
North Somerset Core Strategy Sustainability Report: Revised Policy CS13 response to consultation.

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Backwell Parish Council

Backwell Parish Council supports the North Somerset Core Strategy

Backwell Parish Council

1013153//1

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Barton Willmore

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

9140513//1

Please see attached letter.



[Barton Willmore response.pdf](#) (102 KB)

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Bill

8072417//1

We would urge North Somerset Council to reject the proposal to increase the number of dwellings from 14,000 to 17,130 for two key simple reasons:

Infrastructure. There is effectively only one road into Portishead and out of Portishead - the A369. This is currently at capacity, or in excess of capacity. Whilst the J19 improvements have worked, they have moved the problem further into the town - Brewers Fayre Roundabout or Shepway roundabout now suffering delays. At rushhour access from the M5 onto the 369 can exceed a mile long wait. Unless road access can be improved potentially placing a minimum of 3,130 cars into the town is madness.

The second problem is also related to traffic - parking. Residents are struggling to park, roads are congested with parking, and now you are proposing an extra 3,000 cars.

By increasing the housing you will choke the town. The balance is just about Ok - Shopping is acceptable, facilities are good. The town can't take anymore.

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Congresbury Parish Council
Congresbury Parish Council
7688737//1

Congresbury Parish Council supports in principle North Somerset's Core Strategy: Sustainability Appraisal Supplementary Report but would like to make the following points:

1. Since the Core Strategy was first developed, Congresbury has agreed to three new housing developments:

- (i) 16 dwellings at the Bell Inn site (about to be completed)
- (ii) 4 dwellings in Wrington Road (development started)
- (iii) 28 dwellings at the Elliott Medway site (development started)

The Parish Council considers that with these 48 new dwellings, Congresbury will have taken its share of any proposed increase in the housing target for North Somerset.

2. The Parish Council believes that the increase in traffic from the above developments can be accommodated but that the infrastructure of the village is insufficient to support any additional developments, particularly in respect of the B3133.

3. The Parish Council wishes to strongly reiterate its view that building should not take place outside the current settlement boundary and would also strongly object to any developments proposed on greenbelt land.

	<p>4. The Parish Council also considers that any further developments would have adverse environment effects and, in particular, increased flood risk in a village already prone to regular flooding.</p>
--	---

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

D Withers

1001729//1

Due to the large number of pages I will not address them all just the most salient facts starting with page 13 objectives.

Most of the objectives are admirable but some appear to contradict others and will lead to a failure to meet National Governments housing targets, others are outside of the Councils ability or resources to achieve, without harming other objectives, for example.

(EN2) Minimise average travel to work distance.

To achieve same, EN1 should allow necessary commercial and industrial development adjacent to urban areas to provide for the shortfall in employment.

(E5) Minimise flood risk.

The only way to achieve same is not to build on flood plains with the additional scientifically proven damage to health, these low lying areas cause the many health risks have been known and stated by national governments own scientists for over 25 years it beggars belief, that the obvious and stated is ignored.

(EN8) Enable design to account for higher temperatures and more extreme weather.

There has been no global rise in temperature for 15 years since the ozone layers over the poles started to close following the ban on CFC gases used as a propellant and in fridges as a coolant.

There is no accepted scientific evidence to back up more extreme weather events actually the evidence prior to recent events over a very long period pointed to less events, the present storms and rainfall in 2012 and 2013 raise the issues that the rainfall in 2012 was the most for 105 years and 2013 the highest rainfall in one year for 250 years.

The above statements only prove that similar rainfall occurred long before carbon emissions rose significantly and were apportioned blame as causing a minute rise globally in air temperature.

As for climate change what defines a climate is that it varies please note global warming is no longer raised as the present reason for climate change. It follows part of the objectives of EN7, namely the installation of solar panels, is unsustainable due to the costs and high subsidy added to development and infrastructure projections.

As to solar panels sited in fields grass captures and stores the sun's energy in the most efficient and virtually no cost way, preserving much needed food growing areas.

If we were not in the EU new coal fired power stations at present coal prices without carbon capture and storage a crippling expensive farce and anti competitive climate change charges can produce electricity at 1/5 of the cost of solar (why do you think the most dynamic and successful country in Europe, Germany is building them as fast as they can).

