

North Somerset Council

REPORT TO THE EXECUTIVE

DATE OF MEETING: 5 SEPTEMBER 2017

SUBJECT OF REPORT: SITE ALLOCATIONS PLAN: ASSESSMENT OF ADDITIONAL HOUSING SITES

TOWN OR PARISH: ALL

OFFICER/MEMBER PRESENTING: LEADER AND DEPUTY LEADER OF COUNCIL

KEY DECISION: YES

RECOMMENDATIONS

The 22 additional housing sites comprising 821 dwellings as set out in Table 1 are recommended to the Site Allocations Plan Inspector for inclusion in the plan to provide additional supply to address concerns about housing delivery identified in her letter of 26 June 2017.

1. SUMMARY OF REPORT

- 1.1 The Inspector undertaking the Site Allocations Plan examination has signalled that additional deliverable housing sites need to be identified to make the plan sound. A site assessment process has been undertaken which recommended that 22 additional sites, comprising 821 dwellings is recommended to the Inspector for inclusion in the plan. Formal consultation on any additional housing sites and any other changes will take place as part of the proposed modifications procedure prior to receipt of the Inspector's Report.
- 1.2 Appendix A contains the recommended conclusions in respect of each of the assessed sites. Appendix B summarises the responses received in relation to the overall methodology, the assessed sites and alternative locations not included.

2. POLICY

- 2.1 The Local Plan process supports all three Corporate Plan ambitions by securing prosperity and opportunity through supporting growth, improving health and wellbeing through providing housing for those in need and maintaining quality places through providing housing in sustainable locations.

3. DETAILS

- 3.1 Following the examination hearings, on 26 June 2017 the Inspector issued further written guidance relating to the delivery of housing (see background papers). She concluded that there was uncertainty whether the Core Strategy requirement of 20,985 dwellings 2006-2026 would be delivered and required the Council to test the provision of additional housing sites for 'up to 2,500 homes' within the Plan 'in order to identify the environmental costs of allocating a wider choice of housing sites'. These additional sites would not increase the overall target set out in CS13, but would help to provide flexibility and certainty that the housing requirement can be met. The increased choice and flexibility would assist the Council in demonstrating a five year supply of housing but the Inspector made it clear that the 'starting point must be to identify sites which are broadly consistent with the Core Strategy spatial strategy'.
- 3.2 The assessment process therefore identified those sites which met all of the following criteria:
- Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt).
 - Sites which have been considered through the Site Allocations Plan examination process.
 - Sites which are in the development pipeline as at 26 June 2017 – as these are more likely to be deliverable and could potentially contribute to 5 year supply.
- 3.3 In carrying out the site assessments, the Inspector urged the Council to work closely with the development industry to identify sites which developers would commit to bringing forward within the plan period and in particular within the first five years to meet the shortfall in 5 year supply.
- 3.4 The application of these criteria resulted in a schedule of 28 potential sites for assessment comprising sites being actively promoted by the development industry at the time that the Council received the Inspector's letter (see part 2 of the schedule highlighted at <http://www.n-somerset.gov.uk/wp-content/uploads/2017/07/Schedule-of-sites-to-be-assessed.pdf>). This did not include those sites which had been previously been refused or were awaiting an appeal hearing or decision, nor any sites which are inconsistent with the Core Strategy spatial strategy given the environmental cost and sustainability implications of departing from the adopted strategy.
- 3.5 The landowners/developers of these 28 sites were contacted to ask for trajectory information in respect of when they were likely to be delivered. This information was published on the website and a summary of the trajectory information published (<http://www.n-somerset.gov.uk/wp-content/uploads/2017/07/Deliverability-trajectories-provided-by-developers.pdf>).
- 3.6 To identify the environmental costs of allocating further sites, the Council considered each of the sites using a common template to assess its suitability, availability, achievability and sustainability. For consistency this broadly replicated the methodology employed at earlier stages of the Site Allocations Plan but combined the Housing and Economic Land Availability Assessment, deliverability and sustainability appraisal information for each site. This information was published on the website and interested parties invited to comment.

- 3.7 Appendix B summarises the responses received. The Inspector asked the Council to work closely with the development industry when assessing the sites and considering their deliverability. A joint development industry response was submitted on behalf of 8 developers; Persimmon Homes, Gladman Developments, Redcliffe Homes, Mactaggart and Mickel Homes, Taylor Wimpey, St Modwen, Gleeson Homes and Edward Ware Homes. These responses have been taken into account in the assessment process.
- 3.8 The 28 sites together could accommodate around 1763 dwellings. The recommended conclusions of the site assessment process in respect of each site are contained in Appendix A. Comments received in relation to the consultation on the site assessments process are summarised at Appendix B.
- 3.9 Having undertaken the site assessment process, the table below identifies the additional sites which it is recommended are included in the Site Allocations Plan to provide additional flexibility. It is anticipated that all the identified 821 dwellings are all expected to be delivered within 5 years. This reflects the Inspector's priority to identify sites capable of contributing to the delivery of the five year supply.
- 3.10 Appendix A summarises the overall recommendations in respect of each of the 28 assessed sites having considered the site assessment findings, the delivery information and consultation undertaken. It is important to understand that this is an assessment proportionate to the current stage of the plan making process. It is identifying additional capacity which has a realistic prospect of being delivered in the short term. While this process will result in the recommendation that additional sites are acceptable in principle for inclusion as allocations, this is not equivalent to the detailed appraisal undertaken on a planning application. The capacity figures are indicative but may change as sites are assessed in more detail and any constraints are better understood.
- 3.11 To understand the range of sites assessed, it is helpful to group the sites as follows (see Appendix B for a fuller description of the issues and the conclusions):

a) Sites with consent/resolution to approve

- *Barrow Hospital (66)*
- *Barrow Hospital (14)*
- *Winford Coach Station (11)*
- *Waverley House, Clevedon (21)*
- *Harbour Road/Gordano Gate (93)*

These sites have been consented since the examination hearings and can be included as allocations.

b) Sites within the urban areas

- *Dauncey's Hotel, Claremont Crescent, Weston-super-Mare (10)*
- *Site V2, Harbour Road, Portishead (10)*
- *2-6 Bay Road, Clevedon (19)*
- *26 Bristol Road Lower, Weston-super-Mare (16)*
- *Court Farm, All Saints Lane, Clevedon (10)*

The above sites are all expected to be deliverable within 5 years and with no outstanding unresolvable issues.

In response to the deliverability questionnaire, the following two sites were flagged by the landowners as being uncertain.

- *Queensway/Midhaven Rise, Weston-super-Mare (35)*
- *Weston College, Somerset Square, Nailsea (28)*

In both of these cases North Somerset has a landownership interest. In respect of the Queensway/Midhaven Rise site, it has been confirmed that the existing short term lease to the football club would not prevent development coming forward subject to alternative pitch provision being secured while the legal issues affecting Somerset Square are being resolved. Both of these sites are capable of being delivered within 5 years.

c) Sites adjacent to urban areas

- *Land to the west of the M5, Locking Parklands*
- *Land at Station Road, St Georges*

Both of these sites have significant delivery issues and neither are recommended for inclusion. The first one is adjacent to the M5 in a location where there are significant ecological, access and noise issues. It is a further extension to the Locking Parklands development and is considered unlikely to come forward during the plan period particularly given the comments of other developers who have raised concerns about delivery rates across the wider Weston Villages development. It could also prejudice delivery of a future M5 J21a scheme. Land at St Georges is a triangular site bounded by the railway, motorway and river. There is no identified access and significant constraints, so the site is not recommended for inclusion.

d) Previously developed land outside settlements

- *F Sweeting and Son, Station Road, Sandford*

The brownfield nature of the site and location in relation to Sandford makes this site acceptable despite being not adjacent to the settlement boundary of a town or service village.

e) Service village locations

- *Land south of Cadbury Garden Centre, Congresbury (21)*
- *Land at Shipham Lane, Winscombe (28)*
- *Land adjoining Coombe Farm, Winscombe (24)*
- *Broadleaze Farm, Winscombe (74)*

The above sites have been identified as being deliverable without unresolvable issues, although at Broadleaze Farm in particular layout and density issues may mean that the final dwelling capacity is lower. Three of these sites are in Winscombe, and close to the AONB but this can be mitigated through good design and landscaping, taking account of any cumulative impacts.

- *Land at Cox's Green, Wrington (28)*

This is a site which is subject to two applications; the larger site for 59 dwellings is the subject of an appeal to be held at the end of September. While the larger proposal has significant adverse landscape impacts, the smaller site is of a scale of development which it is considered could be more readily assimilated, subject to resolution of detailed layout, design, and landscape impact. The smaller site for 28 dwellings is recommended for inclusion, but the Council will continue to resist the larger site at appeal due, in particular, to its greater landscape impact.

- *Co-housing project, St Andrews, Congresbury (24)*

This is a project which has community support but is located within a very sensitive part of Congresbury in heritage terms (two Grade I Listed Buildings, conservation area, trees, and archaeology). While some development may be acceptable, at present it is not certain that more than 10 dwellings could be accommodated and

therefore the site is not proposed as a potential allocation (only sites of ten or more dwellings are specifically allocated in the plan).

f) Sites with employment implications

- *Land at Wilson Gardens/Scot Elm Drive, Weston-super-Mare (51)*
- *Land at Wyndham Way, Portishead (35)*

The employment allocation on these sites has been reviewed and the two sites are considered to be appropriate for housing given their relationship to existing residential areas.

- *Old Mill Road, Portishead (350)*

The owners of the Old Mill Road site have indicated that they would like to build 350 units as part of a redevelopment proposal. This is not supported given the need for any redevelopment to accommodate existing businesses on the site. Furthermore there is no convincing evidence that this is deliverable in 5 years. The site is not recommended for inclusion as a housing allocation, although it remains a mixed use town centre opportunity.

- *Harbour Road/Serbert Way, Portishead (93)*

This is both an employment allocation and in an area where town centre uses are acceptable. It would be inappropriate to allocate this site for residential given the need to retain some alternative employment provision in Portishead town centre. The site is not allocated for inclusion.

- *173 Kenn Road, Clevedon (60)*

This is an existing employment site in Clevedon which it is considered important to retain to ensure the continuation of a range of employment opportunities in the town. The site is not recommended for housing.

g) Sites with Joint Spatial Plan implications

The Inspector in her letter made reference to the overlap with the Joint Spatial Plan to 2036 and advised that 'sites which are allocated in the SAP and on which delivery continues beyond 2026 may contribute towards the supply required for the new Local Plan'.

- *Youngwood Lane, Nailsea (450)*

This site is likely to form part of the strategic development location being promoted through the Joint Spatial Plan. There remains a great deal of uncertainty about the form and function of this wider new development area including the strategic transport improvements and other infrastructure requirements. However, subject to reassurances about how the Youngwood Lane site would fit with the overall emerging masterplanning and contribute to infrastructure requirements, it is recommended that a first phase is released through the Site Allocations Plan. The northernmost part of the site with an estimated capacity of 170 dwellings is recommended for inclusion. The remainder of the site would be brought forward through the new Local Plan as part of a comprehensive masterplan for the Nailsea/Backwell area.

