

North Somerset Council

Report to the Placemaking, Economy and Planning Policy and Scrutiny Panel

Date of Meeting: 19 November 2024

Subject of Report: North Somerset Local Plan – additional development sites

Town or Parish: All

Officer/Member Presenting: Michael Reep, Planning Policy Manager

Key Decision: Yes

Reason: The local plan will have a potentially significant effect on communities living and working in the whole council area

Recommendations

It is recommended that the Panel:

1. Endorses the sequential approach to the identification of additional development sites.
2. Considers the proposed approach and makes any recommendations to Executive Committee with regard to potential locations, issues and implications to consider.

1. Summary of Report

- 1.1 The new local plan for North Somerset commenced in 2020 and following three stages of consultation, the Pre-submission (Reg 19) version was published for consultation in November 2023 followed by a revised Reg 19 version approved in July 2024.
- 1.2 On 30 July 2024 the government announced a consultation on changes to the National Planning Policy Framework. This had significant implications for the North Somerset Local Plan in that it proposed a new mandatory standard method housing requirement, and a more relaxed approach to Green Belt protection.
- 1.3 The decision was taken to pause progress on the Reg 19 version pending an assessment of potential additional housing and other allocations. The shortfall in the 15 year housing requirement between the Reg 19 supply figure and the new standard method housing target is currently 8,530 dwellings. This is a minimum and may increase if the plan is delayed or additional supply is required to provide additional flexibility.

- 1.4 The assessment of the potential new allocations needs to be undertaken using a robust methodology. The proposed approach uses the local plan’s existing spatial strategy and sequential approach but reflecting the government’s proposed approach to Green Belt.
- 1.5 The scale of the housing challenge means that many more locations identified as having potential through the Strategic Housing Land Availability Assessment and outside areas at risk of flooding will need to be considered.

2. Policy

- 2.1 The Local Plan will provide the land use framework for the delivery of the key aims and priorities of the Corporate Plan, including measures to help address the climate emergency and nature emergency.
- 2.2 The planning system is plan-led and local authorities must prepare up-to-date local plans to provide a positive vision for the future of the area; a framework for addressing housing needs, and other economic, social and environmental priorities and a platform for local people to help shape their surroundings.
- 2.3 Local Plans must be kept up to date and reflect government guidance. The existing Local Plan which consists of the Core Strategy, Site Allocations Plan and Development Management Plan covers the period to 2026. This is currently being reviewed and updated. The new Local Plan will now cover a fifteen-year time frame from 2025-2040.
- 2.4 The government consulted on proposed changes to the National Planning Policy Framework (NPPF) July - September 2024. If confirmed, the revised NPPF will have significant implications for the local plan, in particular in relation to the need to identify additional development locations and the approach to Green Belt.

3. Details

- 3.1 The new local plan for North Somerset commenced in March 2020. Initial stages of consultation in 2020 were followed by a draft plan (Preferred Options) in March 2022, a first Pre-submission (Reg 19) version which was consulted upon between November 2023 – January 2024 and a revised Reg 19 approved in July 2024. The housing requirement in the revised Reg 19 was based on a locally derived target of 14,902 dwellings 2025-2040 and the plan identified a supply of 15,275 dwellings. The broad distribution of housing as proposed in the Reg 19 local plan is summarised in Policy SP8 as follows.

Location	Dwellings	Proportion of housing supply
Weston-super-Mare	6,984	46%
Wolvershill (north of Banwell)	2,800	18%
Clevedon	479	3%
Nailsea	988	6%
Portishead	727	5%
Villages and rural areas	3,297	22%
Total	15,275	100%

- 3.2 The government commenced consultation on a new NPPF on 30 July 2024 with the objective of boosting housing supply and economic growth. This proposed increasing the housing target and to make it mandatory and relaxed the protection given to Green Belt when addressing housing need. Local planning authorities will be expected to make all efforts to allocate land to meet the standard method requirement. It may be possible to justify a lower target on the basis of constraints such as protected habitats and flood risk areas but this will need to be evidenced and justified through consultation and examination. 'All local planning authorities will need to demonstrate they have taken all possible steps, including optimising density, sharing need with neighbouring authorities and reviewing Green Belt boundaries, before a lower housing requirement will be considered' (MHCLG consultation document 30 July 2024 'Proposed reforms to the NPPF and other changes to the planning system' chapter 3, paragraph 6).
- 3.3 It is not disputed that there is a high level of housing need in North Somerset. The most recent median ratio of house prices to annual earning is 9.47, based on 2020 figures for average house price within North Somerset and the average earnings for jobs within the area. The waiting list for affordable housing is approaching 3,000 homes. However, notwithstanding this and a general recognition of need, housing allocations remain highly sensitive and often generate significant opposition from local communities.
- 3.4 In her letter to local authorities ('Playing your part in building the homes we need' 30 July 2024) Angela Rayner stated that:

The Government is committed to taking action to ensure authorities have up-to-date local plans in place, supporting local democratic engagement with how, not if, necessary development should happen. On that basis, and while I hope the need will not arise, I will not hesitate to use my powers of intervention should it be necessary to drive progress – including taking over an authority's plan making directly.

