

North Somerset Council  
**Local Development Framework**

# **Core Strategy**

## **Submission**

**Summary of Key Issues at  
Publication stage**

# **North Somerset Core Strategy (Publication Version) Consultation Report: Regulation 30 1(e) June 2011**

## **1 Introduction**

1.1 This statement sets out the consultation and community involvement undertaken for consultation on North Somerset Council's Core Strategy Publication document. This is in accordance with Regulation 30 1(e) of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

1.2 This statement explains the consultation undertaken and details of who has been consulted, details of how they were consulted and a summary of the issues raised.

## **2. Consultation overview**

2.1 As well as ongoing engagement with stakeholders, the following stages of consultation have been undertaken in the preparation of the Core Strategy. The pre-publication stages of the consultation are described in the separate Regulation 30 1 (d) statement. This report covers the Publication stage.

## **3 Core Strategy (Publication version) consultation (9<sup>th</sup> February 2011– 23<sup>rd</sup> March 2011)**

3.1 The Core Strategy (Publication version) was published for public consultation for a period of six weeks from 9<sup>th</sup> February 2011– 23<sup>rd</sup> March 2011.

The publication documents were:-

- The Core Strategy - Publication version
- A map showing changes to the adopted Proposals Map
- The Sustainability Appraisal
- The Consultation Statement
- The Habitats Regulations Assessment

## **4 Core Strategy (Publication Version) consultation - record of activities**

4.1 The Council prepared a draft document and a covering report (**Appendix 1**) which was reported to the Council's Executive on 14<sup>th</sup> December 2010 and then formally agreed for consultation by the Council on 18th January 2011.

4.2 A Public Notice (**Appendix 2**) was inserted in the local press (on Wednesday 9 February in the North Somerset Times and on Thursday 10 February in the Weston and Somerset Mercury to ensure full coverage of the district) to inform the general public of the consultation period, where the documents could be viewed and how people could respond. This was in accordance with Regulation 27.

4.3 The Specific Consultation Bodies (as identified in Town and Country Planning (Local Development) (England) Reg 2004 Part 1 2 (1) and amended by Town and Country Planning (England) 2008 regulations 2. (2) (d) were sent copies of the Publication documents.

4.4 A letter or email was sent to general consultation bodies and all previous respondents who had commented on earlier versions of the Core Strategy. This stated what the Publication Documents were, where they could be viewed, along with an explanation of the role of the Core Strategy, previous consultations, the purpose of the current consultation, how to make representations, the time within which they should be received and what will happen to representations received. The fact that comments were also invited on the accompanying Sustainability Appraisal and Habitats Regulations Assessment was also stated.

4.5 A total of 1723 letters and 557 emails were sent.

4.6 The Core Strategy (Publication version) was available for inspection at all local libraries, the Town Hall in Weston-super-Mare and North Somerset Council's Castlewood Offices in Clevedon.

4.7 A Parish and Town Councils briefing was held on 18<sup>th</sup> February 2011.

4.8 A Core Strategy representation form (**Appendix 3**), based on the PINS model form and guidance notes was produced to record and categorise comments made. A copy was available to download on the website and submission of the form by email was encouraged. Respondents were also encouraged to use the Council's on-line consultation system for registering their views which was also set out in the format of the model form.

4.9 As this stage of the consultation on the Core Strategy was a formal, statutory stage and respondents were invited to make comments in relation to soundness and legal compliance only. Guidance notes were published to assist individuals and groups in making their representations (**Appendix 4**).

4.10 The Council's webpage was updated with the Core Strategy (Publication version) document and supporting information, including information papers and the evidence base. Throughout the consultation period there was clear signposting from the Council's homepage to the Core Strategy consultation webpage.

## **5 Main issues arising from the Core Strategy Publication version consultation**

5.1 The summary of issues raised in respect of the soundness consultation is given at **Appendix 5**.

The Council received a total of 364 on the Core Strategy (Publication Version) document from a total of 83 respondents. There were three responses relating to the sustainability appraisal and 18 relating to legal compliance (13 of these stated that the Core Strategy was legally compliant and 5 stated that it was not).



## Appendix 1

# North Somerset Council

# 11(2)

### **REPORT TO THE EXECUTIVE**

**DATE OF MEETING: 14 DECEMBER 2010**

**SUBJECT OF REPORT: CORE STRATEGY PUBLICATION VERSION**

**TOWN OR PARISH: ALL**

**OFFICER/MEMBER PRESENTING: LEADER/DEPUTY LEADER**

**KEY DECISION: YES**

### **RECOMMENDATIONS**

That Executive Committee recommend to Council that the Core Strategy Publication version is approved for consultation, with any subsequent alterations following consideration by Executive at this meeting to be agreed by the Director of Development and Environment in consultation with the Leader and Deputy Leader.

#### **1. SUMMARY OF REPORT**

1.1 The purpose of the report is to recommend to Council that the next stage of the Core Strategy, the Publication version, is approved. This is the version of the document which the Council proposes to submit to the Secretary of State for independent examination. There will be one further period of public consultation with representations sought in relation to the soundness of the document. Any representations received during that consultation period will be considered by an independent inspector.

1.2 The Publication version follows on from the Consultation Draft which was out for consultation between November 2009 and February 2010, and taking account of representations received as well as the new government's approach to planning issues, particularly regional planning and localism.

1.3 The principal changes to the Consultation Draft namely the reduced North Somerset-wide housing requirement, changes to the settlement strategy and the revised approach to new development at Weston Villages, were subject to informal consultation October - November 2010, and where appropriate, changes made in the light of comments received.

## **2. POLICY**

2.1 The Core Strategy reflects the aims and objectives of the Sustainable Community Strategy and gives expression to its land use implications.

## **3. DETAILS**

3.1 The Core Strategy Consultation Draft was subject to public consultation between 30 November 2009 and 19 February 2010. The Consultation Statement and summaries of individual responses received are available to view on the Council's website. The summary of the key issues raised is set out at Appendix 1.

3.2 The Consultation Draft was written at a time of considerable uncertainty over the future of the draft RSS, and many of the representations related to the proposed urban extensions and changes to the Green Belt. Following the general election, the coalition government announced that it would 'rapidly abolish' Regional Strategies and return decision making powers on housing and planning to local councils, and that consequently decisions on housing supply were to be made without the framework of regional numbers and plans. The Executive report of 20 July 2010 identified the key principles underpinning the Council's approach to growth and development to 2026. These have now been incorporated into the Publication version.

