

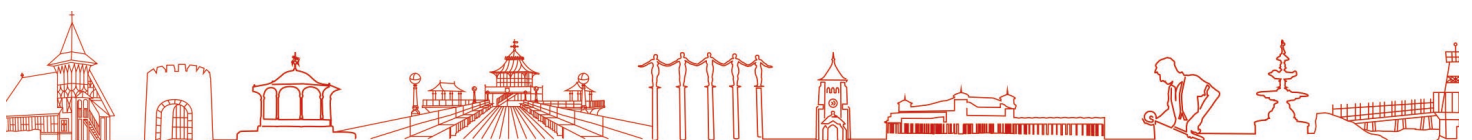


**North Somerset Local Plan 2039**

# **Spatial strategy and capacity**

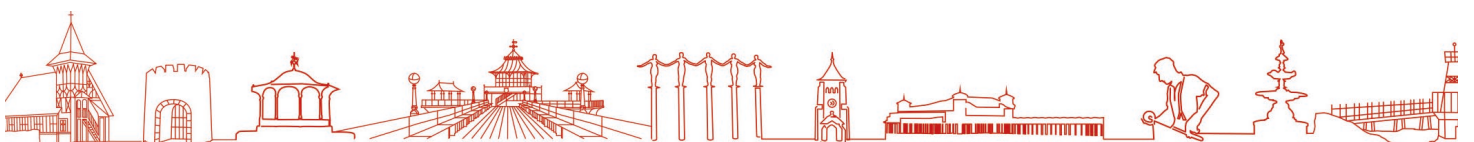
**Pre-submission  
(Regulation 19) plan**

**November 2023**



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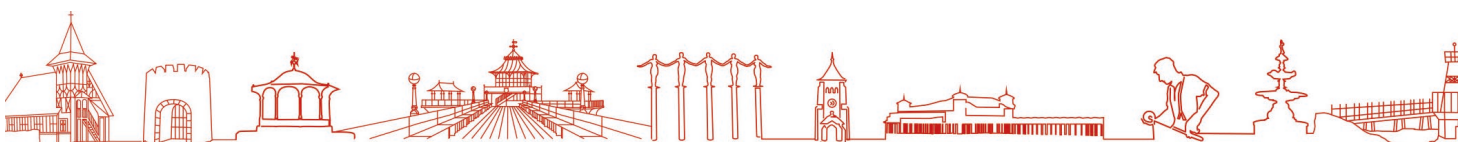


# 1. Introduction

- 1.1 A spatial strategy and capacity paper was published in February 2022 to accompany the Preferred Options. This document explained the approach taken in the plan making process to the spatial strategy, sequential approach, and the methodology used in assessing potential delivery.
- 1.2 The purpose of this paper is to update the position in respect of the Pre-submission (Regulation 19 version).
- 1.3 The Local Plan's vision, strategic priorities, sustainability objectives and spatial strategy were developed through the Challenges for the future and Choices for the future consultations and set out in Preferred Options. These were reviewed in the light of responses received to the consultation, new evidence and the proposed national planning reforms but are considered to remain a robust framework for the preparation of the pre-submission plan.
- 1.4 A sequential approach was identified to act as a framework for the assessment of potential sites, consistent with the spatial strategy. This is a tool to aid site selection through a set of sequential steps. The approach used in the early stages of plan making comprised seven steps. This has now been reduced to six by the amalgamation of 'other sustainable settlements' (Yatton and Backwell) into the 'rural areas' category alongside the other villages. The sequential steps are now as follows:

Step 1: Existing planning permissions
Step 2: Urban capacity
Step 3: Town expansion
Step 4: Rural areas
Step 5: Other opportunities
Step 6: Green Belt

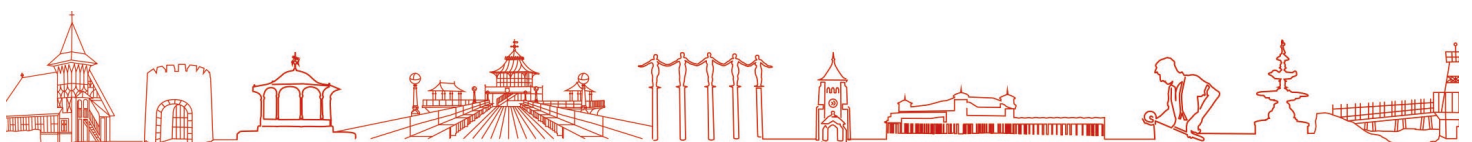
- 1.5 Sites identified through SHLAA as having available potential are assessed through this framework with preference given to sequentially preferable locations as these better reflect the spatial strategy and therefore the delivery of a sustainable pattern of development. The starting point is to maximise development within the towns, then consider



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opportunities well-related to the urban areas and then the villages (with a preference given to the relatively more sustainable settlements). If additional growth is needed then the next step is to consider any other opportunities such as development in areas at risk of flooding or new settlements, before finally considering any opportunities within the Green Belt given national policy advice on their importance.

- 1.5 The paper will set out how the government's proposed changes to introduce more flexibility in terms of the identification of the housing requirement and greater protection for Green Belt have impacted on plan making. It will explain how national planning reforms, along with updates to the evidence and consideration of sustainability impacts have influenced the emerging local plan and resulted in the current approach.