The clear message from government is that local planning authorities are expected to meet the new standard method targets and that local communities should not expect to be able to block development.

- 3.5 The proposed housing requirement for North Somerset is 1,587pa or 23,805 dwellings over a 15 year period. This annual requirement is significantly more than the North Somerset average of 891 dwellings pa (1981-2024) and higher than has ever been delivered in one year (the most was 1,474 in 2007/08). The figure is a minimum and we will be expected to demonstrate that there is headroom should sites not come forward as anticipated and to provide flexibility and choice. There is also likely to be pressure to contribute to meeting the unmet needs of neighbouring authorities, particularly Bristol, although all councils are in the same position in terms of struggling to meet the new housing targets. The shortfall of 8,530 dwellings is in relation to the period 2025-2040. As plans need to cover a 15 year period, there is the possibility that delays to the plan may require the need to identify an additional year's worth of supply.
- 3.6 The proposed amendments to the NPPF contained advice that where a local plan was at Reg 19 stage but was more than 200 dwellings pa below the new government target (as is the case in North Somerset), the plan must identify additional housing capacity and had 18 months in which to do it. It was therefore decided to pause the

plan pending the assessment of additional sites. Following the identification of, and public consultation on, additional sites to address the shortfall, the new allocations would be added to the Reg 19 plan which, following approval by Executive Committee, would be subject to further consultation and submission for examination.

- 3.7 The existing local plan spatial strategy has been developed and refined through the plan making process from the initial consultations on Challenges and Choices for the Future (2020), the draft plan (Preferred Options 2022) and the Reg 19 versions in 2023 and 2024 and tested through the Sustainability Appraisal. A strategy which focuses most new growth well-related to existing centres is more effective and efficient in terms of delivering supporting facilities and infrastructure (such as schools or shops) than a more dispersed approach. The plan's existing spatial strategy as set out in Policy SP4 remains fit for purpose.

Policy SP4: Spatial Strategy

Priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel, particularly at locations which are currently, or have the potential to be, well served by public transport. Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised. Residential development in areas at risk of flooding will be minimised outside the towns. The amount of development at villages and in the countryside will relate to local community needs.

This reflects the requirement to deliver sustainable patterns of development by ensuring that priority is given to brownfield sites at the towns, then development well related to the urban areas and finally development at the largest villages.

SHLAA potential

- 3.8 The starting point when considering additional development sites is the Strategic Housing Land Availability Assessment (SHLAA). This contains a map and schedule of all sites put forward by developers and landowners for housing, employment and other uses and is used to identify allocations in local plans, or where additional capacity is required. Other sites can be considered, but these need to be able to demonstrate a reasonable prospect of delivery.

Discounting sites

- 3.9 The government consultation uses the term 'hard constraints' to refer to the most important constraints, including land at risk of flooding. This is consistent with our chosen North Somerset approach of avoiding flood risk areas both in terms of addressing the implications of climate change and delivering sustainable development but also because the mitigations needed to make the development safe are expensive, impacting on viability and the scope for full contributions to affordable housing and infrastructure. As an example, the Strategic Flood Solution at the Weston Villages (Parklands Village and Haywood Village) cost c. £10m, with further costs of around £5,000 – 6,000 per home for piling and required raising of ground levels. Those sums date from over 10 years ago and will have increased with inflation since then. In addition, such flood mitigation requires ongoing maintenance.
- 3.10 The schedule of SHLAA sites is refined by discounting those sites affected by primary (hard) constraints. These are:

- Existing and future fluvial and tidal flooding (outside the towns).
- Mendip Hills National Landscape.
- Site of Special Scientific Interest.
- European sites – RAMSAR, SAC, SPA.
- Ancient Woodland.
- National Nature Reserve.
- Local Nature Reserve.
- Scheduled Monument.
- Registered Park and Garden.
- Regionally Important Geological Site.