- Protection of the Green Belt.
- No development at SW Bristol.
- Main strategic objective is Weston employment-led regeneration plus supporting infrastructure.
- Regeneration of Weston town centre.
- New residential development at Weston to be led by place-making and community-building principles, not top-down housing numbers.
- Elsewhere in the district housing will be restricted, with new development reflecting community needs and aspirations.
- Infill development to be more sensitive in respect of density, design and environmental impact.
- A new locally-derived housing requirement for the district will be investigated and tested.

3.3 Three key changes to the Core Strategy Consultation Draft were identified and these were subject to public consultation October-November 2010. These related to the new North Somerset housing requirement, the settlement strategy and the approach to development at Weston Villages. A summary of the response to the Key Changes consultation is attached at Appendix 2.

3.4 In November 2010 the Secretary of State's decision to revoke the regional strategies was successfully challenged in the courts. As a consequence, the status of the existing adopted RPG10 is restored as part of the development plan. However, the government has reiterated that it remains committed to revoking regional strategies and will be making provision for this in the forthcoming

Localism Bill, although it is not anticipated that this will be enacted until July 2011. The draft RSS was not adopted and is therefore not part of the development plan. Furthermore, there is no intention to adopt the draft RSS, the organisations responsible for its preparation have been or are being abolished, and the proposals conflict with the government's stated intention that Green Belt will be protected.

3.5 As the Core Strategy will not be adopted until after the intended formal revocation of regional strategies, the Publication version is written on the basis that this will take place, and that the local planning authority will be preparing its Core Strategy without the framework of regional numbers and plans.

### Key Changes

#### a) North Somerset housing requirement

3.6 The intention to revoke regional strategies and the removal of top-down housing numbers means that local authorities need to identify new locally-derived housing requirements. Independent advice was commissioned and this report ('North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2026' October 2010) was part of the Key Changes consultation and is available on the website.

3.7 This report comprised two parts which together examine alternative methods of approach taking account of demographic changes, economic growth and development capacity, leading to the identification of a new North Somerset housing total. It identified the key problem of relatively weak local economic growth and lower house prices compared to the rest of the sub-region which has led to high housing demand and encouraged out-commuting. The key principles identified for setting an appropriate level of growth were:

- a) Help to ensure a healthy economy by closely linking housing growth to employment (employment-led growth).
- b) Provide sufficient housing to meet local needs.
- c) Accept that market forces allow movement and freedom of choice and that people, especially those not tied to employment, may choose to move into the district.
- d) Accept that there are capacity constraints including environmental limits, infrastructure delivery and transport capacity.

3.8 Different ways of producing a housing growth figure were considered. It was concluded that although there was no 'right' answer, a method based on economic growth forecasts was favoured. Based on this, the recommended housing requirement for North Somerset for the period 2006 – 2026 was a minimum of 13,400 dwellings assuming the delivery of 10,100 jobs. This level of housing growth is approximately half of that envisaged by the Regional Spatial Strategy (26,750), and less than that suggested in the Consultation Draft (17,750). The main reasons for the differences are:

- The new requirement is based on a jobs-led policy approach – a realistic assessment of how many new jobs may come forward, and how many new homes would be needed to support this job growth.

- The impact of the economic recession has been taken into account.
- The work on the RSS target took place over five years ago in very different economic circumstances.
- The previous RSS approach looked to focus development in the South West at the main urban areas - consequently North Somerset had to accommodate some of the needs of the Bristol urban area.
- Reduced levels of in-migration.

The conclusion was that based on a proposed growth of 10,100 jobs over the plan period, that the North Somerset housing target should be a minimum of 13,400 dwellings.

3.9 Most of the respondents to the Key Changes consultation (Appendix 2) supported the reduced housing requirement on the grounds that it better reflected the needs of local communities, environmental and infrastructure constraints. Some argued that the housing figures were still too high. Developers, particularly those who had interests at SW Bristol were strongly critical of the approach. This included criticism that the numbers were too low and failed to meet the needs of the sub-region, the plan failed to take RSS into account as this is now again part of the development plan, the methodology was flawed in respect of the treatment of household formation rates, the emphasis on job growth particularly in a time of recession, and that the needs of existing and future households would not be met and affordable housing would not be delivered.

3.10 In order to be sound the Core Strategy must be justified (founded on a robust and credible evidence base, and be the most appropriate strategy when considered against the reasonable alternatives), effective (deliverable, flexible and able to be monitored) and consistent with national policy (including general conformity to the Regional Spatial Strategy). In terms of assessing against reasonable alternatives the alternatives would be to continue the existing structure plan housing requirement of 993 dwellings pa or 19,860 over the plan period, or to use the draft RSS total of 1,300 dwellings pa or 26,750 dwellings. Both of these targets were produced in the context of very different economic conditions, and will cause environmental harm to the character and functioning of the district, and result in increased out-commuting contrary to the objectives of the Core Strategy. The RSS total also included 9,000 dwellings in the Green Belt which is contrary to government policy. The recommendation is that with an assumption of 10,100 jobs over the plan period the proposed North Somerset housing requirement of at least 13,400 dwellings is included within the Publication version. This relationship between jobs and housing would need to be monitored and reviewed over five year periods. This methodology only takes into account the future relationship between jobs and homes, not the existing backlog in Weston (see 3.18).

#### b) Settlement strategy

3.11 The approach as set out in the Consultation Draft which, apart from the service villages, treated all other villages in policy terms as countryside where there would be a restrictive approach to further development, was criticised by several respondents. Many felt that that limited infilling could benefit some smaller communities, some redevelopment opportunities might be missed and



that the overall approach was too restrictive. The Key Changes consultation proposed a new category of infill villages where new residential development of one or two dwellings, or community-led redevelopment within settlement boundaries would be acceptable. As part of the localism agenda, local communities were given the opportunity to influence the choice.

3.12 The response to the Key Changes consultation (Appendix 2) was generally supportive of the inclusion of the infill villages category, although several respondents proposed different categories for specific villages. A summary of the proposed approach in the Publication version is as follows:

Weston: Strategic focus for growth; Weston Villages proposals; development acceptable within settlement boundaries.

Clevedon, Nailsea and Portishead: Development acceptable within settlement boundaries. At Nailsea any additional mixed use allocation to meet local needs must be promoted as a formal allocation and including an amendment to the settlement boundary, but not in the Green Belt.

Service villages (Backwell, Banwell, Churchill, Congresbury, Easton in Gordano/Pill, Long Ashton, Winscombe, Wrington and Yatton): Small-scale development (up to 10 units) acceptable to support local objectives. Opportunity for communities to promote other sites to meet local needs, but only as formal allocations and including an amendment to the settlement boundary.

Infill villages (Bleadon, Claverham, Cleeve, Dundry, Felton, Flax Bourton, Hutton, Kenn, Kewstoke, Locking, Sandford, Uphill and Winford): Infilling of 1 or 2 dwellings acceptable; redevelopment within settlement boundaries acceptable where community-led.