Ironically they have had to install hundreds of billions of pounds worth of inefficient solar panels to be allowed under EU law, to offset carbon emissions.

Bearing in mind all solar panels are imported adding to our ruinous balance of payments deficit and use a valuable resource (silver) in their construction.

(EN9) Increase the life expectancy of buildings.

Is that through design or improvement grants a reduction in ever increasing energy and council tax would provide hard pressed owners the means to maintain and keep their most valuable asset their home.

(EN10) Achieve a net gain in cultural, heritage, landscape features and biodiversity.

Maintaining present standards will be hard, improving same impossible.

(EC4) Contradicts EC5, by providing phasing.

(EC6) If the council achieve these policy objectives with limited resources they would achieve the impossible.

(SC10) Meet housing requirements for all individuals and communities.

This statement is a misnomer, without building numerous council houses and changing Green Belt policy. As no number of new council houses have been proposed and affordable housing is banned within the Green Belt and in most Green Belt villages, village fences have been removed, with the intention to stop all house building.

(SC11) Narrow the gap between house prices/rents.

The only way is to reduce Council Tax, energy bills etc and build more houses than required. This will enable more people to own a home, thereby reducing increases in rent, or even reducing same. Nationwide house building, I address within section marked 6.9 from your page 15.

Page 15 Predicting Effects

As over 17,000 homes are the governments target to meet sustainable development, the majority need to be spread between towns that already provide access to jobs and towns where extra allocated commercial and industrial premises can be provided before housing development.

Most villages in North Somerset are close to major towns or cities those that are to minimise the effect of this large number of houses should be allowed to each build over the plan period up to 50 homes to disperse the blight effect on our countryside.

(6.6) The physical decline referred to especially of tourism related assets relates to the low wages and profits for most businesses obtainable outside of cities, but still having to meet national exorbitant fuel prices due to EU and government policies and similar council tax, business rates, licences etc.

Furthermore for the holiday traders two years of almost daily rain following the previous vacancies caused by the recession must be causing despair.

Why would new housing divert funds away from maintenance of existing housing stock? Surely the increased council tax and also the proposed new business rates should balance the councils coffers.

(6.9) It is government policy to increase house building nationwide, it is therefore not correct to state "In the circumstances a single local planning authority can do little unilaterally to address structural affordability issues".

In relation to greenfield verses previously developed land large areas of previously used developed land comprised open grassland a green field, despite another designation.

I assume RAF Locking and Weston Airfield by their very nature comprise more open areas and grassland than developed parts, hence the name airfield. We are only kidding ourselves by this self deception and deceiving the population nationwide.

May I put forward that a lot of logical and cogent thought has gone into producing this appraisal as can be gathered by the limited objections I have made. I am particularly pleased that it recommends no further development in the Weston-super-Mare area outside of the present urban areas (if you consider Locking and Weston airfields urban) until the balance between employment and housing has been met.

I agree with the viewpoint that continuing with large scale development after the present agreed numbers can only have a detrimental effect on the landscape and the environment in general reducing the quality of all our lives.

This combined with further large scale development nationwide detracts from the most important issue, namely the diminishing ability of the remaining farmland to feed ourselves, bearing in mind over half of our food and drink plus animal feed is presently imported when if present trends continue the inevitable bankruptcy of this nation occurs.

The large increase in our population is a political issue the only party addressing the consequences of immigration is UKIP. If the population of North Somerset wish to end further large scale development the choice is theirs.

I further note that you stated there is a shortage of expensive homes these should be predominantly sited in our villages as they are likely to be purchased by older retired people from mostly outside our area, older people tend to use their vehicles to a much lesser extent and tend to appreciate the countryside more, quiet content in their homes.

These inward migrants would help achieve government targets and benefit local communities by paying the near top rate of council tax and with money to spend in their pockets furthermore services provided by North Somerset (when required) will be met from their own resources.

I believe my previous letters and this present one address all the crucial matters and I trust they are of some use to yourselves and the Inspector.

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Bailey Building Services

Dean Scott

1026369//1

Following the issue of the attached document and the levels of housing required to be made available by North Somerset Council.

