

Town and Country Planning Act 1990 (As Amended)

**Town and Country Planning (Inquiries Procedure)
(England) Rules 2000 (As Amended)**

Appeal by M7 Planning Limited and M7 SW LLP

**Land north of Mulberry Road, Congresbury, BS49
5HD**

Planning Inspectorate reference: APP/D0121/W/24/3344142

North Somerset Council reference: 22/P/0459/OUT

Housing land supply

Proof of evidence of:

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North Somerset Council



Statement of qualifications and experience

I am the Council's Planning Policy Team Lead – Technical and Infrastructure, within the Planning Policy team.

I have 20 years' experience in local government development management, 18 of which have been in a planning policy research, monitoring and evidence context.

I have worked on evidence to inform and monitor the current adopted development plan documents including the Core Strategy, Sites and Policies Plan Part 1: Development Management Policies, Sites and Policies Plan Part 2: Site Allocations Plan, and the emerging new Local Plan.

I am responsible for land use monitoring, maintaining housing land supply records and production of the Authority's Monitoring Report. I personally visit the sites that comprise the council's land supply position. I attend various stakeholder groups and internal meetings related to supporting and boosting housing delivery. I manage the council's development contributions function, ensuring I am fully up to date with monitoring progress of delivery of housing. I work closely with the Council's Assistant Director of Placemaking and Growth, ensuring I have a detailed knowledge of the council's own delivery programme. I attend strategic development team meetings and work closely with the case officers for major schemes.

The facts stated in this evidence are true to the best of my knowledge and belief, and the views I express represent my professional opinion.

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Introduction

1. This proof of evidence addresses the council's housing land supply position and sets out my professional opinion on housing land supply matters within North Somerset.
2. The scope of this evidence is limited to land supply matters, setting out the current position regarding the housing land requirement, the supply of deliverable sites and the resulting calculations. Mr Reynolds' evidence will deal with any consequences of this position.
3. This proof of evidence is submitted on the basis that it is agreed between the parties that the Council cannot presently demonstrate the requisite supply.

Land supply requirement

Background

4. Paragraph 77 of the National Planning Policy Framework (NPPF) states that:

'...local planning authorities should 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 supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).'

5. Paragraph 226 of the NPPF is part of the transitional arrangements that were set out when national policy was last updated in December 2023. This policy applies in circumstances where an emerging local plan has reached Regulation 19 stage. This is the case in North Somerset. Therefore, the Local Planning Authority are required to demonstrate a minimum of four years' worth of deliverable housing sites.
6. The current adopted housing requirement is 20,985 dwellings for the plan period 2006-2026 as set out in Policy CS13 of the Core Strategy (Core Document A1). This housing requirement was adopted in September 2015, which is more than five years ago. Therefore, the housing land supply position should be assessed against the local housing need figure, which is calculated using the standard methodology prescribed in the National Planning Practice Guidance (NPPG) within the Housing and Economic Needs Assessment section.
7. Paragraph 77 of the framework, along with footnote 43, defines how 'significant under delivery of housing' is measured for the purposes of this policy. Footnote 43 states:
'This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement'.

8. The Housing Delivery Test is a government measure, published annually, which looks at the net amount of homes delivered in each local authority area over the past three years against the number of homes that were required during that period, using national statistics and local authority data. For North Somerset the most recent results, dated 2022 and published in December 2023, are 90%.
9. Therefore, there has not been significant under delivery of housing in terms of the NPPF measure and no buffer is required to be applied in the land supply requirement calculation.
10. The Council's most recently published assessment of supply has a base date of April 2024 and covers the period 1 April 2024 – 31 March 2029. The North Somerset Residential Land Survey and Housing Land Supply Position Report April 2024 is Core Document I20 and the accompanying data tables are Core Document I20a.

Framework for the land supply requirement calculations

11. The current adopted housing requirement for North Somerset is 20,985 dwellings for the period 2006-2026 as per Policy CS13 of the North Somerset Core Strategy (Core Document A1), which equates to 1,049 dwellings per annum.
12. The Core Strategy was originally adopted in April 2012. Following a High Court Challenge, Policy CS13 and eight other policies which could have required consequential changes were remitted by the court back to examination stage in 2013. The rest of the plan remained adopted.
13. The re-examination of the remitted policies took place in two parts, first focusing on Policy CS13 and the housing requirement itself. Hearings were held and the Inspector's report was received in March 2015. In September 2015 the Secretary of State directed adoption of the revised Policy CS13 housing requirement.
14. The re-examination then moved to its second phase, examining the other remitted policies that may have required consequential changes. Following hearings in the summer of 2016 the Inspector published his report in November that year, and the remaining policies were re-adopted in January 2017.
15. As Policy CS13, and therefore the housing requirement, was adopted in September 2015 this is now in excess of five years ago. As explained above, in such circumstances the NPPF directs that the housing land supply position should be assessed against a local housing need figure, calculated using the government's standard methodology as set out in national guidance.
16. There are four steps to follow to undertake the calculation, as explained in the paragraphs below.

Step 1 – Setting the baseline

17. The baseline for the calculation is prescribed in the guidance as the 2014-based household projections in England, for the area of the local authority.

Household projections are trend-based and indicate the number of additional households that would form within an area if recent demographic trends were to continue. They are based upon population projections and driven by assumptions on fertility and mortality rates, net migration and household formation patterns.

