



## **North Somerset Council**

### **Town and Country Planning Act 1990 Section 78**

**Appeal by Mead Realisations Ltd against the decision of North Somerset Council to refuse planning application 20/P/1579/OUT for a residential development of up to 75no. dwellings and associated infrastructure with access for approval, and appearance, scale, layout and landscaping reserved for subsequent approval on land at Lynchmead Farm, Ebdon Road, Wick St Lawrence, Weston-super-Mare**

**Planning Inspectorate reference: APP/D0121/W/22/3313624**

**Local Planning Authority reference: 20/P/1579/OUT**

**Proof of Evidence of Marcus Hewlett**

**Appendices**

**April 2023**

## CONTENTS

- MH1: **SHLAA chronology** – *explanation of the latest SHLAA preparation stages to provide background to the relevant land availability evidence.*
- MH2: **Assessment of sites** – *this analysis is relevant to Main Issue 1 and the consideration of whether there are suitable alternative sites at a lower risk of flooding.*
- MH3: **Analysis of appeal proposal against Sustainability Appraisal objectives** – *this analysis is relevant to Main Issue 2 and the consideration of whether there are wider sustainability benefits of the proposal that outweigh the flood risk.*

**Appendix MH1: Chronology of Strategic Housing Land Availability Assessment (SHLAA)**

Table MH1a: SHLAA chronology of documents produced during preparation of local plan		
Publication package/ Document name	Publication	Scope
<ul style="list-style-type: none"> <li>• SHLAA Interim Report</li> <li>• Interactive sites map</li> </ul>	November 2020	An Interim Report was published in November 2020 alongside the North Somerset Local Plan 2038 'Choices for the Future' Consultation <sup>1</sup> . This informed preparation of broad spatial strategy approaches within the Choices document, and took into account the site submissions received through the call for sites in the summer of 2020.
<ul style="list-style-type: none"> <li>• SHLAA Second Interim Report</li> <li>• SHLAA Second Interim Report: Sites Schedule</li> <li>• Interactive sites map</li> </ul>	April 2021	A Second Interim Report that updated and superseded the Interim Report including further sites, and additional analysis of sites against constraints. The Second Interim Report was published in April 2021 including site mapping. Published as background to the report to NSC Executive in April 2021. The Second Interim Report provided a baseline assessment of all sites and provided context for next stage of more detailed site assessment in context of preferred spatial strategy.

<sup>1</sup> Consultation ran from 2 November 2020 to 14 December 2020.

		<p>Identified where further work would still be required in relation to the investigation of additional relevant aspects e.g. transport implications of specific sites, overcoming identified constraints and assessing site achievability, availability and deliverability, the scope of which was indicated in the Next Stages at the end of the report.</p>
<ul style="list-style-type: none"> <li>• Draft SHLAA Main Report</li> <li>• Draft SHLAA Place Templates</li> <li>• SHLAA Urban area schedules</li> <li>• SHLAA Village schedules</li> <li>• Interactive sites map</li> </ul>	<p>January 2022 – <i>This is the latest SHLAA publication provided in CD8.19 to CS8.22.</i></p>	<p>Published as background evidence to the Preferred Option consultation draft in the Spring of 2022. Documented outputs from further site assessment carried out in the context of the preferred spatial strategy and locations identified in a report to the Council’s Executive April 2021.</p> <p>From the wider list of sites published in the Second Interim SHLAA, a methodology was used to identify those areas and sites that should be considered in greater detail as potential candidates compatible with the spatial strategy. In summary a series of Broad Locations were identified around the urban areas that acted as areas of search for potential sites. Similarly, areas of search were</p>

		identified around the more sustainable villages and together, these areas of search formed the reference point for the more detailed assessment of SHLAA sites within. Sites outside of these areas of search were not assessed in further detail.
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**Appendix MH2:** Schedule of sites based upon appellant’s schedule set out in Appendix 1 to their Statement of Case

Appendix MH2 updates the interim site assessment position provided to the appellant on 31 March 2023. It is based upon the sites considered in the appellant’s schedule of sites presented within Appendix 1 to their Statement of Case, but with the addition of 12 further sites not considered by the appellant set out in Table MH2a.

Table MH2a: Alternative sites not considered by appellant
AS1: <b>Wolvershill Strategic Growth Area</b> (various sequentially preferable sites as set out in latest SHLAA (CD8.19 – CD8.22), corresponding to draft allocation in emerging local plan – see Policy LP1 of the emerging local plan (CD8.23, page 21))
AS2: <b>Land at Mead Farm</b> (SHLAA ref: HE2075) (draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 131)
AS3: <b>Land west of Sandford</b> (SHLAA ref: HE201012) (draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 131))
AS4: <b>West of Hill Road, Winscombe</b> (SHLAA ref: HE2076) (draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 133)
AS5: <b>Land east of Ladymead Lane</b> (SHLAA ref: HE2023) (draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 127)
AS6: <b>North and south of Youngwood Lane</b> (SHLAA ref: HE20612) (corresponds to draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 118)
AS7: <b>Grove Farm, Backwell</b> (SHLAA ref: HE20595) (corresponds to draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 123)
AS8: <b>Greenhill Rd, Sandford.</b> (Application ref: 22/P/0227/OUT) resolution to approve.
AS9: <b>Land west of Trenchard Road, WsM</b> (Application ref: 18/P/3038/OUT)
AS10: <b>Pudding Pie Lane (west), Churchill</b> (draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 128)
AS11: <b>Weston College Site, Somerset Square, Nailsea</b> (draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 121)

AS12: **Elm Grove Nursery, Locking** (SHLAA ref: HE207) (draft housing allocation in emerging local plan – see CD8.23, Schedule 1, page 112)

'AS' – Additional Site

Of the 69 separate site records considered by the appellant (once duplicate entries accounted for), I agree on rejection of 42 of the sites set out in Table MH2b. Paragraph 5.36 of my proof of evidence sets out the reasons for my agreement on the rejection of these sites.

Table MH2b: Sites where rejection is agreed
<b>ST1:</b> Queensway/Midhaven Rise, BS22
<b>ST2:</b> Parklands Village (former RAF Locking site)
<b>ST3:</b> Land North of Oldmixon Road, BS24
<b>ST4:</b> Land at Wentwood Drive, BS24
<b>ST6:</b> South of Herluin Way, Avoncrest Site, BS23 3YN
<b>ST7:</b> Station Gateway, BS23 3DE
<b>ST11:</b> Land at Atlantic Road South, BS23 2DE
<b>ST12:</b> Birnbeck Pier and Environs
<b>ST13:</b> Lynton House Hotel
<b>ST15:</b> South of Manor Farm, North of Lyefield Road
<b>ST19:</b> North of Amesbury Drive, Bleadon
<b>ST20:</b> Purn House Farm industrial estate
<b>ST22:</b> Land adjacent to Sweet Briar, West End, Nailsea, BS48 4DB
<b>ST23:</b> West of Engine Lane
<b>ST25:</b> Youngwood Lane, BS48 4NR
<b>ST27:</b> Court Farm, All Saints lane
<b>ST28:</b> 2-6 Bay Road
<b>ST30:</b> Old Mill Road, Portishead
<b>ST31:</b> Tickenham Garden Centre, Church Lane, Tickenham, Clevedon, Avon, BS21 6SD
<b>ST32:</b> Land to the east of Wolvershill Road
<b>ST37:</b> Woodborough Farm, Winscombe

<b>ST38:</b> Arnolds Way (Phase 2) Yatton
<b>ST39:</b> Land at North End, Yatton
<b>ST42:</b> Yatton Station, BS49 4BD
<b>ST43:</b> North of Nortons Wood Lane, Clevedon
<b>ST44:</b> South of Cedar Way, Portishead
<b>ST45:</b> Land south of Clevedon Road
<b>ST46:</b> North of Youngwood Lane
<b>ST49:</b> East of Frost Hill, Yatton
<b>ST50:</b> South of sports ground north of Cox's Green, Wrington
<b>ST53:</b> North of Wrington Mead
<b>ST54:</b> Park Farm, Congresbury
<b>ST58:</b> Land south of Knightcott Gardens, Banwell
<b>ST59:</b> Wooleys farm
<b>ST60:</b> Hilldale Road
<b>ST61:</b> South east of Church Lane, Backwell
<b>ST62:</b> Land at Dark Lane, Backwell
<b>ST63:</b> Hill Road, Sandford
<b>ST64:</b> Land West of Wolverhill Road, North of Wolverhill Park and Knightcott Park Banwell
<b>ST65:</b> Barrow Hospital, Barrow Gurney, Long Ashton, BS48 3SG
<b>ST66:</b> Land South of Cox's Green, Wrington, BS40
<b>ST67:</b> Cobthorn Way, Congresbury, BS48 5BJ

I disagree on the rejection of 27 of the sites considered by the appellant. Along with the 12 additional sites I consider represent reasonable alternatives from Table MH2a, these are set out with plans and supporting justification in the Site Templates section below.

The plan overleaf indicates the broad distribution of these sites in relation to the appeal site.



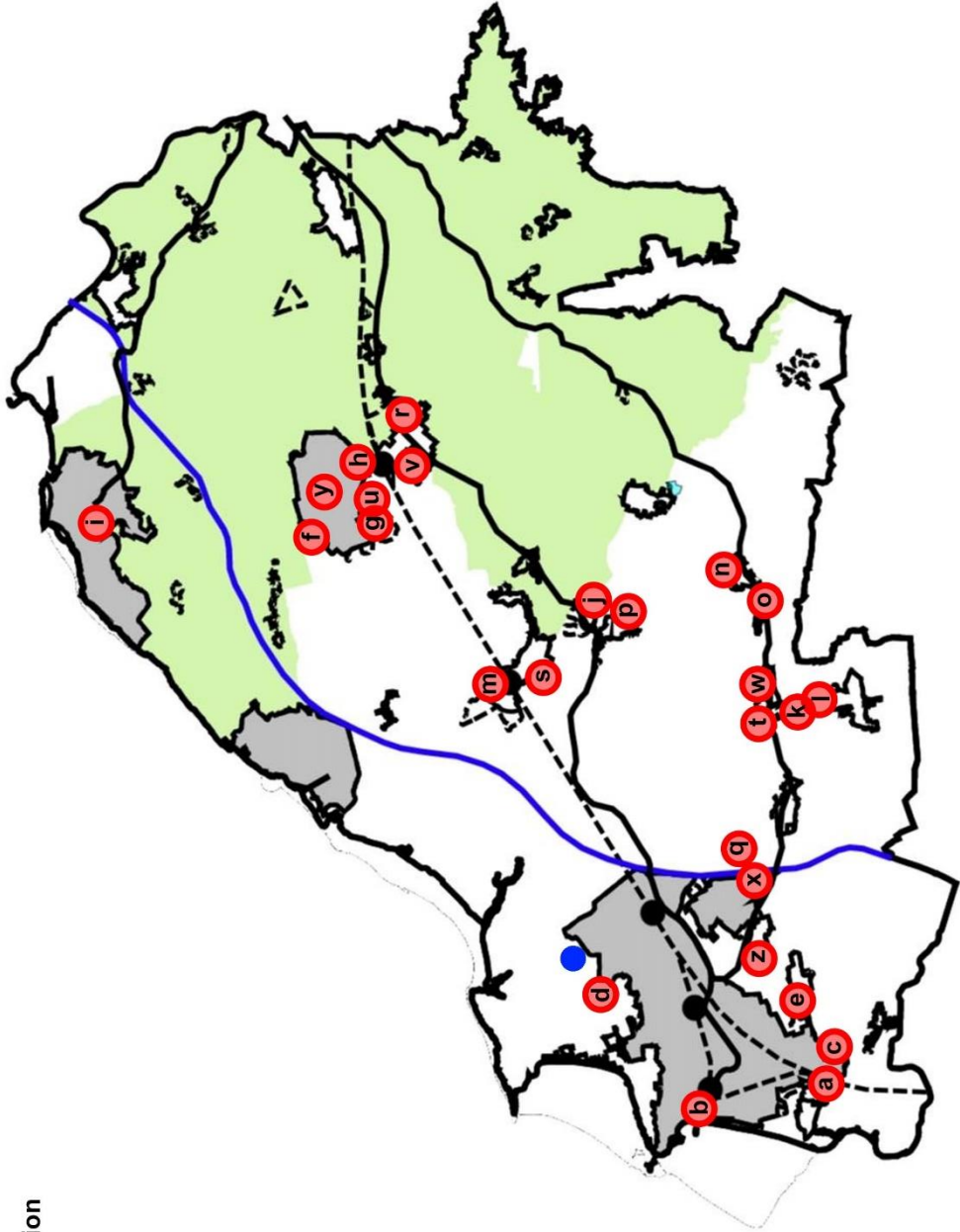
Plan indicating the broad distribution of alternative sites. Site references correspond to those provided in the Site Templates Green shade indicates extent of Green Belt land.

**Key**

● Appeal site general location

Site reference

- a ST5
- b ST8, ST9, and ST10
- c ST14
- d ST16, and ST17
- e ST18
- f ST21
- g ST24, and ST47
- h ST26
- i ST29
- j ST33
- k ST34, and AS4
- l ST35, and ST36
- m ST40, ST41, and ST48
- n ST51, AS5, and AS10
- o ST52
- p ST55
- q ST56, ST57, and AS1
- r ST68
- s ST69
- t AS2, and AS3
- u AS6
- v AS7
- w AS8
- x AS9
- y AS11
- z AS12



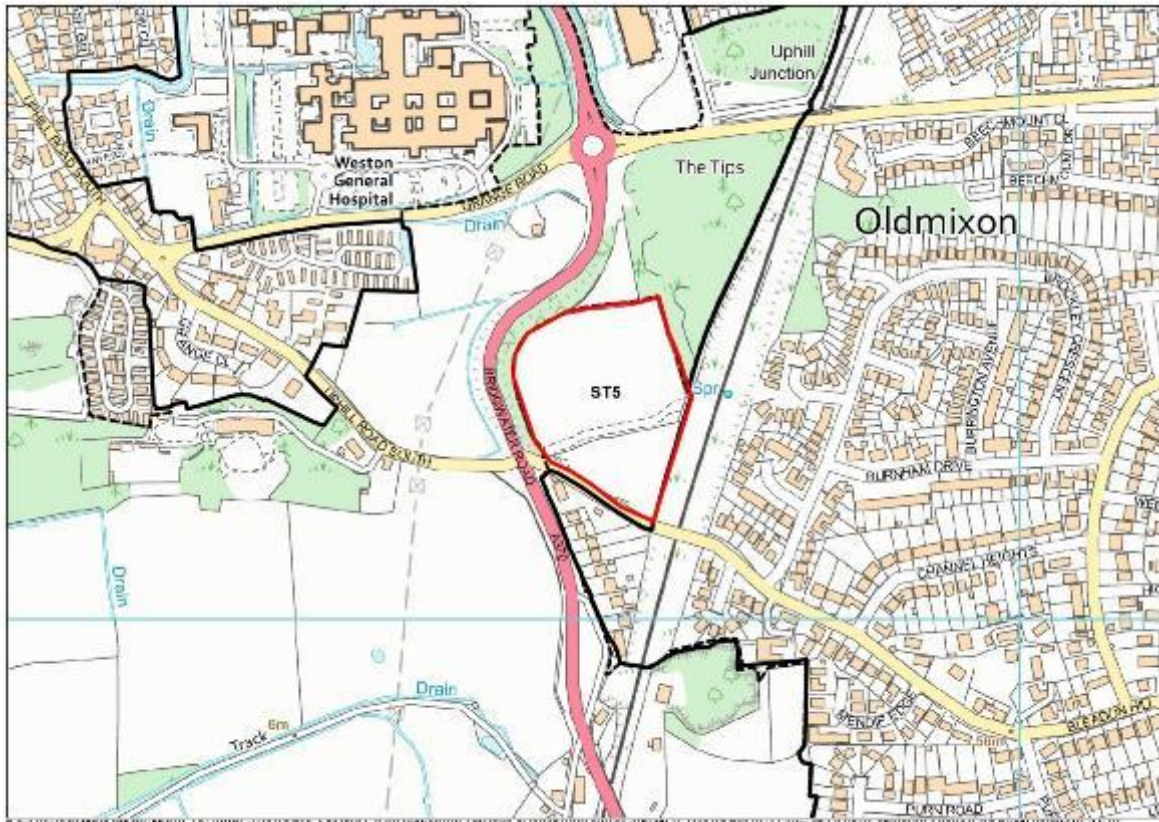
## Description of Site Templates

Each site template includes:

