

**Land north of Mulberry Road,  
Congresbury**

**Housing Land Supply  
Statement of Common Ground**

M7 Planning Limited & M7 SW LLP

15 August 2024

**LICHFIELDS**

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## 1.0 Introduction

1.1 The Housing Land Supply Statement of Common Ground (HLS SOCG) has been prepared in accordance with the Town and Country Planning (Inquiries Procedure) (England) Rules 2000 as amended by the Town and Country Planning (Hearings and Inquiries Procedures) (England) (amendment) Rules 2009 (2009 SI 445) and guidance set out in PINS: Procedural Guidance: Planning Appeals – England (May 2024). It follows the format set out in the Procedural Guidance.

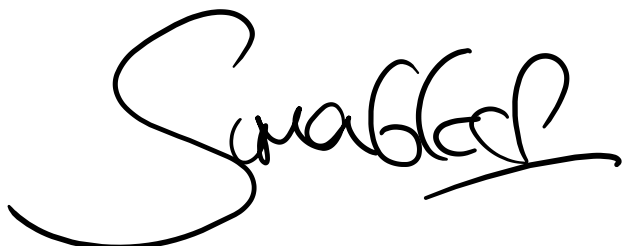
1.2 It has been prepared in respect of appeal against the refusal of outline planning permission by North Somerset Council (NSC) for the proposed development of up to 70 dwellings at Land North of Mulberry Road, Congresbury (LPA Reference: 22/P/0459/OUT).

1.3 The HLS SOCG should be read together with the main SOCG. Preliminary information set out in the main SOCG is not repeated in this separate statement.

## Scope of the Document

1.4 This statement is prepared jointly on behalf of the Appellant (M7 Planning Limited and M7 SW LLP) and NSC. Its purpose is to set out agreed key factual background information in relation to housing land supply to assist the Inspector and to avoid duplication.

Signed



(Lichfields, on behalf of M7 Planning Limited and M7 SW LLP)



(North Somerset Council)

## 2.0 Policy matters

- 2.1 The planning application to which this appeal relates was submitted to NSC on 22 February 2023. Planning permission was refused on 21 November 2023.
- 2.2 It is agreed that this appeal will be considered in the context of the relevant version of the NPPF that is in force at the time that the Inspector makes his decision. This is currently the version dated December 2023.
- 2.3 Having regard to paragraphs 76 and 77 of the December 2023 NPPF it is agreed that:
- 1 The statutory development plan for the site<sup>1</sup> is more than five years old and so North Somerset Council cannot apply the exception set out in paragraph 76. It must therefore continue to demonstrate an ongoing housing land supply.
  - 2 North Somerset Council published its Regulation 19 Local Plan for consultation in November 2023. This included a policies map and housing allocations. As such, North Somerset Council is only required to demonstrate a four-year housing land supply.
  - 3 In identifying its housing requirement, North Somerset Council is no longer required to apply a 5% buffer.
  - 4 The 2022 Housing Delivery Test measurement, which was published in December 2023, indicated that housing delivery in North Somerset over the past three years (2019/20 to 2021/22) (2,851 dwellings) equated to 90% of the identified requirement (3,167 dwellings). As such, North Somerset Council is not required to apply a 20% buffer to its housing requirement for the purposes of assessing the housing land supply.
- 2.4 It is agreed that in order to contribute towards the identified housing land supply, any sites must accord with the NPPF Glossary definition of “deliverable”.

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<sup>1</sup> Comprising the North Somerset Core Strategy (adopted 2017), North Somerset Development Management Policies (Sites and Policies Part 1, adopted 2016), Site Allocations Plan (Sites and Policies Part 2, adopted 10 April 2018) and the Congresbury Neighbourhood Development Plan (made 2019)

### 3.0 **Past housing land supply position**

- 3.1 Paragraph 77 of the NPPF states that local planning authorities that have an adopted local plan that is more than five years old are required to “*identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years’ worth of housing, or a minimum of four years’ worth of housing if the provisions in paragraph 226 apply.*” The PPG states that the housing land supply position should be detailed in an annual position statement.
- 3.2 North Somerset Council’s latest land supply position statement has a base date of April 2024 and was published in August 2024. This claimed that the Council had a 3.88-year housing land supply.
- 3.3 It is agreed that the 2021 Housing Delivery Test result for North Somerset (between 2018/19 to 2020/21) was 89% and that the 2022 Housing Delivery Test result (between 2019/20 and 2021/22) was 90%.
- 3.4 It is agreed that both results necessitate preparation and publication of an Action Plan in accordance with the requirements of the PPG. NSC published an Action Plan in pursuance of the Housing Delivery Test results in:
- 1 August 2019 (relating to the 2018 Measurement, published in February 2019);
  - 2 August 2020 (relating to the 2019 Measurement, published in February 2020);
  - 3 July 2021 (relating to the 2020 Measurement, published in January 2021); and,
  - 4 July 2022 (relating to the 2021 Measurement, published in January 2022).
- 3.5 It has not yet published an Action Plan in pursuance of the 2022 Housing Delivery Test results which were published in December 2023.

