
Responses to Remitted Policy Consultation

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

1013153//1

Backwell Parish Council

Backwell Parish Council

Backwell Parish Council met last night and discussed the above-mentioned consultation. They passed the following resolution:

Resolved: Unanimously Backwell Parish Council supports North

Somerset Core Strategy: Examination of remitted policies

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

1014881//1

Long Ashton Parish Council

Long Ashton Parish Council

Long Ashton Parish Council feels that a dwelling requirement of 17,130 is over generous as it dilutes the employment led approach initially followed and the infrastructure is not present to support the extra people. It believes that existing areas of green belt should be rigorously maintained and supports the policy of not building in the green belt.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

1019201//1

Please see attached response.

Wrington Parish Council

Wrington Parish Council

 [WPC response to Policy CS13 consultation jan2014.pdf](#) (163 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

1045217//1

Sian Parry

Avon Wildlife Trust

The Trust is concerned about the potential impact of an additional 3130 (or 22.4%) dwellings on the natural environment and biodiversity of the area, although the document states that these can be delivered in accordance with the existing policies. The greatest increase in dwellings appears to impact on Weston urban area including the Weston Villages, with a focus on the re-use of previously developed land (CS14: Distribution of New Housing, p35). The Trust would wish to see the background evidence that the area can sustain this amount of new housing and have a minimal impact on green infrastructure and ecological networks, by the Council revisiting its Sustainability Appraisal.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

1045697//1

Please see attached comments below.

Del Piero Ltd

Del Piero Ltd

 [Del Piero Ltd \(CSJ Planning\) response.doc](#) (164 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

1089633//1

Wessex Water

Wessex Water

We note the revised levels of housing and the reviews planned for 2016 and 2021. The target numbers now identified at 17,130 from previously stated levels at 14,000.

We agree with Para 25 & 26 to approach housing requirements to accommodate the SHMA reporting in 2015.

There is a need for balanced and sustainable growth related to the industry capacity for house-building and supporting infrastructure.

We look forward to any future consultations for site allocations.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

2557121//1

Kenn Parish Council

Kenn Parish Council

Thank you for advising Kenn Parish Council of the consultation on North Somerset Core Strategy Examination of Remitted Policies. The Parish Council considered at their recent meeting the documents provided on the North Somerset Council web site as relating to Kenn.

The comments of Kenn Parish Council are as follows and are in relation to the North Somerset Strategic Housing Land Availability Assessment 2013:-

(1) Kenn Parish Council supports the following identified site being included:

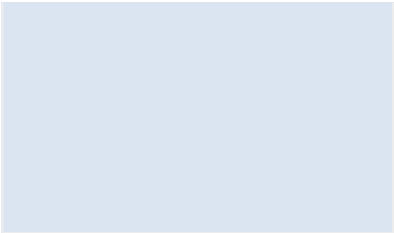
Schedule 1: Identified Potential

SH1205 Stowell Concrete Site, Kenn (Infill Village) 14 dwellings

(2) Kenn Parish Council has no comments on the following:

Schedule 2B: Discounted sites - incompatible with the spatial strategy

SH12117 Kenn Rd, Kenn, 5 dwellings, main reason for removing - Flood zone 3b



North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

3322113//1

Yatton Parish Council

Yatton Parish Council

The Parish Council considered the increase in numbers acceptable but did not wish to see any further housing allocation within Yatton, the increase should be accommodated within the four main towns. Yatton has already well in excess of a hundred houses allocated on sites that have had applications either approved, previously refused or are included within the SHLAA and are all within the settlement boundary. As a service village these sites already take account of the "infill development" this designation allows. There is no scope within existing school provision (the schools are full), medical facilities (the building cannot be extended further) or in terms of infrastructure to cope with an influx of new residents. The exit from a motorway (M5) straight onto a B road (the B133 to Yatton) is unusual and when problem occurs on the M5 Yatton becomes completely gridlocked.

The Parish Council very much support strategic gaps between villages, they preserve the individual identity and character of the villages and Councillors are keen to see them retained not only between Congresbury and Yatton (as identified in the SPD PD) but also Yatton and Kenn/Kingston Seymour.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

3361153//1

Persimmon Homes Severn Valley

-

Please see attached comments.



[Persimmon Homes \(Severn Valley\) Ltd \(Turley Assoc\) response 1.docx](#) (933 KB)



[Persimmon Homes \(Severn Valley\) Ltd \(2\).docx](#) (61 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

3399393//1

Bloor Homes

-

Please see attached response.

 [Bloor Homes \(Barton Willmore\) response.pdf](#) (99 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

3619969//1

University of Bristol (Alder King)

Alder King

Please see comments attached.



[University of Bristol \(Alder King\) response.pdf](#) (6.5 MB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

4193569//1

**PORTISHEAD TOWN
COUNCIL**

Portishead Town Council

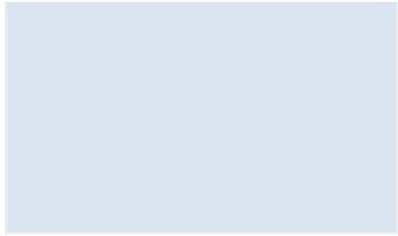
Following a meeting of the Portishead Planning & Regulatory Committee on 2nd January 2014, please find to follow the recommendation going to full Town Council on Wednesday 15th January 2014 in respect to the above;-

The meeting discussed the Consultation. It was felt that an objection should be made to any increase in housing in Portishead or the surrounding area.

RECOMMENDATION:-

“Portishead Town Council objects to any further increase in Portishead and the immediate area. The increase Portishead has had in the last few years has put severe strain on the infrastructure; places in primary schools and roads. Community organisations are feeling the strain and we feel a period of stability is required in order for the community to recover and flourish. It is the Town Council’s belief that the density accepted in the Town is higher than is now considered acceptable, which has caused considerable transport problems.”

