



North Somerset Local Plan 2038

Spatial strategy and capacity

February 2022



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Introduction

1. This paper describes the spatial strategy, sequential approach and methodology used in assessing the potential deliverable housing capacity set out in the Preferred Options over the plan period 2023-2038.
2. The local plan must be prepared with the objective of contributing to the achievement of sustainable development. How sustainable development is delivered in North Somerset will reflect local strategic priorities, taking account of government guidance.
3. The Local Plan's strategic priorities were discussed through the Challenges for the future and Choices for the future consultations undertaken in 2020 and confirmed at Executive in April 2021:
 - *To promote sustainable development and address the climate emergency.*
 - *To deliver the zero carbon ambition by maximising the opportunities for low carbon development and the use of renewable energy.*
 - *To develop new and existing communities in a way which enhances health and wellbeing, reduces inequalities and is child and family friendly.*
 - *To increase the number and range of job opportunities across the district, particularly at the towns to give people the opportunity to work near to where they live.*
 - *To prioritise the location of new development close to places with a wide range of services, facilities and job opportunities.*
 - *To address the decline in the town centres of Weston-super-Mare, Clevedon, Nailsea and Portishead through supporting regeneration and place-making initiatives which revitalise these places as the focus for retailing, community uses, housing and jobs.*
 - *To reduce car use, encourage walking and cycling, and high quality and effective public transport.*
 - *To deliver a diverse range of housing in a variety of tenures, sizes and forms, particularly genuine affordable housing, to meet future needs of North Somerset residents at locations where they are most needed.*
 - *To deliver essential new strategic transport infrastructure to support new development and enable more sustainable travel options.*
 - *To deliver residential densities through good design, particularly at town centres, transport hubs and on brownfield sites.*

- To provide essential infrastructure in step with development, both transport infrastructure and community infrastructure such as schools, healthcare facilities and community centres.
- To prioritise the importance and delivery of green spaces when considering new development, support priority habitats and species and safeguard areas at risk of flooding.

4. Executive Committee considered the proposed vision and strategic priorities and endorsed the following spatial strategy for the emerging local plan:

Priority will be given to locating new residential and mixed use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel, particularly at locations which are currently, or have the potential to be, well served by public transport. Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised. Residential development in areas at risk of flooding will be minimised outside the towns. The amount of development at villages and in the countryside will relate to local community needs.

5. The Executive report identified a sequential approach which reflected government advice as a framework to identify and assess the broad locations for growth and which is summarised in the following table. This paper describes how this methodology was used as the basis for assessing development proposals and how the conclusions helped to shape the pattern of locations identified in the Preferred Options.

The sequential approach

Step 1: Existing planning permissions
Step 2: Urban capacity
Step 3: Town expansion
Step 4: Other sustainable settlements
Step 5: Rural areas
Step 6: Other opportunities
Step 7: Green Belt

6. Local plans and spatial development strategies should be informed by a sustainability appraisal. The spatial strategy, emerging policies and sites have been assessed against the SA objectives and the outcomes used to inform the Preferred Options.
7. This paper is set out in two parts. The first part relates to the assessment of opportunities to deliver sustainable development outside the Green Belt. This reflects government guidance which states (NPPF paragraph 141) that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries that all other reasonable options for meeting the identified need for development have been examined fully. This includes maximising the use of suitable brownfield and underutilised land, optimising density and informed by discussions with neighbouring authorities through the duty to co-operate.
8. As the plan-making process concluded that after considering all reasonable alternatives outside the Green Belt that there remains a potential shortfall in relation to the housing requirement, the second part considers opportunities in the Green Belt.
9. Combining the potential opportunities both within and outside the Green Belt informs the overall conclusion as to the deliverable capacity at sustainable locations over the plan period. This will be tested through engagement with communities, businesses and stakeholders through consultation on the draft plan.
10. This is still an early stage in the Local Plan and all locations and sites referred to in the Preferred Options will be subject to further refinement and testing as the plan-making process evolves and their inclusion does not imply that planning permission would be granted should an application be submitted.

