

**STATEMENT OF CASE FOR THE REFUSAL OF
17/P/5545/OUT
FOR
OUTLINE PLANNING PERMISSION FOR THE ERECTION OF
UP TO 200 DWELLINGS, A HEALTH CENTRE, A DOCTORS
SURGERY, RETAIL OUTLETS AND OFFICE/EMPLOYMENT
SPACE WITH ALL MATTERS RESERVED FOR
SUBSEQUENT APPROVAL
AT
LAND OFF BLEADON ROAD NORTH SOMERSET**

**SUTHERLAND PROPERTY
& LEGAL SERVICES LTD**



PLANNING & ARCHITECTURAL CONSULTANCY SERVICE

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1. Introduction

1.1. The following is the Statement of Case for an appeal against the refusal of outline planning submission under reference under 17/P/5545/OUT.

1.2. The description of development is as follows:

"Outline planning permission for the erection of up to 200 dwellings, a Health Centre, a Doctors Surgery, retail outlets and office/employment space with all matters reserved for subsequent approval"

1.3. The application was received by the Local Planning Authority (LPA) on the 15 December 2017 and was validated on 20 March 2018.

1.4. The Application was refused on 17 September 2018.

1.5. The following reasons five reasons were given for refusal:

1. *This unallocated rural site is in an unsustainable location outside the settlement boundaries of Bleadon and fails to have regard to the requirement that residential development needs, at least, to be within the boundary of the village. The development would therefore generate demand for local services and employment opportunities on a scale that cannot be met without prejudice to other policies in the Development Plan, and these services and facilities are not regarded as readily accessible from the site by means other than the private car. The development is therefore contrary to and Core Strategy Policy CS33, the Site Allocations Plan and sustainable objectives in the NPPF.*
2. *The development by reason of its scale and character would fail to make a positive visual contribution to the quality of the local environment. In relation to this it is considered that the proposal would not respect or enhance the established character and appearance of this part of the village. The proposal is therefore not in accordance with Policies CS5 of the Core Strategy and DM10 and DM11 of the Sites and Policies Plan.*
3. *The applicant has failed to provide sufficient or adequate information in the Transport Assessment to inform this major application, and as a result fails to comply with the key objectives of sustainability development outlined within NPPF, and that it will not result in a detrimental effect on highways safety contrary to Policy DM24 of the Sites and Policies Plan Part 1.*
4. *The applicant has failed to provide sufficient information in terms of flood risk and has not satisfied the requirements of the Sequential and Exceptions Tests under the National Planning Policy Framework (NPPF) and therefore fails to*

satisfy the requirements of Policy CS3 of the Core Strategy and Policy DM1 of the Sites and Policies DPD.

5. The applicant has failed to provide adequate ecological survey information to demonstrate compliance with the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017. Under these circumstances this large-scale development fails to have regard to and is contrary to Policy CS4 of the Core Strategy and DM8 of the Sites and Policies Plan.

- 1.6. This Statement provides an outline of the principal submissions that will be put forward at the Public Inquiry requested by the appellant. Appendix I includes a list of the relevant planning and other documentation which the appellant may refer to or use in evidence at the Inquiry.
- 1.7. The appellant reserves the right to refer to all email correspondence with the LPA before, during and after the application submission and receipt of decision.
- 1.8. The appellant has also submitted a Draft Statement of Common Ground which is intended to be agreed before the production of the proofs of evidence.
- 1.9. For clarity a non-determination appeal was submitted for this application. Following the receipt of the decision notice the Statement of Case has been amended to reflect the reasons for refusal.

2. The Site and Planning History

- 2.1. The application site consists of approximately 8 hectares of pasture land currently used for grazing in association with a neighbouring agricultural enterprise. The site has been farmed since time immemorial and has recently been the subject of a planning application for the erection of a replacement barn to serve the agricultural holding. Full details of that application are available under reference 17/P/1178/F.
- 2.2. Previous proposals to develop the site, known locally as Sanders field, were the subject of community consultation in 2008, 2011 and more recently in relation to this scheme in May 2018.

3. Key Issues

- 3.1. This appeal has been submitted for consideration following the refusal of application 17/P/5545/OUT.
- 3.2. The Decision Notice sets out 5 reasons for refusal, these are summarised as follows:
 1. Failure to comply with Policy CS33;
 2. Scale and effect on character;
 3. Failure to supply sufficient information on Highways Impact;
 4. Failure to provide sufficient information on Flood Risk and Sequential Test; and
 5. Failure to provide adequate ecology survey information.
- 3.3. The original non-determination appeal set out two outstanding matters to be agreed with the LPA before a decision could be issued:
 - Policy CS33 and the 5 year housing land supply; and
 - Ecological Impact
- 3.4. Appendix II sets out email correspondence with the LPA to demonstrate how this conclusion was reached.

Policy CS33 and the 5 Year Housing Land Supply

- 3.5. As set out in the Planning, Design and Access Statement submitted with application 17/P/5545/OUT, it is accepted that the site sits outside of the settlement boundary. As such the application would usually be considered under Policy CS33 of the North Somerset Core Strategy (January 2017).
- 3.6. Policy CS33 looks to control development outside of the settlement boundary to protect the open character of rural areas.
- 3.7. The weight given to Policy CS33 must be considered against that of the National Planning policy Framework (NPPF), including amendments made in the July 2018 update.
- 3.8. North Somerset cannot currently demonstrate a 5 year housing land supply, this has been proven in two recent planning appeals:
 - Farley Fields in Backwell was recovered by the Secretary of State who issued his decision in March 2018. It concluded that the LPA had only a 3.9 year supply.

- Laney Drove in Weston Super Mare where the inspector concluded the LPA have 4.4 years supply based on more up to date figures available (decision issued June 2018)

- 3.9. The above appeals are attached as Appendix III and IV respectively.
- 3.10. Paragraph 73 of the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements plus an additional buffer of 5% moved forward from later in the plan period to ensure choice and competition in the market for land.
- 3.11. After the Farleigh Fields decision was issued, we wrote on behalf of several appellants to the LPA in relation to the Secretary of State findings (Appendix V). At that point in March 2018, the LPA responded setting out that they felt the figures upon which the Secretary of State had based his findings were out of date and that they would instead rely upon the Laney Drove decision expected in June. The Laney Drove decision confirmed the lack of a five year housing land supply.
- 3.12. In circumstances where the Council is unable to demonstrate a five year supply of deliverable housing sites, the housing policies in the local development framework are not considered to be up to date and paragraph 11(4) of the NPPF is engaged. This states that where the development plan is absent, silent or relevant policies are out-of-date, the presumption is to approve sustainable development unless any adverse impacts of doing so would “significantly and demonstrably” outweigh the benefits.
- 3.13. As a result, in the absence of a 5 year housing supply, the settlement boundaries and other criteria identified through local policies to control housing development are deemed out of date and carry little weight. This means that whilst the application site is outside the previously defined limit, this cannot be used to oppose the principle of development until the five-year supply is restored. In Appendix III it can be seen that the LPA still give significant weight to Policy CS33 despite accepting that they cannot demonstrate a 5 Year Housing Land Supply.
- 3.14. The Appellant wishes to establish that the weight the LPA are giving to CS33, in the case of this appeal, is inconsistent.
- 3.15. The LPA are continuing to give inappropriate weight to Policy CS33 following the decision at Laney Drove. It is argued that the circumstances of Laney Drove are not similar to that of this appeal.
- 3.16. CS33 was applied at Laney Drove because of a ‘Strategic Gap’, in this instance the appeal site is well located and fits within the natural envelope of the settlement.

- 3.17. In a more recent decision of 1 October 2018 (3199616), Land to the North of Leafy Way and Bartletts Way, Locking, Western-super-Mare (Appendix VI), the Inspector agreed with this approach. Paragraph 11 is reproduced below for ease of reference:

“While I note the approach taken by the Inspector in the Laney Drove Decision where she afforded ‘very considerable weight’ to that proposal’s conflict with the development plan, that was, in part, due to the additional harm that would arise from the proposal’s impact on the strategic gap. Indeed, the Inspector in that case noted that the strategic gap, and that particular site within it, played a significant role in ensuring that the environmental impact of unplanned growth does not cause significant adverse harm. The impact on the strategic gap does not form one of the reasons for refusing planning permission for the current proposal and the Council’s written evidence indicates that there is no objection in this respect. As such, I am not persuaded that the circumstances are sufficiently similar to indicate that I should adopt a similar approach to that taken in the Laney Drove appeal.”

- 3.18. The Appellant also asks the LPA to consider the officers report for 18/P/3625/OUT (Appendix VII), which was recommended for approval. The following paragraph is of interest:

“The principle of development must therefore be assessed in context of the conflict with Policy CS33, yet in the absence of a five-year supply of housing land this policy cannot be given full weight. As a consequence, the tilted balance of paragraph 11 of the NPPF applies, which dictates that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and this is a significant material consideration”

- 3.19. In this most recent decision the LPA accept the limited weight that can be given to CS33 because of their failure to show a 5 year housing land supply. This is in contrast to the officers report in support of the refusal of this application which fails to address the 5 year land supply position (despite its inclusion in the appellants original planning application supporting statement) at all. The LPA have given full weight to Local Policy which is in clear contravention of Paragraph 11 of the NPPF.
- 3.20. Whilst it is accepted the LPA can consider the weight to be attached to Policy CS33 in the context of the existing planning framework, they have failed to attribute the correct weight and failed to accept or even discuss the weight they give to the policy with the lack of Land Supply - see officers report and correspondence with the appellant. The inspector is asked to note that the Appellant will make a full costs application in this regard.

Sustainability

- 3.21. National policy supports a sustainable approach to development in rural areas with the emphasis being on supporting services, employment and facilities in larger villages. In the planning system substantial benefit is attached to housing supply by the Government, however this does not override all other considerations. As set out in the NPPF, where the adverse impacts of a proposal “significantly and demonstrably” outweigh the benefits, then planning permission should be refused.
- 3.22. The Government’s view of sustainable development is set out in the NPPF. Sustainable development has many strands, but its core dimensions fall into 3 broad limbs - economic, social and environmental. This outline application therefore should have been thoroughly assessed against each of these dimensions. Indeed, the appellant specifically drew this to the attention of the LPA but the LPA still rely on Policy CS33.
- 3.23. In assessing the relative sustainability at both settlement and site level, significant weight must therefore be given to the NPPF’s presumption in favour of sustainable development. Meeting housing demand is seen by the Government as a key economic driver and the provision of new housing, and in particular affordable housing, is in the wider public benefit. In line with national planning guidance the Council therefore must give substantial weight to the provision of additional housing in the wider ambit of sustainable development. This presumption in favour of development will only be outweighed if specific and significant harm can be identified that supersedes the wider public benefit.
- 3.24. The question therefore, is whether the settlement of Bleadon, and by extension, the application site, is a sustainable location for further development taking into account, economic, social and environmental factors. In this regard, with the proximity to the primary North Somerset settlement of Weston-super-Mare, public transport links along this route, and the availability of local services and facilities, the settlement is considered to be adequately connected. The proposed development will improve and enhance the village sustainability by creating much needed homes, improving local health services and increasing access to health care, improving highway safety on the entrances to the village and providing employment and retail opportunities. These factors were identified by the appellant through public consultation as being of key concern to the local community. The appellant will demonstrate with considerable evidence that the sustainability of the village relies upon future development, not least in providing community facilities but also to address the significantly skewed community dynamics towards older and retired owner/occupiers and a lack of social housing. Indeed, in terms of highway improvements, it is recorded that the Parish Council are significantly concerned to achieve highway safety improvements due to several highway deaths and collisions but that the LPA as Local Highway Authority cannot fund these necessary improvements.

3.25. It is the appellants case that that the LVIA as set out in the original submission clearly demonstrates that this appeal site does not have any effect on the 'coalescence' of the village with any existing settlement, nor is the assessed impact on the countryside considered to outweigh the planning gain of supplying 200 homes and health care in an area of high demand.

Recent legislative developments

3.26. The Appellant also wishes to draw attention to Appendix VIII. This is a table produced by the Department for Communities and Local Government following the Governments publication of the Housing White Paper and the updated draft of the National Planning Policy Framework (which is now adopted).

3.27. The table at Appendix VIII sets out the implementation and effects of the Governments implementation of the 'Standardised Methodology for Assessing Housing'.

3.28. The table shows that to use the new methodology now would see North Somerset having to find a requirement of over 300 extra new homes (above the current plan target) a year to meet demand.

3.29. The appellant accepts that the September 2018 population figures will influence the number of new homes required but, as national government have confirmed they will 'tweak' the formula to make sure the national target of 300,000 new homes is meet by the 2020's (see Appendix IX) it is felt that this number is an accurate representation of what will be required.

3.30. The above will influence North Somerset because as part of the Inspectors Report for the Sites and Polices Plan Part 2: sites allocation plan (Appendix X) a review of the plan and wider housing market area was considered necessary, with the Plan (in part) being found sound because of the commitment to such a review.

3.31. According to the North Somerset Local Development Scheme (April 2018) a review is expected in Spring 2019. As such the LPA will be required to use the 'Standardised Methodology for Assessing Housing' to substantiate their housing numbers that comes into force on the 24 January 2019

3.32. As North Somerset cannot currently demonstrate a 5 year housing land supply (Appendix III, IV and VI) it is considered that the addition of 300 new dwellings a year will see North Somerset falling further behind in the deliverable supply of housing, it is inconceivable that their assessment of the planning balance should fail to consider the land supply position.

Scale and Effect on Character

- 3.33. The Appellant submitted a through Landscape Visual Impact Assessment (LVIA) as part of the application (see Appendix I).
- 3.34. In the Officers Report the LPA make no reference to this document and the work contained within it
- 3.35. The Officer refers to the fact that the refusal reason is based on views from the AONB when viewed from the wider landscape; again these views were provided with the application. The Officer's Report makes no reference to these views or the opinions of the LVIA report.
- 3.36. The Appellant intends to demonstrate that there is no significant impact on the AONB and that any perceived harm is outweighed by the benefits new development will bring to North Somerset.

Highways Impact

- 3.37. A Technical Note (Technical Note 2; Response to Highways Comments) was submitted to North Somerset on 6 August 2018 (Appendix XI,) this does not appear to have been uploaded to the LPA's planning portal, or considered in the officers report. In discussion with officers in correspondence (appendix XII) the appellant enquired as to whether officers had considered the additional evidence submitted at their request. Officers confirmed the evidence had been considered yet the officers report and discussion fails to reference or consider that evidence which addresses the concerns raised. Indeed, it is clear that the LPA did not consider this evidence, nor respond to its submission, nor identify what, if any, additional information was required to address comments made. In the absence of cooperation from the LPA, the appellant is at a loss to understand what further information the LHA / LPA require.
- 3.38. The Appellant will demonstrate that Highways concerns have been responded to in full and that this should not reasonably have been included as a reason for refusal.

Flood Risk and Sequential Test

- 3.39. An updated flood risk assessment and sequential test was submitted to the LPA on 20 July 2018 (appendix XIII) at the request of the LPA. As with the additional highways work this does not appear to have been uploaded to the LPA's planning portal or considered in the officers report. The EA did not object to the scheme and specifically referred to the receipt of this data

- 3.40. The Appellant will establish that this issue has been dealt with within the application process and should not reasonably have been included as a reason for refusal.

Ecological Impact

- 3.41. The Appellant accepts that due to time scales not all Ecological Surveys have been completed. However, the inspector is asked to note that the appellants submitted full assessment of the site detailing a complete site evaluation for protected species, trees and hedgerows. This was considered sufficient by the LPA to register the application but at a late stage in the application process the LPA ecologist requested further surveys be carried out. The appellant had already detailed that these further surveys were being carried out at site pre-planning and the further ecologist requests were and are still being addressed by way of ongoing seasonal surveys. There is no dispute between the parties as to the survey evidence sought or instructed and the surveys will be completed prior to any reasonable timescale for the Reserved Matters application to be submitted.
- 3.42. As the Appellant understands the importance of assessing and mitigating against any ecological impact development may have they had instructed their Ecologist to prepare a 'worst case scenario' mitigation package for the site.
- 3.43. The Appellants Ecologist is confident that any ecological mitigation arising as a result of the surveys still being carried out based on the initial assessments submitted have already been considered, addressed and included within this proposal to achieve appropriate mitigation. No protected species will be adversely impacted by the proposal. Indeed, the proposal will enhance and improve the local ecology with a comprehensive package of site specific ecology provision and increased quality habitat.
- 3.44. As this application is at outline stage the mitigation will also be controlled at the reserved matters stage, with the appellant happy to accept suitable conditions with regards to ecological surveys and mitigation prior to commencement.

Further Considerations - Lack of cooperation

- 3.45. The Appellant wished to make it clear to the Inspector that their Planning Agent offered the LPA the opportunity to reissue their decision notice, taking into account additional information had been submitted with regards to Highways, Flood Risk and the Sequential Test (appendix XIV).
- 3.46. The LPA did not wish to reissue the decision notice. The inspector will note the LPA position that they had considered this evidence despite the clear content of the officers delegated report failing to discuss, refer to or address the additional submissions and two reasons for refusal relying upon the erroneous position.

3.47. The LPA have a duty, as does the appellant, to appropriately minimise matters of disagreement between the parties when preparing for an appeal. The appellant had attempted to assist the LPA in recognising their error and removing or at least justifying these reasons for refusal. The appellant is still in the process of attempting to agree a statement of common ground to clarify this matter as at present there is no justification nor explanation as to the additional evidence or information the LPA seek and therefore the appellant cannot reasonably address the reasons.

Further Considerations – The Planning Balance

3.48. It is the Appellants Case that the LPA has failed to assess the weighted planning balance (Section 38(6) of the TCPA (2004)), which requires material considerations to be considered in conjunction with an up to date Development Plan.

3.49. The LPA has focused on the perceived negatives of the application, with no attempt to offset these against the positives the application site can bring to the area.

3.50. The appellant wishes to redress this balance and set the case for a positive planning application that:

- Addresses the 5 year housing land supply shortage;
- Provides for the undersupply of affordable housing;
- Provides a new local centre;
- Evidences mitigation for effects on the AONB, to show a negligible impact and a package of ecology enhancements;
- Provides for development within a sequentially proven safe flood zone area
- Provides highway upgrades exceeding £250,000 that improve the local highway network to the benefit of the whole community
- Provides economic improvements to settlement sustainability
- Provides health services to improve settlement sustainability
- Provides employment within the village in the short and long term
- Addresses current imbalances in housing type in the village
- Improves opportunity for the use of cycles and walking and interconnects with the village and surrounding network
- Contributes to the establishment of enhanced community transport provision
- Delivers playspace/ open space
- Respects and retains existing landscape features and is specifically designed to support and retain landscape features
- Addresses existing on road parking and access issues for residents adjacent the boundary shared with the quarry

4. Section 106/ Conditions

- 4.1. Conditions have yet to be agreed by the LPA, but it is the appellants intention to enter discussion with the LPA over proposed conditions and enter this into the Statement of Common Ground.
- 4.2. S106 contributions have been discussed and the appellant will attempt to agree all required S106 contributions and enter this into the Statement of Common Ground. It should be noted that the appellant submitted a commitment to meeting s.106 requests in the s.106 heads of terms required for registration and this position has not changed. If a s.106 agreement cannot be executed prior to inquiry, the appellant will submit a s.106 unilateral undertaking. At present the S106 requests are:
 - AH provision
 - Contribution of £120 per dwelling towards sustainable transport
 - Landscape maintenance commuted sum

The Appellant recognises these are reasonably required contributions.

5. Conclusion

- 5.1. The appellant will demonstrate that this scheme will achieve sustainable development, in accordance with the aspirations of the NPPF and NPPG. The site is well located to provide a large quantum of housing in a part of the country that is seeing a large, unmet, demand for housing.
- 5.2. With the introduction of new housing targets and a national drive to build 300,000 dwellings per annum by the 2020's it is the appellants firm conviction that this site is suitable and sustainable and will bring benefits to the village and surrounding area.
- 5.3. The appellant will demonstrate that the LPA can not give significant weight to Policy CS33 as they cannot demonstrate a 5-year housing land supply. Policy CS33 constrains development in areas that are suitable for development.
 - The Appellant will also establish that development at this location is sustainable, as per the definition set out in paragraph 14 of the NPPF and will demonstrate this by evidencing the social, economic and environmental benefits to the community as a whole.
 - In summary, the appellant will conclude that outline planning permission should be granted and that the appeal should be allowed
- 5.4. The Appellants case will also demonstrate that refusing the application on the grounds of highways impact and flooding is particularly onerous as the information was submitted to the LPA well in advance of a decision being issued.

6. Costs Application

- 6.1. The appellant will be making a costs application for this appeal.
- 6.2. The LPA failed to co-operate with the appellant throughout the application process; information and technical documents which address some of the reasons for refusal have not been referred to in the Decision Notice.
- 6.3. The LPA have produced a one sided report which fails to take into account the planning balance. No attempt was made to balance the LPA's proven lack of 5 year land supply against the benefits the scheme will provide.

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix I

Appendix I

LR002 Sept 2017 -Land Ownership Plan

LMP001 – Jan 2018 illustrative Masterplan

2 Ditch Option

LVIA Figures 1 –12

Site Location Plan

Affordable Housing Statement

Planning Design and Access Statement

Preliminary Ecological Appraisal

Flood Risk Assessment

Health Impact Assessment

Landscape and Visual Impact Assessment

Statement of Community Involvement

Skeletal Green Travel Plan

Tree Survey and Constraint's Plan

Utility Assessment Report

Application Form

Hydrant Mapping for Land Off Bleadon Road – Avon Fire and Rescue Service

Public Consultation Comments

Statutory Consultation Comments

All Email Communication

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix II

Fw: Planning Reference Number: 17/P/5545/OUT Land Off Bleadon Road Bleadon North Somerset - Response to Consultation Objections lodged by North Somerset Council (Flood Risk Management Team & Development & Environment)

Chris Burton

Mon 10/09/2018 10:10

Inbox

To: Chris Burton <chris@sutherlandpls.com>;

From: David Tate <David.Tate@n-somerset.gov.uk>

Sent: 13 August 2018 13:45

To: Amanda Sutherland

Subject: RE: Planning Reference Number: 17/P/5545/OUT Land Off Bleadon Road Bleadon North Somerset - Response to Consultation Objections lodged by North Somerset Council (Flood Risk Management Team & Development & Environment)

Hi Amanda.

As a result of your highway response, I am waiting for a reply from the NSC Highway team.

I am considering a report to the next P & R Committee on the 12th September 2018.

The decision will therefore be issued on or around the 12th September.

I trust this is acceptable.

Regards

David P Tate

PRINCIPAL PLANNING OFFICER

Development & Environment

North Somerset Council

Please note my working days are Tuesday, Wednesday and Thursday am (working from home).

Tel: 01934 426207 or 01934 888888

E-Mail: david.tate@n-somerset.gov.uk

Post: Town Hall, Walliscote Grove Road, Weston-super-Mare, BS23 1UJ

Web: www.n-somerset.gov.uk

From: Amanda Sutherland [mailto:amanda@sutherlandpls.com]

Sent: Monday, August 13, 2018 12:03 PM

To: David Tate <David.Tate@n-somerset.gov.uk>

Cc: Jessica Roberts <admin@sutherlandpls.com>

Subject: Re: Planning Reference Number: 17/P/5545/OUT Land Off Bleadon Road Bleadon North Somerset - Response to Consultation Objections lodged by North Somerset Council (Flood Risk Management Team & Development & Environment)

Good morning Dave

I hope you enjoyed your leave - where are the LPA on this one now? I sent over the highway work requested but am awaiting any highway s.106 requests. Obviously CIL will be dealt with by the relevant officer although we have not, as yet, received any CIL forms from the LPA team (presumably due to its recent implementation).

My client is really pushing for an appeal given the LPA are not accepting the land supply position in the NPPF para 14 presumption - can you advise when you consider you can issue a decision otherwise I am instructed to appeal for non determination.

kind regards

kind regards

Amanda Sutherland LLb(Hons) PG Dip LPC

Sutherland Property & Legal Services Ltd
1st Floor
1 Stamford Fort Cottages
Stamford Road

Plymouth
PL9 9SQ

Tel: 01752 403983 or 07949 047543
Email: admin@sutherlandpls.com
http:// www.sutherlandpls.com/home

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From: David Tate <David.Tate@n-somerset.gov.uk>
Sent: 26 July 2018 10:41
To: Amanda Sutherland
Subject: RE: Planning Reference Number: 17/P/5545/OUT Land Off Bleadon Road Bleadon North Somerset - Response to Consultation Objections lodged by North Somerset Council (Flood Risk Management Team & Development & Environment)

Hi Amanda.

I note your comments and await the additional highway clarification in due course. I also note that your client recognises the need for a s.106 to be completed in relation to requests for contributions. Please be aware that the scheme is liable to CIL and details are available on the NSC web site. The only areas not covered by CIL are affordable housing, green infrastructure, and highway works. Attached are the S106 affordable housing and green infrastructure requests. I will get the highway S106 request as soon as possible.

Regards

David P Tate
PRINCIPAL PLANNING OFFICER
Development & Environment
North Somerset Council
Please note my working days are Tuesday, Wednesday and Thursday am (working from home).
Tel: 01934 426207 or 01934 888888
E-Mail: david.tate@n-somerset.gov.uk
Post: Town Hall, Walliscote Grove Road, Weston-super-Mare, BS23 1UJ
Web: www.n-somerset.gov.uk

From: Amanda Sutherland [<mailto:amanda@sutherlandpls.com>]
Sent: Friday, July 20, 2018 12:06 PM
To: David Tate <David.Tate@n-somerset.gov.uk>
Cc: Rebecca Gooding <admin@sutherlandpls.com>
Subject: Fw: Planning Reference Number: 17/P/5545/OUT Land Off Bleadon Road Bleadon North Somerset - Response to Consultation Objections lodged by North Somerset Council (Flood Risk Management Team & Development & Environment)

Dear David

Further to our recent correspondence, please find attached our response and additional information in relation to flooding as requested by your flood consultee. I trust this will meet the request and look forward to your confirmation.

We expect the additional highway clarification response shortly and I will then forward it to you.

That should then complete the additional clarifications requested by consultees and enable a decision. We are continuing to carry out the further ecology surveys latterly requested by Susan Stangroom but as these will not be prepared in a reasonable timeframe due to seasonal requirements we are relying on the ecology assessments submitted to date. We are aware of appeal decisions where the inspectorate have allowed the continuation of requested surveys prior to submission of RM application where the ecology conclusions

demonstrate that regardless of additional surveys, the mitigation proposed will meet the statutory requirements. It is a pragmatic approach by inspectors under the requirement to bring forward housing applications in areas of housing need without delay. In this matter we consider that the information already supplied is sufficient to determine the potential impact and mitigation required.

I should add that our client recognises the need for a s.106 to be completed in relation to requests for contributions but none have been received from the LPA to date. We will need to supply you with a draft for discussion regardless of whether you are approving or refusing and would therefore be grateful if you could forward any contribution requests made. You will appreciate that we review the LPA website regularly - there does seem to be an admin error on this application on your site. At present there are two separate lists of "documents" and "comments" with the "comments" section broken down into statutory consultees and community. Under stat consultees there are no responses at all. However, when you enter "documents" some statutory consultee responses are to be found there (as are some community responses). As a result it is difficult to ascertain what if any responses have been received - do you think you could ask your admin team to tidy it up please/ supply any received that you have not previously forwarded to ensure we capture all feedback.

We obviously submitted our suggested heads of terms as part of the application based on your SPD requirements but have not been able to progress any further in the absence of any requests.

kind regards

Amanda Sutherland LLb(Hons) PG Dip LPC

Sutherland Property & Legal Services Ltd
1st Floor
1 Stamford Fort Cottages
Stamford Road

Plymouth
PL9 9SQ

Tel: 01752 403983 or 07949 047543
Email: admin@sutherlandpls.com
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From: Nick Jackson <NJackson@ColeEasdon.com>

Sent: 20 July 2018 11:28

To: Amanda Sutherland

Cc: Dean Frosoni

Subject: Planning Reference Number: 17/P/5545/OUT Land Off Bleadon Road Bleadon North Somerset - Response to Consultation Objections lodged by North Somerset Council (Flood Risk Management Team & Development & Environment)

Dear Sirs

**Planning Reference Number: 17/P/5545/OUT Land Off Bleadon Road Bleadon North Somerset
Response to Consultation Objections lodged by North Somerset Council (Flood Risk Management Team & Development & Environment)**

We are in receipt of consultation responses from the Flood Risk Management Team (27 April 2018) and North Somerset Council (Development & Environment – received 13 June 2018) and would respond as follows.

Attachments:

1. FRA (Issue 3 – June 2018)
2. (Electronic Microdrainage file used for the determination of surcharged water level in rhyme)
3. Consultation response – Flood Risk Management Team North Somerset Council (27 April 2018)
4. Comments from David Robins - Development & Environment – received 13 June 2018

Response to Consultation objection by the LPA's Flood Risk Management Team

'The development is located within Flood Zone 2, and as such, is subject to the Sequential Test. Whilst it is for the LPA formally to apply this, we would request confirmation that there are no reasonably alternative sites available in areas of lower flood risk.'

CEC Response: The Sequential Test is being undertaken by Sutherland Property & Legal Services Ltd.

'Correspondence in the Appendix of the FRA confirms that the IDB have agreed the details of the rhyme modelling exercise and accepted a flood level within these features of c.6.214mAOD. Unfortunately, we are unable to verify this modelling fully and would request that the electronic files are provided for review.'

CEC Response: The requested electronic files are provided with this response.

'The FRA fails to take account of a number of reported flooding incidents along Bleadon Road which, given the site location could be either exacerbated or improved upon by the scheme. We would request that the applicant reviews the historic incidents and provides a commentary as to how, though the scheme, the risk of flooding downstream of the site will not be increased and, where possible, reduced.'

CEC Response: We are unaware of the details of specific flood incidents. The LPA's own Strategic Flood Risk Assessment (SFRA) and Surface Water Management Plan (SWMP) reports do not provide flood incident details. The reports only highlight locations where flooding has occurred. The FRA has been updated to include the relevant plans taken from these reports. Notwithstanding this, the development seeks to reduce existing flood risk elsewhere through the implementation of a sustainable surface water drainage strategy. The details of this strategy are presented within the updated FRA enclosed with this submission, and will result in reduced post development discharge rates to the existing rhyme system that are less than the prevailing greenfield discharge rates from the undeveloped site for storms up to the 1:100 year + 40% event.

'Run-off rates and proposed discharges from the site have been taken as the existing greenfield run-off figures based on the ICP SuDS methodology. Unfortunately, the proposed drainage strategy only seeks to mimic run-off rates and not volumes. All proposed surface water drainage should ensure that Long Term Storage is suitably provided to confirm that flood volumes downstream are not increased.'

CEC Response: Noted. We have now rerun the calculations, reducing the discharge rate to QBAR to account for the increased volume of runoff. There is no resultant increase in onsite storage requirement. Please refer to the enclosed updated FRA for details.

'The proposed strategy also relies on utilising the existing rhyme network with some modifications. At this point, no details of the proposed changes in terms of geometry and other such design measures are included within the FRA. Before we can agree to this strategy we would expect to see sufficient detail provided to confirm that not only is the design sufficient to accommodate the surface water volumes but that it promotes wider benefits in line with the SuDS manual whilst also not posing a health and safety concern.'

CEC Response: These details are now provided in the updated FRA.

'Given the proposed site layout, it is likely that source control features such as roadside swales and permeable paving subject to appropriate infiltration rates can be accommodated which will both improve the scheme in terms of sustainable drainage principles but also potentially reduce the need for overly deep drainage. We would request that the application is updated to take account of such features.'

CEC Response: Infiltration potential has been considered within the FRA. British Geological Society (BGS) records indicate that the site is situated on Mercia Mudstone Group - Mudstone and Halite-stone overlain by superficial Tidal Flat Deposits - Clay, Silt and Sand. Due to the high proportion of fines associated with this strata type, it is associated with poor infiltration characteristics. As such, infiltration SUDS is not considered feasible for this site. At c. 1.25m depth, the proposed rhyme storage will not be overly deep.

Response to Consultation comment by North Somerset Council (Development & Environment)

Sequential Test

Most of the site is in FZ2. A Sequential Test is therefore required to demonstrate that the development cannot be accommodated appropriately on land at a lower risk of flooding.

CEC Response: The Sequential Test has been undertaken by Sutherland Property & Legal Services Ltd. See appendix 6 of the attached FRA.

Exception Test

Para. 3.45 of the Core Strategy recognises that climate change could result in FZ2 land becoming FZ3 in the longer term. The Core Strategy considers that in some circumstances FZ2 should be treated as FZ3a for long-term planning purposes, though not for development management purposes. The draft revised NPPF takes a stronger line, stating that a sequential approach should be used in areas known to be at risk now or in the future.

The SFRA did not show FZ2 land at Bleadon as an area where FZ3 is likely to expand as a result of climate change. On this evidence, the site should be assessed as FZ2. However, the SFRA is now nearly 10 years old and does not reflect current climate change projections. It is therefore not possible to say from the SFRA how climate change is likely to affect the flood risk categorisation of this site. If evidence did show that the site should be assessed as FZ3a, then the Exception Test would need to be passed. If the site is considered as FZ2, no Exception Test is required for 'more vulnerable' development such as housing.

The FRA (3.4) considers that fluvial flood risk is low, even allowing for climate change, but makes no comment on tidal flood risk. Both types of flooding are referred in the section heading but tidal is not mentioned in the text following, nor in Table 3.1. Of the two types, it is tidal risk that is the closer to the site.

CEC Response: The EA's modelled data (2012) shows that for the 0.5% and 0.1% tidal events the undefended flood levels at the site are 6.3mAOD and 7.05mAOD respectively. These are present day levels (2012) and exclude climate change. Site levels vary from some 6.4m to 6.6mAOD. On this basis the site is classified as being within the 0.1% floodplain (Flood Zone 2). However, when climate change increases are applied in accordance with Central Government's published sea level rise allowances for the SouthWest, the undefended 0.5% tidal flood level increase to 7.365mAOD, thereby placing the site wholly within Flood Zone 3. Thus, the Exception Test needs to be applied.

To pass the Exception Test, it must be shown that the proposed development will:

- i) provide wider sustainability benefits to the community that outweigh flood risk, and;
- ii) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

In relation to the Exception Test, the updated FRA provides the necessary evidence to show that the development provides wider sustainability benefits to the area that outweigh flood risk and will be safe for its lifetime without increasing flood risk elsewhere. During a tidal climate change event, the existing flood defences on the River Axe could be overtopped or breached and the site could potentially flood to depths of 765 - 965mm. We have proposed the following mitigation measures in the updated FRA:

1. No ground floor sleeping accommodation
2. Ground floors to be floodable. Flood resilient construction measures to be incorporated into dwellings.

3. Inclusion of a flood warning and evacuation plan

We trust that this response and the attached updated FRA satisfactorily deals with the flood risk and drainage issues raised by North Somerset Council in their consultation responses.

Regards

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Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix III



Ministry of Housing,
Communities &
Local Government

David Hutchison
Pegasus Group
Pegasus House
Querns Business Centre
Whitworth Road
Cirencester
Gloucestershire GL7 1RT

Our ref: APP/D0121/W/16/3153935

Your ref: 15/P/0315/O

28 March 2018

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78
APPEAL MADE BY CHARLES CHURCH DEVELOPMENTS LTD**

**LAND AT FARLEIGH FIELDS AND 54, 56, 58 FARLEIGH ROAD, FARLEIGH ROAD,
BACKWELL, SOMERSET
APPLICATION REF: 15/P/0315/O**

1. I am directed by the Secretary of State to say that consideration has been given to the report of G D Jones BSc(Hons) DipTP DMS MRTPI who held a public local inquiry on 14-17 and 21-24 March 2017 into your client's appeal against the decision of North Somerset Council to refuse planning permission for your client's application for planning permission for residential development of up to 220 new dwellings with supporting infrastructure and facilities including the demolition of 56 Farleigh Road, in accordance with application ref: 15/P/0315/O, dated 7 June 2016.
2. On 21 March 2017, this appeal was recovered for the Secretary of State's determination, in pursuance of section 79 of, and paragraph 3 of Schedule 6 to, the Town and Country Planning Act 1990.

Inspector's recommendation and summary of the decision

3. The Inspector recommended that the appeal be dismissed.
4. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions, and agrees with their recommendation. He has decided to dismiss the appeal. A copy of the Inspector's report (IR) is enclosed. All references to paragraph numbers, unless otherwise stated, are to that report.

Matters arising since the close of the inquiry

4. On 29 September 2017, the Secretary of State wrote to the main parties to afford them an opportunity to comment on an email dated 15 September 2017 from North Somerset Council regarding the Council's revised Site Allocations Plan and position with regard to their 5 year land supply. The Secretary of State received your representations on 6 October. These representations were circulated to the other parties on 16 October 2017. No responses were received in reply to your representation. Copies of these letters may be obtained on written request to the address at the foot of the first page of this letter.
5. On 14 February the Secretary of State wrote to the main parties to afford them an opportunity to comment on change to the National Planning Practice Guidance ("the PPG") on 10th August 2017 on the Written Ministerial Statement ("WMS") on neighbourhood planning dated 12th December 2016. A list of representations received in response to this letter is at Annex A. These representations were circulated to the main parties on 1 March.
6. The Secretary of State has taken these representations into consideration when reaching his decision.

Policy and statutory considerations

7. In reaching his decision, the Secretary of State has had regard to section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.
8. In this case the development plan includes the remaining saved policies of the North Somerset Replacement Local Plan 2007 (NSRLP), the Core Strategy 2015, the Development Management Policies Sites and Policies Plan Part 1 2016 (DMPP Pt1) and Backwell Neighbourhood Plan March 2015 (the NP). The Secretary of State considers that the development plan policies of most relevance to this case are those set out at IR22-28.
9. Other material considerations which the Secretary of State has taken into account include the National Planning Policy Framework ('the Framework') and associated planning guidance ('the Guidance'), as well as the Written Ministerial Statement on Neighbourhood Planning of 12 December 2016 (the WMS), and associated Guidance (located in the PPG at Paragraph: 083 Reference ID: 41-083-20170810) and the Supreme Court ruling of 10 May 2017, *Suffolk Coastal District Council v Hopkins Homes Ltd and another; Richborough Estates Partnerships LLP and another v Cheshire East Borough Council (2017) UKSC 36*.

Emerging plan

10. The emerging plan comprises emerging local planning policy documents, the Site Allocations Plan Sites and Policies Plan Part 2 (the eSAP) and the Joint Spatial Plan (the eJSP).
11. Paragraph 216 of the Framework states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to

the policies in the Framework. While broadly consistent with the Framework, the eSAP has yet to reach an advanced stage and is subject to a significant number of unresolved objections, and therefore the Secretary of State has given it limited weight in his consideration. The eJSP has yet to complete examination, and the Secretary of State thus gives it moderate weight.

Main issues

Housing Land Supply (HLS)

12. The Secretary of State has carefully considered the Inspector's analysis of the supply of housing land in North Somerset (IR310- 336). He notes the main parties disagree over whether or not the Council can demonstrate a 5 year HLS.
13. The Secretary of State has had regard to representations from the Council, stating that by instructing the Council to proceed with the Proposed Modifications consultation, the Local Plan Inspector has demonstrated that she is satisfied that the additional housing sites have made the plan capable of being found sound, including in respect of the 5 year supply position.
14. The Secretary of State has also carefully considered your representations made on the 6 October 2017 where you strongly disagree with the council's representation that they can now demonstrate a 5 year HLS.
15. The Secretary of State notes that the Local Plan Inspector has not concluded that the Council can demonstrate a 5 year HLS, or that the Site Allocations Plan (SAP) is sound. He further concludes that the allocations set out in the SAP are subject to public consultation, and to the completion of the SAP examination, and as such it is not yet possible to conclude that they are suitable or deliverable.
16. He has therefore gone on to consider the appeal Inspector's analysis of the HLS position. For the reasons given at IR311 the Secretary of State agrees that the 'Sedgefield' methodology should be used when calculating HLS. He further agrees, for the reasons given by the Inspector at IR315-321, that there is a record of persistent under delivery, and as such that a buffer of 20% is applicable.
17. The Secretary of State has given careful consideration to the Inspector's analysis of housing delivery. With regard to small consented sites, the Secretary of State agrees that it is reasonable to apply a lapse rate of 10%, for the reasons given at IR323-324. As such he reduces total supply by four units, giving a subtotal of 8,213.
18. The Secretary of State has gone on to consider the disputed 'large consented sites'. For the reasons set out by the Inspector at IR325-327, he concludes that 328 units should be removed from supply, reducing the subtotal further to 7,885 (IR326).
19. With regard to 'Local Plan allocations' sites, the Secretary of State concludes, for the reasons given at IR328, that delivery should be reduced by 40 dwellings, giving a subtotal of 7,845.
20. He further reduces total delivery by 263 dwellings in regard to the 'strategic sites', for the reasons set out by the Inspector at IR329. The Secretary of State concludes that this gives a subtotal of 7,582 units.

21. For the reasons given at IR330-332, he deducts another 157 units from supply in respect of 'emerging allocations' sites, reducing the sub total to 7,425 dwellings. He discounts another 180 dwellings from the supply figure with regard to the empty homes allowance, for the reasons given at IR333-334. This gives a total deliverable supply figure of 7,245 units.
22. He sets this against a housing requirement of 9,293 dwellings, giving a 3.9 year supply of housing.

Written Ministerial Statement on Neighbourhood Planning 2016 (WMS)

23. The WMS sets out how planning applications and appeals should be determined in circumstances where the local planning authority cannot demonstrate a five year supply of housing, but a neighbourhood plan is in force. The Secretary of State concludes, for the reasons given, that the Inspector has correctly stated how the WMS should be interpreted (IR336). The Secretary of State notes that the WMS is less than two years old.
24. The Secretary of State has had regard to your representations of 28 February 2018, noting that at paragraph 9 of your letter you state that the WMS and the Guidance would not be relevant as the BNP does not allocate sites, and or, the Council cannot demonstrate a 3 year HLS. For the reasons given at paragraphs 13 above, he has concluded that the Council can deliver a 3 year supply of sites.
25. For the reasons given by the Inspector at IR361, the Secretary of State notes that the NP does not state a specific quantum of dwellings to be built, and that the Council does not use these sites in calculating its housing land supply. However, the Secretary of State has had regard to in particular paragraph 8.9 of the NP and the associated plan indicating development sites where residential development will be supported, and concludes that this means that the NP, when read as a whole, allocates sites for housing, in agreement with the Inspector at IR361. Given his findings on HLS, the Secretary of State therefore concludes that all three criteria of the WMS are met and, consequently, that the WMS (and associated Guidance) applies in this case, and therefore that significant weight should be given to the Neighbourhood Plan notwithstanding the fact that the local planning authority cannot demonstrate a 5-year supply of deliverable housing sites.

Location strategy for new development in the District

26. The Secretary of State has carefully considered the Inspector's assessment of the location strategy for new development (IR338-343). He considers the most relevant policies to be Core Strategy Policy CS32 which identifies Backwell as one of the nine 'Service Villages' and allows new development within as well as adjoining the Settlement Boundaries of Service Villages subject to certain criteria. He notes that the policy goes on to say that sites that lie outside the Settlement Boundaries for development in excess of about 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans.
27. The Secretary of State is in agreement with the Inspector (IR341) that the appeal development would substantially exceed 'about 25 dwellings', and thus conflicts with Policy CS32.

28. The Secretary of State accepts that the appeal proposal is outside the settlement boundary as defined by NSRLP Policy H/7. However, for the reasons given at IR343, he does not find any direct conflict with Policy H/7 or Policy CS33.
29. However, he further considers that the proposal conflicts with NP Policy Development 1 for the reasons given at IR343.

Character and appearance of the area

30. The Secretary of State has carefully considered the Inspector's analysis (IR344-358) of the impact on the character and appearance of the area. He notes that the Inspector has considered the appeal on the basis of public access within the site being limited to public rights of way which cross the site. For the reasons given, he agrees with the Inspector that the proposed development would have limited effect beyond the immediate area of the site. He further agrees that the proposed development would significantly affect the setting and character of Backwell (IR354) and this carries significant weight against the proposal. As such, he agrees with the Inspector that the proposal would conflict with Policies CS5 and CS2 of the Core Strategy, Policy DM10 of the DMPP Part 1, and Policy Development 1 of the NP. He further agrees, for the reasons set out at IR356 that the proposal would conflict with DMPP Part 1 Policy DM32.

Development plan

31. The Secretary of State notes that Policies DM10, DM25, DM32 and Policy CS5 are not said by any of the parties to be policies for the supply of housing (IR364) and thus agrees that they should carry full weight. Having had regard to the decision of the Supreme Court in *Suffolk Coastal District Council v Hopkins Homes Ltd and another; Richborough Estates Partnerships LLP and another v Cheshire East Borough Council [2017] UKSC 36*, and for the reasons given at IR365-368, he agrees that NP Policy Development 1 and Core Strategy Policy CS32 are no longer relevant policies for the supply of housing for the purposes of paragraph 49 of the Framework, and as such should carry full weight in this case even in the absence of a 5 year supply of housing land.
32. Given the conflict with NP Policy Development 1, the Secretary of State has had regard to p198 of the Framework, which states that where an application conflicts with Neighbourhood Plan that has been brought into force, permission should not normally be granted. As stated above, applying the WMS (and associated Guidance), the Secretary of State gives significant weight to the Neighbourhood Plan. Even were the WMS not engaged, the Secretary of State considers that following the *Hopkins* judgment NP Policy Development 1 is not a policy for the supply of housing, and as such it would still be given significant weight in the circumstances of this case.

Benefits of the proposal

33. The Secretary of State concludes that the appeal proposal would assist in delivery of affordable and market housing (IR384), including 30% affordable, in a sustainable location, in an area without a 5 year housing land supply. He further finds, for the reasons set out at IR369, that the proposal would deliver a range of social, economic and environmental benefits, including expenditure on construction and investment in the area, the creation of construction jobs, financial contributions towards offsite infrastructure, the provision of public open space and green infrastructure, the

enhancement of public rights of way an delivery of new footpaths, and enhancements to biodiversity.

Planning conditions

34. The Secretary of State has given consideration to the Inspector's analysis at IR374-379, the recommended conditions set out at the end of the IR and the reasons for them, and to national policy in paragraph 206 of the Framework and the relevant Guidance. He is satisfied that the conditions recommended by the Inspector comply with the policy test set out at paragraph 206 of the Framework. However, he does not consider that the imposition of these conditions would overcome his reasons for dismissing this appeal and refusing planning permission.

Planning obligations

35. Having had regard to the Inspector's analysis at IR380, the planning obligation dated 22 March 2017, paragraphs 203-205 of the Framework, the Guidance and the Community Infrastructure Levy Regulations 2010, as amended, the Secretary of State agrees with the Inspector's conclusion for the reasons given in IR380 that the obligation complies with Regulation 122 of the CIL Regulations and the tests at paragraph 204 of the Framework and is necessary to make the development acceptable in planning terms, is directly related to the development, and is fairly and reasonably related in scale and kind to the development. However, the Secretary of State does not consider that the obligation overcomes his reasons for dismissing this appeal and refusing planning permission.

Planning balance and overall conclusion

36. For the reasons given above, the Secretary of State considers that the appeal application is not in accordance with Core Strategy Policies, DMPP Policies, and NP Policy Development 1 of the development plan, and is not in accordance with the development plan overall. He has gone on to consider whether there are material considerations which indicate that the proposal should be determined other than in accordance with the development plan.
37. The lack of a 5-year housing land supply means that the presumption in favour of sustainable development applies, as set out at paragraph 14 of the Framework. However, given his findings on the NP WMS above, he concludes that the housing policies in the NP should be afforded significant weight, in line with the Guidance.
38. The proposals would deliver a range of social, economic and environmental benefits, in particular the provision of market and affordable housing (30%, 65 in number) in a sustainable location, in an area without a 5 year supply. This carries very significant weight in favour of the appeal proposal.
39. Against this is the conflict with the development plan, and in particular the Backwell NP and with NP Development 1, which is not a policy for the supply of housing. The Framework (paragraph 198) states that applications in conflict with a made neighbourhood plan should not normally be granted. The proposal would also cause harm to the character and appearance of the area. Overall the Secretary of State gives substantial weight to these adverse impacts.
40. Applying his planning judgment therefore, the Secretary of State concludes that the adverse impacts of granting the appeal development planning permission would

significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

41. The Secretary of State therefore concludes that the appeal be dismissed.

Formal decision

42. Accordingly, for the reasons given above, the Secretary of State agrees with the Inspector's recommendation. He hereby dismisses your client's appeal and refuses planning permission for residential development of up to 220 new dwellings at Farleigh Fields and 54, 56, 58 Farleigh Road, Farleigh Road, Backwell, Somerset.

Right to challenge the decision

43. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged. This must be done by making an application to the High Court within 6 weeks from the day after the date of this letter for leave to bring a statutory review under section 288 of the Town and Country Planning Act 1990.

44. A copy of this letter has been sent to North Somerset Council; Persimmon Homes and Backwell Parish Council, and notification has been sent to others who asked to be informed of the decision.

Yours faithfully

Phil Barber

Phil Barber
Authorised by Secretary of State to sign in that behalf

Annex A

SCHEDULE OF REPRESENTATIONS

Representations received in response to the Secretary of State's letter of 29 September 2017

Party	Date
David Hutchison, Pegasus Planning Group	6 October 2017

Responses received in response to the Representations from Pegasus Planning Group circulated 16 October 2017

Party	Date
Nil	

Representations received in response to the Secretary of State's letter of 14 February 2018

Party	Date
David Hutchison, Pegasus Planning Group	28 February 2018

Report to the Secretary of State for Communities and Local Government

by G D Jones BSc(Hons) DipTP DMS MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 14 July 2017

TOWN AND COUNTRY PLANNING ACT
NORTH SOMERSET COUNCIL
APPEAL BY
CHARLES CHURCH DEVELOPMENTS LTD

Inquiry opened on 14 March 2017

Land at Farleigh Fields and 54, 56, 58 Farleigh Road, Farleigh Road, Backwell, Somerset

File Ref(s): APP/D0121/W/16/3153935

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File Ref: APP/D0121/W/16/3153935

Land at Farleigh Fields and 54, 56, 58 Farleigh Road, Farleigh Road, Backwell, Somerset

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Charles Church Developments Ltd against North Somerset Council.
- The application Ref 15/P/0315/O, dated 22 January 2015, was refused by notice dated 7 June 2016.
- The development proposed is described as residential development of up to 220 new dwellings with supporting infrastructure and facilities including the demolition of 56 Farleigh Road, creation of new vehicular.
- The Inquiry sat for 7 days on 14-17 and 21-24 March 2017.

Summary of Recommendation: The appeal be dismissed

Preliminary Matters

1. Determination of the appeal was recovered by the Secretary of State during the course of the Inquiry by way of a direction dated 21 March 2017 for the reason that 'the appeal involves proposals for residential development of over 150 units or on sites of over 5 hectares, which would significantly impact on the Government's objective to secure a better balance between housing demand and supply and create high quality, sustainable, mixed and inclusive communities'.
2. The appeal proposal is for outline planning permission with access only to be determined at this stage and with appearance, landscaping, layout and scale reserved for future approval. Whilst not formally part of the scheme, I have treated the details relating to these reserved matters submitted with the application and the appeal as a guide as to how the site might be developed.
3. The application was refused for two reasons. In summary the grounds for these were that:
 - 1) The appeal site is not within Backwell's 'Settlement Boundary' nor allocated for development in the Backwell Neighbourhood Plan, and the scale of the proposed development would be disproportionate to the size of the existing village and have a detrimental impact upon the character of the area; and
 - 2) The proposed development, outside the established settlement, would be out of keeping with the overall character of the village and its landscape setting and quality causing harm to the setting and edge of the village.
4. The Development Management Policies Sites and Policies Plan Part 1 July 2016 (the DMPP Pt1) was adopted after the appeal planning application was determined, as were the remitted policies of the North Somerset Core Strategy (the Core Strategy). As a consequence, a number of policies of the North Somerset Replacement Local Plan 2007 (the NSRLP) are now superseded, including Policy H/8, as superseded by Core Strategy Policy CS33, but not Policy H/7. Additionally, Policy GDP/3 of the NSRLP has been superseded by Policy DM32 of the DMPP Pt1.
5. A legal agreement dated 22 March 2017 containing planning obligations pursuant to Section 106 of the Act (the S106 Agreement) was submitted by the appellant during the Inquiry - CD18.9a.
6. I carried out a site visit on 20 March 2017, which covered the site and the

surrounding area. That visit was unaccompanied, as agreed by the parties at the Inquiry, and included all locations and views which those parties had asked me to cover.

7. After I had closed the Inquiry a further appeal decision (the Oldmixon Road appeal) was brought to my attention concerning proposed development involving housing at a site at Weston-super-Mare¹. As that decision is in the public domain and the given the need for consistency among Inspectors, having sought the views of the main parties on its admission, I decided to take it into account along with the other material submitted prior to the closure of the Inquiry. I have advised the parties of my decision in this regard.
8. Additionally after the Inquiry closed, the Supreme Court issued a judgment on 10 May 2017 (the Supreme Court Judgment)² concerning, among other things, the interpretation of para 49 of, and its relationship with para 14 of, the National Planning Policy Framework (the Framework). I gave the parties opportunity to make further submissions in view of that Judgment and I have taken these into account when writing my report³.

The Site and Surroundings

9. The appeal site is located within the village of Backwell, which is situated roughly 0.5km to the south of the settlement of Nailsea, some 8km roughly to the west of the Bristol urban area and 14km to the north east of Weston-super-Mare. Backwell is identified in the Core Strategy as a Service Village. According to the 2011 Census, it had a resident population of 4,589 and the total number of dwellings was some 1,891.
10. The village has a range of facilities with a variety of shops including two convenience stores and a post office. It also has Infants, Junior and Secondary schools, medical and dental centres, and a swimming pool and leisure centre. Most of these facilities are within walking and/or cycling distance of the site. Backwell is also served by public transport including by a mainline railway station with direct services to Bristol, Weston-super-Mare and beyond, as well as by regular bus services.
11. The site, known locally as Farleigh Fields, is located between Backwell, including West Town, to the west, Farleigh to the northeast and Church Town to the south. These three areas have, over time, become linked by development, principally in the form of ribbon development along Farleigh Road, the A370, to the north of the site linking Backwell and Farleigh, and along Church Lane to the east connecting Farleigh and Church Town. Consequently, the site is largely encircled by the buildings which now line the surrounding roads, which also include Dark Lane to the west. Exceptions to this arrangement include where the site extends northward into Farleigh Road in the form of two T-shaped areas. The first includes an existing undeveloped corridor between 30 and 32 Farleigh Road and a length of highway, while the second includes Nos 54, 56 and 58 and a further stretch of this street.

¹ INSP.6

² [2017] UKSC 37 on appeals from: [2016] EWCA Civ 168, [2015] EWHC 132 (Admin) and [2015] EWHC 410 (Admin)

³ INSP 5

12. Other than Nos 54, 56 and 58, the land is largely undeveloped and in agricultural use. It generally rises, reasonably steeply in parts, from Farleigh Road southward towards Church Town. Two public rights of way cross the site. Footpath ref. LA2/6/10 crosses it on a generally northwest-southeast alignment linking Farleigh Road, initially via the corridor between Nos 30 and 32, with St Andrews Church/Church Lane in Church Town. Footpath ref. LA2/4/20 crosses the site on a northeast-southwest alignment linking Church Lane in the vicinity of St Andrews Church with another part of Church Lane in the vicinity of Fairfield Primary School to the northeast. These footpaths form part of a circular walk around Backwell known as the Backwell Round.
13. The site is not located within the Green Belt, is not designated as Local Green Space (LGS) in the development plan and contains no heritage assets, nor is it directly affected by any wider adopted landscape, ecology or heritage designations. It does, however, lie within 4km of the North Somerset and Mendip Bats Special Area of Conservation (the SAC), and the Brockley Halls Stables SSSI forms part of the SAC site and is within 2.4km of the closest part of the site.
14. Backwell Church Town Conservation Area (the Conservation Area) also lies to the south of the site but no part of the site is within the designated area. The only point at which the site adjoins the Conservation Area is where the right of way noted above connects to the neighbouring Grade I listed St Andrews Church.
15. The North Somerset Landscape Character Assessment SPD 2005 (the Landscape Character SPD) identifies a series of Landscape Character Types and Landscape Character Areas (LCAs)⁴. The site straddles two LCAs with its upper part falling within LCA E6: Cleeve Ridge and the lower part within LCA J5: Land Yeo and Kenn Rolling Valley Farmland. The strategy for the former is to conserve the peaceful remote character, and for the latter to conserve the intact pastoral landscape with hedgerow networks, winding rural roads and stone farmsteads, while strengthening elements of weaker character such as village edges and orchards⁵.

Planning Policy

16. The Framework outlines a presumption in favour of sustainable development, which it indicates has three dimensions – economic, social and environmental. Para 14 sets out how this presumption is to be applied and indicates that development proposals which accord with the development plan should be approved without delay, while going on to say that where it is absent, silent or relevant policies are out-of-date, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits or specific policies in the Framework indicate development should be restricted.
17. In respect to housing delivery, it requires North Somerset Council (NSC) to meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the

⁴ Extracts at CD1.27a App.8 and CD15.4 Appx 5

⁵ Further details of these LCAs are set out at CD14.4 paras 3.3 to 3.14

housing strategy over the plan period. Applications for housing should be considered in the context of the presumption in favour of sustainable development.

18. The Framework adds that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. The Written Ministerial Statement on Neighbourhood Planning of 12 December 2016 (the WMS) is also relevant in this regard. Among other things it states that relevant policies for the supply of housing in a neighbourhood plan should not be deemed to be 'out-of-date' under para 49 of the Framework where all of the following apply:
- The WMS is less than two years old, or the neighbourhood plan has been part of the development plan for two years or less;
 - The neighbourhood plan allocates sites for housing; and
 - The local planning authority can demonstrate a three-year supply of deliverable housing sites.

The parties disagree over whether Backwell's neighbourhood plan allocates sites for housing and whether NSC can demonstrate either a three or a five year supply of deliverable housing sites.

19. The WMS also states, among other things, that the Government confirms that where a planning application conflicts with a neighbourhood plan, planning permission should not normally be granted⁶, yet communities who have been proactive and worked hard to bring forward such a plan are often frustrated that it is being undermined because their local planning authorities cannot demonstrate a five-year land supply of deliverable housing sites.
20. The second refusal reason also expressly alleges conflict with Framework paras 56, 64, 66 and 109 resulting from the appeal development.
21. Although weighty material considerations, neither the Framework nor the WMS change the statutory status of the development plan. The development plan for the area includes the remaining saved policies of the NSRLP, the Core Strategy, the DMPP Pt1 and Backwell Neighbourhood Plan March 2015 (the NP).
22. In view of the changed development plan context since the planning application for the appeal development was determined, NSC indicated prior to the Inquiry that the development plan policy conflict alleged in its refusal reasons is now in respect to Policy H/7 of the NSRLP, Policies CS5, CS12, CS32 and CS33 of the Core Strategy, Policy DM32 of the DMPP Pt1, and Policy Development 1 of the NP. The evidence also refers to DMPP Pt1 Policies DM10 and DM25 which are 'linked' to Structure Plan Policies CS5 and CS12 respectively.
23. The Core Strategy covers the plan period 2006-26 and was originally adopted in April 2012. Following a legal challenge to Policy CS13, which had set the area's housing requirement, it was remitted for re-examination. A number of other policies, including Policy CS32, were also remitted on the basis that should the housing requirement change there may be consequences for those Policies. All other policies remained adopted, including Policies CS5 and CS12. Policy CS13

⁶ This consistent with Framework para 198

was re-adopted with an increased minimum housing requirement of 20,985 dwellings in September 2015, while the other remitted policies, including Policy CS32, were re-adopted in January 2017.

24. The plan period of the NSRLP ran to 2011. Policy H/7 remains part of the development plan. It establishes the 'Settlement Boundaries' for the area and is primarily concerned with proposed development within rather than beyond those boundaries.
25. The character, distinctiveness, diversity and quality of North Somerset's landscape are to be protected through Core Strategy Policy CS5 and DM Policy Plan Pt1 Policies DM10, while Policy DM25 aims to protect and enhance the existing public rights of way network and ensure the provision of new and improved multi-user routes connecting with new developments. Core Strategy Policy CS12 and Policy DM32 of the DMPP Pt1 relate to high quality design and place-making.
26. Core Strategy Policy CS32 identifies nine 'Service Villages', which include Backwell. It states that new development within or adjoining the Settlement Boundaries of Service Villages which enhances the overall sustainability of the settlement will be supported subject to the number of criteria, but that sites outside the Settlement Boundaries in excess of about 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans. Its supporting text at para 4.85 states that 'The Council will not support proposals which either on their own or in aggregate cause significant adverse impacts on the character or functioning of the village.'
27. Policy CS14 also refers to those settlements in setting out the broad district-wide distribution of new dwellings based on the following hierarchy and minimum net additional dwellings to be delivered across the plan period:
 - Weston-super-Mare will be the focus for new residential development, including the strategic allocation at Weston Villages, with 6,300 dwellings in the Weston urban area plus 6,500 at Weston Villages;
 - Then most additional development is to take place at the towns of Clevedon, Nailsea and Portishead totalling 5,100 dwellings;
 - At Service Villages there will be opportunities for small-scale development of an appropriate scale either within or abutting settlement boundaries or through site allocations totalling 2,100 dwellings; and
 - Elsewhere development will be more strictly controlled although appropriate development will be acceptable within the settlement boundaries of infill villages totalling 985 dwellings.
28. Core Strategy Policy CS33 indicates that development outside the areas covered by other area based policies of the Core Strategy, including CS32, will be strictly controlled in order to protect the character of the rural area and prevent unsustainable development.
29. The appeal site is not allocated for development in the NP. Its Policy Development 1 states, among other things, that housing development in Backwell which is at a level appropriate to the size and character of the settlement will be supported and adds that infilling, defined as one or two additional dwellings, will also be acceptable. Para 8.9 refers to 'development sites' and states that 'the Neighbourhood Plan identifies sites where residential

development and in the case of Sites A and B, residential and employment development, is supported.' Five 'development sites', A to E inclusive, are shown, delineated on an accompanying map.

30. The evidence also refers to NP Policy Development 4, which states that significant development of agricultural land that has been demonstrated to be necessary should also demonstrate that it prioritises the use of poorer quality agricultural land over the use of higher quality agricultural land.
31. Although not part of the development plan there are also two emerging local planning policy documents, the Site Allocations Plan Sites and Policies Plan Part 2 (the eSAP) and the Joint Spatial Plan (the eJSP).
32. The Publication Version of the eSAP, dated October 2016, identifies proposed residential allocations to meet the Core Strategy housing requirement as well as reviewing existing sites and identifies potential LGS and strategic gaps. The appeal site is not proposed to be allocated for development in the eSAP, while it does propose to designate some, but not all, of the site as LGS. At the time of the Inquiry the eSAP was the subject of a significant number of unresolved objections, which will need to be considered at the Examination in due course.
33. The eJSP is a strategic plan being prepared jointly by the West of England authorities for the plan period 2016-2036. It is intended that it will identify the overall housing requirement and district apportionment, strategic development locations and key infrastructure requirements; and set the context for a new North Somerset Local Plan 2018-2036 which will review and roll-forward the existing plans. The latest housing target for the eJSP area is around 105,000 dwellings of which around 32,200 should be affordable. The eJSP Consultation document Towards an Emerging Spatial Strategy includes a potential strategic development location at Nailsea/Backwell for some 3,600 dwellings. It is common ground between the main parties that the eJSP is at an early stage of preparation and carried limited weight at the time of the Inquiry.

Planning History

34. The appeal site has been the subject of the number of planning applications for residential development since the mid-1980s, the most recent of which was dismissed on appeal by the Secretary of State following an Inquiry in 2000 (the 2000 Appeal)⁷. The site has also been promoted for development through the plan-making process. Although it has been recommended by Local Plan Inspectors for allocation in the past it has remained unallocated⁸.

The Proposals

35. The appeal planning application as initially submitted proposed the development of up to 340 dwellings. However, the application was revised in July 2015 reducing the number of dwellings proposed to up to 220. The revisions to the application included a revised Concept Master Plan, Parameter Plans and amendments to an internal road linking two proposed areas of housing, and were supported by a number of other revised documents which were updated to deal with the changes.

⁷ CD8.1 – Inspector's report for appeal ref. APP/D0121/A/99/1035049, dated 10 October 2000

⁸ CD18.13 - Woodspring Local Plan Inspector's Report – Statement of Decisions and Reasons, dated June 1999

36. The revised Concept Master Plan⁹ shows two linked residential development parcels with a total area of some 7.3ha, covering roughly 35% of the overall site. Some 12.9ha of the site, roughly 60%, is shown as being proposed to be retained as green infrastructure, including landscape buffers and public open space. Existing hedgerows and trees within the site are proposed to be retained except where sections are to be removed to accommodate the internal access road. The Design and Access Statement states that the proposed houses would be mostly 2 storey with 2.5 storey buildings in key locations, while the residential development would have a net density of some 25 dwellings per hectare¹⁰.
37. The land between the two hedgerows which runs almost parallel to footpath LA2/6/10 is proposed to be used as public open space. While it would be left largely undeveloped it would be crossed by a new road that would link the two proposed housing areas. A further area of open space would be retained on the southern/eastern parts of the site, on its upper slopes, which would separate the proposed development from the Conservation Area to the south. An area of some 5.5ha within the southern field is proposed to be retained as agricultural grazing land with the existing public access rights retained and enhanced. These principal areas of retained open space would form roughly a T-shape with the two areas of proposed housing to either side. The alignments of the two existing rights of way are not proposed to be altered.
38. Consent is sought at this stage for access details. A new vehicular access is proposed to Farleigh Road running between Nos 54 and 58, which would be retained as houses while No 56 would be demolished. Associated works are proposed within the existing highway including pedestrian crossing refuges and a right hand turning lane off Farleigh Road into the site. The access proposals also show details of works to where the footpath LA2/6/10 meets Farleigh Road, a further pedestrian crossing refuge and a new Toucan crossing to Farleigh Road.
39. With the exception of those areas adjacent to and within Farleigh Road where highway/access works are proposed, the site stands as an area of undeveloped land outside of, but largely adjacent to, the Backwell Settlement Boundary.

Other Agreed Facts

40. NSC and the appellant (the main parties) produced a general Statement of Common Ground (the SoCG) prior to the inquiry¹¹. Backwell Parish Council (BPC), a Rule 6 party at the Inquiry, was not a signatory to the SoCG. The main parties have also agreed a separate Housing Land Supply Statement of Common Ground (the HLS SoCG)¹². The SoCG describes the site, the proposal and the policy context. Along with the HLS SoCG, it also confirms that the main parties agree that:
- The appeal proposal conflicts with Core Strategy Policy CS32 given that the scheme would exceed 25 dwellings and the site is not allocated for housing in the development plan;
 - NSC does not have an adopted Site Allocations Plan which allocates sites in excess of 25 dwellings at the Service Villages and PN Policy Development 1

⁹ CD1.5

¹⁰ CD1.19

¹¹ CD11.1 and CD11.1a

¹² CD11.2

makes no reference as to whether all new housing should be within the Settlement Boundary;

- The adopted housing requirement of 20,985 dwellings from 2006 to 2026 forms the appropriate figure against which to assess housing land supply and, in that regard, it is appropriate to assess supply for the five year period 1 April 2016 to 31 March 2021;
 - When annualised the requirement, which was not calculated until 2013 or adopted until September 2015, has not been achieved in any of the previous 8 years, while the annualised requirement of NSRLP was broadly met for the period 2006-11. Additionally, there was a backlog at March 2016 of 2,498 dwellings against the adopted minimum housing requirement and it is unlikely that that minimum requirement will be achieved in 2016/17;
 - The Sedgfield methodology should be used when calculating the five-year housing land supply;
 - A number of the emerging site allocations, designed to accommodate the housing requirements of the Core Strategy, will be outside the current defined Settlement Boundaries, and they are being reviewed as part of the eSAP but no such change is proposed in the vicinity of the appeal site;
 - Backwell has been identified by NSC as being the most sustainable service village in North Somerset¹³, and is capable of accommodating new development appropriate to the size and character of the settlement in order to enhance the village's role as a local hub for community facilities and services, has the ability to support sustainable patterns of living, has a range of facilities within walking and cycling distance of the site and the proximity of public transport services is likely to encourage use of these services;
 - The appeal proposals accord with Core Strategy Policy SC16 to deliver 30% affordable housing on site as part of the scheme and there is an identified and unmet need for affordable housing across North Somerset;
 - The planning obligations within the S106 Agreement are likely to mitigate a number of impacts of development on community infrastructure and it covers all infrastructure items that were requested by NSC, including in respect to education, highways and public open space, and that there is an existing deficit of open space within the parish; and
 - The proposed development is acceptable in arboricultural terms and most of the trees and hedgerows would be retained, would not harm the setting of the Conservation Area nor that of any nearby Listed Building, is not likely to have a significant effect on the SAC and, following the implementation of the recommendations set out in the ecological assessment, it would result in a net gain to biodiversity.
41. It should also be noted that during the course of the Inquiry both main parties' positions on anticipated housing supply over the relevant five year period evolved somewhat in view of each other's evidence such that some aspects of the HLS SoCG are superseded. Their updated position is set out in a spreadsheet, which they jointly prepared and submitted towards the end of the Inquiry¹⁴.

¹³ CD.5.8 and CD.5.9

¹⁴ The spreadsheet in question forms part of CD18.18

42. The summaries of cases of the parties set out in the following sections are based on the closing submissions¹⁵ and on the written and oral evidence, with references given to relevant sources, up to the point at which I closed the Inquiry. It should be noted that that evidence was put prior to the Supreme Court Judgment and as such it should be read in the context of the parties' pursuant comments¹⁶. In summary, these comments are that in the view of both NCS and BPC the weight to be given to development plan policy is unaltered, and in the view of the appellant only Core Strategy Policies CS14 and CS32 and NP Development Plan Policy 1 are now relevant policies for the supply of housing and overall the appellant does not believe that the Judgment materially effects its evidence as previously presented.

The Case for North Somerset Council

Introduction

43. NCS considers that this is a case about a housebuilder that has purchased and wishes to develop a site which is demonstrably special to the people of Backwell and which holds particular local significance because of its recreational value and its contribution to the character and setting of the village.
44. It contends that although the appellant appears to have controlled the site for many years, and that it undoubtedly understands that planning is intended to be plan-led, it has decided to promote its development outside the development plan process. It adds that that is so notwithstanding that the Core Strategy clearly indicates schemes of this scale should be advanced through a local or neighbourhood plan, even as NSC prepares for the examination of its eSAP. According to NSC the appellant faces the difficulty that the site is not allocated in the NP and may have calculated this did not matter when it lodged its appeal. However, in the light of the WMS, NSC considers that what the NP says is now a matter of considerable importance and local people are entitled to expect their NP to be given effect.
45. NSC sees it as no surprise in the circumstances that nearly 1,000 villagers have formally objected to the scheme. It also adds that 'they are doubtless fortified by the fact that past attempts to develop this special site have foundered because of the harm that would be caused to the character of the village'.
46. Thus the balance to be struck is, in NSC's view, between the benefits of providing about 10 times more housing and affordable housing than it considers the policy indicates is appropriate in this kind of location, and harm this would cause to the character and setting of the village. More generally, NSC sees this appeal is an important test of the weight which is to be afforded to neighbourhood plans which the Housing White Paper (the White Paper)¹⁷ indicates are likely to play an increasingly important role in shaping local communities and turning the rhetoric of localism into reality.

Issue 1 - Effect on the locational strategy for new development in the district

47. Core Strategy Policy CS13 requires a minimum of 20,985 new homes to be delivered over the plan period, while Policy CS14 specifies the broad distribution

¹⁵ INSP.2, INSP.3 and INSP.4

¹⁶ INSP.5

¹⁷ CD3.4

of those dwellings:

- (1) The focus will be on Weston super Mare, including strategic allocations at Weston Villages. Accordingly, in NSC's view, Policy CS28 provides that new development should take place within or adjacent to the settlement boundary, but sites for in excess of about 75 dwellings outside the boundary must be brought forward through the Local Plan or Neighbourhood Plan process.
 - (2) Outside Weston "most additional development will take place at the towns of Clevedon, Nailsea and Portishead, on sites within or abutting settlement boundaries, but outside the Green Belt". NSC says that Policy CS31 stipulates that sites of more than about 50 dwellings outside a settlement boundary must be brought forward through the development plan process.
 - (3) Core Strategy Policy CS32 provides that in Service Villages there will be opportunities for "small-scale development of an appropriate scale either within or abutting settlement boundaries or through site allocations". NSC considers that the key words here are 'small scale'.
48. Policy CS32 specifies what is meant by "small-scale development" within or abutting Service Villages – the short point, in NSC's view is that outside Service Villages' settlement boundaries sites for more than about 25 dwellings must be brought forward as allocations through Local Plans or neighbourhood plans.
 49. Thus, in NSC's opinion, the Plan seeks to direct large scale development to sites in or adjacent to the most sustainable locations; 'large scale in this context means more than about 50 dwellings, while 'most sustainable locations' means Weston-super-Mere, Weston Villages, Clevedon and Nailsea. Service Villages are intended to grow, but only small increments of up to 25 dwellings are intended to be brought forward on the edge of settlements through the development management process according to NSC.¹⁸
 50. The flexibility imparted by the development management process under Core Strategy Policy CS32 is, in NSC's view, intended to ensure the requirement will be met over the plan period without threatening the character of villages, over-burdening their infrastructure or undermining the spatial strategy, while it is also calculated to ensure the form, design and scale of development reinforces local distinctiveness.¹⁹
 51. NSC considers that it is possible that in some cases larger schemes could be accommodated without harming those policy objectives. However, in a plan-led system, the question of whether, in a particular village, that is so, how big a scheme can be accommodated and where it should take place ought, in the view of NSC, to be mediated through the Local Plan or Neighbourhood Plan process; while Policy CS32 does not admit the development of larger sites through the development management process under any circumstances. NSC adds that although there was reference during the Inquiry to development at Yalton, that is not necessarily due to Policy CS32 and the Inquiry has not been told about the full circumstances associated with what happened in those other cases.

¹⁸ NSC also state: That flexibility also relaxes the strict constraint on development in the countryside adjacent to a settlement boundary imposed by NSRLP Policy H/7, such that it is 'hopeless' to argue settlement boundaries only reflect the need to meet the historic housing requirement. Setting to one side the fact the eSAP alters settlement boundaries to accommodate the required quantum of development, provided proposals satisfy criteria relating to the qualities and scale of Policies CS28, CS31 and CS32 they do not constrain future housing growth.

¹⁹ CD5.5 paras 69 and 70 respectively

52. The NP, as part of the development plan, defines the village's settlement boundary. Policy Development 1 admits development at a level appropriate to the size and character of the village.²⁰ NSC contend that 'appropriate' development is not confined to that which is within the settlement boundary, such that, reading the Plan as a whole, Policy Development 1 can and should be read consistently with Core Strategy Policy CS32. It follows, in the view of NSC, that NP Policy Development 1 allows development of up to about 25 homes abutting the settlement boundary provided a scheme would satisfy the other criteria of Policy CS32.
53. NSC says that the appeal proposal exceeds the threshold specified by Policy CS32 by a factor of 10 and consequently 'it is likely to cause the kind of mischief' the Examining Inspector for the remitted Core Strategy policies sought to avoid when he specified that threshold.
54. Therefore, the effect of allowing the appeal would be to cause conflict with, and undermine, the locational strategy of the development plan, in NSC's opinion; and the appellant's planning witness Mr Hutchinson concedes conflict with Policies CS14 and CS32 at paras 7.92, 8.30 and 8.47 of his proof of evidence.

Issue 2 - Effect on the character and appearance of the area

The scope of the issue

55. This issue is addressed by the appellant's landscape witness Mr Cooper²¹, and NSC state that he expressly agreed that the second refusal reason makes three particular allegations, namely that the erection of 220 dwellings outside the settlement boundary would be a form of development:
- 1) Out of keeping with the overall character of the village;
 - 2) Out of keeping with its landscape setting and the quality of that setting; and
 - 3) That (1) and (2) would cause harm to the setting and appearance of the edge of the village.

The scope of the appellant's evidence

56. NSC maintain that Mr Cooper acknowledges that the parties do not join issue on the scheme's impact on the wider landscape in itself, whether viewed as a resource, that is as a receptor in its own right, or in terms of its wider visual impact. On this basis NSC also states 'Mr Cooper's evidence generally, and his repeated references in chief to the report prepared by NSC's landscape architect, is akin to a striker who wheels away to celebrate in front of a disbelieving stadium, having just shot his football into the wrong goal'.

The 'correct' approach

57. NSC sees the 'way home' as being indicated by the second refusal reason's reference to Core Strategy Policies CS5 and CS12. Policy CS5 is headed 'Landscape and the historic environment', while Policy CS12 is concerned with 'achieving high quality design and place making'. It added that Mr Cooper agreed that these strategic policies are 'operationalised' by DM10 and DM32 respectively²². NSC considers this to be important:

²⁰ CD5.11, p.11

²¹ CD14.4, para 1.13

²² CD5.6 - Links to CS5 and CS12 on pages 28 and 76 respectively

- 1) DM10 requires that all development proposals should be ‘...carefully integrated into the natural built and historic environment, aiming to establish a strong sense of place, respond to local character, and reflect the identity of local surroundings, whilst minimising landscape impact’. These matters relate, in NSC’s view to place and character, rather than landscape in itself.
 - 2) In a similar vein, DM32 requires that ‘The design and planning of development proposals should demonstrate sensitivity to the local character, and setting, and enhance the area taking into account the existing context. Design solutions should seek to enhance *local distinctiveness* and contribute to the creation of a sense of *place and identity*.’ (NSC’s emphasis) And continues ‘Proposals that reflect community aspirations and values will be encouraged. Proposals which cause unacceptable harm to the character or appearance of the area will not be permitted.’
58. NSC considers that the impact of the scheme on the character and appearance of the area therefore requires:
- 1) An appreciation of Backwell’s existing ‘sense of place’; that is, those features which impart particular character and identity.
 - 2) Consideration of the extent to which the scheme would respect and enhance those characteristics, reinforce what makes Backwell distinctive, and which give it its sense of place and identity.
59. NSC state that, when questioned about the application of Policy DM32, Mr Cooper agreed it is material to consider:
- 1) Whether the scheme enhances local distinctiveness²³.
 - 2) The local community’s aspirations.
60. NSC also maintains that Mr Cooper repeatedly rejected the notion that the site’s function is relevant to an assessment of the scheme’s impact on *character and distinctiveness*, and that specifically he rejected that it is material to consider:
- 1) The site’s role in creating physical and visual separation between Church Town and Farleigh/ West Town;
 - 2) The site’s function as a focus of the Backwell Round;
 - 3) The site’s actual use as public open space; and
 - 4) The community’s aspiration that the site should be designated as LGS.
61. However, adopting Framework para 64, NSC’s case is that the impact of a scheme on the character of an area is inseparable from an analysis of the way it functions.²⁴ Thus Mr Cooper’s rejection of this principle, in NSC’s view, serves to underline the narrow scope of his evidence and its limited relevance to this issue.

The character of Backwell and how the site contributes to that character

62. In NSC’s view Backwell’s distinctive character arises from the historical pattern of development of the hamlets of Church Town, Farleigh, Backwell Common and West Town. Each was established in the Mediaeval period. They became linked by ribbon development along Church Lane and Farleigh Road in the early part of the 20th Century. The last major phase of development was in the 1980’s, which

²³ NSC additionally stated that - while it serves to underline the appellant’s ‘misplaced’ focus on the scheme’s wider landscape impact - in re-examination Mr Cooper was invited to agree that the issue of whether the scheme enhances local distinctiveness is not a matter that had been raised by NSC, but that is incorrect - see for example DC14.5 paras 9.6 and 9.25-9.27.

²⁴ DC14.5 para 9.1 for instance

saw the village expand north towards the railway, and the consolidation and growth of West Town.

63. In that context NSC considers that Mr Cooper agreed that Church Town has a particularly distinctive character, with St Andrews Church as its focus standing in an elevated location at the heart of the Conservation Area, which is marked by a mix of architectural types, styles and materials and where plot sizes and the orientation of properties are irregular. There is relatively little modern infill and it is subservient to the rich, fine grained and historic character of this area. Most important of all, in NSC's view, the Appellant's Heritage Assessment states:

"The hamlet is situated against a dramatic sylvan backdrop formed by the wooded scarp and associated coombes of Backwell Hill to the south, and is linked to the main body of Backwell by Chapel Lane and Dark Lane. *Open fields lie to the east, west and north (the field to the north being the proposed development site) of the Conservation Area, resulting in the readability of the hamlet as a separate settlement to the main sprawl of Post-war Backwell*".²⁵ (NSC emphasis)

This, in NSC's view, emphasises 'in the appellant's own words' that Church Town is a separate settlement from 'the main sprawl'.

64. The open fields referred to in that Heritage Assessment make a distinctive contribution to the setting of Backwell in NSC's opinion; they physically separate Church Town from Farleigh and West Town and as a matter of fact and policy, the land is countryside. It has a rolling, open character. The 2000 Appeal Inspector described it as having a 'rural appearance'²⁶ and NSC considers that he was right. Mr Cooper agreed that nothing has changed on the ground and NSC sees that as having important consequences:

1) Looking north from the church, Farleigh and West Town are viewed at a distance of 400-500m across farmland. Development along Church Lane lies outside a person's peripheral vision. Church Town appears as an entirely different village.

2) Looking south from the entrance to the site, the sense is of leaving one settlement and setting out across the countryside to another. That sense of transition is sharpened by the contrast between the elevated view of the historic Church and the Conservation Area, which is reinforced by its hillside location compared with the strongly suburban character of Farleigh and West Town.²⁷ NSC say that a key point, noted by the 2000 Inspector and agreed by Mr Cooper, is that viewed from the footpath at the northern end of the site, ribbon development along Church Lane is either not perceived or is only seen in part.²⁸

65. The whole of the appeal site has remained free of development notwithstanding persistent pressure for its development since the mid-1980s. Mr Cooper ascribes its remaining intact to an *historical accident*²⁹. That, in NSC's view, is factually incorrect and it says may be due to him not being fully informed of the factual matrix within which his evidence was set; NSC maintains that it is the result of

²⁵ CD1.26 para 5.5

²⁶ CD8.1 para 119

²⁷ In NSC's view, whilst it is still possible to identify the older parts of the latter two hamlets, their historic character has been submerged by modern development.

²⁸ CD8.1 para 119 and Mr Cooper in cross examination indicated that about eight dwellings could be seen at first floor or roof level only, and that the eye is drawn to the church

²⁹ CD14.4, para 2.3

the consistent application of policy and development management, which has resulted in development being resisted for the reason, amongst other things, that it would harm the character of Backwell.³⁰

66. NSC considers that the countryside between Church Town and West Town / Farleigh is well used by the public, and is crossed by the two public rights of way. However, from NSC's perspective, the evidence to the inquiry was that the public wander freely across the whole of the site except for the two fields that are proposed for development and it considers that there was no evidence that they are, or have been, prevented from doing so. On that basis NSC maintains that the area actually operates as public open space.
67. Footpath ref. LA2/6/10 runs about 25 metres to the east of the western area of proposed housing and, in NSC's view, whether moving north or south it remains close at hand and clearly in view along most of its length. A substantial length of footpath ref. LA2/4/20 runs immediately to the south of the eastern site. The actual line of the footpath and that which is designated provide, in NSC's opinion, sustained and clear views across the eastern site. Consequently, NSC considers that the development sites operate as 'stand-offs', which keeps Farleigh and West Town at a distance and that maintain the rural quality of the footpaths and the strong sense of walking through relatively tranquil countryside.
68. According to NSC the importance of the site for recreation is clearly conveyed by the plan of the Backwell Round³¹; it is, NSC say, the hub of a series of circular walks around the village and the surrounding countryside and that function is a key component of character, and provides an opportunity to appreciate the characteristics of the surrounding area.
69. NSC sees the survival of this 'extensive area of highly accessible countryside within a village but outside its settlement boundary' as highly unusual³² and a distinctive feature of Backwell, which is 'cherished by local people', who have communicated their aspiration to keep it open through the NP, representations on the eSAP and some 953 representations on the planning application.

The effect of the appeal proposals

70. The development of the east and west parcels would, in NSC's opinion, detract from the character and distinctiveness of Backwell by:
- 1) Eroding the distinctive rural setting of Church Town.
 - 2) Harming the character / enjoyment of the rights of way / public open space.
 - 3) Frustrating the community's aspiration that the whole site should be designated as LGS, and harming the character of the alternative which NSC proposes to allocate through the SAP.

'Erosion of the distinctive rural setting of Church Town'

71. NSC also state that Mr Cooper accepted that houses up to 2.5 storeys in height

³⁰ NSC refers to decision notices in respect of applications 1016/84, 2116/85 and the 2000 Appeal decision paras 118-126 and 162 in support of this point - CD18.17 and CD8.1 respectively

³¹ CD5.11, p.5

³² NSC added that Mr Cooper could not think of another example and the example of Winscombe produced by the appellant's planning witness, Mr Hutchinson, is its view quite different as it is 'plainly much smaller' (entirely filled by 175 dwellings), it sits within the settlement boundary and its development is 'supported by local people' (it is allocated in the eSAP).

would be seen to rise up the hill from around 28m AOD adjacent to Farleigh Road up to a height of 37m AOD at the southern end of the western site. Whether viewed from St Andrew's Church, the entrance to the site from Farleigh Road or footpath ref LA2/6/10, the development of the western parcel would be perceived to virtually link West Town with Church Town, in NSC's opinion, and Church Town's distinct and separate historic character would be substantially eroded in conflict with the objects of DM10 and DM32, and consequently CS5 and CS12.

The character and enjoyment of the public rights of way and public open space

72. NSC also state that Mr Cooper agreed that those houses which would sit next to footpath ref. LA2/6/10 would stand up to 2.5 storeys in height.³³ Those houses would in NSC's view be a stone's throw away and highly visible. The journey between Farleigh / West Town and Church Town would, in NSC's opinion, cease to be a walk through open countryside but rather a walk next to houses, thereby destroying any sense of solitude, and would be likely to erode tranquillity.
73. According to NSC that 'loss' would be reinforced by these aspects of the scheme:
- (1) The road / footpath that links the east and west parcels is likely to require a retaining wall or similar structure, would sever the path and would appear as an entirely incongruous, urbanising feature, which would introduce all kinds of vehicular traffic across the path of walkers enjoying the countryside³⁴.
 - (2) The road / footpath would also have to be lit and it is doubtful whether very low intensity lighting would be fit for purpose if the residents are to walk to local schools and other facilities.
 - (3) The footpath itself would be hard surfaced and that would further urbanise the walk through countryside.
74. NSC considers that the development of the eastern site would have a similar impact on the basis that it would bring housing up the slope south to within a short distance of the footpath that people actually use and they would look down into 2-2.5 storey houses, which would fill the foreground along at least half of the length of footpath ref LA2/4/20.
75. The cumulative impact of both schemes must be considered in NSC's view. The diminished experience of footpath users heading south along footpath ref LA2/6/10 would, it says, be compounded by the development of the eastern site if they turn east along footpath ref LA2/4/20 to enjoy a circular walk, and walks in other directions along the Backwell round would be similarly affected.
76. In short, the rural, tranquil and open character of the rights of way and the public open space would be substantially diminished in the opinion of NSC and would also constitute a clear conflict with CS5, CS12, DM10, DM32 and DM25 and Framework para 75. NSC also considers it untenable to argue that the severance of footpath ref LA2/6/10 would not harm its enjoyment and amenity.

'Frustrating' the site's designation as LGS / 'harm' to future LGS

77. The local community aspires to secure the allocation of the whole site as LGS and NSC agrees that at least part of the site should be designated as such. That

³³ See CD1.8

³⁴ NSC added that Mr Cooper's submission that the land could be graded to avoid the need for retaining structures is inconsistent with the topographical drawings in the Flood Risk Assessment (CD1.23) and CD18.5a

question of how much land ought to be designated remains to be resolved via the eSAP. That LGS will be designated appears, in NSC's view, to be highly probable.

78. It also states that the appellant asserted repeatedly that NSC concluded the site ought to be designated as LGS solely because of its beauty, yet that is not so - Schedule 4 of the eSAP describes the proposed allocation as followings:
- 'Two fields meeting in a T shape near St Andrew's Church. Pasture, but considered to exceptionally warrant LGS designation because of their particular importance in terms of the setting of the Grade 1 listed St Andrew's Church, being high lying, prominent and visible from a significant distance to the south. They are also crossed by public rights of way, which lead towards and afford views of the church.'³⁵
79. NSC considers that the site also complies with other relevant criteria specified by the Framework³⁶ - it is closely proximate to the community it serves, and demonstrably holds a particular local significance.
80. The grant of planning permission would prevent allocation of the whole site as LGS. Alternatively, for the reasons set out above it would, in the opinion of NSC, harm the function of the land that it proposes to allocate as LGS, thereby detracting from amenity value, and that would frustrate a legitimate community aspiration, thus giving rise to further conflict with Policy DM32.

Issue 3 - Five year and three year housing land supply

Five year supply

81. NSC maintains that the appellant contention that NSC should not advance the case it has a five year supply because it has recently adopted a different position is wholly without merit. NSC expressly reserved its position on the five year supply at the Bleadon Hill and Oldmixon Road appeals³⁷ - in each case the principal issue was landscape impact, while recent development management decisions merely report NSC's tested supply, rather than the untested evidence advanced at this inquiry. That is both sensible and reasonable in its view.
82. However, there can be no doubt that the question of whether NSC can demonstrate a five years supply is a live issue. That is recognised by the eSAP Examining Inspector, who identified the tension between the views expressed by the Inspector who examined Policy CS13 and the other remitted policies of the Core Strategy, and the Sandford and Banwell appeal Inspectors³⁸. In short, NSC sees that there was 'bound to come a day' when five year housing land supply would have to be dealt with, and at this stage it is key given the WMS.

Whether NSC is an authority which has persistently under-delivered housing

83. NSC concedes that if it is concluded that there is a record of persistent under delivery it cannot demonstrate a five year housing land supply and adds that whether a record of delivery discloses persistent under delivery requires a conclusion to be drawn on two matters:
- 1) The period over which delivery is to be measured.

³⁵ CD5.7, pp64

³⁶ Para 77

³⁷ CD8.8 and INSP.6

³⁸ CD8.2 and CD8.3

- 2) The appropriate benchmark (the requirement).
84. In October 2016 the Banwell appeal Inspector concluded that the relevant period was 2006 to 2016 and that the relevant requirement was that specified in CS13³⁹. On that basis he found a 20% buffer ought to be applied. In November 2016 the Inspector examining the remitted Core Strategy policies expressed a contrary opinion. He had regard to the whole economic cycle - 1996/97 to 2015/16 - and measured against the benchmark of the fluctuating requirements which NSC had to plan for over that same period, which led him to decide that a 5% buffer was more appropriate. NSC considers that invites that examining Inspector's approach should be adopted in this case, and adds that it accords with that commended by the Local Plans Expert Group (the LPEG) and the timescale adopted by that Inspector also reflects National Planning Practice Guidance (the NPPG) at ID3-035.
85. NSC state that the appellant's housing witness, Mr Tiley, agreed that annual average delivery rates are 'simply abstract statistics'; they do not bear any resemblance to reality, which is characterised by 'lumpy' delivery, which reflects periods of 'feast and famine'. On that basis, NSC says, he accepted it is appropriate to measure delivery by reference to the total number of houses delivered compared with the requirement over the relevant reference period. It adds, there then followed a number of calculations, which can be summarised:
- 1) If one adopts the period 1996/97 to 2015/16 and applies the requirement specified by the development plan that was in force over that period (including a requirement for 1,049 dpa in 2013/14 and 2014/15), delivery just exceeds 86% of the target. That would not trigger a 20% buffer under the proposals contained in the White Paper.
 - 2) If the same period is adopted, and the number of years in which supply matched or exceeded any requirement that was in force at the time, NSC under-delivered in 11 out of 18 years, equating to a 61% delivery rate compared with the 65% threshold suggested by the LPEG.
 - 3) If a 10 year period is adopted whether by reference to the Core Strategy requirement or otherwise, NSC conceded that the picture is one of persistent under delivery.
86. NSC advances the approach of the remitted Core Strategy policies examining Inspector pending a full and rounded review of this topic via the eSAP process.