18. You must calculate the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period).

19. For North Somerset, the 2014 based household projections are as follows:

101,384 households in 2024

111,008 households in 2034

20. This is a total of 9,624 new households over the 10-year period, equivalent to an average household growth of 962 per year.

Step 2 – An adjustment to take account of affordability

21. You must then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area. Two reasons are given for this uplift:

- household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and
- people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.

22. The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used. The most recent publication is the 2023 dataset.

23. No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4, the average household growth baseline should be increased by a quarter of a percent. An authority with a ratio of 8 will have a 25% increase on its annual average household growth baseline.

24. Where an adjustment is to be made, the precise formula is as follows:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

25. For North Somerset the 2023 median ratio of house prices to annual earnings is 10.01. This is based on the figures for average house price within the district (£320,000) and the average earnings from jobs within the district (£31,963).

26. Using these figures and the prescribed calculation the current adjustment figure for North Somerset is 1.3757.

Step 3 – Capping the level of any increase

27. A cap is then applied which limits the increases an individual local authority can face. Where a housing requirement has adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.

28. This cap does not apply in the case of North Somerset, as the figure arrived at using the standard method does not exceed the limit of 40% greater than the previously adopted target, and the adopted housing requirement is over five years old.

Step 4 – Cities and urban centres uplift

29. A 35% uplift is applied for those urban local authorities in the top 20 cities and urban centres list. This increase in the number of homes to be

delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations. They are advised by the guidance that they should prioritise the use of brownfield sites and maximise densities.

30. This does not apply to North Somerset.

Conclusion on the requirement

31. The output of the standard methodology calculation for North Somerset is therefore currently 1,324 homes per year.

32. No buffer is required to be incorporated as past delivery (measured using the official Housing Delivery Test results) stands at 90%.

33. In order to demonstrate the requisite four-year supply, the Local Planning Authority would need to demonstrate and evidence 5,296 units of deliverable supply.

34. This is agreed between the parties.

Supply of deliverable sites

35. As part of the North Somerset Residential Land Survey and Housing Land Supply Position Report April 2024 a site-specific detailed housing trajectory is included within the data tables (Core Document I20a, deliverable land supply table).
36. This trajectory shows annual anticipated delivery from individual sites that are included within the land supply position.
37. The trajectory, and this proof of evidence, have been compiled in the context of the definition of deliverable set out in glossary of the NPPF at Annex 2. This states:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

38. National guidance offers further interpretation of the phrase 'clear evidence' and gives examples such as progress towards reserved matters and discharge of conditions, or written agreements with developers (NPPG: Housing supply and delivery – Paragraph 007: 68-007-20190722). The examples given are not an exhaustive list, rather they are pre-fixed with the words 'may include'.
39. At the time of producing the trajectory, total deliverable supply anticipated within the next five-year period (April 2024 – March 2029) amounted to 5,140 dwellings.

40. This total anticipated supply at April 2024 is broken down by category as shown in Table 1 below.

Table 1 – Anticipated supply by category	
Category	Amount of deliverable supply at April 2024
Large sites with detailed consent	1,278
Large sites with outline consent	510
Strategic sites with consent	2,191
Sites with a resolution to grant consent	68
Extant allocations	228
Small sites	865
Total deliverable supply	5,140

41. The following sections of this proof deal with each category of supply in turn.

Supply – large sites with detailed consent

42. Large sites with consent make up the most significant proportion of the Council's housing supply (note that a number of phases at the Weston Villages strategic sites also benefit from detailed consent, these are assessed and considered separately below in their own section).
43. At the time of preparing the April 2024 trajectory, each of the sites with a detailed consent was considered individually, and on the basis of experience, knowledge of the sites, their planning status and applying pragmatic and conservative build rates, the trajectory was compiled (Core Document I20a).
44. There are 31 large sites that benefitted from detailed consent during the monitoring period.
45. Permission has lapsed without being implemented on one site in Long Ashton. This is therefore discounted.
46. Of the remaining 30 sites with an extant consent, 21 of them have already commenced, with 643 units across the sites recorded as under construction at the time of the site visits (March/April 2024). These are clearly therefore deliverable.
47. Referring back to the definition of deliverability in the NPPF, all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that they will not be delivered within five years.
48. There is no such evidence that I am aware of for the nine remaining sites that are yet to commence. None are of such a scale that they cannot be delivered in their entirety within five years. Having reviewed them all I am satisfied that, in accordance with the framework, they are deliverable.
49. Summary notes to this effect are included within the notes column of the housing trajectory and I see no need to repeat them here.

Conclusions on large sites with detailed consent

50. Total supply from large sites with a detailed consent (excluding phases of the Weston Villages strategic development as explained above) is therefore 1,278 dwellings.

Supply – large sites with outline consent

51. A total of 11 large sites benefitted from outline consent during the monitoring period. The net capacity of these sites is a combined total of 612 dwellings.

52. These sites have each been assessed individually. Their deliverability has been considered in accordance with the terms of the framework and I have engaged with developers and promoters, having regard to the examples in the NPPG of what may constitute clear evidence to support reliance upon sites with an outline consent. I note that this list is not exhaustive, and I have set out my conclusions in respect of each large site with outline consent below, using my detailed knowledge of the sites and exercising my professional judgement.

Land to the west of M5 and east of Trenchard Road, Weston-super-Mare

53. Outline consent was granted for up to 75 new dwellings in November 2020. Work progressed towards discharging conditions and a reserved matters application was made in 2022.