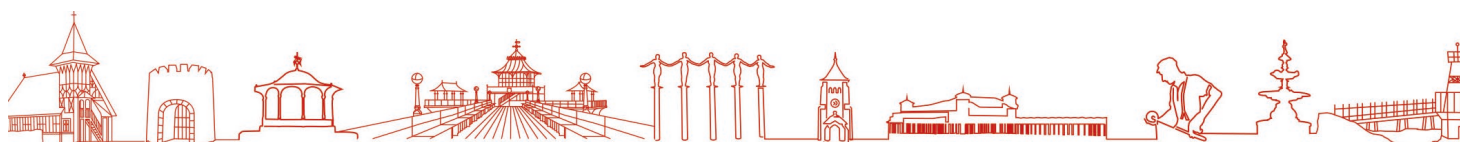


## 2. National policy changes

- 2.1 Executive Committee considered the response to the Preferred Options consultation and the principal issues to be addressed in the next stage of plan making on 7 September 2023 where it was resolved that:

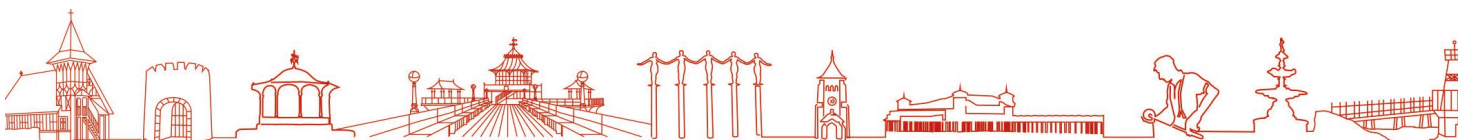
*‘The Executive requests that officers proceed to develop a revised Local Plan that recognises the constrained nature of North Somerset and identifies an appropriate scale and location of development to offer greater protection to the Green Belt and other sensitive sites, and seek legal advice including advice on implications for the Local Plan timetable and anticipated national reforms, further evidence gathering, potentially including further consultation, in order to prepare the strongest possible pre-submission draft plan.’*

- 2.2 That approach resonated with the national debate which was taking place on the role of planning and the scale and location of new development. At the end of 2022 the government launched a consultation on national planning reforms, including proposed changes to the National Planning Policy Framework. This consultation had significant implications for the North Somerset Local Plan.
- 2.3 In relation to the housing requirement, the consultation sought views on whether there should be more scope for local planning authorities to work on the basis of a locally derived housing requirement as opposed to using the government’s standard method, provided any alternative target was robustly evidenced.
- 2.4 North Somerset Council, working jointly with the West of England authorities, commissioned a review of local housing need. This recommended that for North Somerset a robust approach would be to use a local housing need of 993 dwellings per year or 14,902 dwellings over the plan period 2024-2039 (ORS 2023). Executive Committee on 6 September 2023 resolved that the local plan should be progressed on the basis of a locally derived housing requirement.
- 2.5 NPPF paragraph 61 permits departing from the standard method if exceptional circumstances justify an alternative approach which reflects demographic trends and market signals. ORS advised that the standard method does not provide a realistic assessment of local housing need for North Somerset, as the outdated 2014 household projections that are the starting point for the calculation do not provide an accurate reflection of current and future demographic trends. Their alternative calculations concluded that a locally derived housing requirement of 14,902 will meet household growth in full and also incorporates an uplift that provides a positive response to market signals.



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- 2.6 The national consultation also sought views on how nationally significant designations such as Green Belt should be assessed, particularly whether local planning authorities should feel compelled to use Green Belt to meet housing targets. North Somerset has a significant extent of Green Belt (40%) as well as other sensitive areas such as areas at risk of flooding (35%), the Mendip Hills Area of Outstanding Natural Beauty (15%) and a range of heritage, ecological and other environmental constraints.
- 2.7 Given the government's re-emphasis on the importance of Green Belt, the proposed Green Belt allocations were reviewed.
- 2.8 As the plan making process had commenced during the pandemic, there was uncertainty about the robustness of economic forecasts. Following Preferred Options, the evidence base relating to the employment requirement was revised using updated economic forecasts (North Somerset Sites and Premises Evidence, Hardisty Jones Associates 2023). This indicated the minimum overall scale of employment land required for the local plan period was around 50ha.

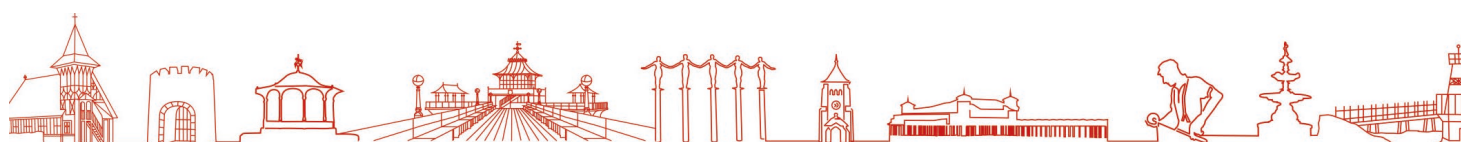


### 3. Green Belt and strategic growth locations

3.1 The Preferred Options proposed three strategic growth locations at Weston-super-Mare (Wolvershill), Nailsea/Backwell and in the Green Belt adjacent to Bristol (Yanley Lane). The appropriateness of allocating Green Belt has been reviewed in the light of the government’s current advice. In addition, further technical work has concluded that the scale of growth at Nailsea/Backwell is constrained by the lack of deliverability of essential strategic transport mitigations.

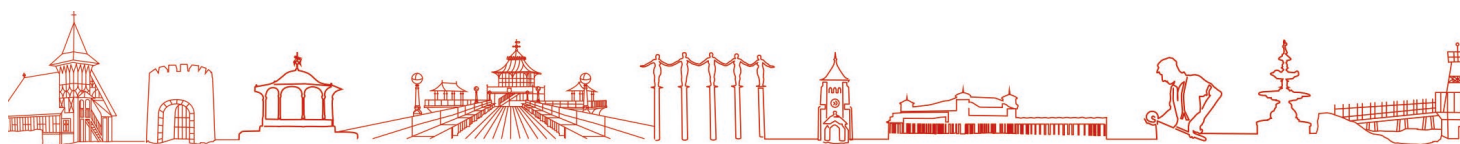
3.2 The government consultation on proposed planning reforms reinforced the importance which should be accorded to Green Belt, and that local planning authorities should not be compelled to allocate Green Belt sites to meet their housing requirements. In terms of the impact of the four sites identified in Preferred Options on Green Belt purposes, the evidence had concluded as follows (Green Belt Review January 2022). It should be noted that the Yanley Lane site covers two separate Green Belt parcels.