Smaller settlements and countryside: No settlement boundaries - restrictive approach to new development.

3.13 The consultation also raised the issue of how communities could pursue schemes to deliver local objectives such as a better mix of housing, including affordable housing, employment or community facilities without them being vulnerable to speculative development pressures. Where this is not possible within existing settlement boundaries, the Publication version provides the opportunity for places such as Nailsea and the service villages to promote sites to meet identified local needs provided this is undertaken as a formal site allocation in the Site Allocations DPD and, where appropriate, involves an amendment to the settlement boundary. Such allocations are not acceptable in the Green Belt.

3.14 A further issue which needs to be addressed is the interpretation of Replacement Local Plan Policy H/7 v) which states that housing within village settlement boundaries should not lead to urban housing needs being met in locations which would add to or contribute to creating dormitory settlements with high levels of out-commuting. The acceptable forms of development to meet this test have been identified as age-restricted and special needs housing, affordable housing and live/work units. The latter has proved to be unpopular in terms of the

need for, and impact of the employment units, and the Publication version has been prepared to ensure that the overall approach to village development and any subsequent detailed development management policy is clear that housing in villages will not be required to meet any such test. That is, new housing granted permission within either service villages or infill villages in accordance with the new policy approach will not be required to demonstrate that they are not contributing to out-commuting.

### c) Weston Villages

3.15 The third of the Key Changes related to the new approach to development at Weston Villages as set out in the Executive Report of 20 July 2010. This set out a number of principles which should underpin the approach to the development of Winterstoke and Parkland Villages with an emphasis on place making and community building. It is anticipated that the two new villages together would deliver about 5,000-6,000 dwellings. The approach set out in the Consultation Draft which was based on an RSS urban extension proposal needs to be revised and a new strategic diagram identified. This would then provide the context for more detailed masterplanning in the form of the Weston Villages Supplementary Planning Document.

3.16 The response to the Key Changes consultation (Appendix 2) was generally supportive of the revised approach, particularly the village concept provided that community-led objectives could be delivered and that infrastructure and services were provided early on. However, a number of developers made comments about specific sites and the scale of growth at Weston. In particular Mead Realisations objected to the fixing of the overall numbers and extent of Parklands Village ahead of the masterplanning process, and the need in their view to allocate land east of M5 junction 21.

3.17 Policy CS30 and the strategic diagram in the proposed Publication version have been revised in accordance with the approach set out in the Key Changes consultation.

### Other issues

#### Employment-led

3.18 The revised housing requirement reflects the anticipated job growth across North Somerset over the plan period. This is presented as a minimum which could increase as part of a future review of the Core Strategy should job growth be delivered at a much faster rate than anticipated. Within Weston evidence indicates that there is an existing backlog of jobs in relation to housing which needs to be addressed over and above the 10,100 jobs target for the district as a whole if self-containment is to be improved. In 2001 Census figures indicate that for Weston the shortfall between out-commuting and in-commuting was 3,388 jobs. Since then the situation has deteriorated given the amount of housing delivered and the weakness of the local economy. In addition, at Weston the employment opportunities are poor in respect of B jobs (particularly offices and general industrial). The overall jobs target for North Somerset is therefore a minimum of 10,100 plus backlog at Weston which equates to about 14,000 jobs.

3.19 The approach to employment development in the Publication version is as follows:

Weston Villages: Housing provided in step with job growth using 1:5 B Use Class jobs per home.

Weston urban area (outside Weston Villages): Sites of 10+ dwellings provide 1.5 B Use Class jobs per home, or to provide off-site contributions. Resist loss of employment sites. Provide opportunities within town centre and gateway, particularly office development north of station.

Elsewhere: Support for employment development within settlement boundaries. Resist loss of employment uses in the three towns.

Employment development will be monitored and reviewed over the plan period in 5 year tranches to ensure that key objectives are being delivered, particularly in relation to the balance between homes and jobs.

#### Retail

3.20 The Consultation Draft reflected the North Somerset Retail and Leisure Study of 2006. This is currently being updated and the Publication version reflects the new figures which take account of current economic conditions and the new North Somerset housing requirement. The Core Strategy approach is to reinforce the importance of the town centre at Weston, particularly Dolphin Square, to make appropriate provision at Weston Villages, and to resist further retailing in the gateway area (retail parks). Elsewhere there is little identified need for new retail floorspace, but a recognition of the need to regenerate existing town centres.

#### Older people, care homes and drug and alcohol rehabilitation

3.21 The Consultation Draft did not emphasise enough the issue of the ageing population and its implications both in planning terms and corporately. This has been addressed with the inclusion of a new priority objective ('Make provision for the needs of an ageing population, prioritising supported living as opposed to residential care') and other references particularly to Policy CS26 Supporting healthy living and the provision of health care facilities. References have also been included in relation to the current overprovision of drug and alcohol rehabilitation centres within the district again with an addition to the priority objectives, and amendments to CS26. These issues will be considered in detail by the Strategic Planning and Economic Development Policy and Scrutiny Panel on 6 December 2010.

#### Weston Town Centre Area Action Plan

3.22 The Weston Town Centre Area Action Plan Preferred Options was published in July 2009 and subject to consultation. As a result of the changed economic situation from when the plan was originally drafted which has resulted in several of the sites not progressing as anticipated, it is proposed to merge the work done to date on the AAP with the Development Management and Site Allocations DPDs. This has some implications for the Core Strategy which have been incorporated into the Publication version, most notably the need to include a new

diagram to identify the location of the three sub-areas referred to in CS29 – the retail core, seafront and gateway. There is also a separate need to review delivery mechanisms for town centre sites to encourage a better commercial response.

#### Development Management and Site Allocations Development Plan Documents

3.23 The Core Strategy provides the higher level policy ‘hooks’ for the more detailed development management policies and site allocations. The work on these two DPDs is being co-ordinated by the Strategic Planning and Economic Development Policy and Scrutiny Panel, and a set of draft policies will be formally presented to Members in Spring 2011 for consultation. Together these will roll-forward the existing Replacement Local Plan with revised policies on, for example, parking, garden grabbing and care homes, and new allocations for uses such as housing and employment, or to define revised settlement boundaries or strategic gaps.

#### Sustainability Appraisal and Habitats Regulations Assessment

3.24 The Core Strategy has been subject to a process of sustainability appraisal to assess the economic, social and environmental sustainability of the plan to assess whether the strategy is the most appropriate given reasonable alternatives. The sustainability appraisal of the Publication version will be made public as part of the consultation process. Similarly the Consultation Draft was subject to Habitats Regulations Assessment; this is being updated in the light of changes proposed in the Publication version.