Housing Land Supply assuming a 20% buffer

87. NSC says that it is necessary to consider this issue in the light of the WMS.

Matters of principle

88. NSC adds:

(1) *Lead in times*: Mr Tiley accepted that the use of median lead in times obscures the fact that in reality the speed with which a site can be brought forward depends on a range of factors (size, brownfield/ greenfield etc). Consequently, his median delivery time for all sites is not terribly useful. He appeared to accept that a balanced judgment needs to be taken on a site by site

³⁹ CD8.3 para 30

basis, having regard to its particular characteristics and common sense professional judgments.⁴⁰

(2) *Lapse rates*: Mr Tiley accepted a lapse rate should be expressed as the number of dwellings permitted by a stock of planning permissions granted over a certain period which are not subsequently commenced in accordance with s91 or s92 of the Act, expressed as a percentage of the total number of all dwellings granted by all planning permissions for dwellings over that period.

He accepted that his assessment of lapse rates was not compiled on this basis. His approach of taking the number of extant permissions in a particular year and assuming the sum of those which lapse over the following three years can be used to calculate a lapse rate is plainly wrong. It would be rare for a permission to lapse in years 1 or 2, and his base stock will include permissions which have been implemented. In short, NSC sees the statistic he produces as meaningless.

NSC accepted that Ms Richards' assessment is 'infected by a similar defect'. The Inspector examining the remitted Core Strategy policies was not persuaded by either approach.⁴¹ Therefore, the 'standard' 10% lapse rate which Mr Tiley acknowledged tends to be the default statistic absent reliable evidence on the point should be adopted, although it is noted that the Banwell appeal Inspector adopted a 9% lapse rate and rejected the 'assertion' it should be set at 24%.⁴²

(3) *Draft allocations*: the Wainhomes judgment⁴³ and the NPPG ID3-031 indicate a local planning authority may rely on draft allocations provided they are supported by robust evidence of deliverability. The Banwell appeal Inspector was satisfied that those relied on by NSC satisfy that criterion, and that its research of their deliverability meant certain objections made could safely be set aside⁴⁴. NSC invited me to adopt the same approach in the light of NSC's housing witness, Ms Richards', knowledge and the 'advanced' stage of the eSAP.

(4) *Unimplemented local plan allocations*: NSC has reviewed the deliverability of sites it intends to carry forward into the SAP and considers as a matter of principle such sites should be counted towards the supply, consistent with the Banwell appeal decision⁴⁵ and the NPPG.⁴⁶

(5) *Empty homes*: while the potential contribution of empty homes was discounted by the Banwell appeal Inspector for want of substantial evidence, NSC considers that that shortcoming has been remedied and that its housing witness Ms Richards was not seriously challenged on the point.

(6) *Rural buildings*: Banwell appeal Inspector recognised that whilst supply from this source is finite it is not unrealistic to expect this category to continue to contribute to supply⁴⁷ and nothing has changed such that this category towards the overall supply.

(7) *Base date*: While the appellant is content to remove sites from the supply since 1 April 2016 it resists additions. NSC considers that this must be wrong in

⁴⁰ That was, in NSC's view, certainly the approach taken by Mr Tiley and Mrs Richards at the 'round table' session

⁴¹ CD5.5, para 19

⁴² CD8.3, para 41

⁴³ Wainhomes (South West) Holdings Ltd v Secretary of State for Communities and Local Government, Neutral Citation: [2013] EWHC 597 (Admin)

⁴⁴ CD8.3 para 40

⁴⁵ CD8.3 para 42

⁴⁶ ID3-030

⁴⁷ CD8.3, para 43

principle and Ms Richards' approach is to make balanced changes, so that the supply includes sites that have come forward since the base date. It says that this approach is justified and preferred to that of the appellant for three reasons:

- (a) The base date was nearly 11 months old at the time of the Inquiry. A practical, common sense approach dictates use of the most up-to-date information to calibrate the baseline. The data has its limitations. However, housing land supply calculations are inevitably imprecise. That does not matter provided their output is meaningful.
- (b) Ms Richards' oral evidence was that a similar approach was adopted in the Sandford and Banwell appeal decisions and NSC sees that there is no good reason for taking a different approach in this case.
- (c) NPPG ID3-041 to 043 show that one does not have to 'slavishly' tick off every source of supply.

Matters of detail

89. The main areas of dispute, in NSC's view, concern the deliverability and trajectory of large sites and the trajectory of strategic sites. The differences between the parties were narrowed during the round table session. The parties' experts have made a final response in respect of various outstanding matters. NSC asks the following are taken into account in coming to a view on this matter:

- (1) The Banwell appeal Inspector adjudicated on this issue less than 6 months ago and he made a full and carefully reasoned decision, having been presented with comprehensive evidence, which was tested through cross-examination.
- (2) He concluded that housing land supply stood at about a 4.2 year supply based on essentially the same information - he is unlikely to have got his assessment very wrong in NSC's view.
- (3) Since then the eSAP has advanced, strategic sites have progressed and planning permissions have been granted - the direction of travel, it says, is up.
- (4) In the circumstances, NSC says it would be surprising if supply were to fall below 4 years, and unsurprising if it were to be maintained or increased.

90. In that context, Ms Richards concludes that if a 20% buffer is applied supply stands at around 4.4 years, which is consistent with the Banwell appeal decision. NSC considers that it is 'probably about right'.

The consequence of the assessment of Housing Land Supply

91. If a 20% buffer is applied, or the supply is judged to fall below five years for other reasons, NSC's case is that the WMS is engaged and that full weight should be attached to the NP, as follows:

- (1) The WMS is less than two years old;
- (2) The NP allocates sites for housing:
 - (a) Page 12 sets out a plan entitled "Development Sites A to E";
 - (b) Sites A to E are identified by para 8.9 as "sites where residential development and in the case of Sites A and B, residential and employment development, is supported";
 - (c) The proposals map at p.21 repeats those allocations, a "potential

development site" is a perfectly good description of an allocation, it indicates clearly what kind of development will be permitted on each site; and

(d) The appellant's contrary argument is 'based on the misconception' that the absence of an *allocations policy* means there are no allocations. NSC says that is wrong because:

(i) If a plan makes allocations an *allocations policy* (which sets out criteria for making allocations) is unnecessary; and

(ii) If a "schedule" or list which identifies allocated sites is required, then one refers to para 8.9.

(3) NSC contends that it can demonstrate a three year supply of sites:

(a) It is submitted that this criterion simply means a three year supply calculated as part of the annual five year assessment;

(b) That would be consistent with the object of giving effect to housing proposals contained in neighbourhood plans "unless there is significant lack of land in the wider authority area" (i.e. less than three years based on the standard five year assessment);

(c) The appellant's alternative approach would make it less likely that the NP would have effect and that runs contrary to the policy of the WMS in NSC's view. It should also be noted that Aylesbury Vale DC has not adopted that approach as first claimed by the appellant's housing witness; and

(d) NSC's approach is consistent with the White Paper, which indicates that the Government proposes to allow local authorities to assess the state of their five year supply each year, but makes no proposal for a separate calculation of the three year supply (even though it affirms the policy of the WMS).

92. The result is that the provisions of NP Policy Development 1 should be given full weight and, as noted above, it should be read consistently with Core Strategy Policy CS32, in the view of NSC.

Other material considerations

93. NSC notes that the primary benefits of this scheme comprise the provision of market and affordable housing. Subject to the caveats that there is no evidence of a particular need for affordable housing in Backwell and that these homes are better located in more sustainable high order settlements, NSC accepts each benefit ought to be accorded substantial weight.

94. NSC comments on the other benefits claimed by the appellant⁴⁸ as follows:

(1) There is no substantial evidence that the development would inject substantial expenditure into the local economy, therefore, this carries limited weight;

(2) There is no evidence that the scheme would create construction jobs in the local area, therefore, this carries limited weight;

(3) The provision of homes for economically active people and younger families is an aspect of the provision of market and affordable housing and should be

⁴⁸ CD14.1, para 8.47

discounted;

(4) The provision of public open space and green infrastructure does no more than formalise what exists and which will be guaranteed by the designation of LGS, and therefore carries limited weight;

(5) The 'enhancement' of public rights of way is not a benefit at all as their hard surfacing would harm the character of the site; and

(6) The appeal site is said to be deliverable yet there appears to be an issue regarding the deliverability of the access, which puts a question mark against the scheme.

The overall planning balance

95. The balance to be struck, in NSC's view, is essentially whether the provision of up to 220 market and affordable houses on the site outweighs the scheme's 'admitted' conflict with the development plan's locational strategy for the provision of housing, the harm it would cause to the character and setting of Backwell and development plan policies for the protection of the environment.

The starting point

96. For the reasons that have been given, NSC considers that the scheme conflicts with Core Strategy Policies CS14, CS32, CS5 and CS12, DMPP Pt1 Policies DM10, DM25 and DM32 and NP Policy Development 1; and in accordance with s38(6) of the Act planning permission should be refused unless other material considerations indicate otherwise.

97. Furthermore, NSC maintains that that conflict with the development plan rebuts the presumption in favour of sustainable development with reference to *East Staffordshire DC v SSCLG and Barwood Strategic Land* [2016] EWHC 2973 (Admin) at paras 30 and 31. NSC adds that, whilst there exists a residual discretion to allow the appeal, that should only be exercised, if, in the circumstances of this case, the benefits of granting planning permission are considered to be exceptional.

98. More particularly, in NSC's view, in accordance with Framework para 17(1) and the WMS, local people who have invested substantial time and resources in preparing the Core Strategy, DMPP Pt1 and the NP are entitled to expect that the policies of each will be given effect, so that they act as a predictable and efficient framework for decision making.

99. If it is concluded that NSC cannot demonstrate a five year housing land supply the policies of the Core Strategy and the DMPP Pt1 (with the exception of DM25) will be deemed to be out of date. Nonetheless, they should continue to attract substantial weight in the opinion of NSC; each has been found to comply with the Framework within the last 12 months and they are a flexible suite of policies that balance the need for new homes with the need to protect the environment.

100. In any event, NSC considers that NP Development Policy 1 indicates clearly that this scheme should be rejected: there can be no serious room for doubt that it will harm the character and setting of the village. That policy objection continues to attract full weight in NSC's opinion. It also contends that the other material considerations that are 'prayed in aid' by the appellant do not tip the balance in its favour.

101. NSC considers that if this site is to come forward then in accordance with Core Strategy Policy CS32 it should be advanced through the SAP process; that would allow a sensible judgment to be made about its relative merits compared with the plethora of other sites which have been identified in the village⁴⁹. NSC adds that this is particularly important in view of the special importance local people attach to maintaining the site as open countryside, and its and Secretary of State's consistent findings that development would harm Backwell's character. Additionally, NSC considers the loss of best and most versatile farmland (BMV) land also weighs against the scheme.
102. For these reasons, NSC respectfully invites me to recommend to the Secretary of State that the appeal should be dismissed.

The Case for Backwell Parish Council

Approach

103. If the proposals are found to comply with the provisions of the development plan, then permission should be granted. However, in BPC's view it is obvious that is not the case; the proposals fail to comply at least with Core Strategy Policy CS32 and NP policies development 1 and 4 so there is no presumption in favour of the development. Indeed BPC considers that the proposals fail to comply with the development plan in a number of respects, as follows.
104. The Framework is clear that it does not change the statutory status of the development plan as the starting point for decision-making. It also has as its first core principle that planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. BPC considers the appeal proposal to be contrary to that vision.
105. BPC considers that it is important that the statutory presumption is applied properly; in particular, because certain policies may be out-of-date does not mean that the breach of the development plan becomes a technical or trivial one. Such breaches, being the breach of the policies and vision put in place to secure sustainable development appropriate to the particular needs and characteristics of the plan area, remain potentially very significant and weighty matters. The Framework does not advocate that if policies are out of date then its para 14 stands alone as providing the decision-making framework; rather, in BPC's view, the Framework emphasises that the presumption in favour of the plan remains the proper starting point.
106. Consequently, in any weighing exercise under s38(6) or under Framework para 14 proper consideration and weight must be given to the breaches of the plan on the negative side of the balance, as is made very clear in, for example, the NPPG ref 41-083 which guides the approach to breaches of a neighbourhood plan where there is not a five year housing land supply: 'In this situation, when assessing the adverse impacts of the proposal against the policies in the Framework as a whole, decision-makers should include within their assessment those policies in the Framework that deal with neighbourhood planning. This includes paras 183-185 of the Framework; and para 198 which states that where a planning application conflicts with a neighbourhood plan that has been brought

⁴⁹ See CD5.10

into force, planning permission should not normally be granted’.

107. This was also addressed in the East Staffs judgment⁵⁰, in the opinion of BPC, by means of a series of decision-making steps. The Court confirmed that the starting point remains the presumption in favour of the development plan (para 21). Where proposals are inconsistent with the plan Framework para 14 may be a material consideration that would justify departing from the development plan (para 22), yet this does not change the presumption that proposals inconsistent with the plan should not be approved (para 22). Paras 35 to 40 emphasise the relationship between the development plan and sustainable development. Framework para 14 uses the development plan as a pivot (para 30), such that the para 14 exercise allows for the breaches of the development plan to be weighed in the balance. Accordingly, in BPC’s view, the Framework para 14 balance is not to be carried out without regard to the development plan; that would be to displace the presumption in favour of the plan.
108. Framework paras 14 and 49 do not make ‘out-of-date’ policies for the supply of housing irrelevant in the determination of the application, nor prescribe the appropriate weight. Those policies and that legal presumption continue to apply. It is, therefore, ‘clear’ to BPC that the breaches of the plan weigh against the proposal within the para 14 balances, and that the presumption against such development continues to apply. The weight to be given to the policies and their breach is a matter for the decision-maker. This is likely to be less than the full weight that an up-to-date plan would attract, but it may still be significant and will vary according to the circumstances, including, for example:
- (i) The extent to which relevant policies fall short of providing for the five year supply of housing land; and
 - (ii) The action being taken by the local authority to address it.
109. BPC submits that there is a clear public interest in applying the policies as a coherent expression of what is sustainable development.

Housing Land Supply

110. NSC maintains it can demonstrate five years’ and certainly three years’ supply for the purposes of this appeal, and BPC accepts that.

Action being taken

111. BPC considers that the eSAP will help to deliver the key policies set out in the Core Strategy, which include the housing needed within North Somerset, and that it is well-advanced as it has been submitted examination. NSC considers the eSAP to be sound. While there are objections to it and these will be tested, recent supply has increased and BPC finds it hard to see what else NSC could do to deliver housing.

Countryside and the character and identity of the village

112. BPC considers that the policies in issue are all consistent with core principles and policies of the Framework, para 17(5), regarding countryside, confirm that planning must take account of the different roles and character of different areas, and also that they should recognise the intrinsic character and beauty of the

⁵⁰ CD8.7

countryside. Whilst BPC acknowledges that this is not the same as protecting it for its own sake, it considers it to be it is a protective principle; the positive attributes of the countryside should be protected. The role and character of different areas, in BPC's view, includes the role and character of countryside in providing the rural setting for villages, and maintaining the settlement pattern. The 'intrinsic character and beauty' of the countryside is that which gives the countryside its essential and true characteristics, which BPC considers are its openness, agricultural use, and rural character and appearance, which are exhibited at the site.

113. The development plan clearly defines its policies in the view of BPC:

1) Core Strategy Policies CS12, CS14 and CS32 are broadly consistent with the Framework, and the appeal site is open, undeveloped, rural and agricultural land exhibiting precisely the intrinsic character and beauty that are recognised in the Framework. Thus the application of these Policies to the site is consistent with the Framework; and

2) DMPP Pt1 Policy DM10 seeks to protect and enhance the quality and distinctive qualities of the landscape, and in particular proposals should be carefully integrated into the natural environment and reflect the identity of local surroundings, whilst minimising landscape impact. Policy DM25 seeks to protect and enhance the existing public rights of way network and Policy DM32 seeks to ensure high quality design of buildings. These policies are entirely consistent with the Framework.

114. BPC also maintains that the Backwell Settlement Boundary is consistent with the plan which NSC considers sound to meet its development needs, and forms the basis of the application of its policy, such that NSC must consider that boundary to be consistent with national policies, including to meet its full, objectively assessed needs for housing in balance with recognising the intrinsic character and beauty of the countryside.

Backwell Neighbourhood Plan

115. BPC maintains that the NP must be read as a whole, and that it is framed explicitly to identify relevant issues and objectives, as well as provide the policies for ensuring the protection of identified positive contributors to village character and the needs/aspirations of the community. Policy Development 1 explains that housing development in Backwell which is at a level appropriate to the size and character of the settlement will be supported, while Policy Development 4 explains that significant development of agricultural land that has been demonstrated to be necessary should also demonstrate that it prioritises the use of poorer quality agricultural land over the use of higher quality agricultural land.

116. The NP Examiner was made aware and was presented with evidence that there would be a need for increased number of dwellings to be delivered in the district, but he confirmed that it satisfied the relevant tests and recommended that the NP could be made without the need to identify higher levels of development. The NP is entirely consistent with the Framework and up-to-date in relation to these policies and their purposes. Therefore, BPC considers that any concerns are with the delivery of housing supply at a district level.

Character and appearance

117. In order to assess the effect that the scheme will have on the character and appearance of the area, BPC considers that it is necessary to understand and identify the role and function that the site serves in combination with the quality and contribution of the site in landscape terms. There is no dispute that the development will create some harm. BPC says that it would be significant, especially when considered at a local level. Indeed it is accepted in the evidence of the appellant's landscape witness, Mr Cooper, that taken from viewpoint 1, on the north-west public footway entrance to the site, there would be direct views of the new housing and also of the new link road that will dissect the fields. Those effects are considered to be 'adverse and important' but it is suggested that these will reduce to moderate importance/important 15 years after planting.
118. While it may not be at the centre of the village, the site has been described by BPC and the local residents as being the 'treasure in the heart of the village' and as a 'rural oasis', and it 'undoubtedly provides a rural setting that positively contributes to and enhances the character and identity of the village'. The scheme's effect on the character of Backwell would, according to BPC, be felt not only in the way the community operates and perceives itself but also the visual impact. It also says that the evidence from the local residents is that Farleigh Fields are regarded and have been used extensively without challenge, as open space for recreational purposes as well as being used as part of the public right of way the route which forms part of the Backwell Round.
119. BPC considers that the visual impression upon entering Farleigh Fields from Farleigh Road is one of passing from and away from the busy road into open countryside; an impression which remains until the higher ground is reached. Along with the sense of being in the countryside, there is also the sense of tranquillity. The peace and tranquillity afforded to the fields by residents and the value that they place upon this countryside and their relationship with it was well documented, in the view of BPC, during the course of the inquiry by the residents. Once the role of the site is taken into account, the proposal's impacts can be established; the fields and their surrounds are clearly sensitive to residential development as a result of its particular role as village setting, and this is precisely the role that BPC considers that the NP seeks to protect.
120. The value of objective assessments is that it can help place the site in context by reference to the role it plays in relation to the settlement and the countryside, and the extent to which in visual and landscape terms it is characteristic of the wider countryside. BPC says that the valued character of this setting, and which is characteristic, is encapsulated in the NP, and that once the proper role and character of the site is understood, then the impacts of its development are seen as unacceptable.
121. However, BPC considers that the assessment undertaken in the LVIA⁵¹ fails to recognise that proper role, character and function of the site - while it emphasised the quality of the landscape, the magnitude of that change was then not addressed before the conclusion reached that the significance of the effect of appeal development on the site was considered to be low/insignificant. In BPC's opinion the assessment fails 'a common-sense test', and it is clear that the initial

⁵¹ CD11.2

assessment of role/sensitivity and then magnitude has gone awry; the issue concerns a failure to identify the rural character of the site, its openness and the value of the fields both in landscape terms but also in terms of its function. The significance and degree of the change that would occur would, in BPC's view, fundamentally change the character of the site and how it is used.

122. There would also be visual and perceptual effects, and BPC considers that there will be significant harm in landscape and visual terms experienced at close proximity to the site. The experience of the use currently afforded by the many frequent users of the public rights of way will invariably deteriorate, and the site would no longer display qualities of calm and tranquillity, of being an oasis and bringing a sense of calm.
123. The site and the surrounds would, in BPC's opinion, be more sensitive to any change because of the way the fields are used by the public engaged in recreation. The site forms part of the definitive footpath network and the public have regularly deviated from those paths without challenge. BPC says that there is no suggestion that this current use is likely to be brought to an end, and 'as seen on site' there are views of it from public and private viewpoints overlooking the proposed development.
124. In BPC's view the proposals seek to introduce an inappropriate scale and type of development on the site which would result in inappropriate and harmful urbanising effects. Whilst assessed simply as landscape character impacts the effect is considered by the appellant to be of borderline or minimal significance, when considered in the context of the identity of the village, as should have happened, the impacts are significant in the opinion of BPC, and it adds that these issues must be judged to reflect the role of the site in contributing to the character and identity of the village of Backwell.
125. BPC seeks to have Farleigh Fields designated as LGS, as it sees them as meeting the necessary criteria in full: they are in reasonably close proximity to the community they serve; they are demonstrably special to the local community and hold particular local significance; are local in character; and do not amount to an extensive tract of land. NSC supports BPC's aims, albeit it does not accept that all of the fields should necessarily be designated as LGS. If Farleigh Fields were designated as LGS, this would afford the land 'special protection'. BPS says that a key concept of LGS is that the land is demonstrably special and thus can only remain the case if there is sufficient surrounding undeveloped and open land to create this special nature, in terms of beauty, tranquillity and affording a haven for wildlife. However, it is proposed to construct an access way, Sustainable Drainage System (SuDS) infrastructure, a play area and associated infrastructure works over the land that would be LGS, in conflict with that designation and the field would effectively amount to no more than a green corridor in the view of BPC. It firmly of the view, therefore, that there is a direct conflict with the aims of such designation and the proposed use of the fields in the manner proposed.
126. BPC considers that the construction of those works and elevated access way would be inconsistent with the proposed LGS status, dominate the landscape and create visual and perceptual harm, be out of keeping with the rural feel and peaceful nature currently afforded by the land and create a possible safety hazard and conflict between users of the right of way and the access way. The that public footpath would be dissected in the normal meaning of the word and

this would in itself amount to a harmful impact on it as a right of way contrary to Framework para 75 and DMPP Pt1 Policy DM25 which seek to protect and enhance footpaths. Whilst improved accessibility may occur if the footpath were to be resurfaced, the visual impact that would result would in the opinion of BPC conflict with its rural feel and amount to an urbanising impact.

127. When properly assessed and placed alongside the policies that have been considered above, BPC considers that the appeal proposal:

- 1) Fails to take proper account of the role and character of the site within its landscape context, and fail to recognise the intrinsic character and beauty of the countryside in the terms of Framework para 17(5);
- 2) Breaches NP Policy Development 1 as it is too large in this location to be considered of a level commensurate with the size and character of the settlement, which is to be read alongside Core Strategy Policy CS32;
- 3) Conflicts with Policy CS32 in relation to Service Villages requires that 'sites outside the Settlement Boundaries in excess of about 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans';
- 4) Is additional to the NP's planned development of around 100 dwellings by 2026. While that is not a cap, BPC says that 320 new dwellings would represent a significant and substantial increase over the 1,680 existing dwellings in Backwell main village. This scheme, if permitted, would be the largest development for over 50 years. There is thus, in the view of BPC, a direct conflict with Policy CS32 that envisages only 'small scale development' in Backwell, 'proposals for small scale development appropriate to the size and character of the village which respects the character of the village and supports or enhances the village's role as a local hub for community facilities and services, employment and affordable housing, including public transport will be supported'; and
- 5) Is neither small in scale nor appropriate when considered in the context of the character of the village.

Loss of best and most versatile agricultural land

128. The site falls into the category of BMV. Framework para 112 and NP Policy Development 4 seek to encourage the prioritisation of poorer quality agricultural land over the use of higher quality. This scheme fails to comply with this aims in BPC's view. The appellant suggests that around 12ha of the land would remain capable of reverting to agricultural use, and while BPC accepted during the Inquiry that the land not proposed for housing would not be sterilised, it would be unlikely that it would revert to an active agricultural use and as such BPC considers that the site would cease to remain in active agricultural use.

Infrastructure and Services

129. DMPP Pt1 Policy DM70 seeks to allow development where the necessary infrastructure to support it is in place or can be provided in a timely manner through developer funded contributions. BPC says that the position in relation to education is that the appellant accepts existing infrastructure is inadequate and so proposes 'necessary' planning obligations, and the issue that arises is whether that infrastructure would be provided in a timely manner.

Education

130. BPC submits that the appellant has not provided and neither was it required of the appellant to produce evidence in support of the delivery of educational infrastructure, indeed:

(a) There are no identified plans for the provision of any permanent new school or infrastructure within Backwell; and

(b) Consequently village children are unlikely to be able to be educated in the village, at least during the short to medium term while the infrastructure is provided to cope with the development. There are already examples of schools being oversubscribed in this way and concerns raised by interested parties.

131. BPC does not consider that the appellant has provided any evidence as to what expansion works, if any, have been identified, when these may take place, or how much they may cost, and this was not requested by any party. However, in the view of BPC the justification for the education contribution is silent on what expansion works will be undertaken, when or at what cost and the planning obligations do not identify the particular capital project and no costings of a project have been provided. BPC says it cannot have any confidence or certainty that the education funds will be spent within the parish of Backwell as the S106 Agreement simply requires the money to be spent within the vicinity of the site, which could fall outside the Parish.

132. It is not sufficient in BPC's opinion to say that a contribution is made; the school is full or near to capacity and permitting further development would mean that children cannot be educated in the village would promote unsustainable transport, and does not promote inclusive communities in the terms of Framework para 69. BPC sees this as the developers simply paying funds based on a standard formula, with no evidence having been provided to indicate that the impacts of the development would be mitigated, or that additional capacity sufficient to meet the needs of the community is likely to be provided.

Highway concerns

133. Access to developments must be safe in the terms of Framework para 32. BPC considers that the issue in this case is the intensification in the use of the A370 and the dangerous levels of congestion experienced in Station Road combined with the cumulative impacts that would stem from the appeal development and other development sites. Whilst appreciating that the impact on the highways may not be considered to be 'severe' and thus was not considered to warrant a reason for refusal, the impact on the highway, in BPC's view, would be considerable and sufficient to create additional pressures / stresses on the network and the rat runs with the consequential concerns / frustrations that would follow.

134. The NP recognises that the delivery of infrastructure improvements at Backwell crossroads is extremely challenging and that increasing its capacity could have adverse traffic generation impacts and other adverse consequences. Accordingly BPC considers that there is potential for conflict between users of the highway and safety concerns.

135. In BPC's opinion, the local evidence shows that typically there are significant queues at peak morning and evening times and any increased flow of traffic from

the site would increase these queues adding to the frustration experienced by the road users. Backwell has very little employment so the majority of any new residents would have to out-commute. BPC's view is that the experience of existing residents and human nature is such that irrespective of any Travel Plan, the majority would use private cars, despite the apparent availability of public transport, thereby adding to the existing traffic congestion.

136. The junction at the village cross-roads is equipped with a system that is responsive to traffic conditions and optimises the flow of traffic at the junction, such that BPC sees no further improvements to traffic flow being possible to that junction. The appellant's short-term modelling to 2019 identifies only short-term effects and overlooks, in the opinion of BPC, the forecast tripling of traffic queues at the cross-roads in the longer term, which would affect Backwell for many years after the planned development would be complete. That tripling effect by 2026 was predicted in a TPA study used to inform the NP before the effect of the appeal proposals, which would only worsen the situation in BPC's view.

Balance and Conclusions

137. BPC has set out what it considers to be the proper approach to the determination of the appeal proposal including that if it is found to accord with the development plan it should be granted permission, but that that is not the case as its policies are breached. It invites the Secretary of State to accord weight to the competing considerations for and against in light of its submissions as summarised above.

138. An issue of particular significance to BPC is the weight to be given to the NP, which it considers is up-to-date and Framework compliant, and that the only issues of weight arise as a result of the application of Framework para 49, and that paras 184, 185 and 198 remain a critical part of the para 14 balancing exercise.

139. BPC considers that the WMS strongly endorses the principle that development that fails to accord with an up to date and made neighbourhood plan should be refused even where the district is unable to identify a five year housing land supply at the district level. It says that the WMS makes clear:

- 1) Where an application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted; and
- 2) Building on proposals to further strengthen neighbourhood planning through the Neighbourhood Planning Bill, the Government makes clear that where communities plan for housing in their area in a neighbourhood plan, those plans should not be deemed out of date unless there is a significant lack of and supply for housing in the wider local authority area.

140. BPC says that the WMS contains an operative part which disapplies Framework para 49 where three considerations are met, the first of which is met as the WMS is less than two years old. The second requires the NP to allocate sites for development, and BPC considers that it has clearly demonstrated that there were two separate and distinct processes in the consideration of NP development sites.

141. BPC refers to NP Evidence Base G⁵² and maintains that at G.40 it shows that

⁵² CD5.16

the NP 'identified' sites put forward by 17 developers and that was followed by an objective process as described at G.41 to determine the most appropriate sites to be allocated and 5 sites were proposed at G.59. It also refers to G.60 point 4, which uses the words 'allocate' and 'allocation' but acknowledges that these words are not used in the 'made' plan. While it accepts that there is no policy in the NP that refers to the allocation of sites, BPC considers that it is clear 'on a plain reading of the NP' that five sites, A to E, were allocated as outlined on the plan referred to in para 8.9 of the NP. Furthermore, what was proposed in the NP in terms of those allocated sites is such that all of those have now come forward, albeit at various stages, for development.

142. BPC considers that even if the Secretary of State concludes that the NP does not allocate sites, it is nevertheless up to date and provides for housing in a permissive way that is consistent with meeting greater housing needs; it is not capped. BPC says that on that basis the WMS is consistent with Framework paras 184, 185 and 198 and endorses the giving of significant weight to breaches of the NP, which is also endorsed in the White Paper. BPC maintain that this is at odds with the applicants' submissions that in the circumstances that exist in this district and parish the development plan policies should be given significantly reduced weight as a result of para 49 or for any other reason. It adds that in many cases breaches of the NP are given very substantial and indeed determinative weight against the acknowledged benefits of the provision of market and affordable housing.

143. BPC acknowledge that the White Paper is a material consideration, but considers that there remain a number of stages including consultation before it generates substantive changes to national policy or the law, and the weight given to it must reflect this. It considers that certain themes are apparent:

(1) The Government wishes to boost housing supply, consistent with the Framework while the message is to build the right homes in the right places;

(2) The plan-led system remains central and there will be increased action to ensure authorities have up to date plans;

(3) The role of local communities in planning for their areas is endorsed - provide greater certainty for authorities that have planned for new homes and reduce the scope for local and neighbourhood plans to be undermined by changing the way that land supply for housing is assessed;

(4) Infrastructure must be provided at the right time in the right place; and

(5) Encouraging housing that meets the needs of the future population.

144. Although in its opinion the weight to be afforded to the White Paper is limited, BPC considers that it confirms the importance given to neighbourhood plans by the WMS and the Framework. In BPC's submission it is entirely consistent with the NP approach. As part of its overall conclusion, BPC states that one of the key aims, as expressed in the NP, at para 4.6, is that 'residents wish to safeguard Backwell for future generations as an attractive place to live with a sustainable village-feel in close proximity to the countryside.'

145. For all of the reasons given above BPC submits that the proposals are contrary to identified policies within the development plan including identified policies within the NP, it would undermine and conflict with the clear vision and aspirations of the local community as properly expressed through an up-to-date

and made neighbourhood plan, and applying the Framework, the NPPG, and the WMS planning permission should be refused.

146. While Framework para 49 may be triggered due to housing land supply at the district level, for the reasons it has identified BPC considers that the development plan policies should still attract significant weight and policies in the eSAP identify the same core purposes as the existing development plan. In the language of the WMS and the Framework, BPC considers that the local community has done exactly what it should and made the NP which provides its vision for the area, and which identifies the right types of development for that community. The shortfall at district level, if any, is not significant in the opinion of BPC and should not in any event frustrate the proper use of neighbourhood plans as a powerful tool in the decision-making process.

147. When the balance is properly addressed BPC considers that it is clear:

- 1) The appeal proposal is contrary to the development plan, including an up to date neighbourhood plan, and the material considerations in support of the proposals put forward by the applicant do not indicate that permission should be granted having regard to section 38(6) of the Act; and
- 2) As a result of those breaches, and the harm caused, it does not amount to sustainable development, but rather when balanced in full, the harm significantly and demonstrably outweigh the benefits.

148. For these reasons, BPC requests that the appeal be dismissed.

The Case for Charles Church Developments Ltd

The Policy Context

149. The appellant considers that the components of the statutory development plan are agreed as set out in the SoCG. Core Strategy Policy CS14 provides the Service Village minimum requirement of 2,100 homes to be delivered during the plan period. This has increased from 805 homes since re-adoption following examination of the remitted policies. The appellant says that the development plan has yet to determine where this requirement will be accommodated amongst the nine Service Villages – an exercise that will require an assessment of their relative sustainability credentials as they are not the same. In its view the context in which Policies CS14 and CS32 were examined was, among other things, the approach to indicative levels appropriate for windfalls at each tier of the settlement hierarchy to increase flexibility⁵³, i.e. about 25 for the Service Villages.

150. The appellant's view is that the minimum requirement for the Service Villages has implications for the existing Settlement Boundaries. Policy CS14 retains the NSRLP Settlement Boundaries as adopted in 2007 '... pending any alterations as part of any future Local Plan or neighbourhood Development Plan...' ⁵⁴. The NSRLP only planned for development up to 2011 and the appellant sees, as a consequence, the Settlement Boundaries as being effectively time expired, not being intended to meet the needs of the adopted Core Strategy and that they will necessarily have to flex to accommodate allocations to address the requirement.

⁵³ CD5.5 paras 35-39 & 68-70

⁵⁴ CD5.3 para 3.199 – also see paras 3.197 & 4.89

151. The appellant accepts that its scheme conflicts with the 'about 25' limitation in Policy CS32 and has not been brought forward as an allocation through Local Plans or the NP, because the proposal is for 220 dwellings thereby exceeding the 'windfall threshold' and it is not an allocated site. However, both CS14 and CS32 expressly anticipate that to meet the minimum Service Village requirement there will have to be allocations. It says however, in the absence of an adopted SAP the development plan is presently silent as to where this requirement is to be met. It also notes that when examining the remitted Core Strategy policies the Examining Inspector increased the Service Village requirement from 805 to 2,100 but the spatial strategy remained unchanged, and that while he endorsed the approach that larger sites should be allocated through the local plan process that Inspector made no comment regarding upper limits or the scale of allocations⁵⁵.
152. In the appellant's view Policy CS32 is intended to assess sites of less than about 25 dwellings and provides useful development control criteria and, aside from the acknowledged conflict, the only remaining issues in dispute relate to bullet points 1 and 4. These relate principally to form, character and landscape setting, which are addressed below. The appellant does not consider that the Policy requires that all development at Services Villages must take place within Settlement Boundaries or that development proposals outside them must be refused, nor that there is a percentage restriction or limitation on the increase of dwellings to be accommodated at the Service Villages. The mathematical approach advocated by NSC's planning witness Mr Tate⁵⁶ is simply wrong in the appellant's view, Policy CS32 does not limit each village to 25 houses (the 'about 25' relates to the scale of a windfall site). Similarly, in the appellant's opinion, his suggestion that a 'policy compliant' approach to CS32 would represent an increase of only 1.5% at Backwell is also erroneous⁵⁷. The appellant says that the obvious flaws to this approach are demonstrated by the simple fact that a limit of 25 per Service Village would only deliver 225 dwellings over the plan period, roughly 10% of the minimum requirement.
153. Irrespective of the housing land supply position, the appellant considers that the development plan is presently silent within the meaning of Framework para 14. The appellant refers to the South Oxfordshire case⁵⁸ in terms of whether or not the development plan is presently silent within the meaning of Framework para 14. In its view that judgment identified there was no distinction to be drawn between an argument that the policies in the development plan were silent because there was no DPD and the argument that the plan was out of date because there was no DPD. As held in the Bloor case⁵⁹, 'silent' within para 14 meant an absence of relevant policy, and consequently, in the appellant's view, it is a matter of planning judgement for the decision-maker to determine whether there is a body of policy sufficient to determine whether the scheme is acceptable or unacceptable in principle. In the South Oxfordshire case the local planning authority had no SAP and Gilbert J observed at para 95:

'...The question "how much housing does the Development Plan intend should be allocated in the period x to y" is not the same question as "where does the Plan

⁵⁵ CD5.5 paras 38 and 69-70 respectively

⁵⁶ CD15.5 para 8.1 on ward

⁵⁷ CD15.5 para 9.19

⁵⁸ CD18.22

⁵⁹ CD18.23

say that housing could or should be built?" In some cases, it can be the second question that matters. Whether it does so depends on the circumstances and is a matter for the planning judgment of the decision maker.'

154. The appellant says that in this appeal the minimum requirement for the Service Villages has been identified but the eSAP has yet to allocate where within the Service Villages that housing could or should be built. Therefore, in its view, the tilted balance in para 14 of the Framework is engaged irrespective of the housing land supply situation.
155. Policies CS14 and CS32 are acknowledged to be policies relevant to the supply of housing and therefore the absence of a five-year supply of deliverable housing sites Framework paras 49 and 14 in any event. It is the appellant's case that this will involve an assessment of the weight to be afforded to these policies as per the principles in the *Suffolk Coastal v Richborough Estates* case⁶⁰. That will be informed by the extent of the housing land supply deficit, which the appellant's planning witness Mr Hutchison described as 'dire'. The appellant's point in this regard is that these policies are clearly not providing the mechanism for delivering the number of houses that are needed right now. It also maintains that the deficit is also a 'stark demonstration' that NSC is failing to comply with the national policy imperative to boost significantly the supply of housing. When the development plan is looked at a whole and in the context of the increasing deficit then, in its view, there should be no need to await an allocation and consequently conflict with this element of the policies should be afforded significantly reduced weight.
156. The weight to be afforded to the eSAP is reduced, in the appellant's opinion, due to the significant number of objections and identified concerns of its Examining Inspector. There is no prematurity objection raised by NSC. The appellant believes that it is likely that NSC will have to consider further sites and in that context it says that the site clearly represents an opportunity. It also considers that the appeal scheme should be viewed in the context of Backwell's acknowledged sustainability credentials when compared with the other Service Villages – in cross examination Mr Reep, NSC's planning policy witness, referred to Backwell as being 'top of the pile'. The appellant says that much time was spent during the Inquiry considering NSC's Comparative Assessment of Rural Settlements⁶¹ that identifies the most sustainable locations for development outside the main towns. The RAG approach employed therein allows for a consistent approach to be taken across all nine Service Villages, as agreed by Mr Reep, and Backwell tops that list in the appellant's view.
157. The appellant also says that, as acknowledged by Mr Reep, when determining where to allocate the Service Village minimum requirement, the first step would be to allocate development to the best and most sustainable locations, this being consistent with Core Principle 11 of the Framework. This was, in the appellant's view, graphically demonstrated by its planning witness in evidence when he went through the Policies Map⁶² to illustrate the constraints in the other Service Villages. The appellant says that the next stage is to determine the sustainability credentials of the site. In the context of the site, the appellant sees the

⁶⁰ CD18.4

⁶¹ CD5.8 and CD5.8a

⁶² CD5.21a, b and c

site-specific sustainability credentials as impressive including the absence of any heritage, public right of way, highways, ecology or BMV related refusal reasons, and the site is neither within Green Belt, floodplain or any landscape designation, although elsewhere within Backwell development is restricted by constraints including Green Belt and floodplain.

158. Regarding the NP, the appellant's primary contention is that the appeal scheme does not conflict with its policies on the basis that Policy Development 1 supports housing development in Backwell which is at a level appropriate to the size and character of the settlement. Character is not limited to the visual considerations in the appellant's opinion, it is broader than that and will include, among other things, its role as a Service Village and how it functions. According to the appellant, Backwell's position as the most sustainable of the Service Villages indicates that as a settlement it represents a good location for housing. The appellant considers that when the site and scheme are then assessed they confirm that this permissive policy is satisfied; in particular there is no cap or limit on the scale of housing at Backwell.
159. The WMS is a 'red herring' in the opinion of the appellant because there is no conflict with the NP in any event and, even if it was engaged, tests 2 and 3 are not met, firstly because the NP does not allocate sites as it contains no allocation policies. Whilst the NP was being progressed its Steering Group was assisted by NSC and, the appellant considers it of particular note that as part of that process NSC twice told the Steering Group prior to the examination of the draft NP that 'there should be a specific policy which allocates development sites...' ⁶³. The NP examiner expressly noted that 'the Policies of the Neighbourhood Plan do not designate, or allocate sites and the wording should reflect this fact' ⁶⁴ and consequently recommended changes to the draft. The appellant says that those changes were subsequently adopted in the 'made' plan and considers that it is also worth noting that two of the sites referred to in the NP, Moor Land and Etrick Garage, were then identified as having potential viability issues and the uses favoured by their owners were not then known ⁶⁵. Such uncertainties would, in the view of the appellant, ordinarily preclude allocation of those sites as demonstrated by the Toolkit produced by BPC during this inquiry ⁶⁶. The appellant say, moreover, the plan attached to the NP only refers to 'potential development sites'.
160. This is unsurprising to the appellant in view of the context in which the NP was being prepared. The appellant say as was acknowledged by BPC's witness, the Steering Group was planning to accommodate an element of the residual Service Village housing requirement of 805 homes rather than the 2,100 ultimately adopted, a 161% increase, and were only anticipating having to find sites for about 60 houses ⁶⁷. However, when the NP was examined the extent of that increased requirement was not known albeit that the examiner noted that '... District housing numbers will be considerably higher than previously thought' ⁶⁸ and accordingly, in the appellant's view, advocated the flexible and permissive Policy Development 1.

⁶³ CD17.3 para 5

⁶⁴ CD5.12 pages 30-31

⁶⁵ CD5.15 para 10.4

⁶⁶ CD18.7 page 7

⁶⁷ CD5.16 page 10

⁶⁸ CD5.12 page 10

161. The appellant says that the Policies map⁶⁹ confirms that NSC recorded Moor Lane as a safeguarded employment site while the other Backwell Sites are not shown. It adds that the eSAP refers to 'all' allocated sites but contains no reference to the NP⁷⁰. Furthermore, there is no reference to these sites being allocations in the LPA's Five-Year Housing Land Supply Paper April 2016⁷¹ and 'if only *allocation* could be stretched as far as that sought by NSC and BPC then we would all be millionaires' according to the appellant.

162. The third test for the application of the WMS is the three years housing land supply and in the appellant's view that test is also failed. The appellant also considers that the WMS is only concerned with Framework para 49 where there is no requisite five years housing land supply. It adds that where, 'as here', the development plan is 'silent' as to where housing could or should be built then the tilted balance in para 14 of the Framework is engaged in any event.

Housing Land Supply

163. There is an agreed Schedule / Table document that has been prepared for the inquiry and the different positions are as follows⁷²:

- Backlog 2,498⁷³, but predicted to be 2,765⁷⁴ at April 2017
- Appellant 2.73 years (-4,217 dwellings)
- LPA 5.05 years (+86 dwellings)

164. The appellant considers it important to place this issue into 'its proper context'; it says NSC is now contending that it can demonstrate a Framework compliant supply of housing land although its housing witness, Ms Richards, acknowledged that it was 'marginal' – the appellant called it 'wafer thin' - and only on the basis of a 5% buffer, and her position has decreased since giving that oral evidence concession. It also said the latest five year housing land supply evidence was published in May 2016 and relates to the supply as at 1 April 2016, although NSC's trajectory was not available until the Banwell inquiry.

The Buffer

165. The appellant says that NSC contends for the 5% buffer solely on the basis that it was suggested by the Examining Inspector for the remitted policies of the Core Strategy – the appellant referred to this as tantamount to defying gravity. It added that Ms Richards accepted in cross examination that that Inspector did not interrogate the details of the five years housing land supply, that his position was derived from the hearings in June but asserted he did consider the framework and methodology. Since that examination, the appellant adds, the housing land supply in the district has been tested and NSC has been found to have a 'significant deficit'.

166. Five year housing land supply was subsequently tested at both the Sandford⁷⁵

⁶⁹ CD5.21c

⁷⁰ CD5.7, page 17

⁷¹ CD6.1

⁷² The appellant also states that it nonetheless appears that NSC has subsequently identified another position to the eSAP examining Inspector with an even smaller surplus

⁷³ HLS SoCG para 2.8

⁷⁴ CD14.7 para 104

⁷⁵ CD8.2 paras 24 and 25

and Banwell⁷⁶ appeals and both Inspectors confirmed the absence of a five year housing land supply and that the appropriate buffer to be applied was 20% due to persistent under delivery. The Banwell Inspector determined the housing land supply to be no greater than 4.2 years whilst the Sandwell Inspector did not conclude on a precise figure. The appellant adds that since then NSC has accepted that it is unable to demonstrate a Framework compliant supply of housing land and that the appropriate buffer is 20% for the purposes of evidence at appeals⁷⁷. The findings of these Inspectors and the approach taken by NSC are, in the appellant's opinion, material considerations in the determination of this appeal, as is the need for consistency of approach by NSC.

167. However, the appellant says that NSC has taken a contradictory approach to its stance in this appeal as recently as March 2017. The following applications were considered by NSC members on the basis that it was unable to demonstrate a five year housing land supply and that a 20% buffer should be applied. The following planning applications were granted by NSC's Planning and Regulatory Committee in this context⁷⁸:

- Application Ref 16/P/1521/O - Land at Wrington Lane, Conglesbury, on 8 February 2017;
- Application Ref 16/P/152744/OT2 – Land at Wolvershill Road, Banwell on 8 February 2017;
- Application Ref 17/P/0023/F2 – Cothill, Station Road, Sandford, Winscombe on 8 March 2017; and
- Application Ref 16/P/2490/O - Withydale Farm, Weston Road, Congresbury on 8 March 2017.

168. The appellant said that NSC's housing witness, Ms Richards, agreed in cross examination that the last time the issue of the appropriate buffer was tested was at the Banwell appeal inquiry and that as there has been no material change in circumstances since that time the 20% buffer should still apply. It added that that this approach is also entirely consistent with the acceptance by NSC that it has not met the annualised housing requirement⁷⁹ of the adopted Core Strategy in any one of the previous eight years and will not meet it next year⁸⁰.

169. The appellant also considers that NSC's current approach of using historic requirements, including 'the unlawful requirement' prior to the judicial review to the previously adopted Core Strategy to be flawed. To assess delivery against requirements rather than needs simply excuses under-delivery in the eyes of the appellant. The appellant's evidence is that, in any event, there is still a record of persistent under delivery using any period and any definition. It adds that the LPEG approach⁸¹ to assessing the appropriate buffer is not policy, and it has not been replicated in the Housing White Paper, yet even that approach shows a record of persistent under delivery in North Somerset.

⁷⁶ CD8.3 para 27

⁷⁷ As was accepted by Ms Richards in cross examination these were the *Wentwood Drive* appeal (8 November 2016); the *Station Road* appeal (5 December 2016); and the *Oldmixon Road* appeal (23 December 2016).

⁷⁸ CD6.4 to CD6.7 inclusive

⁷⁹ The appellant states "the need being the appropriate measure as indicated by Lewis J in the Cotswold case" - see CD16.2 para 47

⁸⁰ HLS SoCG para 2.8

⁸¹ DC18.25 para 4

170. The appellant states that in making an assessment of the five year housing land supply the decision maker will have to determine whether the sites contended for in NSC's trajectory and disputed by the appellant are deliverable within the meaning of Framework Footnote 11 and the relevant NPPG having regard, among other things, to the following principles and considerations.

Lead-in Times

171. The appellant considers that there will 'obviously' be some delay between the grant of permission and delivery of houses and that this will be affected by the nature of the permission, whether outline or detailed as well as site specific issues. It also says that its housing witness, Mr Tiley, has provided a robust assessment of the average lead-in times in North Somerset⁸² derived from the identified sites which indicates that on average, the time between the validation of an outline application and first delivery is about 5.5 years, which he then compared with other known studies⁸³ to ensure that his assessment is realistic. It adds, in contrast Ms Richards for NSC relies on 100% delivery in respect of large sites on a trajectory that the appellant maintains is wholly unrealistic, as supported by the alternative trajectories in block graph form attached to the HLS SoCG, and does not take account of past trends. According to the appellant, her assertion that government and NSC proposals⁸⁴ will speed up determinations has 'no track record' in the appellant's opinion and as discussed during the round table session on housing supply she still assumes some sites will achieve completions this year despite the absence of any implementable permissions or applications.

Sites which post-date the base date

172. There is, in the appellant's view, now a significant body of appeal decisions in which Inspectors have indicated that such an approach is not appropriate in the absence of proper accounting - if such sites are to be included then account must also be taken of the housing requirement that has accrued during the same period⁸⁵. In this appeal the agreed base date is 1 April 2016. Whilst Ms Richards has identified sites that have accrued since that date, the appellant says that she has not factored in the increased requirement and increased backlog. Consequently, in the appellant's opinion, whilst those sites will inevitably be included in the trajectory they will address the needs from the next base date and not the needs as at 1 April 2016.

Sites in operational use

173. The NPPG indicates that availability requires an assessment of the operational requirements of landowners, and the appellant adds that to comply with Framework Footnote 11 a site that is currently subject to the operational requirements of landowners should not be considered available now and therefore should not be considered deliverable.

Rural Buildings and Empty Homes

174. Despite agreeing that rural buildings are a finite resource, the appellant says

⁸² CD14.2 p31 Table 8.3

⁸³ CD15.2 Appendices 17 & 18

⁸⁴ CD17.1 para 5.10

⁸⁵ CD8.9 paras 11-13, CD8.10 para 30, CD8.12 paras 20-24

that Ms Richards relies upon a constant supply from this source albeit over a limited period, while its witness Mr Tiley has demonstrated that there is a marked downward trend of deliveries from this source. The appellant considers that it is simply not realistic to assume the constant delivery rate contended for by NSC.

Empty Homes

175. The NPPG indicates that an empty homes allowance should be included in the trajectory only where this has been robustly tested through an examination. Ms Richards for NSC accepted during cross-examination that such an allowance had not been robustly tested in North Somerset. Furthermore, in the appellant's view, the approach adopted by her is unrealistic given that North Somerset already has the 7th lowest number of empty homes in the country out of 326.

Strategic Allocations

176. The appellant considers that specific matters discussed during the housing delivery round table session need to be factored into the delivery trajectory for these sites, including the 'failure' of NSC to take account of the most recent delivery assessments provided by Persimmon and Mead Realisations to the Weston Villages Joint Delivery Review Board⁸⁶ and the delivery problems associated with phase 2 of Haywood Village concerning the 1.5 jobs per dwelling and other viability issues. Moreover, the assumed delivery rates must, in the appellant's opinion, be viewed in their proper perspective - the assumed delivery rates will exceed anything ever achieved within the district⁸⁷ or on any site nationally⁸⁸. The appellant maintains that in view of NSC's delivery track record that is 'more akin to fantasy than a realistic assessment of housing delivery'.

Emerging Allocations

177. The appellant considers that reliance upon emerging allocations in the eSAP needs to be viewed in the context of Framework para 216 and that 'significant' objections that have been lodged. It also maintains that to this must be added the concerns raised by the eSAP Examining Inspector and that previous Inspectors have expressed caution about including the delivery of such sites⁸⁹ as have the Courts⁹⁰. Specifically, some of the sites relied upon as emerging allocations by NSC, namely Engine Lane, North West Nailsea and Moor Road, are all outside existing Settlement Boundaries and of a scale that conflict, in the appellant's view, with existing development plan policy. The appellant considers that the reliance on such sites requires that there are material considerations which suggest that applications on these sites should be approved, such that this would require that either NSC accepts that there is not a five year housing land supply or that it is prejudicing the appropriate plan-making process by relying on sites which have not yet been subject to examination.

Small Site Lapse Rates

178. Although this would only affect some 89 units, the appellant's witness Mr Tiley felt that it is important that this figure is mathematically sound and that in his

⁸⁶ The Board includes landowners and developers of the Weston Villages development and NSC

⁸⁷ HLS SoCG para 2.18

⁸⁸ CD14.2 para 8.105

⁸⁹ CD5.5 para 21; and CD15.2 Appx 29 at para 47, Appx 30 at para 21, and Appx 6 at para 32

⁹⁰ CD15.2 Appx 31 at para 35

opinion NSC had wrongly calculated the lapse rate in respect of year 1 and calculated it to outstanding permissions only - this approach fails to account for the fact that permissions usually last for three years and consequently NSC's figure is artificially reduced. He added that NSC has calculated the lapse rate in a way which is inconsistent with the way in which it is applied and also said that his approach is consistent with that of other local planning authorities⁹¹.

179. For all of these reasons, in the appellant's view, Mr Tiley's assessment of the housing land supply within the district should be favoured, which demonstrates that NSC is unable to demonstrate a five years or a three years housing land supply in whichever way the latter is to be assessed.

The effect of the proposals on the character of the settlement of Backwell

180. When considering this issue, in the appellant's view, it is important to examine the reasons for refusal. The first contends that the scale of the proposal would have a detrimental impact upon the character of the area. This is echoed in the second reason for refusal, which confirms that it is the scale - 220 dwellings - that is out of keeping with the overall character of the village and will harm the quality of its landscape setting and edge of the village.

181. Such details as are provided in these refusal reasons must, in the opinion of the appellant, be considered in the context of the site. NSC's own evidence acknowledges, among other things, that the 'site is enclosed by existing development'; that the visual impacts 'would be largely localised to the site itself and limited to its immediate surroundings'; and '... no objection can be raised to the impact upon the 'wider landscape' character...'⁹². The SoCG confirms that the site is not located in the Green Belt and not directly affected by any adopted landscape, ecology or heritage designations⁹³. Moreover, the appellant says, there is no objection to the effects of the appeal proposals on either the wider landscape or the wider landscape character areas.

182. The appellant states that the alleged impact is upon the immediate character 'which NSC claims is rural despite being surrounded by houses'. The evidence of the appellant's landscape witness, Mr Cooper, is that the site is semi-rural, which the appellant considers is consistent with the Landscape Character SPD, which notes the noise and nuisance of the A370 as 'a dominant presence'⁹⁴ and the 'ubiquitous ribbon development along major roads which weakens the rural character of the otherwise largely pastoral landscape'⁹⁵. The appellant maintains that this reflects the wider character of Backwell as evidenced by its historic pattern of growth. Mr Cooper illustrated the evolution of Backwell by reference to the historic maps of the settlement⁹⁶, in particular:

- Between 1883 and 1902 West Town, Backwell Church Town and Farleigh were completely separate, and with separate settings. Although the site is related to Church Town, there was and remains no relationship between the site and West Town or Farleigh;

⁹¹ CD14.2 p.36

⁹² Quotes from CD14.5 paras 2.1, 8.27 & 8.33

⁹³ SoCG para 3.6

⁹⁴ CD1.27a App.8 p143 of the Area J5 Rolling Valley Farmland.

⁹⁵ CD1.27a App.8 p.144 'Character'.

⁹⁶ CD15.4 App.1 L5

- By 1930-1932 ribbon development had already started along the road to Nailsea and along Dark Lane;
- Between 1932-1960 there was a period of considerable ribbon development. Houses had been built around the periphery of the triangle comprising Dark Lane, Church Lane and Farleigh Road. These maps indicate that by 1960 the housing in Church Town was physically linked to Farleigh;
- The 1980 map illustrates the extensive development period that had taken place since 1960 between Dark Lane, West Town and Nailsea including the new school and further development around the triangle; and
- The most recent map is dated 2005 and shows how development has now linked all three hamlets into Backwell. Farleigh has even become Farleigh Backwell. Although the site is still partially in the setting of Church Town the proposals are agreed to have no effect upon that hamlet.

In Mr Cooper's view the present day settlement of Backwell has 'no landscape logic'. The appellant considers it to be largely a modern settlement with some historic parts that is the product of ribbon development and infilling and adds there is no harm in this, it is simply the way the settlement has developed.

183. In the appellant's view this would necessarily have provided the context for NSC's Landscape Officer's assessment of the appeal scheme and informed his consultation response⁹⁷, which followed 'extensive pre-application discussions' during which it was agreed that the application LVIA followed the appropriate methodology and had assessed all relevant viewpoints⁹⁸. The appellant asks for the following comments from that consultation response to be noted in particular:

- The housing would be visually contained at a lower level on either side of the central space;
- The site would only be visible from local viewpoints and, when seen at longer views, in the context of development; and
- Existing houses recede into background and the visual effects '...can be dealt with by mitigation.

184. The appellant also considers that NSC's Landscape Officer's consultation response undermines the weight to be attached to the subsequent allegations of landscape and visual harm relied upon by NSC. Firstly, reference has been made to the letter from Brandon Lewis dated 27 March 2015⁹⁹ - this pre-dates that consultation response. The appellant contends moreover that that letter concerns impact on landscape character as an important consideration in the decision-making process and it was not identified as such in the Landscape Officer's consultation response or in the case officer's subsequent delegated report. The Landscape Officer explained that 'The proposal avoids any adverse impact upon the Green Belt, the wider landscape and the setting of Tynesfield, and will be largely unseen from much of the village.'

185. Mr Cooper, for the appellant, explained that, whilst outline the appeal scheme has been 'landscape led' and followed a long period of discussion with landscape

⁹⁷ CD9.14 & CD9.15

⁹⁸ SoCG para 7.60

⁹⁹ NSC's appeal document ref. NSC 27

and other officers, including a reduction in extent based on landscape and visual guidance. The site comprises private land with two public rights of way. In the appellant's view, the residential development is restricted to the lowest and least visible land¹⁰⁰; no housing is proposed on the central field; no housing is proposed in the vicinity of the Conservation Area; the long views of the moors and the Mendips are retained; development is proposed within the less sensitive landscape character area J5 Rolling Valley Farmland¹⁰¹ as opposed to the more sensitive E6 Cleeve Ridge; the hedgerows and trees are to be retained, managed and replanted, particularly those on the western side and along the upper fields; lower building heights are proposed around the edges of the site; and residential amenity has been addressed through mitigation and set-backs. In the appellant's opinion these have been acknowledged by NSC's Landscape Officer.

186. In the appellant's view the design matters now put forward by NSC are a recent invention and not indicated in the officer's report, the refusal reasons or NSC's Statement of Case. The appellant considers that the premise was always that the scale of the proposals was unacceptable in the context of Backwell's position in the settlement hierarchy and no issue was ever taken with the case studies explained in the Design and Access Statement. Irrespective of their 'lack of provenance' the design criticisms are unfounded in the appellant's view as it is common ground between the appellant and NSC that because this is an outline scheme, details relating to layout, scale and appearance can be considered in subsequent reserved matters applications¹⁰².

187. The second refusal reason expressly refers to Framework para 109, which affords protection to valued landscapes and NSC's witness on landscape matters, Mr Tate, carried out a GLVIA3 Box 5.1 exercise in his evidence¹⁰³. However, the appellant maintains that such a contention is wholly contrary to NSC's Landscape Officer's assessment of the scheme, did not form part of the refusal reasons, nor was it an issue raised in pre-application discussions. To be a valued landscape it must have physical attributes that take it out of the ordinary, beyond mere countryside, as per the Stroud case¹⁰⁴. Mr Cooper, the appellant's landscape witness, explained that the site simply does not meet the Box 5.1 criteria – in particular: the site has no historical or landscape significance, no special physical attributes, and views from the site do not form any part of that assessment process¹⁰⁵. Neither, in the appellant's view, are Farleigh Fields unique in comprising undeveloped farmland with public rights of way surrounded by buildings - the same can equally be said of the land in the 'centre' of Winscombe, which has now been granted planning permission¹⁰⁶.

188. Additionally, the appellant considers that NSC's contention that the site represents a valued landscape, despite the absence of any landscape designation whatsoever or recognition in landscape character guidance, would also be inconsistent with its approach to the proposed Backwell LGS in the eSAP¹⁰⁷.

¹⁰⁰ CD1.19 p.47 Illustrative Masterplan

¹⁰¹ CD15.4 App 1 L6 'noting that J5 is adversely affected by the A370 and this has a *moderate* character (p144 of the Landscape Character SPD) and the strategy is to strengthen the weaker character of the village edges and plant orchards'

¹⁰² SoCG para 7.44 onward

¹⁰³ CD14.5 paras 8.46-8.47

¹⁰⁴ CD8.6

¹⁰⁵ CD14.4 paras 3.18-22

¹⁰⁶ CD18.20

¹⁰⁷ CD5.5

NSC's reason for the northern and southern fields of the site 'exceptionally' warranting LGS designation is the public rights of way and their particular importance in terms of the setting of the Grade 1 listed St Andrew's church. Neither those rights of way nor the impact upon heritage assets are mentioned in the refusal reasons, while none of the other identified criteria were considered to have been met in the appellant's view. The appellant also considers it to be of particular significance that the definition of 'Beauty' as one of the designation criteria expressly includes the contribution of a site to '...the character of the settlement, which would normally be expected to be significant'¹⁰⁸, yet this is not mentioned in the site assessment¹⁰⁹. The appellant says moreover, the eastern and western fields on which the built development is proposed 'do not even figure' and it is proposed to provide the promoted LGS as public open space in any event - a matter that was considered in the delegated report to be a benefit.

189. The Backwell Round footpath would be unaffected by the appeal development in the appellant's view and it considers that the proposal would be seen in the context of the existing development in such limited views of the proposed development that will be available. Mr Cooper's evidence for the appellant is that in these circumstances simply because the houses can be seen is not necessarily harmful; and, apart from Church Town, this part of Backwell is now almost wholly a new settlement and there is nothing significant about the open space, apart from the fact that it has been enclosed. The public open space proposed as an integral component of the scheme will, in the appellant's view, help to address an acknowledged deficit in the settlement, afford greater public access than is presently enjoyed¹¹⁰ and the appeal scheme may present the 'opportunity' to upgrade the existing public rights of way¹¹¹.

190. Insofar as concerns have been raised over views and the road crossing the public rights of way the appellant maintains that:

- Views from upper fields will be retained as indicated in the Design and Access Statement¹¹², houses added on the cross sections shown in the Design and Access Statement represent the heights of buildings shown in the parameters plans, and show that long views of the Moors and the Mendip hills would be retained from the key upper fields of the site; and
- The design of central open space 'was shown by its witness', Mr Cooper, to have the potential to remain open in character with no inappropriately steep gradients, the land being regraded back to the existing slopes, the lane crossing of the open space was compared to well-known example, the Downs in Bristol, a semi-rural landscape crossed without harm by lanes and access roads, with no footpaths on either side, and no lighting.

191. The appellant considers that the evidence of Mr Cooper also demonstrates that this outline scheme can address all the design, landscape, visual and character concerns that have been raised by NSC, BPC and members of the public. Indeed, through its witness, BPC confirmed that it would continue to seek LGS status for the retained open land if planning permission was granted. In the appellant's

¹⁰⁸ NSC appeal document Ref NSC 6

¹⁰⁹ Ref NSC 6 - definition of 'beauty' at p.5; the designation criteria at p.11; and the assessment at p.44.

¹¹⁰ The appellant also says there is no evidence before the Inquiry to support potential Village Green status

¹¹¹ SoCG para 7.50

¹¹² CD1.19 p33

view this indicates that this land would still meet the LGS exceptional criteria relied upon by NSC¹¹³ in those circumstances.

Other Material Considerations and the Planning Balance

192. The appellant maintains that the 220 extra houses in Backwell would have no detrimental effect upon the spatial strategy in the adopted Core Strategy, there is no prematurity objection being run by NSC, and Backwell is the most sustainable of the Service Villages. In the appellant's opinion much was made of the localism agenda during the Inquiry but it considers that it should be borne in mind that much greater proportionate increases have been considered appropriate at some other 'less sustainable' Service Villages¹¹⁴ including 25% at Yatton, 25% at Churchill, 14% at Winscombe and 18% at Sandford. The appellant considers that, on that basis, it cannot be argued that the appeal scheme represents a disproportionate scale of development for the settlement¹¹⁵ or undermine confidence in the plan-led system.
193. Some concerns have been raised by both BPC and interested parties over harm to community cohesion, but in the appellant's view there is simply no basis for what it sees as unsubstantiated assertions and that it would be contrary to the evidence. Backwell represents, in the appellant's opinion, a vibrant and welcoming community with a multitude of facilities and opportunities for community involvement. As expressed in the NP Evidence Base G, it represents an attractive destination that is unaffordable to many who aspire to live there, particularly young people¹¹⁶. The appellant also considers that concerns over infrastructure impacts, including highways and education issues that have been raised by BPC and others, have also been addressed to the satisfaction of the relevant statutory authorities.
194. The planning history of the site figured during the Inquiry including the 'footprints' of the previous schemes that correlate with the planning history as summarised in the SoCG¹¹⁷. While the appellant's planning witness Mr Hutchison acknowledged that the countryside has not changed since a previous scheme was refused in 2000¹¹⁸, nor has it changed much since 1985 in the appellant's view. The appellant adds that it can be seen from the Woodspring Local Plan Inspector's Report¹¹⁹ that three previous Inspectors and the Secretary of State have not considered impact on character to be a pivotal issue. The site has been recommended for approval at appeal and as a Local Plan allocation¹²⁰. The appellant contends that 'suffice it to say' the planning judgments made by Inspectors over the years in terms of impact on the character of the settlement have been varied.
195. While not an issue with NSC, BPC has raised the issue of loss of BMV agricultural land, yet the appellant submits that some 60%, 12.88ha, of the site

¹¹³ NSC's appeal document Ref NSC6

¹¹⁴ Here the appellant refers to its witness Mr Hutchison in Chief, CD5.8 and that Taylor Wimpey is promoting 650 to the west of Backwell and the eJSP has suggested up to 3,600 between Backwell and Nailsea.

¹¹⁵ The appellant says, particularly as Backwell increased by 89 dwellings from the 2001 to the 2011 census (9dpa)

¹¹⁶ CD 5.16 G.21 and G.17 respectively

¹¹⁷ SoCG para 4.1

¹¹⁸ NSC appeal Ref. NSC 15

¹¹⁹ CD18.12 & CD18.13 – the appellant adds that following the recommendation to allocate the site for housing that Council declined because it had a surplus of housing rather than because of impact on the character of the settlement

¹²⁰ The appellant adds that this contrary to the inference made by BPC in its representation to have the appeal recovered for determination by the SoS.

will not be sterilised but remain as open land that, if necessary, could be brought back into agricultural use. The appellant also maintains that the loss of BMV would not be significant in terms of requiring Natural England be notified¹²¹.

196. The appellant commends the overall planning balance exercise that has been conducted by its witness Mr Hutchison along with his conclusions in his proof of evidence at paras 55 to 59. It also asks that it be noted that this exercise was 'essentially unchallenged' by NSC and BPC, save, it says, for the weight to be attached to the proposed public open space, albeit still acknowledged to be a benefit.

197. The appellant also maintains that this is essentially a greenfield freehold site¹²² that could provide the access within a year of grant and delivery of the houses over the ensuing four years; and consequently, its development could make a significant contribution to the 'dire' housing deficit for both market and affordable homes that persists within the district. There would, in the appellant's view, be little identifiable harm as a result of the appeal scheme and significant benefits. In short, it says, the proposal represents an excellent example of sustainable development in the context of Framework para 14.

198. For all of these reasons the appellant respectfully requests that this appeal be allowed.

The Case for Other Parties Who Gave Evidence at the Inquiry¹²³

The Case for Martin Powell

199. He expressed concern that during the short period in which NSC is getting organised to address the housing land supply issue developers are taking advantage and that this developer, having paid agricultural values for land, is being opportunistic. He is also critical of the level of public engagement undertaken by the appellant in contrast to that associated with the NP, for which there was a 96% 'for' vote which included, in his view, no development beyond the settlement boundary and the NP identifies sites for development which is enough, the rest should be protected. He added that Farleigh Fields is the consequence of three hamlets joining over time and allowing the development would undermine that and there would be an overall harm to the character and appearance of the area caused by the development.

200. Mr Powell also stated that the appellant has shown no benefits would result from the development in contrast to a number of problems that would result including the loss of green space and rural character, the formation of a road to link the two development areas and the proposed play area further encroaching on the green space, off-site congestion/traffic, increased flood risk, limited capacity of local services including medical and schools, light noise and air pollution, harm to / loss of wildlife habitat, and that the development would be a disproportionate over development relative to the village.

¹²¹ Mr Hutchinson, the appellant's planning witness, also notes some 10 potential allocations in the Service Villages involve the loss of BMV such that in the appellant's view it is 'clearly necessary' to address the housing requirement.

¹²² The appellant states 'save for elements of the access in respect of which the developer has acquisition rights'

¹²³ CD18.8

The Case for David Andrews

201. He explained that he spoke on behalf of himself and his wife who have lived in Backwell for 20 years, not adjacent to Farleigh Fields, but within a 15 minute walk and set out their involvement in local groups and activities. To them Backwell means a vibrant, caring community supporting local initiatives that improve village life, greenery, open spaces, and the freedom to live life at one's own pace, with room to breathe; and the whole of Farleigh Fields is the "treasure in the heart of the village" - somewhere to walk, relax and drink in the quiet views of the houses, the church and the surrounding trees, somewhere to find a little peace.
202. He added that this sense of peace will be destroyed if any of the fields are developed and instead there would be an impact on Backwell's infrastructure, which he states is that of a village not an urban area. In his view the new road junction and traffic would cause delays to the commuters currently using that road and may also interfere with the effective working of the existing lights and with local traffic attempting to cross the main road; and there would be more people parking on the side roads near the railway station as the car park will be full, and using the already busy Station Road to drive to Nailsea so they can shop there. And with this greater risk to pedestrians including school children, particularly given the narrow carriageways and very narrow pavements, in the village with some roads having a pavement on one side only.
203. He queries with local doctors and dentists as well as schools could cope with around 500-600 extra residents, with no apparent available space around the current surgeries for them to expand, and moving to a new location would be expensive in his view. In conclusion he states that this proposal is allowed to go ahead the people of Backwell would not only lose the "treasure in the heart of the village" but would have to live in a far more congested environment with, in all probability, a detrimental effect on their well-being.

The Case for Rachel Beckingsale

204. She explained that she has lived in Backwell for 11 years and wider local area for more than 30 years, and is able to appreciate Farleigh Fields and its abundant wildlife on a daily basis as her home overlooks the fields. She added that she observes this haven of green space being enjoyed by the many walkers and runners who use the footpath between Church Town and the A370 on a regular basis and the farmer looking after the fertile fields with crops being harvested annually and cattle grazing on the slopes in the distance. In her view these fields are not a 'hole' as described by the developers but a haven of peace giving Backwell its truly individual village character - the developers propose to retain the footpath to the Church and some of the green space around it, however this land would be useless for farming, it would have to be maintained at considerable expense, and the peace and tranquillity of this rural vista would be destroyed.
205. Backwell is a village with a thriving community – as a mother of two young children Ms Beckingsale explained that she appreciates the closeness of community which village life provides, and that the demand for school places

increased to such an extent that the infant school increased its intake in September 2013 from 45 to 60 and immediately filled all the places, a trend she understands has continued over the last 4 years. She also stated that the two local preschools have also been operating at capacity in recent years, and the volunteer run toddler group is currently thriving.

206. She also stated that she understands that more housing is required countrywide and supported the NP which allowed for modest development in the village. With the approval of a planning application to build 65 homes off Moor Lane as well as 8 3 bed homes in the centre of the village and a further 9 new homes likely to be built in West Town, she believes this is as many as Backwell would be able to absorb at this time given the present infrastructure. Even this number of homes could cause a critical shortage of school places and will in her view undoubtedly add vehicles to the already highly congested roads in the village. She does not believe that the building of a further 220 homes on Farleigh Fields is at all in keeping with the size and character of Backwell as a village, and the increase in the number of residents and the traffic they would contribute to the local roads would be unsustainable.

The Case for Peter Hoare

207. He explained that while they do not have a view over Farleigh Fields he and his wife have lived nearby in Church Town since 2001, and that while they have been fortunate enough to live in some attractive places none are as agreeable as Backwell. He added that although not all of the village is pretty it combines a balance of open space with sensible development, an adequate infrastructure and thriving community life which, unlike others we have seen, is welcoming and inclusive; indeed we rapidly became involved in local affairs and he is now Chairman of the local Royal British Legion Branch.
208. He said that he is probably one of the most frequent users of Farleigh Fields as he and his wife walk their dog there almost daily, often on the way to our allotment behind the George Inn, and they take a circular route using both main footpaths. He added that that what they love about Farleigh Fields is the glorious view, the feeling of space and the agricultural setting, with one part used for arable crops and the other for livestock. During school holidays their grandchildren enjoy walking and playing in the fields and they also go blackberrying in the late summer.
209. The proposal would in his view totally change this carefully preserved rural 'oasis' for ever. He said that he appreciates that Charles Church only state the intention to use two of the 4 fields for houses plus roads on the third, but does not believe things would stop there. He also said that any form of development, whether for an access way or for housing, would have a marked impact on the rural sense that you get when walking around this area. The impact that an access way over which cars can and would go being built across one of the fields would in his opinion go against the very purpose of the local green space allocation that has been sought and the views would also be such that the whole feel of the area would change from a rural to urbanised setting.
210. He stated that he thinks the remaining parcel would be too small to farm effectively and BPC would not have the resources to maintain it and that it would become overgrown and eventually be surrendered for housing; consequently, the 'jewel in the crown' of Backwell, the Conservation Area around the Church, would

be lost in a sea of modern housing, just as has happened in nearby Nailsea. He concluded by saying that for decades the people of this village have worked hard to support sensitive proposals but to prevent over-development and he urges the appeal to be rejected and Farleigh Fields be preserved for generations to come.

The Case for Peter Hemmings

211. Mr Hemmings has lived in Backwell for over 20 years and has been Backwell's volunteer Rights of Way Officer for the last 17. He moved to the village on job re-location from London to North Bristol and after looking for places to live all around Bristol, he chose Backwell because of its semi-rural setting and facilities. He added that for the last 17 years he has organized summer walks around the village and helped publish a free "family friendly" walks booklet, which booklet gives details of six easy walks along the most used and scenic paths of the village and highlights interesting points of interest along the routes, and as the ROW Officer, he said that he has surveyed all 62 paths of the Parish and give regular feedback to assist BPC and NSC to keep them accessible throughout the year.
212. He also explained that he liaised with NSC during the creation of the Backwell Round Walks which form part of a series of local walks linking paths in and around villages in North Somerset that can be easily accessed by "Kissing Gates" instead of stiles. He added that Farleigh Fields and St Andrews Church are included in both the Backwell Round paths and the Backwell Walks booklet because these paths have some of the best views across the valley towards Clevedon and Weston-Super-Mare and can be easily accessed by families and older members of the community who are unable to walk the steeper paths behind the church to the top of Backwell Hill.
213. Prior to work starting on the Neighbourhood Plan he attended a presentation given by a government sponsored official. After the meeting he was told by the presenter that, after it was agreed, it would be the definitive document until 2026; many people spent a lot of time overcoming policy changes to get the document formally approved. He closed by saying that the paths and views around Farleigh Fields are valued assets of the village, and that it would be completely spoilt by any development and should be protected for people to appreciate and enjoy in the future.

The Case for Bob Taylor

214. Mr Taylor spoke as a local resident and as Chairman of BPC. He said that he has been a councillor for 22 years and a chairman for 6 years, and that he and his wife have been privileged to live in Backwell for nearly 40 years during which time they ran the village newsagent for over 35 years and got to know many of the residents personally. He heads not just a Council of 15 members but also 'an army of volunteer residents' that believe as he does, that their village needs to grow and prosper in a controlled manner. He added that in order to maintain its attractive character, this is not only for their current residents' future benefit, but also for the next generation of children and their children.
215. To enable this to happen he explained that it became obvious to BPC that they needed to know what residents' thoughts and aspirations were and they therefore commissioned a survey called a Community Plan, which formed the ground work that led them to volunteer to be a 'pilot parish', and to prepare a Neighbourhood Plan.

216. He added that this was far from easy as there was no agenda or guidance to work with, just a general directive from NSC. It involved a steering group of 15 Backwell volunteers headed by Parish Councillor Chris Perry. The plan took 4 years to prepare and was eventually adopted by NSC. It was the first in North Somerset and only the 30th in the country. He added that at the village referendum nearly 1,500 residents turned out to approve the plan by a majority of 96%, and they went on to become a 'N Plan champion' recruited by the DCLG to assist other councils nationally to prepare their own Neighbourhood Plans.
217. He also explained that in the NP one thing that became obvious was that there was demand from older residents for opportunities for them to down-size and starter homes for younger residents, and that they then had to identify and allocate the best area in the village to site them. He added that the site chosen was situated in Moor Lane which has close proximity to schools, buses, the railway station, the garage and associated convenience store, with the main shopping area only 10 minutes' walk away, and at that time the Moor Lane site was designated for industrial use but it had been left dormant so was 'ideal' for this development.
218. He stated that the steering group through the NP quite rightly also tried to identify alternative employment opportunities and sites, specifically the disused and dormant Cole's quarry, and that since the NP was finalized the erection of small industrial units has been agreed for this site. He added that the village is a thriving community, with many successful organizations, plus an active cultural and social life – specifically, Backwell Playing Fields Charity offers its residents both old and young, 4 football pitches, 4 tennis courts, a youth club, scouts and guides organisations, judo plus a play school facility; there are also 20 pieces of play equipment as well as a skate board ramp and a BMX circuit, and a very popular bowls club which also houses 2 Probus clubs. He added that other village assets are the Leisure Centre, the W.I. Hall and the purpose-built Play House Theatre and Film Club, that BPC own and maintain a further 2 play areas plus our allotment site consisting of 80 allotments, and that annual village events are the Donkey Derby, Flower Show, 2 day musical festivals.
219. He said that BPC provides funding annually to many of the 40 organizations that make Backwell what it is, in total to the tune of £40,000, and that this funding ranges from providing their own lolly pop lady, the 'Meeting Point' organisation which gives our senior residents help and advice, to assisting the tennis club and the junior football club update their facilities and promote active mixed sports for boys and girls. BPC are also heavily involved in and help fund the 16-acre Sports Recreation facility the Parish Hall and our Youth Club.
220. He added that BPC have responded to NSC cuts by cutting our own grassed areas and maintained street cleanliness including the voluntary village clean up; that it also helps to retained our village's attractive appearances by maintaining our floral displays and providing a 24 foot Christmas tree on the village green, along with the festive Christmas light display on the main road; and it takes its involvement in the social side of the village very seriously – for instance it will be organizing our Christmas Party for 90 senior residents, Christmas around the Crib for our young families and the Chairman's Christmas drinks, in order to show gratitude for helping make Backwell a close and active community. He added that it was with great pride that they welcomed the Olympic Torch in 2012 when it visited Backwell, held by a youngster from the village and our volunteers

provided breakfast and snacks for over 80 residents.

221. Cllr Taylor went on to say that Backwell provides plenty of community facilities and opportunities for undertaking various leisure activities, however, many residents simply like to enjoy leisurely walks and to relax in the beautiful landscape that makes up parts of the village, in particular Farleigh Fields. These fields make a valuable contribution to the quality of life in the area. It is an area where people can stroll and admire our beautiful countryside where cattle still graze as well as the abundant wildlife. These fields represent a typical English countryside environment of peace, quiet and serenity. He added that the historic Church of St Andrews overlooks these fields adding to their historic appeal and beauty, and from Farleigh Fields there are views across to the Tyntesfield estate and on a good day to South Wales.
222. To Backwell residents Farleigh Fields is, in his view, an important asset just the same as any club or play equipment, and as such it must be protected, and the character and appearance of a development of the size proposed would result in a change from a rural appearance to one of a heavily built up development. He added that above the fields is the oldest part of Backwell which contains the 'well', which gave the village its name, and it also contains the old Manor House, several converted farm buildings, St Andrew's School House, the War Memorial and the Jubilee Stone, erected to celebrate Queen Victoria's Jubilee. In his opinion residents 'mental picture' of the village is synonymous with the Church nestling above Farleigh Fields.
223. He added that from 1984 to 2000 Farleigh Fields was targeted for development by numerous planning applications, all of which were refused at officer level, committee level, government inspector level and finally by the Secretary of State. He also said that at the last appeal in 2000, the government inspector stated "do not bring this application back before us again". Such was, in Cllr Taylor's view, the inappropriateness of the application to build on Farleigh Fields.
224. He went on to say that the A370 and its adjoining infrastructure have remained unaltered for over 50 years and as a result, the capacity of the community to 'accept' new houses is limited. He has concerns about whether the village itself is capable of accepting such a substantial increase in population over a relatively short time period. He added that the village has accepted small pockets of development and has never said no to sensible development; however the 65 homes in Moor Lane proposed in the NP, plus a further 30 in small pockets around the village would provide sustainable development whilst protecting our rural village life which we love so much. He closed by respectfully ask that the appeal be dismissed.

The Case for Jayne Kearney

225. Ms Kearney started by explaining that she has lived in Backwell for 10 years. She added that she walks across Farleigh Fields with her dog most days, and loves the fact that by taking just a few steps off the main road you can find yourself in open countryside, and that the fields provide an incredibly cathartic escape from the constant hustle and bustle of everyday life and she often takes some time to stop and breathe and enjoy the space and the views. For her they are a chance to reconnect with nature - a reminder of the changing seasons - the vivid greens as the hedgerows burst into life in Spring; the warmth of the summer sun making it a pleasure to walk through the long grasses and

wildflowers; the wild field mushrooms that pop up so suddenly in Autumn; and the beauty of a crisp, clear, frosted winter's morning. She added that even when it is pouring with rain and blowing a gale, she would still rather battle her way through the mud than trudge past what she sees as yet more characterless houses.

226. She went on to say that the fields are also a haven for wildlife, and that she has very happy memories of wildlife spotting with her son when he was younger, armed with his I-Spy Nature book they would love to watch the goldfinches flashing amongst the hedgerows, the curious robin hopping ever closer to us along the fence and the crows chasing the buzzards away from their nests. He added that their butterfly identification was always 'a bit ropey' and they were never very good at remembering how many spots were good on a ladybird, but they had lots of fun nonetheless and the dog was very happy to spend the time following scent trails left by the rabbits, badgers and hedgehogs etc. She also said that they spent a memorable afternoon dissecting what they thought were owl pellets collected from around the church - only to discover, after much research and a wealth of learning, that they were probably Buzzard pellets.
227. She concluded by saying that all this would be lost if these fields became a housing development; the wildlife would largely disappear with the destruction of their habitat and a strip of land with a footpath through the middle could never recapture the peace and diversity of the current fields and hedgerows.

The Case for Norma Knight

228. She explained that she has in Church Lane, a short walk from Farleigh Fields since 1984 and has enjoyed the beauty of the fields and their role of the parish, and as a qualified historian with experience in researching local history. She added that she has traced their use in the development of Backwell; first recorded in Domesday Book in 1086, Backwell's prosperity depended on agriculture and this area was prime agricultural land providing pasture for sheep and cattle as well as for crops. She also explained that there was no central settlement, instead there were numerous farms and several small hamlets; the earliest and most important was around the church and manor house and was known as Church Town, and to the east lay Farleigh where inns, a market and a fair became established.
229. She said that until the 18th century the main road through Backwell ran from Farleigh directly to Church Town bounding Farleigh Fields on the south side, which is now Church Lane, and in the 1760s a more direct route between Farleigh and another hamlet at West Town was developed. She added that highway wardens' accounts recorded the use of gunpowder and local labour to level and straighten an existing track and this road, now A370, bounded these Fields on the north side.
230. She explained that Backwell formed part of the Longleat Estate after 1709 and all development was closely controlled by the Marquess of Bath, and that in 1939 the Marquess sold all his land here and this opened the way for new houses and shops. She added that most building was delayed until the end of the Second World War and was concentrated in the middle of the parish where the modern village developed, however even then it was all on a modest scale, with small estates and infill. She added that in her view this continues to be the best way to provide for the future of the parish.

231. She closed by saying that Farleigh Fields lie outside the settlement area and are still good agricultural land, and that they also lie between two conservation areas at Church Town and Farleigh and provide a valuable open space for the health and enjoyment of all parishioners.

The Case for Mark Mallett

232. Mr Mallett said that he has been a Backwell resident on Farleigh Road since 2003, and that his wife and he have taught at the Secondary School and their children attended both the schools in Backwell. He added that he has walked Farleigh Fields on an almost daily basis — exercising his dogs, attending St Andrew's Parish Church or simply in order to gain refreshment and stress-relief from the vicissitudes of life as a Comprehensive School Teacher. He and his family are vehemently opposed to the proposal and outlined three reasons in particular why to allow the Appeal would be to diminish the character of Backwell and the quality of life for its residents.

233. Firstly, in his view Farleigh Fields is an oasis — a green lung — for a village which has become a commuter route between Bristol, Weston-Super-Mare and the M5. The views below St Andrew's are stunning in his opinion. He added that one's direct and peripheral vision is dominated by the landscape of Farleigh Fields in all directions and then the eye is drawn to Backwell Common, Wraxall and Tickenham Woods and the coastline from Clevedon to Weston, and that on a clear day you can see across the channel to Wales. In his view the experience of being in this tranquil haven above the bustle and congestion of the A370 is priceless. He is aware that the revised proposal leaves two fields intact from development, but to allow the appeal would in his opinion represent an amputation and cancel much of the tranquillity described. He considers that the scenic quality of the landscape would be marred by the introduction of a built form of development within the lower fields.

234. Secondly, in his opinion it would inevitably have an impact on wild life. As well as the farm-stock occupying the fields, he said that there are colonies of rabbits and field-mice and that he has regularly seen foxes and red deer. In the skies above, kestrels and buzzards hunt the fields by day and bats are seen and owls heard from dusk until the dawn. This, he feels, illustrates the way in which Farleigh Fields represents a green corridor between Backwell Common and the fields and woodland above St Andrew's on Backwell Hill. Development of some of the fields would in his opinion fatally compromise the habitat there.

235. His final point relates to educational infrastructure – speaking as a parent, teacher in Backwell, and a Headteacher at Chew Valley Secondary School. He said that Backwell School's outstanding reputation has seen it grow markedly over the last twenty years, and that there is a very serious danger of it being required to expand further (because of housing development in the locality) in a way that would significantly detract from the educational experience of local children. He explained that the school is already 1750 strong, and that in his view the impact of being in so large a school is to make a child's experience potentially one of anonymity. Further growth at the Secondary School would, in his view, be educationally deleterious for the young people in its care, and there is also the point that Backwell Junior School is already at capacity on what he sees as being an incredibly cramped site. In his opinion expansion of housing threatens the very high quality of education which these two superb schools currently provide.

The Case for Cyril Routley

236. Mr Routley explained that he and his wife live on 45 Station Road near the station and also lived at 34 Farleigh Road during 1964-71 enjoying this view and appreciating all that it offered. He said that important to them at that time was the visual aspect leading up to the church on the hill, a view they saw every morning from our bedroom window. He added that there was the tranquillity it afforded them of an open space removed from the bustle of modern life; the opportunity to walk along the footpaths. Frequently then it was the custom for groups of walkers to explore the various footpaths in the village on a Friday evening, an activity which continues to this day. He also said that similarly they would appreciate the uninterrupted view from the churchyard down onto the village and he still finds this uplifting even now to stand there and gaze.
237. Farleigh Fields is in his view good quality agricultural land and is used by the farmer for arable and grazing, and is the habitat for much wildlife. All of this would be destroyed forever, he added, if this development were approved. It is specious, in his opinion, to claim that "the houses will not affect the landscape or the character of the village". He stated that adding 220 houses on this site is a gross overestimate of what Backwell can absorb, and coupled with other known smaller planned developments in Backwell, this would add some 300 houses to a village of 1,750. He said that local people care passionately about the character of the village, that Backwell has absorbed small developments successfully in recent decades, and that it would be hard to maintain its character with such a sudden increase.
238. He went on to say that having spent the whole of his working life in education he knows of the reputation of the village schools extremely well, that many people move into the village on this account, and that his next door neighbours are an example and their predecessors, something that is replicated in many of the house sales locally. He added that the comprehensive school is always oversubscribed as are the junior and infant schools. The new housing on Farleigh Fields would in his opinion create an influx of some 400 children and the parents would most definitely be seeking for them to be educated in the village, and this would be impossible without some consideration being given to expansion of education opportunities here. He added that it would be tragic to put the current outstanding schools at danger with this unwelcome development, and that the alternative would be a greater use of the already dangerous and inadequate Station Road, with parents driving their children to Nailsea schools.
239. He also referred to the Backwell Neighbourhood Plan which he said he had perused over the time it has been under consideration, and that from that, it is clearly the belief in the village that the overwhelming majority of villagers are very much opposed to development on this site, being out of character with the greater part of the village. He added that draining the water that flows down the hill is an issue, and that when he lived on Farleigh Road, the field entrance was just one house away from his and that this was the focal point of much water pouring off the hill from exactly where the westerly part of the development will take place. This, he said, created regular flooding on to the A370 during periods of heavy rain, and covering the grassland with ever more concrete and tarmac would exacerbate this danger.
240. He closed by explaining that although he and his wife moved away from Farleigh Road in 1971 they still regard Farleigh Fields as a crucial part of village

life, and value it no less since they moved. He added that his wife was born in Backwell, and is an organist at St Andrew's church, and that she has taught music to countless Backwell boys and girls over the years - often to a couple of generations. He said that Backwell is a stable place, with a fantastic, caring community and asked that this is not endangered with such an unwelcome development on such well-loved fields.

The Case for Colette Howard

241. She explained that she has lived in Backwell since 2002 and wished to express her strong feelings regarding the heavy traffic and bad parking experienced in Backwell on a daily basis, especially close to the railway station. She added that she believes that the proposal would significantly add to congestion in and around Backwell and would add even more chaos and hazards to our roads for pedestrians and motorists alike, and that while she had voiced my concerns many times to NSC and BPC, some suggestions on how to improve the situation have been discussed such as parking permits very little has ever changed for the better.
242. She said that she had been a commuter using Nailsea & Backwell Railway Station since 2002, travelling to Bristol and more recently to Bath on a daily basis, and that she had witnessed significant growth in the levels of traffic using the main roads and side roads during that period, and it has been extremely noticeable how many more people are now using Nailsea & Backwell Railway Station, which has impacted on the volume of traffic too. It is quite noticeable in her view how busy the station now is, not only by how little platform space there is available to stand on when waiting for the train, but also the lengthy queues to buy rail tickets, the large volume of cars parking down side streets etc; and she added that she felt that a large proportion of these rail users are not locals, and are driving to Backwell from other villages to commute to Bristol and beyond.
243. She gave an example of commuter numbers by saying that when her regular train arrives in Backwell at 5.30 each evening, at least 2 out of the 8 carriages disembark, and those people then spread themselves amongst the local side streets and to the station car park to collect their cars and head off out of Backwell to wherever they live, which causes chaos along these narrow residential roads and Station Road especially; and this relates to only one train. She added that she has witnessed people leaving this train to collect their cars, doing 3 point turns and blocking off roads; parking on double yellow lines all day down our narrow residential streets, as they rush to catch the morning train and just cannot be bothered to use the station car park, even though there are still spaces available; and they generally cause a nuisance of themselves to local residents by their inconsiderate parking right outside their houses and their quite often arrogant and rude behaviour whilst doing so.
244. She explained that she believes that another housing development would produce even more traffic on our streets, with more people potentially using the railway system, and parking on our streets, a situation that is already creaking at the seams; and although you may think residents of this new development could easily walk to the railway station from the Farleigh Fields development, she would put money on it that a lot of them would not. She added that in any event more traffic would then be added to the mix along Station Road and the residential side roads, which are already congested to an unacceptable level for those who already living there, let alone adding more traffic to the situation.

245. She believes a new development like this would bring a significant level of extra traffic to the area, it would cause severe congestion to the village especially at busy periods, on a scale that you would expect from a town not a village, and it would become a bottleneck for motorists, locals and business people alike, trying to go about their daily business in the area in a safe way. In her view some common sense is needed here and she suggests that Backwell already struggles from a traffic perspective, and if a comprehensive study were carried out, it would quickly become clear that our roads cannot cope now with what is being asked of them, let alone coping with higher volumes of traffic created by such a development. She added that no new residential roads being proposed by the developers would remove the congestion that would still hit the A370 and Station Road at some point.
246. She explained that she had thought the investment that locals had already committed to producing the NP would show evidence of residents' willing to compromise and plan for growth in the village, as they realise they cannot stand still, and it is a document produced by intelligent people who know change must come and have worked hard to put forward sensible and manageable suggestions to handle future growth of the village over the next few years with input from villagers. On that basis she asks why is this being ignored, is the message we should take from this inquiry an indication that if a developer fancies a piece of land, such arrangements already in place should be ignored - not a good message to be sending out in her view, nor does it inspire people in the future to work on producing such a document? She closed by saying that she is against the proposals.