1. A site reference – that corresponds to the reference provided in the Sites Schedule provided to the appellant in March.
2. An assigned category explained in Table 2 of my proof of evidence.
3. A site name and ‘associated settlement’
4. Details related to the suitability of the alternative site focussing on the locational suitability as a matter of principle.
5. Details related to the delivery of the alternative site explaining why there is considered to be a ‘reasonable prospect’ that the site could be delivered in the short-term.
6. Details related to the availability of the alternative site explaining whether the site has been submitted for consideration as part of the emerging local plan.
7. Site plan–

1 ←	Site reference	S19	Category 1	→ 2
	Site name	Land at Bridgwater road		→ 3
	Associated settlement	Weston-super-Mare		
7 ←				
	Suitability	Site has planning permission including outline (17/P/1138/O) and reserved matters (22/P/0492/RM) for 60 dwellings.  Site is in flood zone 1. A small area of the site is indicated to have a surface water flood risk and the proposed layout avoid this.		→ 4
	Delivery	Likely to commence in 2023.		→ 5
	Availability	As per planning application.		→ 6

Site reference	<b>ST5</b>	<b>Category 1</b>
Site name	Land at Bridgwater road	
Associated settlement	Weston-super-Mare	



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Suitability	<p>Site has planning permission including outline (17/P/1138/O) and reserved matters (22/P/0492/RM) for 60 dwellings approved in October 2022.</p> <p>Site is in flood zone 1. A small area of the site is indicated to have a surface water flood risk and the proposed layout avoids this.</p> <p>Appellant's assessment concludes that the site is too small however this is not a reason to discount alternative sites.</p>
Delivery	<p>Reasonable prospect that the site is available to be developed for housing in short-term. Correspondence from the developer confirmed site likely to come forward before 2026. This position was subject to Reserved Matters consent that is now in place as above.</p> <p>A number of applications to discharge conditions have been submitted.</p>
Availability	<p>As per planning application. Site controlled by a developer.</p>

Site reference	<b>ST8</b>	<b>Category 2</b>
Site name	Walliscote Place	
Associated settlement	Weston-super-Mare	



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Suitability	<p>Site is allocated in the Sites Allocations Plan (CD4.3 – see page 33) for 70 residential units.</p> <p>The site is an urban regeneration site located within the Town Centre of WSM.</p> <p>Site is in flood zone 1.</p> <p>Appellant’s assessment concludes that the site is too small however this is not a reason to discount alternative sites.</p>
Delivery	<p>Site category 2.</p> <p>Likely to commence in short-term. Development of this site agreed as a priority in the Council’s Development Strategy. Site marketing and appointment of development partner and associated planning application anticipated 2023/24. The appellant refers to no application being submitted however this is not a requirement for the identification of reasonably available sites.</p>
Availability	<p>NSC own this site and have carried out demolition of the former police station following its relocation to make way for development. The site is currently allocated and proposed to be rolled forward into the new, emerging local plan.</p>

Site reference	<b>ST9</b>	<b>Category 2</b>
Site name	Dolphin Square	
Associated settlement	Weston-super-Mare	



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Suitability	<p>Site is allocated in the Sites Allocations Plan (CD4.3 – see page 33) for 220 residential units.</p> <p>The site is an urban regeneration site located within the Town Centre of WSM.</p> <p>Appellant’s assessment concludes that the site is too small however this is not a reason to discount alternative sites.</p>
Delivery	<p>Site category 2.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. The site is cleared and available for development.</p>
Availability	<p>NSC owns this site.</p>

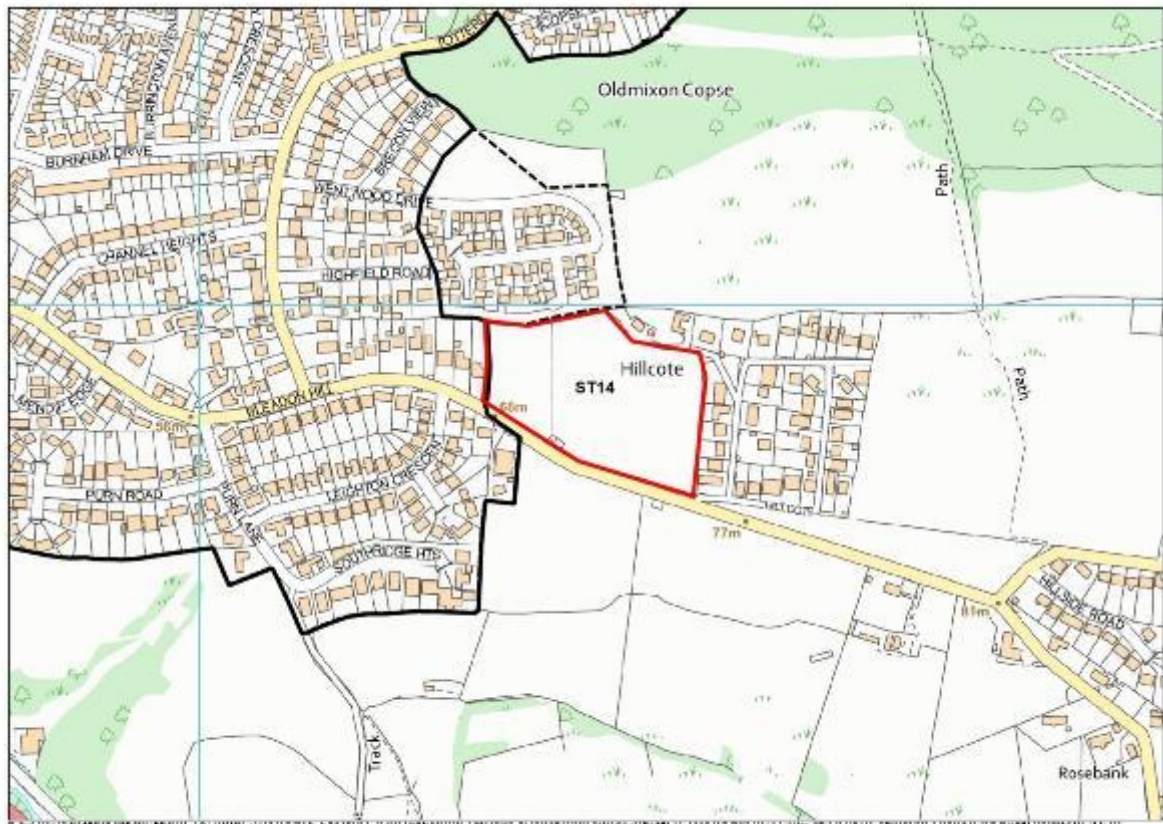
Site reference	<b>ST10</b>	<b>Category 2</b>
Site name	Former TJ Hughes Store	
Associated settlement	Weston-super-Mare	



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Suitability	<p>Site is allocated in the Sites Allocations Plan (CD4.3 – see page 32) for 18 residential units.</p> <p>The site is an urban regeneration site located within the Town Centre of WsM.</p> <p>Site is in flood zone 1.</p> <p>Appellant's assessment concludes that the site is too small however this is not a reason to discount alternative sites.</p>
Delivery	<p>Site category 2.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term.</p>
Availability	<p>Site had planning consent for a mixed-use scheme including residential apartments granted in June 2018, but this consent has expired. Whilst I would not consider this a deliverable site in housing land supply terms, I consider there to be a reasonable prospect that it could be available for development within 5 years.</p>

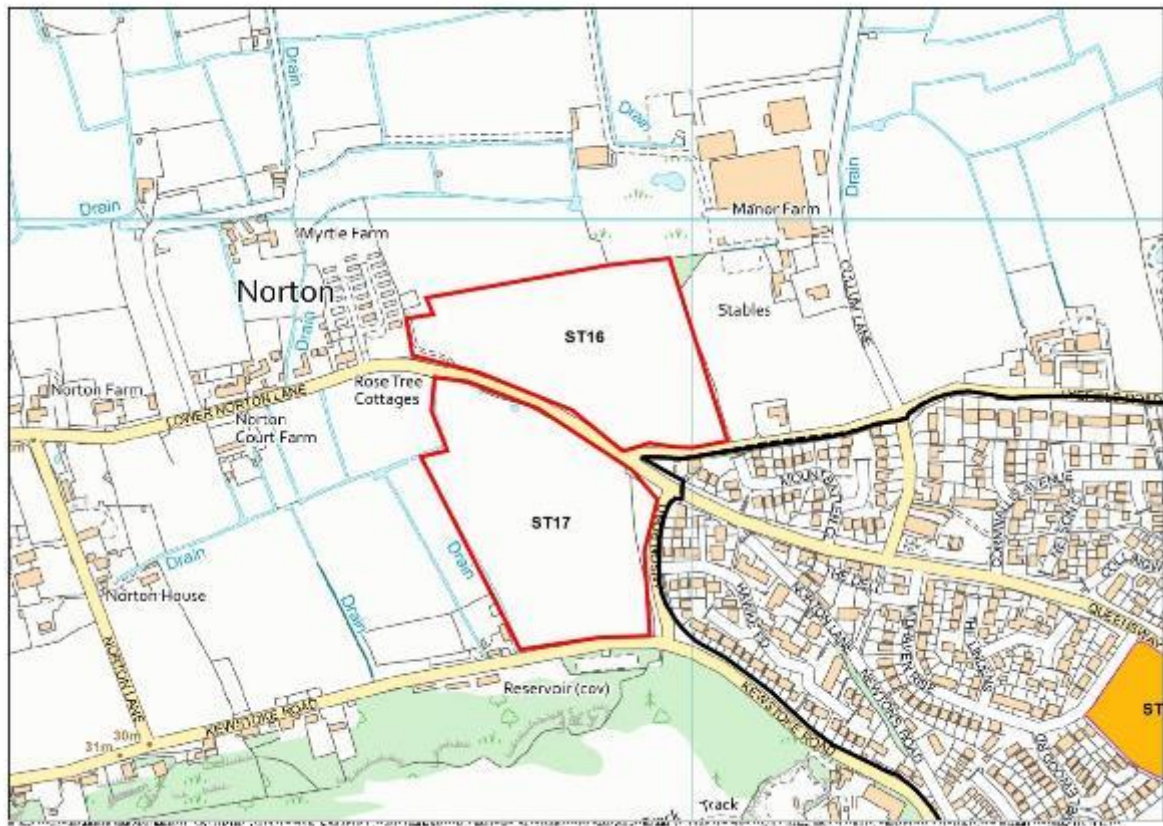
Site reference	<b>ST14</b>	<b>Category 4</b>
Site name	Leighton Crescent	
Associated settlement	Weston-super-Mare	



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Suitability	<p>Site is located adjacent to the settlement boundary of WsM where Policy CS28 supports in principle, residential proposals up to 75 units subject to defined criteria.</p> <p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE201030) for 81 units.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 4.</p> <p>Following consideration, the SHLAA estimated delivery within the first 5 years of the plan period (23-28).</p> <p>No overriding constraints are identified within the SHLAA.</p>
Availability	<p>This site was submitted to the call for sites in 2020 for consideration for residential development.</p>

Site reference	<b>ST16</b>	<b>Category 4</b>
Site name	Rose Tree Farm	
Associated settlement	Weston-super-Mare	

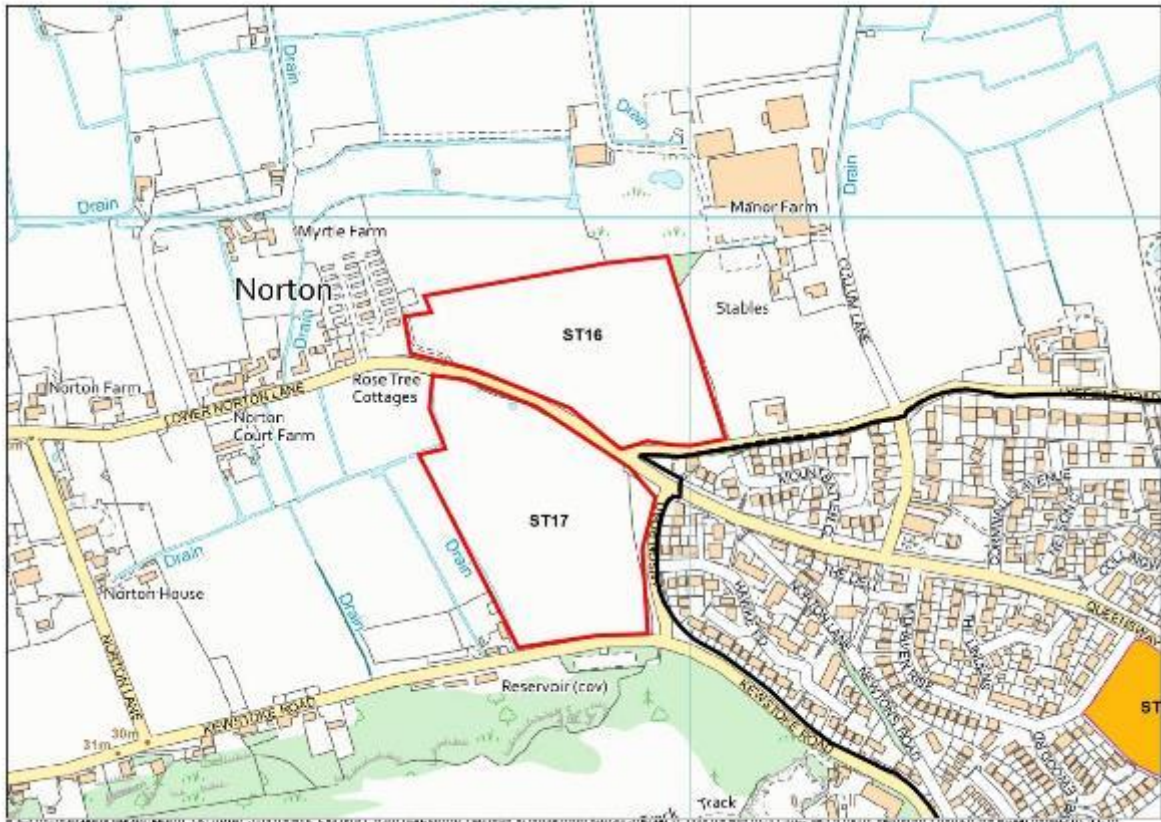


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Suitability	<p>Site is located adjacent to the settlement boundary of WsM where Policy CS28 permits in principle, residential proposals up to 75 units.</p> <p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE20471) for 109 units.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 4.</p> <p>Following consideration, the SHLAA estimated potential delivery of 109 units within the first 5 years of the plan period (23-28).</p> <p>The only constraint identified in SHLAA is that a small part of the site is in flood zone 3a however this part of the site could be avoided.</p>
Availability	<p>This site was submitted to the call for sites in 2020 for consideration for residential development (110 units).</p>



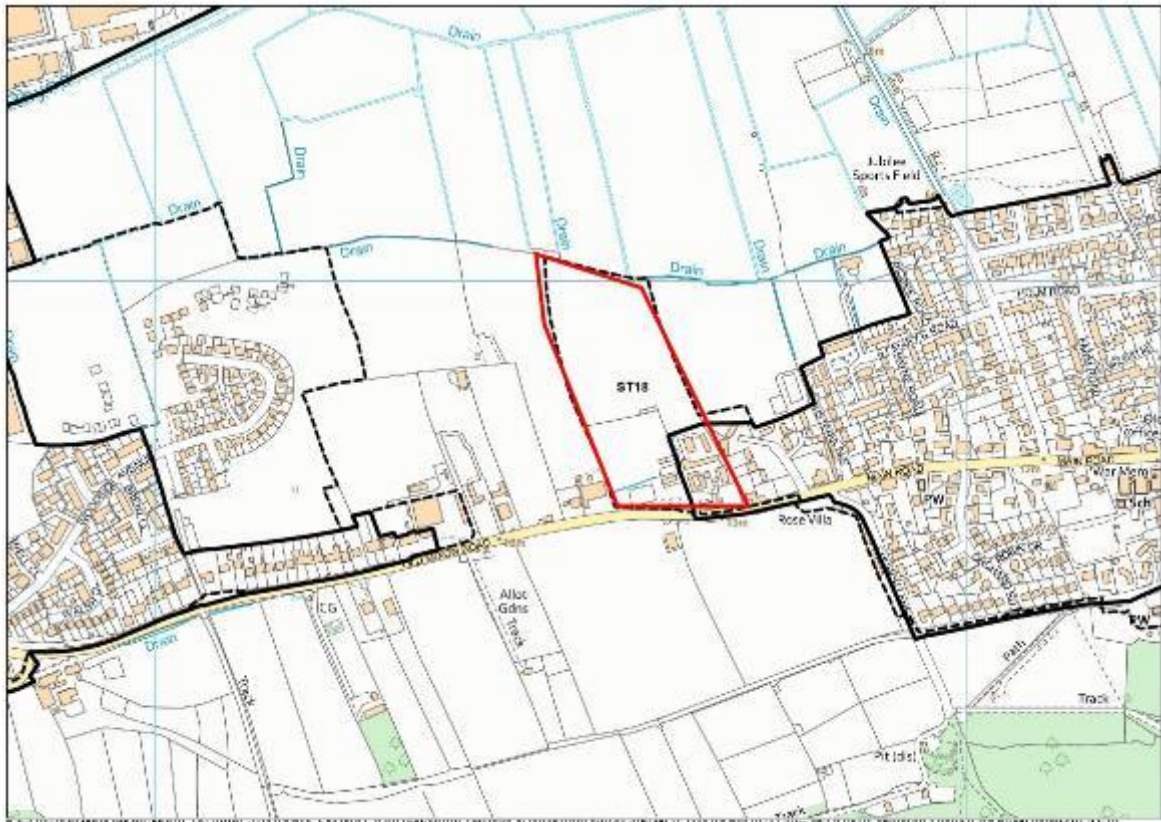
Site reference	<b>ST17</b>	<b>Category 1</b>
Site name	Land to the west of Anson Road	
Associated settlement	Weston-super-Mare	