Housing requirement

11. The government provides a housing need figure for North Somerset as part of its objective of significantly boosting the supply of homes. This is the starting point for the local plan and the expectation is that this is a minimum. The current standard method housing requirement for North Somerset is 1,339 dwellings per year or 20,085 dwellings over the plan period. This figure is adjusted each year in the light of changing affordability ratios.
12. The Local Plan must identify a sufficient supply and mix of sites, taking account of their availability, suitability and likely economic viability. This will need to identify a supply of specific, deliverable sites for the first five years, specific, developable sites or broad locations for growth for years 6-10 and, where possible for years 11-15 of the plan. The Preferred Options consultation will help to inform the proposed housing trajectory and to ensure that an appropriate mix of site opportunities has been identified.

13. The Local Plan will establish a housing requirement figure which shows the extent to which the identified housing need as calculated using the government's standard method can be met over the plan period. This will reflect deliverable capacity within North Somerset and discussions with neighbouring authorities about unmet needs and delivery issues such as a sufficient supply of immediately deliverable sites and the need to include an element of flexibility and choice.

Part 1: Outside the Green Belt

14. The starting point, reflecting government advice, is to consider all potential opportunities for delivering sustainable growth outside the Green Belt and compare the overall potential deliverable capacity to the housing need. This involves testing the proposed spatial strategy which reflects the identified strategic priorities and sustainability objectives and assessing capacity through a set of sequential steps.

Step 1: Existing planning permissions

15. The Local Plan period covers 15 years 2023–2038. This overlaps with the extant development plan which runs to 2026 and includes allocations with permissions which are anticipated to be completed before 2038.

16. The Residential Land Survey and housing trajectory is updated annually. This identifies sites and when they are expected to be delivered. This document has been updated to an April 2021 base and identifies the number of dwellings from sites with existing planning permission expected to be delivered between now and 2038.

17. At April 2021 7,417 dwellings are anticipated from this source. The bulk of this (4,882 dwellings) is made up of later phases of development on the strategic Weston Villages sites.

Step	Area category	Site location	Total capacity
1 - Existing planning permissions	Weston-super-Mare	Parklands Village	3,330
1 - Existing planning permissions	Weston-super-Mare	Winterstoke Village	1,552
1 - Existing planning permissions	Weston-super-Mare	Westacres Caravan Park	125
1 - Existing planning permissions	Weston-super-Mare	Land north of Oldmixon Road	119
1 - Existing planning permissions	Weston-super-Mare	Land west of Trenchard Road	75
1 - Existing planning permissions	Weston-super-Mare	Land at Bridgwater Road	60
1 - Existing planning permissions	Weston-super-Mare	Scot Elm Drive	57

1 - Existing planning permissions	Sandford	F Sweeting and Son site	16
1 - Existing planning permissions	Winscombe	Woodborough Farm	145
1 - Existing planning permissions	Other settlements	Barrow Hospital (1), Barrow Gurney	66
1 - Existing planning permissions	Other settlements	Barrow Hospital (2), Barrow Gurney	14
1 - Existing planning permissions	Other settlements	Unit C, Estune Business Park, Long Ashton	24
1 - Existing planning permissions	Other settlements	Unit A, Estune Business Park, Long Ashton	18
1 - Existing planning permissions	Other settlements	Tickenham Garden Centre, Tickenham	32
1 - Existing planning permissions	Other settlements	Golden Acres Fruit Farm, Tickenham	18
1 - Existing planning permissions	Other settlements	Land at Cox's Green, Wrington	45
Step 1 - Existing planning permissions - total			7,417

18. This figure will be kept under review in case sites deliver more quickly than anticipated or become delayed. As these sites are already consented no further assessment of them is required. The housing trajectory can be viewed at www.n-somerset.gov.uk/residentialland. As the plan-making process progresses the table will be updated to delete sites which have been developed and add in any new consents.