We will advise of any amendments made by full Council.



North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

4207073//1

Matthew Macan

Please attached comments below.



[Matthew Macan response.pdf](#) (230 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

4208641//1

Please see attached comments.

Hoddell Associates

Hoddell Associates

 [NSC CS Reps Jan14.docx](#) (20 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

4602593//1

Gleeson Strategic Land

Gleeson Strategic Land

North Somerset Core Strategy: Examination of remitted policies

Gleeson Development Ltd

These representations relate to the Council's attempt to address the issues raised in the High Court and decision to remit policies to the Planning Inspectorate for re-examination. Particular interest is in policy CS13 relating to housing numbers for the District.

The Council have produced a 'Statement for Consultation.' The Council claim that the remitted policy has been amended from the original Core Strategy 'in light of up to date information'. However the remitted policy is fundamentally flawed.

The planning landscape has changed significantly since the original Core Strategy was submitted for examination. It is no longer acceptable for policies to be prepared in isolation of neighbouring authorities with an inward looking approach.

The original Core Strategy was submitted for examination on 8 July 2011. Section 33A of the Planning and Compulsory Purchase Act 2004 came into force on 15 November 2011. As such the Council were able to have their document considered without having to comply with the Duty to Cooperate. This is no longer the case.

The Government has replaced strategic planning with a ‘duty to co-operate’ with adjacent local planning authorities. The remitted policy has to be considered to be compliant with the strategic role of planning. Failure to do so will undermine the whole Core Strategy as this pivotal policy would have no regard for the strategic role of North Somerset in the wider West of England SHMA. The revised policy already accepts that it would not be delivering the entirety of the housing need for the District in isolation. However there is no discussion of where the unmet need would be met.

The existing SHMA is dated 2009 (already out dated) and the Council acknowledge that a review of the SHMA for the West of England is being undertaken. The Council accept at para 24 of their consultation document that if higher housing numbers are required in North Somerset as a result of the revised SHMA then a review of the plan may be required. This approach is short sighted and fails to embrace the principles required for strategic planning providing a framework for the delivery of much needed development in the area.

The need for co-operate between planning authorities is not new and para 157 of the NPPF makes clear that ‘Local Plans should: be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations’. The remitted

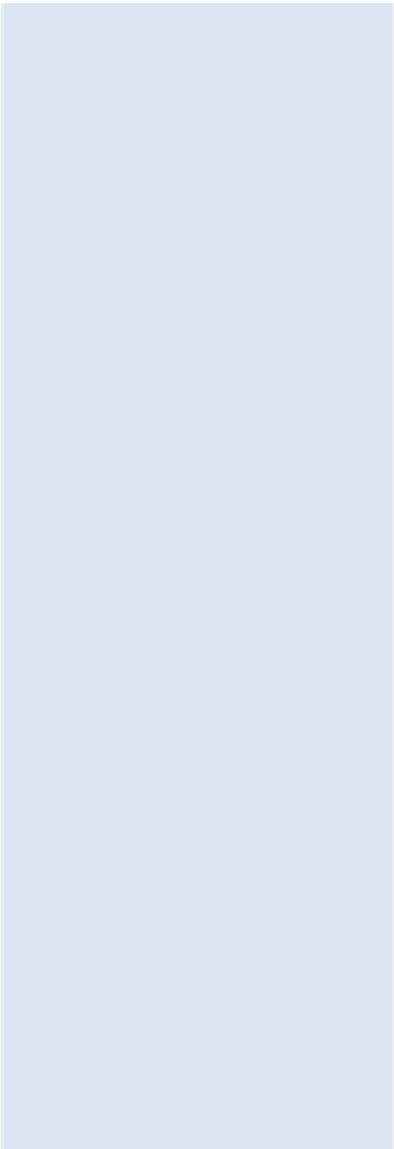
policy should embrace these principles and demonstrate how the revised housing figure has been informed by collaborative working with a wide range of bodies. The Council's approach appears to be to develop a revised housing number on the minimum objectively assessed housing need to seek self-containment. This approach is idealistic and ignorant of the reality of the interaction with the wider Housing Market Area.

The failure to consider the relationship with the wider strategic needs of the area is a flawed starting point for this remitted policy. The proper degree of co-operation has not taken place. The policy has been developed with an early review in mind which is not acceptable and is considered unsound.

Para 47 of the NPPF requires Councils to 'boost significantly the supply of housing' by, amongst other things, using the evidence base to ensure that the full, objectively assessed needs for market and affordable housing in the housing market area is met.

Para 159 of the NPPF requires Councils to have a clear understanding of housing needs in their area. It advises Councils to prepare a SHMA to assess the full housing needs, working with neighbouring Councils where housing market areas cross administrative borders. In this case the HMA includes six authorities. The most 'up to date' SHMA dated 2009 identified 17,130 to 20,220 dwellings as being the objectively assessed needs for the area. So to summarise on the approach for the remitted policy it is based on the minimum figure identified as an objectively assessed need in an out of date SHMA. This cannot be a sound basis for developing a strategic housing policy for the District and does not accord with the principles of the NPPF to boost housing supply.

The Core Strategy does not properly addresses housing issues in the wider area and where it is identified that North Somerset is part of a much wider housing market area which is not limited to the local authority boundary.



The full, objectively assessed needs for market and affordable housing (including any backlog) has not been identified and the review of the SHMA is awaited it cannot be shown that these needs are being met.

The Council's approach, does not allow for the degree of flexibility that is necessary to meet changed circumstances. The Council themselves discuss the need for a review should housing numbers in the emerging SHMA be increased. This is not an acceptable foundation for a 'new' housing policy.

The remitted policy has not been prepared in line with NPPF guidance. The Council should assess the need for housing and should plan to meet those needs; the Core Strategy does not comply with the guidance.