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Suitability	<p>Site has a resolution to approve subject to signing the S106 for up to 70 dwellings (21/P/3529/OUT).</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Likely to commence in the short-term. The site submission to the local plan process indicated that the site is within the control of a willing developer and that there are no known constraints to development subject to securing planning permission. Appellant's assessment concludes that the site is not for sale however this is not a requirement in determining 'reasonably available' sites. Sites do not need to be owned by the appellant to be deemed reasonably available.</p>
Availability	<p>As per planning application.</p> <p>The site was submitted to the local plan call for sites in 2020 for up to 85 dwellings.</p>

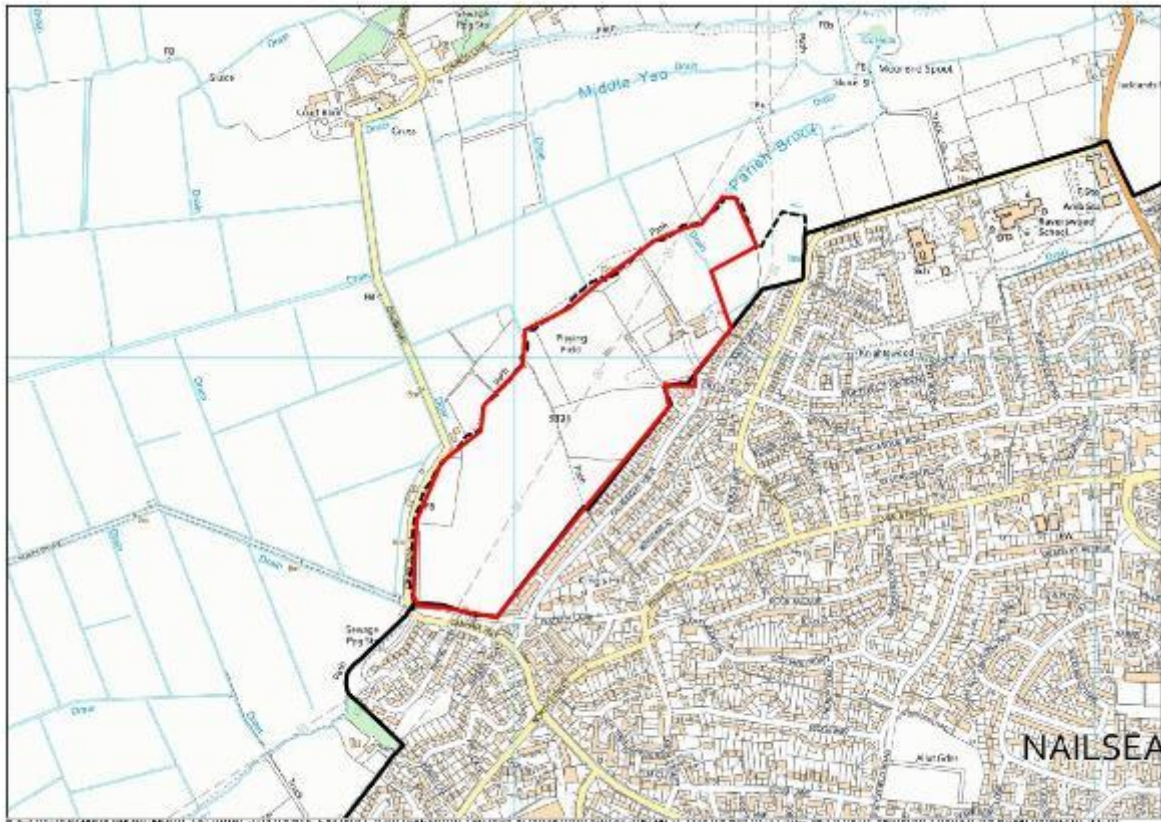
Site reference	<b>ST18</b>	<b>Category 5</b>
Site name	Grange Farm	
Associated settlement	Hutton	



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Suitability	<p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE202017) for 132 units.</p> <p>The site is proposed for residential allocation (100 units) in the emerging local plan – see CD 8.23, page 112 – <i>site name in the plan is 'Land west of Hutton'.</i></p> <p>Majority of site is in flood zone 1.</p>
Delivery	<p>Site category 5.</p> <p>The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. No overriding constraints are identified that would prohibit development.</p> <p>Given NSC ownership, SHLAA potential, and draft allocation status, there is a reasonable prospect of the site being available for development in the short-term.</p>
Availability	<p>NSC own this site and have promoted it through the new local plan.</p>

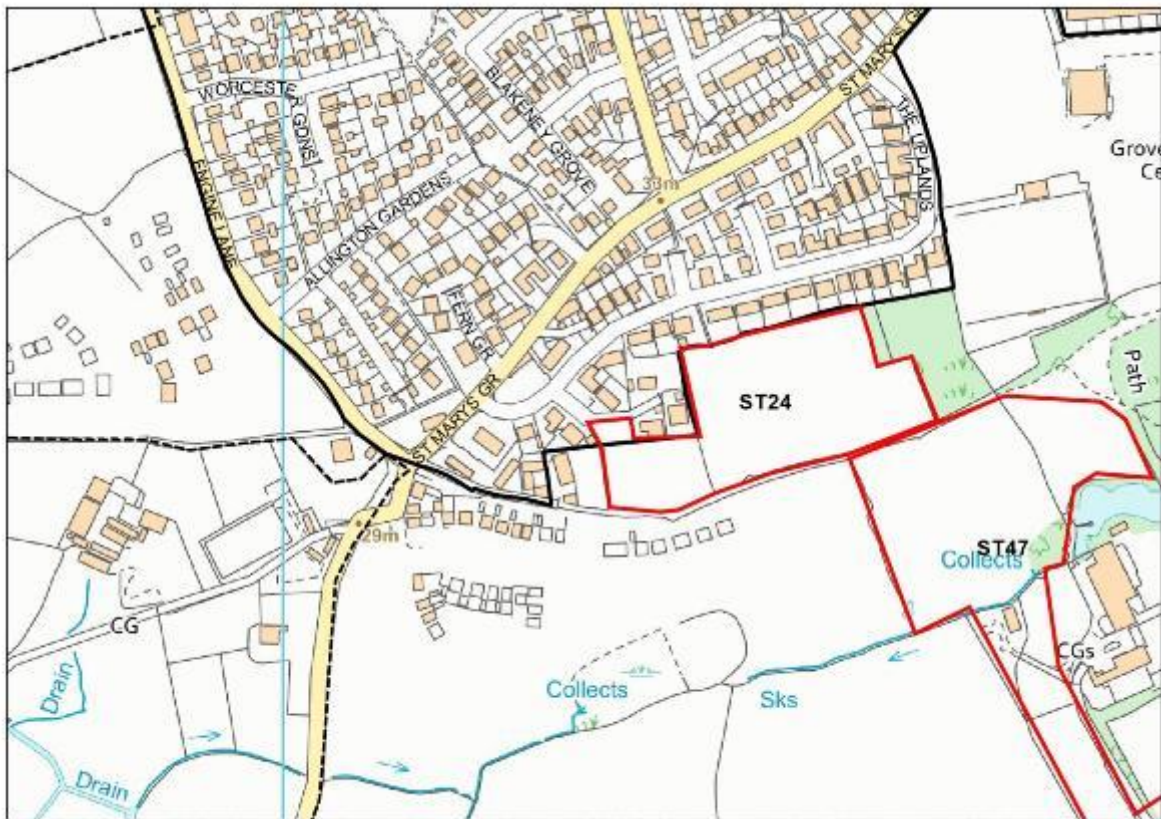
Site reference	<b>ST21</b>	<b>Category 2</b>
Site name	Land at North West Nailsea	
Associated settlement	Nailsea	



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Suitability	<p>Site is allocated in the Sites Allocations Plan (CD4.3 – see page 43) for 450 residential units.</p> <p>Site is in flood zone 1. The appellant’s assessment rejected this site as being too big compared to the appeal site however this is contrary to the PPG.</p>
Delivery	<p>Site category 2.</p> <p>Potential for some development within the short-term. The SHLAA (site ref: HE20273) indicates delivery of 110 units within the short-term. Recent response from developer indicating first housing completions in 2025. The appellants assessment rejects the site because no application is submitted, however this is not a requirement of national or local policy and/or guidance.</p>
Availability	<p>The site has been submitted to the new local plan through both the Challenges and Choices stage consultations.</p> <p>Site is controlled by a developer.</p>

Site reference	<b>ST24</b>	<b>Category 1</b>
Site name	Land south of the Uplands	
Associated settlement	Nailsea	



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Suitability	<p>Site has planning permission (20/P/2000/R3) for 52 new dwellings.</p> <p>The site is also allocated within the Sites and Policies Plan, Part 2: Site Allocations Plan.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Likely to commence in short-term.</p> <p>Commencement anticipated in 2023. The only reason the appellant rejects this site is due to the site being unlikely to be available for purchase, however this is not a requirement in the identification of 'reasonably available' sites.</p>
Availability	<p>NSC own this site and anticipate commencement in 2023.</p>

Site reference	<b>ST26</b>	<b>Category 1</b>
Site name	Trendlewood Way	
Associated settlement	Nailsea	



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Suitability	<p>The site is consented (22/P/1295/RM) linked to outline (18/P/5234/OUT) for up to 24 units.</p> <p>The site is allocated for residential use (30 units) within the Sites and Policies Plan, Part 2: Site Allocations Plan.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. Appellant's assessment confirms developer commitment to bringing the site forward. The only reason the appellant appears to reject the site is due to it being too small however this is contrary to national and local policy and guidance.</p>
Availability	<p>As per planning application. A developer controls the site.</p>

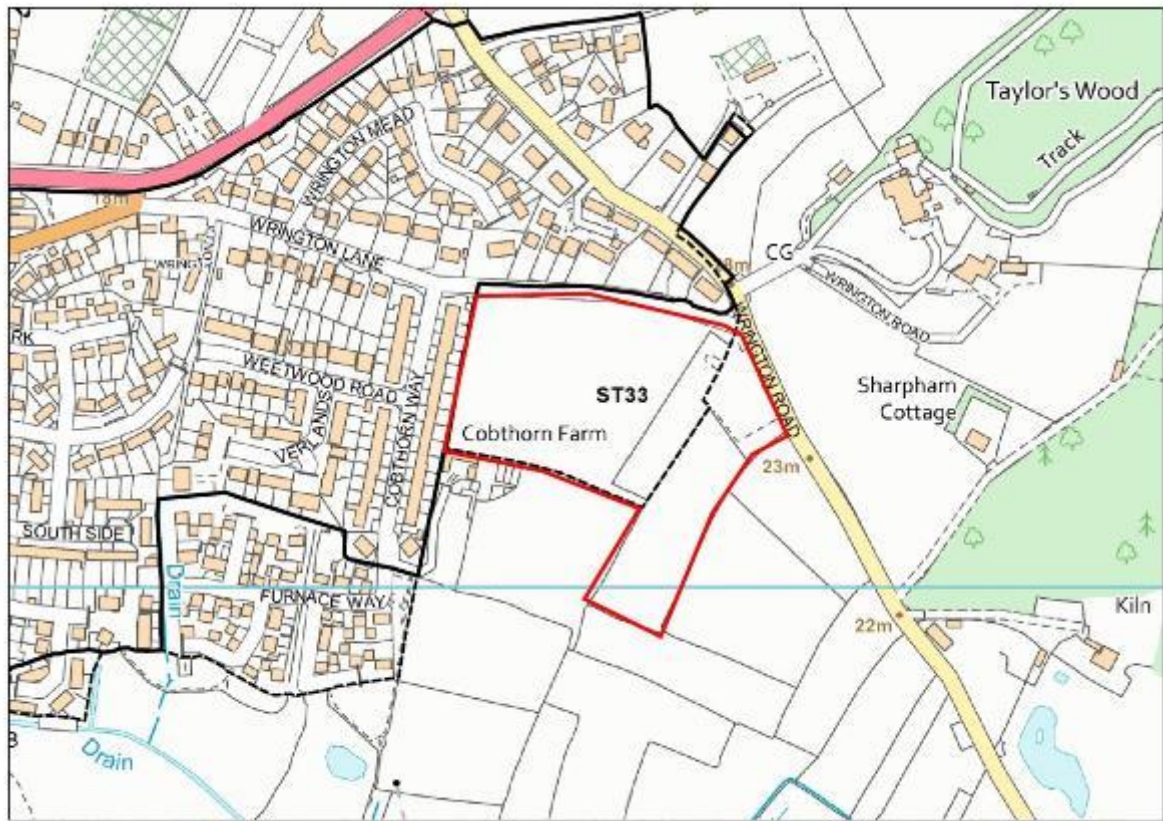
Site reference	<b>ST29</b>	<b>Category 2</b>
Site name	Land south of Downside	
Associated settlement	Portishead	



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Suitability	<p>Site is allocated in the Sites Allocations Plan (CD4.3 – see page 45) for 23 residential units.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 2.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term.</p> <p>Site is identified within the Council's short-term development programme.</p>
Availability	<p>Site is owned by NSC.</p>

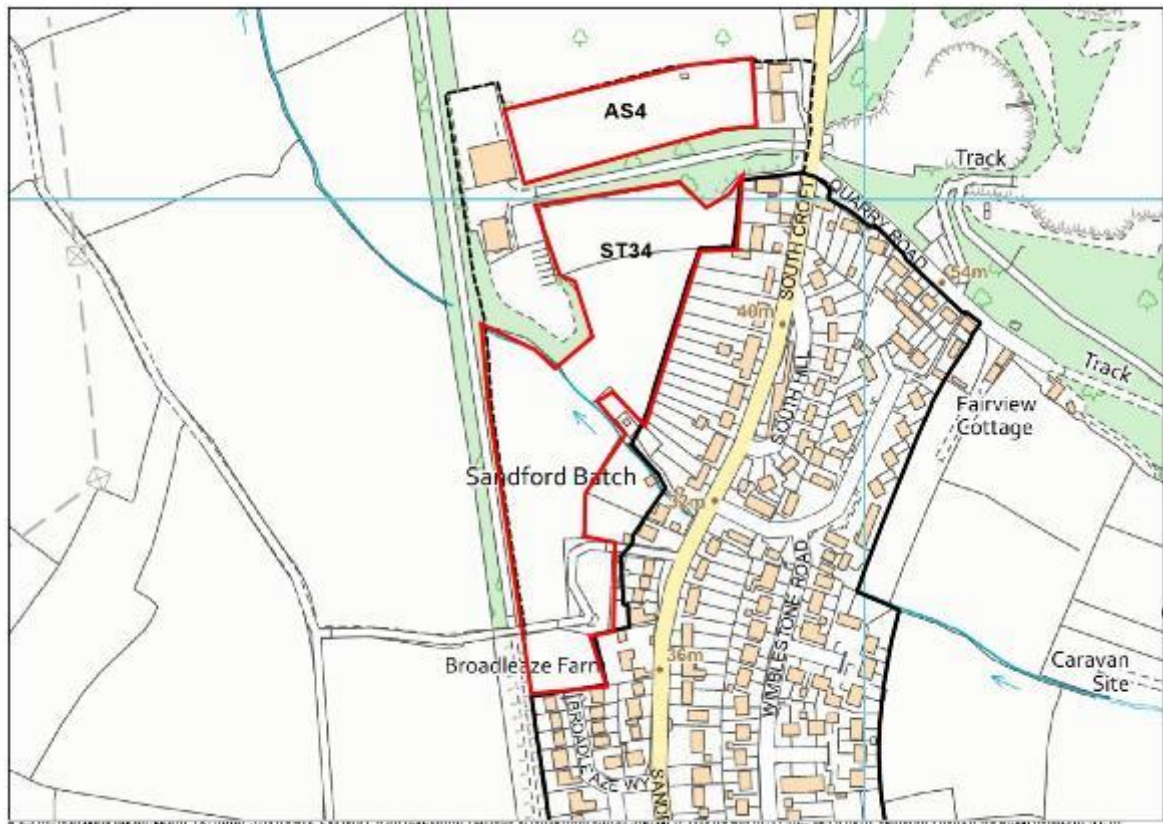
Site reference	<b>ST33</b>	<b>Category 1</b>
Site name	Land off Wrington Lane	
Associated settlement	Congresbury	