#### Publication version

3.22 The Publication version follows the same format as the Consultation Draft, and most of the policy areas remain the same, albeit with minor amendments as appropriate. The principal changes to the document are summarised at Appendix 3. The full text of the draft Publication version is attached at Appendix 4. The Publication document will be formally considered by Council on 18 January 2011. If approved, the document will be subject to public consultation on the soundness of the plan, before a Submission document is approved and submitted to the Secretary of State. An examination is expected to be held in Autumn 2011 with adoption in March 2012.

## **4. CONSULTATION**

Public consultation has taken place in accordance with the Statement of Community Involvement at the Issues and Options and Consultation Draft stages. In addition, consultation was undertaken on proposed Key Changes October-November 2010, including workshops and briefings with district councillors and town and parish council representatives.

## **5. FINANCIAL IMPLICATIONS**

Preparation of the Core Strategy is undertaken within existing budgets. The government is introducing financial incentives to stimulate housebuilding through the proposed New Homes Bonus.

## **6. RISK MANAGEMENT**

The Council needs to clarify the strategic planning context through adoption of the Core Strategy to minimise the risk of inappropriate development being granted permission at appeal, and to support other policies and strategies.

## **7. EQUALITY IMPLICATIONS**

The Core Strategy covers several key areas with equality implications such as the creation of mixed and balanced communities, good design, access to facilities and affordable housing.

## **8. CORPORATE IMPLICATIONS**

The Core Strategy has wide ranging corporate implications in that it sets out the spatial planning implications for the district and will therefore have implications for, for example, future service delivery and the implementation of infrastructure.

## **9. OPTIONS CONSIDERED**

Not to proceed with the Core Strategy would increase uncertainty and potentially make the authority vulnerable to speculative development proposals.

## **AUTHOR**

Michael Reep, Planning Policy Manager 01934 426775

## **BACKGROUND PAPERS**

Core Strategy Consultation Draft (November 2009).

Core Strategy Consultation Draft Consultation Statement (October 2010).

Core Strategy Executive Report 20 July 2010.

North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2026, Keith Woodhead (October 2010).

Core Strategy Key Changes consultation (October 2010).

Development Contributions Supplementary Planning Document Consultation Draft November 2010.

Weston Town Centre Area Action Plan Preferred Options July 2009.

## Appendix 2



### NORTH SOMERSET COUNCIL

#### Planning and Compulsory Purchase Act 2004

#### North Somerset Local Development Framework Core Strategy

#### Notice of publication of the Core Strategy (Publication version) Development Plan Document and accompanying documents for consultation

Notice is hereby given, in accordance with regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended by the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 that North Somerset Council has published the **North Somerset Council Core Strategy** and following consultation it proposes to submit this to the Secretary of State.

#### **Proposed subject matter and area of Development Plan Document:**

The Core Strategy is a district-wide strategic framework for growth and development up to 2026. It includes policies that set out the broad scale and location of new housing and employment development, transport and environmental policies.

#### **Period for representations:**

Representations should relate only to the “soundness” of the Core Strategy. The proposed consultation period starts on Wednesday 9 February and representations on the proposals must be received by midnight **Wednesday 23 March 2011**. Either:

- respond on-line at [www.consult-ldf.n-somerset.gov.uk](http://www.consult-ldf.n-somerset.gov.uk)
- download copies of documentation via the Councils [Core Strategy](#) webpage and submit via email to [planning.policy@n-somerset.gov.uk](mailto:planning.policy@n-somerset.gov.uk)
- or post to Planning Policy, Development and Environment, North Somerset Council, Somerset House, Oxford Street, Weston-super-Mare, BS23 1TG

Copies of this Statement, the Publication Core Strategy Publication Version and related and supporting documents are available for inspection during normal opening hours at:

- Town Hall, Walliscote Grove Road, Weston-super-Mare, BS23 1UJ, also at Castlewood, Tickenham Road, Clevedon, BS21 6BD.
- Copies of the Core Strategy publication Version can also be inspected at Council libraries. For details of opening hours see [www.n-somerset.gov.uk](http://www.n-somerset.gov.uk)

David Turner  
Director Development and Environment

## Appendix 3

### North Somerset Council Core Strategy Publication Version February 2011

Office use only. Respondent rep no.
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## Representation Form

In completing this representation you are providing a formal consultation response under Regulation 27 of the Town and Country Planning (Local Development)(England) Regulations 2008.

Please note that your name and comments (and organisation where applicable) will be made publicly available.

This form has two parts:

**Part A** Personal details.

**Part B** Your representation.

Please complete separate copies of Part B for each vision, objective, policy, or diagram against which you wish to comment.

Guidance notes are available which explain the meaning of "Soundness" and "Legal Compliance". If you believe a part of the document to be unsound with regard to more than one policy etc, please provide a separate representation (separate copies of Part B) for each comment you wish to make.

Comments relating to the Sustainability Appraisal should be submitted separately.

Completed forms **must** be received by midnight 23 March 2011.

Email to: [planning.policy@n-somerset.gov.uk](mailto:planning.policy@n-somerset.gov.uk)

Post to:

**Planning Policy Team,  
North Somerset Council,  
Somerset house,  
Oxford Street,  
Weston-super-Mare  
BS23 1TG**

## Part A Personal details

You will only need to complete this part once for all comments made.  
You need to supply the following information in order for you representation to be valid (duly made).

	<b>Personal Details</b>	<b>Agents Details</b> (if applicable)
Title		
Initial		
Last Name		
Organisation (where relevant)		
Street Address		
Village		
Town		
County		
Postcode		
Daytime Telephone No.		
Email Address		

**You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B to this part of the representation form.**



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Response rep no.

## Part B Your representation

Your name or organisation: .....

**Please identify the part of the Core Strategy to which this representation refers:**

- Vision number (pages 15 – 18)
- Priority Objective number (page 20)
- Policy number  
(includes supporting paragraphs to policy)
- Diagram i.e. Key Diagram, Inset 1 or Inset 2

**Key Diagram** (Key Diagram page 149)  
**Inset 1** (CS29 Weston-super-Mare Town Centre page 115)  
**Inset 2** (CS30 Weston Villages page 126)

You must complete a separate Part B of this form for each section, policy, or diagram on which you wish to comment.

**Question 1: Soundness of the Core Strategy**  
 (Please refer to accompanying guidance notes for meanings)

a) Do you consider this part of the Core Strategy to be sound: Yes/No  
(i.e. do you support the Core Strategy)

b) If you consider this part of the Core Strategy to be unsound, please identify which of the three test of soundness below your representation relates to. Otherwise go to questions 2 and 3.