The document has also not been prepared in the light of the strategic context, a document which is inward-looking and does not appear to be based on addressing the potential housing issues of a wider area, including Bristol. These matters go to the heart of the Core Strategy and are unlikely to be capable of being addressed by making Main Modifications.

It is clear that this process is being undertaken under sufferance by the Council. Para 86 of the consultation document still expresses the view that the Council do not accept the High Court Judge's findings. This illustrates the driving mentality behind this revised policy. The work and effort put into creating, analysing, justifying and developing a policy which is NPPF compliant and sound in terms of a strategic policy has not been done.

What the document does is continue to rationalise an approach which is dated and no longer compliant with the strategic needs for the wider area and the dated objectively assessed housing needs for the district.

It is an approach which has been developed for an early review which in itself is unacceptable. At the very least the objectively assessed needs of the 2009 SHMA (20,220) should be catered for at this stage with distribution to sustainable settlements, such as Nailsea, to enable sustainable delivery of much needed housing.

Reps on housing number for North Somerset Plan

The housing number of 17,130 proposed in policy CS13 is not supported by sufficient evidence. The evidence which has been provided has not been prepared in accordance with the NPPF, the draft National Planning Practice Guidance (NPPG), or

the legal test of the Duty to Cooperate. A significantly higher housing target should be proposed for North Somerset in order to meet needs.

Paragraph 159 of the NPPF indicates that local planning authorities should have a clear understanding of housing needs in their area, and in order to do so they should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. Paragraph 47 of the NPPF requires local planning authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. The report by Edge Analytics covers only North Somerset itself, it does not extend to the wider housing market area which includes other neighbouring authorities. North Somerset Council has therefore failed to assess objectively assessed housing needs for the housing market area within which it sits.

In the section on assessment of housing and economic development needs, the NPPG states that “Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.” North Somerset Council does not appear to have worked with other authorities in its housing market area in assessing its housing needs. Although work is currently underway for a joint West of England Strategic Housing Market Assessment, which is apparently being prepared in co-operation with neighbouring authorities, this work is yet to be completed, and has not informed the Council’s choice of housing target.


Given that the Council has not worked with other authorities within its housing market area in determining its housing target, not only has it failed to meet the requirements of the NPPF, it has also failed to meet the requirements of the duty to cooperate.

Hart District Council’s Core Strategy represents an example of a similar situation, which resulted in the plan failing. At Hart the housing evidence had not assessed housing needs for the whole housing market area, which led to the Inspector stating the following is his letter of 26th July 2013 as part of his explanation of why the plan had failed: “There is no agreement between relevant authorities as to the level of overall housing need within the HMA, how it could be accommodated and how any unmet need from one authority could be met elsewhere.” Another example of an authority failing to assess housing needs of the housing market area is Waverley Borough Council. The Inspector’s letter of 13th June 2013 highlights the situation, which eventually led to the plan being withdrawn.

Notwithstanding the fact that cooperation with other authorities in the housing market area has not taken place, the selected option of “current trend growth” for the

housing target is not considered to represent objectively assessed need. The “current trend growth” option, as the name suggests, follows *current* trends, which does not take into account under-supply and lack of affordability of housing during previous years. The NPPG indicates that estimates may require adjustment to reflect factors which are not captured in trend data, for example formation rates which may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing.

We would like to participate in any future examination hearings into this matter.

-  [Hart Inspector's Letter.pdf](#) (3.2 MB)
-  [Jan 2014 Submitted reps.pdf](#) (255 KB)
-  [Waverley Inspector's Letter.pdf](#) (170 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

6235201//1

See attachment below.

South West HARP Planning Consortium

 [South West HARP \(Tetlow King\) response.pdf](#) (72 KB)

South West HARP Planning Consortium

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

706241//1

Nailsea Town Council

Nailsea Town Council

All the detailed comments made by Nailsea Town Council to previous relevant consultations remain pertinent, especially its response to the Sites and Policies Plan consultation of February-April 2013. In particular, the Town Council's support for the investigation of any site for development is conditional on a review of the Green Belt around Nailsea. Also, the objective of having a balanced and sustainable population must be supported by an appropriate mix of housing.

The Town Council requests that it is represented at the forthcoming Inspector's Examination in Public.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

8109089//1

Mr R G Fox

Policy CS13. Scale of New Housing.

I take it that the rejection of the previous overall 14000 figure has come about basically due to the present lack of supply of new dwellings and to match the future estimated requirements until 2026. It seems that every City, District or Unitary Council in the land is being asked to increase their housing supply to match the nations predicted population increase.

The 14000 figure still has its logic because of the limited distribution of suitable land, in the safe developable sense. Land is either developed already or land is subject to flooding or too hilly and difficult to bring employment sites alongside residential development.

If I may speak for my own area in the north of North Somerset, this is particularly true of the Gordano Valley area. I therefore support the revised position NSC has put forward, in that there are definitely no opportunities for further housing development and nothing of potential can be identified in this area.

CS14. Distribution of New Housing.

There has already been substantial housing development around Portishead and Portbury Wharf that has been to the maximum. These developments depend on a single transport access, the A369, but has also brought the disadvantage of creating a huge residential cul-de-sac off J19 M5.

The valley itself has become more prone to fluvial saturation due to more regular periods of precipitation as recently experienced once again. Also any prospective development site would need a much greater rhyme and ditch maintenance program together with reactive weir height adjustments to assist excess water transport to the sea, when peaks occur. Additionally, the promotion of wetlands, by the wetlands lobby, has reduced the capacity for water storage. There is an urgent need to get back to proper drainage provision to safeguard the existing developments there are.

It is impracticable to consider the land hereabouts as suitable for distribution of new housing.

CS6. Green Belt.