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Suitability	<p>Site has planning permission including outline (16/P/1521/O) and reserved matters (19/P/1657/RM) for 50 dwellings).</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. The appellant's assessment rejects this site due to it not being available for purchase however this is not a requirement in the identification of 'reasonably available' sites. The site must merely be available for residential development.</p>
Availability	<p>As per planning application.</p> <p>Site controlled by a developer.</p>

Site reference	<b>ST34</b>	<b>Category 2</b>
Site name	Broadleaze Farm	
Associated settlement	Winscombe	

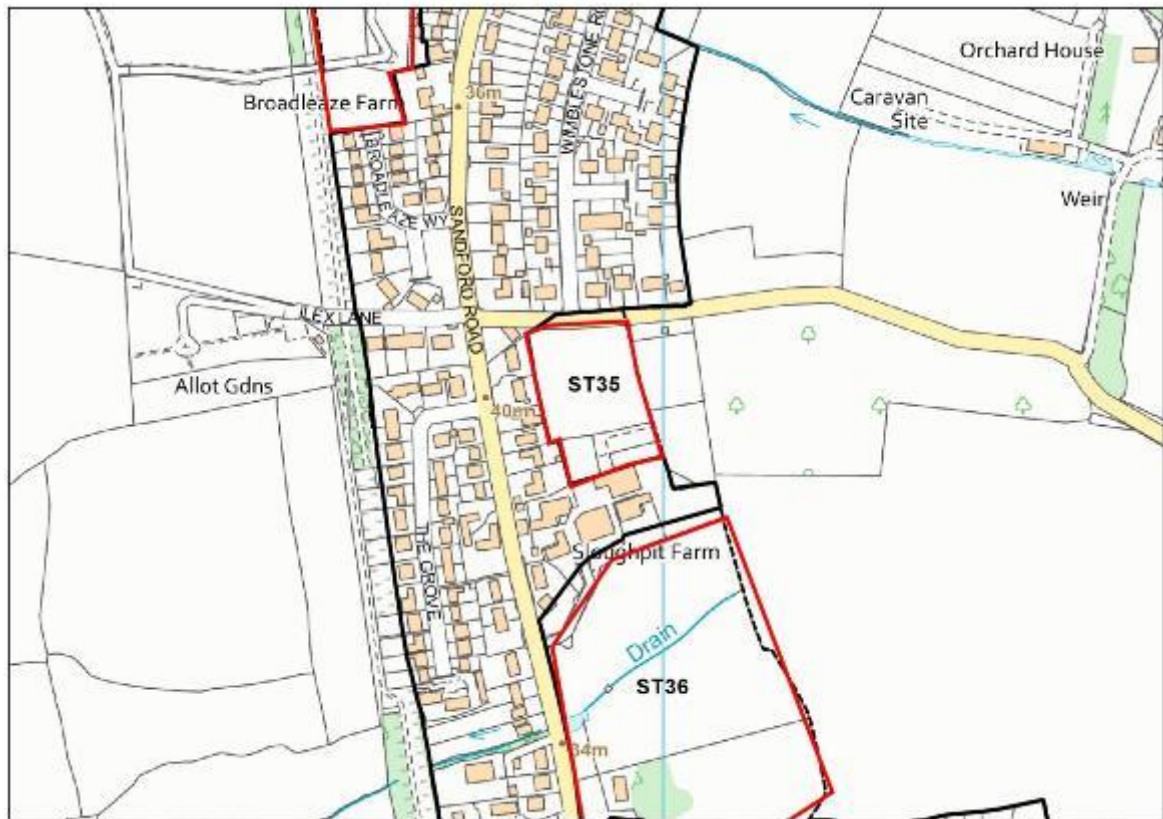


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Suitability	<p>Site is allocated in the Sites Allocations Plan (CD4.3 – see page 54) for 74 residential units.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 2.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term.</p>
Availability	<p>This site was submitted to the call for sites in 2020 for consideration for residential development. This included an estimation that it could be delivered in the short-term. It was also submitted to the Choices consultation.</p>



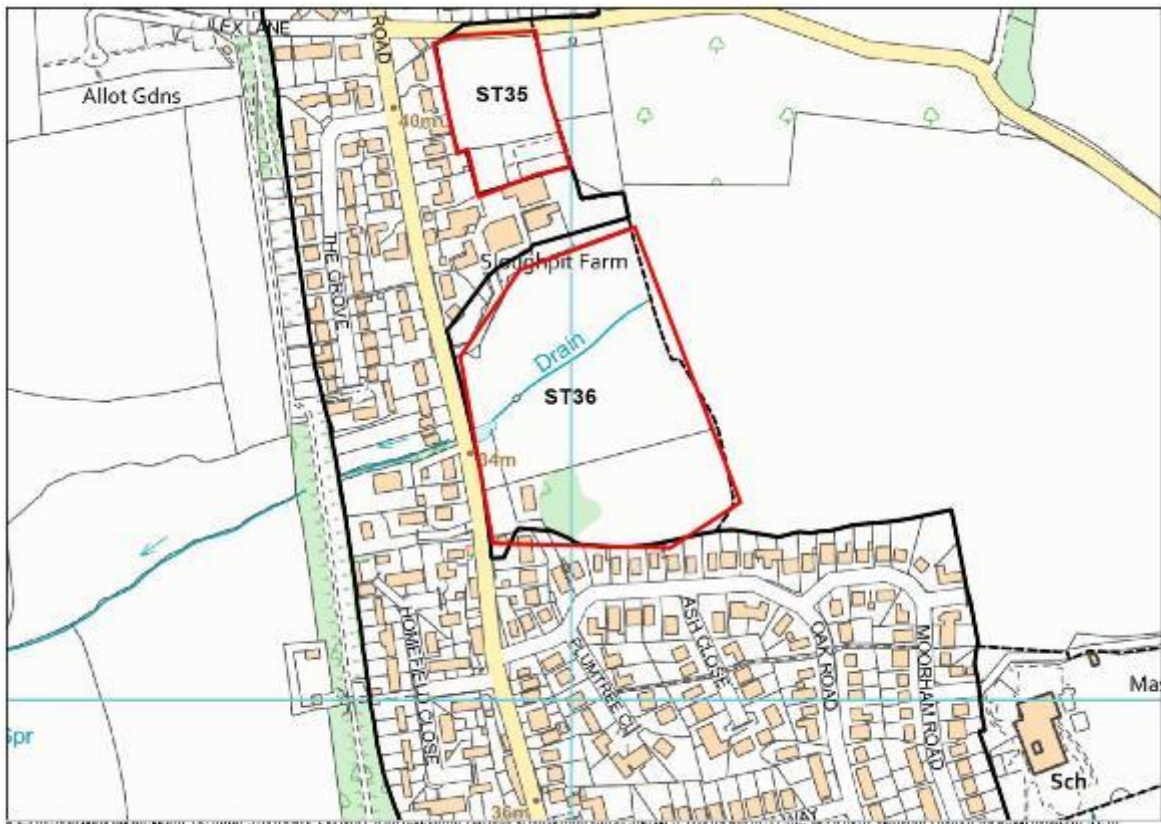
Site reference	<b>ST35</b>	<b>Category 2</b>
Site name	Land at Shipham Lane	
Associated settlement	Winscombe	



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Suitability	<p>Site is allocated in the Sites Allocations Plan (CD4.3 – see page 53) for 28 residential units.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 2.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. Without prejudice to the referenced application, the applicant's Planning Report provided in support of the application confirms that development could commence in the summer of 2023 with completion by 2026 (para 6.9).</p>
Availability	<p>Planning application submitted for this and ST36 (application ref: 22/P/2105/FUL). As per planning application.</p> <p>Site controlled by a developer.</p>

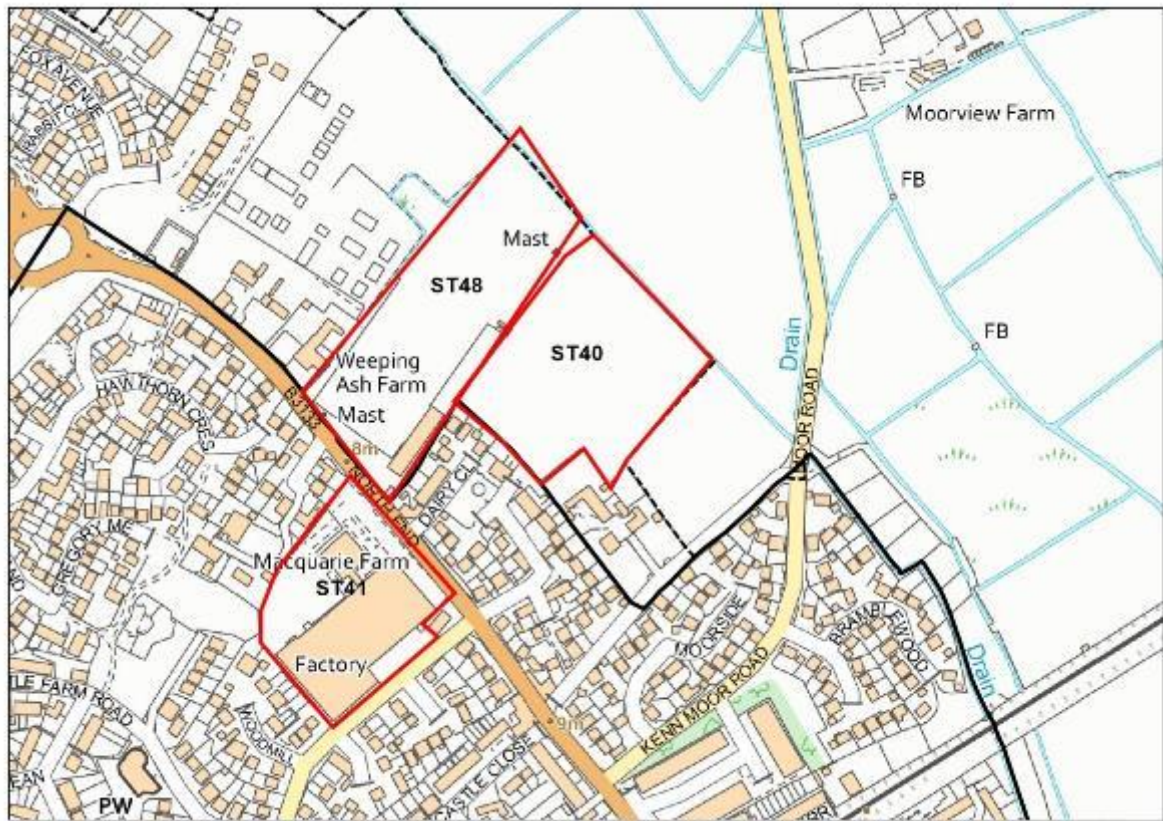
Site reference	<b>ST36</b>	<b>Category 2</b>
Site name	Land adjoining Coombe Farm	
Associated settlement	Winscombe	



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Suitability	<p>Site is allocated in the Sites Allocations Plan (CD4.3 – see page 53) for 24 residential units.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 2.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. Without prejudice to the referenced application, the applicant's Planning Report provided in support of the application confirms that development could commence in the summer of 2023 with completion by 2026 (para 6.9).</p>
Availability	<p>Planning application submitted for this and ST35 (application ref: 22/P/2105/FUL). As per planning application.</p> <p>Site controlled by a developer.</p>

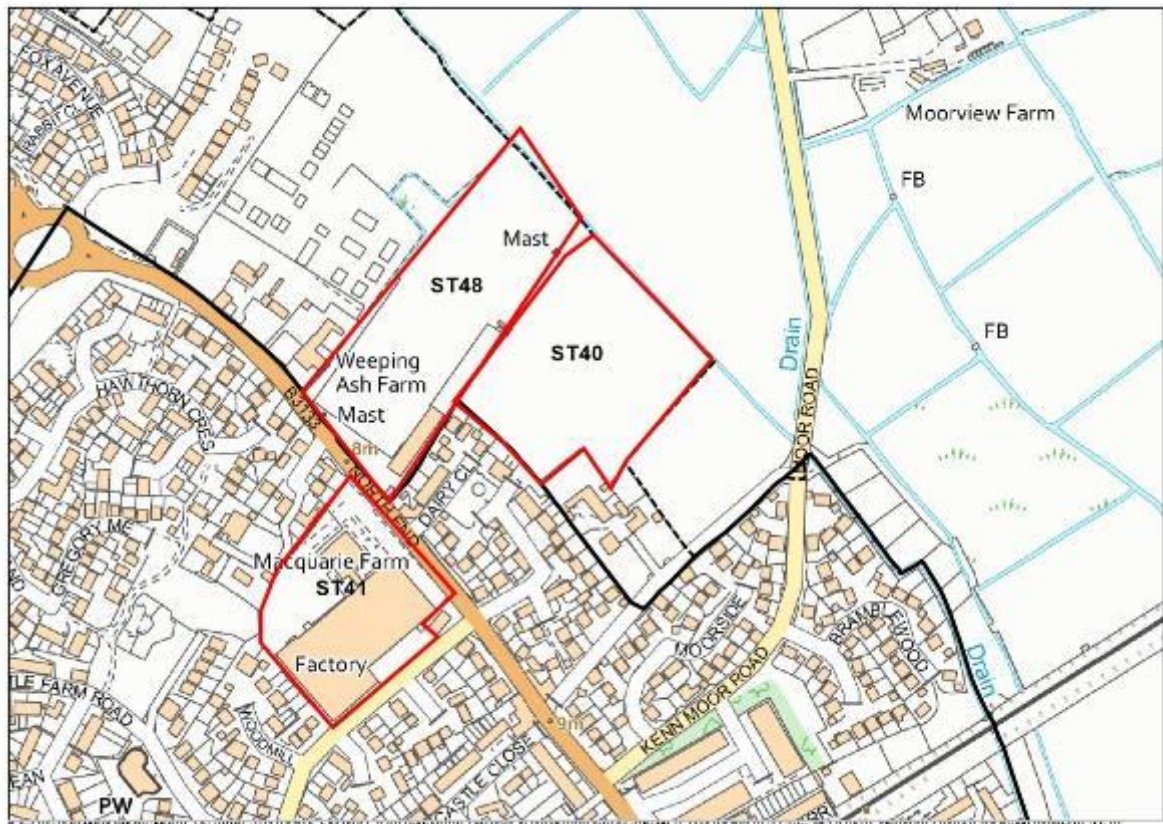
Site reference	<b>ST40</b>	<b>Category 1</b>
Site name	Moor Road	
Associated settlement	Yatton	



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Suitability	<p>Site is has planning permission for 60 dwellings (application ref: 19/P/3197/FUL).</p> <p>Majority of site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. This site was allowed at appeal, at which the appellant confirmed the site to be deliverable supply. The appellant's assessment rejects this site because it is owned by a developer and therefore not available however this is not a requirement in the identification of 'reasonably available' sites.</p>
Availability	<p>As per planning application.</p> <p>Site is controlled by a developer.</p>