- *South of Bristol Road, Churchill (41)*

There is still considerable uncertainty as to the form of the new garden village proposal for the Churchill area and particularly the highway requirements emerging through the Joint Transport Study. The A38 is identified as a key strategic corridor linking the airport with Bristol, the M5 and Weston-super-Mare and the junction

adjacent to this site will be a critical location. It is premature at this stage to allocate development in such close proximity to a key strategic junction before highway scheme option appraisal work has been carried out as this would fundamentally compromise our ability to deliver a scheme as identified in the emerging Joint Transport Study work. However in light of the pressure to find housing sites, it is recommended that a revised site boundary be put forward for inclusion in the Site Allocations Plan that preserves potential to widen all approaches to the junction and allows for substantial re-design of the junction itself. This may reduce the overall number of units that could be delivered here.

Table 1: Additional housing sites recommended for inclusion in the Site Allocations Plan

Site	Capacity up to
Barrow Hospital	66
Barrow Hospital	14
Winford Coach Station, 10 High Street, Winford	11
Waverley House, Clevedon	21
Harbour Road/Gordano Gate, Portishead	93
Dauncey's Hotel, Claremont Crescent, Weston-super-Mare	10
Site V2, Harbour Road, Portishead	10
2-6 Bay Road, Clevedon	19
26 Bristol Road Lower, Weston-super-Mare	16
Court Farm, All Saints Lane, Clevedon	10
Queensway/Midhaven Rise, Weston-super-Mare	35
Weston College, Somerset Square, Nailsea	28
F Sweeting and Son, Station Road, Sandford	16
Land south of Cadbury Garden Centre, Congresbury	21
Land at Shipham Lane, Winscombe	28
Land adjoining Coombe Farm, Winscombe	24
Broadleaze Farm, Winscombe	80
Land at Cox's Green, Wrington	28
Land at Wilson Gardens/Scot Elm Drive, Weston-super-Mare	51
Land at Wyndham Way, Portishead	35
Youngwood Lane, Nailsea	170
South of Bristol Road, Churchill	41
Total	821

Assumptions with regard to the scale of contingency required

- 3.12 The Inspector asked the Council to test 'up to 2500 homes', but this was never intended to be a target. In fact, only 1763 dwellings were identified from sites using the Inspector's criteria. The figure of 2500 homes was referenced in the Inspector's letter because at the examination hearings development industry representatives were suggesting that the contingency should be 20% of the remaining Core Strategy requirement which had not yet been built. The robustness of this assumption was questioned in the Council's interim response to the Inspector dated 20 July 2017. The Council considered both the residual amount to which any uplift should be applied and also whether the rate should be 10% or 20%. Depending which

assumptions are used, this makes a significant difference to the scale of any contingency which would be appropriate.

3.13 The Council identified the following options in terms of the figure to which any non-implementation rate could be applied:

- Option A: The whole Core Strategy housing requirement 2006-2026 (20,985 dwellings).
- Option B: The residual number of dwellings to be built over the remainder of the plan period 2017-2026 (12,138 dwellings).
- Option C: The element of the residual housing requirement not agreed as being deliverable at the examination hearings 2017-2026 (6,473 dwellings).
- Option D: The element of the 5 year supply not agreed as being deliverable 2017-2022 (3,859 dwellings).

3.14 Applying a 10% or 20% rate (there is no national guidance on the rate to be applied) produces the following figures for the amount of housing which may be appropriate to identify as a contingency (Option A is excluded as it makes no sense to apply the rate to existing completions):

Amount of the housing requirement to apply uplift to	Rate to be applied	
	10%	20%
Option B: 12,138	1,214	2,428
Option C: 6,473	647	1,295
Option D: 3,859	386	772

3.15 The recommended contingency as a result of the site assessment process is 821 dwellings. Considering this contingency in relation to the above table, this provides sufficient additional supply to address that element of the 5 year supply not agreed with the development industry (Option D) and also the unagreed plan period sites (Option C) when using a 10% rate. This represents a significant boost to supply which would increase the overall Core Strategy supply figure from 21,281 to 22,102 dwellings, providing increased certainty that the Core Strategy requirement of 20,985 dwellings would be delivered by 2026.

3.16 Furthermore, the development plan is about to be reviewed through the Joint Spatial Plan and new Local Plan, so in practice the Site Allocations Plan is not going to run its course to 2026. That means that the housing requirement will be reassessed in relation to the emerging Joint Spatial Plan requirements within a short space of time.

3.17 The development industry joint response did not agree with the Council's approach to the assessment methodology or the conclusions as to what would be sufficient contingency. The developers argue that the Council should be testing 2,500 houses, even if this meant going outside the parameters for the exercise set out by the Inspector in her letter. In particular, they wanted new sites to be included in the assessment – either sites which are in the Council's view contrary to the Core Strategy framework or not currently in the development pipeline, as they suggest other sites might be equally deliverable (this conflicts with their position at the hearings where it was argued that unless the site was in the development pipeline, there was little chance of it being delivered within 5 years). The development industry also argued that the allowance should apply to the whole of the remaining residual to 2026 (Option B above).

- 3.18 The Council's response will be sent to Inspector who will then consider the next steps in the examination process.

4. CONSULTATION

- 4.1 Comments were invited from interested parties on the assessment process. Town and Parish Councils have also been notified of the process. There will be a formal consultation on all the proposed modifications to the plan (including the proposed additional housing sites) which will be taken into account by the Inspector before she issues her Inspector's Report.
- 4.2 Appendix B sets out a summary of the comments received on the assessment process. These have been taken into account in the conclusions reached for each of the sites.
- 4.3 The Inspector was keen for the Council to work with the development industry and we have taken account of the responses received, particularly the joint response on behalf of 8 parties. There were also responses from Environment Agency, Town and Parish Councils, local residents and other promoters of land.

5. FINANCIAL IMPLICATIONS

- 5.1 The Council is required to bear the costs of the examination process including the costs of the Inspector and Programme Officer. The Inspector's costs are anticipated to be approximately £1000 per day. The estimated costs of the Site Allocations Plan examination has been built into the commitment set aside by the Planning Policy/Strategic Projects budgets. The final figure will be determined by the length of the examination process but this piece of work is not expected to have any significant financial impact on the overall programme budget.

6. RISK MANAGEMENT

- 6.1 Without addressing the housing supply issues identified by the Inspector there is a strong likelihood that the plan will not be found sound. That would mean continued uncertainty in terms of responding to development pressures and appeals.

7. EQUALITY IMPLICATIONS

- 7.1 Additional housing supply will increase the amount of affordable housing and the range and choice of development types and locations.

8. CORPORATE IMPLICATIONS

- 8.1 The proposed new housing locations will have implications for service delivery.

9. OPTIONS CONSIDERED

- 9.1 Failure to address the Inspector's concerns is likely to have led to the plan not being found sound.

AUTHOR

Michael Reep, Planning Policy Manager

BACKGROUND PAPERS

Inspector's letter to the Council following closure of the hearings on 18 May 2017: <http://www.n-somerset.gov.uk/wp-content/uploads/2017/02/ID-4-Inspectors-Note-to-Council-following-hearings.pdf>

NSC interim response to the Inspector's letter 20 July 2017: <http://www.n-somerset.gov.uk/wp-content/uploads/2017/02/CD2-Council-interim-response-to-Inspectors-letter-ID4-20-July-2017.pdf>

Site Allocations Plan examination: further residential site assessments: <http://www.n-somerset.gov.uk/my-services/planning-building-control/planningpolicy/sites-policies-development-plan-document/site-allocations-plan-examination-further-residential-site-assessments/>

Appendix A: NSC conclusions on the sites assessed

Site	Indicative capacity	Planning status	Reference	Conclusions	Recommendation
Sites with consent/resolution to approve					
Barrow Hospital, Barrow Gurney	66	Applications	15/P/2301/F	<p>Planning consent has now been granted subject to S106. The site was formerly used as a psychiatric hospital until its closure in 2006 and most of the former buildings have been demolished. Although the site is in the countryside and in the Green Belt, its former use means that it is defined as previously developed land. The site has previously had consent for offices (up to 24,000 square metres), then a care village. Neither permission has been implemented, despite marketing efforts. 43 houses within the site are already under construction, following their consent in 2013. Whilst the site cannot be considered to be well related to existing settlements and it is unlikely to encourage sustainable travel, this must be seen in the context of the previous permissions and previously developed status of the site. It must also be taken into account that housing is already under construction in this location under a separate consent, and the developer advises that these additional dwellings can be completed within three years.</p>	Identify within Schedule 1 of the plan for 66 dwellings, with reference to details of current consent.
Barrow Hospital, Barrow Gurney	14	Applications	15/P/2302/F	<p>Planning consent has now been granted subject to S106. The site was formerly used as a psychiatric hospital until its closure in 2006 and most of the former buildings have been demolished. Although the site is in the countryside and in the Green Belt, its former use means that it is defined as previously developed land. The site has previously had consent for offices (up to 24,000 square metres), then a care village. Neither permission has been implemented, despite marketing efforts. 43 houses within the site are already under construction, following their consent in 2013. Whilst the site cannot be considered to be well related to existing settlements and it is unlikely to encourage sustainable travel, this must be seen in the context of the previous permissions and previously</p>	Identify within Schedule 1 of the plan for 14 dwellings, with reference to details of current consent.

				developed status of the site. It must also be taken into account that housing is already under construction in this location under a separate consent, and the developer advises that these additional dwellings can be completed within three years.	
Winford Coach Station, 10 High Street, Winford	11	Application	17/P/1146/RM	Outline planning consent granted and reserved matters under consideration. This previously developed site (a former coach station) has been unused and derelict for a number of years. Alternative commercial uses could potentially have an unsatisfactory impact on neighbouring residential properties. The scheme as approved includes environmental benefits for the community, including a coach stop for school buses to improve safety arrangements. It is within the settlement boundary of Winford, which is an infill village washed over by Green Belt.	Include within Schedule 1 of the plan for 11 residential units, referring to the requirements as per conditions of consent.
Waverley House, Clevedon	21	Application	17/P/0720/CUPA	Site within the settlement boundary of Clevedon with good access to a wide range of services and facilities. This previously developed vacant office site has secured consent for residential development under the Prior Approval process. Site expected to be completed within three years as per the conditions of consent.	Add site to Schedule 1 of the plan for 21 units as per consent.
Harbour Road/Gordano Gate, Portishead	93	Application	16/P/2066/F	This site was considered at Planning and Regulatory Committee on 9 th August 2017, who resolved to approve the scheme subject to a S106 agreement. This site is within the settlement boundary of Portishead and has good access to a range of services and facilities. It is a previously developed site that was proposed to be allocated for employment purposes in Schedule 2 of the Site Allocations Plan. It has benefitted from consent for employment for a number of years, and despite marketing, has not been developed. The adjoining employment building has already been converted to 22 residential units under the permitted development change of use regulations within the past year. The full planning is for 93 residential units, and 420 square metres of B1 office. The proposed conditions reflect the flood risk status of the site.	Include the site in Schedule 1 of the plan as a mixed use site, for 93 dwellings and 420 square metres of office space, as per current application.

