
Core Strategy Publication Version January 2011- Responses to Soundness Consultation

Where supporting information has been submitted a link is shown at "attached documents"

Section Introduction

Respondent Backwell Parish Council

Respondent Name	Backwell Parish Council
Comment ID	1013153/CSPV/1
Respondent Organisation	Backwell Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bath & North East Somerset Council (Beer)

Respondent Name	Bath & North East Somerset Council (Beer)
Comment ID	933601/CSPV/1
Respondent Organisation	Bath & North East Somerset Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bristol City Council

Respondent Name	Bristol City Council
Comment ID	1022305/CSPV/1
Respondent Organisation	Bristol City Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Church Commissioners for England

Respondent Name	Church Commissioners for England
Comment ID	1054657/CSPV/1
Respondent Organisation	Church Commissioners for England
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent David Glynn

Respondent Name	David Glynn
Comment ID	4209121/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>I have a fundamental objection to how the Core Strategy is now related to the Sustainable Community Strategy which, in my view, is both unsound and impacts on the Core Strategy's credibility. This is a fairly basic point. In the 'Introduction', under para 1.4, there is a reference to 'North Somerset Council's Sustainable Community Strategy 2008-2026'. There are similar references in paras 2.7 and 2.8 under 'Priority objectives'. The Core Strategy is then developed reflecting the shared priorities of the Sustainable Community Strategy (SCS), the understandable aim being to link the Core Strategy and the objectives of the SCS, see para 3.4. In fact, the Core Strategy document is written around four SCS themes, 'Living within environmental limits', 'Delivering strong and inclusive communities', 'Delivering a prosperous economy' and 'Ensuring safe and healthy communities'. On one level this appears to be an excellent approach, the difficulty being that North Somerset Council does not have a Sustainable Community Strategy and has never prepared one. The fact is that the North Somerset Sustainable Community Strategy was prepared and published by the North Somerset Partnership (NSP), which is not North Somerset Council. It should be noted that the word 'partnership' appears ten (10) times in the Core Strategy, with no reference anywhere to the 'North Somerset Partnership'. The last of these appears in the Glossary where the Sustainable Community Strategy is defined as: A document setting out the long-term vision for the area to tackle local needs. The SCS is prepared by the local strategic partnership. However, to suggest that the SCS is a North Somerset Council document or strategy is both misleading to readers and disregards the efforts of those of us who've freely given our time to the NS Partnership and its associated groups and activities, possibly including the NSC officers involved with the SCS. This is unacceptable. (attached document for full resp)</p>

Changes to be justified	The Core Strategy text must be changed to show the correct provenance of the Sustainable Community Strategy.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	David Glynn (33Kb)

Respondent Natural England

Respondent Name	Natural England
Comment ID	2862209/CSPV/2
Respondent Organisation	Natural England
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/28
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/1
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	As stated above we note the very serious housing affordability issues in the district and the previous low level of affordable housing provision in the district. However, we would like to see more of an analysis of the level of affordable housing need in the district and the average house price to wage ratio in this section to provide the appropriate context for the Core Strategy.
Changes to be effective	We would like to see more of an analysis of the level of affordable housing need in the district and the average house price to wage ratio in this section to provide the appropriate context for the Core Strategy.
Not consistent with national policy	
Changes to be consistent	
Attached documents	South West Housing Association RP Planning Consortium response.pdf (72Kb)

Respondent The Bristol Port Company

Respondent Name	The Bristol Port Company
Comment ID	1025793/CSPV/1
Respondent Organisation	The Bristol Port Company
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Core Strategy para 1.18 refers to the port being of regional importance. We would claim Bristol Port is of national importance and with the development of the proposed Deep Sea Container Terminal to be of international importance.
Changes to be justified	Amend para 1.18 to refer to Bristol Port as being of National Importance (possibly international if the deep sea container port is developed).
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Tim Baker

Respondent Name	Tim Baker
Comment ID	4203489/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The core strategy is not justified by the evidence presented to the SWRSS EiP, whose panel concluded that housing numbers should be 26,750 for the period to 2026. No evidence has been presented that would justify the the 13,400 housing number selected by elected members. The work by Mr Woodhead was based on political direction that he was given, that much is evident from the wording of his report. There was political decision to abandon the SW Bristol urban extension and growth in the higher level settlements, all of which will lead in the Council's own words to poorer people having to leave the district because they can't afford to live there because as the council say there is a free market for housing that is people can live where they want and a shortage of housing will always lead to the poor going. The core strategy is not the most appropriate strategy, the most appropriate strategy is the one that was tested at the SWRSS EiP and found to be the growth SW of Bristol and at WsM with limit growth in the higher order settlements. There is no evidence at all that the council have considered strategies other than the one they have published, minor changes format he previous version dealing with infill villages etc cannot be consider serious alternatives the N Somerset Core Strategy - publication version. The council should have tested a number of strategies against national and international policies, there is no evidence that was done.
Changes to be justified	
Not effective	The core strategy is not effective as is does not guarantee delivery of its, unsound, policies. The linkage of delivery to jobs in WsM is unrealistic and unenforceable in development control. It is not effective because it relies on the delivery of a handful of large

	sites, each of which has a long list of development constraints (access by public transport, flooding, utilities availability, contamination, etc) and any of which has a question mark over its viability without public sector grant aid, unlikely to be forthcoming, or without downgrading the S106 contributions to the point where the development no longer becomes sustainable.
Changes to be effective	
Not consistent with national policy	The core strategy is not consistent with national policy because it fails to meet the objectives and tests of PPS3, specifically; - paragraph 9, ...a decent home...in a community where they want to live... - paragraph 9,...to improve affordability across the housing market... (something the council state will not happen as a result of their core strategy. - paragraph 9,... to create sustainable, inclusive, mixed communities in all areas, both urban and rural (something that cannot happen if development is turned off in the majority of settlements) - paragraph 10,...a sufficient quantity of housing taking into account need and demand...(see comments immediately above) - paragraph 11,...market responsiveness - ...they should have regard to housing market areas...there is no evidence this has been done, in fact the evidence is that NSC have turned their back on Bristol, BaNES & S Gloucestershire. - paragraph 11,...evidence based policy - there is no evidence of the evidence base being shared with other LPAs, no evidence of a robust SHMA and the SHLAA process did not follow guidance. - paragraph 33,...take into account...evidence of current and future levels of need and demand...the governments latest household projections...a sustainability appraisal of the environmental, social and economic implications including costs, benefits and risks of development. - paragraph 34,...RSS should set out the level of housing provision...NSC have ignored this and cannot so the CS must be unsound.
Changes to be consistent	
Attached documents	Tim Baker (33Kb)

Section Visions and Objectives

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/5
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The new development at Ashton Park will form part of the strategic plan for NS and be a significant settlement delivering high quality decent homes in NS. The CS should provide a Vision statement for this new development which will inspire and provide confidence towards the new scheme. The scale of the planned growth upto 2026 and beyond is such that it warrants a key Vision statement alongside those of WsM and the 3 Towns. The masterplanning of this project involved several stakeholder work shops which were managed in association with the Council and their consultants Broadway Malan. Their report entitled 'Masterplan for South West Bristol Urban Extension' should be read alongside this submission and can be found on the Council's web site. The source of the Vision Statement was a series of stakeholder events. See attaced document for full response.
Changes to be justified	Substitute existing Vision 6 with Ashton Park Vision "To create a characterful, evolving community that inspires pride and a sense of safety; that has healthy links to both urban and rural contexts, is integrated with an infrastructure that supports and encourages sustainable living, and is set in a web of multi-functional green areas, making the most of the quality of the setting." Renumber existing vision 6 and 7.
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	Ashton Park response - new vision.doc (66Kb)

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/21
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Vision 1 needs to be amended to take account of the proposed settlement at Ashton Park for the reasons set out in our other representations .
Changes to be justified	Amend the wording to provide a new 3rd paragraph about Ashton Park . as follows: " Ashton Park on the south west edge of Bristol will be established as a new sustainable community as part of an extension to the city of Bristol in North Somerset. New development areas will be established, creating mixed-use communities with a distinct sense of place valued for their high standards of sustainability, quality of life and inspired design".
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Barrow Gurney Parish Council

Respondent Name	Barrow Gurney Parish Council
Comment ID	4618561/CSPV/5
Respondent Organisation	Barrow Gurney Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The Core Strategy albeit sound in principle may be rendered ineffective by lack of sufficient funding to meet the reasonable needs of communities, who are already suffering unacceptable conditions.

Changes to be effective	In order for Vision 1 to be compatible with Vision 7 there is a fundamental need in the planning of Bristol Airport to agree with the affected communities and control the impacts caused on those who live nearby and on the natural environment.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Barrow Gurney Parish Council letter CS10 and others (34Kb) Barrow Gurney Parish Council Rep CS10 and others (63Kb)

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/1
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Vision is not considered to be justified due to how the housing numbers have been derived and then distributed. Fundamentally the Visions do not reference the need to meet the housing requirements of the District to 2026 based on the Household Projections published by CLG. Similarly the Visions for Clevedon, Nailsea and Portishead (Visions 3-5) are identified

	as playing less of a Dormitory role as a local service centre. However these settlements clearly have a greater role to play and should also be a focus for development. We also submit that Yatton should be identified alongside Clevedon, Nailsea and Portishead due to its range of services. On this basis Yatton should be identified as being a suitable location to assist in meeting the housing and employment needs of the rest of the District to 2026, rather than a service village.
Changes to be justified	The deletion of Policy CS13 and it's rewriting on the basis on the need for a minimum of 22,780 homes being provided up to 2026, or the requirement of 36,000 identified in 2008 Household projections. Through this approach the Core Strategy will reflect the guidance set out in PPS 1 and PPS 3 and ensure a sustainable and balanced distribution of housing development, providing for the whole needs of the District. CS14 should be revised to include: The delivery of up to 1,000 dwellings within and adjoining Yatton in the period 2010-2026 within the remainder of the District
Not effective	
Changes to be effective	
Not consistent with national policy	The Vision is not considered to be justified due to how the housing numbers have been derived and then distributed. Fundamentally the Visions do not reference the need to meet the housing requirements of the District to 2026 based on the Household Projections published by CLG. Similarly the Visions for Clevedon, Nailsea and Portishead (Visions 3-5) are identified as playing less of a Dormitory role as a local service centre. However these settlements clearly have a greater role to play and should also be a focus for development. We also submit that Yatton should be identified alongside Clevedon, Nailsea and Portishead due to its range of services. On this basis Yatton should be identified as being a suitable location to assist in meeting the housing and employment needs of the rest of the District to 2026, rather than a service village.
Changes to be consistent	Visions 1-6 should be modified to reflect the household projections and to ensure conformity with PPS1, PPS 3 and PPS7. Yatton should also be identified under Policy CS31 as a suitable location for additional housing, employment and other development due to its range of services, employment, recreation facilities and accessibility by modes of travel other than the private car - particularly by rail.
Attached documents	Bloor response Visions.doc (24Kb) Bloor response CS13.docx (23Kb) Bloor response CS14.docx (22Kb)

Respondent LandTrust Developments Ltd

Respondent Name	LandTrust Developments Ltd
Comment ID	3620513/CSPV/1
Respondent Organisation	Baker Associates
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Vision 1 Objection is made to the whole spatial strategy because it is not justified. The spatial strategy, articulated in the visions, objectives and numerous policies is not based on evidence or a robust understanding of the needs of North Somerset and how it works as a place in terms of its role and relationship as part of the West of England functional area. PLEASE SEE ATTACHED STATEMENT FOR FULL REASONS
Changes to be justified	The Core Strategy should make provision for the delivery of the appropriate scale and location of development to meet the needs of the West of England functional area. It should also ensure that North Somerset contributes to the achievement of the LEP objectives and provides for adequate housing through an urban extension as close to Bristol as possible. Changes are required to the strategy as well as the policies on green belt, scale and location of development PLEASE SEE ATTACHED STATEMENT FOR FULL CHANGES
Not effective	The spatial strategy, vision, objectives and policies set out are not effective because they are over-dependent on one location and type of site which have considerable constraints. As a consequence it is unlikely they will be delivered, they do not provide adequate flexibility and there are inadequate monitoring provisions. PLEASE SEE ATTACHED STATEMENT FOR FULL REASONS

Changes to be effective	The whole spatial strategy needs to be revised, and with it the vision, objectives and policies. In particular it is necessary to acknowledge the relationship with Bristol and the West of England functional area and make changes as necessary to policies on the green belt, scale and location of development. PLEASE SEE ATTACHED STATEMENT FOR FULL CHANGES
Not consistent with national policy	The spatial Strategy, visions, objectives and policies are unsound because they are inconsistent with national policy set out in PPS12 and PPS3. They conflict with RPG10 and the emerging RSS and also do not set housing requirement in line with national guidance. PLEASE SEE ATTACHED STATEMENT
Changes to be consistent	The Core Strategy should revised its housing figures to take account of the robust methodology set out in national policy. It should also deliver on the objectives set out in the development plan (RPG10)and emerging RSS. This means developing the most appropriate strategy which means reviewing the green belt and including a strategic allocations policy within the document. PLEASE SEE ATTACHED STATEMENT
Attached documents	LandTrust response by Baker Associates.pdf (1.3Mb)

Respondent Mr D Breeze

Respondent Name	Mr D Breeze
Comment ID	3320065/CSPV/1
Respondent Organisation	CMH Management Limited
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	<p>We believe that the Core Strategy (CS) is unsound as the evidence base which underpins the CS dismisses without credible explanation, the conclusions of a nationally reputable source, Oxford Economics report of June 2010, who projected that some 17,000 jobs (Central forecast) will be created over the plan period. The Council concede that these growth trajectories are consistent with the long term trends experienced in North Somerset over the longer term, as stated in paragraph 7.3 of the 'Stage 2 Report', however it makes an unexplained quantum leap from its conclusions in paragraph 7.3 of the 'Stage 2 Report' to the 'Modified' growth projections. There is no evidence base for this reduction other than a concern that job creation seemed 'optimistic' and the Council simply stating that these higher growth projections, "contrasted to some degree with anecdotal evidence regarding recent local economic growth and future prospects." (para 7.4, 'Stage 2 Report') To reduce the employment growth projections by over 40% because the independent evidence didn't seem to fit with local anecdotes, and to assume that the impact of the recession will last for the remainder of the plan period therefore assuming that fewer jobs will be created over this period, seems completely flawed.</p>
Changes to be justified	<p>The evidential base set out in the Stage 1 and Stage 2 reports needs to take a far more realistic approach to future job creation in the District as modelled by Oxford Economics, and the Council need to adequately explain why they chose to modify the projections and largely discard the past 5 years work undertaken on the RSS. We consider that no credible justification has been given and we consider that the 19,400 Central projection be used as the employment growth target for the District over the period.</p>
Not effective	<p>We consider the Core Strategy to be unsound as it is underpinned by a complete over reliance on the deliverability of major development at Weston in assuming that 6,000 dwellings will be developed there. This almost complete reliance on one settlement fails to address the local needs of any other settlements and unreasonably restricts local peoples choice of housing and movement to the detriment of key workers and local smaller settlements. By distributing all the housing numbers in Weston, housing delivery is being risked on a single strategy which due to a very weak local housing market will fail to deliver the numbers anticipated, leading to greater affordable housing shortages, and increased house price inflation. Furthermore and notwithstanding the stage in the planning process these schemes have reached this strategy places far too much reliance on the delivery of two major projects. Such projects are often led by a small list of developers who will develop at rates to suit their corporate objectives and markets, and not the housing needs of an entire District/ sub region. Such projects are by their very nature complex and very expensive to bring to fruition and as such are often typified by long development lead in periods, slower rates of delivery, and variable to poor development and design quality e.g. Worle, Locking Castle, Ebdon Grounds. It is however very clear from the 'Development</p>

	Contributions SPD' why the Council are focusing such large scale growth on two sites less than half a mile apart when one studies the level of contributions being sought from these developments.
Changes to be effective	We consider that the Council should disperse a greater proportion of the overall housing requirement to the smaller settlements, including the infill settlements, in order to meet local housing needs which are more acute in the rural villages. We accept the primacy of the major settlements but to underpin the entire housing market on one settlement is in our opinion a high risk strategy and one that is fundamentally flawed.
Not consistent with national policy	The Core Strategy fails to conform with national policy set out in PPS3 and RPG10 and the emerging Regional Spatial Strategy (RSS). We believe that the Core Strategy dismisses the past 5 years work which has been undertaken on the emerging Regional Spatial Strategy (RSS). On November 10th 2010 Mr Justice Sales ruled in the High Court that the Government had acted unlawfully in not putting any transitional arrangements for planning in place, effectively reinstating the RSS as a material consideration. We believe that should the Council take forward the Core Strategy based on the significantly lower housing requirements it proposes it will clearly not be in conformity with the RSS, a document which we have no idea of knowing how long will be in existence.
Changes to be consistent	Housing numbers should not be set based on the "localism " approach, which underpins this methodology of a local employment based growth strategy but must follow the guidelines set out in national guidance. We believe that the Core Strategy should as part of this process review the Green Belt boundaries particularly in relation to the infill villages which are washed over with green belt, as we consider this limits growth to the detriment of meeting local housing needs.
Attached documents	

Respondent Natural England

Respondent Name	Natural England
Comment ID	2862209/CSPV/1
Respondent Organisation	Natural England

Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/1
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	

Changes to be justified	
Not effective	The vision is not effective. We support the Vision for Weston-super-Mare and in particular the creation of mixed-use communities. In our view that requires uses within mixed-use development areas to be phased, so that there is a balance of uses, rather than an overriding requirement to provide employment first. It is also important that the Core Strategy enables appropriate development to take place at Clevedon, Nailsea and Portishead, so that they can indeed support their local populations and play less of a dormitory role.
Changes to be effective	In our view that requires uses within mixed-use development areas to be phased, so that there is a balance of uses, rather than an overriding requirement to provide employment first. It is also important that the Core Strategy enables appropriate development to take place at Clevedon, Nailsea and Portishead, so that they can indeed support their local populations and play less of a dormitory role.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/1
Respondent Organisation	Portbury Parish Council

Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/2
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We note that the vision does not include any reference to meeting housing need and addressing affordable housing issues in the district. Given the likely level of affordable housing to come forward we are presuming that the Council acknowledges that it will not be possible to achieve either of these goals.
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent The Bristol Port Company

Respondent Name	The Bristol Port Company
Comment ID	1025793/CSPV/2
Respondent Organisation	The Bristol Port Company
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Volaw Corporate Trustees (Wyg Planning & Design)

Respondent Name	Volaw Corporate Trustees (Wyg Planning & Design)
Comment ID	3322817/CSPV/1
Respondent Organisation	Wyg Planning & Design
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	The Volaw Corporate Trustees and Volaw Trustees (112Kb)

Section Vis 2**Respondent** Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/6

Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Vision 2 needs to be amended to be more explicit that the task is to have redressed the imbalance between homes and jobs at WsM by the end of the plan period (2026) , not just 'redressing the imbalance', which could mean anything . The objective of rebalancing must have regard to a base date , probably 2001 which has its justification in RPG 10.
Changes to be justified	Amend the wording in the 2nd para as follows: By 2026 an employment-led development strategy will have achieved a strong and diverse economic profile in Weston-super-Mare with an improved range, quantity and quality of local employment opportunities which will have redressed the imbalance between employment and homes reducing dependency on out-commuting by car for work and improving self containment and sustainable living.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/1
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mr D Breeze

Respondent Name	Mr D Breeze
Comment ID	3320065/CSPV/2
Respondent Organisation	CMH Management Limited
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	The Employment growth projections are unsound and without adequate explanation or justification. In respect of Weston it seems a paradox in the Core Strategy that the lack of local employment opportunities is being used to justify the 'easy to find' large scale housing sites yet in the remainder of the settlements in the strategy it is the lack of employment that is being used to justify no housing allocations?
Changes to be justified	The Core Strategy must address the needs of the district and not simply Weston and as such the housing requirement should be dispersed to a greater extent to meet the local needs of the smaller settlements including the infill villages such as Cleeve.
Not effective	Weston Super Mare's entire future growth is dependant upon the delivery of two heavily constrained and commercially marginal projects. The Core Strategy places far too much reliance on the delivery of these two major projects. Such projects are often led by a small list of developers who will develop at rates to suit their corporate objectives and markets, and not the housing needs of an entire District/ sub region. Such projects are by their very nature complex and very expensive to bring to fruition and as such are often typified by long development lead in periods, slower rates of delivery, and variable to poor development and design quality e.g. Worle, Locking Castle, Ebdon Grounds. It is however very clear from the 'Development Contributions SPD' why the Council are focusing such large scale growth on two sites less than half a mile apart when one studies the level of contributions being sought from these developments.
Changes to be effective	A strategy based on greater dispersal of housing growth would carry less risk for growth delivery and would be more flexible and responsive to changes over the plan period.
Not consistent with national policy	The Core Strategy is not consistent with national policy as detailed in PPS3 and RPG 10, and as set out in our response to Vision 1 the CS fails to conform with any of the objectives of the emerging RSS the life span of which may well extend for some time.
Changes to be consistent	The Core Strategy should adhere with national guidance for setting housing numbers and should have regard to the objectives of the emerging RSS.

Attached documents

Respondent Mr and Mrs P Moss

Respondent Name	Mr and Mrs P Moss
Comment ID	3556961/CSPV/1
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The text erroneously refers to brown field land being the focus of the delivery of the two new communities. In the instance of Parklands Village, at least 50% of the land included in the proposed development area comprises land which has not previously been developed (agricultural land). This gives the impression that development is to be confined ('focused') to that part of the site which has been previously developed. We do not believe that this is the intention of the planning authority, and that the whole area is to be developed in a planned, but comprehensive, fashion including built development on agricultural land.
Changes to be justified	Amend text to make it clear that, at Parklands Village, built development will take place on land which has not previously been developed within and, where appropriate, adjoining the designated development area.
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/2
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No

Not justified	
Changes to be justified	
Not effective	The Vision is not effective. Persimmon Homes are actively supporting the Council's vision to increase employment opportunities in Weston-super-Mare and reduce dependency on out commuting, by bringing forward a high quality business park in advance of residential development at Weston Airfield as part of the Core Strategy Weston Villages proposal. However, it has to be recognised that in the context of the Bristol sub-region, Weston-super-Mare functions as part of a coherent sub-region, where employment opportunities exist in Bristol and in South Gloucestershire which serve housing in North Somerset. It is fundamental in the way the Bristol sub-region operates. Therefore, whilst it is right to provide opportunities for greater self-containment, it will only have a relatively small impact. Opportunities to improve transport links between Weston and employment in Bristol and South Gloucestershire also need to be encouraged to address the needs of those who currently require them and will continue to do so, irrespective of how much new employment is provided in Weston.
Changes to be effective	Whilst it is right to provide opportunities for greater self-containment, it will only have a relatively small impact. Opportunities to improve transport links between Weston and employment in Bristol and South Gloucestershire also need to be encouraged to address the needs of those who currently require them and will continue to do so, irrespective of how much new employment is provided in Weston.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section Vis 3

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/3
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	<p>The Vision is not effective. Persimmon support the Vision to allow more opportunities for residents to work locally, but as with Weston, it has to be accepted that Clevedon operates as an integral part of the Bristol sub-region and the majority of employment opportunities are located in Bristol and South Gloucestershire. The Vision for Clevedon (unlike Weston-super-Mare) quite rightly recognises this and says "increasing numbers who work outside the town, will make the journey by public transport, cycle or shared car journey". It is not clear how the Core Strategy delivers this. Firstly, opportunities to increase journey to work by cycle outside Clevedon are extremely limited. Public transport improvements are limited to road and bus provision. The Vision for Clevedon also does not address the increasing elderly population of the town. There has been little new residential development in</p>

	the town in the last 30 years to provide opportunities for first time buyers and new residents to contribute towards a more balanced age structure.
Changes to be effective	-
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section Vis 4

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/7
Respondent Organisation	Ashton Park Limited

Do you consider this part of the Core Strategy to be sound?	No
Not justified	Vision 4 needs to be amended so that its is clearer that the priority in Nailsea is to rebalance employment v new homes to reduce outcommuting . There is no evidence that there is a need to focus new development on local housing need or that there is any mechanism to deliver a more balanced age structure through such provision. The settlement acts as a dormitory town and this needs to be reduced by avoiding new housing development until new employment opportunities are delivered. The Vision will be unsound without the amended wording as it will perpetuate outcommuting and unsustainable patterns of growth.
Changes to be justified	Amend the wording to Vision 4 by the deletion of part of the 1st sentence in the 3 rd paragraph as follows : New development will be focused on addressing local housing need to encourage a more balanced age structure and supporting economic growth. There will be an emphasis on encouraging further job opportunities through new businesses or supporting our companies to grow and making provision for space to relocate. Accessibility to Bristol and Weston-super-Mare will be improved through a better choice of transport modes.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents

Respondent Crest Nicholson Plc

Respondent Name	Crest Nicholson Plc
Comment ID	4602465/CSPV/2
Respondent Organisation	Crest Strategic Projects Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	Nalisea is located on the railway with direct connection to Bristol. It should be a sustainable location for growth, albeit not necessarily large scale. However the Core Strategy restricts growth at this settlement completely.
Changes to be effective	The vision should acknowledge the sustainability of the settlement in respect of its location close to Bristol and with good rail connections and acknowledge that this would allow for limited growth of the settlement.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/4
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	This Vision is not effective. Persimmon considers the Vision for Nailsea to focus new development on addressing local housing need is too limited. It is not clear how the Core Strategy will even deliver this very limited Vision, given the lack of development opportunities within the town. The Vision also says accessibility to Bristol and Weston-super-Mare will be improved through a better choice of transport modes. In fact, the choice of transport modes from Nailsea is good and it is not a better choice that is required, but rather to make existing choices work better, particularly the railway service to both Bristol and Weston-super-Mare.
Changes to be effective	-
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Volaw Corporate Trustees (Wyg Planning & Design)

Respondent Name	Volaw Corporate Trustees (Wyg Planning & Design)
Comment ID	3322817/CSPV/2
Respondent Organisation	Wyg Planning & Design
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section Vis 5

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/1
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	FOSBR (Friends of Suburban Bristol Railways) strongly supports the reinstatement of passenger services on the railway line from Portishead to Bristol. We are, however, dismayed to read that a rapid transit link is being considered as an alternative. In our view, a rapid transit link will not be effective in delivering modal shift because it will be subject to the same congestion on the A369 as the current bus service. Furthermore, any use of the rail trackbed for bus rapid transit would make it more difficult to reinstate the railway in future.
Changes to be effective	We suggest the words "or rapid transit" are deleted from the second paragraph of VIS 5; or, at least, that the second sentence of paragraph is redrafted to make it clear that the heavy rail link is the authority's preferred option.
Not consistent	

with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/5
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The Vision is not effective. As with other towns, Persimmon would wish to emphasise the role of Portishead as part of the Bristol sub-region where the links between Bristol and Portishead are particularly strong. Therefore, we support the provision of a rail or

	rapid transport link to Bristol. However, we do not support the emphasis on consolidation. It is clear that in demographic terms, by 2026, residents who moved into new homes in the new development areas in 1999, will themselves be creating demands for new housing. If greater self-containment is to be realised, those people will need to be housed in Portishead. As the Vision does not recognise this, the Core Strategy does not address it and we consider that to be a major omission.
Changes to be effective	-
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/2
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section Vis 6

Respondent Persimmon Homes Severn Valley

Respondent Name	Persimmon Homes Severn Valley
Comment ID	3361153/CSPV/1
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	

Changes to be justified	
Not effective	Our clients support the overall vision of service villages becoming 'thriving rural communities and a focal point for local housing needs, services and community facilities'. The Core Strategy as currently written, however, does not provide the platform for Vision 6 to be effectively delivered. If the service villages are to grow in a sustainable way and become thriving rural communities, the Core Strategy must include policies that encourage appropriate development capable of enabling wider benefits to the local community. This is also a vital part of service villages becoming more self-contained. This issue is addressed in more detail under the appropriate policy headings.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/6

Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The Vision is not effective. We support the Vision that service villages should be a focal point for local housing needs. We doubt that provision of purely local housing needs will enable the service villages to become more self-contained. What is important is that the service villages continue to perform that role, that this is monitored and that action is taken to address any issues that arise.
Changes to be effective	-
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section Vis 7

Respondent Martyn Leisure

Respondent Name	Martyn Leisure
Comment ID	3583521/CSPV/1
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	On behalf of our client, Martyn Leisure, we object to the wording presented in this Vision. It is important that businesses and enterprises which are situated or based in rural areas are recognised and this is reflected in the Vision. To confirm that any new development can only be small scale is presumptuous and fails to recognise and appreciate opportunities for new development which might be of a greater scale, perhaps as regeneration proposals. No evidence has been presented substantiating the Council's position. The Vision should be redrafted.
Changes to be justified	Martyn Leisure requests that this Vision be redrafted as follows: "Rural Areas will enhance their countryside character. Where the quality of the natural environment is the prime objective and any new development will be of (delete:small) an appropriate scale and strictly controlled. The infill villages and neighbouring areas will have maintained or enhanced their individual character, identity and sense of community. Accessibility will be improved to facilities and services not locally available within nearby larger settlements. New development in surrounding countryside will seek to retain its (Delete:open) natural character; its distinctive landscapes protected from inappropriate development; and agricultural use supported and valued for its biodiversity."
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mr D Breeze

Respondent Name	Mr D Breeze
Comment ID	3320065/CSPV/3
Respondent Organisation	CMH Management Limited
Do you consider this part of the Core Strategy to be sound?	No

Not justified	We believe that no clear rationale has been applied to determine which villages form Service villages and which form Infill villages and we believe that the identification of Cleeve as an infill village has been arbitrarily arrived at without a proper up to date housing needs assessment to establish and understand the current levels of local housing need in the village.
Changes to be justified	As we have previously argued in our representations to the Core Strategy Consultation draft we believe that Cleeve should be redefined as a Service Village. Our reasons for this are; Â· Following a Housing Needs Survey of Cleeve undertaken by the Parish Council and the Rural Housing Enabler in 2004, The Rural Housing Trust identified 29 households could not satisfy their housing needs in the open market and concluded that "a local needs housing scheme of say 10-12 properties with a mix of 2 and 3 bedroom dwellings would go some way towards meeting this need" Given that this survey is historic we believe that this situation will have only deteriorated and the shortage of affordable dwellings in the village is severely impacting upon local people who are unable to compete in the general open market, leading to greater social inequality. Â· We believe that Cleeve is a sustainable village with a good level of local facilities. However due to the absence of local employment opportunities and decent affordable housing the village suffers from a dormitory character. Limited local growth in the form of a local mixed-use development will create much needed employment opportunities for local people and will assist in meeting local housing needs. Â· We believe that 'Small scale residential or mixed use allocations adjacent to settlement boundaries provided they are community led and demonstrate clear local benefits' should be permitted to meet the needs of the local community. We believe that such development can be accommodated within the village without having any adverse impact on the overall character and openness of the village.
Not effective	The Core Strategy fails to deliver any growth to meet local housing needs which in itself will lead to more migration and a deterioration of local services and employment. This document is unsound as it fails to be flexible in the event that the growth strategy fails at Weston and we believe that limited employment led growth in Cleeve would assist local businesses and help sustain local services.
Changes to be effective	Cleeve should be raised to the category of a Service Village, and a limited amount of growth should be identified to offset high risk delivery shortfalls at Weston.
Not consistent with national policy	The Councils Spatial Strategy which relies on the allocation of the major sites at Weston to the detriment of any other settlement is unsound as it fails to follow the accepted practice for the preparation of development plans/ LDF's as set out in national guidance. As we have stated in other responses the Councils disregard for the enormous amount of robust work undertaken on the emerging RSS is also fundamentally unsound as little or no rationale or justification is presented by the Council for disregarding this work.