Step 2: Urban capacity

19. Government advice emphasises the importance of making effective use of land and the need to set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or 'brownfield land' (NPPF paragraph 119). This is an important element in the overall approach to achieving sustainable development.
20. The importance of maximising the use of previously developed and under-used land is also a key element of the Local Plan's strategic priorities and supports the objective of locating development close to a wide range of services, facilities and jobs to encourage active travel and support effective public transport.
21. The urban capacity assessment considers the potential opportunities likely to be delivered over the plan period within the four towns of Weston-super-Mare, Clevedon, Nailsea and Portishead. An assessment of sites has been undertaken and is presented in detail in the Urban Intensification study which is available to view at www.n-somerset.gov.uk/localplanevidence.
22. It is currently anticipated that (in addition to any which already have planning permission) suitable, available, achievable sites exist within the settlement boundaries of the four towns to deliver around 1,958 dwellings. This package of sites will be subject to further assessment and refinement of detailed densities and capacities.

3 - Town expansion	Wider Weston-super-Mare area	Elm Grove Nursery, Locking	50
Step 3 - Town Expansion - total			4,052

32. No additional potential for town expansion was identified at either Portishead or Clevedon outside the Green Belt. In the case of Portishead, it is tightly bounded by Green Belt. Clevedon is constrained by Green Belt to the north and east of the settlement boundary and areas at risk of flooding to the south and east.
33. Subject to further testing, urban expansion outside the Green Belt could deliver around 2,800 dwellings at the strategic location at Wolverhill (north of Banwell) linked to the delivery of the Banwell Bypass, and around 1,100 dwellings at Nailsea. There is also potential for new employment provision well-related to Weston-super-Mare, as part of the proposed strategic growth location.
34. It must be emphasised that at this stage in the sequential approach the assessment does not consider sites in the Green Belt. If exceptional circumstances are identified to enable consideration of Green Belt opportunities, then that will be taken into account at step 7.

Step 4: Other sustainable settlements

35. The next stage of the sequential approach is to consider whether, outside the Green Belt, there are any other settlements which are relatively more sustainable and therefore could be considered for a proportionate amount of growth. These would be expected to be:
- Larger villages with a wider range of services, facilities and jobs.
 - Opportunities for easy access to effective public transport such as a rail station or a high frequency bus route between urban centres.
36. The evidence indicates that there are two villages which fall into this category: Yatton and Backwell.
- Yatton is the largest village in North Somerset and has a supermarket, a relatively good range of shops and services meeting most day to day needs and employment opportunities. It has a main line rail station giving access to Weston and Bristol and is close to the A370 bus corridor. Claverham is also considered given its relationship to Yatton.
 - Backwell is a large village with a smaller range of shops and facilities, but it does have a secondary school and leisure centre and is adjacent to Nailsea with its higher order facilities. It has a main line station and is on the A370 bus corridor. There is potential to improve bus access from

Backwell to Bristol.

37. There are not considered to be any other villages outside the Green Belt which have the same opportunities to encourage active travel and the opportunity to access quality public transport.
38. The SHLAA assessment has identified the following opportunities taking account of primary and secondary constraints, the spatial strategy and strategic priorities. The Yatton Rugby Club/Moor Road site is a combination of an existing allocation which has been reviewed and a new site.

Step	Area Category	Site location	Total capacity
4 - Other sustainable settlements	Backwell	Grove Farm	600
4 - Other sustainable settlements	Yatton/Claverham	Yatton Rugby Club/Moor Road, Yatton	160
Step 4 - Other sustainable settlements - total			760

Step 5: Rural areas

39. The new Local Plan proposes that to deliver an overall pattern of sustainable development the priority should be to focus on the towns and locate strategic development where there is good access by walking and cycling to a wide range of services, facilities and jobs and good public transport opportunities. Growth at the villages and rural areas is relatively less sustainable and infrastructure provision is less effective. Therefore, growth at villages should be proportionate and limited to addressing local community needs and focussed at the relatively more sustainable villages. The amount of growth anticipated by the Preferred Options to be delivered in the rural areas over the plan period is anticipated to be around 10% of the total housing requirement; a scale of growth which accords with the objectives to deliver a sustainable pattern of development taking account of climate change commitments and the plan's strategic priorities and spatial strategy.
40. Local community needs could be based on a number of factors such as the demographics of the village population, the need for a particular type or tenure of housing, the need to support or sustain existing services such as schools, and the opportunity to deliver local benefits such as new facilities.
41. When considering development in the rural areas it is important to identify the relatively more sustainable settlements where any appropriate additional housing allocations should be directed. In terms of the sequential approach, this requires the identification of the relatively most sustainable villages outside the Green Belt when taking account of constraints and excluding those places being assessed separately through the spatial strategy sequential approach (such as Yatton, Backwell, Locking, Hutton). The identified villages are Banwell, Bleadon, Churchill (Langford), Congresbury, Sandford, Winscombe and Wrington. Potential opportunities are then considered through the SHLAA process.

