# HOUSING LAND SUPPLY STATEMENT OF COMMON GROUND (2)

## BETWEEN

PERSIMMON HOMES, GLADMAN DEVELOPMENTS LTD, REDCLIFFE HOMES, MACTAGGART AND MICKEL HOMES, TAYLOR WIMPEY, ST MODWEN, GLEESON HOMES & EDWARD WARE HOMES

## SITES AND POLICIES PLAN PART 2: SITE ALLOCATIONS PLAN EXAMINATION

<table>
<thead>
<tr>
<th>Signed:</th>
<th>Name:</th>
<th>On behalf of:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Paul Davis</td>
<td>Persimmon Homes</td>
</tr>
<tr>
<td></td>
<td>Robert Wilding</td>
<td>Gladman Developments Ltd</td>
</tr>
<tr>
<td></td>
<td>Lucy White</td>
<td>Redcliffe Homes</td>
</tr>
<tr>
<td></td>
<td>Dr Tom Rocke</td>
<td>MacTaggart and Mickel Homes</td>
</tr>
<tr>
<td></td>
<td>Jeff Richards</td>
<td>Taylor Wimpey</td>
</tr>
<tr>
<td></td>
<td>Peter Stockall</td>
<td>St Modwen</td>
</tr>
<tr>
<td></td>
<td>Mark Jackson</td>
<td>Gleeson Homes</td>
</tr>
<tr>
<td></td>
<td>Jeff Richards</td>
<td>Edward Ware Homes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
<th></th>
</tr>
</thead>
</table>
CONTENTS:

1. INTRODUCTION .............................................. 1
2. HOUSING REQUIREMENT ................................... ERROR! BOOKMARK NOT DEFINED.
3. APPROACH .................................................. 3
4. BUFFER ...................................................... 4
5. FIVE YEAR HOUSING REQUIREMENT .................. 6
6. DELIVERABLE SUPPLY ..................................... 7
7. FIVE YEAR HOUSING SUPPLY ............................ 13
1. **INTRODUCTION**

1.1 This Housing Land Supply Statement of Common Ground ("SoCG") has been prepared by Pegasus Group and Gladman Developments and reviewed by Turley and Rocke Associates on behalf of Persimmon Homes, Gladman Developments Ltd, Redcliffe Homes, MacTaggart and Mickel Homes, Taylor Wimpey, St Modwen, Gleeson Homes and Edward Ware Homes.

1.2 This SoCG is complementary to the SoCG agreed between the above signatories and North Somerset Council. However, this SoCG identifies those matters which are agreed between the signatories but which could not be agreed with the Council.

1.3 The purpose of the SoCG is to narrow down the issues that remain in dispute. This will allow the Examination to focus on the most pertinent issues. There may be other issues relevant to the five-year housing land supply which are addressed in the submissions of individual parties.

1.4 This Housing Land Supply SoCG should be read in conjunction with the submissions of participants.
2. **HOUSING REQUIREMENT**

2.1 It is agreed that the adopted housing requirement of the North Somerset Core Strategy requires a minimum of 20,985 dwellings over the period 2006 to 2026. It is agreed that this requirement was informed by an evidence base that was not NPPF compliant. Nevertheless, it is agreed that for the purposes of this examination, this housing requirement forms the appropriate starting point for assessing the five-year housing land supply.

2.2 It is agreed that the adopted housing requirement does not include any phasing mechanism, and that the introduction of such a phasing mechanism would necessitate the re-examination of the adopted housing requirement.

2.3 It is agreed that the introduction of a phased housing requirement would have significant adverse social effects in North Somerset.

2.4 It is agreed that the adopted housing requirement does not reflect the objectively assessed need for North Somerset, and that the evidence in support of the emerging Joint Spatial Plan demonstrates that the objectively assessed need is likely to be significantly greater.

2.5 It is agreed that the adopted housing requirement of 20,985 dwellings equates to an annualised requirement of 1,049.25 dwellings and that this is the correct figure to use to assess the five-year housing land supply.
2.6

3. **APPROACH TO ADDRESSING THE BACKLOG**

3.1 It is agreed that it is necessary to apply the Sedgefield approach in cases where the local planning authority has not worked with neighbouring authorities to meet the short-term housing needs. It is agreed that North Somerset Council have not worked with neighbouring authorities to do this.