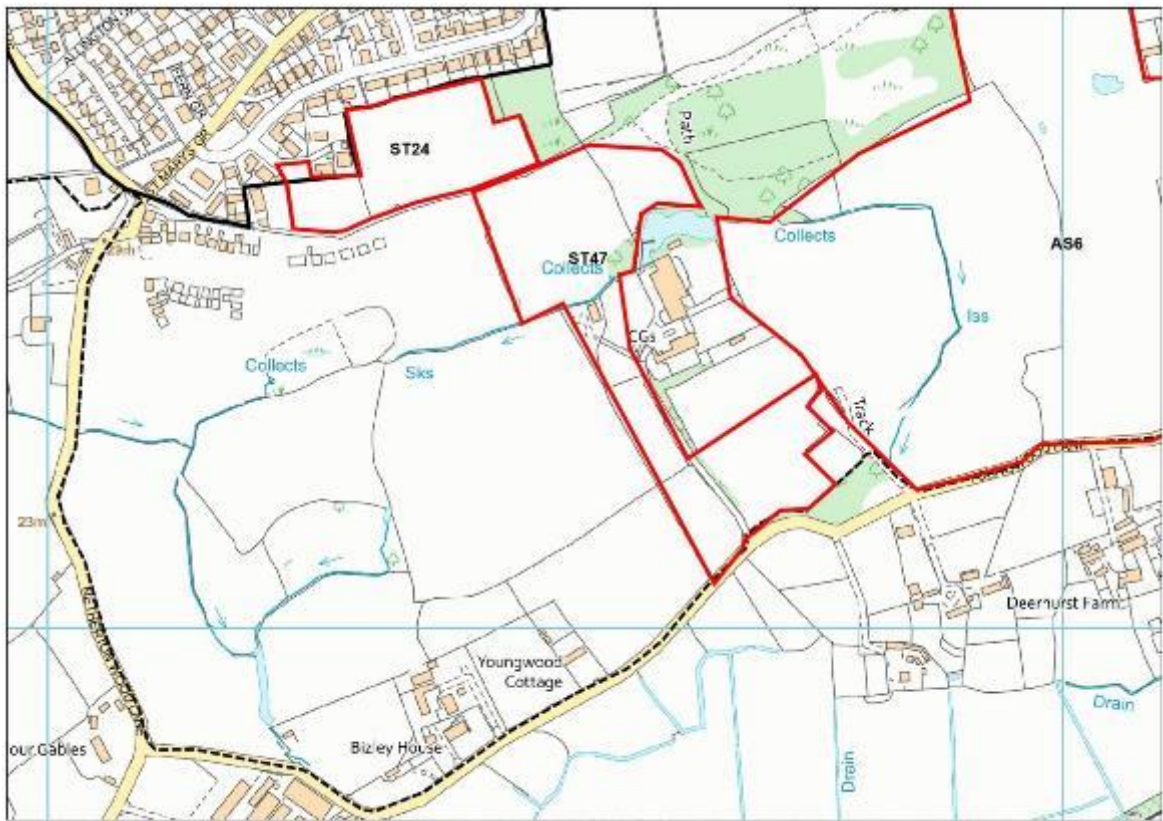
Site reference	<b>ST41</b>	<b>Category 1</b>
Site name	Oxford Plasma	
Associated settlement	Yatton	



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Suitability	<p>Site has planning permission for up to 55 units – application ref: 15/P/1299/O.</p> <p>Site is also allocated in the Sites Allocations Plan (CD4.3 – see page 47) for 51 residential units.</p> <p>The appellant’s assessment rejects the site including the reason that it is too small however this is contrary to national and local policy/ guidance.</p> <p>Majority of site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term.</p>
Availability	<p>As per planning consent. This site is now controlled by a developer.</p>

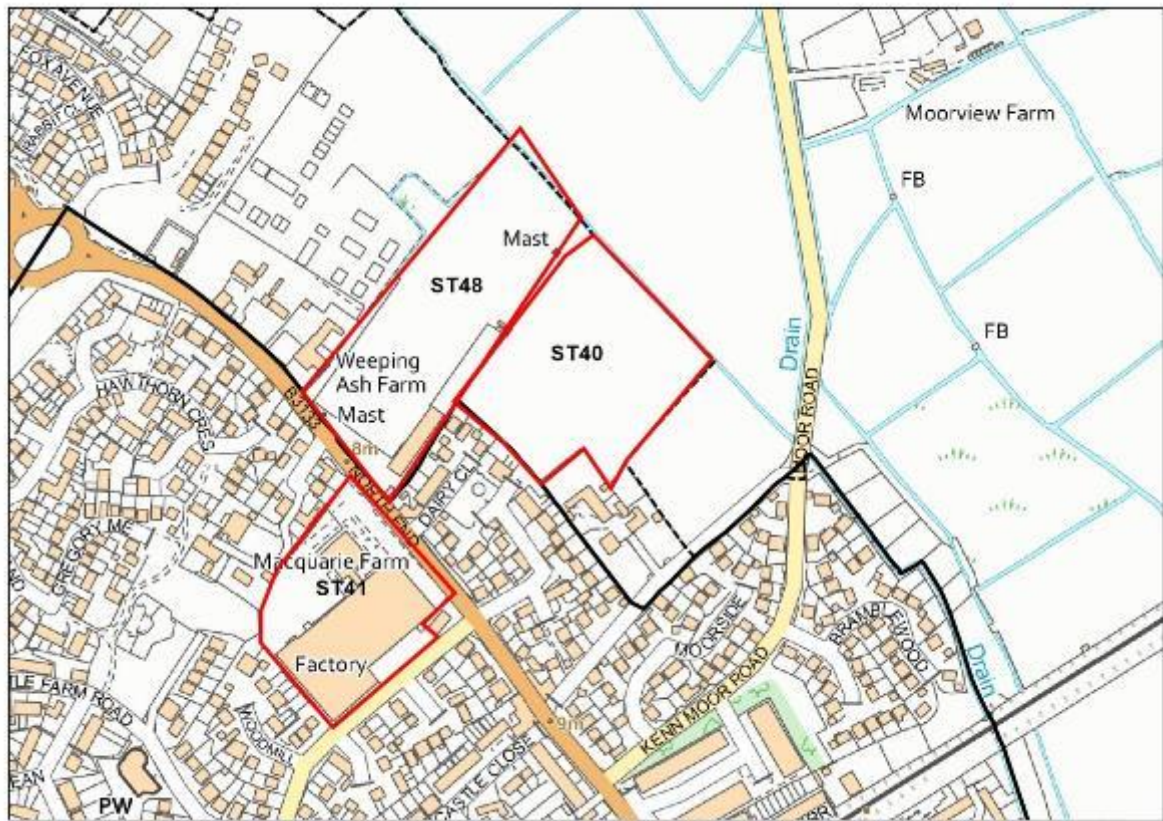
Site reference	<b>ST47</b>	<b>Category 5</b>
Site name	Land south of Nailsea	
Associated settlement	Nailsea	



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Suitability	<p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE20591) for 130 units.</p> <p>The site is part of a proposed allocation (Land south of Nailsea) for residential (600 units) in the emerging local plan – see CD 8.23, page 118.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 5.</p> <p>The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. The sites submission to the plan making process, identification as potential in SHLAA, and draft allocation indicate a reasonable prospect that site could be available in short-term.</p>
Availability	<p>Site submitted to local plan for consideration.</p>

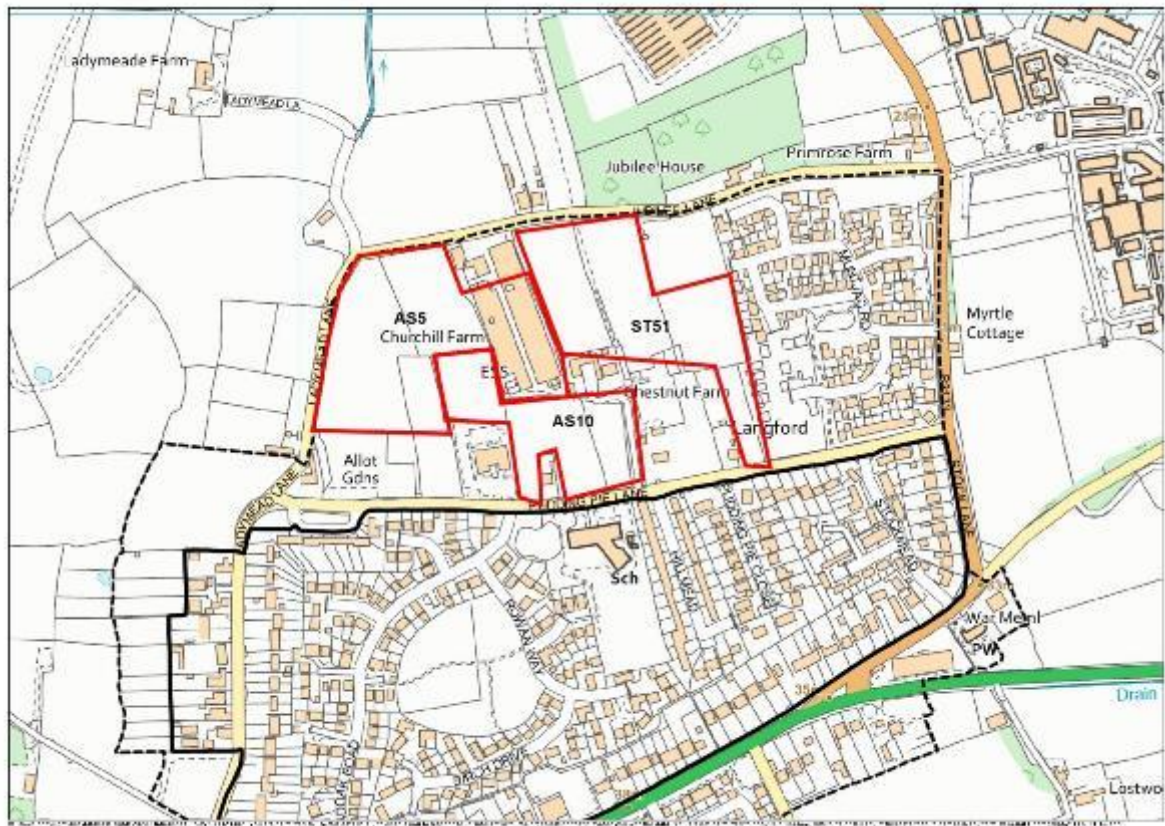
Site reference	<b>ST48</b>	<b>Category 3</b>
Site name	Yatton Rugby Club	
Associated settlement	Yatton	



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Suitability	<p>Site is identified as potential in the SHLAA (site ref: HE2012) for 70 units and is a draft housing allocation in the emerging local plan (see CD 8.23 page 125).</p> <p>Majority of site is in flood zone 1.</p>
Delivery	<p>Site category 3.</p> <p>Likely to commence in short-term subject to planning consent.</p> <p>The SHLAA indicated potential for delivery in the short-term.</p> <p>Site has application currently being considered in addition to an application to relocate the existing rugby pitch and facilities.</p>
Availability	<p>Site controlled by a developer and submitted to local plan making process.</p>

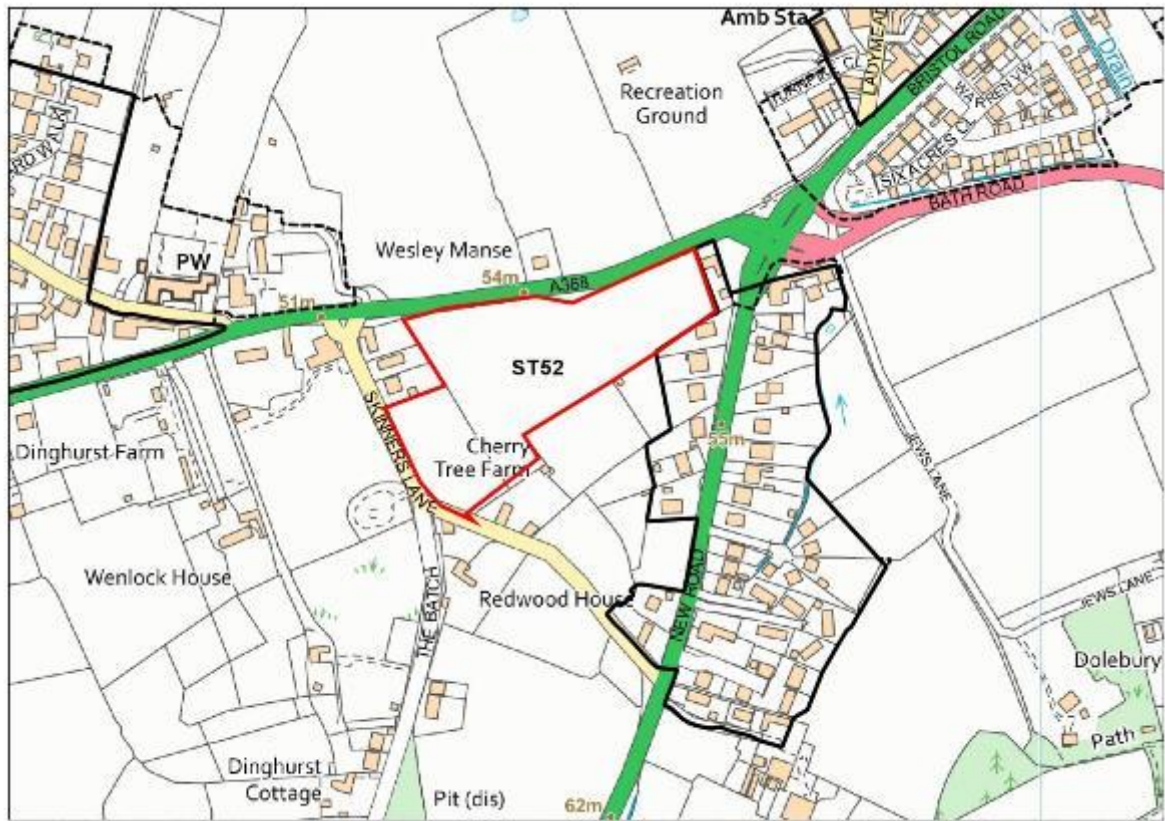
Site reference	<b>ST51</b>	<b>Category 3</b>
Site name	North of Pudding Pie Lane	
Associated settlement	Landford and Churchill	



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Suitability	<p>Site is identified as potential in the SHLAA (site ref: HE201074) for 72 units and is a draft housing allocation in the emerging local plan for 65 units (see CD 8.23 page 127)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 3.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. As the SHLAA identifies the site as potential, there are no overriding constraints identified.</p> <p>SHLAA indicated potential for delivery in the short-term.</p>
Availability	<p>Site has been submitted to the emerging local plan process indicating its availability.</p>

Site reference	<b>ST52</b>	<b>Category 1</b>
Site name	Skinners Lane	
Associated settlement	Landford and Churchill	

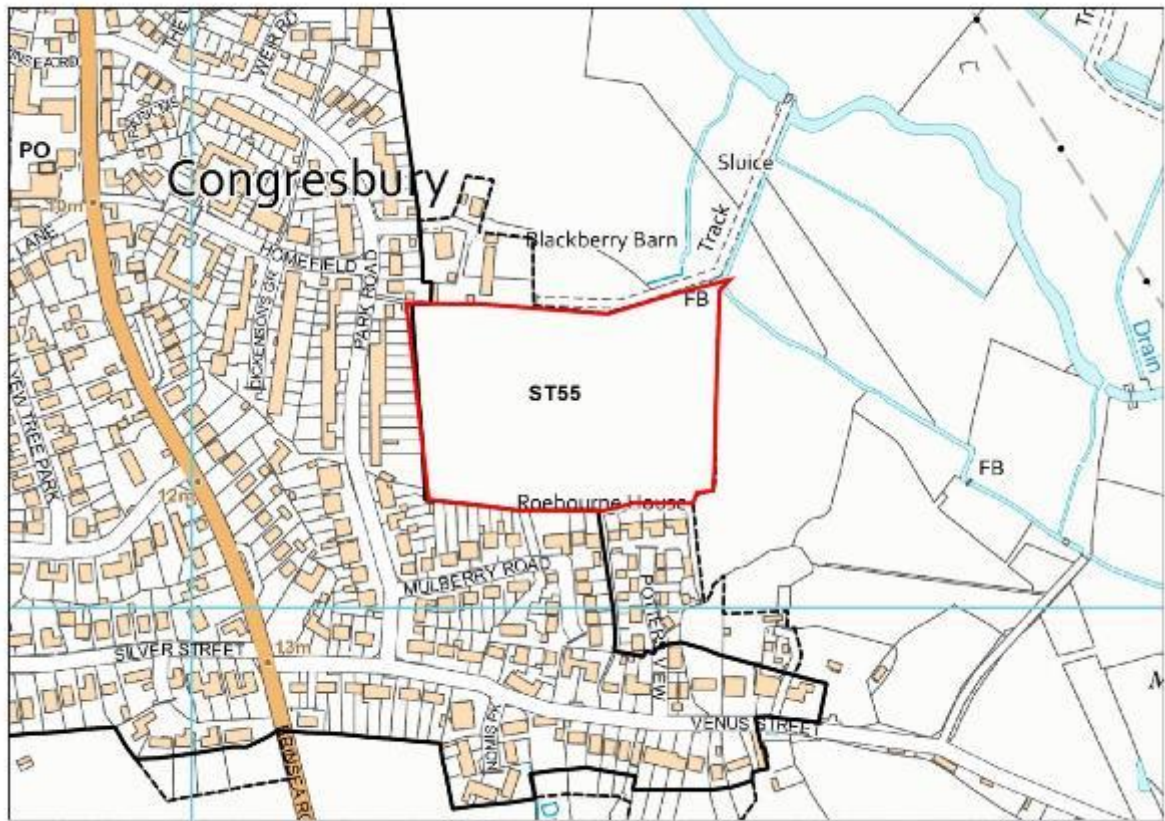


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Suitability	<p>Site has planning consent for 25 units (application ref: 22/P/2991/RM)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. The appellant's assessment rejects the site as being too small and because it is likely to be built out by another developer. However, these are not reasons to reject other sites where they clearly represent 'reasonably available' alternatives that are capable of accommodating residential development.</p>
Availability	<p>As per planning application.</p>