The Case for Alistair Ireland

247. He explained that he has lived in Backwell for 10 years, some 15 minutes' walk from Farleigh Fields, and that he has always been an active person, from a young age involved in competitive sport as well as being a keen walker. He explained that following an injury five years ago he has used Farleigh Fields more and found it a helpful and enjoyable environment that aided his recovery.
248. Whilst walking in Farleigh Fields, he said that he meet other regular walkers also enjoying the very special ambiance and the wonderful views, and that he is able to slow down and unwind, finding a calmness and serenity that is not possible to achieve if you are having to dodge traffic as you do on other walks in the village. He added that he feels that Farleigh Fields are a very special place; the lower part provides a pleasing visual break that is experienced quite swiftly upon entering from the road, as you walk up the hill, the views from the footpath as you look both right and left are extensive and provide a sense of being in the countryside. He added that that if any part of the fields were built upon this sense of being in the countryside would be eroded and destroyed, and that no amount of planting or landscaping would reduce this very permanent and damaging impact.
249. The fields have in his view many interesting variations in the plants, and he said that that he has found special parts of the fields that have an abundance of bees and pollinating insects feeding on the clover at certain times of the year, and incidentally has found more four leaved clover there than anywhere else. He added that that he purchases local honey, made from hives kept just above Farleigh Fields and must say the honey is the best he has tasted and prevented the occasional bouts of hay fever. He expressed concern regarding potential

flooding associated with the development and closed by saying that losing this beautiful space would be a tremendous blow to himself and to those who already enjoy walking in what we regard as our "Village Green" and would remove forever an oasis of calm from an increasingly "busy" world.

The Case for James Harwood

250. Mr Harwood explained that he has lived in what he considers to be the amazing, unique village of Backwell for nearly five years with this wife and three children. He is originally from Yorkshire and feels that he has found a true home from home. Having children was his driving force to get out of a big city environment and Backwell has in his view definitely been that as it has a true village feel and is a perfect size to allow for an amazing community spirit. He added that that when they first discovered Backwell they were drawn by the lovely open spaces surrounding the village and the fantastic country environment that surrounds and is integral to this amazing village.
251. Farleigh Fields, in his view, forms a significant portion of that feel and without it he does not feel that Backwell will ever be the same again, as it would lose its village feel. He explained that as a family they love walking across the fields and my children often remark on how lucky we are to have such a fantastic environment on their doorstep, and that they often walk across the fields appreciating the wildlife and wild flowers that are in abundance. In his opinion it is a truly educational experience for his children and they see different things every time they walk across them; whether it is up to the church or to continue walking up to the woods above Backwell. Building on any of the fields will in his view result in the loss of the very pleasing, open and agricultural attributes of the area. The character and appearance of the entire area would, he feels, be adversely affected and changed forever through the construction of the buildings, roads and hard surfaced areas. He added that there is likely to be some street lighting as well which will create an unwelcome intrusion in an otherwise rural setting.
252. He explained that he feels that building on this integral part of Backwell would be so detrimental on so many levels, and that it would change the whole aspect of the village feel and would restrict my children's appreciation of the natural surrounding environment. He added that his children absolutely adore the open spaces of Farleigh Fields and often will ask to put on their wellies and venture across the fields. They are also at the local schools and it is in his view a very privileged option to walk them to school. As it stands, he said, there is significant traffic already along the busy A370 and traffic is a major concern to most parents, and at school times it is always essential to watch our children closely as cars and lorries seem to be an endless cause of danger along the busy remain road into Bristol. Building a further 220 house on the fields would in his opinion be ridiculous; the congestion and danger would be so much worse. He also said that Backwell struggles with the traffic it already has, and that with an extra 220 homes he would expect at least an extra 1.5 cars per household, so an extra 330 cars at a conservative estimate - Backwell would not cope in his view. He added that the danger to his children would be increased, the congestion would be increased, the pollution would be increased and Backwell would become a worse place to live.
253. With the extra 220 homes school places would in his opinion be a problem, while doctors' appointments would become impossible - they are often hard to

get already, he added. With the extra suggested development and Backwell being a draw to families he estimated a potential of 400 extra children to the Backwell population. He explained that he feels that the village is already at breaking point for school places and doctors' appointments and that the extra development is definitely not in the best interest of the village and totally against the NP, which was supported by many residents.

254. He said that there are already close to 80 new homes passed to be built in the area, which is sustainable, but that 220 extra homes is definitely not. He added that the area close to the new ring road closer to Bristol centre would be more sustainable with better travel links and better links to employment. Backwell is in his opinion a predominantly a family village with very limited employment options, such that any new development would see its inhabitants having to travel out of Backwell to jobs outside the area, thus adding to the already dangerous traffic conditions on the Backwell roads.

255. He concluded by saying that the development of the land be rejected again and never be allowed to be reconsidered, and that it is not right for the village, not sustainable and would inevitably make Backwell a poorer place to live; be that for the children and the adults of the village.

The Case for Richard MacLeavy

256. Mr MacLeavy explained that he spoke in opposition to the scheme in a personal capacity, as a life-long resident of Backwell, and as a Parish Councillor - a member of BPC. His objection is on the grounds that the application is, in his view, made in direct contravention of the policies outlined in the NP, and the planning policies adopted by NSC. He said that quite simply, the development proposals do not conform to the NP and that the appeal directly opposes, and is contrary to, the government's Localism Acts.

257. Regarding the NP, he explained that he fully supports the policies proposed and adopted therein because they were developed through thorough research, analysis, planning and consultations with local residents and businesses, and it was then ratified by a referendum which indicated overwhelming support in the village. However, the appellant, in his opinion, seeks to ignore the NP. He added that while he had no direct role in the preparation of the Plan he is deeply committed to it and an enthusiast for localism as he said that he has witnessed at first hand the real and positive results of local democracy as a local councillor. He also said that any approval to the application development would constitute a blatant defiance of the NP, and portray serious disrespect for the wishes of the locality and NSC as local planning authority.

258. Regarding what he described as the impact on the village identity, Mr MacLeavy said that there is no doubt that such a development would have a serious detrimental impact on the character of the village, and place an intolerable burden on the village's facilities. He added that NP allows for moderate, sustainable growth, but a development of this size, and in this location, would place extreme demands and an unacceptable strain on the village's resources. He also said that the prime agricultural land is a feature of the community and confirms its position as an attractive and desirable village within North Somerset. In his view the non-affordable housing proposed are likely to be priced towards the higher end of the market, such that the development will not provide for young people growing up in the community who

- may wish to purchase a home and remain within the village.
259. Regarding localism, he said that it was Greg Clark MP who introduced the original legislation and who in September 2011, announced:
- ˘ Neighbourhood planning will hand power back to communities to decide the vision for their area as they see fit, encouraging people to plan positively for their future.
 - ˘ This is localism in action and the enthusiasm across the country for neighbourhood planning shows how keen communities are to get involved. '
260. Clearly, in Mr MacLeavy's view, government statements have encouraged belief in the status of neighbourhood plans and galvanised communities across the country to prepare them and to adhere to them, and to allow this development would fly in the face of the NP resulting in erosion in public confidence in the planning system.
261. In conclusion he said that the proposals blatantly contravene the NP by proposing to build on land that falls outside the village settlement boundary and potentially placing an intolerable burden on the village's resources. Most importantly, he added, approving the proposals will strip Backwell of a popular, well-made development plan; alarm communities involved in neighbourhood planning throughout the country; and expose the government's localism policies as a charade and a failure of democracy.

The Case for Geoff Wells

262. Mr Wells said that he was speaking on behalf of himself and his wife and also for Backwell Residents Association (BRA), which he said was formed in the early 1980's to maintain the village as a vibrant and caring community. He added that on planning matters they have always opposed housing on Farleigh Fields but that they do support projects for some 80 dwellings, as identified in NP; adding that the BRA has almost 350 household members, each paying £10 annual subscription.
263. He explained that he was born in the Midlands into a family working in agriculture, although his working life in Bristol has been office based, and that Backwell still has lots of agriculture around it which he greatly values. He explained that he lives in the village centre, close to the Playing Fields, so in no way are we adjacent to Farleigh Fields, where he often walks. He said that he takes great pleasure from seeing Farleigh Fields being worked as farming land - sometimes arable, other times grazing for sheep or beef cattle. He added that there are often buzzards overhead, and a few years ago, a ploughing match was held there, with the field full of vintage tractors.
264. He explained that he took over an allotment, when they were created in 1977, and chairs the allotments committee, and that Backwell allotments field is well kept and popular with over 80 families who work them, and many walkers who use the popular footpaths through the field. He also said that he has always played tennis on the excellent courts in Backwell Playing Fields, and still enjoys it, and that every week, hundreds of people, young and old, enjoy the varied facilities offered at the Playing Fields. He added that there are 3 great open spaces in Backwell; the allotment field, the Playing Fields and Farleigh Fields - each has its merits, with Farleigh Fields being the only one that is farmed, and is

still perfectly tranquil.

265. He went on to say that Farleigh Fields is a small acreage to be farmed, and that, should any building take place on the fields, it would certainly make farming unviable on any remaining and the link to agriculture would be lost. He added that donating some of the land to the village as a so called amenity would be of no value whatsoever – there would be a cost to maintain it, and it would quickly deteriorate.
266. He also said that prior to the inquiry, he and his wife examined the latest comments on the proposal in detail and of the 353 comments only 3 were in favour. He also said that he created a geographical map of objectors and found that a quarter live adjacent to Farleigh Fields, while a quarter live in 3 areas remote from the centre - near the station, and at the Weston and Bristol ends of the village. The remaining half were, he said, in the central area of the village near the shops, neither close nor far from Farleigh Fields, which in his view shows that they are appreciated by the whole village, and not just by those who live on their borders.
267. In summary, he said that Farleigh Fields are outside the settlement boundary, and should be protected as an agricultural asset; they are easily accessible to most houses in the village, which make Backwell very different from a suburb of Bristol. He closed by saying that he hopes the Inquiry will judge, as others have in the past and that Farleigh Fields should be retained to the benefit of the whole community, as a unique piece of farming land in the heart of our village.

The Case for Mike Phillis

268. He explained that he and his wife have lived in the village since 1978 as Backwell appeared to offer a great deal as a place to raise a family, and that over the years their decision has proved to be a winner in every sense. He added that Backwell has every facility to provide a full healthy lifestyle that good Town Planning seeks to achieve as an objective; as developed to date the village thrives as a success story. He went on to say that as a village caring community they have spent much time and effort in examining where might further development take place which could complement the existing without prejudicing the vibrancy and balance, and that this has been incorporated in the NP, which was formally approved and adopted in 2015.
269. The appeal proposal, in his view, amounts to a carbuncle in the very heart of this village and if allowed would destroy the community as exists today. He added that it seeks to increase the number of houses within the village significantly and in doing so is taking out of use almost 8 hectares of grade 2 agriculture land against national policy in an area that contributes so much to the beauty and tranquillity of the open views up to the Church and down across the valley to the Wraxall hills. He also stated that there is no doubt that the proposal would damage the concept of Local Green Space and would take away much loved open space and fresh air from close to the village centre in direct conflict with accepted good practice, and that it would negate all of the good planning objectives achieved to date to meet the standards of sustainability and would fly directly in the face of National Planning Policies. The addition of 220 units would, in his opinion, bring significant and possibly saturation levels of extra traffic movements to the A370, Dark Lane, Church Lane and Station Road increasing serious safety issues particularly at peak times especially as all are

school routes.

270. In conclusion he stated that he feels that there is absolutely no merit in any direction that can possibly support this appeal but so much can be saved by dismissing it, and that the proposal directly challenges the formally approved planning policies and objectives and any allowance of the appeal would make a total mockery of all the sophisticated planning framework developed over the many years.

The Case for Chris Miles

271. He explained that he has lived in the village since 2014 with his wife and two young children, some 10 minutes' walk from Farleigh Fields, which would be will be detrimentally changed forever should the proposal go ahead. He stated that he has numerous reasons to oppose it but would focus on two key issues that he feels most passionately about - the strain on the local schools and the destruction of local green space.

272. Regarding local schools he said that his family has first-hand experience of the existing strain already placed on both Backwell primary schools - West Leigh Infants and Backwell Junior School, and that when they first moved to the village their daughter was unable to secure a place at West Leigh as it was already heavily oversubscribed. He went on to say that eventually they secured a place in Nailsea, so instead of walking to the local school they drove, and soon found this was a common problem. He added that he shudders to think how many extra cars are on our local roads at peak times because of this. After a year, his daughter got a place at West Leigh and his son was accepted this academic year as a sibling. He explained that they are both active parents involved in the school drop off and collection at the infant and junior schools, and that they can see these schools are already at capacity and there are more siblings coming through.

273. He also stated that if the application were approved, it would not be a case of a few extra children but about 100 to 200. He asked where on earth do these new extra children go to school - squeeze them in at Backwell, or Nailsea, Long Ashton and so on? In his view to have more cars and traffic is not right or healthy, and ultimately the schools will become overcrowded and the children's education will suffer.

274. Regarding local green space he said that they are lucky to have their niece and nephew at Fairfield School who they collect on a regular weekly basis. The trip from the junior school, after picking up their daughter across, across Farleigh Fields is taken as often as possible. He said that their children, like so many in the village, enjoy the opportunity to see the cattle and wildlife up close, and only recently they saw and heard their first owl in the trees at the back of the school. This local green space provides a haven for wildlife in his opinion and provides a safe open environment for children to walk and play without fear of vehicles.

275. He added that he was lucky enough to grow up in the Cotswolds so can appreciate a good view, but said that there are two views he finds the most magical all year round. He stated that as a keen cyclist, he regularly cycles down Wraxall Hill to the junction of Bristol Road and the view looking back towards my home, and village across the valley with St Andrews Church and Farleigh Fields at the centre is the most glorious around. But the most important view, in his

opinion is from our village looking back toward Wraxall from the Conservation Area at the top of Farleigh Fields by the church. He added that the full panoramic scene makes him realise how lucky they are to live in the village. He closed by saying that if this application were granted it would be a travesty and to emphasis this point he asked that reference is made to a photograph that he has supplied¹²⁴.

The Case for Sarah Rees¹²⁵

276. Ms Rees explained that she has lived in Backwell for 26 years and works as a Therapeutic Counsellor with many North Somerset people who are struggling with a variety of Mental Health concerns. She added that her interest in keeping Farleigh Fields as what she describes as an oasis of unspoiled green, focusses on the benefits to health and wellbeing of this area of natural beauty and tranquillity. She said that this compact yet natural and open green space offers a haven for nature lovers, ramblers and dog walkers, and that it is a safe route from the Church Town area to the village through unspoiled countryside for people of all ages, but especially for students at the 3 schools in Backwell.

277. She referred to what she described as considerable evidence to support the need for green open spaces to support people of all ages with improving and maintaining their wellbeing and said that:

1. A recent study by Dr Ian Alcock et al at the University of Exeter Medical School, evidenced that 'green spaces deliver lasting mental health benefits'. In a five year study, using data from over 1,000 participants, he showed that green space in towns and cities can lead to significant and sustained improvements in mental health. They found that, on average, movers to greener areas experienced an immediate improvement in mental health that was sustained for at least 3 years after they moved. The study also showed that people relocating to a more built up area suffered a drop in mental health. In 2012 the World Health Organisation cited depression as the leading cause of disability worldwide, and this study builds on research that has found natural environments could act as vital resources to improve health and wellbeing.
2. The Groundwork 'Green Space report' in 2012 also summarized the health benefits of green spaces stating that:
 - The more time people spend outdoors the less stressed they feel — an important consideration given the cost to the UK economy of depression and mental illness, which has been calculated at £26.1bn pa.
 - A study of GP records in the Netherlands indicated that the annual prevalence rates for 15 of 24 chosen disease clusters was lower where there was more green space within 1km. This correlation was strongest for anxiety and depression, and among children.
3. The National Institute for Health and Care Excellence has also published

¹²⁴ Mr Miles supplied a photograph which is attached to his statement at CD 18.8

¹²⁵ Ms Rees provided the following References to support her statement: 1. Longitudinal Effects on Mental Health of Moving to Greener and Less Green Urban Areas - Ian Alcock Mathew P. White Benedict W. Wheeler Lora E. Fleming and Michael H. Depledge - Environ. Sci. Technol., 2014, 48 (2), pp 1247-1255 Publication Date (Web): December 9, 2013 (Article); 2. Grey Places Need Green Spaces. The case for investing in our nation's natural assets - Julian Dobson 2012; and 3. NICE <https://www.nice.org.uk/Guidance/PF18> Physical activity and the environment. Public Health guideline 8 (PH8) 2008

guidelines on the importance of public open spaces for health and wellbeing. The Public Health guideline 8 (PH8) published in January 2008 on Physical activity and the environment says in Recommendation 4 that designers and managers of public open spaces, paths and rights of way, as well as local authorities should, amongst other things ensure public open spaces and public paths ... are safe, attractive and welcoming to everyone.

278. She closed by saying that these three all evidence the importance of keeping this area of natural and unspoiled green in Backwell, to maintain and improve the mental health and wellbeing of residents.

The Case for Lorraine Hopkinson

279. She explained that she is a mother of two 2 boys and with her husband and dogs they have enjoyed living in Backwell Village for around 12 years, and they moved to the village because they wanted to bring up their children in a healthy and safe village environment and enjoy all that goes with that. Their boys have attended the local schools and currently the 12 year old walks to Secondary School on his own each day. She and her 7 year old either scoot or cycle to the Junior School each day. She added that the benefits of children walking or cycling to school each day are well documented and encouraged by all Government agencies, and as well as all of the health benefits for the children, (and the grownups!), there are of course the environmental benefits too, things that are very important to them as parents.

280. She went on to say that their journey to school is not without its issues, however, as traffic travelling through the village on Farleigh Road to Bristol is very heavy, similarly traffic travelling to and from Nailsea on the narrow Station Road, where buses have to mount the pavement in places to pass, is very congested, particularly as the entrance to the Secondary School sits on Station Road. She added that children already frequently spill on to Station Road as the pavements are narrow and overcrowded, and that there have sadly been two incidents recently with pedestrians (one a school child) being hit by cars on Station Road. She also said that the Junior School sits at the top of Dark Lane, next to the recycling centre and the proposed new business park, again these are very busy roads indeed.

281. She then asked 'how on earth could Backwell Village cope with an additional 220 houses?', and added that extra cars on the already congested roads, extra children trying to find a place at the small Infant and Junior Schools, which she said are already full, extra patients at the Doctors Surgery and so on. She added that 220 houses bring people, children and cars who all need to be supported by an infrastructure, Backwell is a Village, it is not equipped to support this significant increase in the number of houses being built over what she imagines would be a relatively short period of time. Its roads are in her view narrow village roads and its pavements are narrow village pavements, while the Schools are small village schools.

282. She feels that the impact of 220 houses would be to the detriment of everyone, with gridlock on the roads, an increase in pollution, safety issues with cars and pedestrians alike, resentment amongst the community as parents compete to get their children in to the local school, more parents driving as they cannot get their children in to the local village school. And ultimately, she said, the enjoyment and quality of life from living in a village is gone, because all of

the things that make it a village, like walking and cycling to your local school have gone.

283. Finally, she said that she would like to add that people in Backwell are not NIMBYs, or adverse to any type of change; people moving to the village are always welcomed but that a rapid influx of new people will, she feels, be difficult for a village of this size to absorb over a short period of time and will cause social tension and disrupt the social cohesiveness of our tightknit community. She added that it would impose a strain on the local roads and local facilities and stated that over 80 new houses have already been allowed and are allocated within three locations in the village. She closed by saying that Backwell is the community's village and as a community they have a duty of care to everyone both old and new, to ensure that it remains a village, with all that entails and something they protect for future generations - because once it is gone, it is gone forever.

The Case for Bill Charnock

284. Mr Charnock explained that he lives 10 minutes from Farleigh Fields and arrived here for a number of reasons which he outlined. He was attracted by open spaces close to place of work and the huge local interest in natural History embodied in North Somerset Wildlife wardens. He explained the work that had been done to undertake a comprehensive wildlife survey of parish involving those wardens and local residents creating the Backwell Environment Trust (BET), of which he was the founder Chairman from 2004 to 2012. He added that the BET canvassed every house in Backwell and following numerous small donations plus a grant from NSC it has bought 22 acres of nature reserves, for which there is a huge weekly volunteer input to managing them. This work has led to him being awarded the Queen's award for volunteering.

285. He said that the NP involved the comprehensive collection of all available information on Backwell biodiversity with input from a range of groups and organisations. He added that his main point is that for agricultural land Farleigh Fields are particularly bio-diverse, and that this is due to their connectivity to moorland to west, open country to east, Oldfield Down to south and Backwell Lake to Tickenham Ridge to the north. He added that the work associated with the NP and the areas special characteristic led to the recommendation that Farleigh Fields at large be designation as LGS which has the overwhelming support from villagers. He closed by saying that losing Farleigh Fields would be a significant loss of connectivity and one could forget about the continued presence of peregrines on the Church Tower.

The Case for Keith Riches

286. Mr Riches said that he and his wife have lived in Backwell since 1973, in four different parts of the village, since 1984 in Farleigh Road, and that during the first 24 years he was away much of the time in the Royal Navy and it was always a source of comfort to him that his family were settled in a safe, pleasant community. He added that they have always tried to take advantage of, and contribute to, the life of the village, and their sons attended the three village schools.

287. His first point was to endorse all that has been said about Backwell by the council representatives and other residents. In his view Backwell is not a picture

postcard village and it is blighted by very busy roads; nevertheless it is a vibrant community and a very special place to live, and as regular walkers they have always enjoyed the open and accessible nature of Farleigh Fields as an integral part of the village's character. He added that the two footpaths reflect the agricultural use of the fields - they are wet and muddy for much of the year, and one is steep in places - but they are ancient rights of way, and are shown on the OS maps; and they are part of a complex network of such paths in working fields, none of which have, or need hard surfaces. He said that he had heard it said that Backwell has a deficit of hard surface, flat, accessible paths, but he does not agree and referred to the playing fields, the open space behind Backwell Vale, Backwell Lake and Rockwell Environment Trust Nature Reserve all having appropriate hard surface paths in his view.

288. As part of this development it has been proposed that ten or twelve hectares would remain as some sort of open space, with various hints that it could still be used for agriculture, however he does not consider this would be viable and predict that any development would result in all of this best and most versatile land being taken out of agricultural use.
289. The access onto Farleigh Road is narrow and seems to be reliant on unsightly retaining walls in his opinion, and the road connecting the two halves of the proposed development, now called a lane, crosses the steep middle field. This lane, he said, would require significant landscaping and crossing points, and would be the route for service and residents' vehicles for approximately 100 houses. He added that presumably there would have to be street lighting throughout the site, resulting in this development being a beacon of unwanted illumination instead of the current dark space. He also said that at the moment, much of Backwell does not have street lighting and that is how most residents prefer it - in short, this lovely rural setting would be lost in his view.
290. He said that at present, Farleigh Fields are a satisfactory 'Rural Drainage System' most of the time, soaking up rain as it falls, but that this 'system' can be overcome by heavy rain, causing a mini flash flood and ponding on Farleigh Road bad enough to disrupt traffic. He added that on several occasions during recent years, prolonged heavy rain has resulted in the south side gardens becoming water-logged, with more serious flooding on the road, and consequential overflow into gardens and buildings on the north side, and on a couple of recent occasions this has been bad enough to cause costly damage in the school buildings. He went on to say that against this background of very real concerns he notes that in the 2000 application a 'village pond' was proposed at the bottom of the middle field, and in the 2015 application 'attenuation ponds' were proposed, and these are now called 'SuDS'. He stated that he is not convinced that these proposed drainage areas would be big enough to safeguard all the properties mentioned, and that he is also certain that most of the time these areas will not be bone dry or nice full ponds, but a muddy wet mess.
291. He said, to summarise, some features of the development proposal are as flawed as previous applications and demonstrate a serious and continuing lack of sensitivity for the site and its environs.
292. He then turned to what he described as wider village issues and said that unfortunately, there is far too much reliance on cars for work and trips to the schools and shops. One end of this proposed development he feels is not far from the village centre but the other end is quite some distance further. He

added that villagers are lucky to have a reasonable bus service along the A370, a less frequent bus service to Nailsea, and a train station - on the face of it a sustainable location; but this ignores the local and regional details. He also said that not many employment centres are directly accessible from these bus and train routes, so most people use a car, and while the village does have a small supermarket and other useful shops, a great deal of shopping is done in the bigger retail facilities in Nailsea, by car. He also said that although three local schools are close by, the Infants school is some 1.5km to the northwest. If normal patterns prevail, it is in his opinion likely that younger pupils would be taken by car, perhaps en route to work.

293. He went on to say that he has read and heard what the appellant's consultant has to say about traffic predictions, apparently based on what he described as a brief, localised survey and some fancy modelling. In his view something does not stack up; and he said that there is a continuing, remorseless increase in traffic along the main road, bark Lane and especially Station Road, and villagers have to contend with the cumulative effect of other developments which feed increasing amounts of traffic through Backwell. He added that there have been numerous accidents over the last couple of years, local and commuting journeys by the new residents in these 220 houses would exacerbate all these issues. He said that he acknowledges that some people will walk to the shops, the bus stop or the train station, but that Station Road in particular is already too busy to be pleasant to walk along and cycling is hazardous. He added that the proposed development is not as sustainable as it is claimed to be.

294. He closed by asking that the NP and the wishes of Backwell residents are supported, and invited the Secretary of State to reject this appeal in line with past decision making.

The Case for Jayne Kirkbride

295. She explained that she has lived in Farleigh Road for 16 years and that there are many reasons why she believes that the proposal should not proceed, but concentrated on what she described as her real concerns with the proposed access sites and related traffic issues. She said that the proposed vehicular and pedestrian access points are situated between the entrances for two schools, and added that during the last 16 years, she has been a full time housewife, walking both of her sons to the local schools, walking her dog, walking to local amenities and driving her car through the village, on a daily basis. As such she says that she sees the traffic at all times of the day, every day, from the perspective of both a driver and a pedestrian.

296. Farleigh Road is, in her view, a busy and fast road with deceptively dangerous bends, and that during the daily rush hour, at bank holidays, on the first day of school holidays and when there are accidents or delays on the local M5, stationary or very slow moving traffic tails past the entrance to Church Lane, and often up to the George Inn. She and her neighbours along both sides of Farleigh Road currently experience difficulties in joining the traffic in both directions.

297. The proposed 'huge' increase in traffic entering Farleigh Road at this dangerous point in the road would in her opinion lead to immense problems, not just to the residents, but all other road users and pedestrians, including drivers attempting to join the A370 from the development. Motorists would, she feels, find the time taken to get through the crossroad traffic lights, greatly increased.

She added that this currently results in motorists taking risks, regularly driving on the pavement, to undertake traffic turning right, either to homes, the leisure centre or making a right turn into Station Road, regardless of pedestrians particularly children being on the pavement. She went on to say that an impatient tanker driver carrying aviation fuel tried to undertake traffic turning right just past the pedestrian access point, that she and four children were walking home from school on this bit of pavement, and that the police were involved.

298. She also said that there have been numerous accidents along this stretch of the road, since she has lived here and that this includes the traffic island outside her house being destroyed 5 times, the lamp post outside no. 48 being knocked over and replaced twice. She added that in October 2015, the whole road including pavements were closed for 6 hours outside her house and no. 52, when a refuse lorry lost control driving past no. 56 towards Weston on a dry sunny afternoon at school going home time, swung across the road, hit a van and landed on its side in the middle of the road. In the autumn, her 16 year old, son was knocked off his bike and thrown onto a car, whilst doing a right hand turn, although he was wearing a fluorescent jacket and it was a bright sunny day.
299. She concluded by saying that recently, a car travelling towards Bristol careered across the road and demolished the metal fence at no. 38, and that the most recent accident (Sunday 26th February 2017) was a car travelling to Bristol, which lost control opposite the pedestrian access, mounted the pavement and destroyed the traffic island, outside no. 34.

The Case for Lisa Bates

300. Mrs Bates read a letter prepared on her and her husband's behalf concerning their property 58 Farleigh Road, which forms part of the site and specifically part of the proposed vehicular access to Farleigh Road. In summary, the letter explains that in order to construct the highways works and dedicate the access land as highway the appellant would need to reach an agreement with Mr and Mrs Bates, and that while they are in negotiation, at this stage it remains unclear whether agreement will be reached. The letter concludes that as things stand the appellant would not be able to satisfy the suggested Grampian condition regarding access provision and adds that if the position changes after the close of the Inquiry an update would be provided.

Written Representations

Representations Made at Appeal Stage¹²⁶

301. There are some 334 further individual written representations on the appeal from some 282 different sources/addresses, including from local residents, the Federation of West Leigh Infants School and Backwell C of E Junior School, and the Backwell Residents' Association. These largely raise objections to the proposal on grounds similar to those made at the Inquiry by NSC, BPC and the other interested parties who gave evidence.
302. There are also two written representations from residents of Backwell who support the appeal development on the basis that it would deliver additional

¹²⁶ INSP.1

housing in the village and assist affordability in the area, the site is better suited to housing than other proposed sites and is not very good agricultural land, and the scheme is sympathetic to the environment.

Representations Made at Application Stage

303. The representations made in respect to the planning application were attached to the appeal questionnaire and summarised in NSC officer's report on the appeal development¹²⁷. The report records that approximately **929 letters of representation were received** from interested parties, predominantly local residents **923 objecting** and **6 supporting** the proposal. It provides an analysis of the matters raised in the objections, which are generally on grounds repeated by interested parties at the appeal stage. The officer's report also sets out the majority of the responses from **consultative bodies** to the application¹²⁸.

Conditions

304. During the course of the Inquiry NSC and the appellant jointly submitted a schedule of conditions. At the Inquiry session on conditions there was also further discussion and broad agreement between the main parties regarding some of the detail of the suggested conditions, which led to a final schedule of 32 suggested conditions¹²⁹.

Obligations¹³⁰

305. In summary, the S106 Agreement contains planning obligations in respect to:

- The provision of on-site affordable housing at a rate of not less than 30% of the total number of dwellings developed;
- The provision, use and management of on-site informal public open space, attenuation areas/SuDS, landscaping buffers and play area;
- The provision of highways works including a priority junction with a ghost island and right turn lane, a pedestrian and toucan crossing, four pedestrian islands, and signing and lining works to support the proposed 30mph speed limit in Farleigh Road, along with financial contributions and bonds to support their delivery; and
- Financial contributions, which would be index linked, to provide:
 - Improvements to two bus stops between the proposed site access points on Farleigh Road;
 - Primary School, Early Years, Special Needs, Youth Facilities educational capacity¹³¹;
 - Built Sport and Leisure facilities at Backwell Leisure Centre, Scotch Horn Leisure Centre, community halls in Backwell and parking improvements at the Rodney Road shopping area;
 - Playing Pitches to improve drainage, changing and training facilities

¹²⁷ CD1.42

¹²⁸ CD9

¹²⁹ CD18.29

¹³⁰ The obligations are set out in CD18.9a and summarised in CD18.9c

¹³¹ The education contribution provides for two scenarios regarding the timing of the appeal scheme and another proposed development in the area in order to mitigate against over-payment should both schemes be developed

at Backwell Recreation Ground;

- Library facilities at Nailsea Library and the visiting mobile library;
- Travel information packs, public transport taster tickets and cycle vouchers; and
- Improvement of 12 existing structures on the public right of way network in the vicinity of the site.

306. NSC has provided a 'Section 106 Statement of Justification' (the Planning Obligations Statement) in support of all of the obligations¹³². It addresses the application of statutory requirements to the planning obligations within the S106 Agreement, including pooling for infrastructure projects, and also sets out the relevant planning guidance and policy justification.

Inspector's Conclusions

307. The numbers in square brackets in this section are references to previous paragraphs in the Report which are particularly relied upon in reaching the conclusions.

Main Considerations

308. Having regard to the reasons for refusal, the relevant policy context and the evidence to the Inquiry, the main considerations that need to be addressed are:

- a) Whether or not NSC is able to demonstrate a five-year and/or three-year supply of housing land for the area and the extent of any potential shortfall;
- b) The effect of the appeal scheme on the location strategy for new development in the District;
- c) Its effect on the character and appearance of the area; and
- d) Whether any development plan conflict and harm arising is outweighed by any material considerations including the housing land supply.

309. In broad terms, in the three following subsections I conclude against the relevant development policies and then in the final subsection deal with the weight to be attached to these policies and other material considerations.

a) Supply of Housing Land [7, 8, 17, 40, 41, 81-94, 163-191]

310. In respect to housing delivery, the Framework requires NSC to meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. Applications for housing should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if NSC cannot demonstrate a five-year supply of deliverable housing sites. The main parties disagree over whether or not NSC can do so.

311. Policy CS13 of the Core Strategy sets the housing requirement for the period 2006-26 at a minimum of 20,985 dwellings. The main parties agree that there was a shortfall on delivery against that annualised requirement at the end of 2015/16 of 2,498 dwellings and that the Sedgfield methodology should be used

¹³² CD18.9b

when calculating the five-year housing land supply. I have found no reason to disagree.

312. The other principal areas of disagreement between the main parties in regard to housing supply concern which buffer, 5 or 20%, and the level of supply that will actually be forthcoming from the sources identified by NSC. In respect to the latter point this is due to disagreement over the level of lapse rate to be applied to 'small sites with consent', the inclusion of and delivery rates from a number of sites, and the likely yields from 'change of use of rural buildings' and from 'empty homes'. As a result NSC contends for a total supply of 8,217 dwellings over the five year period while the appellant claims it to be 5,076 dwellings.
313. In summary, NSC's preferred scenario - based on a 5% buffer, which results in a five year requirement of 8,131 homes, and its assessment of anticipated delivery - indicates 5.05 years housing land supply, a surplus of 86 dwellings. In contrast, the appellant's preferred scenario - based on a 20% buffer, gives a five year requirement of 9,293 homes, and its assessment of housing delivery - indicates 2.73 years housing land supply, a deficit of 4,217 dwellings.
314. I deal firstly with the buffer and then with the various points of disagreement regarding NSC's housing land supply over the five year period.
315. I recognise that a 5% buffer was used by the Inspector when examining the remitted policies of the Core Strategy and that the complete version of the Core Strategy was adopted on that basis reasonably recently in January 2017. It appears that that approach was established at or prior to the associated hearings in June 2016. The matter has subsequently been considered in what is likely to have been some detail at the Sandford appeal and then at the Banwell appeal. Both of these appeal Inspectors concluded that a 20%, rather than 5%, buffer should be applied and on the evidence before me I agree with them. There are a number of considerations that have led me to this conclusion as outlined below.
316. As the Sandford appeal Inspector identified, the most recent examining Inspector for the Core Strategy was clear that while the five year housing land supply position was relevant to that examination insofar as he needed to know whether the remitted policies are capable of allowing for the early delivery of sites sufficient to ensure an ongoing five year supply, he did not want to replicate a detailed s78 type discussion on the subject.
317. On that basis although the examining Inspector had evidence before him on this matter and stated that he had no real evidence of persistent under-supply over the whole of the economic cycle and that NSC has had to deal with changing housing requirements so it seemed to him that the buffer should be 5%, it appears very likely that the matter was considered in significantly greater detail at the subsequent Sandford and Banwell appeals. This is supported by the reasonably detailed assessment of whether or not NSC has a record of persistent under delivery set out in the respective decision letter for those appeals. The matter was also explored at some length during the current appeal Inquiry.
318. Having considered all of the evidence before me, I find that I broadly agree with the approach adopted by the Banwell appeal Inspector on this particular point. For instance, *assessing for persistent under delivery as far back as 1996 as promoted by NSC seems unnecessary as during the last ten years there have been improving economic conditions (to 2006), high economic activity (2007/8),*

a recession (to 2011) and improving economic conditions again since 2011. I also agree that this is a reasonable period of time for avoiding any undue influence arising from a temporary or short-lived fluctuation.

319. On that basis, and given that NSC has not met the annualised housing requirement in eight out of the last ten years and as the evidence indicates that it will not do so in the following year, 2016/17, I consider that there is a record of persistent under delivery.
320. In coming to this view I have taken into account all of NSC's evidence on this matter, including that the housing requirement as it is now understood was not available for much of that ten year period and that the approach set out in the LPEG report should be favoured. However, while I recognise that the development plan policy circumstances in which NSC has operated over recent years has been challenging, in my view it is appropriate for performance to be measured against the actually housing requirement for that period rather than a figure that has been found to be unlawful by the Courts. Moreover, I give little weight to the LPEG approach as it is not planning policy at any level and with reference to the White Paper there is no reason to believe that it is likely to be adopted by the government, indeed the contrary seems most likely.
321. For these reasons, therefore, I conclude that there is currently a record of persistent under delivery and as such a buffer of 20% is applicable.
322. I turn now to the various points of contention between the main parties regarding NSC's identified sources of housing delivery over the five year period. For ease of reference I follow the order of those issues as they appear on the spreadsheet which summarises the parties' final positions on housing supply¹³³. The sources in question are all 'small consented sites', 12 of the 'large consented sites', four 'Local Plan allocations', five of the 'strategic sites', 13 of the 'emerging allocations', 'change of use of rural buildings' and 'empty homes'.
323. Regarding small consented sites both parties consider that it is appropriate to apply a lapse rate to this source but they do not agree over the rate. NSC's application of a 9% lapse rate for small sites is based on past trends, however as the appellant's housing witness identifies in his evidence¹³⁴ that approach appears to be mathematically flawed. In any event, however, although I note that the Banwell appeal Inspector favoured NSC's approach on this matter, as both parties' figures are based on a short period I am not persuaded that they offer a reliable representation of past lapse rates.
324. In the absence of a reliable figure and given that both parties agree that a lapse rate should be applied to small sites, I consider it reasonable to employ a flat rate of 10% as a proxy as is often done by my colleague Inspectors in such circumstances. The evidence shows that 148 such dwellings are under construction with 357 yet to start. Applying the 10% lapse rate to the latter figure gives a total of 469 dwellings, compared to 473 dwellings predicated by NSC. Total supply should therefore be reduced by four units from 8,217 to 8,213.
325. I deal now with the disputed 'large consented sites'. Both the Oxford Plasma

¹³³ That spreadsheet forms part of CD18.18

¹³⁴ This is set out in some detail at paras 8.27-8.45 of Mr Tiley's Proof of Evidence CD14.2

Technology and Bleadon Quarry sites are still in use but also had extant planning permission for residential development at the time of the Inquiry. Both occupants have indicated their intention to relocate. The Framework also states that sites with planning permission should be considered deliverable until permission expires¹³⁵. On this basis I consider that they should both remain in the five year housing land supply. Moreover, the timing and rates of delivery identified by NSC do not appear to be unrealistic such that no reduction is warranted.

326. It is common ground that it is appropriate to assess supply for the five year period starting from 1 April 2016, however NSC includes sites in its anticipated supply that have been consented since that base date. As the appellant identifies, there is a significant body of appeal decisions in which Inspectors have indicated that such an approach is not appropriate in the absence of proper accounting¹³⁶. I share those Inspectors' broad view that if such sites are to be included then account must also be taken of the housing requirement that has accrued during the same period. NSC has not factored in that increased requirement or the increased backlog accrued after 1 April 2016, such that there is an imbalance in its inputs and a consequential artificial inflation of its supply of housing land over the five year period in relative terms. Accordingly, all of those sites¹³⁷, which amount to 328 dwellings, should be omitted for the purposes of this exercise. Total supply should therefore be reduced from 8,213 to 7,885 homes.
327. The appellant has undertaken a detail assessment of lead-in times for large development. While it provides useful context it is no substitute for site by site assessment based on site specific evidence. Having reviewed that detailed evidence I consider that NSC's revised estimates regarding the timing and annual delivery of the remaining contested 'large sites'¹³⁸ are not unrealistic and consequently no further reduction to the anticipated delivery from the 'large consented sites' is warranted in my view.
328. There are four disputed 'Local Plan allocations' sites. The appellant has raised several issues about each of these sites. While they all appear to be legitimate concerns, having regard to the wider evidence they do not appear to be insurmountable. Consequently, on balance it seems likely that most of those sites would come forward within the five year period. Nonetheless, bearing in mind the on-going use of the Westacres Caravan Park site and as there is still no planning permission for its redevelopment, NSC's trajectory should now be delayed by a year in my view, thereby reducing delivery across the five year period by 40 homes. Total supply should therefore be reduced from 8,213 to 8,173 dwellings.
329. Five 'strategic sites' remain in contention. While NSC has amended its projections in light of the Banwell appeal decision the appellant considers that further deductions are appropriate and I recognise that there remain challenges associated with their delivery. However, although NSC's forecasts are reasonably optimistic, like the Banwell Inspector, broadly speaking I do not see them as

¹³⁵ Footnote 11 to para 47 of the Framework

¹³⁶ CD8.9 paras 11-13, CD8.10 para 30 and CD8.12 paras 20-24

¹³⁷ Coates House, Wentworth Drive, North of A368 Sandford, Wolverhill Road, Wrington Lane, Tickenham Garden and Former Royal Oak

¹³⁸ Arnolds Way Phase 2, Pudding Pie Lane East and Woodborough Farm

being necessarily unrealistic. However, there are two exceptions in my view, particularly given the passage of time since the Banwell appeal, namely 'Locking Parklands future phases' and 'Winterstoke Remainder'. As the first of these has only outline planning permission it seems unlikely, particularly in light of the general evidence on lead-in times, that it will deliver 60 dwellings in 2017/18, such that I favour the appellant's forecast delivery from this site. Regarding the latter of these sites, the latest information from the site's developer, Persimmon, gives good reason to believe that delivery will be delayed by a year compared to NSC's prediction. Consequently, I also favour the appellant's forecast for this site, which results in a reduction of 200 dwellings. Although a small point, the evidence also indicates that the 'Winterstoke Village Phase 1' site is proposed for 239 rather than 242 homes. Therefore, total supply should be reduced by 263 homes from 8,173 to 7,910 dwellings.

330. There are 11 disputed 'emerging allocations' sites, which are all housing allocations proposed in the eSAP. The eSAP has yet to reach an advanced stage and there are also outstanding objections such that in my view it carries limited weight in terms of planning policy and in the context of Framework para 216. However, as the Banwell appeal Inspector identified, sites should not be discounted merely because of objections and the inclusion of the emerging allocations appears to have been carefully researched by NSC.
331. While I note the Sandwell appeal Inspector's comments in this regard¹³⁹, I agree with the Banwell appeal Inspector that, on balance, reliance can be placed upon them for the purposes of assessing housing land supply, such that, while reasonably optimistic, they are not unrealistic for this purpose. In coming to this view, along with the wider evidence, I have taken into account the eSAP Examining Inspector's letter to NSC which post-dates the Banwell appeal¹⁴⁰. I do not see the points raised by the Examining Inspector as 'concerns' as such, as the appellant has put it, but rather matters to be addressed. In light of NSC's response to that Inspector¹⁴¹ I see no overriding reason to remove any of these sites from NSC's delivery forecast.
332. I also note that the Banwell appeal Inspector decided not to make any adjustment to NSC's forecasts regarding homes to be delivered as a result of change of use from rural buildings. However, in view of the evidence before me I favour the appellant's estimates in this regard. There are a number of reasons for this. Rural buildings are a finite resource such that at some point in time delivery of new homes from this source will decline and cease. There is no reason to believe that delivery will cease over the five years in question. Nonetheless, NSC's assumption that delivery will be constant and that consented schemes will all be implemented appears over-optimistic, particularly in the face of the appellant's evidence regarding the downward trend in the number of applications for this type of development. The appellant's evidence also indicates that there is likely to be at least some overlap from this source and from small site windfalls, a source which the appellant does not contest. Therefore, total supply should be reduced by 157 homes from 7,910 to 7,753 dwellings.
333. Regarding an empty homes allowance, the appellant maintains that the NPPG

¹³⁹ CD8.2 (particularly para 32)

¹⁴⁰ CD5.22

¹⁴¹ CD18.19a&b

indicates that such an allowance should be included in the trajectory only where this has been robustly tested through an examination. However, the NPPG actually says that when at examination of a draft Local Plan local planning authorities seeking to count the bringing of empty homes back into use against housing need would have to provide robust evidence, for example, to test the deliverability of the strategy and to avoid double counting; it does not say that it must have been through the examination process¹⁴². On that basis the key point from this part of the NPPG appears to be that the supporting evidence must be robust, and I see no reason why that approach should apply any less to the development management process than to plan-making.

334. I note that the Banwell appeal Inspector discounted this source on the evidence before him. Since then NSC has adopted a new Empty Property Delivery Plan for the period 2016-21 and its current evidence is that 180 homes will be delivered from this source over the five year period. While the adoption of the new Delivery Plan appears to be a positive step, I note that it is not an entirely new initiative as it replaces an earlier Plan produced in 2011. The figure of 180 homes is based on past trends such that it has some evidential support. However, in my view NSC's case on this aspect of potential housing delivery is not robustly evidenced in the terms of the NPPG. For instance, the evidence does not clearly test the deliverability of the strategy or demonstrate that there would be no double counting. Consequently, the allowance of 180 units from this source should be discounted and total supply reduced from 7,753 to 7,573 dwellings.
335. For the foregoing reasons, therefore, over the five years in question, the housing delivery would be 7,573 dwellings compared to a requirement of 9,293 homes, which equates to a 4.07 years housing land supply, a deficit of 1,720 dwellings.
336. The WMS also raises the question of whether or not NSC can demonstrate a three-year supply of deliverable housing sites. The main parties also dispute how this figure should be calculated. The appellant advances the approach that housing land supply should be recalculated following the same principles as for the calculation of the five-year supply but for three years only. However this would result in a proportionately worse housing land supply position compared to the five year period. Give that the WMS is clearly intended to help support relevant policies for the supply of housing in a neighbourhood plan at times when a five-year housing land supply cannot be demonstrated, the appellant's approach cannot reasonably be said to be what is intended by the WMS. Accordingly, I favour NSC's approach, which indicates a 4.07 year supply as identified above, and as such it can demonstrate a three-year supply of deliverable housing sites in the terms of the WMS.
337. I deal with the effects of the absence of a demonstrable five-year supply of housing land for the area, the extent of the shortfall and the presence of a three-year supply as part of my fourth main consideration later in my report.

b) Location Strategy for New Development [9, 21-29, 35-40, 47-54, 149-162]

338. NSC's location strategy for new development in North Somerset is set out in

¹⁴² NPPG Paragraph: 039 Reference ID: 3-039-20140306

the development plan. It includes Core Strategy Policy CS14 which establishes a settlement hierarchy with Weston-super-Mare as the focus for new housing within its urban area and at a new allocation know as Weston Villages. Below Weston-super-Mare in the hierarchy are the three towns of Clevedon, Nailsea and Portishead which act as service centres, followed by the nine Service Villages, and then other settlements and countryside.

339. The site is located adjacent to and encircled by development within the greater settlement of Backwell. It is not, however, within the defined Settlement Boundary of Backwell, as established via NSRLP Policy H/7 and retained by the Core Strategy pending any alterations as part of any future Local Plan¹⁴³.

340. Core Strategy Policy CS32 identifies Backwell as one of the nine 'Service Villages'. It allows new development within as well as adjoining the Settlement Boundaries of Service Villages subject to certain criteria. However, it adds that sites that lie outside the Settlement Boundaries for development in excess of about 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans.

341. The appeal development would very substantially exceeded the 'about 25 dwellings' threshold set out in Policy CS32. The Neighbourhood Plan does not allocate the site for housing development and nor is it currently included in the eSAP as a housing allocation. There is also no reason to believe that the proposals would fully meet any of the wider relevant exception criteria for development beyond Settlement Boundaries set out in the development plan. Consequently, in this regard the appeal scheme would be at odds with the location strategy for new development in the District, in conflict with Policy CS32 of the Core Strategy.

342. NSC considers that the proposed development would also conflict with NSRLP Policy H/7 and Core Strategy Policy CS33. While it establishes Settlement Boundaries, Policy H/7 is primarily concerned with proposed development within those Boundaries rather than beyond them such that I do not see the scheme as being directly at odds with this Policy. Similarly, Policy CS33 is concerned with the development outside the areas covered by other area based policies of the Core Strategy, including Policy CS32. On that basis, as the site is clearly covered by Policy CS32 as outlined above, I also see no direct conflict with Policy CS33 arising in this case. Nonetheless, my conclusions in respect to these policies do not alter my finding that the appeal scheme would be at odds with the location strategy in conflict with Policy CS32 as set out above.

343. I also take the view the appeal development would conflict with NP Development Policy 1 for the reasons identified by NSC [52]. In short, this Policy forms part of the development plan, and the development plan also defines the Settlement Boundaries and should be read as a whole; it admits development at a level appropriate to the size and character of the village, and 'appropriate' development is not confined to that which is within the settlement boundary; and thus it should be read consistently with Policy CS32. It follows that NP Development Policy 1 allows development of up to about 25 homes abutting the settlement boundary provided a scheme would satisfy the other criteria of Policy CS32. However, in this case the scale of the proposed development would

¹⁴³ Core Strategy paras 3.199, 3.201, 4.87 and 4.93

significantly exceed that threshold.

c) *Character and Appearance* [9-15, 20-29, 35-40, 55-80, 112-127, 180-191]

344. NSC's concerns in this regard relate to a large extent to matters of character and appearance rather than landscape impact as such. The site is reasonably self-contained, in large part due to the screening effect of the existing development that surrounds it as well as to an extent by planting and topography. For this reason, combined with the proposed location of the proposed houses and associated works to the lower lying parts of the site, and subject to careful consideration of the matters that would be reserved for future consideration, the appeal scheme would have a very limited effect on the character and appearance of the area beyond the immediate area. Indeed any such effects would be largely limited to within the site itself.

345. The undeveloped, greater part of the site is unusual in that it is surrounded by development. It is used for agricultural purposes and has many of the features that are associated with other nearby agricultural land that lies beyond the settlement. Based on the representations of local people and from what I have seen and heard during the appeal process, it appears that the two public footpaths that cross the land are well used, and this is consistent with what I observed when I visited the site¹⁴⁴. I also found that, notwithstanding the proximity of the busy A370, highway noise is not particularly noticeable within the site and that it has a reasonably tranquil quality, a point also reflected in some of submissions from interested parties.

346. Users of these rights of way are very likely to be very well aware that the site is surrounded by development as it is readily apparent as one enters and leaves the site. It is also often, at least in part, apparent when walking across the site along these footpaths. Nonetheless, for the reasons outlined above, combined with its reasonably substantial size along with the features within it, the site has a distinctly rural, countryside character and appearance. In my view its importance - both as a local resource, via the rights of way that cross it, and in terms of its contribution to the unusual countryside setting of the village - is elevated by the fact that it lies within the settlement, surrounded by the development. In short, the site is important locally in those terms and that importance stems in large part from the fact that it remains open, undeveloped countryside.

347. With reference to the Guidelines for Landscape and Visual Impact Assessment¹⁴⁵, particularly Box 5.1, the site cannot be said to display the characteristics necessary for it to be a 'valued landscape' in the terms of Framework para 109 [187-188]. However, this does not alter the importance of the site as described above.

348. While the planning application is in outline with all matters reserved except for access, the appellant's evidence is based on the scheme as shown on the revised Concept Master Plan¹⁴⁶. That Plan shows two parcels of land that would be developed for housing to the north and west of the site adjacent to the existing

¹⁴⁴ In addition to my formal site visit on 20 March 2017, as I explained during my opening on the first day of the Inquiry, I also visited the site and surrounding area on 13 March 2017.

¹⁴⁵ CD 4.1

¹⁴⁶ CD 1.5

development which lines Farleigh Road and Dark Lane. While these two proposed areas of housing would be joined via a link road and footway, they would be otherwise separated by what is currently a field through which footpath LA2/6/10 runs.

349. In addition to the link road and footway, the land that would be located between the two areas of housing is shown¹⁴⁷ as accommodating twin flood attenuation basins proposed to be located to each side of the existing right of way, as well as a 'play zone'. This land along with the remaining site located to the south and east is proposed to be open space, with a series of new footpath links shown supplementing the existing public footpaths.
350. In my view the northern/eastern area of proposed housing would be less prominent than that proposed to the west due mainly to its relative size. Nonetheless, even allowing for the proposed mitigation, the fact that both parcels of land had been developed for housing would be readily apparent to users of the existing rights of way, including the route known as the Backwell Round, as they moved through the site. This would be primarily due to the filtered views that would be available through the hedges and planting, as well as views that would be available over these landscape features and via gaps required for access and movement, particularly via the openings required to accommodate the proposed link road. While I recognise that existing housing and other development is reasonably close at hand, the appeal development would bring development, and development of a reasonably large scale, significantly closer to the users of the rights of way, which for the reasons outlined above would be readily perceived.
351. While the appellant considers that the link road and the associated footway would be low key features, regardless of their design they would nonetheless herald the presence of the two areas of housing which they are intended to serve. The flood attenuation features and play zone would also be likely to alert users of the rights of way to the presence of the homes that they would serve.
352. I acknowledge that all of these features could be very carefully designed to minimise their effect on the character and appearance of this part of the site. However, based on the evidence and my experience of such matters, no matter how carefully they might be designed, the road in particular, but also the basins, would appear as engineered forms that would sit awkwardly with the site's current rural character. These proposed features, combined with the play zone, would have a markedly urbanising effect on a portion of the site that is part of the area proposed to be designated as LGS in the eSAP. With that development there are also likely to be some additional works that would further the urbanising effect, such as street lighting and footpath surfacing.
353. In addition to their physical appearance, the use of these features, particularly the road due to the nature and frequency of vehicle movements, would also have an urbanising effect that would harm further the area's rural quality. These effects would be particularly prominent given the proximity of these proposed features to footpath LA2/6/10.
354. For these reasons therefore, while in this regard the appeal development

¹⁴⁷ As shown on the various illustrative documents submitted by the appellant, including Indicative Drainage Strategy drawing no TE/1177/400/D and Landscape Strategy drawing no 04658.00003.004.4

would have a limited effect beyond the immediate area of the site, the reasonably substantial quantum of development proposed and the resulting marked reduction in the undeveloped area of the site would significantly diminish and damage the countryside character of Farleigh Fields. For these reasons and in this context, the appeal development would be excessive in size and cause significant harm to the setting and character of Backwell. Given the site's local importance, as outlined above, that harm carries considerable weight against the appeal proposal.

355. Consequently, while matters of detailed design, layout and scale of the built form could be carefully controlled at the reserved matters stage and notwithstanding NSC's landscape officer's comments, the introduction of development of the extent and type proposed to the site would be at odds with Policies CS5 and CS32 of the Core Strategy, Policy DM10 of the DMPP Pt1, and Policy Development 1 of the NP. Although I do not see that the appeal scheme would conflict with Policy DM25 of the DMPP Pt1 in terms of the usability or safety of the rights of way, the amenity associated with their use would be detrimentally affected such that the scheme would also conflict with this development plan policy.
356. I also note that the Oldmixon Road appeal Inspector found that Core Strategy Policy CS12 and Policy DM32 of the DMPP Pt1 have no direct applicability to an outline planning application with all matters reserved but would be relevant at the reserved matters stage. I agree with him in respect to Policy CS12. However, while 'linked' to Policy CS12, I find Policy DM32 to be broader in its scope. For instance, it states, among other things, that 'proposals which cause unacceptable harm to the character or appearance of the area will not be permitted'. Accordingly, for the reasons identified, the appeal development would also conflict with DMPP Pt1 Policy DM32.
357. As explained in my 'Location Strategy for New Development' section above, there is no conflict with Policy H/7 of the NSRLP, as it is concerned with development within rather than beyond Settlement Boundaries, or with Core Strategy Policy CS33, as it is concerned with development proposed outside the areas covered by other area based policies of the Core Strategy, including CS32.
358. The evidence, both written and oral makes reference to the site being use as open space. However, the land is in private ownership and as such I have considered the appeal on the basis of public access within the site currently being formally limited to the two public rights of way that cross it.
- d) Other Issues and Planning Balance* [2, 5, 7-15, 18, 19, 29, 32, 40, 42, 93-101, 103-109, 128-147, 149-164, 192-197]
359. In undertaking the planning balance I have considered the weight to be given to the relevant development plan policies and made an assessment of whether the appeal proposal would amount to sustainable development in the terms of the Framework. In doing so I have had regard to, among other things, the absence of a Framework compliant supply of housing land and the contents of the Framework as a whole, as well as to the WMS given that I have found there to be a greater than a three-year supply of housing land. I deal with this latter point first.
360. In the context of housing land supply, the WMS states that relevant policies for

the supply of housing in a neighbourhood plan should not be deemed to be 'out-of-date' under para 49 of the Framework where all of three criteria apply. The WMS is considerably less than two years old and I have found that NSC can demonstrate a three-year supply of deliverable housing sites such that the first and third criteria are met. The second criteria relates to whether or not the NP allocates sites for housing.

361. While none of its policies specifically allocate development sites, the NP at large does nonetheless allocate sites for housing. I have come to this view primarily on the basis that the NP contains a plan entitled 'Development sites A to E' on page 13 and those five sites are identified, and that plan is referenced, at para 8.9 of the NP as *sites where residential development and in the case of Sites A and B, residential and employment development, is supported*. The 'Backwell Neighbourhood Plan Map' at page 22 of the NP, which amounts to a proposals map, also shows these sites labelled as 'potential development site', which I accept as being a 'perfectly good' description of an allocation. That Map and the NP, when read as a whole, indicates clearly what kind of development, including housing, will be permitted on each site, such that it does allocate sites for housing for the purposes of the WMS.
362. Therefore, all three criteria of the WMS are met and, consequently, any relevant policies for the supply of housing in the NP should be deemed to be 'up-to-of-date' under para 49 of the Framework. I would add that the WMS refers to policies of the NP only in this regard and makes no mention of relevant policies for the supply of housing within the wider development plan. Consequently, as NSC cannot currently demonstrate a five-year supply of deliverable housing sites relevant policies for the supply of housing in the wider development plan should not be considered 'up-to-of-date'. I return to the effect of and weight to be given to the WMS a little later, but first I deal with the effect of Framework para 49.
363. As relevant policies are 'out-of-date' or not 'up-to-of-date', the effect of para 49 of the Framework is to take the decision-taker to Framework para 14. In these circumstances and as I have not found any specific policies in the Framework indicate that the appeal development should be restricted, para 14 states that, unless material considerations indicate otherwise, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. In other words, notwithstanding the WMS, the absence of a Framework compliant supply of housing land triggers the operation of the 'tilted balance' in para 14.
364. I have identified, as outlined above, that the appeal development would conflict with Core Strategy Policies CS5 and CS32, DMPP Pt1 Policies DM10, DM25 and DM32, and NP Policy Development 1. Policies DM10, DM25 and DM32 post-date the publication of the Framework, and like Policy CS5 are now not said to be policies for the supply of housing by any of the parties. Consequently, while bearing in mind the evidence, I see no reasons why these four Policies should not carry full weight in this case.
365. Notwithstanding the Supreme Court Judgment the appellant maintains that Core Strategy Policy CS32 and NP Policy Development 1 are relevant policies for the supply of housing. Both are policies 'affecting', or at least potentially affecting, the supply of housing. However, following the 'narrow' interpretation

now required by the Supreme Court Judgment, neither is a policy 'for' the supply of housing.

366. I am also mindful that the NP was prepared at a time when the housing requirement in North Somerset was, due to the issues I have described with the Core Strategy, markedly lower than is the case now. Consequently, I broadly agree with the appellant's case that the NP is likely to plan for less housing than is required by the current version of the Core Strategy. [23, 151, 160]
367. I have, nonetheless, concluded that Policy Development 1 of the NP, as well as Core Strategy Policy CS32, carry full weight in this case. I have come to this view bearing in mind that the wider development plan provides mechanisms for the delivery of further, currently unallocated, housing development via the flexibility offered by its policies through the development management process and more significantly via the opportunities afforded by the eSAP process to identify and allocate further housing sites should they be required. When viewed in the context of the WMS and bearing in mind that I have found that NSC can demonstrate a supply of deliverable housing sites which comfortably exceeds the three-years identified in the WMS, those Policies should carry full weight.
368. I also recognise that the Settlement Boundary of Backwell is established by the NSRLP, which was adopted in 2007. Nonetheless, its retention and continued use is provided for in much more recent development policy documents, notably the Core Strategy, which also provides a mechanism for its review/alteration, for instance via the eSAP. Consequently, I see no reason to reduce the weight to be given to the Settlement Boundary or its associated development plan policies, particularly in the context described in the preceding paragraph.
369. The proposals would deliver a range of social, economic and environmental benefits including the provision of market and affordable housing in a sustainable location – particularly relative to the other Service Villages - with access to a good level and range of services and transport options, expenditure on construction and investment in the area, the creation of construction jobs, financial contributions towards off site infrastructure, the provision of public open space and green infrastructure, the enhancement of public rights of way and delivery of new public footpaths, and enhancements to biodiversity. While I recognise that those matters that would be secured via the S106 Agreement are primarily intended to respond to the needs arising from the proposed development they would also be of benefit for the wider community.
370. Assuming the development were to come forward in a timely manner¹⁴⁸, overall, I consider that, particularly bearing in mind the government's objective to boost significantly the supply of housing along with the identified need for market and affordable housing¹⁴⁹ in North Somerset, these benefits should collectively carry very significant weight in favour of the appeal proposal. Nor am I persuaded by the evidence - largely due to the considerations summarised in the preceding paragraph - that the scale of development proposed would necessarily be disproportionate to the existing settlement or that, as a matter of

¹⁴⁸ While I note the comments of the owners of 58 Farleigh Road [300], for the purposes of the balancing exercise I have assumed that any such negotiations would not delay delivery of the proposed development.

¹⁴⁹ Overall housing need is outlined in the *Supply of Housing* sub-section above and for the purposes of this exercise I have used, as a benchmark, the appellant's position regarding affordable housing need in North Somerset and Backwell, as set out in Mr Tiley's Proof of Evidence, particularly at paras 12.7 to 12.24

principle, it would have a significant effect in terms of community cohesion. I also note that many aspects and effects of the proposed scheme have been addressed to the satisfaction of NSC, statutory authorities and other consultees.

371. There are those matters which I have identified – the conflict with NSC’s location strategy for new development, the harm to the character and appearance of the area, and the associated conflict with the development plan – which must be weighed against the benefits applying the ‘tilted balance’.
372. Given the extent of harm that would arise, particularly in respect to the effect of the development on the character and appearance of the area, that I have found that the relevant Policies of the development plan carry full weight, and bearing in mind the contents of the WMS, these considerations carry substantial weight against the appeal scheme in the circumstances of the case. On this basis I find that the adverse impacts of granting the appeal development planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
373. Although not determinative, to these adverse impacts must be added the other, lesser disbenefits of the scheme which include the loss of BMV, the potential effect on the designation of the proposed LGS and the residual effect of traffic on the road network. These add further, albeit limited, weight against the scheme.

Conditions

374. Conditions to be imposed on a grant of permission were discussed at the Inquiry, which are agreed by the main parties¹⁵⁰. A set of conditions, incorporating the agreed amendments and minor improvements to wording, which are recommended in the event of the appeal being allowed is included in an Annex. I set out below a justification for the conditions.
375. In order to provide certainty, conditions requiring that the development is carried out in accordance with the approved plans, insofar as they relate to details of access including sight lines, and that the reserved matters are in general accordance with the proposed development parameters would be necessary. In the interests of highway safety and to secure an acceptable living environment for residents, conditions to secure appropriate on-site parking and circulation arrangements, and the implementation of the proposed access arrangements would also be necessary. A condition to control ground floor slab levels would also be necessary to help the development harmonise with its context and to reduce flood risk. For this latter reason conditions would also be necessary to control surface water run-off and drainage arrangements.
376. To protect the environment and to secure acceptable living conditions for residents a condition to control foul water drainage would be necessary. Conditions would also be necessary to secure the proposed arboricultural and biodiversity mitigation including details of lighting to protect the character and appearance of the area as well as trees and hedgerow and wildlife and their habitat. A condition to safeguard against unsuspected contamination that might affect the site, along with any requisite remediation, would be necessary to protect the health and well-being of future occupiers.

¹⁵⁰ CD11.1a

377. A condition would be necessary to ensure that features of archaeological interest are properly examined/recorded. A condition to secure the provision of storage refuse, recycling and composting materials would be necessary in the interests of character and appearance and of supporting recycling. The submission and approval of a Construction Method Statement would also be necessary to safeguard the living conditions of local residents and in the interests of highway safety.
378. A condition to secure micro renewable and low-carbon measures are part of the development would be necessary to safeguard the environment. To promote sustainable modes of transport and reduce the need for travel and in the interests of highway safety, conditions to secure the implementation of a Travel Plan would also be necessary.
379. However, as suggested condition Nos 15, 16, 17 and 18 relate to matters directly reserved for future consideration, they would not be necessary.

Obligations

380. I have considered the S106 Agreement in light of Regulation 122 of The Community Infrastructure Levy (CIL) Regulations 2010 (as amended) and government policy and guidance on the use of planning obligations. Having done so, I am satisfied that the obligations therein would be required by and accord with the policies set out in NSC's Planning Obligations Statement. Moreover, notwithstanding the concerns expressed locally including by BPC, having regard to the wider contents of the Planning Obligations Statement I also consider that those obligations are directly related to the proposed development, fairly and reasonably related to it and necessary to make it acceptable in planning terms. [305-306]

Overall Conclusion

381. The WMS was published considerably less than two years ago. I have found that NSC can demonstrate a housing land supply well in excess of the three-years identified therein and that the NP does allocate sites for housing. Consequently, the up-to-datedness of any relevant policies for the supply of housing within the NP are not affected in the terms of Framework para 49. Nonetheless, as NSC cannot currently demonstrate a Framework compliant supply of housing land, and given that as a consequence other policies for the supply of housing within the wider development plan are not to be considered up-to-date, the tilted balance of para 14 of the Framework is engaged.
382. The site is located adjacent to but outside of the Settlement Boundary of Backwell as established in the development plan. Consequently, given its scale and type, the appeal scheme would be at odds with the location strategy for new development in the District, contrary to Core Strategy Policy CS32 and NP Development Policy 1.
383. Although the proposals would have a limited effect beyond the immediate area and notwithstanding that matters of detail would be controlled at the reserved matters stage, given the scale and type of development proposed and the resulting marked reduction in the undeveloped area within Farleigh Fields, there would be significant harm to the character and appearance of the area resulting from the appeal development. Consequently, in that regard, it would also conflict with Core Strategy Policies CS5 and CS32, Policies DM10 and DM25 of the DMPP

Pt1 Policy, and Policy Development 1 of the NP. Moreover, I have found that all of these Policies carry full weight in the circumstances of the case.

384. In applying the 'tilted balance' I acknowledge that there are numerous matters that weigh in favour of the appeal development. Most notable among these are the delivery of affordable and market housing, and collectively these benefits weigh very significant in the appellant's favour.

385. In many respects the proposal would contribute positively to sustainable development objectives as set out in the Framework, particularly in respect to the benefits associated with housing delivery, and planning conditions and obligations could deal satisfactorily with infrastructure and many of the impacts arising.

386. Nonetheless, the WMS is clearly intended to support community-led planning and to allow communities, such as Backwell, who brought forward neighbourhood plans in advance of the WMS time to review their plans. There will also be opportunities to allocate further sites for housing via the eSAP process. As outlined above, in this context and bearing in mind that there is a four-year supply of housing sites along with the identified conflict with NSC's location strategy for new development, harm to the character and appearance of the area and development plan conflict, combined with other matters that weigh against the appeal scheme, these matters significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

Recommendation

387. I recommend that the appeal be dismissed. In the event that the Secretary of State disagrees, I recommend that the conditions set out in the attached Annex be applied to any permission granted and that the provisions of the S106 Agreement are viewed as being necessary.

G D Jones

INSPECTOR

Appearances

FOR THE APPELLANT:

Paul Cairnes, of Queens Counsel	Instructed by Pegasus Planning Group
He called	
Julian Cooper BSc(Hons)	Director of Landscape Architecture, SLR
DipLD FLI	Consulting - landscape
Graham Eves BSc CEng	Director of PFA Consulting Ltd – highways
MICE MCIHT	and transport
Neil Tiley Assoc RTPI	Associate, Pegasus Group – housing land
	supply
David Hutchison BSc(Hons)	Executive Director, Pegasus Group - planning
DipTP MRTPI	
Joshua Ashwin ¹⁵¹	Planner, Persimmon Homes

FOR THE LOCAL PLANNING AUTHORITY:

Timothy Leader, of Counsel	Instructed by Richard Kent Head of
	Development Management, North Somerset
	Council (NSC)
He called	
Michael Reep DipTPS	Planning Policy Manager, NSC – planning
BSc(Hons) MRTPI	policy
Natalie Richards	Research and Monitoring Supervisor, NSC –
	housing land supply
David Tate DipTP MA	Principal Planning Officer, NSC –
	environmental impact, sustainability and
	planning balance

FOR BACKWELL PARISH COUNCIL:

Polly Reynolds	Instructed by Backwell Parish Council
She called	
Mr M Rose	Backwell Parish Council
Mr C Perry	Backwell Parish Council

INTERESTED PERSONS:

Martin Powell	Local Resident
David Andrew	Local Resident
Rachel Beckingsale	Local Resident
Peter Hoare	Local Resident
Peter Hemmings	Local Resident
Bob Taylor	Local Resident and Chairman of BPC
Jayne Kearney	Local Resident
Norma Knight	Local Resident
Mark Mallet	Local Resident
Cyril Routley	Local Resident
Colette Howard	Local Resident

¹⁵¹ Mr Ashwin contributed to the session on Planning Conditions and S106 Agreement only

Alistair Ireland	Local Resident
James Harwood BSc(Hons) MCOptom	Local Resident
Richard MacLeavy	Local Resident
Geoff Wells	Local Resident
Mike Phillis	Local Resident
Chris Miles	Local Resident
Sarah Rees	Local Resident
Lorraine Hopkinson-Parker	Local Resident
Bill Charnock	Local Resident
Keith Riches	Local Resident
Jayne Kirkbride	Local Resident
Lisa Bates	Part owner of part of the appeal site

Documents

Core Documents

CD1 Application and Appeal Documents

CD1.1	Covering letter with application – 22.1.2015
CD1.2	Application forms – 22.1.2015
CD1.3	Notices to Owners and Tenants – 22.1.2015
CD1.4	Site Location Plan - 500-03_D
CD1.5	Concept Masterplan - 500-002_02_M
CD1.6	Constraints and Opportunities Plan - 500-002_1_E
CD1.7	Land Budget Parameter Plan - 500-002_1_H
CD1.8	Scale & Massing Parameter Plan - 500-005_E
CD1.9	Access & Movement Parameter Plan - 500-006_C
CD1.10	Density Parameter Plan - 500-007_F
CD1.11	Swept Path Analysis – P706-14_B
CD1.12	Proposed Access Cross Section Plans – P706_15
CD1.13	Proposed Pedestrian/Cycle & Crossing Points on Farleighs Road – P706_10_C
CD1.14	Proposed Access Priority Junction with Ghost Island Right Turn Lane – P706_13_C
CD1.15	Agricultural Assessment Report (Reading Agricultural Consultants, Nov 2014).
CD1.16	Archaeological Geophysical Report (Pre-Construct Geophysics – November 2014)
CD1.17	Bat Survey Report (MWA – dated January 2015).
CD1.18	Breeding Bird Report (MWA – dated January 2015).
CD1.19	Revised Design and Access Statement (RPS Group - dated July 2015).
CD1.20	Ecology Report (MWA – dated January 2015).
CD1.21	Reptile Survey Report (MWA – dated January 2015).
CD1.22	Energy Statement (E2S Consultants – dated November 2014).
CD1.23	Flood Risk Assessment (Callidus, July 2015) inc Drainage Strategy Plan 400 Rev D
CD1.24	Land Contamination and Geotechnical Risk Assessment Report (NPS Nov 2014)
CD1.25	Health Impact Assessment (RPS Group – dated January 2015)
CD1.26	Heritage Assessment (Cotswold Archaeology – dated November 2014)
CD1.27a	Landscape and Visual Impact Assessment (SLR – dated January 2015) and)
CD1.27b	LVIA Addendum (SLR - dated 29.7.2015)
CD1.27c	Landscape Strategy Plan 416 04658 00003-004_4
CD1.28	Revised Planning Statement (Charles Church - dated July 2015).
CD1.29	Statement of Community Involvement (Charles Church – dated January 2015).
CD1.30	Road Safety Audit (TMS – dated November 2014).
CD1.31	Topographical Survey Plans 1127 (Benjamin Moore Land Surveys Ltd)
CD1.32a	Transport Assessment (PFA – dated January 2015)

CD1.32b	Supplementary Transport Assessment Report (PFA- dated July 2015)
CD1.33	Travel Plan (PFA – dated January 2015).
CD1.34a	Tree Constraints Report (JP Associates – dated July 2014).
CD1.34b	Tree Survey Plan D35-22-P1 Rev A
CD1.34c	Tree Constraints Plan D35 22P2 Rev A
CD1.35	Utilities Report (Callidus – dated November 2014).
CD1.36	Overarching Lighting Strategy (Clarkson & Woods Ecological Consultants, July 15)
CD1.37	Precautionary Working Method Statement (GCN) (Clarkson & Woods Ecological Consultants – dated July 2015)
CD1.38	Applicant Covering Letter revised plans dated 29.7.2015
CD1.39	Applicant Response to Peter Evans Partnership Objection (August 2015)
CD1.40	Emails between Case Officer and Applicant (September & October 2015)
CD1.41	Ecological Letter from Clarkson & Woods dated (20.10.2015)
CD1.42	Officer's Delegated Report
CD1.43	LPA Decision Notice dated 7.6.2016

CD2 Correspondence and Documents Associated with the Appeal

CD2.1	Letter from Appellant to Taylor Wimpey dated 12.1.2017
CD2.2	Email from Taylor Wimpey to Appellants dated 19.1.2017
CD2.3	Letter from Appellant to PINS dated 9.2.2017
CD2.4	Letter from Taylor Wimpey dated 13.2.2017
CD2.5	Letter from North Somerset to Appellant dated 15.2.2017

CD3 National Planning Policy and Guidance

CD3.1	National Planning Policy Framework 2012
CD3.2	National Planning Practice Guide
CD3.3	Written Ministerial Statement by Gavin Barwell, 12 December 2016 (HCW5346)
CD3.4	DCLG "Fixing our broken housing market" February 2017

CD4 Landscape Assessment Guidance Documents

CD4.1	Guidelines for Landscape & Visual Impact Assessment - LI and IEMA 3 rd Edition
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CD5 North Somerset Council Local Planning Policies and Guidance and other relevant Local Policy Documents and studies

CD5.1	North Somerset - Replacement Local Plan "Saved Policies" (adopted March 2007
CD5.2	North Somerset - Core Strategy, Version following High Court Judgement March 2013 and Re-adoption of Policy CS13 - September 2015
CD5.3	North Somerset - Core Strategy (adopted April 2012, re-adoption in Jan 2017)
CD5.4	Inspector Report - Re-Examination of Policy CS13, 11 March 2015
CD5.4a	Appendix A - Inspector Report - Re-Examination of Policy CS13, 11 March 2015
CD5.5	Planning Inspectorate Core Strategy - Inspectors Report – 8 November 2016
CD5.5a	Appendix - Planning Inspectorate Core Strategy - Inspectors Report – 8 Nov 2016
CD5.6	North Somerset - Sites and Policies Plan Part 1: Development Management Policies (adopted 19 July 2016)
CD5.7	North Somerset - Sites and Policies Plan Part 2: Site Allocations Plan, Publication Version (October 2016)
CD5.8	North Somerset - Assessing the sustainability and settlement hierarchy of rural settlements in North Somerset, Final Report - February 2016
CD5.8a	Appendix C - Assessing the sustainability and settlement hierarchy of rural settlements in North Somerset, Final Report - February 2016
CD5.8b	North Somerset - Reviewing the sustainability and settlement hierarchy of settlements in North Somerset, Final Report – July 2016
CD5.9	North Somerset - Reviewing the sustainability and settlement hierarchy of settlements in North Somerset, Executive Summary – October 2016
CD5.10	North Somerset - Residential Site Assessments

CD5.11	'Backwell Future' Backwell Neighbourhood Plan 2014-26 (made 24 March 2015)
CD5.12	'Backwell Future' Backwell Neighbourhood Plan 2014-26 A Report to North Somerset Council of the Examination into the Backwell Neighbourhood Plan – October 2014
CD5.13	West of England - Joint Spatial Plan – Towards the emerging spatial strategy – November 2016
CD5.14	North Somerset - CC-ID/07 North Somerset Core Strategy Consequential Changes Examination - Inspector's questions for the examination – 17.6.2016
CD5.15	"Backwell Future" Backwell Neighbourhood Plan 2014-2026 – Pre-examination version – March 2014
CD5.16	Evidence Base G: New Development forming part of the report by the Independent Examiner (Nigel McGurk) October 2014
CD5.17	Evidence Base K: New Development forming part of the report by the Independent Examiner (Nigel McGurk) October 2014
CD5.18	Evidence Base L: New Development forming part of the report by the Independent Examiner (Nigel McGurk) October 2014
CD5.19	Evidence Base T: New Development forming part of the report by the Independent Examiner (Nigel McGurk) October 2014
CD5.20	Long Ashton Neighbourhood Development Plan 2013-2033 – May 2015
CD5.21a	North Somerset Planning Maps for Each Service Village
CD5.21b	North Somerset Planning Maps for Each Service Village
CD5.21c	North Somerset Planning Maps for Moor Lane
CD5.22	Inspectors Letter 6.3.2017 – Examination into the soundness of the North Somerset Site Allocations Plan
CD5.23	North Somerset Housing Strategy 2016-2021

CD6 Housing Land Availability

CD6.1	North Somerset – Residential Land Survey and Five-Year Housing Land Supply Paper April 2016
CD6.2	North Somerset and South West Strategic Development Ltd - Statement of Common Ground for Appeal at Land North of Oldmixon Road, Weston Super Mare (APP/D0121/W/16/3150985)
CD6.3	North Somerset – Five Year Land Supply Position Statement – Dec 2016 Update
CD6.4	North Somerset – Planning and Regulatory Committee Report – Land at Wrington Lane, Conglesbury (16/P/1521/O) – 8.2.2017
CD6.5	North Somerset – Planning and Regulatory Committee Report – Land at Wolverhill Road, Banwell (16/P/152744/OT2) – 8.2.2017
CD6.6	North Somerset – Planning and Regulatory Committee Report – Cothill, Station Road, Sandford, Winscombe (17/P/0023/F2) – 8.3.2017
CD6.7	North Somerset – Planning and Regulatory Committee Report – Withdale Farm, Weston Road, Congresbury (16/P/2490/O) – 8.3.2017
CD6.8	North Somerset Annual Monitoring Report 2016

CD7 Not Used

CD8 Relevant Appeal Decisions, Planning Applications and Legal Judgements

CD8.1	APP/D0121/A/99/1035049 – Land at Farleigh Road, Backwell
CD8.2	APP/D0121/W/15/3139633 - Land north of A368, Sandford, North Somerset
CD8.3	APP/D0121/W/15/3138816 – Land south of Knightscott Road, Banwell, Somerset
CD8.4	Suffolk Coastal District Council v Hopkins Homes Ltd, and Richborough Estates Partnership LLP and Cheshire East Borough Council [2016] EWCA Civ 168 (17 March 2016)
CD8.5	Solihull Metropolitan Borough Council v Gallagher Estates Ltd and Lioncourt Homes [2014] EWCA Civ 1610 (17 December 2014)
CD8.6	Stroud District Council v Secretary of State for Communities & Local Government and Gladman Developments Ltd [2015] EWHC 488 (Admin) (6 February 2015)

CD8.7	East Staffordshire Borough Council v Secretary of State for Communities & Local Government and Barwood Strategic Land [2016] EWHC 2973 (Admin) (22/11/16)
CD8.8	APP/D0121/W/16/3142927 - Land at Bleadon Hill, Weston Super Mare, BS24 9JN
CD8.9	APP/C3105/A/13/2201339 - Land North of Gaveston Gardens and Rear of Manor Farm, Banbury Road, Deddington, Oxfordshire
CD8.10	APP/D3125/W/15/3139687 - Land west of Shilton Road, Burford
CD8.11	APP/G5180/W/16/3144248 - Land to the rear of former Dylon International Premises, Station Approach, Lower Sydenham, London SE26 5HD
CD8.12	APP/W0530/A/13/2207961 - Land to the west of Cody Road, Cambridge CB25 9LS

CD9 Principal Consultation Responses on the appeal application 15/P/0315/0

CD9.1	Backwell Environment Trust - 19.8.2015
CD9.2	Backwell Parish Council – 6.3.2015
CD9.3	Backwell Parish Council – 13.3.2015
CD9.4	Backwell Parish Council – 18.3.2015
CD9.5	Backwell Parish Council – 25.8.2015
CD9.6	Environment Agency – 9.3.2015
CD9.7	Highways Agency – 6.3.2015
CD9.8	Highways England – 10.9.2015
CD9.9	Highways England 4.8.2015
CD9.10	Natural England – 12.3.2015
CD9.11	Natural England – 24.8.15
CD9.12	North Somerset - Access Officer – 25.2.2015
CD9.13	NSC Highway Comments – 17.9.2015
CD9.14	NSC Landscape Comments – 23.9.2015
CD9.15	NSC Natural Environment – 25.8.2015
CD9.16	Wessex Water – 2.3.2015
CD9.17	Wessex Water – 11.8.2015

CD10 Other Inquiry Documents

CD10.1	North Somerset - Pupil Projections for North Somerset Schools 2016-20 (June 16)
CD10.2	North Somerset – Education Provision in North Somerset, A Commissioning Strategy 2015 to 2018 (August 2015)
CD10.3	Pegasus Report to North Somerset Core Strategy Examination of Remitted Policies, Hearing Statement: Matter 2 (May 2016)

CD11 Statements of Common Ground

CD11.1	SofCG on Planning
CD11.1a	Appendix A Planning Conditions
CD11.2	SofCG Housing Land Supply

CD12 Statements of Case

CD12.1	Appellant - Planning Statement of Case - 6 th July 2016
CD12.2	Local Planning Authority - Statement of Case – January 2017
CD12.3	Rule 6 Party – Statement of Case – Backwell Parish Council
CD12.4	Rule 6 Party –Statement of Case – Taylor Wimpey

CD13 Not Used

CD14 Proofs of Evidence

CD14.1	Appellants - Proof of Evidence on Planning Matters – David Hutchison
CD14.2	Appellants – Proof of Evidence on Housing Land Supply – Neil Tiley
CD14.3	Appellants - Proof of Evidence on Transportation Matters – G Eves
CD14.4	Appellants – Proof of Evidence on Landscape – Julian Cooper

CD14.5	NSC- Proof of evidence – Planning – D Tate
CD14.6	NSC- Proof of evidence – Planning Policy – M Reep
CD14.7	NSC- Proof of evidence – Housing Land Supply – N Richards
CD14.8	Rule 6 Party – Proof of Evidence –M Rose, Backwell Parish Council
CD14.9	Rule 6 Party – Proof of Evidence –C Perry, Backwell Parish Council

CD15 Appendices to Proofs of Evidence

CD15.1	Appellants – Appendices to Proof of Evidence on Planning – D Hutchison
CD15.2	Appellants – Appendices to Proof of Evidence on Housing Land Supply – N Tiley
CD15.3	Appellants – Appendices to Proof of Evidence on Transportation Matters – G Eves
CD15.4	Appellants – Appendices to Proof of Evidence on Landscape Matters – J Cooper
CD15.5	NSC- Appendices Proof of evidence – Planning – D Tate
CD15.6	Rule 6 Party –Appendices to Proof of Evidence –M Rose, Backwell Parish Council
CD15.7	Rule 6 Party – Appendices to Proof of Evidence –C Perry, Backwell Parish Council

CD16 Summary Proofs of Evidence

CD16.1	Appellants – Summary Proof of Evidence on Planning Matters – David Hutchison
CD16.2	Appellants – Summary Proof of Evidence on Housing Land Supply – Neil Tiley
CD16.3	Appellants - Summary Proof of Evidence on Transportation Matters – G Eves
CD16.4	NSC- Summary Proof of evidence – Planning – D Tate
CD16.5	NSC- Summary Proof of evidence – Planning Policy – M Reep
CD16.6	NSC- Summary Proof of evidence – Housing Land Supply – N Richards
CD16.7	Rule 6 Party – Summary Proof of Evidence –M Rose, Backwell Parish Council
CD16.8	Rule 6 Party – Summary Proof of Evidence –C Perry. Backwell Parish Council

CD17 Rebuttal Proofs including Appendices

CD17.1	NSC – N Richards Rebuttal – Housing Land Supply
CD17.2	Appellant – N Tiley – Errata
CD17.3	NSC – M Reep Rebuttal – Planning Policy

CD18 Documents Submitted During Inquiry

CD18.1	NSC Map showing Photo Viewpoints dated 9.3.2017
CD18.2	NSC – Habitats Regulation Assessment (Updated and finalised March 2017)
CD18.3a	Appellant Site Specifics – SCOTCH Table
CD18.3b	NSC Site Specifics – SCOTCH Table
CD18.4	Site Allocations Plan 2006-2026: Publication Version November 2016 – Comment from NHS dated 19.12.2016
CD18.5a	Appellant Aerial View of Open Space (416.04658.00003.007.0)
CD18.5b	Appellant Photos (416.04658.00003.008.0)
CD18.5c	Appellant Extract from DAS – Cross Section Plan
CD18.6	Appellant Email – Neil Tiley on affordable housing definitions, 13 March 2017
CD18.7	Site Assessment for Neighbourhood Plans: A Toolkit for Neighbourhood Planners
CD18.8	Pack of scripts read by speakers at the Inquiry
CD18.9a	Section 106 Agreement dated 22.3.2017
CD18.9b	Section 106 Justification
CD18.9c	S106 Summary
CD18.10	2000 Appeal Scheme – Application Boundary and Site Plans
CD18.11	Illustrative Layout from 2000 Appeal Scheme
CD18.12	Woodspring Local Plan – Report of the Public Local Inquiry into Objections to the Plan – relating to Farleighs Field, dated 1998
CD18.13	NSC Woodspring Local Plan Inspectors Report – Statement of Decisions and Reasons dated June 1999.
CD18.14	NSC Table of Record of Delivery
CD18.15	Photograph provided by Mr Miles
CD18.16a	PINS Letter Notifying of Recovery of Appeal dated 21 March 2017

CD18.16b	Notification of SoS recovering the appeal dated 20 March 2017
CD18.16c	Letter from Secretary of State to Dr L Fox MP dated 19.12.2016
CD18.16d	Letter from Dr L Fox MP to the Secretary of State dated 30 November 2016
CD18.16e	Letter from Temple Bright Solicitors to Dr L Fox MP dated 15 November 2016
CD18.17	Previous Planning Application Decision Letters Reference 1016/84 dated 12 th April 1984 and Reference 2116/85 dated 5 September 1985.
CD18.18	Bundle relating to 'Points of Clarification' on 5YRHLS Matters
CD18.19a	Council's Response to Inspector Burden dated 21 March 2017
CD18.19b	Appendix to Council's response to Inspector Burden
CD18.20	Maps of Winscombe Allocation and Planning Permission
CD18.21	Closing Submissions for Aylesbury Vale Appeal and covering note
CD18.22	South Oxfordshire District Council v Secretary of State for Communities and Local Government and Cemex Properties Limited EWHC 1173 (Admin) (19 th May 2016)
CD18.23	Bloor Homes East Midlands Ltd v Secretary of State for Communities and Local Government and Hinckley and Bosworth Borough Council EWHC 754 (Admin) (19 March 2014)
CD18.24	Trustees of the Barker Mill Estate v Test Valley Borough Council and Secretary of State for Communities and Local Government EWHC 3028 (Admin) (25/11/2016)
CD18.25	Approach to Calculating 5 Year Housing Land Supply, Appendix 13 to 'Local Plans Report to Government', Local Plans Expert Group, March 2016
CD18.26	Parking Standards SPD, NSC, November 2013
CD18.27	Plans to be attached to the S106 Agreement
CD18.28	Map of rights of way
CD18.29	Final Suggested Conditions

Plans

- Location: Dwg No 500_003 rev D
- Site Access: Dwg No P706/10 Rev C, and Dwg No P706/13 Rev C
- Illustrative drawings, including Masterplan: Dwg 500_002_2 Rev M

Inspector's Documents

- INSP.1 Wallet of appeal representations
- INSP.2 Closing Submissions on Behalf of North Somerset Council
- INSP.3 Closing Submissions on Behalf of Backwell Parish Council
- INSP.4 Closing Submissions on Behalf of the Appellant
- INSP.5 Responses of (a) Backwell Parish Council, (b) North Somerset Council, and (c) the appellant to the Supreme Court Judgment of 10 May 2017
- INSP.6 Appeal decision ref APP/D0121/W/16/3150985, dated 10 April 2017

Annex: Recommended conditions

1. Application(s) for approval of the reserved matters shall be made to the Local Planning Authority before the expiry of three years from the date of this permission.
2. The development hereby permitted shall be begun before the expiry of two years from the date of approval of the last of the reserved matters to be approved.
3. Approval of the details of the layout, scale and appearance of the buildings, and the landscaping of any given part of the site (hereinafter called 'the reserved matters') shall be obtained from the Local Planning Authority (LPA), in writing before any development in that part of the site is commenced unless otherwise approved in writing by the LPA.
4. The development hereby permitted shall, unless otherwise subsequently approved by the Local Planning Authority in writing, be carried out in accordance with the following approved plans:
 - Site Plan (ref: 500_003-D)
 - Proposed Pedestrian/Cycle & Crossing Points on Farleigh Road (ref: P706/10 Rev C)
 - Proposed Access Priority Junction with Ghost Island Right Turn Lane (ref: P706/13 Rev C)
 - Swept Path Analysis (ref: P706/14)
 - Traffic Calming Scheme (ref: P706/16.
 - Highway Dedication Plan (ref: P706/17)
5. Applications for approval of Reserved Matters submitted pursuant to Condition 3 shall be in general accordance with the following approved Parameter Plans unless variations thereto are approved by the Local Planning Authority (LPA) as part of the Reserved Matter applications or where approved by the LPA to comply with the requirements of the other conditions listed in this decision notice:

• Land Budget Parameter Plan	500_002_1_H
• Concept Masterplan	500_002_2_M
• Scale & Massing Parameter Plan	500_005_E
• Access & Movement Parameter Plan	500_006_C
• Density Parameter Plan	500_007_F
6. No dwelling shall be occupied until sight lines have been provided at the junction between the new means of vehicular access and Farleigh Road in accordance with the approved plans.
7. Before occupation, each dwelling shall be provided with a properly consolidated and surfaced parking area at a ratio of no less than 1 space for a 1 bedroom dwelling, 2 spaces for a 2 or 3 bedroom dwelling and 3 spaces for a 4+ bedroom dwelling unless otherwise approved via the reserved matters. The internal footprint measurements for the garages shall be no less than 3.0 x 7.0 metres. The access and parking spaces shall be used for no other purpose.
8. No development shall commence on site until details of the estate roads, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, vehicle overhang margins, embankments, visibility splays, accesses, carriageway gradients, for provision of such works, have been submitted to and approved by the Local Planning

Authority. No dwelling shall be first occupied until the above approved works which serve that dwelling have been implemented in full, unless an alternative timetable is approved in those details.

9. No dwelling shall be occupied until the surface of the public footpath ref. LA2/6/10 has been improved and enhanced in accordance with details to be submitted to and approved by the Local Planning Authority.
10. All reserved matters applications shall include details of the proposed ground floor slab levels for the proposed dwellings.
11. The development hereby permitted shall not commence until details of the design, implementation, maintenance and management of the sustainable drainage scheme which takes water off site at greenfield run off rates and volumes, taking into account climate change, long term storage and urban creep has been submitted to and approved in writing by the Local Planning Authority.
12. The drainage system hereby approved shall not be constructed until the pre-construction requirements have either been; submitted to and approved by the Local Planning Authority, or adhered to as stipulated within the requirement.
13. The drainage system must be maintained by the developer prior to the management company adoption to ensure it functions as designed. The maintenance requirements must have either been submitted to and accepted by the Local Planning Authority or adhered to as stipulated within the requirement prior to handing over to the management company.
14. No dwelling shall be occupied until a scheme for the disposal of foul water has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall, thereafter, be implemented in accordance with its requirements and recommendations.
15. Details of external lighting, including temporary/construction and permanent lighting, shall be provided at Reserved Matters stage including:
 - Details of the type and location of the proposed lighting;
 - Existing lux levels affecting the site;
 - The proposed lux levels; and
 - Lighting contour plans.