Allocation	Green Belt parcel	GB purpose: Sprawl	GB purpose: Merger	GB purpose: Encroachment	GB purpose: Setting historic towns	GB purpose: Regeneration	Overall assessment
Yanley Lane (Woodspring golf course)	10. Woodspring golf club	Mod/High	Low	Mod/High	Low	Neutral	<b>Mod/High</b>
Yanley Lane (Woodspring golf course)	11. Castle Farm area	High	Low	High	Low	Neutral	<b>High</b>
Colliter's Way	12. Inside the SBL south	Mod	Low	Miod	Low	Neutral	<b>Mod/Low</b>
East of Backwell	5. Land East of Backwell School to Backwell Green	Low	High	Mod/High	Low	Neutral	<b>Moderate</b>
Clevedon Road, Portishead	3, South of Gordano School	Low	Low	Mod/Low	Low	Neutral	<b>Low</b>



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- 3.3 The Preferred Options proposed that, given the size of the standard method housing target, it was necessary to use Green Belt sites. As greater importance is now placed on protecting Green Belt, the weight given to these sites in terms of meeting Green Belt purposes was re-evaluated. Given the importance of the Yanley Lane (assessed as high and moderate/high in terms of impact on Green Belt purposes) and East of Backwell (moderate), the planning judgement is now that they should be retained as Green Belt.
- 3.4 Although the Clevedon Road, Portishead proposed allocation is assessed for Green Belt purposes as having low impact, updated evidence in relation to flood risk associated with climate change now indicates most of the site is impacted. The site is therefore not carried forward as a proposed allocation, as it conflicts with the spatial strategy of avoiding land at risk of flooding.
- 3.5 The Green Belt site at Land North of Colliter's Way is located on the Bristol (Bishopsworth) side of the distributor road on the edge of Bristol, has limited impact on Green Belt purposes, is bounded by a clear and permanent physical feature (Colliter's Way) and is proposed to be developed comprehensively with a site at Elsbert Drive proposed in the Bristol Local Plan. This site is therefore proposed to be retained as an allocation in the Reg 19 plan.
- 3.6 The extent of the existing adopted Green Belt within North Somerset is 15,531 hectares. The Reg 19 plan proposes several amendments.
- 3.7 As part of the Green Belt review work, a 155 hectare extension of the Green Belt was proposed between the south of Nailsea and north of Backwell. The justification for the extent of the area identified and how the tests within NPPF paragraph 139 were met was set out in the [Green Belt Review Part 3](#) (January 2022). The extension of the Green Belt designation is retained in the Reg 19 plan.
- 3.8 Minor amendments around the Portishead settlement boundary have resulted in an additional four hectares of Green Belt. The previous settlement boundary around the Ashlands development was indicative only, as it was drawn on the basis of the indicative masterplan. Now that the developments are complete, the settlement boundary has been redrawn to follow the built form, and the Green Belt edge extended slightly to abut the settlement boundary.
- 3.9 Removal of the Colliter's Way site referred to above from the Green Belt reduces the extent by 12 hectares. The enlargement of the Bristol Airport inset results in a further reduction of 161 hectares of Green Belt.
- 3.10 The creation of new village insets and amendments to existing insets at Long Ashton and Easton-in-Gordano/Pill comprise a total reduction of 273 hectares.

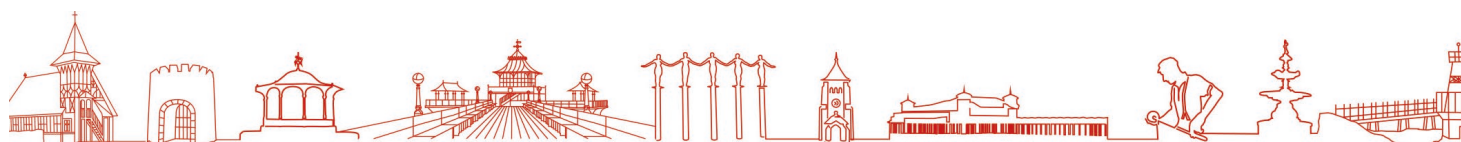




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3.11 Overall, the extent of the Green Belt within North Somerset will be reduced to 15,244 hectares, a net loss of 287 hectares. The Green Belt changes are summarised as follows:

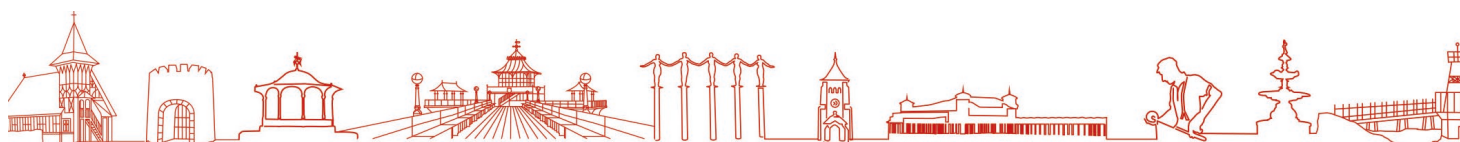
<b>Proposed amendment to Green Belt</b>	<b>Net change (ha)</b>
Bristol Airport inset	-161
Land north of Colliters Way	-12
Abbots Leigh inset	-28
Clapton-in-Gordano inset	-8
Cleeve inset	-20
Dundry inset	-15
Failand inset	-27
Flax Bourton inset	-27
Felton inset	-20
Leigh Woods inset	-24
Portbury inset	-15
Redhill inset	-7
Tickenham inset	-25
Weston-in-Gordano inset	-11
Winford inset	-26
Long Ashton inset amendments	-4
Easton-in-Gordano/Pill inset amendments	-16
<b>Total losses</b>	<b>-446</b>
Proposed extension at Nailsea/Backwell	+155



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<b>Proposed amendment to Green Belt</b>	<b>Net change (ha)</b>
Minor amendments around Portishead settlement boundary	+4
<b>Total gains</b>	<b>+159</b>
<b>Net change</b>	<b>-287</b>

