

**Comment ID**

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**Document Section**

- ▶ North Somerset Local Plan 2039: Pre-s... ▶ 3. Strategic Policies
- ▶ SP1: Sustainable development ▶ SP1: Sustainable Development

**Respondent**

M7 Planning Ltd and M7 SW LLP

**Agent**

Arwel Evans - Lichfields

**Response Date**

21 Jan 2024

**Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? The requirement for a plan to be sound can be found in the National Planning Policy Framework paragraph 35.**

No

**If you selected 'no', do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be unsound because it is not:**

Positively prepared

Justified

Consistent with national policy

**Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?**

No

**Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?**

No

**If you consider the North Somerset Local Plan 2039: Pre-submission Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate then please provide details. Please be as precise as possible.**

National Planning Policy Framework was updated in December 2023. However, paragraph 230 of Annex 1 advises that where draft emerging plans reach pre-submission consultation (Reg 19) on or prior to 19 March 2024, which is the case in this instance, the emerging draft plan is to be examined under the relevant previous version of NPPF (September 2023).

Paragraph 11b of the NPPF requires strategic policies as a minimum to provide for objectively assessed needs for housing as well as any needs that cannot be met within neighbouring areas, unless footnote 7 policies in NPPF provide a strong reason for restricting the scale of growth; or any adverse impacts of meeting housing needs would significantly and demonstrably outweigh the benefits.

Paragraph 35 of NPPF establishes that in order to be 'Positively Prepared', the Plan strategy must seek to meet, as a minimum, the areas objectively assessed needs as well as unmet need from neighbouring areas.

Paragraph 61 of NPPF requires that the minimum number of homes needed should be informed by a local housing needs assessment conducted using the standard method unless "exceptional circumstances" justify an alternative approach which also reflects demographic trends and market signals.

The standard method currently identifies a minimum need for 1,326 homes per annum in North Somerset (January 2024). This equates to a minimum need for 19,890 homes over the proposed plan period (2024-39). The Council considers that its housing requirement is 14,902 over the plan period informed by an alternative 'analysis'.

The emerging Local Plan nor the evidence base that supports it sets out any evidence seeking to demonstrate exceptional circumstances that would justify a departure from using standard method, as a minimum, to inform the objectively assessed need as a minimum.

The representations prepared by Neil Tiley of Pegasus Group and submitted on behalf of our client under separate cover provides detailed commentary on the Council's proposed housing requirement, including the objective assessment of need. It concludes that Policy SP8 is unsound and sets out a number of required modifications to make the emerging plan sound. These include the identification of a "...significant number of additional sites providing between c.8,781 and 9,281 additional homes to meet even the minimum need for 22,899 homes over the minimum period 2024-41, as well as additional sites to respond to the unmet needs of Bristol City and to support economic growth and meet affordable housing needs."

**Please set out any modifications you consider necessary to make the North Somerset Local Plan 2039: Pre-submission Plan legally compliant and sound in respect of any issues you have identified.**

The housing requirement should be calculated in accordance with the NPPF (as further evidenced in the representations prepared by Neil Tiley of Pegasus Group) and additional

sites should be identified for allocation, including our client's site at Land North of Mulberry Road, Congresbury.

**If you wish to support the soundness or legal compliance of the North Somerset Local Plan 2039: Pre-submission Plan please provide details.**

**If your representation is seeking modification to the North Somerset Local Plan 2039: Pre-submission Plan, do you consider it necessary to participate at the examination hearings?**

Yes, I wish to participate in the examinati...

**If you wish to participate in the examination hearings please outline why you consider this to be necessary.**

To discuss and explore the matters raised in the representations in more detail.

**Attachments**