm the capacities achievable.

#### **New opportunities identified through SHLAA**

- 5.11 The above categories represent the ‘known’ opportunities and are collectively expected to deliver some **22,316** dwellings over the plan period. That leaves some **2,766** additional dwellings to identify through the plan-making process, to be informed by the findings of the SHLAA. Further work will be undertaken to minimise the additional dwellings required to be identified through the local plan by investigating opportunities to increase capacity at known locations.

#### *Total land considered*

- 5.12 The study has considered some 2,678ha of land across North Somerset. The initial Part 1 sieve ruled out just over 60% this land and those sites were not taken forward to detailed appraisal. This left a range of sites to be considered further categorised as ‘unlikely’; B sites - ‘less likely’; A sites - ‘likely’ and existing housing allocations (see Table 2 for an explanation of the categories).

- 5.13 All sites considered through the assessment can be viewed in Appendices A and B. Appendix A schedules those sites discounted during the Part 1 assessment, and those sites assessed as unlikely through the Part 2 assessment. Appendix B schedules the sites considered to have some development potential comprising the ‘A’ and ‘B’ sites as illustrated in Figure 2.

#### *Review of dwelling potential*

- 5.14 The overall SHLAA findings are summarised in Table 6. The large majority of the housing requirement is accounted for with existing sites and sites emerging through the JSP. There is insufficient potential capacity identified to meet the residual requirement using supply just from the ‘likely’ A sites, but enough when taking account of the ‘less likely’ B sites and through increased yield on existing allocated sites.

<b>Potential housing supply</b>		
		<b>Dwellings</b>
<b>Housing challenge</b>	JSP NSC proposed housing requirement 2016–2036	<b>25,082</b>
<b>Currently identified housing supply</b>		
1	Completions 2016-2017	<b>1,192</b>
2	Planning permissions at October 2017	<b>7,597</b>
3	Windfall (2026-2036)	<b>1,300</b>
4	Site Allocations Plan allocations	<b>4377</b>

5	Strategic Development Locations (Emerging policy)	<b>7850</b>
6	<b>Total 'known' supply</b>	<b>22316</b>
7	Additional capacity to be identified through the Local Plan 2036	<b>2766</b>
<b>Additional potential dwelling capacity for consideration through plan making</b>		
8	'A' sites: Likely to have potential	<b>638</b>
9	'B' sites: Less likely to have potential	<b>4,900</b>
10	Additional capacity on allocated sites	<b>295</b>
Table 5: Potential housing capacity versus requirement		

- 5.15 Dwelling capacity identified from the 'A' sites coupled with existing commitments, completions, and potential supply from non site-specific sources indicates a total potential capacity of **22,954** dwellings up to 2036. When considering the B sites, this indicates a range of sites of sufficient potential opportunity to consider to meet the dwelling requirement emerging through the JSP. While this capacity assumes standard densities at 40 dwellings per hectare alternative density assumptions are also assessed.
- 5.16 To accommodate additional capacity above 22,954 dwellings will require consideration of potential that is likely to be more constrained and challenging or increasing the yield of sites, both of which raise delivery challenges. The potential cost, complexity and reasonable prospect of delivery of more difficult sites needs to be taken into account. It should be noted that even achieving the 22,954 is challenging including delivery of strategic sites and the usual complexities of bringing these forward, the need for infrastructure provision and the capacity of the development industry to deliver at the required volume and timescale.
- Review of housing yield methodology**
- 5.17 The application of the methodology to devise the Benchmark Dwelling Capacity provides a consistent and comparable yield across all sites but does not take into account the nuances of each particular site. Its benefit is in providing a benchmark capacity to be considered in further detail, but it cannot take into account detailed factors such as its shape, access arrangements, features on-site etc. When reviewing these against call for site submissions, in many cases capacities indicated they are generally lower and this could indicate a tendency for the BDC methodology (Table 3) to over-estimate potential. If a site is taken forward for proposed allocation, the range of capacity assumptions must be considered and if necessary further investigations carried out in order to allocate a robust capacity.
- Consideration of potential for reduced capacity*
- 5.18 There is a risk of overestimating dwelling capacity through the application of the BDC. This standard method of calculating capacity assumes 40 dwellings per hectare average density that may not be achievable on certain sites, and it also

does not take into account the specific nuances of each site. Table 7 indicates the overall capacity using alternative average density assumptions. Where there has not been any change to the BDC through the capacity review, two alternative densities have been applied. The analysis quantifies the overall reduction in potential capacity. It should also be noted that the BDC is likely to underestimate capacity in urban areas given the likely type of residential development possible. However, given the overall balance between urban and rural sites, the overall likelihood is of an overall overestimate rather than an underestimate of potential capacity hence the scenarios in Table 6. The BDC is therefore considered to be generally robust.

	Current supply + completions and 'A sites'
BDC 'Standard method'	22,954
Alt 1: 35dph	22,867
Alt 1: 30dph	22,781
Table 6: Quantifying the effect of reduced average densities	

*Summary of observations*

5.19 The following conclusions can be drawn from the study:

- A large number of sites have been submitted to consider their development potential covering a wide range of site types including large strategic sites, urban locations and smaller green field opportunities.
- The requirement is to identify sufficient land to accommodate around 25,082 dwellings to 2036, much of which is already committed as shown in Table E1.
- There is a priority to reuse brownfield land and to focus new housing in urban areas including exploring the potential for increasing density and building up. A number of site opportunities identified through this study fall into this category and can be considered further through the plan making process.
- The Council will examine the opportunities to increase capacity from identified sites, including any additional potential arising from urban living and the proposed Strategic Development Locations. The SDLs identified through the JSP make up a significant portion of the dwelling requirement and separate work is exploring the development potential from these strategic sites.
- Additional potential opportunities to address any shortfall in the housing challenge are identified in the SHLAA. The sites identified through this study are defined as having 'likely' (A sites) or 'less likely' potential (B sites). The identification of specific sites or capacities does not mean that these sites are endorsed by the local planning authority. The purpose is to

provide a range of site opportunities, some of which can be considered further for possible allocation in the new Local Plan.

- The overall finding is that identifying sufficient suitable sites within North Somerset to meet the dwelling requirements emerging through the JSP is going to be extremely challenging and will require the consideration of a range of complex sites identified as having 'less likely' potential. Much of the dwelling provision is reliant on supporting infrastructure delivery.

## Stage 5: Final evidence base

- 6.1 This section forms the final stage in the process of the SHLAA which is to check that the core outputs of the study have been met in order to provide a robust assessment of land supply in line with national guidance. Table 10 summarises the core outputs.

### **Core outputs check**

<b>Core output</b>	
A list of all sites or broad locations considered, cross-referenced to their locations on maps	✓
An assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site/ broad location is viable) to determine whether a site is realistically expected to be developed and when	✓
Contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons	✓
The potential type and quantity of development that could be delivered on each site/ broad location, including a reasonable estimate of build-out rates, setting out how any barriers to delivery could be overcome and when	✓
An indicative trajectory of anticipated development and consideration of associated risks.	✓
Table 10: SHLAA Core Outputs checklist	

- 6.2 The evidence from this work can now inform future plan making in North Somerset and the wider West of England alongside other mechanisms such as sustainability appraisal and other work. In addition, land supply will be subject to ongoing monitoring for both housing and economic uses to ensure an effective and sufficient land supply is maintained, and to help shape options through the plan-making process. This will feed into assessments of short-term (5 year) land supply.