Changes to be consistent	The Core Strategy should be consistent with national guidance which calls on LDF's to identify allocations and justify and review the merits of each in turn.
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/3
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section Ob

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/8
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Priority Objectives set out on page 20 are not sound and need amendment for the following reasons: 1. They fail to make reference to the new settlement at Ashton Park – insert a new priority Ashton Park 2. Change the priority so that Priority 4 is now priority 1. The key objective that requires a concerted effort from this Council is the rebalancing of the jobs/ homes ratio at WsM and the 3 Towns through the prioritising of employment growth and if necessary the limiting of residential growth until such time as employment catches up, amend the wording of 4. to achieve this objective, including addressing the backlog. Provide a suitable employment target for the whole plan period so that it is robust and effective – thereby sound. 3. Increase the level of housing delivery across NS from 13400 to atleast 16400 and perhaps higher. See evidence from BA App2. 4. Delete reference to junction improvements to M5 as this will only increase the capacity for out commuting and unsustainable patterns of growth. Insert the South Bristol Link Road as this is vital to support regeneration of South Bristol, Airport Access and relieve major congestion in Bristol and consequential air quality issues. 5. Reference to making provision for the ageing population is supported but there is no policy provision for this in the CS. 6. Amend the wording to the Green Belt objective to take account of the new settlement at Ashton Park and the key role of the strategic gaps to protect the setting of settlements as shown on the Key and Inset Diagrams.
Changes to be justified	1. Prioritise employment growth throughout North Somerset to support greater self- containment, and a ADD: rebalancing of jobs v new homes, in particular by ensuring that in Weston-super-Mare ADD: employment growth is delivered well ahead of housing

	<p>development (DELETE: is delivered in step with employment growth), brownfield opportunities in Clevedon, Nailsea and Portishead are maximised... 2.Deliver sustainable housing development across North Somerset to meet housing needs, through the provision of a minimum of 16400 new homes by 2026. 3 Ensure that major development proposals are delivered in tandem with the necessary improvements in physical and social infrastructure such as flood mitigation, healthcare facilities , ADD: South Bristol Link Road , The Rapid Transit at Ashton Vale , (DELETE: M5 junction 21 improvements at Weston-super- Mare, junction 19 improvements at Portishead) and access improvements to Bristol Airport, and that appropriate delivery mechanisms including effective tariffs/ developer contributions are in place. 4. Make provision for the needs of an ageing population, prioritising supported living as opposed to residential care. 5.... See attached document for full suggested amendments.</p>
Not effective	<p>The Priority Objectives set out on page 20 are not sound and need amendment for the following reasons: 1. They fail to make reference to the new settlement at Ashton Park...insert a new priority Ashton Park 2. Change the priority so that Priority 4 is now priority 1 . The key objective that requires a concerted effort from this Council is the rebalancing of the jobs/ homes ratio at WsM and the 3 Towns through the prioritising of employment growth and if necessary the limiting of residential growth until such time as employment catches up, amend the wording of 4. to achieve this objective, including addressing the backlog. Provide a suitable employment target for the whole plan period so that it is robust and effective & thereby sound. 3. Increase the level of housing delivery across NS from 13400 to at least 16400 and perhaps higher. **see evidence from BA App2. 4. Delete reference to junction improvements to M5 as this will only increase the capacity for out commuting and unsustainable patterns of growth . Insert the South Bristol Link Road as this is vital to support regeneration of South Bristol, Airport Access and relieve major congestion in Bristol and consequential air quality issues. 5. Reference to making provision for the ageing population is supported but there is no policy provision for this in the CS. 6. Amend the wording to the Green Belt objective to take account of the new settlement at Ashton Park and the key role of the strategic gaps to protect the setting of settlements as shown on the Key and Inset Diagrams.</p>
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	Ashton Park response Priority Objectives.doc (99Kb)

Respondent Avon and Somerset Constabulary

Respondent Name	Avon and Somerset Constabulary
Comment ID	1046721/CSPV/1
Respondent Organisation	Avon and Somerset Constabulary
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Objective 8, particularly, the Core Strategy approach (page 102) do not distinguish between 'residential' and 'community' treatment/rehabilitation and are founded on an evidence base which relates only to residential rehabilitation. In my view, the Core Strategy should make a clear distinction between 'residential' treatment provision and 'community' treatment provision. Residential rehabilitation services are private businesses which accept referrals from all over the UK and sometimes overseas. There are 289 beds within North Somerset premises which are linked to drug/alcohol treatment or support. Of these, 191 beds are within the 12 registered residential rehabilitation facilities which are regulated by the Care Quality Commission. Only a small proportion of this provision is utilised for placements from North Somerset Community Safety and Drug Action Team or Social Services. There are approximately 20 of these 'local' placements per annum. This supports the Core Strategy conclusion that there are 'more than

	<p>enough of these services to meet the needs of the existing population'. In contrast, Community Drug Treatment Services are commissioned by the Community Safety Drug Action Team on behalf of the North Somerset Safer and Stronger Partnership Joint Commissioning Group (which I chair). These services are for North Somerset residents only. In 2009/10 these commissioned community services treated approximately 900 drug clients and 300 alcohol clients. The Safer & Stronger Partnership undertakes an annual assessment which identifies need, including unmet need to guide our commissioning decisions. The 2011/12 needs assessment includes prevalence estimates and referrals data which indicates an unmet need in North Somerset. I can advise you that the evidence base for community treatment does not therefore correlate with the Core Strategy conclusion "that there is more than adequate provision for the needs of the existing population".</p>
Changes to be justified	<p>I would therefore suggest that the word 'residential' be included in objective 8 to ensure that the policy is applied only to residential provision for 'out of area' clients. The statements in their current form could impact on the provision of (non-residential) community services for local people with drug and alcohol treatment needs which would only serve to create greater inequalities, not reduce them.</p>
Not effective	<p>The Core Strategy objective 8 appears not to meet the effectiveness test as it does not allow sufficient flexibility to meet the current and future health needs of North Somerset residents. This is because the statement does not reflect the evidence base in relation to local (non-residential) community treatment needs. This would be contrary to the overall aim to reduce health inequalities.</p>
Changes to be effective	<p>I would therefore suggest that the word 'residential' be included in objective 8 to ensure that the policy is applied only to residential provision for 'out of area' clients. The statements in their current form could impact on the provision of (non-residential) community services for local people with drug and alcohol treatment needs which would only serve to create greater inequalities, not reduce them.</p>
Not consistent with national policy	<p>Objective 8 not consistent with national policy as set out in the following national strategies: · Healthy Lives, Healthy People: Our strategy for public health in England (2010). This document sets out the Government's approach to tackling health inequalities including drug and alcohol misuse and emphasises the future lead role of Local Authorities in delivering the public health agenda. This national strategy states "Public health professionals will work locally to prevent people from taking harmful drugs, to reduce the drug use of those already taking drugs and to help people to be drug free, recover fully and contribute to society". The current Core Strategy approach would not be consistent with this as it would not allow for the development of treatment provision to achieve these outcomes locally. · Similarly, the above Core Strategy extracts are not consistent with the National Drug Strategy (2010): reducing demand, restricting supply, building recovery. This strategy sets out the Government's approach to building</p>

	recovery in communities (page 18): "We must therefore put the individual at the heart of any recovery system and commission a range of services at the local level to provide tailored packages of care and support. This means that local services must take account of the diverse needs of their community when commissioning services" The current Core Strategy approach would inhibit the development and commissioning of services to meet local needs. Community based services should be allowed to develop in the same way as other health services to meet local need. · A New Approach To Fighting Crime (Home Office 2011). This document sets out over-arching Government policy in respect of community safety. It includes a focus on 'getting to grips' with the causes of crime including drug and alcohol dependency. This is also at the heart of the National Reducing Re-Offending Strategy (2010) and the national guidance on Integrated Offender Management.
Changes to be consistent	I would therefore suggest that the word 'residential' be included in objective 8 to ensure that the policy is applied only to residential provision for 'out of area' clients. The statements in their current form could impact on the provision of (non-residential) community services for local people with drug and alcohol treatment needs which would only serve to create greater inequalities, not reduce them.
Attached documents	Avon and Somerset Constabulary (41Kb)

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/2
Respondent Organisation	Bloor Homes
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	The Vision is not considered to be justified due to how the housing numbers have been derived and then distributed. Policy CS13 identifies the general housing requirements of the District to 2026, setting out that land will be identified to deliver a minimum of 13,400 new dwellings in the authority. This figure is not consistent with paragraph 10 of PPS3 because it does not take account of the identified need in either the Household Projections 2006 or 2008. Furthermore, the household projections show a trend of increasing demand for households, with the 2006 projections identifying a need for 33,000 new households, whilst the 2008 projections identify a need for an additional 36,000 new households, an increase of nearly 10%. The increase in North Somerset is set against a backdrop of 20,500 fewer households per year being formed in England between 2008 and 2031.
Changes to be justified	The deletion of Policy CS13 and it's rewriting on the basis on the need for a minimum of 22,780 homes being provided up to 2026, or the requirement of 36,000 identified in 2008 Household projections. Through this approach the Core Strategy will reflect the guidance set out in PPS 1 and PPS 3 and ensure a sustainable and balanced distribution of housing development, providing for the whole needs of the District.
Not effective	The overall Vision for North Somerset is not considered to be deliverable, with such a low level of housing proposed.
Changes to be effective	Increase the housing number as set out in the representation to Policy CS13 Scale of New Housing.
Not consistent with national policy	We object to a number of the priority objectives, including Objective 1 which refers to providing a minimum of 13,400 new homes in the authority by 2026. This level of housing is considered to be far too low and it should be based on the Household Projections. By not basing housing need on the Household Projections 2008, the Core Strategy is not compliant with paragraph 33 of PPS1. Objective 5 refers to an employment led strategy at Weston-super-Mare but it also needs to refer to the role of housing in regenerating and revitalising the town. Objective 6 also needs to refer to Yatton due to the town hosting the same attributes as Clevedon, Nailsea and Portishead.
Changes to be consistent	Priority Objective 1 should be modified to reflect the household projections and to ensure conformity with PPS1, PPS 3 and PPS7. Yatton should also be identified under Priority Objectives 6 and 9 as a suitable location for additional housing, employment and other development due to its range of services, employment, recreation facilities and accessibility by modes of travel other than the private car - particularly by rail.

Attached documents	Bloor response CS13.docx (23Kb) Bloor response CS14.docx (22Kb)
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Respondent Bristol Water plc - Turley Associates

Respondent Name	Bristol Water plc - Turley Associates
Comment ID	4002849/CSPV/8
Respondent Organisation	Turley Associates
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	We note the reference to 'utilities' as part of Vision 2 concerning Weston-super-Mare, and note the commitment to ensuring that growth and the provision of utilities occurs in tandem. Priority Objective 2 (p.20), however, appears to indicate that it is only 'major' development proposals that will need to be developed in tandem with infrastructure. We consider that all development should be comprehensively considered. We therefore suggest that the LPA should make minor changes to Priority Objective 2 to address this matter.

Changes to be effective	We note the reference to 'utilities' as part of Vision 2 concerning Weston-super-Mare, and note the commitment to ensuring that growth and the provision of utilities occurs in tandem. Priority Objective 2 (p.20), however, appears to indicate that it is only 'major' development proposals that will need to be developed in tandem with infrastructure. We consider that all development should be comprehensively considered. We therefore suggest that the LPA should make minor changes to Priority Objective 2 to address this matter.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Bristol Water response.pdf (260Kb)

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/2
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	FOSBR (Friends of Suburban Bristol Railways) believes that, in order to achieve effective modal shift from the private car, improvements to North Somerset's rail infrastructure, in particular the restoration of passenger services on the Portishead line, should be explicitly included as priority objectives.
Changes to be effective	For "improve accessibility through the delivery of major transport schemes and local improvements" read: "improve accessibility through the delivery of major transport schemes, including the Portishead rail link, and local improvements, including improvements to the county's rail infrastructure".
Not consistent with national policy	The Department for Transport's policy Delivering a Sustainable Transport System (November 2008) includes supporting economic effectiveness and growth, tackling climate change, and improving quality of life as three of the five objectives of the Government's transport policy (para. 1.5). Including rail improvements as priority objectives would support these objectives. Delivering a Sustainable Transport System promotes "policies that encourage people to make low-carbon transport choices, which will be reflected in choices of investment in developing the transport system -- for example between road and rail" (para. 3.8; cf. Executive Summary, para. 9). "Indeed, we want to encourage the use of the railways as a lower-carbon transport mode in comparison to road" (para. 5.18). National policy supports modal shift to rail where this leads to greater sustainability. This should be reflected in the Core Strategy.
Changes to be consistent	See suggested revision under "effectiveness" above.
Attached documents	

Respondent Martyn Leisure

Respondent Name	Martyn Leisure
Comment ID	3583521/CSPV/7
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	Our client, Martyn Leisure, objects to the Priority Objectives as listed at Page 20 and supported by paragraphs 2.7 to 2.10. The spatial planning issue of the rural economy and specifically rural tourism has not been identified as a priority. Policy CS22 should be able to respond to a rural tourism policy Priority Objective given the importance of tourism is sustaining economies, having regard to the provisions of Planning Policy Statement 4.
Changes to be consistent	Martyn Leisure requests that Priority Objective 6 be reworded as follows: 6. Improve the vibrancy, prosperity, distinctiveness, quality and range of local services and wider visitor and tourist facilities in and around North Somerset's towns and villages. Also, by encouraging and supporting environmental enhancements and regeneration opportunities in Clevedon, Nailsea and Portishead. We would also suggest the following additional Priority Objective: 11.To support a successful economy, new and existing visitor

and tourist accommodation and facilities around North Somerset. To improve and regenerate existing accommodation and facilities where they support economic development and wider planning objectives.

Attached documents

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/1
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Origin3 does not believe Priorities 1, 3 and 5 are justified, they are not based upon a robust and credible evidence base and do not represent the most appropriate strategy. With regard to Priority 1, objection is made to the level of housing set. The evidence base supports a much higher growth rate. This matter is dealt with in more detail through comments on Policy CS13. Priority 3 and 5 are, on the whole, supported. However, a balanced strategy for delivery is more appropriate where the full range of drivers dictating housing demand, viability and supply are recognised and not solely by economic development.
Changes to be justified	The following two modifications are proposed: - Revise the scale of housing to reflect the genuine, local needs of north Somerset (as described in representation CS13. - Reword Priorities 3 and 5 to reflect a balanced strategy for growth at Weston-super-Mare.

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/1
Respondent Organisation	
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	It is considered that Priorities 1, 3 and 5 are not justified nor are they based upon a robust and credible evidence base and do not represent the most appropriate strategy for development in the District. In terms of Priority 1, objection is made to the level of housing set given that the evidence base supports a much higher growth rate. This matter is addressed in greater detail through representations to Policy CS13. Priorities 3 and 5 are generally supported; however a balanced strategy for delivery is more appropriate taking into consideration the full range of drivers which dictate housing demand and supply and not only by economic development.
Changes to be justified	·Reconsider the scale of housing to reflect the appropriate local needs of North Somerset District (as described in representation CS13) ·Ensure Priority 3 and 5 are reworded to reflect a balanced strategy for growth at Weston-super-Mare.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mr D Breeze

Respondent Name	Mr D Breeze
Comment ID	3320065/CSPV/4
Respondent Organisation	CMH Management Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We believe that the Core Strategy is unsound as the assumptions used to justify the proposed housing requirement of 13,400 over the plan period are fundamentally flawed and fail to follow national guidance. Moreover we believe that these are politically driven housing numbers, being lower than even officers calculated projections, which will adversely impact upon the ability of North Somerset to grow and recover from the recent recession and perform its function in the wider West of England region. This lack of new housing supply, being only 50% of the previous emerging RSS figure of 26,750, will in itself deter new and existing businesses from either expanding or relocating to the area, as housing supply constraints on this scale will inevitably lead to higher house prices for some whilst serving to exclude the less well off from accessing decent affordable housing. We believe that this housing requirement totally fails to address the current and worsening chronic shortage of affordable housing in the district and fails to meet local affordable housing needs. The cancellation of 13,350 homes also means 4,005 (30% using the Council's target) fewer affordable homes that could be delivered by local Registered Landlords leading to an exacerbation of the housing shortage for those members of the community most unable to compete for housing in the open market. This will impact greatest in the rural areas and smaller villages such as Cleeve where local people are already unable to compete for open market housing and by virtue of a lack of affordable new homes will be forced to leave the village altogether.
Changes to be justified	We believe that the Council should completely re-examine the growth strategy and justify why the work undertaken on the emerging RSS and the growth projections for the District prepared by Oxford Economics have been disregarded. We believe that the RSS figure (which remains a material consideration) should be used as the starting point for the growth projections over the plan period.

Not effective	The growth aspirations of the spatial strategy are unsound as they are neither deliverable or flexible being too reliant on two large sites in Weston. We also believe that this housing requirement totally fails to address the current and worsening chronic shortage of affordable housing in the district and fails to deliver adequate local affordable housing. Indeed 13,350 fewer homes also means 4,005 (30% using the Council's target) fewer affordable homes leading to an exacerbation of the housing shortage for those members of the community most unable to compete for housing in the open market. This will impact greatest in the rural areas and smaller villages such as Cleeve where local people are already unable to compete for open market housing and by virtue of a lack of affordable new homes will be forced to leave the village altogether.
Changes to be effective	The Core Strategy needs to be based on a wider dispersal of housing numbers and a higher growth level which would have more likelihood of delivering the other objectives of the vision.
Not consistent with national policy	See our responses to Vision 1 and Vision 2.
Changes to be consistent	See our responses to Vision 1 and Vision 2.
Attached documents	

Respondent Natural England

Respondent Name	Natural England
Comment ID	2862209/CSPV/3
Respondent Organisation	Natural England

Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	We note that with reference to priory objective 7 the Sustainability Appraisal (Page 48 of Main Report) suggested that in line with PPS2 and PPS17 this objective could also "consider the enhancement of green spaces for their recreation and biodiversity value where compatible with the primary aim of protection". We agree and suggest that the document could be more effective, and better reflect Government policy, if the objective were extended to include reference to the enhancement of green spaces for their recreation and biodiversity value.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Homes Severn Valley

Respondent Name	Persimmon Homes Severn Valley
Comment ID	3361153/CSPV/2
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The priority objectives are intended to demonstrate how the Council will address spatial planning issues within North Somerset to 2026. We are, however, concerned that some of the objectives identified are not sound, either through justification, or effectiveness. Priority Objective 1 is considered unjustified given the level of new homes proposed to 2026. The proposed level of new housing is significantly lower (by 13,350) than that set out in the emerging Regional Spatial Strategy (RSS). Despite the intention of the Coalition Government to abolish RSS documents, local authorities must still demonstrate a sufficiently robust evidence base to justify locally derived housing figures. We do not, however, believe that the Council has provided sufficient justification for the dramatic reduction in numbers proposed. This objective should be amended to reflect a level of housing growth capable of meeting the needs of a growing population in North Somerset. As currently worded, Priority Objective 6 is not considered justified. Whilst the intention to 'improve the vibrancy, prosperity, distinctiveness, quality and range of local services in North Somerset's towns and villages' is supported, this cannot be achieved by 'encouraging and supporting environmental enhancements and regeneration opportunities in Clevedon, Nailsea and Portishead' alone. If North Somerset's villages are to realise the improvements referred to in Priority Objective 6 there must also be recognition of the importance of the service villages.
Changes to be justified	Objective 6 should therefore be amended to reflect the important role of service villages across the District.
Not effective	Priority objective 8 seeks to 'redress the substantial inequalities between the most deprived and prosperous areas of North Somerset'. If this objective is to be effectively delivered the Core Strategy must allow for appropriate levels of affordable housing,

	in a range of locations. The policies contained in the Core Strategy do not, however, provide for the necessary level of development. The Core Strategy must also help to redress existing inequalities by enabling development capable of delivering on-site affordable housing across the District, including the service villages. This issue is dealt with in more detail under Policy CS16.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/7
Respondent Organisation	Persimmon Homes
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	Priority Objective 1 is not justified and effective: Persimmon Homes do not support the precise figure of 13,400 new homes, because we consider it is too low. However, we do support the housing figure being expressed as a minimum. What is not clear is how this will be monitored and the circumstances by which it can be increased without necessitating the need for a review of the Core Strategy.
Changes to be justified	-
Not effective	Priority Objective 1 is not justified and effective: Persimmon Homes do not support the precise figure of 13,400 new homes, because we consider it is too low. However, we do support the housing figure being expressed as a minimum. What is not clear is how this will be monitored and the circumstances by which it can be increased without necessitating the need for a review of the Core Strategy. Priority Objective 2 is not effective: Where development contributions are relied upon to fund improvements in physical and social infrastructure, it is important that "in tandem" is interpreted flexibly to enable development to generate funds to provide infrastructure. Priority Objective 3 is not effective: Persimmon Homes recognise the strategy to deliver housing in step with employment in Weston-super-Mare, but it is important that this Objective does not frustrate, or prevent housing needs being met. We note that there is no Objective to meet housing needs which we consider to be a minimum requirement and to ensure that monitoring of housing provision against needs is undertaken and any shortfalls identified and addressed. Priority Objective 4 is not effective: Persimmon Homes consider that Objective 4 should be limited to meeting the needs of an ageing population and should not, as an Objective, set out any one particular way of doing this by favouring supported living over residential care, or any other solution for addressing this. Priority Objective 6 is not effective: In particular we do not think this Objective will be achieved in Clevedon, Nailsea and Portishead, simply by encouraging environmental enhancements and regeneration opportunities. Priority Objective 7 is not effective: Opportunities which do not compromise these Objectives and will contribute to meeting other Objectives of the Core Strategy in supporting the role of settlements in a sustainable way, should be favourably considered.
Changes to be effective	-
Not consistent	

with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/4
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/3
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We note the priority objective to deliver 13,400 new homes by 2026 'to meet housing needs'. However, as has been established in the Council's evidence on setting a housing target (Keith Woodhead October 2010) this target will not meet housing needs in the district. It is a restrained target which is tied to rebalancing jobs and homes in the district. We support the first part of objective 4 to make provision for the needs of an ageing population. However, the second part of the objective refers to 'prioritising supported living, as opposed to residential care'. Whilst we fully understand that the Government's objective is to allow people to live in their homes for longer, residential care still has a role to play, particularly for people with dementia which is a growing issue. The care needs and accommodation of older people are complex and changing and can not be addressed through supported living alone. Government policy is to provide choice for older people. Indeed, some of the most innovative potential solutions fall within use class C2 or at the interface of use class C2 and C3. We therefore recommend that this objective is amended as below.
Changes to be justified	"Make provision for the needs of an ageing population, and encourage the full range of elderly person care accommodation needs" DELETE: 'prioritising supported living, as opposed to residential care'"
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS1

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/13
Respondent Organisation	Ashton Park Limited
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	This policy should now make appropriate reference to Ashton Park alongside other strategic locations for growth. A new settlement at AP is probably the most significant way in which NS can deliver on its climate change and carbon reduction commitments. The location of AP next to Bristol together with exemplar transport systems will deliver new homes with a lower carbon footprint and allow NS to rebalance its jobs/ homes ratio at WsM.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Avon Wildlife Trust

Respondent Name	Avon Wildlife Trust
Comment ID	1045217/CSPV/3

Respondent Organisation	Avon Wildlife Trust
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	<p>The Trust welcomes the explicit comments in Paragraph 5 of Policy CS1. Paragraph 6 is also welcomed although the Trust's view is that the paragraph needs to be strengthened to conform to national policy and legislation such as Working with the grain of nature: a biodiversity strategy for England (2002), which set out the Government's vision for conserving and enhancing biological diversity in England, together with a programme of work to achieve it. It included the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and enhance it wherever possible. In PPS9, the Government's objectives for planning are:</p> <ul style="list-style-type: none"> · to promote sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development, so that policies and decisions about the development and use of land integrate biodiversity and geological diversity with other considerations. · to conserve, enhance and restore the diversity of England's wildlife and geology by sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support. · to contribute to rural renewal and urban renaissance by: <ul style="list-style-type: none"> - enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognising that healthy functional ecosystems can contribute to a better quality of life and to people's sense of well-being;

	and - ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment. CS1 Paragraph 6 should therefore take into account that biodiversity should be protected and enhanced by the elimination of any adverse impacts on development sites.
Changes to be consistent	The Policy Paragraph 6, 2nd sentence, should be reworded as follows: 'This should be achieved through on and off-site measures to conserve and enhance species and habitats as well as the elimination of any adverse impacts through sensitive design and layout and construction of developments to meet biodiversity requirements'.
Attached documents	

Respondent Barrow Gurney Parish Council

Respondent Name	Barrow Gurney Parish Council
Comment ID	4618561/CSPV/4
Respondent Organisation	Barrow Gurney Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We support Policy CS1: Addressing climate change and carbon reduction, but there appears to be a blind spot in relation to the expansion of Bristol Airport both in regard to its continued expansion and major fuel usage (£22million in 2005 reference BIA report), the consequential traffic and environmental effects on local villages, and particularly so at a time of increasing fuel prices

	and major uncertainties of supply in the future. We recognize the role of the airport but there should be clearer limits to the pace and expansion. We also share concerns overall expressed by PCAA (Parish Councils Airport Association).
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	To meet the current and future expectations of Climate Change and updated Airport Policy and Localism Bill and agree proposals with the local communities directly affected by existing and proposed expansion plans.
Changes to be consistent	To reinforce 3.147 and 3.148 by noting the need to ensure that airport expansion does not cause unacceptable impacts on local communities, and that airport operatives are required to bring forward infrastructure schemes to mitigate the effects of their expansion on the highway network.
Attached documents	Barrow Gurney Parish Council letter CS10 and others (34Kb) Barrow Gurney Parish Council rep CS10 and others (63Kb)

Respondent Bristol Water plc - Turley Associates

Respondent Name	Bristol Water plc - Turley Associates
Comment ID	4002849/CSPV/1
Respondent Organisation	Turley Associates

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	Paragraph 3.9 of the Core Strategy states that primarily the Strategy seeks to address climate change by: - Reducing unsustainable carbon emissions, - Making all buildings more sustainable, - Encouraging sustainable transport patterns, and, - Planning for a sustainable distribution of land uses. Water consumption and efficiency are also of key importance in sustainable development. Bristol Water Plc is disappointed to see that there is no clear reference to this matter within the Strategy, and no reference to the Authority's statutory duty to have regard to water efficiency. We would welcome the inclusion of a paragraph detailing how this duty is to be carried out in relation to development. The topic of 'water efficiency' could be incorporated as part of Policy CS1. We would also suggest the inclusion at paragraph 3.19 of indicators to refer to the monitoring and review of water efficiency.
Changes to be effective	Bristol Water Plc is disappointed to see that there is no clear reference to the Authority's statutory duty to have regard to water efficiency. We would welcome the inclusion of a paragraph detailing how this duty is to be carried out in relation to development. The topic of 'water efficiency' could be incorporated as part of Policy CS1. We would also suggest the inclusion at paragraph 3.19 of indicators to refer to the monitoring and review of water efficiency.
Not consistent with national policy	Inconsistent with National Policies PPS12, PPG2, PPS4.
Changes to be consistent	

Attached documents[Bristol Water response by Turley Assoc.pdf](#) (260Kb)**Respondent Clevedon town Council**

Respondent Name	Clevedon town Council
Comment ID	4565185/CSPV/2
Respondent Organisation	Clevedon Town Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	But feel that the implication of CS1.1 should form a fundamental and active part of planning criteria. That planning officers and North Somerset Council, as the planning authority, should support this when considering applications for all developments with an emphasis on natural light and energy. for example ensuring that all flats have an outdoor drying area to eliminate the dependancy on tumble dryers and radiators.
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/3
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	None of the ten guiding principles set out in Policy CS1 mentions the potential of modal shift to rail to contribute to carbon reduction. While the additional mention of modal shift in general in para. 4 is welcome, FOSBR (Friends of Suburban Bristol Railways) believes that, to be effective, modal shift to rail should be explicitly mentioned among the guiding principles of CS1.
Changes to be effective	We suggest the addition of the following words after "more sustainable transport modes" at the end of para. 4: "In particular, increased use of the railway for passenger and freight transport will be encouraged by improvements to rail infrastructure and station reopenings".

Not consistent with national policy	See our earlier submission under "Priority Objectives" (p. 20).
Changes to be consistent	See suggested modification under "effectiveness" above.
Attached documents	

Respondent Home Builders Federation Ltd

Respondent Name	Home Builders Federation Ltd
Comment ID	2549089/CSPV/1
Respondent Organisation	Home Builders Federation Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Part 2 of the policy is insufficiently justified as the Council does not appear to have carried out a study to assess whether it is feasible to incorporate site-wide renewable energy. Such an approach is out of kilter with the Government's direction of travel with regard to carbon compliance as set out in the recent report to Government by the Zero Carbon Hub (Carbon Compliance: setting an appropriate limit for zero carbon new homes). Furthermore, paragraph 26 of the Planning and Climate Change Supplement to PPS1 requires local planning authorities to have an evidence-based understanding of the local feasibility and potential for

	<p>renewable and low carbon technologies. We have been unable to locate any such assessment. Any targets set should avoid prescription on technologies and be flexible in how carbon savings from local energy supplies are to be secured. Paragraph 33 of the Planning and Climate Change Supplement to PPS1 requires any policy relating to decentralised energy supply (either on or off-site) to be "evidence based and viable having regard to the overall costs of bringing sites to the market". The same paragraph goes onto describe how in the case of housing development councils must also demonstrate how the proposed approach is consistent with securing the expected pace of housing development set out in the housing trajectory and does not inhibit the provision of affordable housing. 8) Part 8 of the policy is unsound in specifying a preference for the re-use of previously developed land and existing buildings before green field sites are considered. While PPS3 sets a national target for at least 60% of new housing to be provided on previously developed land it does not require that all previously developed land is re-used before any green field releases can be countenanced. Such an inflexible approach could prove injurious to housing supply, employment and growth.</p>
Changes to be justified	<p>More helpfully, the core strategy could describe those incentives and interventions that it proposes to introduce to assist in meeting its objectives. This might include any public sector land release strategy, including any proposals it is developing in partnership with the Homes and Communities Agency (HCA) as part of its Public Land Initiative, or a reduction of affordable housing contributions in certain areas to help restore viability.</p>
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/2
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	Broad support is given to Policy CS1, addressing climate change and carbon reduction, however specific aspects of the policy are either not consistent with national planning policy or are not the most appropriate when considered against reasonable alternatives; the concerns are set out below. Point 2 suggests that all development should be encouraged to incorporate site-wide renewable energy solutions. This is too prescriptive and specific at this stage and should be reconsidered through site allocations documents. There is no clarity in the supporting text as to how this is to be interpreted, for example whether the reference is being made to centrally controlled district style systems, or a consistent approach to delivering individual energy solutions across a large site.

	<p>There is growing research to indicate that district style systems are not the most effective solution to incorporating efficient and sustainable renewable energy solutions. Far more sustainable and manageable solutions exist at the micro level. Developers and site promoters should give the opportunity to investigate all energy generation options, including those that link with the Waste Core Strategy. Point 8 promotes "the re-use of previously developed land and existing buildings in preference to the loss of Greenfield sites". This is not consistent with national planning policy, in particular PPS3 (Housing). Whilst Paragraphs 40, 43 and 44 of PPS3 identify the need to explore the use of previously developed land as a priority, paragraphs 52-57 also set out other delivery requirements. The policy should also be mindful of paragraph 69, which, although related to planning applications, provides a good summary of the key requirements of PPS3. PPS3 does not therefore express a straight preference for developing housing on previously development land over greenfield land, it requires a balance to be struck with other sustainability matters such as location and accessibility.</p>
Changes to be consistent	<p>Point 2 should therefore clarify what is meant by the term "site-wide", explaining that it relates to both micro and macro systems for the policy to be the most appropriate strategy. Point 8 should express a priority for the use of previously developed land unless more suitable, available and achievable greenfield sites exist.</p>
Attached documents	<p>Mead Realisations Ltd response.pdf (282Kb)</p>

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/2
Respondent Organisation	
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	<p>In general we support the principles of Policy CS1 which addresses climate change and carbon reduction. However specific aspects of the policy are either not consistent with national planning policy or are not the most appropriate when considered against reasonable alternatives. Point 2 provides that all development should be encouraged to incorporate site-wide renewable energy solutions. However no clarity is provided within the supporting text as to how this is to be interpreted, for example whether the reference is being made to centrally controlled district style systems, or a consistent approach to delivering individual energy solutions across a large site. There is growing research to indicate that district style systems are not the most effective solution to incorporating efficient and sustainable renewable energy solutions. Far more sustainable and manageable solutions exist at the micro level. Point 8 encourages "the re-use of previously developed land and existing buildings in preference to the loss of Greenfield sites". This is inconsistent with national planning policy, in particular PPS3 (Housing). Whilst Paragraphs 40, 43 and 44 of PPS3 identify the need to explore the use of previously developed land as a priority, paragraphs 52-57 also set out other delivery requirements. The Council should also be mindful of paragraph 69, which, although related to planning applications, provides a good summary of the key requirements of PPS3. PPS3 does not therefore express a direct preference for developing housing on previously development land over greenfield land, rather it requires a balance with other sustainability matters such as location and accessibility. In addition, the tests of availability, suitability and achievability also need to be considered and in some cases, the development of greenfield land will prove to be the most appropriate option.</p>
Changes to be justified	<p>Point 2 should provide clarification of what is intended by the term 'site wide', explaining that it relates to both micro and macro systems for the policy to be the most appropriate strategy. Point 8 should express a priority for the use of previously developed land unless more suitable, available and achievable greenfield sites exist.</p>
Not effective	
Changes to be effective	
Not consistent with	<p>In general we support the principles of Policy CS1 which addresses climate change and carbon reduction. However specific aspects of the policy are either not consistent with national planning policy or are not the most appropriate when considered against reasonable alternatives. Point 2 provides that all development should be encouraged to incorporate site-wide renewable energy solutions. However no clarity is provided within the supporting text as to how this is to be interpreted, for example whether</p>

national policy	the reference is being made to centrally controlled district style systems, or a consistent approach to delivering individual energy solutions across a large site. There is growing research to indicate that district style systems are not the most effective solution to incorporating efficient and sustainable renewable energy solutions. Far more sustainable and manageable solutions exist at the micro level. Point 8 encourages "the re-use of previously developed land and existing buildings in preference to the loss of Greenfield sites". This is inconsistent with national planning policy, in particular PPS3 (Housing). Whilst Paragraphs 40, 43 and 44 of PPS3 identify the need to explore the use of previously developed land as a priority, paragraphs 52-57 also set out other delivery requirements. The Council should also be mindful of paragraph 69, which, although related to planning applications, provides a good summary of the key requirements of PPS3. PPS3 does not therefore express a direct preference for developing housing on previously development land over greenfield land, rather it requires a balance with other sustainability matters such as location and accessibility. In addition, the tests of availability, suitability and achievability also need to be considered and in some cases, the development of greenfield land will prove to be the most appropriate option.
Changes to be consistent	Point 2 should provide clarification of what is intended by the term 'site wide', explaining that it relates to both micro and macro systems for the policy to be the most appropriate strategy. Point 8 should express a priority for the use of previously developed land unless more suitable, available and achievable greenfield sites exist.
Attached documents	

Respondent Parish Councils Airport Association (Burn)

Respondent Name	Parish Councils Airport Association (Burn)
Comment ID	1010593/CSPV/3
Respondent Organisation	Parish Councils Airport Association
Do you consider this	No

part of the Core Strategy to be sound?	
Not justified	The Core Strategy retains a conflict between economic growth and sustainable growth required to live within our environmental limits. Policy CS1 is in direct confrontation with CS23. Policy CS1 has omitted any mention of Bristol Airport's greenhouse gases which is one the fastest growing sources within the West of England. Bristol Airport has produced projections of numbers of future aircraft flights from which the level of greenhouse gas (ghg) emissions may be estimated. Figures for 2019 are given in Table 1 and are compared with emissions from Bath &NES and other neighbouring local authorities. This shows that with LA emissions falling, but aviation emissions rising, even by 2019 Bristol International Airport (BIA) will be responsible for a high proportion of ghg emissions from the area. Table 1 Carbon dioxide emissions for 2019 assuming (i) L.A. reductions in accord with the Nottingham Declaration, (ii) airport expansion according its planning application. This comment also relates to Vision 1 and Priority Objective 1. SEE ATTACHED FOR TABLE.
Changes to be justified	CS1 must highlight that flying with its current carbon footprint is an unsustainable travel pattern and the policy should support alternatives such as the electrification of the South West rail network and a High Speed rail service to connect to London and Europe. The PCAA has highlighted in previous consultations that living within our environmental limits should be given priority in decision making.
Not effective	CS1 will only be deliverable if it highlights not only the positives of reducing greenhouse gases but the negatives. No negatives have been given in this policy thus avoiding any mention of Bristol Airport.
Changes to be effective	Monitoring should include the emissions from car journeys to and from the airport, airport activities and flights in order that these figures are available for planning decisions. CS1 should identify the major ghg emitters within North Somerset and present intentions for reducing their carbon footprints The Cost of Carbon should have been included in the Sustainability Appraisal table of options and we request that the price of carbon is included, presently Â£27 per tonne of CO2 rising further by 2026.
Not consistent with national policy	The Committee for Climate Change (CCC) was formed as an independent body to advise Government on all aspects of Climate Change and how to tackle it in the UK. It has reported on aviation and the Government will be commenting on the report in July 2011. These views should be taken into consideration.