				The site is in the control of a development company who have provided a trajectory for bringing development forward within two years. Given the existing residential conversion on the site and the need to retain employment opportunities in Portishead, it is considered appropriate to develop the site for mixed use.	
Sites within the urban areas					
Dauncey's Hotel, Claremont Crescent, Weston-super	10	Pre-application	17/P/0749/PRE	Previously developed site within the existing built up area of Weston-super-Mare and well located to access the services and facilities that the town has to offer. This is a proposed reconfiguration of part of the existing hotel to accommodate 10 flats, to release funds to renovate the remainder of the hotel. There are no technical issues which cannot be resolved, although this is a listed building and is within an 'at risk' conservation area, and the design must be sympathetic to the heritage and design issues.	Include the site within Schedule 1 of the plan for 10 residential units.
Site V2, Harbour Road, Portishead	10	Pre-application	17/P/0619/PRE	Site within the town of Portishead and now surrounded by a mix of development with good access to facilities and services. This site has previously had consent for commercial use on the ground floor and seven residential units above. This has expired. The current proposal is for a five storey mixed use building, providing A1 uses on the ground floor with offices above, and 10 residential flats in the upper storeys. This has been considered as acceptable through the pre-application process.	Include within Schedule 1 of the plan, as a mixed use scheme, including 10 flats on the upper storeys.
2-6 Bay Road, Clevedon	19	Application	17/P/1078/F	Site within the settlement boundary of the town of Clevedon. This site is previously developed and within an existing residential area, within walking distance of local shops and facilities. Ecological constraints have been identified, which can be mitigated against through the planning application process. A full planning application is under consideration for this scheme, and the agent advises that once consent is secured the care home use will cease, and the site will be marketed. Completions are expected to be achieved by 2020.	Identify site in Schedule 1 of the plan for 19 residential units.
26 Bristol Road Lower, Weston-super-Mare	16	Pre-application	17/P/1390/PRE	Previously developed site within existing built up area of Weston-super-Mare, surrounded by residential uses.	Include within Schedule 1 of the

				<p>Good access to services and facilities.</p> <p>Large Victorian property with numerous modern extensions, last used as a care home, now vacant.</p> <p>Suitable in principle, design must consider heritage assets, and layout must take account of parking requirements.</p>	<p>plan, with reference to heritage assets and parking requirements.</p>
Court Farm, All Saints Lane, Clevedon	10	Pre-application	17/P/0374/PRE	<p>Previously developed site located mainly within the settlement boundary of Clevedon. Good access to local facilities and services. Small part of site at the southern edge is within the Green Belt, although this does not preclude development on the remainder of the site. Current indicative layout avoids built form within the Green Belt. There are ecological and heritage constraints identified that need to be addressed through the planning application.</p> <p>Given proximity to Grade 1 Listed Clevedon Court, the design must be agreed by Historic England.</p> <p>Agent advises an anticipated trajectory with completion expected by 2020.</p>	<p>Include within Schedule 1 of the plan for 10 units, with an amended boundary which excludes the Green Belt element of the site.</p>
Queensway/Midhaven Rise, Weston-super-Mare	35	Pre-application	16/P/1033/PRE	<p>The site is within Weston-super-Mare and has access to a range of facilities and services.</p> <p>The response to the deliverability questionnaire was that it was not possible to confirm a deliverability trajectory. The site is in ongoing use as a football pitch, and has been leased by the Council to a local junior football club, for a period of 3 years. Whilst at present no site has been identified to relocate the football club, subject to this being resolved, the site is suitable and considered deliverable within 5 years.</p>	<p>Include site within Schedule 1 of the plan for 35 dwellings, subject to relocation of football club.</p>
Weston College, Somerset Square, Nailsea	28	Application	15/P/0977/O	<p>This site is located within Nailsea Town Centre, with good access to the town's services and facilities.</p> <p>The response to the deliverability questionnaire was that it was not possible to confirm a deliverability trajectory. The site comprises previously developed and has been vacant for some time.</p> <p>Redevelopment would support the regeneration of the town centre. It is expected that the ownership issues can be resolved and the site can come forward in the short term.</p>	<p>Include site within Schedule 1 of the plan for 28 units as per application.</p>
Sites adjacent to urban areas					

Land to the west of the M5, Locking Parklands	120	EIA screening request	17/P/1414/EIA1	<p>This site is adjacent to the settlement boundary of Weston-super-Mare, at the eastern edge of the Locking Parklands development next to the M5 motorway.</p> <p>This area is subject to significant ecological, access and noise constraints, and there is no evidence that these can be mitigated against, given the proximity to the motorway, and could raise viability issues. Development would require environmental impact assessment. Use of this land may be prejudicial to future strategic highway improvements associated with delivering M5 Junction 21a as identified in the Joint Transport Study.</p> <p>Whilst the promotor states that this site is deliverable within five years this conflicts with the opinions of the developers currently delivering the Weston Villages schemes.</p> <p>At this stage, whilst the site has been subject to a screening request there have been no further details submitted.</p> <p>It is therefore not proposed that this site be allocated for residential use in the Site Allocations Plan.</p>	Site is not considered suitable for residential development.
Land at Station Road, St Georges	45	EIA screening request	15/P/0839/EIA1	<p>Site is adjacent to the settlement boundary of Weston-super-Mare. This is a triangular greenfield site bounded by the railway, M5 motorway and river and therefore with significant constraints to delivery in terms of identifying a suitable form of development. An EIA screening request was submitted in 2015, however this has not been followed up by any pre-application or application submission and therefore there is no evidence of deliverability at this time. Access arrangements are yet to be secured and could prove costly as they will require a river crossing. Given the extensive constraints there is no certainty that either an acceptable form of development can be identified or that delivery could take place during the plan period.</p>	This site is not proposed to be taken forward as a residential allocation.
Previously developed land outside settlements					
F Sweeting and Son, Station Road, Sandford	16	Application	17/P/0606/O	<p>Previously developed site, redundant industrial depot used in the past for HGVs and a variety of B1 and B2 uses.</p> <p>Footway linking the site to the village of Sandford must be improved.</p> <p>Potential for impact upon the AONB which must be considered through detailed layout.</p>	Identify within Schedule 1 of the plan for 16 dwellings with reference to footpath

				Ecological and flood risk constraints to be mitigated against through planning conditions. Initial concerns over deliverability have been overcome through application process.	clearance and conditions on ecology and flood risk.
Service village locations					
Land south of Cadbury Garden Centre, Congresbury	21	Application	16/P/2982/O	Site is within the service village of Congresbury and close to services and facilities, although these are located on the other side of the A370. Highway access is being resolved through the planning application process and the applicant has demonstrated that safe access can be achieved and the site can be delivered within three years.	Include within Schedule 1 of the plan for 21 dwellings.
Land at Shipham Lane, Winscombe	28	Pre-application	15/P/0280/PRE	The site is adjacent to the settlement boundary of Winscombe, which offers a range of facilities and services. It is currently in agricultural use which the agent advises is within the control of the landowner to cease at any time. Trajectory as proposed expects completions by 2020. Site is owned by the same landowner as the Coombe Farm site, and there is potential to link the sites through the land in between, also in the same control. Subject to a safe access arrangement being agreed, any allocation to be outside of the AONB and future layout to consider impact on the AONB, the site is considered suitable for residential.	Include within Schedule 1 of the plan for 28 dwellings, with an amended boundary excluding the part of the site that is within the AONB. Allocation to refer to mitigating impact on AONB through layout and design.
Land adjoining Coombe Farm, Winscombe	24	Pre-application	17/P/1282/PRE	Site is adjacent to the settlement boundary of Winscombe and is close to local facilities and services. Site is owned by a developer who proposes to bring the site forward for a low density park homes scheme. A trajectory has been provided, showing that development is expected to complete within 3 years. The site is in the same ownership as the Shipham Lane site, and joint access arrangements are being considered.	Include within Schedule 1 of the plan for 24 residential dwellings, with reference to mitigating impact on AONB through layout and design.

				Subject to safe access being achieved and the layout respecting the adjacent AONB the site is considered suitable for residential development.	
Broadleaze Farm, Winscombe	80	Application	16/P/2795/O	<p>Site is suitable in principle as it is adjacent to the settlement boundary of Winscombe.</p> <p>Currently the technical issues in relation to ecology, access and flooding are being worked through as part of the planning application. It is anticipated that these issues can be satisfactorily resolved. Detailed layout must consider potential impact on the AONB, which may result in a reduced capacity.</p> <p>An amendment to the planning application has been submitted, proposing 74 dwellings.</p>	Include within Schedule 1 of the plan, for up to 74 dwellings.
Land at Cox's Green, Wrington	28	Application	17/P/0485/O	<p>Site is adjacent to the settlement boundary of Wrington, which is a Service Village. Subject to ensuring safe pedestrian access arrangements (as part of the current application) the site will be served by local facilities and services.</p> <p>The larger scheme previously proposed is subject to significant landscape objections (and is currently at appeal), however the smaller scheme is considered to be capable of assimilation into the village (subject to layout, design and landscape impact).</p> <p>Measures to address any local flood risk impacts will be important in facilitating development of the site. This must be dealt with by conditions attached to any planning consent.</p> <p>The site is within the control of a housebuilder, who advises that site is deliverable within two years.</p>	Identify the site within Schedule 1 of the plan for 28 dwellings, with reference to requirement for measures to address any impact on local flooding issues.
Co-housing project, St Andrews, Congresbury	24	Pre-application	17/P/0763/PRE	<p>The site is mostly within the settlement boundary of Congresbury and is well related to the services and facilities within the village.</p> <p>Whilst the scheme proposed is considered deliverable by the agent there are currently concerns as to whether a safe access can be achieved, and whether the impact on the two Grade I Listed Buildings and the Conservation Area can be mitigated against. There is also known archaeology on the site, and part of the site area is proposed to be designated as Local Green Space.</p> <p>Currently it cannot be confirmed that the constraints identified can be mitigated against, and it may result in a much lower capacity.</p>	Site not proposed to be included within Schedule 1 of the plan.