This scheme shall ensure that light levels do not exceed 0.5 lux (and ideally are maintained at below 0.04 lux) along the boundary hedgerows and habitats (most importantly the southern and western boundaries) to permit continued foraging and commuting of horseshoe bats across the landscape. Details shall be submitted to and approved in writing by the Local Planning Authority (LPA). Any external lighting shall be installed and operated in accordance with the approved details and shall not be varied without approval in writing by the LPA.
16. Before the commencement of development, a Landscape and Ecological Management Plan shall be submitted and approved in writing by the Local Planning Authority (LPA). The Plan shall include measures for establishment and management of semi-natural habitats within the site, including planting schedules that include early establishment and protection of boundary habitats; a timetable for implementation and details of ongoing management. This shall also include details of design and planting of waterbodies within the site, location of bird nesting and bat roosting features and other measures to maximise biodiversity interest including continued use of part of the site for

cattle grazing as part of the proposed Bat Mitigation. The Plan shall include a pre-commencement badger survey of the site and surrounding area of relevance, and a report detailing the findings and proposed avoidance, mitigation and compensation measures shall be provided to the LPA. The reporting process shall include a timetable for management activities as well as a monitoring schedule.

17. If, during development, contamination not previously identified is found to be present at the site then no further development, unless otherwise approved in writing with the Local Planning Authority (LPA) shall be carried out until the developer has submitted a remediation strategy to the LPA detailing how this unsuspected contamination shall be dealt with and obtained written approval from the LPA. The remediation strategy shall be implemented as approved.
18. The developer shall notify the Local Planning Authority (LPA) not less than seven days before the commencement of development and shall afford access at all times to any archaeologist nominated by the LPA, and allow him or her to observe the initial excavations and record items of interest and finds.
19. No development comprising the erection of dwellings shall commence on site until details of the storage of refuse, recycling and composting, including details of location, size, means of enclosure and materials, have been submitted to and approved in writing to the Local Planning Authority. No dwelling shall be first occupied until the approved refuse, recycling and composting storage for that dwelling has been completed and made available for use in accordance with the approved details and it shall be subsequently maintained in accordance with the approved details thereafter.
20. No development shall take place, until a Construction Method Statement has been submitted to, and approved in writing by, the Local Planning Authority (LPA). The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
 - The parking of vehicles of site operatives and visitors;
 - Loading and unloading of plant and materials;
 - storage of plant and materials used in constructing the development;
 - The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - Wheel washing facilities;
 - Measures to control the emission of dust and dirt during construction;
 - A scheme for recycling/disposing of waste resulting from demolition and construction works;
 - Measures to control noise from works on the site; and
 - A plan showing measures for habitat protection and retention shall be provided, including protection and retention of at least 5m buffer zones from hedgerows.Once approved, the CMS shall be adhered to at all times, with any amendments approved in writing by the LPA before proceeding.
21. No dwelling hereby approved shall be occupied until measures to generate 15% or less, if approved by the Local Planning Authority (LPA) of the energy required by the use of the overall development (measured in carbon) through the use of micro renewable or low-carbon technologies and a programme for their implementation have been submitted to and approved in writing by the LPA. Once approved the measures shall be installed on site and become fully operational in accordance with the approved details and programme.

- Thereafter, the approved technologies shall be permanently retained unless otherwise first approved in writing by the LPA.
22. The dwellings shall not be occupied until a Travel Plan for the new residents, which seeks to reduce the number of vehicle trips to and from the site, has been submitted to and approved by the Local Planning Authority (LPA). The Travel Plan should include an information pack and green vouchers distribution mechanism and the appointment of a travel plan co-ordinator who shall establish a suitable travel plan review and monitoring framework. Upon approval, the development shall thereafter be in accordance with the proposals in the approved Travel Plan unless amendments to the Travel Plan are first submitted to and approved by the LPA.
23. The development shall proceed in strict accordance with the avoidance, mitigation and enhancement measures set out in the following Michael Woods Associates (MWAs) ecological survey reports: Section 7 of the Bat Survey Report (2015); Section 6 of the Breeding Bird Survey (2015); and Section 6 of the Reptile Survey (2015), which must be implemented through the relevant ecological conditions (site enabling, construction, lighting and landscaping plans). If amendments to the methodology are required, details of the changes must be submitted in writing and approved by the Local Planning Authority before relevant works proceed. The development shall then be implemented in accordance with the approved changes.
24. Prior to the commencement of development, a site enabling/vegetation clearance Plan, to include:
- Update protected species surveys (bats, reptiles, badgers) /checks required to inform: demolition of buildings, site clearance and species method statements if the existing surveys have become out of date
 - Timings and details of precautionary avoidance and mitigation measures required to avoid harm to legally protected (e.g. bats, reptiles, badgers, nesting birds, great crested newt), Section 41 species (e.g. common toad, brown hare, hedgehog) and wild mammals;
 - A detailed method statement for translocation of reptiles; and
 - Ecological supervision of vegetation and site clearance, with structural vegetation lowered by stages (scrub to 15cm within winter period) and regularly maintained as unsuitable habitat.
- The use of herbicides is to be avoided. Plan shall be submitted to the Local Planning Authority in writing and implemented in accordance with the submitted details.
25. A Construction Environment Management Plan (CEMP) shall be submitted to and approved by the Local Planning Authority prior to commencement of development. This shall include:
- Surveys/ walk over checks that may be required to inform avoidance and mitigation measures; methods of works;
 - Siting and installation of services such as drainage;
 - Sensitive storage locations for materials and soils (shown on submitted plans);
 - Measures for dust control, disposal of waste;
 - Prevention of pollution, to protect surface waters and ground waters, in accordance with best practice;
 - All measures for avoidance and mitigation of harm to legally protected and Section 41 species and wild mammals;

- Specification of buffers and fencing for the protection of ecological features and trees; and
- Details of the appointment of an Ecological Clerk of Works with overall responsibility for the successful implementation of the CEMP, to advise project management staff and contractors on ecological issues, and to ensure mitigation measures are implemented correctly.

Works shall be implemented in strict accordance with the approved details/methodology.

26. Prior to the commencement of development, an updated/amended landscaping and ecological management plan (LEMP) for the site shall be submitted to and approved in writing by the Local Planning Authority. The aim of the LEMP is to secure the long term safeguarding and management of on-site retained and created habitats. The LEMP shall include:
- The landscaping specification to including details of species, planting requirements, monitoring and replacement;
 - Site and habitat management objectives;
 - Detail of the annual work plans for ongoing annual management requirements;
 - Specifications for:
 - The creation and monitoring of new habitat features; and
 - An on-site notice board detailing habitats and management (with exception of bat roost which is sensitive);
 - Sign-off completion statement by ecological consultant;
 - Monitoring proposals, to include monitoring of light levels within retained bat habitats in years 1, 2 and 5 of the operational phase; with provision for remedial additional planting should light levels exceed 1 lux within retained horseshoe bat habitats;
 - A planting and maintenance schedule for the SuDS scheme; and
 - A plan of showing locations of bird, bat and hedgehog boxes and provision for annual checks and replacement where necessary of bird nesting and bat roosting features.
- Ongoing management shall be carried out in accordance with the approved details.
27. No other development hereby approved shall commence until the first 20m of the proposed Farleigh Road access works shown on drawing P706/13C, or other such arrangement approved in writing by the Local Planning Authority, has been completed to at least binder course level.
28. Prior to the first occupation the pedestrian and cycle access on drawing P706/10, or other such arrangement approved by the Local Planning Authority (LPA), has been constructed to the satisfaction of the LPA.



Ministry of Housing, Communities & Local Government

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RIGHT TO CHALLENGE THE DECISION IN THE HIGH COURT

These notes are provided for guidance only and apply only to challenges under the legislation specified. If you require further advice on making any High Court challenge, or making an application for Judicial Review, you should consult a solicitor or other advisor or contact the Crown Office at the Royal Courts of Justice, Queens Bench Division, Strand, London, WC2 2LL (0207 947 6000).

The attached decision is final unless it is successfully challenged in the Courts. The Secretary of State cannot amend or interpret the decision. It may be redetermined by the Secretary of State only if the decision is quashed by the Courts. However, if it is redetermined, it does not necessarily follow that the original decision will be reversed.

SECTION 1: PLANNING APPEALS AND CALLED-IN PLANNING APPLICATIONS

The decision may be challenged by making an application for permission to the High Court under section 288 of the Town and Country Planning Act 1990 (the TCP Act).

Challenges under Section 288 of the TCP Act

With the permission of the High Court under section 288 of the TCP Act, decisions on called-in applications under section 77 of the TCP Act (planning), appeals under section 78 (planning) may be challenged. Any person aggrieved by the decision may question the validity of the decision on the grounds that it is not within the powers of the Act or that any of the relevant requirements have not been complied with in relation to the decision. An application for leave under this section must be made within six weeks from the day after the date of the decision.

SECTION 2: ENFORCEMENT APPEALS

Challenges under Section 289 of the TCP Act

Decisions on recovered enforcement appeals under all grounds can be challenged under section 289 of the TCP Act. To challenge the enforcement decision, permission must first be obtained from the Court. If the Court does not consider that there is an arguable case, it may refuse permission. Application for leave to make a challenge must be received by the Administrative Court within 28 days of the decision, unless the Court extends this period.

SECTION 3: AWARDS OF COSTS

A challenge to the decision on an application for an award of costs which is connected with a decision under section 77 or 78 of the TCP Act can be made under section 288 of the TCP Act if permission of the High Court is granted.

SECTION 4: INSPECTION OF DOCUMENTS

Where an inquiry or hearing has been held any person who is entitled to be notified of the decision has a statutory right to view the documents, photographs and plans listed in the appendix to the Inspector's report of the inquiry or hearing within 6 weeks of the day after the date of the decision. If you are such a person and you wish to view the documents you should get in touch with the office at the address from which the decision was issued, as shown on the letterhead on the decision letter, quoting the reference number and stating the day and time you wish to visit. At least 3 days notice should be given, if possible.

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix IV



Appeal Decision

Inquiry Held on 24– 27 April and 1 May 2018

Site visit made on 27 April 2018

by Louise Nurser BA (Hons) Dip UP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 18 June 2018

Appeal Ref: APP/D0121/W/17/3184845

Weston Business Park, Laneys Drive, Locking, North Somerset BS24 8RA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission.
 - The appeal is made by Ms Donna Wall (Moor Park (North Somerset) Ltd) against North Somerset Council.
 - The application Ref 16/P/0329/O, is dated 23 December 2015.
 - The development proposed is mixed use development comprising uses within some or all of Classes C3 (Residential), Offices (Class B1), Gymnasium (Class D2), Crèche (Class D1), Café (Class A3) and Hotel (Class C1), with associated car parking, means of access, access roads, infrastructure works and landscaping.
-

Decision

1. The appeal is dismissed and planning permission is refused.

Procedural Matters

2. All matters other than access are reserved for future determination. I have dealt with the appeal on that basis, and have treated the accompanying illustrative masterplan as such.
3. The Council did not issue a decision in relation to the appeal proposal. Nonetheless, within its Statement of Case, the Council notes that, had it been in a position to do so, it would have refused planning permission for three reasons. These are impact on the strategic gap/ openness; consistency with settlement policy; and the lack of an appropriate S106 agreement to provide for on-site affordable housing provision and financial contributions to mitigate the impact of the development.
4. On April 10 2018, after the planning appeal against the non-determination of the planning application had been made, the North Somerset Sites and Policies Plan, Part 2 Site Allocations Plan, 2006-2026 (SAP) was adopted. Consequently, the development plan consists of the policies of the North Somerset Core Strategy (CS), adopted January 2017, the North Somerset Sites and Policies Plan Part 1: Development Management Policies (DMP), adopted 2016, and the SAP. The West of England Joint Spatial Plan has also been submitted to the Secretary of State. However, both parties attribute little or no weight to this in relation to the appeal before me and I see no reason to depart from this agreed position.

5. I undertook an accompanied site visit. However, prior to, and during the Public Inquiry I made unaccompanied visits to the site and around the wider area, including Haywood Village and Locking Parklands Village. Also, as requested by both main parties, I visited the following sites: Bleadon Quarry, Bleadon; Oxford Plasma, Yatton; and land to the rear of Locking Road, Weston-super-Mare.
6. Following the Inquiry a signed copy of a Unilateral Undertaking relating to the provision of affordable housing and financial contributions towards sustainable transport was provided. This would address the Council's final putative reason for refusal.
7. In addition, as requested, I received a final version of the proposed conditions that had been discussed during the Inquiry.
8. I have been referred to both the draft National Planning Policy Framework and the accompanying draft guidance. However, as both documents are yet to be finalised, I afford them little weight at this time and have relied on extant national planning policy and guidance.
9. Reference has been made to a number of historic appeal decisions which are directly related to the appeal site, and to the Examining Inspector's Reports in the lead up to the adoption of NSC's development plan. Whilst these serve as useful background documents I have determined the appeal on the basis of the policies within the adopted development plan and other material considerations.

Main Issues

10. The main issues are a) whether the appeal site represents an appropriate location for the development proposed, with particular reference to the effect of the proposal on the integrity and function of the Strategic Gap, and on the development strategy of the development plan b) whether the Council is able to demonstrate a 5 year supply of deliverable housing sites and c) whether any development plan conflict and harm arising is outweighed by other material considerations.

Reasons

Location of development

11. The Core Strategy sets out a clear locational strategy for new development in North Somerset. Policy CS33 of the CS seeks to strictly control new development outside the areas specified in Policies CS28- CS32 in order to protect the character of the rural areas and to prevent unsustainable development. It is common ground between both parties that the appeal proposal is contrary to this policy, and there is nothing before me to suggest I should come to a different conclusion.
12. A major plank of the development strategy of the adopted plan is to identify large scale developments at the Weston Villages. A number of Strategic Gaps are established through Policy CS19 of the CS the purpose of which is to help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements. The Strategic Gap, between the settlement boundary of Weston-Super-Mare, Hutton, Locking and Parklands as defined on the Policies Map and referred to within Policy SA7 of the SAP is of direct

relevance to this appeal. This is because part of the proposed development falls on land which is part of the Strategic Gap.

13. Notwithstanding that the appeal proposal is in outline, with only the access subject to detailed consideration, I have carefully considered the likely impact, both individually and cumulatively, of development at the appeal site upon the purpose of the Strategic Gap.
14. The appeal site is formed of three parcels. I will refer to them as parcels A, B and C. Of these, parcels A and C form part of the Weston Business Park (WBP). This is a long established employment use, where the principle of development has been established and is consequently, together with the larger of the Helicopter Museum's (HM) buildings immediately to the north, excluded from the defined Strategic Gap. The Oaktree Residential Park (ORP) to the south is similarly excluded.
15. This leaves Parcel B which is sandwiched between the ORP and the WBP and is defined as part of the Strategic Gap and forms the focus of my consideration.
16. From what I saw on my site visits, and from the evidence presented to me, it is clear that there is a close visual relationship between Parcel B and existing, planned, permitted and potential developments, such as to Area A of the WBP.
17. However, in my judgement, the proximity of planned and existing developments, does not suggest that the Gap is compromised, nor that reliance should be placed on the area of moorland to the south of ORP to fulfil the function and purpose of the Gap. Rather, it illustrates that the Strategic Gap at this point is particularly important in ensuring that the wider gap, between the extensive planned employment uses and Locking, which is clearly fragmented by existing blocks of built development, which are excluded from the Gap, is not further compromised through incremental development. Indeed, Mr Enderby's Appendix 4 illustrates the relatively narrow distance between the edge of the appeal site and the WBP, the ORP and Locking Village.
18. It also demonstrates that the construction of the proposed housing on almost the full extent of Area B would result in a block of built up development extending from the Helicopter Museum to the north through to the Oaktree Residential Park to the south. This replacement of an extensive area of predominantly undeveloped open land with built development would substantially reduce the extent of the Strategic Gap, and, insofar as it is possible to consider this from illustrative plans, would only leave a relatively limited tranche of land without built development. As the gap between the two sites would be substantially narrowed, this would both individually and cumulatively, compromise the ability to retain the separate identity of the existing and planned developments within the wider gap, and that of Locking in particular, which retains a separate identity.
19. I note that the proposed development would not directly front the A371, as an area of agricultural land between the entrance to the Locking Village and the roundabout which serves WBP, and ORP would be retained. Nonetheless, the residential element of the development, whilst I accept it would not appear prominent when leaving Weston-Super- Mare and travelling through the Gap, would be significantly more visible when approaching from the south. Therefore, it would incrementally add to the impact of other developments described at length by the appellants. This would reduce the perception, and the

- reality, of the gap between, the existing and planned development, and the village of Locking.
20. I have also found that the proposed development would result in an acute localised impact when viewed from the ORP and Laney's Drove. However, to my mind, the most significant impact of the loss of this element of the Strategic Gap, which extends across the other side of the A371 to the A370 and to Locking Parklands, as well as to the western edge of the village of Locking, would be when viewed from the masterplanned Haywood Village. An example of this is when travelling along the Runway towards the A371, and when experienced from the area of open land to the south of the Runway. Even with all the housing within Haywood Village not being complete, I noticed this open land was highly popular with dog walkers and others exercising.
 21. The gap at this point has already been compromised to some extent by the Helicopter Museum, the WBP and the ORP. However, the existence of these established uses, together with the relatively minor impact of the permitted development related to the Helicopter Museum, are not justification for the '*baby being thrown out with the bathwater*', by constructing housing at a particularly sensitive part of the Strategic Gap. This would further undermine its function as a means of ensuring that incremental development does not result in the loss of the separate identities of established villages such as, in this case, Locking, and the wider planned development, including the strategic sites at Locking Parklands and Haywood Village.
 22. When viewed from Hutton, due to the distance and relative changes in height the proposed development would have little significant impact on the perception of the Gap.
 23. The broad location of the Strategic Gaps had been set within the CS and were therefore not before the Examining Inspector who considered the soundness of the SAP. However, where changes to a policy, particular to a specific area, are required to make a plan sound, corresponding changes to the Policies Map follow. Indeed, such a change took place to land to the south and south east of ORP where the strategic gap was extended, and elsewhere, in another instance, where it was reduced.
 24. Moreover, from the evidence before the Examining Inspector, she would have been well aware of the physical proximity of both the existing and planned developments, in the immediate environs of the appeal site, including the extent of the developable area of the WBP. All these considerations would be relevant to the delineation and purpose of the Strategic Gap, when she concluded, subject to Main Modifications, the extent of the boundaries to the Strategic Gaps, including Parcel B of the appeal site, are coherent, and justified.
 25. It has also been put to me that there is no support for the principle of a Strategic Gap policy within the Framework, and Inspector Burden in her report into the SAP confirms, "*that there is no national policy for the provision of strategic gaps, or encouragement in Government policy*¹". However, she then goes on to conclude the review of the eJSP will be the arena in which to reconsider the principle of continuing with such a designation. Clearly, this is the correct approach. Similarly, it is not for me to consider whether such a

¹ CD5.2 North Somerset Council Sites and Allocations Plan, Inspector's Report February 2018, Paragraph 101

policy is Framework compliant. Moreover, as it stands, the current CS, which provides for the principle of a SG within Policy CS19, sits within a Framework compliant plan, which has then been refined through the SAP.

26. Consequently, I have sympathy with the Council's argument, that the Framework is not a compendium of approved policies to be inserted into local development plans. Otherwise, this flies in the face of Paragraph 150 of the Framework. Evidently, policies must be Framework compliant in order to have been found sound. However, they need not be Framework identical. I have been referred to the Crawley Down appeals², but consider the policy context to be different in the instance before me.
27. In this case, it is clear from what I have seen and heard and in particular when undertaking my site visits, that the planned development within North Somerset and close to Weston-super-Mare is such that this particular Strategic Gap, and this particular site within it, plays a significant role in ensuring that the environmental impact of unplanned growth does not cause significant and adverse harm.
28. I conclude that the location of the appeal site would not be an appropriate location for the specific development proposed, with particular reference to the effect of the proposal on the integrity and function of the Strategic Gap, and on the development strategy of the development plan. The appeal proposal would, therefore, be contrary to Policies CS33 and CS19 of the CS, and Policy SA7 of the SAP, the requirements of which are outlined above.

Supply of housing

29. The main parties produced a Position Statement on Housing Land Supply in which they agreed that the appropriate quantum of housing, against which the five year supply of deliverable land is to be calculated is 20,985 dwellings from 2006- 2026. However, the appellant suggests that this figure may not be '*Framework compliant*', and therefore the weight to be accorded to this policy must as a necessity be reduced³. However, I have taken a straightforward approach to this. The figure is derived from a plan, whose policies were finally adopted in 2017. The Secretary of State had concluded in his letter to the Leader of North Somerset Council (NSC) that he was, '*satisfied that the Inspector's recommendation, set out in his report of 11 March 2015, apply and reflect national policy correctly*'⁴. There is no substantive evidence before me which would suggest that I should disregard this conclusion and, thus, treat the housing figures set out in CS13 of the adopted development plan, which was the subject of a '*thorough review*' by the Government, as out-of-date, in principle.
30. A review of the adopted development plan has taken place, and the emerging policies are currently under examination. Clearly, by its very nature, additional evidence setting out housing needs has been submitted to support the Examination of the emerging Joint Spatial Plan and this will be the subject of debate. Going forward, the Examination in Public is the appropriate arena in which to consider the detailed arguments relating to the suitable quantum of

² CD3.11 App/D3830/V/16/3149759 and 314/5499

³ Neil Tiley Proof of Evidence paragraph 6.3

⁴ Natalie Richards Proof of Evidence Appendix 2 Paragraph 3.

objectively assessed need for housing, including consideration of the relevance or applicability of the Government's proposals for a standardised methodology.

31. There is also agreement between the main parties that the Sedgefield approach should be applied and a buffer of 20% is appropriate. I agree.
32. The Council considers that it has a deliverable supply of 5.00 years and the Appellant a supply of 3.41 years, when assessed against the period 1st October 2017 to 30th September 2022.
33. The main areas of dispute relate to the exact calculation of the five year requirement; the rate at which small sites with consent will lapse; the small site allowance; the contribution from the change of use of rural buildings and empty homes; and the level of housing to be delivered within large sites with consent, strategic sites and allocations.
34. Prior to the Inquiry, a Secretary of State decision was published which is of direct relevance to the appeal before me, given that the same witnesses had appeared before the Inspector at the Farnleigh Fields appeal⁵.

Exact calculation of requirement

35. There is a difference of five dwellings between the Council's calculation of the five year housing requirement and that of the appellant. The difference results from the Council rounding down the CS figure of 20,095 over 20 years to 1,049 dwellings per annum (dpa), rather than the more accurate 1,049.25 dpa. When this approach is used to calculate both the backlog and the future five year requirement, this has a marginal impact. However, the appellant's calculation is more accurate and should therefore be used. The resultant figure is a requirement of 9,751 deliverable dwellings to provide a five year supply. This reduces the Council's supply of deliverable housing to provide a surplus of two units.

Lapse rate

36. There was much discussion relating to the lapse rate of small consented sites. In common with the Farleigh Road Inspector, and the Secretary of State⁶: I am content given the short time period to which both parties evidence relates, that, notwithstanding Inspector Burden's comment within her Inspector's Report⁷, a 10% lapse rate for small sites would be reasonable and should be applied for the purposes of this appeal. As such, the 635 dwelling figure should be used.

Small site windfall allowance

37. The Council has taken a simple approach to setting out the small site windfall allowance. The plan period annual completion rate for small scale windfall sites has then been reduced by 17% to make allowance for windfall sites allowed on garden land. To ensure there is no double counting of sites that already benefit from planning permission the first three years are discounted from this figure.
38. This approach whilst different to that previously utilised by the Council appears logical, and as the average figure relates to completions rather than

⁵ APP/D0121/W/16/3153935

⁶ APP/D0121/W/16/3153935

⁷ North Somerset Council Sites and Policies Plan Part 2: Site Allocations Plan, Inspector's Report February 2018

permissions, is robust and not prone to double counting. As such, on the evidence before me the small site windfall allowance should be 274 dwellings.

Rural building conversions

39. I am aware that the provisions of the GPDO have recently changed to increase the number of dwellings that can be permitted without recourse to applying for planning permission. However, I am not convinced that an annual figure of 36 dpa will continue to be realistic over the next five years, nor that some of the dwellings which would be added to the supply from this source, would not, in the past, have been granted planning permission. Therefore, there is a strong possibility that they would previously have formed part of the small site windfall allowance. Consequently, I conclude, given the downward trajectory of sites coming forward that a lower rate would be more appropriate. The appellant's figure at 16 dwellings appears reasonable, albeit, perhaps cautious. Nonetheless, the impact of such a figure is marginal, and in the context of the wider picture, it would be a reasonable quantum of development to attribute to this source.

Empty Homes

40. The Council suggests that a contribution of 112 dwellings from the bringing back into use of empty homes and targeted interventions set out within its Empty Property Delivery Plan should be included within the supply. I have no doubt that this approach will make a contribution over the five year period. However, I, like my colleague in the Farleigh Road appeal, am not certain the evidence is sufficiently clear that this assumed supply would not be conflated with other sources of supply, and that the figure is not vulnerable to double counting. Consequently, I conclude that the allowance should be disregarded.

Deliverability of large sites

41. The Council and appellant have helpfully isolated the specific sites where there is disagreement as to whether they should be included in the five-year supply of deliverable housing sites. Footnote 11 to the Framework expands on what is meant to be deliverable as does the national Planning Practice Guidance. The so-called St Modwen Developments Limited judgements, confirmed that Paragraph 47 of the Framework requires that Councils have an obligation to provide a sufficient supply of land which is capable of being delivered to provide a five year housing supply. There is a clear distinction between what is capable of being delivered, and what will be delivered. Thus, for a site to be regarded as deliverable, it need not be necessarily certain or probable that housing will be delivered upon it, or that it would be delivered to the fullest extent possible within the five years. Rather, it should simply be capable of being delivered. As a consequence, there needs to be clear evidence to show not that there is simply doubt or improbability, but rather that there is no realistic prospect a site could come forward within the five year period for it to be discounted from the supply.

42. I have been referred to detailed national evidence relating to lead in times for development. Whilst this is useful as a general guide, I do not consider it to be determinative in considering the deliverability of specific sites in a given locality.

Large sites with consent

43. *Oxford Plasma and Bleadon Quarry*: I was asked to visit both these sites, where I was able to see that they both remain operational. However, there is nothing before me to suggest that I should come to a different conclusion than that drawn by Inspector Jones in the Fairleigh Road appeal, with which the Secretary of State did not disagree, that the sites should remain within the supply. In coming to this conclusion I note that this Inquiry took place over a year ago. Nonetheless, no additional site specific evidence was submitted to demonstrate that the schemes would not be implemented within the five year period, to enable me, to conclude, as stated by the appellant in cross examination, that both the Secretary of State and my colleague had made a mistake, in their interpretation of national policy, including the relevant elements of the PPG. As such, these sites should remain in the supply (51 and 42 dwellings respectively).
44. *Woodborough Farm*: This site has outline planning permission. It is a matter of dispute as to when the site is to be delivered, with the appellant suggesting a more conservative approach than that of the Council (125 vs 175 dwellings). Both the Council and the appellant argue that their particular trajectory has been agreed by the developer. This illustrates the futility of slavishly relying on such information, and that the speed of delivery of housing is, on the whole, in the gift of the developer, and is influenced by a number of variables. In the absence of clear evidence that the scheme will not be implemented, I favour the Council's figures (175 dwellings).

Saved Local Plan Allocations

45. These five, longstanding sites do not, as yet, benefit from planning permission, and have been brought forward from the previous local plan. By definition, they must be considered as developable. The Environment Agency has, in principle, no objection to the development of each of these sites, but is unable to confirm that they are capable of delivery. Given the flood risk issues related to them, sequential and exceptions tests are required and this is explicitly set out within the relevant part of Schedule 1 of the recently adopted SAP. This requirement will add time to the delivery of the sites, and an element of uncertainty that these sites will, in fact, come forward within five years or are capable of delivery. The Inspector at the Fairleigh Road Inquiry considered that legitimate concerns had been raised in relation to the delivery of the individual sites, yet considered these were not necessarily insurmountable. However, on the evidence before me, including the detailed site specific requirements to which I have been referred within the now adopted development plan, given the uncertainty, I favour the appellant's approach that there be a 0 dwelling contribution from this source. In coming to this conclusion, I am aware of the changes in circumstances for two of the sites. However, neither of these impacts on the flood risk related requirements for either of the sites, within the adopted SAP.
46. Clearly, in the future, and in the context of a different reporting period, circumstances will change, and these sites may become deliverable. This will become clear through active monitoring.

47. *Strategic Sites*: The appellant's evidence suggests that the forecast delivery rate put forward by the developers at the Weston villages (511 dpa) is of a substantially higher quantum per annum than normally achieved nationally⁸. It is further suggested that, as the Council's forecast rate is even higher (653 dpa), then this should be treated with caution. As such the development industry's trajectory should be given greater credibility in calculating the contribution to the five year supply of deliverable housing.
48. I have been referred to instances locally where the delivery of housing has outpaced that proposed by the developers, and where it has fallen below that considered likely by the Council. These instances illustrate the lack of certainty in forecasting the delivery rate of sites.
49. I am also aware that Inspector Burden suggested that there was a high level of uncertainty that the Weston Villages would deliver the level of housing anticipated in the SAP by 2026. Nonetheless, I have carefully considered the evidence before me in the context of the St Modwen judgements. I consider that there is not the clear evidence to suggest that the housing levels suggested by the Council are not capable of being delivered in the context of providing a supply of deliverable housing sites.
50. In coming to this conclusion, I am aware of the conclusions drawn by previous Inspectors to which I have been referred. However, I have made a distinction between the delivery of housing sites as set out within a developer's trajectory, which is influenced by a number of considerations, and the supply of housing sites which are capable of being delivered. As a consequence, I prefer the Council's figure of 3265 dwellings.
51. *Allocations in the SAP*: The Council was required to include further housing allocations to ensure that the SAP was found sound prior to its adoption. Of the allocated housing sites within the recently adopted SAP, the contribution to the five year housing land supply is in dispute in relation to sixteen sites.
52. These sites are allocated for development, and therefore, must be by definition developable. However, the adopted SAP requires that a sequential and exceptions test be undertaken for some of the allocated sites. Consequently, for the reasons set out above, I am unable to conclude that ten of the sites are necessarily capable of delivery within the next five years. This reduces the supply by 705 dwellings.
53. In relation to the other sites where there is dispute between the parties, on the balance of the evidence the Council's approach is to be favoured.

⁸ Neil Tiley Proof of Evidence Figures 9.2 and 9.3

Category of contribution	
1st October 2017 to 30th September 2022	
Large sites with consent	2430
Saved Local Plan allocations (brought forward to adopted SAP)	0
Strategic sites	3265
Other allocations in SAP	1945
Small sites with planning consent	635
Small sites windfall	274
Change of use from rural buildings	16
Empty homes brought brought back into use	0
Total	8,565

54. Therefore, on the evidence put to me at this Inquiry, I consider that the total five year supply of deliverable housing is 8,565 dwellings, or 4.4 years.

Other matters

55. I am aware of the local support for the proposal, including the desire for additional local housing, as well as the provision of convenient employment premises.

Planning balance and conclusion

56. I have found that the appeal proposal would conflict with policies CS19 and CS33 of the CS and with Policy SA7 of the SAP. I consider that the proposal is contrary to the development plan as a whole. I afford this conflict very significant weight.

57. However, I have also found that the Council is unable, in the context of the evidence before me, and for the purpose of this Inquiry, to demonstrate a five-year deliverable supply of housing. As a consequence, the so-called 'tilted balance' in paragraph 14 of the Framework, which is a significant material consideration, applies. This is clear that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as whole. I now turn to the suggested benefits.

58. There are clear benefits to the scheme, namely, a mixed development, including up to 115 homes, of which 30% would be affordable (to be secured by planning obligation). Representatives of the local construction industry, who spoke in favour of the scheme, were clear that it was achievable within the next five years and I am aware of the pressure for development in the area⁹. Given the lack of a five-year supply of deliverable housing sites in the area, I accord this benefit substantial weight.

⁹ My attention was drawn specifically to 18/P/2652/OUT as an example of this

59. There would also be the opportunity to improve surface water run-off and reduce the risk of flooding. However, it is not clear to what extent the problems experienced by ORP are related to the site, therefore I accord this benefit moderate weight. It has also been put to me that the scheme would provide investment to regenerate the remaining element of the WBP, and thereby provide jobs over and above those which would be temporarily provided during the construction. However, there is no evidence before me to suggest that such investment could not be sourced by other means so I accord this very little weight in favour of the application.
60. In addition, I have been referred to the benefits to local biodiversity from the proposed scheme to which I accord minimal weight.
61. I conclude, therefore, that the adverse impacts of granting planning permission, namely the harms arising from the scheme's conflict with the development plan, would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
62. In coming to this conclusion, I have had regard to the fact that I could issue a split decision if I concluded that the appeal proposals on sites A and C were acceptable and that permission should be granted, and that development on Site B was not, and permission should be withheld. However, the detailed evidence, including that relating to flood risk matters, which accompanied the outline application was predicated on all three sites being developed together. As a consequence, on the basis of the evidence before me, I do not consider that a split decision would be appropriate. For the reasons given above, and taking all other matters into consideration, I conclude that the appeal should be dismissed.

L. Nurser

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Timothy Leader, of Counsel	Instructed by Head of Development Management at North Somerset Council
He called	
Mr Michael J Muston BA (Hons), MPhil, MRTPI	Director, Muston Planning
Ms Natalie Richards	Principal Planning Policy Technical Officer, North Somerset Council

FOR THE APPELLANT:

Neil Cameron, of Queen's Counsel	Instructed by Rocke Associates
He called	
Neil Tiley Bsc (Hons), Assoc RTPI	Associate, Pegasus Group
Chris Enderby Dip LA, CMLI	Director, Enderby Associates Ltd
Thomas Rocke BA (Hons), Phd, BTP (Dist), MRPTI	Director, Rocke Associates.

INTERESTED PERSONS:

Cllr Ap Rees	Local Ward Councillor and North Somerset Council Executive Member for Strategic Planning
Cllr Mike Cooper	Chair of Locking Parish Council
Mr Barrie Smith	Local Resident
Mr Vizor	Local Resident
Mr Andrew Pearson	On behalf of Mrs Davy, Local Resident
Mr Philip Hill	Director of PJ Hill Building Contractors, Local Builder
Mr Paul Brace	Weston Builders Ltd, Local Builder
Mr Robert Payne	Local Resident
Mr Gordon Sillence	Local Resident
Mr Clifford Dumbell	Local Resident
Mr Stephen Griffin	Local Resident
Mr Simon Terry	Notaro Care Homes
Mrs Marion Petty	Local Resident
Mrs Stella Thompson	Chair of The Oaktree Park Residents Association (TOPRA)
Mr Robins	Local Resident
Mr Werret	Local Resident (letter read out by Mr Cameron on his behalf).
Cllr Terry Porter	Local Ward Councillor and Hutton Parish Councillor
Frank Richards	Local Resident

INQUIRY DOCUMENTS

- 1 Letter from F J Tucker
- 2 Letter from Phil Jones
- 3 Letter from Sabato Notaro
- 4 Table setting out 5 year housing land supply position following receipt of Farleigh Fields Appeal decision
- 5 Bundle of papers including map indicating boundary of appeal site, and Elm Grove Nursery application (18/P/2652/OUT) superimposed on strategic gap, together with details of the planning application.
- 6 List of examples of post Framework policies relating to Strategic Gaps or similar
- 7 Opening submissions made on behalf of the appellant.
- 8 Opening statement on behalf of North Somerset Council.
- 9 Statement produced by Mr Barrie Smith
- 10 Local Development Scheme 2018- 2021 North Somerset Council
- 11 Plan illustrating the position of the wooden pegs which had been set out on the appeal site delineating illustrative layout of development.
- 12 Plans of proposed western hangar at the Helicopter Museum.
- 13 Copy of Unilateral Undertaking under S106 of the Town and Country Planning Act 1990
- 14 Table of respective positions of land supply- with the Council's position on each disputed site.
- 15 Statement provided by Cllr Ap Rees, Ward Councillor and North Somerset Council Executive Member for Strategic Planning.
- 16 Statement provided by Stella Thompson, Chair of The Oaktree Park Residents' Association (TOPRA).
- 17 Email dated 26 February 2018, regarding the Inspector's Report into the Site Allocation Plan and implications thereof, sent on behalf of Inspector Bridgwater to appellant (APP/D0121/W/17/3186112).
- 18 Itinerary for Inspector's Site Visits
- 19 Statement by Mrs Marion Petty
- 20 Statement by Mr Werrett
- 21 Letter from Mr Raglan
- 22 Extract from Planning Practice Guidance relating to housing and economic land availability assessment.
- 23 Draft schedule of conditions.
- 24 Statement by Frank Richards
- 25 Plan of sites at Youngwood Lane, Nailsea.
- 26 Sites within DM process as of 26 June 2017 produced as evidence to EIP
- 27 Statement by Cllr Terry Porter, Ward and Parish Councillor.
- 28 Closing submissions made on behalf of North Somerset Council.
- 29 Closing submissions made on behalf of the appellant.

PHOTOGRAPHS

- 1 Missing photograph which forms part of Mr Muston's evidence: Photo 5.
- 2 Various photographs of the site, and environs provided by Mr Robins.

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix V

---Original Message-----

From: Neil Underhay <Neil.Underhay@n-somerset.gov.uk>

To: grahamgmaoffice <grahamgmaoffice@aol.co.uk>

Sent: Wed, 7 Mar 2018 10:41

Subject: Planning Application 17/P/5572/OUT - 8 chalet bungalows off Bartlett's Way / Leafy Way

Morning Mike,

You will be aware that the Planning Inspector's final report for the 'Site Allocations Plan' was received last month and officers have considered, amongst other issues, how this affects planning applications for housing outside settlement boundaries. The key summary from the Inspector's report, so far as the above application is concerned is:

- The Council has demonstrated sufficient housing sites to deliver the Core Strategy housing requirement, taking account of the need to provide flexibility and choice.
- The Inspector is silent on the matter of whether or not a 5-year housing land supply can be demonstrated but this is not a matter for the 'Site Allocations Plan' to resolve.
- The Site Allocations Plan: *"provides a sufficient balance between immediately available sites and longer term opportunities for residential development and makes a positive contribution to the achievement of a five year housing supply"*.
- Subject to modifications to some policies the Site Allocations Plan is found to be sound.

With the inclusion of modifications to the policies identified by the Inspector, the Site Allocations Plan will be recommended for adoption at Full Council on 10th April. This will mean that the development plan for North Somerset to 2026 will then be fully up-to-date and adopted (including the Core Strategy, Development Management Policies and Site Allocations Plan). Given the comments from the Inspector, the weight that can now be attached to the development plan is, even before the SAP is adopted, much more substantial than applied when the previous application was determined in November 2017. Consequently, it is the officers' view that Policy CS33 from the Core Strategy, which does not support housing outside 'infill' villages such as Locking, would now outweigh other material considerations. I will therefore be recommending that the principle of the application is refused.

In terms of a five-year supply of deliverable housing land, the Council's considers it can currently demonstrate this, but this will be tested at a planning appeal for housing at Laney's Drove, Locking, which takes place next month. The outcome of that appeal (which is likely to be known in June / July) may be a material consideration for future decisions, but until then it is the officers' view that decisions on housing applications should accord with the current status of the development plan.

For other matters, I have just received the comments from the Council's Highway Officer and these are attached. You will note there is a holding objection to the proposed new access drive from Bartlett's Way because the footpath alongside it is not wide enough (it needs to be 2 metres wide rather than 1 metre wide as currently shown), but there is enough land to resolve this with a revised plan. The use of the A371 for construction purposes is not supported. Construction traffic would therefore have to access the site via Leafy Way and this would need to be carefully controlled to minimise its impacts.

I will relay these views on the application to the Ward Councillors, to establish whether or not they wish to refer the application to Committee and confirm the timescale and procedure for a decision shortly.

Should you have any questions, please call me.

Kind regards

Neil

Neil Underhay
Principal Planning Officer
Development & Environment
North Somerset Council

Tel: 01275 888811

Web: www.n-somerset.gov.uk

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Appendix VI



Appeal Decision

Site visit made on 5 September 2018

by Rory Cridland LLB (Hons), Solicitor

an Inspector appointed by the Secretary of State

Decision date: 1 October 2018

Appeal Ref: APP/D0121/W/18/3199616

Land to the North of Leafy Way and Bartletts Way, Locking, Western-super-Mare BS24 8BD.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Mr Bartlett against the decision of North Somerset Council.
 - The application Ref 17/P/5572/OUT, dated 19 December 2017, was refused by notice dated 14 March 2018.
 - The development proposed is erection of 8 new chalet bungalows with all matters reserved for subsequent approval.
-

Decision

1. The appeal is allowed and outline planning permission is granted for 8 new chalet bungalows at Land to the North of Leafy Way and Bartletts Way, Locking, Western-super-Mare BS24 8BD in accordance with the terms of the application, Ref 17/P/5572/OUT, dated 19 December 2017 subject to the conditions set out in the attached Schedule.

Preliminary Matter

2. Notwithstanding the description of development set out above, the written evidence indicates that matters of access were consulted upon and considered by the Council as part of its determination. Accordingly, I have determined the application on a similar basis, treating all plans as illustrative except where they deal with matters of access.

Application for costs

3. An application for costs was made by Mr Bartlett against North Somerset Council. This application is the subject of a separate Decision.

Main Issue

4. The main issue is whether the site offers an acceptable location for the proposed development having regard to its location outside a recognised settlement boundary.

Reasons

5. The appeal site is located outside the settlement boundary for Locking, an infill village situated close to Western-super-Mare. The site itself consists of a rectangular paddock with stables measuring around 0.5 hectares which is currently accessed from the nearby A371. It is, however, separated and well screened from this main road by an area of deciduous woodland.

6. The proposal would involve the erection of 8 chalet style bungalows to the rear of Leafy Way and Bartletts Way, an established residential area located close to Locking Primary School. The Council has acknowledged that in repositioning the access to nearby Bartlett's Way, the present application addresses its previous concerns in relation to highway safety¹. However, they have objected to the proposal on the basis that it is outside the settlement boundary for Locking and, as such would be in conflict with Policies CS14 & CS33 of the North Somerset Core Strategy² (CS).
7. The development plan sets out a clear settlement strategy for the area. Policy CS14 of the CS directs new development towards the area's main towns and villages in accordance with the established hierarchy. Although it recognises that there will be opportunities for small scale development within and abutting the settlement boundaries of Service Villages, it strictly controls development elsewhere including those areas identified as 'infill villages' such as Locking. Likewise, it makes clear that development outside the settlement boundaries will only be acceptable on sites allocated within a Local Plan or where it accords with the criteria set out in the relevant settlement policies.
8. One such policy is Policy CS33 which allows for some limited development within the settlement boundaries of the infill villages. However, it restricts development elsewhere other than in a limited number of defined circumstances including where it involves replacement dwellings, residential sub-divisions, the residential conversion of buildings where alternative economic use is inappropriate, dwellings which are essential for rural workers or affordable housing situated adjacent to settlements. None of these circumstances apply in the present case. As such, in view of its location outside the settlement boundary, I agree with the Council that there is a clear conflict with Policies CS14 & CS33 of the CS.
9. However, my attention has been drawn to a recent appeal decision at Laney Drove³ ("the Laney Drove Decision") where the Inspector, having heard detailed evidence on the matter, concluded that the Council was only able to demonstrate a 4.4 year supply of deliverable housing sites. This identified shortfall has been acknowledged by the Council as part of this appeal. While I acknowledge that the recently adopted Site Allocations Plan (SAP) may be sufficiently flexible to allow any shortfall to be addressed by bringing forward the delivery of sites already identified in the SAP and CS, Paragraph 11⁴ of the National Planning Policy Framework ("the Framework") makes clear that in such circumstances, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
10. As a general rule, I do not believe that the settlement strategy set out in an adopted plan should be set aside lightly. However, while I acknowledge that being out of date does not make policies immaterial in decision making, the weight that is afforded to them is often diminished.

¹ which formed its sole reason for refusal for a different, albeit substantially similar, application in November 2017 (Ref: 17/P/1179/O).

² (2017).

³ APP/D0121/W/17/3184845.

⁴ 11(d)(ii).

Accordingly, I afford the conflict with the development plan identified above a moderate amount of weight.

11. While I note the approach taken by the Inspector in the Laney Drove Decision where she afforded 'very considerable weight' to that proposal's conflict with the development plan, that was, in part, due to the additional harm that would arise from the proposal's impact on the strategic gap. Indeed, the Inspector in that case noted that the strategic gap, and that particular site within it, played a significant role in ensuring that the environmental impact of unplanned growth does not cause significant adverse harm. The impact on the strategic gap does not form one of the reasons for refusing planning permission for the current proposal and the Council's written evidence indicates that there is no objection in this respect. As such, I am not persuaded that the circumstances are sufficiently similar to indicate that I should adopt a similar approach to that taken in the Laney Drove appeal.
12. Turning then to the proposals' benefits, the appeal site is located on the southern side of the A371 where the majority of built development within Locking is located. It would help boost the supply of housing, a key aim of national planning policy, and provide easy access to local services and facilities. In view of the shortfall in housing land supply, I afford this a considerable amount of weight.
13. In addition, it would provide some modest benefits to the local economy (both during and after construction) as well as providing some additional support for local services. Individually, these benefits are small, however, cumulatively they provide some additional support in favour of the proposal and I afford them a moderate amount of weight. Likewise, while I note the enhancements to highway safety proposed are limited in both scope and extent, they nevertheless provide some additional support in favour of the proposal.
14. Accordingly, in view of the lack of any other material harm identified, I consider the adverse impacts that would result from a departure from the settlement strategy would not, in this instance, significantly and demonstrably outweigh benefits when assessed against the policies in the Framework as a whole. This leads me to conclude that, notwithstanding its conflict with Policies CS33 & CS14 of the CS, there are material considerations which indicate that a departure from the development plan would be justified.

Other Matters

15. In reaching my decision I have had regard to the concerns raised by local residents and Locking Parish Council, both those made as part of the original application and during the course of this appeal. However, there is no robust evidence which would indicate that it would have a negative impact on parking or highway safety along Leafy Way or more widely. Likewise, there is no robust evidence which would indicate that it would result in an overdevelopment of the site or that emergency vehicles would be unable to access the road.
16. Furthermore, there is nothing to indicate that local drainage infrastructure is currently at or nearing full capacity or that suitable drainage cannot be

achieved. While I acknowledge that the development might result in some disturbance and disruption during construction, these circumstances are temporary and do not provide sufficient grounds for withholding permission.

Planning Conditions

17. I have had regard to the various planning conditions that have been suggested by the Council. In addition to the standard conditions regarding the submission and approval of reserved matters and the commencement of development, I consider a condition requiring the access to be constructed prior to the occupation of any dwelling is necessary in order to ensure that on-site facilities are available for future occupiers.
18. Furthermore, a method of construction statement is necessary in the interests of highway safety while conditions in respect of drainage are appropriate to ensure the site is suitably drained. However, in view of the drainage report already submitted, I am not persuaded that such a detailed pre-commencement condition is necessary and as such have amended it accordingly. In addition, I consider a condition in respect of energy efficiency is necessary to help meet the aims of Policies CS1 & CS2 of the CS.
19. However, conditions requiring further details on finished floor levels, those which relate to landscaping, materials, boundary enclosures, and waste and recycling are not necessary as these matters can be sufficiently dealt with as part of the reserved matters.
20. The Council has also suggested a condition requiring all persons with an interest in the land to enter into a planning obligation in respect of affordable housing in the event that the combined floor area exceeds 1000m². However, the planning practice guidance indicates that such conditions will not be appropriate in the majority of cases and without a detailed explanation for imposing it in the present case, I cannot be certain that there are the exceptional circumstances present which would justify it.

Conclusion

21. I have found above that the proposal would be in conflict with Policies CS33 & CS14 of the CS which set out the settlement strategy for the area. However, in view of the lack of any material harm, I have also found that there are material considerations present which indicate that a departure from the development plan is justified.
22. Accordingly, for the reasons set out above and having had regard to all other matters raised, I conclude that the appeal should be allowed.

Rory Cridland

INSPECTOR

SCHEDULE

Conditions:

- 1) Details of the appearance, landscaping, layout, and scale (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 4) No other part of the development hereby approved shall be commenced until:
 - a) the dwelling at No 5 Bartletts Way has been demolished and the access road (including any temporary construction access road) has been laid out, kerbed, drained and constructed up to base course level for the first 30 metres back from its junction with Bartlett's Way in accordance with the approved details;
 - b) the existing access from the A431 has been stopped up; and
 - c) a Method of Construction Statement, to include details of:
 - (i) parking for vehicles of site personnel, operatives and visitors;
 - (ii) loading and unloading of plant and materials;
 - (iii) storage of plant and materials;
 - (iv) programme of works (including measures for traffic management);
 - (v) provision of boundary hoarding behind any visibility zones;
 - (vi) full details of any temporary site access for construction purposes;
 - (vii) hours of construction and of deliveries to and from the site;
 - (viii) location of any construction compound/site offices;
 - (ix) details and the location of any generators to be used on site;has been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented throughout the construction period.
- 5) The occupation of any dwelling shall not take place until:
 - a) the footways and footpaths which provide that dwelling with direct pedestrian routes to an existing highway maintainable at public expense have been constructed up to and including base course level;
 - b) the visibility splays have been laid out to their final level;
 - c) the car parking and any other vehicular access facility required for the dwelling by this permission has been completed.

- 6) When constructed and provided in accordance with condition 5 above, the approved parking areas, footways, footpaths and visibility splays shall be thereafter permanently retained.
- 7) No part of the development hereby permitted shall be commenced above Damp Proof Course Level until the detailed design of the proposed permanent surface water drainage management system, including details of the exceedance pathways and overland flow routes across the site for the proposed surface water drainage management system, have been submitted to, and approved in writing by, the Local Planning Authority.
- 8) No dwelling shall be occupied until measures to generate 15% of the ongoing energy requirements for that dwelling through the use of micro renewable or low carbon technologies have been installed and are fully operational in accordance with the approved details that shall have been first submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved technologies shall be permanently retained.

END OF SCHEDULE

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Land off Bleadon Road, North Somerset

Appendix VII

SECTION 1 – ITEM 8

Application No:	18/P/3625/OUT	Target date:	02.10.18
Case officer:	Andrew Stevenson	Extended date:	
Parish/Ward:	Winscombe And Sandford Banwell And Winscombe	Ward Councillors:	Councillor Ann Harley Councillor Jerry O'Brien
Applicant:	Progress Land (Sandford) Ltd and Aurora Land and Design		
Proposal:	Outline planning application for a residential development of up to 85 dwellings and associated infrastructure, with all matters reserved for subsequent approval except for access		
Site address:	Land North of Greenhill Road, Sandford Winscombe		

APPLICATION REFERRED BY CLLR HARLEY

Summary of recommendation

It is recommended that, subject to the completion of a legal agreement, the application be **APPROVED** subject to a S106 agreement and conditions. The full recommendation is set out at the end of this report.

Background

This application has been submitted as a duplicate to application 17/P/0887/O which is subject to an appeal against non-determination. The appeal will be heard at a public inquiry and is the subject of a separate report elsewhere on this agenda.

This application has been submitted to allow the Council to make a decision on the proposal as it sees fit. It has been submitted with the same documents as the original application ref 17/P/0887/O which had originally sought consent for up to 93 dwellings. In the courses of assessment an amended masterplan was submitted reducing the quantum of development to up to 85 dwellings and the appeal was been submitted on that basis. The applicant has confirmed that they are seeking approval for up to 85 dwellings via application 18/P/3625/OUT which is consistent with the amended masterplan submitted under 17/P/0887/O, and the description of development has been updated to reflect this.

The Site

The site measures around 2.3 ha and comprises three fields of pasture extending along the rear of existing properties from behind Sandford Primary school to the junction of Greenhill Road with Greenhill Lane. The site is outside the settlement boundary for Sandford and adjoins existing residential development to the south and the school to the south west. A development of 118 dwellings is currently under construction on land to the

west. Beyond the northern boundary the land opens out to farmland. Hedgerows mark the boundaries to the north and west, with the southern boundaries comprising a mix of walls, hedges and fencing.

The Application

Outline planning permission is sought for residential development of up to 85 dwellings including 30% affordable housing (26 units) along with associated infrastructure. All matters are reserved with the exception of vehicle access which is proposed from Greenhill Road. The application has been amended from that originally submitted to reduce the number of units from 93 to 85.

Relevant Planning History

Reference	Proposal	Decision
17/P/0887/O	Outline planning application for a residential development of up to 85 dwellings and associated infrastructure, with all matters reserved for subsequent approval except for access	Appeal lodged against non-determination (see elsewhere on agenda)
0813/86	Residential development.	Refuse

Policy Framework

The site is affected by the following constraints:

- Outside the settlement boundary for Sandford

The Development Plan

North Somerset Core Strategy (NSCS) (adopted January 2017)

Policy Ref	Policy heading
CS1	Addressing climate change and carbon reduction
CS2	Delivering sustainable design and construction
CS3	Environmental impacts and flood risk management
CS4	Nature Conservation
CS5	Landscape and the historic environment
CS9	Green infrastructure
CS10	Transport and movement
CS11	Parking
CS12	Achieving high quality design and place making
CS13	Scale of new housing
CS14	Distribution of new housing
CS15	Mixed and balanced communities
CS16	Affordable housing
CS33	Smaller settlements and countryside

CS34 Infrastructure delivery and Development Contributions

The Sites and Policies Plan Part 1: Development Management Policies (adopted July 2016)

The following policies are particularly relevant to this proposal:

Policy	Policy heading
DM1	Flooding and drainage
DM4	Listed Buildings
DM6	Archaeology
DM8	Nature Conservation
DM9	Trees
DM10	Landscape
DM11	Mendip Hills Area of Outstanding Natural Beauty
DM19	Green infrastructure
DM24	Safety, traffic and provision of infrastructure etc associated with development
DM25	Public rights of way, pedestrian and cycle access
DM28	Parking standards
DM32	High quality design and place making
DM70	Development infrastructure

Other material policy guidance

National Planning Policy Framework (NPPF) (July 2018)

The following is particularly relevant to this proposal:

Section No	Section heading
5	Delivering sufficient supply of homes
6	Building a strong, competitive economy
8	Promoting healthy and safe communities
9	Promoting sustainable transport
11	Making effective use of land
12	Achieving well-designed places
14	Meeting the challenge of climate change, flooding and coastal change
15	Conserving and enhancing the natural environment
16	Conserving and enhancing the historic environment

Supplementary Planning Documents (SPD)

- Residential Design Guide (RDG1) Section 1: Protecting living conditions of neighbours SPD (adopted January 2013)
- Residential Design Guide (RDG2) Section 2: Appearance and character of house extensions and alterations SPD (adopted April 2014)
- North Somerset Parking Standards SPD (adopted November 2013)
- North Somerset Landscape Character Assessment SPD (adopted December 2005)
- Biodiversity and Trees SPD (adopted December 2005)

- Travel Plans SPD (adopted November 2010)
- Affordable Housing SPD (adopted November 2013)
- Development Contributions SPD (adopted January 2016)

Consultations

The deadline for consultations has not expired at the time of writing and the committee will be updated with any further representations received. Given this is a duplicate of the previous application 17/p/0887/O it is anticipated that no new material issues will arise.

Copies of representations received can be viewed on the council's website. This report contains summaries only.

Highways England

No objection

Wessex Water

No objection

Avon Fire & Rescue Service

No objection

Winscombe and Sandford Parish Council

Comments awaited

Officer comment:

The following comments were received in respect of the previous application 17/P/0887/O.

Recommend refusal for the following reasons

Infill only village: Sandford is designated as an 'infill only village' by NSC and this application abutting, but outside the settlement boundary for the village will do nothing to preserve the rural character of the area. Sandford village is not able to support further development of this scale, especially as 118 homes have already been granted planning approval at appeal on the adjacent site (15/P/0583/O Strongvox). By definition, due to the lack of facilities and services, infill villages are not able to sustain growth at this rate and it is apparent that Sandford is the only infill village in North Somerset to be targeted with this level of extreme development. Since the Strongvox planning application in 2015, no new facilities have been added, or are likely to be added in the foreseeable future, and therefore this application is considered to be totally un-sustainable.

Highway access: It is noted that plans include the demolition of a dwelling and construction of an apartment block in its place to allow a single access road into the development but the location of the site entrance is considered to be highly unsuitable due to the splay of the road and the poor visibility when looking back towards the village centre. There is no footway opposite the site entrance, only the wall of a Grade II listed building and members would ask if English Heritage have been consulted about the position of the site entrance? It was considered that for safety reasons the road access would need to be substantially set back from the proposed location, with ideally the highway to be re-routed to allow a new continuous footway to be installed on the opposite side of the road.

Public Transport: Whilst it has been advised by NSC that there are no planned changes to bus services through Sandford at this time, it is understood that First Group will be reviewing all their routes in September 2017 and there is great concern about the viability of the A2 subsidised bus service to Bristol Airport (then linking with other routes into Bristol) following the introduction of the Weston Flyer Service. Lack of public transport will add to increased traffic generated by the development.

Inadequate highway infrastructure: Due to the lack of employment opportunities in the village, the volume of traffic generated by the development through out-commuting would lead to an increased bottleneck in Banwell and queuing traffic at the Churchill traffic lights at peak times. Additional traffic from this and the Strongvox approved application in the parish will lead to unacceptable traffic pollution and health implications are of concern for our local community, especially primary school children with the school located on the main A368.

Impact from the AONB: and on listed buildings. It was recommended in the pre-planning advice given that a Landscape Visual Impact Assessment (including views from the AONB) should accompany any planning application. At this time, we have been unable to locate this assessment. The development will be visible and detrimental to views from the close by Mendip Hills AONB, especially from Sandford Hill and night lighting will not respect the 'dark skies' of the AONB.

There is a Grade II listed residence immediately opposite the proposed site entrance and it is claimed by the developer that the three storey apartments/flats have been included to respect and reflect this. The Council disputes this as the mentioned property is in fact a thatched cottage and three storey buildings are not in keeping with Sandford Village.

Whilst strongly opposed to the planning application and development, the Parish Council does however recognise that some planning applications may be viewed differently by North Somerset Council and/or the Planning Inspectorate at a Planning Appeal. Should this be the case and the application were to be approved, the Parish Council would request that to assist a rapidly expanding community, that an area of land is set aside within the final plan for the proposed development of a new village hall, along with parking facilities. The Parish Council would further fully endorse the Section 106 application from the Sandford Neighbourhood Group for additional facilities and services for the village to mitigate the detrimental effects of this development.

Third Parties: The Committee will be updated at the meeting. Two objections have been received at the time of writing. The principal planning points made are as follows:

- Contrary to planning policy
- Overdevelopment and out of keeping with the character of the village
- Impact on local ecology
- Lack of public transport links
- Additional traffic and congestion to local road network
- Increased pressure on existing services and facilities
- Harmful impact to neighbouring residents.

Officer comment:

28 objections were received in relation to application 17/P/0887/O. The principal planning points made are as follows:

- *Overdevelopment and harmful to the rural character*
- *Sandford is an infill village with few facilities*
- *Public transport provision is insufficient*
- *Local school and village hall too small to accommodate growth*
- *No room for Sandford primary school to extend and no class spaces*
- *Lack of local job opportunities*
- *Increased traffic and congestion*
- *Additional pollution from vehicle movements*
- *Harm to nearby Mendip Hills AONB*
- *Disruption to wildlife and protected species*
- *Loss of agricultural land*
- *Parts of the site and surrounding areas at risk of surface water flooding*
- *Brownfield land should be used for development*
- *The application was not put forward as part of a neighbourhood plan*
- *The Strongvox appeal does not set a precedent*
- *Overall adverse effects of development outweigh the benefits of providing housing.*

Principal Planning Issues

The principal planning issues in this case are (1) the principle of development and sustainability issues, (2) landscape and character impact (3) transport and access, (4) ecology, (5) flood risk and drainage (6) living conditions, (7) Impact to nearby listed buildings and 8) Development contributions.

Issue 1: The principle of development in this location and sustainability issues

Section 38 (6) of the Planning and Compulsory Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for the site comprises the policies within the Core Strategy (adopted January 2017), the Sites and Policies Plan Part 1 Development Management Policies (July 2016), and the Sites and Policies Plan Part 2 Sites Allocations Plan (April 2018).

The development plan sets out the settlement hierarchy and spatial strategy for the district. Policy CS33 seeks to strictly control new development in rural areas outside the main towns and service villages in order to protect their character and prevent unsustainable development. The Core Strategy identifies Sandford as an infill village where the restrictions inherent in Policy CS33 apply. The application site is on greenfield land outside the Sandford settlement boundary where a proposed development of up to 85 dwellings is in clear conflict with Policy CS33 and the locational strategy of the Core Strategy.

Against this, paragraph 73 of the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements plus an additional buffer of 5% moved forward from later in the plan period to ensure choice and competition in the market for land and to boost significantly the supply of housing. Where there has been a previous under delivery of housing, local planning authorities should increase the buffer to 20%.

It was the Council's position that at October 2017 a five-year supply of deliverable sites for housing could be demonstrated. This position was tested at the recent public inquiry in respect of proposed housing development at Laney's Drove, Locking. The Inspector did not agree and concluded the evidence presented at the inquiry did not support the Council's ability to demonstrate a 5-year supply of housing. She concluded that the Council could only demonstrate a 4.4 year supply using a 20% buffer.

Accordingly, paragraph 11(d) of the NPPF is engaged and relevant policies for the supply of housing should not be considered "up to date". This means there is a presumption in favour of granting planning permission unless any adverse impacts of doing so would "significantly and demonstrably" outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

As a result, in the absence of a 5-year housing supply, Policy CS33 is not considered up to date. Despite this, Policy CS33 can still be accorded weight in the planning process. The degree of weight which can be given depends on the extent to which the policy is consistent with the NPPF. In this regard as the Core Strategy has recently been adopted and the policies are consistent with the NPPF, Policy CS33 can still be given significant weight.

The principle of development must therefore be assessed in context of the conflict with Policy CS33, yet in the absence of a five-year supply of housing land this policy cannot be given full weight. As a consequence, the tilted balance of paragraph 11 of the NPPF applies, which dictates that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and this is a significant material consideration.

Sustainability issues

National policy supports a sustainable approach to development in rural areas with the emphasis being on supporting services, employment and facilities in larger villages. In the planning system substantial benefit is attached to the delivery of housing, however this does not override all other considerations. As set out in the NPPF, there is a presumption in favour of sustainable development unless the adverse impacts of the proposal significantly and demonstrably outweigh the benefits.

The Government's view of sustainable development is set out in the NPPF. Sustainable development has many strands, but its core dimensions fall into three broad categories – economic, social and environmental. In the recent appeal by Strongvox (October 2016 and prior to the adoption of the Sites Allocation Plan) for up to 118 dwellings on land immediately to the west of this site, the Inspector assessed the suitability of Sandford as a location for housing development against these three strands and in the context of the Council not being able to demonstrate a five-year housing land supply. This took account of the level of services and facilities, accessibility, travel to work and employment base, and social and community facilities, and in the absence of a five-year supply of housing land, the Inspector also considered the provision of services and facilities in neighbouring villages, including Winscombe and Churchill. This approach which remains consistent with paragraph 78 of the new NPPF.

In the period since October 2016 it is noted that in terms of provision of services and facilities, public transport links and employment base, that the circumstances of the village

will have evolved. It is noted that the Methodist Church has closed and is for sale potentially reducing opportunities for social and community activities, and the A2 bus service has been withdrawn, reducing access to public transport. Conversely, the Thatcher's cider plant has continued to expand, as well as The Railway public house, contributing to an increase in local employment opportunities. Nevertheless, none of these factors will be definitive in themselves, as they provide a snapshot of the current situation. Taking into account the Inspector's assessment on the Strongvox site it is practical to conclude that the site demonstrates a reasonable degree of sustainability. A good range of services and facilities remain in Sandford and nearby villages, the 126 bus service still provides an adequate service for a rural area to higher order settlements, and taken in the round travel to work patterns and the wider employment base will remain broadly consistent.

Through a S106 agreement the application proposes the transfer of a parcel of land at the western end of the site adjacent to the Primary school to be used as a playing field. Currently the primary school is constrained by the size of its site and whilst expansion of classrooms can take place within the existing school site, the availability of a playing field would off-set a potential loss of outdoor play space within the school site as a result of its future expansion. Subject to the detail of the transfer to be agreed through the S106 the playing field land can be made available for wider use outside school hours, with separate gated access. Given that the provision of additional capacity in the school is an aspiration of the Council and the local community the transfer of the land for these purposes is considered to be a very positive aspect of the proposal carrying significant weight in favour of the application.

The Core Strategy identifies Sandford as an infill village. Policy CS33 allows for infill and small-scale development within the settlement boundary only, thus much larger scale housing development outside the settlement boundary is strictly controlled in order to protect the character of the settlement against unplanned growth and prevent unsustainable development. Whilst there is conflict with this policy, in accordance with paragraph 11 of the NPPF, policy CS33 does not currently carry full weight. Therefore, it is for the local planning authority to demonstrate any significant and demonstrable harm that would outweigh the substantial weight given to the provision of new housing. It is a material consideration of significant weight that the adverse impact of large scale housing development in this general location outside the Sandford settlement boundary was tested out with the Strongvox appeal, and the Inspector found in granting planning permission that the adverse impacts would not significantly and demonstrably outweigh the benefits.

Issue 2: Landscape and character impact

Policies CS5 and CS12 of the Core Strategy seek to protect the character, distinctiveness and quality of the landscape, and proposals are expected to demonstrate sensitivity to the existing local character. Views into and out of larger sites must also be carefully considered in terms of landscape setting.

The site is not within any statutory landscape designations but is approximately 200m north of the Mendip Hills Area of Outstanding Natural Beauty (AONB). The North Somerset Landscape Character Assessment identifies the land as part of the landscape character area J2 River Yeo Rolling Valley Farmland landscape which is of moderate overall character, and in good condition.

The application proposes to develop a sizeable parcel of land to the north of the existing settlement edge, filling an area between the existing residential properties along Greenhill Road to Greenhill Lane. Over time the village has developed along a linear pattern with older and historic buildings located along Greenhill Road and Hill Road. Later infill development has continued this pattern. More recently, the Strongvox development on land immediately to the west has introduced a northern expansion to the village edge. Development of the application site would consolidate this expansion and infill the area between the Strongvox site to the west and Greenhill Lane and Sandmead Road to the north and east.

It is considered that in the context of wider views and key vistas any significant adverse landscape effects are mainly confined to the site itself. The site is potentially visible from the northern edges of the AONB, however it would not be prominent and would be viewed in the context of existing development. The paths through the AONB are densely wooded, so do not provide significant views to the site. Due to the topography and the existing built form, visibility of the site from in and around the village is restricted to properties immediately adjacent to it, from Sandmead Road and glimpses from Greenhill Road. In the immediate surroundings the character of the site would become more urban in nature appearing as a northern extension of the village and as such the rural ambience would change. The illustrative masterplan demonstrates how the impact of this could be mitigated to some degree by the retention of landscape buffers along the northern edge of the development site.

For these reasons it is considered the extent of the landscape harm would be limited. This assessment was shared by the Inspector for the Strongvox development, which although is a separate and larger parcel of land, in the wider context shares many of same characteristics of this application site. In the absence of any specified and demonstrable harm on landscape grounds, policies with a central purpose to protect landscape in its own right will not outweigh the overriding need for housing development to significantly boost the housing supply.

In terms of character the existing village extends in a linear form from the main road through Sandford. The existing properties have a varying set back distance from the road but form a strong, distinctive grain. These dwellings are frequently set within good sized plots. Development beyond Greenhill Road also follows a strong road frontage which creates a distinctive character to the village.

The updated illustrative masterplan has introduced a number of changes following consultation responses. These show the apartment blocks at the entrance to the site replaced with detached dwellings in order reflect the existing street scene; the main access road through the site has been realigned to make it more sinuous; aspects of the layout have been amended to provide further offset from existing trees and hedgerows; the open space on the western edge of the development will form part of a playing field; the pumping station has been moved towards the centre of the site; an attenuation pond has been added in the north-west corner; and a 5m wide maintenance strip has been added adjacent to the watercourse on the western edge of the site. A result of the amendments is that the quantum of development has been reduced from 93 to 85.

The illustrative layout demonstrates how a scheme of 85 units could be presented, however this must be caveated with the fact that design and appearance, layout and landscaping are reserved matters. The proposed design principles to include a clear road

hierarchy, the landscape strategy which supports a good amount of green space and the provision of land for a playing field are considered to be positive elements. The impact of new dwellings to the rear of existing properties situated along Greenhill Road can be assessed as part of a subsequent reserved matters application, however on the basis of the layout provided with the illustrative layout it is considered there is scope for any new development to accord with the adopted residential design guide SPD.

It is therefore considered that whilst there is some conflict with policy CS5 where this seeks to protect the rural landscape, the extent of this conflict is not such that it would constitute a significant and demonstrable harm and this is to be weighed in the planning balance.

Issue 3: Transport and access

Policy DM24 of the Sites and Policies Plan Part 1 seeks to ensure that new development will not prejudice highway safety of the operation of the highways network and that the impact of any new developments are adequately mitigated.

The site forms a parcel of land between the A368 Greenhill Road and Greenhill Lane, to the south it is bordered to by residential dwellings and to the west development has commenced for 118 dwellings on the Strongvox site. This site is close to Sandford primary school and within walking distance of a local convenience store. The A368 Greenhill Road is an 'A' Class highway which provides a link between Weston-super-Mare and the A38. It joins the A38 in the east at Churchill signalised cross roads which then provides access to Bristol. The access to Weston-super-Mare is via Banwell and the junction with the A371. Traffic surveys completed by the applicant indicate that in the morning peak an average two-way flow of 676 vehicles pass the site while during the evening peak the two-way flow is 631 vehicles.

The proposed development is for up to 85 properties, and access forms part of the outline application, with all matters reserved for subsequent approval. Parking is currently a reserved matter and has therefore not been considered in detail at this stage, however it would be expected that any subsequent development must adhere to the parking standards set out in the North Somerset Parking Standards SPD, which establishes the minimum required number of car parking spaces for residential development.

The applicant proposes to access the site via a new priority junction from the A368 Greenhill Road. Following discussions between the developer and highways officers and submission of revised access plans, swept path tracking plans and a stage one road safety audit, the design of the site access has been accepted. The site is served by one major internal distributor road with a single access onto the A368. As the internal layout is a reserved matter this will be considered at a later date.

A Transport Assessment has been submitted with this application. For the development scheme the TRICS rate has been used to predict the number of new trips the development is likely to generate. This is a widely recognised tool used in the industry for predicting the trip generation rate for new developments and the use is accepted here. Having reviewed the submission details Highways accept the estimates which been broken down to reflect a differing housing mix. The trip rate assessment indicates that in the AM peak the development will generate 43 trips, and in in the PM peak the development will generate 47 trips.

In assessing the cumulative impact of development on traffic congestion an assessment is made of any locations on the local network where the impact of the proposal additional traffic may be severe. This has regard to other planned development locally, including the Strongvox development on the adjacent site.

The applicant has tested the impact of the development at the Churchill A38/A368 junction using LINSIG, the industry recognised tool to assess the operation of the signalised junction. The assessment indicates that there is adequate capacity in the junction to cater for development traffic. From this it is concluded that for the periods tested with development scenarios that there is adequate capacity in the junction to cater for the additional development traffic.

The centre of Banwell is a highly constrained part of the highway network where the staggered junction of the A368 and A371, and the pinch points caused by narrow sections of the road constrain traffic flows and movement. The area on West Street and Castle Hill often relies on opposing drivers showing consideration for others. The area can feel dominated by cars especially at peak hour times or when buses or other large vehicles are trying to get through. There have been a number of minor accidents and damage to buildings recently. The turning count data in the AM peak from the development predicts some 49.7% of traffic turning right onto the A368 towards Banwell although not all journeys reach Banwell. The data indicated only 7 vehicles reaching Banwell which would be minimal. The modelling for the junction is based on that submitted for the Strongvox development (15/P/0583/0). The result and traffic analysis indicate that the traffic associated with the proposed development and that emanating from the Strongvox site will have little effect on the operation of the junction as it is already operating well over peak capacity.

It is recognised that, in Banwell, existing peak hour traffic volumes create difficulties in the operation of the local highways network. Nevertheless, the volume of traffic likely to travel through Banwell to and from the proposed development is relatively low, especially so when set against the scale of typical daily variation in peak hour flows, thus it is considered that the impact of the proposal on the highways network is unlikely to be severe.

It is considered that a suitable means of access can be provided onto Greenhill Road, and within the village, where facilities are present, there is good accessibility on foot.

As such any additional pressure on the local highways network is unlikely to be severe, and would not represent significant or demonstrable harm that would be contrary to Policy DM24 of the Sites and Policies Plan Part 1.

Issue 4: Ecology

The site is located within the 5km protection zone for the North Somerset and Mendip Bats SAC. Policy CS4 of the Core Strategy seeks to protect priority habitats and development that could directly or indirectly harm protected species will not be permitted unless the harm can be avoided or mitigated.

An extended phase 1 ecology survey, bat activity surveys and protected species surveys have been undertaken by ecologists appointed by the developer. These surveys and reports identified the presence of a low number of horseshoe bats using the dividing

northern and western hedgerows for occasional commuting and foraging habitat. Two badger setts have also been identified on the site. As part of the agreed mitigation strategy, the existing hedgerows at the northern and western boundaries, and the dividing hedgerow between the eastern and central fields, will be retained and managed traditionally. The existing hedgerows providing foraging resource for bats will be retained.

Light spill from street lighting in Greenhill Road already adversely impacts bat activity, particularly over the eastern field. A condition requiring the submission and approval of a lighting plan which avoids illumination of the hedgerows will ensure no further adverse impact on bats present on the site.

The proposed mitigation strategy for the site includes measures to retain and protect hedgerows and trees, the incorporation of ecological buffer zones within the indicative layout, and the creation of a SuDS system. It is considered no significant loss of habitat for horseshoe bats will result from the development proposals. Important habitats, namely the hedgerows, will be retained and subject to appropriate management.

A Habitats Regulations Assessment has been produced and reviewed by Natural England as required by the Wildlife and Countryside Act 1981. Natural England have confirmed that they are satisfied with the conclusion of the HRA that the proposed development would not result in a significant effect on European protected species, subject to the conditions as detailed in the HRA. This has taken into account the additional assessment of cumulative impacts, where the HRA has provided an adequate assessment of 'in-combination' effects in accordance with the requirements of the Habitat Regulations.

With regard to the badger presence on site a licence to close the setts will need to be obtained from Natural England. Provided a suitable location for an artificial replacement sett can be identified and secured, in reasonable proximity to the existing setts, it is anticipated that a closure licence from Natural England could be obtained.

Subject to the imposition of appropriately worded conditions to cover matters including retained habitats, ecological buffer zones and a lighting plan, it is considered that the proposal will not have an adverse impact to ecology and protected species.

Issue 5: Flood risk and drainage

The site is located in Flood Zone 1 and the NPPF states that the principle of residential development is acceptable in this flood zone and the application does not need to be accompanied by a sequential or exceptions test.

With regard to surface water drainage, drainage ditches run parallel to the northern and eastern site boundaries. In addition, two ditches pass through the site flowing in a north to south direction. The site layout has been amended to include an attenuation pond at the lowest part of the site in the north-west corner. The two ditches that cross the site will be retained and the indicative layout allows for a 5m maintenance buffer. The applicant has submitted indicative surface and foul water drainage strategies involving controlled and attenuated surface water discharge to the existing surrounding drainage ditches. Foul water drainage is via a pumped discharge to existing Wessex Water infrastructure.

Policy CS2 of the Core Strategy and the Creating Sustainable Buildings and Places SPD support the use of Sustainable Urban Drainage and it would be expected to see SUDs on

this development. The drainage system must be designed so that, unless an area is designated to flood as part of the design, flooding does not occur on any part of the site for a 1 in 30-year rainfall event and that at 1 in 100-year rainfall event no flooding occurs to any part of a building or in any utility plant susceptible to water, such as pumping station or electricity substation, within the development. Any flows resulting from rainfall in excess of a 1 in 100-year rainfall event should be managed in conveyance routes that minimise the risks to people and property.

Subject to the imposition of conditions to establish the detailed design of the SUDs system it is considered the site will not be at undue risk from surface water flooding and will not increase risk elsewhere as a result of the proposed development. The drainage strategy will ensure sufficient and appropriate measures are put in place to ensure surface and foul water is appropriately managed. With the inclusion of appropriately worded drainage conditions, the application accords with the NPPF and Policy CS2 of the Core Strategy.

Issue 6: Living conditions

The application site is positioned to the rear of properties along Greenhill Road and to the south of a group of dwellings accessed from Greenhill Lane. Towards the western end of the site these neighbouring properties are set within good sized plots, although from the centre where Greenhill Croft projects into the site and onwards towards the eastern edge of the site the plot sizes taper in.

The properties along Greenhill Road have a slightly elevated view over the application site and across the levels landscape beyond. Whilst residents will no doubt attach substantial value to these views, it is an established principle of the planning system that little weight can be given towards the protection of a private view. With regard to outlook and privacy, it is considered that the site layout could be planned so as not to result in significant adverse impact to existing occupiers and subject to a minimum separation distance of 21m which would be sufficient to avoid any unacceptable loss of privacy from facing windows. A further assessment would need to be undertaken at reserved matters stages to ensure the scale, massing and orientation of dwellings around the southern periphery of the application site accord with the adopted North Somerset Residential Design Guide SPD. This would also require additional details with regard to relative heights in relation to existing dwellings at the boundary of the site and details of boundary treatments.

Issue 7: Impact to nearby listed buildings

A small area of the proposed development sits opposite the Grade II listed Pool Farmhouse and the listing extends to the curtilage listed barn which sits along the pavement on the opposite side of Greenhill Road from the proposed access to the development site.

The setting of this barn, which is already compromised by the A368 will be impacted on by the proposed development, and although the main listed building cannot be seen from the road due to the position of the barn and the large hedgerows, its setting will still be affected by the development. The setting of the listed buildings does not only include visual impact to the buildings but also the extra noise and traffic generated from the development site.

At the reserved matters stage further screening would be needed on the development site to mitigate impacts to the listed building. Setting any new building back from the site entrance would also aid this and allow for a more green entrance to the site which would act as a further buffer between the proposed development and the listed buildings. The current area of green land here does add character to this area of the village in general. The design and access statement identifies the new buildings to be no more than two storey, and keeping them to this level will help to ensure a lesser impact to the listed buildings.

In the wider context it is considered any impact to the setting of the listed buildings is likely to range from negligible to less than substantial harm depending on whether the final layout provides more screening as well as the setting back of any new buildings adjacent to the site entrance.

Issue 8: Development contributions

Policy CS34 of the Core Strategy and Policy DM71 of the emerging Sites and Policies Plan Part 1 set out the requirement and mechanism to seek developer contributions to mitigate the impacts of a development proposal. Further guidance is provided in the Development Contributions SPD.

Community Infrastructure Levy

The Council's Community Infrastructure Levy (CIL) Charging Schedule took effect on 18 January 2018. This means that in the event that planning permission is granted, the development will be liable to pay the CIL. The Charging Schedule and supporting information can be viewed at n-somerset.gov.uk/cil.

As part of adopting the CIL, a formal list (known as the "Regulation 123 List") has been published setting out which infrastructure will be funded through the CIL and which will remain the subject of S106 planning obligations. The Council is not permitted to enter into S106 agreements requiring infrastructure that is to be funded through the CIL.

In this case items to be provided through S106 planning obligations are affordable housing, on-site green infrastructure including transfer of land for a playing field, provision of a footpath link to the western boundary and financial contribution for a footbridge to complete the link to the adjacent Strongvox site, and measures to promote the use of sustainable transport by residents of the site (travel packs). Any other requirements will be mitigated through the payment of CIL.

Affordable Housing

Policy CS16 of the Core Strategy follows Government Policy and sets out the Council's policy on Affordable Housing and says the trigger for on-site provision are schemes of 10 or more dwellings. There is no upper limit on affordable housing provision, but 30% of the total housing number provided as 'affordable housing' is the normal requirement. The applicants have agreed that they would deliver 30% of the homes as 'affordable housing' units which, based on a total of up to 85 units coming forward equates to an affordable housing requirement of 26 of the units. This will require a tenure split of 82% social rent and 12% shared ownership.

Green Infrastructure

On-site provision of green infrastructure, the provision of a footpath to the western boundary and financial contribution of £30,000 for a new footbridge to link with the Strongvox site. On-site provision will require 15 year commuted maintenance sums to be paid prior to adoption, where the land is to be transferred to and maintained by North Somerset Council or Sandford and Winscombe Parish Council.

This will also include the transfer of land to the rear of the primary school for use as a playing field with the developer to make arrangements under licence for the removal of the existing badger sett, the erection of a 2.4m fence to the Councils specification, and provision of 6 parking spaces adjacent to the school.

Highways

There is a requirement to seek a contribution of £120 per dwelling towards Travel Information Packs, public transport taster tickets and cycle vouchers.

Natural Environment and Rural Communities (NERC) Act 2006

The proposed development will not have a material detrimental impact upon bio-diversity subject to the adherence to conditions set out in the HRA.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

The proposed development has been screened separately under the above Regulations and has been found not to constitute 'EIA development'. An Environmental Statement is not, therefore, required.

The Crime and Disorder Act 1998

The proposed development will not have a material detrimental impact upon crime and disorder.

Local Financial Considerations

The Localism Act 2011 amended section 70 of the Town and Country Planning Act 1990 so that local financial considerations are now a material consideration in the determination of planning applications. This development is expected to generate New Homes Bonus contributions for the authority. However, it is considered that the development plan and other material considerations, as set out elsewhere in this report, continue to be the matters that carry greatest weight in the determination of this application.

Conclusion

Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF sets out the presumption in favour of sustainable development. Where relevant policies for the supply of housing are considered not to be up to date, this means granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF.

The Core Strategy identifies Sandford as an infill village where the restrictions inherent in Policy CS33 apply. The application site is on greenfield land outside the Sandford settlement boundary where a proposed development of up to 85 dwellings is in clear conflict with Policy CS33 and the locational strategy of the Core Strategy. As the spatial strategy has been subject to recent examination, and the Core Strategy policies are deemed to be NPPF compliant, it is a matter for the decision maker to determine the weight that can be afforded to this. Accordingly, the conflict with CS33 is given significant weight in the planning balance.

Nevertheless, as the Council is unable to demonstrate a five year supply of deliverable housing land, the tilted balance of paragraph 11 of the NPPF applies. This means the application has to be considered in the context of the presumption in favour of sustainable development unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of doing so. This too is given significant weight.

In terms of sustainable development, of note is the Inspectors decision on the adjacent Strongvox site, where he concluded that Sandford has "*a reasonable degree of sustainability when public transport accessibility to neighbouring settlements and Weston-super-Mare is taken into account*". Given the similarities between the sites when taken in a wider context, the appeal decision is a significant material consideration and accordingly carries weight in the planning balance.

The provision of an additional 85 dwellings, including affordable housing units contributes to housing supply and helps to meet the need for affordable housing. In the absence of a five-year housing land supply substantial weight is attached to these benefits.

The provision of green infrastructure on site, the retention of trees and hedgerows, and establishment of ecological buffer zones to support the bat population and protected species should be considered as made necessary by the development rather than benefits as such. Therefore, they carry only limited weight in favour of the scheme.

The site layout and proposed S106 includes provision of land as a playing field which will assist with the expansion of the Primary school. The school site is currently limited in size which is a constraint to its future growth and expansion. In terms of use of the land as a playing field this is a very a positive aspect of the proposal which carries significant weight in favour of the proposal. The creation of a footpath link and footbridge over the watercourse running between this and the Strongvox site to the west is of benefit where the provision of a Junior football pitch on the adjacent Strongvox land is central between the two developments and can serve both equally. This is considered to offer a more coherent use of space across both sites and is afforded some weight in favour.

Against the development the conflict with CS33 and the spatial strategy carries weight in the planning balance as set out above. The housing policies of the Core Strategy and Site Allocations Plan are consistent with the NPPF and the spatial strategy is underpinned by the notion of directing new housing to the most sustainable locations. However, in the absence of a five-year housing land supply the weight that can be afforded to Policy CS33 is tempered.

A change from open fields to housing could be seen as inherently harmful and weighs against the development in the planning balance. However, the policies of the NPPF do not offer blanket protection for all parts of the countryside but instead rely on an

assessment of harm and benefit. The site does not form part of a designated or protected landscape and as no significant or demonstrable harm will occur greater weight is given to housing delivery and thus landscape character impact is considered not to be a reason to refuse the application.

Adverse impacts will arise from additional traffic and transport pressures as well as fundamental change in the character of the village resulting from rapid unplanned growth, which will change the character of Sandford as a place to live. The proposal is not small scale and is not community led nor could it be said to provide environmental benefits. Nevertheless, through consultation responses assessing technical matters no other significant or demonstrable harmful impacts have been demonstrated that would outweigh the benefits associated with the provision of new housing which has been identified through the NPPF as a clear government priority.

Therefore, with some hesitation and on balance it is considered that as these adverse impacts do not outweigh the benefits associated with the development in the planning balance it is logical to conclude the application should be supported.

RECOMMENDATION: Subject to –

- (a) The expiry of the period for consultation and the consideration of any new issues arising as a result; and
- (b) the completion of a section 106 legal agreement securing financial contributions towards the provision of a footbridge linking with the development to the west of the site, provision of travel information packs, provision of 30% on site affordable housing, transfer of land for a playing field, and provision of footpath to the western boundary of the site

the application be **APPROVED** (for the reasons stated in the report above) subject to the following conditions and any other additional or amended conditions as may be required in consultation with the Chairman and Vice Chairman:

1. Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiry of three years from the date of this permission.

Reason: in accordance with the provisions of Section 92 of the Town and Country Planning Act 1990.

2. The development hereby permitted shall be begun before the expiry of two years from the date of approval of the last of the reserved matters to be approved.

Reason: in accordance with the provisions of Section 92 of the Town and Country Planning Act 1990.

3. Approval of the details of the scale, layout, appearance of the buildings and the landscaping of the site (hereinafter called ("the reserved matters")) shall be obtained from the Local Planning Authority, in writing before any development is commenced.

Reason: The application was submitted as an outline application in accordance with the provisions of Article 4 of the Town and Country

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Planning (Development Management Procedure) Order 2010 and in accordance with Policies DM32 of the Sites and Policies Plan Part 1 and Policy CS12 of the North Somerset Core Strategy.

4. The development hereby permitted shall be carried out in accordance with the approved plans:

Drawings

- Site location plan 160302 L 01 01
- Illustrative masterplan 160302 L02 02 Rev R
- Proposed access, general arrangement & visibility splays 1459.SKT04 Rev C
- Habitats parameters plan 160302 L 01 02

Reason: For the avoidance of doubt and in the interest of proper planning.

5. No more than 85 dwellings shall be erected on the application site.

Reason: To avoid an overdevelopment of the site which would be likely to result in a form of development that is out of keeping with the character and appearance of the site and surrounding area in accordance with Policy CS33 of the Core Strategy and DM32 of the Sites and Policies Plan Part 1.

6. No work shall be commenced until samples of the materials to be used in the development have been submitted to and approved, in writing, by the Local Planning Authority. The development shall be carried out in the approved materials unless otherwise agreed in writing.

Reason: To ensure that the materials are acceptable in the interests of the appearance of the area and in accordance with section 7 and paragraph 17 of the National Planning Policy Framework.

7. The dwellings shall not be occupied until details of a scheme for providing space and facilities for the storage and collection of waste have been submitted to and approved in writing by the Local Planning Authority and the approved scheme has been implemented. Thereafter the approved space and facilities for the storage and collection of waste shall be permanently retained unless otherwise agreed in writing with the local planning authority.

Reason: The local planning authority wishes to encourage sustainable waste collection initiatives in the interests of local amenity and sustainable waste shall be permanently retained unless otherwise agreed in writing with the Local Planning Authority.

8. No development shall commence until a tree and hedgerow retention plan identifying all existing trees and hedgerows to be retained has been submitted to, and approved in writing by the Local Planning

Authority.

Reason: To ensure that features of ecological and landscape importance are maintained and in accordance with Policy DM9 of the Sites and Policies Plan Part 1.

9. No development shall take place until a method statement identifying measures to protect all trees to be retained has been submitted to and approved in writing by the Local Planning Authority. The method statement shall include proposed tree protection measures during site preparation (including clearance and demolition work), construction and landscaping operations (including any changes to ground levels). Thereafter the site clearance works and development shall be undertaken in accordance with the approved details.

Reason: To ensure the protection of trees during the development process in the interests of the character and biodiversity of the area and in accordance with policies CS4 and CS5 of the North Somerset Core Strategy and Policy DM9 of the Sites and Policies Plan Part 1.

10. The reserved matters application for landscaping shall be accompanied by a detailed Landscape Masterplan and Strategy to demonstrate that the landscaping proposals have taken account of and been informed by the existing landscape characteristics of the site and by any loss of existing vegetation on the site.

Reason: To ensure that a satisfactory landscaping scheme is implemented and in accordance with Policies DM9, DM10 and DM32 of the Sites and Policies Plan Part 1.

11. Trees, hedges and plants shown in the landscaping masterplan and strategy to be submitted with the reserved matters application for landscaping, that are to be retained or planted which, during the development works for a period of ten years following full implementation of the landscaping scheme, are removed without prior written consent from the Local Planning Authority or die, become seriously diseased or are damaged, shall be replaced in the first available planting season with others of such species and size as the Authority may specify in accordance with DM9 and DM10 of the Sites and Policies Plan Part 1 Publication Version 2015.

Reason: To ensure as far as possible that the landscaping scheme is fully effective and in accordance with Policy DM9 and DM10 of the Sites and Policies Plan Part 1.

12. All landscaping works should be carried out during the months of October to March inclusive following occupation of the dwellings or completion of the development, whichever is the sooner.

Reason: To ensure that a satisfactory landscaping scheme is

implemented in accordance with policy CS9 of the North Somerset Core Strategy and policy DM9 of the North Somerset Sites and Policies Plan Part 1.

13. Details of the external lighting shall be provided at the Reserved Matters stage including:
- (i) details of the type and location of the proposed lighting;
 - (ii) existing lux levels affecting the site (dark and full moon);
 - (iii) the predicted lux levels; and
 - (iv) lighting contour plans.

The scheme shall ensure that light levels do not exceed 0.5 lux above base on features important to bats, including foraging habitat and flight lines and boundary buffer corridors. Any external lighting shall be installed and operated in accordance with the approved details and shall not be varied without agreement in writing from the Local Planning Authority.

Reason: To reduce the potential for light pollution in accordance with Policy CS12 of the Core Strategy, Policy DM8 of the Sites and Policies Plan Part 1 and to protect bat habitat in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended) and Wildlife and Countryside Act 1981 (as amended).

14. Prior to the commencement of development details of the fencing or means of enclosure to be provided around private gardens of the individual dwellings adjacent to the ecological buffer zones identified on the Habitats Parameters Plan 160302 L 01 02 shall be submitted to, and approved in writing by the Local Planning Authority. The fencing or means of enclosure shall be of sufficient height and standard to prevent light spill from individual dwellings onto the boundary hedgerows and ecological buffer zones. Thereafter the approved boundary treatment shall be constructed in accordance with the approved details for each dwelling before the occupation of that dwelling.

Reason: To reduce the potential for light pollution in accordance with Policy CS12 of the Core Strategy, Policy DM8 of the Sites and Policies Plan Part 1 and to protect bat habitat in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended) and Wildlife and Countryside Act 1981 (as amended).