54. The reserved matters application was withdrawn by the applicant in May with no detailed written explanation given.

55. I have since discussed this with the planning officer who was dealing with the application. He has spoken to the landowner who advises that they are in talks with a developer and that they still intend to deliver the site within the short term. Whilst a site of this size is clearly capable of being delivered within five years, on balance, at present I have taken a cautious approach given the recent withdrawal and I do not rely upon this site within the five-year supply.

Land at Weston Rugby Club, Drove Road, Weston-super-Mare

56. This site secured consent by way of a hybrid application: full consent was granted for offices, medical services, a new club house and changing facilities to serve the existing rugby club and outline permission granted for 182 residential units and flexible E use classes. The permission was granted in November 2022.

57. Since then, a non-material amendment application was made in December 2023. This was granted on the 30 January 2024, allowing the addition of a child and adolescent mental health services facility to the medical provision already consented, minor building position changes to accommodate this and reconfiguration of the approved car parking layout.

58. I have engaged with the agent for the proposal in respect of the timeline for delivery of the residential element of the scheme. The agent confirmed that it is intended to submit a reserved matters application for the residential element next year. The timescales agreed between us assume a build programme of three years, delivering around 60 apartments per annum. These figures are included within the trajectory. Email correspondence to support my position is provided within the appendix to my proof on page 3.

Mead Vale Shopping Centre, Nightingale Close, Weston-super-Mare

59. This site is allocated for residential development in the adopted Site Allocations Plan, which was adopted in 2018. It now benefits from outline consent for a redevelopment scheme which will deliver 10 maisonettes and 19 dwellings on an under-used car park that is in poor condition. The application was first submitted in 2020, and subsequently approved in 2022. Following this, a S106 legal agreement was agreed and completed, securing contributions towards fire hydrants and bus stop improvements.

60. I consider that significant progress has been made towards delivery of this site since it was first identified as suitable for residential development in principle when it was included as an allocation in the Site Allocations Plan. It is of a modest scale, capable of delivery within the immediate five-year period and as

such should be relied upon as deliverable supply.

Land adjacent to Woodside Avenue, Weston-super-Mare

61. Outline consent was granted for this small development of 16 residential units in July 2022.
62. Subsequently a reserved matters application has been submitted and is still being considered at the time of writing.
63. I made contact with the director of Grassroots Planning who are acting as the agents for the developer Edenstone Homes, in June. He responded the same day to provide an update on the reserved matters application and confirm that the 16 dwellings will be delivered next year. The email correspondence is included within the appendix to my proof on page 6 and the trajectory reflects this.

Land off Anson Road, Weston-super-Mare

64. An outline application was submitted in December 2021 and validated in January 2022 by a local housebuilding company for 70 dwellings adjacent to the settlement boundary of the principal town of Weston-super-Mare. All of the application documentation is predicated on an anticipated start on site by 2026.
65. The application was reported to the Council's Planning and Regulatory Committee in December 2022 with an officer recommendation to grant consent, subject to completion of a S106 agreement. This recommendation was endorsed by the members.
66. Work then continued to negotiate the contributions required and produce the legal agreement. This was completed in October 2023. This represents significant progress since the resolution to grant consent, at both time and cost to the applicant. As such it is my considered opinion that this site is deliverable and 70 dwellings are included within the trajectory across years four and five to allow time for the reserved matters consent to be secured and conditions discharged before commencement.

Former Mooseheart Lodge (Kildare House), Woodborough Road, Winscombe

67. This site benefits from a hybrid consent, where full permission exists for the redevelopment of the former guest house to an eighteen-bed boutique hotel, wedding and events venue, and outline consent is in place for 14 residential dwellings. This permission was granted in March 2022.
68. Subsequently an application was made for a non-material amendment to the proposal in June of that year.
69. Despite the full consent in place no work has taken place on the commercial element of the scheme as yet and at the time of writing I am not aware of any progress with the residential element either.
70. On this basis, whilst the scheme could still come forward in the short term, there is no clear evidence to demonstrate that the site can be relied upon for imminent delivery and on balance I have discounted the 14 units capacity from the deliverable supply.

Land at Rectory Farm, Yatton

71. An outline application was submitted to the LPA in early 2021 for a residential development of 100 dwellings. Following an initial refusal in May of the same year an appeal was lodged. This was subsequently allowed following a public inquiry, and outline planning permission was granted in June 2022.
72. Since then significant progress has been made towards delivery. The site has been purchased by St Modwen Homes and a reserved matters application was validated in 2023 for 98 units. A number of conditions have been discharged and work is ongoing to discharge those that remain outstanding alongside the reserved matters application.
73. Email correspondence with the planning manager at St Modwen Homes (copy within my appendix document at page 8) confirms an anticipated start on site in 2025. A three-year build programme is anticipated, confirming that the site is

deliverable within the five-year land supply time frame.

Land at Farleigh Farm, Backwell

74. This development was granted outline consent in June 2022 for up to 125 dwellings following a successful appeal.
75. Earlier this year reserved matters consent was granted for the erection of 90 dwellings, including provision of an additional six self build plots which will be the subject of a separate reserved matters application. The 90 dwellings (88 net gain, taking account of the loss of two dwellings recently demolished to create the access) are accounted for within the sites with detailed consent section.
76. The six self build units with outline consent are considered deliverable given the progress on the wider site, work on which has recently commenced following the initial demolitions.