42. The table below indicates the potential allocations at the seven villages identified at this stage of the sequential approach. This includes existing allocations reviewed and carried forward and new sites. There will also be rural windfall which is currently calculated to be around 61 dwellings per year or 915 dwellings over the plan period if current trends are extrapolated. This is expected to continue particularly as the number of villages with settlement boundaries will increase and existing boundaries will be reviewed which is likely to allow additional development opportunities.

Step	Area Category	Site location	Total capacity
5 - Rural areas	Bleadon	Land off Purn Way	14
5 - Rural areas	Churchill	Land east of Ladymead Lane	70
5 - Rural areas	Churchill	Land north of Pudding Pie Lane	65
5 - Rural areas	Churchill	Land south of Jubilee Lane, Churchill	21
5 - Rural areas	Congresbury	Pineapple Farm	90
5 - Rural areas	Congresbury	Woodhill Nurseries	60
5 - Rural areas	Congresbury	Land south of Station Road adjoining Church Farm	20
5 - Rural areas	Congresbury	Land to the north of Bristol Road	20
5 - Rural areas	Sandford	Land at Mead Farm	30
5 - Rural areas	Sandford	Land west of Sandford	18
5 - Rural areas	Winscombe	Broadleaze Farm	74
5 - Rural areas	Winscombe	West of Hill Road	30
5 - Rural areas	Winscombe	Land at Shipham Lane	28
5 - Rural areas	Winscombe	Land at Coombe Farm	24
Step 5 - Rural areas - total			564

Step 6: Other opportunities

43. Having assessed the potential development opportunities outside the Green Belt in the light of the spatial strategy and strategic priorities, the total capacity is estimated to be around 14,751 dwellings, some 5,334 less than the housing requirement.

44. NPPF paragraph 141 states that before concluding that exceptional circumstances exist to justify Green Belt changes, it must be demonstrated that all reasonable options for meeting the identified need have been examined fully and whether the strategy maximises the use of previously developed and under used land, optimises density and is informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need.

45. The opportunities to maximise the use of previously developed land and under used land have been assessed through the urban capacity work in step 2, particularly regeneration opportunities such as at Weston-super-Mare and Portishead. There may be some rural brownfield sites but these will need to be assessed in relation to sustainability criteria and any contribution from this source

is likely to be small. No additional significant sites have been identified through the evidence.

46. The urban capacity work also examined the potential for optimising densities, particularly at highly assessable locations such as local centres and transport hubs. The same principles are applied to the potential new development opportunities through the SHLAA assessment of sites.
47. A significant source of potential supply are sites well related to urban areas but which are located in flood zone 2/3a. These include strategic sites (outside the Green Belt) such as at Weston and Clevedon.
48. The NPPF is clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)' (paragraph 159). Plans should apply a sequential, risk-based approach to the location of development with the aim of steering development to areas with a lower risk of flooding. If, as in North Somerset, it is not possible to locate development elsewhere, government advice is that the exception test may need to be applied. This has two elements; the development must provide wider sustainability benefits to the community that outweigh the flood risk and the development will be safe for its lifetime without increasing flood risk elsewhere. Given the importance of addressing climate change, and the location of these new development areas, the sustainability benefits do not outweigh the flood risk.
49. Other potential opportunities to deliver additional growth outside the Green Belt include the development of new or expanded villages such as Mendip Spring or more growth at villages. This approach is very likely to lead to unsustainable patterns of development and encourage journeys by car, contrary to national guidance and the local plan strategic priorities.
50. The clear conclusion is that North Somerset does not have the potential capacity in sustainable locations to address the housing need and that there is a shortfall of some 5,334 dwellings. This triggers the need to clarify the position with neighbouring authorities as to whether they could accommodate some of the identified need for development.
51. In October 2021, as part of the duty to co-operate discussions, North Somerset Council formally requested neighbouring authorities to confirm whether or not they could accommodate some of the identified need for development within their areas to meet the requirement as set out in NPPF paragraph 141. The responses received were negative and these are set out in the duty to co-operate statement of common ground.