**Justified** (based on robust and credible evidence, better than any reasonable alternatives)

i) If you consider this part of the Core Strategy is unsound because it is not **justified** (based on robust and credible evidence, better than any reasonable alternatives) please explain why.

ii) Please give details of the change(s) you wish to see and why you consider them necessary to make this part of the Core Strategy **justified**. Please be as concise and precise as possible.

**Effective** (Deliverable, flexible and able to be monitored)

i) If you consider this part of the Core Strategy to be unsound because it is not **effective** (deliverable, flexible and able to be monitored) please explain why.

ii). Please give details of the change(s) you wish to see and why you consider them necessary to make this part of the Core Strategy **effective**. Please be as concise and precise as possible.

## Consistent with National Policy

i) If you consider this part of the Core Strategy to be unsound because it is not **consistent with national policy** please explain why

ii) Please give details of the change(s) you wish to see and why you consider them necessary to make this part of the Core Strategy **consistent with national policy**. Please be as concise and precise as possible.

*Please note your representation should cover succinctly all the information, necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage further submissions will only be at the request of the inspector, based on the matters and issues he/she identifies for examination.*

### Question 2: Examination

a) Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate at the examination hearing? Please note: written representations carry as much weight as attendance at a hearing and will be given equal consideration.

Written Representations

Attend Examination Hearing

b) If you wish to participate at the examination hearing please outline why you consider this to be necessary ie how it would add to your representation.

**Please note:** The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing.

**Question 3: Legal Compliance**

Do you consider the Core Strategy Publication Version to be legally compliant?  
(Please refer to accompanying guidance notes for meanings)

Yes/No

If you have answered no to this question, please state why:

Signature.....

Date.....

## Appendix 4

# North Somerset Council Core Strategy Publication Version Guidance for completing the representation form

## 1 Introduction

1.1 The Core Strategy development plan document (DPD) is published in order for representations to be made prior to submission. The representations will be considered alongside the published DPD when submitted, which will be examined by a Planning Inspector. The Planning and Compulsory Purchase Act 2004 (as amended)<sup>1</sup> (the 2004 Act) states that the purpose of the examination is to consider whether the DPD complies with the legal requirements and is 'sound'.

## 2 Legal Compliance

2.1 The Inspector will first check that the DPD meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness.

### **You should consider the following before making a representation on legal compliance:**

- The DPD in question should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Local Planning Authority (LPA), setting out the Local Development Documents it proposes to produce over a 3 year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If the DPD is not in the current LDS it should not have been published for representations. The LDS should be on the LPA's website and available at their main offices.
- The process of community involvement for the DPD in question should be in general accordance with the LPA's Statement of Community Involvement (where one exists). The Statement of Community Involvement (SCI) is a document which sets out a LPA's strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning applications.
- The DPD should comply with the Town and County Planning (Local Development) (England Regulations) 2004 (as amended)<sup>2</sup>. On publication, the LPA must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The LPA must also place local advertisements and notify the DPD bodies (as set out in the regulations) and any persons who have requested to be notified.
- The LPA is required to provide a Sustainability Appraisal Report when they publish a DPD. This should identify the process by which the Sustainability

Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.

- The DPD must have regard to any Sustainable Community Strategy (SCS) for its area. The SCS is usually prepared by the Local Strategic Partnership which is representative of a range of interests in the LPA's area. The SCS is subject to consultation but not to an independent examination.

### **3 Soundness**

3.1 Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning in paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text<sup>3</sup>. The Inspector has to be satisfied that the DPD is justified, effective and consistent with national policy. To be sound a DPD should be:

#### **• Justified**

This means that the DPD should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area; and
- Research/fact finding: the choices made in the plan are backed up by facts.

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

#### **• Effective**

This means the DPD should be deliverable, embracing:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.

The DPD should also be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals.

Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation.

Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the DPD needs amendment.

- **Consistent with national policy**

The DPD should be consistent with national policy. Where there is a departure, LPAs must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the LPA should include a policy or policies which would depart from national policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national policy and support your assertion with evidence.

### **3.2 If you think the content of a DPD is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:**

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the DPD on which you are seeking to make representations or in any other DPD in the LPA's Local Development Framework (LDF). There is no need for repetition between documents in the LDF.
- If the policy is not covered elsewhere, in what way is the DPD unsound without the policy?
- If the DPD is unsound without the policy, what should the policy say?

## **4 General advice**

**4.1 If you wish to make a representation seeking a change to a DPD or part of a DPD you should make clear in what way the DPD or part of the DPD is not sound having regard to the legal compliance check and three tests set out above.** You should try to support your representation by evidence showing why the DPD should be changed. It will be helpful if you also say precisely how you think the DPD should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

4.2 Where there are groups who share a common view on how they wish to see a DPD changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

4.3 Further detailed guidance on the preparation, publication and examination of DPDs is provided in PPS12 and in The Plan Making Manual<sup>4</sup>.

## **Endnotes**

1. View the 2004 Act at:

[http://www.opsi.gov.uk/acts/acts2004/ukpga\\_20040005\\_en\\_1](http://www.opsi.gov.uk/acts/acts2004/ukpga_20040005_en_1)

View the amending 2008 Act at:

[http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga\\_20080029\\_en.pdf](http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga_20080029_en.pdf)

2. View the 2004 Regulations at:

<http://www.opsi.gov.uk/si/si2004/20042204.htm>

View the 2008 amending Regulations at:

[http://www.opsi.gov.uk/si/si2008/pdf/uksi\\_20081371\\_en.pdf](http://www.opsi.gov.uk/si/si2008/pdf/uksi_20081371_en.pdf)

View the 2009 amending Regulations at:

[http://www.opsi.gov.uk/si/si2009/pdf/uksi\\_20090401\\_en.pdf](http://www.opsi.gov.uk/si/si2009/pdf/uksi_20090401_en.pdf)

3. View Planning Policy Statement12 at:

<http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp>

4. View the Plan Making Manual at:

<http://www.pas.gov.uk/pas/core/page.do?pagelId=51391>



**SUMMARY OF MAIN ISSUES**

Regulation 30 1(e) of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

This document identifies, on the basis of the responses received to the soundness consultation on the Core Strategy Publication version, the main issues. Of these, a number of key issues are identified which are expected to form the focus of the examination debates. Other more specific issues raised are summarised in the table below on a policy by policy basis.

**Key issues**

**Justification for the district-wide housing requirement.**

Is the proposed level of residential development of 13,400 dwellings justified, particularly in relation to the 26,750 dwellings proposed in the draft RSS? What weight should be given to the draft RSS? Does the evidence base support higher numbers in terms of population projections, housing needs and sub-regional requirements in relation to Bristol? What are the contingencies if higher housing numbers are required?