15. Before commencement of development, a Construction Environment Management Plan (CEMP) shall be submitted to, and approved in writing, by the Local Planning Authority. This shall include mitigation measures required to protect legally protected species and their retained habitats from injury or damage and include information for construction workforce; timings of site clearance; details of appropriate fencing for buffer areas to protect retained on site habitats; overnight ramps placed within open trenches and daily checks of excavations for trapped wildlife; pre-commencement surveys for species that are

Planning and Regulatory Committee 8 August 2018

dynamic in distribution (e.g. badger); a walk over check by ecologist immediately prior to vegetation and other site clearance activities. The approved plan shall be implemented and adhered to during the vegetation clearance and construction phases.

Reason: To ensure the retained habitats and species are not adversely impacted by the proposed works in accordance with the Wildlife and Countryside Act 1981 (as amended); Wild Mammals Protection Act (1996) and policy CS4 of the Core Strategy policy CS4 and policy DM8 of the Site and Policies Plan Part 1.

16. Prior to the commencement of development, a Habitat Management Plan shall be submitted to, and approved in writing, by the Local Planning Authority. The plan shall cover a ten-year period and include measures for establishment, enhancement and management of habitats within the site, including planting schedules and details of ongoing management. This shall include a timetable for management activities as well as a monitoring schedule for habitats and species, including bat monitoring post completion.

Reason: To ensure the development contributes to the protection and enhancement of the site's ecology in accordance with policy CS4 of the Core Strategy and Site and policy DM8 of the Sites and Policies Plan Part 1.

17. None of the dwellings hereby approved shall be occupied until the new site access to Greenhill Road has been constructed and the related visibility splays have been provided in accordance with the details shown on Hydrock drawing 14591/SKT04 Rev C. The approved visibility splays shall be maintained free of vegetation or other obstruction above 600mm above the nearside carriageway level at all times thereafter.

Reason: in the interests of highway safety and in accordance with policy DM24 of the Sites and Policies Plan Part 1.

18. No dwelling hereby permitted shall be occupied until the access serving the dwelling has been completed in accordance with the details shown on the approved plans.

Reason: in the interests of highway safety and in accordance with policy DM24 of the Sites and Policies Plan Part 1.

19. Prior to the occupation of each dwelling, the relevant number of parking spaces for that dwelling will be provided in accordance with the North Somerset Parking Standards SPD.

Reason: To ensure that each dwelling has the necessary on-site parking provision and in accordance with the North Somerset Parking Standards SPD.

20. Prior to the commencement of development, a Construction Method Statement shall be submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
- i. The method and duration of any pile driving operations to include expected starting date and completion date
 - ii. The hours of work, which shall not exceed the following: construction and associated deliveries to the site shall not take place outside 07:00 to 19:00 hours Mondays to Fridays, and 08:00 to 16:00 Saturdays, nor at any times on Sundays or Bank Holidays
 - iii. The arrangements for prior notification to the occupiers of potentially affected properties
 - iv. The responsible person (e.g. site manager / office) who could be contacted in the event of complaint
 - v. measures to control the emission of dust and dirt during construction
 - vi. Details of wheel washing facilities
 - vii. The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
 - viii. A scheme for recycling/disposing of waste resulting from demolition and construction works
 - ix. The parking of vehicles of site operatives and visitors

Reason: In the interests of residential amenity and to ensure the safe operation of the highway and to minimise disruption.

21. No development shall take place until surface water drainage works have been implemented in accordance with details that have first been submitted to and approved in writing by the local planning authority. This shall provide for a sustainable drainage system in accordance with the principles set out in the National Planning Policy Framework, associated Planning Practice Guidance and the non-statutory technical standards for sustainable drainage systems, and the results of the assessment provided to the local planning authority. Where a sustainable drainage scheme is to be provided, the system shall be designed such that there is no surcharging for a 1 in 30-year event and no internal property flooding for a 1 in 100-year event + 40% allowance for climate change. The submitted details shall:
- a) provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site to greenfield run off rates and volumes, taking into account long-term storage, and urban creep and the measures taken to prevent pollution of the receiving groundwater and/or surface waters; temporary storage facilities, means of access for maintenance

(4 metres minimum to sustainable drainage elements) to prevent flooding.

- c) Any works and calculations required off site to ensure adequate discharge of surface water without causing flooding to existing properties and highways or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant)
- d) Flood water exceedance routes both on and off site
- e) Details of the management of the surface flow route through the site, so existing and new properties do not flood.

Reason: To secure a working drainage system to the approved strategy that shall therefore be implemented and retained in accordance with paragraph 17 and sections 10 and 11 of the National Planning Policy Framework, Paragraph 103 of the National Planning Policy Framework ;and the Technical Guidance to the National Planning Policy Framework (March 2015) and the Core Strategy policy CS3 and paragraph 1 of policy DM1: Flooding and Drainage of the North Somerset Council - Sites and Policies Plan Part 1 Development Management Policies.

22. The drainage works hereby permitted shall be maintained by the developer for 1 year prior to being offered to an approved body (approved by the LPA or LLFA) for maintenance, this must include all open watercourses. The system will then be maintained by the approved body for the lifetime of the development. In accordance with submitted details:
- a) As built drawings
 - b) Maintenance schedule and Operational manual.
 - c) Detailed plan of the drainage system, annotated with who maintains which parts including watercourses
 - d) Name and address of the operator and maintenance company
 - e) The developer will rectify any defects prior to hand over to an approved body within the set timetable.

Reason: To ensure that maintenance of the sustainable drainage system can be carried out for the lifetime of the development.

23. No development will take place within 5 metres of the top of bank of any watercourse on one bank to allow access for maintenance and a biodiversity corridor.

Reason: To ensure clear access for maintenance over the lifetime of the development and in accordance with policy CS3 of the North Somerset Core Strategy.

24. No culverting of watercourses on the site will take place except for access points without the agreement of the Local Planning Authority

Reason: To ensure that there is no restriction in the conveyance of the flow or volume of water. To preserve the biodiversity and habitats in the

water corridor and ensure that clear access to watercourses for maintenance is allowed.

25. The dwellings hereby approved shall, unless otherwise first agreed in writing by the Local Planning Authority, not be occupied until measures to generate 15% of the on-going energy requirements of the use (unless a different standard is agreed) through micro renewable or low-carbon technologies have been installed and are fully operational in accordance with the approved details that have been first submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved technologies shall be permanently retained unless otherwise first agreed in writing by the Local Planning Authority.

Reason: To proactively support the wider transition towards a low carbon future through the use of renewable and low carbon energy in accordance with policy CS1 of the North Somerset Core Strategy and policy DM2 of the North Somerset Site and policies Plan Part 1, Development Management.

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix VIII

Application of proposed formula for assessing housing need, with contextual data

Published 14th September 2017

All data is correct to the best of our knowledge as of publication.

Figures for authorities marked with * have not been verified by the authority, and may be subject to correction

ONS Code	Local Authority	Indicative assessment of housing need based on proposed formula, 2016 to 2026 (dwellings per annum)	Current local assessment of housing need, based on most recent publicly available document (dwellings per annum)	Proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest	Source for current assessment of housing need	Page reference in document (where available)	Most recent adopted Local Plan number ¹ (dwellings per annum)	Adoption date of Local Plan used in calculation of need based on proposed formula	Source for Local Plan used in calculation of need based on proposed formula	Page number reference in document (where available)
E07000223	Adur	412	Local assessment of need not available	55%	-	-	No adopted plan number	-	-	-
E07000026	Allerdale	125	134	52%	http://www.allerdale.gov.uk/dowr	7	304	01 July 2014	http://www.allerdale.gov	22
E07000032	Amber Valley	404	435	34%	http://info.ambervalley.gov.uk/doi	63	No adopted plan number	-	-	-
E07000224	Arun	1,199	919	47%	http://www.arun.gov.uk/local-plar	136	No adopted plan number	-	-	-
E07000170	Ashfield	519	480	42%	http://www.ashfield.gov.uk/media	238	No adopted plan number	-	-	-
E07000105	Ashford	989	825	38%	http://www.ashford.gov.uk/down	27	1,197	01 July 2008	http://www.ashford.gov.i	8
E07000004	Aylesbury Vale	1,499	965	6%	https://www.aylesburyvaledc.gov	-	No adopted plan number	-	-	-
E07000200	Babergh	439	355	15%	http://www.midsuffolk.gov.uk/ass	-	325	25 February 2014	http://www.midsuffolk.gc	31
E09000002	* Barking & Dagenham	2,089	1,264	15%	https://www.newham.gov.uk/Doc	15	1,190	21 July 2010	https://www.lbbd.gov.uk	26
E09000003	* Barnet	4,126	Local assessment of need not available	28%	-	-	1,867	11 September 2012	https://www.barnet.gov.i	47
E08000016	Barnsley	898	967 - 1389	79%	https://www.barnsley.gov.uk/mec	29	1,194	08 September 2011	https://www.barnsley.gov	70
E07000027	Barrow-in-Furness	0	63 - 133	11%	https://data.barrowbc.gov.uk/dat	-	No adopted plan number	-	-	-
E07000066	Basildon	1,024	972 - 986	63%	http://www.basildon.gov.uk/CHtt	88	No adopted plan number	-	-	-
E07000084	Basingstoke and Deane	974	850	33%	https://www.basingstoke.gov.uk/	14	850	26 May 2016	https://www.basingstoke	33
E07000171	Bassetlaw	324	435 - 500	2%	https://www.bassetlaw.gov.uk/m	171	350	22 December 2011	http://www.bassetlaw.gc	21
E06000022	Bath & North East Somerset	626	729	76%	http://www.bathnes.gov.uk/sites/	21	722	10 July 2014	http://www.bathnes.gov	22
E08000055	Bedford	1,281	950	0%	http://www.bedford.gov.uk/pd/S	118	879	16 April 2008	https://www.bedford.gov	23
E09000004	Bexley	1,723	963	18%	https://www.lewisham.gov.uk/my	106 & 195	335	22 February 2012	https://www.bexley.gov.i	9
E08000025	Birmingham	3,577	4,450	14%	https://www.birmingham.gov.uk/i	8	2,555	01 January 2017	https://www.birmingham	28
E07000129	Blaby	345	370	1%	http://www.chamwood.gov.uk/flk	186	380	21 February 2013	http://www.blaby.gov.uk	26
E06000008	Blackburn with Darwen	153	300 - 530	57%	https://www.blackburn.gov.uk/Ne	113	625	01 December 2015	http://www.blackburn.gc	40
E06000009	Blackpool	93	250 - 400	3%	https://www.blackpool.gov.uk/Re	198	280	01 January 2016	https://www.blackpool.g	36
E07000033	* Bolsover	244	235 - 240	7%	http://www.bolsover.gov.uk/mag	11	No adopted plan number	-	-	-
E08000001	Bolton	798	821	52%	https://gmsf-consult.objective.co	187	694	02 March 2011	http://www.bolton.gov.uk	51
E07000136	Boston	260	302	4%	https://www.peterborough.gov.uk	9	No adopted plan number	-	-	-
E06000028	Bournemouth	1,022	979	15%	https://www.dorsetforyou.gov.uk	9	730	30 October 2012	https://www.bournemouth	38
E06000036	Bracknell Forest	670	635	48%	http://consult.bracknell-forest.gov	369	557	01 July 2013	https://files.bracknell-for	31
E08000032	Bradford	1,663	2,200	66%	https://www.bradford.gov.uk/Doc	17 & 18	2,476	17 July 2017	https://bradford.modern	8
E07000067	Braintree	835	716	0%	http://www.braintree.gov.uk/dow	74	273	01 September 2011	https://www.braintree.c	47
E07000143	Breckland	680	612	18%	https://www.south-norfolk.gov.uk	11	764	01 December 2009	https://www.breckland.g	28
E09000005	Brent	2,855	1,826	1%	https://www.brent.gov.uk/media/	-	1,100	12 July 2010	https://www.brent.gov.uk	-
E07000068	Brentwood	454	362	90%	http://www.brentwood.gov.uk/pd	65	No adopted plan number	-	-	-
E06000043	Brighton & Hove	924	1,506	45%	https://www.brighton-hove.gov.uk	10	660	01 March 2016	https://www.brighton-ho	131
E06000023	Bristol	2,420	1,450	7%	https://www.bristol.gov.uk/docum	53	1,530	21 June 2011	https://www.bristol.gov.i	55
E07000144	Broadland	528	391	14%	https://www.south-norfolk.gov.uk	11	706	01 January 2014	https://www.broadland.g	43
E09000006	* Bromley	2,564	1150 - 1488	51%	https://www.lewisham.gov.uk/my	106 & 195	No adopted plan number	-	-	-
E07000234	Bromsgrove	364	349	89%	http://www.bromsgrove.gov.uk/m	12 & 13	368	25 January 2017	http://www.bromsgrove.i	19
E07000095	Broxbourne	559	454	64%	https://www.broxbourne.gov.uk/s	36	No adopted plan number	-	-	-
E07000172	Broxtowe	360	Local assessment of need not available	64%	-	-	362	17 September 2014	https://www.broxtowe.g	44
E07000117	Burnley	70	117 - 215	22%	http://www.burnley.gov.uk/sites/c	182	No adopted plan number	-	-	-
E08000002	Bury	597	610	60%	https://gmsf-consult.objective.co	187	No adopted plan number	-	-	-
E08000033	Calderdale	840	946 - 1169	73%	https://www.calderdale.gov.uk/er	ii	No adopted plan number	-	-	-
E07000008	* Cambridge	583	700	24%	https://www.scams.gov.uk/sites	36	No adopted plan number	-	-	-
E09000007	Camden	1,568	1,117	1%	https://www.camden.gov.uk/ccm	98	1,120	03 July 2017	http://camden.gov.uk/cc	41
E07000192	Cannock Chase	295	250 - 280	64%	https://www.cannockchasedc.gov	92	241	01 June 2014	https://www.cannockchc	46
E07000106	Canterbury	1,096	800	36%	https://www.canterbury.gov.uk/m	46	800	13 July 2017	https://www.canterbury	46
E07000028	Carlisle	211	480 - 565	16%	http://www.carlisle.gov.uk/Portals	-	565	08 November 2016	http://www.carlisle.gov.u	30
E07000069	* Castle Point	342	326 - 410	55%	https://www.rochford.gov.uk/sites	4	No adopted plan number	-	-	-
E06000056	Central Bedfordshire ²	2,553	1,800	40%	http://www.centralbedfordshire.g	-	718	01 November 2009	http://www.centralbedfo	-
E07000130	Central Lincolnshire	1,131	1,432	4%	https://www.n-kesleaven.gov.uk/	-	1,665	24 April 2017	https://www.n-kesleaven	13
E07000103	Chamwood	1,045	994	4%	http://www.chamwood.gov.uk/flk	186	820	09 November 2015	http://www.chamwood.g	30
E07000070	Chelmsford	980	805	39%	http://www.braintree.gov.uk/dow	74	700	20 February 2008	https://www.chelmsford	5
E07000078	* Cheltenham	534	450 - 539	40%	http://www.gch-jcs.org/Document	4	No adopted plan number	-	-	-
E07000177	Chenwell	762	1,142	15%	http://www.google.co.uk/ur?sa=	6	1,142	20 July 2015	http://www.chenwell.gov	13
E06000049	Cheshire East	1,142	1,800	43%	http://www.cheshireeast.gov.uk/t	16	1,800	27 July 2017	http://www.cheshireeast	18
E06000050	Cheshire West and Chester	680	1,100	44%	http://www.flintshire.gov.uk/en/PI	8	1,100	29 January 2015	http://consult.cheshirew	24
E07000034	Chesterfield	252	240 - 300	22%	https://www.chesterfield.gov.uk/n	182	380	24 July 2013	https://www.chesterfield	41
E07000225	Chichester	609	505	74%	http://www.chichester.gov.uk/CH	11	435	01 July 2015	http://www.chichester.g	48
E07000005	Chiltern	316	331 - 336	90%	https://www.aylesburyvaledc.gov	11	139	01 November 2011	http://www.chiltern.gov.i	27
E07000118	Chorley	634	417	80%	http://chorley.gov.uk/Documents	18	417	17 July 2012	http://chorley.gov.uk/Do	16
E07000048	Christchurch	See Christchurch and East Dorset	241	65%	https://www.dorsetforyou.gov.uk	9	se Christchurch and East Dor	01 April 2014	https://www.dorsetforyo	28
E07000048	Christchurch & East Dorset	792	626	-	https://www.dorsetforyou.gov.uk	-	566	01 April 2014	https://www.dorsetforyo	-
E09000001	City of London	120	125	0%	https://www.cityoflondon.gov.uk/	-	110	15 January 2015	https://www.cityoflond	-
E07000071	Colchester	1,095	920	15%	http://www.colchester.gov.uk/CH	-	843	11 December 2008	http://www.colchester.g	52
E07000029	Copeland	32	230	69%	http://www.copeland.gov.uk/sites	38	277	01 December 2013	http://www.copeland.g	192
E07000150	Corby	489	460	1%	http://www.nnpu.org.uk/docs/Jo	-	460	14 July 2016	http://www.nnpu.org.uk	-
E06000052	Cornwall	2,889	2,625	29%	https://www.cornwall.gov.uk/mec	10	2,625	22 November 2016	https://www.cornwall.g	19
E07000079	Cotswold	421	420	79%	http://consult.cotswold.gov.uk/fl	26	No adopted plan number	-	-	-
E08000026	Coventry	2,329	2,120	31%	Draft policy DS1 - http://www.cov	-	No adopted plan number	-	-	-
E07000163	Craven	151	214	76%	http://www.cravencdc.gov.uk/CHT	85	No adopted plan number	-	-	-

E07000226	Crawley	476	675	1%	http://www.crawley.gov.uk/pw/we	9	340	01 December 2015	http://www.crawley.gov.uk	75	
E09000008	* Croydon	1,414	2,440	27%	https://www.croydon.gov.uk/sites	101	1,010	22 April 2013	https://www.croydon.gov.uk	18	
E07000096	Dacorum	602	756	77%	https://www.watford.gov.uk/down	187	430	25 September 2013	https://www.dacorum.gov.uk	1	
E06000005	Darlington	177	446	0%	http://www.darlington.gov.uk/me	9	482	06 May 2011	http://www.darlington.gov.uk	47	
E07000107	Dartford	778	585	56%	http://www.google.co.uk/urif?sa=i	29	865	26 September 2011	http://www.windmz.dartford.gov.uk	57	
E07000151	Daventry	384	389	1%	http://www.westnorthamptonshire.gov.uk	100	389	15 December 2014	http://www.westnorthamptonshire.gov.uk	35	
E06000015	Derby	890	964	4%	http://www.south-derbyshire.gov.uk	161	647	25 January 2017	http://www.derby.gov.uk	29	
E07000035	Derbyshire Dales	230	284	58%	http://www.derbyshiredales.gov.uk	5	-	No adopted plan number	-	-	
E08000017	Doncaster	585	920	46%	https://dmbcpbkwelbwebblob.c	3	1,230	18 May 2012	http://www.doncaster.gov.uk	58	
E07000108	Dover	594	529	26%	https://www.dover.gov.uk/Planni	-	505	01 February 2010	https://www.dover.gov.uk	-	
E08000027	Dudley	601	547 - 553	19%	http://blackcountrycorestrategy.d	67	806	01 February 2011	http://blackcountrycores	64	
E06000047	Durham	1,368	-	43%	-	-	-	No adopted plan number	-	-	
E09000009	Ealing	2,432	Local assessment of need not available	6%	-	-	933	03 April 2012	https://www.ealing.gov.uk	10	
E07000009	East Cambridgeshire	598	526 - 586	6%	http://www.cambridgeshireinsigh	38	575	21 May 2014	https://www.eastcamb.	26	
E07000040	East Devon	844	919 - 981	58%	http://eastdevon.gov.uk/medial/1	-	950	28 January 2016	http://eastdevon.gov.uk/	-	
E07000049	East Dorset	See Christchurch and East Dorset	385	85%	https://www.dorsetforoy.gov.uk	9	-	See Christchurch and East Dor	01 April 2014	https://www.dorsetforoy	28
E07000085	East Hampshire	617	520 - 610	58%	http://www.easthants.gov.uk/sfra	107	492	01 June 2014	http://www.easthants.gov	41	
E07000242	East Hertfordshire	1,111	745	37%	https://www.eastherts.gov.uk/art	-	-	No adopted plan number	-	-	
E07000137	East Lindsey	387	Local assessment of need not available	25%	-	-	-	No adopted plan number	-	-	
E07000152	* East Northamptonshire	463	420	3%	http://www.nniju.org.uk/docs/20	17	420	14 July 2016	http://www.nniju.org.uk	132	
E06000011	East Riding of Yorkshire	991	830 - 1459	1%	http://www2.eastriding.gov.uk/en	14	1,400	06 April 2016	http://www2.eastriding.g	52	
E07000193	East Staffordshire	225	613	2%	http://www.eaststaffsb.gov.uk/si	151	613	01 October 2015	http://www.eaststaffsb.	83	
E07000061	Eastbourne	336	555 - 743	42%	http://www.eastbourne.gov.uk/r	-	240	01 February 2013	http://www.eastbourne.g	4	
E07000086	Eastleigh	715	630	3%	http://www.push.gov.uk/2c_ obje	115	-	No adopted plan number	-	-	
E07000030	Eden	108	242	64%	https://www.eden.gov.uk/media/c	73	239	31 March 2010	https://www.eden.gov.uk	18	
E07000207	Elmbridge	582	474	58%	http://www.elmbridge.gov.uk/plar	194	225	01 July 2011	http://www.elmbridge.g	23	
E09000010	* Enfield	3,330	1695 - 2400	38%	https://new.enfield.gov.uk/service	83	733	01 November 2010	https://new.enfield.gov	15	
E07000072	* Epping Forest	923	514	94%	https://www.utlesford.gov.uk/CH	101	-	No adopted plan number	-	-	
E07000208	Epsom and Ewell	579	418	46%	http://www.epsom-ewell.gov.uk/s	194	181	01 July 2007	http://www.epsom-ewell	29	
E07000036	Erewash	397	368	71%	https://www.erewash.gov.uk/mec	21	368	06 March 2014	https://www.erewash.g	20	
E07000041	Exeter	627	589 - 639	3%	https://drive.google.com/open?id	108	600	21 February 2012	https://exeter.gov.uk/me	19	
E07000087	Fareham	531	420	3%	http://www.fareham.gov.uk/PDF/	-	147	01 August 2011	http://www.fareham.gov	78	
E07000010	Fenland	511	600	3%	https://www.westsuffolk.gov.uk/p	2	550	08 May 2014	http://www.fenland.gov	18	
E07000201	Forest Heath	367	340	32%	http://www.westsuffolk.gov.uk/pl	-	320	12 May 2010	http://www.westsuffolk.g	14	
E07000080	Forest of Dean	371	256 - 338	14%	http://www.fdean.gov.uk/media/2	-	310	23 February 2012	http://www.fdean.gov.uk	32	
E07000119	Fyde	296	415	12%	http://www.fyde.gov.uk/assets/le	30	-	No adopted plan number	-	-	
E08000037	Gateshead	470	475	60%	https://www.newcastle.gov.uk/sit	11	425	26 March 2015	www.gateshead.gov.uk	78	
E07000173	Gedling	468	Local assessment of need not available	75%	-	-	426	10 September 2014	http://www.gedling.gov	44	
E07000081	Gloucester	657	718	0%	http://www.gloucester.gov.uk/res	2	-	No adopted plan number	-	-	
E07000088	Gosport	238	335	4%	http://www.push.gov.uk/2c_ obje	112	170	01 October 2015	https://www.gosport.g	26	
E07000109	Gravesham	508	363	78%	http://www.gravesham.gov.uk/	8	363	01 September 2014	http://selfservice.graves	35	
E07000145	Great Yarmouth	338	420	37%	https://www.great-yarmouth.gov.	77	420	01 December 2015	https://www.great-yarm	39	
E09000011	Greenwich	3,317	350	2%	https://www.lewisham.gov.uk/my	106 & 195	2,595	30 July 2014	http://www.royalgreenw	49	
E07000209	Guildford	789	654	89%	http://www.guildford.gov.uk/newl	169	-	No adopted plan number	-	-	
E09000012	Hackney	3,251	1,758	0%	https://www.hackney.gov.uk/mec	52	1,160	24 November 2010	https://www.hackney.g	51	
E06000006	Halton	285	466	32%	https://www3.halton.gov.uk/Page	-	552	01 April 2013	https://www3.halton.g	41	
E07000164	Hambleton	226	296 - 325	21%	https://www.hambleton.gov.uk/ld	-	260	03 April 2007	https://www.hambleton.	30	
E09000013	Hammersmith & Fulham	980	844	0%	https://www.tbfh.gov.uk/sites/def	133	615	19 October 2011	https://www.hillingdon	95	
E07000131	Harborough	542	542	1%	http://www.charnwood.gov.uk/file	186	350	14 November 2011	http://www.harborough.	24	
E09000014	* Harrogate	1,148	1,357	2%	http://www.harrogate.gov.uk/sites	132	820	18 March 2013	http://www.cartogold.c	2	
E07000073	* Harlow	468	268	22%	https://www.utlesford.gov.uk/CH	101	-	No adopted plan number	-	-	
E07000165	Harrogate	395	669	54%	https://www.harrogate.gov.uk/do	5	390	11 February 2009	https://www.harrogate.g	15	
E09000015	Harrow	1,959	Local assessment of need not available	21%	-	-	233	16 February 2012	http://www.harrow.gov	24	
E07000089	Hart	292	382	13%	http://www.rushmoor.gov.uk/CHI	8	-	No adopted plan number	-	-	
E06000001	Hartlepool	213	290	3%	https://www.google.co.uk/urif?sa	9	-	No adopted plan number	-	-	
E07000062	Hastings	280	404	20%	http://www.planvu.co.uk/hbc2011	-	200	01 February 2014	http://www.planvu.co.uk	-	
E07000090	Havant	463	450	9%	http://www.push.gov.uk/2c_ obje	112	315	01 March 2011	https://www.havant.g	56	
E09000016	Havering	1,821	1,366	56%	https://www.newham.gov.uk/Doc	15	535	23 July 2008	https://www3.havering.g	73	
E06000019	Herefordshire	895	771 - 812	11%	https://www.herefordshire.gov.uk	61	825	01 October 2015	https://councillors.heref	32	
E07000098	Hertsmere	372	599	79%	https://www.watford.gov.uk/down	187	266	01 January 2013	https://www.hertsmere.g	38	
E07000037	High Peak	281	315 - 340	84%	https://www.highpeak.gov.uk/me	90	350	14 April 2016	https://www.highpeak.g	40	
E09000017	Hillingdon	595	3,081	43%	http://www.hillingdon.gov.uk/mec	46	425	08 November 2012	https://www.hillingdon.g	63	
E07000132	Hinckley and Bosworth	0%	454	0%	http://www.charnwood.gov.uk/file	186	450	15 December 2009	http://www.hinckley-bos	22	
E07000227	Horsham	974	650	25%	https://www.horsham.gov.uk/ c	1	800	27 November 2015	https://www.horsham.g	54	
E09000018	* Hounslow	1,151	1,556	22%	https://hounslow.app.box.com/s/	3	822	15 September 2015	https://www.hounslow.g	92	
E07000011	Huntingdonshire	1,010	804	3%	http://www.huntingdonshire.gov.	34	560	23 September 2009	http://www.huntingdonsh	42	
E07000120	* Hyndburn	60	180 - 350	58%	https://www.hyndburnbc.gov.uk/	114	213	19 January 2012	https://www.hyndburnbc	6	
E07000202	Ipswich	442	519	1%	http://www.babergh.gov.uk/asset	80	489	22 February 2017	https://www.google.co	40	
E06000046	Isle of Wight	641	525	50%	http://www.push.gov.uk/2c_ obje	115	520	21 March 2012	https://www.iwight.com/	5	
E06000053	Isles of Scilly	0	8	70%	http://www.scilly.gov.uk/sites/def	18	-	No adopted plan number	-	-	
E09000019	Islington	2,583	1,150	0%	https://www.london.gov.uk/what	-	1,264	17 February 2011	https://www.london.g	-	
E09000020	Kensington & Chelsea	824	575	0%	https://www.london.gov.uk/what	-	600	01 December 2010	https://www.london.g	-	
E07000153	Kettering	521	520	1%	http://www.nniju.org.uk/docs/20	16	520	14 July 2016	http://www.nniju.org.uk	132	
E07000146	Kings Lynn & West Norfolk	525	670	14%	https://www.west-norfolk.gov.uk/	75 & 101	660	28 July 2011	https://www.west-norfo	37	
E06000010	Kingston upon Hull	409	562	0%	http://hulco-consult.limehouse.c	-	-	No adopted plan number	-	-	
E09000021	Kingston Upon Thames	1,527	717	17%	https://www.kingston.gov.uk/dow	194	375	17 April 2012	https://www.kingston.g	154	
E08000034	* Kirklees	1,707	1,730	73%	https://www.kirklees.gov.uk/beta	13	-	No adopted plan number	-	-	
E08000011	Knowsley	275	Local assessment of need not available	49%	-	-	450	01 January 2016	https://localplanmaps.kn	53	
E09000022	Lambeth	1,673	Local assessment of need not available	0%	-	-	1,195	23 September 2016	https://www.london.g	-	
E07000121	Lancaster	401	650 - 700	59%	https://www.lancaster.gov.uk/ass	82	700	01 December 2014	https://www.lancaster.g	12	
E08000035	Leds	2,649	3,660	62%	http://hogarchnp.org.uk/sales/td	39	4,375	12 November 2014	http://www.leds.gov.uk	48	
E06000016	* Leicester	826	1230 - 1330	0%	http://www.charwood.gov.uk/flk	186	1,280	01 July 2014	https://www.leicester.g	51	
E07000063	Lewes	483	460 - 520	57%	http://www.lewes.gov.uk/Files/pl	45	345	11 May 2016	http://www.lewes.gov.uk	51	
E09000023	Lewisham	3,181	1,670	0%	https://www.lewisham.gov.uk/my	106 & 195	1,069	29 June 2011	https://www.lewisham.g	36	

E07000194	Lichfield	340	410 - 450	46%	https://www.lichfieldcc.gov.uk/Cc	92	478	01 February 2015	https://www.lichfieldcc.g	50
E07000138	Lincoln	See Central Lincolnshire	Local assessment of need not available	3%	-	-	See Central Lincolnshire	24 April 2017	https://www.n-kesteven.	13
E08000012	Liverpool	1,682	1,480	5%	http://liverpool.gov.uk/media/135	199	No adopted plan number	-	-	-
E06000032	Luton	1,417	890	4%	http://www.centralbedfordshire.g	90	No adopted plan number	-	-	-
E07000110	Maidstone	1,236	883	29%	http://maidstone-consult.limehou	15	No adopted plan number	-	-	-
E07000074	* Maldon	302	280	6%	https://www.maldon.gov.uk/publi	36	No adopted plan number	-	-	-
E07000235	Malvern Hills	329	210 - 338	8%	https://www.malvern hills.gov.uk/c	84	235	01 February 2016	www.swdevelopmentpla	-
E08000003	* Manchester	2,661	3,120	15%	https://gmsf-consult.objective.co	187	3,333	11 July 2012	http://www.manchester.r	97
E07000174	Mansfield	291	376	2%	http://www.ashfield.gov.uk/media	238	No adopted plan number	-	-	-
E06000035	* Medway	1,665	730 - 1410	23%	http://www.medway.gov.uk/pdf/a	12	No adopted plan number	-	-	-
E07000133	Melton	207	195 - 245	0%	https://docs.wixstatic.com/ugd/a*	-	No adopted plan number	-	-	-
E07000187	Mendip	588	411 - 498	16%	https://www.tauntondeane.gov.u	2	420	15 December 2014	http://www.mendip.gov.i	40
E09000024	Merton	1,585	279	7%	https://www2.merton.gov.uk/mer	94	320	13 July 2011	http://www2.merton.gov	103
E07000042	* Mid Devon	366	359 - 381	7%	https://www.middevon.gov.uk/mr	108	340	01 July 2007	https://www.middevon.g	29
E07000203	Mid Suffolk	573	452	0%	https://www.midsuffolk.gov.uk/ass	-	430	04 September 2008	http://www.midsuffolk.g	50
E07000228	Mid Sussex	1,016	876	60%	http://www.midsussex.gov.uk/me	-	No adopted plan number	-	-	-
E06000002	Middlesbrough	267	422	0%	https://www.middlesbrough.gov.i	121	410	01 November 2014	https://www.middlesbro	15
E06000042	Milton Keynes	1,831	1,766	0%	https://www.milton-keynes.gov.u	9	1,750	10 July 2013	https://www.milton-keyn	24
E07000210	Mole Valley	441	391	77%	https://www.molevalley.gov.uk/m	194	188	01 October 2009	http://molevalley-consul	27
E07000091	New Forest	965	Local assessment of need not available	86%	-	-	196	26 October 2009	http://www.newforest.g	50
E07000175	Newark and Sherwood	510	454	12%	http://www.newark-sherwood.c	238	740	29 March 2011	http://www.newark-shan	24
E08000021	* Newcastle on Tyne	1,073	1,663	35%	https://www.newcastle.gov.uk/sit	11	950	26 March 2015	https://www.newcastl	78
E07000195	Newcastle under Lyme	361	586	45%	https://www.stoke.gov.uk/directo	51	285	01 October 2009	https://www.newcastl	43
E09000025	Newham	3,840	2,355	2%	https://www.newham.gov.uk/Doc	15	2,500	26 January 2012	https://www.newham.g	35
E07000043	North Devon	311	444	25%	http://www.northdevon.gov.uk/m	246	No adopted plan number	-	-	-
E07000050	North Dorset	366	330	39%	https://www.dorsetforyou.gov.uk	9	285	15 January 2016	https://www.dorsetforyo	88
E07000038	North East Derbyshire	276	270 - 310	46%	http://www.ne-derbyshire.gov.uk	127	No adopted plan number	-	-	-
E06000012	North East Lincolnshire	236	702	21%	https://www.nelincs.gov.uk/wp-c	-	No adopted plan number	-	-	-
E07000099	North Hertfordshire	996	690	42%	http://www.stevnage.gov.uk/ccr	4	No adopted plan number	-	-	-
E07000139	North Kesteven	See Central Lincolnshire	Local assessment of need not available	0%	-	-	See Central Lincolnshire	24 April 2017	https://www.n-kesteven.	13
E06000013	North Lincolnshire	419	711	2%	http://www.northlincs.gov.uk/Eas	167	754	28 June 2011	http://www.planning.nor	69
E07000147	North Norfolk	511	409	28%	https://www.south-norfolk.gov.uk	11	400	24 September 2008	https://www.north-norfo	29
E06000024	North Somerset	1,305	Local assessment of need not available	53%	-	-	1,049	10 January 2017	http://www.n-somerset.g	65
E08000022	North Tyneside	824	790	20%	http://www.northynteside.gov.uk/	-	790	01 July 2017	http://www.northyntesid	76
E07000218	North Warwickshire	169	237	62%	https://www.northwarks.gov.uk/d	128	203	01 October 2014	https://www.northwarks.	25
E07000134	North West Leicestershire	360	270 - 330	2%	http://www.charnwood.gov.uk/file	186	No adopted plan number	-	-	-
E07000154	Northampton	1,321	1,431	1%	http://www.westnorthamptonshi	-	1,048	15 December 2014	http://www.westnortham	227
E06000057	Northumberland	707	830	44%	http://www.northumberland.gov.i	11	No adopted plan number	-	-	-
E07000148	Norwich	602	724	1%	https://www.south-norfolk.gov.uk	11	477	10 January 2014	https://www.norwich.g	41
E06000018	Nottingham	1,010	Local assessment of need not available	10%	-	-	1,009	17 September 2014	http://www.nottinghamc	44
E07000219	Nuneaton and Bedworth	420	502	46%	https://www.nuneatonandbedwo	-	373	01 June 2006	https://www.nuneatonr	11
E07000135	Oadby and Wigston	0	148	0%	http://www.charnwood.gov.uk/file	186	90	28 September 2010	http://www.oadby-wigst	35
E08000004	* Oldham	716	780	65%	https://gmsf-consult.objective.co	187	289	09 November 2011	https://www.oldham.g	55
E07000178	Oxford	746	1200 - 1600	29%	http://www.google.co.uk/ur?sa=i	6	400	14 March 2011	https://www.oxford.g	107
E07000122	Pendle	165	250 - 340	36%	http://www.pendle.gov.uk/down	44	298	17 December 2015	http://www.pendle.g	124
E06000031	Peterborough	942	981	2%	https://www.peterborough.gov.u	9	1,500	23 February 2011	https://www.peterboro	39
E06000026	Plymouth	647	911	2%	https://www.plymouth.gov.uk/site	23	1,150	01 April 2007	https://www.plymouth.g	91
E06000029	Poole	732	710	31%	https://www.dorsetforyou.gov.uk	9	500	19 February 2009	http://www.poole.g	55
E06000044	Portsmouth	835	740	4%	https://www.portsmouth.gov.uk/c	-	584	24 January 2012	https://www.portsmouth	-
E07000123	Preston	225	615	14%	http://www.preston.gov.uk/GetA	84	507	05 July 2012	http://www.preston.g	71
E07000051	Purbeck	738	238	7%	https://www.dorsetforyou.gov.uk	9	120	13 November 2012	https://www.dorsetforyo	23
E06000038	Reading	611	699	0%	http://www.reading.gov.uk/media	369	533	31 January 2008	http://www.reading.g	50
E09000028	Redbridge	2,981	2,286	37%	https://www.redbridge.gov.uk/me	11	905	01 March 2008	https://www.redbridg	26
E06000003	Redcar & Cleveland	142	132	26%	http://www.redcar-cleveland.gov	-	282	01 July 2007	http://www.redcar-clev	47
E07000236	Redditch	353	337	35%	http://www.redditchbc.gov.uk/me	1	337	30 January 2017	http://www.redditchbc	22
E07000211	Reigate & Banstead	644	600 - 640	69%	http://www.reigate-banstead.g	9	460	01 July 2014	http://www.reigate-ban	65
E07000124	Ribble Valley	172	280	69%	https://www.ribblevalley.gov.uk/d	13	280	16 December 2014	https://www.ribbleval	56
E09000027	Richmond Upon Thames	1,709	1,047	27%	http://www2.richmond.gov.uk/do	-	270	21 April 2009	http://www2.richmond.g	-
E07000166	Richmondshire	14	180	59%	http://www.richmondshire.gov.uk	14	180	09 December 2014	http://www.richmondsh	26
E08000005	Rochdale	514	460	63%	https://gmsf-consult.objective.co	187	460	19 October 2016	http://www.rochdale.g	65
E07000075	Rochford	362	331	76%	https://www.rochford.gov.uk/sites	4	250	13 December 2011	https://www.rochford	42
E07000125	Rossendale	212	265	31%	https://www.rossendale.gov.uk/d	118	247	08 November 2011	https://www.rossendale.	67
E07000064	Rother	469	363	90%	http://www.rother.gov.uk/CHttp	39	335	29 September 2014	http://www.rother.g	37
E08000018	Rotherham	593	900	71%	http://www.rotherham.gov.uk/inf	18	958	10 September 2014	http://www.rotherham.g	70
E07000220	Rugby	514	480	58%	https://www.rugby.gov.uk/down	128	540	01 June 2011	https://www.rugby.g	9
E07000212	Runnymede	557	466 - 535	79%	https://www.runnymede.gov.uk/C	177	No adopted plan number	-	-	-
E07000176	Rushcliffe	600	774	40%	https://www.rushcliffe.gov.uk/med	28	774	22 December 2014	http://www.rushcliffe.g	24
E07000092	Rushmoor	294	436	12%	http://www.rushmoor.gov.uk/CHI	8	374	20 September 2011	http://www.rushmoor.g	27
E06000017	Rutland	128	159	6%	https://www.peterborough.gov.u	9	150	11 July 2011	https://www.rutland.g	35
E07000167	Ryedale	187	195 - 213	49%	https://www.ryedaleplan.org.uk/a	7	200	05 September 2013	http://www.ryedaleplan	51
E08000006	Salford	1,385	1,502	35%	https://gmsf-consult.objective.co	187	No adopted plan number	-	-	-
E08000028	Sandwell	1,432	1357 - 1450	10%	http://blackcountrycostrategy.d	67	1,074	01 February 2011	http://blackcountryco	64
E07000168	Scarborough	162	175 - 579	74%	https://www.scarborough.gov.uk	10	450	03 July 2017	https://www.scarborou	56
E07000188	Sedgemoor	754	644	22%	https://www.tauntondeane.gov.u	2	505	18 October 2011	http://www.sedgemoor.g	27
E08000014	* Sefton	654	710 - 1290	54%	https://www.sefton.gov.uk/media	77	640	20 April 2017	https://www.sefton.g	40
E07000169	Selby	371	450	33%	http://www.selby.gov.uk/sites/def	47	450	22 October 2013	http://www.selby.g	54
E07000111	Sevenoaks	698	620	94%	https://www.sevenoaks.gov.uk/d	171	165	01 February 2011	https://www.sevenoaks	22
E08000019	* Sheffield	2,093	1,748	63%	https://www.sheffield.gov.uk/con	8	1,352	04 March 2009	https://www.sheffiel	60
E07000112	Shepway	490	633	50%	https://www.shepway.gov.uk/me	61	350	01 September 2013	https://www.shepway.g	42
E06000051	Shropshire	1,270	2,518	33%	http://shropshire.gov.uk/media/8	-	1,375	01 February 2011	http://shropshire.g	26
E06000039	Slough	913	927	27%	http://www.slough.gov.uk/down	369	313	01 December 2008	http://www.slough.g	26
E08000029	Solihull	732	689	67%	http://www.solihull.gov.uk/Porta	52	No adopted plan number	-	-	-
E07000006	South Buckinghamshire	432	335 - 340	87%	https://www.aylesburyaleo.d	11	125	01 February 2011	http://www.southbucks	27
E07000012	* South Cambridgeshire	1,182	967	26%	https://www.scams.gov.uk/sites	36	1,176	25 January 2007	https://www.scams.g	11

E0700039	South Derbyshire	589	576	8%	http://www.south-derbys.gov.uk/	161	742	13 June 2016	http://www.south-derbys	17
E0600025	South Gloucestershire	1,474	Local assessment of need not available	61%	-	-	1,350	11 December 2013	http://www.southglos.gov	86
E0700044	South Hams	354	196	55%	http://old.southhams.gov.uk/CHT	-	557	01 December 2006	http://old.southhams.gov	19
E07000140	South Holland	416	445	3%	https://www.peterborough.gov.uk	9	No adopted plan number	-	-	-
E07000141	South Kesteven	783	624	1%	https://www.peterborough.gov.uk	9	680	05 July 2010	http://www.southkesteve	50
E07000031	South Lakeland	211	290	75%	http://applications.southlakeland.	111	400	20 October 2010	https://www.southlakela	76
E07000149	South Norfolk	922	763	8%	https://www.south-norfolk.gov.uk	-	929	22 March 2011	https://www.south-norfo	-
E07000155	South Northamptonshire	491	400	2%	http://www.westnorthamptonshir	100	351	15 December 2014	http://www.westnortham	35
E07000179	South Oxfordshire	617	725 - 825	65%	http://www.google.co.uk/lur/?sa=i	6	547	01 December 2012	http://www.southoxon.g	49
E07000126	* South Ribble	228	859	67%	http://www.southribble.gov.uk/sit	208	417	18 July 2012	http://www.preston.gov.i	71
E07000189	South Somerset	734	547 - 607	7%	https://www.tauntondeane.gov.u	2	725	05 March 2015	https://www.southsomer	38
E07000196	South Staffordshire	245	259 - 270	79%	https://www.sstaffs.gov.uk/doc/1	67	175	11 December 2012	https://www.sstaffs.gov.i	107
E08000023	* South Tyneside	365	318	38%	https://www.southtyneside.gov.u	1	168	28 June 2007	https://www.southtynes	24
E06000045	Southampton	942	1,115	2%	https://www.southampton.gov.uk	-	815	20 January 2010	https://www.southamptc	36
E06000033	Southend-on-Sea	1,114	1,072	15%	https://www.rochford.gov.uk/site	4	325	13 December 2007	http://www.southend.gov	89
E09000028	Southwark	3,089	1472 - 1824	0%	https://www.lewisham.gov.uk/my	106 & 195	1,630	06 April 2011	http://www.2.southwark.	78
E07000213	Spelthorne	593	553 - 757	65%	https://www.watford.gov.uk/down	177	166	26 February 2009	https://www.spelthorne.g	27
E07000240	St Albans	913	639	81%	https://www.watford.gov.uk/down	187	No adopted plan number	-	-	-
E07000204	St Edmundsbury	446	550	7%	https://www.westsuffolk.gov.uk/p	2	546	14 December 2010	https://www.westsuffolk	30
E08000013	St Helens	504	451	65%	https://www.sthelens.gov.uk/mec	186	570	31 October 2012	https://www.sthelens.g	104
E07000197	Stafford	424	500	21%	http://www.staffordbc.gov.uk/live	55 & 72	500	01 June 2014	http://www.staffordbc.g	21
E07000198	Staffordshire Moorlands	193	235 - 330	67%	https://www.staffsmoorlands.gov	-	300	01 March 2014	https://www.staffsmoor	70
E07000243	Stevenson	443	380	11%	http://www.stevenage.gov.uk/oc	4	No adopted plan number	-	-	-
E08000007	Stockport	1,078	1,011	46%	http://old.stockport.gov.uk/pdf/pl	-	495	17 March 2011	http://old.stockport.gov.i	-
E06000004	Stockton-on-Tees	533	600	1%	https://www.stockton.gov.uk/mec	83	557	24 March 2010	https://www.stockton.g	37
E06000021	* Stoke on Trent	487	804	19%	https://www.stoke.gov.uk/directo	51	570	01 October 2009	https://www.newcastle-s	43
E07000221	Stratford on Avon	588	724	34%	https://www.stratford.gov.uk/lem	-	730	01 July 2016	https://www.stratford.g	-
E07000082	Stroud	635	448	52%	- https://www.stroud.gov.uk/med	101	456	19 November 2015	https://www.stroud.gov.i	23
E07000205	Suffolk Coastal	495	460	33%	http://www.babergh.gov.uk/asset	80	465	05 July 2013	http://www.eastsuffolk.g	28
E08000024	Sunderland	593	768	25%	http://www.sunderland.gov.uk/Ci	125	No adopted plan number	-	-	-
E07000214	Surrey Heath	352	382	60%	http://www.surreyheath.gov.uk/si	8	191	01 February 2012	http://www.surreyheath.i	26
E09000029	* Sutton	1,774	1,100	14%	https://drive.google.com/file/d/0B	74	345	01 December 2009	https://www.sutton.gov.i	28
E07000113	Swale	1,054	776	35%	http://services.swale.gov.uk/mee	-	776	26 July 2017	http://services.swale.g	41
E06000030	Swindon	1,021	1,466	28%	https://www.swindon.gov.uk/dow	25	1,467	26 March 2015	https://www.swindon.g	21
E08000008	Tameside	648	679	49%	https://gmsf-consult.objective.co	187	No adopted plan number	-	-	-
E07000199	Tamworth	159	250	8%	http://www.tamworth.gov.uk/sites	-	177	01 February 2016	http://www.tamworth.g	-
E07000215	Tandridge	645	470	94%	http://www.tandridge.gov.uk/P/ort	8	125	01 October 2008	http://www.tandridge.g	20
E07000190	Taunton Deane	627	474 - 512	22%	https://www.tauntondeane.gov.u	2	850	11 September 2012	https://www.tauntondea	12
E07000045	Teignbridge	756	619 - 747	41%	http://eastdevon.gov.uk/media/9f	108	620	06 May 2014	https://www.teignbridge	18
E06000020	* Telford and Wrekin	555	497	2%	http://www.telford.gov.uk/down	72	No adopted plan number	-	-	-
E07000076	Tending	749	550	6%	http://www.brantree.gov.uk/down	74	550	03 November 2016	https://tdcdemocracy.ter	1
E07000093	Test Valley	569	450 - 590	14%	http://www.testvalley.gov.uk/pla	-	588	01 January 2016	http://www.testvalley.g	52
E07000083	Tewkesbury	601	495	51%	https://www.tewkesbury.gov.uk/is	-	No adopted plan number	-	-	-
E07000114	Thanet	1,063	857	1%	https://www.thanet.gov.uk/media	6	No adopted plan number	-	-	-
E07000102	Three Rivers	610	514	76%	https://www.watford.gov.uk/down	187	180	17 October 2011	http://www.threerivers.g	32
E06000034	Thurrock	1,158	1,381	72%	https://www.rochford.gov.uk/site	4	925	21 December 2011	https://www.thurrock.g	36
E07000115	Tonbridge and Malling	859	696	77%	https://www.tmbc.gov.uk/ data	1	425	01 September 2007	https://www.tmbc.gov.uk	42
E06000027	Torbay	1,049	1,049	12%	http://www.torbay.gov.uk/media/	11	495	10 December 2015	http://www.torbay.gov.uk	46
E07000046	* Torridge	444	393	10%	http://www.torridge.gov.uk/CHt	246	No adopted plan number	-	-	-
E09000030	Tower Hamlets	4,873	2,428	0%	https://www.lowerhamlets.gov.uk	-	2,885	15 September 2010	http://www.towerhamlets	45
E08000009	Trafford	1,319	1,296	38%	https://gmsf-consult.objective.co	187	578	25 January 2012	http://www.trafford.g	85
E07000116	Tunbridge Wells	692	648	75%	http://www.tunbridgewells.gov.uk	172	300	01 June 2010	http://www.tunbridgewel	46
E07000077	Utlesford	740	606	7%	https://www.utlesford.gov.uk/loc	-	No adopted plan number	-	-	-
E07000180	Vale of White Horse	689	1,028	38%	http://www.whitehorsedc.gov.uk/	181	1,028	01 December 2016	http://www.whitehorsed	44
E08000036	Wakefield	1,033	1,524	71%	http://www.wakefield.gov.uk/Doc	-	1,600	15 April 2009	http://www.wakefield.g	-
E08000030	Walsall	881	818 - 842	38%	http://blackcountrycorestrategy.d	67	629	01 February 2011	http://blackcountrycores	64
E09000031	Waltham Forest	2,416	2,017	23%	https://www.newham.gov.uk/Doc	15	760	01 March 2012	https://static.walthamfor	41
E09000032	Wandsworth	2,414	738 - 1238	3%	http://www.wandsworth.gov.uk/d	50	1,724	09 March 2016	http://www.wandsworth.	46
E06000007	Warrington	Plan number not adopted.	955	63%	https://www.warrington.gov.uk/d	186	Plan number not adopted.	21 July 2014	https://www.warrington.g	68
E07000222	Warwick	623	600	73%	https://www.warwickdc.gov.uk/d	128	No adopted plan number	-	-	-
E07000103	Watford	364	577	19%	https://www.watford.gov.uk/down	187	260	30 January 2013	https://www.watford.g	68
E07000206	Waveney	350	374	22%	http://www.babergh.gov.uk/asset	124	290	29 January 2009	http://www.eastsuffolk.g	41
E07000216	Waverley	538	519	64%	http://www.guildford.gov.uk/new	169	No adopted plan number	-	-	-
E07000065	Wealden	630	625 - 1233	65%	http://www.wealden.gov.uk/nmsr	172	450	01 February 2013	http://www.wealden.g	22
E07000156	Wellingborough	340	350	3%	http://www.nniju.org.uk/docs/20	18	350	14 July 2016	http://www.nniju.org.uk	132
E07000241	Welwyn Hatfield	877	800	79%	http://www.welhat.gov.uk/CHtP	88	No adopted plan number	-	-	-
E06000037	West Berkshire	545	665	75%	http://info.westberks.gov.uk/CHt	-	525	01 May 2017	http://info.westberks.g	5
E07000047	West Devon	318	258	53%	http://old.westdevon.gov.uk/CHt	-	220	01 April 2011	Not available online	-
E07000052	West Dorset, Weymouth & Portland	ee West Dorset, Weymouth & Portlar	605	71%	https://www.dorsetforoy.gov.uk	26	West Dorset, Weymouth & Pc	22 October 2015	https://www.dorsetforoy	58
E07000127	West Lancashire	212	335	90%	https://www.dorsetforoy.gov.uk	26	775	23 October 2015	https://www.dorsetforoy	58
E07000142	West Lindsey	See Central Lincolnshire	Local assessment of need not available	11%	http://www.westlancs.gov.uk/m	42	324	16 October 2013	https://www.westlancs.g	39
E07000181	West Oxfordshire	601	635 - 685	37%	-	-	See Central Lincolnshire	24 April 2017	https://www.n-kesteven.	13
E07000191	West Somerset	Affordability data not available	120	73%	http://www.google.co.uk/lur/?sa=i	6	450	16 June 2008	https://www.westoxon.g	75
E09000033	Westminster	1,495	740	0%	https://www.westsomersetonline	165	145	23 November 2006	https://www.westsomers	23
E07000053	Weymouth and Portland	ee West Dorset, Weymouth & Portlar	170	30%	http://transact.westminster.gov.u	17 & 35	1,068	09 November 2016	https://www.westminster	86
E08000010	Wigan	992	975	57%	https://www.dorsetforoy.gov.uk	26	West Dorset, Weymouth & Pc	15 October 2015	https://www.dorsetforoy	58
E06000054	Wiltshire	2,227	Local assessment of need not available	53%	https://gmsf-consult.objective.co	187	1,000	11 September 2013	https://www.wigan.gov.i	68
E07000094	Winchester	653	550	41%	http://www.wiltshire.gov.uk/	55	2,100	20 January 2015	http://www.wiltshire.g	29
E06000040	Windsor & Maidenhead	778	712	83%	http://www.windsor.gov.uk/sales/d	132	No adopted plan number	-	-	-
E08000015	* Woking	803	875 - 1235	47%	http://www.woking.gov.uk/	169	292	25 October 2012	http://www.woking2027.	63
E07000217	Woking	409	517	63%	https://www.woking.gov.uk/pla	169	292	25 October 2012	http://www.woking2027.	63
E06000041	Wokingham	876	856	16%	www.wokingham.gov.uk/EasySil	369	662	29 January 2010	http://www.wokingham.g	64
E08000031	* Wolverhampton	730	710 - 706	12%	http://blackcountrycorestrategy.d	67	671	01 February 2011	http://blackcountrycores	64

E07000237	* Worcester	396	410	7%	http://www.swdevelopmentplan.c	25	283	01 February 2016	http://www.swdevelopm	33
E07000229	Worthing	865	636	25%	https://www.adur-worthing.gov.u	110	200	12 April 2011	https://www.adur-worthi	86
E07000238	Wychavon	509	415	21%	https://www.wychavon.gov.uk/dc	5	442	25 February 2016	www.swdevelopmentpla	55
E07000007	Wycombe	792	641	77%	https://www.aylesburyvaledc.gov	11	403	07 July 2008	https://www.wycombe.g	48
E07000128	Wyre	313	400 - 479	23%	http://www.wyre.gov.uk/downloa	69	No adopted plan number	-	-	-
E07000239	Wyre Forest	246	300	62%	http://www.wyreforestdc.gov.uk/r	28	200	01 December 2010	http://www.swdevelopm	19
E06000014	York	1,070	867	82%	http://democracy.york.gov.uk/doc	205	No adopted plan number	-	-	-

Notes

- 1: Local plan numbers are for the local planning authorities that relate to the local authority areas listed, but exclude the plans of National Parks, the Broads Authority and Development Corporations with plan-making powers.
- 2: Central Bedfordshire adopted plan number refers to Mid Bedfordshire plan prior to the formation of Central Bedfordshire, and as such covers a smaller geographic area.
- 3: Solihull's Local Plan number is not treated as adopted following a High Court judgement.

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix IX

1. Home (<https://www.gov.uk/>)
2. Government (<https://www.gov.uk/government/all>)
3. National security (<https://www.gov.uk/government/national-security>)

Press release

PM chairs inaugural meeting of the Housing Implementation Taskforce

Prime Minister Theresa May today chaired the inaugural meeting of the Housing Implementation Taskforce.

Published 5 February 2018

From:

Prime Minister's Office, 10 Downing Street (<https://www.gov.uk/government/organisations/prime-ministers-office-10-downing-street>) and The Rt Hon Theresa May MP (<https://www.gov.uk/government/people/theresa-may>)



Prime Minister Theresa May today chaired the inaugural meeting of the Housing Implementation Taskforce – a cross-government working group attended by, among others, the Chancellor, the Housing Secretary, the Transport Secretary and several other Cabinet Ministers, to discuss the progress Government is making and further actions needed to increase housing supply.

A Downing Street spokesperson said:

Today the Prime Minister chaired the first meeting of the Housing Implementation Taskforce at Downing Street.

She stressed the integral role all Government departments have in helping to fix the broken housing market and deliver 300,000 additional homes by the mid-2020s.

The taskforce discussed the steps Government has already taken, including further investment at the Budget, planning reform, releasing land faster, the Housing White Paper and building more affordable housing. They emphasised the key role of Homes England in driving forward change, and also focused on the supply of new housing, public sector land sales, land banking, house-building skills and building the infrastructure needed for new housing developments.

The Prime Minister reiterated that a step change was needed right across Government and that all departments needed to think creatively about how they can contribute to building the homes the country needs.

Ministers who attended the meeting included:

- Rt Hon Philip Hammond MP, Chancellor of the Exchequer
- Rt Hon Sajid Javid MP, Secretary of State for Housing, Communities and Local Government
- Rt Hon Greg Clark MP, Secretary of State for Business, Energy and Industrial Strategy
- Rt Hon David Lidington CBE MP, Minister for the Cabinet Office and Chancellor of the Duchy of Lancaster
- Rt Hon Damian Hinds, Secretary of State for Education
- Rt Hon Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs
- Rt Hon Chris Grayling, Secretary of State for Transport
- Rt Hon Tobias Ellwood MP, Parliamentary Under Secretary of State at the Ministry of Defence
- Baroness Buscombe, Parliamentary Under Secretary of State for the Department for Work and Pensions
- Oliver Dowden CBE MP, Parliamentary Secretary at the Cabinet

Published 5 February 2018

Related content

National security (<https://www.gov.uk/government/national-security>)

- NATO Summit Wales 2014: operational information for media (<https://www.gov.uk/guidance/nato-summit-wales-2014-operational-information-for-media>)
- Surveillance and counter-terrorism (<https://www.gov.uk/guidance/surveillance-and-counter-terrorism>)
- UK forces: operations in Afghanistan (<https://www.gov.uk/guidance/uk-forces-operations-in-afghanistan>)

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix X



The Planning Inspectorate

Report to North Somerset Council

by Wendy J Burden BA(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Date 16 February 2018

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the North Somerset Sites and Policies Plan Part 2: Site Allocations Plan 2006-2026

The Plan was submitted for examination on 24 February 2017

The examination hearings were held between 16 and 18 May 2017

File Ref: PINS/D0121/429/12

Abbreviations used in this report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
DCLG	Department for Communities and Local Government
DtC	Duty to Co-operate
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
JSP	Joint Spatial Plan
LDS	Local Development Scheme
LGS	Local Green Space
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
NSC	North Somerset Council
NSRLP	North Somerset Replacement Local Plan
OAN	Objectively assessed need
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SAP	Site Allocations Plan
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SRN	Strategic Road Network
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the North Somerset Site Allocations Plan provides an appropriate basis for the planning of North Somerset, provided that a number of main modifications [MMs] are made to it. North Somerset Council (NSC) has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period from 18 September until 30 October 2017. In some cases I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Text relating to individual residential allocations within Schedule 1 is amended in response to issues raised by the Environment Agency, the Internal Drainage Board, Historic England, Natural England and National Grid.
- New residential allocations are added to Schedule 1 to provide land for some 821 dwellings.
- Schedule 1 is updated through the deletion of sites on which development has been completed and the addition of sites which have received planning permission.
- The allocations for employment land are amended with the overall total area changed and the deletion of Weston Gateway from Schedule 2.
- Policies SA4, SA5, and SA6 are deleted and a new policy SA4 is inserted to deal with the safeguarding of sites allocated for or in use for B1-B8 purposes in accord with national policy.
- Schedule 3 "Safeguarded employment sites" is deleted.
- Two sites in Schedule 4 for Local Green Space are deleted.
- Submitted Policy SA8 (new Policy SA6) is amended to deal with development affecting undesignated green space.
- In Schedule 5 a number of sites are deleted, including all locations identified as Strategic Open Space.

Introduction

1. This report contains my assessment of the North Somerset Site Allocations Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The North Somerset Site Allocations Plan (SAP) submitted in February 2017 is the basis for my examination. It is the same document as was published for consultation in October 2016.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act NSC requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, NSC prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule [ED/45] was subject to public consultation for six weeks from 18 September to 30 October 2017. I have taken account of the consultation responses in coming to my conclusions in this report. I have made amendments to MM2 which have been published and on which I sought the views of interested parties. I have made some further amendments to the detailed wording of MM2 in the light of the comments received. No amendment significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans as set out in ED42.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.

7. These further changes to the policies map were published for consultation alongside the MMs [ED45a].
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, NSC will need to update the adopted policies map to include all the changes proposed in ED45a and the further changes published alongside the MMs.

Assessment of Duty to Co-operate

9. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The Council has submitted a Duty to Co-operate Statement [ED/43].
10. NSC is part of the West of England Partnership (WEP) established in 2005 together with the other unitary authorities of Bristol, South Gloucestershire, and Bath and North East Somerset. Throughout the preparation of strategic plans, the WEP has acted as the focus for cross-boundary working on spatial planning, transport, housing, waste and economic development. The WEP has now been replaced by the West of England Local Enterprise Partnership (LEP). The LEP brings the authorities together with local businesses and education to provide the focus for continued joint working to support sustainable economic growth locally.
11. The proposals contained within the Site Allocations Plan are locally specific to NSC and have not required joint working. The plan allocates sites that contribute to delivering the policies of the North Somerset Core Strategy (CS), particularly the housing requirement and related needs for employment, community facilities and open space. It does not allocate sites whose development will have a significant effect on neighbouring areas. Policies and proposals for the extent and distribution of development and for transport infrastructure have already been adopted through the CS and the Sites and Policies Plan Part 1.
12. Cross-boundary issues relating to European sites are addressed in the Habitats Regulations Assessment (HRA). The HRA considers the impact on European sites, some of which are cross-boundary, but concludes that with the mitigation measures identified in the HRA there would not be likely significant effects on European sites.
13. All adjoining authorities have been consulted at each consultation stage in the production of the SAP in accordance with the Council's Statement of Community Involvement. No cross-boundary issues have been raised.
14. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background

15. The purpose of the SAP is to identify the detailed allocations required to deliver the North Somerset Core Strategy [CS]. It is for the SAP to allocate the sites required for residential development and for employment uses, and to include designations to safeguard or protect areas of Local Green Space, sites for community use and strategic gaps.
16. The CS Policy CS13 as approved by the Secretary of State in September 2015, sets out the overall minimum requirement for new residential development of some 20,985 dwellings in the period 2006- 2026. The broad indication of where the residential development requirement should be distributed across the hierarchy of settlements within North Somerset is set out in Policy CS14.
17. It is for the SAP *"to identify the new residential allocations necessary to deliver the CS requirement, taking into account the need to supply deliverable sites to ensure the Council can maintain a 5 year housing land supply"* [ID1; SD18].
18. Core Strategy Policy CS20 sets out the level of provision and broad distribution of economic development, and Policy CS19 deals with strategic gaps.
19. The CS commits NSC to a review of the CS by the end of 2018 to take account of the wider housing market area. NSC is working as one of the four West of England authorities together with South Gloucestershire, Bath and North East Somerset and Bristol City Councils. The four Councils are together producing a Joint Spatial Plan (JSP) to cover the period from 2016 to 2036. The Plan will identify the strategic priorities for the homes and jobs needed within the area. It is intended to submit the JSP for examination in March 2018 and that will provide the strategic guidance for the review and roll forward of the local plans for each of those areas. A new NSC local plan is being prepared in parallel with the emerging JSP to cover the period 2018-2036, and is intended for submission in Spring 2019. The strategic spatial context for the NSC local plan will be identified through the JSP.
20. In my examination of the SAP, I take into account the process of review which is currently being undertaken. It is most likely that the CS and the SAP will be largely superseded within the first two to three years after adoption of the SAP. In the circumstances where the SAP would have a very short lifespan following adoption, I take into account the potential for proposals in the SAP to be the subject of an early review. This is pertinent to the consideration of the housing land supply, to the designation of strategic gaps and local green space, and the definition of settlement boundaries.
21. These matters should most appropriately be revisited in the context of the requirement for housing and employment land which is being established through the JSP. The JSP will establish the new strategic policies for North Somerset. Any changes to the boundaries of strategic gaps, the designation of local green space or the definition of settlement boundaries required to implement those strategic policies should then be made through the emerging new Local Plan. For the SAP, I set out my recommendations in respect of the proposals for housing land supply, the policy in relation to the safeguarding of

employment sites, and the approach to be taken to strategic gaps and local green space in the report below.

Main Issues

22. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified seven main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Is the SAP based on a sound process of sustainability appraisal (SA) which includes the testing of reasonable alternatives in the allocation of residential sites? Are the residential site allocations policies sound?

The Objectives

23. The SAP must conform with the CS and has the specific purpose of identifying the sites and designations required to deliver the CS. It is not the purpose of the SAP to reconsider the objectives of the CS, or to review its strategy and policies. Nevertheless, the Strategic Environmental Assessment (SEA) Regulations¹ require the SAP to be the subject of an independent SA. The process of SA includes the identification of SEA objectives for the SA to test. SEA objectives are used to help show whether the objectives of the plan are beneficial for the environment, to compare the environmental effects of alternatives, or to suggest improvements.
24. For the scoping report for the SA [SD6] the framework objectives were reviewed and amended from those considered for earlier plans relating to the CS. The objective which related to the promotion of housing development has been deleted from the framework, and no clear explanation has been provided by NSC for abandoning that objective. In contrast, the objective to deliver a reasonable quantum of employment opportunities has been retained. Since the delivery of the housing requirement in the CS is fundamental to the purpose of the SAP, I am concerned that the recognition of this important role of the SAP has not been included within the SA framework objectives.
25. Nevertheless, although there is no housing objective identified within the scoping report for the SA, the objectives of the SAP flow from those in the CS. The first of the ten priority objectives of the CS is "*to deliver sustainable housing development across North Somerset to meet housing needs through the provision of a minimum of 20,985 new homes by 2026*". That priority objective flows through into the SAP for which the purpose is to identify the housing allocations which will deliver the requirement for 20,985 dwellings in the period 2006- 2026. The SAP does not seek to avoid that responsibility, and the selection and evaluation of the housing sites to fulfil that purpose is a

¹ Environmental Assessment of Plans and Programmes Regulations 2004 – S.I. 2004 No. 1633

fundamental part of the SA work which has been carried out in the preparation of the SAP.

26. The SA objectives in the scoping report have been used to help determine whether sites should be allocated for residential use or whether an alternative option should be considered. I deal with the adequacy of the work which has been carried out in the evaluation of housing sites, and their deliverability later in the report. However, the lack of a specific housing objective for the SA has not interfered with the actual promotion of housing development through the SAP in accordance with the requirement of the CS, and its testing through the SA process. Furthermore, the deliverability of the allocations in the SAP have been rigorously tested through the examination process.
27. Since the process of SEA has been augmented through the examination of the SAP, I am satisfied that the promotion of residential allocations and their deliverability has been appropriately tested in the SAP. The lack of a specific housing delivery objective in the scoping report has not therefore resulted in any inadequacy in the overall SEA of the SAP.

Assessment of reasonable alternatives

28. The SA should identify, describe and evaluate the likely significant effects of implementing the plan and reasonable alternatives. Reasonable alternatives are the different options considered in developing the policies and must be sufficiently distinct to enable comparisons to be made of their different sustainability implications, be realistic and deliverable.
29. As a plan which must conform with the CS, there is constraint on the alternatives which may be considered for the SAP, since it is not for the SAP to consider any option which would not be in accord with the CS. The SEA Directive requires an assessment of the likely significant effects of implementing the plan compared with "*reasonable alternatives taking into account the objectives and the geographical scope of the plan*". Having regard to the purpose of the SAP, to identify the allocations required to deliver the CS, I find it satisfactory that the approach taken is to assess all the options for site allocations alongside the reasonable alternatives of not implementing the proposed option. These options are identified at para 4.6 of the SA and although very limited in scope, I find them to be adequate in the particular circumstances of the SAP.

Assessment of residential site allocations

30. The options for allocation of sites for residential development, employment uses and Local Green Space (LGS) have each been assessed according to relevant SA sub-objectives.
31. For the residential allocations, the assessment started with a 'call for sites' in 2014, followed by an initial sift to take out those sites subject to significant identified constraints such as non-previously developed Green Belt sites, sites within the Mendip Hills AONB and those sites wholly within Flood Zone 3b [SD7 para 4.8]. Some 214 sites were then assessed against selected SA framework objectives, in accordance with the Red, Amber, Green (RAG) rating system, using defined assessment criteria for each RAG rating. However, the scores achieved in the RAG rating were not the determining factor as to

whether a site should be allocated in the SAP, and the assessment in SD8 is not intended to be the definitive guide as to the most appropriate residential allocations.

32. The residential site assessment was carried out for each town, village and countryside site location with the RAG rating results detailed in the matrix in SD8. Sites with less favourable scores were considered further to assess whether potential difficulties could be avoided or mitigated. As a result some lower scoring sites have been allocated for residential development in the SAP with some sites which score more highly in the matrix not being allocated. In explanation for this apparent discrepancy, the Council indicates that in addition to the assessment against the SA sub-objectives, other factors were taken into account such as compatibility with policy, physical limitations and barriers to delivery. However the work undertaken to introduce the factors not included in the RAG criteria is not clearly set out in the evidence base to the submitted SAP.
33. The apparent inconsistency between the assessment matrix and the allocated sites appears greater when the review of the sustainability and settlement hierarchy of rural settlements [SD9] is taken into account. For the nine service villages required in the CS to deliver a minimum of 2,100 dwellings by 2026, there is little correlation between the RAG ratings of the settlement in terms of sustainability and the level of growth allocated to the settlement in the SAP.
34. The CS does not differentiate between the nine service villages which in strategic terms are at the same level within the settlement hierarchy. There is therefore no policy requirement for a service village which scores more highly on the RAG ratings to accommodate more development than a lower scoring village. Indeed, it is stated in SD9 that other technical studies would be used to determine the appropriate amount and location of new development and to ensure that it is adequately supported by infrastructure and services.
35. I find it to be reasonable that although a settlement may be judged to be relatively sustainable, there may not be suitable sites within that settlement to accommodate a particular number or percentage of the district housing requirement.
36. Some of the original site selection evidence lacked clarity but further information was provided at the hearings and additional work on site selection has been carried out as a result of my request to the Council to identify more deliverable sites for allocation in the SAP[ID4]. I deal with this matter under Issue 2. With the discussion at the hearings which provided some clarification of the selection process, and the additional work which has now been carried out, [*Site Allocations Plan: Further assessment of residential sites*] I am satisfied that there has been an adequate testing of reasonable alternatives and SA of the residential site selection for the SAP.
37. A number of the residential allocations in Schedule 1, including those now put forward as modifications, are subject to objections raised during the consultation on the SAP, enlarged upon at the hearings and in the consultation on the modifications. I have considered these objections against the tests of soundness in the NPPF.

38. Issues raised by the Environment Agency have been dealt with through modifications **MM4, MM22, MM23** within the text to Schedule 1. The modifications will ensure that flood risks are properly taken into account in accordance with national policy as these allocations are brought forward. The Internal Drainage Board had concerns relating to surface water management and flooding and these are addressed through **MM5** and **MM6**. With these modifications in place I am satisfied that the allocations accord with national policy in respect of the management of flood risks.
39. Historic England has not withdrawn its objection to proposals for Birnbeck Pier, but **MM7** introduces text to ensure that the importance of the heritage asset is recognised and taken fully into account in accordance with the requirements of the NPPF. Historic England would in addition be consulted on any development proposal.
40. **MM7** and **MM28** introduce text to address concerns raised by Natural England. I am satisfied that with these modifications in place, the allocations will comply with the requirement in NPPF para 109 to contribute to and enhance the natural environment.
41. Through **MM17** the allocation west of Engine Lane takes account of the proposals by National Grid for the site, and also identifies the location of the site within Coal Authority Low Risk Development Area. The modification provides clarity as to the constraints to development of this site.
42. With the modifications in place, I consider the proposed residential allocations, including those introduced through modifications to the SAP and to which I refer later in the report, to be soundly based. There is no basis on which I should seek the removal of any of the residential allocations on the grounds that its inclusion in the SAP would make the plan unsound. I include in this finding the site at Old Mill Road allocated in Schedule 1 and subject to MM23 referred to above. I make further reference to this site under Issue 5 (Employment) below.

Designation of strategic gaps

43. In the CS, Policy CS19 states that the Council will protect strategic gaps to help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements. Broad locations for the strategic gaps are identified in the CS, which states that their boundaries are to be defined in the Sites and Policies Development Plan Document. In the SAP, Policy SA9 sets out the restrictions to development within the strategic gaps for which the boundaries are defined on the Policies Map.
44. The strategic gaps were not covered in the October 2016 SA of the SAP. However, the SA of the strategic gaps has now been carried out [CS/13 Appendix 1]. In addition to the late SA, a background paper [SD13] was produced in October 2016 which reviews the strategic gaps as defined in the Consultation Draft SAP using revised criteria. Having regard to the evidence now available which has reviewed and reassessed the definition of the strategic gaps, I am satisfied that adequate environmental information is available to meet the requirements for SEA of the strategic gaps. I address the policy justification for the strategic gaps in more detail under Issue 7.

Issue 2 Does the SAP allocate sufficient land for residential development in order to deliver the requirement of the CS by 2026 in accordance with CS Policies CS13 and CS14?

45. The CS requirement is for a minimum of 20,985 dwellings in the period from 2006 to 2026. The SAP as submitted identifies the potential for the development of 21,281 homes which includes a windfall allowance of 897 dwellings based on past rates. Completions to 31 March 2017 are agreed with the housing industry at 8,847 dwellings. This figure is updated in the October 2017 mid-year assessment to 9,187 completions. Against the annualised rate of 1,049 dwellings required to deliver the CS requirement of 20,985 dwellings, the shortfall in the delivery of dwellings since the start of the CS period is agreed at March 2017 to be some 2,692 dwellings [SCG/2]. As a result there is a residual requirement for some 12,138 dwellings to be completed in the remaining 9 years of the CS period.
46. It is the purpose of the SAP to identify the detailed allocations required to deliver this level of new housing. To deliver the residual requirement of 12,138 dwellings by the end of the CS period (2026) an annual average completion rate of some 1,348 dwellings would be required. However, from the evidence that I read and heard concerning the deliverability of the sites allocated in the SAP as submitted, I consider that the rate of delivery as expected by the Council at April 2017 [ED22,ED23, ED24, and ED25] is optimistic and unlikely to be achieved. It is for this reason that I sought additional sites to be allocated through modification to the SAP. I consider the main sources of housing land supply below.

Weston Villages

47. The potential for slippage in the delivery of the strategic sites at Weston Villages (Winterstoke Village and Parklands Village) was recognised by the Inspector in his report of November 2016[ED10]. A joint delivery trajectory is produced annually between the Council and the three major developers[ED/28], but evidence indicates that the sites would not be completed within the CS period.
48. Some 550 dwellings were expected to be delivered from the sites at Weston Villages from 2011 to 2014, with an annual rate of some 450 dwellings expected from 2014 onwards. However, the total number of dwellings completed from 2011-16 was 567 dwellings, a significant shortfall on the anticipated delivery rate. The Council's updated Schedule 1 [CD4a] indicates a capacity at April 2017 of more than 5,600 dwellings. To secure the completion of the remaining allocation for Weston Villages by 2026, the rate of development would need to be accelerated above the originally anticipated annual rate of 450 dwellings.
49. The Council's anticipated rates of completions from 2017 onwards [CD4a] indicate an acceleration in completion rates from 239 dwellings in 2017/18 to 410 dwellings in 2018/19, with a peak of 750 dwellings in 2021/22. I note that the forecast for 220 dwellings in 2016/17 agreed between the Council and developers has been exceeded with 268 completions in that year. Nevertheless, the evidence from the developers of the Weston Villages sites is that in addition to other constraints which act to restrain delivery, including

changes in ownerships, the local housing market would not support the high rates of delivery forecast in the Council's trajectory. Policy CS20 also requires the development at Weston villages to be employment led, which could act as a further constraint on delivery.

50. In the five years from 1 April 2017, the Council expects the Weston Villages to deliver more than 3,000 dwellings. This would be significantly in excess of the originally anticipated annual completion rate of 450 dwellings. In the particular circumstances at Weston Villages which has been put to me, an annual average completion rate of about 450 dwellings is more likely than the rate anticipated by the Council. With this average annual completion rate, the whole of the 5,600 dwelling capacity remaining at April 2017 would not be delivered in the remaining 9 years of the CS period. I therefore find that there is a high level of uncertainty as to whether the Weston Villages will deliver the level of housing anticipated in the SAP by 2026.
51. In the event of a reduced level of contribution from Weston Villages the achievement of 1,348 completions each year to meet the CS requirement would be less likely.

Other allocated sites

52. In addition to the uncertainty concerning the delivery of the strategic sites, a number of the other allocated sites are affected by technical issues relating to flood and surface water management. The need for a flood risk assessment (FRA) and surface water or flood management scheme is identified for some 20 sites in Schedule 1 of the SAP, which are expected to accommodate over 900 dwellings. The Environment Agency (EA) has indicated that it has no objection in principle to the development of the sites, although it cannot indicate the scale of works which might be required in mitigation, or whether they would be capable of delivery. Whilst the submission of a FRA is standard practice in a number of instances, the negotiation of an appropriate surface water or flood management scheme for each of these sites could add to the lead in times for the start of development, and the mitigation measures could affect viability which may also delay implementation.
53. Five sites have been carried forward from the North Somerset Replacement Local Plan (NSRLP) into the SAP. Although the sites have been re-assessed by the Council in the preparation of the SAP, they have been allocated for residential development for some 9 years without being implemented. Around 240 dwellings are expected to be delivered on these sites. In my judgement unless there is a change in circumstances relating to each site, there remains uncertainty as to delivery within the remaining nine years of the CS period.

Other issues affecting supply

54. In relation to the lapse rate in planning permissions for small consented sites, the Council maintains its position that a rate of 10% is appropriate but I repeat my view following the hearings that this appears optimistic for North Somerset. Other sources of supply expected to contribute towards the CS requirement include windfall sites, change of use from rural buildings, and empty homes.

55. However, the influence of the lapse rate, rural building conversion and the re-use of empty homes on the housing supply is insignificant when considered against the potential shortfall in delivery that could arise from delays in the development of the Weston Villages; the uncertainties concerning the allocated sites which require flood risk assessment; and the issues relating to undeveloped sites brought forward from the NSRLP.

Other sources of housing land supply

56. Provision is made through the CS (Policies CS28, CS31, CS32) for unallocated housing schemes to come forward outside the settlement boundaries of the towns and service villages. The intention of this provision is to enable increased flexibility and to reduce the risk of housing under-supply in the event of any delays to the delivery of the strategic housing sites. However, the Council identifies the boundaries of strategic gaps which are in many locations tightly drawn around the main settlements. As a result the strategic gap designation may limit the potential for new housing sites adjacent to the boundaries of a number of settlements.
57. In these circumstances, the potential for new sites to come forward adjacent to settlement boundaries may be more limited than was intended by the CS Policies. Furthermore, time is required to negotiate planning permission on unallocated sites outside the settlements. At this stage in the lifetime of the CS it is unlikely that such provision could compensate for any shortfall in the delivery of housing which may result from the issues identified above which affect the strategic sites and other land allocated in the SAP.

Additional allocations as a result of modifications

58. In view of the uncertainty as to the deliverability of sites allocated in the SAP to meet Policy CS13 by 2026, I asked the Council to undertake further work to identify additional sites for allocation in the SAP, with a focus on sites capable of delivery within the next five years to boost the land supply to meet unmet housing need [ID4]. To provide more certainty that the CS requirement for 20,985 dwellings would be delivered by 2026, I asked the Council to test the potential for additional allocated sites to accommodate up to 2,500 dwellings.
59. In response to my request for additional work, the Council has concentrated on assessing those sites which it considers to be capable of demonstrating the potential to be delivered within the next five years in order to boost the five year housing land supply. The Council has not considered sites which would be more appropriately addressed as part of the strategic development locations in the JSP, or sites put forward through the examination process as omission sites which are not within the development pipeline and demonstrably deliverable. As a result of this approach, the capacity of sites identified for allocation through modification to the SAP is significantly below the 2,500 which the Council was asked to test.
60. Clearly it is in the Council's interests to move forward expeditiously with the JSP and the new local plan. The JSP will establish an up to date OAN in accordance with Government policy, and together with the new LP, identify the housing land required to deliver that OAN. In the circumstances of the SAP, which will have a limited lifespan, I accept that it is appropriate for the Council to concentrate on seeking to boost the delivery of housing over the short

term, rather than using its resources to test strategic and longer term housing allocations for the SAP. With the process of review at an advanced stage, I am satisfied that there will be an opportunity for any shortfall in housing land supply in the later years of the CS period to 2026 to be remedied.

61. The Council's assessment of additional sites which would be deliverable within the next five years identifies land for some 821 dwellings[CD4]. Those sites are allocated through **MMs 10-16, 20, 21, 24-26, 30-35, and 38-41**. The sites have been subject to the same process of assessment as the sites allocated in the submitted SAP, and I have found them to be sound. Sites on which development has been completed since the submission of the SAP are deleted through **MM42**. Other sites are added to Schedule 1 to reflect a current planning permission (**MM8, 9, 29, 36, and 37**). For land at Cox's Green, Wrington (**MM34**) an appeal (ref APP/D0121/W/16/3166147) has been allowed for 59 dwellings. The Council should therefore correct the number of dwellings to be provided on this site in Schedule 1 to reflect the appeal decision.
62. The Council has indicated that the purpose of the SAP is to allocate the sites necessary to deliver the CS housing requirement and to ensure that the Council can maintain a 5 year housing land supply [ID1, SD18]. In addition, I was asked at the hearings to examine the issue of whether the SAP would deliver a five year housing land supply (HLS). I therefore considered the five year HLS in the examination of the SAP.

Five year supply

63. A five year housing land supply was not established through the CS, and it is clear from the judgement in Oxted Residential Ltd v Tandridge DC, that it is not for the SAP to rectify this position. Thus having regard to the judgement, I consider that it is not necessary for the SAP to demonstrate a five year supply at the time of adoption in order to be sound. Nevertheless, the Council has asked for me to consider the matter and I heard discussions on deliverability during the examination.
64. In the most recent update of housing land supply in October 2017 [ED53] the shortfall in the delivery of dwellings since the start of the CS period is some 2877 dwellings. The issue therefore arises as to whether the shortfall should be made up over the whole of the remainder of the plan period (Liverpool approach) or within the first five years after the adoption of the plan (Sedgefield approach). There is also the question of whether there should be an additional "buffer" of either 5% or 20% brought forward from later in the plan period to reflect the level of the shortfall in the delivery of dwellings.
65. In his report on the remitted policies of the CS in November 2016 [ED10], the Inspector considered that Sedgefield with a 5% buffer was appropriate based on the evidence he heard at the examination of past rates of delivery of housing.
66. As stated in my note of the 26 June 2017[ID4] I understand the Council's argument that the rate of delivery in the early part of the Plan period should not be measured against the figure in Policy CS13. The adopted housing requirement at the time was significantly lower, the Council largely met those lower figures, and there was a period of economic recession. However, the

adopted CS requirement is representative of the need for homes within North Somerset. With completions at 569 dwellings in 2015/16 and 852 dwellings in 2016-2017, there has not been any uplift in housing delivery to the level required to deliver the CS requirement since the publication of the Inspector's report on the CS. As a result I consider that a record of persistent under delivery is established and that a 20% buffer would be justified. This would provide added choice and flexibility in the market and increase the potential for housing need to be met.

67. Having regard to the level of the shortfall in housing provision and thus unmet housing need, I came to the view in my note to the Council[ID4] that it should seek to provide a five year supply which accords with Sedgefield and which would provide a 20% buffer. With this approach, sites to accommodate some 9,745 dwellings would need to be identified at October 2017, with an annual average delivery rate of 1949 dwellings.
68. The Council's latest calculation of five year housing land supply identifies land to accommodate some 9,753 dwellings at October 2017 [ED/53]. This would provide 5 years supply on the basis of Sedgefield with a 20% buffer. There is considerable dispute as to the deliverability within five years of the sites identified by the Council which constitute this supply. However, the rate at which sites are developed is to a large degree dependent on the commercial decisions of developers. The Council will clearly need to monitor the rate of delivery achieved by the development industry, and take account of any shortfalls in housing supply over the remaining period in which the policies of the CS provide the strategic framework for the provision of housing land supply.
69. I reach no conclusion as to whether a five year supply of housing land has been demonstrated, since it is not a soundness issue for the SAP. However, having regard to the role of the SAP as stated in paragraph 4.1 of the plan, I find that the plan provides a sufficient balance between immediately available sites and longer term opportunities for residential development, and makes a positive contribution to the achievement of a five year housing land supply.

Conclusions on the delivery of the CS housing requirement

70. With the additional housing allocations introduced through modifications, the overall provision of housing land at October 2017 is calculated to be capable of accommodating some 23,080 dwellings [ED53]. This figure is some 2,095 dwellings above the Policy CS13 housing requirement, and on the Council's assessment, includes land to accommodate over 9,700 dwellings which is available for development within five years.
71. In terms of the housing land provision to meet the requirements of the Core Strategy to 2026, whilst there may be uncertainty as to the delivery of the strategic and some allocated sites at the rates expected by the Councils, there is headroom within the allocated supply which could provide compensation for any under delivery on these sites. This is a matter which will require close monitoring by the Council.
72. With the modifications to the housing land allocations I consider that the provisions in the SAP for the supply of housing land are sufficient to deliver

the strategy of the CS as set out in Policy CS13 and CS14 in the interim period prior to the adoption of the JSP and the new LP.

Issue 3 Should the SAP make specific site allocations for particular groups of people such as specialist housing for the elderly?

73. Policies within the CS provide for the delivery of specialist housing including special needs housing for groups such as older people. The primary policies to deliver the CS objectives are provided within the Sites and Policies Plan Part 1 (Development Management Policies), in which Policies DM40-43 provide the detailed guidance for meeting the needs of older and vulnerable people, including C2 uses such as residential care homes.
74. The adopted policy framework within these documents provides support to the delivery of specialist housing, provision of which can be sought within larger housing schemes as well as those targeted at a specific form of specialist housing provision. There is no evidence to support the view that providers of specialist housing are not able to compete in the market for housing sites. In these circumstances I find there is no requirement for the SAP to make specific site allocations to accommodate particular groups of people in order for the plan to meet the tests of soundness.

Issue 4 Does the SAP provide for the distribution and delivery of employment land as required in CS Policy CS20 and are Policies SA4, SA5 and SA6 in accordance with Government policy in relation to the safeguarding of employment sites?

Distribution and delivery

75. Policy CS20 seeks to provide at least 10,100 additional employment opportunities in the period 2006-2026, including around 114 ha of land for B1, B2 and B8 uses. The focus is on employment led growth at Weston-super-Mare to address existing imbalances. Limited opportunities are identified at the towns of Clevedon, Nailsea and Portishead where new employment development is generally limited to land allocations remaining from the NSRLP. Elsewhere economic activity appropriate to the scale of the settlement is sought.
76. The CS makes no link between the number of jobs being sought and the amount of employment land to be allocated. Clearly there are uncertainties inherent in the monitoring of the number of job opportunities which are provided within new economic development. Employment densities change over time, and vary significantly between different business uses. In the case of speculative development where the occupier is unknown, there can be no precise calculation of the number of jobs which a particular level of floorspace would provide. Nevertheless, the Council estimates that employment growth has been around 500 jobs each year from 2006 to 2016[CS/10], leaving just over 50% of the additional employment opportunities to be provided in the second half of the CS period.
77. The SAP is modified by **MM44** to correct errors in the size of sites and changes in the proportion of the site at Gordano Gate allocated for employment. The modified SAP identifies allocations for some 83.01 ha of employment land. In

the first half of the CS period [CS/10] some 5,000 jobs have been provided, and around 76.5 ha of B Class employment land has been developed. Whilst some of the completions have been on allocated sites, it is not clear what proportion has been provided through the redevelopment of existing employment or business uses. However, when the allocations in the SAP are considered alongside the level of completions to 2016, the CS requirement for 114 ha is clearly met.

78. The Council deletes Weston Gateway from Schedule 2 (**MM43**) and the 1.2 ha site is more appropriately allocated for residential development as "Land at Wilson Gardens/Scot Elm Drive" in Schedule 1 (**MM13**). This has no significant effect on the ability of the SAP to meet the requirements of the CS for employment land. The level of employment land allocation in the SAP is therefore appropriate and accords with the objectives of Policy CS20.
79. In terms of the distribution of the employment allocations, a comparison indicates some discrepancies between the proportions allocated to settlements in the indicative allocations identified in para 3.258 of the CS, and those allocated in Schedule 2 of the SAP [HS/3/2]. However, the comparison does not include the distribution of completions since 2006. Furthermore the distribution set out in the CS is not prescriptive. The distribution proposed in the SAP directs employment development to the main areas of population growth and accords with the aim of focussing employment development at Weston-super-Mare and in the Weston Villages. It does therefore generally accord with the objectives of Policy CS20.

Safeguarding employment sites

80. Employment policies SA4, SA5 and SA6 as submitted are unduly complex and provide little flexibility in terms of the change in use of land or premises either allocated for, or in use as, Class B1, B2 or B8 development. As a result the policies are not in accord with the economic policies of the NPPF. Modification **MM2** provides for the deletion of employment policies SA4, SA5 and SA6 and their replacement by a new policy SA4. I considered the wording put forward by the Council in the published modifications [ED45] and published some amendments for further comment by interested parties [ID-6]. Having considered those comments, together with the views of the Council, I have made some further minor amendments. New policy SA4 as identified in **MM2** will support the delivery of CS Policy CS20 in relation to the safeguarding of land for B1- B8 uses in N Somerset whilst ensuring that where there is no reasonable prospect of a site being used for those purposes, alternative uses of land or buildings will be permitted in accordance with paragraph 22 of the NPPF.
81. There is some uncertainty as to the deliverability of allocations brought forward from the NSRLP and which are allocated in Schedule 2. Employment sites which are carried forward from the NSRLP have been the subject of review by the Council prior to allocation in the SAP [SD11], but a number have been available for some time without being developed for employment purposes.
82. With new Policy SA4 in place, there is sufficient flexibility in the SAP to enable sites which are not suited for employment purposes to be brought forward for

other uses. Whether or not there is a reasonable prospect of the development of an allocation, or of the long term continuation in use of a site for employment purposes is a matter which needs to be assessed on the basis of detailed evidence in accordance with the employment policies of the development plan as a whole. Such an assessment would be most appropriate through the planning application process when the particular circumstances of the case could be thoroughly evaluated, having regard to modified Policy SA4. In these circumstances I am satisfied that the sites identified in Schedule 2 are appropriately allocated and the SAP is sound in this regard.

83. In dealing with residential allocations I referred to the site at Old Mill Road Portishead. This is listed in Schedule 1, residential allocations, but is currently in primarily employment use. I consider that it has been demonstrated that there is a significant demand for employment uses on this site, and that its loss to residential uses could be detrimental to the local economy. This is particularly the case in Portishead where the opportunities for new employment sites are limited.
84. In the submitted SAP, the site was identified to accommodate 20 dwellings. As modified in **MM23**, no figure is now provided for the residential element of any redevelopment scheme, and additional wording states that "no net loss of employment capacity will be supported". I consider that the modification provides recognition of the importance of this site to the local economy in terms of the provision of employment uses. The amount of housing to be accommodated on the site will depend on the provision of the existing level of employment capacity within any redevelopment scheme. As the Council prepares the new LP, it may wish to reconsider whether the site should remain within a schedule of residential allocations.
85. Modification **MM46** deletes Schedule 3 of the submitted SAP. This sought to safeguard existing employment sites. Safeguarding of these sites in accordance with national policy is now secured through Policy SA4.

Conclusion on the delivery of CS Policy CS20 and the safeguarding of employment sites

86. With the main modifications I consider that the provisions in the SAP for the distribution and delivery of B1-B8 employment land are sufficient to deliver the requirements of CS Policy CS20 in the interim period prior to the adoption of the JSP and the new LP. The new Policy SA4 provides for the safeguarding of B1-B8 employment sites in accordance with national policies.