- 3.12 The Preferred Options proposed Nailsea/Backwell as a strategic growth location subject to, in particular, deliverable strategic transport mitigations being identified. This related to a potential new road crossing of the railway to alleviate capacity issues at Backwell crossroads and Station Road. The transport evidence at the time indicated that the rail crossing could be either to the west or east of Backwell and could be a bridge or a tunnel. None of these options are straightforward given flooding issues which could affect any crossing under the railway and the visual impact of a bridge crossing a railway on an embankment. Further technical assessment following Preferred Options resulted in the preference being for a bridge crossing to the east of Backwell. However, taking account of potential development contributions and other sources of funding, the costs of delivery were prohibitive which meant that delivery was highly unlikely over the plan period.
- 3.13 Without the transport infrastructure to unlock large scale development, the focus shifted to what scale of development could be accommodated on the existing network. Without a bridge crossing the exceptional circumstances related to deleting Land East of Backwell from the Green Belt to support the delivery of the transport improvements no longer applied. Land at Grove Farm, Backwell (515 dwellings) is retained as an allocation as access to the A370 does not require a rail crossing but land South of Nailsea (400 dwellings) was deleted given the severe impact development in this location would cause on the local road network.
- 3.14 The conclusions relating to the transport and Green Belt implications of growth at Nailsea/Backwell meant that the proposed scale of development in the area was significantly scaled back, and this is no longer proposed as a strategic growth location in the plan.
- 3.15 Land north of Banwell (Wolvershill) was identified to meet the needs of the principal settlement of Weston-super-Mare and is retained in the Reg 19 plan as the only remaining strategic growth location within North Somerset.



## 4. Approach to villages and rural areas

- 4.1 The [Rural Settlements Paper \(March 2022\)](#) set out the methodology for identifying which settlements were most appropriate for accommodating an appropriate scale of growth consistent with the spatial strategy and sequential approach. The approach used comprised three stages.

### Stage 1: Assess the sustainability of settlements.

- 4.2 The initial assessment of villages considered existing services and facilities within settlements, how accessible they are within the settlement, and whether villages are close to higher order settlements such as towns or larger villages where services and facilities can be accessed relatively easily through active travel or good quality public transport. Villages were categorised into four groups A, B, C and D based on their role and function and relative sustainability. At this stage the methodology did not take account of potential constraints which might restrict development in a particular settlement.

### Category A

These are villages considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and good public transport links to towns.

Backwell, Banwell, Churchill, Congresbury, Easton-in-Gordano/Pill, Long Ashton, Winscombe and Yatton.

### Category B

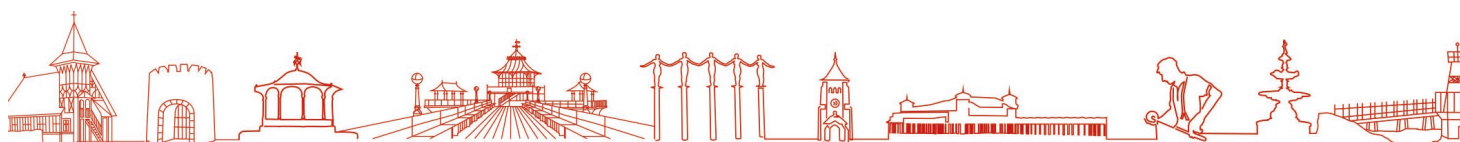
These are villages considered to be relatively sustainable by virtue of their proximity to a higher order settlement. These have some services and facilities and are closely related to a much higher order settlement which has a wide range of services and facilities.

Bleadon, Claverham, Cleeve, Flax Bourton, Hutton, Kenn, Kewstoke, Locking, Portbury, Sandford, Uphill and Wrington.

### Category C

These are villages with limited services and facilities such as just a primary school, village shop or pub and lack good access to higher order settlements by walking, cycling or frequent public transport.

Abbots Leigh, Blagdon, Clapton-in-Gordano, Dundry, Failand, Felton, Leigh Woods, Tickenham, Redhill, Weston-in-Gordano and Winford.



### Category D

These are settlements with few or no services and facilities and poor access to higher order settlements. Many lack reasonable public transport access to other centres and have limited opportunities for active travel.

Barrow Gurney, Burrington, Butcombe, Christon, Loxton, Puxton, Regil, Walton-in-Gordano, Wick St Lawrence, Wraxall and Kingston Seymour.

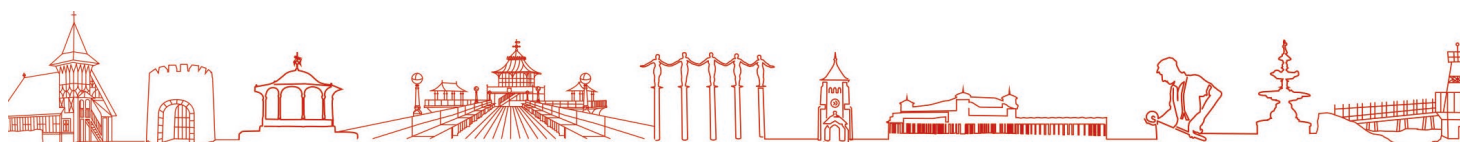
### Stage 2: Selection of the most sustainable settlements.

- 4.3 The approach then considered which of these were most suitable for small scale allocations. Although the villages in categories A and B were considered to be the relatively most sustainable, not all of these villages are appropriate for growth when constraints such as flood risk and Green Belt are taken into account. Originally this assessment excluded consideration of the larger villages of Yatton and Backwell as they were assessed separately through the sequential approach (described as 'other sustainable settlements'), but they are now considered alongside other villages as part of the 'rural areas'. Hutton, Locking and Uphill remain assessed as part of the wider Weston-super-Mare area.
- 4.4 Stage 2 identifies the following nine villages as having potential for small scale site allocations:

Backwell, Banwell, Bleadon, Churchill, Congresbury, Sandford, Winscombe, Wrington and Yatton.