3.2 It is agreed that Inspector Bore benefitted from a detailed discussion on this matter at the examination of the consequential changes to the remitted policies of the Core Strategy and concluded that it was necessary to adopt the Sedgefield approach.

3.3 It is agreed that the application of the Liverpool approach which defers meeting housing needs will have adverse social effects but that this is especially pronounced where the adopted housing requirement does not reflect the objectively assessed need.
4. **BUFFER**

4.1 It is agreed that the following housing completion figures are correct for the first 11 years of the adopted Core Strategy plan period:

<table>
<thead>
<tr>
<th>Monitoring year</th>
<th>Completions</th>
<th>Annualised Requirement</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>06/07</td>
<td>1,132</td>
<td>1,049.25</td>
<td>+83</td>
</tr>
<tr>
<td>07/08</td>
<td>1,474</td>
<td>1,049.25</td>
<td>+425</td>
</tr>
<tr>
<td>08/09</td>
<td>935</td>
<td>1,049.25</td>
<td>-114</td>
</tr>
<tr>
<td>09/10</td>
<td>772</td>
<td>1,049.25</td>
<td>-277</td>
</tr>
<tr>
<td>10/11</td>
<td>637</td>
<td>1,049.25</td>
<td>-412</td>
</tr>
<tr>
<td>11/12</td>
<td>515</td>
<td>1,049.25</td>
<td>-534</td>
</tr>
<tr>
<td>12/13</td>
<td>527</td>
<td>1,049.25</td>
<td>-522</td>
</tr>
<tr>
<td>13/14</td>
<td>760</td>
<td>1,049.25</td>
<td>-289</td>
</tr>
<tr>
<td>14/15</td>
<td>674</td>
<td>1,049.25</td>
<td>-375</td>
</tr>
<tr>
<td>15/16</td>
<td>569</td>
<td>1,049.25</td>
<td>-480</td>
</tr>
<tr>
<td>16/17</td>
<td>852</td>
<td>1,049.25</td>
<td>-197</td>
</tr>
<tr>
<td><strong>Total (1st April 2006 – 31st March 2017)</strong></td>
<td><strong>8,847</strong></td>
<td><strong>11,541.75</strong></td>
<td><strong>-2,695</strong></td>
</tr>
</tbody>
</table>

4.2 It is agreed that there have now been 9 consecutive years of under-delivery with a cumulative backlog of 2,695 dwellings using the adopted housing requirement.

4.3 It is agreed that the housing requirement has not been met in 81% of years across the plan period. It is agreed that the Local Plans Expert Group concluded that if there was under-delivery in 65% or more of years then it would be necessary to apply a 20% buffer.

4.4 It is agreed that over the period 1st April 2014 to 31st March 2017 only 67% of the housing requirement has been achieved. It is agreed that the Housing White
Paper indicates that where less than 85% of the housing requirement has been achieved over the last 3 years it is necessary to apply a 20% buffer.

4.5 It is agreed that there is a record of persistent under-delivery in North Somerset by any measure.

4.6 It is agreed that this necessitates the application of a 20% buffer in accordance with the findings of:

- Inspector Richards (at the Sandford inquiry - ED27);
- Inspector Pope (at the Banwell inquiry - ED26).

4.7 It is agreed that the Council accepted the 20% buffer to calculate their housing land supply position as recently as March 2017 as evidence in support of the following Officer Reports to Planning Committee:

- Withydale Farm, Weston Road, Congresbury; and
- Cothill, Station Road, Sandford, Winscombe.
5. **FIVE YEAR HOUSING REQUIREMENT**

5.1 It is agreed that the annualised requirement would equate to 5,246 dwellings (=20,985/20x5) over five years against the adopted housing requirement. When the backlog is added to this using the Sedgefield approach, this would produce a five-year housing requirement (without any buffer) for 7,941 dwellings.

5.2 It is agreed that with the application of a 5% buffer this produces a five-year housing requirement for 8,338 dwellings and with the application of a 20% buffer it produces a five-year housing requirement for 9,529 dwellings.
6. DELIVERABLE SUPPLY

6.1 The Council identify a deliverable supply of 8,589 dwellings made up of a variety of sources, as follows.

**Small sites with consent**

6.2 It is agreed that small sites subject to consent should be subject to a lapse rate.

6.3 It is agreed that the lapse rate of the Council has been miscalculated and misapplied.

6.4 It is agreed that it is necessary to apply a 24% lapse rate to all outstanding small sites as this is the basis upon which the lapse rate has been calculated; which results in a contribution of 475 dwellings from this source of supply.