The two key areas we feel the Council should not consider for housing development are:

(A) Obvious flood areas – from this year’s weather statistics and unusually high levels of rainfall and the catastrophic effect this has on the communities who suffer both emotionally and financially;

(B) Greenbelt – this land is important for the wider environment, providing us with the trees and undeveloped land which reduces the effect of heat generated by big cities. Instead of reducing this green space, we should use it to its best effect. Over three quarters of the population would like to see more trees planted and more food produced around towns and cities. Greenbelt land is the ideal place to do this.

	<p>If houses are required above the recommended amount of 14,000 by North Somerset Council, these should be spread across service villages such as Banwell, Congresbury, Easton in Gordano, Winscombe and Yatton as set out in the Strategic Housing Land Availability Assessment 2013. Also, by spreading the additional housing needs across the aforementioned service villages would result in minimal infrastructure requirements, eg new roads / drainage changes / electricity and gas supplies.</p>
--	---

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Edwards
998977//1

It would appear indifensible to increase the amount of the Core Strategy housing requirement.

Please ensure that yourself, the officers and councillors are not browbeaten into any further increases. A suggestion, please to pass it down the line, developers to be taxed on all brownfield sites held by them which they appear not to wish to develop as it would appear they hold sufficient land to hand, say the above increase not required as they have sufficient land already.

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Gladman Developments

Gladman Developments

9334241//1

Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This letter provides Gladman's representations on the soundness of the Sustainability Appraisal (SA) for the Revised Policy CS13.

Gladman provided representations upon the soundness of the Council's remitted policies submission document in January this year. This representation noted that the lack of a published supporting SA represented a fundamental failing, leaving the plan open to legal challenge. Though Gladman are now satisfied that the Council has now met its legal obligations in publishing its SA, Gladman have concerns regarding both the timing of its publication and the soundness of its contents.

The SA has been published post publication of the remitted policies document. In this respect it is not clear to what extent the SA process has informed the selection of the Council's preferred housing requirement. Publishing the SA of the Council's preferred options after they have been selected suggests that the outcomes of the SA process may have been pre-determined and the appraisal may have not properly informed the Council's policy choices.

Gladman consider the conclusions of the SA to be unsound. Gladman find there are several instances where scoring has lacked sufficient justification, or where scoring has been inconsistently applied. Gladman also believe that due to the publication of the Framework since the production of the original SA, the Council should revise the scope of the objectives of the SA to ensure their alignment to both the Core Strategy and the Framework. Gladman consider that the inclusion of Option A (a plan requirement of 14,000 dwellings) is unnecessary given that this figure was quashed by a High Court Order.

The only objective that shows a difference in the scoring of the impact between Option B; 17,130 dwellings (low end housing requirement) and Option C; 19,395 dwellings (mid housing requirement), and Option D; 20,220 (high housing requirement) is EC2. The Council consider Option B would see greater improvements brought to the North Somerset Local Economy as this would provide for a more significant gains in addressing balance in the jobs to home ratio of the Borough. Gladman question this reasoning and believe that there are wider factors worth considering that impact upon the performance of the local economy than solely that of the jobs to homes balance. The Development Economics Report appended to Gladman's January submission to the remitted policies document, considers that the quality of the jobs and housing in North Somerset is also of importance in determining the extent of which the local labour force is retained. Gladman believe that the additional economic benefits provided by new developments including boosts to the local construction industry, increases in local consumer spending and demand for public services is given insufficient weight by the findings of the SA.

Gladman believe that there are inconsistencies applied in the scoring of several sustainability objectives;

- In scoring for Objective SC11 (seeking to narrow the gap between income and house price/rents), Option A and B are identified as having zero impact by the Council, whilst the impact of Option C and D is scored as unknown. Although it is accepted that its extent of the impact is unknown, it is clear that option C and D

would have greater benefits. Therefore taken as currently written the SA misrepresents this fact as no positive distinction is made.

- In scoring for Objective SC1 (seeking to meet needs locally) and SC10 (meet the housing requirement), all newly tested options (B, C and D) are given an equal score. This is despite the fact that higher the growth options yield a greater provision of affordable housing. When considered in the context of the existing annual affordable need identified in the 2009 West of England SHMA (904 dwellings) the adoption of a higher housing requirement would clearly be more beneficial in meeting this identified need.

Due to the apparent marginal difference in the scoring of the range housing figures said to represent the Council's objectively assessed housing need (as identified in Table 4 of the supplementary SA report), the impact of the concerns highlighted above could be profound in defining the Council's housing strategy.

