Town and Country Planning Act 1990 (As Amended) Town and Country Planning (Inquiries Procedure) (England) Rules 2000 (As Amended)

Appeal by Persimmon Homes Severn Valley

Land at Rectory Farm (north), Chescombe Road,

Yatton

Planning Inspectorate reference: APP/D0121/W/24/3343144

North Somerset Council reference: 23/P/0664/OUT

Housing land supply

Summary proof of evidence of:

Natalie Richards

Planning Policy Team Lead – Technical and Infrastructure

North Somerset Council



- 1. My evidence sets out the Council's current housing land supply position.
- 2. Paragraph 77 of the National Planning Policy Framework says that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to meet their requirement.
- 3. Turning first to the requirement, as the adopted housing requirement is now more than five years old the housing supply position must be assessed against the local housing need figure. This is calculated using the standard methodology set out in the National Planning Practice Guidance.
- 4. Following the four prescribed steps, the output of the standard methodology calculation for North Somerset is 1,324 homes per year.
- 5. Current national policy states that, in circumstances where a Local Planning Authority has an emerging plan that has reached Regulation 19 stage, a four-year supply should be demonstrated, rather than five. This is the case in North Somerset.
- 6. National policy also requires a buffer of 20% to be added to the land supply requirement in areas where there has been significant under delivery of housing within the past three years. Using the official measures, this is not the case in North Somerset and therefore no buffer is required.
- 7. In order to demonstrate the required four years' worth of housing supply the Council would need to demonstrate and evidence 5,296 units of deliverable supply. This is agreed between the parties.
- 8. Turning next to deliverability, the National Planning Policy Framework provides a definition of what constitutes a deliverable site.

- Essentially, small sites with consent and large sites with a detailed planning permission should usually be considered deliverable unless there is clear evidence to the contrary.
- 10. Large sites with outline consent, a permission in principle, or allocation status in a development plan document should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 11. The National Planning Practice Guidance explains that robust and up to date evidence is needed. It provides some examples of what might constitute clear evidence, such as progress towards applying for or securing detailed consent and work to discharge conditions.
- 12. Working within these parameters I am responsible for assessing the deliverability of all sites which form part of the Council's total capacity each year, and I produce the annual Residential Land Survey and Housing Land Supply Position Report and associated data tables. The April 2024 editions of these documents are Core Documents before this inquiry, documents H20 and H21 respectively.
- 13. My evidence shows that the total deliverable supply anticipated within the next five years amounts to 5,140 dwellings. This is broken down by category as follows:

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

14. The first category is large sites with a detailed consent in place. There are 31 large sites that had a full or reserved matters permission in place during the monitoring period. I have considered each site individually and I conclude that 30 of them are

deliverable.

- 15. Work has already commenced on 21 of these sites, with 643 dwellings under construction across them all. Of the nine sites that have not yet started there is no evidence that they cannot or will not be delivered within the next five years.
- 16. Therefore, total deliverable supply from large sites with a detailed consent is 1,278 dwellings.
- 17. A further 11 sites had an outline consent in place during the last monitoring period. To assess the deliverability of these sites I have engaged with landowners, developers, promoters and planning officers. I have considered each site in accordance with the terms of the framework and had regard to the examples in the practice guidance of what may constitute clear evidence to support reliance upon delivery of these sites within the next five years.
- 18.I have taken a pragmatic and cautious approach. I have discounted three of the sites where I cannot be certain that they will deliver in the short term. I have provided clear evidence and reasoned justification for my conclusions on the eight sites that I rely upon. These have a total combined capacity of 510 dwellings.
- 19. A substantial proportion of recent completions and expected supply comes from the strategic major developments known as the Weston Villages. As explained in my evidence these allocated sites will accommodate more than 6,500 homes once completed (2,784 of which have already been built), along with a significant amount of new infrastructure, much of which has already been delivered.
- 20.I have been monitoring these developments since they were first allocated back in 2012. I visit the sites regularly. I attend numerous meetings where progress and delivery are discussed. I monitor the legal agreements for these sites, keeping track of all trigger points and obligations.
- 21. My evidence shows how I have assessed each parcel and phase of the development individually. My conclusions are based on facts, evidence and

- extensive knowledge of the developments. Across the strategic location a total of 2,191 dwellings are deliverable within the next five years.
- 22. One allocated site secured a resolution to grant full planning permission during the monitoring year. The resolution to grant was subject to the Habitats Regulation Assessment being signed off and a legal agreement being completed. This has been drafted and the process is therefore almost complete, meaning that the consent will shortly be issued. Given this progress the 68 dwellings that will be consented are deliverable within the next five years.
- 23. There are a further 32 sites that are allocated for residential use in either the Site Allocations Plan or a made Neighbourhood Development Plan that do not have a consent in place.
- 24. The Site Allocations Plan was adopted in 2018 and included 95 residential sites at that time. The majority of these sites have been completed or are currently being built out. On some of the remaining sites, circumstances and capacities have changed. Work to underpin the emerging Local Plan has reassessed all of the residual allocations. Some are proposed to be carried forward, some are not.
- 25. Having considered all of the sites in the context of the definition of, and guidance on, deliverability I have reached the very conservative conclusion that just three of the remaining allocated sites should be included as deliverable supply within the next five years at present. Whilst other sites in this category remain capable of coming forward in the short term, I do not seek to rely upon them. Out of the total capacity of 2,906 units across the remaining allocations I cautiously conclude that a modest 228 dwellings should be relied upon in the land supply calculations at this time.
- 26. The final category of supply is small sites. Planning permission is in place for a net gain of 492 dwellings from this source, 48% of which are already under construction. Windfall developments have historically made a significant contribution to housing delivery in North Somerset. I have provided compelling evidence to demonstrate that windfall sites will continue to form a reliable source of

- completions. Taken together I conclude that, based on past trends, 865 units from small sites can be relied upon over the next five years.
- 27.I do not include a large site windfall allowance given recent plan-making work identifying sites that may have come forward in future as windfall developments instead being identified as emerging allocations.
- 28. Taken together, these categories amount to a total deliverable supply of 5,140 dwellings. When divided by the annual requirement of 1,324 dwellings this amounts to 3.88 years supply, marginally short of the required four years.
- 29. The Council is making progress. Housing Delivery Test results have improved over time and the supply position has increased from 3.5 years to 3.88 years.
- 30. The Council are committed to addressing housing needs and boosting the supply of new homes. The emerging Local Plan reached Regulation 19 stage last year. This document identified new allocations, some of which are already the subject of planning applications. A new strategic site was proposed in the draft plan, and work is ongoing with the developers to bring this site forward.
- 31. The Regulation 19 consultation closed on 22 January 2024. Following consideration of the representations received the plan was reviewed and revised. A new pre-submission plan was agreed by the Council's Executive Committee on 17 July 2024.
- 32. Following recent Government announcements on planning reforms and the publication of a consultation on revisions to the National Planning Policy Framework I accept that more work needs to be done and further allocations will need to be made. The Council have acknowledged this and resolved to undertake this work as quickly as possible.