Land west of Rodney Road, Backwell

77. Outline planning permission was granted for up to 65 dwellings in March 2024, with the permission being accompanied by a S106 legal agreement.
78. The reserved matters application had already been prepared by the applicant Taylor Wimpey and their agent, now comprising 60 dwellings, and was immediately submitted following outline approval, and validated in April.
79. I discussed this site with the planning officer dealing with the reserved matters application. Given the rapid progress made through the planning application process, and the fact that this site is being delivered by a volume housebuilder, we are in agreement that the site is deliverable, with commencement expected next year.
80. This has subsequently been confirmed by the planning and design manager at Taylor Wimpey's Bristol office via email (copy within the appendix to my proof on page 11). His timeline would actually see full completion of the site more quickly than I initially anticipated.

Land south of Greenhill Road, Sandford

81. Planning and Regulatory Committee resolved to grant outline consent for the development of up to 49 dwellings on this site back in October 2022. The S106 agreement was subsequently signed in April this year.
82. The reserved matters application was submitted just five days later. This remains under consideration at the time of writing, along with the discharge of conditions application submitted in May.
83. The site is owned by Stonewood Homes and Avison Young are acting as their agent. An associate planner from Avison Young confirmed via email (copy within the appendix to my proof on page 14) that commencement is scheduled for October this year. Following this, first completions are anticipated in September 2025 with final completions by early 2027.
84. This site is therefore clearly deliverable, and these figures are included in the trajectory.

Land off Purn Way, Bleadon

85. This is a site with outline consent for 14 dwellings. The permission was granted in July 2022, with a minor material amendment approved in July 2023 to revise the access arrangements. Whilst this could be considered evidence of ongoing work towards delivery of the proposal, I do not include the 14 consented units within the deliverable supply.
86. A full planning application for the same site was submitted in October 2023 for nine detached dwellings. At the time of writing this application remains undetermined.
87. Whilst the supply position could simply have been reduced from 14 dwellings to nine, I do not consider this appropriate and have therefore discounted the 14 units of capacity from the deliverable supply totals.

88. This is because of the inclusion of a small site windfall allowance within the five-year supply position. To include a site on the large site schedule which is now intended to come forward for less than ten units could amount to double counting and as such I have taken the cautious approach of discounting this site from the large site schedules in its entirety. If and when the site secures consent for nine dwellings it will be recorded on the appropriate small site schedule.

Conclusions on large sites with outline consent

89. I have discounted three of the sites for the reasons given above.

90. There is clear evidence to support the inclusion of the remaining eight sites, which have a total combined capacity of 510 dwellings.

Supply – Strategic sites with consent

91. A substantial amount of the housing supply anticipated is from the strategic major developments known collectively as the Weston Villages. These sites were first allocated for residential development in the Core Strategy in April 2012, and the subject of detailed masterplanning in the Weston Villages Supplementary Planning Document, which was produced in parallel with the Core Strategy, and adopted in June of the same year. The Core Strategy allocation was for two discreet areas, known as Winterstoke Village and Parklands Village. Policy CS30 of the Core Strategy (Core Document A1) set the context and policy framework for the developments, describing them as ‘two mixed-use, employment-led, socially, economically and environmentally sustainable new communities’.

92. The combined sites will accommodate in excess of 6,500 new homes from multiple volume housebuilders, along with significant infrastructure such as new roads, primary and secondary schools, healthcare and community facilities, employment units and retail outlets; a significant amount of which has already been delivered.

93. The first completions at the Weston Villages development were recorded on the Locking Parklands site back in 2012, on a first phase that secured full consent in isolation. A total of 2,462 homes have now been completed across all phases on both development areas at the time of the last survey in April 2024.

94. At the time of that survey a further 316 units were recorded as under construction. 820 dwellings not started benefitted from detailed consent in April 2024, and 2,784 units are covered by an outline consent.

95. I have considered each parcel within the development separately. To reach my conclusions I have engaged with landowners, developers and planning agents where possible. I liaise with the planning case officers for the schemes regularly and discuss these developments with other colleagues from service areas such as highways, housing, property and asset management and placemaking to ensure that any assumptions applied are reasonable and justified. I monitor the S106 agreements that cover these developments and track progress on the discharge of conditions. I am a member of the Locking Parklands Stakeholder Group, which includes representatives from the developers, management companies, community groups, the parish council, the schools and medical facilities, infrastructure providers and North Somerset Council. This is a useful forum to keep track of progress with delivery. Full details of each parcel of the development are listed below.

Parklands Village - Locking Parklands

96. The total capacity of this parcel of the development is 1,450 dwellings, all in the control of St Modwen and the then Homes and Communities Agency (now Homes England). Curo are delivering an affordable housing phase and Vistry Homes recently successfully acquired two phases.

97. Two initial phases first came forward under standalone full planning applications, for 100 units and 150 units. Outline consent was granted for the remaining 1,200 residential dwellings in July 2015.

98. 564 units have been completed to date. When surveyed in April 2024 there were 117 units with reserved matters consent, 83 of which were under construction. The remaining 769 dwellings have outline consent.