Land at Wilson Gardens/Scot Elm Drive, Weston-super-Mare	51	Application	17/P/0752/F	<p>This site is within the settlement boundary of the town of Weston-super-Mare and has good access to services and facilities.</p> <p>Whilst there are likely to be ecological and flood risk constraints to address, these can be mitigated against and the site is considered to have potential for residential development.</p> <p>The site is currently proposed for employment development in Schedule 2 of the Site Allocations Plan, however it has been allocated for some time with no activity, therefore its proposed use has been reviewed.</p> <p>Evidence of deliverability for the current application has been provided by the agent, and the site is already in the control of a housebuilder who confirms it can be delivered within three years.</p>	Propose to take forward inclusion of this site in Schedule 1 of the plan for 51 dwellings as per current application.
Land at Wyndham Way, Portishead	35	Application	17/P/1229/F	<p>The site is located within the settlement of Portishead with good access to services and facilities.</p> <p>The site was previously allocated for employment use within the Replacement Local Plan, but this was reviewed through the Site Allocations Plan. It has also benefitted from a previous consent for office use, which was not implemented.</p> <p>This site is now surrounded by existing residential units and is considered more appropriate to develop for housing.</p> <p>Suitable access arrangements and parking layout must be agreed through the planning application. Overspill parking on the highway is not acceptable in this location.</p>	Include within Schedule 1 of the plan for 35 residential apartments, subject to parking requirements being met on site.
Old Mill Road, Portishead	350	Pre-application discussion	-	<p>This is a previously developed site within the settlement boundary of Portishead, and in a town centre location with good access to facilities and services.</p> <p>The site is identified in the plan for possible redevelopment incorporating a mix of employment uses, retail, leisure, cafés, bars and restaurants and potential for a small amount of residential (no specific housing number is identified in the Site Allocations Plan).</p> <p>The developer has provided information to the council proposing 350 residential units as part of a mixed use scheme, with details of leasing arrangements and phasing, and a trajectory.</p> <p>There are significant local objections to the proposals, with concerns that existing businesses would be displaced with no alternative</p>	This site is not proposed to be allocated for 350 residential units within the plan, and will remain a mixed use town centre opportunity.

				<p>suitable premises available, and concerns about the impact of additional dwellings in this location.</p> <p>There are also concerns around school place demand that would arise from a scheme of this size in Portishead.</p> <p>There is currently no assurance that the site is deliverable within five years because of uncertainty around the redevelopment, the need to support existing businesses and retain employment opportunities in the town</p>	
Harbour Road/Serbert Way	93	Pre-application	16/P/1265/PRE	<p>This site is within the settlement boundary of Portishead and within the town centre boundary as adopted in the Development Management Policies Plan.</p> <p>This is a previously developed site that is identified for employment in Schedule 2 of the plan. It is still considered that this site has potential to support a range of local employment uses.</p> <p>The agent advises that the site could be developed for residential assisted living units within three years.</p> <p>There are concerns that sufficient marketing for business employment uses has not been undertaken in the context of the current allocation.</p>	This site is not proposed to be taken forward as a residential allocation, and will remain in Schedule 2 of the plan as a proposed employment site.
173 Kenn Road, Clevedon	60	Pre-application	17/P/1489/PRE	<p>Site is within the town of Clevedon, in a built up area with good access to services and facilities and is adjacent to the Tesco supermarket.</p> <p>Previously developed site, in current use for employment. This site is safeguarded for the existing B uses in Schedule 3 of the Site Allocations Plan, and has been fully occupied, although the agent advises that one of the two units is now vacant.</p> <p>Site is adjacent to other commercial uses and there is a risk that there will be residential amenity issues. Any forthcoming application would require a transport assessment.</p>	This site is not proposed to be taken forward for residential use, and will remain a safeguarded employment site.
Sites with Joint Spatial Plan implications					
Land north of Youngwood Lane, Nailsea	450	Application	16/P/1677/OT2	<p>Site is south of the town of Nailsea, and would form a substantial extension into the adjacent countryside on lower lying land.</p> <p>The site has potential to come forward as part of the comprehensive expansion of South West Nailsea proposed through the emerging Joint Spatial Plan. The JSP is at an early stage and there are considered to be significant risks of the site being planned and developed in isolation of agreement on the wider strategic development including the</p>	Include the northern part of the site only to accommodate 170 dwellings within Schedule 1 of the plan

				<p>potential to hinder effective and joined-up planning and delivery of strategic development, infrastructure and transport solutions. This includes the location of new roads linking South West Nailsea to the station and the A370 (including two possible rail crossings), and a possible link to M5 J20 at Clevedon, as well as metrobus links, including to the new district centre.</p> <p>Although trajectory information has been provided it is considered ambitious for a site of this size, particularly given uncertainties about the form and phasing of development which might be appropriate for the wider JSP strategic development location. However it is recognised that the site could form an early release within the SAP plan period provided that it is demonstrated that the development would positively support and not prejudice the emerging wider strategic proposal. This would require a reworking of the current proposal to ensure that it would be delivered as part of a comprehensive development rather than a stand-alone site. The northernmost three fields lie adjacent to the edge of Nailsea and these would have the most potential for early release. Together they comprise 8.4 hectares, which using 50% net residential area and 40 dwellings/ha produces an indicative capacity of 170 dwellings.</p>	<p>subject to satisfactory reassurance that this will not prejudice the masterplanning and delivery of strategic transport and other infrastructure planned as part of a comprehensive strategic development location through the Joint Spatial Plan.</p>
Land south of Bristol Road, Churchill	41	Application	17/P/1200/F	<p>There is still considerable uncertainty as to the form of the new garden village proposal for the Churchill area and particularly the highway requirements as part of the A38 improvements. However the work undertaken to support the JSP identifies the need not just for strategic infrastructure interventions but also mitigation on the existing network and this location will be critical in that mitigation package. Work is underway to take forward the recommendations in the emerging Joint Transport Study and develop improvement options on this key strategic corridor linking the airport with the M5 and Weston-super-Mare. It is premature at this stage to allocate development in such close proximity to a key strategic junction before option appraisal work has been carried out as this would fundamentally compromise our ability to deliver a scheme as identified in the Joint Transport Study work. There is a risk that failure to achieve transport capacity targets in the emerging JTS could compromise longer term plans for delivery of</p>	<p>Include within Schedule 1 of the plan for 41 dwellings with reference to drainage requirements and subject to a satisfactory site boundary being agreed which does not prejudice future strategic</p>

			<p>housing and economic growth. However in light of the pressure to find housing sites, it is recommended that a revised site boundary be put forward for inclusion in the Site Allocations Plan that preserves the potential to widen all approaches to the junction and allows for substantial re-design of the junction itself. This may reduce the overall number of units that could be delivered here.</p> <p>Site is south of Langford and well related to existing services and facilities, although located on the other side of the A38. Subject to a reduced footprint and detailed layout of the site not conflicting with the emerging JSP/JTS (in particular possible new highway infrastructure and junction improvements), the location could be considered suitable for residential development.</p> <p>Drainage solution must also be agreed before consent can be granted. Agent advises that site is deliverable in full within 3 years.</p>	transport improvements.
--	--	--	--	-------------------------

Appendix B: Summary of comments received on the site assessment process

Name	Site/issue	Summary of response received	NSC response
General comments on methodology and overall site assessments			
<p>Development industry joint response: Persimmon Homes, Gladman Developments Ltd, Redcliffe Homes, MacTaggart & Mickel Homes, Taylor Wimpey, St Modwen, Gleeson Homes, Edward Ware Homes</p>	<p>Methodology and site assessment process (detailed comments on sites submitted by individual contributors)</p>	<p>NSC's role at this stage is limited to testing the provision of additional allocations to achieve the additional site allocations ie 2500 dwellings. In relation the NSC interim response (CD2) it is fundamentally wrong to revisit the calculation of the appropriate allowance – must use option B. In testing 2,500 figure, must not fall into the trap of only considering sites broadly consistent with the Core Strategy – this may rule out sites in the development pipeline which are deliverable. Need to balance deliverability against policy. NSC has not assessed sites which are in accordance with the Core Strategy but not in the development pipeline. It could be argued that sites promoted over a period of time but not pre-apps or applications may have a better evidence base demonstrating deliverability. Sites refused and at appeal should be reassessed. NSC has failed to accept omission sites which could easily be facilitated into the development pipeline. NSC has therefore underestimated potential supply.</p> <p>Process for selecting sites as being broadly in conformity with Core Strategy is neither transparent nor robust. For example, inconsistency in dealing with 'countryside' sites as some sites are categorised as 'town' or 'village extension'; a review of settlement boundaries would have resulted in more sites being adjacent; sites previously identified as being in conformity are now excluded. It is</p>	<p>The Council disagrees that the Inspector has effectively identified a target of 2,500 dwellings and that the Council should step outside the parameters of the assessment as clearly set out in her letter. The testing of up to 2,500 dwellings was predicated on clear advice that these should be consistent with the extant Core Strategy and identifying sites in the development pipeline which the development industry at the examination hearings emphasised in terms of ensuring delivery. At this stage in the process it is not appropriate to widen the scope or include additional sites. The comments on sites are broadly consistent with the recommendations from the assessment.</p>

	<p>imperative that all non-Green Belt sites in the development pipeline are properly considered.</p> <p>The sites identified in the development industry’s statement of common ground are units which ‘should’ be delivered, not ‘will’ be delivered – any discount should not be restricted to this figure.</p> <p>NSC should assess sites in part 1 of the published schedule which are in the development pipeline as well as those in part 2. The Inspector was clear that the majority of new sites should be deliverable within 5 years but that does not have to be the case for all sites – must be delivered by 2026.</p> <p>Comments on sites are as follows:</p> <p>Sites agreed as deliverable in 5 years: <u>Wilson Gardens/Scot Elm Drive</u>, <u>Harbour Road/Gordano Gate</u>, <u>Harbour Road/Serbert Way</u> (assuming C3 but if C2 use then the units would not count towards the housing requirement), <u>Site V2 Portishead</u>, <u>Waverley House</u>, <u>Wyndham Way</u>, south of <u>Cadbury Garden Centre</u>, <u>Co-housing Congresbury</u>, <u>Coombe Farm</u>, <u>Shipham Lane</u>, <u>South of Bristol Road</u>, <u>Cox’s Green</u>, <u>Barrow Hospital</u>, <u>Winford</u>.</p> <p>Plan period but not 5YS: <u>Dauncey’s Hotel</u> (lack of response from developer), <u>2-6 Bay Road</u> (currently operating as a residential and nursing home), <u>Queensway/Midhaven Rise</u> (will require pitch replacement).</p> <p>Contribution to 5YS: <u>Youngwood Lane</u>, <u>Old Mill Road</u>.</p> <p>Could be identified for development subject to a review of constraints and capacity: <u>26 Bristol Road Lower</u> (impact on conservation area, listed building and topography).</p> <p>Deliverability questioned: <u>Station Road St Georges</u> (no access, river crossing, acoustic issues, landscape issues, not being actively promoted), <u>Court Farm</u> (partly in Green Belt so should have been discounted and capacity questioned, not technically previously developed land as agricultural buildings, bats, access, flood, parking</p>	
--	--	--