**Justification for the employment requirement.**

What is the justification for the scale and distribution of employment? What is the evidence supporting the net increase of 10,100 jobs and the need to address the backlog at Weston? What is the most appropriate spatial distribution of employment across North Somerset?

**The employment-led approach.**

Is the employment-led approach deliverable? Is the 1.5 B jobs per dwelling target at Weston Villages achievable or will it restrict residential delivery? What are the consequences if jobs are not delivered at the rate envisaged?

**The spatial strategy.**

Is the over-reliance on Weston appropriate, or should there be a more dispersed approach? Should the towns of Clevedon, Nailsea and Portishead play a greater role? In particular, is there scope at Nailsea for a greater scale of growth, including potential development in the Green Belt? Is the categorisation of the service villages and infill villages appropriate – should some settlements be identified for a greater scale of growth? Should there be more scope for development in the rural areas to support sustainability such as the scale of development within villages or scope for development adjacent or outside settlements?

### **Strategic growth at Weston**

How critical is the strategic objective of securing employment-led growth to improve self-containment and support regeneration? Is the Core Strategy too reliant on a single strategic allocation at Weston Villages where delivery issues may delay or slow development rates? Is the proposed approach for Weston Villages appropriate in terms of the scale, capacity and form of development? What is the role for the rest of the Weston urban area?

### **Role of the Green Belt.**

Is a Green Belt review required to address the need for additional housing/employment land? Need to consider the suitability of Green Belt land at SW Bristol to better meet sub-regional housing requirements, or land on the outer edge such as at Nailsea. Should new employment be allowed in the Green Belt?

### **Flooding.**

Are the flood mitigation measures proposed for Weston achievable?

### **Infrastructure.**

Are the infrastructure requirements required to support the spatial strategy deliverable? In particular, are the highway schemes achievable during the plan period? How is infrastructure prioritised?

### **Meeting housing needs.**

How far can the Core Strategy address identified affordable housing needs and is the proposed approach fully justified? How will Gypsy and Traveller site requirements be addressed?

### **Bristol Airport and Royal Portbury Dock**

Does the Core Strategy make clear the Council's vision for Bristol Airport and Royal Portbury Dock and does the policy cover all the relevant issues?

## Issues by Chapter

The following table provides a summary of the main issues raised. It is not intended to be comprehensive and more specific details will be found in respect of the individual responses to the consultation.

Core Strategy policy and summary of issues.
<b>CS1: Addressing Climate Change and Carbon Reduction</b> <ul style="list-style-type: none"><li>• Biodiversity bullet point needs to better reflect national legislation.</li><li>• Reference needed to impact of Bristol Airport.</li><li>• No reference to water efficiency measures.</li><li>• Lack of evidence base for approach to on-site renewable energy.</li><li>• Approach to renewable energy not practical, specific or deliverable.</li><li>• Object to preference given to previously developed land.</li><li>• No mention of modal shift to rail to support carbon reduction.</li><li>• Reference to South West Bristol as the most significant way of achieving low carbon development.</li><li>• Requirements are duplicated with other policies.</li><li>• Policy unreasonably focuses on new development, not existing.</li></ul>
<b>CS2: Delivering Sustainable Design and Construction</b> <ul style="list-style-type: none"><li>• Core Strategy should not refer to code levels as this is no longer a requirement.</li><li>• Need to make reference to water consumption measures.</li><li>• There is no evidence base to support the approach to renewable energy.</li><li>• Policy for energy efficiency is superfluous due to building regulations addressing the issue.</li><li>• Policy is not the appropriate strategy when considered against reasonable alternatives.</li><li>• Core Strategy has significant potential to become out of step with national policy e.g. the path to zero carbon.</li><li>• Up to 5% of on-site renewables should be sought.</li><li>• Policy CS2 should go further.</li></ul>

- Additional reference should be made to quality and appropriateness of materials.
- Need to make reference to the cumulative effect of drainage issues.
- Make reference to Ashton Park as it has demonstrated it can achieve a 'very high standard' of sustainable design and construction.
- Concern over the implications of code level compliance on delivery of housing.
- Question the requirement for Lifetime Homes standard.
- Application of standards should be subject to viability testing.

### **CS3: Environmental impacts and flood risk assessment**

- Policy is unnecessary – adds nothing to national policy.
- Cross-references to PPS25 may be nullified if national policy is changed/withdrawn.
- Wording should specify 'acceptable' level and who decides it.
- Add information note on coal mining legacy.
- Flood risk should determine spatial strategy - spatial strategy should not determine how flood risk is assessed.

### **CS4 : Nature Conservation**

- The policy does not provide absolute protection for ancient woodland and trees, due to use of the word 'seek'.
- References to meeting biodiversity targets and protecting and enhancing habitats should be strengthened.
- Need to balance the needs of the population with biodiversity and the protection of the natural environment.
- Promoting native tree planting is not a valid policy requirement in a policy which seeks to enhance biodiversity. It is more important that bio-diversity is achieved and enhanced in the most appropriate way which may be achieved by native, or non-native species.
- The policy should specifically allow replacement of a hedgerow or tree, as there may be instances where it is better to remove a hedgerow, or tree, which does not make a positive contribution.

### **CS5: Landscape and the historic environment**

- Supporting text should also reference Clevedon Pier, grade 1 listed and Clevedon Hall as examples of listed buildings.

**CS6: Green Belt**

- A Green Belt review is required (RPG10 SS4) to allow sustainable sites to be brought forward and additional Green Belt to be designated.
- Reasonable alternatives to the protection of the Green Belt have not been considered.
- Inflexible approach does not allow sites to be considered in the Site Allocations Development Plan Document.
- Conflicts with other policies such as sustainability and employment.
- No further airport car parking on Green Belt land should be allowed.
- Potential to relax the Green Belt at the port when justified.
- Small scale changes to the Green Belt to support sustainable development and viability of settlements should be considered.
- Fails to take into account demand for housing which can only be met at urban extensions.
- The review of Green Belt has been subject to detailed assessment and credible evidence and confirms that exceptional circumstances exist.
- Employment-led approach at Weston is insufficient to meet needs.

**CS7: Planning for Waste**

- The requirement for development to be designed to facilitate easy and efficient waste collection is not justified. It is inappropriate to require new development to contribute to facilities that are not available elsewhere, such as in existing residential areas.

**CS8: Minerals Planning**

- The general extent of the Mineral Safeguarding Areas should be shown on the Key Diagram. To overcome this efficiency, general mineral resources should be shown on an appropriate illustration to give the plan user some guidance.
- North Somerset should contribute 40% of the sub-regional apportionment and the word 'towards' should be deleted.
- The crushed rock contribution should continue throughout the entire period of the Core Strategy.