**Large sites with consent**

6.5 It is agreed that the Council include a number of sites which are currently in continuing use in their deliverable supply. It is agreed that such sites cannot be considered to be available now, as confirmed by the NPPG (3-020), and so these sites do not meet the tests of footnote 11 of the NPPF and cannot be considered deliverable within five years. These sites consist of:

- Oxford Plasma Technology, Yatton – 51 units
- Bleadon Quarry – 42 units

6.6 The only other large site with consent which is in contention is the site at Woodborough Farm, Winscombe. The Council consider that this outline application which is subject to a holding direction from Wessex Water will achieve completions in 2018/19. It is agreed by the other parties (including the agent representing this site) that at best the average period will elapse between the grant of outline consent and the first completions (namely 3.7 years), and that this means that the site will achieve completions in 2020/21. The respective positions are that the Council considers this site will deliver 175 dwellings in five years whereas the other signatories consider that this site will deliver 80 dwellings.
Strategic Sites

6.7 The Council consider that the Weston Villages Strategic Sites will contribute 3,036 dwellings in five years. The other signatories consider that these sites will contribute 2,321 dwellings in this period in accordance with the evidence provided by the respective developers.

Local Plan Allocations

6.8 The Council consider that saved Local Plan allocations which are not yet subject to planning consent will contribute 239 dwellings to the deliverable supply.

6.9 It is agreed that all of the outstanding Local Plan allocations require a sequential flood risk and exceptions test prior to the grant of permission. The other signatories consider that in the absence of this these sites cannot be demonstrated to be suitable now and so do not meet the tests of footnote 11 such that they cannot be considered to be deliverable within five years.

6.10 Furthermore, it is agreed that the site at Orchard House is not deliverable as it is subject to a ransom strip and so is not available in terms of footnote 11 of the NPPF.

6.11 It is agreed that the site at Westacres Caravan Park is not deliverable as it is subject to probate, it has previously been unsuccessfully marketed, and it has viability issues.

6.12 It is agreed that the site at Land to the east and west of Wemberham Lane is not deliverable within five years in accordance with the evidence of the development interest.

Emerging Allocations

6.13 The five-year land supply position presented in the SoCG assumes that all of the allocations in the submission version of the Sites and Policies Plan: Part 2 will be found sound. However, the soundness of individual allocations will be discussed throughout the course of the examination. If any are found to be unsound these will need to be deleted from the deliverable supply accordingly.
6.14 The Council consider that emerging allocations will contribute 2,002 dwellings to the deliverable supply.

6.15 The other signatories consider that the average lead-in times between the validation of an outline application and the first completions (5.5 years) mean that the emerging allocations which are not yet subject to applications may not contribute to the deliverable supply, unless there are site specific factors which mean the site may deliver sooner than average. This applies to the majority of emerging allocations.

6.16 It is agreed that those emerging allocations which require a sequential flood risk and exceptions test cannot be demonstrated to be suitable now and so cannot be considered deliverable in terms of footnote 11. These consist of the following sites:

- Millcross Site, Clevedon – 70 units in five years
- Land north of Churchill Avenue, Clevedon – 44 units in five years
- Yeolands Farm, Clevedon – 0 units in five years
- South West of Severn Paper Mill, Portishead – 70 units in five years
- Former Weston Library and adjacent BT building, Weston-super-Mare – 0 units in five years
- Land to the west of Winterstoke Road, Weston-super-Mare – 70 units in five years
- Gas Works, Weston-super-Mare – 0 units in five years
- Land to the rear of Locking Road, Weston-super-Mare – 24 units in five years
- Station Gateway, Weston-super-Mare – 300 units in five years
- Mead Vale Shopping Centre, Weston-super-Mare – 40 units in five years
- Former Bournville School, Weston-super-Mare – 45 units in five years
6.17 It is agreed that the Council include a number of sites which are currently in continuing use in their deliverable supply. The other signatories consider that such sites cannot be considered to be available now, as confirmed by the NPPG (3-020), and so these sites do not meet the tests of footnote 11 of the NPPF and cannot be considered deliverable within five years. These sites consist of:

- Former Sweat FA site, Weston-super-Mare – 45 units in five years
- Jackson Barstow House, Uphill – 0 units in five years

- Station Gateway, Weston-super-Mare – 300 units
- Mead Vale Shopping Centre, Weston-super-Mare – 40 units

6.18 It is agreed that the Millcross site is not available now given that the NHS have identified that a decision still has to be made on the future of this site (as confirmed in FRW-1), and accordingly that it is not deliverable within five years according to the tests of footnote 11.