Overall capacity outside the Green Belt

52. After applying the methodology, the following table summarises the potential dwelling capacity identified outside the Green Belt. The total identified outside the Green Belt is 14,751 dwellings.

Step 1: Planning permissions	7,417
Step 2: Urban capacity	1,958
Step 3: Town expansion	4,052
Step 4: Other sustainable settlements	760
Step 5: Rural areas	564
Step 6: Other opportunities	0
Total outside the Green Belt	14,751
North Somerset housing requirement	20,085
Shortfall	5,334

The table does not include windfall as this is a less certain source of supply. Small site windfall is anticipated to be 176 dwellings per year district-wide, or 2,640 dwellings over the plan period.

53. The conclusion is that the government's housing requirement for North Somerset cannot be identified at sustainable, deliverable locations outside the Green Belt and that therefore the Council needs to consider Green Belt opportunities.

Green Belt

54. National advice emphasises that the government attaches great importance to Green Belts and that once established, boundaries should only be altered where exceptional circumstances are fully evidenced and justified, and through the plan-making process. NPPF paragraph 141 states that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting the need for development'.

55. The overarching exceptional circumstance for considering the opportunities for development in the Green Belt is that there is not sufficient capacity at sustainable, deliverable locations or from other sources of supply outside the

Green Belt to meet the North Somerset housing requirement. This conclusion has been reached after considering all potential opportunities as demonstrated in this paper, including maximising brownfield and previously developed land, optimising densities and discussing opportunities with neighbouring authorities as required by NPPF paragraph 141. There will also be specific exceptional circumstances relating to the locations proposed to be removed from the Green Belt.

56. Development opportunities in the Green Belt must demonstrate how they accord with the North Somerset spatial strategy in terms of being well-related to the towns in terms of maximising the opportunities for active travel to a wide range of facilities, services and jobs, and good quality public transport, and minimising development on land at risk of flooding. Exceptional circumstances for use of Green Belt places an emphasis on highly sustainable locations well served by public transport and where they cause least harm to Green Belt purposes.
57. The methodology identifies four broad locations which include Green Belt within which development opportunities are assessed. These are Nailsea/Backwell, Clevedon, Portishead and edge of Bristol.
58. North Somerset has undertaken a strategic assessment of the Green Belt (April 2021) and a detailed assessment of the broad locations and potential development parcels (January 2022). This has helped inform the selection of proposed development locations within the Green Belt.
59. The broad locations assessment, taking account of the Green Belt appraisal and sustainability appraisal has identified proposed strategic growth location at Yanley Lane (Woodspring golf course) for mixed use development including up to 2,500 dwellings, and other sites at Colliter's Way (215 dwellings), Clevedon Road, Portishead (80 dwellings) and east of Backwell (500 dwellings). These sites are well-related to the built-up areas of Bristol, Portishead and Nailsea/Backwell and therefore support the spatial strategy.
60. The specific exceptional circumstances which relate to the changes to the Green Belt in relation to these sites are as follows:

East of Backwell

- Lack of sufficient capacity at sustainable locations outside the Green Belt within North Somerset.
- Well served by public transport close to the rail station frequent bus corridor on A370 to Bristol.
- Location would support delivery of improved transport access to Nailsea in the form of a rail crossing.
- Good access to a wide range of facilities and services in Nailsea and opportunity to encourage active travel.

Clevedon Road, Portishead

- Lack of sufficient capacity at sustainable locations outside the Green Belt within North Somerset.
- Good access to a wide range of facilities and services within Portishead and opportunity to encourage active travel.
- Well located in relation to public transport access into Portishead (and future rail station),
- Minimal impact on the purposes the Green Belt

Yanley Lane (Woodspring Golf course)

- Lack of sufficient capacity at sustainable locations outside the Green Belt within North Somerset.
- Adjacent to A38 and potential to be extremely well served by high quality public transport into Bristol with Metrobus extension and on a mass transit corridor.
- Well located in terms of opportunities to encourage cycling into Bristol to access services, facilities and jobs.