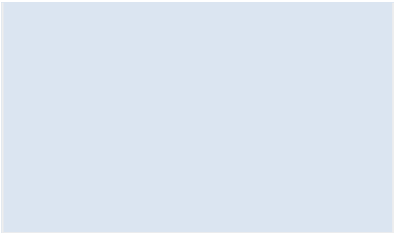
I have not been able to establish a map of the Green Belt boundary for the Gordano Valley after interrogating the North Somerset Council web site.

I assume there is no reason to change its boundary in this area and therefore will remain the same as current. I would expect that the EA flood contours are always within, and otherwise similar to, the GB boundary.

Please note also that the sewage works at Portbury Wharf is at its full capacity, and would need major upgrade if more development distribution were to be sought.

General.

My first choice would be to stay at the 14000 figure for the whole of North Somerset. I detect a compulsion from on high to increase this number. NSC revised figures on population growth are commensurate with the revised low end figure of 17130, and only up to this number can I support. The mid and high numbers must be rejected, as must the house builders numbers which are completely untenable.



North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

8123073//1

**Bristol City Council
(Fletcher)**

I can confirm that Bristol City Council raise no objections to North Somerset's proposed position statement.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

8126849//1

Sport England (G Parsons)

Sport England

Sport England has no comment to make on the above consultation.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent



Comment

8128353//1

The Nurse Trust

The Nurse Trust

Please see attached comments and supported plan.

 [North Somerset submission January 2014.pdf](#) (210 KB)
 [Nurse_Trust_Portishead_2 \(1\).pdf](#) (545 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

8132929//1

Thatchers Cider Co Ltd

Please see attached comments prepared by Hoddell Associates

 [NSCS T Jan14.docx](#) (19 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

8132993//1

Messrs Vowles

Please see attached comments prepared by Hoddell Associates

 [NSCS V Jan14.docx](#) (19 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

8142177//1

**Mactaggart and Mickel (PCL
Planning)**

Please see attached comments.

 [Mactaggart](#) (250 KB)

 [Mactaggart](#) (246 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

8882145//1

WILLIS

I have been a resident of north Somerset since 1966 and for 25 years was a planning officer in the local planning authority followed by 8 years as a district councillor. So I have seen at first hand the inexorable growth of development and population and other local towns. This is encapsulated in the figures below -

Population	1951	1991	2011
North Somerset	91282	177472	202566
Weston-super-Mare	40396	64935	80076

Forty years ago this growth was justified by a high birth rate. This fell considerably, yet by the 1980's -- when I was involved in monitoring land availability and population trends in Woodspring DC, further growth was being justified mainly on the basis of falling household size (down to 2.3). Now I find that with household size not having fallen much further, your main reason for proposing even more development is the needs of inward migration. So it seems that it does not matter what justification is used so as long as the demands of the housebuilders are met ! (I know they want even more). Extrapolation of past trends show that this is an unsustainable policy, because if it were to continue North Somerset would have as many people as Bristol.

I know that North Somerset is an attractive place to live in. The demand from people wishing to move into the area to work, as commuters or on retirement seems inexhaustible.

The report by Edge Analytics (fig 10) shows that over the period 2001 - 2011, 60% of net inward migration into the district was from Bristol (i.e. 1306 out of 2130 per year). This does not surprise me. It reflects not only the appeal of the district to commuters, but also the fact that house prices in Weston are cheaper than in Bristol. In recent years the demand for houses in Bristol has led to a big increase in prices, a trend which runs counter to that in most cities. I recently carried out an analysis which

shows that whilst many of the village house prices are still much higher than those in Bristol, Weston-super-Mare and Worle are much cheaper than average i.e.

Churchill, Wrington and Winscombe	£336, £325, & £280
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BRISTOL	£212
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Weston-super-mare	£166
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The appeal of Weston to people on lower incomes is self evident.

Unfortunately, this inevitably results in commuting the 20 miles or so to Bristol, putting pressure on the capacity of the A370 and the M5 and necessitating the current expensive improvements at junction 21. How much better it would be if any new housing for Bristol commuters could be accommodated nearer to Bristol rather than in the so-called "Weston villages".

The Edge Analytics report concedes that if new development was restricted to local needs, only 242 houses per year would be needed. All their other scenarios envisage a continuing substantial amount of inward migration, which would lead to the consequences described above.

To summarise my case is that there has already been more than enough development in North Somerset, and that to continue with the proposed policy is unsustainable and that the demand for more housing should be met elsewhere. Otherwise it could be a case of killing the goose that lays the golden egg (i.e. North Somerset's attractiveness).

Charles Willis B.A., MRTPI

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

8883873//1

j speight

It appears to me that throughout the paper and in the EDGE calculation no account has been taken of the fact that in the 1970s there was a massive influx of young families into the area particularly Nailsea as a result of new housing.

This led to the mismatch between jobs and homes as stated in para 84. However, many of the incomers from the 1970s are now elderly and their housing is becoming available to families with working parents. Therefore rather than perpetuate the trend it is highly likely that this trend will be reversed and that N Somerset will tend to match the rest of the West of England over time.

This is particularly true of Nailsea and further erosion of the green areas surrounding the town would be unnecessary and undesirable.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9044545//1

JBClancy

I have reviewed all the relevant documents with regard to the change to the core strategy from 14,000 to 17,000 new houses within North Somerset and have the following comments/questions resulting from those documents.

Whilst I recognise that as a country we need more housing, and in particular, more affordable housing we also need to ensure that individuals and families living in those house have the means to be able to live in them and that means the jobs to support such households. The initial numbers were firmly based on economic grounds within N Somerset with some account taken of the wider requirements of the West Country. However, we need to find more jobs/businesses in the area to prevent people from migrating out of the area to work, adding to the already overstretched infrastructure, to enable them to live and work in N Somerset. What is being done to encourage and support new businesses to the area?