99. Within the outline planning application boundary a significant amount of infrastructure has already been delivered. A major spine road running from north to south through the whole Parklands Village development was included as a strategic transport allocation when the site was first allocated. The part of this road that runs through this parcel has been completed and is now known as Apprentice Way. A primary school, Parklands Educate Together, first opened in a temporary building in 2018. Since then, the permanent building was constructed and this opened in September 2020. A secondary school, Winterstoke Hundred Academy, took its first pupils in January 2024. A healthcare facility, 168 Parklands Medical Centre, also opened its doors to patients in January this year. In addition, there is a well-used community hall at the south of the site, The Radio Wing. The development is now well established and served by public transport. The next phase of development will include a retail and commercial element.

100. One residential phase is currently under construction. Vistry Homes have submitted detailed plans for two further phases, totalling 229 dwellings across both. Vistry anticipate commencement of both phases in early 2025, as set out in email correspondence contained within the appendix to my proof on page 16. Two email exchanges are provided. The first, dated 6 August 2024 advises that the application will be submitted shortly and sets out anticipated future milestones. The second, dated 15 August 2024, is addressed to both the case officer and I, advising us that the application has now been submitted.

101. 555 dwellings are relied upon as deliverable supply from this parcel, which equates to 111 dwellings a year. These figures have been provided by St Modwen who advise that their completion rates on their Parklands phases are an average of 0.7 dwellings per week, equivalent to 37 dwellings a year for each phase, and confirm that this is expected to continue.

Parklands Village – Mead Fields (land south of Churchland Way)

102. This parcel is at the northern extent of the development area and will deliver 1,150 homes in total, along with many other uses including care facilities, a hotel, employment uses, a primary school, nursery facilities, public open space, leisure and community facilities and other infrastructure. The outline consent was granted in April 2015 to Mead Realisations. Taylor Wimpey, Bellway and Mead Homes have all since secured reserved matters consents.
103. The first completions were recorded in the 2020/21 monitoring year, when 91 units were built. In 2021/22 there were 67 completions, in 2022/23 there were 111 and there were a further 101 last year.
104. 79 units were under construction at the time of the survey, with the residual 701 remaining on the extant outline not started. In addition, a care facility was under construction.
105. Despite phone calls and emails Mead Realisations is yet to respond to my requests for their anticipated delivery timescales. Given the significant ongoing progress with this site and the high annual completion rates it would be unreasonable to discount all of the units that only benefit from outline consent at this time. I have therefore exercised my judgement and rely upon 465 units of the residual capacity within the immediate five-year period. I consider this a reliable estimate, taking an average of the annual completions figures from the first four years of the development, which equates to 93 dwellings per annum as shown in Table 2 below.

Year	2020/21	2021/22	2022/23	2023/24	Total
Completions	91	67	111	101	370
Average over 4 years	93				

Parklands Village - South of Locking Head Drove

106. This parcel of the development has a capacity of 700 dwellings in total and is owned by North Somerset Council. Outline consent was granted in 2018. The first phase secured reserved matters consent for 425 dwellings in 2022.
107. Following surcharging works the Council's development partner Keepmoat Homes started on site in 2023 and the first 13 completions were recorded this year. A further 70 units had been started when the site visit took place in April.
108. Keepmoat are contractually obliged to deliver housing completions at a specified pace and there are financial incentives and penalties applicable if they deliver faster or slower. In addition, the Council itself are contractually obliged to Homes England to ensure delivery meets the targets as a result of Local Authority Accelerated Construction funding which Homes England provided to assist delivery of the site.
109. 60 dwellings per annum are included within the five-year supply position, a total of 300 dwellings, all of which benefit from detailed consent.

Parklands Village - Moss Land

110. This is a discreet parcel of the wider development that originally secured outline consent for up to 300 units in January 2018.
111. Reserved matters consent was subsequently granted in 2020 for 248 dwellings. 179 are now complete. 27 were under construction when the site was last visited, and groundworks had taken place for the remaining 42.
112. Deliverable supply within the next five years for this site is therefore 69 dwellings, all of which benefit from full consent.

Parklands Village – Mead Fields (south of Wolvershill Road)

113. This is a further Mead Realisations parcel that secured outline consent for 250 dwellings in 2017, after the initial application for 1,150 homes was granted.

114. Reserved matters consent was granted for a first phase of 88 dwellings in 2020. Taylor Wimpey have now completed 86 of these units, with just 2 remaining. These are expected to complete shortly.
115. Taking a cautious approach, whilst entirely possible that they may come forward in the short term, the residual 162 dwellings on the outline consent are not relied upon in the five-year supply given the anticipated supply from the larger adjacent parcel (Mead Fields – land south of Churchland Way).
116. Five-year supply from this phase is therefore just the 2 residual dwellings on the reserved matters consent.

Parklands Village – residual capacity

117. A residual capacity of 116 dwellings exists within the original allocation boundary.
118. This is not relied upon in the land supply position in the absence of any consent or application at the present time.
119. In addition, the emerging local plan identifies additional capacity at Parklands Village, 420 dwellings on a parcel that St Modwen and Homes England control that previously had consent for a major leisure facility that is no longer proposed, and 200 dwellings at the north of the development on Mead Realisations land following a reconfiguration of the employment and leisure parcels. These elements are considered to be longer term supply.

Winterstoke Village – Haywood Village

120. Haywood Village is wholly within the control of Persimmon Homes.
121. The first outline consent was granted in 2012 for up to 900 dwellings. Five reserved matters applications subsequently granted full permission for 898 units, all of which have been completed.