## 4.0 **Housing requirements**

4.1 It is agreed that the PPG (Reference ID: 68-055-20240205) has been updated to clarify that:

*“Both the 5 year housing land supply and the 4 year housing land supply that authorities should demonstrate for decision making should consist of deliverable housing sites demonstrated against the authority’s five year housing land supply requirement, including the appropriate buffer.”*

4.2 It is agreed that the applicable housing requirement should be based on the Standard Methodology for calculating Local Housing Need, as follows:

- 1 The 2014-Sub National Household Projections for the period 2024 to 2034 (962 per annum); and,
- 2 The most recently published affordability data<sup>2</sup> which record the ratio of median house prices to median workplaces incomes in North Somerset in 2023 as being 10.01 and generates an affordability uplift of 37.56%<sup>3</sup>.

4.3 The result of this is a housing need of 1,324 per annum.

4.4 As the housing requirement is based on the standard method figure rather than the Local Plan requirement, it is agreed that there is no need to account for the potential backlog of delivery in assessing the housing need for North Somerset.

4.5 For the purposes of this assessment, it is agreed that the current housing land supply position in North Somerset will therefore be tested against a requirement for 6,620 dwellings (i.e. 1,324 x 5 years).

### **Draft NPPF consultation and proposed revisions to standard methodology**

4.6 The draft revisions to the NPPF and standard methodology were published on 30 July 2024 and are currently subject to consultation until 24 September 2024. In respect of housing land supply, the proposed revisions:

- 1 Could increase the standard methodology figure for North Somerset to 1,587dpa;
- 2 Could remove the requirement to apply a four-year supply where a plan has reached Regulation 18 state; and,
- 3 Could reinstate the requirement to apply a 5% buffer.

4.7 It is agreed that, if there are no changes to the proposals following the consultation, the implication of the proposed changes to the NPPF and standard methodology would be to increase the five-year housing requirement to 8,332 dwellings.

4.8 It is not currently known when the revised NPPF and standard methodology will be introduced, or whether the consultation proposals will be amended prior to publication

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<sup>2</sup> Released 25 March 2024. Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

<sup>3</sup> Based on the formula set out in the PPG – Reference ID 2a-004-20201216:  $(\frac{10.1-4}{4}) \times 0.25 + 1$

## 5.0 Housing supply

### Matters that are agreed

- 5.1 It is agreed that North Somerset Council is unable to demonstrate the requisite four-year housing land supply.
- 5.2 In the light of the NPPF definition of “deliverable”, it is agreed that 1,278 dwellings are likely to be delivered on 31 sites that currently benefit from detailed planning permission.
- 5.3 It is also agreed that the following sites will deliver the identified number of dwellings over the next five years:

Table 5.1 Summary of agreed sites

Site	Agreed number of dwellings to be delivered between 2024 and 2029
Land adjacent to Woodside Avenue, Weston-Super-Mare	16
Land at Rectory Farm, Yatton	98
Land west of Rodney Road, Backwell	60
Land south of Greenhill Lane, Sandford	49
Weston Villages - Locking Parklands	555
Weston Villages - Land south of Churchland Way	465
Weston Villages - Parklands, south of Locking Head Drive	300
Weston Villages - Parklands, Moss Land	69
Weston Villages - Parklands, Mead Fields, south of Wolverhill Road	2
Land adjoining Coombe Farm, Winscombe	68
<b>Total</b>	<b>1682</b>

### Matters that are not agreed

- 5.4 The Council and the appellant do not agree about the expected delivery of the following sites:

Table 5.2 Summary of sites that are not agreed

	NSC position	Appellant position	Difference
Land at Weston Rugby Club, Weston-Super-Mare	182	0	-182
Mead Vale Shopping Centre, Weston-Super-Mare	29	0	-29
Land off Anson Road, Kewstoke	70	0	-70
Land at Farleigh Farm, Backwell	6	0	-6
Weston Villages - Winterstoke, Haywood Village	800	620	-180
Millcross site, Clevedon	50	0	-50
North West Nailsea	150	0	-150

Former Bournville School site, Selworthy Road, Weston-super-Mare	28	0	-28
<b>Total</b>	<b>1,315</b>	<b>620</b>	<b>-695</b>

5.5 The position in respect of small windfall sites is also not agreed.

5.6 Drawing on the assessment set out above, the respective positions of North Somerset Council and the appellant are summarised below:

Table 5.3 Summary of sources of five-year housing land supply

	Estimated delivery within 5 years		
	NSC	Appellant	Difference
Sites with detailed planning permission	1,278	1,278	0
Sites with outline planning permission	510	223	-287
Strategic sites with planning permission	2,191	2,011	-180
Site with resolution to grant planning permission	68	68	0
Allocated sites without planning permission	228	0	-228
Small sites	865	489	-30
Windfalls		346	
<b>Total</b>	<b>5,140</b>	<b>4,415</b>	<b>-725</b>

5.7 Whilst it is agreed that North Somerset Council is unable to demonstrate the requisite four-year housing land supply, the scale of the shortfall is not agreed. The different positions are detailed in Table 5.4:

Table 5.4 Summary of current housing land supply position

	NSC	Appellant
Requirement	6,620	
Identified supply	5,140	4,415
Shortfall	-1,480	-2,230
Supply position	3.88 years	3.33 years