Issue 5 To what extent does the SAP provide for any requirement for new or improved transport infrastructure?

87. Although Highways England states in its representation that there is "little or no strategic transport evidence underpinning the site allocations" in the SAP, the SAP has been prepared in the context of the distribution of development in the adopted CS to which no strategic highways objection was raised. In terms of the impact on the strategic road network (SRN), the strategy is to improve self-containment within Weston-super-Mare by linking new housing growth to employment growth. In addition, by allocating housing near to Junctions 20 and 19, notably Nailsea and Yatton, the strategy spreads demand across the motorway access points and thus lessens the impact on the SRN. In these

circumstances I am satisfied that there is no requirement for the SAP to provide for new or improved transport infrastructure in relation to the strategic road network.

88. In terms of the local highway network, the Council has carried out extensive modelling of site specific and cumulative impacts resulting from the allocations in the SAP. A package of infrastructure improvements required to facilitate the development of Winterstoke Village and Parklands Village has been identified and this is being used to secure developer contributions. A package of measures has been identified to improve the infrastructure in Yatton High Street which is being funded by development, and a spreadsheet model for Nailsea has been updated and is being used to develop a mitigation package for Nailsea. I am therefore satisfied that in terms of the local highway network, requirements for new or improved transport infrastructure as a result of the proposals in the SAP are being met.

Issue 6 To what extent are Policies SA7, SA8, SA9 and SA10 together with the associated allocations identified in Schedules 3, 4 and 5 to the SAP as submitted justified? Policy SA7 (Policy SA5 in modified SAP) and Schedule 4 Local Green Space

89. Policy CS9 sets out the green infrastructure priorities for North Somerset. It does not refer specifically to the designation of Local Green Space (LGS) but the CS confirms at para 3.139 that the list of priorities is not exhaustive. Following the introduction in 2012 of the LGS designation in the NPPF, the Council investigated the potential for LGS designations in the Sites and Policies Plan Consultation Draft. A large number of sites for LGS were subsequently put forward in responses to public consultation, and these have been assessed by the Council.
90. The NPPF refers to LGS as green areas for "special protection" which are of "particular importance" to local communities. The designation as LGS would rule out new development except in "very special circumstances" which sets an equivalent test for development as for land which is designated as Green Belt. Furthermore, identifying land for LGS should be consistent with the planning of sustainable development and "complement investment in sufficient homes, jobs and other services". NPPF para 77 also makes it clear that LGS designation "will not be appropriate for most green areas or open space."
91. It is clear from the guidance in the NPPF that LGS designation should be used with care, bearing in mind that such designations are expected to endure beyond the plan period. The designation should only be used where the green space is demonstrably special to the local community, and NPPF paragraph 7 lists the criteria against which such designations should be judged.
92. The Council's assessment of the potential sites for LGS has followed the guidance in the NPPF and in the PPG[SD12]. Although a large number of sites have been designated, having regard to the additional provision of housing land which has now been provided through modifications, I am satisfied that the designations are generally consistent with the planning of sustainable development as required by the NPPF. There are just two deletions from the LGS schedule as set out below.

93. One site at Brookfield Walk is deleted from the LGS schedule through **MM47**. The designation of this site as LGS is not appropriate since the site is already in the Green Belt and therefore enjoys a significant level of protection.
94. A further modification **MM54** to the LGS schedule is the deletion of the "May Day" field at Claverham. This site has been considered by the Examiner of the Claverham Neighbourhood Plan. The Examiner considered detailed evidence and information relating to the proposed designation as LGS and came to the view that there is not sufficient evidence that the site is demonstrably special to the local community in terms of access rights and the longevity of community events that have taken place. As a result of the Examiner's recommendation the site has been deleted from the Neighbourhood Plan as a LGS.
95. I agree with the Examiner's view. The site is in private ownership and the Examiner states that the community has only been permitted to use the field relatively recently (2013-2016). There is no guarantee that this use will be continued into the future and without any other access rights, it does not comply with the strict tests which are required by the NPPF for the designation of LGS.

Conclusions on LGS

96. Although there are a significant number of sites allocated in the SAP as LGS, the Council has applied the national criteria in their assessment and consequent designation of the sites. Whilst the aim of designation is to provide long term protection, there will be an opportunity to review the designations and to ensure that they remain consistent with the planning of sustainable development in the light of the new strategy which is being brought forward in the JSP.
97. With the modifications to the Schedule of LGS I am satisfied that the SAP is sound in this respect.

Policy SA8 (Policy SA6 in modified SAP) Undesignated Green Space

98. Submitted Policy SA8 would become Policy SA6 as modified with the background text in **MM3**. The modification allows for development which affects undesignated green spaces, subject to criteria against which proposals would be assessed. The policy as modified therefore complies with Government policy.

Strategic Gaps and Policy SA9

99. There is no reference to strategic gaps in the NPPF or in PPG which would provide any national policy basis or advice on their designation or the detailed definition of their boundaries. However, the provision of strategic gaps has its policy base within CS Policy CS19, and their broad locations are identified in paragraph 3.243 of the CS. The relevance and need for the designations was questioned by objectors, but as the purpose of the SAP is to deliver the CS policies, it is appropriate for the SAP to identify the detailed boundaries for the strategic gaps. The strategic gaps identified on the SAP Policies Map generally accord with the broad locations listed in para 3.243 of the CS. The Council has followed a reasonable set of criteria in the review of the strategic gaps [SD13]

in order to define the boundaries, including the avoidance of any overlap with the Green Belt.

100. The principle and broad locations of the strategic gaps are established in the CS and that document cannot be amended through modifications to the SAP. The Council has put forward some modifications to the boundaries as submitted in the SAP. **MM52** extends the strategic gap south and south east of Oaktree Park to further protect the separation of Oaktree Park and Locking in accordance with CS Policy 19; and **MM53** excludes from the strategic gap land north of Oldmixon Road which has planning permission for residential development. These modifications ensure that the boundaries are coherent and justified, and that the CS policy is delivered.

Conclusion on strategic gaps

101. There is no national policy for the provision of strategic gaps, or encouragement in Government policy to have such designations. In these circumstances the emerging JSP and new Local Plan would provide the opportunity for the Council to reconsider the principle of continuing with this designation. However, in so far as the SAP is required to deliver and accord with the CS, it is sound in this regard.

Policy SA10 (Policy SA8 in modified SAP) and Schedule 5

102. Policy SA10 allocates and safeguards land for community use in Schedule 5 (which becomes Schedule 4 in the modified SAP). Sites identified in Schedule 5 are subject to Policy DM68 of the Sites and Policies Plan Part 1.
103. Schedule 5 is subject to **MMs 48-50**. **MM48** updates the SAP by deleting the primary school at Winterstoke Village West which is now constructed and open. In **MM49** the reference to allotments in the allocation at Mendip Road, Yatton is now deleted and the site is safeguarded for cemetery use to more accurately reflect its likely future use. **MM50** deletes the allocation for a community hall where the land is in private ownership and there is no funding or other provision made for such a development. In addition it deletes nine locations identified as Strategic Open Space, which have been carried forward from the NSRLP. There is no basis in policy, at either national or local level for the retention of these sites in Schedule 5 and therefore the deletions are necessary to the soundness of the SAP.

Issue 7: Are the settlement boundaries appropriately defined?

104. Although it is stated in the SAP, para 4.12, that the settlement boundaries have been reviewed as part of the SAP and remain fit for purpose, no evidence of the Council's work has been submitted to the examination.
105. The Council has indicated that settlement boundaries would be reviewed as part of the work on the new LP. In these circumstances I make no recommendation for that work to be undertaken in the context of the SAP. However, it would be logical for the new residential allocations within the SAP to be included within the settlement boundaries on the Policies Map in the new LP.

106. **MM51** amends the settlement boundary of Sandford to that shown on the NSRLP. This in itself does not raise a soundness issue.

Public Sector Equality Duty

107. The SAP is the subject of an Equality Impact Assessment (EqIA) [SD15] carried out by the Council. The EqIA indicates that the policies of the SAP are likely to have a neutral or beneficial impact on the equality groups within the district. I have no reason to disagree with this conclusion.

Assessment of Legal Compliance

108. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Site Allocations Plan has been prepared in accordance with the Council's LDS October 2015.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in March 2015. Consultation on the Site Allocations Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report October 2016 sets out why AA is not necessary. Natural England supports this.
Climate change	The Site Allocations Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
National Policy	The Site Allocations Plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The Site Allocations Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

109. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

110. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the North Somerset Council Sites and Policies Plan Part 2: Site Allocations Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Wendy Burden

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix XI

Bleadon, highways technical note

Chris Burton

Mon 06/08/2018 15:59

Sent Items

To: David Tate <David.Tate@n-somerset.gov.uk>;

Cc: Amanda Sutherland <amanda@sutherlandpls.com>;

 1 attachments (3 MB)

cTc-2017-F-023-Bleadon Tech Note 2.pdf;

Dear Mr Tate

The following is sent on behalf of Amanda Sutherland.

Please see the attached highways technical note with regards to Bleadon.

Kind regards

Chris Burton

Get [Outlook for Android](#)

Bleadon

Technical Note 2;

Response to Highways Comments

1. INTRODUCTION

- 1.1 **cTc** is commissioned by Sutherland Property and Legal Services Ltd to provide transport, traffic and highway support for mixed use, residential, commercial and local centre development proposals of a greenfield site in Bleadon. The site is located between the A370, Bridgwater Road and Bleadon Road and the Planning Application is supported by a Transport Assessment (TA) report which has been compiled by **cTc** and which concludes that the proposals comprise sustainable development, are safe and will generate no off-site traffic impact in regard to either capacity / congestion, or road safety. Subsequent to local a request from the Planning Authority (LPA), cTc also provided Technical Note 1; Skeletal Green Travel Plan, to further advise the LPA in regard to transport issues of the proposals.
- 1.2 Subsequent to registration of this Application a preliminary Highways Response has been uploaded to the Planning Portal, which raises a number of additional requests and comments. This Technical Note 2 responds to the points raised in order to furnish the LPA with sufficient detailed information to permit a positive determination of this Application.
- 1.3 Section 2, below, discusses the highways and transportation issues raised in the Highways response and presents a strategic summary response to these. Subsequent sections address the matters raised in more detail.
- 1.4 The conclusion of **cTc**'s analyses remains that the development proposals are sustainable and can be accommodated on the Application site without causing deleterious impact on the operation of the local transport system.

2. HIGHWAYS RESPONSE

2.1 The Highways response is contained at Appendix A and briefly summarised below;

1. Figure 3.1 should be appended with available visibility splays to confirm that these can safely be achieved;
2. How will the proposed site access junction interact with the two existing junctions serving Bleadon and should one or both of these be closed? Can the proposed junction cater for such closure(s)? And would such a closure enable enhanced sustainable movement links between Bleadon and Bridgwater Road?
3. A preliminary design should be provided for the proposed northern junction onto Bleadon Road. Confirmation should be provided that adequate visibility is achieved. Consideration should be given to reducing traffic speed on Bleadon Road.
4. A preliminary design should be provided for the proposed southern junction onto Bleadon Road. Confirmation should be provided that adequate visibility is achieved. Consideration should be given to reducing traffic speed on Bleadon Road.
5. Concerns are expressed in regard to road safety for right turning traffic from the site, onto Bridgwater Road in the direction of Weston-super-Mare.
6. The LHA do not agree with the forecast mode-split of journeys generated by the Health Centre and Local Shops, including cTc's assessment of trip internalisation.
7. Additional allowance is required for office trips.
8. Further details are required to demonstrate the analysis of census information in regard to generated trip distribution.
9. The LHA have questioned the likelihood and resultant operational implications of existing Bleadon village traffic re-assigning to pass through the proposed development site in order to reach Bridgwater Road, rather than using either of the two existing junctions.

10. The LHA have requested consideration of the likely operational impact of development generated traffic on the existing two junctions accessing Bleadon from Bridgwater Road, where some peak hour congestion is noted.
11. The LHA have questioned proposed car and cycle parking levels.
12. Details are requested in regard to;
 - Pedestrian / cycle access
 - Refuse collection strategy
 - Adequacy of the access and internal circulatory arrangements for use by refuse vehicles
 - Access strategy
 - Likely requirement for TROs.
13. Consideration of additional policy documents has been requested, including those adopted since the TA was written.
14. Further demonstration is required of how the scheme integrates with the existing Bleadon village.
15. Further public transport details are requested.
16. Further demonstration is requested of how key facilities are to be accessed, particularly my sustainable modes.
17. Further detail has been requested in regard to the operation of the proposed Residential Travel Plan.

2.2 Each of these is considered below.

3.1 MAIN ACCESS FROM BRIDGWATER ROAD AND VISIBILITY

3.1 A manual radar survey has recorded interpeak hour speeds on Bridgwater Road, on 28th June 2018. The recorded speeds are summarised in Table 3.1, below with the survey sheet included at Appendix B.

Table 3.1; Summary of Bridgwater Road Speed Recordings

Direction	Recorded Speeds	
	Mean	85 th Percentile
Northbound	45.1	48.0
Southbound	44.2	48.0

- 3.2 The weather on the day of the survey was dry and bright. Strictly speaking for calculation of required visibility splays, wet weather speeds should be used and in order to replicate these from the results of a dry, a deduction of 4kph is recommended in TA22/81. In this instance, however, visibility is plentiful and the recorded speeds have been used unadjusted in order to calculate Stopping Site Distances (SSD), which can be converted into safe visibility requirements. These are calculated from standards equations and using parameters developed in Manual for Streets 2. Given that the 85th percentile speeds are identical for each direction, the Stopping Sight Distances are calculated to be 105.5m in either direction. Adding the average car bonnet length of 2.4m results in a safe Stopping Sight Distance of 107.9m for each direction, which becomes the appropriate visibility splay 'y' distance.
- 3.3 The consultation response identifies an 'x' distance of 9m, which reflects the requirements of TD42/95, however, this is specified as appropriate for Trunk Road junctions, which this is not. **cTc** maintains that an appropriate 'x' distance in this instance is 2.4m, which enables the full extent of the visibility splay to be viewed from a stationary car at the giveway line of the site access junction. 'x' distances of greater than 2.4m are appropriate in situations where traffic capacity may be at a premium in order to permit drivers to view both directions along the main road some distance from the junction, hence make a decision as to how safe it is to continue before bringing their vehicle to a standstill. This enables side road traffic to move quicker through the junction, thereby increasing traffic capacity.
- 3.4 A downside of increasing 'x' distance is that it invites side road traffic to attempt to pass through the junction without stopping and can lead to driver taking greater chances than they might otherwise. In situations where mainline traffic is travelling particularly quickly it may be considered disadvantageous to halt traffic and thereby require standing starts and significant acceleration in order to reach the speed of passing traffic on the mainline. In this instance, however, speeds of around 45mph mean and 48mph 85th percentile are not sufficiently high as to create such a concern. **cTc** is of the view that providing shorter 'x' distances in this instance enhances road safety, however, it is noted that the existing verge is very wide and longer 'x' distances are available should these be required. Consequently and in light of the speed data now collected, appropriate visibility splays in this instance comprise 2.4m, or potentially if the LHA has concerns about forcing vehicles to stop, 4.5m by 108m in each direction. These are easily achievable and are illustrated on Figure 3.1 herewith. **cTc** recommends against artificially increasing the 'x' distance to the 9m specified in the highway consultation response, however, should this become a sticking point in discussions with the LHA, the existing wide verge makes 9m x 108m easily achievable.

3.5 Visibility splays measured on-site confirm that 2.4m by in excess of 290m are available in each direction. Clearly, this is not an issue.

3.6 The preliminary design of the junction complies with modern design standards and in the absence of any evidence to the contrary is considered safe.

4. JUNCTION INTERACTION AND POTENTIAL ADJACENT JUNCTION CLOSURE

4.1 Separation between the proposed access junction and the adjacent junctions comprises;

- 580m to the junction to the north; and,
- 330m to the junction to the south.

4.2 The existing two junctions serving Bleadon are historic and do not necessarily reflect modern design standards. Conversely, the proposed site access junction does reflect modern design philosophy and standards, will be inherently safe in design and provide substantial traffic capacity.

4.3 There is no reason to conclude that construction of the proposed site access junction will result in any material interaction with the operation of either of the existing junctions in light both of the junction separation and the standard of proposed junction design. Access is to be achieved via a ghost island right turn provision, hence removing right turning traffic from the northbound throughflow away from the small volume of traffic which may be accelerating away from the existing southern junction, having just joined Bridgwater Road northbound traffic. The access design has been altered in response to officer's comments in order to enable southbound traffic to more easily pull over without impeding through traffic and hence further reducing any potential for interaction with traffic accelerating, having joined Bridgwater Road at the northern Bledon junction.

4.4 In regard to whether or not one or both of the existing Bledon junctions ought to be closed in parallel with constructing the proposed new ghost island priority junction to access the proposed development, this would be a matter for the LHA to decide. There is no operational imperative for this and it does not represent a component of the proposed development, however, capacity analyses of the proposed junction have confirmed substantial spare capacity, above and beyond that required for successful operation in regard to accessing the proposed development.

4.5 Were the LHA to conclude some benefit in closing either or both of these existing junctions it would be possible to accommodate a substantial volume of additional traffic using this junction and in light of existing road safety concerns at the southernmost junction it may be that the additional benefit available could be attractive to the LHA. This can clearly be accommodated.

5. NORTHERN JUNCTION ONTO BLEADON ROAD

5.1 A preliminary design of a proposed access junction at this location is provided as Figure 5.1. This includes visibility splays, calculated from the previously presented ATC survey and an indication of speed control measures in the form of a raised pedestrian crossing. The latter is shown to connect with the internal network and over, onto the existing footway on the eastern side of Bleadon Road.

5.2 The combination of speed reduction measures with visibility splays calculated from the surveyed speeds clearly represents an onerous scenario in that the arrangements are simultaneously designed to cater for existing speeds, whilst also reducing same. This is therefore definitively safe.

6. SOUTHERN JUNCTION ONTO BLEADON ROAD

6.1 Similarly, a preliminary design is provided at Figure 6.1 also demonstrating visibility splays and speed control measures. The same onerous assessment of visibility is provided.

7. RIGHT TURNING TRAFFIC ONTO BLEADON ROAD

7.1 The junction has been subject to a preliminary design using modern design standards and has been shown to achieve visibility splays considerably exceeding safe minimum requirements. There is no reason to believe that such as design should be anything other than safe, however, in order to confirm this, standard highway design procedure would require the undertaking of a series of Road Safety Audits at various stages throughout the design and construction process. That the design follows modern procedures and standards means that there is no reason to suspect any issues of principle, however, the Safety Audit procedure will ensure that any design specifics of concern are picked up and addressed during the finalisation of the design and subsequent construction.

8. TRIP RATES AND INTERNALISATION

- 8.1 **cTc**'s forecasts have been achieved using the TRICS database, which is a nationally accepted professional standard for such calculations. **cTc** has many years of experience of using this tool and, although initial assessments were undertaken using a more heavily constrained data set, focussing more clearly on rural locations, hence lower accessibility sites, the resultant diminution of data resulted in an analysis of dubious statistical relevance. Of particular importance and unexpectedly, the concentrated rural assessment reduced the peak hour traffic generation in comparison with the wider data selection ultimately used.
- 8.2 In order to demonstrate the above, Appendix C comprises the original, rural TRICS analysis and confirms reduced traffic generation than provided in the submitted TA.
- 8.3 Notwithstanding the above, **cTc** has returned to this analysis. It is no longer appropriate to rely on the previous, statistically more robust assessment, as the TRICS database has since been revised in light of new data. Appendix D comprises a re-assessment of trip generation using the current issue of the database (code 180718 B18.39) to identify an 85th percentile value for traffic generation. This clearly exceeds the level of traffic realistically anticipated in regard to the proposals and therefore provides a highly robust assessment. This level of traffic generation has been analysed using the PICADY traffic capacity model and is discussed below subsequent to further traffic forecasting adjustments requested by officers. These further analyses have also adjusted the trip internalisation assumptions to show 50% of trips being external and accessing the site from the A370. Given that this use will serve predominantly Bleadon and its rural hinterland, this is considered an onerous and hence robust assessment.
- 8.4 The inescapable conclusion is that the proposed junction is of a design appropriate for the location and to serve the proposals with substantial additional spare traffic capacity.

9. OFFICE TRIPS

- 9.1 These have been included in the PICADY assessment summarised below. Traffic generation has been forecast using TRICS database, in common with the other uses examined. The TRICS reports are included at Appendix D and summarised in Table 9.1, below.

Table 9.1; Summary of TRICS Analysis of Trip Generation of the Proposed Offices

Mode	Trip Rate per 100sqm				Scale (100sqm GFA)	Trips			
	AM Peak Hour		PM Peak Hour			AM Peak Hour		PM Peak Hour	
	Arr	Dep	Arr	Dep		Arr	Dep	Arr	Dep
Pedestrian	0.243	0.021	0.006	0.165	3	1	0	0	1
Cyclist	0.030	0.000	0.000	0.030		0	0	0	0
Public Transport	0.090	0.000	0.000	0.090		0	0	0	0
OGV	0.003	0.000	0.000	0.006		0	0	0	0
Vehicle Occupants	2.061	0.201	0.246	2.157		6	1	1	6
Vehicles*	1.868	0.234	0.231	1.962		6	1	1	6

*Represents traffic generation

10. CENSUS CALCULATIONS

10.1 The LHA has agreed that this comprises an acceptable base source of information for such calculations and simply requested further detail of the calculations themselves. These were undertaken in spreadsheet form and are included at Appendix E.

11. POTENTIAL FOR RE-ASSIGNED VILLAGE TRAFFIC

11.1 The PICADY calculations described below have confirmed very substantial quantities of spare capacity at the proposed site access junction. **cTc** has previously presented the results of a Manual Classified Count (MCC) survey of the northern Bleadon village access junction at Bleadon Road, confirming a total two-way in flow to the junction during the morning peak hour of 125 vehicles and 128 vehicles during the evening peak hour. No such survey has been undertaken at the southern junction on Bridge Street, however, the convoluted nature of Bridge Street with parked vehicles forcing opposing traffic to stop and give way will make it an unpopular route into the village. **cTc** judge therefore that the bulk of traffic currently accessing the village from the A38 will be doing so via the Bleadon Road junction, hence for the purpose of sensitivity testing the proposed access junction all of the minor arm traffic at the Bleadon Road junction has been reassigned to the proposed site access onto the A38.

11.2 Table 11.1, below summarises the total traffic demand accessing the A38 during the peak hours in the most onerous sensitivity tests undertaken, along with the RFCs and consequently the approximate spare operational capacity exhibited in these tests.

Table 11.1; Summary of Demand and Capacity of A38 Entry Movements From the Onerous Sensitivity Test PICADY Analyses

Period	Hourly Demand Entering A38	Max RFC	Approx Additional (Spare) Capacity	Approx Additional Demand From Village
AM Peak	223	0.46	262	125
PM Peak	231	0.28	594	130

11.3 The above consideration provides a broad, logical consideration of the likely impact of village traffic diverting via the proposed site access junction and confirms that this would not create a material concern, as the available spare capacity at all times exceeds the additional demand.

12. CAR AND CYCLE PARKING

12.1 The Application is in outline with access determined. The Applicant is content to accept a Condition requiring LHA published standards to be complied with in regards car and cycle parking. The site is clearly of sufficient size that these can easily be accommodated.

13. ADDITIONAL DETAILS

13.1 Save for access strategy, which is set out at a high level in the Application and details are inappropriate until such time as more layout design work is undertaken at Reserved Matters stage, all other details requested are appropriate to be conditioned, to be determines as Reserved Matters.

14. UPDATED POLICIES

14.1 The policy perspective of this scheme has changed during and since the finalisation of the design and submission of the Application. The new policies are typically of similar form to their predecessors and key items are considered below.

14.2 At the time of writing the previous TA the Council's website confirmed that the adopted Core Strategy was the 2012 version. The key relevant Policy in the 2012 Core Strategy which was quoted in the TA was Policy CS10; Transportation and Movement. Since then, Core Strategy 2017 has been adopted and again the key relevant policy remains CS10; Transportation and Movement. The key quotation in the TA from Paragraph 3.152 of the explanatory text to policy CS10 in the 2012 Core Strategy remains unaltered in the now adopted 2017 document, still at Paragraph 3.152. The key thrust of the Core Strategy remains the same in that the key determinant remains sustainable accessibility.

- 14.3 Although rural, the proposed development site is readily accessible by means of bus stops serving the adjacent village being located on the immediate periphery of the site. Key pedestrian linkages can and will be provided within the site and connecting to the existing bus stops. In addition, additional parking is proposed on the south-eastern periphery of the site, which will enable residents of Bridge Street to park convenient to their homes whilst freeing up Bridge Street but will also permit villagers from the outermost extents of the village and the surrounding hinterland to drive to the site, park and interchange to travel onwards by bus, creating a transport hub for the wider existing village.
- 14.4 The criticisms in the Consultation Response in regard to lack of detail are considered unreasonable on the grounds that the Application is in Outline only. Further detail will be provided in due course as part of the Reserved Matters Application and at this stage it is appropriate only to confirm that sustainable accessibility will be made available. The above confirms that high quality linkages to the existing bus stops can and will be provided.
- 14.5 The West of England Joint Spatial Plan has also been adopted since the TA was drafted. This confirms the Region’s dedication to sustainable development in regard both to land-use decisions and transport infrastructure. Paragraph 3 identifies;
- “3 In tandem with the JSP, a Joint Transport Study (JTS) has been prepared. The JTS has identified potential future strategic transport proposals for delivery up to 2036 that address current challenges on the network and to inform future development proposals in this plan. The JTS sets out the following Transport Vision: “Transport in the West of England will be transformed over the next 20 years through a programme of complementary measures designed to address underlying challenges and to enable the sustainable delivery of new housing and employment growth.”***
- 14.6 The above extract confirms the interaction and close inter-relationship between the two areas of land-use planning and transport planning, with each critical to the delivery of the other’s primary goals. In Paragraph 5 it confirms that ***“The JSP will form the strategic policy for individual Local Plans prepared by the four authorities”***, hence the above quotation from the newly adopted Local Plan reflects the priorities set in the JSP, however, in Paragraph 8 it confirms that ***“The JSP is not a qualifying document for establishing planning permission in principle under the Housing and Planning Act 2016.”***

- 14.7 In Paragraph 14, the JSP identifies its priorities for Strategic Development Locations and how these are focussed predominantly in and around urban areas including Weston super Mare. In addition it defines Strategic Development as **“500+ dwellings”** and consequently these proposals located in Bleadon do not comprise Strategic Development. In Paragraph 11 it acknowledges that **“An allowance is proposed to be made for ‘nonstrategic growth’ in sustainable locations to accommodate smaller scale development in villages and towns...”**, hence this sustainable location in Bleadon is clearly appropriate for the nonstrategic proposals promoted. Paragraph 15 confirms **“Sustainability is closely related to proximity and accessibility to services and facilities, particularly in Bristol, Bath and Weston-super Mare, and the potential to use existing and new transport corridor opportunities.”** The high frequency of bus service stopping immediately adjacent to the site and with the potential for diversion of services through the site should that be deemed by service operators to be desirable confirms that this site is highly sustainable in the terms eschewed in the JSP.
- 14.8 The above summaries confirm that the proposals are in line with the primary thrust of newly adopted local policies in both the Local Plan and the JSP. It is not the purpose of this TA or addendum to discuss the planning merits of the Application as those are covered elsewhere and by others.
- 14.9 In addition to the above, the West of England Joint Transport Strategy has also been adopted since the drafting of the TA report. In Section 1.1 it is identified that **“The purpose of the Joint Transport Study was to provide a clear direction for the long-term development of the transport system in the West of England to 2036 and beyond”**. This makes clear that it is the JTS’ role to set the strategies and priorities appropriate to cater for the Region’s planned development, not vice-versa, hence whilst the JTS can inform the planning process it is not its logical role to determine land-use planning issues, but to cater for them.

14.10 Within the **“West of England Transport Vision”** the target of **“...more than doubling the trips made by cycling and public transport, resulting in a significant reduction in the mode split for journeys by car”**. The excellent bus services connecting to major nearby urban centres and transport hubs confirms that the site is readily accessible by public transport and the on-site infrastructure, which will be the subject of consideration under a Reserved Matters Application in due course, will cater well for cycling. Combined with the quiet local country lanes which are attractive for cycling, the site will cater well for journeys from throughout Bleadon and the surrounding rural hinterland to access the proposed local centre, including healthcare provision by bicycle. Cycle parking can also be provided convenient for the bus stops adjacent to the site on the A370 thereby encouraging interchange between sustainable modes for people living in and near Bleadon wishing to travel further afield by bus. Such details can be secured at the Reserved Matters stage and in conjunction with a detailed Travel Plan.

14.11 In addition to the above, the West of England Joint Transport Plan 3 addresses transport priorities for transport in the Region and essentially presents an action plan for achieving the strategy set out above. The LTP3 is therefore based on and directed by the JTS. The Vision is summarised in Paragraph 2.1 thus;

“In a nutshell we want an affordable, low carbon, accessible, integrated, efficient and reliable transport network to achieve a more competitive economy and better connected, more active and healthy communities.”

14.12 In regard to the proposals considered herein, the key aspects of the above are in the phrases;

- **“...low carbon...”**
- **“...connected...”**
- **“...active...”** and
- **“...healthy...”**

14.13 The adjacent bus stops encourage journeys by public transport connecting into nearby urban centres, thereby contributing to a low carbon and connected economy, whilst the rural lifestyle available in this area typifies active and healthy living. High quality pedestrian and cycle infrastructure to, through and within the site will encourage integration with the rest of the village by sustainable modes and onward travel in the surrounding countryside by healthy means.

15. INTEGRATION

- 15.1 Details of integration with Bleadon village will come out of the design process which will be subject to a Reserved Matters Application. This cannot be finalised until the internal design has been progressed and that is not for determination in this current outline application.
- 15.2 The additional drawings provided herein in regard to the two junctions onto Bleadon Lane confirm pedestrian accesses at these locations and adjacent crossings. A further pedestrian connection is proposed to the south in order to enable residents to readily access areas of the site which could be utilised for car parking, should that be deemed beneficial and pedestrian linkages to the A370 bus stops will provide enhanced accessibility for existing Bleadon residents to the bus services on this important route. Again, these are appropriate for consideration as Reserved Matters.

16. PUBLIC TRANSPORT

- 16.1 Bus service provision has changed since the TA was drafted and this is reviewed in Table 16.1, below.

Table 16.1: Bus Service Summary.

Service	Route Summary	Approximate Frequency		
		Weekday	Saturday	Sunday
B1	Weston-super-Mare - Uphill - Bleadon	4 return journeys between 08:35 and 16:02	-	-
20	Weston-super-Mare - Brean - Burnham-on-Sea	Every 30 minutes from approx. 07:55 to 19:50	Every 30 minutes from approx. 07:55 to 19:50	Hourly between 09:20 and 18:20
				Contd...

...Contd		1 return		
754	Weston- super-Mare - Wedmore	journey daily; at approx. 10:00 and 14:00	-	-

17. KEY FACILITIES

17.1 Key facilities requiring frequent access include;

- Employment;
- Education;
- Retail; and,
- Social / leisure.

17.2 Figure 17.1 identifies locations for each of these with appropriate sustainable access routes indicated for each.

18. TRAVEL PLAN

18.1 It is agreed and has always been proposed that these proposals should be supported by a comprehensive Travel Plan. A skeletal Plan has been provided as an indication and undertaking of the kind of measures which could be considered within the Plan. Any attempt to further detail these measures or calculate targets in the absence of resident specific data would be flawed and require to be revisited once the site is largely built out and occupied. It is far more productive in terms of ensuring an effective Plan to agree a skeletal indicative framework at planning stage, with further detail to be added at Reserved Matters, when more detail is available of housing types and target demographics. Ultimately, the detailed plan can only be finalised once residents are in situ and their bespoke travel requirements can be identified.

18.2 **cTc** firmly advocates implementation of an effective Travel Plan, which should only be undertaken once the relevant data is available and this should be secured via condition and / or Section 106 Agreement.

19. FURTHER PICADY ASSESSMENTS

19.1 The results of the further capacity assessments described above are summarised in Table 19.1, below, with complete PICADY reports contained at Appendix F. These show spare traffic capacity available in the proposed site access junction for all scenarios.

Table 19.1; Summary of PICADY Analysis.

Scenario	Period	Arm	Max RFC	Max Queue
2018 + Development	AM Peak Hour	Site Left-Out	0.01	0.0
		Site Right-Out	0.19	0.2
		A370	0.01	0.0
	PM Peak Hour	Site Left-Out	0.01	0.0
		Site Right-Out	0.11	0.1
		A370	0.01	0.0
2023 + Development	AM Peak Hour	Site Left-Out	0.01	0.0
		Site Right-Out	0.2	0.2
		A370	0.01	0.0
	PM Peak Hour	Site Left-Out	0.01	0.0
		Site Right-Out	0.12	0.1
		A370	0.02	0.0
2023 + Development + Village Traffic (Sensitivity)	AM Peak Hour	Site Left-Out	0.05	0.0
		Site Right-Out	0.46	0.8
		A370	0.03	0.0
	PM Peak Hour	Site Left-Out	0.03	0.0
		Site Right-Out	0.28	0.4
		A370	0.04	0.0

20. CONCLUSIONS

- 20.1 **cTc** has produced a comprehensive Transport Assessment and supplemented this with additional documentation pertaining to Green Travel Initiatives.
- 20.2 It is regrettable these matters had not been raised in a manner which could have allowed discussion between both parties as it is clear that each of the matters raised is readily soluble and indeed, many are appropriate for subsequent determination as Reserved Matters.

20.3 **cTc** is clear that there is no defensible transportation, highway or traffic reason for objection to the Application proposal.

Client:		Sutherland Property and Legal Services Ltd	
Project Name:		Bleadon Road, Bleadon.	
Project Number:		2017-F-023	
Report Title:		Technical Note 2; Response to Highways Comments	
Created by:	Carl Tonks	Date:	August 2018
Proofed by:	Jacqueline Ireland	Date:	August 2018
Approved by:	Carl Tonks carl@tonks-consulting.co.uk	Date:	August 2018
www.tonks-consulting.co.uk		01170 055 155	

FIGURES



OS_LICENSE 100022432

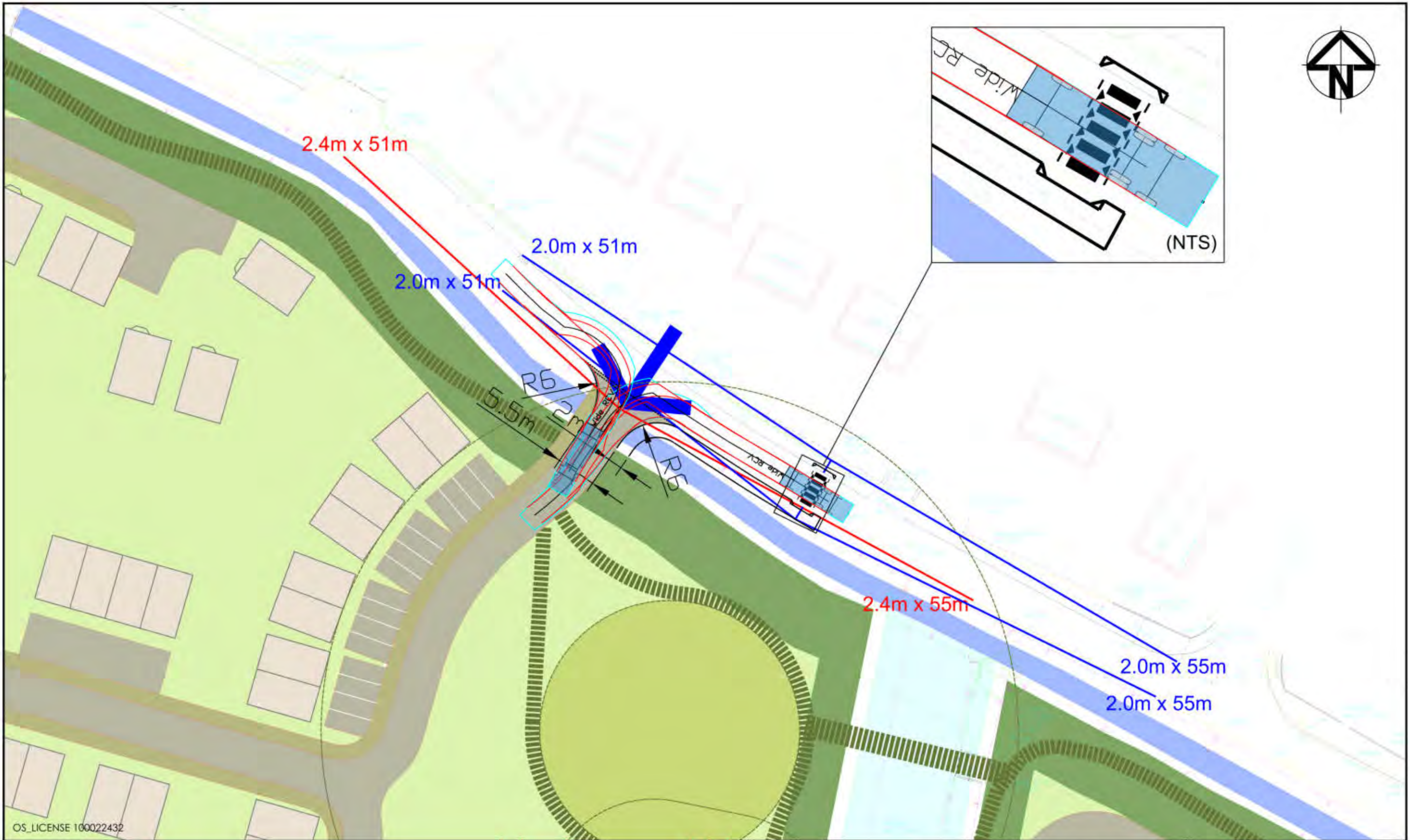
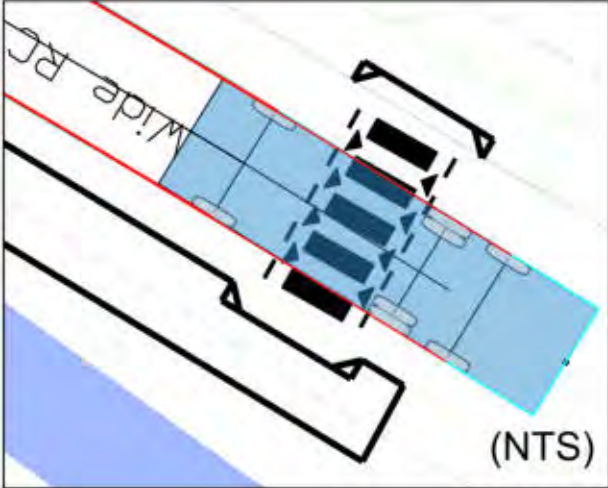
...					
Rev	Date	Description	Drm	Chk	App
-	23.07.18	ORIGINAL ISSUE	EP	CT	CT

Sutherland Legal and Property Services Ltd.	
Bleadon.	

Figure 3.1
Proposed Access
Arrangement and
Visibility on Bridgwater
Road.

SCALE: 1:1000 @A3
REV -
2017-F-023-015

carl TONKS consulting
523 Horizon, Broad Wier, Bristol BS1 3DJ
T - 0117 382 0507 M - 07866 543939
www.tonks-consulting.co.uk



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Key

- Site access visibility
- Pedestrian crossing visibility

Rev	Date	Description	EP	CT	CT
-	23.07.18	ORIGINAL ISSUE	EP	CT	CT
			Drm	Chk	App

Sutherland Legal and Property Services Ltd.

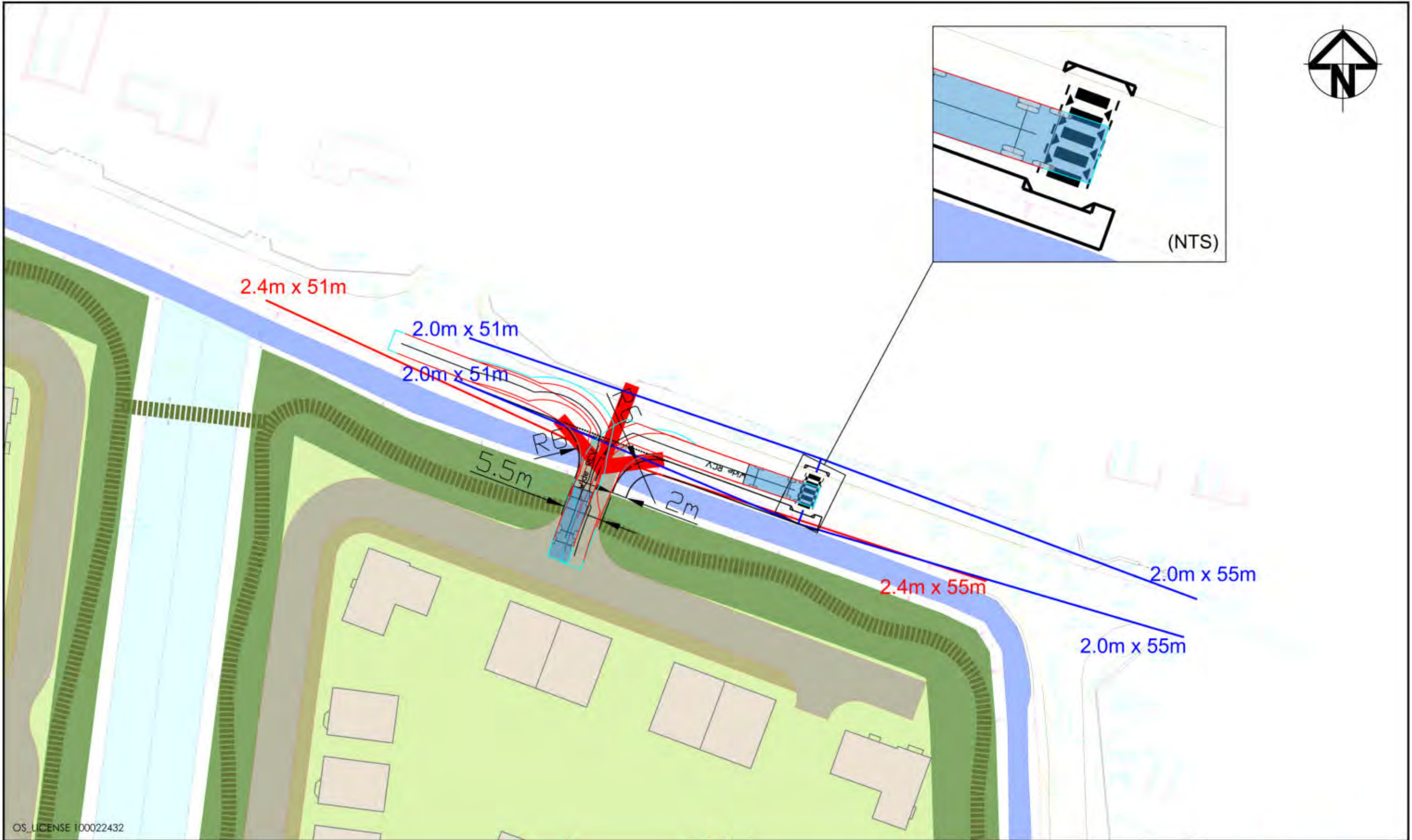
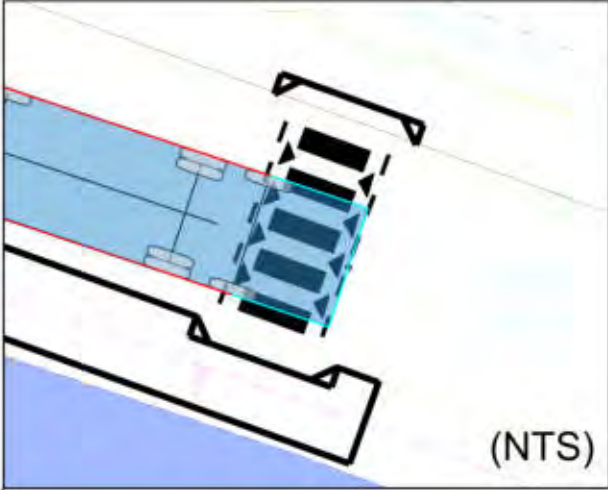
Bleadon.

Figure 5.1
Proposed Northern Access Arrangement on Bleadon Road.

SCALE: 1:500 @A3 REV -
2017-F-023-011



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T - 0117 382 0507 M - 07866 543939
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Key

- Site access visibility
- Pedestrian crossing visibility

Rev	Date	Description	EP Dm	CT Chk	CT App
-	23.07.18	ORIGINAL ISSUE			

Sutherland Legal and Property Services Ltd.

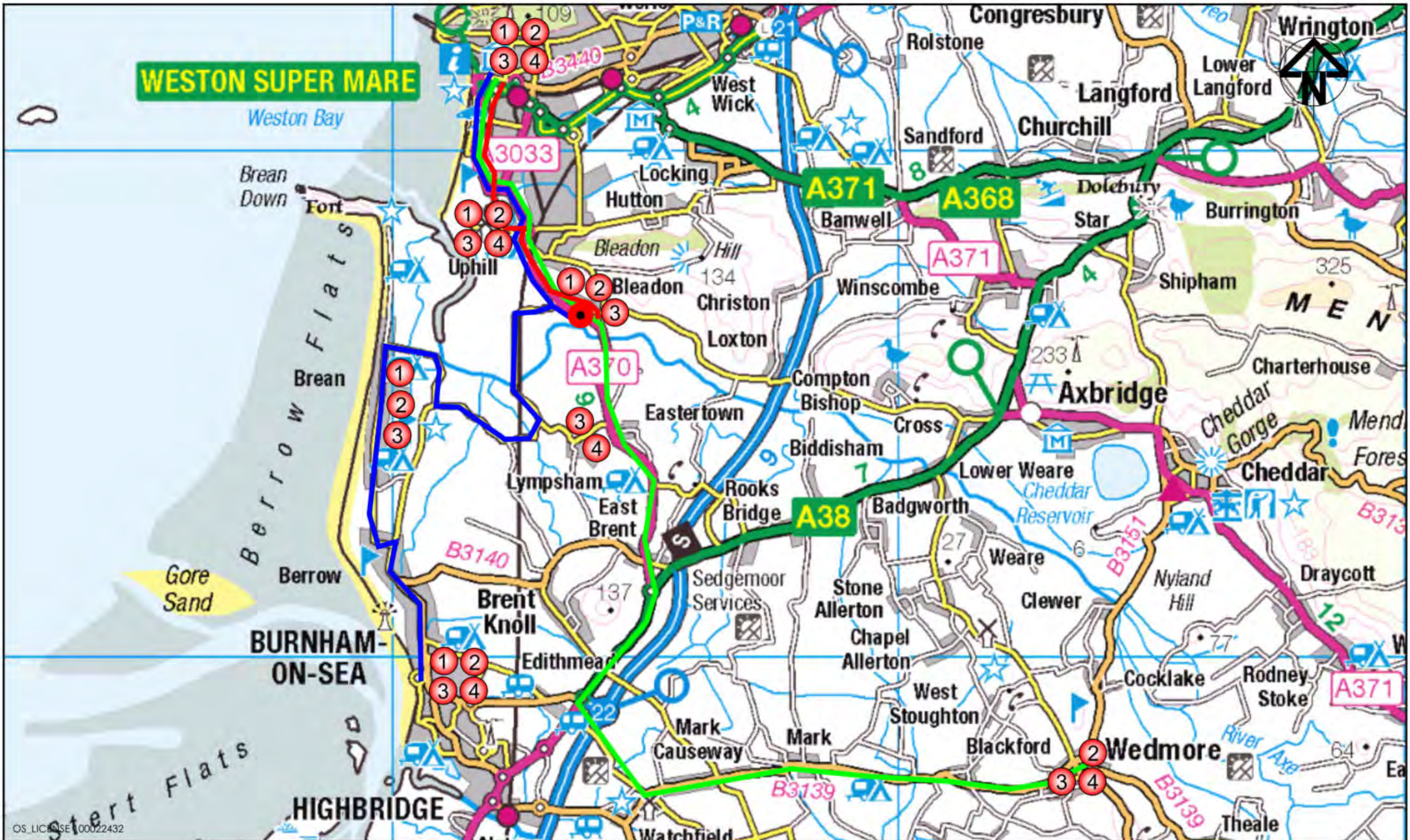
Bleadon.

Figure 6.1
Proposed North-Eastern
Access Arrangement on
Bleadon Road.

SCALE: 1:500 @A3 REV -
2017-F-023-012



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T - 0117 382 0507 M - 07866 543939
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Key

- Indicative site location
- Bus B1
- Bus 20
- Bus 754
- 1 Employment
- 2 Retail
- 3 Social / Leisure
- 4 Education

Rev	Date	Description	EP	CT	CT
-	15.11.17	ORIGINAL ISSUE	EP	CT	CT
			Dm	Chk	App

Sutherland Legal and Property Services Ltd.

Bleadon.

Figure 17.1
Facilities and Bus Route Plan.

SCALE: NTS @A3 REV -
2017-F-023-014



carl TONKS consulting
523 Horizon, Broad Wier, Bristol BS1 3DJ
T - 0117 382 0507 M - 07866 543939
www.tonks-consulting.co.uk

APPENDICES

APPENDIX A HIGHWAYS' RESPONSE

INTERNAL MEMORANDUM

FROM: D&E HIGHWAYS & TRANSPORT

Date: 31/05/18

Development Control Case Officer: David Tate

Application No: 17/P/5545/OUT
Location : Land off Bleadon Road, Bleadon, Weston-s-Mare
Proposal: Outline planning permission for the erection of up to 200 dwellings, a Health Centre, a Doctors Surgery, retail outlets and office/employment space with all matters reserved for subsequent approval.

Formal comments from Highways Development Management

The Site:

The development site comprises agricultural land to the north of the A370 Bridgwater Road, Bleadon.

The Applicant:

The applicant is seeking outline consent for the erection of up to 200 dwellings, a Health Centre, a Doctors Surgery, retail outlets and office/employment space with all matters reserved for subsequent approval.

General Observations:

Whilst the Transport Assessment and Masterplan refers to the proposed Residential, Health Centre and Local Shop uses, no specific reference is made to the proposed office / employment uses.

The application form indicates that no pre-app scoping discussions have occurred between the transport consultant and the local highway authority.

The Transport Assessment does not include any assessment of nearby committed developments (such as Bleadon Quarry to the east).

Highways Considerations:

Three points of vehicle access are proposed to the site. These are as follows, and relevant cometary is also provided.

- 1) A new priority junction with Bridgwater Road (to the south of the site). The junction would include a right-turn ghost island.

The section of Bridgwater Road which bounds the site to the south is subject to a 60mph speed limit. It is noted within the Transport Assessment that visibility at the proposed site access junction with Bridgwater Road exceeds that required by DMRB (9.0m by 215m). However, this is not demonstrated on the junction design drawing contained within the figures pack (Figure 3.1). Furthermore, no speed survey was conducted on Bridgwater Road to inform this.

The proposals would introduce another priority junction onto Bridgewater Road, in close proximity to two existing priority junctions (Bleadon Road and Bridge Road). There is no assessment included within the Transport Assessment of the likely highways safety implications of this, nor has any consideration been given to the potential for closing off one of the existing roads to traffic and enhancing connections between Bridgewater Road and Bleadon village for sustainable users such as pedestrians and cyclists.

2) A new priority junction with Bleadon Road (to the north of the site).

The Transport Assessment does not include a junction design drawing for the proposed priority junction with Bleadon Road to the north of the site. A speed survey was conducted on Bleadon Road and has shown that the 85th percentile speed of westbound routing traffic exceeds the current 30mph speed limit by 6mph (36mph result). It is not clear whether appropriate visibility onto Bleadon Road can be achieved at this junction. Furthermore, no consideration is given to the likely safety implications / mitigation resulting from additional traffic using Bleadon Road, especially in light of the high speeds that vehicles currently travel along this road.

Having regard to the location of the site, the existing speeds recorded along Bleadon Road, and the intensification of use of Bleadon Road, consideration should be given to the provision of traffic calming measures to reduce traffic speeds in the vicinity of the proposed site access.

It is essential that further detail is provided as part of the reserved matters application which demonstrates that safe means of access can be achieved from Bleadon Road.

3) A retained existing priority with Bleadon Road (to the northeast of the site).

The existing vehicle access from Bleadon Road at the northeast of the site currently takes the form an informal field access (which crosses an existing waterway). The Transport Assessment does not include a junction design drawing for the existing junction. Nor does it provide any detail of geometry, visibility, footways etc.

It is likely that the existing access would need significant upgrading if it is to serve the development.

Having regard to the location of the site, the existing speeds recorded along Bleadon Road, and the intensification of use of Bleadon Road, consideration should be given to the provision of traffic calming measures to reduce traffic speeds in the vicinity of the proposed site access

It is essential that further detail is provided as part of the reserved matters application which demonstrates that safe means of access can be achieved from Bleadon Road.

Road Safety:

The Transport Assessment assumes that 86.3% of all development traffic (62 vehicles) would turn right out of the site and travel north-westbound on Bridgewater Road towards Oldmixon and Weston-Super-Mare in the AM peak hour. To do so, vehicles exiting the site would have to conduct a right-turn manoeuvre, passing over the opposing 60mph carriageway.

In the absence of any speed surveys and / or road safety audits, there are concerns that those turning right from the site could result in a detriment to road safety along Bridgewater Road.

Trip Generation and Distribution:

Residential Trip Generation

The multi-modal trip rates used to calculate the trip generation for the proposed 200 residential units are not considered robust and do not reflect of the site's rural setting.

The residential trip generation presented in Table 4.1 of the Transport Assessment predicts:

That there will be 58 & 38 two-way pedestrian trips in the AM and PM peak hours, respectively. This is considered overestimated, as there are limited amenities and employment opportunities within walking distance of the site which future residents would realistically walk to (this is further compounded by the fact that the existing footway provision in the vicinity of the site is poor).

That there will be 141 & 130 two-way vehicle occupant trips in the AM and PM peak respectively. This is considered to be overestimated, especially when compared to the single vehicular trips also presented in Table 4.1, which are estimated as 102 trips in the AM peak hour and 104 in the PM peak hour.

The vehicle trip rates are considered low, especially given the sites rural setting and likelihood for future residents to drive.

The Transport Assessment trip generation assumes between 34% (AM peak hour) and 35% (PM peak hour) of trips would be undertaken by those driving a car. However, 2011 Census journey to work data demonstrates that 84% of local residents currently drive. Taking this into consideration, the vehicle trip rates and resultant trip generation presented in the Transport Assessment for the residential uses is not accurate and should be revised accordingly.

Health Centre & Local Shop Trip Generation

Tables 4.2 and 4.3 of the Transport Assessment include a separate trip generation assessment for the proposed Health Centre and Local Shops. Similar to the residential trip assessment, the trip rates for both land uses imply there would be a greater number of vehicle occupant trips than single vehicle trips. This is considered unrealistic.

Table 4.4 of the Transport Assessment assumes that all trips generated by the proposed Health Centre and Local Shops would be internal to the site. Whilst it is agreed that the majority of trips generated by the proposed Local Shops would be internal, this would unlikely be the case for the Health Centre (where a proportion of trips could come from the wider area).

Office Trip Generation

No specific reference is made in the Transport Assessment to the proposed office / employment uses which are indicated on the application form.

It is not clear from the Transport Assessment whether there would be any additional trips generated by the proposed office / employment uses on the site. Section 11 of the Planning Application Form (contained on the Planning Portal) identifies that there will be a total of 96 employees at the site. It is not clear what proportion, if not all of these, would be associated with the office / employment uses, and how they would travel to and from the site.

Vehicle Distribution

The Transport Assessment indicates that vehicle distribution onto the local highway network has been calculated using 2011 Census data. Whilst this is a generally accepted approach for calculating vehicle distribution for developments of this nature, no further detail is provided of the actual calculations / methodology undertaken to reach the distribution figures presented.

The distribution for the site assumes that 96.4% of traffic will route via the proposed site access junction onto the Bridgwater Road and 3.4% of traffic will route via the proposed site access junction with Bleadon Road. Further detail is required of the calculations / methodology undertaken to reach these figures.

Traffic Impact Assessments:

Presently the assessments included in the Transport Assessment are incomplete having regard to the development mix set out for the site (as specified by the application form).

An operational assessment of the proposed site access junction onto Bridgewater Road is included within the Transport Assessment. Whilst the assessment demonstrates that the proposed site access junction could accommodate the traffic associated with development proposals, further consideration is needed in light of the comments raised regarding trip generation and distribution (see above) (namely the proportion of vehicle trips generated by the site, the lack of consideration of office trips, and the proposed distribution methodology which is unclear).

Given that the site is located to the immediate south of Bleadon village, no consideration has been given to the likely cumulative impacts of existing village traffic also using the site access road to reach Bridgewater Road.

No consideration is given to committed development traffic flows and the likely cumulative impacts alongside the development proposals on the local highway network.

The Transport assessment indicates that 86.3% of all development traffic (62 vehicles in the AM peak hour) would turn right out of the site and travel north-westbound on Bridgewater Road towards Oldmixon and Weston-Super-Mare. No consideration has been given to the impacts of this additional traffic at the existing Bridgewater Road / Bleadon Hill / Uphill Road South priority crossroads junction or at the existing Bridgewater Road / Broadway / Grange Road four-arm roundabout to the northwest of the site (which are known to experience congestion during the peak hours).

Parking:

The Transport Assessment or Masterplan makes no reference to car or cycle parking provision and / or no reference as to whether these would be provided in line with North Somerset Council parking standards.

Site Layout:

The Transport Assessment and / or Masterplan make no reference to the following:

- (1) The proposed pedestrian and cycle access strategy for the site – and how the development would link into existing footways provided along the periphery, existing bus stops, and also integrate with Bleadon village to the north.
- (2) The proposed refuse collection strategy.
- (3) Whether the proposed vehicle access junctions from Bridgewater Road and Bleadon Road are suitable to accommodate a refuse vehicle / emergency vehicle / servicing vehicle. Swept path analysis would be required to support this. Details regarding the internal vehicle and pedestrian access strategy (i.e. routing, road widths etc.).
- (4) What the proposed existing access located at the northeast of the site, from Bleadon Road, would be used for, and whether it is suitable to serve the site from a design perspective.
- (5) Further details of likely TRO's required to support the proposals. For example, the Transport Assessment (paragraph 2.27) alludes to the fact that existing residents parking

along Bridge Road will be accommodated within the site – however, no further detail is provided of this (including measures to restrict future parking along Bridge Road and Bleadon Road).

Policy:

The Transport Assessment has referenced the following policy documents:

- (1) The North Somerset Core Strategy 2012;
- (2) North Somerset Replacement Local Plan (adopted 2007); and
- (3) National Planning Policy Framework (NPPF).

The North Somerset Core Strategy (2012) is now superseded by the North Somerset Core Strategy January 2017.

The following policy documents have not been considered:

- (1) West of England Joint Spatial Plan (2015) and Joint Transport Study (2016);
- (2) West of England Joint Local Transport Plan 3 (2011);
- (3) and North Somerset Council Core Strategy (2017).

Travel by Non-Car Modes:

Walking and Cycling

The Transport Assessment includes no clear pedestrian and cycle access strategy for the development.

Taking into consideration the existing intermittent footways located along the northern side of Bleadon Way and also the continuous footway located on the southern side of Bridgewater Road, existing provision for pedestrians in the vicinity of the site is generally considered to be poor.

The proposals do not identify any improvements to the existing infrastructure to accommodate future pedestrian movements associated with the development. Although the masterplan identifies potential pedestrian access points onto Bleadon Road and Bridge Road, no further detail is provided of how pedestrians would continue their journey outside of the site (especially where there are currently no footways provided along Bridge Road where it is proposed to provide two new pedestrian access points).

It is not clear from the Transport Assessment how the proposals would *‘enhance safety and convenience of access to the A370 northbound bus stop for residents of the proposed development and existing residents of Bleadon’*. Further clarity is required on this point.

The Transport Assessment does not provide any details of existing or proposed cycle infrastructure (albeit it refers to it being discussed in earlier chapters of the report in the policy chapter (6)).

The proposals do not conform to local policy requirements in that it is not demonstrated that they are accessible by sustainable modes of travel. The site would in effect become an extension to Bleadon village to the immediate north, and for this reason it is imperative that, from a sustainable transport perspective, the Transport Assessment demonstrates how the development integrates with the neighbouring village.

Public Transport

The Transport Assessment recognises that there are existing bus services available in the vicinity of the site, with the nearest being located within 10m, 420m and 900m. No detail is provided of the exact location, walk routes, and facilities available at each of the stops.

The location of the nearest bus stop is considered unrealistic, where measurement has likely been taken from the edge and not the centre of the site.

The 'Institute of Highways and Transportation – Suggested Acceptable Walking Distances' identifies 400m as an acceptable walk distance to local bus stops. Whilst the nearest stated bus stop (10m) is located within this threshold, the remaining two bus stops (420m and 900m) bus stops are located outside of this threshold.

Taking the above into account, it is considered that the site is not well served by local bus services. Furthermore the Table 2.1 Bus Service Summary is no longer correct as there has recently been a significant reduction in bus service provision. One of the main routes detailed service 4A linking Bleadon village to the town centre has been withdrawn and the service replaced by a much less frequent community transport service. The bus route service 20 from Burnham-on-Sea to Weston-s-Mare operates a much reduced frequency in the winter months from October to April whereas the summer timetable is the only one detailed.

Accessibility

Although the Transport Assessment includes a high-level review of existing local facilities and amenities no reference is made as to how these facilities would be reached on foot and / or by bike. Furthermore, it is not clear whether the existing facilities and amenities fall within the acceptable walking and cycling distances outlined by the 'Institute of Highways and Transportation – Suggested Acceptable Walking Distances' guidance and also the "comfortable cycle speed" suggested in Sustrans' Cycle Friendly Employers' Information Sheet.

No reference is made to the proximity of the site to local nurseries and schools, health care facilities, and employment opportunities, and whether these are accessible on foot or by bicycle.

The Masterplan indicates that the key community facilities (Health Centre and Local Shop) will be located at the southwestern boundary of the site, fronting onto Bridgewater Road in the vicinity of the proposed site access junction. The facilities in this location are isolated from the village core, and would likely result in residents of the village driving to the facilities as opposed to walking. In their current position, pedestrians and cyclists could be minded to try and access the facilities on foot via Bridgewater Road. At present there is no footway provided along the northern side of Bridgewater Road. Furthermore there are no formal crossing points provided. The Transport does not outline any pedestrian / cycle improvements to this effect.

Residential Travel Plan:

A Skeletal Green Travel Plan has been prepared in conjunction with the Transport Assessment. Owing to the sites rural location, and subsequent poor existing sustainable transport infrastructure, future residents are highly likely to travel via private car as opposed to using sustainable modes of travel. The Transport Assessment includes no clear pedestrian and cycle access strategy. Furthermore, it has not been demonstrated that the site is accessible via public transport. In this respect the development is considered contrary to national (NPPF) and local policy objectives.

In light of the above, and given the scale of the proposals (200 new homes), we would seek early adoption of a Residential Travel Plan in line with the North Somerset Travel Plans Supplementary Planning Document 2010. Therefore, an Interim Residential Travel Plan is needed before the planning stage to show the effectiveness in addressing the transport impacts of the development. The Interim Residential Travel Plan should include the following:

- Introduction to the site.
- Existing site specific barriers or issues for residents using sustainable travel.
- Number of trips that are expected to be generated – this has already been generated through TRICS (although it would need revising in light of the comments raised above).
- Objectives and targets.
- A management and implementation strategy including Travel Plan Coordinator.
- Measures that will encourage the shift from single occupancy car use, in favour of: walking, cycling, public transport and car sharing.
- Include the details of who will be responsible for carrying out the monitoring of the Residential Travel Plan.
- Action Plan.

The Residential Travel Plan will apply to all transport related movements and issues generated from the development. A travel survey should be undertaken within 6 months of full occupation of the development and the findings used to refine the targets set in the Interim Residential Travel Plan.

Highways will require a contribution of £120 per dwelling) towards Travel Information Packs, public transport taster tickets and cycle vouchers. This is to ensure that the development maximizes sustainable transport. Funding might also be required to improve bus services at the weekends particularly in the winter months when service provision is poor. Currently the cost to provide bus services to make some worthwhile improvements to the existing network is estimated at £20-30K per annum. It is acknowledged that if the development was fully built out revenue on public transport might be expected to increase and the subsidy to support bus services would therefore decrease.

Consideration would also need to be given to how future employees and visitors to the proposed Health Centre, Doctors Surgery, retail outlets and office/employment spaces would be encouraged to travel via sustainable modes of travel.

Construction Traffic Management Plan:

If minded for approval a Construction Traffic Management Plan would need to be approved by Highways prior to the commencement of development on site – please condition. This should include but not be limited to:

- demolition / construction programme;
- risk assessment;
- volume, type and nature of vehicles accessing the site;
- impact of demolition / construction traffic on the surrounding local highway network for network peak hours;
- provision for construction staff car parking;
- times of site operation;
- safety measures such as wheel washing facilities etc.

Recommendation:

The application has failed to demonstrate that the development is accessible via sustainable modes of travel (foot, cycle and public transport). Nor has the applicant demonstrated that the development fully integrates with the neighbouring Bleadon village.

The information provided in the Transport Assessment relating to trip generation and distribution, vehicle access, safety, and highway operation is incomplete.

Having regard to the deficiencies of the application as submitted, it is recommended that the application should be refused on the grounds i) non-compliance with the key objectives of sustainability outlined within NPPF, and ii) non-compliance with Policy DM24: Safety, traffic and provision of infrastructure, etc. associated with development of the Sites and Policies Plan Part 1.

APPENDIX B SPEED SURVEY

Bleadon - Speed Survey



Speed Limit



Weather

Thurs 28th June 2018

All speeds are recorded from free flowing vehicles

Dry/Bright

1000-1200

Northbound				Southbound			
Speeds(mph)		Speeds(mph)		Speeds(mph)		Speeds(mph)	
1	25	51	46	1	28	51	44
2	34	52	46	2	33	52	44
3	36	53	46	3	33	53	44
4	36	54	46	4	35	54	44
5	38	55	46	5	35	55	45
6	38	56	46	6	36	56	45
7	39	57	46	7	38	57	45
8	40	58	46	8	40	58	45
9	40	59	46	9	40	59	46
10	40	60	46	10	40	60	46
11	40	61	46	11	40	61	46
12	40	62	46	12	40	62	46
13	41	63	46	13	40	63	46
14	41	64	46	14	40	64	47
15	41	65	47	15	40	65	47
16	42	66	47	16	40	66	47
17	42	67	47	17	41	67	47
18	42	68	47	18	41	68	47
19	42	69	47	19	41	69	47
20	42	70	47	20	41	70	47
21	42	71	47	21	41	71	47
22	42	72	47	22	41	72	47
23	42	73	47	23	41	73	47
24	42	74	47	24	41	74	47
25	42	75	48	25	41	75	47
26	42	76	48	26	41	76	47
27	43	77	48	27	41	77	47
28	43	78	48	28	42	78	47
29	43	79	48	29	42	79	47
30	43	80	48	30	42	80	48
31	43	81	48	31	42	81	48
32	43	82	48	32	42	82	48
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35	43	85	48	35	42	85	48
36	44	86	48	36	42	86	48
37	44	87	49	37	42	87	48
38	44	88	49	38	42	88	48
39	44	89	49	39	42	89	48
40	44	90	49	40	42	90	48
41	44	91	50	41	43	91	49
42	44	92	50	42	43	92	49
43	44	93	50	43	43	93	49
44	45	94	52	44	43	94	50
45	45	95	53	45	43	95	51
46	45	96	53	46	43	96	53
47	44	97	54	47	43	97	55
48	45	98	56	48	43	98	55
49	45	99	57	49	43	99	56
50	45	100	61	50	44	100	57

ROAD SURFACE - DRY

Average Northbound	45.1	Average Southbound	44.2
85th%ile Northbound	48.0	85th%ile Southbound	48.0
% > Speed Limit Northbound	0%	% > Speed Limit Southbound	0%
% > 15mph over Speed Limit Northbound	1%	% > 15mph over Speed Limit Southbound	0%

APPENDIX C

RURAL TRICS

Calculation Reference: AUDIT-757701-180803-0825

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	2 days
	KC KENT	1 days
	SC SURREY	1 days
	WS WEST SUSSEX	1 days
06	WEST MIDLANDS	
	SH SHROPSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
 Actual Range: 23 to 805 (units:)
 Range Selected by User: 6 to 805 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/10 to 19/04/18

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Wednesday	2 days
Thursday	3 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	7 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town	7
--------------	---

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	7
------------------	---

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3	7 days
----	--------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Secondary Filtering selection (Cont.):

Population within 1 mile:

1,000 or Less	1 days
1,001 to 5,000	2 days
5,001 to 10,000	4 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	2 days
25,001 to 50,000	1 days
50,001 to 75,000	1 days
75,001 to 100,000	2 days
100,001 to 125,000	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5	7 days
------------	--------

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	2 days
No	5 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	7 days
-----------------	--------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	ES-03-A-02 SOUTH COAST ROAD PEACEHAVEN	PRIVATE HOUSING	EAST SUSSEX
	Edge of Town Residential Zone Total Number of dwellings:	37	
	Survey date: FRIDAY	18/11/11	Survey Type: MANUAL
2	ES-03-A-04 NEW LYDD ROAD CAMBER	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town Residential Zone Total Number of dwellings:	134	
	Survey date: FRIDAY	15/07/16	Survey Type: MANUAL
3	KC-03-A-07 RECVLVER ROAD HERNE BAY	MIXED HOUSES	KENT
	Edge of Town Residential Zone Total Number of dwellings:	288	
	Survey date: WEDNESDAY	27/09/17	Survey Type: MANUAL
4	NY-03-A-11 HORSEFAIR BOROUGHBRIDGE	PRIVATE HOUSING	NORTH YORKSHIRE
	Edge of Town Residential Zone Total Number of dwellings:	23	
	Survey date: WEDNESDAY	18/09/13	Survey Type: MANUAL
5	SC-03-A-04 HIGH ROAD BYFLEET	DETACHED & TERRACED	SURREY
	Edge of Town Residential Zone Total Number of dwellings:	71	
	Survey date: THURSDAY	23/01/14	Survey Type: MANUAL
6	SH-03-A-05 SANDCROFT TELFORD SUTTON HILL	SEMI-DETACHED/TERRACED	SHROPSHIRE
	Edge of Town Residential Zone Total Number of dwellings:	54	
	Survey date: THURSDAY	24/10/13	Survey Type: MANUAL
7	WS-03-A-06 ELLIS ROAD WEST HORSHAM S BROADBRIDGE HEATH	MIXED HOUSES	WEST SUSSEX
	Edge of Town Residential Zone Total Number of dwellings:	805	
	Survey date: THURSDAY	02/03/17	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
WK-03-A-02	Location too urban.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLES
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.091	7	202	0.326	7	202	0.417
08:00 - 09:00	7	202	0.161	7	202	0.405	7	202	0.566
09:00 - 10:00	7	202	0.157	7	202	0.183	7	202	0.340
10:00 - 11:00	7	202	0.125	7	202	0.159	7	202	0.284
11:00 - 12:00	7	202	0.144	7	202	0.171	7	202	0.315
12:00 - 13:00	7	202	0.157	7	202	0.151	7	202	0.308
13:00 - 14:00	7	202	0.169	7	202	0.162	7	202	0.331
14:00 - 15:00	7	202	0.172	7	202	0.175	7	202	0.347
15:00 - 16:00	7	202	0.280	7	202	0.169	7	202	0.449
16:00 - 17:00	7	202	0.277	7	202	0.165	7	202	0.442
17:00 - 18:00	7	202	0.360	7	202	0.148	7	202	0.508
18:00 - 19:00	7	202	0.332	7	202	0.188	7	202	0.520
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.425			2.402			4.827

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:	23 - 805 (units:)
Survey date date range:	01/01/10 - 19/04/18
Number of weekdays (Monday-Friday):	7
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TAXIS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.003	7	202	0.003	7	202	0.006
08:00 - 09:00	7	202	0.002	7	202	0.002	7	202	0.004
09:00 - 10:00	7	202	0.001	7	202	0.001	7	202	0.002
10:00 - 11:00	7	202	0.002	7	202	0.003	7	202	0.005
11:00 - 12:00	7	202	0.002	7	202	0.002	7	202	0.004
12:00 - 13:00	7	202	0.001	7	202	0.002	7	202	0.003
13:00 - 14:00	7	202	0.001	7	202	0.001	7	202	0.002
14:00 - 15:00	7	202	0.002	7	202	0.002	7	202	0.004
15:00 - 16:00	7	202	0.003	7	202	0.003	7	202	0.006
16:00 - 17:00	7	202	0.002	7	202	0.001	7	202	0.003
17:00 - 18:00	7	202	0.001	7	202	0.001	7	202	0.002
18:00 - 19:00	7	202	0.001	7	202	0.001	7	202	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.021			0.022			0.043

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL OGVS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.001	7	202	0.001	7	202	0.002
08:00 - 09:00	7	202	0.001	7	202	0.000	7	202	0.001
09:00 - 10:00	7	202	0.004	7	202	0.002	7	202	0.006
10:00 - 11:00	7	202	0.003	7	202	0.002	7	202	0.005
11:00 - 12:00	7	202	0.001	7	202	0.004	7	202	0.005
12:00 - 13:00	7	202	0.001	7	202	0.000	7	202	0.001
13:00 - 14:00	7	202	0.001	7	202	0.001	7	202	0.002
14:00 - 15:00	7	202	0.000	7	202	0.001	7	202	0.001
15:00 - 16:00	7	202	0.000	7	202	0.000	7	202	0.000
16:00 - 17:00	7	202	0.001	7	202	0.001	7	202	0.002
17:00 - 18:00	7	202	0.001	7	202	0.000	7	202	0.001
18:00 - 19:00	7	202	0.000	7	202	0.000	7	202	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.014			0.012			0.026

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PSVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.001	7	202	0.001	7	202	0.002
08:00 - 09:00	7	202	0.001	7	202	0.001	7	202	0.002
09:00 - 10:00	7	202	0.000	7	202	0.000	7	202	0.000
10:00 - 11:00	7	202	0.000	7	202	0.000	7	202	0.000
11:00 - 12:00	7	202	0.001	7	202	0.001	7	202	0.002
12:00 - 13:00	7	202	0.000	7	202	0.000	7	202	0.000
13:00 - 14:00	7	202	0.000	7	202	0.000	7	202	0.000
14:00 - 15:00	7	202	0.000	7	202	0.000	7	202	0.000
15:00 - 16:00	7	202	0.001	7	202	0.001	7	202	0.002
16:00 - 17:00	7	202	0.001	7	202	0.001	7	202	0.002
17:00 - 18:00	7	202	0.000	7	202	0.000	7	202	0.000
18:00 - 19:00	7	202	0.000	7	202	0.000	7	202	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.005			0.005			0.010

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL CYCLISTS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.004	7	202	0.008	7	202	0.012
08:00 - 09:00	7	202	0.001	7	202	0.007	7	202	0.008
09:00 - 10:00	7	202	0.001	7	202	0.003	7	202	0.004
10:00 - 11:00	7	202	0.000	7	202	0.001	7	202	0.001
11:00 - 12:00	7	202	0.003	7	202	0.002	7	202	0.005
12:00 - 13:00	7	202	0.000	7	202	0.004	7	202	0.004
13:00 - 14:00	7	202	0.003	7	202	0.006	7	202	0.009
14:00 - 15:00	7	202	0.002	7	202	0.001	7	202	0.003
15:00 - 16:00	7	202	0.004	7	202	0.003	7	202	0.007
16:00 - 17:00	7	202	0.010	7	202	0.009	7	202	0.019
17:00 - 18:00	7	202	0.013	7	202	0.011	7	202	0.024
18:00 - 19:00	7	202	0.006	7	202	0.004	7	202	0.010
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.047			0.059			0.106

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLE OCCUPANTS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.120	7	202	0.451	7	202	0.571
08:00 - 09:00	7	202	0.217	7	202	0.703	7	202	0.920
09:00 - 10:00	7	202	0.193	7	202	0.249	7	202	0.442
10:00 - 11:00	7	202	0.157	7	202	0.213	7	202	0.370
11:00 - 12:00	7	202	0.193	7	202	0.249	7	202	0.442
12:00 - 13:00	7	202	0.210	7	202	0.210	7	202	0.420
13:00 - 14:00	7	202	0.238	7	202	0.222	7	202	0.460
14:00 - 15:00	7	202	0.237	7	202	0.242	7	202	0.479
15:00 - 16:00	7	202	0.506	7	202	0.235	7	202	0.741
16:00 - 17:00	7	202	0.447	7	202	0.242	7	202	0.689
17:00 - 18:00	7	202	0.539	7	202	0.226	7	202	0.765
18:00 - 19:00	7	202	0.461	7	202	0.293	7	202	0.754
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.518			3.535			7.053

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PEDESTRIANS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.013	7	202	0.025	7	202	0.038
08:00 - 09:00	7	202	0.025	7	202	0.120	7	202	0.145
09:00 - 10:00	7	202	0.041	7	202	0.046	7	202	0.087
10:00 - 11:00	7	202	0.042	7	202	0.049	7	202	0.091
11:00 - 12:00	7	202	0.032	7	202	0.031	7	202	0.063
12:00 - 13:00	7	202	0.040	7	202	0.045	7	202	0.085
13:00 - 14:00	7	202	0.041	7	202	0.023	7	202	0.064
14:00 - 15:00	7	202	0.028	7	202	0.042	7	202	0.070
15:00 - 16:00	7	202	0.133	7	202	0.055	7	202	0.188
16:00 - 17:00	7	202	0.072	7	202	0.052	7	202	0.124
17:00 - 18:00	7	202	0.074	7	202	0.047	7	202	0.121
18:00 - 19:00	7	202	0.051	7	202	0.044	7	202	0.095
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.592			0.579			1.171

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL BUS/TRAM PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.001	7	202	0.008	7	202	0.009
08:00 - 09:00	7	202	0.000	7	202	0.019	7	202	0.019
09:00 - 10:00	7	202	0.000	7	202	0.007	7	202	0.007
10:00 - 11:00	7	202	0.002	7	202	0.004	7	202	0.006
11:00 - 12:00	7	202	0.000	7	202	0.005	7	202	0.005
12:00 - 13:00	7	202	0.001	7	202	0.002	7	202	0.003
13:00 - 14:00	7	202	0.006	7	202	0.002	7	202	0.008
14:00 - 15:00	7	202	0.003	7	202	0.001	7	202	0.004
15:00 - 16:00	7	202	0.008	7	202	0.006	7	202	0.014
16:00 - 17:00	7	202	0.009	7	202	0.006	7	202	0.015
17:00 - 18:00	7	202	0.013	7	202	0.003	7	202	0.016
18:00 - 19:00	7	202	0.019	7	202	0.007	7	202	0.026
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.062			0.070			0.132

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TOTAL RAIL PASSENGERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.000	7	202	0.002	7	202	0.002
08:00 - 09:00	7	202	0.000	7	202	0.007	7	202	0.007
09:00 - 10:00	7	202	0.000	7	202	0.001	7	202	0.001
10:00 - 11:00	7	202	0.000	7	202	0.001	7	202	0.001
11:00 - 12:00	7	202	0.000	7	202	0.000	7	202	0.000
12:00 - 13:00	7	202	0.000	7	202	0.001	7	202	0.001
13:00 - 14:00	7	202	0.001	7	202	0.000	7	202	0.001
14:00 - 15:00	7	202	0.000	7	202	0.000	7	202	0.000
15:00 - 16:00	7	202	0.001	7	202	0.001	7	202	0.002
16:00 - 17:00	7	202	0.002	7	202	0.001	7	202	0.003
17:00 - 18:00	7	202	0.004	7	202	0.000	7	202	0.004
18:00 - 19:00	7	202	0.006	7	202	0.001	7	202	0.007
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.014			0.015			0.029

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL COACH PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.000	7	202	0.001	7	202	0.001
08:00 - 09:00	7	202	0.000	7	202	0.001	7	202	0.001
09:00 - 10:00	7	202	0.000	7	202	0.000	7	202	0.000
10:00 - 11:00	7	202	0.000	7	202	0.000	7	202	0.000
11:00 - 12:00	7	202	0.000	7	202	0.000	7	202	0.000
12:00 - 13:00	7	202	0.000	7	202	0.000	7	202	0.000
13:00 - 14:00	7	202	0.000	7	202	0.000	7	202	0.000
14:00 - 15:00	7	202	0.000	7	202	0.000	7	202	0.000
15:00 - 16:00	7	202	0.001	7	202	0.000	7	202	0.001
16:00 - 17:00	7	202	0.001	7	202	0.000	7	202	0.001
17:00 - 18:00	7	202	0.000	7	202	0.000	7	202	0.000
18:00 - 19:00	7	202	0.000	7	202	0.000	7	202	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.002			0.002			0.004

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL PUBLIC TRANSPORT USERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.001	7	202	0.011	7	202	0.012
08:00 - 09:00	7	202	0.000	7	202	0.027	7	202	0.027
09:00 - 10:00	7	202	0.000	7	202	0.008	7	202	0.008
10:00 - 11:00	7	202	0.002	7	202	0.004	7	202	0.006
11:00 - 12:00	7	202	0.000	7	202	0.005	7	202	0.005
12:00 - 13:00	7	202	0.001	7	202	0.003	7	202	0.004
13:00 - 14:00	7	202	0.007	7	202	0.002	7	202	0.009
14:00 - 15:00	7	202	0.003	7	202	0.001	7	202	0.004
15:00 - 16:00	7	202	0.011	7	202	0.008	7	202	0.019
16:00 - 17:00	7	202	0.012	7	202	0.006	7	202	0.018
17:00 - 18:00	7	202	0.018	7	202	0.003	7	202	0.021
18:00 - 19:00	7	202	0.025	7	202	0.008	7	202	0.033
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.080			0.086			0.166

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL PEOPLE

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	202	0.137	7	202	0.496	7	202	0.633
08:00 - 09:00	7	202	0.242	7	202	0.856	7	202	1.098
09:00 - 10:00	7	202	0.235	7	202	0.306	7	202	0.541
10:00 - 11:00	7	202	0.200	7	202	0.268	7	202	0.468
11:00 - 12:00	7	202	0.228	7	202	0.288	7	202	0.516
12:00 - 13:00	7	202	0.251	7	202	0.261	7	202	0.512
13:00 - 14:00	7	202	0.289	7	202	0.253	7	202	0.542
14:00 - 15:00	7	202	0.270	7	202	0.286	7	202	0.556
15:00 - 16:00	7	202	0.654	7	202	0.301	7	202	0.955
16:00 - 17:00	7	202	0.541	7	202	0.309	7	202	0.850
17:00 - 18:00	7	202	0.644	7	202	0.287	7	202	0.931
18:00 - 19:00	7	202	0.542	7	202	0.350	7	202	0.892
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			4.233			4.261			8.494

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

APPENDIX D

RE-ASSESSED TRICS

Calculation Reference: AUDIT-757701-180803-0820

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	HC HAMPSHIRE	1 days
	WS WEST SUSSEX	1 days
03	SOUTH WEST	
	DV DEVON	1 days
04	EAST ANGLIA	
	NF NORFOLK	2 days
05	EAST MIDLANDS	
	LN LINCOLNSHIRE	1 days
06	WEST MIDLANDS	
	SH SHROPSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	2 days
08	NORTH WEST	
	CH CHESHIRE	1 days
10	WALES	
	PS POWYS	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
 Actual Range: 11 to 108 (units:)
 Range Selected by User: 11 to 108 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 11/06/09 to 27/11/17

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	5 days
Tuesday	4 days
Wednesday	1 days
Thursday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	11 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre) 11

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	10
No Sub Category	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 11 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,001 to 5,000	1 days
5,001 to 10,000	3 days
10,001 to 15,000	3 days
15,001 to 20,000	2 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	2 days
25,001 to 50,000	1 days
50,001 to 75,000	1 days
75,001 to 100,000	3 days
100,001 to 125,000	1 days
125,001 to 250,000	3 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	3 days
1.1 to 1.5	8 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	2 days
No	9 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	11 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	CH-03-A-08 WHITCHURCH ROAD CHESTER BOUGHTON HEATH Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 11 <i>Survey date: TUESDAY 22/05/12</i>	DETACHED	CHESHIRE	<i>Survey Type: MANUAL</i>
2	DV-03-A-03 LOWER BRAND LANE HONITON Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 70 <i>Survey date: MONDAY 28/09/15</i>	TERRACED & SEMI DETACHED	DEVON	<i>Survey Type: MANUAL</i>
3	HC-03-A-18 CANADA WAY LIPHOOK Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 62 <i>Survey date: TUESDAY 29/11/16</i>	HOUSES & FLATS	HAMPSHIRE	<i>Survey Type: MANUAL</i>
4	LN-03-A-03 ROOKERY LANE LINCOLN BOULTHAM Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 22 <i>Survey date: TUESDAY 18/09/12</i>	SEMI DETACHED	LINCOLNSHIRE	<i>Survey Type: MANUAL</i>
5	NF-03-A-01 YARMOUTH ROAD CAISTER-ON-SEA Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 27 <i>Survey date: TUESDAY 16/10/12</i>	SEMI DET. & BUNGALOWS	NORFOLK	<i>Survey Type: MANUAL</i>
6	NF-03-A-02 DEREHAM ROAD NORWICH Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 98 <i>Survey date: MONDAY 22/10/12</i>	HOUSES & FLATS	NORFOLK	<i>Survey Type: MANUAL</i>
7	NY-03-A-08 NICHOLAS STREET YORK Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 21 <i>Survey date: MONDAY 16/09/13</i>	TERRACED HOUSES	NORTH YORKSHIRE	<i>Survey Type: MANUAL</i>
8	NY-03-A-09 GRAMMAR SCHOOL LANE NORTHALLERTON Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 52 <i>Survey date: MONDAY 16/09/13</i>	MIXED HOUSING	NORTH YORKSHIRE	<i>Survey Type: MANUAL</i>

LIST OF SITES relevant to selection parameters (Cont.)