122. These 898 dwellings were delivered very quickly. The first completions were recorded in 2014 and the last just five years later in 2019 as shown in Table 3 below.

Table 3 – Haywood Village Phase 1 completions per annum						
Phase	2014/15	2015/16	2016/17	2017/18	2018/19	Total
H6, H8, H9 and H10	132	135	2	-	-	269
H5, H7 and H11	0	50	201	-	-	251
H2	0	0	33	62	-	95
H10b	0	0	6	37	-	43
H1, H3 and H4	0	0	0	62	178	240
Total	132	185	242	161	178	898

123. An average of 180 dwellings per annum were completed over the five-year period, with a peak of 242 units in 2016/17.

124. Alongside these phases a local centre, a primary school with community facilities and the first part of a new road (The Runway) were constructed.

125. The second outline consent was granted in 2018 for up to 1,650 homes, employment development, another primary school, the rest of the link road and

associated roundabouts, flood mitigation measures, landscaping, public open space and allotments.

126. Four reserved matters phases have been approved since, providing detailed consent for 936 of the units. 316 of these units have been completed, leaving 620 units with full permission and 714 with outline consent.

127. In recent correspondence regarding timing of the delivery of the second primary school a Technical Director at Persimmon advised of their anticipated short-term trajectory. An extract of this correspondence, dated 14 May 2024, is included within my appendix document on page 22.

128. That email referred to 312 dwelling completions at the time of writing and stated the intention to reach 595 by September 2025 and 715 by September 2026. That rate equates to c300 completions over the next 18 months, equivalent to roughly 200 per annum. The total forecast of an additional 400 homes in the next 2.5 years equates to an average of 160 per annum.

129. Taking a cautious approach, this figure of 160 dwellings per annum has been included within the trajectory. I consider this a conservative estimate, taking account of the past higher delivery rates that have actually been achieved. These provide reassurance that the inclusion of 800 dwellings within the five-year period is reasonable and deliverable, noting that Persimmon themselves refer to the build rate accelerating and further outlets opening.

Conclusions on strategic sites with consent

130. Taken together, for the reasons given above, there is clear evidence to support the inclusion of 2,191 dwellings from the Weston Villages developments as deliverable within the next five years.

Supply – sites with a resolution to grant consent

131. One full planning application benefits from a resolution to grant planning consent from the Council's Planning and Regulatory Committee, Land adjoining Coombe Farm in Winscombe.
132. In line with the officer's recommendation, subject to the Habitats Regulation Assessment being signed off, and a legal agreement completed, the permission will be issued.
133. HEP mitigation land has been secured and the legal agreement has now been drafted. I have discussed this site with the planning officer, who in turn has discussed deliverability with the applicant.
134. On the basis that the decision notice will shortly be issued granting full consent we agree that this site is considered deliverable within five years and should be included within the land supply position as set out in the trajectory.

Conclusions on sites with a resolution to grant consent

135. 68 units can be relied upon within the five-year supply period for the reasons given above.

Supply – extant allocations

136. Schedule 1 of the adopted Site Allocations Plan (Core Document A3) identified 95 sites as residential allocations, with a total combined capacity of 12,124 dwellings when this document was adopted in April 2018.
137. The majority of these sites have since been delivered. At April 2024 there were a total of 32 sites remaining that are allocated for residential use in either the Site Allocations Plan (or a made Neighbourhood Development Plan) that did

not benefit from planning permission.

138. Across these 32 sites the total potential capacity, on paper at least, was 2,906 dwellings.

139. Within Core Document I20a the table of large site capacity lists all 32 sites within the extant allocations section. Short summaries of the current position on each are provided in the notes column.

140. Given the passage of time since the adoption of the Site Allocations Plan in April 2018 the circumstances and capacities on many of the remaining sites have changed. Some of the smaller allocations have come forward as small sites and been recorded as such. Ongoing plan-making work as part of the emerging new Local Plan has revised the indicative capacities on a number of sites. Some are no longer considered suitable, for example where updated flood risk modelling shows that they are, or will be in future, at risk of flooding, and these are not proposed to be carried forward as allocations in the emerging plan. A couple remain in alternative uses despite their allocation status. Some of the sites are still capable of delivery, but more likely beyond the immediate five-year period.

141. Having considered each of these sites individually in a cautious way it is my current position that there is sufficient clear evidence to support the inclusion of just three of these allocations (two wholly, one in part) within the deliverable supply at present.

142. I do not consider it necessary to provide further information to the inquiry on the 29 sites that I have discounted, beyond that recorded in the large sites capacity table in Core Document I20a. I have set out full details of the three sites that I do conclude are deliverable below.

Millcross site, Clevedon

143. This site is owned by Alliance Homes, a housing association based in North Somerset. It is allocated for 70 dwellings in the Site Allocations Plan.

144. Following pre-application discussions and subsequent work the capacity has been reduced to 50 units.
145. Email correspondence from Sarah McQuatt (Head of Development at Alliance) dated 4 June 2024 advises of recent progress and sets out the following timeline.
- Planning application submission – Winter 2024
 - Planning approval – Winter 2025
 - Start on site – Spring 2026
 - Phased completion from – Spring 2027
 - Practical completion – Spring 2028
146. I agree that this timescale is reasonable and achievable for a site of this size, given the work undertaken by Alliance to date. A copy of the email correspondence is included within my appendix on page 23, and this represents clear evidence to support the inclusion of 50 dwellings from this site within the deliverable supply.