As mentioned above, the infrastructure supporting households is already overstretched, this includes roads, railways, hospitals, schools, doctors surgeries, public transport. Can we please have assurance that when permission to develop land these are taken into account. In certain areas primary schools are already full, this will mean secondary schools of the future will be oversubscribed forcing more migration to schools outside area. It is already difficult to get doctors appointments in some areas and this too needs to be considered when approving development. Part of that approval should include schools and medical facilities.

Due to the fact that we live in a rural location, and a large volume of people who work outside of the area, most families have more than one car. Our roads are already overfull and additional homes can only make this worse.

In addition, whilst I recognise that previous governments have advised on car parking facilities for homes, given the location of the area, public transport and the will of individuals to own and use private vehicles, planning recognises this need and accommodates not only parking for owners vehicles but recognises that we do actually have visitors and they need somewhere to part too.

Looking at the maps, the flood plains have been taken into account however, given the recently severe weather we have encountered, it needs to be recognised that building anywhere means removing the run off areas that take water into the natural

water courses and creates hard standing where there was once soft ground to drain the water away. If environmentalists and climatologists are right, this is not going to improve and should be taken into account when building.

There has already been a number of developments approved for building and completed since 2006 (extensive building in Portishead is an example of this). I am assuming this is taken off the 17,000 which means that there will only be approximately 8,000 new houses to be approved before 2026. The plans for these developments need to be closely monitored, I am well aware that developers have a habit of changing their plans once approved, usually to their benefit not to that of the residents.

The use of empty dwellings and brownfield sites should also be considered in the development of a housing strategy. Ensuring that all empty dwellings are refurbished and then used as housing should be a priority, it not only provides good housing but also uses existing infrastructure and improves existing communities.

I am not against the development of new housing, but all the factors above need to be considered when approving development and monitoring that development.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9072129//1

**Backwell Residents
Association**

**Backwell Residents
Association**

Backwell Residents Association ("BRA") is an independent group representing a significant number of parishioners in the village of Backwell. Backwell is one of the "Service Villages" which could potentially be affected by the increase in housing numbers proposed by the revisions suggested by the Council in November.

BRA objects to the revised proposal , and considers that the original number of 14000 units should be retained.

The Core Strategy adopted in April 2012 provided, in Para CS13, for a total of 14000 residential units to be provided throughout the Plan period up to 2026.

BRA considers that the original Core Strategy did make sufficient provision for actual and latent demand for residential units, and the original figure of 14000 units adequately matched anticipated demand with supply in the Unitary Area. The Core Strategy is designed to meet local needs and should not be influenced by wider demands for neighbouring authorities or National government inclinations.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9086945//1

Fisher German

Thank you for your letter to GPSS, Government Pipelines and Storage Systems, dated 29.11.13 regarding the above. Please find attached a plan of our clients apparatus. We would ask that you contact us if any works are in the vicinity of the GPSS pipeline or alternatively got to www.linearsearbeforeudig.co.uk our free online enquiry service.

 [Pipeline map.pdf](#) (2.5 MB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9088833//1

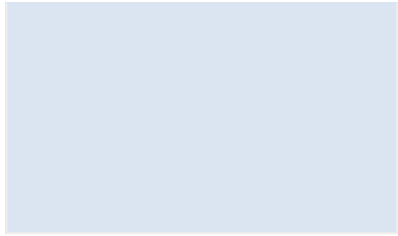
Ms C Hamilton

My reply to your letter regarding NS Core Strategy on Planning Policy is that I disagree with the proposed change to Policy CS13 and prefer the number of houses to be built remain at 14,000.

Because, in my opinion, the building contractors are given too much power, the following should be in place before any licence to build is granted.

1. No new build on flood plains or near rivers.
2. A concentrated effort be made to renovate old and empty properties.
3. Convert empty office buildings that have been empty for years.
4. A restriction on the number of houses built in one given area.
5. An infrastructure such as surgeries, schools, job opportunities, transport, shops, green spaces, car parks and play areas should be planned and where possible in place before house building begins. These plans should be agreed to, printed and signed by the contractor who, together with central government be responsible for the cost.
6. Forbid the use of courts by contractors to settle a dispute with the local authority. This practice leaves the local authority at a disadvantage as the contractor has sufficient funds and the local authority none.

More power should be placed in the hands of the local authority since their knowledge of the area and the needs of their residents is greater.



North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9108225//1

Mr A Armstrong

I am writing to express my concern that in your decision at your meeting of 12 November 2013 in response to the report by Edge Analytics you are in danger of over-estimating the required number of houses in your Core Strategy. I am a retired economist/statistician familiar with economist models and government statistics. I felt the Edge report was a detailed and well-prepared document. However, there are parts I am less happy with and I am concerned about the conclusions and actions you have drawn from it.

The option which you adopted is one of the lower projections recommended by Edge Analytics but it still requires you to build about 3000 more dwellings than in your previous Core Strategy document. Having studied the Edge report my feeling is that **you have little need to increase the numbers in your original plan.**

I would argue this under 3 points: - commuting, labour force participation and migration.

(1) Commuting. Edge point out that a reduction in out-commuting would reduce the need for new dwellings below that in their projections (paras 5.23 & 6.20). Edge have assumed a constant commuting ratio of 1.22 (para.6.44). This is a reasonable starting-point (but only as a starting-point). This may not be an easy variable to forecast. However, they point out in para.5.24 that jobs growth would lead to greater self-containment. In table 7 they show the dwelling requirements associated with various lower commuting ratios. The reduction in the number of dwellings with even a very modest drop in the commuting ratio from 1.22 to 1.15 is quite striking – 340 fewer dwellings.