Changes to be consistent	If the Government accepts the CCC aviation report, the aviation sector will have to reduce its carbon emissions by 2050 to 2005 levels alongside every other sector in the UK thus making a 90% cut rather than the 80% target set by the Climate Change Act. The CCC has concluded that passenger numbers could rise by 60% in this period and Air Transport Movements (ATM) by 55%. If this happens, the aviation sector would have to ration expansion in order to achieve its carbon targets. Bristol Airport may be constrained and this possibility should be included in CS1.
Attached documents	CS1 response from Parish Councils Airport Assoc.doc (65Kb)

Respondent Persimmon Homes Severn Valley

Respondent Name	Persimmon Homes Severn Valley
Comment ID	3361153/CSPV/3
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Reference under bullet point two to 'all developments' being 'encouraged to incorporate site-wide renewable energy solutions to provide a proportion of the energy required' is not considered to be sufficiently justified. It is unclear whether the Council has provided sufficient evidence to demonstrate whether it is feasible for all developments to be encouraged to incorporate site-wide renewable energy.
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/8
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No

Not justified	This Policy is not justified and effective. The Policy contains a number of requirements that are included in other Policies. The clarity of the Core Strategy is not helped by this repetition. The first 3 numbered parts of the Policy are covered in more detail, or with more specific requirements in Policy CS2 and Part 1 also notably includes a cross reference to CS2. We also question in CS1 whether Part 2 should require all developments to incorporate site wide renewable energy solutions. Site wide energy solutions are only likely to be viable and practical in relation to a single dwelling, or larger scale developments. The Core Strategy should be based on an evidence based approach which demonstrates the practicality and viability of such an approach and it clearly is not. In relation to Part 3, CS2 deals more specifically with the Code for Sustainable Homes. Part 4 would be better in Policy CS10, Part 5 in CS9 and Part 6 in CS4. Part 8 previously developed land is anyway included in other Policies, but as set out here is contrary to Government Policy which does not support use of brown field land before green field. Part 7, dealing with minimisation of waste, is an Objective which could form part of that section of the Core Strategy and the creation of waste to energy facilities in Weston Villages is already included in Policy CS30. Also, Paragraph 3.18 says that the wide scope of the Policy translates to the variety of interests responsible for delivering action on climate change. Our difficulty is that the Policy fails to do that and 7 of the 8 criteria relate solely to actions associated with new development. There is nothing in the Policy dealing with existing development and buildings and in respect of achieving changes in housing, the Policy seeks to achieve change by targeting less than 10% of the total housing stock.
Changes to be justified	Part 4 would be better in Policy CS10, Part 5 in CS9 and Part 6 in CS4. Part 8 previously developed land is anyway included in other Policies, but as set out here is contrary to Government Policy which does not support use of brown field land before green field. Part 7, dealing with minimisation of waste, is an Objective which could form part of that section of the Core Strategy and the creation of waste to energy facilities in Weston Villages is already included in Policy CS30.
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/5
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Woodland Trust

Respondent Name	Woodland Trust
Comment ID	3326881/CSPV/1
Respondent Organisation	Woodland Trust
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	Policy CS1: Addressing climate change and carbon reduction We are pleased to support this policy, particularly paragraph 5 which specifies that green infrastructure would include not only green spaces but also the creation and enhancement of woodland areas. We also support the comment in paragraph 10 that states: 'areas will be enhanced to be resilient to the impacts of climate change flood defence and public realm enhancements including the integration of effective shading through, for example, tree planting'.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents

Section CS2

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/11
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Amend the policy wording to include reference to Ashton Park . This new settlement has demonstrated through the plans and technical evidence that it can achieve a very high standard of sustainable design and construction.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/3
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>This proposed policy sets out specific policy requirements to provide: 15% renewable energy on all sites of 10 or more dwellings or commercial floorspace over 1000 sqm; 50% of all homes to be constructed to life time homes standard up to 2013 and all post 2013. We object to these requirements as firstly there is no recognition of the significant costs that these requirements will bring to developments which in addition with other contributions sought elsewhere by the Council (Policy CS34 -Infrastructure delivery and development contributions) will render many housing, employment and other developments un-viable. This will completely undermine the delivery of the required housing, employment and other developments necessary to meet the needs of the District to 2026. No justification, evidence base or viability assessment has been prepared or presented to demonstrate and substantiate the policy of seeking 15% renewable energy as proposed by Policy CS2. PPS1, Renewable Energy Supplement at paragraph 26 identifies that any targets set within Development Plans for delivering renewable energy should consider viability. Finally Policy CS2 seeks to introduce Lifetime home standards to 50% of all homes built prior to 2013 and all homes post 2013. However there is no policy basis at a National level to support this policy target. Additionally there is no local evidence base or viability assessment undertaken alongside the Core Strategy to demonstrate why this element should be provided for within Policy CS2. There is also a wider issue in that the Core Strategy is departing from the Household Projections 2008 by under providing for the housing and distribution requirements of the District to 2026 and then exceeding national requirements in relation to Code for</p>

	Sustainable Homes, renewable energy and Life Time Homes standards. The Council are therefore following a completely arbitrary, unsupported and unjustified policy approach within the Core Strateg
Changes to be justified	The deletion of Policy CS2 and it's rewriting to provide policies in compliance with PPS1. These changes should ensure that the: · Renewable energy targets which are supported by viability assessments and an appropriate evidence base; and · Lifetime home standards are deleted.
Not effective	
Changes to be effective	
Not consistent with national policy	Please see above in relation to Justified. The Policy as written is considered not to be compliant with PPS 1.
Changes to be consistent	Please see above in relation to Justified.
Attached documents	

Respondent Bristol Water plc - Turley Associates

Respondent Name	Bristol Water plc - Turley Associates
Comment ID	4002849/CSPV/2
Respondent Organisation	Turley Associates

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	With regard to Policy CS2, Bristol Water would particularly welcome the inclusion of details of how water consumption in new-build housing will be addressed. In the future, the significant increase in population relative to water resources will result in the area becoming 'water stressed' as defined by the Environment Agency. We note the commitment within Policy CS2 to meet Code Level 3 now, and we support the commitment to ensuring that Code Level 4 will be a minimum standard for new build. We would ask that it be clarified that the requirement to meet Code Levels 4 and 6 also applies to water consumption as well as energy use and embodied carbon.
Changes to be effective	We would ask that it be clarified that the requirement to meet Code Levels 4 and 6 also applies to water consumption as well as energy use and embodied carbon.
Not consistent with national policy	Inconsistent with National Policies PPS12, PPG2, PPS4.
Changes to be consistent	
Attached documents	Bristol Water response by Turley Associates.pdf (260Kb)

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/4
Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	CPRE support the proposals in CS2 but consider they could go further. Comment also relates to Visions 1 and 7 and Priority Objectives 1,2,5 and 6.
Changes to be justified	The Core Strategy could be enhanced by an additional reference to quality and appropriateness of materials. These materials should give consideration to their location and impact on the surrounding area. Drainage schemes, in addition to consideration of new development, should consider the cumulative impact on the local area.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Home Builders Federation Ltd

Respondent Name	Home Builders Federation Ltd
Comment ID	2549089/CSPV/2
Respondent Organisation	Home Builders Federation Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>We refer to paragraphs 26, 31 and 33 of the Planning and Climate Change Supplement to PPS1. Evidence is needed to demonstrate that it is feasible for residential development to meet the different levels of the Code specified in the strategy. While the Government's programme towards zero carbons homes from 2016 onwards is mandatory it only relates to Part L of the Building Regulations, and this represents one part of the Code for Sustainable Homes. Paragraph 31 of the PPS states that if local authorities wish to anticipate levels of building sustainability in advance of national requirements (such as the Building Regulations which set out the pathway to 2016) then planning authorities "must be able to demonstrate clearly the local circumstances that warrant and allow this". Part 2 of the policy is also out of kilter with the direction of Government zero carbon policy. Merton style rules (specifying percentages of on-site renewables) are no longer appropriate and it is up to developers how they meet the targets in the programme towards zero carbon homes. The requirement set out in Part 3 of the policy, insofar as it relates to the energy efficiency part of the Code, is sound, as it is in keeping with the Building Regulations. However, setting a policy for energy efficiency is superfluous as it merely repeats what is addressed under the Building Regulations and so a planning policy in this area is unnecessary. It should be deleted.</p>

Changes to be justified	Because the Council has inadequately researched this area and because this is a fluid and quickly changing regulatory regime, we recommend strongly that matters pertaining to sustainable construction are not dealt with under planning policy, but by the Building Regulations and the Government's mandatory programme to zero carbon. We recommend that the policy is deleted.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/3
Respondent Organisation	Origin3
Do you consider this	No

part of the Core Strategy to be sound?	
Not justified	<p>The policy, as currently written, is unsound because it is not the most appropriate strategy when considered against the reasonable alternatives and in some cases, is not justified; particular reference is made to points 2 and 3. Point 2 requires the use of on-site renewable energy sources or a link to similar sources off site. Whilst an objection is not made to this type of requirement, questions are raised as to the evidence base for the level of provision? The requirement is not justified within the wider non-policy text of the draft Core Strategy. There is no link to a national policy or historic RSS evidence base documents either. Point 3 indicates a timeframe for the introduction of Code level 4 and 6 housing requirements. This pre-supposes that there will be no changes to the timetable for revising Building Regulations. Questions are currently being raised about whether Code level 6 in its present form is realistically achievable? The requirement to achieve Code level 6 by 2016 is not enshrined in PPS1 Climate Change Supplement as such, the Core Strategy has significant potential to become out of step with emerging national policy and Building Regulations. Paragraph 32 of PPS1 indicates that local planning authorities can consider setting higher standards than Building Regulations, but caveats this on the basis that, amongst other matters, regard is had to the overall cost of bringing sites to the market. It also makes particular reference for the need to ensure the proposed approach is consistent with securing the expected supply and pace of housing development. Having regard to S106 requirements and community infrastructure contributions, greater consideration should be given to the impact of seeking to secure such code levels in advance of Building Regulation changes. The suggested timeframe could have an impact upon the delivery of housing in line with local need.</p>
Changes to be justified	<p>Establish an evidence base for seeking up to 5% of energy to be provided from on-site renewable sources. Remove the reference to specific code levels and timescales unless it can be demonstrated, in line with other contributions that it would not have a negative impact upon the delivery of housing.</p>
Not effective	
Changes to be effective	
Not consistent with	<p>See attached.</p>

national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS2 presents the Council's approach to sustainable development and although the general aims and objectives of the policy are supported, we raise queries about some of the criteria that it sets. The policy as currently written is considered unsound as it does not represent the most appropriate strategy when considered against the reasonable alternatives. Furthermore, in some instances it is not justified, in particular reference is made to points 2 and 3. Point 2 requires the use of on-site renewable energy sources or a link to similar sources off site. Although we do not wish to object to this type of requirement, we do raise queries with regard to the evidence base for the level of provision? The requirement is not justified within the text the policy. Furthermore,

	<p>there is no link to any national policy or past RSS evidence base documents either. Point 3 indicates a timeframe for the introduction of Code level 4 and 6 housing requirements, assuming there will be no changes to current Building Regulations. Concerns exist surrounding whether Code level 6 in its current form is realistically achievable. The requirement to achieve Code level 6 by 2016 is not endorsed within PPS1 Climate Change Supplement and therefore the Core Strategy has significant potential to become non-compliant with emerging National Policy and Building Regulations. Paragraph 32 of PPS1 indicates that local planning authorities can consider setting higher standards than Building Regulations, but provides caution on the basis that, amongst other matters, regard is had to the overall cost of bringing sites to the market. Specific reference is also made to ensure the proposed approach by Local Authorities within plans is consistent with securing the expected supply of housing development. Greater consideration of the impact of seeking to secure Code levels prior to Building Regulation changes and S106 requirements and community infrastructure contributions.</p>
Changes to be justified	<p>Ensure evidence base exists for seeking 15% of energy to be provided from on-site renewable sources. Take out the reference to specific code levels and timescales unless it can be demonstrated, in conjunction with other contributions that it would not have a detrimental impact upon the delivery of housing.</p>
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Homes Severn Valley

Respondent Name	Persimmon Homes Severn Valley
Comment ID	3361153/CSPV/4
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Policy CS2, as currently worded, is not considered to be justified or effective. The requirement in (2) for residential developments to meet a minimum of either 10% or 15% of predicted energy use through on-site renewable sources, or by linking with available off-site renewable energy sources, is not considered to be fully justified or deliverable. Such policy wording is not considered to be in line with current national policy thinking. It is also unrealistic to expect all developments to achieve this level without taking account of feasibility and viability on a site by site basis. If such a policy was to be included, it should clearly refer to the need to consider viability and feasibility in all cases. This would also be consistent with the supporting text (Paragraph 3.32). The requirement in (3) for all new dwellings to achieve Code Level 4 from 2013, and Level 6 by 2016, is not considered to be fully justified and deliverable. The supplement to PPS1 (Paragraph 31) requires local authorities to clearly demonstrate where local circumstances justify levels of building sustainability ahead of national requirements. This has not, however, been sufficiently demonstrated in respect of Policy CS2(3). Any policy should also clearly state that viability and feasibility should be taken into account on a site by site basis.</p>
Changes to be justified	<p>If such a policy was to be included, it should clearly refer to the need to consider viability and feasibility in all cases. Any policy should also clearly state that viability and feasibility should be taken into account on a site by site basis.</p>

Not effective	Policy CS2, as currently worded, is not considered to be justified or effective. The requirement in (2) for residential developments to meet a minimum of either 10% or 15% of predicted energy use through on-site renewable sources, or by linking with available off-site renewable energy sources, is not considered to be fully justified or deliverable. Such policy wording is not considered to be in line with current national policy thinking. It is also unrealistic to expect all developments to achieve this level without taking account of feasibility and viability on a site by site basis. If such a policy was to be included, it should clearly refer to the need to consider viability and feasibility in all cases. This would also be consistent with the supporting text (Paragraph 3.32). The requirement in (3) for all new dwellings to achieve Code Level 4 from 2013, and Level 6 by 2016, is not considered to be fully justified and deliverable. The supplement to PPS1 (Paragraph 31) requires local authorities to clearly demonstrate where local circumstances justify levels of building sustainability ahead of national requirements. This has not, however, been sufficiently demonstrated in respect of Policy CS2(3). Any policy should also clearly state that viability and feasibility should be taken into account on a site by site basis.
Changes to be effective	If such a policy was to be included, it should clearly refer to the need to consider viability and feasibility in all cases. Any policy should also clearly state that viability and feasibility should be taken into account on a site by site basis.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
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Comment ID	3998081/CSPV/9
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>This Policy is not justified or effective. The second paragraph of the Policy is unnecessary and should be deleted. Policies for Weston Villages and Weston Town Centre are set out in more detail in Policies CS29 and CS30. It is unnecessary to set out the aim that development should demonstrate exemplar environmental standards in a Policy which in Parts 2, 3 and 4 set out in detail precisely what standards development is expected to meet. This Paragraph also makes an assumption that larger scale development is more likely to meet higher standards. That is not necessarily the case, because larger scale developments also have higher demands for other infrastructure provisions. Therefore, Part 2 of the Policy should be subject to a Viability Test. Part 3 accords with the National Timetable for the introduction of the Code for Sustainable Homes and encourages this to be accelerated where supported by scheme viability. However, it is not just viability that is an issue here, but whether suitable technology is available to advance beyond Code Level 4 before 2016. Also, application of BREEAM Standards to non-residential development should be subject to a specific Viability Test. Parts 2 and 3 of the Policy lack flexibility. It is inappropriate to require specific amounts of on-site renewables and to require all parts of the Code for Sustainable Homes to be met in their entirety. It is for individual developments to assess how best to meet the targets on a site by site basis. The requirement to build all homes to Lifetime Homes Standards by 2013 is excessive and contrary to the justification in Paragraph 3.23, which says the Council considers it appropriate to require "a proportion" of houses to Lifetime Homes Standards. Also, we can find no evidence to justify 50% requirement. The final Paragraph of the Policy is incorrect to link site wide renewable energy solutions to the achievement of zero carbon standards by 2016.</p>
Changes to be justified	-

Not effective	<p>This Policy is not justified or effective. The second paragraph of the Policy is unnecessary and should be deleted. Policies for Weston Villages and Weston Town Centre are set out in more detail in Policies CS29 and CS30. It is unnecessary to set out the aim that development should demonstrate exemplar environmental standards in a Policy which in Parts 2, 3 and 4 set out in detail precisely what standards development is expected to meet. This Paragraph also makes an assumption that larger scale development is more likely to meet higher standards. That is not necessarily the case, because larger scale developments also have higher demands for other infrastructure provisions. Therefore, Part 2 of the Policy should be subject to a Viability Test. Part 3 accords with the National Timetable for the introduction of the Code for Sustainable Homes and encourages this to be accelerated where supported by scheme viability. However, it is not just viability that is an issue here, but whether suitable technology is available to advance beyond Code Level 4 before 2016. Also, application of BREEAM Standards to non-residential development should be subject to a specific Viability Test. Parts 2 and 3 of the Policy lack flexibility. It is inappropriate to require specific amounts of on-site renewables and to require all parts of the Code for Sustainable Homes to be met in their entirety. It is for individual developments to assess how best to meet the targets on a site by site basis. The requirement to build all homes to Lifetime Homes Standards by 2013 is excessive and contrary to the justification in Paragraph 3.23, which says the Council considers it appropriate to require "a proportion" of houses to Lifetime Homes Standards. Also, we can find no evidence to justify 50% requirement. The final Paragraph of the Policy is incorrect to link site wide renewable energy solutions to the achievement of zero carbon standards by 2016.</p>
Changes to be effective	-
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent R Burrows

Respondent Name	R Burrows
Comment ID	939361/CSPV/1
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The demand for the code for sustainable homes implementation schedule (CS2 bullet point 3) is no longer justified as it was quite clearly set out in Grant Shapps announcement on the 25th November 2010 'Shapps: We're lifting burdens from the backs of builders' that all types of additional imposed conditions termed 'gold plating' were to be scrapped in favour of a more collaborative approach. As these issues are already dealt with quite clearly under Building Regulations there is no need to place an unnecessary further level of bureaucracy over and above what is already legally required. Furthermore to include conversions as a catch all is a clear example of what Mr Shapps' statement was squarely aimed at. The statement is to be found here http://www.communities.gov.uk/news/corporate/1779881
Changes to be justified	The items specially mentioning the code for sustainable homes levels and when they are to be implemented and to what (conversions) should simply be removed as these are dealt with by building regulations, which are much more stringent than planning permission requires. Please leave the changes to the code levels to central government and the building regulations regime and take on board the statement made by Mr Shapps.
Not effective	

Changes to be effective	
Not consistent with national policy	The demand for the code for sustainable homes implementation schedule (CS2 bullet point 3) is no longer justified as it was quite clearly set out in Grant Shapps announcement on the 25th November 2010 'Shapps: We're lifting burdens from the backs of builders' that all types of additional imposed conditions termed 'gold plating' were to be scrapped in favour of a more collaborative approach. As these issues are already dealt with quite clearly under Building Regulations there is no need to place an unnecessary further level of bureaucracy over and above what is already legally required. Furthermore to include conversions as a catch all is a clear example of what Mr Shapps' statement was squarely aimed at. The statement is to be found here http://www.communities.gov.uk/news/corporate/1779881
Changes to be consistent	The items specially mentioning the code for sustainable homes levels and when they are to be implemented and to what (conversions) should simply be removed as these are dealt with by building regulations, which are much more stringent than planning permission requires. Please leave the changes to the code levels to central government and the building regulations regime and take on board the statement made by Mr Shapps.
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/4
Respondent Organisation	-
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	<p>We welcome the Council's attempts to increase the level of renewable energy to be secured from new residential developments. However, as this policy has not been subject to a viability assessment, we are unable to support it at the present time. PPS12 clearly states that policies should be underpinned by robust evidence to be considered sound, this is currently not the case. This can easily be done at the same time as the economic viability assessment of the affordable housing policy which is yet to be completed. We are also concerned about the use of the word 'minimum' in this policy. This makes this policy requirement extremely inflexible to apply and does not allow for the consideration of these issues on a case-by-case basis. There could be very good economic viability or simple practicality issues which would make the implementation of these requirements undesirable in certain developments. The Council should state that this policy will only be required where viable and feasible. This principle should apply to all the design requirements in this policy. We consider that the Code for Sustainable Homes requirements can be dealt with through building regulations and a separate planning policy is not required. We also question whether it is appropriate to set a target for new homes to achieve the Lifetime Homes Standard. The Government has already announced that it is not going to implement the HCA's draft Design and Quality Standards for affordable homes (which included Lifetime Homes Standards) and instead wants to see all new public and private homes meet the same set of standards which are not as onerous and expensive. Until more information is made available on what form these requirements will take, it is not considered appropriate to include such a policy within the Core Strategy.</p>
Changes to be justified	<p>The Council should state that this policy will only be required where viable and feasible. This principle should apply to all the design requirements in this policy. We consider that the Code for Sustainable Homes requirements can be dealt with through building regulations and a separate planning policy is not required. We also question whether it is appropriate to set a target for new homes to achieve the Lifetime Homes Standard. Until more information is made available on what form these requirements will take, it is not considered appropriate to include such a policy within the Core Strategy.</p>
Not effective	
Changes to be effective	
Not consistent	

with national policy	
Changes to be consistent	
Attached documents	

Section CS3

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/4
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Please see attached form.
Changes to be justified	Please see attached form.
Not effective	The Policy CS3 is unsound due to lack of effectiveness, see the details in form.
Changes to be effective	The Policy CS3 should be re written to be more effective, see policy wording in form.

Not consistent with national policy	The Policy is not consistent with national policy, PPS25 etc and is therefore unsound. See the points above that should be taken into account.
Changes to be consistent	The revised wording of policy CS3 will make it sound with regard to national policy subject to finding more appropriate wording for the 1st paragraph.
Attached documents	Ashton Park response CS3.doc (593Kb)

Respondent Coal Authority

Respondent Name	Coal Authority
Comment ID	928833/CSPV/1
Respondent Organisation	The Coal Authority
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	<p>The Coal Authority considers that the policy as written does not fully set out the correct interpretation to PPG14 in relation to ground instability nor does it assist the reader by the inclusion of appropriate text to indicate how the policy is to be interpreted and implemented. The Coal Authority does fully support the inclusion of land stability issues within the list of potential constraints to be addressed by proposed policy CS3: Environmental Impacts in the supporting text. The North Somerset area contains coal resources which are capable of extraction by surface mining operations. The current Energy White paper, published in May 2007, estimated that "by 2020 fossil fuels are expected to supply the great majority of UK energy needs and 14% of primary energy demand will be met by coal." The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In instances where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required. See supporting document for full response.</p>
Changes to be consistent	<p>For the sake of clarity, and to aid interpretation of the Core Strategy, The Coal Authority considers that it would be helpful to include reference within the supporting text (as set out in previous section) to the legacy of coal mining within North Somerset since this has the potential to raise land stability issues in some areas. This could also helpfully draw attention to the fact that The Coal Authority's written permission may be required for development activities within the affected areas. The Coal Authority made these comments at the last consultation stage but unfortunately these have not been addressed or incorporated into the Core Strategy. The following text is suggested for this purpose: "Coal Mining Legacy: Parts of North Somerset have been subjected to former coal mining activities which will have left an environmental legacy. The main affected areas are the eastern part of Portishead, Nailsea and its surrounding area, and the eastern part of Long Ashton and its surrounding area. Within these areas, new development proposals should take account of any land stability and other public safety risks associated with coal mining and, if necessary, incorporate appropriate mitigation measures to address them. Developers should also note that any intrusive activities that intersect, disturb or enter any coal seams, coal workings or coal mine entries require the prior written permission of the Coal Authority. Such activities could include site investigation boreholes, digging of foundations, other ground works and any subsequent treatment of coal mine workings and coal mine entries for stability purposes. Further information can be found on the Coal Authority's website at www.coal.gov.uk " Reason - To ensure that attention is drawn to this important locally distinctive issue in line with the requirements of PPG14 (Development on Unstable Land)</p>

Attached documents[The Coal Authority response CS3](#) (36Kb)**Respondent Home Builders Federation Ltd**

Respondent Name	Home Builders Federation Ltd
Comment ID	2549089/CSPV/3
Respondent Organisation	Home Builders Federation Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We are unclear why this policy is in the Core Strategy. The suitability of land for residential development are matters which should be addressed by the Strategic Housing Land Availability Assessment (SHLAA) with the evidence from this helping to inform the core strategy and its spatial choices about where new development should broadly be directed and located (PPS12, paragraph 4.5). The policy largely repeats guidance in PPS25 and the DCLG's SHLAA Practice Guidance.
Changes to be justified	The policy should be deleted.
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/4
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	Policy CS3 is not considered necessary as part of the Core Strategy as its main purpose is to restate the sequential testing process with regards to development in zones 2 and 3 of the Environment Agency Flood Map as set out within national planning policy PPS25. The policy is therefore not locally focussed. The determination of planning applications within flood zone areas can be made against the directive requirements of PPS25 and not this repetitive Core Strategy policy. In addition, the Coalition Government has previously indicated the removal of PPS's with the introduction of the National Planning Framework meaning the future of PPS25 is indefinite. A situation may exist therefore within the plan period that PPS25 is revoked leaving the development plan for North Somerset out of conformity with national policy. The inclusion of repetitive local policies within Core Strategies is not encouraged within PPS12 (paragraph 4.30). It is not necessary to include Policy CS3 within the Core Strategy.
Changes to be consistent	This Policy is not required within the Core Strategy and should be removed.
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/4
Respondent Organisation	
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	Policy CS3 is not required as part of the Core Strategy given its repetition of the sequential testing process regarding development in zones 2 and 3 of the Environment Agency Flood Map already set out within national planning policy PPS25. The policy provides no local focus. Planning applications within flood zone areas can be determined against the directive requirements of PPS25. Policy CS3 is therefore not needed. Furthermore, the Coalition Government has recently indicated the removal of PPS's with the introduction of the National Planning Framework suggesting that the future of PPS25 is currently unclear. Therefore a situation may arise within the plan period that PPS25 is removed thus leaving the development plan for North Somerset out of conformity with national policy. In addition, the inclusion of repetitive local policies within Core Strategies is not encouraged within paragraph 4.30 of PPS12. Policy CS3 is not required within the Core Strategy.
Changes to be consistent	This Policy is not required within the Core Strategy and should be removed.
Attached documents	

Respondent Natural England

Respondent Name	Natural England
Comment ID	2862209/CSPV/4

Respondent Organisation	Natural England
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS4

Respondent Avon Wildlife Trust

Respondent Name	Avon Wildlife Trust
Comment ID	1045217/CSPV/2
Respondent Organisation	Avon Wildlife Trust
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	The Trust appreciates the detailed nature conservation policy spelt out in Policy CS4: Nature Conservation and is pleased that this is given so much prominence in the Core Strategy. However, the wording is not strong enough to be consistent with national policy as spelt out in our other submission on Policy CS1. The policy is also not internally consistent with Policy CS1 which outlines that the principle of 'protecting and enhancing biodiversity' will guide development.
Changes to be consistent	The Trust recommends strengthening the wording of Paragraphs (1) to (3) in Policy CS4 by omitting 'seeking to' and inserting (1) 'meeting local, regional...'; (2) 'ensuring that new development is...'; and (3) 'protecting and enhancing important habitats'. Paragraph 2 should also be reinforced by emphasising that development should not result in net loss of biodiversity interest' but should achieve net gain' omitting 'where possible'. This should also be repeated in Paragraphs 3.66 and 3.76 to ensure that the core strategy is in conformity with national policy as spelt out for Policy CS1.
Attached documents	

Respondent CLIFF DUMBELL

Respondent Name

CLIFF DUMBELL

Comment ID	3314689/CSPV/2
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Leigh Woods Society

Respondent Name	Leigh Woods Society
Comment ID	1046529/CSPV/1
Respondent Organisation	Leigh Woods Society
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/5
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	The protection of the natural environment is supported although Policy CS4 should also recognise the development needs within the District when considering environmental impacts of new development, in accordance with national planning policy. In particular point 2 states that new development should be designed to "maximise benefits to biodiversity". This is not compliant with national planning policy, particularly PPS1 whereby it is stated in paragraph 24 under point (v) that new development should take account of the effects on the environment as well as the positive effects of development in terms of economic benefits and social well being. It continues in paragraph 28 to state that planning authorities should ensure that sustainable development is treated in an integrated way in their development plans, carefully considering the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development. Paragraph 29 of PPS1 provides that in some circumstances, a planning authority may decide in reaching a decision to give different weight to social, environmental, resource or economic considerations. New development should therefore represent the balancing of different objectives, some of which might outweigh others. For that reason, Policy CS4 and other parts of the Core Strategy should acknowledge that the impact of new development should be considered in a balanced manner which seeks to achieve outcomes enabling social, environmental and economic objectives collectively. This also accords with the Coalition Government's Localism Agenda.
Changes to be consistent	Point 2 requires rewording to remove the phrase "maximise" when considering the benefits to biodiversity and to encourage the balancing and complementing of the needs of the population with the protection of the natural environment.
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/5
Respondent Organisation	

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	<p>Although the protection of the natural environment is supported, Policy CS4 should also realise the development needs within the borough when considering environmental impacts of new development, as provided within national planning policy. Specifically, Point 2 provides that new development should be designed to "maximise benefits to biodiversity". This is not in conformity with national planning policy, particularly PPS1 where point (v) of paragraph 24 outlines that new development should take account of the effects on the environment as well as the positive effects of development in terms of economic benefits and social well being. Paragraph 28 continues to provide that planning authorities should ensure that sustainable development is planned for in an integrated manner in Councils development plans, giving careful consideration of the interrelationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development. Paragraph 29 of PPS1 states that in some instances, a planning authority may decide when determining an application to give different weight to social, environmental, resource or economic considerations. Effectively, new development should balance and give more or less weight to different objectives. Therefore in terms of Policy CS4, it should acknowledge that the impact of new development should be considered in a balanced manner integrating which seeks to achieve outcomes enabling social, environmental and economic objectives collectively.</p>
Changes to be consistent	<p>Point 2 should be reworded, taking out the phrase "maximise" when considering the benefits to biodiversity and should encourage the balancing of the needs of the population and development with the protection of the natural environment.</p>

Attached documents

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/10
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	This Policy is not effective. Persimmon Homes do not consider that promoting native tree planting is a valid Policy requirement, in a Policy which seeks to enhance bio-diversity. It is more important that bio-diversity is achieved and enhanced in the most appropriate way which maybe achieved by native, or non-native species. In addition, there maybe instances where it is better to remove a hedgerow, or tree, which does not make a positive contribution and as well as referring to incorporating, safeguarding, enhancing and adding to, the Policy should also specifically allow replacement.

Changes to be effective	The Policy should also specifically allow replacement of a hedgerow or tree.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/6
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Woodland Trust

Respondent Name	Woodland Trust
Comment ID	3326881/CSPV/2
Respondent Organisation	Woodland Trust
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent	CS4: Nature conservation Whilst we are pleased to see paragraph 3: 'seeking to protect..ancient woodlands and veteran trees', the use of the word seeking does not provide the absolute protection of ancient woodland and ancient trees that is required under

<p>with national policy</p>	<p>national policy. Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full statutory protection: for instance 86% of ancient woodland in the South West has no statutory protection. · Planning Policy Statement 9 on Biodiversity and Geological Conservation clearly states: " Ancient woodland is a valuable biodiversity resource both for the diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as an SSSI). They should not grant planning permission for any developments that would result in its loss or deterioration...Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Planning authorities should encourage the conservation of such trees as part of development proposals." (ODPM, PPS9, 2005, paragraph 10). · Under section 74 of the Countryside and Rights of Way Act 2000, the Government has a statutory duty to publish lists of priority conservation habitats. Under section 40 of the Natural Environment and Rural Communities Act 2006, all public authorities now have a statutory duty to conserve biodiversity. The UK BAPtargets includes a new Habitat Action Plan for Native Woodland which specifies a clear 'maintenance' target of no more loss of ancient woodland - http://www.ukbap.org.uk/BAPGroupPage.aspx?id=98. It is therefore axiomatic that North Somerset Council has a statutory obligation to protect ancient woodland.</p>
<p>Changes to be consistent</p>	<p>We note the comment in the supporting text that: 'Policy CS4 recognises the importance of locations supporting priority habitats, and also networks of habitats, designated or not, ancient woodlands and veteran trees' but the policy as written does NOT currently provide absolute protection for ancient woodland and trees, by caveating their protection by way of the use of the word seek. For these reasons the Trust believes ancient woodland and ancient/veteran trees must be given absolute protection in this Core Strategy. We would therefore like to see paragraph 3 of Policy CS4 amended to read: 'The biodiversity of North Somerset will be maintained and enhanced by:.... protecting, connecting and enhancing important habitats, particularly designated sites, ancient woodlands and veteran trees'.</p>
<p>Attached documents</p>	

Section CS5

Respondent Clevedon town Council

Respondent Name	Clevedon town Council
Comment ID	4565185/CSPV/1
Respondent Organisation	Clevedon Town Council
Do you consider this part of the Core Strategy to be sound?	
Not justified	
Changes to be justified	3.83 - The listing should include Clevedon Pier a grade 1 listed building 3.83 - Clevedon Hall should be included
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/7
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes

Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS6

Respondent Alfred Hill

Respondent Name	Alfred Hill
Comment ID	4603809/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No

Not justified	<p>Green Belts are intended to be permanent, though in practice they have to be reviewed periodically to meet necessary development needs. At present the terms of reference for the review of inner boundaries of the Green Belt in particular are very narrow. Amendments to the general extent of the Green Belt are only proposed to accommodate the urban extensions identified in the RSS. We think that this approach needs to be modified for the following reasons: 1. The opportunity to review Green Belt boundaries should be extended to include removal of land from the Green Belt for non-strategic urban extensions and small scale extensions to village boundaries for development aimed at local needs; 2. The scope for local planning authorities to make non-strategic changes to Green Belt boundaries is unclear; 3. No attention has been given to development requirements beyond the 2026 end-date of the RSS and LDF. There was quite a lot of debate around these issues at the RSS Examination in Public and it is quite possible that the Panel Report and, subsequently, the Proposed Modifications to the RSS will address them. If so, the Council needs to consider the implications. We have two complimentary sets of proposals which address short term and long term Green Belt boundary issues, but which, we submit, need to be considered now and reflected in the Core Strategy and subsequent LDF documents. These are set out in the site specific proposals in the attached document.</p>
Changes to be justified	<p>In summary, we support the designation of Easton-in-Gordano/Pill as a Service village. This should carry with it the expectation that small scale housing development, including a proportion of affordable housing should be provided there. We propose non-strategic releases from Green Belt at Overhill Farm, Pill for residential development and at Portbury for motorway related retail and leisure. We propose the release of a large area of land from the Green Belt south of Easton-in-Gordano, Pill and Ham Green, which should be designated as "white land" and considered to meet the future development needs of Bristol beyond 2026.</p>
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents[Mr A Hill response.pdf](#) (1.9Mb)**Respondent** Alvis Brothers Ltd

Respondent Name	Alvis Brothers Ltd
Comment ID	1051585/CSPV/1
Respondent Organisation	Alvis Brothers Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Green Belts are intended to be permanent, though in practice they have to be reviewed periodically to meet necessary development needs. At present the terms of reference for the review of inner boundaries of the Green Belt in particular are very narrow. Amendments to the general extent of the Green Belt are only proposed to accommodate the urban extensions identified in the RSS. We think that this approach needs to be modified for the following reasons: 1. The opportunity to review Green Belt boundaries should be extended to include removal of land from the Green Belt for non-strategic urban extensions and small scale extensions to village boundaries for development aimed at local needs; 2. The scope for local planning authorities to make non-strategic changes to Green Belt boundaries is unclear; 3. No attention has been given to development requirements beyond the 2026 end-date of the RSS and LDF. There was quite a lot of debate around these issues at the RSS Examination in Public and it is quite possible that the Panel Report and, subsequently, the Proposed Modifications to the RSS will address them. If so, the Council needs to consider the implications. We have two complimentary sets of proposals which address short term and long term Green</p>

	Belt boundary issues, but which, we submit, need to be considered now and reflected in the Core Strategy and subsequent LDF documents. These are set out in the site specific proposals in the attached document.
Changes to be justified	In summary, we support the designation of Easton-in-Gordano/Pill, including Ham Green, as a Service village. This should carry with it the expectation that small scale housing development, including a proportion of affordable housing should be provided there. We propose a non-strategic release from Green Belt at St Catherines, Ham Green, for residential development. We propose the release of a large area of land from the Green Belt south of Easton-in- Gordano, Pill and Ham Green, which should be designated as "white land" and considered to meet the future development needs of Bristol beyond 2026.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Alvis Brothers Ltd response.pdf (1.7Mb)

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/1

Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Policy is unsound as it fails to take account of the justifiable alterations to the GB that are required due to demonstrable housing need and which can only be met through a new urban extension to the SW of Bristol, at Ashton Park. The Baker Associates submission App1 sets out the background to the changes necessary to the GB. The review of GB is part of the current Development Plan , formerly RPG 10 , and has been subject to detailed assessment, including public inquiry as part of RSS 10. Conclusions from that work, including evidence from NSC, formed part of the Core Strategy Options in 2007, and other stakeholder events, has confirmed that exceptional circumstances may exist to warrant alteration to the GB. That exceptional circumstances exist today, should come as no surprise given that the need to provide more housing within North Somerset in the most sustainable locations alongside the conurbation of Bristol, was a clear strategic objective in 2001 within RPG 10. Given that RSS 10, which is now unlikely to be adopted, was intended to provide the necessary strategic alterations to the Green Belt, it now falls on this CS to address this issue, both in terms of strategic alterations of GB and to establish a clear new GB boundary involving alterations to the Proposals Map. The evidence and justification for the strategic alteration SW of Bristol is robust and based upon credible evidence, but not accepted by NS. Evidence will be drawn from the RSS, the CS Options the submissions by BA App1 which are in the public domain and by the Councils studies App 2. Given the demonstrable need for homes and the evident limitations and constraints placed upon the options selected by NS, the CS and a lack of alteration of the GB is not justified. NS have not demonstrated better reasonable alternatives. Need to make changes to Proposals Map. Changes now will set long term context to 2026 recognising permanence of GB. Subsequent changes through Allocations DPD.</p>
Changes to be justified	Please see attached form.
Not effective	Please see attached form.