9	PS-03-A-02 GUNROG ROAD WELSHPOOL	DETACHED/SEMI -DETACHED		POWYS
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 28 <i>Survey date: MONDAY 11/05/15</i>			
	<i>Survey Type: MANUAL</i>			
10	SH-03-A-04 ST MICHAEL'S STREET SHREWSBURY	TERRACED		SHROPSHIRE
	Suburban Area (PPS6 Out of Centre) No Sub Category Total Number of dwellings: 108 <i>Survey date: THURSDAY 11/06/09</i>			
	<i>Survey Type: MANUAL</i>			
11	WS-03-A-05 UPPER SHOREHAM ROAD SHOREHAM BY SEA	TERRACED & FLATS		WEST SUSSEX
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 48 <i>Survey date: WEDNESDAY 18/04/12</i>			
	<i>Survey Type: MANUAL</i>			

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
CA-03-A-05	Not in original selection
DH-03-A-01	Not in original selection
HC-03-A-19	Not in original selection
KC-03-A-03	Not in original selection

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.073	11	50	0.355	11	50	0.428
08:00 - 09:00	11	50	0.148	11	50	0.362	11	50	0.510
09:00 - 10:00	11	50	0.139	11	50	0.159	11	50	0.298
10:00 - 11:00	11	50	0.115	11	50	0.130	11	50	0.245
11:00 - 12:00	11	50	0.152	11	50	0.139	11	50	0.291
12:00 - 13:00	11	50	0.144	11	50	0.128	11	50	0.272
13:00 - 14:00	11	50	0.132	11	50	0.126	11	50	0.258
14:00 - 15:00	11	50	0.135	11	50	0.172	11	50	0.307
15:00 - 16:00	11	50	0.216	11	50	0.155	11	50	0.371
16:00 - 17:00	11	50	0.276	11	50	0.186	11	50	0.462
17:00 - 18:00	11	50	0.346	11	50	0.177	11	50	0.523
18:00 - 19:00	11	50	0.234	11	50	0.163	11	50	0.397
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.110			2.252			4.362

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	11 - 108 (units:)
Survey date date range:	11/06/09 - 27/11/17
Number of weekdays (Monday-Friday):	11
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	1
Surveys manually removed from selection:	4

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TAXIS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.000	11	50	0.000	11	50	0.000
08:00 - 09:00	11	50	0.004	11	50	0.004	11	50	0.008
09:00 - 10:00	11	50	0.004	11	50	0.002	11	50	0.006
10:00 - 11:00	11	50	0.002	11	50	0.002	11	50	0.004
11:00 - 12:00	11	50	0.000	11	50	0.000	11	50	0.000
12:00 - 13:00	11	50	0.000	11	50	0.000	11	50	0.000
13:00 - 14:00	11	50	0.000	11	50	0.000	11	50	0.000
14:00 - 15:00	11	50	0.002	11	50	0.002	11	50	0.004
15:00 - 16:00	11	50	0.002	11	50	0.000	11	50	0.002
16:00 - 17:00	11	50	0.000	11	50	0.004	11	50	0.004
17:00 - 18:00	11	50	0.002	11	50	0.002	11	50	0.004
18:00 - 19:00	11	50	0.000	11	50	0.000	11	50	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.016			0.016			0.032

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL OGVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.000	11	50	0.000	11	50	0.000
08:00 - 09:00	11	50	0.002	11	50	0.000	11	50	0.002
09:00 - 10:00	11	50	0.004	11	50	0.005	11	50	0.009
10:00 - 11:00	11	50	0.000	11	50	0.000	11	50	0.000
11:00 - 12:00	11	50	0.004	11	50	0.004	11	50	0.008
12:00 - 13:00	11	50	0.005	11	50	0.002	11	50	0.007
13:00 - 14:00	11	50	0.005	11	50	0.009	11	50	0.014
14:00 - 15:00	11	50	0.002	11	50	0.002	11	50	0.004
15:00 - 16:00	11	50	0.000	11	50	0.000	11	50	0.000
16:00 - 17:00	11	50	0.002	11	50	0.002	11	50	0.004
17:00 - 18:00	11	50	0.002	11	50	0.002	11	50	0.004
18:00 - 19:00	11	50	0.000	11	50	0.000	11	50	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.026			0.026			0.052

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL CYCLISTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.004	11	50	0.024	11	50	0.028
08:00 - 09:00	11	50	0.002	11	50	0.018	11	50	0.020
09:00 - 10:00	11	50	0.002	11	50	0.011	11	50	0.013
10:00 - 11:00	11	50	0.005	11	50	0.009	11	50	0.014
11:00 - 12:00	11	50	0.004	11	50	0.005	11	50	0.009
12:00 - 13:00	11	50	0.011	11	50	0.004	11	50	0.015
13:00 - 14:00	11	50	0.005	11	50	0.000	11	50	0.005
14:00 - 15:00	11	50	0.004	11	50	0.009	11	50	0.013
15:00 - 16:00	11	50	0.016	11	50	0.005	11	50	0.021
16:00 - 17:00	11	50	0.022	11	50	0.007	11	50	0.029
17:00 - 18:00	11	50	0.033	11	50	0.011	11	50	0.044
18:00 - 19:00	11	50	0.009	11	50	0.009	11	50	0.018
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.117			0.112			0.229

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL VEHICLE OCCUPANTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.091	11	50	0.413	11	50	0.504
08:00 - 09:00	11	50	0.188	11	50	0.514	11	50	0.702
09:00 - 10:00	11	50	0.159	11	50	0.203	11	50	0.362
10:00 - 11:00	11	50	0.154	11	50	0.168	11	50	0.322
11:00 - 12:00	11	50	0.190	11	50	0.185	11	50	0.375
12:00 - 13:00	11	50	0.190	11	50	0.177	11	50	0.367
13:00 - 14:00	11	50	0.179	11	50	0.192	11	50	0.371
14:00 - 15:00	11	50	0.174	11	50	0.221	11	50	0.395
15:00 - 16:00	11	50	0.335	11	50	0.203	11	50	0.538
16:00 - 17:00	11	50	0.399	11	50	0.241	11	50	0.640
17:00 - 18:00	11	50	0.446	11	50	0.207	11	50	0.653
18:00 - 19:00	11	50	0.296	11	50	0.223	11	50	0.519
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.801			2.947			5.748

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PEDESTRIANS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.013	11	50	0.113	11	50	0.126
08:00 - 09:00	11	50	0.051	11	50	0.238	11	50	0.289
09:00 - 10:00	11	50	0.084	11	50	0.059	11	50	0.143
10:00 - 11:00	11	50	0.040	11	50	0.055	11	50	0.095
11:00 - 12:00	11	50	0.044	11	50	0.046	11	50	0.090
12:00 - 13:00	11	50	0.068	11	50	0.035	11	50	0.103
13:00 - 14:00	11	50	0.059	11	50	0.079	11	50	0.138
14:00 - 15:00	11	50	0.040	11	50	0.066	11	50	0.106
15:00 - 16:00	11	50	0.163	11	50	0.095	11	50	0.258
16:00 - 17:00	11	50	0.133	11	50	0.057	11	50	0.190
17:00 - 18:00	11	50	0.146	11	50	0.044	11	50	0.190
18:00 - 19:00	11	50	0.071	11	50	0.064	11	50	0.135
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.912			0.951			1.863

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL BUS/TRAM PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.002	11	50	0.015	11	50	0.017
08:00 - 09:00	11	50	0.002	11	50	0.009	11	50	0.011
09:00 - 10:00	11	50	0.002	11	50	0.005	11	50	0.007
10:00 - 11:00	11	50	0.002	11	50	0.005	11	50	0.007
11:00 - 12:00	11	50	0.004	11	50	0.002	11	50	0.006
12:00 - 13:00	11	50	0.005	11	50	0.007	11	50	0.012
13:00 - 14:00	11	50	0.004	11	50	0.002	11	50	0.006
14:00 - 15:00	11	50	0.009	11	50	0.005	11	50	0.014
15:00 - 16:00	11	50	0.004	11	50	0.004	11	50	0.008
16:00 - 17:00	11	50	0.004	11	50	0.002	11	50	0.006
17:00 - 18:00	11	50	0.022	11	50	0.004	11	50	0.026
18:00 - 19:00	11	50	0.018	11	50	0.000	11	50	0.018
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.078			0.060			0.138

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL TOTAL RAIL PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.000	11	50	0.026	11	50	0.026
08:00 - 09:00	11	50	0.000	11	50	0.007	11	50	0.007
09:00 - 10:00	11	50	0.000	11	50	0.004	11	50	0.004
10:00 - 11:00	11	50	0.000	11	50	0.002	11	50	0.002
11:00 - 12:00	11	50	0.000	11	50	0.002	11	50	0.002
12:00 - 13:00	11	50	0.000	11	50	0.002	11	50	0.002
13:00 - 14:00	11	50	0.000	11	50	0.000	11	50	0.000
14:00 - 15:00	11	50	0.002	11	50	0.002	11	50	0.004
15:00 - 16:00	11	50	0.000	11	50	0.005	11	50	0.005
16:00 - 17:00	11	50	0.002	11	50	0.000	11	50	0.002
17:00 - 18:00	11	50	0.011	11	50	0.000	11	50	0.011
18:00 - 19:00	11	50	0.013	11	50	0.002	11	50	0.015
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.028			0.052			0.080

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL PUBLIC TRANSPORT USERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.002	11	50	0.040	11	50	0.042
08:00 - 09:00	11	50	0.002	11	50	0.016	11	50	0.018
09:00 - 10:00	11	50	0.002	11	50	0.009	11	50	0.011
10:00 - 11:00	11	50	0.002	11	50	0.007	11	50	0.009
11:00 - 12:00	11	50	0.004	11	50	0.004	11	50	0.008
12:00 - 13:00	11	50	0.005	11	50	0.009	11	50	0.014
13:00 - 14:00	11	50	0.004	11	50	0.002	11	50	0.006
14:00 - 15:00	11	50	0.011	11	50	0.007	11	50	0.018
15:00 - 16:00	11	50	0.004	11	50	0.009	11	50	0.013
16:00 - 17:00	11	50	0.005	11	50	0.002	11	50	0.007
17:00 - 18:00	11	50	0.033	11	50	0.004	11	50	0.037
18:00 - 19:00	11	50	0.031	11	50	0.002	11	50	0.033
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.105			0.111			0.216

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL TOTAL PEOPLE

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	50	0.110	11	50	0.590	11	50	0.700
08:00 - 09:00	11	50	0.243	11	50	0.786	11	50	1.029
09:00 - 10:00	11	50	0.247	11	50	0.282	11	50	0.529
10:00 - 11:00	11	50	0.201	11	50	0.239	11	50	0.440
11:00 - 12:00	11	50	0.241	11	50	0.239	11	50	0.480
12:00 - 13:00	11	50	0.274	11	50	0.225	11	50	0.499
13:00 - 14:00	11	50	0.247	11	50	0.272	11	50	0.519
14:00 - 15:00	11	50	0.229	11	50	0.303	11	50	0.532
15:00 - 16:00	11	50	0.517	11	50	0.313	11	50	0.830
16:00 - 17:00	11	50	0.559	11	50	0.307	11	50	0.866
17:00 - 18:00	11	50	0.658	11	50	0.265	11	50	0.923
18:00 - 19:00	11	50	0.408	11	50	0.298	11	50	0.706
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.934			4.119			8.053

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

APPENDIX E

CENSUS CALCULATIONS

WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)

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population
units
date
usual residence

All usual residents aged 16 and over in employment the week before the census
Persons
2011
E02003087 : North Somerset 023 (2011 super output area - middle layer)

place of work : 2011 super output area - middle layer	Distribution from site	Distribution No.s (vehicles)	Distribution (%)	Total Vehicles	Taxi	Motorcycle, scooter or moped	Driving a car or van
E02002985 : Bath and North East Somerset 001	E			3	0	0	3
E02002987 : Bath and North East Somerset 003	E			3	0	0	3
E02002991 : Bath and North East Somerset 007	E			4	0	0	4
E02002992 : Bath and North East Somerset 008	E			3	0	0	3
E02002995 : Bath and North East Somerset 011	E			2	0	0	2
E02002996 : Bath and North East Somerset 012	E			2	0	0	2
E02003004 : Bath and North East Somerset 020	E			1	0	0	1
E02003005 : Bath and North East Somerset 021	E			6	0	0	6
E02003006 : Bath and North East Somerset 022	E			1	0	0	1
E02003007 : Bath and North East Somerset 023	E			1	0	0	1
E02003009 : Bath and North East Somerset 025	E			2	0	0	2
E02003011 : Bath and North East Somerset 027	E			1	0	0	1
E02003077 : North Somerset 013	E			1	0	0	1
E02002554 : Stockton-on-Tees 020	NW			1	0	0	1
E02001790 : South Tyneside 023	NW			1	0	0	1
E02001097 : Manchester 053	NW			2	0	0	2
E02001185 : Salford 029	NW			1	0	0	1
E02002251 : Calderdale 008	NW			6	0	0	6
E02002268 : Calderdale 025	NW			1	0	0	1
E02006904 : Nottingham 039	NW			1	0	0	1
E02006905 : Nottingham 040	NW			1	0	0	1
E02004089 : Erewash 012	NW			1	0	0	1
E02005338 : Blaby 006	NW			1	0	0	1
E02005376 : Harborough 010	NW			3	0	0	3
E02005387 : Hinckley and Bosworth 011	NW			1	0	0	1
E02005389 : Hinckley and Bosworth 013	NW			1	0	0	1
E02005406 : North West Leicestershire 010	NW			2	0	1	1
E02005683 : South Northamptonshire 003	NW			1	0	0	1
E02005696 : Wellingborough 005	NW			1	0	0	1
E02002905 : Herefordshire 001	NW			1	0	0	1
E02006150 : Lichfield 005	NW			1	0	0	1
E02006470 : North Warwickshire 003	NW			1	0	0	1
E02006526 : Warwick 008	NW			1	0	0	1
E02001965 : Coventry 008	NW			1	0	0	1
E02002033 : Dudley 034	NW			1	0	0	1
E02002060 : Sandwell 018	NW			1	0	0	1
E02002089 : Solihull 009	NW			1	0	0	1
E02002098 : Solihull 016	NW			1	0	0	1
E02002136 : Walsall 027	NW			1	0	0	1
E02006720 : Malvern Hills 011	NW			1	0	0	1
E02006727 : Redditch 007	NW			1	0	0	1
E02006740 : Worcester 007	NW			1	0	0	1
E02006763 : Wychavon 016	NW			1	0	0	1
E02003271 : Luton 014	NW			1	0	0	1
E02003303 : Thurrock 008	NW			1	0	0	1
E02003310 : Thurrock 015	NW			1	0	0	1
E02004470 : Brentwood 007	NW			1	0	0	1
E02004596 : Uttlesford 006	NW			1	0	0	1
E02004976 : Watford 009	NW			1	0	0	1
E02004989 : Welwyn Hatfield 010	NW			1	0	0	1
E02000192 : Camden 027	NW			1	0	0	1
E02000824 : Southwark 018	NW			1	0	0	1
E02000933 : Wandsworth 011	NW			1	0	0	1
E02000980 : Westminster 021	NW			1	0	0	1
E02000049 : Barnet 026	NW			2	0	0	2
E02000092 : Bexley 028	NW			1	0	0	1
E02000252 : Ealing 015	NW			1	0	0	1
E02000518 : Hillingdon 025	NW			1	0	0	1
E02000521 : Hillingdon 026	NW			1	0	0	1
E02003531 : Portsmouth 008	NW			1	0	0	1
E02003405 : Reading 017	NW			2	0	0	2
E02003557 : Southampton 009	NW			1	0	0	1
E02003663 : Aylesbury Vale 012	NW			1	0	0	1
E02003667 : Aylesbury Vale 016	NW			1	0	0	1
E02003675 : Aylesbury Vale 024	NW			1	0	0	1
E02003703 : Wycombe 008	NW			1	0	0	1
E02003711 : Wycombe 016	NW			1	0	0	1
E02004685 : Basingstoke and Deane 011	NW			1	0	0	1
E02004702 : East Hampshire 006	NW			1	0	0	1
E02004756 : Hart 006	NW			1	0	0	1
E02004761 : Hart 011	NW			1	0	0	1
E02004807 : Rushmoor 006	NW			1	0	0	1
E02004808 : Rushmoor 007	NW			1	0	0	1
E02004841 : Winchester 013	NW			1	0	0	1
E02005028 : Dartford 001	NW			1	0	0	1
E02005091 : Sevenoaks 005	NW			1	0	0	1
E02005125 : Swale 011	NW			1	0	0	1
E02005958 : South Oxfordshire 001	NW			1	0	0	1
E02005991 : Vale of White Horse 014	NW			1	0	0	1
E02005998 : West Oxfordshire 006	NW			1	0	0	1
E02006384 : Reigate and Banstead 010	NW			1	0	0	1
E02006395 : Runnymede 003	NW			1	0	0	1
E02006408 : Spelthorne 006	NW			1	0	0	1
E02006570 : Chichester 010	NW			1	0	0	1
E02006578 : Crawley 004	NW			2	0	0	2
E02006602 : Horsham 015	NW			3	0	0	3
E02006609 : Mid Sussex 006	NW			1	0	0	1
E02003012 : Bristol 001	NW			2	0	0	2
E02003013 : Bristol 002	NW			2	0	0	2
E02003014 : Bristol 003	NW			31	0	1	30
E02003015 : Bristol 004	NW			3	0	0	3
E02003016 : Bristol 005	NW			1	0	0	1
E02003017 : Bristol 006	NW			2	0	0	2
E02003019 : Bristol 008	NW			31	1	1	29
E02003020 : Bristol 009	NW			2	0	0	2
E02003021 : Bristol 010	NW			3	0	0	3
E02003024 : Bristol 013	NW			2	0	0	2
E02003025 : Bristol 014	NW			1	0	0	1
E02003026 : Bristol 015	NW			4	0	0	4
E02003027 : Bristol 016	NW			3	0	0	3
E02003028 : Bristol 017	NW			3	0	0	3
E02003029 : Bristol 018	NW			1	0	0	1
E02003031 : Bristol 020	NW			5	0	0	5
E02003032 : Bristol 021	NW			3	0	0	3
E02003033 : Bristol 022	NW			2	0	0	2
E02003034 : Bristol 023	NW			8	0	1	7
E02003036 : Bristol 025	NW			6	0	1	5
E02003037 : Bristol 026	NW			7	0	0	7
E02003038 : Bristol 027	NW			1	0	0	1
E02003039 : Bristol 028	NW			1	0	0	1
E02003040 : Bristol 029	NW			3	0	0	3

E02003165 : Torbay 012	SE	1	0	0	1
E02003167 : Torbay 014	SE	1	0	0	1
E02004134 : East Devon 006	SE	1	0	0	1
E02004142 : East Devon 014	SE	1	0	0	1
E02004156 : Exeter 008	SE	1	0	0	1
E02004159 : Exeter 011	SE	2	0	0	2
E02004162 : Exeter 014	SE	2	0	0	2
E02004169 : Mid Devon 006	SE	2	0	0	2
E02004170 : Mid Devon 007	SE	1	0	0	1
E02004179 : North Devon 005	SE	1	0	0	1
E02004189 : South Hams 001	SE	1	0	0	1
E02004223 : Torridge 004	SE	2	0	0	2
E02004265 : Purbeck 003	SE	1	0	0	1
E02004269 : West Dorset 001	SE	1	0	0	1
E02006047 : Mendip 001	SE	2	0	0	2
E02006048 : Mendip 002	SE	2	0	0	2
E02006051 : Mendip 005	SE	3	0	0	3
E02006052 : Mendip 006	SE	5	0	0	5
E02006054 : Mendip 008	SE	8	0	0	8
E02006055 : Mendip 009	SE	2	0	0	2
E02006056 : Mendip 010	SE	1	0	0	1
E02006057 : Mendip 011	SE	2	0	0	2
E02006058 : Mendip 012	SE	1	0	0	1
E02006060 : Mendip 014	SE	4	0	0	4
E02006061 : Sedgemoor 001	SE	45	0	2	43
E02006062 : Sedgemoor 002	SE	31	0	2	29
E02006063 : Sedgemoor 003	SE	22	0	2	20
E02006064 : Sedgemoor 004	SE	10	0	0	10
E02006065 : Sedgemoor 005	SE	37	0	2	35
E02006066 : Sedgemoor 006	SE	4	0	0	4
E02006067 : Sedgemoor 007	SE	6	0	0	6
E02006068 : Sedgemoor 008	SE	4	0	0	4
E02006069 : Sedgemoor 009	SE	7	0	0	7
E02006070 : Sedgemoor 010	SE	4	0	0	4
E02006071 : Sedgemoor 011	SE	1	0	0	1
E02006072 : Sedgemoor 012	SE	3	0	0	3
E02006073 : Sedgemoor 013	SE	0	0	0	0
E02006074 : Sedgemoor 014	SE	6	0	0	6
E02006076 : South Somerset 002	SE	2	0	0	2
E02006080 : South Somerset 006	SE	2	0	0	2
E02006084 : South Somerset 010	SE	1	0	0	1
E02006085 : South Somerset 011	SE	2	0	0	2
E02006086 : South Somerset 012	SE	1	0	0	1
E02006087 : South Somerset 013	SE	2	0	0	2
E02006092 : South Somerset 018	SE	7	0	0	7
E02006100 : Taunton Deane 002	SE	4	0	0	4
E02006102 : Taunton Deane 004	SE	2	0	0	2
E02006104 : Taunton Deane 006	SE	5	0	0	5
E02006105 : Taunton Deane 007	SE	2	0	0	2
E02006107 : Taunton Deane 009	SE	3	0	0	3
E02006108 : Taunton Deane 010	SE	8	0	0	8
E02006109 : Taunton Deane 011	SE	5	0	0	5
E02006111 : Taunton Deane 013	SE	2	0	0	2
E02006116 : West Somerset 004	SE	1	0	0	1
E02006117 : West Somerset 005	SE	1	0	0	1
	SE	285	10.3		

Check 100.0

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

APPENDIX F

PICADY OUTPUT

Junctions 9
PICADY 9 - Priority Intersection Module
Version: 9.0.1.4646 [] © Copyright TRL Limited, 2018
For sales and distribution information, program advice and maintenance, contact TRL: Tel: +44 (0)1344 770758 email: software@trl.co.uk Web: http://www.trlsoftware.co.uk
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Filename: Proposed RT Site Access Junction 310718 updated sensi.j9
Path: C:\Users\Owner\Desktop\Projects\Bleaddon\Calcs\July 18 Review Post LHA Comments
Report generation date: 01/08/2018 15:02:17

- »2018 + Dev, AM
- »2018 + Dev, PM
- »2023 + Dev, AM
- »2023 + Dev, PM
- »2023 + Dev + Sensitivity, AM
- »2023 + Dev + Sensitivity, PM

Summary of junction performance

	AM				PM			
	Queue (Veh)	Delay (s)	RFC	LOS	Queue (Veh)	Delay (s)	RFC	LOS
2018 + Dev								
Stream B-C	0.0	5.81	0.01	A	0.0	6.40	0.01	A
Stream B-A	0.2	12.61	0.19	B	0.1	13.59	0.11	B
Stream C-AB	0.0	5.85	0.01	A	0.0	6.82	0.01	A
2023 + Dev								
Stream B-C	0.0	5.92	0.01	A	0.0	6.58	0.01	A
Stream B-A	0.2	13.35	0.20	B	0.1	14.72	0.12	B
Stream C-AB	0.0	5.94	0.01	A	0.0	7.01	0.02	A
2023 + Dev + Sensitivity								
Stream B-C	0.0	7.28	0.05	A	0.0	7.35	0.03	A
Stream B-A	0.8	19.98	0.46	C	0.4	19.03	0.28	C
Stream C-AB	0.0	6.13	0.03	A	0.0	7.60	0.04	A

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	(untitled)
Location	
Site number	
Date	16/08/2017
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	
Enumerator	LAPTOP-7DHGMOJIOwner
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	Veh	Veh	perTimeSegment	s	-Min	perMin

Analysis Options

Vehicle length (m)	Calculate Queue Percentiles	Calculate detailed queueing delay	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
5.75				0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Description	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)	Run automatically
D1	2018 + Dev	AM		DIRECT	08:00	09:00	60	15	✓
D2	2018 + Dev	PM		DIRECT	16:45	17:45	60	15	✓
D3	2023 + Dev	AM		DIRECT	08:00	09:00	60	15	✓
D4	2023 + Dev	PM		DIRECT	16:45	17:45	60	15	✓
D5	2023 + Dev + Sensitivity	AM	Sensitivity test putting village traffic and 50% healthcare traffic through site access.	DIRECT	08:00	09:00	60	15	✓
D6	2023 + Dev + Sensitivity	PM	Sensitivity test putting village traffic and 50% healthcare traffic through site access.	DIRECT	16:45	17:45	60	15	✓

Analysis Set Details

ID	Include in report	Network flow scaling factor (%)	Network capacity scaling factor (%)
A1	✓	100.000	100.000

2018 + Dev, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction Type	Major road direction	Junction Delay (s)	Junction LOS
1	Site Access / Bridgwater Rd	T-Junction	Two-way	0.67	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Arms

Arms

Arm	Name	Description	Arm type
A	Bridgwater Road North		Major
B	Site Access		Minor
C	Bridgwater Road South		Major

Major Arm Geometry

Arm	Width of carriageway (m)	Has kerbed central reserve	Has right turn bay	Width for right turn (m)	Visibility for right turn (m)	Blocks?	Blocking queue (PCU)
C	6.10		✓	3.50	250.0	✓	15.00

Geometries for Arm C are measured opposite Arm B. Geometries for Arm A (if relevant) are measured opposite Arm D.

Minor Arm Geometry

Arm	Minor arm type	Width at give-way (m)	Width at 5m (m)	Width at 10m (m)	Width at 15m (m)	Width at 20m (m)	Estimate flare length	Flare length (PCU)	Visibility to left (m)	Visibility to right (m)
B	One lane plus flare	10.00	4.00	2.75	2.75	2.75		1.00	250	165

Slope / Intercept / Capacity

Priority Intersection Slopes and Intercepts

Junction	Stream	Intercept (Veh/TS)	Slope for A-B	Slope for A-C	Slope for C-A	Slope for C-B
1	B-A	169.634	0.123	0.311	0.196	0.444
1	B-C	218.385	0.133	0.337	-	-
1	C-B	205.108	0.317	0.317	-	-

The slopes and intercepts shown above do NOT include any corrections or adjustments.

Streams may be combined, in which case capacity will be adjusted.

Values are shown for the first time segment only; they may differ for subsequent time segments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)	Run automatically
D1	2018 + Dev	AM	DIRECT	08:00	09:00	60	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)	O-D data varies over time
✓	✓	HV Percentages	2.00	✓

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Scaling Factor (%)
A		DIRECT	✓	100.000
B		DIRECT	✓	100.000
C		DIRECT	✓	100.000

Origin-Destination Data

Demand (Veh/TS)

08:00 - 08:15

		To			
		A	B	C	
From	A	0.00	6.00	124.00	
	B	16.00	0.00	2.00	
	C	149.00	1.00	0.00	

Demand (Veh/TS)

08:15 - 08:30

		To			
		A	B	C	
From	A	0.00	7.00	144.00	
	B	17.00	0.00	2.00	
	C	159.00	1.00	0.00	

Demand (Veh/TS)

08:30 - 08:45

		To			
		A	B	C	
From	A	0.00	7.00	141.00	
	B	14.00	0.00	2.00	
	C	135.00	1.00	0.00	

Demand (Veh/TS)

08:45 - 09:00

		To			
		A	B	C	
From	A	0.00	6.00	120.00	
	B	15.00	0.00	2.00	
	C	143.00	1.00	0.00	

Vehicle Mix

Heavy Vehicle Percentages

		To			
		A	B	C	
From	A	0	0	6	
	B	0	0	0	
	C	5	0	0	

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/TS)	Total Junction Arrivals (Veh)
B-C	0.01	5.81	0.0	A	2.00	8.00
B-A	0.19	12.61	0.2	B	15.50	62.00
C-AB	0.01	5.85	0.0	A	1.00	4.00
C-A					146.50	586.00
A-B					6.50	26.00
A-C					132.25	529.00

Main Results for each time segment

08:00 - 08:15

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	2.00	2.00	165.57	0.012	1.99	0.0	0.0	5.501	A
B-A	16.00	16.00	97.01	0.165	15.81	0.0	0.2	11.056	B
C-AB	1.00	1.00	161.73	0.006	0.99	0.0	0.0	5.598	A
C-A	149.00	149.00			149.00				
A-B	6.00	6.00			6.00				
A-C	124.00	124.00			124.00				

08:15 - 08:30

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	2.00	2.00	156.96	0.013	2.00	0.0	0.0	5.807	A
B-A	17.00	17.00	88.25	0.193	16.96	0.2	0.2	12.615	B
C-AB	1.00	1.00	154.72	0.006	1.00	0.0	0.0	5.854	A
C-A	159.00	159.00			159.00				
A-B	7.00	7.00			7.00				
A-C	144.00	144.00			144.00				

08:30 - 08:45

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	2.00	2.00	160.39	0.012	2.00	0.0	0.0	5.681	A
B-A	14.00	14.00	94.18	0.149	14.06	0.2	0.2	11.242	B
C-AB	1.00	1.00	155.72	0.006	1.00	0.0	0.0	5.816	A
C-A	135.00	135.00			135.00				
A-B	7.00	7.00			7.00				
A-C	141.00	141.00			141.00				

08:45 - 09:00

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	2.00	2.00	167.62	0.012	2.00	0.0	0.0	5.433	A
B-A	15.00	15.00	99.56	0.151	15.00	0.2	0.2	10.642	B
C-AB	1.00	1.00	163.06	0.006	1.00	0.0	0.0	5.552	A
C-A	143.00	143.00			143.00				
A-B	6.00	6.00			6.00				
A-C	120.00	120.00			120.00				

2018 + Dev, PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction Type	Major road direction	Junction Delay (s)	Junction LOS
1	Site Access / Bridgwater Rd	T-Junction	Two-way	0.35	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)	Run automatically
D2	2018 + Dev	PM	DIRECT	16:45	17:45	60	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)	O-D data varies over time
✓	✓	HV Percentages	2.00	✓

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Scaling Factor (%)
A		DIRECT	✓	100.000
B		DIRECT	✓	100.000
C		DIRECT	✓	100.000

Origin-Destination Data

Demand (Veh/TS)

16:45 - 17:00

		To		
		A	B	C
From	A	0.00	15.00	188.00
	B	8.00	0.00	1.00
	C	133.00	2.00	0.00

Demand (Veh/TS)

17:00 - 17:15

		To		
		A	B	C
From	A	0.00	15.00	193.00
	B	8.00	0.00	1.00
	C	142.00	2.00	0.00

Demand (Veh/TS)

17:15 - 17:30

		To		
		A	B	C
From	A	0.00	16.00	204.00
	B	8.00	0.00	1.00
	C	136.00	2.00	0.00

Demand (Veh/TS)

17:30 - 17:45

		To		
		A	B	C
From	A	0.00	14.00	181.00
	B	7.00	0.00	1.00
	C	123.00	2.00	0.00

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	2
	B	0	0	0
	C	4	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/TS)	Total Junction Arrivals (Veh)
B-C	0.01	6.40	0.0	A	1.00	4.00
B-A	0.11	13.59	0.1	B	7.75	31.00
C-AB	0.01	6.82	0.0	A	2.00	8.00
C-A					133.50	534.00
A-B					15.00	60.00
A-C					191.50	766.00

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	147.59	0.007	0.99	0.0	0.0	6.138	A
B-A	8.00	8.00	80.06	0.100	7.89	0.0	0.1	12.451	B
C-AB	2.00	2.00	139.43	0.014	1.99	0.0	0.0	6.547	A
C-A	133.00	133.00			133.00				
A-B	15.00	15.00			15.00				
A-C	188.00	188.00			188.00				

17:00 - 17:15

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	145.66	0.007	1.00	0.0	0.0	6.220	A
B-A	8.00	8.00	76.64	0.104	7.99	0.1	0.1	13.108	B
C-AB	2.00	2.00	137.81	0.015	2.00	0.0	0.0	6.626	A
C-A	142.00	142.00			142.00				
A-B	15.00	15.00			15.00				
A-C	193.00	193.00			193.00				

17:15 - 17:30

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	141.70	0.007	1.00	0.0	0.0	6.396	A
B-A	8.00	8.00	74.23	0.108	8.00	0.1	0.1	13.588	B
C-AB	2.00	2.00	133.93	0.015	2.00	0.0	0.0	6.821	A
C-A	136.00	136.00			136.00				
A-B	16.00	16.00			16.00				
A-C	204.00	204.00			204.00				

17:30 - 17:45

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	150.73	0.007	1.00	0.0	0.0	6.012	A
B-A	7.00	7.00	84.44	0.083	7.03	0.1	0.1	11.630	B
C-AB	2.00	2.00	142.02	0.014	2.00	0.0	0.0	6.429	A
C-A	123.00	123.00			123.00				
A-B	14.00	14.00			14.00				
A-C	181.00	181.00			181.00				

2023 + Dev, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction Type	Major road direction	Junction Delay (s)	Junction LOS
1	Site Access / Bridgwater Rd	T-Junction	Two-way	0.67	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)	Run automatically
D3	2023 + Dev	AM	DIRECT	08:00	09:00	60	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)	O-D data varies over time
✓	✓	HV Percentages	2.00	✓

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Scaling Factor (%)
A		DIRECT	✓	100.000
B		DIRECT	✓	100.000
C		DIRECT	✓	100.000

Origin-Destination Data

Demand (Veh/TS)

		To			
		A	B	C	
08:00 - 08:15	From	A	0.00	6.00	131.00
		B	16.00	0.00	2.00
		C	156.00	1.00	0.00

Demand (Veh/TS)

		To			
		A	B	C	
08:15 - 08:30	From	A	0.00	7.00	151.00
		B	17.00	0.00	2.00
		C	167.00	1.00	0.00

Demand (Veh/TS)

		To			
		A	B	C	
08:30 - 08:45	From	A	0.00	7.00	148.00
		B	14.00	0.00	2.00
		C	142.00	1.00	0.00

Demand (Veh/TS)

08:45 - 09:00

		To		
		A	B	C
From	A	0.00	6.00	127.00
	B	15.00	0.00	2.00
	C	150.00	1.00	0.00

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	6
	B	0	0	0
	C	5	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/TS)	Total Junction Arrivals (Veh)
B-C	0.01	5.92	0.0	A	2.00	8.00
B-A	0.20	13.35	0.2	B	15.50	62.00
C-AB	0.01	5.94	0.0	A	1.00	4.00
C-A					153.75	615.00
A-B					6.50	26.00
A-C					139.25	557.00

Main Results for each time segment

08:00 - 08:15

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	2.00	2.00	162.82	0.012	1.99	0.0	0.0	5.595	A
B-A	16.00	16.00	93.27	0.172	15.80	0.0	0.2	11.587	B
C-AB	1.00	1.00	159.38	0.006	0.99	0.0	0.0	5.681	A
C-A	156.00	156.00			156.00				
A-B	6.00	6.00			6.00				
A-C	131.00	131.00			131.00				

08:15 - 08:30

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	2.00	2.00	154.07	0.013	2.00	0.0	0.0	5.917	A
B-A	17.00	17.00	84.31	0.202	16.96	0.2	0.2	13.352	B
C-AB	1.00	1.00	152.38	0.007	1.00	0.0	0.0	5.944	A
C-A	167.00	167.00			167.00				
A-B	7.00	7.00			7.00				
A-C	151.00	151.00			151.00				

08:30 - 08:45

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	2.00	2.00	157.67	0.013	2.00	0.0	0.0	5.780	A
B-A	14.00	14.00	90.44	0.155	14.06	0.2	0.2	11.795	B
C-AB	1.00	1.00	153.38	0.007	1.00	0.0	0.0	5.905	A
C-A	142.00	142.00			142.00				
A-B	7.00	7.00			7.00				
A-C	148.00	148.00			148.00				

08:45 - 09:00

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	2.00	2.00	164.90	0.012	2.00	0.0	0.0	5.524	A
B-A	15.00	15.00	95.82	0.157	15.00	0.2	0.2	11.137	B
C-AB	1.00	1.00	160.72	0.006	1.00	0.0	0.0	5.634	A
C-A	150.00	150.00			150.00				
A-B	6.00	6.00			6.00				
A-C	127.00	127.00			127.00				

2023 + Dev, PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction Type	Major road direction	Junction Delay (s)	Junction LOS
1	Site Access / Bridgwater Rd	T-Junction	Two-way	0.36	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)	Run automatically
D4	2023 + Dev	PM	DIRECT	16:45	17:45	60	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)	O-D data varies over time
✓	✓	HV Percentages	2.00	✓

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Scaling Factor (%)
A		DIRECT	✓	100.000
B		DIRECT	✓	100.000
C		DIRECT	✓	100.000

Origin-Destination Data

Demand (Veh/TS)

16:45 - 17:00

		To		
		A	B	C
From	A	0.00	15.00	198.00
	B	8.00	0.00	1.00
	C	140.00	2.00	0.00

Demand (Veh/TS)

17:00 - 17:15

		To		
		A	B	C
From	A	0.00	15.00	203.00
	B	8.00	0.00	1.00
	C	149.00	2.00	0.00

Demand (Veh/TS)

17:15 - 17:30

		To		
		A	B	C
From	A	0.00	16.00	215.00
	B	8.00	0.00	1.00
	C	144.00	2.00	0.00

Demand (Veh/TS)

17:30 - 17:45

		To		
		A	B	C
From	A	0.00	14.00	190.00
	B	7.00	0.00	1.00
	C	130.00	2.00	0.00

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	2
	B	0	0	0
	C	4	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/TS)	Total Junction Arrivals (Veh)
B-C	0.01	6.58	0.0	A	1.00	4.00
B-A	0.12	14.72	0.1	B	7.75	31.00
C-AB	0.02	7.01	0.0	A	2.00	8.00
C-A					140.75	563.00
A-B					15.00	60.00
A-C					201.50	806.00

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	143.98	0.007	0.99	0.0	0.0	6.294	A
B-A	8.00	8.00	75.46	0.106	7.88	0.0	0.1	13.296	B
C-AB	2.00	2.00	136.19	0.015	1.99	0.0	0.0	6.706	A
C-A	140.00	140.00			140.00				
A-B	15.00	15.00			15.00				
A-C	198.00	198.00			198.00				

17:00 - 17:15

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	142.02	0.007	1.00	0.0	0.0	6.381	A
B-A	8.00	8.00	72.04	0.111	7.99	0.1	0.1	14.050	B
C-AB	2.00	2.00	134.57	0.015	2.00	0.0	0.0	6.788	A
C-A	149.00	149.00			149.00				
A-B	15.00	15.00			15.00				
A-C	203.00	203.00			203.00				

17:15 - 17:30

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	137.68	0.007	1.00	0.0	0.0	6.584	A
B-A	8.00	8.00	69.11	0.116	7.99	0.1	0.1	14.724	B
C-AB	2.00	2.00	130.36	0.015	2.00	0.0	0.0	7.010	A
C-A	144.00	144.00			144.00				
A-B	16.00	16.00			16.00				
A-C	215.00	215.00			215.00				

17:30 - 17:45

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	147.50	0.007	1.00	0.0	0.0	6.145	A
B-A	7.00	7.00	80.15	0.087	7.03	0.1	0.1	12.315	B
C-AB	2.00	2.00	139.10	0.014	2.00	0.0	0.0	6.563	A
C-A	130.00	130.00			130.00				
A-B	14.00	14.00			14.00				
A-C	190.00	190.00			190.00				

2023 + Dev + Sensitivity, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction Type	Major road direction	Junction Delay (s)	Junction LOS
1	Site Access / Bridgwater Rd	T-Junction	Two-way	2.04	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Description	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)	Run automatically
D5	2023 + Dev + Sensitivity	AM	Sensitivity test putting village traffic and 50% healthcare traffic through site access.	DIRECT	08:00	09:00	60	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)	O-D data varies over time
✓	✓	HV Percentages	2.00	✓

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Scaling Factor (%)
A		DIRECT	✓	100.000
B		DIRECT	✓	100.000
C		DIRECT	✓	100.000

Origin-Destination Data

Demand (Veh/TS)

08:00 - 08:15

		To		
		A	B	C
From	A	0.00	14.00	131.00
	B	32.00	0.00	5.00
	C	156.00	4.00	0.00

Demand (Veh/TS)

08:15 - 08:30

		To		
		A	B	C
From	A	0.00	18.00	151.00
	B	38.00	0.00	6.00
	C	167.00	2.00	0.00

Demand (Veh/TS)

08:30 - 08:45

		To		
		A	B	C
From	A	0.00	17.00	148.00
	B	33.00	0.00	4.00
	C	142.00	3.00	0.00

Demand (Veh/TS)

08:45 - 09:00

		To		
		A	B	C
From	A	0.00	15.00	127.00
	B	36.00	0.00	6.00
	C	150.00	3.00	0.00

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	6
	B	0	0	0
	C	5	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/TS)	Total Junction Arrivals (Veh)
B-C	0.05	7.28	0.0	A	5.25	21.00
B-A	0.46	19.98	0.8	C	34.75	139.00
C-AB	0.03	6.13	0.0	A	3.00	12.00
C-A					153.75	615.00
A-B					16.00	64.00
A-C					139.25	557.00

Main Results for each time segment

08:00 - 08:15

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	5.00	5.00	148.64	0.034	4.97	0.0	0.0	6.262	A
B-A	32.00	32.00	90.93	0.352	31.47	0.0	0.5	15.009	C
C-AB	4.00	4.00	156.85	0.026	3.97	0.0	0.0	5.887	A
C-A	156.00	156.00			156.00				
A-B	14.00	14.00			14.00				
A-C	131.00	131.00			131.00				

08:15 - 08:30

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	6.00	6.00	129.68	0.046	5.99	0.0	0.0	7.276	A
B-A	38.00	38.00	82.44	0.461	37.71	0.5	0.8	19.983	C
C-AB	2.00	2.00	148.90	0.013	2.01	0.0	0.0	6.129	A
C-A	167.00	167.00			167.00				
A-B	18.00	18.00			18.00				
A-C	151.00	151.00			151.00				

08:30 - 08:45

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	4.00	4.00	139.94	0.029	4.02	0.0	0.0	6.621	A
B-A	33.00	33.00	88.30	0.374	33.21	0.8	0.6	16.402	C
C-AB	3.00	3.00	150.22	0.020	2.99	0.0	0.0	6.112	A
C-A	142.00	142.00			142.00				
A-B	17.00	17.00			17.00				
A-C	148.00	148.00			148.00				

08:45 - 09:00

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	6.00	6.00	145.95	0.041	5.99	0.0	0.0	6.429	A
B-A	36.00	36.00	93.77	0.384	36.00	0.6	0.6	15.574	C
C-AB	3.00	3.00	157.87	0.019	3.00	0.0	0.0	5.812	A
C-A	150.00	150.00			150.00				
A-B	15.00	15.00			15.00				
A-C	127.00	127.00			127.00				

2023 + Dev + Sensitivity, PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction Type	Major road direction	Junction Delay (s)	Junction LOS
1	Site Access / Bridgwater Rd	T-Junction	Two-way	0.94	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Description	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)	Run automatically
D6	2023 + Dev + Sensitivity	PM	Sensitivity test putting village traffic and 50% healthcare traffic through site access.	DIRECT	16:45	17:45	60	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)	O-D data varies over time
✓	✓	HV Percentages	2.00	✓

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Scaling Factor (%)
A		DIRECT	✓	100.000
B		DIRECT	✓	100.000
C		DIRECT	✓	100.000

Origin-Destination Data

Demand (Veh/TS)

16:45 - 17:00

		To		
		A	B	C
From	A	0.00	32.00	198.00
	B	20.00	0.00	3.00
	C	140.00	3.00	0.00

Demand (Veh/TS)

17:00 - 17:15

		To		
		A	B	C
From	A	0.00	36.00	203.00
	B	15.00	0.00	3.00
	C	149.00	5.00	0.00

Demand (Veh/TS)

17:15 - 17:30

		To		
		A	B	C
From	A	0.00	41.00	215.00
	B	18.00	0.00	4.00
	C	144.00	4.00	0.00

Demand (Veh/TS)

17:30 - 17:45

		To		
		A	B	C
From	A	0.00	34.00	190.00
	B	18.00	0.00	1.00
	C	130.00	3.00	0.00

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	2
	B	0	0	0
	C	4	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/TS)	Total Junction Arrivals (Veh)
B-C	0.03	7.35	0.0	A	2.75	11.00
B-A	0.28	19.03	0.4	C	17.75	71.00
C-AB	0.04	7.60	0.0	A	3.75	15.00
C-A					140.75	563.00
A-B					35.75	143.00
A-C					201.50	806.00

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	3.00	3.00	133.18	0.023	2.98	0.0	0.0	6.912	A
B-A	20.00	20.00	72.92	0.274	19.63	0.0	0.4	16.780	C
C-AB	3.00	3.00	130.81	0.023	2.98	0.0	0.0	7.040	A
C-A	140.00	140.00			140.00				
A-B	32.00	32.00			32.00				
A-C	198.00	198.00			198.00				

17:00 - 17:15

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	3.00	3.00	134.00	0.022	3.00	0.0	0.0	6.869	A
B-A	15.00	15.00	68.11	0.220	15.08	0.4	0.3	16.998	C
C-AB	5.00	5.00	127.92	0.039	4.98	0.0	0.0	7.320	A
C-A	149.00	149.00			149.00				
A-B	36.00	36.00			36.00				
A-C	203.00	203.00			203.00				

17:15 - 17:30

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	4.00	4.00	126.36	0.032	3.99	0.0	0.0	7.354	A
B-A	18.00	18.00	65.11	0.276	17.92	0.3	0.4	19.031	C
C-AB	4.00	4.00	122.45	0.033	4.01	0.0	0.0	7.600	A
C-A	144.00	144.00			144.00				
A-B	41.00	41.00			41.00				
A-C	215.00	215.00			215.00				

17:30 - 17:45

Stream	Total Demand (Veh/TS)	Junction Arrivals (Veh)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	1.00	1.00	137.65	0.007	1.03	0.0	0.0	6.587	A
B-A	18.00	18.00	77.24	0.233	18.06	0.4	0.3	15.228	C
C-AB	3.00	3.00	132.77	0.023	3.01	0.0	0.0	6.938	A
C-A	130.00	130.00			130.00				
A-B	34.00	34.00			34.00				
A-C	190.00	190.00			190.00				

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix XII

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix XIII



**FLOOD RISK ASSESSMENT
FOR
PROPOSED RESIDENTIAL DEVELOPMENT
LAND AT BLEADON ROAD, BLEADON, WESTON-SUPER-MARE
ON BEHALF OF
MR C SANDERS**

JULY 2018

[ISSUE 4]

Bristol Office:

160 Aztec
Aztec West
Almondsbury
Bristol
BS32 4TU

Tel. 01454 800474

Email: br@ColeEasdon.com

www.ColeEasdon.com



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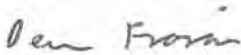
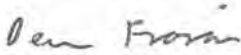
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COLE EASDON CONSULTANTS (CEC)

DOCUMENT ISSUE RECORD

Client: Mr C Sanders
Project: Proposed Development, Land at Bleadon Road, Bleadon, Western-Super-Mare
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Prepared:	N. Jackson MSc	N. Jackson MSc	N. Jackson MSc	N. Jackson MSc
Signature:				
Document Check:	S. Seed BA (Hons)	S. Seed BA (Hons)	S. Seed BA (Hons)	S. Seed BA (Hons)
Signature:				
Technical Check:	D. Frosoni CEng MICE MCIWEM	D. Frosoni CEng MICE MCIWEM	D. Frosoni CEng MICE MCIWEM	D. Frosoni CEng MICE MCIWEM
Signature:				
Authorised:	D. Frosoni CEng MICE MCIWEM	D. Frosoni CEng MICE MCIWEM	D. Frosoni CEng MICE MCIWEM	D. Frosoni CEng MICE MCIWEM
Signature:				
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3.0	FLOOD RISK ISSUES	5
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APPENDICES

Appendix 1 - CEC Figures

CEC Figure 5897/500 Figure 1	Site Location Plan
CEC Figure 5897/500 Figure 2	EA Flood Zone Map
CEC Figure 5897/500 Figure 3	EA Surface Water Flood Zone Map

Appendix 2 - Wessex Water Sewer Records & Site Investigation

Appendix 3 - Calculations

Appendix 4 - Drawings by Others

Drawing No. LMP001	Illustrative Masterplan (by Urban Design Practice)
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Appendix 5 - CEC Plans

CEC Plan 5897/501	Existing Site Layout
CEC Plan 5897/502	Proposed Site Layout

Appendix 6 - Sequential Test

1.0 INTRODUCTION

1.1 This *Flood Risk Assessment* has been prepared by Cole Easdon Consultants on behalf of Mr C Sanders in support of a planning application for a residential led development of land at Bleadon Road, Bleadon, Western-Super-Mare. Refer to CEC Figure 5897/500 Figure 1 [*Site Location Plan*] in Appendix 1.

Development Proposals

1.2 Development proposals comprise 200 residential units with some 600m² of commercial buildings with associated parking, access and landscaping.

1.3 This study is based on Drawing No. LMP001 [*Illustrative Masterplan*] prepared by Urban Design Practice. Refer to Appendix 4.

Need for Study

1.4 The purpose of this assessment is to demonstrate that the development proposal outlined above can be satisfactorily accommodated without worsening flood risk for the area and without placing the development itself at risk of flooding, as per National guidance provided within the National Planning Policy Framework document (NPPF).

1.5 Accordingly, this study has been prepared to:

- i) assess flood risk to the development from fluvial sources;
- ii) assess flood risk to the development from other potential sources, including ditches, sewers, groundwater and overland flows; and
- iii) ensure that the proposed development will fully comply with the requirements of the Environment Agency's policy on the safeguarding of floodplains.

1.6 A topographical survey has been provided to Cole Easdon Consultants and has been reviewed as part of this study.

Scope of Study

1.7 In Section 2.0, we describe the characteristics of the proposed development site and surrounding area. In Section 3.0, we assess flood risk issues and outline the proposed surface water drainage strategy. In Section 4.0, we assess the foul water disposal. Finally, conclusions are presented in Section 5.0.



1.8 The following abbreviations are used in this report:

- AOD - Above Ordnance Datum;
- BGS - British Geological Society;
- EA - Environment Agency;
- FZM - Flood Zone Map prepared by the EA;
- IDB - Internal Drainage Board
- NPPF - National Planning Policy Framework;
- SFRA - Strategic Flood Risk Assessment;
- SUDS - Sustainable Urban Drainage Systems;
- SWMP - Surface Water Management Plan; and
- WW - Wessex Water.

2.0 THE EXISTING SITE

Refer to CEC Plan 5897/501 [*Existing Site Layout*] in Appendix 5.

- 2.1 The proposed development site comprises 10.6ha area of greenfield land located to the south of Bleadon Road which forms the northern site boundary. The western boundary is formed by an agricultural field with the eastern and southern boundaries formed by Bridge Road and Bridgewater Road (A370) respectively. The site is bounded by an IDB maintained rhyne along the eastern and northern boundaries.
- 2.2 Land use within the vicinity of the site is a mix of agricultural and residential to the north of the site. A caravan park is situated to the south west of the site.
- 2.3 The topographical survey indicates the site is mostly flat. Levels vary between 6.4m AOD and 7.0m AOD across the site.

Nearby Watercourses/Drainage Features

- 2.4 The River Axe is located some 100m at its closest point to the south of the site. It flows in a westerly direction and away from the site. The topographic survey indicates the site is bounded by drainage rhyne on all boundaries. Additionally, an existing drainage rhyne is routed through the site in a north/south direction. A site visit has been undertaken in September 2017 when it was noted that the rhyne were not flowing and had some 5cm of standing water. The rhyne discharge at two points to piped culverts (1050mm and 450mm diameter) which, in turn, discharge to the River Axe to the west of the site. The boundary rhyne receive runoff from the site and surrounding highway drainage via piped outputs into the rhyne network.

Existing Drainage

- 2.5 Asset records provided by Wessex Water (WW) indicate the presence of public foul water sewers located within Bleadon Road to the north of the site and Bridge Road to the east of the site. The sewers discharge to a foul water pumping station located to the north of Bleadon Road. A foul water rising main then flows in a westerly direction away from the site. Refer to Appendix 2.
- 2.6 The site has been split into two drainage catchments, Eastern and Western. Equivalent greenfield runoff rates from the eastern catchment for the proposed development hard area (1.669ha) have been calculated to be 6.2l/s for the QBAR event, 11.7l/s for the 1 in 30



year event and 14.9l/s for the 1:100 year event. Equivalent greenfield runoff rates from the western catchment for the proposed development hard area (2.297ha) have been calculated to be 8.5l/s for the QBAR event, 16.1l/s for the 1 in 30 year event and 20.5l/s for the 1:100 year event. Refer to Appendix 3.

Existing Ground Conditions

- 2.7 Records acquired from the British Geological Society (BGS) indicate the site is situated on Mercia Mudstone Group - Mudstone and Halite-stone overlain by superficial Tidal Flat Deposits - Clay, Silt and Sand.

- 2.8 The EA's Groundwater Source Protection Zone Map shows that the site is remote from any groundwater source protection zones. The EA mapping also shows the bedrock aquifer underlying the site is classified as a Secondary 'B' Aquifer with the superficial deposits classified as a Secondary 'Undifferentiated' Aquifer.

3.0 FLOOD RISK ISSUES

Refer to CEC Plans 5897/501 [*Existing Site Layout*] and 5897/502 [*Proposed Site Layout*], both located in Appendix 5.

3.1 This section presents an assessment of flood risk to the development from:

- a) external sources; and
- b) surface water discharge from the proposed development.

3.2 Recommended flood risk mitigation measures appropriate to the level of perceived risk are included in the assessment. The mitigation measures are summarised in Table 3.1 on page 7.

Flood History

3.3 The SFRA and SWMP for North Somerset Council indicate there have been three recorded flood events in the vicinity of the site, with none recorded within the site. The origin and details of the flooding is not stated. However, the reports do highlight locations where flooding has occurred. Please refer to Appendix 2.

A) Assessment of Flood Risk to the Development Site from External Sources

Ai) Assessment of Flood Risk from Tidal and Fluvial Sources

3.4 The Flood Zone Map (FZM) for the locality as produced by the EA is shown on CEC Figure 5897/500/Figure 2 [*EA Flood Zone Map*] within Appendix 1. According to the FZM it can be seen that the site lies within Flood Zone 1 (low risk) and Flood Zone 2 (Moderate Risk). EA data has been obtained for the site. Using this data, a stage discharge curve has been produced to estimate the climate change flood level in relation to the site. For this location, a climate change increase of 85% has been considered in respect of fluvial flow. A fluvial flood level of 5.3m AOD for the 1:100 year + 85% climate change event has been calculated from the Stage discharge curve. Refer to Appendix 2. At 6.4m - 6.6mAOD, ground levels across the development site are higher than 5.3mAOD. Therefore, flood risk from fluvial sources can be considered low.

3.5 The EA's modelled data (2012) shows that for the 0.5% and 0.1% tidal events the undefended flood levels at the site are 6.3mAOD and 7.05mAOD respectively. These are present day levels (2012) and exclude climate change. Site levels vary from some 6.4m to 6.6mAOD. On this basis the site is classified as being within the 0.1% floodplain (Flood Zone

2). However, when climate change increases are applied in accordance with Central Government's published sea level rise allowances for the SouthWest between 2012 and 2115, the undefended 0.5% tidal flood level increases to 7.365mAOD, thereby placing the site wholly within Flood Zone 3. Thus, the Exception Test needs to be applied.

Exception Test

- 3.6 To pass the Exception Test, it must be shown that the proposed development will:
- i) provide wider [sustainability benefits to the community that outweigh flood risk](#), and;
 - ii) that it will be [safe for its lifetime](#), without increasing flood risk elsewhere and where possible reduce flood risk overall.
- 3.7 In relation to i), the development will offer the following wider sustainability benefits that outweigh flood risk:
- additional housing in an area of need (i.e. no land supply);
 - sustainability of the village will be aided through the inclusion of much needed facilities, such as a doctors surgery & health centre;
 - the long term sustainability of local businesses will be assisted;
 - increased affordability of the settlement for a wider range of occupiers / rebalancing the tendency towards retirement accommodation;
 - 30% affordable housing will be provided;
 - improved management of ecology and landscape;
 - improved drainage that benefits wider village through a reduction in flood risk;
 - improved highway safety that benefits the wider village;
 - improved connectivity (walking / cycling); and
 - opportunities for outside leisure (fit trail / cycling).
- 3.8 In relation to ii) this FRA provides the necessary evidence to show that the development will be safe for its lifetime without increasing flood risk elsewhere.

Fluvial Mitigation Measures

- 3.9 During a tidal climate change event, the existing flood defences on the River Axe could be overtopped or breached and the site could potentially flood to depths of 765 - 965mm. The following mitigation measures are therefore proposed:
1. No ground floor sleeping accommodation.
 2. Ground floors to be floodable. Flood resilient construction measures to be incorporated into dwellings.

3. Inclusion of a flood warning and evacuation plan.

Flood Resilient Construction Measures

- 3.10 The following flood resilient construction measures could be incorporated into the proposed dwellings:
- ground floor - solid concrete slab construction;
 - external walls - brick/block cavity construction;
 - internal walls - blockwork construction;
 - internal finishes to walls - cement/sand render with SIKA waterproof additive with finish coat of lime based plaster;
 - ground floor - tiles;
 - service entries - to be sealed at interface with external wall and floor construction with gaskets or waterproof packing with mastic pointing;
 - gas boiler - to be elevated;
 - external drainage and vent stacks - to be fitted with non-return valves where connected to public sewer; and
 - electrical wiring - lighting and power rings shall be at first floor level with concealed plastic conduit drops to ground floor outlets. Ground floor outlets to be located at high level. Meter to be elevated.

Flood Management Plan

- 3.11 North Somerset Council is designated as a Category 1 Responder under the Civil Contingencies Act 2004. As such, the Council has defined responsibilities to assess risk, and respond appropriately in case of an emergency, including a major flooding event. Co-ordination with the emergency services and the EA is imperative to ensure the safety of residents in time of flood. As water levels rise and begin to pose a risk to life and/or livelihood, it is the responsibility of the emergency services to co-ordinate the evacuation of residents. For this reason, it is imperative that full control is provided to the emergency services during a flooding situation to determine the timing and route of any evacuation. Any evacuation plan prepared for the proposed development should be approved by the Emergency Planning Department at North Somerset Council.

Aii) Assessment of Flood Risk from Existing Ditches

- 3.12 The site is bounded by drainage rhynes on all sides. Flow through the rhynes is throttled by two downstream culverts (450mm pipe and a 1050mm pipe) that convey discharge to the River Axe to the south of the site. The rhynes receive runoff from the site and the

surrounding highways. Network modelling of the rhyes has been undertaken for the 1:100 year + 40% climate change storm event to calculate the rhyne water level at the development site location. The model has considered catchment wide piped and greenfield discharge flows into the existing rhyne system. The modelled results indicate that a maximum water level of 6.214m AOD would occur within the rhyes at the site location. Ground levels across the site are higher than 6.214mAOD and so flood risk from the ditches is therefore considered low. The modelled results have been submitted to the IDB and subsequently approved in December 2018. See correspondence in Appendix 2 & calculations within Appendix 3.

Ditch Flood Risk Mitigation Measures

- 3.13 As a precautionary measure, finished floor levels of proposed dwellings should be raised some 150mm above existing ground levels.

Aiii) Assessment of Flood Risk from Existing Sewers/ Drains

- 3.14 Existing public foul water sewers are present within the surrounding highways. Refer to Appendix 2. Should flooding of the sewers occur, runoff would likely be contained within the highway corridor and, if the kerb height was exceeded, would flow into the surrounding rhyes. The SFRA for North Somerset Council indicates there have been historic flood events to the north of the site. The SFRA does not state the cause of the flooding. There are no sewers within the site boundary, therefore flood risk can be considered low.

Sewer/ Drain Flood Risk Mitigation Measures

- 3.15 As a precautionary measure, finished floor levels of proposed dwellings should be raised some 150mm above existing ground levels.

Aiv) Assessment of Flood Risk from Overland Flow (Pluvial)

- 3.16 The Surface Water Flood Zone Map for the locality as produced by the EA is shown on CEC Figure 5897/500/Figure 3 [*EA Surface Water Flood Zone Map*] within Appendix 1. According to the mapping it can be seen that the site lies within a range of risk zones ranging from low to high risk, with the majority of the site in a low risk zone, flooding to a depth of up to 300mm. High risk areas are located within the surrounding highways and rhyes. Should flooding occur within the existing site, runoff would follow the topography of the site and either infiltrate into the ground or flow overland to the boundary rhyes. It should be noted that the site currently is not drained positively.



3.17 The SFRA and SWMP for North Somerset Council indicate there have been historic flood events in the vicinity of the site. The origin and details of the flooding is not stated. However, the reports do highlight locations where flooding has occurred. Please refer to Appendix 2. The SFRA does not state that the site is located within a Critical Drainage Area (CDA). Therefore, flood risk from surface water can be considered moderate.

Overland Flow Flood Risk Mitigation Measures

3.18 The development seeks to reduce existing flood risk elsewhere through the implementation of a sustainable surface water drainage strategy. The drainage scheme detailed in this report will result in reduced post development discharge rates to the existing rhyne system that are less than the prevailing greenfield discharge rates from the undeveloped site for storms up to the 1:100 year + 40% event, thereby providing betterment.

Av) Assessment of Flood Risk from Groundwater

3.19 Due to the relative poor permeability of the underlying geology (Mudstone and Halite-stone overlain by superficial Tidal Flat Deposits - Clay, Silt and Sand), it is considered flood risk from ground water sources is low.

Groundwater Flood Risk Mitigation Measures

3.20 No mitigation required.

Avi) Assessment of Flood Risk from Reservoir

3.21 The EA Risk of Flooding from Reservoirs Map shows the site is not at risk of flooding from reservoirs. Therefore, flood risk can be considered to be very low.

Reservoir Flood Risk Mitigation Measures

3.22 No mitigation required.

Table 3.1: Assessment of Flood Risk to the Development Site Arising from External Sources

Source of Potential Flooding to the Development Site	Flood Risk	Mitigation/Comments
Fluvial	Low	<ul style="list-style-type: none"> ▪ No mitigation required
Tidal	High	<ul style="list-style-type: none"> ▪ No ground floor sleeping accommodation ▪ Ground floors to be floodable. Flood resilient construction measures to be incorporated into dwellings. ▪ Inclusion of a flood warning and evacuation plan



Source of Potential Flooding to the Development Site	Flood Risk	Mitigation/Comments
Overland Flow	Moderate	<ul style="list-style-type: none"> Positive drainage system to be implemented to manage runoff from storms up to the 1:100 yr + 40% CC event.
Public Sewer / Drains	Low	<ul style="list-style-type: none"> As a precautionary measure, finished floor levels of proposed dwellings should be raised some 150mm above existing ground levels.
Groundwater	Low	<ul style="list-style-type: none"> No mitigation required.
Ditches	Low	<ul style="list-style-type: none"> As a precautionary measure, finished floor levels of proposed dwellings should be raised some 150mm above existing ground levels.
Reservoirs	Very Low	<ul style="list-style-type: none"> No mitigation required

B) Assessment of Flood Risk Arising from Surface Water Discharge from the Proposed Development

Refer to CEC Plan 5897/502 [*Proposed Site Layout*] in Appendix 5.

3.23 In order to mitigate flood risk posed by post development runoff, adequate control measures will need to be considered within the site.

Bi) Surface Water Runoff Control

3.24 The runoff arising from the redevelopment will need to be managed in accordance with sustainable drainage principles. The site has been split into two drainage catchments. It is proposed to restrict surface water discharge from the proposed hardstanding areas of the site to equivalent greenfield rates.

Bii) Infiltration Potential

3.25 An intrusive site investigation has not been undertaken, however based on the underlying impermeable geology it is considered that infiltration is not a feasible method for the disposal of surface water from the site. Therefore, an attenuation-based strategy is proposed.

Biii) Proposed Discharge Rate

3.26 Equivalent greenfield runoff rates from the proposed hard areas have been calculated for each catchment. Please see calculated greenfield runoff rates in paragraph 2.6 and Table 3.2 below.

- 3.27 Surface water discharge will be restricted to QBAR for all events up to and including the 1:100 year + 40% climate change event. Therefore, post development runoff will be restricted to maximums of 8.5 l/s (western catchment) and 6.2 l/s (eastern catchment).
- 3.28 All attenuation facilities will be designed to accommodate and dispose of runoff from storms up to the 1:100 year + 40% climate change event, without flooding.

Bv) Proposed Surface Water Drainage

- 3.29 Surface water runoff generated from the impermeable areas within the development will be discharged the northern IDB ditch via two drainage rhynes within the site (enlargement of an existing rhyne and creation of a new rhyne). Land raising will be required across the site (up to 700mm) in order to facilitate a gravity connection to the proposed rhynes. The two storage rhynes will be bunded at each end to prevent inflow of water from the boundary rhynes. Flow controls and one way valves will be fitted within the northern bunds to limit discharge to the northern (IDB maintained) rhyne and to prevent inflow into the attenuation rhynes from the IDB maintained rhyne under surcharged conditions. The bunds will be designed so that they can be easily maintained and so that they do not encroach upon or reduce existing rhyne capacities.
- 3.30 A 6m easement will be implemented as measured from top of bank of the proposed rhynes and the existing western boundary, to proposed development. A 9m easement will be implemented for existing rhynes that bound the northern, southern and eastern site extents.

Calculations

- 3.31 The site has been split into two drainage catchments. The drainage has been modelled with a surcharged level of 6.214m AOD. This level has been agreed with the IDB in December 2017. Refer to correspondence in Appendix 2. The modelled hard area is based upon a hard area takeoff from the proposed masterplan layout.

Eastern Catchment

- 3.32 Calculations indicate that sufficient storage can be provided on site to attenuate surface water from the proposed eastern development site for all events up to and including the 1:100 year + 40% Climate Change event under surcharged conditions. Some 3,992m³ of storage can be provided within a rhyne of 1.1m depth, 18.4m width (top of bank), 224m long and with 1:2 side slopes restricting surface water to 6.2 l/s. Refer to Appendix 3.

Western Catchment

- 3.33 Calculations indicate that sufficient storage can be provided on site to attenuate surface water from the proposed eastern development site for all events up to and including the 1:100 year + 40% Climate Change event under surcharged conditions. Some 5,153m³ of storage can be provided within a rhyne of 1.1m depth, 23.4m width (top of bank), 221m long and with 1:2 side slopes restricting surface water to 8.5 l/s. Refer to Appendix 3.

Table 3.2: Summary of Existing & Proposed Surface Water Discharge Rates

Hard area (ha)		Discharge Point	Calculation Method	Discharge Rate (l/s)				Maximum Attenuation Volume (m ³) provided
				1:2 yr	1:30 yr	1:100 yr	1:100 yr+40%	
Existing Greenfield (East)	1.669	To existing rhyes	ICP SUDS	6.2	11.7	14.9	-	-
Proposed (East)	1.669	To proposed rhyes	Micro-Drainage	6.2	6.2	6.2	6.2	3992
Existing Greenfield (West)	2.297	To existing rhyes	ICP SUDS	8.5	16.1	20.5	-	-
Proposed (West)	2.297	To proposed rhyes	Micro-Drainage	8.5	8.5	8.5	8.5	5154

Design Exceedance

- 3.34 Should the onsite drainage system fail under extreme rainfall events or blockage, flooding may occur within the site. Any resultant floodwater will be routed along proposed highway corridors either towards the open space easement areas adjacent to the proposed and existing drainage rhyes.

Water Quality, Amenity & Habitat Benefits

- 3.35 The proposed drainage rhyes will act like linear attenuation basins. Above ground attenuation storage features are recognised in the SUDS Manual C753 as having water quality benefits. However, oil interceptor will also be included for highway and carparking area runoff to provide a second treatment stage to runoff potentially contaminated with oils and hydrocarbons.
- 3.36 The proposed rhyes will also provide amenity and habitat benefits. The rhyes will be grassed/ vegetated with appropriate species so to encourage wildlife to populate the rhyes and provide amenity and visual benefits to the community. The rhyes will be fenced to prevent access for safety reasons with a gated access to allow for maintenance and mowing of the rhyes.

Adoption & Maintenance

- 3.37 The proposed rhyme storage facilities will be maintained by a private management company. A suggested Maintenance Schedule is outlined in Table 3.3 below.

Attenuation Basins/Rhynes

- 3.38 It is anticipated that the attenuation rhynes will be dry except during rainfall events, and will be grassed, and used as part of the landscaping and amenity area on site when dry. It is not anticipated that the attenuation basins will require a rigorous maintenance regime as long as silt is removed from the basins on a regular basis. Notwithstanding this, a suitable maintenance regime for the attenuation basin would be as follows:
1. Monthly - removal of litter, mowing grass & check outlet for blockages.
 2. Annually - sediment removal and tidy dead plant growth.
 3. As required - repair inlets and outlets and reinstate design levels.

Pipework and Catchpits

- 3.39 It is not envisaged that silt build up within the pipework systems will require a rigorous maintenance regime so long as silt is removed from upstream catch pits on a regular basis. Notwithstanding this, a suitable maintenance regime for the systems will comprise of routine inspection (every six months) and silt removal (as necessary).

Flow Controls

- 3.40 Flow controls should be inspected regularly for blockages and silt/ debris removed as necessary.



Table 3.3: Suggested Maintenance Regime for Elements of the Drainage Infrastructure

Drainage Element	Maintenance Requirement	Frequency
Catchpits	Inspect and remove silt	To be inspected every 6 months and silt removed as necessary
Inspection chambers & HydroBrake flow control	Inspect and remove silt/ debris	To be inspected every 6 months and silt/ debris removed as necessary. Flow control to be checked for blockages.
Attenuation Rhynes	<ul style="list-style-type: none"> ▪ Removal of litter ▪ Mow grass ▪ Check outlet for blockages 	Monthly
	<ul style="list-style-type: none"> ▪ Removal of accumulated sediment ▪ Tidy dead plant growth 	Annually
	<ul style="list-style-type: none"> ▪ Repair inlets and outlets ▪ Reinstate design levels 	As required

Note: In addition to the above maintenance requirements, it is recommended that all drainage elements are inspected:

- Following the first storm event
- Monthly for the first 3 months following commissioning

4.0 FOUL WATER DRAINAGE

- 4.1 Asset records provided by Wessex Water (WW) indicate the presence of public foul water sewers located within Bleadon Road to the north of the site and Bridge Road to the east of the site. The sewers discharge to a foul water pumping station located to the north of Bleadon Road. A foul water rising main then flows in a westerly direction away from the site. Refer to Appendix 2.
- 4.2 Due to the site levels being relatively flat, a pumped solution will be required. Foul water will be pumped to the existing foul water manhole 7946 located to the north of the site within Bleadon Road. A 15m easement will be required from the pumping station to all habitable dwellings. The pumping station would be constructed to adoptable standards.
- 4.3 Two additional pumping stations may be required within the development site if Wessex Water will not adopt foul sewers crossing beneath the proposed drainage rhynes.
- 4.4 A pre-development enquiry has been submitted to Wessex Water and a response is awaited.

5.0 DISCUSSION AND CONCLUSIONS

Assessment of Flood Risk from External Sources

- 5.1 Flood risk to the proposed development from various sources, sewers, groundwater, drains, ditches and overland flow has been considered in this study. Flood risk from all sources (aside from tidal and surface water sources) is considered to be low. Surface water flood risk is considered moderate.
- 5.2 During a tidal climate change event, the existing flood defences on the River Axe could be overtopped or breached and the site could potentially flood to depths of 765 - 965mm. The following mitigation measures are therefore proposed:
1. No ground floor sleeping accommodation.
 2. Ground floors to be floodable. Flood resilient construction measures to be incorporated into dwellings.
 3. Inclusion of a flood warning and evacuation plan.
- 5.3 The development seeks to reduce existing flood risk elsewhere (including surface water flood risk) through the implementation of a sustainable surface water drainage strategy. The drainage scheme detailed in this report will result in reduced post development discharge rates to the existing rhine system that are less than the prevailing greenfield discharge rates from the undeveloped site for storms up to the 1:100 year + 40% event, thereby providing betterment.
- 5.4 As a precautionary measure, finished floor levels of the proposed dwellings will be situated some 150mm above existing levels.
- 5.5 With regard to the Exception Test, this report demonstrates that the proposed development will:
- i) provide wider [sustainability benefits to the community that outweigh flood risk](#), and;
 - ii) that it will be [safe for its lifetime](#), without increasing flood risk elsewhere and where possible reduce flood risk overall.

Assessment of Flood Risk Arising from Surface Water Discharge from the Proposed Development

- 5.6 The development site is located on greenfield land. The proposed development will introduce impermeable surfaces in the form of access roads and roof areas. Surface water

runoff from the development site will be managed on site for storms up to the 1:100 year + 40% climate change event, without flooding.

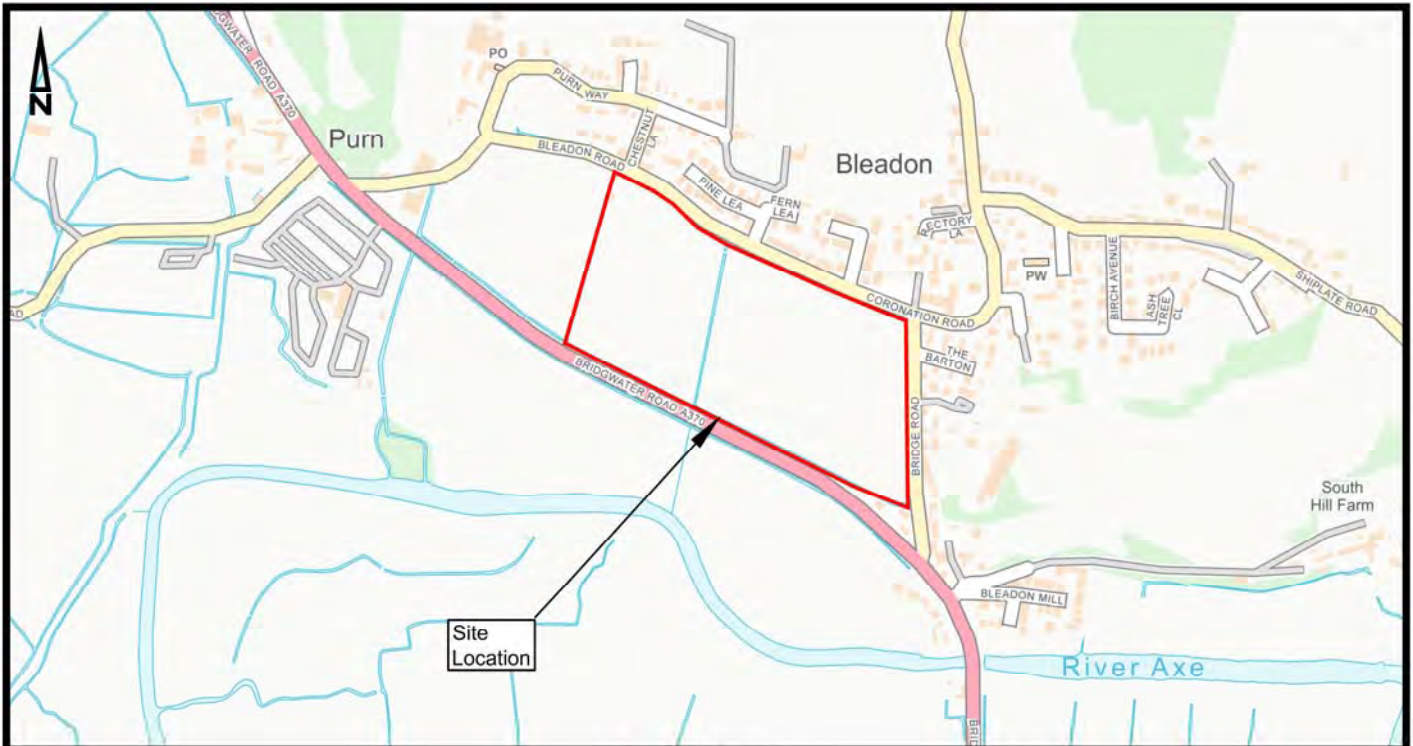
- 5.7 Post development runoff will be discharged via the use of attenuation SuDS. This will comprise upsizing an existing rhyne and the creation of a new rhyne to provide storage for the site, discharging to the existing IDB maintained rhyne to the north of the site.
- 5.8 Surface water discharge will be restricted to QBAR for all events up to and including the 1:100 year + 40% climate change event. As such, post development runoff will be restricted to maximums of 8.5 l/s (western catchment) and 6.2 l/s (eastern catchment).
- 5.9 Should the onsite drainage system fail under extreme rainfall events or blockage, flooding may occur within the site. Any resultant floodwater will be routed along proposed highway corridors either towards the open space easement areas adjacent to the proposed and existing drainage rhyne.
- 5.10 The proposed drainage rhyne will act like linear attenuation basins. Above ground attenuation storage features are recognised in the SUDS Manual C753 as having water quality benefits. However, oil interceptor will also be included for highway and carparking area runoff to provide a second treatment stage to runoff potentially contaminated with oils and hydrocarbons.
- 5.11 The proposed rhyne will also provide amenity and habitat benefits. The rhyne will be grassed/ vegetated with appropriate species so to encourage wildlife to populate the rhyne and provide amenity and visual benefits to the community. The rhyne will be fenced to prevent access for safety reasons with a gated access to allow for maintenance and mowing of the rhyne.
- 5.12 The proposed SUDs features and flow controls will be maintained by a private management company.
- 5.13 Foul water will be discharged to the public foul water network via manhole 7946 located to the north of the site. A foul water pumping station will be required on the site.
- 5.14 This study has been undertaken in accordance with the principles set out in NPPF. We can conclude that providing the development adheres to the details advised in paragraphs 5.1



to 5.13 above, the said development proposals can be accommodated without increasing flood risk within the locality in accordance with objectives set by Central Government and the EA.

Cole Easdon Consultants Limited
July 2018

Appendix 1



Scale 1:10,000



Scale 1:250,000

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COLE EASDON
CONSULTANTS

160 AZTEC
AZTEC WEST
ALMONDSBURY
BRISTOL
BS32 4TU
Tel : 01454 800474
Fax : 01454 629738

Web Site www.ColeEasdon.com
E-mail br@ColeEasdon.com

Job Title:
Proposed Development
Land at Bleadon Road
Bleadon
Weston-Super-Mare

Drawing Title:
Site Location Plan

Client:
Mr C Sanders

Drawn By
NJ

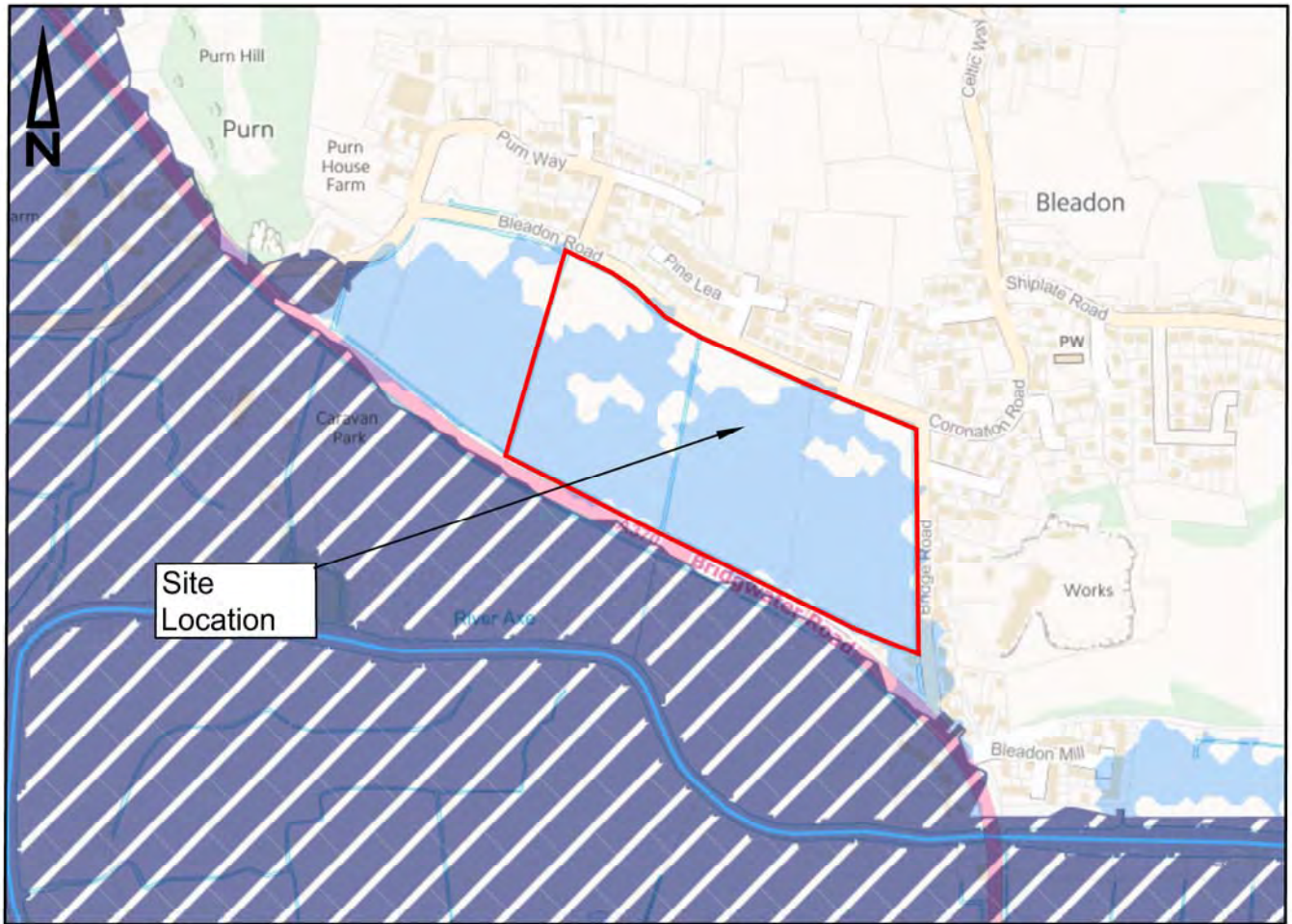
Checked By
DF

Date Drawn
February 2018

Drawing No.
5897/500 Figure 1

Scale
As shown (A4)

Revision



Flood Zone 1
- Low Risk



Flood Zone 2
- Medium Risk



Flood Zone 3
- High Risk



Main Rivers

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COLE EASDON
CONSULTANTS

160 AZTEC
AZTEC WEST
ALMONDSBURY
BRISTOL
BS32 4TU
Tel : 01454 800474
Fax : 01454 629738

Web Site www.ColeEasdon.com
E-mail br@ColeEasdon.com

Job Title:
Proposed Development
Land at Bleadon Road
Bleadon
Weston-Super-Mare

Drawing Title:
EA Flood Zone Map

Client:
Mr C Sanders

Drawn By
NJ

Checked By
DF

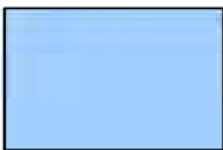
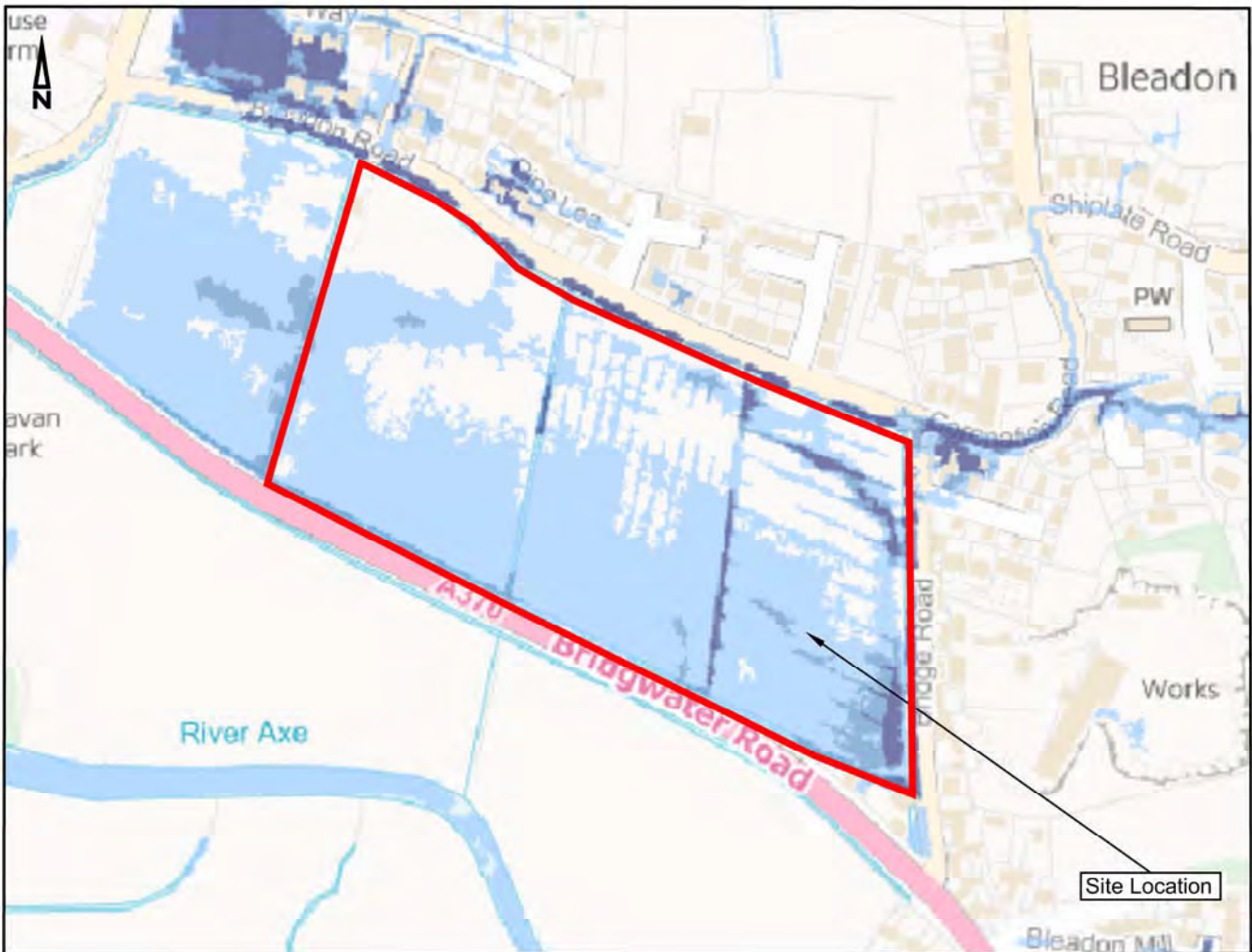
Date Drawn
February 2018

Drawing No.
5897/500 Figure 2

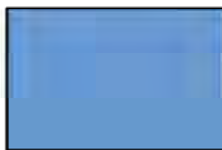
Scale
1:8,000 @ A4

Revision

DRAWING STATUS	
FOR COMMENT	
FOR PLANNING	<input checked="" type="checkbox"/>
FOR TENDER	
FOR APPROVAL	
FOR CONSTRUCTION	
AS BUILT	



Surface Water Flooding - Low Risk



Surface Water Flooding - Medium Risk



Surface Water Flooding - High Risk

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COLE EASDON CONSULTANTS

160 AZTEC
AZTEC WEST
ALMONDSBURY
BRISTOL
BS32 4TU

Tel : 01454 800474
Fax : 01454 629738

Web Site www.ColeEasdon.com
E-mail br@ColeEasdon.com

Job Title:

Proposed Development
Land at Bleadon Road
Bleadon
Western-Super-Mare

Drawing Title:

EA Surface Water Flood Zone Map

Client:

Mr C Sanders

Drawn By

NJ

Checked By

DF

Date Drawn

February 2018

Drawing No.

5897/500 Figure 3

Drawing Status:

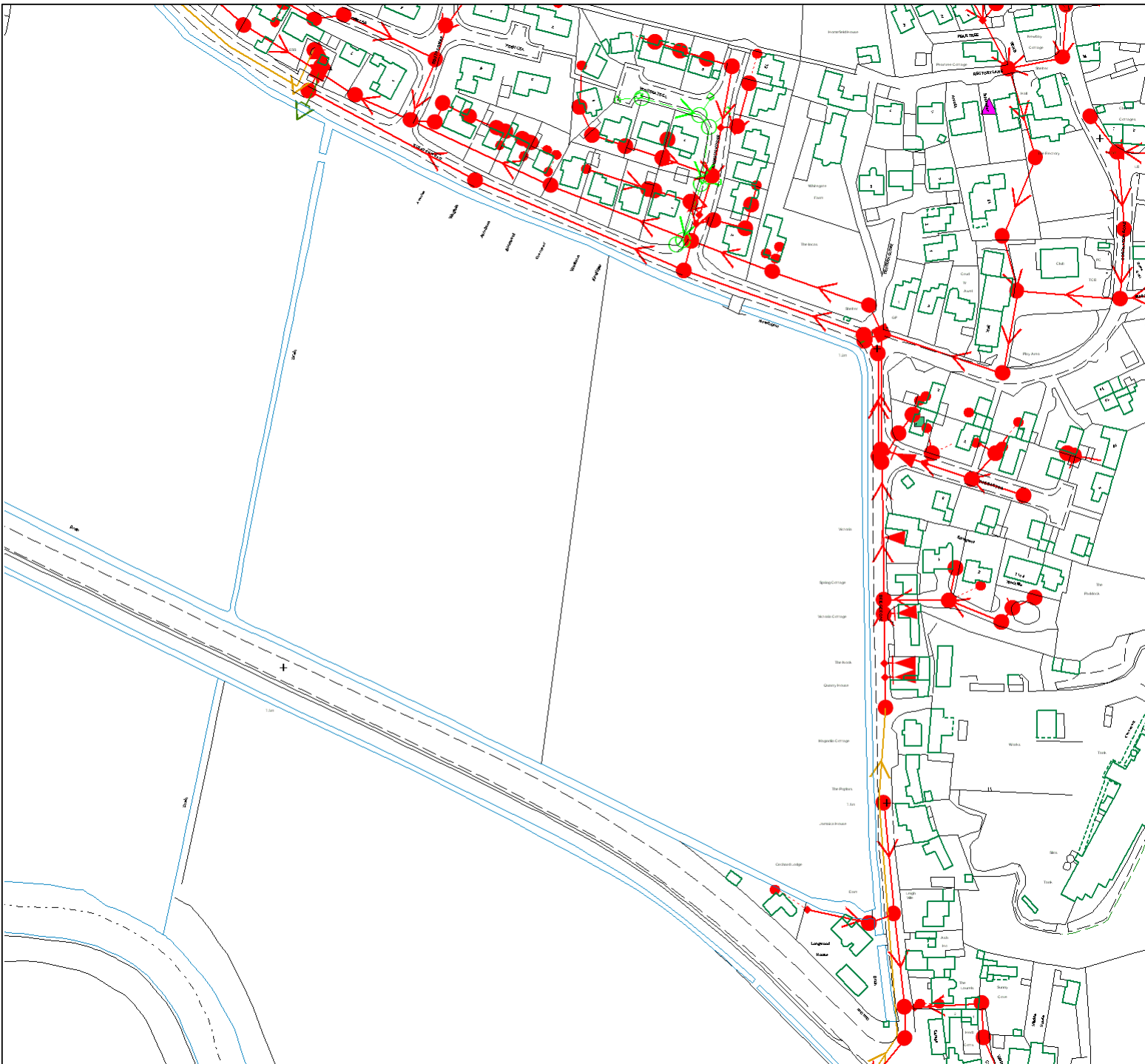
FOR COMMENT	
FOR PLANNING	
FOR TENDER	
FOR APPROVAL	
FOR CONSTRUCTION	
AS BUILT	

Scale

1:5,000 @ A4

Revision

Appendix 2



Land at Bleadon

WATER MAINS	Public	Private
Public		
Raw Water		
Abandoned		
Valve		
Hydrant		
PRV		
Meter		
SEWERS	Public - Section 104 - Private	
Foul		
Combined		
Surface		
Abandoned sewers		
OTHER WESSEX PIPES		
Rising Mains		
Effluent Disposal Main		
Overflow		
NON-WESSEX PIPES		
Private Rising Mains		
Culverted Water Course		
Highway Drain		

Information in this plan is provided for identification purposes only. No warranty as to accuracy is given or implied. The precise route of pipe work may not exactly match that shown. Wessex Water does not accept liability for inaccuracies.

Sewers and lateral drains adopted by Wessex Water under the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011 are to be plotted over time and may not yet be shown.

In carrying out any works, you accept liability for the cost of any repairs to Wessex Water apparatus damaged as a result of your works. You are advised to commence excavations using hand tools only. Mechanical digging equipment should not be used until pipe work has been precisely located.

If you are considering any form of building works and pipe work is shown within the boundary of your property or a property to be purchased (or very close by) a surveyor should plot its exact position prior to commencing works or purchase. Building over or near Wessex Water's apparatus is not normally permitted.

Printed on: 17/08/2017 12:00
Centre: 333847.00 , 156753.00
 Scale = 1:2500

Product 4 - AIMS Information

56859-WX

Date:

25/08/2017

Map Ref	Asset ID	Asset Type	Asset Description	Approx length (m)	Right or left bank	Actual fluvial downstream crest level (mAOD)	Actual fluvial downstream crest level accuracy	Actual fluvial upstream crest level (mAOD)	Actual fluvial upstream crest level accuracy	Actual fluvial coastal crest level (mAOD)	Actual fluvial coastal crest level accuracy	NGR	Most recent inspection	Overall condition
11	40818	high_ground	Natural channel	349.17	left	7.14	+/->75cm	7.21	+/->75cm	DNR	DNR	ST3238555626	24/05/2017	3
12	40819	high_ground	Wall, Concrete Pile	19.93	left	7.26	+/->75cm	7.26	+/->75cm	DNR	DNR	ST3245855653	24/05/2017	3
14	40938	high_ground	High Ground	1195.69	right	5.52	+/->75cm	6.39	+/->75cm	DNR	DNR	ST3241855669	24/05/2017	3
16	41491	high_ground	High Ground	824.74	right	4.76	+/->75cm	7.38	+/->75cm	DNR	DNR	ST3335056620	24/05/2017	3
17	52397	high_ground	Natural Bank	1505.39	left	7.52	+/->75cm	6.70	+/->75cm	DNR	DNR	ST3512955956	12/05/2017	3
19	41283	high_ground	Natural Bank	717.83	left	5.11	+/->75cm	7.50	+/->75cm	DNR	DNR	ST3464456348	12/05/2017	2
20	56172	high_ground	Embankment	168.98	right	6.43	+/- 1 to 5cm	6.44	+/- 1 to 5cm	DNR	DNR	ST3462456183	19/03/2014	2
27	159182	high_ground	Natural Channel	1420.42	left	6.73	+/- 1 to 5cm	6.98	+/- 1 to 5cm	DNR	DNR	ST3206355669	24/05/2017	2
29	184681	high_ground	High Ground	570.03	right	7.76	+/->75cm	8.05	+/->75cm	DNR	DNR	ST3406756389	12/05/2017	3
31	488852	high_ground	Causeway	109.95	right	DNR	DNR	DNR	DNR	DNR	DNR	ST3324156630	24/05/2017	2
37	1556	high_ground	Natural Bank	564.31	left	7.80	+/->75cm	5.10	+/->75cm	DNR	DNR	ST3406756371	12/05/2017	3
38	1581	high_ground	High Ground	378.89	right	8.06	+/->75cm	7.25	+/->75cm	DNR	DNR	ST3463756379	12/05/2017	3
39	1582	high_ground	High Ground	143.97	right	7.25	+/->75cm	7.01	+/->75cm	DNR	DNR	ST3498056330	12/05/2017	3
41	1584	high_ground	High Ground	324.78	right	7.01	+/->75cm	6.79	+/->75cm	DNR	DNR	ST3505056210	12/05/2017	3
42	1645	high_ground	Wall, Timber Pile	36.30	right	5.42	+/->75cm	0.51	+/->75cm	DNR	DNR	ST3238155668	24/05/2017	3
43	1646	high_ground	High Ground	92.19	right	6.40	+/->75cm	6.28	+/->75cm	DNR	DNR	ST3294056580	24/05/2017	3
44	1647	high_ground	High Ground	230.92	right	6.29	+/->75cm	4.74	+/->75cm	DNR	DNR	ST3301056640	24/05/2017	3
45	3315	high_ground	Earth Bank - Farmland	672.58	left	5.22	+/->75cm	5.17	+/->75cm	DNR	DNR	ST3463056350	19/03/2014	3
46	3316	high_ground	Embankment	280.52	right	6.36	+/- 1 to 5cm	6.60	+/- 1 to 5cm	DNR	DNR	ST3447655961	19/03/2014	3
47	1385	high_ground	High Ground	158.11	right	6.80	+/->75cm	6.35	+/->75cm	DNR	DNR	ST3522055960	12/05/2017	3
48	3317	high_ground	Embankment	300.10	right	6.38	+/- 1 to 5cm	6.96	+/- 1 to 5cm	DNR	DNR	ST3418455929	19/03/2014	3
49	3318	high_ground	Earth Bank Farmland	213.66	left	6.29	+/->75cm	5.89	+/->75cm	DNR	DNR	ST3511055970	20/01/2009	3
50	3319	high_ground	Earth Bank Farmland	224.30	right	6.85	+/->75cm	6.45	+/->75cm	DNR	DNR	ST3513055956	20/01/2009	3
51	3442	high_ground	Earth Bank Farmland	693.49	left	6.25	+/->75cm	6.41	+/->75cm	DNR	DNR	ST3499755818	20/01/2009	3
52	3443	high_ground	Earth Bank Farmland	667.22	right	5.74	+/->75cm	6.53	+/->75cm	DNR	DNR	ST3499055820	20/01/2009	3
55	3563	high_ground	Embankment	38.89	left	7.31	+/->75cm	7.41	+/->75cm	DNR	DNR	ST3241955644	24/05/2017	3
56	3564	high_ground	Abutment, Bridge	20.19	left	5.27	+/->75cm	5.27	+/->75cm	DNR	DNR	ST3243855650	24/05/2017	3
57	3565	high_ground	Natural Bank	759.35	left	7.27	+/->75cm	7.05	+/->75cm	DNR	DNR	ST3245855653	24/05/2017	3
58	3566	high_ground	Natural Bank	1806.59	left	7.08	+/->75cm	7.32	+/->75cm	DNR	DNR	ST3308056050	24/05/2017	3
60	3568	high_ground	High Ground	481.48	right	5.92	+/->75cm	5.41	+/->75cm	DNR	DNR	ST3197055840	24/05/2017	3
12	3320	simple_culvert	Culvert	11.42		DNR	DNR	DNR	DNR	DNR	DNR	ST3500055808	20/01/2009	3

Notes

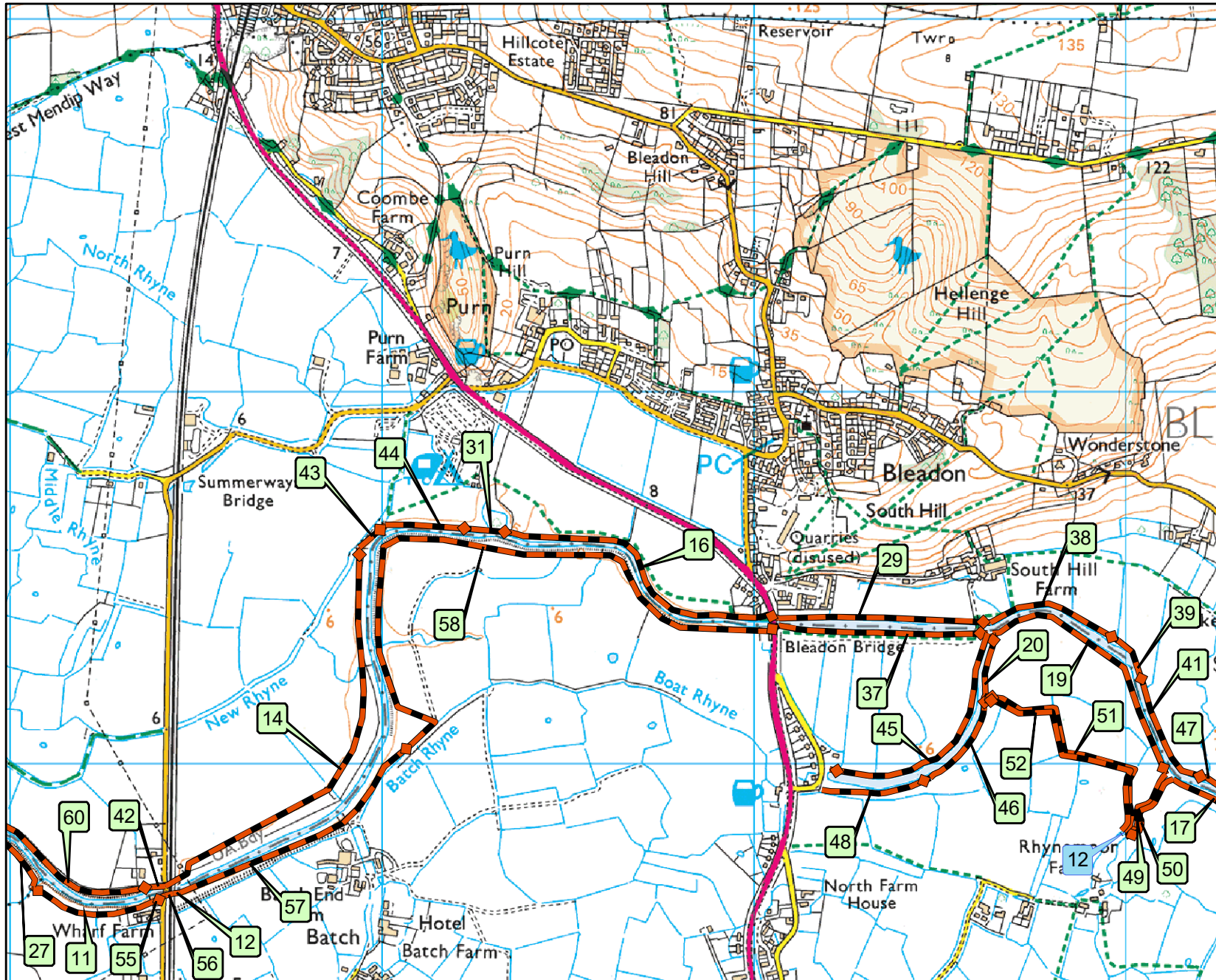
* Overall Condition has been taken from the most recent inspection

* Inspections are of a purely visual nature and do not necessarily reflect the true condition of the asset

* Condition 1 = very good, Condition 2 = good, Condition 3 = fair, Condition 4 = poor, Condition 5 = very poor

DNR = data not recorded

Current Flood Defences centred on ST3369656848, created 25/08/2017 Ref: 56859-WX



Scale: 1:15,000



Legend

Defences

ASSET_TYPE

- bridge_abutment
- barrier_beach
- cliff
- demountable
- embankment
- flood_gate
- high_ground
- promenade
- quay
- wall
- beach
- dunes

Channels

ASSET_TYPE

- open_channel
- simple_culvert

This data has been extracted from the Asset Information Management System (AIMS) which was created to draw various data sources into one database and has been populated with information of varying quality.