		<p>issues), <u>Weston College</u> (ownership dispute), <u>F Sweeting and Son</u> (detached from settlement, not currently available, adjacent AONB, drainage, highway, pylon, watercourse contamination, archaeology, ecology, access, sustainability, viability, deliverability issues), <u>Broadleze Farm</u> (close to AONB and potential adverse impact, potential legal access issues, drainage constraints).</p> <p>Discounted: <u>West of M5</u> (major acoustic constraints, currently no means of access, no immediate prospect of delivery given existing development proposals to the north, conflict with J21a work, flood and ecological issues), <u>173 Kenn Road</u> (being considered for C2 use, in existing employment use so questionable delivery).</p>	
Persimmon Homes Severn Valley	General comments	<p>Two major flaws to the site assessments. Firstly, a number of sites in CD2a Part 2 list are more constrained and less likely to come forward than other sites in the development pipeline and omission sites. Secondly that is made worse by the very limited list of sites tested despite, identifying others in part 1 of the schedule having potential, which have not been assessed.</p> <p><u>Farleigh Fields, Backwell:</u> Site should be considered for allocation in the SAP similar to Cox's Green. Some sites in the assessment have no delivery profile.</p> <p>Two issues regarding interpretation of 'broadly consistent' with Core Strategy. 5 sites involve the loss of employment in conflict with CS20 and CS31 and the submitted SAP employment policies. These sites are considered acceptable even though they are not broadly consistent with the CS. This interpretation should be applied to other sites.</p> <p>The scale of provision proposed at Youngwood Lane is necessary to deliver Core Strategy housing numbers but the principle needs to be applied to other sites like Farleigh Fields.</p> <p>It is important that the same mistake is not made in overestimating supply as identified by Inspector. Delivery information received seems to have been accepted without question leading to unrealistic assumptions on a number of sites.</p>	<p>The process undertaken has sought to identify sites based on the three criteria outlined by the Inspector, with a key objective of identifying sites with potential to be delivered in the short term. The assessment process has sought to identify constraints that impact upon suitability and delivery and it is recognised that most sites will have some form of constraint which will need to be resolved. Often it is not always easy to ascertain the degree to which constraints might affect the timescale for delivery, however this will be a key factor in the assessment process.</p> <p>Farleigh Fields has not been assessed as it is currently awaiting its planning appeal decision. This is not the same as the Cox's Green site considered as this is a separate</p>

		<p>Part 2 list includes sites with C2 units and Park Homes - these have not previously been included in 5 year supply and should be discounted</p> <p><u>Moor Rd, Yatton:</u> One remaining constraint on this site is the replacement/relocation of rugby playing pitches which is subject to Sport England objection. This will need to be considered against the urgent need to boost the supply of housing and in light of the replacement provided by the rugby club themselves.</p> <p><u>Land to the west of Winterstoke Road:</u> Similar objection from SE on the loss of playing pitched on this site. Planning judgment required, similar site at Midhaven Rise considered.</p> <p><u>Phase 2 Winterstoke Village:</u> Resolution of this application is now urgent if delivery is to be maintained. One issue is the calculation of jobs to meet the requirements of the employment-led approach. Again planning judgment required.</p>	<p>smaller application which meets the criteria for assessment.</p> <p>The assessment whether a site is consistent with the Core Strategy framework was in relation to the spatial strategy. Other aspects such as the need for an appropriate balance of employment land will also need to be taken into account. The employment sites being considered are in the process because they are being put forward for residential development. As part of this process the Council will need to consider impact on economic objectives and the plan as a whole.</p> <p>Regarding delivery information, the Council has sought to work with the development industry but recognises that the assumptions used need to be tested.</p> <p>Other current Persimmon sites are referred to but these are not part of the assessment process.</p>
Walsingham Planning on behalf of Nailsea Holdings LVA	Overall approach to site assessments	<p>NSC has failed to test the potential for up to 2500 dwellings – the capacity of the 28 sites identified falls significantly short.</p> <p>Methodology is unsound – particularly the decision to limit the scope to sites in the development pipeline – this excludes sites which could be delivered in 5 years. Of the sites, at least 9 are FZ3a, 4 are allocated for other uses, 1 has environmental constraints and 2 have land ownership issues. Pause the process and undertake a more thorough assessment.</p>	<p>The site assessment process has been undertaken in accordance with the Inspector’s guidance. At the examination process the development industry emphasised the importance of sites being in the development pipeline. The site being promoted here is Green Belt at NE Nailsea.</p>

CPRE	Overall approach	Support a sequential approach which accords with Core Strategy. Continue to be concerned for 'ordinary countryside' particularly around service villages.	Support for approach welcomed.
Persimmon SW	General	Persimmon SW do not have any sites in North Somerset but have interests in North Devon. Need to ensure same approach and methodology is applied as at the North Devon examination. NSC should not be allowed to 'water down' the position.	We are dealing with the specific circumstances relating to North Somerset, applying the Inspector's guidance.
Comments on sites included in the assessment (some representations also make reference to sites not included in the assessment)			
Environment Agency	All sites	<p>There shall be no development within functional floodplain and sequential and exception tests required as appropriate. Need to avoid ground floor sleeping in FZ3a.</p> <p>Comments on sites:</p> <p>Site located in FZ3: 173 Clevedon, Broadleaze Farm, Co-housing project, Harbour Road/Serbert Way, Wyndham Way, Old Mill Road, Site V2, Waverley House.</p> <p>Barrow Hospital: Site at risk from breach of Barrow Reservoirs.</p> <p>F Sweeting and Son: May be appropriate if located outside floodplain.</p> <p>FZ3 and fluvial floodplain compensation required: Station Road St Georges, Wilson Gardens/Scot Elm Drive.</p> <p>Youngwood Lane: Low lying nature of the site may result in significant drainage issues.</p> <p>Winford: small area of FZ3 which could lead to access issues in the event of B3130 flooding.</p> <p>No comment: 2-6 Bay Road, 26 Bristol Road Lower, Coombe Farm, Court Farm, Dauncey's Hotel, Harbour Road/Gordano Gate, Cox's Green, Shipham Lane, South of Bristol Road, Cadbury Garden Centre, West of M5, Queensway/Midhaven Rise, Weston College Somerset Square.</p> <p>Biodiversity – the Winscombe sites have the potential to impact cumulatively on the AONB. Need to consider watercourse and habitat improvements. Cox's Green – potential for protected species in the watercourse. Waverley House – need to protect watercourse and habitat improvement. Old Mill Road – watercourse has potential for protected species, need for watercourse protection and habitat</p>	Detailed site related drainage, floodplain, and biodiversity issues will need to be addressed.

		improvement. Youngwood lane – potential to impact on Local Wildlife Sites.	
Walsingham Planning on behalf of St Congar Community Co-housing Limited	Co-housing project, Congresbury	Although there are legitimate heritage concerns proposals submitted as part of the pre application show that these can be overcome.	Heritage issues to be addressed through the planning application process but capacity is liable to be less than 10 units in which case it falls below the threshold for allocation.
Walsingham planning for Mead Realisations	Broadleaze Farm, Winscombe, land at St Georges and additional sites	<p>Disappointed that the Council have not undertaken the work requested by the Inspector. Reopening the discussion on the 2,500 is not within the scope of work requested by the Inspector. What is being tested by the Council falls significantly short of the 2,500 dwellings.</p> <p>In considering which sites to include in the assessment of additional supply, NSC should not have sought sites that meet all three criteria, but instead should have considered supply from each in turn. This is not a sound method for identifying allocations as there is no guarantee that the sites currently within the development pipeline are the most appropriate. It is unfair to exclude developers and landowners that have promoted their sites through the SAP but who have not yet applied for pre-application advice. No reason to conclude that these sites cannot deliver housing within the next 5 years or during the plan period. At least nine of the sites are within Flood Zone 3a. If the sites were not restricted to those in the development pipeline, then other sequentially preferable sites could have been assessed. Four sites are proposed for other uses in the SAP, and there is no evidence to justify alternative sites for these uses to be re-provided.</p> <p>Delivery rate for Youngwood Lane is unrealistically high. A considerable number of houses are now proposed for Nailsea and should be brought forward as part of a comprehensive plan for the area. Delivery of the proposed level of housing in Nailsea will result in additional traffic pressure on the local highway and may require strategic road improvement to mitigate the impact which has yet to be identified or planned for.</p>	<p>The Council disagrees that the Inspector has effectively identified a target of 2,500 dwellings. The instruction was to 'test the provision of additional housing sites for up to 2,500 homes within the SAP' within the parameters e.g. development pipeline. This cannot be equated to a need to allocate a minimum of 2,500 dwellings.</p> <p>The Inspector is clear at the hearings that it is not appropriate to open the process to a whole new suite of sites, that sites had to be in conformity with the adopted Core Strategy, and that they had to be in the development pipeline</p> <p>To be acceptable any provision for Youngwood Lane in the SAP would need to demonstrate how it can be masterplanned and delivered in association with the emerging JSP proposal. There will be a number of critical issues to address, including</p>

		<p>Mead Realisation sites: Welcome the inclusion of Land at St Georges and Broadleaze Farm, Winscombe, however would like to commend:</p> <ul style="list-style-type: none"> • Land off Ebdon Rd, (about 27 dwellings) • Land at Lynchmead Fard, Ebdon (up to 300 dwellings) • Land at Manor Farm, Worle (up to 90 dwellings) • Land at Homefarm, Kewstoke (630 dwellings) <p>These are sites previously submitted to the JSP Call for Sites. Recommend the Council pause and undertake a more thorough site assessment process.</p>	<p>infrastructure funding and delivery, transport, ecology and drainage. It is not appropriate to include new sites at this stage which do not conform with the criteria set out.</p>
Congresbury Parish Council	Sites at Wrington Lane, south of Cadbury Garden Centre and Sousta Taverna, Congresbury	<p>Land off Wrington Lane, Congresbury should not be on the list in view of the inspector's recent decision at appeal. Land south of Cadbury Garden Centre: the Parish Council agree that this is a sustainable site but still have concerns with regard to the highway access. Congresbury Neighbourhood Development Plan is at the stage of looking at possible sites and the Steering Group is considering adjacent land to this site for inclusion as it is also a sustainable site. Sousta Taverna: the Parish Council is aware that this site is not in compliance with CS32, however we believe that this site should be considered as it would make the residents living in Station Close less isolated and is a sustainable site for potential development.</p>	<p>The Wrington Lane site is an existing proposed allocation and has the benefit of planning consent despite the duplicate application being dismissed at appeal. The reserved matters will give the opportunity to address the landscape impacts further. The indication is that highway access issues can to be resolved for the site south of Cadbury Garden centre. The Sousta site did not meet the criteria for the site assessment process.</p>
Winscombe and Sandford PC	Coombe Farm and Shipham Lane, Winscombe and other sites	<p>Noted that Woodborough Road site had not been included even though it was subject to pre-application advice. It was thought that sites at Coombe Farm and Shipham Lane had previously been refused permission on appeal. It is noted that pre-application advice had been provided for Mooseheart site – this land would normally be afforded a high degree of protection against development of this kind.</p>	<p>Existing allocated sites were not included in the assessment process (Woodborough Road site) nor sites within the AONB as being contrary to the Core Strategy spatial strategy (Mooseheart). Previous planning history will highlight relevant issues to be taken into consideration.</p>
Hoddell Associates on behalf of Vowles	Shipham Lane and Coombe Farm, Winscombe	<p>Shipham Lane: Reference is made in the assessment to the fact that part of the site, as assessed by the Council, falls within the AONB. Vowles owns/controls the land within the site but excluding that which lies</p>	<p>It is recommended that this sites is allocated for residential development with the exception of a small parcel of land at Shipham</p>