Changes to be effective	Please see attached form.
Not consistent with national policy	Please see attached form.
Changes to be consistent	Policy CS 6 shall be amended by the deletion of the words in the first sentence : " the boundaries of " and "remain unchanged during the plan period " and the insertion of the following at the end of the sentence " be altered to accommodate the planned urban extension to the south west of Bristol at Ashton Park. In addition , the second sentence shall be altered as follows: insert the words "detailed boundary of the " before Green Belt and Insert the words " and for any further expansion of Ashton Park" after Bristol Airport . Existing and revised wording: CS6: North Somerset's Green Belt Within North Somerset the boundaries of the Bristol - Bath Green Belt will remain unchanged during the plan period be altered to accommodate the planned urban extension to the south west of Bristol at Ashton Park . Further amendments to the detailed boundary of the Green Belt at Bristol Airport and for any further expansion of Ashton Park will only be considered once long-term development needs have been identified and exceptional circumstances demonstrated.
Attached documents	Ashton Park response CS6.doc (89Kb)

Respondent Bristol Airport

Respondent Name	Bristol Airport
Comment ID	1051265/CSPV/1
Respondent Organisation	Bristol International Airport

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	<p>Policy CS6 identifies that there will be no change to the Green Belt within North Somerset within the plan period. Whilst Bristol Airport recognises the important role the Green Belt plays within the District, we consider that there is a strong case for a local amendment to be made to the Green Belt around the Airport to reflect the current planning permission. We consider that the existing inset area should be extended to include the land to the south of the airfield given it now has the benefit of planning permission. Considering the significant amount of evidence demonstrating the longer term development needs of Bristol Airport and the fact that both the Bristol Airport Master Plan and the Air Transport White Paper were considered by the RSS Panel, it is clear that an amendment to the Green Belt would not be premature, as suggested in paragraph 3.97 of the Publication version. On the contrary, without proposing an amendment to the Green Belt to support the Air Transport White Paper and in light of the planning permission for the expansion of the airport, the Core Strategy runs the risk of being found unsound as it fails to comply with national policy and is not based on up to date information. See full representation attached for detail comments.</p>
Changes to be consistent	<p>Recommended changes to Policy CS6: Within North Somerset the boundaries of the Bristol - Bath Green Belt will remain unchanged during the plan period. At Bristol Airport a local amendment to the existing Green Belt Inset Area, reflecting the planning permission for the expansion of the Airport will be made. The detailed boundary will be defined in a subsequent development planning document.</p>

Attached documents[Bristol Airport response.doc](#) (60Kb)**Respondent Bristol Water plc - Turley Associates**

Respondent Name	Bristol Water plc - Turley Associates
Comment ID	4002849/CSPV/3
Respondent Organisation	Turley Associates
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	Policy CS6, paragraph 3.95, states that there will be no need for further revisions to the 'general extent' or 'detailed boundaries' of the Greenbelt. Whilst the LPA has the powers to seek to preserve the Greenbelt in principle, we consider that any Greenbelt strategy should be worded so as to be flexible enough to accommodate appropriate development in accordance with PPG2. We would welcome the addition of a sentence at paragraph 3.99 to explain this point.

Changes to be consistent	We consider that any Greenbelt strategy should be worded so as to be flexible enough to accommodate appropriate development in accordance with PPG2. We would welcome the addition of a sentence at paragraph 3.99 to explain this point.
Attached documents	Bristol Water response by Turley Associates.pdf (260Kb)

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/6
Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	CPRE supports the general constraints on Green Belt but considers this is not demonstrated in the references to Bristol Airport's need for economic growth. The airport's situation in Green Belt and the countryside location for car parking is damaging to the landscape. Public transport to and from the airport is limited in relation to the volume of travellers. It is not consistent with the North Somerset Vision to have surface car green field parking in Green Belt. This comment also relates to Vision 1 and Priority Objective 7.
Changes to be justified	Exceptional circumstances should take account of landscape. North Somerset Council has confirmed the value of Green Belt and its importance to residents of North Somerset. All further encroachments into Green Belt by Bristol Airport should be limited to land north of airport and development should maximise its use by good design and respect for the landscape.

Not effective	Proposals do not focus on the maximum use of inset land to the north of the airport. CPRE have always supported North Somerset Policy T/12 - off-site car parking. The constraint on the use of other land including Green Belt for airport car parking, outside the airport development boundary should continue to be resisted. Green Belt and green field car parking sites outside the airport development boundary incur additional traffic often on unsuitable roads.
Changes to be effective	To enable the Core Strategy to be effective, planning approval should take account of Green Belt and the value of green fields and enforcement should be rigorous and effective. This applies to all planning including the damaging landscape impacts of containers 'parked' in Green Belt and open countryside. Public transport should provide a 'real' alternative to reduce the need for car use.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Edwards

Respondent Name	Edwards
Comment ID	998977/CSPV/1
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	

Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Home Builders Federation Ltd

Respondent Name	Home Builders Federation Ltd
Comment ID	2549089/CSPV/4
Respondent Organisation	Home Builders Federation Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	In light of the proposed reductions in the housing numbers that are currently being considered elsewhere in the West of England area, especially the reductions currently under examination in Bristol City, it would be premature to discount altogether the possibility that expansion into North Somerset's Green Belt at some point over the plan period might need to be considered to cope with Bristol City's outflow. The potential impact that the significant reductions in housing numbers that Bristol City and Bath and

	<p>North East Somerset Council are currently considering may have on the adjoining authorities and the likelihood that the trend for households to seek to address their housing needs without Bristol City's boundaries will add significant household pressure in North Somerset. If the district is to alleviate commuting pressure and reduce competition from new incoming households for what will be a scarce housing stock in Weston-super-Mare, Clevedon and elsewhere in the district, then the most sensible option would be to collaborate with Bristol City Council over plans for extensions to the City as originally proposed by the South West RSS Proposed Changes 2008. It is unclear to what extent the local authorities that make up the West of England Housing Market Area (an entity that is recognised by the newly formed Local Enterprise Partnership) have discussed the implications of the proposed reductions in the area's housing requirements and the impact this may have on local housing markets and demand. Consequently, it would be unsound to abandon plans to review Green Belt boundaries and plan to provide new settlements on the edges of Bristol City.</p>
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Leigh Woods Society

Respondent Name	Leigh Woods Society
Comment ID	1046529/CSPV/2
Respondent Organisation	Leigh Woods Society
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Long Ashton Parish Council

Respondent Name	Long Ashton Parish Council
Comment ID	1014881/CSPV/1
Respondent Organisation	Long Ashton Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Milward

Respondent Name	Milward
Comment ID	4602881/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	The proposal to consider permitting further incursion into the green belt by Bristol Airport is not consistent with section 40 of the Natural Environment and Rural Communities Act 2006, which confers a statutory duty on all public authorities to protect biodiversity. Further 'creep' by Bristol Airport into the green belt will bring airport and vehicle activity closer to the irreplaceable semi natural habitat of ancient woodland in the Kings Wood and Goblin Combe SSSIs and the Avon & Mendip Bats SAC. Until ecological monitoring of the effect of noise, light pollution and general disturbance on these nearby habitats and species has clearly disproved any harmful effect, no further expansion of the Airport into the adjacent green belt should be permitted.
Changes to be consistent	The reference permitting consideration of expansion of Bristol Airport into the green belt should be deleted.
Attached documents	

Respondent Nailsea Town Council

Respondent Name	Nailsea Town Council
Comment ID	706241/CSPV/1
Respondent Organisation	Nailsea Town Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Nailsea Town Council believes that Policy CS6: North Somerset's Green Belt is not based on a credible evidence base and reasonable alternatives have not been considered. North Somerset Council has not carried out a green belt review for the whole of

	<p>the district's green belt. The Town Council argues that a comprehensive review should be carried out. This would allow for the consideration of reasonable alternatives. The policy also closes the door on potentially sustainable and suitable sites which are currently in the green belt becoming available through the Sites Allocations DPD process. A proper review and identification through the Sites Allocations DPD process should consider whether any land should be taken out of or put into the the green belt. Green belt boundary alterations may be needed if long-term sustainable development in Nailsea is to be achieved. It remains the view of the Town Council that in some areas of the town the green belt should be extended, whilst in others the release of some land from the green belt would enable the priorities of both the Town and District Councils to be achieved in a sustainable manner. The Parish Plan demonstrates that, , it is projected that the population of Nailsea will slowly decrease over the next decadesand the average age of the population will rise . A slow decline in population would have detrimental consequences on the provision of services. The Town Council therefore supports a policy of limited growth, sufficient to maintain a balanced population age structure, stable in size. However, the town is unlikely to achieve limited growth without suitable sites being allocated. In order to allow for limited growth, some relaxation of the green belt to the north of the town may be required. The Town Council also fully supports the principle of separating communities with green belt land and a review of the green belt to the south and west of Nailsea is also necessary</p>
<p>Changes to be justified</p>	<p>A robust and detailed review of the green belt boundary around the town and amend the boundary to enable the sustainable future of the settlement. The review would both allow for land to be put into the green belt, the development of which would be unsustainable, and land to be taken out of the green belt, which would allow for sustainable development and the sustainable growth of the town In the absence of such a green belt review the Town Council would suggest that the text deleted from Policy CS6 in the Core Strategy Consultation draft be reinstated. This paragraph reads: "Only in exceptional circumstances where there is an overriding need to accommodate what would otherwise be inappropriate development which cannot be met elsewhere and where green belt land offers the most sustainable option, will land be taken out of the green belt through an appropriate local review and identified through a Local Development Document." The Town Council also wishes to see the insertion of following phrase at the end of the above paragraph: "The local review will also add land to the green belt, the development of which could otherwise lead to the merging of neighbouring towns and the encroachment of the countryside." This would allow the emerging Sites Allocations DPD to consider sites currently within the green belt as was envisaged by the District Council at the time of their consultation document. It would also allow for appropriate land to be included within the green belt.</p>
<p>Not effective</p>	<p>Nailsea Town Council considers Policy CS6 to be unsound because it is neither deliverable nor flexible.The Parish Plan demonstrates that, , it is projected that the population of Nailsea will slowly decrease over the next decadesand the average age of the population will rise . A slow decline in population would have detrimental consequences on the provision of services Policy</p>

	<p>CS6 is highly inflexible in that it fixes the green belt boundary around Nailsea for the next 20 years without the opportunity for review. The consequences of this would be to prevent the potential for appropriate and limited growth and development such as employment use. authorities to critically review the green belt, also requires local authorities to remove land from the green belt for development if, on balance, this would provide the most sustainable solution for accommodating future development requirements; and include additional land within the green belt where clearly necessary for the purposes set out in PPG2. Policy CS6 does not conform with RPG Policy SS4 as it does not allow flexibility for North Somerset to critically review the green belt. The policy is inflexible and cannot be defined as effective. It is therefore unsound.</p>
Changes to be effective	<p>A robust and detailed review of the green belt boundary around the town and amend the boundary to enable the sustainable future of the settlement. The review would both allow for land to be put into the green belt, the development of which would be unsustainable, and land to be taken out of the green belt, which would allow for sustainable development and the sustainable growth of the town In the absence of such a green belt review the Town Council would suggest that the text deleted from Policy CS6 in the Core Strategy Consultation draft be reinstated. This paragraph reads: "Only in exceptional circumstances where there is an overriding need to accommodate what would otherwise be inappropriate development which cannot be met elsewhere and where green belt land offers the most sustainable option, will land be taken out of the green belt through an appropriate local review and identified through a Local Development Document." The Town Council also wishes to see the insertion of following phrase at the end of the above paragraph: "The local review will also add land to the green belt, the development of which could otherwise lead to the merging of neighbouring towns and the encroachment of the countryside." This would allow the emerging Sites Allocations DPD to consider sites currently within the green belt as was envisaged by the District Council at the time of their consultation document. It would also allow for appropriate land to be included within the green belt.</p>
Not consistent with national policy	
Changes to be consistent	
Attached documents	<p>CS6 response Nailsea Town Council (65Kb) Nailsea Town Council Baseline Review.pdf (1.3Mb)</p>

[Nailsea Parish Plan Executive Summary.pdf](#) (106Kb)
[Nailsea Parish Plan Policy Statements.pdf](#) (66Kb)
[Towards the Nailsea Parish Plan.pdf](#) (908Kb)

Respondent Natural England

Respondent Name	Natural England
Comment ID	2862209/CSPV/5
Respondent Organisation	Natural England
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Parish Councils Airport Association (Burn)

Respondent Name Parish Councils Airport Association (Burn)

Comment ID	1010593/CSPV/5
Respondent Organisation	Parish Councils Airport Association
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy does not take account of car parking data from other airports. BA will have 2000 spaces per mppa compared with Stansted (1,700), Manchester (622), Heathrow (511) and much lower figures at overseas airports, including Hong Kong (146). Generous allowance at BA will do little to encourage use of public transport. The offsite car parking policy is acceptable to PCAA but the use by BA of green belt space for car parking is unacceptable, especially when other offsite locations have been turned down for green belt reasons. BA has no superior right to use green belt land. (3.293) This comment also relates to Vision 1 and Priority Objective 7.
Changes to be justified	No further encroachment onto the Green Belt for car parking should be allowed as it will undermine moves towards making the airport more sustainable through increased use of public transport. Greenhouse gases from increased journey to and from the airport will rise. It should be clear in the Strategy that BA cannot access more green belt land just because it is a more cost-effective option for them, in comparison to further multi-storey capacity on the North inset. Exceptional circumstances should be much more demanding.
Not effective	The Core Strategy should be more demanding on the use of public transport so that pressure reduces on both car parking and green belt. The PCAA has previously supported NSC policy T/12 on off-site car parking. If Bristol Airport is allowed to expand further on to Green Belt land, we would consider this unacceptable as it would put the airport in a near monopoly position.
Changes to be effective	North Somerset Council must promote and adhere to its own policies on sustainability in order that public transport increases and no further encroachment of the Green Belt is required.
Not consistent	

with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/11
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	

Not effective	This Policy is not effective. Persimmon support the function of the green belt, but consider green belt aims do not require the general area to remain absolutely unchanged. Small scale changes which help deliver sustainable solutions to meeting development requirements and support the viability of settlement should be capable of being considered. Priority Objective 1 is to deliver sustainable development and Objective 7 is to support the green belt "in order to prevent the sprawl of Bristol and its encroachment into valued countryside and to preserve the character of existing settlements and protect strategic gaps and characteristic green spaces". None of those aims would be compromised by limited small scale extensions at green belt settlements, where boundary anomalies which have not previously been addressed are evident.
Changes to be effective	Small scale changes which help deliver sustainable solutions to meeting development requirements and support the viability of settlement should be capable of being considered.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/8
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes

Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent The Bristol Port Company

Respondent Name	The Bristol Port Company
Comment ID	1025793/CSPV/5
Respondent Organisation	The Bristol Port Company
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Lack of internal consistency in the Core Strategy i.e. "soundness". This relates to several aspects of "Visions" and Policies. If the laudable aim is to make Portishead (and other settlements) more self-sufficient and sustainable The Core Strategy needs to demonstrate that: <ul style="list-style-type: none"> · Green Belt Strict adherence could be counter-productive given the commitment to retain it unchanged over the

	<p>next 15 years to 2026. There should be recognition that the self sufficiency of Portishead and the acknowledged importance of the Bristol Port, and Royal Portbury Dock (RPD), to the West of England economy might well require some adjustment to the Green Belt boundary over the plan period. (See below.) Noted that Bristol Airport has a position in Green Belt policy terms, whereby there is the potential to relax the policy when justified, and this approach should also apply to Bristol Port and in particular (RPD). Welcome support for RPD but need to accept that over 15 year period there may be a requirement to relax part of Green Belt. (The recommendation of the Local Plan Inspector supported by Council Officers only failed to find full acceptance because of local public opposition. The land removed from the Green Belt and then reinstated could become a requirement in due course.) Whilst the major growth is likely at Avonmouth over the next 10 years the fact that RPD is a modern port facility and Bristol Port is a "general/multi-purpose" port means that RPD will continue to have an important role going forward.</p>
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Wraxall & Failand Parish Council

Respondent Name	Wraxall & Failand Parish Council
Comment ID	1189921/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS7

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/12
Respondent Organisation	Persimmon Homes

Do you consider this part of the Core Strategy to be sound?	No
Not justified	This Policy is not justified. The Policy approach to new housing set out in the Policy is to facilitate "easy and efficient waste collection" for example, through collection points. There is no further justification for this in the supporting paragraphs. It is important that if this is a requirement for new development, it clearly accords with the Council's Waste Collection Policy. For example, will the Council pursue a Policy of specific collection points in existing residential areas? It is inappropriate to require new development to contribute to facilities that are not available elsewhere.
Changes to be justified	-
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS8

Respondent Coal Authority

Respondent Name	Coal Authority
Comment ID	928833/CSPV/2
Respondent Organisation	The Coal Authority
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with	The Coal Authority supports the intention to protect mineral resources and to define Mineral Safeguarding Areas for this purpose within the subsequent Site Allocations DPD. However, in order to assist in interpreting and understanding the Core Strategy, the general extent of the MSAs are supposed to be shown on the Key Diagram, the Core Strategy does not do this yet. In order to

national policy	overcome this deficiency and to make the plan sound by compliance with national policy in MPS1, it is suggested that the general mineral resources are shown on an appropriate illustration within the Plan to allow the plan user to be given some guidance as to where the MSAs are likely to be defined at a later stage. Reason - To meet the requirements of paragraph 13 of MPS1 (Planning & Minerals) See supporting documents for full response.
Changes to be consistent	For the purposes of the Core Strategy, The Coal Authority considers that reference should be made within the supporting text to the existence and general extent of the surface coal resource within the North Somerset area which is now done in paragraph 3.130. However a slight correction to terminology is suggested as follows: "Coal 3.130 The Coal Authority has identified the Surface Coal Resource Areas within North Somerset, which comprise coal resources which they feel may be capable of being mined from the surface. The areas cover the entire settlement of Nailsea and land about 1500m to the south west of it, together with a narrow band of land from Clevedon to Clapton in Gordano, largely following the M5." Such a minor change will ensure consistency in terminology with that utilised in other DPDs across England and national policy.
Attached documents	The Coal Authority response CS8 (27Kb)

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/4
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	No

Not justified	
Changes to be justified	
Not effective	Policy CS8 mentions the active aggregates quarries at Stancombe near Flax Bourton and Durnford near Long Ashton, both of which are close to the Bristol to Taunton railway line. FOSBR (Friends of Suburban Bristol Railways) suggests that, to be effective in addressing the environmental impact of these mineral workings, the Core Strategy and proposed Development Management DPD should consider the possibility of transporting aggregates quarried at these sites by rail.
Changes to be effective	At the end of para. 3.132, add the following: "Consideration will be given to enabling aggregates quarried at Stancombe and Durnford to be transported by rail."
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mineral Products Association

Respondent Name	Mineral Products Association
Comment ID	4594625/CSPV/1
Respondent Organisation	Mineral Products Association

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The policy and supporting text refers to providing for 40% of the 'West of England' apportionment. The sub-regional apportionment of the 2005-2020 Guidelines figure for the South West region, recommended by the Regional Aggregates Working Party in September 2010, includes figures for [former] Avon of 79.1 million tonnes between 2005 and 2020, (equal to 4.9 million tonnes per annum average provision) in which North Somerset and South Gloucestershire are included. In order to ensure that a landbank of at least 10 years is maintained, the provision to which the landbank relates must be quantified. The Core Strategy does not identify and delineate a Mineral Safeguarding Area, necessary to ensure mineral resources are not needlessly sterilised (MPS1)No quantification of provision for crushed rock and therefore provides no certainty, and cannot be monitored (including in terms of maintaining a landbank of at least 10 years of permitted reserves).
Changes to be effective	Clarification and quantification of the amount (million tonnes; million tonnes per annum) of crushed rock that will be provided for, relating to the advice from the South West Regional Aggregates Working Party advice on sub-regional apportionment (relating to [former] Avon). Applying 40% to the annual provision in the RAWP advice would equal 1.98 million tonnes per annum. This should then be applied over the period of the Core Strategy (to 2026) with provision made to ensure a landbank of at least 10 years at the end of the Core Strategy period. This is necessary to provide clarity and enable monitoring, including of landbank. Identify the Mineral Safeguarding Area - this is not site specific and so is appropriate for the Core Strategy, and necessary to ensure non-minerals development does not needlessly sterilise resources.
Not consistent with	Mineral Safeguarding Area not identified (MPS1) Lack of quantification (million tonnes; million tonnes per annum) of provision means that monitoring, including of landbank, not possible (MPS1)

national policy	
Changes to be consistent	Quantify amount of rock to be provided for (million tonnes; million tonnes per annum) Identification of Mineral Safeguarding Area Clarification of text to refer to the regional apportionments in the Regional and National Guidelines 2005-2020 (for South West England) and the advice from the RAWP as it applies to [former] Avon including North Somerset including showing calculation of the amount of rock to be provided for in policy CS8
Attached documents	

Respondent South West Transport Network

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/1
Respondent Organisation	South West Transport Network
Do you consider this part of the Core Strategy to be sound?	No
Not justified	3.115 lists 3 main active quarries in North Somerset and West of England Partnership area but makes no reference to rail/freight access.
Changes to be justified	The Policy lack details of transport access and the need to move aggregates by other than the road network.
Not effective	The mineral planing policy fails to take account of access by rail/freight movements.
Changes to be effective	Mineral planning policy that takes account of the need to reduce access to the road network similar to Somerset County Council.
Not consistent with national policy	Sustainable Transport White Paper of the coalition government.

Changes to be consistent	Does not take account of the Government Sustainable Transport White paper.
Attached documents	

Respondent Tarmac Limited

Respondent Name	Tarmac Limited
Comment ID	4579873/CSPV/1
Respondent Organisation	Tarmac Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent	Making a contribution 'towards' the sub-regional apportionment is not in accord with MPS1. North Somerset has an obligation to meet the apportionment unless there are particular circumstances that prevail which prevent this from occurring. It is not clear

with national policy	what is proposed for the period beyond 2020. Whilst the sub-regional apportionment referred to extends to 2020 the Core Strategy continues to 2026 and therefore there must be a commitment to contributing to the West of England's crushed rock apportionment throughout the entire period of the Core Strategy. It should be made clear that a land bank will be maintained throughout the period of the Core Strategy including a full land bank of at least 10 years at the end of 2026.
Changes to be consistent	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 at the end, ie a land bank of at least 10 years should be in place at the end of 2026.
Attached documents	North Somerset Core Strategy Publication Version Consultation (19Kb)

Section CS9

Respondent Banwell Parish Council

Respondent Name	Banwell Parish Council
Comment ID	3984769/CSPV/2
Respondent Organisation	Banwell Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bristol Water plc - Turley Associates

Respondent Name	Bristol Water plc - Turley Associates
Comment ID	4002849/CSPV/9
Respondent Organisation	Turley Associates
Do you consider this part of the Core Strategy to be sound?	
Not justified	In respect of existing reservoirs (within North Somerset's administrative area), Bristol Water Plc is responsible for three operational raw water reservoirs known respectively as Barrow Reservoir no.s 1, 2 and 3. The operational value of these reservoirs for water storage is of prime importance, as this is their main function. We note that this is now referenced at paragraph 3.138 of the Core Strategy: "Attenuation ponds and other sustainable drainage systems, together with larger water bodies, are also valuable aspects of green infrastructure, often having great ecological and landscape value, recreational and educational benefit. Some large water bodies may be of operational value, for example the Barrow tanks are important for the water supply". Any future development that may arise within the vicinity of the tanks will need to be considered in light of operational requirements (and any dramatic increase in population in the locality could increase the 'risk classification' of the reservoirs, requiring significant and costly upgrade works to be undertaken).

Changes to be justified	Any future development that may arise within the vicinity of the tanks will need to be considered in light of operational requirements (and any dramatic increase in population in the locality could increase the 'risk classification' of the reservoirs, requiring significant and costly upgrade works to be undertaken).
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Bristol Water Reqs (260Kb)

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/5
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this	No

part of the Core Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	FOSBR (Friends of Suburban Bristol Railways) urges that disused railway corridors should be protected so that they can be used as cycle tracks. The disused lines between Yatton and Clevedon, Congresbury and Blagdon, and Yatton and Winscombe are currently protected in Policy T/8 of the Replacement Local Plan. We believe that, for this policy to be effective, equivalent protection should be included in CS9 and in the planned Green Infrastructure Strategy.
Changes to be effective	We suggest the addition of a new bullet point to Policy CS9, as follows: "the protection of disused railway corridors for use as cycle tracks".
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Natural England

Respondent Name	Natural England
Comment ID	2862209/CSPV/6

Respondent Organisation	Natural England
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/13
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No

Not justified	This Policy is not justified or effective. Policy CS9 is unclear. Firstly, it requires the protection of wildlife sites. Neither the Policy, nor supporting paragraphs define "wildlife sites". Does the Policy apply to designated sites, undesignated sites, or both? Secondly, the last bullet point requires provision of strategically significant green spaces in all areas of development. It is not clear how small developments will be able to provide strategic green spaces. Will smaller developments be expected to make financial contribution to off site strategic green spaces? This will be an issue in Weston-super-Mare where significant strategic green space is only likely to be capable of being provided in Weston Villages.
Changes to be justified	-
Not effective	This Policy is not justified or effective. Policy CS9 is unclear. Firstly, it requires the protection of wildlife sites. Neither the Policy, nor supporting paragraphs define "wildlife sites". Does the Policy apply to designated sites, undesignated sites, or both? Secondly, the last bullet point requires provision of strategically significant green spaces in all areas of development. It is not clear how small developments will be able to provide strategic green spaces. Will smaller developments be expected to make financial contribution to off site strategic green spaces? This will be an issue in Weston-super-Mare where significant strategic green space is only likely to be capable of being provided in Weston Villages.
Changes to be effective	-
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/9
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/5
Respondent Organisation	-
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	We understand that the Council wants to retain the best quality green infrastructure in the district and enhance it where possible. However, the proposed policy wording is unclear. It states that 'Priority will be given to....!', however the meaning of this word is unclear in development management terms and is likely to lead to confusion and dispute in the planning application process.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West Transport Network

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/2
Respondent Organisation	South West Transport Network

Do you consider this part of the Core Strategy to be sound?	No
Not justified	CS9 fails to take account of the need for green infrastructure of the whole of North Somerset and Greater Bristol West of England Partnership areas.
Changes to be justified	To include West of England Partnership policy within green infrastructure corridor and policy in North Somerset.
Not effective	Because the coalition government supports partnership working at the sub regional and local enterprise partnership level.
Changes to be effective	As above a green infrastructure policy for the Bath/Bristol Weston-super-Mare city region takes account that wildlife do not see local / south Bristol / North Somerset boundaries.
Not consistent with national policy	Lack of joined up sub regional working on wildlife corridors and the
Changes to be consistent	National policy on wildlife corridors does not take account of local government boundaries. The West of England Partnership has a green infrastructure network policy.
Attached documents	

Respondent Woodland Trust

Respondent Name	Woodland Trust
Comment ID	3326881/CSPV/3
Respondent Organisation	Woodland Trust
Do you consider this	Yes

part of the Core Strategy to be sound?	
Not justified	CS9: Green infrastructure We are pleased to support this policy, particularly the 2nd bullet point wording: 'Priority will be given to:.... the protection and planting of trees in woodlands and urban areas, particularly native trees, for public amenity and climate change mitigation and benefits to biodiversity health and recreation'. We also support the 6th bullet point wording: '....the connection of disjointed woodlands, particularly ancient and semi- natural woodland, such as those around the Wraxall/Failand ridge'.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS10

Respondent Banwell Parish Council

Respondent Name	Banwell Parish Council
Comment ID	3984769/CSPV/1
Respondent Organisation	Banwell Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Banwell Parish Council feels that this part of the strategy is unsound as there are no effective measures proposed to address the impacts on Banwell of the additional 5,500 new homes to the west of the village, particularly in terms of the potential large increases in traffic through the village (travelling towards Cheddar, Wells, the A38 and the airport). Whilst a Banwell bypass is referred to, this is a long term goal and unlikely to happen in the foreseeable future. We feel that this is a major shortcoming in the strategy.
Changes to be justified	A commitment given to improvements to the transport infrastructure to mitigate the impact of increased traffic on the village which already suffers major congestion.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents

Respondent Barrow Gurney Parish Council

Respondent Name	Barrow Gurney Parish Council
Comment ID	4618561/CSPV/3
Respondent Organisation	Barrow Gurney Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The CS10: Transportation and Movement bullet points are broadly supported but subject to comments below: The key issue is how the Regional Funding used in the 2009 package is now taken forward, given financial constraints, and possible issues raised by the Localism Bill now before parliament. Item 2 Rapid Transit is supported, but needs to be part of South Bristol Link and extended to Bristol Airport. Item 9 Barrow Gurney Bypass is strongly supported by most of the local communities and has wider benefits for a range of parishes and Bristol Airport. If delayed for financial reasons, there is an immediate need for measures to protect pedestrians, and cyclists and potentially equestrians, also to reduce the volume of traffic close to village housing and environmentally sensitive areas. Similar issues arise through Winford, Chew Magna and elsewhere. This is closely related to CS23: Bristol Airport where proposals are required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure. This is borne out at 3.292 to "enable community expectations to guide the planning process and early stage adoption of an AAP" ie consistent with Localism. (The

	Entec report was factually incorrect and flawed in assessing traffic effects on the community on B3130, hence their conclusion (Vol 10 S8) of "no residual significant effects" was not supported by the data).
Changes to be justified	Errors indicated above need to be corrected and proper weight given to community expectations. Add: Bristol Airport must be seen to meet all conditions relating to surface access and further development at the airport will not be permitted unless the satisfactory resolution of environmental issues has been demonstrated, including the impact of growth on surrounding communities and surface access infrastructure.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Barrow Gurney Parish Council letter CS10 and others (34Kb) Barrow Gurney Parish Council rep CS10 and others (63Kb)

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/8

Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Core Strategy Appendix A, which lists the RLP policies that are to be superseded by the Core Strategy policies does not mention any of the 13 transport policies in the RLP. By inspection of the Core Strategy it is clear that RLP policy T/12 (Bristol Airport) has been replaced by policy CS23 and Policy CS10 replaces some of the other RLP policies. However, it is unclear whether any of the RLP transport policies have been dropped. This comment also relates to Vision 1 and Priority Objective 9.
Changes to be justified	In November 2009 NSC released 'Core Strategy Consultation Draft - Proposed programme for replacement of Adopted North Somerset Replacement Local Plan Policies'. It indicates that all of the RLP policies are to be replaced by policies in the Core Strategy. However it is not clear that this has been achieved.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/6
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	FOSBR (Friends of Suburban Bristol Railways) supports the rail projects mentioned in Policy CS10. We believe that, to be effective, the Weston southern chord should also be included, as in Policy T/1 of the Replacement Local Plan. This would enable a local train service for the whole of the Weston loop, serving a new station near the old airfield, giving more communities access to the rail network and enabling further carbon-reducing modal shift away from the private car.
Changes to be effective	Add as point (18): "Weston southern rail chord."
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Leigh Woods Society

Respondent Name	Leigh Woods Society
Comment ID	1046529/CSPV/3
Respondent Organisation	Leigh Woods Society
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Long Ashton Parish Council

Respondent Name	Long Ashton Parish Council
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Comment ID	1014881/CSPV/7
Respondent Organisation	Long Ashton Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	CS10 Transportation and movement Plans for Barrow Gurney Bypass should be given a high priority together with transport management policies.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent MJR

Respondent Name	MJR
Comment ID	1572161/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	The aim "to encourage alternatives to single occupancy car commuting" is weaker than national policy expressed in PPG13 which is to reduce the need for all car travel.
Changes to be consistent	Replace the word "commuting" with "travel".
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/6
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	

Not effective	<p>Whilst we are in agreement with most of the elements discussed within the bullet points on the first page of the policy, there are several caveats which should be considered to make the policy effective and the most appropriate consideration alternatives.</p> <p>Public Transport: It is agreed that enhanced public transport provision should be a key aim within North Somerset. However, investment should be focussed on delivering improvements which contribute to better linkages within balanced communities across the wider Authority area, rather than measures which could contribute towards existing and future out-commuting.</p> <p>Connectivity between major towns: In line with our comments above, we would support improvements to connectivity by sustainable modes where this is not likely to undermine the viability of existing settlements or the policy aspirations of the Council in terms of containment of employment opportunities. Major Schemes proposed in the Regional Funding Advice of 2009: We are concerned about the proposed Weston Package (Phase 1 low cost option), as we believe that it does not match with the policy aspirations of the Council insofar as it is likely to lead to an increase in car-based out-commuting. This in turn will undermine the Council's desire for increased containment of employment opportunities within Weston-super-Mare. We do, however, support the proposed M5 Junction 21 Bypass / Relief Road. It is our view that the provision of this link will have other key benefits (see full rep below). We also support the provision of a new Park & Ride for Weston-super-Mare. In accordance with best practice, this should be located in a manner which delivers the best benefits for the network by extracting vehicles at the earliest reasonable opportunity. We consider that the policy is not currently likely to manage travel demand and support sustainable growth.</p>
Changes to be effective	<p>Minimisation of measures which would support out-commuting, particularly by non-sustainable modes of transport. Review of the Weston Package Major Scheme proposal to more carefully reflect the need to control out-commuting. Emphasis on the need for a suitably-located Park & Ride facility for Weston-super-Mare, to benefit the widest-possible area of the highway network through the extraction of vehicles at a location away from the town centre. Prioritisation of the M5 Junction 21 Relief Road as requirement to support further development and regeneration in Weston-super-Mare.</p>
Not consistent with national policy	
Changes to be consistent	

Attached documents

[Mead Realisations Ltd response.pdf](#) (282Kb)

Respondent Parish Councils Airport Association (Bradley)

Respondent Name	Parish Councils Airport Association (Bradley)
Comment ID	4601953/CSPV/1
Respondent Organisation	Parish Councils Airport Association
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The key issue is how the Regional Funding used in the 2009 package is now taken forward, given financial constraints, and possible issues raised by the Localism Bill now before parliament and the Climate Change Act. Item 2 The PCAA is disappointed to see that the Bus Rapid Transit Extension link to Bristol Airport for 2026 has not been listed. The PCAA has always maintained in our comments to consultations that the South Bristol Link will only alleviate not resolve surface access issues to the Airport. These comments also relate to Visions 1 and 7, and Priority Objectives 2, 7 and 9. See attached for Item 9.
Changes to be justified	Errors indicated above need to be corrected and proper weight given to community expectations. Bristol Airport must be seen to meet all conditions relating to surface access, set by the recent planning application, for example, 15% of passengers travel to and from the Airport at a throughput of 10 million passengers per annum.
Not effective	The Core Strategy albeit sound in principle may be rendered ineffective by lack of sufficient funding to meet the reasonable needs of communities. These comments also relate to Visions 1 and 7, and Priority Objectives 2, 7 and 9.

Changes to be effective	In order for Vision 1 to be compatible with Vision 7 there is a fundamental need in the planning of Bristol Airport to agree with the affected communities and control the impacts caused on those who live nearby and on the natural environment.
Not consistent with national policy	To meet the current and future expectations of Climate Change and updated Airport Policy and Localism Bill and agree proposals with the local communities directly affected by existing and proposed expansion plans. These comments also relate to Visions 1 and 7, and Priority Objectives 2, 7 and 9.
Changes to be consistent	
Attached documents	CS10 Item 9 response for Parish Councils Airport Assoc.doc (63Kb)

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/14
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No

Not justified	This Policy is not justified and effective. We consider the wording of the second bullet point of the Policy could be better improved to make it more effective by changing "deliver" to "contribute towards better local bus and rail services", as it is unlikely that any one development related transport scheme could deliver improvements on its own. Secondly, we support the last bullet point to improve connectivity within and between major towns, but without proper justification it is not clear how this will be judged against the other Policy Objective of greater self-containment within settlements. Thirdly, transport proposals 7 to 17 are listed as other un-programmed proposals. There is no indication in the Core Strategy of the priorities to be afforded to these schemes. We assume there is no significance in the order of the schemes in the Policy. Will priority be judged in accordance with the Development Strategy of the plan, where development is concentrated in Weston-super-Mare, or will priorities be based on transport impacts of schemes? This needs to be made clear in the document. Finally, a definition of what is meant by larger scale developments in this Policy and its justification needs to be set out.
Changes to be justified	We consider the wording of the second bullet point of the Policy could be better improved to make it more effective by changing "deliver" to "contribute towards better local bus and rail services", as it is unlikely that any one development related transport scheme could deliver improvements on its own. A definition of what is meant by larger scale developments in this Policy and its justification needs to be set out.
Not effective	This Policy is not justified and effective. We consider the wording of the second bullet point of the Policy could be better improved to make it more effective by changing "deliver" to "contribute towards better local bus and rail services", as it is unlikely that any one development related transport scheme could deliver improvements on its own. Secondly, we support the last bullet point to improve connectivity within and between major towns, but without proper justification it is not clear how this will be judged against the other Policy Objective of greater self-containment within settlements. Thirdly, transport proposals 7 to 17 are listed as other un-programmed proposals. There is no indication in the Core Strategy of the priorities to be afforded to these schemes. We assume there is no significance in the order of the schemes in the Policy. Will priority be judged in accordance with the Development Strategy of the plan, where development is concentrated in Weston-super-Mare, or will priorities be based on transport impacts of schemes? This needs to be made clear in the document. Finally, a definition of what is meant by larger scale developments in this Policy and its justification needs to be set out.
Changes to be effective	We consider the wording of the second bullet point of the Policy could be better improved to make it more effective by changing "deliver" to "contribute towards better local bus and rail services", as it is unlikely that any one development related transport scheme could deliver improvements on its own. A definition of what is meant by larger scale developments in this Policy and its justification needs to be set out.