As to what is likely to happen to commuting one only has to consider the ever-increasing transport costs (both public and private transport) and the increasing congestion and journey times to realise that commuting out from North Somerset to, especially, Bristol will become even less attractive. Edge state in para.5.42 that “*these outcomes provide useful benchmarks derived from a particular set of model assumptions*” and that “*improvements in labour force retention.....would reduce the estimated housing requirement*”. I feel that you are making a mistake in accepting Edge’s assumption of a constant commuting ratio and you should seriously **consider adopting housing requirements based on a lower out-commuting scenario.**

(2) Labour Force Participation / Economic Activity Rates . Edge point out that the increase in the number of over-65's in the area will, on current trends, reduce the percentage of people of working age from 61% to 55% and to counter this inward migration (and dwellings) will be needed. However, if more people remain economically active in their later years this will provide some of the required labour force to service the North Somerset economy. Their dwellings already exist and hence the demand for new dwellings will be reduced.

In their projections Edge assume some increase in activity rates among older age groups (para.6.41) resulting from a reaction to changes to the state pension ages. These increases are, in fact, not as great as would appear from a quick look at the data in para. 6.41. Here it shows a “40% increase in the activity rate for women aged 60-64”. This does not mean an increase of 40 on 30 to 70% but an increase of 40% of 30 to 42%. (and similarly for other groups). In the current economic climate these increases seem unduly modest. There is more to this than the effect of the increasing pension age. We have already had five years of very low economic growth with many people seeing real incomes falling. This will have reduced their ability to save for retirement; indeed with low interest rates some people will have been drawing early on their “pension pot”. Many occupational pension schemes will not be paying out as much as people had planned on. Low interest rates are likely to be with us for a few years. Further, Edge do not quote any increase in activity rates for the under 60's which I would suggest is very likely. The days of ‘cosy’ early retirements before the age of 60 have gone.

In para.5.42 Edge remark that “*a more substantial change in the rates of economic participation in the older age-groups..... would reduce ...the estimated housing requirement.*” In the light of the factors mentioned in the previous paragraph I would suggest that you should **consider revising these dwellings forecast downwards.**

(3) Migration. Population growth in the area can be split into two components – natural growth (births and deaths) and migration (internal from withinUK and international). It is clear from the table below that inNorth Somerset in the past decade migration has been the dominant factor.

<u>annual average</u>	<u>2001-05</u>	<u>2006-10</u>
<i>Internal migration</i>	2300	1900
<i>International migration</i>	340	240

<i>Unknown</i>	<u>-800</u>	<u>-940</u>
<i>Total migration</i>	1840	1200
<i>Natural growth</i>	<u>-220</u>	<u>+140</u>
<i>Total population growth</i>	<u>1620</u>	<u>1340</u>

(Note-these figures have been obtained by reading from the graphs

In figures 6,7&8 of the Edge report)

There are, however, serious problems associated with these figures, especially international migration. Edge point out that there is “*considerable uncertainty*” over the data for international migration (paras. 3.18 & 3.24). Their solution is to combine the “unknown element” with previously recorded “international”(rows 2+3 above) to give the negative figures (i.e. net outflow) in figure 8. Further analysis could show that this implies an unbelievable outflow of international migrants (see footnote) but they had little alternative to doing this. In my experience of working with government statistics and with the government statisticians who compile the figures I know that errors, inconsistencies and inaccuracies can easily occur and that often the only way to make progress in research is to make such bold assumptions.

One would like to be working with more accurate figures on which to base forecasts but, in the present context, it perhaps makes relatively little difference to the housing requirements whether the inward migrants are from UK or overseas. In the chosen scenario, Mig-led_5yrs (tables 5 & 6, pp 24 & 27), the projection is for net inward migration of 1171 p.a.

This gives rise to 2 comments. Here I should point out that although I am familiar with models used by economists I am not so familiar with demographic models and I may be making elementary errors in what follows. But I will press on.

Firstly, if Mig-led_5yrs is a trend projection based on the same data as in the table above it seems (a) rather high i.e not much below the past five years and (b) to ignore the downward trend from 2006 to 2010.

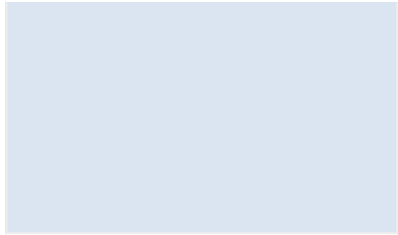
Secondly, there seems to be a “chicken-and-egg” situation here. Taking past migration as the basis for future migration in these “migration-led” scenarios seems to ignore the fact that much of the past migration has been the result of major developments of

reasonably priced housing in Locking, Worle and Portishead attracting people from Bristol and other areas. It is this extra housing and available jobs (and out-commuting) which caused the inward migration. Surely, without the past housing developments there would have been much less inward migration. It seems a little strange, therefore, to project forward this level of migration and from that to derive the future need for housing. It was the extra housing in the past which caused the migration in the first place and not *vice versa*. Which is “cause” and which is “effect”?? I would suggest that the level of migration is determined by the housing (and jobs) available and **migration is not a given factor which can be used to determine housing needs**.

I would be interested to have this clarified and similarly if you need me clarify any of my points please let me know.

<u>Footnote</u>	<u>International Migration</u>	
<u>annual average</u>	<u>2001-05</u>	<u>2006-10</u>
(a) International migration net		
including “unknown”	-460	-700 (table 8, p.10)
(b) Recorded inward		
international migration	540	800 (fig.11, p.14)
(c) Implied outward		
= (a) minus (b)	1000	1540

As noted above something had to be done to reconcile the figures in the light of the “unknown” element which arose in the analysis of population growth and Edge made the choice of adding it International migration. When data on recorded inward migration is included this suggests a very large outflow of people from N.Somerset to other countries.



North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9110209//1

**CPRE North Somerset
District Group**

**CPRE North Somerset
District Group**

Please see attached CPRE North Somerset group response



[CPRE N Somerset Response to CS31 consultation.doc](#) (82 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9116129//1

Nash Partnership

Nash Partnership

Please find representation document prepared by Nash Partnership attached.