Family/Vowles Parks Ltd		<p>inside the AONB. As such, Vowles is prepared and can bring forward its land for early development and considers that, by careful design and layout, no significant or material impacts would arise in respect of the AONB. As the assessment notes, Vowles also owns/controls Coombe Farm to the south together with the intervening land (identified in the HELAA 2014 under site ref HE 14256) which would permit, if required, access to be brought to this land.</p> <p>Coombe Farm: This site is compliant with Core Strategy policy, can be designed and developed sensitively to mitigate any potential impacts and can be brought forward by Vowles so as to deliver much needed housing within the next 5 years and so should now be duly allocated for housing.</p>	<p>Lane that lies within the AONB boundary. Highway issues can be dealt with via a planning application</p>
David James and Partners	Shipham Lane, Winscombe	<p>Part of the site lies within the AONB. It is considered that development of this small parcel of land with careful design and layout would not have an adverse impact on the AONB</p>	<p>This small parcel of land is totally within the AONB and its development would be contrary to national and local policy.</p>
Wrington PC	Cox's Green, Wrington	<p>NSC state that the list of sites 'does not revisit sites which have been refused or are awaiting an appeal decision', yet the site has an appeal hearing/decision awaited. It would be wrong for the NSC to consider the site prior to the forthcoming appeal hearing, as the issues are largely the same, irrespective of the number of houses. The site should be removed from the list to be considered by the Executive.</p> <p>Comments on Site Assessment: Site details: the industrial site is not 'relatively hidden'; flood risk: development will exacerbate this; also the 1st sentence should have addition: 'with the surrounding lanes obstructed by water in flood conditions'; archaeology: archaeological potential should be investigated; landscape: development will be highly visible from the AONB; the land has more than 'moderate character'; ecology/environmental: bats would be affected by lighting and removing or resiting of hedges, and rewording of section is suggested; transport and highways: re-wording suggested; site access: farm access is at a narrow point on a bend/hill brow; site/ area character: site is remote from village centre, outside settlement boundary, near</p>	<p>The proposal going to appeal is not included in the assessment, but the smaller application meets the criteria and has therefore been assessed. The smaller site has a less of a landscape impact and can be more readily assimilated subject to outstanding issues being resolved. The adopted Core Strategy defines Wrington as a service village and, subject to detailed issues being resolved, the site is recommended for inclusion.</p>

		<p>Green Belt, and there must be some impact on openness of Green Belt; ; topography: site is on a ridge and housing will be clearly visible;</p> <p>Planning policy: questionable whether Wrington can reasonably be classed as service village; proposal does not respect character of village; site exceeds limit of 25 dwellings;</p> <p>Summary of site suitability:</p> <p>Site availability: required footpath is affected by landownership issues; site achievability: viability constraints should cover a number of issues, there are constraints regarding access, sustainability, flooding; there are competing sites: same developer has application for 59 dwellings on site; status of development interest: question land ownership: owner is not currently Redcliffe Homes; flood risk: this has not been fully considered; local highway concerns: development will increase traffic leading to further congestion. Also the sustainability assessment is too generous regarding a number of factors.</p>	
GL Hearn on behalf of Redcliffe Homes	Cox's Green, Wrington	<p>The SAP identifies supply to deliver a maximum of 21,458 dwellings, just a 2% margin for error above the 20,985 and relies on almost 100% delivery, which is not supported by the evidence and persistent under supply in North Somerset. The council advocates the same approach as was adopted by the BANES Place making plan's Inspector, but each plan is different due to particular circumstances at the time in the specific area. Also the BANES Inspector did not examine 5 year land supply in detail.</p> <p>We have considered the options explored by the council in CD2a regarding scale of any contingency: we agree that option A is not appropriate; B is the most robust approach; C is not agreed - the deliverable supply identified by the development industry at the hearings does not represent a guaranteed supply and cannot be treated the same as completions; regarding D concerns raised about 5 year supply in some cases have implications for longer term supply, so it's not appropriate to limit calculations to the 5 year supply.</p> <p>The council has misinterpreted the Inspector's letter in only assessing sites currently in the development pipeline. All sites promoted</p>	The assessed site is recommended for inclusion. The larger site was not assessed as it is subject to appeal. The Council has followed the Inspector's guidance in respect of the methodology used and disagrees with the comments made about the scale of contingency which is required.

		<p>through the SAP, including those currently at appeal, should be assessed. As a result the council has failed to properly test all potential sites, in omitting to give further consideration to Part 1 sites.</p> <p>The Cox's Green site is not subject to any national or local designation, and has no designated historic assets close by which would be affected by development. Wrington is a service village appropriate for small scale development. The council has yet to determine the planning application for the site. We question the ratings of the site; (for example against a sub objective it should be green, not red as it is flood zone 1). The site is deliverable within 5 years. It should be identified in the identified supply.</p>	
Wrington Village Alliance (2 submissions)	Cox's Green, Wrington	<p>Comments on Site Assessment:</p> <p>Surrounding areas: the industrial site is not 'relatively hidden'; flood risk: development will exacerbate this; also the 1st sentence should have addition: 'with the surrounding lanes obstructed by water in flood conditions'; archaeology: archaeological potential should be investigated; landscape: development will conflict with the North Somerset Landscape Character Assessment, and comprise ribbon development visible from roads, PROWs, and the AoNB; it has more than 'moderate character'; ecology/environmental: bats would be affected by lighting and cat predation, and rewording of section is suggested; transport and highways: assessment does not factor in things like local conditions that may affect walking and cycling (topography, footways etc) and age and health of walkers/cyclists; (re-wording suggested); site access: farm access is at a narrow point on a bend/hill brow; agricultural land value: unknown; site/ area character: development will be out of character, site is remote from village centre, outside settlement boundary, near Green Belt, and there must be some impact on openness of Green Belt; topography: site is on a ridge and housing will be clearly visible.</p> <p>Planning policy: site can only be compatible with Core Strategy if it is sustainable, which it isn't; site exceeds limit of 25 dwellings;</p> <p>Summary of site suitability:</p>	Subject to detailed issues being resolved, the site is recommended for inclusion.

		<p>Site availability: required footpath is affected by landownership issues; site achievability: viability constraints should cover a number of issues, there are constraints regarding access, sustainability, flooding; status of development interest: agricultural grazing continues; flood risk: this has not been fully considered; local highway concerns: development will increase traffic leading to further congestion. Also the sustainability assessment is too generous regarding a number of factors.</p> <p>Note: this submission also includes objections from a number of businesses at, and the owner of, the Burnett industrial estate.</p>	
Individual	Cox's Green, Wrington	<p>Wrington resident. Primary school is over-subscribed. Difficult to get to Bristol and back for work since buses were cut. Have seen the site flooded. Site should not be considered for development.</p>	<p>Site is adjacent to the service village of Wrington and is a relatively sustainable location, although detailed site issues will need to be resolved.</p>
Individual	Cox's Green, Wrington	<p>Build on brownfield not greenfield sites. It is BMV agricultural land and outside the village boundary. Buzzards nest on the site. All roads that will service the site flood. Additional development will increase risk of flooding. No safe pedestrian access into the village or a safe route to build one. Infrastructure cannot cope with the amount of development in villages. Planning and appeal process is heavily weighted in favour of developers.</p>	<p>Site is adjacent to the service village of Wrington and is a relatively sustainable location, although detailed site issues will need to be resolved, including flooding. The larger site is subject to a planning appeal.</p>
Individual	Cox's Green, Wrington	<p>Strong objection to inclusion of site. Developers should be forced to actually build on land with permission, rather than bolstering housing numbers with new unsustainable locations. Preserve the countryside and look at locations with better transport links, no history of flooding etc. Agree with Wrington Village Alliance and WPC submissions. Wrington shouldn't even be classified as a service village.</p>	<p>Wrington is identified as a service village in the adopted Core Strategy and this site is, on balance, a sustainable location in principle.</p>
Individual	Cox's Green, Wrington	<p>Regarding the site assessment for the site: while the site is for 28 units, not 59, both proposals would need attenuation ponds so the housing density remains the same; development would increase flood risk and be out of keeping with existing character regarding landscape; the developer's ecology report showed high bat activity along hedgerows; concerns regarding road safety; the fields are grazed showing they have agricultural land value; concerned about</p>	<p>The site assessment is considered to be appropriate and there is a difference between the two proposals, particularly in terms of landscape impact - the smaller site is recommended for inclusion.</p>

		compatibility with existing uses (outside settlement boundary; proximity of business areas and HGVs); site availability: residents are unwilling to give their gardens for the footway into the village. Regarding the Suitability Assessment: this is too generous for the site regarding access to educational facilities, opportunities for people to work locally, reasonable access to town centre services, biodiversity protection, landscape protection, and reasonable access to sustainable transportation.	
Individual	Cox's Green, Wrington	Object to the assessment of the site and the number of 'green lights' it includes. The site is not suitable for development and should not be considered for inclusion in the SAP. Wrington should not be classified as a service village: there are serious flooding issues, a lack of buses. The government should force developers to develop the land they've already acquired.	The adopted Core Strategy defines Wrington as a service village and, subject to detailed issues being resolved, the site is recommended for inclusion.
Individual	Cox's Green, Wrington	The site is unsuitable for development with regard to issues of flooding, highways, and access to services and facilities (which should be categorised as red). Also this is a rural location and development would alter the character when entering the village from the A38, and be visible from the AoNB. The development would be part of a much larger application as it only takes part of the field.	Subject to detailed issues being resolved, the site is recommended for inclusion.
Individual	Cox's Green, Wrington	Object to the scoring used to assess the site. Primary school is full and includes temporary buildings – should be amber or red. Any employment opportunities are low paid which would not sustain a mortgage. Site is outside village, a distance many would find difficult on foot. Significant landscape impact – should be red. Technically outside FZ3 but regularly floods and roads are cut off. Buses are infrequent and don't support commuting. Highly unsustainable site.	Site is adjacent to the service village of Wrington and is a relatively sustainable location, although detailed site issues will need to be resolved, including flooding.
Pegasus Group on behalf of Anchor	Harbour Rd, Serbert Way, Portishead	Site is located within Portishead Town Centre and has had a previous consent for retail use. Site allocated for employment but no interest shown for employment use. Site is suitable for residential use. Pre – application submitted for 93 self-contained units for older people - not a care home as implied by the Sustainability Appraisal. Given shortage of housing land and lack of interest site should be allocated for residential development. Detailed comments on red/amber/green ratings in sustainability appraisal. Residential use compatible with	Given the lack of employment opportunities in the Portishead area there is a need to retain this available and deliverable site for employment.