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West Transport Network

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/3
Respondent Organisation	South West Transport Network
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The policy is in need of rewriting due to the withdraw of the regional funding advise 2009. With a need bidding process for the remain infrastructure schemes for the West of England partnership Greater Bristol authorities. Policy needs to take account of new

	government policy on trams light rail and ultra light rail. Fails to update policy on electrification of the London Paddington to Bristol Temple Meads and Cardiff railway line. New policy is required to electrify the Greater Bristol metric network.
Changes to be justified	A number of schemes on the list may be unaffordable at the present time and should they all be included in the list 7 Banwell bypass and Barrow Gurney bypass junction 19 M5? Coalition government policy changes on the use of tramways and ultra light rail for the Rapid Transport policy. The need for a new rail policy and route strategy for Greater Bristol to look at electriying the local train network.
Not effective	The list needs to take account of government funding priorities this may become a wish list. Because it fails to update the strategy on the rapid transit ultra light rail proposals. Because rail policy is being updated by the Department of Transport and government their is a need for a transport partnership or integrated transport authority for Greater Bristol area.
Changes to be effective	A policy that includes more details of bus service improvement rapid transit and Greater Bristol bus network Bristol bus station to Weston via Cleve, Bristol to Clevedon via Tickenham, Bristol to Nailsea, Bristol to Portishead via Pill. The wording bus rapid transit or ultra light rail light rail added to the policy. 2, Ashton Vale Park and Ride and rail station to city centre and Bristol TM Bedminster Bristol TM Parson Street, Ashton Centre, Pill, Portbury, Parkway, Portishead rail line. Rewrite the rail policy including the Portishead rail link as a railway link and not a bus rapid transit route.
Not consistent with national policy	The new transport white paper and the need to improve bus infrasture. New policy on sustainable transport white paper and PPS13. National Transport Policy has been updated and the Core Strategy need update on rail policy and the protection of depot and sidings at Flax Bourton.
Changes to be consistent	A bus policy of services and improvement with the Core Strategy under the Greater Bristol Bus network especially protection of infrastructure from bus rail integration at Weston-super-Mare station/Locking Road coach station, Yatton station, Nailsea and Backwell. The Policy needs updating on electrification of the Intercity line from Bristol Temple Meads to London Paddington and Cardiff central. The need for a electrification study of local rail lines around Bristol city region.
Attached documents	

Respondent The Bristol Port Company

Respondent Name	The Bristol Port Company
Comment ID	1025793/CSPV/3
Respondent Organisation	The Bristol Port Company
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Lack of internal consistency in the Core Strategy i.e. "soundness". This relates to several aspects of "Visions" and Policies. If the laudable aim is to make Portishead (and other settlements) more self-sufficient and sustainable The Core Strategy needs to demonstrate that the proposed aim/policy of re-opening the Portishead to Bristol rail link will not merely encourage greater one-way commuting between the two settlements. This goes to the heart of the case as promoted in Vision 1, Vision 5, Policy CS10 (Transport), Policy CS20 (Employment) CS31 (Portishead). Whilst it is appreciated that the reopened link has long been promised, that it is referred to in transport policies for the West of England, there is no apparent evidence that the commencement of a passenger rail service would not encourage more commuting back to Bristol and undermine the objectives and policies related to self-sufficiency and sustainability.
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Name	The Bristol Port Company
Comment ID	1025793/CSPV/4
Respondent Organisation	The Bristol Port Company
Do you consider this part of the Core Strategy to be sound?	No
Not justified	CS10 Transport Policy makes no reference to freight transport. This is a major omission that also exists in the Joint Transport Plan notwithstanding the freight/logistics industry is an important sector of the economy which the Core Strategy seeks to promote. The policy also makes reference to improvements to Junction19 and the M5 and BPC expects to be consulted on any proposed alterations to this junction.
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS11

Respondent Banwell Parish Council

Respondent Name	Banwell Parish Council
Comment ID	3984769/CSPV/3
Respondent Organisation	Banwell Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Leigh Woods Society

Respondent Name	Leigh Woods Society
Comment ID	1046529/CSPV/4
Respondent Organisation	Leigh Woods Society
Do you consider this part of the Core Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
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Comment ID	1569505/CSPV/10
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West Transport Network

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/4
Respondent Organisation	South West Transport Network
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The parking policy fails to take account of policy on coach parking and express coach service parking in Weston-super-Mare. Fails to take account of future needs of National Express bus policy/Bakers coaches/London Service.
Changes to be justified	A tourist centre like Weston-super-Mare needs to protect its coach station infrastructure at Locking Road.

Not effective	Because the Weston-super-Mare wishes to build on the coach station at Locking Road without a sound coach parking alternative provision district wide.
Changes to be effective	A coach parking policy and coach station policy for Weston-super-Mare at Locking Road and integrated with the railway station.
Not consistent with national policy	PPSB and the government white paper on sustainable transport policy.
Changes to be consistent	Lack of parkign policy for coaches service provision and visiting tourist coaches applies also the Clevedon and Portishead.
Attached documents	

Section CS12

Respondent Leigh Woods Society

Respondent Name	Leigh Woods Society
Comment ID	1046529/CSPV/5
Respondent Organisation	Leigh Woods Society
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/7
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The Policy is general in content and unfocussed. It largely restates national legislative requirements without establishing how these will be carried forward locally. The text in instances holds limited local relevance, is broadly aspirational and offers no conclusion. The Policy includes measures which are imprecise such as the use of design delivery mechanisms, and measures which are not well defined such as the 'use of a robust design process', 'promoting high quality buildings and places', and 'enhancing a sense of place and local identity' resulting in a very generic policy which is not locally defined. In addition to the above, the Policy sets out

	<p>the importance of consolidating the individual character of settlements. It should be recognised within the Policy that this should be achieved where important to do so. In some instances in North Somerset it may not be appropriate or desirable to incorporate local existing local character in new developments and equally the policy should not look to stifle innovative design in new development, particularly when considering sustainable design building techniques and materials. If the intention is to deliver sustainable development, the policy needs to be anchored in a clear set of specific measures. There is no cross reference to other studies (Egan Wheel), to PPS1 supplement, to energy management, to water resources or landscape, or to the wider issue of 'place making' in the public sector that deals with integrated service delivery.</p>
Changes to be effective	<p>The policy needs to be clearer on its function and role, by encouraging the following: Setting out the principles and relating to district wide objectives. Defining specific performance criteria that will deliver relevant design responses. Locally defined benchmarks that will assist early delivery. Recognise local distinctiveness in new development is not always desirable or appropriate in North Somerset. Encourage innovative design particularly with regard to sustainable building techniques.</p>
Not consistent with national policy	
Changes to be consistent	
Attached documents	<p>Mead Realisations Ltd response. (282Kb)</p>

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/15

Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	This Policy is not justified. The Policy and more particularly the supporting paragraphs are confusing and need a clearer justification. The first 2 paragraphs of the Policy set out general design statements which largely repeat guidance in PPS1, which even when replaced by a National Planning Statement, is still likely to be included as National Guidance. Effectively, the Policy is seeking Design and Access Statements for all development, which we support. However, guidance on the preparation of Design and Access Statements in the supporting paragraphs is confused - Paragraph 3.170 requires schemes in Weston-super-Mare to demonstrate exemplar standards without specifying a Design and Access Statement, Paragraph 3.171 requires a Design and Access Statement for schemes in Clevedon, Nailsea and Portishead and Paragraph 3.173 requires all schemes to demonstrate quality and design through a Design and Access Statement. However, Paragraph 3.177 fails to pick this up in monitoring the Policy and instead monitoring is to be on the basis of numbers reaching different levels of the Building for Life Standards, which does not actually form part of this Policy. The Policy does include a requirement for a commitment to designing out crime which we support, but we do not think the Policy should refer to "Secured by Design" which is a specific scheme and removes flexibility in Policy terms as crime reduction can be achieved in other ways.
Changes to be justified	-
Not effective	
Changes to be effective	
Not consistent	

with national policy	
Changes to be consistent	
Attached documents	

Section CS13

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/10
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No

Not justified	The proposed minimum level of supply of housing is too low and is based upon a strategy of not meeting the needs of NS and the sub-region but to avoid at all cost the new settlement at Ashton Park . The evidence in support of increasing the level of housing provision is set out in BA App2 which is attached and should be read alongside this representation.
Changes to be justified	For the reasons given in BA App2 , we suggest that the minimum figure for residential homes is 20,000 and should replace 13400 homes. As follows The text will also require substantive changes . Delivering strong and inclusive communities CS13: Scale of new housing A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 13,400 20,000 dwellings within North Somerset 2006-2026. This policy contributes towards achieving Priority Objective 1.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Baker Family

Respondent Name	Baker Family
Comment ID	4601153/CSPV/1
Respondent Organisation	

Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached.
Changes to be justified	Increase housing requirements to around 24,000 in accordance with the higher UK growth option, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the district in the period to 2026.
Not effective	See attached
Changes to be effective	Increase housing requirements to around 24,000 in accordance with the higher UK growth option, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the district in the period to 2026.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Baker Family Representations (44Kb)

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/4
Respondent Organisation	Bloor Homes

Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Policy CS13 identifies the general housing requirements of the District to 2026, setting out that land will be identified to deliver a minimum of 13,400 new dwellings . This figure is not consistent with paragraph 10 of PPS 3 because it does not take account of the identified need in either the Household Projections 2006 or 2008. Furthermore, the household projections show a trend of increasing demand for households, with the 2006 projections identifying a need for 33,000 new households, whilst the 2008 projections identify a need for an additional 36,000 new households, an increase of nearly 10%. The increase in North Somerset is set against a backdrop of 20,500 fewer households per year being formed in England between 2008 and 2031. The housing needs figure has been derived based on forecast job growth alone but at a lower level than forecast by Oxford Economics Projections. A recognised and accepted forecasting body in terms of forecasting employment trends. Based on the Modified Oxford Central projection, a need for 10,100 jobs is identified. This is then translated into a housing requirement drawing upon the Household Projections 2006 but dismissing the figures based on the net international migration figures being too high due to the impacts of the recession going forward. However, to apply an assumption of zero net migration is considered unfounded and unrealistic to derive the housing need for the district. The Council's approach to the Core Strategy is predicated upon the Household Projections 2006 being irrelevant due to the projections being based on past trends, particularly with regards to migration trends. PPS 3 requires that assessment of future requirements in local strategies should have regard to, amongst other factors, current and future demographic trends and profiles and take into account evidence including the Government's latest published household projections.</p>
Changes to be justified	<p>The deletion of Policy CS13 and it's rewriting on the basis on the need for a minimum of 22,780 homes being provided up to 2026, or the requirement of 36,000 identified in 2008 Household projections. Through this approach the Core Strategy will reflect the guidance set out in PPS 1 and PPS 3 and ensure a sustainable and balanced distribution of housing development, providing for the whole needs of the District.</p>
Not effective	

Changes to be effective	
Not consistent with national policy	Providing for only 41% of the forecast need according to the Household Projections 2006, or for only 37% of the forecast need based on the Household Projections 2008, is not compliant with paragraphs 23, 26 and 32 of PPS1 and paragraphs 32, 33 and 38 of PPS3. Fundamentally, the housing requirement is not consistent with the Household Projections. The impacts of migration cannot be totally dismissed by assuming zero net immigration. The document therefore fails the test of Soundness requiring conformity with national planning policy as set out within PPS12. At the very least the basis of future jobs should be based on the Oxford Economic Central Forecast of 17,000 additional jobs between 2006-2026, or even the Stronger Trend Growth of 21,700 considering the Authority's objective of achieving the employment-led regeneration of the area. Applying the Additional Homes jobs ratio as set out in Appendix 2 of Determining a locally derived District Core Strategy Housing Requirement to 2026, Stage 2 Report of 1.33, this translates into a homes requirement of 22,780 homes based on the Oxford Economic Central Forecast, or a requirement of 28,140 homes based on the Stronger Trend Growth. Therefore, it is considered that a minimum of 22,780 homes should be planned for in the authority, if the household projections are to be dismissed due to the unproven assumption that migration will not continue at the previous rates due to economic recession.
Changes to be consistent	The deletion of Policy CS13 and it's rewriting on the basis on the need for a minimum of 22,780 homes being provided up to 2026, or the requirement of 36,000 identified in 2008 Household projections.
Attached documents	Bloor response CS13 (23Kb)

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/3
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes

Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Childrens Hospice South West c/o David James & Partners

Respondent Name	Childrens Hospice South West c/o David James & Partners
Comment ID	4600961/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached
Changes to be justified	Increase housing requirement to around 24,000 in accordance with the higher UK growth option, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the district to 2026.
Not effective	See attached

Changes to be effective	Increase housing requirement to around 24,000 in accordance with the higher UK growth option, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the district to 2026.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Childrens' Hospice Representations (44Kb)

Respondent Crest Nicholson Plc

Respondent Name	Crest Nicholson Plc
Comment ID	4602465/CSPV/1
Respondent Organisation	Crest Strategic Projects Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The successful challenge by CALA Homes clarified that Regional Spatial Strategies remain for the time being and are retained as part of the decision making process until the Government has introduced a new planning system via the Localism Bill. Whilst the South West Regional Spatial Strategy was not published, it had been subject to significant and lengthy examination and consultation. Furthermore, extensive work had been carried out on the evidence base in relation to growth for the region. The RSS

	<p>should therefore be given significant weight and in particular the housing targets proposed within the RSS. These figures have undergone significant and lengthy examination and therefore should be accorded substantial weight by the Local Authority. The Localism Bill proposes that the responsibility for establishing housing requirements should fall to local councils but that the local housing targets will be tested through the LDF process and therefore councils will need to collect reliable information to justify its proposed housing targets. The advice from the CLG (letter to Chief Planning Officers dated 6th July 2010) states that local authorities may wish to consider reverting to the option 1 figures but in doing so should only do so if it is the right thing to do for their area. Also the local authority should be able to justify and defend the new housing figures. It is therefore concerning to note that North Somerset Council is proposing a level of housing provision that not only does not meet the proposed RSS target, but also is much reduced from the option 1 figure previously proposed (50% lower in total). The Council does not give any sound indication as to why such a reduced number is proposed nor explain why this target has been reduced, even though the latest household projections indicate a far higher increase in households than that which was considered by and was instrumental in the formation of the previous RSS targets.</p>
Changes to be justified	The Council should revert to the RSS target which has been fully justified through an examination in public and is based on sound evidence base.
Not effective	
Changes to be effective	
Not consistent with national policy	The Core Strategy does not comply with the advice in PPS3 in that paragraph 33 requires local authorities to have regard to current and future levels of housing need. in considering their housing requirements they should have regard to the findings of Housing Market Assessments, Strategic Housing Land Availability Studies and the Government's household projections. In this respect the latest household projections indicate a need for 36,000 households over the next 15 years to 2026.
Changes to be consistent	The Core Strategy should be amended to bring the proposed housing target in line with advice contained in PPS3 in respect of having regard to current and future levels of housing need as indicated in the latest Government Household Projections.
Attached documents	

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/1
Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>With a limited housing stock and associated inflated house prices it is evident that affordability of housing restricts existing residents within the North Somerset from entering the private housing market, but importantly, with a comparatively low level of new housing being delivered across North Somerset the levels of affordable housing delivery has also been comparatively low. As such in order to address housing need and to deliver the Council's ambition of rejuvenating the town centre of Nailsea, Gleeson considers that a significant quantum of residential allocations is required. As part of Policy CS13 the Council has reduced the rate of housing delivery from that within the RSS across North Somerset for the plan period to 2026 to 13,400. The proposed changes version of the South West Regional Spatial Strategy had suggested that North Somerset should accommodate 26,760 units across the same period. Accordingly, we are concerned that Policy CS13 will not meet housing demand and housing need across North Somerset during the plan period. A lower allocation could cause a deficiency in housing delivery if suitable land is not identified and allocated from the early stages, and in addition that a range of sizes and locations are also made to ensure delivery of those sites. We are concerned that an over provision of large scale allocations at Weston-Super-Mare could result in a delay in delivery in the short term. Please see attached document for full comment.</p>
Changes to be justified	We suggest that the Council makes provision for non-delivery of existing consents and makes a careful assessment locations and scale of proposed allocations.

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent Highways Agency (R Davies)

Respondent Name	Highways Agency (R Davies)
Comment ID	4603585/CSPV/1
Respondent Organisation	Highways Agency
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	The agency notes the reduction in the proposed level of growth for Weston-super-Mare compared with the consultation draft version published previously. In theory this should produce less growth in traffic and, in turn, less pressure on the safety and efficiency of M5 J21. However, we have not seen any evidence to show what impacts the revised development and its associated traffic would have on the junction and what possible mitigation might be required, other than the identified Weston package which may or may not receive funding. As stated above, we welcome the often repeated reference to employment led development within WsM to redress the imbalance between the available working population and employment opportunities within the town. We note the aim to deliver 1.5 use class jobs per home to support the employment led approach. What remains unclear at this stage is how an employment led strategy will be delivered. we do not readily see the evidence base to demonstrate how this approach will be delivered nor the evidence to show that 1.5 jobs per home is a reasonable expectation. There are no clear policies which will limit the release of housing in line with jobs. In this respect it is not clear that this employment led approach is deliverable and therefore could be unsound. We welcome the commitment that strategic development will not be permitted to the east of the M5 at Weston-super-Mare. Such development would in our view be unsustainable by not being well related to Weston and inconsistent with the stated approach of increasing self-containment. See attached document for the full representation.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents[Highways Agency response.pdf](#) (589Kb)**Respondent Hoddell Associates**

Respondent Name	Hoddell Associates
Comment ID	1055809/CSPV/1
Respondent Organisation	Hoddell Associates
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached.
Changes to be justified	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not effective	See attached.
Changes to be effective	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Hoddell Associates Representations (44Kb)

Respondent Home Builders Federation Ltd

Respondent Name	Home Builders Federation Ltd
Comment ID	2549089/CSPV/5
Respondent Organisation	Home Builders Federation Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>The outcome of the CALA Homes legal challenge has clarified that the Regional Strategies remain for the time being a part of the development plan process. They will, hence, remain a part of the planning decision-making process until the Government's new planning system is introduced via the Localism Bill. Only then will the RSS's be dispensed with as a component of the planning system. Although the South West Regional Spatial Strategy Proposed Changes (2008) was never finally published under the last Government, it had been subject to a lengthy public examination and consultation on the proposed changes. Planning for the low number of homes proposed by the Core Strategy will only contribute to restraining growth that might otherwise have occurred and will increase unemployment in the West of England housing market area. Neglecting the economic dimension and the links with housing would mean attaching little weight to the Government's growth agenda, as set out in the HM Treasury and Department for Business Innovation and Skills document: The Path to Strong, Sustainable and Balanced Growth (HM Treasury/BIS, November 2010). The document cites the need for a planning regime that supports growth and sustainable development and that enables an increased supply of housing to meet the nation's needs. The Council has not produced a compelling case justifying why it is departing from previous evidence that had established a Draft RSS requirement of 26,000 homes for the district - a target that was considered necessary to support the growth ambitions of the City Region as well as meet the needs of the district's people.</p>

Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Leigh Woods Society

Respondent Name	Leigh Woods Society
Comment ID	1046529/CSPV/6
Respondent Organisation	Leigh Woods Society
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Long Ashton Parish Council

Respondent Name	Long Ashton Parish Council
Comment ID	1014881/CSPV/6
Respondent Organisation	Long Ashton Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/8
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS13 indicates a minimum level of residential development which is set significantly below need which is demonstrated through draft RSS and North Somerset Councils evidence base. It is not therefore consistent with national planning policy, in particular PPS3 and is not justified because the evidence base is flawed. See full representation attached for detailed comment.
Changes to be justified	The Core Strategy looks toward providing for at least 17,800 dwellings. However, in order to be able to implement the first part of "plan, monitor and manage", a level similar to the draft RSS should be planned for.
Not effective	
Changes to be effective	
Not consistent with national policy	Policy CS13 indicates a minimum level of residential development which is set significantly below need which is demonstrated through draft RSS and North Somerset Councils evidence base. It is not therefore consistent with national planning policy, in particular PPS3 and is not justified because the evidence base is flawed. See full representation attached for detailed comment.
Changes to be consistent	The Core Strategy looks toward providing for at least 17,800 dwellings. However, in order to be able to implement the first part of "plan, monitor and manage", a level similar to the draft RSS should be planned for.
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/6
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Considerable concern is raised to Policy CS13 which indicates a minimum level of residential development which is set significantly below need which is demonstrated through the Core Strategy evidence base. It is not therefore consistent with national planning policy, in particular PPS3 and is not justified because the evidence base is unsound. North Somerset Council has based the minimum requirement to build 13,400 dwellings between 2006 and 2026 on the findings of a stage 2 report prepared by Keith Woodhead in October 2010. On first examination, the brief provided by North Somerset Council to Mr Woodhead to undertake the Report predetermined the outcome. Secondly, large assumptions were made through the work that is not in line with the wider evidence base. The attached document sets out the detailed representation
Changes to be justified	The Core Strategy has provided for at least 17,800 dwellings. For the reasons set out above this is considered insufficient and a level similar to the draft RSS should be planned for.
Not effective	
Changes to be effective	

Not consistent with national policy	Considerable concern is raised to Policy CS13 which indicates a minimum level of residential development which is set significantly below need which is demonstrated through the Core Strategy evidence base. It is not therefore consistent with national planning policy, in particular PPS3 and is not justified because the evidence base is unsound. North Somerset Council has based the minimum requirement to build 13,400 dwellings between 2006 and 2026 on the findings of a stage 2 report prepared by Keith Woodhead in October 2010. On first examination, the brief provided by North Somerset Council to Mr Woodhead to undertake the Report predetermined the outcome. Secondly, large assumptions were made through the work that is not in line with the wider evidence base. The attached document sets out the detailed representation
Changes to be consistent	The Core Strategy has provided for at least 17,800 dwellings. For the reasons set out above this is considered insufficient and a level similar to the draft RSS should be planned for.
Attached documents	Mr B Hayes response.docx (27Kb)

Respondent Mr D Breeze

Respondent Name	Mr D Breeze
Comment ID	3320065/CSPV/5
Respondent Organisation	CMH Management Limited
Do you consider this part of the Core Strategy to be sound?	No

Not justified	We believe that the Core Strategy is unsound as the assumptions used to justify the proposed housing requirement of 13,400 over the plan period are fundamentally flawed and fail to follow national guidance. Moreover we believe that these are politically driven housing numbers, being lower than even officers calculated projections, which will adversely impact upon the ability of North Somerset to grow and recover from the recent recession and perform its function in the wider West of England region. This lack of new housing supply, being only 50% of the previous emerging RSS figure of 26,750, will in itself deter new and existing businesses from either expanding or relocating to the area, as housing supply constraints on this scale will inevitably lead to higher house prices for some whilst serving to exclude the less well off from accessing decent affordable housing. We believe that this housing requirement totally fails to address the current and worsening chronic shortage of affordable housing in the district and fails to meet local affordable housing needs. Indeed 13,350 fewer homes also means 4,005(30% using the Councils target) fewer affordable homes leading to an exacerbation of the housing shortage for those members of the community most unable to compete for housing in the open market. This will impact greatest in the rural areas and smaller villages such as Cleeve where local people are already unable to compete for open market housing and by virtue of a lack of affordable new homes will be forced to leave the village altogether.
Changes to be justified	The evidential base set out in the Stage 1 and Stage 2 reports needs to take a far more realistic approach to future job creation in the District as modelled by Oxford Economics, and the Council need to adequately explain why they chose to modify the projections and largely discard the past 5 years work undertaken on the RSS. We consider that no credible justification has been given for the use of the lower employment growth figures and therefore the reduction in housing numbers which this employment level can support. Thus we consider it essential that the council completely review this growth assumption and redress the huge discrepancy between robust work which arrived at the RSS figure and their own targets which we believe to be politically motivated.
Not effective	We believe the Core Strategy to be unsound as there will be a huge financial implication for Council Tax payers. In simple financial terms North Somerset is losing out on the funding from the 'New Homes Bonus' that these additional dwellings would have delivered the taxpayers of North Somerset. This reduction will have a direct financial impact on North Somerset Council and we believe that the total 'New Homes Bonus' that could be claimed by North Somerset Council amounts to Â£119,692,000 over 6 years. The Councils Development Contributions tariff currently being proposed would also apply to every one of those 13,350 new homes. This contribution covers infrastructure projects such as, highways improvements, open space, education, social care, etc, etc, etc, and amounts to a further sum of Â£163,257,150. When combined these sums make a grand total of Â£282,949,150 that is proposed to be lost from the local economy.

Changes to be effective	We believe that the Council should increase housing numbers to rebalance growth across the district and place less reliance on a single settlement growth strategy, which would make the strategy more deliverable and flexible.
Not consistent with national policy	The Core Strategy fails to conform with national policy set out in PPS3 and RPG10 and the emerging Regional Spatial Strategy (RSS). We believe that the Core Strategy dismisses the past 5 years work which has been undertaken on the emerging Regional Spatial Strategy (RSS). On November 10th 2010 Mr Justice Sales ruled in the High Court that the Government had acted unlawfully in not putting any transitional arrangements for planning in place, effectively reinstating the RSS as a material consideration. We believe that should the Council take forward the Core Strategy based on the significantly lower housing requirements it proposes it will clearly not be in conformity with the RSS, a document which we have no idea of knowing how long will be in existence.
Changes to be consistent	Housing numbers should not be set based on the "localism " approach, which underpins this methodology of a local employment based growth strategy but must follow the guidelines set out in national guidance. We believe that the Core Strategy should as part of this process review the Green Belt boundaries particularly in relation to the infill villages which are washed over with green belt, as we consider this limits growth to the detriment of meeting local housing needs.
Attached documents	

Respondent Mr J Alderson

Respondent Name	Mr J Alderson
Comment ID	4601057/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached.

Changes to be justified	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not effective	See attached.
Changes to be effective	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mr J Alderson Representations (44Kb)

Respondent Mr J Vowles

Respondent Name	Mr J Vowles
Comment ID	4600993/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached.
Changes to be justified	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.

Not effective	See attached.
Changes to be effective	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mr J Vowles Representations (44Kb)

Respondent Mr N Nation

Respondent Name	Mr N Nation
Comment ID	4601281/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached.
Changes to be justified	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not effective	See attached.

Changes to be effective	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mr N Nation Representations (44Kb)

Respondent Mrs D Alvis

Respondent Name	Mrs D Alvis
Comment ID	4601025/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached.
Changes to be justified	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not effective	See attached.
Changes to be effective	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.

Not consistent with national policy	
Changes to be consistent	
Attached documents	Mrs D Alvis Representations (44Kb)

Respondent Mrs V Hosken

Respondent Name	Mrs V Hosken
Comment ID	4601313/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached.
Changes to be justified	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not effective	See attached.
Changes to be effective	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not consistent with national policy	

Changes to be consistent

Attached documents

[Mrs V Hosken Representations](#) (44Kb)

Respondent Persimmon Homes Severn Valley

Respondent Name Persimmon Homes Severn Valley

Comment ID 3361153/CSPV/5

Respondent Organisation

-

Do you consider this part of the Core Strategy to be sound?

No

Not justified

Policy CS13 is considered to be unsound on account of it not being sufficiently justified. The proposed level of housing over the plan period (13,400) is significantly lower than that actually required to deliver the strategic aims of the Core Strategy. The proposed figure is not based on sufficiently robust evidence, and a more reasonable alternative would be the delivery of levels more in line with population projections and the figures contained in the emerging RSS. We do not, however, believe that the report commissioned by the Council, 'Determining a Locally Derived District Core Strategy Housing Requirement to 2026' (2010), provides sufficient justification to support such a dramatic reduction in housing numbers. This approach is based on a methodology that assumes a very low level of growth, which results in a housing requirement well below that previously proposed in the approved Structure Plan or RSS. The adoption of this cautious assessment of growth in North Somerset is not considered to be justified, and is overly reliant on recent local economic growth and forecasts. As a result, the Council's strategy over the next 20 years is predicated too heavily on recent events. See attached document for detailed comments.

Changes to be justified	The policy should be revised to reflect a more realistic level of growth, capable of supporting the District's growth over the next 20 years.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Persimmon Homes Severn Valley response.doc (94Kb)

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/16
Respondent Organisation	Persimmon Homes
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	The Policy is not justified. Whilst Persimmon Homes support the Core Strategy, particularly as it relates to Weston-super-Mare, we consider there are doubts about whether the strategy allocates sufficient numbers of houses and a lack of justification, either in the document itself, or the Woodhead supporting document, to justify a housing figure of 13,400 dwellings. There are a number of reasons for these doubts. Firstly, RSS is still part of the development plan and its Evidence Base will remain so, even when it is abolished. Also, RSS addresses sub-regional issues in relation to housing and employment numbers which set a context for Core Strategies. The North Somerset Core Strategy does not clearly set out the reasons for departing from that context in making a 50% cut in RSS housing provision. This is against other new evidence, particularly the 2008 Household Projections which indicate an even higher projected household requirement for North Somerset of 36,000, compared with 24,000 in the 2003 projections and 29,000 in the 2004 projections. A substantial part of the reduction results in the deletion of the South West Bristol urban extension. We recognise the substantial objections to the release of land for 9,000 houses from the green belt South West of Bristol, but if those housing needs still exist, the numbers should be made up elsewhere, essentially in Weston-super-Mare and/or the market towns. The reduction in housing numbers in North Somerset are matched by similar substantial reductions elsewhere in the Greater Bristol area, 27.7% in Bristol, 34.5% in South Gloucestershire and 27.2% in Bath and North East Somerset, resulting in the loss of a further 27,200 dwellings on the RSS figures. Combined with continuing in-migration nationally, based on fewer than expected migrants leaving, this will impact on the organic growth approach adopted by all the Authorities in the Greater Bristol area.
Changes to be justified	Persimmon Homes considers the Core Strategy should include a full justification to deal with the above issues and include a strategy for dealing with any potential shortfalls that occur within the Core Strategy period.
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/11
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/6
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The Council is proposing to only deliver 13,400 dwellings in the district over the plan period. This is nearly half those required by the RSS in the Secretary of State's Proposed Changes version of the document. We have previously made detailed comments on this issue in the Key Consultation Changes in October 2010. We stand by these comments and rather than repeat the arguments here, we enclose our previous comments with these representations for the Inspector to consider at the examination. The only new point we wish to make at this stage is that in this consultation document the Council states it is aiming to deliver 150 affordable dwellings per annum through this level of housing provision. The scale of annual affordable housing need (net) in the district according to the SHMA is 735 dwellings. The housing target set in this document will clearly bring about a very large backlog of need in the district. In addition, we note that the Council expects to see Registered Providers play a significant role in the delivery of affordable housing. Clearly this will be difficult in the climate of limited public funding for new affordable housing and in order to enable this, the Council may want to consider making RP development exempt from planning contributions.
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	South West Housing Association RP Planning Consortium response.pdf (72Kb) Previous Reps on Core Strategy (126Kb)

Respondent Taylor Wimpey UK Ltd

Respondent Name	Taylor Wimpey UK Ltd
Comment ID	4599521/CSPV/1
Respondent Organisation	Taylor Wimpey UK Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See Attached
Changes to be justified	A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 26,760 dwellings within North Somerset 2006-2026. See Attached
Not effective	
Changes to be effective	
Not consistent with national policy	See Attached

Changes to be consistent	A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 26,760 dwellings within North Somerset 2006-2026. See Attached
Attached documents	Response to CS13 (35Kb)

Respondent Tim Baker

Respondent Name	Tim Baker
Comment ID	4203489/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The core strategy is not justified by the evidence presented to the SWRSS EiP, whose panel concluded that housing numbers should be 26,750 for the period to 2026. No evidence has been presented that would justify the the 13,400 housing number selected by elected members. The work by Mr Woodhead was based on political direction that he was given, that much is evident from the wording of his report. There was political decision to abandon the SW Bristol urban extension and growth in the higher level settlements, all of which will lead in the Council's own words to poorer people having to leave the district because they can't afford to live there because as the council say there is a free market for housing that is people can live where they want and a shortage of housing will always lead to the poor going. The core strategy is not the most appropriate strategy, the most appropriate strategy is the one that was tested at the SWRSS EiP and found to be the growth SW of Bristol and at WsM with limit growth in the higher order settlements. There is no evidence at all that the council have considered strategies other than the one they have

	published, minor changes format he previous version dealing with infill villages etc cannot be consider serious alternatives the N Somerset Core Strategy - publication version. The council should have tested a number of strategies against national and international policies, there is no evidence that was done.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Tim Baker (33Kb)

Respondent Tuckerwood Developments/M T Smith

Respondent Name	Tuckerwood Developments/M T Smith
Comment ID	4601121/CSPV/1
Respondent Organisation	

Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached
Changes to be justified	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not effective	See attached
Changes to be effective	Increase housing requirements to around 24,000 in accordance with the higher growth, Scenario B, as set out in Table 11 of the Woodhead Report in order to ensure an adequate supply of deliverable and developable sites within the District to 2026.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Tuckerwood Developments/M T Smith Representations (44Kb)

Respondent University of Bristol (Alder King)

Respondent Name	University of Bristol (Alder King)
Comment ID	3619969/CSPV/1
Respondent Organisation	Alder King

Do you consider this part of the Core Strategy to be sound?	No
Not justified	It is considered that the Council's approach to identifying Core Strategy housing targets is unsound. It would appear that the Council's starting point for identifying a final figure is their policy position of no development in the Green Belt. However there has been no evidence to justify such a policy stance. To this extent the Council have created their own self imposed policy restriction, which has had ramifications on how they have then derived their housing target. Due to the Council's dogged application of Green Belt policy, and in the face of limited brownfield land supply, the Council have had to 'massage' their housing requirement downwards, to a level that can be accommodated on brownfield land. In an effort to reduce their housing requirement, the Council have used the recent economic downturn as an excuse for reducing housing delivery, despite the fact that both economic and demographic projections indicate a level of housing growth higher than that which the Council are proposing. Such an approach is considered to be unsound, as a failure to deliver the necessary level of housing during the plan period would have dire consequences in terms of stifling economic growth, failing to accommodate for anticipated demographic demand, and also exacerbating the current issues concerning affordable housing delivery. It is therefore considered that the Council's approach to deriving a local housing requirement is inherently flawed, resulting in an unsound Core Strategy.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	University of Bristol (3.5Mb)

Section CS14

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/12
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS 14 is unsound and needs to be amended to take account of the credible evidence on housing need and the alternative locations for the provision of new homes at Ashton Park , see BA App1 and BA App2. Amend CS 14 as set out below.
Changes to be justified	See attached form.

Not effective	Policy CS 14 is unsound and needs to be amended to take account of the credible evidence on housing need and the alternative locations for the provision of new homes at Ashton Park , see BA App1 and BA App2. The solutions provided by NS in the CS provide no flexibility and are constrained by the employment led strategy which will limit the deliverability of new homes at WsM or fail to address the key priority of reducing outcommuting and rebalancing the jobs/ homes situation (NSRLP Inspectors REPORT) Amend CS 14 as set out below as this will make the policy and the CS sound through greater flexibility and deliverability..
Changes to be effective	See attached form.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Ashton Park Ltd response CS14.doc (70Kb)
Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/20
Respondent Organisation	Ashton Park Limited
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	The CS is unsound as it provides no policy for the new settlement at Ashton Park. The evidence base for this strategy settlement is well understood and therefore we shall ask that the supporting evidence from BA App1 and App2 together with the evidence from Council's consultants Broadway Malan (Council's website) is taken in support of this scheme together with the planning application and evidence submitted as part of the RSS process. In addition the representations on Inset 3 provides the background to the alternative options for the location and scale of the development. This is not repeated here.
Changes to be justified	The council should provide for a new policy CS 35 which provides the policy and text to support the new settlement. It is inappropriate to try to draft such an important policy in the absence of clear support from the Council. We therefore ask the Inspector to request that the Council draft such a policy and circulate it.
Not effective	The CS is unsound as it provides no policy for the new settlement at Ashton Park. The evidence base for this strategy settlement is well understood and therefore we shall ask that the supporting evidence from BA App1 and App2 together with the evidence from Council's consultants Broadway Malan (Council's website) is taken in support of this scheme together with the planning application and evidence submitted as part of the RSS process. In addition the representations on Inset 3 provides the background to the alternative options for the location and scale of the development. This is not repeated here.
Changes to be effective	The council should provide for a new policy CS 35 which provides the policy and text to support the new settlement. It is inappropriate to try to draft such an important policy in the absence of clear support from the Council. We therefore ask the Inspector to request that the Council draft such a policy and circulate it.
Not consistent with national policy	The CS is unsound as it provides no policy for the new settlement at Ashton Park. The evidence base for this strategy settlement is well understood and therefore we shall ask that the supporting evidence from BA App1 and App2 together with the evidence from Council's consultants Broadway Malan (Council's website) is taken in support of this scheme together with the planning application and evidence submitted as part of the RSS process. In addition the representations on Inset 3 provides the background to the alternative options for the location and scale of the development. This is not repeated here.
Changes to be consistent	The council should provide for a new policy CS 35 which provides the policy and text to support the new settlement. It is inappropriate to try to draft such an important policy in the absence of clear support from the Council. We therefore ask the Inspector to request that the Council draft such a policy and circulate it.