Land North of Colliter's Way

- Lack of sufficient capacity at sustainable locations outside the Green Belt within North Somerset.
- Potential to be extremely well served by high quality public transport into Bristol with Metrobus extension and on a mass transit corridor.
- Well located in terms of opportunities to encourage cycling into Bristol to access services, facilities and jobs.
- Minimal impact on the purposes the Green Belt as it abuts the built up area and is contained by the road.

61. This step focusses on the highly sustainable locations well related to the towns and the edge of Bristol. It is inappropriate to consider village locations in the Green Belt for growth as exceptional circumstances do not apply. There are development pressures at places such as Pill/Easton-in-Gordano and Failand, but the importance of Green Belt means that sequentially it is preferable to identify growth at non-Green Belt villages if additional capacity is required. There may be some limited additional windfall capacity as a result of the review of village settlement boundaries and the creation of Green Belt insets, but this will be very small.

62. The additional capacity identified in the Green Belt is 3,295 dwellings as shown in the table below.

Step	Area Category	Site location	Total capacity
7 - Green Belt locations	Backwell	Land east of Backwell	500
7 - Green Belt locations	Portishead	Land south of Clevedon Road	80
7 - Green Belt locations	Other	Yanley Lane (Woodspring Golf Course)	2,500
7 - Green Belt locations	Other	Land north of Colliters Way	215
Step 7 - Green Belt locations - total			3,295

63. When added to the capacity identified outside the Green Belt, this brings the total to 18,046 dwellings.

Capacity outside Green Belt	14,751
Step 7: Green Belt locations	3,295
Total capacity identified (excluding windfall)	18,046 dwellings

Conclusions

64. The identified capacity of 18,046 dwellings represents some 90% of the North Somerset housing requirement. This leaves a shortfall when assessed against the housing requirement of 20,085 dwellings. While delivery from windfall over the plan period is anticipated to be around 2,640 dwellings, supply from this source is less certain and is not included as part of the housing requirement at this stage in the process.

65. Consultation of the Preferred Options will enable feedback to be provided on the housing shortfall and how this might be addressed, including the role of windfall.

66. As plan making progresses the Council will further investigate potential sites in terms of to the housing trajectory and when development is anticipated to take place. This will ensure a continuous supply of sites as well as highlighting issues related to the delivery of supporting infrastructure.

67. Two tables are presented which summarise the anticipated housing capacity in relation to the steps set out in the methodology, and by area.

Overall assessment of capacity by area

Step	Locations	Dwellings	Totals
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Step 1 - Existing permissions	Weston-super-Mare	5576	7417
	Clevedon	73	
	Nailsea	651	
	Portishead	119	
	Backwell	20	
	Yatton/Claverham	231	
	Villages and other locations	747	
Step 2 - Urban Intensification	Weston-super-Mare	1404	1958
	Clevedon	153	
	Nailsea	28	
	Portishead	373	
Step 3 - Town expansion	Weston-super-Mare	2950	4052
	Nailsea	1102	
Step 4 - Other sustainable locations	Backwell	600	760
	Yatton/Claverham	160	
Step 5 - Rural areas	Villages and other locations	564	564
Step 6 - Other opportunities	None	0	0
Step 7 - Green Belt	Backwell	500	3295
	Portishead	80	
	Other areas	2715	
TOTAL			18046

	Step 1	Step 2	Step 3	Step 4	Step 5	Step 6	Step 7	
Area	Existing permissions	Urban Intensification	Town expansion	Other sustainable settlements	Rural areas	Other opportunities	Green Belt	TOTAL
Weston-super-Mare	5576	1404	2950	0	0	0	0	9930
Clevedon	73	153	0	0	0	0	0	226
Nailsea	651	28	1102	0	0	0	0	1781
Portishead	119	373	0	0	0	0	80	572
Backwell	20	0	0	600	0	0	500	1120
Yatton/Claverham	231	0	0	160	0	0	0	391
Villages and other settlements	747	0	0	0	564	0	0	1311
Other areas	0	0	0	0	0	0	2715	2715

TOTAL	7417	1958	4052	760	564	0	3295	18046
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