28th February 2014

Delivered by email and post

North Somerset Council
Planning Policy and Research
Post Point 15
Town Hall
Walliscote Grove Road
Weston –super-mare
BS23 1UJ

FAO: David Robins – Principal Planning Officer

Dear Sirs,

NORTH SOMERSET CORE STRATEGY: SUSTAINABILITY APPRAISAL SUPPLEMENTARY REPORT REVISED POLICY CS13 PUBLIC CONSULTATION: FEBRUARY 2014

I write with regard to the above consultation document and I set out in this letter representations on behalf of my Client, Persimmon Homes (Severn Valley) Ltd.

In particular, these representations have direct regard to the land that Persimmon Homes control at Weston-super-Mare, Clevedon, Nailsea, Portishead, Backwell, Long Ashton and Yatton. These representations should also be read alongside the representations made to the Remitted Policies Consultation that we made in January 2014 on behalf of Persimmon Homes (Severn Valley) Ltd.

We have concerns with regard to the timing of the Appraisal and how it has informed the proposed housing requirement figure. The Supplementary Sustainability Appraisal (SA) was published following the publication of the remitted policies which could suggest that the Council’s preferred option may not be fully informed by the overall SA process.

The report from Edge Analytics identifies nine potential housing requirement scenarios, of which only four were appraised in the Supplementary SA. The Supplementary SA fails to provide sufficient justification as to why the remaining scenarios were discounted from the appraisal. The Report suggests that the four highest Edge Analytics scenarios have been discounted as undeliverable over the remaining plan period. However, at the point of initiation, the Supplementary SA should not be able make this assumption unless pre-empted policy and political constraints have been applied. It is our view that the Supplementary SA should appraise all nine scenarios to fully and comprehensively inform the Council’s preferred option.
Please find set out below our comments in relation to specific sections of the Sustainability Appraisal Supplementary Report:

**Comments on the Sustainability Appraisal Supplementary Report**

**PART II: ANALYSIS**

**Section 5: Identifying the strategic options**

**Task B1**

This section relates to the testing of the plan objectives. The Supplementary SA states that it is not directly relevant in this case. Priority Objective 1 relates to the delivery of sustainable housing development to meet housing need through the provision of the housing requirement. The adopted Priority Objective 1 references the previous housing requirement of 14,000 but this is a flawed requirement thus justifying a review of the plan’s objectives.

It also states at Paragraph 5.1 that the SA will assess possible housing numbers to feed into the objective, rather than ways of meeting it. To increase the housing requirement a robust assessment and exploration of how the requirement can be met along with alternative options must be undertaken, including a sustainability appraisal.

**Task B2**

Task B2 relates to developing the Core Strategy options. The ODPM guide recommends that broad strategic options are considered as opposed to detailed policy wording variants and those options need to be distinctly different.

It is correct to assess different housing requirement figures but the full range of objectively assessed strategic options are not being fully considered and assessed by the SA and therefore it is not robust.

As stated above, there is no justification for discounting the top 4 scenarios put forward by Edge Analytics. As argued in our previous representations (to the Remitted Policies consultation, Jan 2014) the figures appraised in the supplementary SA fall short of the objectively assessed requirement and should cover a range up to 25,950. Therefore the Supplementary SA should be revised to assess this higher range.

At Paragraph 5.8 it states:-

"It is also the case that if a high housing figure in this Core Strategy exhausts the possibilities for locating development sustainably within North Somerset, this will make any replacement plan unsustainable if it too has to accommodate a growing population."

It is the role of the plan making process to assess the need now and for the forthcoming plan period and provide a robust plan to meet that need. This current plan making process is not the place to consider any replacement plan or second guess what the situation may be at that time.

**Table 2: Comparison of 2011 and 2014 options**

Table 2 states that in 2011 achievability of a requirement of 26,800 was doubted given the lead-in times and infrastructure requirements of large strategic sites. In our view other options which include the delivery of housing through an increased number of smaller sites, without the need for major infrastructure investment should also be investigated. There is no need to rely solely on large strategic sites. The delivery
of housing through an increased number of smaller sites could help achieve an higher requirement with a
greater certainty in deliverability, maintaining a five year housing land supply.

The Table notes that a completion rate of 1,000 dwellings pa has not been achieved any time during the
recession and only 7 times in the past 20 years, and this would need to be delivered for the ‘high’ option put
forward by Edge Analytics. However, the policy context didn’t require annual completions at that rate so the
rate over the last 20 years has been constrained by the policy context. As noted in our recent
representations the industry is more than capable of delivering enough houses to meet the objectively
assessed need. Houses can now be built in 16 weeks rather than 26 previously and in addition mortgage
lending and bank funding towards development has increased since the recession.

The Council should have more concern with meeting the proposed housing requirement and maintaining a
five year housing supply due to the impact of the 1.5 jobs per dwelling requirement at Weston-super-Mare
and Weston Villages (as set out under Policy CS20 and CS30). The Council are relying on Weston-super-
Mare as being the focus for strategic development to deliver much needed housing. The Council should be
applying Government Policy to provide a significant boost to housing supply without applying an
employment policy constraint.