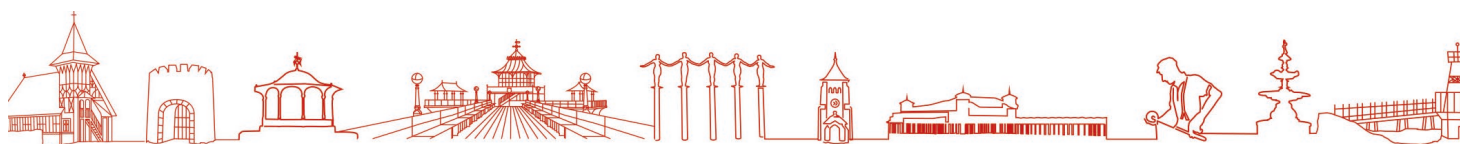
### Stage 3: Settlement assessments and identification of potential allocations

- 4.5 The March 2022 Rural Settlements Paper (March 2022) identified an area of search for each of the settlements assessed at stage 2 using the SHLAA work as the guide to enable all reasonable development opportunities to be considered. The approach then identified primary and secondary constraints and assessed the specific development opportunities. This led to the identification of sites with potential to take forward through the local plan process.
- 4.6 The Site Selection Methodology paper explains how broad location templates for the villages were reviewed and updated for the Pre-submission document. This exercise produced an updated list of potential allocations, now including Backwell and Yatton. The outputs from this work informed the spatial strategy sequential approach in respect of step 4 (rural areas).



## 5. Approach to employment land

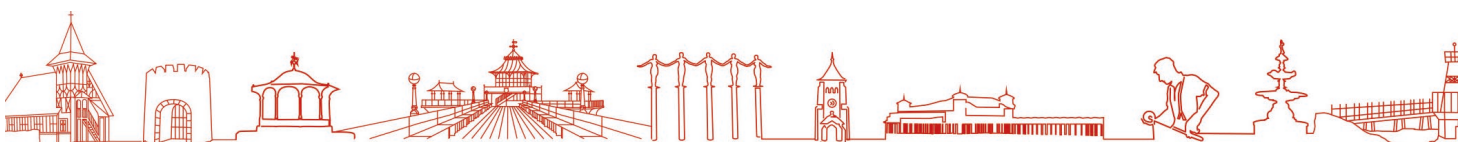
- 5.1 The provision of employment land within the Pre-submission Local Plan has responded to the latest evidence on employment land requirements as published in the North Somerset Employment Sites and Premises Evidence (HJA, October 2023). This evidence identified a scale of employment land for office, industrial and warehousing uses for the period 2023 to 2043 and from this an estimation of the needs for the North Somerset Local Plan period can be identified of around 50ha.
- 5.2 In terms of the supply of sites to meet this need, the identification of sites is guided by the preferred spatial strategy that looks to focus development within or close to the main towns. This requirement is relevant to business uses as well as residential as the commercial attractiveness of business land is dependent upon proximity to labour supply, good public transport choices, and other services and facilities. Therefore, sites identified within the Pre-submission Local Plan are all within or in close proximity to the main towns including Weston-super-Mare, Clevedon, and Portishead.
- 5.3 The evidence on land requirements reiterated messages from previous employment land studies on the opportunity to accommodate demand associated with the M5 corridor, particularly with regard to logistics, distribution, and warehousing type uses. In addition, feedback from the business community coupled with the sites being promoted for commercial development to the local plan emphasised a current lack of business space, particularly in the north of North Somerset. Accordingly, the Pre-submission Local Plan proposed a new 25ha business site to the east of Junction 20 to meet logistics, distribution and warehousing needs. This development is not anticipated to be delivered early in the plan period but instead is considered to offer a longer-term opportunity. This timescale reflects the need to resolve any associated transport issues in discussion with National Highways.
- 5.4 The majority of the proposed employment sites are existing allocations within the Site Allocations Plan (2018) and many are subject to active and ongoing interest. These have been subject to independent review through an Employment Land Review in 2018 that has informed the decision to carry them forward into the Pre-submission Local Plan.
- 5.5 Overall, the package of business sites is considered to provide a range of high quality, and commercially attractive business sites able to meet the needs arising over the plan period. Around 81ha is provided in total which exceeds the scale of employment land indicated to be required through the latest evidence of need. However, the uncertainties regarding the take-up of employment land need to be recognised such as sites being built out at lower densities or lower density employment



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development occupying a greater percentage of overall business land. It is therefore considered necessary to provide an additional supply of sites reflecting the NPPF requirement (see NPPF 2023: paragraph 82) to ensure planning policies have sufficient flexibility to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.

- 5.6 In addition, this approach recognises the uncertainty around the level of re-use of previously developed employment areas to accommodate regeneration/new development as explored through the evidence. If redevelopment is slower than anticipated, a higher proportion of opportunities on new sites may be required.
- 5.7 There is also anecdotal evidence that employment land demand is typically stronger than previous economic forecasts have indicated and therefore, taking all of this into account, the Pre-submission Local Plan makes additional provision for employment land to ensure a range of site opportunities.

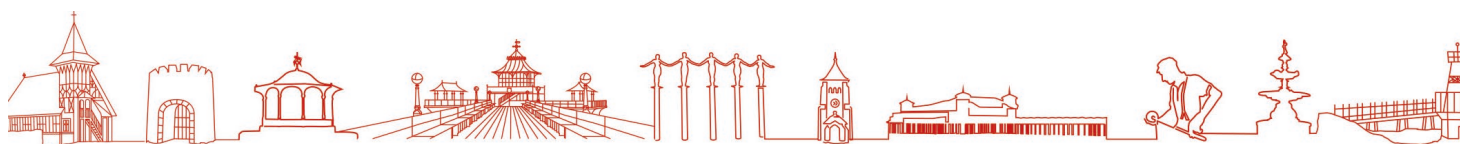


## 6. Sustainability appraisal and the sequential approach

- 6.1 The local plan must demonstrate the delivery of sustainable development. This is informed by the preparation of a sustainability appraisal alongside the plan preparation process to ensure that the plan addresses relevant economic, social and environmental objectives. In order to guide the consideration of the implications of the proposed changes from Preferred Options, an assessment of the potential alternative spatial options was prepared by LUC. This was used to inform the approach set out in the Pre-submission plan.
- 6.2 Commencing with a baseline of existing sites which were constant across the scenarios, the SA considered a range of seven alternative spatial options and how each performed in relation to the sustainability appraisal objectives. While each option contained a mix of effects, Option 1 which related to focussing development next to towns, but outside flood risk areas and Green Belt, was highlighted in that it seemed to achieve a balance between the benefits of delivering development at the towns and therefore offering good access to jobs, services and transport links, and the benefit of achieving a wider spread of development than was seen in some of the other options. This provided reassurance that the plan's spatial strategy and sequential approach remained robust.
- 6.3 The spatial strategy had been developed following consideration of the response to consultation on the Challenges for the future and Choices for the future:

*'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.'*

- 6.4 This spatial strategy remains fit for purpose as the basis for considering post-Preferred Options changes. It does not reference Green Belt and so can accommodate different approaches to the weight accorded to Green Belt objectives. In order to provide a framework to identify and assess potential broad locations for growth, the following sequential approach was used:



Step 1: Existing planning permissions.
Step 2: Urban capacity.
Step 3: Town expansion.
Step 4: Rural areas.
Step 5: Other opportunities.
Step 6: Green Belt.

6.5 The Pre-submission plan is based on the same spatial strategy as Preferred Options but the methodology in relation to the sequential approach has been adjusted. There is no longer a distinction made between ‘other sustainable settlements’ and ‘rural areas’ in the hierarchy of steps. All villages, including Yatton and Backwell, are assessed at the same stage where opportunities and constraints can be identified. This means that there are now nine villages identified as being appropriate for further investigation. These have been reviewed through the broad locations work summarised in the Site Selection Methodology paper.

The following summarises the conclusions in relation to the identification of sites using the sequential approach.

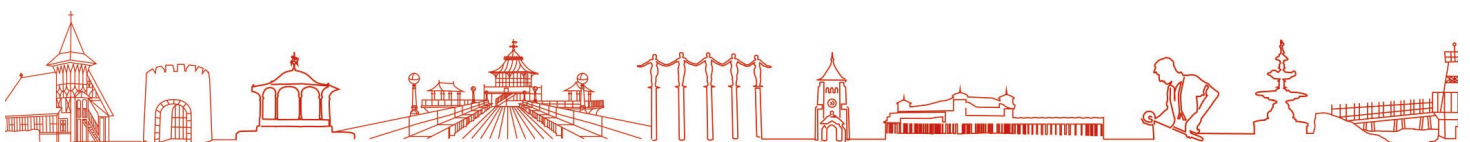
**Step 1: Existing planning permissions**

6.6 Of the 15,734 units of capacity identified in the plan in total, 6,656 already have planning consent or a resolution to grant permission.

A significant proportion of the capacity within this category is the residual existing commitment of 4,250 dwellings that are yet to be built out at the Weston Villages.

The existing commitments are split by area as follows:

Area	Capacity from existing commitments
Weston-super-Mare	4,809
Clevedon	58





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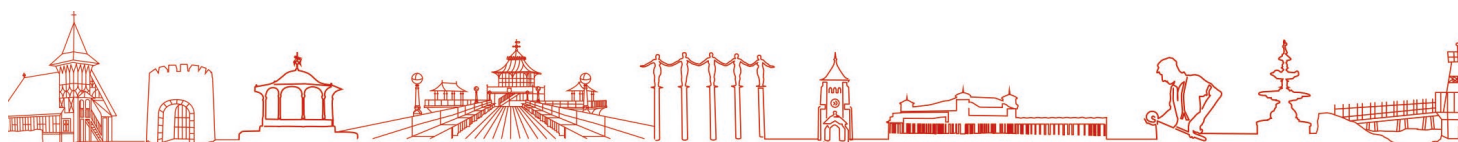
Area	Capacity from existing commitments
Nailsea	598
Portishead	119
Rural areas	1,072
<b>Total</b>	<b>6,656</b>

### Step 2: Urban capacity

- 6.7 Maximising the use of previously developed and under-used land within the towns supports the delivery of sustainable development through the re-use of existing resources and also to ensure that development is close to a wide range of services, facilities, jobs and public transport. While the greatest potential is likely to come from Weston, there are specific opportunities elsewhere, such as the Wyndham Way broad location in Portishead. The Site Selection Methodology paper explains the approach and identifies the following capacity at each town, beyond the existing commitments identified at step 1 above.

Area	Urban capacity
Weston-super-Mare	1,434
Clevedon	234
Nailsea	28
Portishead	373
<b>Total</b>	<b>2,069</b>

### Step 3: Town expansion



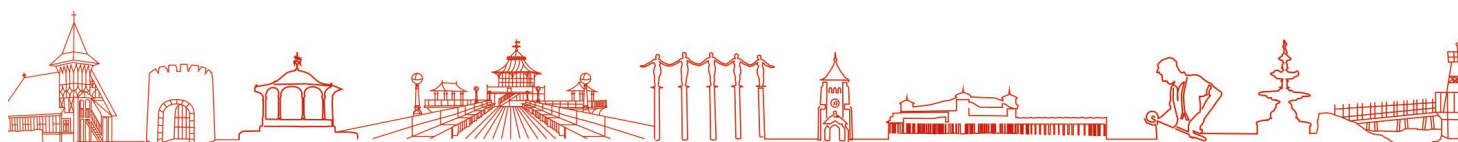
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- 6.8 The next priority in the sequential approach was to assess the potential opportunities for new development well-related to the four towns, but outside the Green Belt.
- 6.9 For Weston-super-Mare the broad location area was drawn to include those villages close to Weston. This step therefore includes potential opportunities at Uphill, Locking and Hutton.
- 6.10 Preferred Options included a new strategic growth location at Wolvershill (north of Banwell) which is well related to the Weston urban area. Further work has confirmed the deliverability of this site and it is retained as an allocation in the Pre-submission plan for mixed use development, including 2,800 dwellings.
- 6.11 An extension of the settlement boundary is proposed at North West Nailsea to accommodate a modest development. No extensions are proposed to Clevedon and Portishead given the surrounding Green Belt and areas at risk of flooding.