North West Nailsea

147. The Site Allocations Plan allocated this large site for 450 dwellings back in 2018. During the examination of that document pre-application advice was given to Linden Homes. Since then, flood risk modelling updates show that part of the site is now at risk of flooding in the future. On this basis the allocation has been reviewed through the emerging local plan workstreams. The conclusion of this exercise is that part of the site remains suitable for development, and when taking account of the constraints, a reduced site area and reduced capacity of 225 dwelling is now proposed in the Local Plan Regulation 19 document that was approved by the Council's Executive Committee in July this year.
148. Boyer Planning have submitted an application for 150 dwellings on the southern part of this site, on behalf of Vistry Group. The application was validated in November 2023 and is progressing towards approval at the time of writing. Given that the principle of development is established through the allocation, and

reconfirmed very recently in local plan work, only matters of technical detail are remaining to be worked through.

149. I attended a meeting on 21 May 2024 with the Strategic Developments Manager, other North Somerset colleagues and representatives of Boyer and Vistry to discuss this application. Amongst other things we discussed the work underpinning the local plan, and the alignment with this application. We discussed delivery and Vistry confirmed that this site is within their short-term delivery programme. On this basis I am satisfied that the 150 dwellings that are the subject of this live application are deliverable within five years.

150. The residual capacity of 75 dwellings on the northern part of the site are not subject to an application nor any current discussions. On this basis I do not consider there to be any clear evidence to support their inclusion and as such I discount them from the deliverable short-term supply.

Former Bournville School site, Selworthy Road, Weston-super-Mare

151. This site is also owned by Alliance Homes housing association. Significant work has been undertaken since it was first allocated, but progress had previously stalled in light of significant work needed on a technical flood risk solution.

152. Alliance have since worked with the council and the Environment Agency to develop a scheme to address this. This has resulted in a reduced capacity of 28 dwellings (due to the need for flood storage areas). This scheme has now agreed by the Council and the Environment Agency.

153. Email correspondence confirming this is contained within my appendix (see page 27 onwards). In the first email, dated 4 June 2024, Alliance's Head of Development has provided the following anticipated programme:
Planning application submission – Autumn 2024
Planning approval – Autumn 2025
Start on site – Spring 2026

Phased completion from – Spring 2027

Practical completion – Autumn 2027.

154. The second email, dated 15 August 2024, confirms the Environment Agency approval and the timeline.

155. I agree that these milestones are achievable given the significant progress made to date. This supports the inclusion of 28 dwellings within the deliverable supply.

Conclusions on extant allocations

156. I have taken a conservative and cautious approach to the remaining 32 extant allocations. My professional opinion is that a number of the residual allocations are developable and remain capable of delivery, however I do not rely upon them for five-year supply purposes given that there is an absence of clear evidence to support their inclusion at this time.

157. The current position in respect of anticipated completions within the next five years from allocated sites is therefore currently a very modest 228 dwellings.

Supply – small sites

158. At the base date of April 2024, extant planning permissions existed across 255 sites with a permission for a gain or loss of up to nine residential units, amounting to a potential net gain of 492 dwellings. These sites are listed individually in the small site capacity tab of the residential land survey data tables document (Core Document I20a).

159. Of the total 492 units capacity from this source, 48% (238 units) were recorded as under construction at the time of the last survey of small sites undertaken in March/April this year.

160. The NPPF definition of deliverable is clear that sites that do not involve major development and have planning permission are deliverable, unless clear

evidence exists to demonstrate that they will not come forward. These sites are reviewed annually.

161. Windfall sites are defined in the NPPF as ‘sites not specifically identified in the development plan’, and NPPF paragraph 72 permits their inclusion in anticipated supply figures where there is compelling evidence they will provide a reliable source of completions.

162. Windfall developments across North Somerset have historically made a significant contribution to housing delivery in previous years and this is expected to continue.

163. Table 4 sets out the windfall completion figures on small sites (those with a net capacity of up to 9 dwellings) over the current plan period so far within the district.

Table 4 – Windfall completion figures by area by year						
Year	Clevedon	Nailsea	Other	Portishead	Weston	TOTAL
2023/24	6	14	65	15	49	149
2022/23	12	17	55	9	37	130
2021/22	13	2	94	9	72	190
2020/21	7	11	98	20	40	176
2019/20	25	7	113	21	57	223
2018/19	26	22	84	22	84	238
2017/18	25	4	91	8	60	188
2016/17	33	15	61	10	52	171
2015/16	-1	20	37	7	33	96
2014/15	8	9	56	8	72	153
2013/14	22	5	60	16	34	137
2012/13	20	16	46	8	25	115
2011/12	19	4	49	4	46	122
2010/11	9	2	44	3	54	112
2009/10	19	6	39	8	96	168
2008/09	-3	9	48	23	126	203
2007/08	52	9	58	10	163	292
2006/07	20	11	72	28	118	249
TOTAL	312	183	1,170	229	1,218	3,112

164. There have been 3,112 windfall completions on small sites over the plan period to date, between 2006 and 2024. This is an average of 172.8 dwellings each year over the eighteen-year period.
165. The recent short-term trend correlates with this. Over the past five years the average small site completion rate has been 173.6 per annum.
166. Windfall developments are expected to continue to come forward at the rate seen over the plan period to date, given that flexibility exists within the development plan policy framework for small sites to come forward within and adjacent to settlement boundaries and provisions exist for subdivisions and conversions elsewhere.
167. Use of a long-term trend-based figure is considered to be robust. The fact that it broadly aligns with the current capacity of small sites with a consent (as set out in paragraph 158 above) provides further reassurance that this quantum is deliverable.