TITLE **Somerset Levels and Moors - Axe**
 MODEL DATE **13/07/2016**
 SOFTWARE **Flood Modeller**

SCENARIO **Defended**

NODE	01.002	01.002ds	AXE055	AXE056	AXE057	AXE058	AXE058RSpD	AXE059	AXE060	AXE061	AXE062
WATERCOURSE	River Axe	River Axe	River Axe	River Axe	River Axe	River Axe	Axe Yeo Floodplains	River Axe	River Axe	River Axe	River Axe
2YR Level	4.11	4.09	4.12	4.12	4.09	4.09	5.90	4.09	4.08	4.08	4.08
2YR Flow	19.52	19.53	18.95	19.37	19.64	20.08	0.00	20.62	21.19	22.70	24.29
5YR Level	4.45	4.43	4.46	4.46	4.43	4.43	5.92	4.42	4.42	4.42	4.42
2YR Flow	23.21	23.22	22.59	23.05	23.35	23.84	0.00	24.43	25.05	26.82	28.57
5YR Level	4.57	4.54	4.58	4.58	4.55	4.54	5.94	4.54	4.54	4.54	4.54
5YR Flow	25.09	25.10	24.47	24.93	25.23	25.73	0.00	26.34	26.99	28.81	30.61
10YR Level	4.67	4.64	4.68	4.68	4.64	4.64	5.95	4.64	4.63	4.63	4.63
10YR Flow	26.56	26.57	25.93	26.40	26.70	27.22	0.00	27.86	28.51	30.37	32.20
20YR CC20% Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
20YR CC20% Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
25YR Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
25YR Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
30YR Level	4.69	4.65	4.69	4.69	4.66	4.65	5.96	4.65	4.65	4.65	4.65
30YR Flow	27.32	27.32	26.68	27.15	27.45	27.99	0.00	28.64	29.29	31.17	32.99
50YR Level	4.73	4.70	4.73	4.73	4.70	4.70	5.97	4.69	4.69	4.69	4.69
50YR Flow	28.24	28.24	27.60	28.07	28.37	28.92	0.00	29.56	30.22	32.10	33.92
75YR Level	4.75	4.71	4.75	4.75	4.72	4.71	5.98	4.71	4.71	4.71	4.71
75YR Flow	29.03	29.04	28.40	28.87	29.16	29.70	0.00	30.35	31.00	32.88	34.67
100YR Level	4.78	4.75	4.79	4.78	4.75	4.74	5.99	4.74	4.74	4.74	4.74
100YR Flow	29.64	29.65	29.03	29.48	29.78	30.31	0.00	30.95	31.59	33.44	35.19
100YR CC20% Level	4.90	4.87	4.91	4.91	4.87	4.87	6.01	4.87	4.87	4.86	4.86
100YR CC20% Flow	31.34	31.35	30.77	31.20	31.47	31.98	0.00	32.59	33.20	34.95	36.58
100YR CC30% Level	4.96	4.93	4.97	4.97	4.93	4.93	6.03	4.92	4.92	4.92	4.92
100YR CC30% Flow	31.77	31.77	31.19	31.61	31.89	32.41	0.00	33.00	33.58	35.32	36.94
100YR CC40% Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
100YR CC40% Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
200YR Level	4.79	4.75	4.79	4.79	4.76	4.75	6.01	4.75	4.75	4.75	4.75
200YR Flow	30.86	30.87	30.28	30.71	30.99	31.50	0.00	32.11	32.71	34.51	36.17
200YR CC20% Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
200YR CC20% Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
500YR Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
500YR Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
1000YR Level	4.96	4.92	4.96	4.96	4.92	4.92	6.07	4.92	4.92	4.92	4.91
1000YR Flow	32.94	32.95	32.40	32.80	33.06	33.52	0.00	34.08	34.64	36.40	37.94
1000YR CC20% Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
1000YR CC20% Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
TIDE200YR	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
TIDE1000YR	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
Eastings	334079	334046	334367	334167	333967	333772	333735	333659	333466	333269	333069
Northings	156837	156376	156378	156378	156376	156377	156405	156564	156588	156613	156629

NMD No Modelled Data

SCENARIO **Undeferred**

NODE	01.002	01.002ds	AXE055	AXE056	AXE057	AXE058	AXE058RSpD	AXE059	AXE060	AXE061	AXE062
WATERCOURSE	River Axe	River Axe	River Axe	River Axe	River Axe	River Axe	Axe Yeo Floodplains	River Axe	River Axe	River Axe	River Axe
2YR Level	4.23	4.21	4.24	4.24	4.21	4.21	5.90	4.21	4.21	4.21	4.20
2YR Flow	17.50	17.50	16.94	17.35	17.62	18.04	0.00	18.53	19.06	20.42	21.85
5YR Level	4.33	4.31	4.34	4.33	4.31	4.31	5.92	4.30	4.30	4.30	4.30
2YR Flow	19.77	19.78	19.12	19.61	19.90	20.38	0.00	20.94	21.52	23.16	24.77
5YR Level	4.41	4.39	4.42	4.42	4.39	4.39	5.94	4.39	4.38	4.38	4.38
5YR Flow	21.29	21.30	20.61	21.11	21.42	21.92	0.00	22.52	23.13	24.84	26.50
10YR Level	4.46	4.44	4.47	4.47	4.44	4.44	5.95	4.44	4.43	4.43	4.43
10YR Flow	22.17	22.18	21.49	21.99	22.31	22.81	0.00	23.42	24.03	25.76	27.41
20YR CC20% Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
20YR CC20% Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
25YR Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
25YR Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
30YR Level	4.47	4.45	4.48	4.48	4.45	4.45	5.96	4.45	4.44	4.44	4.44
30YR Flow	22.23	22.24	21.63	22.07	22.36	22.84	0.00	23.41	24.03	25.79	27.47
50YR Level	4.52	4.49	4.53	4.52	4.49	4.49	5.97	4.49	4.49	4.49	4.48
50YR Flow	23.36	23.36	22.73	23.19	23.49	23.98	0.00	24.58	25.20	27.03	28.75
75YR Level	4.56	4.54	4.57	4.57	4.54	4.53	5.98	4.53	4.53	4.53	4.53
75YR Flow	24.25	24.25	23.65	24.09	24.37	24.85	0.00	25.45	26.08	27.94	29.70
100YR Level	4.62	4.59	4.62	4.62	4.59	4.59	5.99	4.58	4.58	4.58	4.58
100YR Flow	25.11	25.12	24.48	24.95	25.25	25.76	0.00	26.39	27.03	28.91	30.70
100YR CC20% Level	4.87	4.84	4.88	4.88	4.84	4.84	6.01	4.84	4.84	4.84	4.83
100YR CC20% Flow	28.50	28.51	27.90	28.34	28.63	29.17	0.00	29.81	30.44	32.34	34.11
100YR CC30% Level	4.97	4.94	4.98	4.98	4.94	4.94	6.03	4.94	4.93	4.93	4.93
100YR CC30% Flow	30.12	30.13	29.57	29.97	30.25	30.77	0.00	31.39	32.00	33.82	35.52
100YR CC40% Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
100YR CC40% Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
200YR Level	4.67	4.64	4.68	4.68	4.65	4.64	6.01	4.64	4.64	4.64	4.63
200YR Flow	26.67	26.68	26.04	26.51	26.81	27.34	0.00	27.99	28.64	30.55	32.36
200YR CC20% Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
200YR CC20% Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
500YR Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
500YR Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
1000YR Level	4.97	4.94	4.98	4.98	4.94	4.94	6.07	4.93	4.93	4.93	4.93
1000YR Flow	31.70	31.71	31.22	31.58	31.81	32.23	0.00	32.78	33.36	35.13	36.75
1000YR CC20% Level	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
1000YR CC20% Flow	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
TIDE200YR	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
TIDE1000YR	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD	NMD
Eastings	334079	334046	334367	334167	333967	333772	333735	333659	333466	333269	333069
Northings	156837	156376	156378	156378	156376	156377	156405	156564	156588	156613	156629

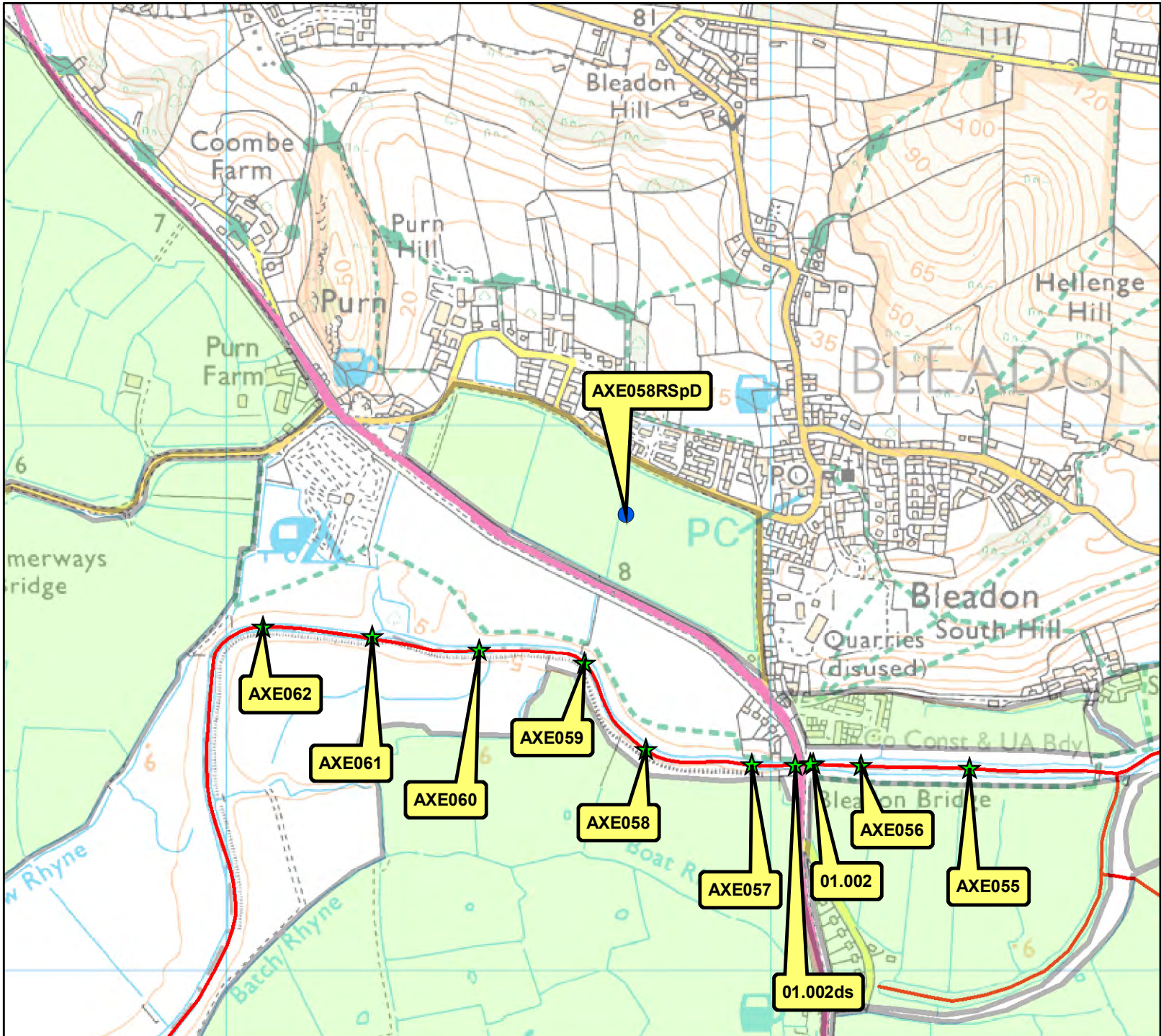
NMD No Modelled Data

of confidence

Moderate

The model was produced to assess our flood risk management assets and the results are fit for this purpose. We have MODERATE confidence in its input data, and subsequently its results. The reason that we have MODERATE confidence in the model and its results is because the model requires verification against a known flood event. You will need to contact our Partnership and Strategic Overview Team to discuss whether the flood levels from this model are suitable for your FRA or whether they require you to carry out further work to update the modelling.

Node location map centred on ST 33696 56848 - created 21/08/2017 [Ref: 56859-WX]










Scale: 1:10,000



Legend

56859-WX_selected_nodes

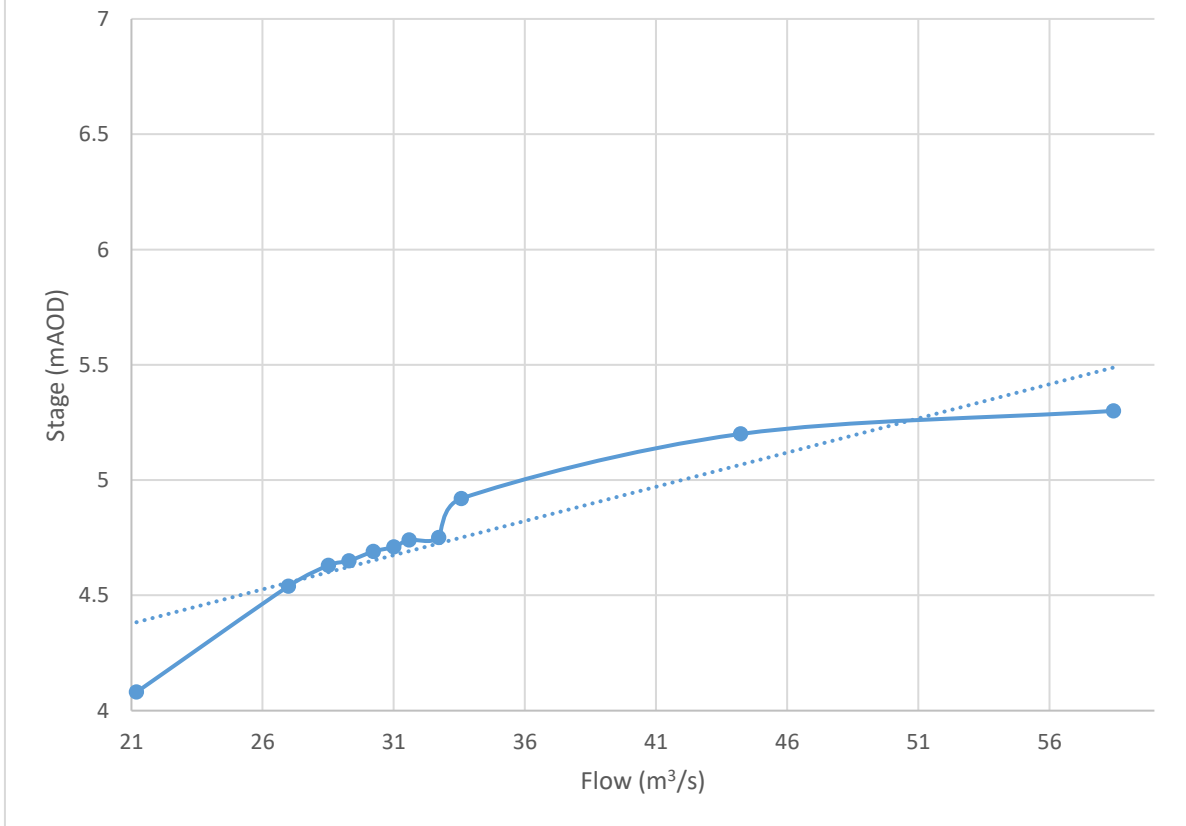
NODE_TYPE

-  1D_RiverSection
-  2D_RiverSection
-  Interpolate
-  Replicate
-  Reservoir
-  AxeYeo_ReservoirUnits
-  Main River

Modelled Flood Level Nodes

A table that references the node locations/unique identifiers is also attached, giving associated flood levels, NGRs and further information for the river channel and model.

Stage Discharge Curve for AXE - Node Point AXE060



Year	Flow	Stage
2yr	21.19	4.08
5yr	26.99	4.54
10yr	28.51	4.63
30yr	29.29	4.65
50yr	30.22	4.69
75yr	31	4.71
100yr	31.59	4.74
200yr	32.71	4.75
1000yr	33.58	4.92
100yr+ 40	44.226	5.2
100yr + 85	58.44	5.3

Sarah Seed

Subject: FW: RE: Land at Bleadon - IDB comments on surcharged level modelling.
Attachments: image001.jpg; image002.jpg

From: Simon Bunn
Sent: 19 December 2017 15:05
To: Dean Frosoni
Cc: Nick Jackson
Subject: RE: Land at Bleadon - IDB comments on surcharged level modelling.

Dean,

The Board can agree on those levels.

Kind regards,

Simon

Simon Bunn

Development Control Officer
Axe Brue and Parrett Internal Drainage Boards
Bradbury House
33-34 Market Street
Highbridge
Somerset TA9 3BW

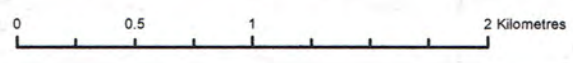
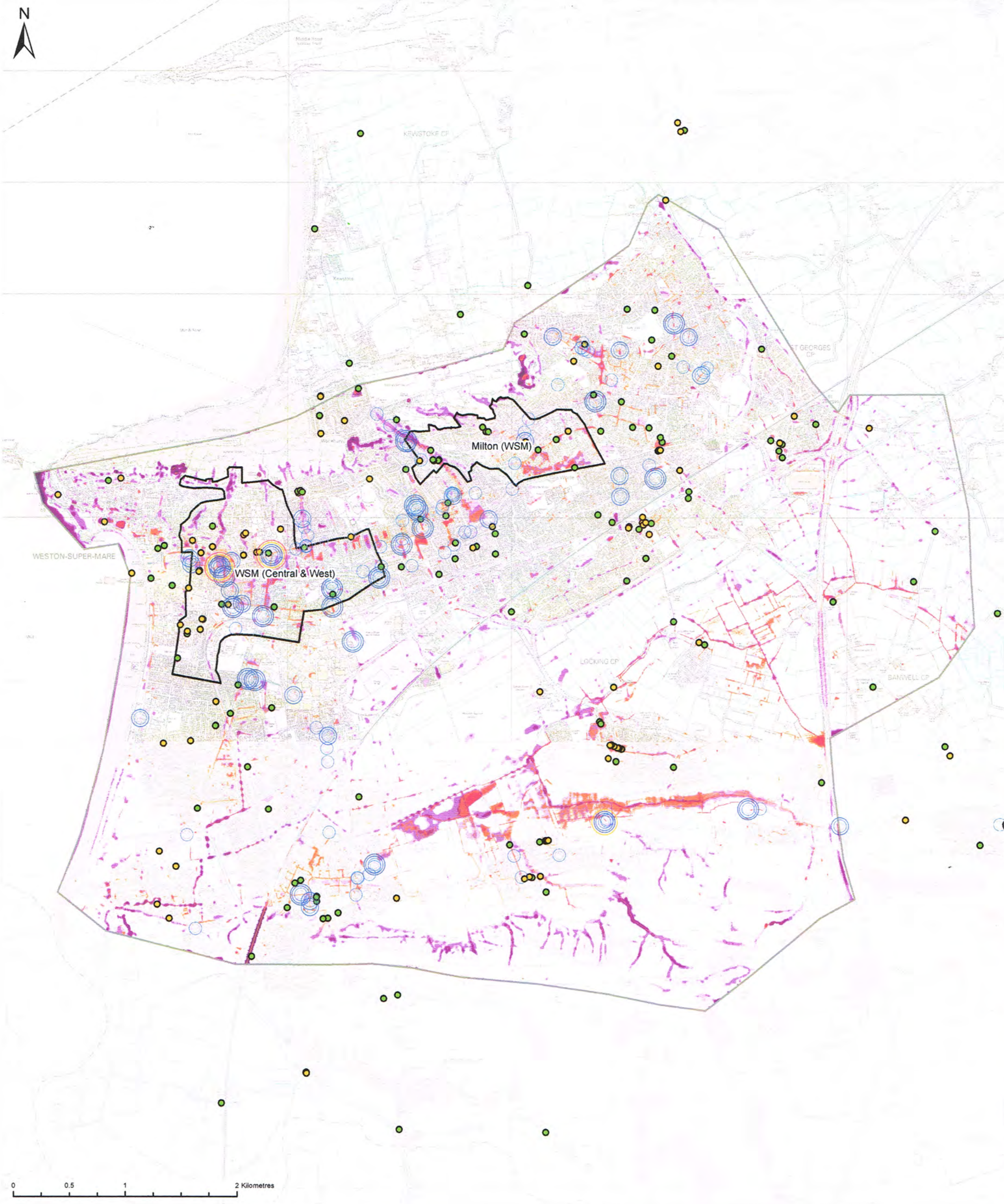


Web: www.somersetdrainageboards.gov.uk

From: Dean Frosoni
Sent: 15 December 2017 14:05
To: Simon Bunn
Cc: Nick Jackson
Subject: RE: Land at Bleadon - IDB comments on surcharged level modelling.

Simon

We have now rerun the Microdrainage network analysis incorporating greenfield runoff from the wider catchment using an ReFH generated hydrograph and FEH catchment descriptors. The catchment (142 ha) is shown in the screenshot below.



Legend

- Internal Flooding Reports
- External Flooding Reports
- ▭ Sub Areas
- ▭ Weston Super Mare Area
- uFMfSW, 1:100 Flood Depth (m)
- 0.00 - 0.15
- 0.15 - 0.30
- 0.30 - 0.60
- 0.60 - 0.90
- 0.90 - 1.20
- > 1.20

SWMP Modelling, 1:100 Flood Depth (m)

- 0.10 - 0.15
- 0.15 - 0.30
- 0.30 - 0.60
- 0.60 - 0.90
- 0.90 - 1.20
- > 1.20

Wessex Water Modelling Manhole Surcharge Flood Volumes

- >1000m³
- >500m³
- >300m³
- >200m³
- >100m³
- >25m³

RESTRICTED - COMMERCIALY SENSITIVE

Title
SWMP Modelling 1 in 100 Year Flood Depth and uFMfSW 1 in 100 Year Flood Depth Comparison

Project
Weston Super Mare Surface Water Management Plan (SWMP)

Client
North Somerset Council

Date
28/03/2014

Scale @ A3
1:31500

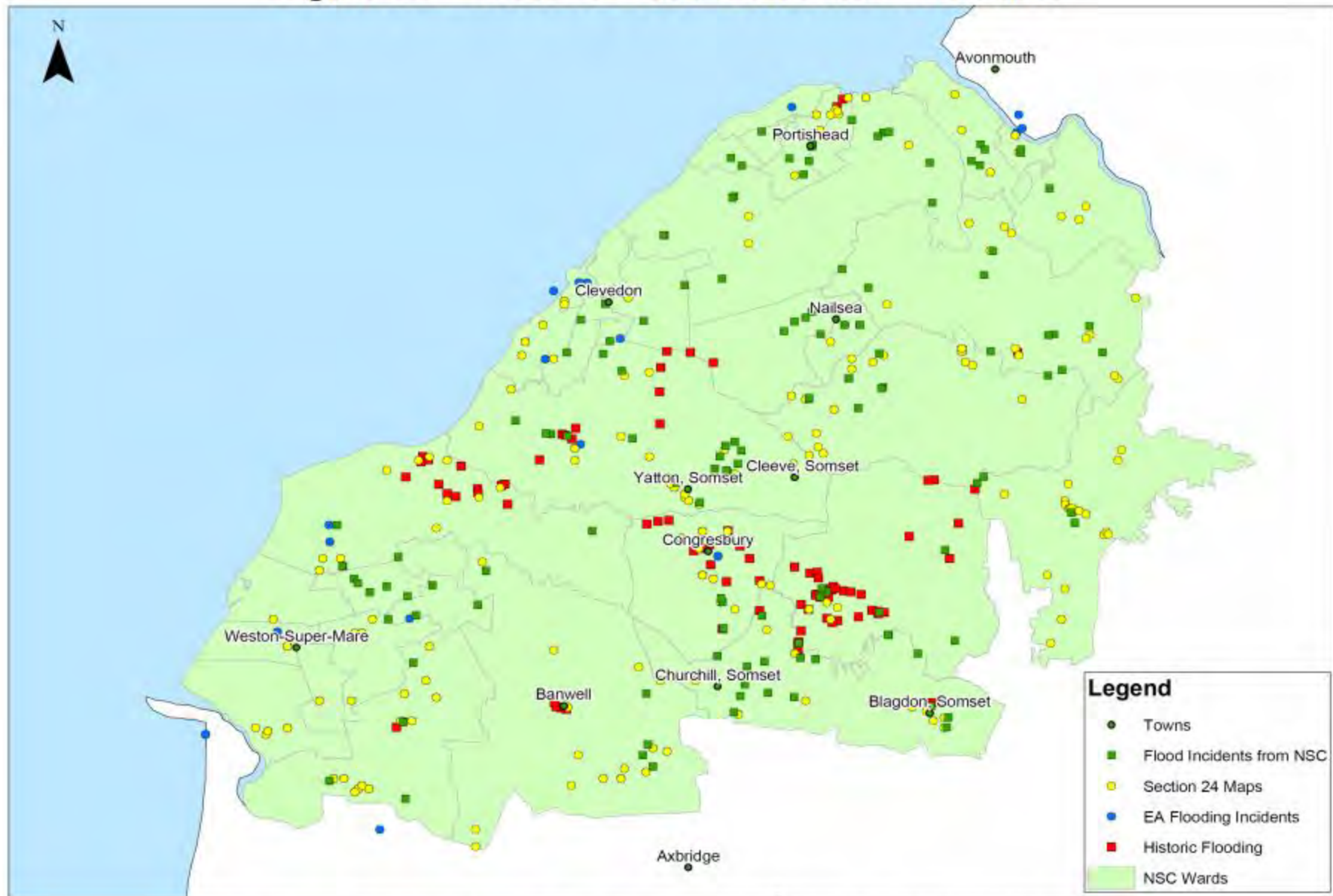
Figure
2

Checked by	Version
NW	1




Path: L:\Sites\UK-Exeter\Project\9\0329\Technical_Data\T5_GIS\Projects\Surface Water Comparison Maps and EA Maps 260214\Figures for Report\Figure 2 - 1 in 100yr Depth Comparison inc WMMD.mxd

Figure 3.2 – Historic Flood Incidents in NSC area



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Appendix 3

160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon GFRR - Eastern Catchment	
Date 13/02/2018 15:53 File	Designed by njackson Checked by DF	

XP Solutions	Source Control 2016.1
--------------	-----------------------

ICP SUDS Mean Annual Flood

Input

Return Period (years)	100	Soil	0.400
Area (ha)	1.669	Urban	0.000
SAAR (mm)	750	Region Number	Region 8

Results 1/s

QBAR Rural	6.2
QBAR Urban	6.2

Q100 years 14.9

Q1 year	4.8
Q30 years	11.7
Q100 years	14.9

160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleasdon GFRR (Western Catchment)
---	---



Date 13/02/2018 15:57 File	Designed by njackson Checked by DF
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XP Solutions	Source Control 2016.1
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ICP SUDS Mean Annual Flood

Input


Return Period (years)	100	Soil	0.400
Area (ha)	2.297	Urban	0.000
SAAR (mm)	750	Region Number	Region 8

Results 1/s

QBAR Rural	8.5
QBAR Urban	8.5

Q100 years 20.5

Q1 year	6.6
Q30 years	16.1
Q100 years	20.5

Cole Easdon Consultants		Page 1
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon Rhyne Modelling	
Date 22/06/2018 16:32 File 5897 - Network (2 ditch...	Designed by njackson Checked by DF	
XP Solutions	Network 2016.1	

STORM SEWER DESIGN by the Modified Rational Method

Design Criteria for Storm






Pipe Sizes STANDARD Manhole Sizes STANDARD

FSR Rainfall Model - England and Wales

Return Period (years)	100	Add Flow / Climate Change (%)	0
M5-60 (mm)	19.400	Minimum Backdrop Height (m)	0.200
Ratio R	0.350	Maximum Backdrop Height (m)	1.500
Maximum Rainfall (mm/hr)	50	Min Design Depth for Optimisation (m)	1.200
Maximum Time of Concentration (mins)	30	Min Vel for Auto Design only (m/s)	1.00
Foul Sewage (l/s/ha)	0.000	Min Slope for Optimisation (1:X)	500
Volumetric Runoff Coeff.	0.750		


Designed with Level Soffits

Network Design Table for Storm

PN	Length (m)	Fall (m)	Slope (1:X)	I.Area (ha)	T.E. (mins)	Base Flow (l/s)	k (mm)	HYD SECT	DIA (mm)	Section Type	Auto Design
1.000	224.000	0.440	509.1	1.669	1.00	0.0	0.600	\	-19	Pipe/Conduit	
1.001	1.000	0.002	500.0	0.000	0.00	0.0	0.600	\	-19	Pipe/Conduit	
2.000	221.000	0.433	510.4	2.297	1.00	0.0	0.600	\	-22	Pipe/Conduit	
2.001	1.000	0.002	500.0	0.000	0.00	0.0	0.600	\	-22	Pipe/Conduit	
1.002	1.000	0.002	500.0	0.000	0.00	0.0	0.600	\	-22	Pipe/Conduit	

Network Results Table

PN	Rain (mm/hr)	T.C. (mins)	US/IL E (m)	I.Area (ha)	Σ Base Flow (l/s)	Foul (l/s)	Add Flow (l/s)	Vel (m/s)	Cap (l/s)	Flow (l/s)
1.000	50.00	2.13	5.740	1.669	0.0	0.0	0.0	3.31	59059.7	226.0
1.001	50.00	2.13	5.300	1.669	0.0	0.0	0.0	3.34	59596.3	226.0
2.000	50.00	2.09	5.733	2.297	0.0	0.0	0.0	3.38	78807.3	311.0
2.001	50.00	2.09	5.300	2.297	0.0	0.0	0.0	3.41	79625.2	311.0
1.002	50.00	2.14	5.298	3.966	0.0	0.0	0.0	3.41	79625.2	537.0


Cole Easdon Consultants		Page 2
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon Rhyne Modelling	
Date 22/06/2018 16:32 File 5897 - Network (2 ditch...	Designed by njackson Checked by DF	
XP Solutions	Network 2016.1	

Conduit Sections for Storm

NOTE: Diameters less than 66 refer to section numbers of hydraulic conduits. These conduits are marked by the symbols:- [] box culvert, \ / open channel, oo dual pipe, ooo triple pipe, O egg.

Section numbers < 0 are taken from user conduit table

Section Number	Conduit Type	Major Dimn. (mm)	Minor Dimn. (mm)	Side Slope (Deg)	Corner Splay (mm)	4*Hyd Radius (m)	XSect Area (m ²)
-19	\ /	18400	1100			3.768	17.820
-22	\ /	23400	1100			3.900	23.320

Cole Easdon Consultants		Page 3
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon Rhyne Modelling	
Date 22/06/2018 16:32 File 5897 - Network (2 ditch...	Designed by njackson Checked by DF	
XP Solutions	Network 2016.1	

Manhole Schedules for Storm


MH Name	MH CL (m)	MH Depth (m)	MH Connection	MH Diam.,L*W (mm)	PN	Pipe Out Invert Level (m)	Pipe Out Diameter (mm)	PN	Pipes In Invert Level (m)	Diameter (mm)	Backdr (mm)
East Swale	6.400	0.660	Junction		1.000	5.740	-19				
FC1	6.400	1.100	Junction		1.001	5.300	-19	1.000	5.300	-19	
West Swale	6.400	0.667	Junction		2.000	5.733	-22				
FC2	6.400	1.100	Junction		2.001	5.300	-22	2.000	5.300	-22	
Dummy	6.400	1.102	Junction	0	1.002	5.298	-22	1.001	5.298	-19	
								2.001	5.298	-22	
	6.400	1.104	Open Manhole	0		OUTFALL		1.002	5.296	-22	

Surcharged Outfall Details for Storm

Outfall Pipe Number	Outfall Name	C. Level (m)	I. Level (m)	Min I. Level (m)	D,L (mm)	W (mm)
1.002		6.400	5.296	0.000	0	0


Datum (m) 0.000 Offset (mins) 0

Time (mins)	Depth (m)	Time (mins)	Depth (m)	Time (mins)	Depth (m)	Time (mins)	Depth (m)	Time (mins)	Depth (m)	Time (mins)	Depth (m)
60	6.214	1440	6.214	2820	6.214	4200	6.214	5580	6.214	6960	6.214
120	6.214	1500	6.214	2880	6.214	4260	6.214	5640	6.214	7020	6.214
180	6.214	1560	6.214	2940	6.214	4320	6.214	5700	6.214	7080	6.214
240	6.214	1620	6.214	3000	6.214	4380	6.214	5760	6.214	7140	6.214
300	6.214	1680	6.214	3060	6.214	4440	6.214	5820	6.214	7200	6.214
360	6.214	1740	6.214	3120	6.214	4500	6.214	5880	6.214	7260	6.214
420	6.214	1800	6.214	3180	6.214	4560	6.214	5940	6.214	7320	6.214
480	6.214	1860	6.214	3240	6.214	4620	6.214	6000	6.214	7380	6.214
540	6.214	1920	6.214	3300	6.214	4680	6.214	6060	6.214	7440	6.214
600	6.214	1980	6.214	3360	6.214	4740	6.214	6120	6.214	7500	6.214
660	6.214	2040	6.214	3420	6.214	4800	6.214	6180	6.214	7560	6.214
720	6.214	2100	6.214	3480	6.214	4860	6.214	6240	6.214	7620	6.214
780	6.214	2160	6.214	3540	6.214	4920	6.214	6300	6.214	7680	6.214
840	6.214	2220	6.214	3600	6.214	4980	6.214	6360	6.214	7740	6.214
900	6.214	2280	6.214	3660	6.214	5040	6.214	6420	6.214	7800	6.214
960	6.214	2340	6.214	3720	6.214	5100	6.214	6480	6.214	7860	6.214
1020	6.214	2400	6.214	3780	6.214	5160	6.214	6540	6.214	7920	6.214
1080	6.214	2460	6.214	3840	6.214	5220	6.214	6600	6.214	7980	6.214
1140	6.214	2520	6.214	3900	6.214	5280	6.214	6660	6.214	8040	6.214
1200	6.214	2580	6.214	3960	6.214	5340	6.214	6720	6.214	8100	6.214
1260	6.214	2640	6.214	4020	6.214	5400	6.214	6780	6.214	8160	6.214
1320	6.214	2700	6.214	4080	6.214	5460	6.214	6840	6.214	8220	6.214
1380	6.214	2760	6.214	4140	6.214	5520	6.214	6900	6.214	8280	6.214

Cole Easdon Consultants		Page 4
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon Rhyne Modelling	
Date 22/06/2018 16:32 File 5897 - Network (2 ditch...	Designed by njackson Checked by DF	
XP Solutions	Network 2016.1	

Surcharged Outfall Details for Storm

Time (mins)	Depth (m)	Time (mins)	Depth (m)	Time (mins)	Depth (m)	Time (mins)	Depth (m)	Time (mins)	Depth (m)	Time (mins)	Depth (m)
8340	6.214	8640	6.214	8940	6.214	9240	6.214	9540	6.214	9840	6.214
8400	6.214	8700	6.214	9000	6.214	9300	6.214	9600	6.214	9900	6.214
8460	6.214	8760	6.214	9060	6.214	9360	6.214	9660	6.214	9960	6.214
8520	6.214	8820	6.214	9120	6.214	9420	6.214	9720	6.214	10020	6.214
8580	6.214	8880	6.214	9180	6.214	9480	6.214	9780	6.214	10080	6.214

Cole Easdon Consultants		Page 5
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon Rhyne Modelling	
Date 22/06/2018 16:32 File 5897 - Network (2 ditch...	Designed by njackson Checked by DF	
XP Solutions	Network 2016.1	


Online Controls for Storm

Orifice Manhole: FC1, DS/PN: 1.001, Volume (m³): 3991.7

Diameter (m) 0.056 Discharge Coefficient 0.600 Invert Level (m) 5.300

Orifice Manhole: FC2, DS/PN: 2.001, Volume (m³): 5153.7

Diameter (m) 0.066 Discharge Coefficient 0.600 Invert Level (m) 5.300

Cole Easdon Consultants		Page 6
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon Rhyne Modelling	
Date 22/06/2018 16:32 File 5897 - Network (2 ditch...	Designed by njackson Checked by DF	
XP Solutions	Network 2016.1	

Summary of Critical Results by Maximum Level (Rank 1) for Storm

Simulation Criteria

Areal Reduction Factor 1.000 Additional Flow - % of Total Flow 0.000
Hot Start (mins) 0 MADD Factor * 10m³/ha Storage 2.000
Hot Start Level (mm) 0 Inlet Coefficient 0.800
Manhole Headloss Coeff (Global) 0.500 Flow per Person per Day (l/per/day) 0.000
Foul Sewage per hectare (l/s) 0.000

Number of Input Hydrographs 0 Number of Storage Structures 0
Number of Online Controls 2 Number of Time/Area Diagrams 0
Number of Offline Controls 0 Number of Real Time Controls 0

Synthetic Rainfall Details

Rainfall Model FSR Ratio R 0.350
Return Period (years) 100 Cv (Summer) 0.750
Region England and Wales Cv (Winter) 0.840
M5-60 (mm) 19.200


Margin for Flood Risk Warning (mm) 300.0
Analysis Timestep 2.5 Second Increment (Extended)
DTS Status ON
DVD Status ON
Inertia Status OFF

Profile(s) Summer and Winter
Duration(s) (mins) 15, 30, 60, 120, 180, 240, 360, 480, 600,
720, 960, 1440, 2160, 2880, 4320, 5760,
7200, 8640, 10080

Sensitivity flows(s) (%) 0, +40

PN	US/MH Name	Storm	Climate Change	First (X) Surcharge	First (Y) Flood	First (Z) Overflow	Overflow Act.	Water Level (m)
1.000	East Swale	10080 Winter	+40%					6.261
1.001	FC1	10080 Winter	+40%					6.261
2.000	West Swale	10080 Winter	+40%					6.277
2.001	FC2	10080 Winter	+40%					6.277
1.002	Dummy	7200 Winter	+40%					6.214

PN	US/MH Name	Surcharged Depth (m)	Flooded Volume (m ³)	Flow / Cap.	Overflow (l/s)	Pipe Flow (l/s)	Status	Level Exceeded
1.000	East Swale	-0.579	0.000	0.00		10.7	FLOOD RISK*	
1.001	FC1	-0.139	0.000	0.00		6.1	FLOOD RISK*	
2.000	West Swale	-0.556	0.000	0.00		14.7	FLOOD RISK*	
2.001	FC2	-0.123	0.000	0.00		8.5	FLOOD RISK*	
1.002	Dummy	-0.184	0.000	0.00		193.5	FLOOD RISK*	

Cole Easdon Consultants		Page 1
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon IDB Drain 360 min + 40%	
Date 15/12/2017 13:45 File 5897 - Network IDB Drai...	Designed by njackson Checked by DF	
XP Solutions	Network 2015.1	

STORM SEWER DESIGN by the Modified Rational Method

Design Criteria for Storm

Pipe Sizes STANDARD Manhole Sizes STANDARD










FSR Rainfall Model - England and Wales

Return Period (years)	100	Add Flow / Climate Change (%)	40
M5-60 (mm)	19.100	Minimum Backdrop Height (m)	0.200
Ratio R	0.350	Maximum Backdrop Height (m)	1.500
Maximum Rainfall (mm/hr)	50	Min Design Depth for Optimisation (m)	1.200
Maximum Time of Concentration (mins)	30	Min Vel for Auto Design only (m/s)	1.00
Foul Sewage (l/s/ha)	0.000	Min Slope for Optimisation (1:X)	500
Volumetric Runoff Coeff.	0.750		

Designed with Level Soffits


Network Design Table for Storm

« - Indicates pipe capacity < flow













PN	Length (m)	Fall (m)	Slope (1:X)	I.Area (ha)	T.E. (mins)	Base Flow (l/s)	k (mm)	HYD SECT	DIA (mm)	Auto Design
1.000	25.890	0.000	0.0	0.017	1.00	0.9	0.600	\	-16	
1.001	41.310	0.000	0.0	0.028	0.00	1.3	0.600	\	-16	
1.002	28.780	0.000	0.0	0.017	0.00	0.8	0.600	\	-16	
1.003	43.150	0.000	0.0	0.025	0.00	1.3	0.600	\	-16	
1.004	63.250	0.000	0.0	0.036	0.00	1.6	0.600	\	-16	
1.005	45.860	0.000	0.0	0.025	0.00	0.9	0.600	\	-16	
1.006	274.500	0.000	0.0	0.155	0.00	9.0	0.600	\	-16	
1.007	148.690	0.000	0.0	0.080	0.00	59.2	0.600	\	-16	
2.000	235.600	0.150	1570.7	0.000	1.00	0.0	0.600	\	-16	

Network Results Table

PN	Rain (mm/hr)	T.C. (mins)	US/IL E (m)	I.Area (ha)	Σ Base Flow (l/s)	Foul (l/s)	Add Flow (l/s)	Vel (m/s)	Cap (l/s)	Flow (l/s)
1.000	50.00	1.55	5.450	0.017	0.9	0.0	1.3	0.78	5994.1	4.5
1.001	50.00	2.44	5.450	0.045	2.2	0.0	3.3	0.78	5994.1	11.6
1.002	50.00	3.05	5.450	0.062	3.0	0.0	4.6	0.78	5994.1	16.0
1.003	50.00	3.98	5.450	0.087	4.3	0.0	6.4	0.78	5994.1	22.5
1.004	50.00	5.33	5.450	0.123	5.9	0.0	9.0	0.78	5994.1	31.6
1.005	50.00	6.31	5.450	0.148	6.8	0.0	10.7	0.78	5994.1	37.6
1.006	50.00	12.18	5.450	0.303	15.8	0.0	22.7	0.78	5994.1	79.6
1.007	50.00	15.37	5.450	0.383	75.0	0.0	50.7	0.78	5994.1	177.6
2.000	50.00	2.99	5.600	0.000	0.0	0.0	0.0	1.97	15188.3	0.0

Cole Easdon Consultants		Page 2
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon IDB Drain 360 min + 40%	
Date 15/12/2017 13:45 File 5897 - Network IDB Drai...	Designed by njackson Checked by DF	
XP Solutions	Network 2015.1	

Network Design Table for Storm

PN	Length (m)	Fall (m)	Slope (1:X)	I.Area (ha)	T.E. (mins)	Base Flow (l/s)	k (mm)	HYD SECT	DIA (mm)	Auto Design
1.008	23.220	0.000	0.0	0.010	0.00	50.7	0.600	\	-16	
1.009	51.970	0.000	0.0	0.028	0.00	3.0	0.600	\	-16	
1.010	216.980	0.000	0.0	0.113	0.00	12.3	0.600	\	-16	
3.000	71.880	0.000	0.0	0.000	1.00	0.5	0.600	\	-16	
1.011	10.000	0.010	1000.0	0.000	0.00	0.0	0.600	o	1050	
4.000	99.980	0.020	4999.0	0.094	1.00	3.5	0.600	\	-16	
4.001	161.940	0.033	4907.3	0.133	0.00	7.5	0.600	\	-16	
4.002	188.230	0.047	4004.9	0.176	0.00	8.5	0.600	\	-16	
4.003	178.980	0.127	1409.3	0.167	0.00	6.5	0.600	\	-16	
4.004	62.020	0.013	4770.8	0.067	0.00	1.3	0.600	\	-16	
4.005	10.000	0.024	410.0	0.000	0.00	0.0	0.600	o	450	
1.012	1.000	0.001	1010.0	0.000	0.00	0.0	0.600	o	1050	

Network Results Table


PN	Rain (mm/hr)	T.C. (mins)	US/IL E (m)	I.Area (ha)	E Base Flow (l/s)	Foul (l/s)	Add Flow (l/s)	Vel (m/s)	Cap (l/s)	Flow (l/s)
1.008	50.00	15.86	5.450	0.393	125.7	0.0	71.6	0.78	5994.1	250.5
1.009	50.00	16.97	5.450	0.421	128.7	0.0	74.3	0.78	5994.1	260.0
1.010	50.00	21.62	5.450	0.534	141.0	0.0	85.3	0.78	5994.1	298.6
3.000	50.00	2.54	5.450	0.000	0.5	0.0	0.2	0.78	5994.1	0.7
1.011	50.00	21.77	5.450	0.534	141.5	0.0	85.5	1.08	936.3	299.3
4.000	50.00	2.51	5.700	0.094	3.5	0.0	6.5	1.10	8472.0	22.7
4.001	50.00	4.94	5.680	0.227	11.0	0.0	16.7	1.11	8551.7	58.4
4.002	50.00	7.49	5.647	0.403	19.5	0.0	29.6	1.23	9476.2	103.7
4.003	50.00	8.92	5.600	0.570	26.0	0.0	41.3	2.08	16039.8	144.5
4.004	50.00	9.84	5.473	0.637	27.3	0.0	45.4	1.13	8674.5	159.0
4.005	50.00	10.00	5.460	0.637	27.3	0.0	45.4	1.00	158.7	159.0
1.012	50.00	21.79	5.441	1.171	168.8	0.0	130.9	1.08	931.6	458.3

Manhole Schedules for Storm

MH Name	MH CL (m)	MH Depth (m)	MH Connection	MH Diam., L*W (mm)	Pipe Out			Pipes In			Backdrop (mm)
					PN	Invert Level (m)	Diameter (mm)	PN	Invert Level (m)	Diameter (mm)	
S1.000	7.200	1.750	Junction		1.000	5.450	-16				
S1.001	7.200	1.750	Junction		1.001	5.450	-16	1.000	5.450	-16	
S1.002	7.200	1.750	Junction		1.002	5.450	-16	1.001	5.450	-16	
S1.003	7.200	1.750	Junction		1.003	5.450	-16	1.002	5.450	-16	
S1.004	7.200	1.750	Junction		1.004	5.450	-16	1.003	5.450	-16	
S1.005	7.200	1.750	Junction		1.005	5.450	-16	1.004	5.450	-16	
S1.006	7.200	1.750	Junction		1.006	5.450	-16	1.005	5.450	-16	
S1.007	7.200	1.750	Junction		1.007	5.450	-16	1.006	5.450	-16	
S2.000	7.200	1.600	Junction		2.000	5.600	-16				
S1.008	7.200	1.750	Junction		1.008	5.450	-16	1.007	5.450	-16	
								2.000	5.450	-16	
S1.009	7.200	1.750	Junction		1.009	5.450	-16	1.008	5.450	-16	
S1.010	7.200	1.750	Junction		1.010	5.450	-16	1.009	5.450	-16	
S3.000	7.200	1.750	Junction		3.000	5.450	-16				
S1.011	7.200	1.750	Junction		1.011	5.450	1050	1.010	5.450	-16	
								3.000	5.450	-16	
S4.000	7.200	1.500	Junction		4.000	5.700	-16				
S4.001	7.200	1.520	Junction		4.001	5.680	-16	4.000	5.680	-16	
S4.002	7.200	1.553	Junction		4.002	5.647	-16	4.001	5.647	-16	
S4.003	7.200	1.600	Junction		4.003	5.600	-16	4.002	5.600	-16	
S4.004	7.200	1.727	Junction		4.004	5.473	-16	4.003	5.473	-16	
S4.005	7.200	1.740	Junction		4.005	5.460	450	4.004	5.460	-16	
S1.012	7.200	1.764	Junction	0	1.012	5.441	1050	1.011	5.440	1050	
								4.005	5.436	450	
	7.200	1.760	Open Manhole	0		OUTFALL		1.012	5.440	1050	

Free Flowing Outfall Details for Storm

Outfall Pipe Number	Outfall Name	C. Level (m)	I. Level (m)	Min I. Level (m)	D, L (mm)	W (mm)
1.012		7.200	5.440	0.000	0	0

Cole Easdon Consultants		Page 4
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon IDB Drain 360 min + 40%	
Date 15/12/2017 13:45 File 5897 - Network IDB Drai...	Designed by njackson Checked by DF	
XP Solutions	Network 2015.1	


Offline Controls for Storm

Weir Manhole: S1.011, DS/PN: 1.011, Loop to PN: 3.000

Discharge Coef 0.544 Width (m) 6.000 Invert Level (m) 5.450

Weir Manhole: S4.003, DS/PN: 4.003, Loop to PN: 2.000

Discharge Coef 0.544 Width (m) 6.000 Invert Level (m) 5.600

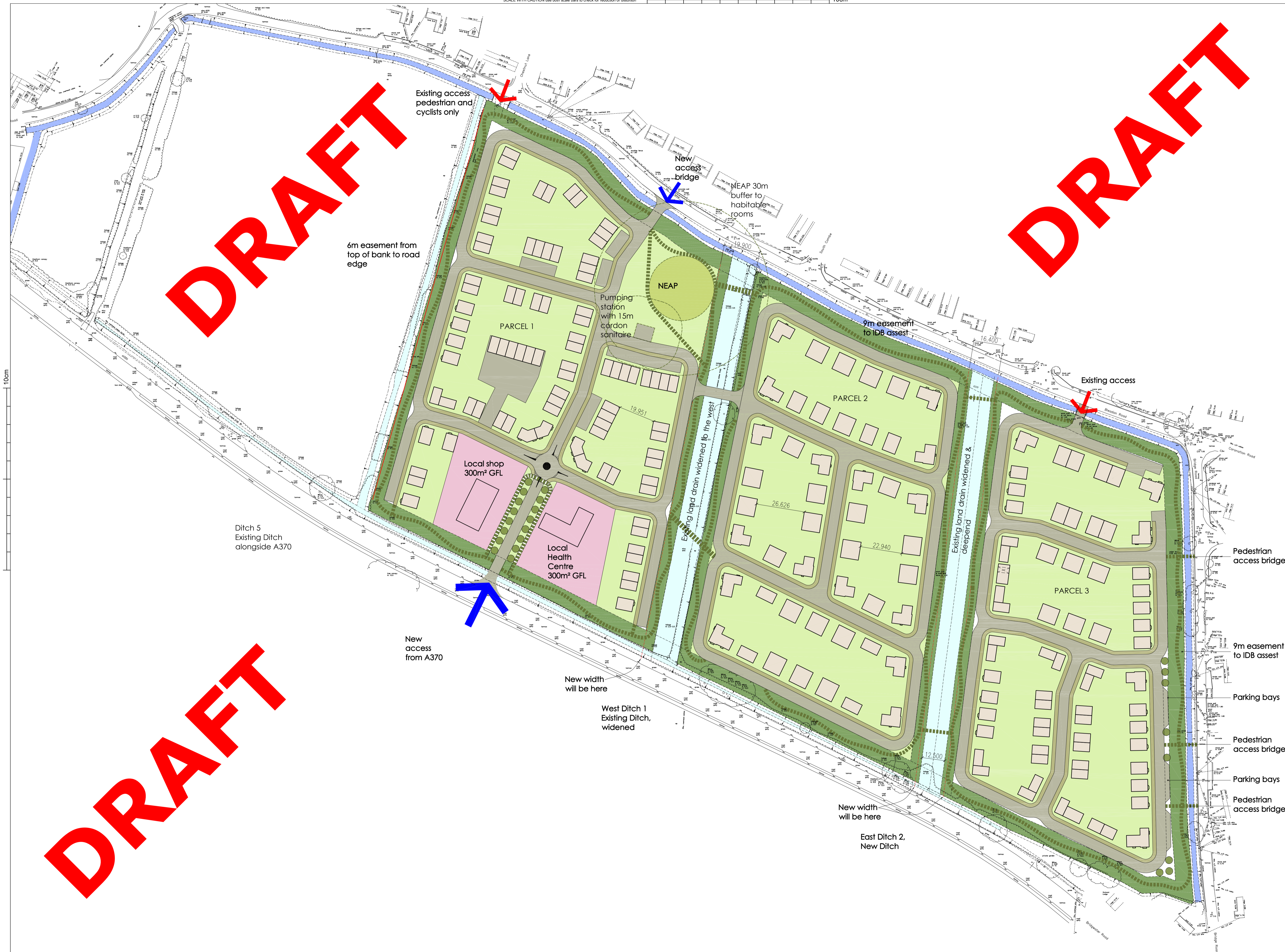
Cole Easdon Consultants		Page 5
160 Aztec Aztec West Bristol BS32 4TU	5897 - Bleadon IDB Drain 360 min + 40%	
Date 15/12/2017 13:45 File 5897 - Network IDB Drai...	Designed by njackson Checked by DF	
XP Solutions	Network 2015.1	

Summary of Results for 360 minute 100 year Winter (Storm)

Margin for Flood Risk Warning (mm) 300.0 DVD Status OFF
 Analysis Timestep Fine Inertia Status OFF
 DTS Status ON

PN	US/MH Name	Water		Surcharged		Flooded		Pipe Flow (l/s)	Status
		Level (m)	Depth (m)	Volume (m ³)	Flow / Cap.	Overflow (l/s)			
1.000	S1.000	6.222	-1.128	0.000	0.02			282.2	OK
1.001	S1.001	6.221	-1.129	0.000	0.02			282.9	OK
1.002	S1.002	6.220	-1.130	0.000	0.02			280.4	OK
1.003	S1.003	6.219	-1.131	0.000	0.02			280.3	OK
1.004	S1.004	6.218	-1.132	0.000	0.02			279.9	OK
1.005	S1.005	6.216	-1.134	0.000	0.02			276.6	OK
1.006	S1.006	6.214	-1.136	0.000	0.03			570.1	OK
1.007	S1.007	6.211	-1.139	0.000	0.04			636.1	OK
2.000	S2.000	6.207	-1.293	0.000	0.00			5.4	OK
1.008	S1.008	6.207	-1.143	0.000	0.07			943.6	OK
1.009	S1.009	6.204	-1.146	0.000	0.06			948.7	OK
1.010	S1.010	6.201	-1.149	0.000	0.06			971.7	OK
3.000	S3.000	6.189	-1.161	0.000	0.00			13.1	OK
1.011	S1.011	6.188	-0.312	0.000	0.94	11.7	965.2		OK*
4.000	S4.000	6.103	-1.497	0.000	0.00			13.1	OK
4.001	S4.001	6.103	-1.477	0.000	0.00			35.3	OK
4.002	S4.002	6.102	-1.445	0.000	0.00			63.7	OK
4.003	S4.003	6.101	-1.399	0.000	0.01	5.6	93.6		OK
4.004	S4.004	6.100	-1.273	0.000	0.01			103.9	OK
4.005	S4.005	6.094	0.184	0.000	0.81			109.8	SURCHARGED*
1.012	S1.012	6.083	-0.408	0.000	0.69			966.4	OK*

Appendix 4



DRAFT

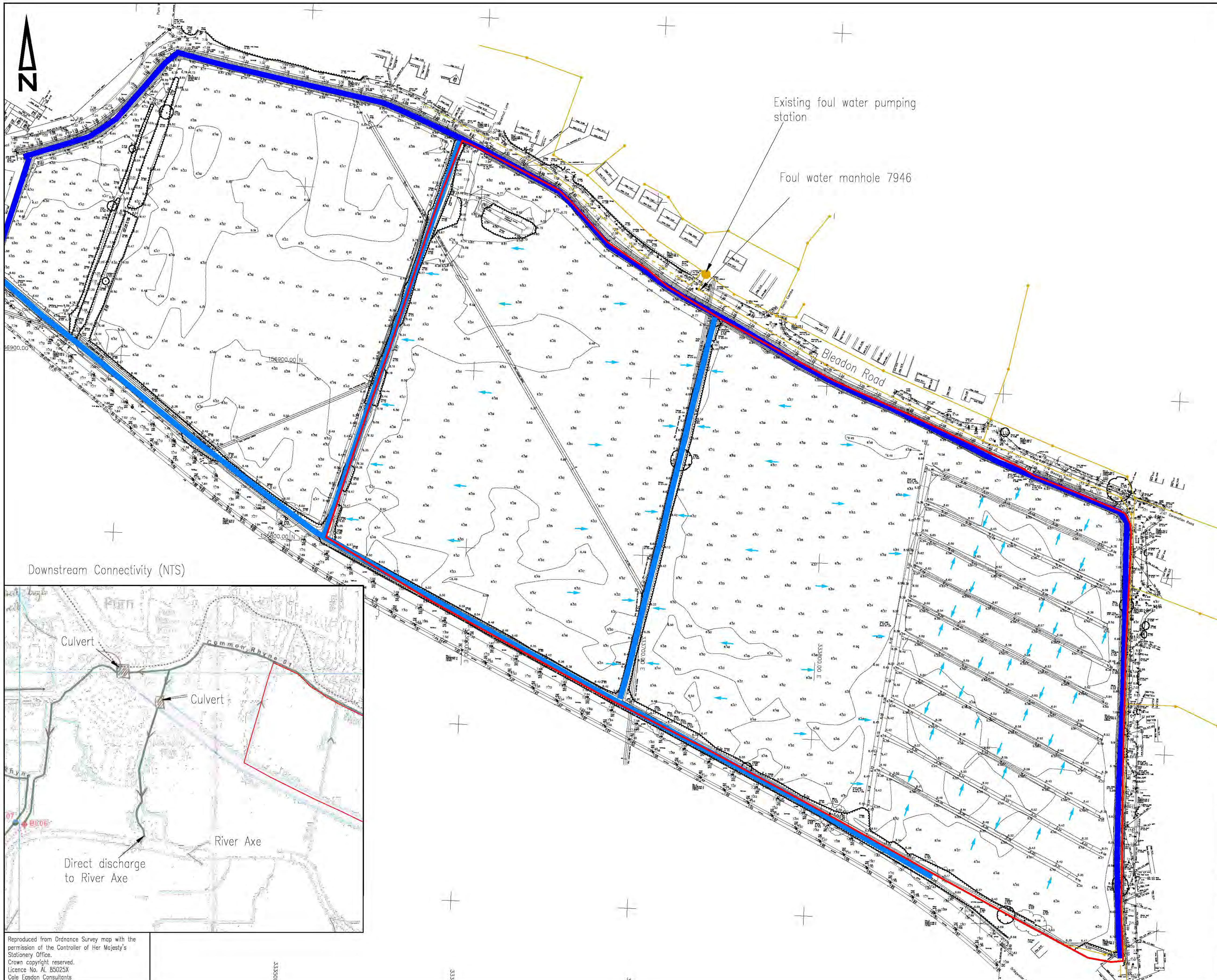
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- KEY**
- Site Boundary
 - 9m IDB buffer
 - Net developable areas
 - Local Centre
 - Existing Access
 - Potential new Access
 - Existing IDB asset
 - New / Enhanced drain
 - Tree / shrub planting
 - Bridges
 - Proposed internal footpaths
 - NEAP Neighbourhood Equipped Area of Play

Location	Scale	Date	Drg no.	Rev	Status	Title
Land off Bleadon Road, Bleadon	1:1000@A1	Nov 2017	LMP001	-	Planning	Illustrative Masterplan

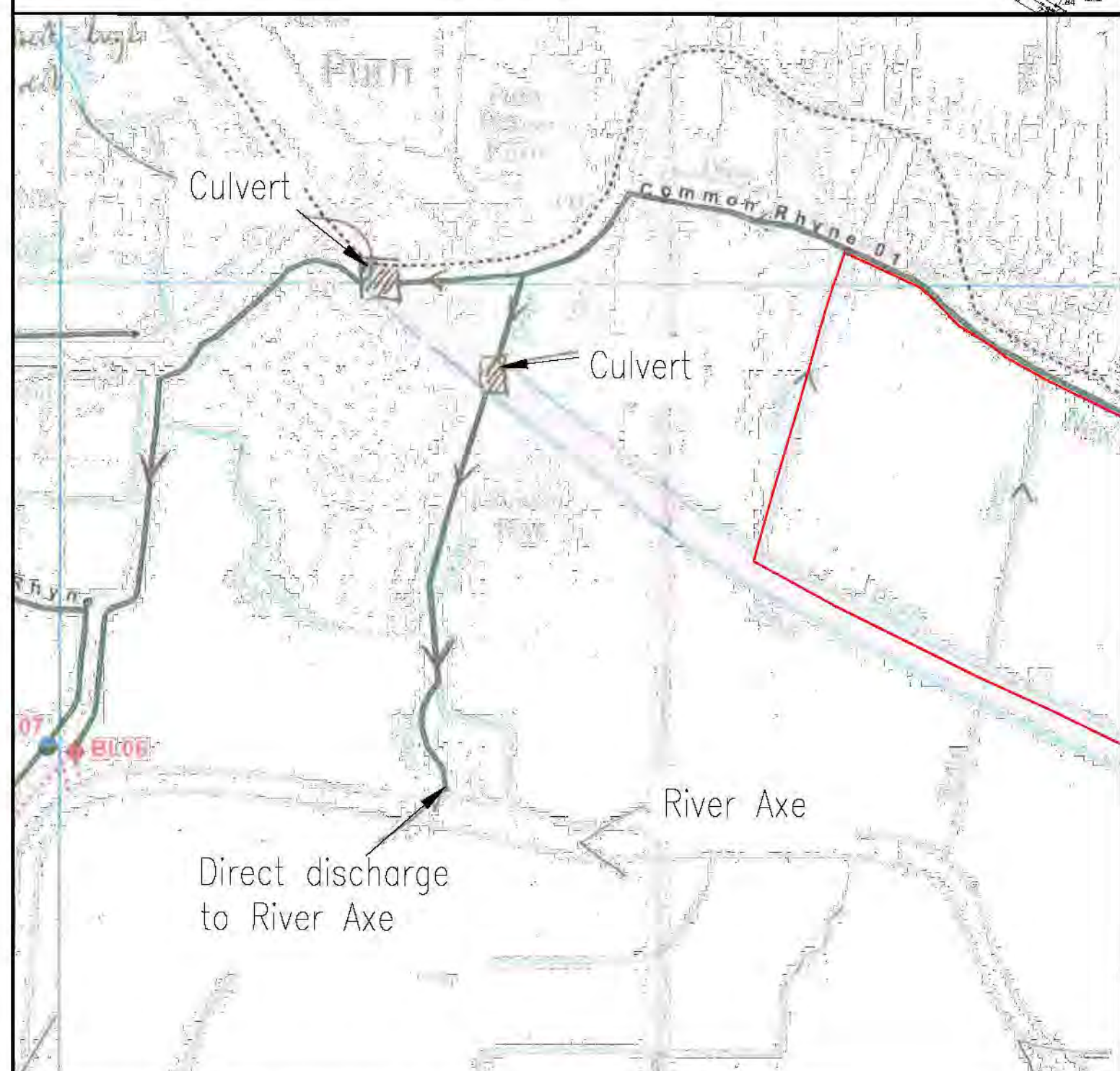
Appendix 5



- Key**
- Site Boundary (106743m²)
 - Existing Foul Water Sewer
 - Existing Foul Water Rising Main
 - Existing drainage rhynes maintained by IDB
 - Existing drainage rhynes
 - Overland flow route

- Notes:**
1. All levels are in metres above ordnance datum.
 2. All dimensions are in millimetres unless stated otherwise.
 3. Sewer records provided by Wessex Water

Downstream Connectivity (NTS)



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COLE EASDON CONSULTANTS

160 AZTEC
 AZTEC WEST
 ALMONDSBURY
 BRISTOL
 BS32 4TU
 Tel : 01454 80474

Web Site www.ColeEasdon.com
 E-mail br@ColeEasdon.com

Client
Mr C Sanders

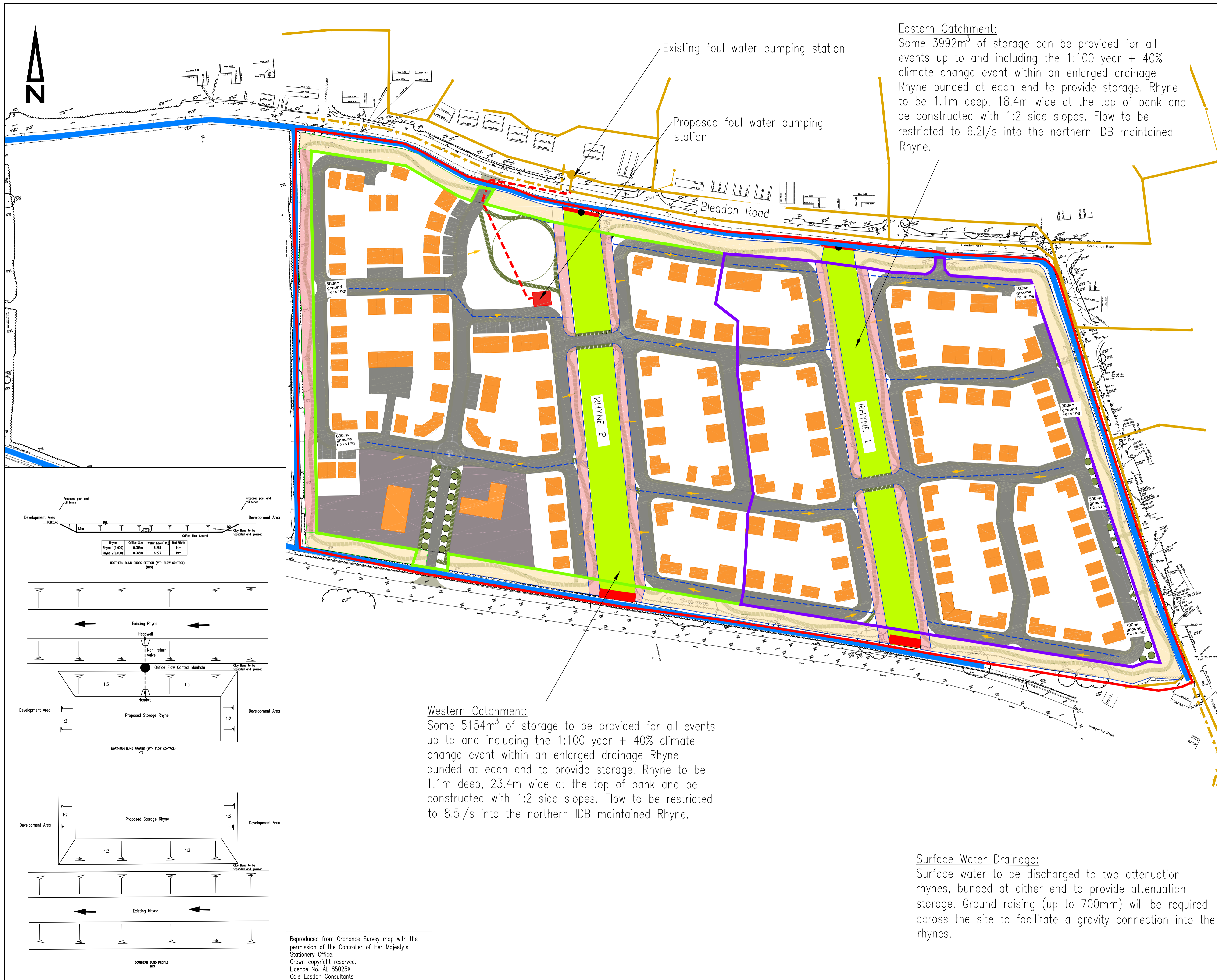
Job Title
**Proposed Development
 Land at Bleadon Road
 Bleadon
 Weston-Super-Mare**

Drawing Title
Existing Site Layout

Drawing Status:				
FOR COMMENT	FOR PLANNING	FOR TENDER	FOR APPROVAL	FOR CONSTRUCTION
X				
CONSTRUCTION AT CLIENT / CONTRACTOR RISK				
Designed by:	Drawn by:	Checked by:		
NJ	NJ	DF		
Date:	Scale:			
February 2018	1:250 @ A1			

Dwg No.
5897/501

Rev.



Eastern Catchment:
 Some 3992m³ of storage can be provided for all events up to and including the 1:100 year + 40% climate change event within an enlarged drainage Rhyne bunded at each end to provide storage. Rhyne to be 1.1m deep, 18.4m wide at the top of bank and be constructed with 1:2 side slopes. Flow to be restricted to 6.2l/s into the northern IDB maintained Rhyne.

Western Catchment:
 Some 5154m³ of storage to be provided for all events up to and including the 1:100 year + 40% climate change event within an enlarged drainage Rhyne bunded at each end to provide storage. Rhyne to be 1.1m deep, 23.4m wide at the top of bank and be constructed with 1:2 side slopes. Flow to be restricted to 8.5l/s into the northern IDB maintained Rhyne.

Surface Water Drainage:
 Surface water to be discharged to two attenuation rhyne, bunded at either end to provide attenuation storage. Ground raising (up to 700mm) will be required across the site to facilitate a gravity connection into the rhyne.

Key

- Site Boundary
- Existing Rhyne
- Existing public foul water sewer
- Proposed foul water rising main
- Proposed impermeable area (26822m²)
- Proposed roof area (12836m²)
- Eastern Catchment
- Western Catchment
- Proposed drainage rhyne
- Proposed 9m easement from IDB maintained rhyne
- Proposed 6m easement from onsite rhyne
- Proposed bund with flow control. Refer to northern bund detail
- Proposed bund. Refer to southern bund detail
- Proposed foul water pumping station
- - - Proposed foul water rising main
- - - Proposed surface water pipes
- 700mm Ground raising required
- Design exceedance flow route

Notes:

- All levels are in metres above ordnance datum.
- All dimensions are in millimetres unless stated otherwise.
- Sewer records provided by Wessex Water

Rev. A	Designed Drawn NJ NJ	Checked Date	DF	13.6.18	Notes updated and details added
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 AZTEC WEST
 ALMONSBURY
 BRISTOL
 BS32 4TU
 Tel : 01454 800474

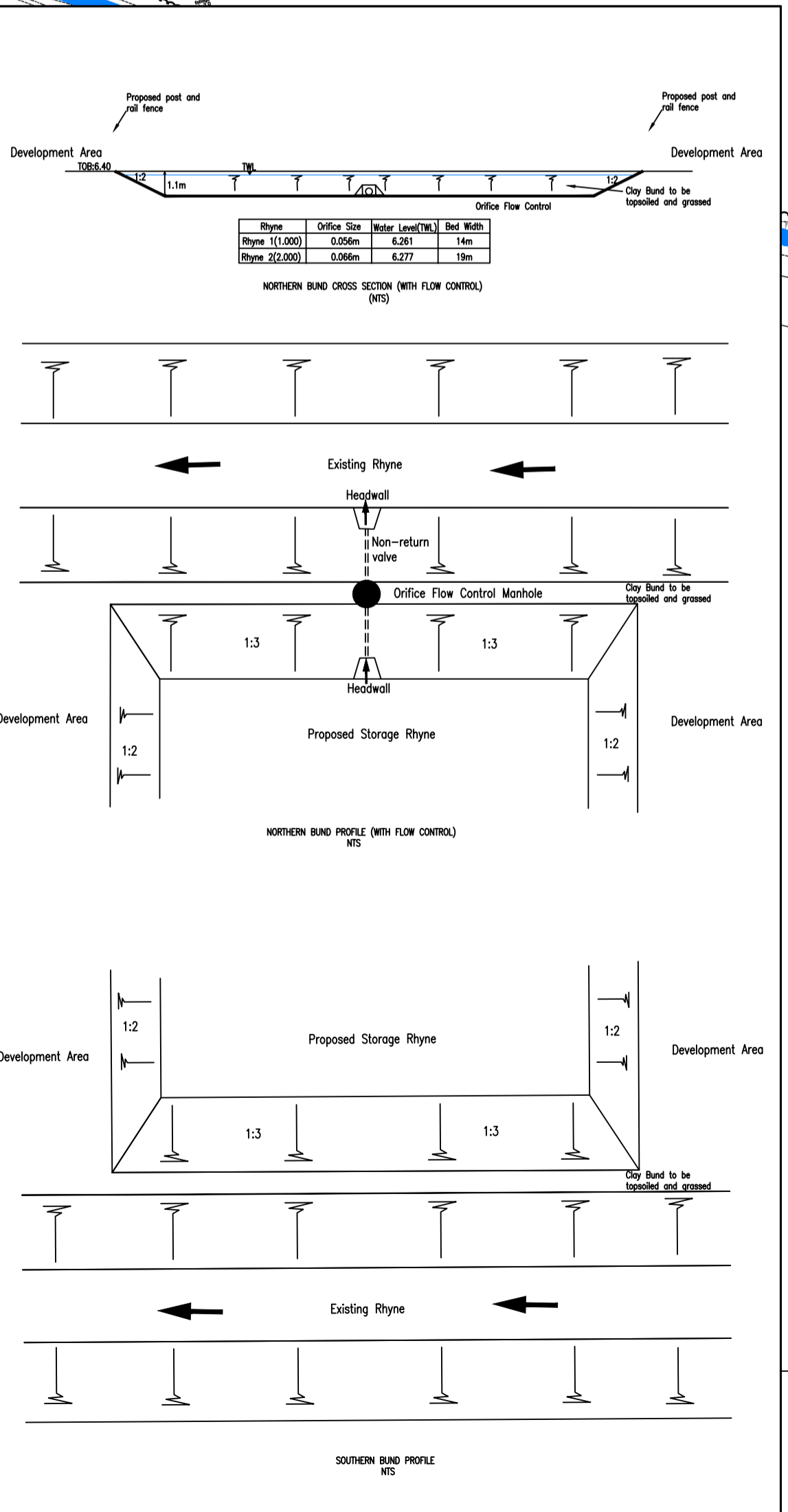
Web Site www.ColeEasdon.com
 E-mail br@ColeEasdon.com

Client: **Mr C Sanders**

Job Title: **Proposed Development Land at Bleadon Road Bleadon Weston-Super-Mare**

Drawing Title: **Proposed Site Layout**

Drawing Status:					
FOR COMMENT	FOR PLANNING	FOR TENDER	FOR APPROVAL	FOR CONSTRUCTION	AS BUILT
CONSTRUCTION AT CLIENT / CONTRACTOR RISK					
Designed by: NJ	Drawn by: NJ	Checked by: DF			
Date: February 2018	Scale: 1:250 @ A1				
Dwg No: 5897/502				Rev. A	



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Appendix 6

Sequential Test

Introduction

The following Sequential Test has been commissioned to support planning application 17/P/5545/OU for:

“Outline planning permission for the erection of up to 200 dwellings, a Health Centre, a Doctors Surgery, retail outlets and office/employment space with all matters reserved for subsequent approval.”

In correspondence with the Planning Officer it was advised that the Planning Policy Guidance (PPG) requires a Sequential Test to be undertaken if a development falls within flood zone 2 or 3. The geographical search area should be confirmed in discussions with the local planning authority (LPA). In this instance the LPA have not requested a search area but it has been assumed appropriate to include all site available outside of Flood Zone 2 and 3 in North Somerset

Planning Policy Considerations

As stated in the National Planning policy Framework (NPPF); paragraph 101:

“The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test”

It is within this framework that the following Sequential Test has been undertaken.

The constrained nature of the Local Planning Authority's (LPA's) boundary must be considered. Below is a map taken from North Somerset's planning policy interactive map, it shows the following constraints:

- Green Belt
- Flood Zone 3
- Flood Zone 2
- SFRA Main River
- SFRA tidal flood zone 3a
- SFRA tidal zone 3B
- SFRA fluvial flood zone 3A
- SFRA fluvial flood zone 3B
- FRA tidal and fluvial flood zone 2

Due to strict policy requirements to build in the Green Belt, all Green Belt Land has been discounted for new residential units.

As the sequential test looks to steer development to sites in Flood Zone 1, all sites in flood Zone 2 and 4 have been discounted.

The remaining areas need to be assessed against North Somerset Planning Policy for the building of new residential homes.

There are a host of policy considerations which may have an effect on the building of new dwelling houses. Those of design or detail have been discounted with policies that concern the actual principle of building at the location included.

Core Strategy (January 2017)

- CS3: Environmental impacts and flood risk assessment
- CS6: Norths Somerset's Green Belt
- CS13: Scale of new housing
- CS14: Distribution of new housing
- CS19: Strategic gaps
- CS33: Smaller Settlements and countryside

Site and Polcies Plan Par 1 (July 2016)

- DM10: Landscape
- DM12: Development within the Green Belt
- DM45: The conversion or re-use of rural buildings to residential use

Sites and Polices Plan, Part 2 (April 2018)

- SA1: Housing allocations
- SA2: Settlement boundaries
- SA6: Strategic gaps
- Schedule 1: Housing allocations

As a further consideration it is noted that the PPG states:

“When applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken. For example, in considering planning applications for extensions to existing business premises it might be impractical to suggest that there are more suitable alternative locations for that development elsewhere.”

Paragraph: 033 Reference ID: 7-033-2014030

This pragmatic approach should be applied to sequential tests undertaken within the LPA boundary.

Evidence Base

In setting out a Sequential Test a suitable and robust evidence base must be used. The starting point for this evidence base is the LPA's Strategic Housing Land Availability Assessment (SHLAA) and the LPA's 5 Year Housing Land Supply (5yhls), in this instance the most recent iteration of each document are the below:

- ❖ SHLAA -November 2013
- ❖ 5YHLS – Residential Land Survey April 2017

These documents recently been tested at two separate Appeals, these where:

- Farley Fields in Backwell was recovered by the Secretary of State who issued his decision in March 2018. It concluded that the LPA had only a 3.9-year supply.
- Laney Drove in Weston Super Mare where the inspector concluded the LPA have 4.4 years supply based on more up to date figures available (decision issued June 2018).

At both of these appeals it was confirmed that the LPA does not have sufficient housing land to demonstrate a 5 year housing land supply.

The relevant Inspectors comments on land supply from Laney Drove are copied in below:

41. The Council and appellant have helpfully isolated the specific sites where there is disagreement as to whether they should be included in the five-year supply of deliverable housing sites. Footnote 11 to the Framework expands on what is meant to be deliverable as does the national Planning Practice Guidance. The so-called St Modwen Developments Limited judgements, confirmed that Paragraph 47 of the Framework requires that Councils have an obligation to provide a sufficient supply of land which is capable of being delivered to provide a five year housing supply. There is a clear distinction between what is capable of being delivered, and what will be delivered. Thus, for a site to be regarded as deliverable, it need not be necessarily certain or probable that housing will be delivered upon it, or that it would be delivered to the fullest extent possible within the five years. Rather, it should simply be capable of being delivered. As a consequence, there needs to be clear evidence to show not that there is simply doubt or improbability, but rather that there is no realistic prospect a site could come forward within the five year period for it to be discounted from the supply.

52. These sites are allocated for development, and therefore, must be by definition developable. However, the adopted SAP requires that a sequential and exceptions test be undertaken for some of the allocated sites. Consequently, for the reasons set out above, I am unable to conclude that ten of the sites are necessarily capable of delivery within the next five years. This reduces the supply by 705 dwellings.

58. There are clear benefits to the scheme, namely, a mixed development, including up to 115 homes, of which 30% would be affordable (to be secured by planning obligation). Representatives of the local construction industry, who spoke in favour of the scheme, were clear that it was achievable within the next five years and I am aware of the pressure for development in the area⁹. Given the lack of a five-year supply of deliverable housing sites in the area, I accord this benefit substantial weight.

As the LPA used there most up to date evidence base at appeal 3184845 it is clear that the LPA can not show a sufficient supply of houses, including those in Flood Zone 1, 2 or 3.

The LPA have not produced or provided evidence to show any other land which is available for housing outside of Flood Zone 2 or 3.

In light of the land supply the LPA have provided to two Inspectors and the Secretary of State it is clear they do not have sufficient land in Flood Zone 1 to accommodate their housing need.

Summary

The evidence base for housing has been assessed by 2 Inspectors and the Secretary of State, in all cases the supply of housing has been found insufficient.

As there is no other land available to build on it considered the site passes the sequential test and will provide a vital addition to North Somerset's housing figures.

Statement of Case
APP/D0121/W/18/3211789
Land off Bleadon Road, North Somerset

Appendix XIV

Fw: Decision Notice for Application No 17/P/5545/OUT

Amanda Sutherland

Mon 22/10/2018 10:41

To: Chris Burton <chris@sutherlandpls.com>;

 1 attachments (83 KB)

17.5545.OUT LAnd off Bleadon Road, Bleadon 2.doc;

sanders discussion

Amanda Sutherland LLb(Hons) PG Dip LPC

Sutherland Property & Legal Services Ltd
1st Floor
1 Stamford Fort Cottages
Stamford Road
Plymouth
PL9 9SQ

Tel: 01752 403983 or 07949 047543

Email: admin@sutherlandpls.com

[http:// www.sutherlandpls.com/home](http://www.sutherlandpls.com/home)

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From: Roger Willmot <Roger.Willmot@n-somerset.gov.uk>
Sent: 18 September 2018 17:32
To: Amanda Sutherland; David Tate
Cc: Jessica Roberts
Subject: RE: Decision Notice for Application No 17/P/5545/OUT

Dear Amanda

Thank you for contacting me again in connection with the above. I have again reviewed the decision with the case officer, David Tate.

I believe that David had made clear that there were a number of objections, which will have been signalled to you early on in processing so these are not new matters raised. David also indicated that refusal reason 1, based on the conflict with settlement policy was one which it was unlikely you would be able to address. He had agreed, in the cooperative approach expected, to allow additional time as you had requested an opportunity to try to address the other issues he had identified with the proposal at an early stage. He gave no assurance that additional information or changes would address the initial concerns.

I note that you considered that you had anticipated the inclusion of a policy objection and the ecological matters would probably form refusal reasons.

I can confirm that our transport officer had thoroughly examined the additional information from Carl Tonks and still found it had not addressed many of his concerns. The further comments, dated 10th September will shortly be uploaded to our website. However, for ease, I have attached a copy for your attention.

You reference the sequential testing, however, I disagree with your assertion that this is unclear in the report. As I mentioned I did not go into detail in our phone conversation and there was no attempt to go into detail in those on either part. There is guidance on our website which you may find helpful.

<http://94.175.229.157/KBA/DM/Documents/Flood%20risk%20advice%20notes.pdf>

I note your comments about the refusal reason 2 but feel that you may have misread the reasoning behind this. We explicitly recognise that this is an indicative layout and accordingly the report makes it clear that any reservations concerning this could be addressed at a reserved matters stage. I refer you to Issue 2 which explains our reasoning.

Notwithstanding the above, these issues can be the subject of further discussion and may be capable of resolution before any appeal is dealt with.

I hope that this is helpful.

Kind regards

Roger Willmot
Service Manager Strategic Developments
Development & Environment
North Somerset Council

Tel: 01275 888811
E-Mail: Roger.Willmot@n-somerset.gov.uk
Post: Town Hall, Walliscote Grove Road, Weston-super-Mare, BS23 1UJ
Web: www.n-somerset.gov.uk

From: Amanda Sutherland <amanda@sutherlandpls.com>
Sent: Tuesday, September 18, 2018 12:02 PM
To: Roger Willmot <Roger.Willmot@n-somerset.gov.uk>; David Tate <David.Tate@n-somerset.gov.uk>
Cc: Jessica Roberts <admin@sutherlandpls.com>
Subject: Re: Decision Notice for Application No 17/P /5545/OUT

Thank you - I look forward to discussing with you in due course.

kind regards

Amanda Sutherland LLb(Hons) PG Dip LPC

Sutherland Property & Legal Services Ltd
1st Floor
1 Stamford Fort Cottages
Stamford Road

Plymouth
PL9 9SQ

Tel: 01752 403983 or 07949 047543
Email: admin@sutherlandpls.com
http:// www.sutherlandpls.com/home

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From: Roger Willmot <Roger.Willmot@n-somerset.gov.uk>
Sent: 18 September 2018 12:00
To: Amanda Sutherland; David Tate
Cc: Jessica Roberts
Subject: RE: Decision Notice for Application No 17/P /5545/OUT

Dear Amanda

I am meeting David later today to discuss the matters you have raised today and yesterday. We will come back to you as soon this afternoon after that, but I do need to understand his response to your comments first, which we will do when we are both free later.

I hope this helps.

Regards

Roger Willmot
Service Manager Strategic Developments
Development & Environment
North Somerset Council

Tel: 01275 888811
E-Mail: Roger.Willmot@n-somerset.gov.uk
Post: Town Hall, Walliscote Grove Road, Weston-super-Mare, BS23 1UJ
Web: www.n-somerset.gov.uk

From: Amanda Sutherland <amanda@sutherlandpls.com>
Sent: Tuesday, September 18, 2018 11:47 AM
To: Roger Willmot <Roger.Willmot@n-somerset.gov.uk>; David Tate <David.Tate@n-somerset.gov.uk>
Cc: Jessica Roberts <admin@sutherlandpls.com>
Subject: Fw: Decision Notice for Application No 17/P /5545/OUT

Dear Roger

As per my email yesterday.

Are you going to withdraw and reissue the DN?

I need to know today please as PINS have contacted me about the inquiry and whether we need to submit a revised statement of case due to the additional matters now raised by the LPA.

kind regards

Amanda Sutherland LLb(Hons) PG Dip LPC

Sutherland Property & Legal Services Ltd
1st Floor
1 Stamford Fort Cottages
Stamford Road

Plymouth
PL9 9SQ

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Email: admin@sutherlandpls.com
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From: carl@tonks-consulting.co.uk <carl@tonks-consulting.co.uk>
Sent: 17 September 2018 15:59
To: Amanda Sutherland
Subject: RE: Decision Notice for Application No 17/P /5545/OUT

Hi Amanda,

I have gone through the report in full now and other than removing their previous comments in regard to policy changes which had come about since our original TA was written, I see very little if any change from the previous highways consultation response. They have most certainly not considered the additional information we submitted, a further copy of which I attach hereto. In short, the criticism of the scheme on highways grounds comprises;

1. No visibility splays shown on access drawing – See Figure 3.1.
2. No assessment of junction interaction – See Chapter Four.
3. No junction design for northern access – See Chapter Five and Figure 5.1.
4. No traffic calming – See Figure 5.1.
5. No junction design for other northern access - See Chapter 6 and Figure 6.1.
6. Safety concerns of right turning traffic – See Chapter 7.

7. Trip rates not robust – See Chapter 8.
8. Office trips – See Chapter 9.
9. Census calculation for trip distribution – See Chapter 10 and Appendix E.
10. Impact no adjacent junctions on A370 – See Para 11.1.
11. Parking – See Chapter 12.
12. Site Layout – This is a Outline Application.
13. Walking and cycling – See Chapter 15.
14. Public Transport – See Chapter 16.
15. Accessibility – See Chapter 17 and Figure 17.1.
16. Travel Plan – See Chapter 18.

The LHA has made no attempt to engage in regard to any of the above matters. These were raised and we addressed them all in the attached Tech Note. We have received no contact to suggest that our additional work was in any way unsatisfactory.

I am of course happy to discuss the above, but it is clear in my mind that the LHA has given no consideration to the information submitted in our Tech Note 2. Had any issues or criticisms been raised in regard to any of the above points then **cTc** would have directed the LHA to the relevant sections of our submission or entered into further, detailed discussions in order to satisfactorily resolve the issues.

Please do not hesitate to come back to me with any questions or issues arising in regard to the above.

Kind regards,

Carl

Carl J Tonks BSc MSc MCIHT FIHE

DIRECTOR **carl TONKS consulting**
MANAGING DIRECTOR **cTc Group**
Transport Planning, Traffic Engineering and Highway Consultancy

Breaking News!

Our Bristol Office has moved to provide space for our ongoing growth. We are within a minute's walk of Bristol City Council buildings at College Green and convenient for access on foot or by public transport. Alternatively several large car parks are located close by. Should you find yourself in or around central Bristol, please drop by to say hello and we'd be delighted to show you our new home.



13 – 14 Orchard Street
Bristol
BS1 5EH

T- 01179 055 155
M- 07866 543939



cTc also has offices in
Newport.

e- [carl@tonks-
consulting.co.uk](mailto:carl@tonks-consulting.co.uk)
w- [www.tonks-
consulting.co.uk](http://www.tonks-consulting.co.uk)

cTc is a strategic alliance between **carl TONKS consulting** and **cTc Transport Planning**.

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Sutherland Property & Legal Services

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