Attached documents[Ashton Park Ltd CS35 \(new policy\)](#) (64Kb)**Respondent Baker Family**

Respondent Name	Baker Family
Comment ID	4601153/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to allocate sufficient land within the district to accommodate the level of growth advocated by us in our response to Policy CS13.
Changes to be justified	Increase housing provision in Clevedon/Nailsea/Portishead to allow for an extra 1000 dwellings to be constructed in Nailsea in the plan period.
Not effective	The Core Strategy fails to allocate sufficient land within the district to accommodate the level of growth advocated by us in our response to Policy CS13.
Changes to be effective	Increase housing provision in Clevedon/Nailsea/Portishead to allow for an extra 1000 dwellings to be constructed in Nailsea in the plan period.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/5
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The distribution of housing is considered to be unjustified because Yatton is not included in Policy CS31, despite holding the same characteristics as the other towns. Please refer to Section below on Effective and Representation on Policy CS31.
Changes to be justified	CS14 should be revised to include: The delivery of up to 1,000 dwellings within and adjoining Yatton in the period 2010-2026 within the remainder of the District
Not effective	Within North Somerset it is recognised that the capacity of Portishead, Nailsea and Clevedon to accommodate the scale of housing proposed is likely to be limited by particular constraints. Portishead is constrained to the north and west by Green Belt. Additionally due to its low lying position the town is also constrained by major flood risk issues. The only land available for development which is not at risk from flooding is located on high, prominent land which is likely to be unacceptable for development due to landscape impact and potential affect on Weston Wood SSSI. Clevedon is also constrained due to the M5 containing the town's eastern boundary, Clevedon Hill to the north and major flood risk areas applying to the remainder of the town and land to the south and east. Nailsea is similarly constrained by the Green Belt . Additionally whilst the southern and western boundaries could potentially accommodate additional housing development, this is likely to be constrained by the National Grid Power Lines and an area of flood risk located to the south of the town. It is clear that there is a need to identify other suitable, sustainable settlements which are free from major constraints and could accommodate additional housing in order to assist in meeting the housing needs of the rest of the District i.e. the delivery of 4,600 dwellings by 2026. In this regard Yatton is a suitable, sustainable settlement for additional housing and employment growth. This is because the settlement has a range of facilities a

	railway station. Additionally our client's site at "Land north of Arnolds Way, Yatton" is not constrained by flood risk or any other significant issues (Green Belt, motorway, national grid power lines etc) and provides an opportunity for a sustainable mixed use development for housing, employment, public open space, recreation and community facilities.
Changes to be effective	We propose that Policy CS14 should be revised to provide for the delivery of: · Significant housing at Portishead, Nailsea, Clevedon and Yatton; · Up to 1,000 dwellings within and adjoining Yatton in the period 2010-2026 within the remainder of the District; · Up to 10 ha of employment land within and adjoining Yatton for B1, B2 and B8 uses in the period 2010-2026.
Not consistent with national policy	As is detailed in our representations on the Scale of New Housing Policy CS13, the Core Strategy does not provide for scale of housing development required in the authority to meet the identified need required by the Household Projections or the jobs forecast by Oxford Economic Projections.
Changes to be consistent	We propose that Policy CS14 should be revised to provide for the delivery of: · Significant housing at Portishead, Nailsea, Clevedon and Yatton; · Up to 1,000 dwellings within and adjoining Yatton in the period 2010-2026 within the remainder of the District; · Up to 10 ha of employment land within and adjoining Yatton for B1, B2 and B8 uses in the period 2010-2026.
Attached documents	Bloor response CS14.docx (22Kb)

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/4
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	

Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Childrens Hospice South West c/o David James & Partners

Respondent Name	Childrens Hospice South West c/o David James & Partners
Comment ID	4600961/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to allocate sufficient land within the district to accommodate the level of growth advocated by us in our response to Policy CS13.
Changes to be justified	Increase housing provision in the Service Villages to allow for additional development, particularly those villages which provide a good range of facilities and amenities and which are well served by public transport.
Not effective	The Core Strategy fails to allocate sufficient land within the district to accommodate the level of growth advocated by us in our response to Policy CS13.
Changes to be effective	Increase housing provision in the Service Villages to allow for additional development, particularly those villages which provide a good range of facilities and amenities and which are well served by public transport.

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Crest Nicholson Plc

Respondent Name	Crest Nicholson Plc
Comment ID	4602465/CSPV/3
Respondent Organisation	Crest Strategic Projects Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>The table with Policy CS14 identifies a housing requirement for Clevedon, Nailsea and Portishead of 3,400 over the plan period. This equates to 170 dwellings per annum. This represents a substantial reduction on the rate achieved over the last four years and this reduction is not justified through adequate evidence. There is no justified reason for departing from the rate of completions achieved over the last four years at the Towns. Completions at the towns over the last four years (2006-2010) have been 1777 dwellings in total or 444 per annum this would equate to 8,885 dwellings in total over the twenty year period. Nailsea is categorised as a town yet the proposed level of housing growth would be inadequate to meet the vision and priority objectives proposed elsewhere in the CS associated with the town. For instance, Nailsea has seen an annual completion rate of 22 d.p.a. and this would equate to 435 dwellings over the plan period. It is proposed to provide 151 additional dwellings at Nailsea. Nailsea is a</p>

	sustainable location with good transport links to Bristol. No reasonable justification is given for the substantial reduction in housing growth at the Town.
Changes to be justified	Clevedon, Nailsea and Portishead additional housing requirement should be amended to be 8,885 dwellings 2006-2026.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/2
Respondent Organisation	Gleeson Strategic Land

Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>The Core Strategy consultation identifies housing demand at Nailsea due to its sustainability and existing services and facilities within the settlement which the Council has recognized within Chapter 2, vision 4. Despite the vision outlined within Chapter 2 we would have supported a wider review into the total housing number across the plan period for North Somerset to include an appraisal of how additional residential development could assist in enhancing the town centres including Nailsea. Despite our reservations relating to the overall housing numbers and its dispersal across North Somerset due to potential constraints to delivery, we do support the recognition of the towns of Clevedon, Nailsea and Portishead as suitable locations for residential development. The Policy identifies the Councils broad distribution of residential development for the three towns. Of the towns, the Council has demonstrated within their vision that Nailsea will benefit in the long term through the delivery of residential development with associated infrastructure and service improvements which in turn will maintain a diversity of residents within the settlement. We are concerned that overall housing supply proposed within this Core Strategy consultation has not addressed housing demand and housing need within North Somerset. Accordingly, housing allocations across the settlements should be increased to ensure adequate delivery across the plan period. Please see attached document for full comment. As such Gleeson suggests that the housing projections for Weston-Super-Mare and the Weston villages is reduced, in addition to a re-distribution of assumed delivery within the towns. We think that there should be particular emphasis on reducing the onus on Portishead to deliver 1,091 units between 2011 and 2016. which may be difficult to deliver. We suggest an increased housing allocation at Nailsea. (see attached document for full comment)</p>
Changes to be justified	Increase the housing allocation at Nailsea.
Not effective	<p>The Core Strategy consultation identifies housing demand at Nailsea due to its sustainability and existing services and facilities within the settlement which the Council has recognized within Chapter 2, vision 4. Despite the vision outlined within Chapter 2 we would have supported a wider review into the total housing number across the plan period for North Somerset to include an appraisal of how additional residential development could assist in enhancing the town centres including Nailsea. Despite our</p>

	<p>reservations relating to the overall housing numbers and its dispersal across North Somerset due to potential constraints to delivery, we do support the recognition of the towns of Clevedon, Nailsea and Portishead as suitable locations for residential development. The Policy identifies the Councils broad distribution of residential development for the three towns. Of the towns, the Council has demonstrated within their vision that Nailsea will benefit in the long term through the delivery of residential development with associated infrastructure and service improvements which in turn will maintain a diversity of residents within the settlement. We are concerned that overall housing supply proposed within this Core Strategy consultation has not addressed housing demand and housing need within North Somerset. Accordingly, housing allocations across the settlements should be increased to ensure adequate delivery across the plan period. Please see attached document for full comment. As such Gleeson suggests that the housing projections for Weston-Super-Mare and the Weston villages is reduced, in addition to a re-distribution of assumed delivery within the towns. We think that there should be particular emphasis on reducing the onus on Portishead to deliver 1,091 units between 2011 and 2016. which may be difficult to deliver. We suggest an increased housing allocation at Nailsea. (see attached document for full comment)</p>
Changes to be effective	<p>Increase the housing allocation at Nailsea.</p>
Not consistent with national policy	<p>The Core Strategy consultation identifies housing demand at Nailsea due to its sustainability and existing services and facilities within the settlement which the Council has recognized within Chapter 2, vision 4. Despite the vision outlined within Chapter 2 we would have supported a wider review into the total housing number across the plan period for North Somerset to include an appraisal of how additional residential development could assist in enhancing the town centres including Nailsea. Despite our reservations relating to the overall housing numbers and its dispersal across North Somerset due to potential constraints to delivery, we do support the recognition of the towns of Clevedon, Nailsea and Portishead as suitable locations for residential development. The Policy identifies the Councils broad distribution of residential development for the three towns. Of the towns, the Council has demonstrated within their vision that Nailsea will benefit in the long term through the delivery of residential development with associated infrastructure and service improvements which in turn will maintain a diversity of residents within the settlement. We are concerned that overall housing supply proposed within this Core Strategy consultation has not addressed housing demand and housing need within North Somerset. Accordingly, housing allocations across the settlements should be increased to ensure adequate delivery across the plan period. Please see attached document for full comment. As such Gleeson suggests that the housing projections for Weston-Super-Mare and the Weston villages is reduced, in addition to a re-distribution of assumed delivery within the towns. We think that there should be particular emphasis on reducing the onus on Portishead to deliver</p>

	1,091 units between 2011 and 2016. which may be difficult to deliver. We suggest an increased housing allocation at Nailsea. (see attached document for full comment)
Changes to be consistent	Increase the housing allocation at Nailsea.
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent Hoddell Associates

Respondent Name	Hoddell Associates
Comment ID	1055809/CSPV/2
Respondent Organisation	Hoddell Associates
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13
Changes to be justified	Increase distribution of dwellings as follows: Weston Urban Area 5,000 Weston Villages 9,000 C,N & P 5,000 Service Villages 3,000 Other Settlements 2,000 TOTAL 24,000
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13
Changes to be effective	Increase distribution of dwellings as follows: Weston Urban Area 5,000 Weston Villages 9,000 C,N & P 5,000 Service Villages 3,000 Other Settlements 2,000 TOTAL 24,000
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Hutton Garden Centre

Respondent Name	Hutton Garden Centre
Comment ID	4601633/CSPV/1
Respondent Organisation	Hutton Garden Centre
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS14 sets out the distribution of new housing, with a clearly defined hierarchy of locations: Weston, Weston villages, Clevedon & other towns, Service Villages and, finally, 'other settlements and countryside'. The latter category is seen to provide 450 dwellings. However, it is not clear as to how these dwellings will come about due to a lack of clarity in terminology, and a consequent low provision of housing allocations. Paragraph 3.192 refers to the 'rural areas', but the emphasis within that paragraph is, firstly, on the Service Villages, which are seen as providing 750 dwellings. The second reference in paragraph 3.192 is to infill villages with a settlement boundary, where small infill developments of 1 or 2 dwellings will be allowed. Reference is made to new housing elsewhere being very strictly controlled. However, if the infill villages and countryside area is expected to provide 450 dwellings, it is clear that such a very restrictive policy basis of only allowing 1 or 2 dwellings as infill may not be adequate. Concern is therefore raised that the wording of the supporting text to Policy CS14 is setting up a scenario where the Council will not realise their housing provision for all the areas of the District and, specifically, that the forthcoming Site Allocation DPD will

	not look into providing specifically allocated sites within rural areas and the countryside. There clearly may be sites in the countryside which could be allocated for housing which may be sustainable/offer landscape improvements/be well-located for services, etc, and so contribute to the 450 target for countryside areas.
Changes to be justified	The wording of paragraph 3.192 should therefore be altered to take into account that sites within the rural area may be identified through the Site Allocation DPD. No doubt these will not be many - and so there would be no conflict with paragraph 3.195 which states that development in the rural area will be very limited in scale - and the Council can assess each proposed site on its merits. But what is clear is that there is a need to recognise that allocated sites in rural areas might play a role in providing a housing that is consistent with the general objectives and strategy for the allocation of land in the District.
Not effective	See attached sheet.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	CS14 response from Hutton Garden Centre (179Kb)

Respondent Leigh Woods Society

Respondent Name	Leigh Woods Society
Comment ID	1046529/CSPV/7

Respondent Organisation	Leigh Woods Society
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/9
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No

Not justified	Settlement Hierarchy: The distribution of housing proposed is only partially supported. The continued focus of development at Weston-super-Mare is supported but this rate is lower than is necessary to meet local housing need. Objection is made to the revised strategy in respect of rural settlements. For these reasons, the policy is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives which address a higher level of growth based upon a robust and credible evidence base. Distribution of Housing: The evidence base does not substantiate the statement that 742 planning permissions will be built out or that the remaining 418 dwellings on allocated sites will be delivered either. The SHLAA document of 2008 is somewhat dated and market conditions have significantly changed since its publication. For these reasons, the anticipated level of development in Weston-super-Mare is not founded upon a robust and credible evidence base. With regard to Weston Villages, it is suggested that 5,500 dwelling should be delivered but this figure is not based upon any credible or robust evidence and certainly does not reflect the approach advocated to Mead Realisations in recent stakeholder meetings with the LPA.
Changes to be justified	Remove the reference to strictly controlling development with service villages and infill villages. Remove the reference to the prescriptive levels of growth and replace with a more general reference to the delivery of the majority of balanced, viable growth at the Weston Villages.
Not effective	See attached.
Changes to be effective	
Not consistent with national policy	Replacement Local Plan Allocation: The purpose of the Core Strategy is to replace the adopted Local Plan and the retention of existing allocations does not therefore fit PPS12. Since the historic allocations were identified as part of the Local Plan, national planning policy has materially changed, therefore it is questionable as to whether such allocations should continue to be preserved? Regard should be had to Paragraph 9.2 of PPS12. From the evidence base presented it is not clear that these allocations have been re-assessed in accordance with PPS12. We are also concerned that remaining, undeveloped allocations may not be suitable, viable or achievable and have not be properly tested in accordance with PPS3.
Changes to be consistent	Remove the reference to strictly controlling development with service villages and infill villages. Remove the reference to the prescriptive levels of growth and replace with a more general reference to the delivery of the majority of balanced, viable growth at the Weston Villages.
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/7
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	Settlement Hierarchy: The distribution of housing proposed is broadly supported. In particular, the continued focus of development at Weston-super-Mare is a correct focus however, the rate is lower than is necessary to meet local housing need and should reflect the revised requirement proposed for Policy CS13. Replacement Local Plan: The purpose of the Core Strategy is to replace the adopted Local Plan and the retention of existing allocations without proper review does not therefore fit PPS12. Since the historic allocations were identified as part of the Local Plan, national planning policy has materially changed therefore it is questionable as to whether they should be preserved? Consideration should be given to Paragraph 9.2 of PPS12; from the evidence

	base presented it is not clear that these allocations have been re-assessed in accordance with these requirements. Concern is also raised about the remaining undeveloped allocations which may not be suitable, viable or achievable and have not been properly tested in accordance with PPS3. Distribution of Housing: The statement that 742 planning permissions will be built out or that the remaining 418 dwellings on allocated sites will be delivered is not corroborated. The Housing Assessment document of 2008 is out of date and market conditions have significantly changed since its publication. As such, the anticipated level of development in Weston-super-Mare is not founded upon a robust and credible evidence base.
Changes to be consistent	Remove the reference to the prescriptive levels of growth and replace with a more general reference to the delivery of the majority of growth at Weston-super-Mare.
Attached documents	

Respondent Mr D Breeze

Respondent Name	Mr D Breeze
Comment ID	3320065/CSPV/6
Respondent Organisation	CMH Management Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We consider the Distribution of New Housing to be unsound as it is underpinned by a complete over reliance on the deliverability of major development at Weston in assuming that 6,000 dwellings will be developed there. This almost complete reliance on one

	settlement fails to address the local needs of any other settlements and unreasonably restricts local peoples choice of housing and movement to the detriment of key workers and local smaller settlements. By distributing all the housing numbers in Weston, housing delivery is being risked on a single strategy which due to a very weak local housing market will fail to deliver the numbers anticipated, leading to greater affordable housing shortages, and increased house price inflation.
Changes to be justified	We believe that Housing growth should be more widely distributed to meet local housing needs and we believe that Cleeve should be redefined as a Service Village. Our reasons for this are; Â· Following a Housing Needs Survey of Cleeve undertaken by the Parish Council and the Rural Housing Enabler, The Rural Housing Trust identified 29 households could not satisfy their housing needs in the open market and concluded that "a local needs housing scheme of say 10-12 properties with a mix of 2 and 3 bedroom dwellings would go someway towards meeting this need" Given that this survey is historic we believe that this situation will have only deteriorated and the shortage of affordable dwellings in the village is severely impacting upon local people who are unable to compete in the general open market, leading to greater social inequality. Â· We believe that Cleeve is a sustainable village with a good level of local facilities. However due to the absence of local employment opportunities and decent affordable housing the village suffers from a dormitory character. Limited local growth in the form of a local mixed-use development will create much needed employment opportunities for local people and will assist in meeting local housing needs. Â· We believe that 'Small scale residential or mixed use allocations adjacent to settlement boundaries provided they are community led and demonstrate clear local benefits' should be permitted to meet the needs of the local community. We believe that such development can be accommodated within the village without having any adverse impact on the overall character and openness of the village.
Not effective	The distribution of new housing is unsound as the deliverability of the major sites at Weston is highly questionable given the vast infrastructure investment required and the current economic climate. Furthermore the Council seem to have no alternative Strategy if these sites fail to come forward.
Changes to be effective	A greater proportion of the housing growth should be distributed to the smaller settlements and Cleeve should be considered for limited housing growth to meet local housing needs.
Not consistent with national policy	The Core Strategy fails to conform with national policy set out in PPS3 and RPG10 and the emerging Regional Spatial Strategy (RSS). We believe that the Core Strategy dismisses the past 5 years work which has been undertaken on the emerging Regional Spatial Strategy (RSS). On November 10th 2010 Mr Justice Sales ruled in the High Court that the Government had acted unlawfully in not putting any transitional arrangements for planning in place, effectively reinstating the RSS as a material consideration. We believe that should the Council take forward the Core Strategy based on the significantly lower housing

	requirements it proposes it will clearly not be in conformity with the RSS, a document which we have no idea of knowing how long will be in existence.
Changes to be consistent	Housing numbers should not be set based on the "localism " approach, which underpins this methodology of a local employment based growth strategy but must follow the guidelines set out in national guidance. We believe that the Core Strategy should as part of this process review the Green Belt boundaries particularly in relation to the infill villages which are washed over with green belt, as we consider this limits growth to the detriment of meeting local housing needs.
Attached documents	

Respondent Mr J Alderson

Respondent Name	Mr J Alderson
Comment ID	4601057/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	Increase housing provision in the Service Villages to allow for additional development, particularly those villages which provide a good range of facilities and amenities, and which are well served by public transport.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.

Changes to be effective	Increase housing provision in the Service Villages to allow for additional development, particularly those villages which provide a good range of facilities and amenities, and which are well served by public transport.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mr J Vowles

Respondent Name	Mr J Vowles
Comment ID	4600993/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	Increase number of dwellings to be provided in the Weston Villages to 9,000, as originally proposed, and provide for up to 5,000 new dwellings in the Weston Urban Area. Consider allocation of additional strategic site or sites in Weston Urban Area to accommodate extra dwellings required.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.

Changes to be effective	Increase number of dwellings to be provided in the Weston Villages to 9,000, as originally proposed, and provide for up to 5,000 new dwellings in the Weston Urban Area. Consider allocation of additional strategic site or sites in Weston Urban Area to accommodate extra dwellings required.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Name	Mr J Vowles
Comment ID	4600993/CSPV/4
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13
Changes to be justified	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be identified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District.

Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13
Changes to be effective	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be identified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mr N Nation

Respondent Name	Mr N Nation
Comment ID	4601281/CSPV/2
Respondent Organisation	
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	It is considered that some of the Infill Villages, particularly those close to the Weston Urban Area, provide a range of services and amenities, and have access to employment opportunities in the urban area, making them suitable for development beyond that currently proposed in the Core Strategy. Settlements such as Kewstoke and Locking, for instance, are capable of accommodating small scale development within and immediately adjoining existing settlement boundaries (through site allocations).
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	It is considered that some of the Infill Villages, particularly those close to the Weston Urban Area, provide a range of services and amenities, and have access to employment opportunities in the urban area, making them suitable for development beyond that currently proposed in the Core Strategy. Settlements such as Kewstoke and Locking, for instance, are capable of accommodating small scale development within and immediately adjoining existing settlement boundaries (through site allocations).
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mrs D Alvis

Respondent Name	Mrs D Alvis
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Comment ID	4601025/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	Increase number of dwellings to be provided in the Weston Villages to 9,000, as originally proposed, and provide for up to 5,000 new dwellings in the Weston Urban Area. Consider allocation of additional strategic site or sites in Weston Urban Area to accommodate extra dwellings required.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	Increase number of dwellings to be provided in the Weston Villages to 9,000, as originally proposed, and provide for up to 5,000 new dwellings in the Weston Urban Area. Consider allocation of additional strategic site or sites in Weston Urban Area to accommodate extra dwellings required.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mrs V Hosken

Respondent Name	Mrs V Hosken
Comment ID	4601313/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	It is considered that some of the Infill Villages, particularly those close to the Weston Urban Area, provide a range of services and amenities, and have access to employment opportunities in the urban area, making them suitable for development beyond that currently proposed in the Core Strategy. Settlements such as Kewstoke and Locking, for instance, are capable of accommodating small scale development within and immediately adjoining existing settlement boundaries (through site allocations).
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	It is considered that some of the Infill Villages, particularly those close to the Weston Urban Area, provide a range of services and amenities, and have access to employment opportunities in the urban area, making them suitable for development beyond that currently proposed in the Core Strategy. Settlements such as Kewstoke and Locking, for instance, are capable of accommodating small scale development within and immediately adjoining existing settlement boundaries (through site allocations).
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Persimmon Homes Severn Valley

Respondent Name	Persimmon Homes Severn Valley
Comment ID	3361153/CSPV/6
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The proposed distribution is not based on sufficient justification, and other reasonable alternatives should be considered to allow a more appropriate distribution across the District. It is inappropriate to suggest that all service villages should be restricted to a limited number of small-scale developments. This approach fails to support the delivery of the Council's vision for 2026 of seeing service villages becoming thriving rural communities. It is accepted that in some instances only small-scale development will be appropriate in service villages, but there must also be scope for development in excess of 10 units where appropriate to a particular settlement. The Core Strategy should therefore adopt an alternative approach that allows for an increased level of development within the service villages, and more flexibility as to the appropriate scale of development. Where appropriate to a particular service village there should be opportunities to bring forward development capable of supporting existing services and facilities, as

	well as delivering, or helping to deliver, new community services and facilities, employment opportunities and affordable housing. The important role of the service villages in the distribution of new housing across the District is strengthened by the limited availability of appropriate sites for development in the main towns of Portishead, Clevedon and Nailsea. This was reflected in the Council's Strategic Housing Land Availability Assessment. Another important consideration is the Council's policy of not supporting the release of green belt land for development. As a result it will be necessary to allow for sufficient development in service villages, as well as the main towns.
Changes to be justified	The Core Strategy should adopt an alternative approach that allows for an increased level of development within the service villages, and more flexibility as to the appropriate scale of development.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Persimmon Homes Severn Valley Rep (94Kb)

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
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Comment ID	3998081/CSPV/17
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	This Policy is not effective. Persimmon Homes support the focus for new residential development at Weston-super-Mare, with strategic allocations at Weston Villages where residential will be phased with employment. However, we are concerned that opportunities for new development outside Weston-super-Mare are extremely limited. Of the remaining requirement of 6,047 dwellings which the Core Strategy needs to find, 91% are in Weston Villages and only 3% outside Weston-super-Mare. Persimmon considers that if in relation to Policy CS13 there is a requirement to increase numbers in North Somerset, the potential of Clevedon, Nailsea and Portishead and the service villages should be considered through a criteria based Policy which could be used to assess potential allocations in a subsequent DPD.
Changes to be effective	Persimmon considers that if in relation to Policy CS13 there is a requirement to increase numbers in North Somerset, the potential of Clevedon, Nailsea and Portishead and the service villages should be considered through a criteria based Policy which could be used to assess potential allocations in a subsequent DPD.
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Sanders Executive Pension Fund

Respondent Name	Sanders Executive Pension Fund
Comment ID	4614081/CSPV/1
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Subject to the categorisation of Settlements, whether as Service Villages or Infill Villages, the plan should allow scope for appropriate types and scale of residential development to occur, having regard to not only the level of existing facilities within the village, but also proximity of the village to either Weston-super-Mare or one of the main centres. IN the interests of maintaining the future health and wellbeing of rural communities, there is a desire to ensure that a suitable plan and scale of residential development takes place in appropriate rural locations to maintain their attraction as places to live and in order to support vital community facilities.
Changes to be justified	Infill village development should not be strictly confined to infilling but also to appropriate new development within or on the edge of existing settlement boundaries, subject to this being a community led proposal that has some degree of local support.

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Sanders Executive Pension Fund (1.3Mb)

Respondent Summerfield Developments (SW) Ltd (WYG Planning & Design)

Respondent Name	Summerfield Developments (SW) Ltd (WYG Planning & Design)
Comment ID	3846625/CSPV/2
Respondent Organisation	WYG Planning & Design
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	Summerfield Developments (SW) Ltd (62Kb)

Respondent Taylor Wimpey UK Ltd

Respondent Name	Taylor Wimpey UK Ltd
Comment ID	4599521/CSPV/2
Respondent Organisation	Taylor Wimpey UK Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Policy CS14 identifies the Service Villages with 750 net additional new dwellings over the period 2006-26. At the equivalent of 37.5 dwelling completions on average pa this represents a substantial and unjustified reduction on the rate achieved over the last 4 years (2006-2010) for those nine settlements combined at 117.5 dpa. The housing trajectory indicates this reducing to 4 dwellings pa shared between all 9 settlements over the second half of the plan period. Yatton is categorised as a Service Village. The other eight villages range in size of population from just under 3,000 to 5,500. With a population of just over 9,000, Yatton is by far and away the largest settlement listed and stands out from the rest. Such a level of development would be completely inadequate to meet the Vision and the priority objectives 3, 6, 7, 8 and 9 associated with development in these villages. This is only 300 dwellings (over 20 years) more than has been associated with the remaining and by definition much smaller un-serviced settlements and the wider countryside combined. Even on a net-nil migration scenario Yatton will require considerably more</p>

	<p>housing development over the period to 2026 than can be achieved within the limits on new housebuilding implied in Policy CS14. Policy CS14 envisages all nine Service Villages sharing between them, on average, approximately 37 dwelling completions pa. This would equate to approximately one-third the level of completions achieved over the last four years. Yatton's share of this new development would unequivocally not sustain existing population levels or the proportion of those living within the community being within an age range that would be economically active and would clearly not achieve the vibrancy, vision and the sustainability objectives. No reason to depart from the rate of completions seen over the first 4 years of the plan-period and consequently, on this basis, a figure of 2,350 would be justified.</p>
Changes to be justified	Serviced Villages: 2,350 See Attached
Not effective	
Changes to be effective	
Not consistent with national policy	See Attached
Changes to be consistent	Serviced Villages: 2,350 See Attached
Attached documents	Response to CS14 (23Kb)

Respondent Tim Baker

Respondent Name	Tim Baker
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Comment ID	4203489/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The core strategy is not effective as is does not guarantee delivery of its, unsound, policies. The linkage of delivery to jobs in WsM is unrealistic and unenforceable in development control. It is not effective because it relies on the delivery of a handful of large sites, each of which has a long list of development constraints (access by public transport, flooding, utilities availability, contamination, etc) and any of which has a question mark over its viability without public sector grant aid, unlikely to be forthcoming, or without downgrading the S106 contributions to the point where the development no longer becomes sustainable.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents

[Tim Baker](#) (33Kb)

Respondent Tuckerwood Developments/M T Smith

Respondent Name	Tuckerwood Developments/M T Smith
Comment ID	4601121/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13
Changes to be justified	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be identified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13
Changes to be effective	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be identified in the

	Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS15

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/5
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/3
Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent McCarthy & Stone Retirement Lifestyles Ltd

Respondent Name	McCarthy & Stone Retirement Lifestyles Ltd
Comment ID	2884417/CSPV/1
Respondent Organisation	McCarthy & Stone Retirement Lifestyles Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The approach is not backed up by national statistics and evidence. Not enough emphasis is placed on the ageing population and associated housing needs. The Core Strategy should provide clearer positive support for the full mix of private sheltered, close care, assisted living extra care and other forms of accommodation for over 65's. There should be a positive policy supporting older persons accommodation in the same way that affordable housing is given a high priority. The Development Management DPD should then consider more site specific health facilities, older persons accommodation and care homes, by identifying good sustainable, accessible town centre sites.
Changes to be justified	To make the document sound it is suggested that there is inclusion of a specific Core Strategy policy or supporting text to draw out the importance and planning implications of the ageing population. The Governments desire to provide greater housing choice for older people means there will be a need for a variety of housing choices to be made available, including support for older people living independent lives in their own homes, sheltered or extra care housing.....for a significant number the benefits of sheltered or extra care housing will be essential if they are to maintain an independent lifestyle. As set out above the provision of such housing offers choice, frees up under occupied family sized homes and offers an improved quality life including improved mental and physical wellbeing of people.
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	McCarthy and Stone full comment (264Kb)

Respondent Persimmon Homes Severn Valley

Respondent Name	Persimmon Homes Severn Valley
Comment ID	3361153/CSPV/7
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	

Changes to be justified	
Not effective	The effectiveness of the policy is undermined by the nature of other policies included in the Publication Version Core Strategy. To create mixed and balanced communities it is necessary to deliver a genuine mix of housing types and tenures across the District. This is, however, restricted by the low level of new housing proposed, together with the failure to distribute sufficient housing to the key service villages outside of the four main towns. 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 (e.g. such development provides opportunities to redress existing imbalances in the mix of housing types and tenures).
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/18

Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	This Policy is not justified or effective. Persimmon Homes support the need to ensure a genuine mix of housing in existing and mixed communities. The existing and future planning applications at Weston Airfield are clearly geared to achieving that. It is at Weston Villages where 41% of the total housing allocation and 91% of remaining requirement is concentrated that the opportunities exist to achieve that. Outside Weston it is not so clear how the Policy aim can be achieved. The Core Strategy approach set out in Paragraphs 3.207 to 3.210 concentrate on meeting part (b) of the Policy, the proliferation of single house types. The only other measures relate to increasing the range of services which will not have a direct impact on increasing mix and increasing accessibility to the housing market, which is unexplained and will require intervention beyond the planning system. Further monitoring is limited to mix of housing types in new developments and issues in Central and South Wards in Weston-super-Mare, both of which will only marginally impact on the majority of the area.
Changes to be justified	-
Not effective	This Policy is not justified or effective. Persimmon Homes support the need to ensure a genuine mix of housing in existing and mixed communities. The existing and future planning applications at Weston Airfield are clearly geared to achieving that. It is at Weston Villages where 41% of the total housing allocation and 91% of remaining requirement is concentrated that the opportunities exist to achieve that. Outside Weston it is not so clear how the Policy aim can be achieved. The Core Strategy approach set out in Paragraphs 3.207 to 3.210 concentrate on meeting part (b) of the Policy, the proliferation of single house types. The only other measures relate to increasing the range of services which will not have a direct impact on increasing mix and increasing accessibility to the housing market, which is unexplained and will require intervention beyond the planning system. Further monitoring is limited to mix of housing types in new developments and issues in Central and South Wards in Weston-super-Mare, both of which will only marginally impact on the majority of the area.

Changes to be effective	-
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/8
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Section CS16

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/18
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached form. Policy is not robust and based on credible evidence - it will be amended because: 1. Affordable rent should be added to the definition of affordable housing. 2. Policy should be clear that the target is to achieve 30% affordable housing. 3. Period of the plan is 2006-2026 therefore the annual delivery target should be based throughout that period. 4. SHMA makes that need far exceeds delivery of affordable housing through this type of policy. Objective is therefore to deliver as much affordable housing as possible to make good the shortfall. Annual delivery target should be 300 pa. 5. Tenure split should reflect new definition of affordable rent. 6. Delete reference to 'without the need for public subsidy' as this is no longer available or relevant. 7.