Conclusions on small sites

168. 865 small site completions are anticipated within the next five years. This equates to 173 dwellings per annum, which reflects the long-term average annual completion rate from small sites.

Supply – conclusions

169. As set out clearly and thoroughly in the sections above the Council can currently demonstrate a deliverable housing land supply of 5,140 dwellings.

Housing land supply position

170. When considered against the requirement the current amount of deliverable supply equates to 3.88 years, as per the following calculation.

$$\begin{array}{rcccl} \mathbf{5,140} & \textit{divided by} & \mathbf{1,324} & = & \mathbf{3.88 \textit{ years supply}} \\ \mathit{Deliverable supply} & & \mathit{Annual requirement} & & \end{array}$$

Progress towards restoring the land supply position

171. The Council is making progress. Prior to this appeal the most recently tested land supply position was 3.5 years (Land at Farleigh Farm appeal decision, June 2022, Core Document H1). Supply now stands at 3.88 years, with further developments coming forward.

172. Housing delivery test results also have improved, with the most recent publication showing a performance of 90% of the target. Table 5 shows the results of the official housing delivery test measurement publications for the last five years.

Table 5 – Housing Delivery Test results					
Three year period	2018 measurement	2019 measurement	2020 measurement	2021 measurement	2022 measurement
Delivery over period	2,284	2,444	2,460	2,563	2,851
Requirement for period	3,121	3,121	3,032	2,877	3,167
% result	73%	78%	81%	89%	90%
Consequence	Buffer	Buffer	Buffer	Action plan	Action plan

173. The Council's emerging Local Plan has reached an advanced stage of preparation, and the latest iteration of the Regulation 19 document endorsed by the Executive Committee on 17 July 2024 proposed sites to deliver 15,275 new dwellings over the next fifteen years.
174. Following the launch of the new Government's proposed planning reforms, including the consultation on a revised National Planning Policy Framework, the Council has made the decision not to proceed with the further Regulation 19 consultation that was originally proposed for September this year.
175. The Council remain committed to addressing housing needs and boosting the supply of new homes in sustainable locations and are reviewing the draft plan in light of the Government announcements. Whilst the proposed new standard methodology for calculating housing need is only a draft, the Government's intentions to boost supply significantly are clear. Further allocations will need to be made.
176. Irrespective of the decision to pause, work is continuing to progress on the proposed Wolverhill (north of Banwell) strategic location that is proposed to be allocated in the emerging plan. This will be a new mixed-use development accommodating around 2,800 dwellings. The proposals received a limited amount of objections during the last round of consultation. The parish council are supportive of the allocation. The majority of the site is already under the control of housebuilders and promoters (Ainscough Strategic Land, Bloor Homes, Terra Strategic and Wain Estates) who are working together with the parish council and the Local Planning Authority. The Banwell Bypass, a key piece of infrastructure required to unlock and enable this development, is already consented and work is underway, funded in part through the Homes England Housing Infrastructure Fund.
177. At this stage no reliance is placed upon any delivery from the Wolverhill proposed allocation nor any other emerging allocations in the draft plan, however clearly there is likely to be housing supply from this source in the short-medium term. By way of example, a full planning application is under consideration for 39

houses on a former police maintenance depot within Weston-super-Mare that is proposed to be allocated. A hybrid application is also before the Local Planning Authority on the Weston-super-Mare Football Club site, seeking full consent for new hospitality and facilities buildings and new stands, and outline permission for a residential development of 97 flats. The position on all emerging allocations will be kept under review.

178. Work is also ongoing to progress delivery of a number of the remaining extant allocations in the Site Allocations Plan, as referred to in the large sites with capacity table in Core Document I20a.

179. The Council are committed to bringing forward residential development of the allocations in their ownership, with work commencing on two such sites over the past year (The Uplands, Nailsea and Parklands Village). Pre-application submissions have recently been made for the next two sites on the development programme list, Dolphin Square and Walliscote Place, both of which are brownfield redevelopments in central Weston-super-Mare allocated in the Site Allocations Plan.

180. The strategic Weston Villages developments are continuing to deliver a significant proportion of overall dwelling completions each year and commitments there form a substantial part of the ongoing supply. The Council remain committed to supporting delivery of these developments.

Conclusions

181. The housing land supply position is improving and work is ongoing to boost housing supply and delivery.
182. The housing land supply requirement is currently 1,324 dwellings per annum. National policy currently requires the Council to demonstrate a four-year supply, which equates to 5,296 dwellings.
183. The Council can demonstrate a robust current deliverable supply of 5,140 dwellings, taking account of the definition of deliverable in national policy and the advice in national guidance.
184. This equates to a deliverable housing land supply of 3.88 years.
185. The current shortfall is 156 dwellings. The emerging plan is already at an advanced stage and work is being undertaken to quickly identify additional suitable sustainable and deliverable sites to boost future delivery through the planned system. The Council remain committed to supporting the development industry and partners to bring forward remaining allocations and brownfield sites to address the small shortfall that currently exists.