Sites may also be inappropriate for development and therefore discounted for other site-specific reasons. This leaves a pool of potential development locations to be considered as potential allocations.

Application of the sequential approach

- 3.11 The local plan process has extensively investigated potential opportunities for brownfield sites, urban intensification and increasing densities. These will continue to be assessed but it is not anticipated that these will deliver a significant amount of additional capacity beyond that currently identified. Instead, the focus of this work must be on identifying a robust approach to site selection which can be justified at examination. The larger, most sustainable villages which either contain a relatively good range of facilities, services, jobs and public transport or are well-related to higher order settlements which do, are identified as Backwell, Banwell, Bleadon, Churchill/Langford, Long Ashton, Pill/Easton-in-Gordano, Sandford, Winscombe, Wrington and Yatton/Claverham.
- 3.12 The proposed NPPF changes still emphasise the importance of Green Belt but require that Green Belt locations must be considered when addressing housing needs. This means that sequentially it is important to continue to prioritise sustainable locations outside the Green Belt, but Green Belt should be considered if insufficient capacity can be found at non-Green Belt locations.
- 3.13 The NPPF changes also introduce the concept of ‘grey belt’ which is defined as ‘land in the Green Belt comprising previously developed land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes’. The proposed new NPPF states that ‘development plans should give first consideration to previously developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously developed, and only then consider other sustainable Green Belt locations’ (paragraph 144). It is proposed that when considering sites through the sequential approach that priority is given to grey belt sites both when considering sites well related to the towns, and also the larger villages.
- 3.14 A review of densities and any additional opportunities within the urban areas will be undertaken, but additional green field sites will be required. These will be in addition to the housing sites identified in the current Reg 19 local plan.
- 3.15 The schedule of sites considered, locations and indicative capacities can be viewed on the Local Plan web pages (a link is provided in the background papers). This also indicates which sites fall within which category for the purposes of the

sequential assessment. This set of sites and capacities will be subject to ongoing review ahead of consultation in the new year.

- 3.16 This additional housing supply will be assessed through the following steps:
1. Sites outside the Green Belt, but well related to the towns.
This comprises sites being promoted on the edge of Weston-super-Mare, including around Hutton and Locking (about 500 dwellings in total) and sites generally to the south and west of Nailsea (about 1,400). The combined capacity of all potential sites in this category is around 1,900 dwellings.
 2. Sites outside the Green Belt, but well related to the larger villages.
There are a large number of sites put forward at the larger villages outside the Green Belt with a combined capacity of around 1,400 dwellings.
 3. Sites in the Green Belt well related to the towns, including Bristol.
This includes sites proposed at Clevedon (around 20 dwellings), Portishead (about 650 dwellings), Nailsea (about 550 dwellings) and at South West Bristol (about 4,200). This is a total of around 5,400 dwellings.
 4. Sites in the Green Belt well related to the larger villages.
Sites are proposed at Backwell (around 850 dwellings), Pill/Easton-in-Gordano (about 1,100 dwellings), Long Ashton (about 1,000) and Wrington (around 200 dwellings). This is a total capacity of about 3,300 dwellings.
 5. Elsewhere.
There are a large number of sites which have been promoted in relatively less sustainable smaller villages and rural locations, both outside and within the Green Belt. These include locations such as Failand and Flax Bourton.
- 3.17 Given the need to meet a shortfall of a minimum of 8,530 dwellings it is evident from an initial high level assessment of the SHLAA potential that numerically there is sufficient capacity to address the shortfall and that this is capable of being found in the first four sequential steps ie without needing to consider relatively less sustainable locations such as smaller villages or rural areas, and without using areas at risk of flooding.
- 3.18 There will still be some choice as not all sites will necessarily be suitable for development, but the broad principle is that there is a need to assess all opportunities in the first sequential step before considering the next, and so on, until sufficient capacity is identified. The assessment of individual sites will take into account factors such as access, drainage, landscape impact and heritage and ecology issues. However, there will also be a need to review the overall package of sites to consider cumulative impacts and to ensure that objectives such as in terms of delivery, providing an appropriate type and mix of sites and infrastructure provision are addressed.
- 3.19 The additional housing will increase the population of working age and therefore the need for additional job opportunities. Work is being undertaken to understand what the implications might be for employment land supply. The revised Reg 19 local plan identified a supply of 60ha against a demand of 50ha to provide some flexibility and choice and to respond to the needs of the market. Additional employment land is likely to be required either in association with strategic development or other opportunities.