Site reference	<b>ST55</b>	<b>Category 3</b>
Site name	Land east of Congresbury	
Associated settlement	Congresbury	



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Suitability	<p>Site is identified as potential in the SHLAA (site ref: HE2010375) for 98 units and is a draft housing allocation in the emerging local plan for 90 units (see CD 8.23 page 130)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 3.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. The appellant rejects the site as not being available however this is not a requirement.</p> <p>Site has current application for up to 90 units being considered.</p>
Availability	<p>Site has been submitted to the emerging local plan process and there is a current application being considered.</p>

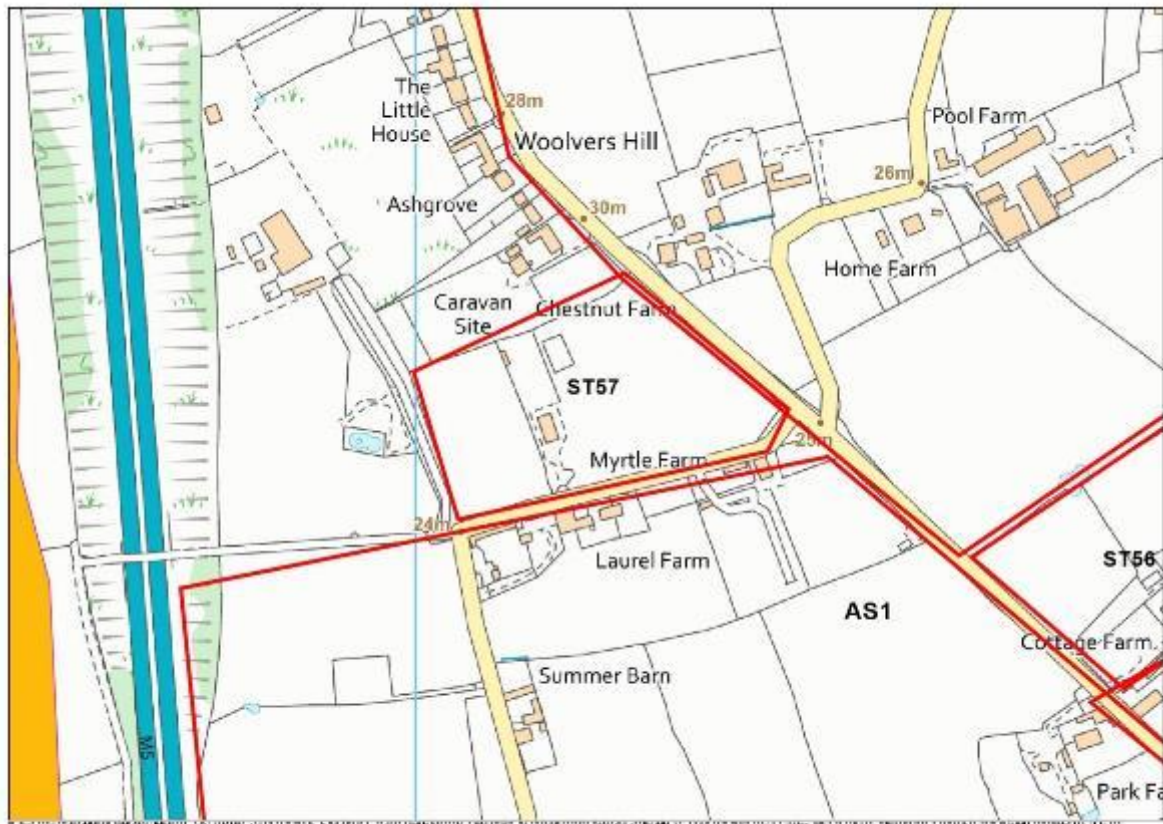
Site reference	<b>ST56</b>	<b>Category 5</b>
Site name	Land east of Wolvershill Road	
Associated settlement	New proposed settlement	



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Suitability	<p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE201034) for 84 units.</p> <p>The site is part of a large-scale proposed allocation (Wolvershill – north of Banwell) for residential (2,800 units) in the emerging local plan – see CD 8.23, page 112.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Potential to commence in the short term linked to a wider phasing strategy for the Wolvershill development. The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. Banwell Bypass recently granted planning consent.</p>
Availability	<p>The site was submitted to the 2020 local plan call for sites for residential consideration with a submitted capacity of 130 units.</p>

Site reference	<b>ST57</b>	<b>Category 5</b>
Site name	Summer Lane	
Associated settlement	New proposed settlement	



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Suitability	<p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE20592) for 70 units.</p> <p>The site is part of a large-scale proposed allocation (Wolvershill – north of Banwell) for residential (2,800 units) in the emerging local plan – see CD 8.23, page 112.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Potential to commence in the short term linked to a wider phasing strategy for the Wolvershill development. The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. Banwell Bypass recently granted planning consent.</p>
Availability	<p>Site has been submitted to the local plan making process by way of submission to the Preferred Options consultation in the spring of 2022.</p>

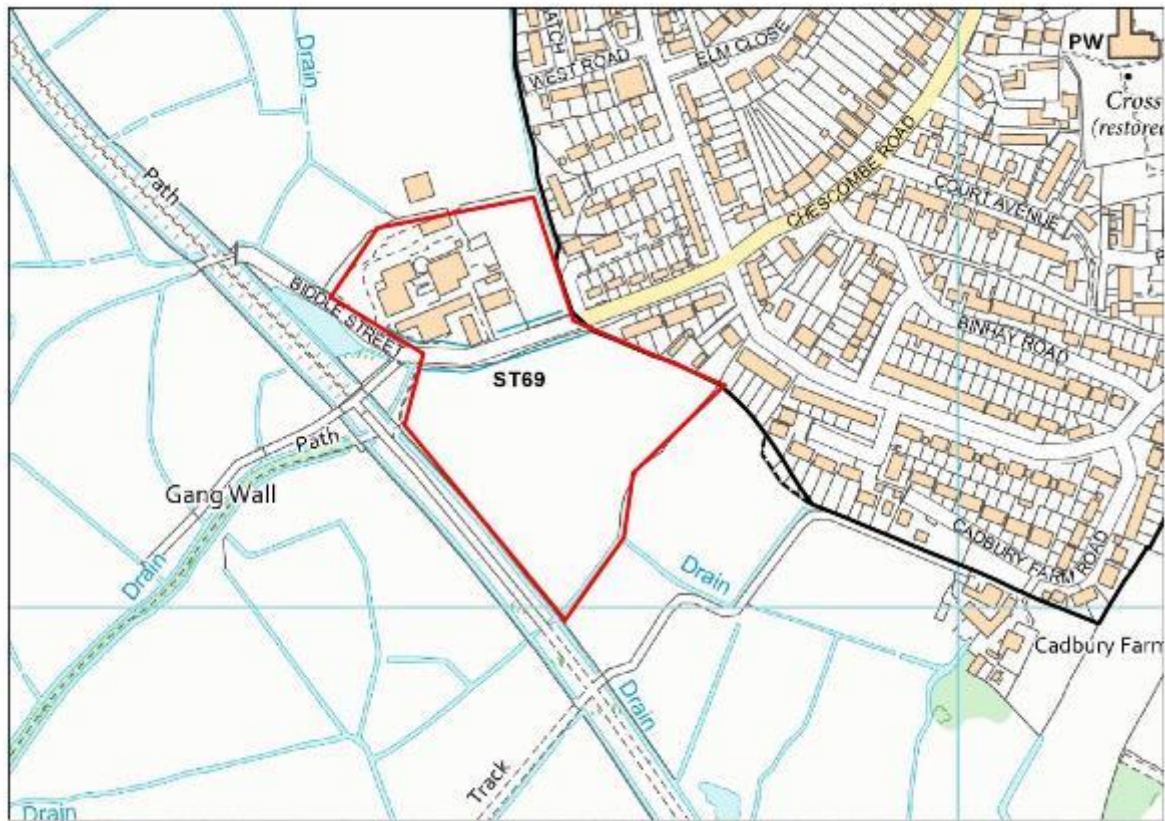
Site reference	<b>ST68</b>	<b>Category 1</b>
Site name	Land at Farleigh Farm	
Associated settlement	Backwell	



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Suitability	<p>Site has planning consent for up to 125 units having been allowed at appeal (application ref: 21/P/1766/OUT)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. The sole reasoning in the appellant's assessment is that the site is being delivered by another developer however this is not a reason to reject sites.</p>
Availability	<p>As per planning application. Site controlled by a developer and submitted to the 2020 call for sites.</p>

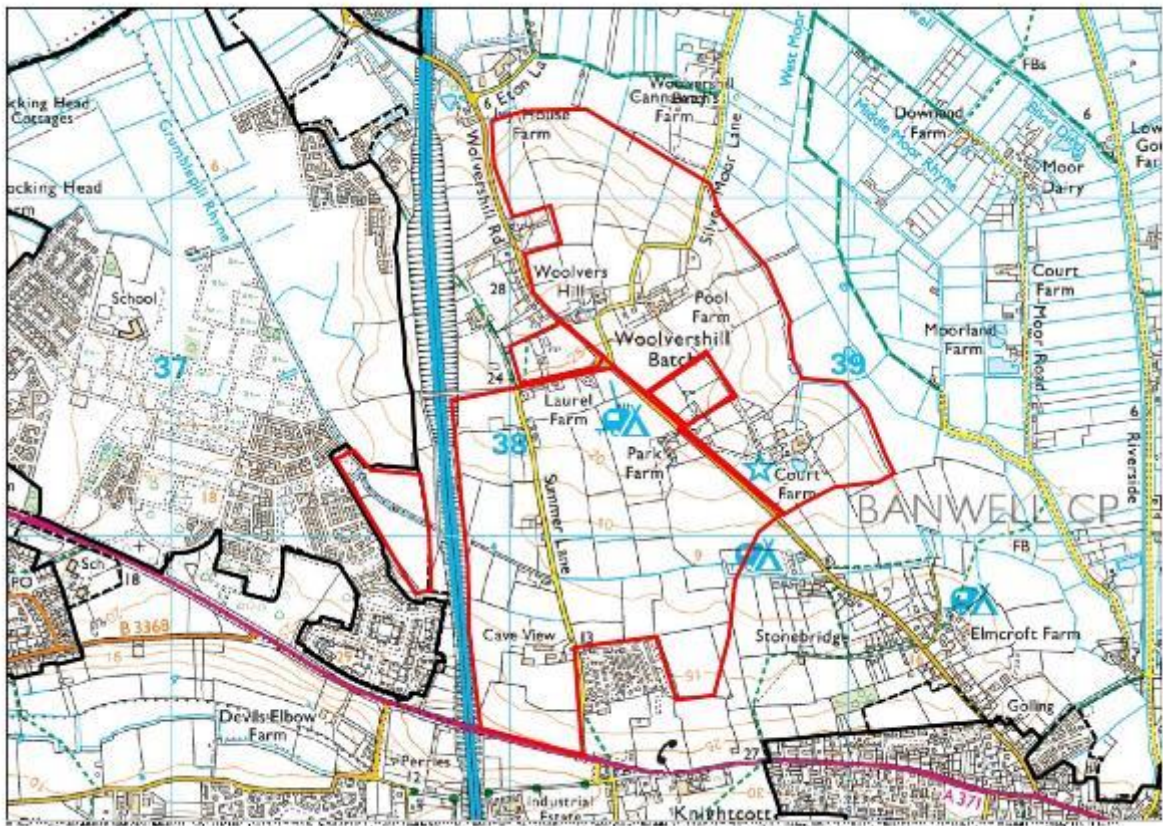
Site reference	<b>ST69</b>	<b>Category 1</b>
Site name	Land at Rectory Farm	
Associated settlement	Yatton	



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Suitability	<p>Site has planning consent for up to 100 units having been allowed at appeal (application ref: 21/P/0236/OUT)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 1.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term. The sole reasoning in the appellant's assessment is that the site is being delivered by another developer however this is not a reason to reject sites.</p> <p>Reserved Matters currently being considered (application ref: 23/P/0238/RM).</p>
Availability	<p>As per planning application.</p>

Site reference	<b>AS1</b>	<b>Category 5</b>
Site name	Wolvershill Strategic Growth Area	
Associated settlement	New proposed settlement	



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Suitability	<p>This strategic site is an emerging allocation for a new settlement close to WsM and the settlement of Banwell. Draft Policy LP1 of the emerging local plan (CD 8.23) provides an overarching policy for the proposal.</p> <p>The site is identified within Category 5 indicating it to be in conflict with the current Development Plan. However draft allocations and land availability information generally should not be ruled out in line with national guidance (CD 8.25)</p>
Delivery	<p>Potential for phases to commence in the short term linked to a wider phasing strategy for the Wolvershill development. The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. Banwell Bypass recently granted planning consent.</p>
Availability	<p>The vast majority of the land forming part of the allocation is assembled and controlled by a developer and two land promoters. In addition, there are a smaller range of parcels controlled by other parties and these have been made available to the local plan through submissions to the latest call for sites and to local plan consultations.</p>

Site reference	<b>AS2</b>	<b>Category 5</b>
Site name	Land at Mead Farm	
Associated settlement	Sandford	



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Suitability	<p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE2075) for 30 units.</p> <p>The site is a proposed allocation (<i>same name</i>) for residential (30 units) in the emerging local plan – see CD 8.23, page 131.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. The sites submission to the plan making process, identification as potential in SHLAA, and draft allocation indicate a reasonable prospect that site could be available in short-term.</p>
Availability	<p>Site submitted to the local plan process for 30 units.</p>

Site reference	<b>AS3</b>	<b>Category 5</b>
Site name	Land west of Sandford	
Associated settlement	Sandford	

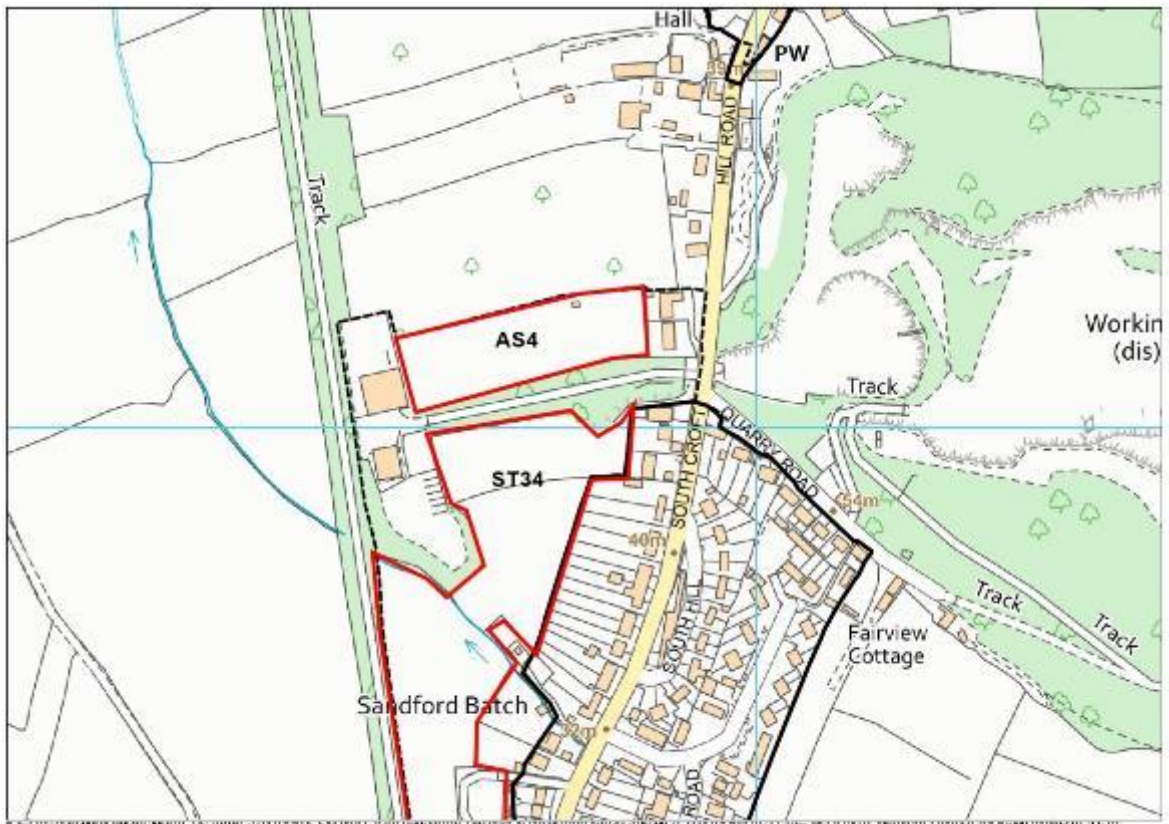


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Suitability	<p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE201012) for 23 units.</p> <p>The site is a proposed allocation (<i>same name</i>) for residential (18 units) in the emerging local plan – see CD 8.23, page 131.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. The sites submission to the plan making process, identification as potential in SHLAA, and draft allocation indicate a reasonable prospect that site could be available in short-term.</p>
Availability	<p>Site submitted to the local plan process for 18 units.</p>