		surrounding uses, proposed units for older people will not impact on education provision, flood mitigation is possible on site and proposed Portishead Railway Station should be factored into any assessment	
Portishead Town Council	Old Mill Road, Portishead	Object to the site being 'broadly in conformity with the Core Strategy framework'. The town cannot afford to lose any site with existing employment. Assessment refers to assess to station which doesn't exist yet. Education – not amber as children attending Portbury, secondary school is bursting at the seams. Site provides a breadth and depth of jobs at all levels – there is very little other land available. Other employment sites in Portishead being assessed do not have existing jobs. 350 dwellings would significantly impact on traffic, types of jobs on offer are low level, part time and poorly paid and inadequate compared to jobs which will be lost. Medical centres are overstretched. Site has considerable value to the town in terms of the economy and ongoing vibrancy.	Importance of the businesses to jobs in Portishead is recognised and site is not recommended as an additional housing allocation.
Fitness Hub South West	Old Mill Road, Portishead	No dwelling capacity has been attributed in response to local support for existing businesses and resistance to further residential development. Site should be designated for employment. The proposed delivery trajectory is unrealistic. Very limited potential to retain existing businesses in Portishead. Standard Life have refused to engage with existing tenant businesses.	Importance of the businesses to jobs in Portishead is recognised and site is not recommended as an additional housing allocation.
GR Planning on behalf of HHGL Ltd (Wyndham Way Retail Park)	Old Mill Road, Portishead	Standard Life confirmed that there was no intention to redevelop the retail park, but outstanding objection remains. Site is not available as Homebase has lease to September 2025. Need to assess implications on existing retail and commercial businesses.	The proposed mixed use site includes the Wyndham Way Retail Park, but Standard Life are not proposing it is part of any potential redevelopment. The site is not recommended as an additional housing allocation.
Aston & Co Ltd	Old Mill Road, Portishead	Delivery information should have included Land Registry titles, copies of option agreements. Developers are notoriously optimistic in forecasting delivery/supply rates. The assessment needs to be much broader to have any hope of improving 5YS. Need a strategic review working with the JSP and including a Green Belt review. Old Mill Road: provides much needed employment and its loss would create outward commuting pressure. Likely to be ground	It is considered that the delivery information requested was appropriate and recognise that proposed delivery rates may be optimistic when sites are being promoted. The Site Allocations Plan

		contamination issues. There is strong local opposition, site is located in FZ3a, it will increase congestion issues and employment use should be safeguarded. Delivery trajectory proposed is unrealistic. Rather than complete and endorse an outdated and inadequate SAP, need to focus on its replacement.	needs to be resolved before progressing the JSP/new Local Plan. The Old Mill Road site is not recommended as an additional housing allocation primarily given the importance of the businesses to jobs in Portishead and questions over its delivery.
T & G Woodware Ltd	Old Mill Road, Portishead	Town needs to retain manufacturing jobs and protect existing employment land. Standard Life are not offering quality jobs. Many will be part time and not skilled. No attempt by landowners to improve appearance of the site. Portishead is not a suitable sustainable location for more housing development given the pressure on existing facilities and poor transport links.	Importance of the businesses to jobs in Portishead is recognised and site is not recommended as an additional housing allocation.
Acorn Restorations Ltd	Old Mill Road, Portishead	Redevelopment of site will mean relocation. Of 7 employees in the business all are skilled with 5 living in Portishead. Currently there are approximately 274 employees on Old Mill Road.	Importance of the businesses to jobs in Portishead is recognised and site is not recommended as an additional housing allocation.
G L Hearn on behalf of Standard Life Investments	Old Mill Road, Portishead	Site can deliver 350 residential units as part of a comprehensive mixed use redevelopment No technical constraints to development. No justification or evidence supporting the stance that the development should ensure the relocation or integration of existing businesses. Development will provide new employment opportunities. Detailed comments provided on red/amber/green ratings in sustainability appraisal. Site is less than 1km from proposed Portishead Railway Station and flood risk can be avoided by locating 'less vulnerable' uses on the ground floor	Importance of the businesses to jobs in Portishead is recognised and site is not recommended as an additional housing allocation. The site is proposed for mixed use, but no specific housing number is included in the plan.
Portishead residents (seven similar responses)	Old Mill Road, Portishead	Objections to the red/amber/green ratings given to certain factors in particular the location of the nearest train station which although less than 5km away (as the crow flies) is difficult to get to and has a poor service. Portishead is not a suitable sustainable location for more housing development given the pressure on existing facilities and poor transport links. Town needs to retain manufacturing jobs and protect existing employment land.	Importance of the businesses to jobs in Portishead is recognised and site is not recommended as an additional housing allocation. The site is proposed for mixed use, but no specific housing number is included in the plan

NSC Councillor	Old Mill Road, Portishead	Until recently Portishead had a number of thriving businesses which have been lost. The return of the railway is welcomed, but its delivery is still not confirmed. In the meantime the bus and road network is inadequate. Developers do not understand the town. Too many restaurants, cafes and charity shops. Contributions to education will not pay for a school and existing shortage of school spaces will be aggravated. Lack of health facilities. There are offices and other small businesses in Portishead, but none offer the width of skills available in this area. There are 294 people working of which 177 are skilled. Designate site as industrial.	Importance of the businesses to jobs in Portishead is recognised and site is not recommended as an additional housing allocation. The site is proposed for mixed use, but no specific housing number is included in the plan.
NSC Councillor	Old Mill Road, Portishead	See no benefit to Portishead in ousting an established business site, especially with no available alternative employment sites. Does not fit with a 'jobs first before housing' approach. Proposed retail and bar jobs offer minimum wages and would require skilled workers to out-commute. Already under pressure from highways, education and GP services. Need for Standard Life to work with existing lessees.	Importance of the businesses to jobs in Portishead is recognised and site is not recommended as an additional housing allocation. The site is proposed for mixed use, but no specific housing number is included in the plan.
Nailsea Action Group	Youngwood Lane, and Weston College, Somerset Square, Nailsea	<u>Youngwood Lane</u> : The RAG outcomes can give a false impression of the reality of a situation and risks misleading those relying on it – this is particularly true of this site. NAG objects to its inclusion. Flood risk – site is adjacent to FZ3 and even if summer the lower lying areas are soggy, and in winter, under water. Persistent wetness likely to be due to accumulation of surface water. Landscape – will be highly visible, radically changing the character of this rural setting and outlook. Ecology/environmental – proposals to mitigate horseshoe bat habitat are unlikely to be sufficient. Sustainability assessment – health care is 2,150m away, double 1.2km median distance – green is misleading. Small range of shops by Holy Trinity Church is not a 'full range of facilities' – these are in the town centre. Access to schools should be no better than amber. Local employment opportunities should be red. Biodiversity in respect to protected habitats should be red. Air quality amber rating is generous – red would reflect local and wider situation better. In reality the length of walk to access appropriate bus services and their timings means this should be red. Distance to	To be acceptable any provision for Youngwood Lane in the SAP would need to demonstrate how it can be masterplanned and delivered without prejudice to the emerging JSP proposal. There will be a number of critical issues to address, including infrastructure funding and delivery, transport, ecology and drainage.

		<p>bus stop – amber would be fairer as it is between 400-600m. Site should not be allocated.</p> <p><u>Weston College, Somerset Square</u>: Very suitable site for development in a central location, and has been derelict for many years.</p>	
Individual	Youngwood Lane and Weston College, Somerset Square, Nailsea	<p>Youngwood Lane site would not meet requirements for sustainable development, existing infrastructure not sufficient for a development of this size. RAG ratings are too generous. Town centre, heath and community facilities are distant from the site, lack of employment, impact on heritage assets (Chelvey), ecology (bats), landscape, drainage, bus stop is more than 400m.</p> <p>Weston College, Somerset Square is supported – sustainable development maximising use of existing land.</p>	To be acceptable Youngwood Lane would need to demonstrate how it can be masterplanned and delivered without prejudice to the emerging JSP proposal. There will be a number of critical issues to address, including ecology, heritage and drainage issues.
Pegasus on behalf of Edward Ware Homes	Land south of Bristol Road, Churchill	<p>NSC assessment raises significant concern in relation to sites linked to strategic options e.g. Youngwood Lane, west of M5. Strategic (JSP) requirements are not yet fully defined and may never emerge. Existing junction operates within capacity. Disagree with assessment that site should not be allocated through the SAP due to strategic planning context. Pre-app did not discourage application based on potential conflict with JSP. The review was significantly constrained by the options it has assessed. As a consequence may have missed opportunities by taking a narrow view. Conclusions on connectivity of the site are not accurate. Surface water issues relate to land outside of the site and the development of the site would not exacerbate this. An appropriately designed drainage scheme can be designed. Developer ready to take site forward so it is deliverable.</p>	It is important to ensure that short term development proposed at strategic development locations emerging through the JSP do not prejudice an effective comprehensive future approach. In this case there is a need to demonstrate that the form of development will not compromise future strategic highway options. It is essential that a suitable drainage solution is designed and implemented as part of a planning application and consent.
Grassroots Planning	Land west of M5, Locking Parklands	<p>Consider that the provision of additional allocations has been made extremely complicated in the last round of hearings. A more simplistic approach could be taken to the provision. Council should reconsider number of sites to allocate as a minimum of 2,500. As part of preparation of masterplan for site, many of the constraints and concerns expressed in the site assessment have been addressed. Robust to consider that the site could deliver between 110-120 dwellings in the SAP. No archaeological impacts currently identified to preclude development. Consider that adequate mitigation and design</p>	The Council disagrees that the Inspector has effectively identified a target of 2,500 dwellings. The task is to ‘test the provision of additional housing sites for up to 2,500 homes within the SAP’ within set parameters. This cannot be equated to a need to allocate a minimum of 2,500 dwellings.