Area	Town expansion
Weston-super-Mare (inc wider Weston)	55
Wolvershill strategic site	2,800
Nailsea	75
Total	2,930

### Step 4: Rural areas

- 6.12 At Preferred Options, Yatton and Backwell had been highlighted as 'other sustainable settlements' given their size, good range of services and facilities and public transport accessibility. However, Yatton is tightly constrained by flood risk areas and the response to the consultation on Preferred Options questioned the approach to Backwell which had been assessed as a potential growth point with Nailsea. There was a strong community view that Backwell was a village and therefore the scale of growth proposed was inappropriate. The subsequent conclusions in relation to the deliverability of transport infrastructure and the scaling back of the proposed allocations meant that the role of Backwell was reviewed.



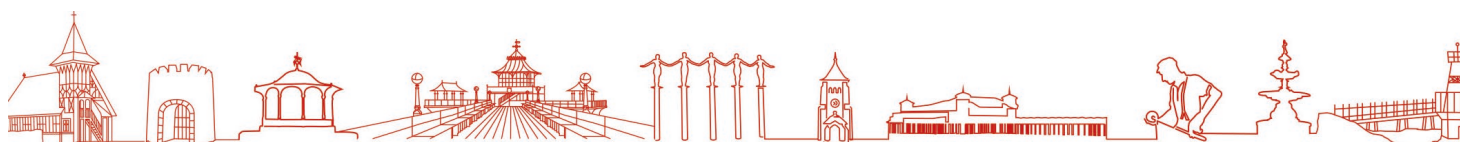
6.13 Nine villages were identified as being relatively more sustainable and investigated in more detail as broad locations for potential development. This resulted in the identification of 993 dwellings on sites in the rural areas. Note that this step does not include the existing commitment sites already accounted for at step 1.

Area	Rural area allocations
Backwell	515
Banwell	0
Bleadon	0
Churchill	191
Congresbury	80
Sandford	35
Winscombe	172
Wroughton	0
Yatton	0
Total	993

### Step 5: Other opportunities

6.14 Before considering the Green Belt, it is important to demonstrate that all reasonable options for meeting the identified need have been examined. This step ensures that any other non-Green Belt options have been identified. The Spatial Strategy and Capacity paper February 2022 highlighted options related to use of land at risk of flooding with appropriate mitigation, or the creation of new settlements.

6.15 There are proposals for development in flood risk areas and some are adjacent to the towns. However, given concerns about future climate



change and government advice that development should not be allocated if there are reasonably sites available in areas with a lower risk of flooding, the approach as set out in the spatial strategy is to avoid flood risk areas outside the towns.

- 6.16 There are not currently any new settlement proposals being promoted and locations such as Mendip Spring are effectively village expansions in relatively unsustainable locations.
- 6.17 No additional capacity has been identified for step 5.

### **Green Belt**

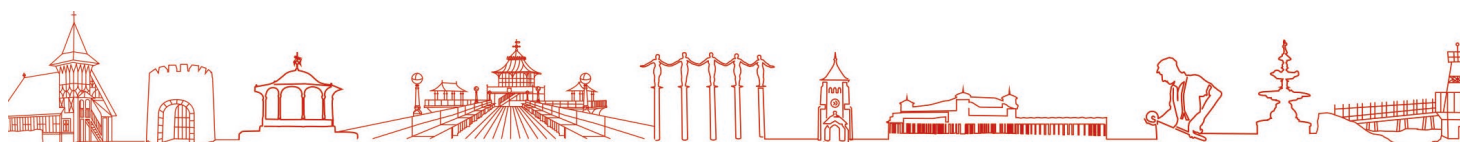
- 6.18 Preferred Options identified four proposed locations to be deleted from the Green Belt to help address the standard method housing target. These have been reviewed in the light of government advice regarding the importance of protecting Green Belt when considering how to address housing needs. Only one site, Land north of Colliter's Way, is proposed to be retained and with an indicative capacity of 215 dwellings.

### **Windfall**

- 6.19 The plan must include an up to date and robust assessment of the amount of windfall sites that can reasonably be expected to come forward during the plan period within North Somerset. The National Planning Policy Framework (NPPF) defines windfall sites as 'sites not specifically identified in the development plan'. NPPF paragraph 69 recognises the importance of small sites as a valuable component of housing supply and paragraph 71 clearly permits the inclusion of a windfall allowance within anticipated plan period supply where it can be demonstrated that it is reasonable to do so.

*'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'*

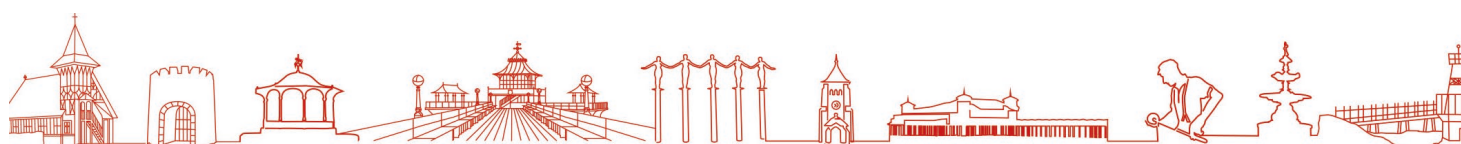
- 6.20 The Strategic Housing Land Availability Assessment (SHLAA) assessed the potential of all known large site opportunities and identified those which have potential to deliver housing. On that basis no allowance is proposed to be included in windfall provision from large sites, as those deemed to have potential and considered to accord with the spatial



strategy are identified for allocation in the plan. To also include a large site windfall allowance would risk double counting of potential supply.