	<p>30% is based on making a contribution to local need - however it is not determined by local need but on practical and achievable levels of affordable housing - the opportunity to increase this figure because the need may increase is entirely inappropriate. Any change should follow a proper review of the Core Strategy. 8. Seeking contributions from sites less than 5 is not national policy, nor is it expressed as policy here which could be considered through the planning process. Policy is unclear and should not seek to allow arbitrary charging of financial sums for new homes under the threshold. Without these amendments the policy will be unsound. Text refers to market recovery mechanisms which are part of the draft development contributions SPD - new fundamental principles should be brought forward at this examination. Text should make reference to Ashton Park as a major contributor to affordable housing.</p>
Changes to be justified	See attached form.
Not effective	<p>See attached form. Policy is not robust and based on credible evidence - it will be amended because: 1. Affordable rent should be added to the definition of affordable housing. 2. Policy should be clear that the target is to achieve 30% affordable housing. 3. Period of the plan is 2006-2026 therefore the annual delivery target should be based throughout that period. 4. SHMA makes that need far exceeds delivery of affordable housing through this type of policy. Objective is therefore to deliver as much affordable housing as possible to make good the shortfall. Annual delivery target should be 300 pa. 5. Tenure split should reflect new definition of affordable rent. 6. Delete reference to 'without the need for public subsidy' as this is no longer available or relevant. 7. 30% is based on making a contribution to local need - however it is not determined by local need but on practical and achievable levels of affordable housing - the opportunity to increase this figure because the need may increase is entirely inappropriate. Any change should follow a proper review of the Core Strategy. 8. Seeking contributions from sites less than 5 is not national policy, nor is it expressed as policy here which could be considered through the planning process. Policy is unclear and should not seek to allow arbitrary charging of financial sums for new homes under the threshold. Without these amendments the policy will be unsound. Text refers to market recovery mechanisms which are part of the draft development contributions SPD - new fundamental principles should be brought forward at this examination. Text should make reference to Ashton Park as a major contributor to affordable housing.</p>
Changes to be effective	See attached form.
Not consistent	See attached form. Policy is not robust and based on credible evidence - it will be amended because: 1. Affordable rent should be added to the definition of affordable housing. 2. Policy should be clear that the target is to achieve 30% affordable housing. 3.

with national policy	Period of the plan is 2006-2026 therefore the annual delivery target should be based throughout that period. 4. SHMA makes that need far exceeds delivery of affordable housing through this type of policy. Objective is therefore to deliver as much affordable housing as possible to make good the shortfall. Annual delivery target should be 300 pa. 5. Tenure split should reflect new definition of affordable rent. 6. Delete reference to 'without the need for public subsidy' as this is no longer available or relevant. 7. 30% is based on making a contribution to local need - however it is not determined by local need but on practical and achievable levels of affordable housing - the opportunity to increase this figure because the need may increase is entirely inappropriate. Any change should follow a proper review of the Core Strategy. 8. Seeking contributions from sites less than 5 is not national policy, nor is it expressed as policy here which could be considered through the planning process. Policy is unclear and should not seek to allow arbitrary charging of financial sums for new homes under the threshold. Without these amendments the policy will be unsound. Text refers to market recovery mechanisms which are part of the draft development contributions SPD - new fundamental principles should be brought forward at this examination.
Changes to be consistent	See attached form.
Attached documents	Ashton Park Ltd response CS16.doc (93Kb)

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/6
Respondent Organisation	Bloor Homes
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	We object to Policy CS16 as we have not seen evidence to confirm that the policy has been subject to a viability assessment.
Changes to be justified	We propose that Policy CS16 should be amended by: · Providing a viability assessment considering whether it is viable to deliver 30% affordable homes on large sites across the district;
Not effective	From existing experience within Weston Super Mare, it is likely that the 30% affordable homes target proposed by the Council is likely to render most schemes unviable without the provision of public subsidy. It is therefore crucially important for this policy to be subject to viability assessment in order to ensure that the policy is deliverable, effective and complies with the findings of the Court of Appeal at Blythe Valley District Council in respect of their Affordable Housing policy.
Changes to be effective	We propose that Policy CS16 should be amended by: · Providing a viability assessment considering whether it is viable to deliver 30% affordable homes on large sites across the district; · Identifying that the 30% benchmark is not the minimum requirement and that variances below this will be accepted subject to project viability and consideration of the overall S106 package relating to a proposed development.
Not consistent with national policy	We note that the Policy seeks to deliver a benchmark of 30% as a starting point; however paragraph 29 of PPS3, states that Local Planning Authorities should: "Set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided". It should also reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing." Accordingly PPS3 allows for a range of affordable housing to be provided on sites across Districts in order to reflect project viabilities. Accordingly 30% should not be treated as the minimum required to be delivered by developers. It should also be recognised that the Core Strategy (Policy CS34) seeks major contributions from developers towards the provision of education, public open space, libraries, highways and public transport improvements. Additionally it also necessary to factor in the major additional costs which will be created through proposed Policy CS2 which seeks to require Code Level 4 on all housing project, 15% renewable energy and Life Time Home Standards on all homes completed post 2013. These requirements in addition to the affordable housing target, create very considerable additional costs and undermine the viability of major developments. We therefore consider that Policy CS16 fails the tests of soundness relating to conformity with national planning policy guidance and the provision of a robust and sound evidence base as required by PPS12.

Changes to be consistent	We propose that Policy CS16 should be amended by: · Identifying that the 30% benchmark is not the minimum requirement and that variances below this will be accepted subject to project viability and consideration of the overall S106 package relating to a proposed development.
Attached documents	

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/6
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/14
Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	CPRE supports the need for a evidence based local needs survey with 'local' defined and eligibility made clear. This comment also relates to Visions 6 and 7 and Priority Objective 8.
Changes to be justified	a) Confirms the need for an up-to-date needs survey but doesn't define 'local' and does not clarify 'other evidence'.
Not effective	The use of rural exception schemes should only be acceptable where rigorous examination of a defined local need exists and is not capable of being met in any other way.
Changes to be effective	Surveys should consider the whole 'stock' of existing affordable housing within a village when making assessments. Consideration should be given to the tenure of existing 'affordable' housing to establish whether needs could be met by 3 bed (plus) properties inhabited by one or two individuals exchanged for smaller properties. Exception schemes using green field sites should be 'exceptional'
Not consistent with national policy	
Changes to be consistent	

Attached documents

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/4
Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	Gleeson supports the provision of a benchmark of 30% affordable housing, although we believe that the policy should allow a degree of flexibility to ensure that site specific matters such as site conditions can be taken into account during the application process and also so that the policy framework can be varied in order to take account of wider market conditions and housing demand within the locality of the scheme.
Changes to be effective	A degree of flexibility should be allowed to ensure that site specific matters such as site conditions can be taken into account during the application process and also so that the policy framework can be varied in order to take account of wider market conditions and housing demand within the locality of the scheme.

Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent Home Builders Federation Ltd

Respondent Name	Home Builders Federation Ltd
Comment ID	2549089/CSPV/6
Respondent Organisation	Home Builders Federation Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The benchmark target of 30% affordable housing is unjustified. It is unclear whether the Council has assessed the viability of this target in accordance with the requirement in paragraph 29 of PPS3. We have been unable to locate an economic viability assessment in the evidence base that would enable us to scrutinise whether such a benchmark target is deliverable. The Council should demonstrate that the policies in its core strategy are justified and deliverable. Deferring this issue to subsequent guidance

	(as indicated by the last paragraph of the policy) is not satisfactory. It is contrary to PPS12. Paragraph 6.1 of PPS12 is clear that SPDs (or other documents) should not be used to determine policy for matters that should be considered at examination.
Changes to be justified	The Council should demonstrate that the policies in its core strategy are justified and deliverable. Deferring this issue to subsequent guidance (as indicated by the last paragraph of the policy) is not satisfactory. It is contrary to PPS12. Paragraph 6.1 of PPS12 is clear that SPDs (or other documents) should not be used to determine policy for matters that should be considered at examination.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Martyn Leisure

Respondent Name	Martyn Leisure
Comment ID	3583521/CSPV/3

Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	Our client, Martyn Leisure, considers the requirements for Affordable Housing are unduly onerous and will adversely affect the provision of other housing particularly where there is a need. To require either affordable housing or financial contributions through planning permissions of between 5-9 dwellings in addition to market recovery mechanisms might severely impact upon the deliverability of housing - which is fundamental to the success of the Core Strategy. Martyn Leisure considers that a suitable, realistic threshold should be applied which would enable smaller, infill development to come forward quickly and simply as a means of meeting housing needs - thereby satisfying the thrust of PPS1 and, more specifically, PPS3.
Changes to be consistent	Martyn Leisure requests that the first paragraph of Policy CS16: Affordable Housing be amended as follows: "... to meet local needs on all residential developments of 10 dwellings or more (on sites of 0.3 ha or above). (Delete: On sites of 5-9 dwellings the council will seek to negotiate either on-site provision or a financial contribution towards the provision of affordable housing)
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/10
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The threshold for affordable housing contributions has been reduced from previous versions of the Core Strategy. Furthermore, an additional trigger point for 5-9 dwellings to contribute affordable housing provision has been added to Policy CS16. In general we support the principle of affordable housing delivery; however, we consider that a reduction in threshold and additional threshold criteria has not been justified and is not therefore supported by robust evidence. PPS3, paragraph 29 makes it clear that local planning authorities need to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and the creation of mixed communities. Whilst, the Core Strategy recognises this at Paragraph 2.216, there is no evidence that the Council have undertaken such an assessment. See full representation attached for detailed comment.
Changes to be justified	Remove the requirement to plan for a 82/18 split of tenure and rely on the most up to date Housing Need Assessments to determine this. LPA to undertake viability testing of the policy. Provide a clear target of 30% and use viability testing if below to determine if development is appropriate in planning terms.
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/8
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No

Not justified	When compared to the previous versions of the Core Strategy, the threshold for affordable housing contributions has been reduced. Furthermore, an additional trigger point on new residential development of 5-9 dwellings to contribute to affordable housing provision has been added to Policy CS16. General support is given to the principle of affordable housing delivery; however, it is considered that a reduction in threshold and additional threshold criteria is not justified and therefore not supported by robust and credible evidence. There is no evidence that the Council have undertaken an economic viability assessment in the preparation of the Core Strategy, as stated in para 29 of PPS3.3. The requirement for an 82/18% division between social rented and intermediate rent as proposed in Policy CS16 is inflexible and does not permit a wide enough range of local variation. The tenure split contained within Policy CS16 should be revised to ensure that the principles of the Core Strategy remain in light of changes in national policy and local circumstances. The approach taken in Policy CS16 puts the responsibility on the developer to undertake a viability assessment on a development which is not consistent with PPS3. It is possible that North Somerset Council are potentially introducing significant delay to the delivery of housing by relying on viability assessments for all sites where affordable housing provision is set if robust targets based upon proper viability testing is set. This is not an effective delivery policy. These delays could be further increased by the suggestion that 30% is a benchmark. This does not provide any certainty to the process and places the whole delivery of affordable housing upon viability testing processes. We also consider that a spread of development on small sites at the Weston Urban Area would allow an immediate opportunity to deliver some small-scale housing and meet the needs for affordable housing in the short-term.
Changes to be justified	Provide a clear target of 30% and use viability testing if below to determine if development is appropriate in planning terms.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents[Mr B Hayes response.docx](#) (27Kb)**Respondent** Persimmon Homes Severn Valley

Respondent Name	Persimmon Homes Severn Valley
Comment ID	3361153/CSPV/8
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	Again, the effective delivery of Policy CS16 is seriously undermined by other policies contained in the Core Strategy. Policy CS16 makes it clear that to help create mixed and balanced communities there will be a presumption that affordable housing will be provided on-site. If this is to be achieved, however, it is necessary for other policies in the Core Strategy to allow for an appropriate level of housing development in across the District, including in service villages. Without new market led housing developments, a sufficient level of affordable housing will simply not be built in these areas. This is less likely to be delivered when service villages are limited to 'small-scale housing'. The failure to generate significant levels of affordable housing across the

	District will exacerbate the existing shortfall in affordable housing provision. It will also fail to address the affordable housing requirement identified in the SHMA.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/19
Respondent Organisation	Persimmon Homes
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	This Policy is not justified. Persimmon Homes generally support the approach to affordable housing set out in Policy CS16, particularly that provision on individual sites will be determined through negotiation and individual site viability analyses provided by the Developer and that deliverability must take into account the employment-led approach.
Changes to be justified	We would like to see the following changes in order to provide a more robust and properly justified Policy: 1. A proper definition of "local" in applying a local lettings approach. 2. Incorporation of the need to take into account the Policy requirement for an employment-led approach in Paragraph 3.219 in the Policy. 3. An explanation of the Evidence Base for the 30% benchmark affordable housing requirement in accordance with Paragraph 29 of PPS3.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/9

Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	<p>We are pleased to note that the Council has not set an affordable housing threshold of less than five units. The thresholds propose appear sensible, but we are unsure if they are viable in all parts of the district. One threshold for Weston-Super-Mare and another for the rest of the district may be appropriate. However, there has been no viability testing of the proposed thresholds, so at the current time we can not support them. We understand that the Council wish to maximise the delivery of affordable housing units on site depending on the value of the site, but we are concerned that this proposed policy will not provide sufficient clarity to developers. The policy will require a site-by-site analysis of the viability of each development over five units to determine how much affordable housing it can maintain. There are a number of problems with this approach which may make it counter productive: 1.Are there the resources or the skills within the Council to do this for every site - officer time would be better spent negotiating higher proportions of affordable housing on the larger sites rather than on every single site. 2. Not setting an upper limit for an affordable housing requirement will not offer developers or landowners any certainty over the level of affordable housing they will be expected to provide. We consider that this policy is likely to lead to considerable delays and disputes in bringing forward affordable housing in the district. In addition, even the 30% affordable housing 'benchmark' has not been tested by an economic viability assessment. We also note that in Section 3.214 the Core Strategy refers to the PPS3 definitions of affordable housing. These are currently subject to consultation over the new affordable rent definition. Finally, we have some concerns that the Council's target of 150 new affordable dwellings in the district may not be achievable. See attached document for detail comments.</p>

Changes to be effective	We recommend that the Council undertake some focussed consultation on this policy when the assessment becomes available in order to ensure that the policy is sound and has been fully consulted upon. We note the Council's intention to require new affordable housing to consist of 82% social rent and 18% intermediate housing. We recommend that this is rounded up to 80%/20% to assist in the delivery of mixed and balance communities and to ensure that negotiations on affordable housing on smaller schemes are straight forward. The Council will need to define what role the new affordable rent product will play within this tenure split. We consider that affordable rent should be equated to social rent. We do not consider that any reference to the local lettings policy is required in the Core Strategy, which is a strategic document. We recommend that as an alternative to assessing the viability of every scheme, targets for the whole district is set as informed by the strategic viability assessment. This could set one target for Weston- Super-Mare and another for the rest of the district. In order to maximise the delivery of affordable housing it could also reserve the right to set an individual target for the Weston Villages urban extension through a separate policy document.
Not consistent with national policy	
Changes to be consistent	
Attached documents	South West Housing Association RP Planning Consortium response.pdf (72Kb)

Section CS17

Respondent Kingston Seymour Parish Council

Respondent Name	Kingston Seymour Parish Council
Comment ID	1017889/CSPV/2
Respondent Organisation	Kingston Seymour Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	It seems unreasonable and unjustifiable to deny to small villages without settlement boundaries the possibility of acquiring a very limited number of affordable houses (say 2 - 4) under the rural exception scheme. Further, no evidence is presented to justify a departure from national policy as set out in PPS 3 (see below). Kingston Seymour is a flourishing community with over 50 small businesses and a growing number of young families. However it is currently almost impossible for young people growing up in the village to buy / rent their own home here due to a lack of suitable and affordable properties. Although the Council has no immediate for affordable housing it would not wish to be prevented from including such a proposal in a future Neighbourhood Development Plan.
Changes to be justified	The fifth paragraph of the policy should be amended by the deletion of the phrase "and then only adjacent to settlement boundaries". This would then permit both infill villages and smaller settlements to have small numbers of affordable houses. This change would be consistent with the principle of natural justice and is also required in order to ensure that the policy complies with national policy (see below) Policy CS33 should be amended also.
Not effective	
Changes to be effective	

Not consistent with national policy	One of the objectives of Planning Policy Statement 3: Housing is "A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural" (para 9). This is not qualified to limit its application to certain types of villages. Para 30 re-states and amplifies this, and refers to the Rural Exception Site Policy. This is deliberately intended to apply "in small rural communities that would not normally be used for housing, because, for example, they are subject to policies of restraint". No evidence is presented here to justify a departure from national policy.
Changes to be consistent	The fifth paragraph of the policy should be amended by the deletion of the phrase "and then only adjacent to settlement boundaries". This would then permit both infill villages and smaller settlements to have small numbers of affordable houses. This change is required in order to ensure that the policy complies with national policy (see below) Para 3.226 will require consequent amendment, Policy CS33 and Para 4.96 should be amended also.
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/12
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/10
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We are pleased to see that the Council is pushing forward its rural exception scheme policy in the Core Strategy. However, we have a few concerns as to how this might operate in practice. The policy states that housing schemes for 100% affordable housing will be considered for rural exception scheme. However, given the lack of the public subsidy available in the future we consider that it is less likely that 100% affordable housing schemes will come forward and cross-subsidy with market housing will be required to make these schemes viable. A number of local authorities are now proposing policies that allow for cross-subsidy (examples enclosed) and we consider that North Somerset should introduce a similar policy. The council are also proposing that all rural exception schemes will require parish council support as a pre-requisite for planning permission. This was previously part of the old PPG3, but was dropped as it essential gave Parish Council's the power of veto. We recommend that the Council drop this requirement as rural exception schemes can be blocked for purely political reasons in rural areas. Furthermore, the Localism Bill will give parish councils the opportunity to bring forward their own schemes through the Community Right to Build and

	Neighbourhood Planning. In addition, we consider the need for a site search to identify every site in the village to be too onerous. Rural exception schemes sites that come forward are usually the only available one in or around the village. Our experience is that these site searches are usually a needless exercise, when the key issue is site availability.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	We do not agree that the Green Belt should be an ultimate constraint to rural exception schemes. PPG2 provides the additional protection required for the consideration of Green Belt sites. Each site should be considered on its merits and the scale of need in that settlement.
Changes to be consistent	
Attached documents	South West RP Planning Consortium Repls (72Kb)

Section CS18

Respondent Congresbury Parish Council

Respondent Name	Congresbury Parish Council
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Comment ID	1078849/CSPV/2
Respondent Organisation	Congresbury Parish Council
Do you consider this part of the Core Strategy to be sound?	
Not justified	
Changes to be justified	<p>This policy statement does not mention when taking potential sites into consideration, whether or not there is already a large population of Gypsy and Traveller people at a location. The policy should steer away from creating ghettos within rural parishes like Congresbury? Congresbury currently has 43 occupied pitches on Moorland Park a further 4 unauthorised sites in an adjacent field and another four sites at Moorbridge Mobile home site. This policy could create pockets of social and economic deprivation in rural communities. The policy should aim to deliver strong and inclusive communities. Current Gypsy & Traveller sites within the Parishes of Congresbury and Hewish are built on high risk flood plain, which goes against the advice of the Environment Agency. Congresbury Parish Council appreciates that there is a real need to accommodate the Gypsy, Traveller and Travelling Show people within North Somerset however the Parish Council would not wish to see increased provision for the above within the parish. The parish already makes provision for a substantial number of pitches and any increase would have an adverse effect on the provision of village services, particularly the school and medical practice.</p>
Not effective	
Changes to be effective	
Not consistent with	

national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/13
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Traveller Law Reform Project

Respondent Name	Traveller Law Reform Project
Comment ID	2529537/CSPV/1
Respondent Organisation	Traveller Law Reform Project
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	<p>We welcome the inclusion of a policy for Gypsies and Travellers and Travelling Showpeople accommodation and the indication that sites will be identified through a site allocation DPD but we have some reservations about some of the detail which lead us to object to the policy on the grounds that it is not consistent with national policy and also may not be effective in delivery of needed sites. Given the extent of Green Belt we consider that the statement that 'sites are inappropriate in Green Belt' does not fully reflect either case law in relation to appeals or national policy as contained in Circular 1/2006. 1/2006 para 49-51 give guidance on Green Belt. It is clear that although there is a general presumption against sites in Green Belt exceptional circumstances allow for sites in the Green Belt. Our other concerns relate principally to delivery issues. Unlike conventional housing no indication is given about when land will be identified or a trajectory for allocation. Beyond indicating that needs to 2011 are 36 residential pitches and 10 transit pitches to 2011 the policy gives no indication of the likely level of future needs. The Panel report of the Partial Review of the RSS (April 2008) recommends that plans should be made into the future based on a 3% compound growth to take account of family formation. In the absence of an indication as to when a future review of the GTAA will take place this does leave post-2011 provision in doubt. We also have concerns that the council has identified transit provision as a priority. Whilst transit provision is important we think that it should go hand in hand with residential provision. To prioritise transit provision does suggest that the</p>

	<p>council is more concerned to deal with unauthorised camping rather than much needed residential provision. Failure to make provision for residential provision is in itself likely to lead to increased levels of unauthorised camping.</p>
Changes to be effective	<p>In order for the policy to be conformable with national policy and case law 'Sites are inappropriate in the Green Belt' should be replaced by Sites are normally inappropriate in the Green Belt unless there are exceptional circumstances'. Under the Core Strategy approach the council should lay out a trajectory for provision until at least 2016 and indicate when a review of the GTAA will be undertaken. This will help ensure effective and timely provision which will match developing needs. The priority indicated in 3.234 should be altered to read: "Both residential and transit provision have a priority in North Somerset to ensure that there is a supply of needed pitches in both categories. Any transit site should be easily accessible to and from the M5 corridor."</p>
Not consistent with national policy	<p>We welcome the inclusion of a policy for Gypsies and Travellers and Travelling Showpeople accommodation and the indication that sites will be identified through a site allocation DPD but we have some reservations about some of the detail which lead us to object to the policy on the grounds that it is not consistent with national policy and also may not be effective in delivery of needed sites. Given the extent of Green Belt we consider that the statement that 'sites are inappropriate in Green Belt' does not fully reflect either case law in relation to appeals or national policy as contained in Circular 1/2006. 1/2006 para 49-51 give guidance on Green Belt. It is clear that although there is a general presumption against sites in Green Belt exceptional circumstances allow for sites in the Green Belt. Our other concerns relate principally to delivery issues. Unlike conventional housing no indication is given about when land will be identified or a trajectory for allocation. Beyond indicating that needs to 2011 are 36 residential pitches and 10 transit pitches to 2011 the policy gives no indication of the likely level of future needs. The Panel report of the Partial Review of the RSS (April 2008) recommends that plans should be made into the future based on a 3% compound growth to take account of family formation. In the absence of an indication as to when a future review of the GTAA will take place this does leave post-2011 provision in doubt. We also have concerns that the council has identified transit provision as a priority. Whilst transit provision is important we think that it should go hand in hand with residential provision. To prioritise transit provision does suggest that the council is more concerned to deal with unauthorised camping rather than much needed residential provision. Failure to make provision for residential provision is in itself likely to lead to increased levels of unauthorised camping.</p>
Changes to be consistent	<p>In order for the policy to be conformable with national policy and case law 'Sites are inappropriate in the Green Belt' should be replaced by Sites are normally inappropriate in the Green Belt unless there are exceptional circumstances'. Under the Core Strategy approach the council should lay out a trajectory for provision until at least 2016 and indicate when a review of the GTAA will be undertaken. This will help ensure effective and timely provision which will match developing needs. The priority indicated in</p>

3.234 should be altered to read: "Both residential and transit provision have a priority in North Somerset to ensure that is a supply of needed pitches in both categories. Any transit site should be easily accessible to and from the M5 corridor."

Attached documents

Section CS19

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/14
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS 19 is an important policy to prevent slow incremental growth at settlements which are at risk of losing their character and coalescing with other settlements. This is especially important with settlements beyond the Green Belt. The Key Diagram should show the broad position of the Strategic Gaps and not leave it for a subsequent DPD.(see Key Diagram Rep). The Inset Plans should show the location of SG to protect settlements (See New Inset 3). We support SG but this needs to be expressed on plans .

Changes to be justified	Identify SG on Key Diagram and Inset Plans
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/7
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	We object to this policy as there is no basis for the designation of Strategic Gaps within PPS1 and PPS7.
Changes to be consistent	For these reasons we object to this policy and seek its deletion as it fails to meet test of soundness as it is not consistent with national planning policy.
Attached documents	

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/5
Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	

Not effective	Gleeson supports the retention of Strategic Gaps where appropriate, however we consider that their designation should not be accompanied by inflexible policies that restrict all development within the gap. Gleeson advocate that proposals that incorporate development within the Strategic Gap are considered on a site by site basis as development associated with the Strategic Gap location may increase the quantum of public access onto land within the Strategic Gap which at present is mainly held under private ownership with access restricted to public rights of way. Gleeson would seek that a degree of flexibility is applied in the use of this policy as a broad brush policy that prevents all types of development would in our opinion be inappropriate and could be detrimental to the character of the land. Our comments are focused in particular on the strategic gap to the south of Nailsea and to the north of the railway line that provides a physical boundary to the landscape setting of Nailsea and also importantly providing a significant boundary between Backwell and Nailsea. Accordingly we do not perceive that the Strategic Gap within this location provides a feature that could not be provided as part of a residential extension to Nailsea. As part of a proposal open space provision and buffers could be utilised for the benefit of the landscape setting of Nailsea and also to provide a buffer on the northern side of the railway line to reduce any potential impact from long distance views into Nailsea from the south. In contrast where there are no physical features to prevent coalescence or a perception of coalescence, for example between Weston-Super-Mare and the Weston Villages then this Strategic Gap should be viewed in a different light. It is for this reason that we would advocate that this policy is applied on a site by site basis and that the details within proposals are taken into account accordingly.
Changes to be effective	Gleeson would seek that a degree of flexibility is applied in the use of this policy as a broad brush policy that prevents all types of development would in our opinion be inappropriate and could be detrimental to the character of the land.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent Hutton Garden Centre

Respondent Name	Hutton Garden Centre
Comment ID	4601633/CSPV/2
Respondent Organisation	Hutton Garden Centre
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Objection is raised to Policy CS19. This is vaguely worded, with no precise objective and inadequate justification. The policy says that the intention is to retain the separate identity, character and/or the landscape setting of settlements. The text to the policy then says that reliance on countryside policies alone would be unlikely to provide sufficient protection. There is no reasoning produced that supports such an assertion. Normal policies that relate to development in the countryside are sufficient to control unacceptable development, as is the defining of settlement boundaries. Those policies will allow acceptable development, and prevent unacceptable development that might threaten the identity, character or landscape. Policy CS19 hints at 'added protection' to certain areas of the District, without specifying what that added protection might be. It is unreasonable to lay a framework for additional controls without saying what those controls may be, nor where they may apply. In addition, the whole basis of this policy is rather undermined by the fact that areas of potential Strategic Gap are identified as land outside Weston super Mare. Large tracts of that land are, of course, currently open and designated for development. The retrospective fitting of some concept of Strategic Gap on land not first allocated for development is somewhat putting the cart before the horses. This illustrates that there is no need for a Strategic Gap policy: if the detailed master-planning of the Weston allocations are going to identify areas to be retained as being open, there is no need to then have a policy which seeks an aspiration to later designate land as a Gap.</p>

Changes to be justified	Policy CS19 is therefore unnecessary, since adequate protection is provided for the countryside, and is not sufficiently justified. It should be deleted.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	CS19 response from Hutton Garden Centre (179Kb)

Respondent Long Ashton Parish Council

Respondent Name	Long Ashton Parish Council
Comment ID	1014881/CSPV/4
Respondent Organisation	Long Ashton Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/14
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West Transport Network

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/5
Respondent Organisation	South West Transport Network
Do you consider this part of the Core Strategy to be sound?	No
Not justified	This should also include a strategic gap between Ashton Vale, Ashton Gate and Long Ashton.
Changes to be justified	To protect Long Ashton and Ashton Vale from urban extension. When roads and rapid transit schemes are built over this green lung.
Not effective	Because the RSS allocated this site and road and rapid transit infrastructure to provide a new town called Yanley.
Changes to be effective	The protection of the green belt and green lungs in this corridor and re-evaluation of the need for rapid transit and the south bristol Link, CS10.
Not consistent with national policy	New governments localism bill and Green Belt policy.
Changes to be consistent	Protection of land around Ashton Gate, Long Ashton, Backwell inline with sub regional planning policy of the West of England partnership.
Attached documents	

Section CS20

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/2
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS 20 is unsound as it fails to provide a robust policy for securing an employment-led development strategy that will rebalance the homes/jobs ratio in WsM and NS as a whole by not providing specific actions and measurable targets and by providing mechanisms that will circumvent the priority objective in challenging circumstances.
Changes to be justified	Please see attached form.
Not effective	The 2nd paragraph sets out clearly the objectives that are necessary to provide more sustainable growth in NS and to rebalance the major imbalance between homes and jobs that exists across NS. This is supported. In practice, the delivery of these objectives will require a variety of policy initiatives in different parts of NS, as it is not a 'one size fits all solution' indeed if it was, this would be the least effective and deliverable solution to what is becoming a significant challenge to the Council.
Changes to be effective	Please see attached form.
Not consistent with national policy	Please see attached form.
Changes to be consistent	Please see attached form.

Attached documents

[Ashton Park CS20 response.doc](#) (86Kb)

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/8
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We object to Paragraph 3.261 which states that development contributions will be sought towards an Employment Investment Fund. Such funds should only be sought if it does not impact on the viability of the proposed development taking into account any other potential contributions. The suggested contribution would also fail the tests of Circular 05/2005 as: it is unspecific because it can not be guaranteed that the contribution would deliver jobs; there is no detail on how it would support employment development; there is no explanation how the proposed contribution would be related to the scale of proposed development and there is no information on how the contributions would be managed and who would use it.
Changes to be justified	We propose that paragraph 3.261 is deleted. We also propose the deletion of the reference to local needs only in the Policy box
Not effective	We object to the 1.5 jobs per dwelling approach as it is firstly imprecise, because it is not clear whether this statement relates to: 1. Gaining planning permission for employment floorspace of a set quantum i.e. 100 homes and a consent for a building with

	<p>sufficient space to deliver 150 jobs; 2. A requirement to build speculatively an employment building to release a set quantum of housing; and 3. Employing 150 people directly to deliver 100 new homes. Secondly the proposed phasing approach is fundamentally flawed because a housing developer can bring forward housing sites, but they can not guarantee the delivery of new employment. Speculatively building an employment unit at the outset of any development, in order to complete a proposed housing development is considered to be highly likely not to be commercially viable. The provision of employment space should be based upon a market led approach. Through providing employment development as a speculative development, it is unlikely to fully predict the needs of specific potential occupiers. Many businesses are looking to purchase land or prefer design and build opportunities rather than existing or newly built premises when expanding as they are better able to ensure the premises fit their business needs. This can also have the benefit of encouraging Thirdly, setting aside the viability issues, there are fundamental, practical planning questions on the ability to deliver 1.5 jobs per home, which include: · What is the definition of a job? Does this equate to part time jobs, full time jobs? · Would a "job" equate to a new job created directly in a place of employment? · How is the provision of 1.5 jobs to be measured? · Would this only apply to permanent jobs? · The construction of the housing and employment development itself will provide employment directly · It does not take account of the increasing proportion of people who now work remotely from home</p>
<p>Changes to be effective</p>	<p>We propose that Yatton should be identified as a location suitable for the delivery of additional employment development for up to 10 ha of B1, B2 and B8 uses. The policy requiring 1.5 jobs per home is deleted and employment land should be delivered through a market led approach.</p>
<p>Not consistent with national policy</p>	<p>The Core Strategy seeks to provide at least 10,100 additional employment opportunities 2006 - 2026, including around 114 hectares of land for B1, B2 and B8 uses. However over 80 hectares is proposed to be provided within Weston Super Mare with only limited opportunities for infill development upon largely previously developed land within Portishead, Clevedon and Nailsea. This approach clearly denies the opportunity to deliver economic development and prosperity to the rest of the District. This is completely out of alignment with the Government's objective for economic growth and prosperity set out within PPS4 (paragraph 10) which is to: "Build prosperous communities by improving the economic performance of cities, towns, regions, sub-regions and local areas, both urban and rural." The Core Strategy therefore fails to follow the guidance of PPS4 and ensure the delivery of Prosperous communities and economic development across the whole of the District. As identified earlier and in respect to our representations on Policy CS23, we consider that Yatton should also be identified under this policy, as it complies with the requirements of this settlement category as it: has an existing employment base and potential for further growth; has a range of services and facilities and is accessibility by modes of travel other than the private car. We also object to the Policy because with regards to the Remainder of North Somerset it is limited to meeting local needs. This does not comply with the requirements of</p>

	PPS4 which seeks to deliver employment opportunities. Accordingly it is not appropriate for the Core Strategy to suggest that these settlements should only meet local employment needs.
Changes to be consistent	We propose that Yatton should be identified as a location suitable for the delivery of Additional employment development for up to 10 ha of B1, B2 and B8 uses. We propose that the reference to only meeting local need in the rest of the District and the three towns is deleted.
Attached documents	Bloor response CS20.docx (26Kb)

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/7
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/6
Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent Highways Agency (R Davies)

Respondent Name	Highways Agency (R Davies)
Comment ID	4603585/CSPV/2
Respondent Organisation	Highways Agency

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The agency notes the reduction in the proposed level of growth for Weston-super-Mare compared with the consultation draft version published previously. In theory this should produce less growth in traffic and, in turn, less pressure on the safety and efficiency of M5 J21. However, we have not seen any evidence to show what impacts the revised development and its associated traffic would have on the junction and what possible mitigation might be required, other than the identified Weston package which may or may not receive funding. As stated above, we welcome the often repeated reference to employment led development within WsM to redress the imbalance between the available working population and employment opportunities within the town. We note the aim to deliver 1.5 use class jobs per home to support the employment led approach. What remains unclear at this stage is how an employment led strategy will be delivered. we do not readily see the evidence base to demonstrate how this approach will be delivered nor the evidence to show that 1.5 jobs per home is a reasonable expectation. There are no clear policies which will limit the release of housing in line with jobs. In this respect it is not clear that this employment led approach is deliverable and therefore could be unsound. We welcome the commitment that strategic development will not be permitted to the east of the M5 at Weston-super-Mare. Such development would in our view be unsustainable by not being well related to Weston and inconsistent with the stated approach of increasing self-containment. See attached document for the full representation.
Changes to be effective	
Not consistent with	

national policy	
Changes to be consistent	
Attached documents	Highways Agency response.pdf (589Kb)

Respondent Martyn Leisure

Respondent Name	Martyn Leisure
Comment ID	3583521/CSPV/4
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	Our client, Martyn Leisure, recognizes the importance of supporting a successful economy by encouraging economic development. Whilst the general thrust of Policy CS20 is supported, it is notable that that the policy does not recognise the benefits that the tourism industry brings to maintaining and delivering a prosperous rural economy having regard to PPS4. Under 'The Remainder of North Somerset', the text should positively reflect the benefits of supporting tourism facilities which might be outside of Weston-super-Mare, particularly as this need to improve facilities is recognised in the supporting text to Policy CS22 (notably paragraph 3.281 of the Publication Draft). Tourism meets more than "locally identified needs" and therefore care should be taken in drafting this policy so as to ensure that local rural economies are not prejudiced or adversely affected - especially where tourism is a key source of prosperity.
Changes to be consistent	Martyn Leisure requests that the text under the heading 'Remainder of North Somerset' be amended as follows: "Elsewhere, proposals that encourage economic activity appropriate to the scale of a settlement and its neighbouring area will be approved (Delete: within settlement boundaries) where this leads to greater self containment, is compatible with the character of the area and supports (Delete: meets) local and, where relevant, wider identified needs."
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/11
Respondent Organisation	Origin3
Do you consider this	No

part of the Core Strategy to be sound?	
Not justified	We raise serious concerns about the justification and robustness of Policy CS20 when considering the ratio of employment provision required of residential developments above 10 dwellings and the detrimental impact this could have on the delivery of needed housing, affordable housing and relevant infrastructure. The dwelling to employment ratio identified within CS20 is not responding to or founded upon a reliable and credible evidence base, as required by PPS 12: Development Frameworks. It is unclear where the figures contained within Policy CS20 emphasising 1.5 B use class jobs per home has been derived from. Where the Council has relied on previous work for the Draft Core Strategy to justify the proposed job ratio, the same procedure has not been conducted for residential development, incorporating a significant reduction in provision. Therefore a lack of consistency and credibility exists within the Policy. See full representation attached for detailed comments.
Changes to be justified	The reliance entirely upon linking residential development growth to forecast employment growth should be re-considered. Provision of adequate housing to match employment provision should be incorporated.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Parish Councils Airport Association (Burn)

Respondent Name	Parish Councils Airport Association (Burn)
Comment ID	1010593/CSPV/4
Respondent Organisation	Parish Councils Airport Association
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The PCAA question whether expansion at Bristol Airport will bring a more prosperous economy to North Somerset or regenerate Weston super Mare. The Tym Economic Impact Report gave figures from CAA surveys which showed reductions in business travel from 19.8 % in 2003 to 13.34 % in 2008 at Bristol Airport. The report continues that the business sector may further reduce to about 9.6% by 2019/2020. This shows that leisure passengers dominate and will continue to dominate in the future. The airport predominantly serves the low cost leisure market on short haul routes increasing the outward bound tourist deficit, see response to CS22 The PCAA accepts that expansion will provide some new direct jobs of between 800 -900 jobs over a 10 year period at the airport. These, together with possible induced jobs, might equate to 3000+. Without expansion airport employment would not change significantly, as recognised in the airport's Economic Impact Assessment. This comment also relates to Vision 1 and Priority Objective 3, 5 and 6.
Changes to be justified	The number of direct and induced jobs from airport expansion must be identified and recorded in order that this information is available for any future planning application. Induced jobs must be shown to reflect North Somerset and the wider region the South West. The number of jobs lost to the outward tourist deficit should also be identified and be considered in any future planning decision.