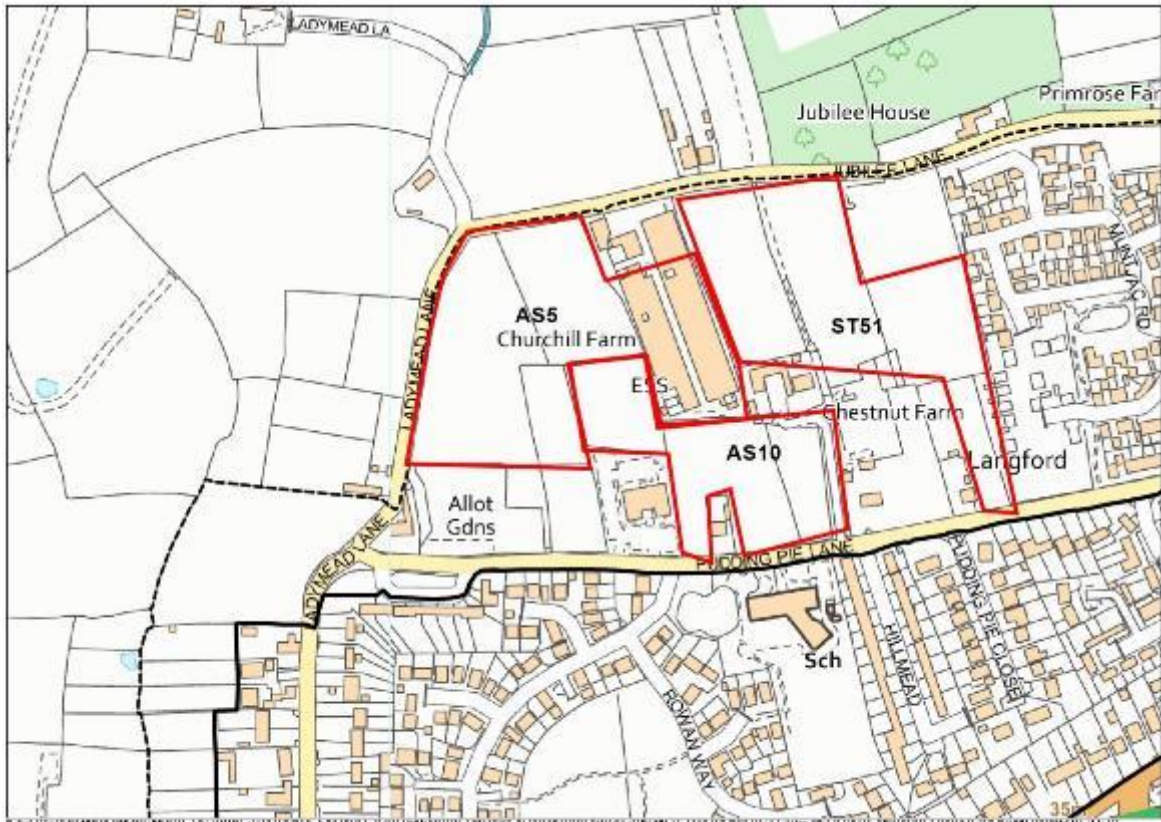
Site reference	<b>AS4</b>	<b>Category 5</b>
Site name	West of Hill Road	
Associated settlement	Winscombe	



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Suitability	<p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE2076) for 32 units.</p> <p>The site is a proposed allocation (<i>same name</i>) for residential (30 units) in the emerging local plan – see CD 8.23, page 133.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. The sites submission to the plan making process, identification as potential in SHLAA, and draft allocation indicate a reasonable prospect that site could be available in short-term.</p>
Availability	<p>Site submitted to the local plan process for 30 units.</p>

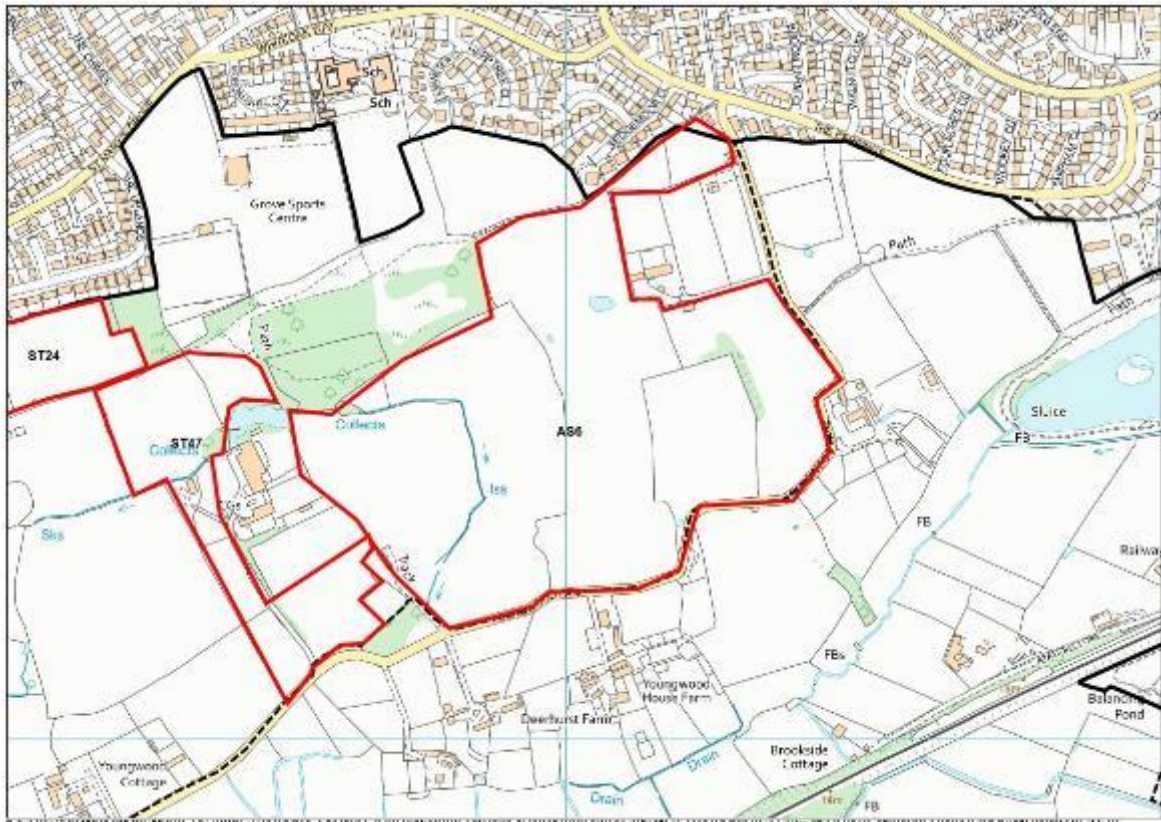
Site reference	<b>AS5</b>	<b>Category 5</b>
Site name	Land east of Ladymead Lane	
Associated settlement	Langford and Churchill	



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Suitability	<p>The site is a potential candidate for consideration as part of the emerging North Somerset local plan, having been identified as potential within the SHLAA (site ref: HE2023) for 90 units.</p> <p>The site is a proposed allocation (<i>same name</i>) for residential (70 units) in the emerging local plan – see CD 8.23, page 127.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>The site would currently be in conflict with the Core Strategy housing distribution policies (CS33). It therefore requires the new local plan to gain greater weight/ become adopted. Para 48 of the Framework advises that LPA may give weight to emerging plans subject to certain criteria being met. The sites submission to the plan making process, identification as potential in SHLAA, and draft allocation indicate a reasonable prospect that site could be available in short-term.</p>
Availability	<p>Site submitted to the local plan process for 90 units.</p>

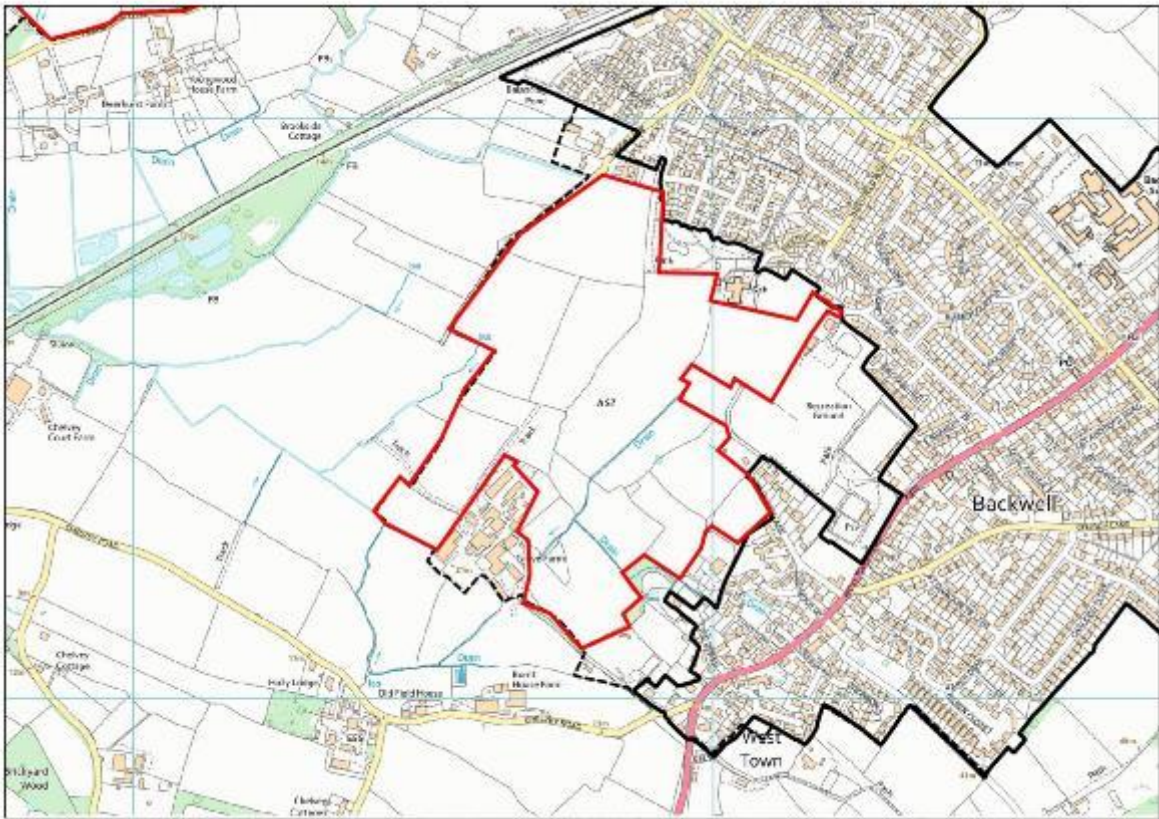
Site reference	<b>AS6</b>	<b>Category 3</b>
Site name	North and south of Youngwood Lane	
Associated settlement	Nailsea	



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Suitability	<p>Site is identified as potential in the SHLAA (site ref: HE20612) for 316 units and forms the majority part of a draft housing allocation in the emerging local plan for 600 units (see CD 8.23 page 118)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Reasonable prospect that the site is available to be developed for housing in short-term. The allocation is for a larger site that would require strategic transport infrastructure to facilitate. This may make the larger site a longer-term prospect, however smaller phases may be deliverable in the shorter-term.</p>
Availability	<p>Site has been promoted through the emerging local plan and the promoter has carried out local consultation in the autumn of 2022.</p>

Site reference	<b>AS7</b>	<b>Category 3</b>
Site name	Grove Farm	
Associated settlement	Backwell	



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Suitability	<p>Site is identified as potential in the SHLAA (site ref: HE20595) for 475 units and forms the majority part of a draft housing allocation in the emerging local plan for 600 units (see CD 8.23 page 123)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>A smaller parcel of the development has already commenced for 65 residential units – land at Rodney Road.</p> <p>The entirety of the larger site requires the adoption of the new local plan however there is a reasonable prospect that units could be delivered in the short-term.</p>
Availability	<p>Site has been promoted through the emerging local plan and is controlled by a developer.</p>

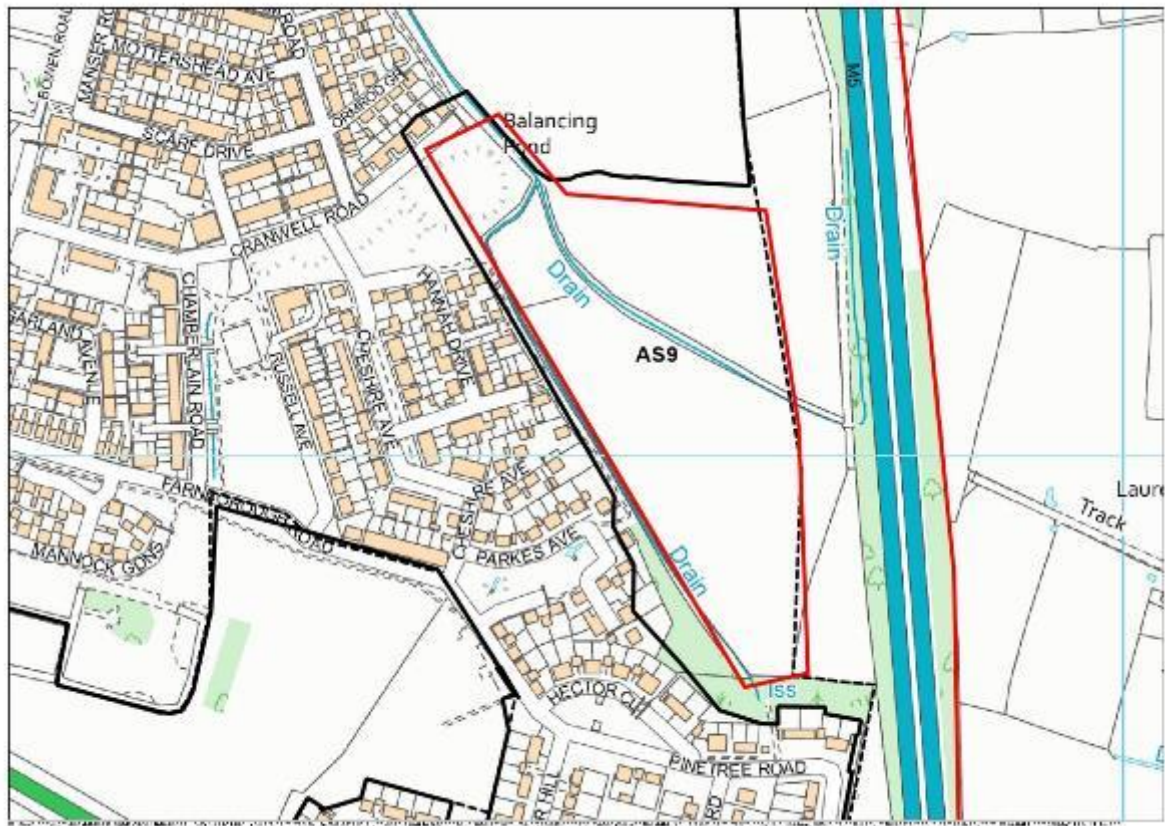
Site reference	<b>AS8</b>	<b>Category 1</b>
Site name	Greenhill Road	
Associated settlement	Sandford	