- 6.21 The SHLAA also sets out historic small site windfall completions data. This evidence shows that within the past five years 957 dwellings have come forward from small sites, an average of 191 each year.
- 6.22 The starting point for calculating an expected future trend is to assess previous delivery. Within the past five years there have been challenging market conditions and the impacts of the coronavirus pandemic. These factors allow confidence that the figures do not reflect a time period that was particularly buoyant. This provides reassurance that it is reasonable to expect at least this level of small site windfall to continue in the future.
- 6.23 As set out in the SHLAA, the geographical spread of windfall completions within the past five years shows Weston-super-Mare as the focus for development, followed by the other three towns, then the relatively more sustainable villages, then the smaller settlements and rural areas.
- 6.24 The Local Plan follows broadly the same spatial strategy, prioritising growth in or close to urban areas whilst permitting development at villages and in the countryside which relates to community needs. Settlement boundaries have been reviewed and flexed allowing appropriate additional opportunities for growth. In addition, some settlements that were previously washed over by Green Belt have had settlement boundaries identified and inset from the Green Belt, which will allow development that may have been considered inappropriate previously. Taken together, these factors provide reassurance that small site windfall completions will continue to come forward at least at the rates previously achieved.
- 6.25 Therefore, the Local Plan makes provision for and expected 2,871 dwellings from small windfall over the 15 year period. On the basis of the geographical spread of completions in recent years this is attributed to the high-level areas as follows:

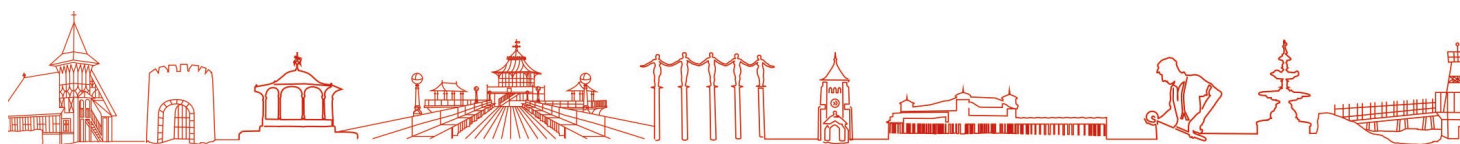
Area	Windfall allowance
Clevedon	270
Nailsea	225
Portishead	243
Weston-super-Mare	858
Rest of district	1275
<b>Total</b>	<b>2871</b>



## Overall summary of capacity

6.26 The following tables summarises the identified capacity in relation to the sequential approach.

Sequential step	Capacity
1. Existing permissions	6,656
2. Urban intensification	2,069
3. Town expansion	2,930
4. Rural areas	993
5. Other opportunities	0
6. Green Belt	215
Windfall allowance	2,871
Total	15,734

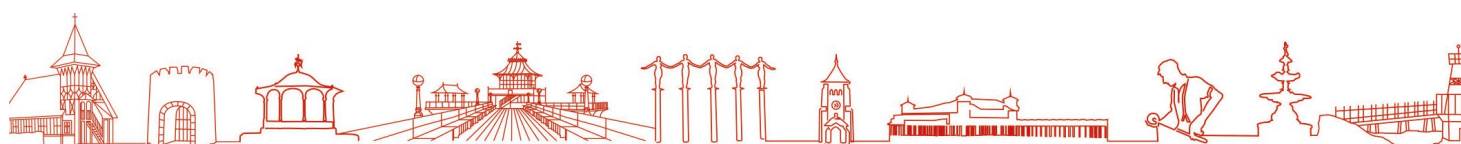


## 7. Overall approach

7.1 The overall distribution of growth as proposed in the Pre-submission plan is anticipated to be as follows. These figures include windfall, indicatively split by area on the basis of parish level completions within the past five years.

Area	Step 1: Existing commitments	Step 2: Urban capacity	Step 3: Town expansion	Step 4: Rural areas	Step 5: Other	Step 6: Green Belt	Windfall	Total	%
Weston-super-Mare	4,809	1,434	55	0	0	0	858	7,156	45.5%
Wolvershill	0	0	2,800	0	0	0	0	2,800	17.8%
Clevedon	58	234	0	0	0	0	270	562	3.6%
Nailsea	598	28	75	0	0	0	225	926	5.9%
Portishead	119	373	0	0	0	0	243	735	4.7%
Backwell	190	0	0	515	0	0	78	783	5.0%
Banwell	101	0	0	0	0	0	93	194	1.2%
Bleadon	56	0	0	0	0	0	36	92	0.6%
Churchill	93	0	0	191	0	0	87	371	2.4%
Congresbury	88	0	0	80	0	0	114	282	1.8%
Sandford	49	0	0	35	0	0	36	120	0.8%
Winscombe	97	0	0	172	0	0	72	341	2.2%
Wrington	0	0	0	0	0	0	51	51	0.3%
Yatton	207	0	0	0	0	0	90	297	1.9%
Other areas	191	0	0	0	0	215	618	1,024	6.5%
<b>Total</b>	<b>6,656</b>	<b>2,069</b>	<b>2,930</b>	<b>993</b>	<b>0</b>	<b>215</b>	<b>2,871</b>	<b>15,734</b>	<b>100.0%</b>

7.2 The anticipated capacity of 15,734 dwellings, including windfall is sufficient to deliver the housing need figure of 14,902 dwellings over the plan period.



## 8. Conclusion

- 8.1 The spatial strategy which evolved from the early stages of consultation on the Challenges for the future and Choices for the future, and was confirmed in the Preferred Options, remains fit for purpose. Similarly, the sequential approach continues to provide a logical and consistent framework for site assessment. This process, together with sustainability appraisal, helps to ensure that the package of sites identified to meet the housing requirement delivers sustainable development consistent with the plan's strategic objectives.
- 8.2 There have been some significant amendments to the plan between Preferred Options and the Pre-submission plan primarily in relation to the reduced housing requirement and the approach to Green Belt which reflect national changes. This has had implications for the quantum of growth and sites proposed.
- 8.3 While the overall housing requirement has been reduced, this remains a challenging target. However, the reassessment of overall capacity, including windfall, indicates that there is sufficient supply to meet local needs over the plan period and to deliver sustainable development.
- 8.4 A package of employment allocations at sustainable locations has been proposed that exceeds the evidence based requirement, to ensure that economic growth targets are met.