		<p>measures are sufficient to ensure no adverse impacts arise in respect to ecology.</p> <p>Potential conflict to J21a and wider strategic transport interventions is not an appropriate reason for refusal nor prevent the allocation of the site at the current time. JSP/JTP is material but not yet adopted, is at a very early stage of preparation, provides little indication of the exact location of any potential junction nor any tangible evidence that a junction is feasible and financially viable in this instance.</p> <p>It is not considered that development of the site would preclude a junction in the location (M5/A371).</p> <p>Noise: Working to produce a robust set of mitigations similar to those found on consented land to the north.</p> <p>Site achievability: No overriding constraints that would render delivery unachievable within 5 years.</p> <p>General: Concern that the SAP could be adopted without a 5YS in place, and that the allocations will not come to fruition at all in the current development plan period.</p> <p>Constraints can be mitigated against and Weston is the main settlement in North Somerset to accommodate residential development.</p>	<p>The JSP/JTS is an emerging document for the period 2016-2036 and a requirement for a new J21a has been identified to facilitate new growth and address strategic transport issues in a comprehensive way. Whilst the specific requirements of this are not yet defined nor would be expected to be at this stage, it is sound planning to seek to address transport and development at a strategic level and to ensure decisions and land allocations are part of a wider sustainable strategy rather than a short-term piecemeal approach. The site also has significant constraints and even setting aside the J21a issue, deliverability within the SAP plan period is uncertain.</p>
Additional sites (not currently included in the sites assessment)			
GVA on behalf of St Modwen	Additional sites - West of Kenn Road, Kenn (Clevedon) and Moss Land, Locking Parklands	<p>The two omission sites should be assessed within the process.</p> <p><u>Kenn Road:</u> Site is in development pipeline and deliverable within 5 years. Site is not deliverable for employment, and no sound evidence for retention for employment use. The business enquiries data submitted by NSC demonstrates the point that there is not sufficient demand to bring the site forward for employment development. The only way of securing employment on-site is as a mixed use scheme and the application proposals 3 acres of employment land. If concerned over loss of employment land, why include sites in existing employment use? Had a robust settlement boundary assessment taken place, this site would be adjacent or within the settlement boundary.</p> <p><u>Former Moss Land:</u></p>	<p>The Kenn Road site is not within or adjacent to Clevedon and therefore is not considered to be in accordance with the Core Strategy framework. It is retained as an employment allocation.</p> <p>The Moss Land was not in the development pipeline at the time of the Inspector's letter. It is also an extension to Weston Villages where concerns were expressed about delivery by the development industry at the examination.</p>

		<p>Site is in accordance with the Core Strategy. Site should not be discounted on the basis of Strategic Gap as the Inspector requested these designations be revisited. An EIA screening was submitted in July so site is in development pipeline.</p> <p>Consider these sites should be considered as part of the current assessment exercise.</p>	<p>Neither site met the criteria necessary to be part of the assessment process.</p>
<p>Barton Willmore on behalf of Gallagher Estates</p>	<p>Additional site – Pill Green</p>	<p>Outdated SAP and core Strategy has been overtaken by events. NSC should focus on the JSP process and provide homes closer to the urban area of Bristol. Need to widen sources of supply including the site at Pill Green in the Green Belt which could deliver a first phase within 5 years.</p>	<p>Site is in the Green Belt and doesn't meet the criteria for the assessment process.</p>
<p>Rocke Associates for Moor Park Ltd.</p>	<p>Additional site - Laneys Drove, Locking</p>	<p>Endorse the joint response provided on behalf of the development industry. Process has failed to identify sufficient sites as requested by the Inspector.</p> <p>Laneys Drove: Site was part of original list of sites submitted to hearing sessions, and then not included within the assessment of additional sites as contrary to Core Strategy framework. There has been no transparent process of selection and rejection of sites for further consideration. Note that some sites categorised as 'countryside' remote from any settlement are included in the sites for consideration, notwithstanding that their sustainability credentials are greatly inferior to Laneys Drove. NSC is urged to review its approach to the selection of sites for further assessment. Should at the very least include all non-Green Belt sites put forward as omission sites and that are well advanced in the planning process, including the Laneys Drove site.</p>	<p>The Council disagrees that the Inspector has effectively identified a target of 2,500 dwellings. The instruction was to 'test the provision of additional housing sites for up to 2,500 homes within the SAP' within the set parameters. This cannot be equated to a need to allocate a minimum of 2,500 dwellings.</p> <p>The original list of potential opportunities submitted during the hearings illustrated the extent of developer interest to assist with the discussion. The final list of sites was a more measured assessment taking account of the guidance set out in the Inspector's letter.</p> <p>Sites that have been considered in the countryside are previously developed sites. Laneys Drove is not consistent with the Core Strategy framework as it is not adjacent to a town or service village,</p>

			and is not previously developed land (for residential) and so does not form part of the assessment.
JLL on behalf of UTAS Claverham	Additional site - UTAS Claverham	Site is previously developed land and is included in the Claverham Neighbourhood Plan consultation draft as a proposed residential-led allocation. Can be developed within 5 years for 80-100 dwellings. Also field to the north should be considered for residential allocation for 40-60 dwellings.	Site did not accord with the criteria used for the assessment as it was not in the development pipeline.
Walsingham Planning on behalf of Richards Developments	Additional site - Land behind Sousta Taverna, Congresbury	Many of the sites reassessed by the Council have deliverability problems. This site is in a sustainable location, a third of it is previously developed land, there are no technical constraints to development and the site can be developed within the next 5 years.	It is a predominantly greenfield site and not adjacent to settlement boundary. The site was therefore not included as part of the assessment process.
Pegasus Group on behalf of Strongvox Homes	Additional site - Land west of Wolvershill Road, Banwell	Site is in a sustainable location and has no impact on the landscape, heritage or archaeology interests. Recent appeal has demonstrated that highway impact can be accommodated.	As at the date of the Inspector's letter the site was not in the development pipeline. The site was therefore not been included in the assessment in accordance with the Inspector's advice.
Walsingham Planning	Additional site - South of William Daw Close, Banwell	Many of the sites reassessed by the Council have deliverability problems. This site is adjacent to Banwell's settlement boundary, there are no technical constraints to development and the site can be developed within the next 5 years.	As at the date of the Inspector's letter the site was not in the development pipeline. The site was therefore not been included in the assessment in accordance with the Inspector's advice.
Landowner	Additional site - Rectory Farm, Yatton	Site is in a sustainable location and outside of flood plain. Has no impact on landscape, heritage or archaeology interests. Site was originally omitted from the list of sites to be assessed.	As at the date of the Inspector's letter the site was not in the development pipeline. The site was therefore not been included in the assessment in accordance with the Inspector's advice.
Walsingham Planning	Land north of Greenhill Road, Sandford	Many of the sites reassessed by the Council have deliverability problems. This site is adjacent to the Sandford settlement boundary, is in a sustainable location, there are no technical constraints to development and the site can be developed within the next 5 years.	Sandford is an infill village subject to Core Strategy Policy CS33. Although the site is subject to a planning application for 93 dwellings the

			proposal is not compliant with the Core Strategy and therefore the site has not been included in the assessment.
Sutherland Property and Legal Services Ltd	Land to west of Bridge Road, Bleadon	Development of this site can deliver a local school and much needed housing.	Bleadon is an infill village subject to Core Strategy Policy CS33. The proposal is not compliant with the Core Strategy and therefore the site has not formed part of the assessment. In addition the site is not in the development pipeline.
Pegasus Group on behalf of Strongvox Homes	Additional site - Land east of Brinsea Road, Congresbury	Site is currently subject to an appeal. Site is similar to the site north of Venus Street which is proposed for allocation. Originally that site was not proposed for allocation by officers, but members resolved to allocate it despite the fact an application was pending. Site is in conformity with Core Strategy. Policy CS14 wording implies residential allocations at Service Villages are possible within or outside the settlement boundary. The site is adjacent to the settlement boundary. The 2014 HELAA concluded the site has the potential for housing. The site was reassessed by the council prior to the Publication SAP, and considered unsuitable for allocation on grounds of adverse landscape impact and poorly located. We consider this to be flawed, as the site is no further from facilities than sites granted consent or allocated, like the Venus Street site. Also it is not within a sensitive landscape location. It is not in the AoNB or Green Belt, not subject to a land use designation and not near any heritage assets. Site is available and deliverable within next 5 years. Council should undertake a more thorough and comprehensive review of available land for housing. The Council's selection and re-assessment process is fundamentally flawed; it has missed opportunities to consider potentially suitable sites and will fall significantly short in efforts to allocate up to 2,500 houses.	The site was not part of the assessment process as the decision on this site was taken and the appeal is due to be heard.
Pegasus Group on behalf of	Additional site - South of Langford	Site is available and deliverable within next 5 years. It is not in the AoNB or Green Belt, not subject to a land use designation and not near any heritage assets. Site would complement other sites in	Site is contrary to the Core Strategy framework and is not in the development pipeline and therefore

Edward Ware Homes		client's ownership at Churchill, such as land at Says Lane, granted planning consent. While the site is closer to the AONB boundary a landscape assessment of the site is to be undertaken. Council should undertake a more thorough assessment and review of opportunities in and around its most sustainable settlements.	does not form part of the assessment.
Turley on behalf of Taylor Wimpey	Additional site - Stowey Road, Yatton	Object to Council's approach raising concerns about the 2,500 dwellings figure and its relevance. The Inspector's letter does not invite further discussion on calculation of the additional housing allowance. The council has not assessed those omission sites which are in accordance with the Core Strategy simply on the basis that they are not currently in the development management system. That is contrary to paragraph 24 of the Inspector's letter. The arbitrary cut off point at which sites were assessed as being part of the development management system has constrained the potential assessment of sustainable sites, such as our client's site at Stowey Road Yatton. That was identified as a Part 1 site but has not been taken forward for further selection simply because it is currently at appeal, which is inappropriate. The reason was also given that at the time there was a 5 year supply, but that is no longer the case. The site is deliverable within 5 years (evidence has been provided). Some of the sites which have been subject to further assessment (Part 2 sites) are unable to confirm deliverability. The site should be considered as an allocation and sufficient sites to accommodate the 2,500 dwellings should be properly tested.	The site was not part of the assessment process as the decision on this site was taken and the appeal is due to be heard.
Pegasus on behalf of owners of land at Plummers Hill, Easton in Gordano	Additional site - Plummers Hill, Easton in Gordano	The land falls within cell 77a of the WoE Stage 2 Green Belt Assessment and has been assessed by the authorities regarding the five Green Belt purposes as having a limited contribution against four of them and no contribution against the fifth. Hence the Green Belt Assessment does not rate the Green Belt in this location very highly. The site can sustainably address the immediate issues identified by the Inspector in ID/4, and address housing needs longer term to 2036.	The site is Green Belt, contrary to the Core Strategy framework and is not in the development pipeline so site does not form part of the assessment.
Pegasus on behalf of owners of land at Highridge	Additional site - Land at Highridge, (Dundry Parish)	The land falls within cell 59b of the WoE Stage 2 Green Belt Assessment and has been assessed by the authorities regarding the five Green Belt purposes as having a limited contribution against three of them and no contribution against two. Hence the Green Belt	The site is Green Belt, contrary to the Core Strategy framework and is not in the development pipeline so

		Assessment does not rate the Green Belt in this location very highly. The site can sustainably address the immediate issues identified by the Inspector in ID/4, and address housing needs longer term to 2036.	site does not form part of the assessment.
Bleadon PC	Additional site - Land off Bridgwater Road and land off Purn Way, Bleadon	It is noted that these sites are in Part 1. The Parish Council has made previous objections to the 70 dwellings at Bridgwater Road and the planning application for up to 16 dwellings at Purn Way.	Sites in part 1 do not form part of the assessment.