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Suitability	<p>Site has resolution to approve for up to 49 units (application ref: 22/P/0227/OUT)</p> <p>Site is in flood zone 1.</p>
Delivery	Reasonable prospect that the site is available to be developed for housing in short-term.
Availability	<p>As per planning application.</p> <p>Site submitted to local plan process.</p>

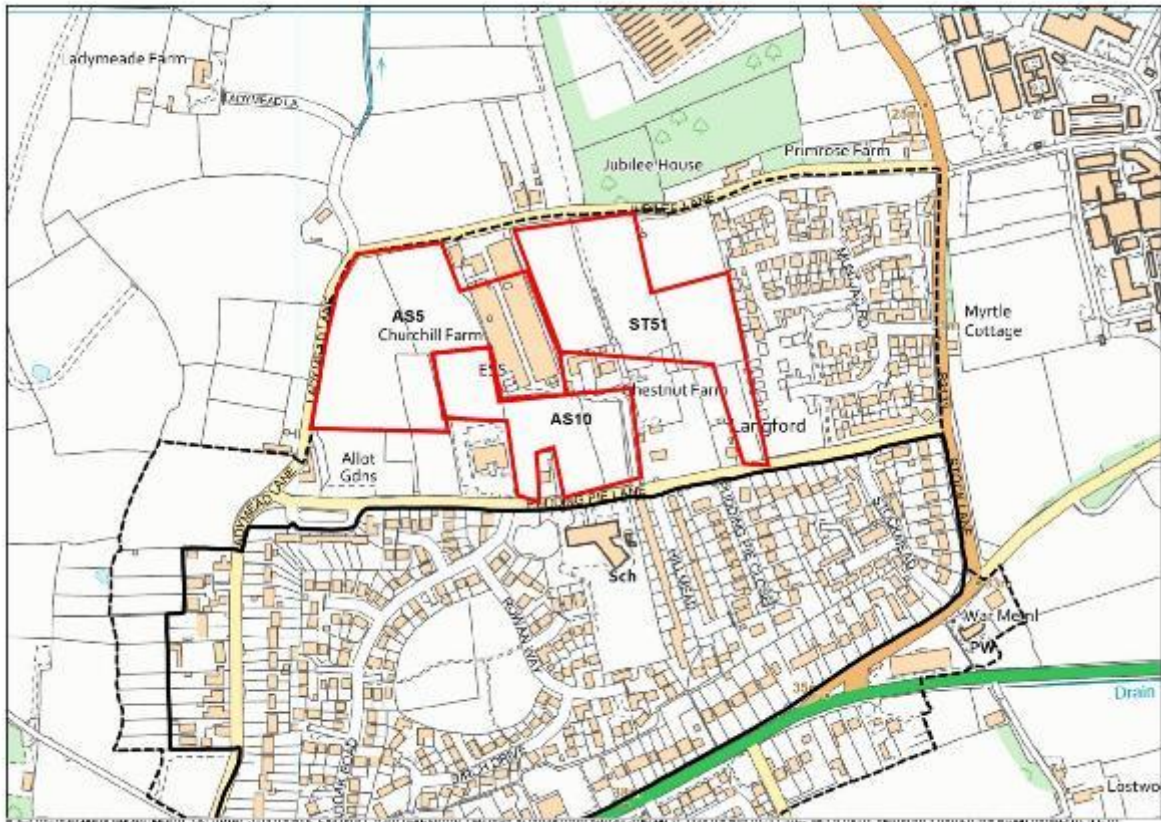
Site reference	<b>AS9</b>	<b>Category 1</b>
Site name	Land west of Trenchard Road	
Associated settlement	Weston-super-Mare	



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Suitability	<p>Site has planning consent for up to 75 units (application ref: 18/P/3038/OUT)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Reasonable prospect that the site is available to be developed for housing in short-term.</p> <p>Various applications approved to discharge conditions.</p>
Availability	As per planning application.

Site reference	<b>AS10</b>	<b>Category 3</b>
Site name	Pudding Pie Lane (west)	
Associated settlement	Langford and Churchill	



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Suitability	<p>Site is a draft housing allocation in the emerging local plan for 35 units (see CD 8.23 page 128)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 3.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term.</p>
Availability	<p>Site had consent for 35 dwellings that has since expired. However there is no indication that the site is unavailable.</p>

Site reference	<b>AS11</b>	<b>Category 3</b>
Site name	Weston College Site	
Associated settlement	Nailsea	

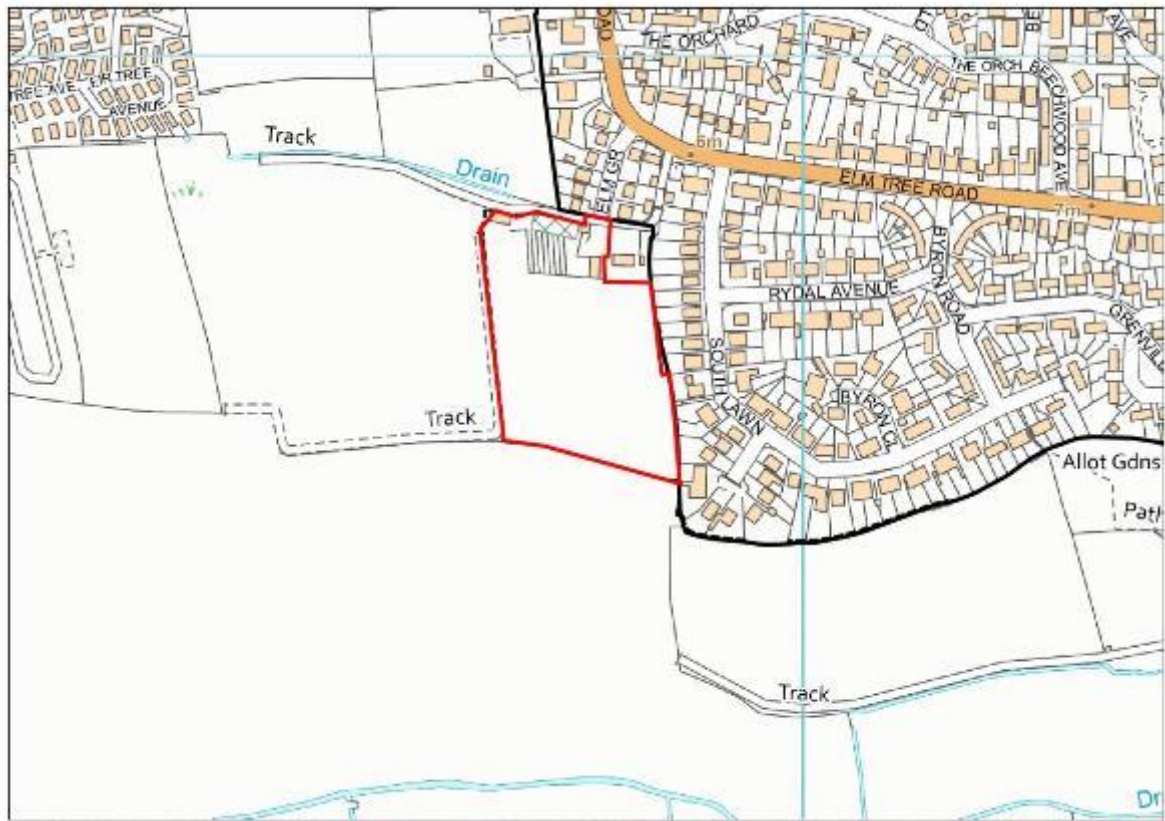


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Suitability	<p>Site is a draft housing allocation in the emerging local plan for 28 units (see CD 8.23 page 121)</p> <p>The site is an urban regeneration site located within the Town Centre of Nailsea.</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Site category 3.</p> <p>Reasonable prospect that the site is available to be developed for housing in short-term.</p>
Availability	<p>Site owned by a developer.</p>



Site reference	<b>AS12</b>	<b>Category 3</b>
Site name	Elm Grove Nursery	
Associated settlement	Locking	



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Suitability	<p>Site is identified as part of a larger site as potential in the SHLAA (site ref: HE207) for 65 units and a draft housing allocation in the emerging local plan for 50 units (see CD 8.23 page 112)</p> <p>Site is in flood zone 1.</p>
Delivery	<p>Reasonable prospect that the site is available to be developed for housing in short-term.</p> <p>The site could come forward in line with the current Development Plan. The emerging local plan is also in preparation and once adopted, could facilitate development of the site in the short-term.</p>
Availability	<p>The site is known to be available being submitted to the new local plan Challenges and Choices consultations.</p>

**Appendix MH3:** Analysis of appeal proposal against sustainability appraisal objectives

Appendix MH3 provides an assessment of the appeal site against the Core Strategy Sustainability Appraisal objectives as a local frame of reference for sustainable development. Paragraphs 5.50 and 5.51 of my proof of evidence summarises the assessment findings.

<b>Environmental</b> – protecting and managing the natural/cultural resource base of economic and social development	<b>Assessment of appeal proposal against the SA objectives</b>
EN1. Maximise self-containment of the urban areas.	<b>Negligible effect/ Poor/ no alignment to objective</b> – the proposal is outside of the urban area of WsM.
EN2. Minimise average travel-to-work distance.	<b>Negligible effect/ uncertain–</b> additional speculative housing in this location may contribute to car-based commuting to larger economic centres such as Bristol as has been a particular concern in WsM historically. Conversely WsM is the main urban centre where there are employment opportunities.
EN3. Limit rural development to that meeting local needs, or infrastructure needs unavoidably requiring a rural location.	<b>Alignment to objective/ negligible effect</b> - Potentially beneficial effect given location adjacent to the largest town in North Somerset although benefit would be greater if the proposal was within the urban area extents. Benefit should not however be overstated.

<p>EN4. Minimise loss of productive land, especially best and most versatile farmland.</p>	<p><b>Poor/ no alignment to objective –</b> proposal is in conflict with objective as part of the appeal site is indicated to be within Grade 2 of the Agricultural Land Classification.</p>
<p>EN5. Minimise flood risk.</p>	<p><b>Poor/ no alignment to objective -</b> In conflict with objective due to high-probability flood risk status.</p>
<p>EN6. Promote sustainable drainage and protect existing permeable surfaces.</p>	<p><b>Negligible effect -</b> Overall in conflict with objective as proposal seeks to develop currently greenfield/ permeable land. This is only partly countered by the provision of sustainable drainage features.</p>
<p>EN7. Enable design to minimise resource use and contribution to greenhouse gas emissions.</p>	<p><b>Negligible effect/ uncertain –</b> as the proposal is in outline, there is minimal detail to clearly confirm any alignment with this objective. Note that the Councils Flood Risk Advice Note advises against the energy-efficient design of buildings as a means of justifying the Exceptions Test.</p>
<p>EN8. Enable design to take account of higher temperatures and more extreme weather conditions.</p>	<p><b>Poor/ no alignment to objective -</b> In conflict with objective – developing in a high-risk flood location where it is likely to be at greater risk in future where climate change has a direct relationship to increasing extreme weather and associated flood risk.</p>

EN9. Increase the life expectancy of buildings.	<b>Poor/ no alignment to objective -</b> In conflict with objective as flood risk increases over time. Whilst measures to mitigate impacts may be conditioned e.g. safe refuges, these do not protect the buildings themselves. See evidence of Mr Bunn for the Council, para 2.7.12.
EN10. Achieve a net gain in cultural, heritage and landscape features and biodiversity of North Somerset.	<b>Poor/ no alignment to objective-</b> no alignment is present to this objective.
EN11. Avoid major development in the most environmentally sensitive areas.	<b>Poor/ no alignment to objective -</b> In conflict with objective as this location is environmentally sensitive due to flood risk status.
EN12. Avoid damage to irreplaceable valued features.	<b>Negligible effect -</b>
<b>Economic – promoting more sustainable patterns of production and consumption</b>	
EC1. Meet economic development needs, including sufficient new jobs to at least match the increase in homes.	<b>Poor/ no alignment to objective –</b> no economic development land uses proposed. Exceeding the planned housing provision in the area may exacerbate the imbalance between jobs and homes.
EC2. Harness the particular economic opportunities of North Somerset.	<b>Poor/ no alignment to objective –</b> no alignment identified.
EC3. Protect and expand opportunities for local businesses to utilise local resources, especially sustainable resources.	<b>Poor/ no alignment to objective –</b> no alignment identified.
EC4. Maximise opportunities for regeneration and renewal within Weston-super-Mare,	<b>Poor/ no alignment to objective -</b> In conflict with objective – proposal

ahead of new development, especially ahead of major new housing.	does not reflect priority to brownfield sites in WsM as set out in CS28.
EC5. Avoid prejudicing, by phasing or otherwise, the achievement of other sustainable development objectives for regeneration and quality of life.	<b>Poor/ no alignment to objective -</b> In conflict with objective – proposal hampers achievement of objective of minimising development in flood risk areas that may impact on quality of life. Proposal also does not support regeneration.
EC6. Increase prosperity, especially in areas of concentrated disadvantage.	<b>Poor/ no alignment to objective –</b> The appeal site location is not in an area of concentrated disadvantage.
EC7. Make fuller use of urban spaces and promote a balanced night-time economy in town centres.	<b>Poor/ no alignment to objective -</b> No clear benefit identified – the appellant has referred to a benefit of the proposal being increased spend in the local economy. This has the potential to support the night-time economy, but the benefit is likely to be very marginal.
EC8. Diversify employment structure, improve choice of employment and produce greater opportunities to participate in society, paid or unpaid.	<b>Poor/ no alignment to objective –</b> no alignment identified.
EC9. Increase ability to work from home.	<b>Poor/ no alignment to objective/ negligible effect -</b> any residential proposal could facilitate this objective especially where there is good communications infrastructure to facilitate homeworking. There is nothing particular about the proposal that supports the objective.

EC10. Protect and expand genuine opportunities for small businesses.	<b>Poor/ no alignment to objective –</b> no alignment identified.
EC11. Reduce queuing and over-crowding on the road and rail networks.	<b>Poor/ no alignment to objective –</b> no alignment identified.
EC12. Locate new development on sites – and access them in ways – that will not add to traffic congestion.	<b>Poor/ no alignment to objective -</b> Although the proposal has an associated trip generation this is unlikely to have a significant detrimental impact on local highway conditions <sup>2</sup> .
<b>Social – widening opportunities for all individuals and communities</b>	
SC1. Meet local needs locally.	<b>Alignment to objective / negligible effect</b> – Insofar as new residents of the appeal properties have access to a range of services and facilities in WsM. However, there is limited benefit identified to the existing community as is required in part (a) of the Exceptions Test. Some of the facilities provided with the scheme, e.g. the equipped children’s play area would assist in providing additional local access to play equipment, although this provision is required to meet the additional needs generated by the development.
SC2. Improve accessibility to service, retail, educational, leisure and social provision.	<b>Alignment to objective -</b> Potential alignment as proposal is located adjacent to a main town/ service centre.

<sup>2</sup> Formal comments of NSC Highways Development Management 04/09/20

SC3. Increase opportunities for active lifestyles and sustainable outdoor leisure pursuits.	<b>Negligible effect</b> – provision of play equipment supports active lifestyles, but overall benefit is considered marginal.
SC4. Develop a positive sense of place both physically and socially.	<b>Negligible effect</b> – Proposal is in outline and any potential alignment to this objective is considered marginal.
SC5. Promote positive wellbeing.	<b>Poor/ no alignment to objective</b> - Potentially In conflict with objective – taking into account potential for flooding.
SC6. Reduce health inequalities.	<b>Poor/ no alignment to objective</b> – no alignment identified.
SC7. Reduce crime and fear of crime, likewise anti-social behaviour.	<b>Negligible effect/ no alignment to objective</b> – no alignment identified.
SC8. Minimise risk to health and safety.	<b>Poor/ no alignment to objective</b> - Potentially In conflict with objective – taking into account potential for flooding.
SC9. Avoid exposure to pollution/noise.	<b>Poor/ no alignment to objective</b> – no alignment identified.
SC10. Meet housing requirement.	<b>Alignment to objective</b> - however, residential proposed in this instance is not considered sustainable given the flood risk present. In addition housing requirements identified for the town of WsM have already been catered for in completions and commitments (see para 5.11 of my proof of evidence).
SC11. Narrow the gap between income and house prices/rents.	<b>Negligible effect/ no alignment to objective</b> - no alignment identified.

SC12. Improve the life chances of those living in areas of concentrated disadvantage	<b>Negligible effect/ no alignment to objective</b> - no alignment identified.
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