- It should be made clear that there will be a land bank maintained throughout the period of the Core Strategy and a land bank of at least 10 years should be in place at the end of 2026.
- It would be helpful to provide the apportionment figure for North Somerset rather than just the regional figure
- The policy fails to take account of the need to move aggregates by means other than road, notably rail.

### **CS9: Green Infrastructure**

- The policy should promote the protection of disused railway corridors for use as cycle tracks.
- The phrase 'priority will be given to' is unclear in development management terms. It would perhaps be clearer to replace it with 'the following measures are particularly important'.
- The reference to 'protection of wildlife sites' is unclear as to whether it applies to designated sites, undesignated sites or both. It would be better to refer to protection and enhancement of biodiversity.
- It is not clear how small developments will be able to provide strategic green spaces, and whether they will be expected to make financial contribution to off site strategic green spaces.
- The policy fails to take account of the need for green infrastructure for the West of England Partnership area, including a green corridor and wildlife corridor around Greater Bristol.
- Incorporation of a map at least depicting the priority areas for green infrastructure that could be viewed alongside or as part of the Key Diagram would make the document clearer and more effective. It would also be consistent with the other emerging Core Strategies in the West of England.

### **CS10:Transportation and Movement Policy**

- Must emphasis the need to reduce all car travel not just commuting by car.
- Development at Weston will increase congestion through Banwell.
- The reopening of the Portishead Rail link may increase commuting levels to Bristol and act against self sufficiency for Portishead.
- Portishead rail link should not include the possibility of being used as a rapid transit bus link.
- Barrow Gurney bypass should be given a higher priority.
- Core Strategy needs to identify bus rapid transit extension to Bristol Airport.
- The Weston Southern Rail Chord needs to be included as a major scheme.
- Priority should be given to the Junction 21 Relief Road.

- Urgent need for a Park and Ride at Weston.
- List of major schemes should be prioritised.
- Need a policy to improve rail links e.g. electrification.
- Highway schemes are ambitious and will not be delivered within the plan period.
- Concern about increased traffic along A369 from Junction 19 to Bristol.

#### **CS11: Parking**

- Need to consider issue of coach parking at Weston.

#### **CS12: Achieving high quality design and place-making**

- Policy is too general and unfocussed.
- Policy is unjustified.
- Repeats national policy.
- Not clear how policy will be implemented.
- Requirements for the Design and Access Statement are unclear.
- Object to Secured by Design approach as being inflexible.
- The Building for Life requirements are confusing.
- No local interpretation of national policy.

#### **CS13: Scale of new housing**

- District housing requirement is too low and will not meet the needs of North Somerset or the wider sub-region. Need to take account of national household projections.
- Figures should be increased to 24,000 (higher scenario in Woodhead report), 26,750 (draft RSS level) or higher.
- Draft RSS should be given significant weight, particularly the housing targets.
- Lack of supply of housing increases prices and reduces affordability of the stock – which is compounded by low levels of supply of affordable housing.
- Need to ensure that employment-led approach works so as to avoid adverse impact on M5.
- Need to address government growth agenda.

- Economic downturn shouldn't be used as an excuse to massage down housing figure.

#### **CS14: Distribution of new housing**

- Need to allocate land at SW Bristol as an urban extension.
- Employment-led approach at Weston will limit deliverability of housing and will fail to address out-commuting and self-containment. There are also flooding and other constraints.
- Over-reliance on Weston – need for a more balanced approach across the district.
- Increase amount of growth at Weston.
- Increase the amount of housing allocated at Nailsea, Clevedon and Portishead – proposed allocations represent a significant reduction from recent levels.
- Nailsea and Yatton are appropriate for a large scale of growth.
- Increase provision within service villages – many have good range of facilities and are capable of accommodating additional growth. More flexibility needed in respect of the scale of development permitted.
- Increase provision in rural areas.

#### **CS15: Mixed and Balanced Communities**

- Not enough emphasis is placed on the ageing population and associated housing needs.
- Without providing for an appropriate level, and scale, of new development within the service villages it will not be possible to deliver mixed and balanced communities.
- It is not so clear how the policy aim can be achieved, particularly outside of Weston.

#### **CS16: Affordable Housing**

- Need to add reference to new tenure of Affordable Rent.
- Evidence is that affordable housing need is much higher than the proposed delivery.
- Delete reference to 'without the need for public subsidy' as this is no longer available or relevant.
- Policy is unclear in respect of contributions sought.
- 30% requirement will make most schemes unviable – need for flexibility, this should not be treated as a minimum.
- Need to define 'local needs'.



- Delete reference to contributions from sites of 5-9 dwellings – will restrict delivery.
- 82/18 tenure split is inflexible and doesn't reflect local variation.
- Must take account of employment-led in assessing viability.
- Consider different thresholds for different parts of the district.

### **CS17: Rural Exception Schemes**

- Settlements without settlement boundaries should not be excluded (such as Kingston Seymour).
- 100% affordable schemes are less likely in the future, so consider the need for cross-subsidy with market housing to make schemes viable.
- Parish councils shouldn't be given the power of veto, and the need for a site search is too onerous.
- Green Belt sites shouldn't be ruled out.
- 

### **CS18: Gypsies and Travellers and Travelling Showpeople**

- Gypsy sites should be allowed in the Green Belt under exceptional circumstances.
- The policy does not reflect the provision and delivery of gypsy sites in the post 2011 period as set out in the draft Regional Spatial Strategy.
- No more gypsy sites should be provided in the Congresbury/Hewish area.

### **CS19: Strategic Gaps**

- Land between Long Ashton and Bristol should be added as a location which is appropriate for possible designation as a strategic gap.
- The policy is vaguely worded, with no precise objective and inadequate justification. It lacks reasoning to explain why reliance on countryside policies alone would be unlikely to provide sufficient protection.
- If the detailed masterplanning of the Weston allocations is going to identify areas to be retained as being open, there is no need for a policy which seeks an aspiration to later designate land as a strategic gap.
- A degree of flexibility should be applied - the prevention of all types of development would be inappropriate and could be detrimental to the character of the land.
- The Key Diagram should show the broad position of the strategic gaps and not leave it for a subsequent DPD.

- The policy fails to meet the tests of soundness as it is not consistent with national planning policy, and should be deleted.