Table 4: Appraising Table Summary for Policy/Appendix 1

Whilst discounting Option A (as this requirement figure has been found unsound)there is only one score in
the above table which rates Options B higher than C and D. Option B scores more positively than option C
and D under SA Objective EC2: harness the particular economic opportunities of North Somerset. The
reason given is that Option B will provide housing growth which will proceed in line with expected
employment growth. However, the Edge Analytics evidence base itself demonstrates that this level of
housing growth will fall far short of meeting the Council’s objective of achieving an additional 10,100 jobs
over the plan period.

There also appears to be other errors in the scoring process. A key example of this is Objective SC1: Meet
local needs locally where Option B, C and D have been rated equally. It is known that the higher the growth
option (i.e. the higher the housing requirement) the greater level of affordable housing provision which can
meet the local affordable housing need. Consequently the scoring should be rated more positively the
greater the growth option. Additionally, as detailed in our previous representations it is clear the objectively
assessed housing need for North Somerset falls within the 22,950-25,950 and therefore the four options
assessed in the Supplementary SA do not meet the housing requirement (Objective SC10) and should not
be rated positively.

Task B3- predicting effects

Paragraph 6.5 claims that high growth options (C and D) fail to deliver sustainable development because
the risk is that housing exceeds the locally available employment resulting in increased out-commuting
and/or a growing proportion of the population not working, being unemployed or retired. However, with an
increase in housing and consequently an increase in labour force and skill set increased labour will be
generated and attracted to the area. Therefore the goal of more self-contained and self-supporting
communities is more likely to be achieved through a higher housing requirement provided employment land
is also brought forward. However, if the housing delivery at Weston-super-Mare and Weston Villages
remains restrained by the 1.5 jobs per dwelling requirement (as set out in CS20 and CS30) the necessary
numbers of new houses will not be delivered and the plan as a whole will be compromised. This
demonstrates a need to re-assess Policy CS30 and thereby review the respective implications for Policy
CS20 at the same time as re-assessing the housing requirement, due to the direct linkages between them.
Paragraph 6.8 discusses new homes meeting the demands for housing that are not being satisfactorily met within the existing stock. It states that deficiencies may be quantitative in relation to meeting household formation or qualitative in respect of specific housing suitable for elderly, disabled and large families. The report states that some demand is for those relocating to North Somerset and goes on to say that building homes will not guarantee local residents will obtain access to that supply. However, this is a moot point unless the Council is going to restrict the use of homes to certain occupants. No matter what scale of private housing you build there is no guarantee that local residents will obtain priority unless occupation is restricted in some way. Consequently with a greater scale of housing there comes a greater opportunity for local residents to access the new provision of housing, and increased provision of affordable housing which is reserved for people with local connections.

Paragraph 6.8 comments about increased sales to retired in-migrants, outbidding prospective purchasers from within North Somerset. The retired population should not be excluded because of their circumstances, particularly and because one of the Core Strategy’s Objectives is to make provision for the needs of an ageing population. The plan should therefore positively enable this and this should be accordingly taken into account in the SA.

**Population Numbers/Distribution**

Paragraph 6.10 states that as the submission of the Core Strategy occurred before the ‘duty to co-operate’ came into force it is based on meeting locally arising housing needs and makes no provision for ‘overspill’ from adjoining areas. It goes on to state that the duty will apply to any future review. However, not meeting objectively assessed need in full means that population will also be displaced from North Somerset.

Paragraph 6.11 addresses the rate at which non-renewable resources are consumed. It states that with increased housing there will be a move away from sustainability in environmental terms. However, if the aim is to be sustainable there must be a balance between economic, social and environmental matters. Not accommodating the full objectively assessed housing need will not meet the social and economic elements of sustainability.

**Housing Affordability**

As detailed in our previous responses it is important that the 2015 SHMA is taken into account

Paragraph 6.13 states that increased supply reduces house prices and improves affordability, improved affordability in turn reduces need. The Council argues that the supply would have to be increased across the country to achieve these positive effects and just increasing supply across a HMA alone or within a single local authority would have little impact. However, these comments justify why North Somerset along with neighbouring authorities and others across the country should be significantly boosting their supply in accordance with the NPPF, with the aim of achieving improved affordability.

**Task B4- Evaluating Effects**

At Paragraph 6.26 the Report states that too high a housing requirement would produce “the worst of all worlds- stalled regeneration on urban brownfield sites plus development on rural greenfield sites that could stall at an inconvenient point in the delivery of necessary associated infrastructure”. Potentially regeneration on urban brownfield sites can occur at any point time. The Council needs to continue to ensure that it is viable for these sites to be regenerated. If they are viable, developers will develop them when the market indicates it is right to do so. There is a demonstrated need for a higher requirement figure to be delivered through both green and brownfield sites to ensure there is flexibility and choice, to meet the objectively assessed need and maintain a five year housing requirement.
Task B5- Mitigating/Maximising Effects

Paragraph 6.28 explains that the Core Strategy should be read as a whole as mitigation measures are contained within other policies. Paragraph 6.29 goes on to state that housing numbers as such do not allow for mitigation as this is done through other policies that specify how the numbers are to be delivered. This is the reason why the other remitted policies within the Plan should also be reviewed at this stage, along with the housing requirement to ensure it is sound.

We look forward to confirmation of receipt of these representations and having an on-going dialogue with the Council on these matters.

Yours sincerely

[Signature]

Peter Stacey
Director