[13079_U01_04_Representation to North Somerset Council Core Strategy Remitted Policies_170113.pdf](#) (82 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9138081//1

**Summerfield Developments
(SW) Ltd (WYG A Bullock)**

WYG

Please see attached response.



[Summerfield Developments \(WYG\) response.pdf](#) (653 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9138561//1

**Hallam Land Management
(Savills)**

Please see attached comments.



[Hallam Land Management \(Savills\) response.pdf](#) (149 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9138657//1

**Home Builders Federation
Ltd (S Green)**

**Home Builders Federation
Ltd**

Please see attached comments below.

 [Home Builders Federation response.pdf](#) (226 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent





Comment

9140289//1

Please see attached documents submitted obo Del Piero Ltd

Del Piero Ltd

Del Piero Ltd

-  [Appendix DP5 - South West Housing Crisis Report - June 2012.pdf](#) (384 KB)
-  [Appendix DP4 - Solutions for the housing shortage - FINAL \(1\).pdf](#) (792 KB)
-  [Appendix DP3 - Home Truths 2013-14.pdf](#) (812 KB)
-  [14.01.17 - ETP.1026 - Del Piero Ltd - Representations to Remitted Core Strategy Policies.pdf](#) (7.2 MB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9140385//1

Please see attached document below.

Moor Farm Trust

**Mactaggart & Mickel Homes
Ltd**

 [Moor Farm Trust \(Mactaggart\)](#) (2.3 MB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9140513//1

**Barton Willmore, Alvis
Brothers & Trustes of AE &
RS Hill Settlement**

Barton Willmore

Please see attached comments.



[Barton Willmore, Alvis brothers](#) (2.6 MB)



[Barton Willmore, Alvis brothers](#) (8.6 MB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9140705//1

**Mrs K Berkeley, Mrs S
Gwynne-Jones & Mr N
Phippen**

Please see attached comments below.

 [berkeley, Gwynne-Jones](#) (3.0 MB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9140737//1

Gladman Developments

Gladman Developments

Please see attached for Gladman's comments.



[North Somerset Remitted Policies Gladman Rep.docx](#) (69 KB)



[Appendix 1 Development Economics North Somerset report.docx](#) (210 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9141569//1

**Moor Park Ltd (PCL
Planning Ltd)**

Please see attached document.

 [Moor Park Ltd \(PCL Planning\).pdf](#) (237 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9141633//1

Please see attached comments

Mead Realisations Ltd

Mead Realisations Ltd



[Appendix 1.pdf](#) (8 KB)



[Representations by Mead Realisations.pdf](#) (70 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9141697//1

**South West Transport
Network**

**South West Transport
Network**

Please see the attached pdf for our response to CS13 identifying the need to make housing strategy and delivery "sustainable".

David Redgewell and Martin Cinnamond
South West Transport Network
Tel 07814 794953

 [North Somerset Core Strategy Response.pdf](#) (44 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9143265//1

Barratt David Wilson Bristol

Please see comments attached below.

 [Barratt David Wilson \(NLP\) 2 response.pdf](#) (1.3 MB)

 [Barratt David Wilson \(NLP\) 1 response.pdf](#) (155 KB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9143393//1

Taylor Wimpey (Savills)

Please see attached comments.

 [Taylor Wimpey \(Savills\) response.pdf](#) (1.9 MB)

North Somerset Council Core Strategy Remitted Policy Responses




Respondent

Comment

9143521//1

Richards Developments

Please see attached comments below.

-  [Richards Developments \(Oriigin3\) 1 response.pdf](#) (156 KB)
-  [Richards Developments \(Origin3\) map.pdf](#) (720 KB)
-  [Richards Developments \(Origin3\) SB map.pdf](#) (1.5 MB)

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

9144609//1

**Kingston Seymour Parish
Council**

**Kingston Seymour Parish
Council**

NSC has advanced a sound argument for raising the housing numbers to a figure at the lower end of the range suggested by the analysis and forecasts done by independent consultants Edge Analytics. In the opinion of the Parish council, it has convincingly demonstrated that a higher figure would undermine key (and approved) policies that underpin the entire Core Strategy ie sustainability and self-containment. A higher figure would perpetuate the historical imbalance between housing and employment which the new plan seeks to reverse.

In addition, it is significant that the revised housing numbers projected can be accommodated from existing permissions, existing land allocations and anticipated windfalls, ie without incursion into the Green Belt or altering existing policies relating to towns, villages or the countryside.

The Parish Council is aware that a strategic review of housing supply across the West of England as a whole is in progress which might signal a need for the Core Strategy to be revised before the end of the Plan period (2026). It believes and trusts that it is unlikely that this will be allowed to delay the adoption of the Plan in the meantime.

North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

927393//1

Mr D Withers

I thank-you for your departments continuing consideration, in updating me in relation to seeking my views (on various) planning strategies. Not that any notice have been taken of them, to date.

I regret, having once more to take an opposing stance to the Councils position, as follows.

Regarding the proposed housing, if current levels of immigration continue, I do not believe the now put forward figure of 17,130 dwellings will be sufficient over the period 2006/2026, bearing in mind the previous councils collated figure, was shown to be, and accepted by the Planning Inspectorate to be insufficient by some 3,130 dwellings, an approx. 24% shortfall, within less than a year of adoption of the “Core Strategy”, some error of judgement.

I have read the “Councils” proposed position, but not “Edge Analytics” document, as most forecast are rarely correct, and all statistics can be interpreted to suit the parties concerned.

The “Councils” position, appears to apportion most of the blame for their present troubles, on the previous Inspector, and as to the failings of previous Local Plans, in regard to the location of housing (claimed to be sustainable at the time), the subsequent commuting from Weston-Super-Mare, brought the motorway to a halt at various times.