**CS20: Supporting a successful economy**

- Objection to the proposed Employment Investment Fund.
- Objection to the 1.5 jobs per home mechanism.
- Phased approach to the delivery of employment is flawed.
- Identify Yatton as location for additional employment land.
- Focus on Weston denies opportunities elsewhere.
- Policy is inconsistent with PPS4 objectives.
- No details of impact of revised levels of growth at Weston on M5 J21.
- Unclear how the employment-led strategy will/can be delivered.
- Policy does not recognise the benefits of tourism to the rural economy.
- Detrimental impact of employment-led strategy on delivery of housing.
- Unclear relationship between 1.5 jobs per home and amount of B class employment land allocated.
- 

**CS:21 Retail Hierarchy**

- Banwell should be identified as a local centre.
- The proposed Weston Villages centres should be identified as district centres.

**CS22: Tourism Strategy**

- There is no mention of Bristol Airport's role in the leisure and tourism industry.
- Suggesting that an over-concentration of holiday accommodation in small rural communities could create an adverse impact is unfair.

**CS23: Bristol Airport**

- Wording should clarify who decides what a 'satisfactory' resolution of environmental issues is.
- Wording and monitoring should be strengthened to specifically protect the natural environment.

- Wording and monitoring insufficient to protect local communities and major infrastructure development is required.
- No further increase in passenger numbers should be allowed if improvements not delivered in line with planning conditions.
- Bristol Airport should be required to reduce greenhouse gas emissions and the tourism deficit as a prerequisite of expansion.
- Policy lacks evidence on 'leakage'.
- Need to use latest forecasts which may mean development is unnecessary.
- Policy lacks a clear positive vision.
- No car parking should be allowed in the Green Belt.
- Details of the surface access strategy are required.

**CS24: Royal Portbury Dock**

- More supportive policy needed towards port and port rail network.

**CS25: Children, Young People and Higher Education**

No comments/objections

**CS26: Supporting healthy living and the provision of health care facilities**

- Sufficient consideration has not been given to the importance of the elderly being able to go into care close to their homes.
- New care homes should be welcomed and encouraged.
- No mention of the protection of communities from the activities related to Bristol Airport such as increased noise and increased traffic volumes which cause health and social damage.
- Policy does not differentiate between residential rehabilitation facilities (i.e. those open to clients who live outside North Somerset) and community rehabilitation facilities and services available only to North Somerset residents. The policy is founded on an evidence base which relates only to residential rehabilitation.
- Conflict between the needs of an ageing population and discouraging of speculative new care homes.

**CS27: Sport , Recreation and Community Facilities**

- Flexibility in the application of this policy is required to ensure that best design practice, site constraints and characteristics can be taken into account.

**CS28: Weston-super-Mare**

- Not enough housing allocated in the Weston urban area.
- Not enough evidence to demonstrate how the employment-led approach will be delivered.
- Development should be allowed east of the M5.
- Objection to prioritising development on brownfield land.
- Employment-led approach should be consistent for the whole of Weston – approach differs between Weston Villages and the town centre.
- Objections to 1.5 jobs per home – unrealistic and undeliverable.

**CS29: Weston-super-Mare Town Centre**

- Objection to reference that retail uses will not be appropriate in the gateway area.
- More flexibility wanted for mix of uses on the Sunnyside Road site.
- Employment-led approach should be consistent for the whole of Weston – approach differs between Weston Villages and the town centre.
- Policy fails to identify good public transport interchange sites at Weston-super-Mare rail station or Locking Road coach station.
- Policy does not give enough emphasis to the importance of residential development in the gateway area.

**CS30: Weston Villages**

- Objection to 1.5 jobs per home as not effective or deliverable.
- Sites not considered deliverable due to infrastructure requirements and employment-led strategy.
- Linking delivery of jobs to tranches of 250 dwellings is not practical or related to development economics.
- Object to A371 to Churchlands Way link.

- Sequential Test is required to be carried out ahead of flood mitigation measures.
- Consideration should be given to a new station on main line.
- No evidence of modelling on reduced numbers and impacts on transport network.
- No clear justification for 5,500 dwellings.
- No evidence for amount and distribution of employment.
- Policy not flexible enough.
- Policy is uncertain on local centre uses.
- Concern raised on infrastructure viability levels.
- Object to the priority given to brownfield elements as this does not reflect a co-ordinated masterplanning process.
- The strategic flood solution is not clearly defined.
- Focus on B class jobs is not in accord with PPS4.
- Strategic diagram should not fix the extent of the development area – need flexibility at the edges.
- Approach fails to recognise viability as an issue.
- Need a flexible approach towards renewable energy..

#### **CS31: Clevedon, Nailsea and Portishead**

- Nailsea and Yatton are appropriate locations for growth –and potential to use Green Belt.
- Each town should have its own area policy and cumulatively should provide 8,885 dwellings to reflect past completions.
- Portishead rail should not be opened for rapid transit.
- Towns should have individual policies which include a greater level of detail.
- Site allocations should be permissible adjacent to the towns in the same way as for service villages.

#### **CS32: Service Villages**

- Support more development at Easton-in-Gordano with development in the Green Belt.
- Yatton should be reclassified as a town in respect of the settlement hierarchy.
- Should not require sites to be brought forward through the Site Allocation Development Plan Document.
- Allowing sites outside settlement boundaries will put pressure on villages - clear guidelines needed as to in what

- circumstances this will be acceptable.
- Yatton, Congresbury, Backwell and Winscombe have scope for more development and can meet a higher housing requirement.
- 10 dwelling limit may be too restrictive –some redevelopment sites are larger than this.
- Re-open Long Ashton railway station.
- Policy is too inflexible and should allow for settlement boundary changes not just site allocations and development adjacent to settlement boundaries.
- Bleadon should be a service village.

### **CS33: Infill Villages**

- Inflexible not to allow development in the Green Belt or outside settlement boundaries.
- Rural areas contain a wide range of businesses etc with employees in need of housing - policy will not facilitate this, so vision cannot be realised.
- Should reopen rail stations at Flax Bourton, and Uphill to help sustainability.
- Affordable housing should be allowed at smaller villages.
- Not enough encouragement given to economic (tourism) development in rural areas.
- Cleeve should be a service village - needs housing to support local needs.
- Infill villages especially close to Weston can support more housing development than policy allows.
- Should keep existing village settlement boundaries as proposed approach is too restrictive.
- New employment development should be allowed in the Green Belt in accordance with PPG2.
- Policy should allow for larger housing schemes to come forward provided where they are community-led as long as no brownfield sites exist that could be used instead. Bleadon can accommodate more development.

### **CS34: Infrastructure Delivery and Development Contributions**

- Policy needs to be consistent with the draft Development Contributions SPD which stated contributions would not be sought from economic development.
- Specific reference should be made to green infrastructure.
- No reference to utilities in relation to infrastructure provision.

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