6.19 It is agreed that given the scale of the site at Land at Engine Lane and the level of objections to be resolved, this is likely to take at least the average lead-in time (5.5 years from the validation of an outline application) until the first completions are achieved.

6.20 It is agreed that given the scale of the site at North West Nailsea, the number of landowners, and the significant infrastructure requirements, this is likely to take at least the average lead-in time (5.5 years from the validation of an outline application) until the first completions are achieved.

6.21 It is agreed that the site at Land to the rear of Locking Road is no longer deliverable as it is not being promoted through the Sites and Policies Plan and the owner has informed their consultant (Pegasus Group) that they intend to retain this in its current use.

6.22 It is agreed that the remediation of the site at Land south of Herluin Way (a former landfill site) will be extensive and as such this is likely to take at least the average lead-in time (5.5 years from the validation of an outline application) until the first completions are achieved.
Small site windfall allowance

6.23 It is agreed that it is appropriate to include an allowance for 107 dwellings arising from small site windfalls in the five-year period.

Change of use of rural buildings

6.24 It is agreed that there is a finite supply of rural buildings that benefit from permitted development rights.

6.25 The Council consider that the average number of such approvals will continue indefinitely and that all of these will be developed, with 180 dwellings contributing to the deliverable supply.

6.26 It is agreed that the current downward trend of such applications should be taken into account and an appropriate lapse rate applied, which produces a contribution of 23 dwellings from this source of supply.

Empty homes

6.27 It is agreed that the contribution of empty homes to the deliverable supply has not been robustly examined in North Somerset previously as required by the NPPG (3-039).

6.28 It is agreed that the contribution of this source of supply could become eligible for inclusion if it was robustly examined through this examination.

6.29 The Council consider that 112 long-term empty homes could be brought back into use in the five-year period without any others becoming long-term vacant.

6.30 It is agreed that as North Somerset already has one of the lowest levels of long-term vacancies nationally, and that long-term vacancies arise (or exist) regardless of action taken by a local authority, that any contribution from this source of supply would be negligible.

Total deliverable supply

6.31 The individual components of the deliverable supply are set out in the schedule at the end of this SoCG. However, the respective positions of the Council and the other signatories are set out in Table 6.1 on each of the sources of supply.
### Table 6.1: Sources of Supply

<table>
<thead>
<tr>
<th>Source of supply</th>
<th>Council’s position</th>
<th>Other signatories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small sites with consent</td>
<td>578</td>
<td>475</td>
</tr>
<tr>
<td>Large sites with consent</td>
<td>2,335</td>
<td>2,147</td>
</tr>
<tr>
<td>Strategic sites</td>
<td>3,036</td>
<td>2,321</td>
</tr>
<tr>
<td>Local Plan allocations</td>
<td>239</td>
<td>0</td>
</tr>
<tr>
<td>Emerging allocations</td>
<td>2,002</td>
<td>592</td>
</tr>
<tr>
<td>Small site windfall allowance</td>
<td>107</td>
<td>107</td>
</tr>
<tr>
<td>Change of use from rural buildings</td>
<td>180</td>
<td>23</td>
</tr>
<tr>
<td>Empty homes</td>
<td>112</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>8,589</strong></td>
<td><strong>5,665</strong></td>
</tr>
</tbody>
</table>
7. FIVE YEAR HOUSING SUPPLY

7.1 Based on the preceding areas of common and uncommon ground, it is agreed that the current five-year housing land supply positions are as set out in Table 6.2.

Table 6.2: Five-year land supply scenarios

<table>
<thead>
<tr>
<th></th>
<th>Five year requirement with 5% buffer (8,338)</th>
<th>Five year requirement with 20% buffer (9,529)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deliverable supply according to the Council (8,589)</td>
<td>5.15 years Surplus of 251 dwellings</td>
<td>4.51 years Shortfall of 940 dwellings</td>
</tr>
<tr>
<td>Deliverable supply according to the other signatories (5,665)</td>
<td>3.40 years Shortfall of 2,673 dwellings</td>
<td>2.97 years Shortfall of 3,864 dwellings</td>
</tr>
</tbody>
</table>