Within the “Councils” position, the above comes over as a complete surprise almost as if it was some other “Councils” fault. Despite myself and others previously pointing out the inevitable effect of their policies for over twenty years.

In relation to the present housing numbers being tied to employment, would it not in the first instance be more appropriate to apportion new employment to previous housing, and only when that short fall has been met, too consider further housing development.

Most of the proposed new employment will relate to service industries, and the construction workers needed to erect the buildings. Following the deteriorating financial position within this country, (As I pointed out in previous comments) service industries will be the first to close, it was only quantitative easing, combined with rock bottom interest rates, causing people to spend their savings, and defer making provision for their retirement, that has postponed the inevitable.

In view of the stark alternatives, I do not believe the government had any other option than the above policy, but they had the courage to make the decision.

Unfortunately only some of the causes of our demise are being addressed, and there is a time limit, before following the above policy does more harm than good, I believe a maximum of a further six years.

I am pleased to inform you, that having referred to global warming within my letters sent in previous plan consultations, and for over fifteen years to various bodies, my viewpoint that carbon emissions are not causing global warming has been acknowledged within the top rated scientific journal "Nature Geoscience".

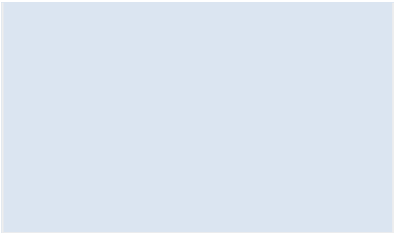
The scientists within same, cleverly worded their findings too cause the least embarrassment to carbon believing colleagues, but they found the predominant cause of warming was C.F.C's found previously in propellants and refrigerators.

Further to the above I am pleased to inform you that hydrogen powered cars, go into mass production in 2014 and only last week, the "University of Lyon" discovered a new process to create hydrogen, by using a mixture of rocks and water (with a chemical I failed to note) copious amounts of hydrogen were produced.

Strangely both "Nature Geoscience's" and the "University of Lyon's" findings were noted on the BBC's teletext "Science" page, but failed to figure on any news programme that I am aware of. Surely they both merited headline news.

I raise the above issues because of their effect on the current sustainability aspects of plans and planning decisions. In relation to the National Planning Policy Framework, my views of the Council's failure to follow same, is a matter of record, in relation to infilling and affordable housing within the "Green Belt" as is their policy of no housing development of any kind.

The above policy negates latent provision and the sustainability objectives of the N.P.P.F, by contradicting the wording therein.



North Somerset Council Core Strategy Remitted Policy Responses

Respondent

Comment

990177//1

Mark Lewis

-

I am pleased that it is proposed to retain policy CS33 which allows only replacement dwellings in Green Belt villages like Failand.

However, I do not support the proposal of 17,130 new dwellings within North Somerset 2006-2026.

The people of North Somerset should decide how many new homes are built, not national government, neighbouring authorities, or a consultation agency. The only requirement should be to build sufficient homes to accommodate natural increase resulting from births exceeding deaths within our own population. Edge Figure 8 shows that this is only about 200 per year, so would require only 100 new homes per year based on occupancy of 2. Any excess over this should be the choice of the people, who are better able than anyone else to take into account factors such as ageing population and job availability. By all means advise the people on this but do not tell them how many new homes they want, ask them. This is the only approach compliant with the principle of localism.

The authority should ask each parish how many new homes they want each year and set its annual target as the total of this. This figure is not theoretical, it is a point of fact that no judge can challenge as evidence. This is the actual "demand" ie the number of new homes the people of North Somerset actually want. Many parishes have put together a neighbourhood plan specifying what they want, eg Backwell (7.11) says 25 total over 2011-26.

Instead of the 100 new home per year we actually need, the agency consulted are suggesting 1,142 per year. This is based on some sort of theoretical analysis that has no solid basis or objective aim. It is not sustainable because there is no projection of how it will converge down on no further building over the countryside, which must be the long term objective. It suggests using all the remaining non Green Belt land such as the beautiful agricultural fields near the Causeway in Nailsea and leaving the development of real sustainable policy to the next generation, a totally irresponsible approach.

The demand for this additional housing comes overwhelmingly from the effect of net immigration into Britain, currently 182,000 per year. Immigrants move into the central areas of Bristol such as St Paul's and the original population move out to the 'unspoilt'

neighbourhoods, such as Clifton and Stoke Bishop, then when as a consequence house prices in those areas become unaffordable, to the surrounding countryside, including North Somerset, from where they commute back into Bristol, the place they actually work. The "Net Internal Immigration" shown in Edge Figure 8 is mostly from "Bristol, City of" as Edge Figure 10 shows.

The authority should publish a map of the Bristol area showing the immigrant areas such as St Paul's, displaced native populations in North Somerset and their commute paths back into Bristol. Again this is factual evidence that no judge can challenge and is required by NPPF 159: "Local planning authorities should have a clear understanding of housing needs in their area".

National government should ask each authority how many new homes they want to build and set a cap on net immigration based on the total from this. We can only control immigration if we leave the EU. An overwhelming vote for UKIP in the European Parliament election on 22 May 2014 will result in Britain leaving the EU well before the proposed referendum in 2017.

If we stop mass immigration now, we can accommodate existing housing demand in the area by development of derelict areas within Bristol. Areas of the city with such potential should be included on the proposed immigration map. Stopping development outside the city will actually drive redevelopment within it such as that ongoing in the docklands area.

As the majority of the population support leaving the EU, the authority should anticipate policy based on the principle that the people decide how many new homes are build and interpret the aims of localism and sustainability in existing legislation to imply this principle wherever there is ambiguity, notably the interpretation of "demand", what we want, should not be allowed to be confused with "imposition", what we don't want.

Report run at 21 Jan 2014 10:51:03. Total records: 50.