Identifying additional capacity

- 3.20 Identifying additional growth using the sequential approach is likely to involve a return to the Preferred Options strategy which focussed development at three strategic locations – Weston (Wolvershill), Nailsea/Backwell and South West Bristol.
- 3.21 Nailsea/Backwell has significant highway constraints as recognised at the Preferred Options stage and further work is required to identify what transport mitigations are required and how they might be delivered. In particular this relates to improved accessibility between Nailsea and the A370 involving a crossing of the railway.
- 3.22 Elsewhere there are known capacity concerns at J19 of the M5 which could impact on the scale of any proposed growth in the area. Clearly further work on transport and other constraints, including infrastructure delivery may impact on the preferred package of sites. Transport measures in particular can be very expensive and unless external grant is secured are likely to detract from funding available for other measures such as affordable housing and community facilities.
- 3.23 A future report to Executive is expected to set out a preferred set of sites for consideration and the basis for public consultation in the new year. The Panel is invited to make any recommendations to Executive Committee on the proposed methodology and appropriate locations for development.

4. Consultation

- 4.1 The Placemaking, Economy and Planning Policy and Scrutiny Panel has been closely engaged in the preparation of the new local plan. The response to this report will help to inform the Executive Committee's decision on the approach to identifying additional capacity.
- 4.2 Public consultation on the potential additional sites is anticipated to take place in the new year. The response will be considered, and the revised Reg 19 plan further amended prior to approval by Executive Committee for a final 6 week period of public consultation on the soundness of the plan which will identify the issues to be addressed at the examination.
- 4.3 Engagement with local communities, stakeholders and neighbouring authorities is integral to the plan making process at each stage. A Consultation Statement is prepared highlighting the issues raised at each stage of consultation. The outcomes of the consultation which has taken place and how that has shaped the plan will form part of the evidence submitted for examination.

5. Financial Implications

- 5.1 Local plan preparation is funded from existing budgets. This report does not approve the costs associated with preparing the Local Plan and supporting evidence, this will be subject to separate approvals through our delegated decision making process.

Costs

The cost of preparing the Local Plan, including the supporting evidence, was reported in July 2024 to be around £1,130,000 over 6 years. This included the

transport evidence and the costs of the examination process, including the inspector's fees.

Funding

The plan is progressed using existing budgets and reserves.

Costs associated with the delivery of growth

- 5.2 Delivery of housing and employment sites allocated through the Local Plan will have financial implications, whether income (for example Business Rates, CIL) or costs relating to the provision of infrastructure and services. This will need to be considered as part of site selection and delivery planning.

6. Legal Powers and Implications

- 6.1 The Local Plan is being progressed under the Town and Country Planning Act 1990 (as amended) and related Regulations. There is a requirement for all local planning authorities to have an adopted local plan in place.

7. Climate Change and Environmental Implications

- 7.1 The new local plan will play a significant role in defining and delivering the Council's response to the climate emergency. It will set out the approach to climate change and environmental issues in terms of, for example, the location and form of development, renewable energy, minimising car use, encouraging green infrastructure and biodiversity, avoiding sensitive areas such as areas at flood risk and minimising waste.

8. Risk Management

- 8.1 The absence of an up-to-date development plan incurs risks related to the uncertainty of future investment decisions and speculative development proposals with the potential risk of an increased number of planning appeals and less sustainable development solutions.

9. Equality Implications

- 9.1 An Equalities Impact Assessment is prepared at each stage of the plan.

10. Corporate Implications

- 10.1 The new Local Plan will help support the delivery of the Corporate Plan vision and objectives and has significant implications for a wide range of Council services in terms of, for example, the future location of population, jobs and supporting infrastructure.

11. Options Considered

- 11.1 The government's position is clear that local planning authorities are expected to address the standard method housing target. The alternative would be to do nothing

and wait for confirmation of the NPPF changes expected at the end of 2024. This could result in additional delay to the plan.

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Appendices:

None.

Background Papers:

North Somerset Local Plan – new Pre-submission Reg 19 version; Report to Executive 17 July 2024.

[Committee Report NSC](#)

The local plan webpages provide links to the supporting evidence and other information.

[Pre-submission plan 2040 \(reg 19\) – July 2024 | North Somerset Council](#)

Proposed reforms to the NPPF and other changes to the planning system MHCLG 30 July 2024.

[Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK](#)

Proposed changes to the NPPF 30 July 2024.

[National Planning Policy Framework: draft text for consultation](#)

North Somerset Strategic Housing Land Availability Assessment.

[Strategic Land Availability Final Report](#)