In reflection of the findings above, Gladman maintain that a higher housing requirement remains the most appropriate development strategy which reflects the objective assessed housing need on balance against both the objectives of adopted Core Strategy and the policies contained within the Framework.

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Highways Agency

Please see attached letter.

Highways Agency (S Walsh)

8141345//1

 [Highways Agency response.pdf](#) (1.3 MB)

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

kenco

5490401//1

I have serious concerns about the impact of this increase in the number of houses planned for this region. Our infrastructure appears to be stretched to its limit now - regarding hospital and doctor capacity, road transport links and a lack of suitable quality employment in the town to replace the high skilled jobs we have lost over the last 2 decades.

Also, in the light of the current flooding problems around the country, I wonder if it is wise to build over the airfield. I find this decision by planners to be very worrying. Furthermore the environment agency have advised me that "Floods operate in this area", so why have they approved the development of the airfield? I am afraid I am not filled with confidence as to the wisdom of this planning decision and I will be contacting my MP regarding this matter.

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

-
Mark Lewis
990177//1

If building 14,000 or 17,130 new homes will use most or all of the available non Green Belt land in North Somerset, where will the next 14,000 or 17,130 be built? Unless you can answer this question the proposal is obviously unsustainable. 17,078 words of technical analysis cannot disguise that. Is the basis of the policy one house per word? If so, please make it shorter.

I suggest that the only sustainable policy is for government to ask each local authority how many new homes they want to build and set a cap on net immigration based on the total. Local authorities should in turn ask each parish how many new homes they want.

The only requirement should be to build sufficient new homes to meet the natural demand of births exceeding deaths within North Somerset, which you say in 5.7 is just 243 dwellings per annum, not the 812 proposed.

The NPPF talks of need and demand for housing without defining these terms, so allowing scope for reasonable interpretation. I say 'need' is the natural demand of 243 dpa and 'demand' is the total of what each parish say they want. The latter figure can be determined from the parish local plans, eg Backwell (7.11) says 25 total over 2011-26, or by asking each parish.

If instead we are to take market demand as the criterion, searching rightmove for North Somerset and choosing the average house price of 250k as the max returns over 1000 homes of all kinds. Buyers are hardly priced out of the market here. Any market analysis would need some objective in the spectrum of prices returned from rightmove. What is that objective?

<p>If maximising self-containment is the principal criterion as EN1 says, the proposed increase from 14,000 to 17,130 which is admitted to decrease self-containment conflicts with this.</p>

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Nash Partnership

Please see attached PDF

Nash Partnership

9116129//1

 [13079_D01_001_Representations on sustainability appraisal_270214.pdf](#) (272 KB)

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Natural England

Please see attached pdf.

Natural England

1018753//1

 [nat eng 1.pdf](#) (150 KB)

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

Oil Pipe Line

Oil Pipe Line

931393//1

Thank you for your letter to GPSS, Government Pipelines and Storage Systems dated 30 January 2014 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 go to www.linesearchbeforeudig.co.uk our free online enquiry service.

 [Oil pipeline map.pdf](#) (2.5 MB)

North Somerset Core Strategy Sustainability Report- Revised Policy CS13

Consultation responses

Respondent

Comment

paul

9361121//1

I would challenge the assumption that the minimum growth option will allow compliance with policy EC11. It is stated that if housing growth and employment growth are in balance the effect on the transport infrastructure is neutral. This implies traffic is limited to commuting. Any development whether balanced or not will impact on traffic levels for leisure, social and industrial purposes and this can have a major impact particularly in rural areas where existing road networks are poor and where country lanes are already over-used and potentially dangerous. For example access to Winscombe is via congested Banwell, a road with a height restriction and a narrow country lane all of which are unsuited to higher traffic volumes

North Somerset Core Strategy Sustainability Report- Revised Policy CS13 Consultation responses

Respondent

Comment

-

Persimmon Homes Severn Valley

3361153//1

Please see attached letter.

 [Persimmon \(Turley\) response.pdf](#) (203 KB)

North Somerset Core Strategy Sustainability Report- Revised Policy CS13 Consultation responses

Respondent

Comment

University of Bristol

9368129//1

Please see attached submission.

 [58174 - SA Representation.pdf](#) (350 KB)

Report run at 3 Mar 2014 13:02:00. Total records: 17.