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/20
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	<p>This policy is not justified or effective. Our first observation is that employment-led is an Objective, but the Policy needs to ensure that it is deliverable and practical. Therefore, providing employment in step with, or phased with residential is more appropriate and we seek the deletion of the employment-led Objective from the Policy. It is emphasised that this is to make the Policy more workable, not to seek to remove the relationship between employment and residential, which Persimmon is already implementing at Weston-super-Mare. Our Second observation is that the figures simply do not work if at Weston Villages employment allocation is to be phased with residential. 5,500 houses are allocated at Weston Villages which at 1.5 jobs per house would require 8,250 jobs. However, Paragraph 3.256 proposes 37.70 Hectares of employment at Weston Villages, which using the employment density figure in Policy CS20 (10,100 additional employment opportunities on 114 Hectares equals 88.6 jobs per Hectare), would produce 3,342 jobs which at 1.5 jobs per house would require 2,228 houses. Therefore, the houses cannot be phased with jobs at the required rate and on this basis the rate is 0.61 jobs per house (5,500 houses divided by 3,342 jobs). This needs to be taken into account in the phasing of the housing with the employment. The only substantial new residential allocations are at the Weston Villages where we demonstrate above the strategy does not work. Elsewhere the majority of the houses arise from existing commitments and most of the "new employment" comes from existing allocations. So there are no opportunities for a plan-led relationship between provision of new houses on the basis of 1.5 jobs per house, because both housing and employment is already committed. See full representation attached for more detail comments.</p>
Changes to be justified	<p>We seek the deletion of the employment-led Objective from the Policy. See full representation attached for more detailed comments.</p>
Not effective	<p>This policy is not justified or effective. Our first observation is that employment-led is an Objective, but the Policy needs to ensure that it is deliverable and practical. Therefore, providing employment in step with, or phased with residential is more appropriate and we seek the deletion of the employment-led Objective from the Policy. It is emphasised that this is to make the Policy more workable, not to seek to remove the relationship between employment and residential, which Persimmon is already implementing at Weston-super-Mare. Our Second observation is that the figures simply do not work if at Weston Villages employment allocation is to be phased with residential. 5,500 houses are allocated at Weston Villages which at 1.5 jobs per house would require 8,250 jobs. However, Paragraph 3.256 proposes 37.70 Hectares of employment at Weston Villages, which using the employment density figure in Policy CS20 (10,100 additional employment opportunities on 114 Hectares equals 88.6 jobs per Hectare), would produce 3,342 jobs which at 1.5 jobs per house would require 2,228 houses. Therefore, the houses cannot be phased with jobs at the</p>

	required rate and on this basis the rate is 0.61 jobs per house (5,500 houses divided by 3,342 jobs). This needs to be taken into account in the phasing of the housing with the employment. The only substantial new residential allocations are at the Weston Villages where we demonstrate above the strategy does not work. Elsewhere the majority of the houses arise from existing commitments and most of the "new employment" comes from existing allocations. So there are no opportunities for a plan-led relationship between provision of new houses on the basis of 1.5 jobs per house, because both housing and employment is already committed. See full representation attached for more detail comments.
Changes to be effective	We seek the deletion of the employment-led Objective from the Policy. See full representation attached for more detailed comments.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/15
Respondent Organisation	Portbury Parish Council

Do you consider this part of the Core Strategy to be sound?	No
Not justified	While being in agreement with the basic ethos of this policy CS20, in paragraph Clevedon, Nailsea and Portishead the word 'primarily' should be removed, to ensure the take up of allocated land, to prevent encroachment into the Green Belt,thus making the policy planning-led not developer-led.Preservation of allocated sites from housing development is essential to meet the objectives of this policy, particularly in Portishead.
Changes to be justified	Clevedon, Nailsea and Portishead Remove 'primarily' thus: Within Clevedon, Nailsea and Portishead new development will be supported on allocated land with a key objective of improving self containment, and reducing out-commuting.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name South West RP Planning Consortium

Comment ID	4209025/CSPV/11
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	As previously stated, whilst we fully support the Council's attempt to provide more jobs in the district, we do not consider that housing development can support this policy aim. As per Circular 05/05 planning contributions can not be used to solve existing problems within the district and must be directly related to the development. We are unaware of any other authority that has attempted to require housing developers to provide employment land on site as a minimum policy requirement. Development in itself creates jobs and so we can not see the justification for this policy and strongly recommend that it is dropped altogether.
Changes to be justified	Strongly recommend that this policy is dropped.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents[South West RP Planning Consortium](#) (72Kb)**Respondent South West Transport Network**

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/6
Respondent Organisation	South West Transport Network
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Should include upgrading the rail network including the Greater Bristol metro and electrification of the main line from Weston-super-Mare central station to Bristol and London including the Greater Bristol Bus network.
Changes to be justified	Coalition government policy on sustainable transport and rail electrification.
Not effective	Priority should include the LEP policy Local Enterprise Partnership and West of England Partnership plans to upgrade the rail network.
Changes to be effective	Rail policy statement added to the priority objectives including electrification Great Bristol Rail network.
Not consistent with national policy	Sustainable Transport White paper government policy on local enterprise agency.
Changes to be consistent	Including detail of transport white paper, sustainable transport PPS13.
Attached documents	

Respondent Volaw Corporate Trustees (Wyg Planning & Design)

Respondent Name	Volaw Corporate Trustees (Wyg Planning & Design)
Comment ID	3322817/CSPV/3
Respondent Organisation	Wyg Planning & Design
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	The Volaw Corporate Trustees and the Volaw Trustees (112Kb)

Section CS21

Respondent Banwell Parish Council

Respondent Name	Banwell Parish Council
Comment ID	3984769/CSPV/4
Respondent Organisation	Banwell Parish Council

Do you consider this part of the Core Strategy to be sound?	No
Not justified	In Section 4(b)"the vitality and viability of the following hierarchy of existing and proposed centres will be maintained and enhanced", all of the service villages except Banwell are listed. Banwell Parish Council is concerned that this would imply a lesser level of protection of Banwell's retail provision which is already under considerable pressure with a number of shops having closed in recent times.
Changes to be justified	Banwell should be afforded the same level of protection as all the other sevice villages as it is illogical to exclude it.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/7

Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/18
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No

Not justified	We raise concerns with regard to the future retail hierarchy set out in Policy CS21, particularly the lack of consistency with regard to town centre uses when compared with other policies in the Core Strategy. The Policy does not provide a clear definition of 'Local Centres' or 'District Centres' when considering the role of the proposed new Centres at the Weston Villages. The Weston Villages have been designated 'Local Centres' within Policy CS21 which are identified in the text as measuring 300 sq. m. The uses and size of Centres proposed at the Weston Villages would extend far beyond the 300sq.m size of designated 'Local Centres' and even the 500sq.m that 'District Centres' measure if they are to accommodate the uses set out in Policy CS30 of the Core Strategy. The Weston Villages Centres will not reflect the scale or form of a 'Local/District Centre' and should be moved up the retail hierarchy set out in Policy CS21. The Policy states that proposals for Town Centre uses outside the listed centres will not be prioritised. Given that B1 uses are considered town centre uses under Policy EC.1 of PPS4, there is a serious conflict with other Policies within the Core Strategy, particularly CS20 and CS30, which promote extensive and excessive B1 uses outside of Town Centres at the Weston Villages.
Changes to be justified	The Weston Villages Centres should be moved up the retail hierarchy given that their characteristics will be greater than the thresholds set out for 'Local' and 'District' Centres. Their size should be determined through local planning of the Weston Villages through the future SPD document.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd (282Kb)

Respondent Volaw Corporate Trustees (Wyg Planning & Design)

Respondent Name	Volaw Corporate Trustees (Wyg Planning & Design)
Comment ID	3322817/CSPV/4
Respondent Organisation	Wyg Planning & Design
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	The Volaw Corporate trustees and Volaw Trustees (112Kb)

Section CS22**Respondent** AGM Holdings Limited (M Michael)

Respondent Name	AGM Holdings Limited (M Michael)
Comment ID	1017825/CSPV/1

Respondent Organisation	AGM Holdings Plc
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	AGM Holdings Ltd (4.2Mb)

Respondent Martyn Leisure

Respondent Name	Martyn Leisure
Comment ID	3583521/CSPV/2
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No

Not justified	Our client, Martyn Leisure, considers that some provisions within paragraph 3.286 are unsubstantiated by evidence and therefore are unhelpful in the supporting rural communities, specifically through tourism. Whilst it is important that tourism development should not result in significant adverse impacts, there is concern that an unjustified generalization has been stated suggesting that an over-concentration of holiday accommodation in small rural communities could create an adverse impact. In considering wider tourism issues, it is requested that this paragraph be amended in the context of the wider objections made by Martyn Leisure and policy in PPS4.
Changes to be justified	Martyn Leisure requests that Paragraph 3.286 be amended as follows: "In accordance with the Blue Skies Strategy the increase in tourism activities will be concentrated in Weston-super-Mare. However, provided that proposals do not conflict with Green Belt, sustainable development and environmental policies or lead to other potential impacts such as the effect of further (deleted: as through an inappropriate over-concentration of) holiday accommodation in small rural communities, then an increase in tourism will be supported in the district."
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	
Respondent Name	Martyn Leisure

Comment ID	3583521/CSPV/5
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	Our client, Martyn Leisure, submitted representations to Policy CS22 in Consultation Draft Core Strategy. This amended Policy does not add clarity in respect of the approach that North Somerset Council will take to the provision of new facilities and accommodation. It would be sensible that this is explicit within the policy to ensure that planning applications that support the provision of new or replacement visitor and tourist facilities and accommodation can be considered within a positive policy context. This is consistent with guidance within PPS1 and in accordance with the thrust of PPS4. It is important that the Core Strategy presents a positive and helpful planning policy which will reflect a commitment to development which can support and contribute to economic growth - and one which specifically assists the tourism sector.
Changes to be consistent	Martyn Leisure requests that the text under the heading Remainder of North Somerset be amended as follows: (delete: Visitor facilities and accommodation will be supported across the district provided they:) New, improved and replacement visitor and tourist facilities and accommodation will be supported across the district provided they: 1. 2. 3."

Attached documents

Respondent Parish Councils Airport Association (Burn)

Respondent Name	Parish Councils Airport Association (Burn)
Comment ID	1010593/CSPV/6
Respondent Organisation	Parish Councils Airport Association
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>There is no mention throughout CS22 that Bristol Airport is predominantly a leisure-based airport and further expansion will grow the tourist deficit. A CAA survey shows business use of BA dropping from 13.3% to 9.6% in 2020, thus the expansion of the airport cannot be linked to business demand. This means that more money is going out of the South West region and North Somerset District, away from the regeneration of Weston super Mare. The South West region including Weston super Mare depends on tourism for jobs and for much of its economy. With the recession the airport has seen a drop of passengers of 18% (Ref: Evening Post 15 July 09) since the beginning of the year and at the same time there has been an increase of tourism to North Somerset area (Ref: http://www.southwestbusiness.co.uk/tourism/Staycation-boosting-North-Somerset/article-1140082-detail/article.html). 'People foregoing foreign holidays are providing a much-needed boost to North Somerset's £300 million tourism industry. The so-called 'staycation' trend is seeing record numbers of people visiting the district's top attractions. According to North Somerset Council's tourism team, Clevedon Pier is reporting a 14 per cent increase in visitors, Tyntesfield a 10 per cent boost and the SeaQuarium in Weston a 12 per cent rise. Weston's Tourist Information Centre has seen 61 per cent increase in</p>

	visitors, mainly due to the Wheel of Weston.' This demonstrates that increasing leisure flights is detrimental to the tourist industry in the South West and Weston super Mare. This comment also relates to Vision 1 and Priority Objective 5. SEE ATTACHED.
Changes to be justified	Point 3.289: Monitoring and review needs to include the tourist deficit i.e the numbers of outward bound and inward-bound tourists. Monitoring should take place on an annual basis and be measured against the objective of 'delivering a prosperous economy'. This should reflect the number of jobs created by an increase of inbound tourists and the loss of jobs to outward bound tourists.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	CS22 response from Parish Councils Airport Assoc.doc (72Kb)

Section CS23

Respondent Avon Wildlife Trust

Respondent Name	Avon Wildlife Trust
Comment ID	1045217/CSPV/1
Respondent Organisation	Avon Wildlife Trust
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	The Trust responded to the proposed expansion of Bristol Airport in 2009 with great concerns about the impacts on local wildlife and habitats. Policy Paragraph 3.294 refers to the fact that development of the airport is led by its owners, whose responsibility is to ensure that the environmental impacts of growth are satisfactorily addressed. The Trust recognises that the Council's preference is to develop an Area Action Plan or other development plan document for any additional development at the airport and the Trust supports this stance. However, Policy CS23 should be strengthened to mention explicitly the impact of growth on the natural environment. This will ensure that there is internal coherence between this and other relevant policies such as CS1 and CS4.
Changes to be consistent	Policy CS23 should be amended so that proposals for the development of the airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of...growth on the natural environment.

Attached documents

Respondent Barrow Gurney Parish Council

Respondent Name	Barrow Gurney Parish Council
Comment ID	4618561/CSPV/1
Respondent Organisation	Barrow Gurney Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	This is currently written as an enabling policy. There is robust and credible evidence to justify a more strongly worded restrictive policy. The wording of CS23 is not sufficiently robust to protect local communities that are already seriously disadvantaged and threatened by the growth of airport traffic. Further airport growth must not be permitted without major infrastructure development and the wording of this section must clearly reflect this. Previous policies have not adequately protected local communities, particularly in respect of surface access traffic.
Changes to be justified	Proposed wording of CS23: Further development of Bristol Airport will not be permitted unless the satisfactory resolution of environmental issues has been demonstrated, including the impact of growth on surrounding communities and surface access infrastructure. The Airport Operator will be required to demonstrate ongoing monitoring of and action to remedy impacts in this respect.

Not effective	Existing communities are already suffering unacceptable conditions in intimidation, threat to safety of pedestrians, cyclists and equestrians, in shared use of highway and crossing the highway occurring both during the day and at night, and this situation must not be allowed to deteriorate further. The wording does not demonstrate how control of this situation will be implemented and monitored.
Changes to be effective	3.296 Environmental Traffic Impact Assessments must be carried out for all localities defined as Sensitive under accepted national guidelines. Situations must be monitored against parameters identified in the Environmental Traffic Impact Assessment. Targets for public transport use must be set and monitored and actively managed to ensure compliance by the operators.
Not consistent with national policy	The Air Transport White Paper contains significant safeguards for the impact of airport expansion on local communities, in particular the need for highways infrastructure to mitigate the impact of airport traffic and the obligations of airport operators in this respect. These have not been reflected, only the permissive aspects of the White Paper have been reflected in the wording.
Changes to be consistent	Proposed changes to wording: 3.290 The 2003 Air Transport White Paper supports the development of Bristol Airport to accommodate up to 12 million passengers per annum (mppa) by 2030. However safeguards are included to ensure that airport expansion does not cause unacceptable impacts on local communities. Airport operators are required to bring forward infrastructure schemes to mitigate the effects of their expansion on the highways network.
Attached documents	

Respondent Bristol Airport

Respondent Name	Bristol Airport
Comment ID	1051265/CSPV/2
Respondent Organisation	Bristol International Airport

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	<p>Paragraph 3.292 of the Publication Version identifies that NSC expect development beyond 2011 to be subject of an Area Action Plan or other development plan document. Bristol Airport does not consider that the preparation of an Area Action Plan (AAP) covering further development at the Airport is appropriate. The longer term development needs of the airport have already been established through the Air Transport White Paper and will be delivered via the recently granted planning permission. Paragraph 3.292 identifies that Policy T/12 of the Replacement Local Plan will remain in place, until the adoption of an AAP. Bristol Airport considers that it is inappropriate to continue with Policy T/12 as a saved policy. Following the recent grant of planning permission, which provides sufficient development for the growth of the airport to 2019, Policy T/12 has now been superseded. A new site specific policy outlining the Council's vision for Bristol Airport should be prepared to replace Policy T/12. To enable the delivery of a new site specific policy, Policy CS23 should be amended to provide a clear vision outlining the important role the airport will play within the plan period. This vision would then form the basis for the new site specific policy to be provided in a Development Management DPD. At the present, in our view, the current wording of Policy CS23 provides no clear vision for Bristol Airport and this will make it difficult for NSC to draft either an AAP or a further policy in subsequent DPDs. Our concern is that without a clear vision for the Airport, future Airport policies will have little guidance from the Core Strategy and run the risk of being found unsound should they seek to introduce new policies that are not signposted in the Core Strategy. As currently drafted Policy CS23 could potentially leave a significant policy vacuum covering the Airport.</p>
Changes to be effective	<p>Recommended amendments to Policy CS23: The Council supports the important role Bristol Airport plays as a key transport hub and significant local employer within North Somerset and beyond. Within the plan period we expect the owners of the airport to implement their planning permission and provide enhanced facilities to cater for a throughput of 10 million passengers per annum. Any further development needs at the airport are likely to be operational and delivered within the boundary of the planning</p>

	permission, and will be brought forward through a new policy in the Development Management Development Plan Document. This new policy will support a local amendment to the Green Belt to reflect the planning permission and seek to balance the advantages of economic growth with the need to control the impacts on those who live nearby and on the natural environment.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Bristol Airport response.doc (60Kb)

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/12
Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No

Not justified	The use of the word 'satisfactory' is unsatisfactory. It is a source of unsoundness in the document. Ambiguity is introduced by the absence of a definition of 'satisfactory' and a failure to clearly attribute to the Council the responsibility for determining what is satisfactory. The Strategy's preface states that to be sound the Strategy must be effective. Ambiguity in the Strategy detracts from the effectiveness and thereby detracts from its soundness. Para 3.294 is of particular concern in this regard as it allows the interpretation that the airport owners are responsible for deciding what is environmentally satisfactory. This comment also relates to Visions 1 and 7 and Priority Objectives 2,7 and 9.
Changes to be justified	To improve the soundness of the document a change of wording is required along the lines of 3.51, which is specific that the Council must be the satisfied partner, not the owners.
Not effective	North Somerset Council at Para 3.292 expresses intention to expand its Airport policies by way of an Area Action Plan. CPRE supports this approach for more detailed policies in relation to Bristol Airport.
Changes to be effective	Para 3.293 states that car parking is regulated by Replacement Local Plan Policy T/12. As the LDF is supposed to replace the RLP and consequently, for the Core Strategy to be sound, the car parking aspects of T/12 should be carried forward to the LDF but the Core Strategy does not state how that is to be achieved.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Milward

Respondent Name	Milward
Comment ID	4602881/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	<p>Policy CS 23 conflicts with national policy in the form of Section 40 of the Natural Environment and Rural Communities Act 2006, which confers a statutory duty on all public bodies to conserve biodiversity. The further development of Bristol Airport, with a consequent increase in noise, light and atmospheric pollution, is likely to materially affect the important habitats (ancient woodland) and species (bats) covered by the adjacent Kings Wood and Goblin Combe SSSIs and Avon and Mendip Bats SAC. Until ecological monitoring proves that this is NOT the case, the Core Strategy should adopt a precautionary principle of permitting no further Airport development. In addition, the Coalition Government's 'Programme for government' of last May stated that "We will introduce measures to protect green spaces and wildlife corridors in order to halt the loss of habitats and restore biodiversity" and "We will push for the EU to demonstrate leadership in tackling international climate change, including by supporting an increase in the EU emission reduction target to 30% by 2020". The further expansion of Bristol Airport is likely to</p>

	harm wildlife & habitats, eat into green space, constrain wildlife corridors and increase emissions - both directly from more flights and indirectly through greater numbers of passenger access vehicle movements. The outdated Air Transport White Paper 2003 is not completely out of step with the more recent emissions constraints of the Climate Change Act 2008' and further development of Bristol Airport can not be considered in accordance with National policy.
Changes to be consistent	I would like to see Policy CS23 changed to read "Proposals for development of Bristol Airport will be required to demonstrate that they will have no detrimental effect on the natural environment, no impact on surrounding communities and no adverse effect on access infrastructure".
Attached documents	

Respondent Parish Councils Airport Association (Burn)

Respondent Name	Parish Councils Airport Association (Burn)
Comment ID	1010593/CSPV/1
Respondent Organisation	Parish Councils Airport Association
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The view on 'leakage' is misguided. Offering more flights from BA (in order to prevent leakage) will actually induce more people to fly and higher emissions (particularly short-haul) which is not the intended consequence. This can be seen in the EKOS report commissioned by the South West Regional Development Agency 'Informing Sustainable Aviation Policy for the SouthWest'. The

	<p>PCAA believes that no evidence on this point has been gathered by North Somerset Council. (3.290) The Climate Change Act 2008 will constrain growth in aviation in the period to 2026 although currently the aviation sector is still being treated as a special case. A robust and credible approach would consider that the Act should be reflected in the Core Strategy with requirements for BA to reduce their emissions if they wish to expand. (3.291) This comment also relates to Vision 1 and Priority Objective 3.</p>
Changes to be justified	<p>Expansion should be linked to: (i) the green house gas emissions associated with Bristol airport including those related to increased passenger journeys to and from the airport and its flights, and (ii) the level of "tourist deficit", i.e. the relative numbers of outward-bound and inward bound tourists.</p>
Not effective	<p>The Core Strategy does not take account of car parking data from other airports. BA will have 2000 spaces per mppa compared with Stansted (1,700), Manchester (622), Heathrow (511) and much lower figures at overseas airports, including Hong Kong (146). Generous allowance at BA will do little to encourage use of public transport. The offsite car parking policy is acceptable to PCAA but the use by BA of green belt space for car parking is unacceptable, especially when other offsite locations have been turned down for green belt reasons. BA has no superior right to use green belt land. (3.293) Monitoring and review of the airport's activities is weak. It should be clearly stated that no further increase in passenger numbers should be allowed if improvements are not delivered as outlined in the planning conditions. (3.296)</p>
Changes to be effective	<p>Car parking should be restricted more tightly and prevented from encroaching on green belt land (for reasons outlined above). An Area Action Plan is welcome but must take into account the cumulative impacts of road traffic and noise from a base line of 5 mppa. (3.292) Further expansion should not be allowed if previous conditions have not been met in order to reduce the negative impact on local communities.</p>
Not consistent with national policy	<p>The ATWP is an out-of-date, top-down approach to airport policy and contrary to the government's current policy of enabling local decision-making, evidenced in the move towards 'Localism' and the Big Society. (3.290)</p>
Changes to be consistent	<p>The ATWP is being reviewed. The PCAA has contributed to the scoping report which will be followed by public consultation. New Aviation policy will then be announced. The Core Strategy considers the period to 2026 and every effort should be made to ensure that this is aligned with emerging national policy. The Department for Transport is remodelling its passenger forecasts for aviation and these figures are expected to be published summer 2011. Predicted passenger numbers may fall due to a lowering of</p>

GDP growth throughout the UK. This would result in slower growth and may mean that the airport's plans for development are not necessary. The PCAA requests that the Government's new forecasts are used. (3.290)

Attached documents

Respondent South West Transport Network

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/7
Respondent Organisation	South West Transport Network
Do you consider this part of the Core Strategy to be sound?	No
Not justified	This policy fails to outline the surface access strategy for public transport at Bristol airport CS10.
Changes to be justified	The Policy fails to outline alternative to the private car to access the airport such as rail air coach services to Bristol TM Bristol bus station, Clifton or Weston-super-Mare.
Not effective	The policy should include investment in coach services to Bristol airport and rapid transit links to Bristol via Ashton Vale, ultra light rail.
Changes to be effective	Look at new rail station at Flax Bourton. Their need to a proper access strategy to Bristol airport by public transit, Rapid Transit coach links to Bristol Bath Worle and Weston-super-Mare.
Not consistent with national policy	National Transport policy on access to airports by public transport and parking policy.
Changes to be consistent	Their need to be an improved transport network to the airport. Airport access strategy for transport included within the plans as part of the Greater Bristol/West of England partnership transport plan.

Attached documents

Section CS24

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/18
Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	CPRE are concerned that Para 3.299 allows the interpretation that the port owners are responsible for deciding when the environmental impacts of growth have been satisfactorily addressed. This comment also relates to Vision 1 and Priority Objectives 2 and 7.
Changes to be justified	Para 3.299 should be rephrased and the ambiguity would be improved if a change of wording along the lines of 3.51 is made to clarify that the Council must be the satisfied partner, not the owners.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents**Respondent Portbury Parish Council**

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/16
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West Transport Network

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/8
Respondent Organisation	South West Transport Network

Do you consider this part of the Core Strategy to be sound?	No
Not justified	The part of Bristol is economic drive of the Greater Bristol area and the south west/Midland region.
Changes to be justified	The policy prevent job and enterprise 3.29 contains the ports growth with it national rail links and infrastructure in bulk goods.
Not effective	We would like to see a more supportive policy toward the port of Bristol if freight access by rail and national trunk route.
Changes to be effective	The policy needs to allow for expansion of the port and the port rail network including passenger services for Portbury, Parkway and Portishead.
Not consistent with national policy	The safeguarding of land and development of the port is important to the Greater Bristol city region in Europe and the local enterprise partnership. The port needs to expand with good rail and ship transfer access.
Changes to be consistent	In a competing market with the ports of Felixstow, Southampton, Newport, Cardiff, Swansea, Bristol, Port must not be constrained. The new rail link terminal is welcomed.
Attached documents	

Section CS26

Respondent Avon and Somerset Constabulary

Respondent Name	Avon and Somerset Constabulary
Comment ID	1046721/CSPV/2

Respondent Organisation	Avon and Somerset Constabulary
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>CS26 and para 3.323. These and the Core Strategy approach (page 102) do not distinguish between 'residential' and 'community' treatment/rehabilitation and are founded on an evidence base which relates only to residential rehabilitation. In my view, the Core Strategy should make a clear distinction between 'residential' treatment provision and 'community' treatment provision. Residential rehabilitation services are private businesses which accept referrals from all over the UK and sometimes overseas. There are 289 beds within North Somerset premises which are linked to drug/alcohol treatment or support. Of these, 191 beds are within the 12 registered residential rehabilitation facilities which are regulated by the Care Quality Commission. Only a small proportion of this provision is utilised for placements from North Somerset Community Safety and Drug Action Team or Social Services. There are approximately 20 of these 'local' placements per annum. This supports the Core Strategy conclusion that there are 'more than enough of these services to meet the needs of the existing population'. In contrast, Community Drug Treatment Services are commissioned by the Community Safety Drug Action Team on behalf of the North Somerset Safer and Stronger Partnership Joint Commissioning Group (which I chair). These services are for North Somerset residents only. In 2009/10 these commissioned community services treated approximately 900 drug clients and 300 alcohol clients. The Safer & Stronger Partnership undertakes an annual assessment which identifies need, including unmet need to guide our commissioning decisions. The 2011/12 needs assessment includes prevalence estimates and referrals data which indicates an unmet need in North Somerset. I can advise you that the evidence base for community treatment does not therefore correlate with the Core Strategy conclusion "that there is more than adequate provision for the needs of the existing population.</p>
Changes to be justified	<p>I would therefore suggest that the word 'residential' be included in policy CS26 and para 3.323 to ensure that the policy is applied only to residential provision for 'out of area' clients. The statements in their current form could impact on the provision of (non-residential) community services for local people with drug and alcohol treatment needs which would only serve to create greater inequalities, not reduce them.</p>

Not effective	CS26 and para 3.323. The Core Strategy statements above appear not to meet the effectiveness test as they do not allow sufficient flexibility to meet the current and future health needs of North Somerset residents. This is because the statements do not reflect the evidence base in relation to local (non-residential) community treatment needs. This would be contrary to the overall aim to reduce health inequalities.
Changes to be effective	I would therefore suggest that the word 'residential' be included in policy CS26 and para 3.323 to ensure that the policy is applied only to residential provision for 'out of area' clients. The statements in their current form could impact on the provision of (non-residential) community services for local people with drug and alcohol treatment needs which would only serve to create greater inequalities, not reduce them.
Not consistent with national policy	CS26 and para 3.323 are also not consistent with national policy as set out in the following national strategies: · Healthy Lives, Healthy People: Our strategy for public health in England (2010). This document sets out the Government's approach to tackling health inequalities including drug and alcohol misuse and emphasises the future lead role of Local Authorities in delivering the public health agenda. This national strategy states "Public health professionals will work locally to prevent people from taking harmful drugs, to reduce the drug use of those already taking drugs and to help people to be drug free, recover fully and contribute to society". The current Core Strategy approach would not be consistent with this as it would not allow for the development of treatment provision to achieve these outcomes locally. · Similarly, the Core Strategy is not consistent with the National Drug Strategy (2010): reducing demand, restricting supply, building recovery. This strategy sets out the Government's approach to building recovery in communities (page 18): "We must therefore put the individual at the heart of any recovery system and commission a range of services at the local level to provide tailored packages of care and support. This means that local services must take account of the diverse needs of their community when commissioning services" The current Core Strategy approach would inhibit the development and commissioning of services to meet local needs. Community based services should be allowed to develop in the same way as other health services to meet local need. · A New Approach To Fighting Crime (Home Office 2011). This document sets out over-arching Government policy in respect of community safety. It includes a focus on 'getting to grips' with the causes of crime including drug and alcohol dependency. This is also at the heart of the National Reducing Re-Offending Strategy (2010) and the national guidance on Integrated Offender Management.
Changes to be consistent	I would therefore suggest that the word 'residential' be included in policy Cs26 and par 3.323 to ensure that the policy is applied only to residential provision for 'out of area' clients. The statements in their current form could impact on the provision of (non-residential) community services for local people with drug and alcohol treatment needs which would only serve to create greater inequalities, not reduce them.

Attached documents[Avon and Somerset Constabulary](#) (41Kb)**Respondent** Barrow Gurney Parish Council

Respondent Name	Barrow Gurney Parish Council
Comment ID	4618561/CSPV/6
Respondent Organisation	Barrow Gurney Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	On CS 26 health issues there is an issue in relation to the proposed new Care Village at Barrow Hospital and inconsistency to be addressed. Specifically there appears to be a conflict between CS26 Para 8 needs of an ageing population and Para 3.322 speculative new care homes which are likely to attract in-migrants will be discouraged.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	Barrow Gurney Parish Council letter CS10 and others (34Kb) Barrow Gurney Parish Council rep CS10 and others (63Kb)

Respondent Cleeve Parish Council

Respondent Name	Cleeve Parish Council
Comment ID	1045633/CSPV/1
Respondent Organisation	Cleeve Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Care Homes - the Council is concerned at this aspect of the report. It does not believe that sufficient consideration has been given to the importance of the elderly being able to go into care close to home, where family and friends can visit easily and frequently. With the Government's emphasis on an increase in care at home; the Council believes this will be more and more important. If the elderly are to be supported at home there will be an increasing need for respite care close enough to home for them not to feel abandoned. The need for nursing rather than residential care will also increase. Long journeys for elderly friends and relatives will mean a reduction in visits and increasing isolation for the most frail and sick. Over provision in the towns and larger service villages is likely to result in the closure of homes in the more rural areas, resulting in a further loss of amenity and choice in these areas, which are already short of services and often have a very high elderly population.</p>

Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/8
Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent Long Ashton Parish Council

Respondent Name	Long Ashton Parish Council
Comment ID	1014881/CSPV/5
Respondent Organisation	Long Ashton Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Long Ashton Parish Council is unhappy about point 8 of the policy. North Somerset should not be avoiding the need for residential care. From now on this need is going to greatly increase and North Somerset should play its part in accepting facilities. (The Government should address this problem, which will extend throughout the country and allocate finances accordingly). 3.322. Speculative new care homes, particularly if they are privately financed, should be welcomed not discouraged.

Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent NHS North Somerset PCT

Respondent Name	NHS North Somerset PCT
Comment ID	4602689/CSPV/1
Respondent Organisation	NHS North Somerset PCT
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	The evidence used to justify the statements referenced on page 20 (paragraph 8), page 100 (paragraph 9) and page 102 (paragraph 3.323) in relation to drug and alcohol rehabilitation facilities does not differentiate between residential rehabilitation facilities (i.e. those open to clients who live outside North Somerset) and those community rehabilitation facilities and services available only to North Somerset residents. The evidence suggests that in terms of residential provision there is 'more than enough' provision for local residents which is likely to be the case. However, if you consider recent local health needs assessments of local needs for provision of community drug and alcohol facilities and services available for local residents, the evidence appears not to support this argument. Therefore, I recommend that a distinction is made between the evidence of need and provision for residential rehabilitation facilities and services and community treatment services and facilities. If not, there is a risk that future community drug and alcohol service provision to meet local needs could be restricted by this policy.
Changes to be justified	I recommend that a distinction is made between the evidence of need and provision for residential rehabilitation facilities and services and community treatment services and facilities. If not, there is a risk that future community drug and alcohol service provision to meet local needs could be restricted by this policy.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	NHS North Somerset PCT response.doc (174Kb)

Respondent Parish Councils Airport Association (Burn)

Respondent Name	Parish Councils Airport Association (Burn)
Comment ID	1010593/CSPV/2
Respondent Organisation	Parish Councils Airport Association
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS26 has omitted protection of communities from the activities related to Bristol Airport such as increased noise and increased traffic volumes which cause health and social damage. Evidence is available that airport noise causes severe stress and higher blood pressure. The NS NHS response to the Bristol airport planning application (dated 14/08/09) stated that the airport's Health Impact Assessment was highly selective, limited in scope and could not be regarded as giving a sound basis for a planning decision. In addition the West of England Public Health Climate Change Group decided to take a proper look at all the issues (letter dated 29.07.09) and concluded that the information made available was not suitable to support a robust decision. This same group had presented to the consultation on the BIA Master Plan and concluded that health damage from airport expansion would definitely outweigh the possible benefits. Point 3.318 Brockley Combe is part of the cycling network and part of the green infrastructure of North Somerset. Further growth at Bristol Airport will make this route unattractive and unsafe due to increased journeys by car to and from the airport. This comment also relates to Vision 1.
Changes to be justified	A new Health Impact Assessment should be carried out taking into consideration latest research into airport noise and the impacts on residents living close by. The impacts of noise, increased traffic and air pollution should be considered.
Not effective	

Changes to be effective	The cumulative impacts of noise must be considered from a baseline of 2005 (the airport Master Plan date, i.e. 5.2m passengers) and not from a baseline of 10m passengers (the ceiling set by the recent planning application). Adequate compensation must be provided to households who move to a higher noise contour. The Council should have an ambition to work towards a ban on night flights and to noise regulations set by the World Health Organisation.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/17
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	

Changes to be justified	
Not effective	While supporting the contents of CS26 the policy fails to recognise the importance of clean air to health and well-being. Planning policy needs to consider the adverse affects of commercial pollution, domestic bonfires, the burning of waste to avoid tipping costs, and the now common practice of burning horse manure.
Changes to be effective	Additional content needed: 'The policy recognises the importance of clean air to the health and well being of North Somerset residents and this will be reflected in the decision making process.'
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/12
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	South West RP Planning Consortium (72Kb) Bromsgrove District Council Policy (216Kb)

Section CS27

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/9
Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	

Not effective	As with Policy CS26, Gleeson supports the objective of this policy within the wider vision for the Core Strategy. As much of the landscape surrounding the towns is presently under private land ownership, and with the main part being utilised for arable and agriculture purposes, public access is restricted to public rights of way only. As such Gleeson supports the provision of this policy which as part of delivering residential development could deliver publicly accessible open space. Accordingly, through the delivery of urban extensions this policy allows for a net benefit in access to open space for existing residents within the settlements. We agree with the supporting text at paragraph 3.327 which demonstrates the importance in open space and community facility provision across North Somerset. Gleeson also agrees with the objectives of the Policy to provide proportionate and appropriate facilities on site, in addition we would also suggest that a degree of flexibility is applied to this policy as it may be that an existing community would benefit more greatly from a financial contribution towards an existing facility than the provision of a new facility. In addition, by the application of a flexible approach the delivery of high quality open space could also be provided to enhance existing landscape and movement features, or to improve or provide additional wider community benefits. Gleeson would like to advocate the flexibility in the application of this policy to ensure that best design practice is applied for schemes and also that site constraints and characteristics can be best applied to the site in order to deliver a scheme of appropriate size and form, whilst also providing a benefit to existing residents.
Changes to be effective	Gleeson would like to advocate the flexibility in the application of this policy to ensure that best design practice is applied for schemes and also that site constraints and characteristics can be best applied to the site in order to deliver a scheme of appropriate size and form, whilst also providing a benefit to existing residents.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent The Theatres Trust

Respondent Name	The Theatres Trust
Comment ID	932833/CSPV/1
Respondent Organisation	The Theatres Trust
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	The Theatres Trust response.doc (67Kb)

Section CS28**Respondent Ashton Park Limited**

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/16

Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached form.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Ashton Park Ltd response CS28.doc (66Kb)

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/9
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We object to policy CS28 which seeks to deliver in total, 5,850 new dwellings balanced with approximately 10,500 employment opportunities from 2010 to 2026. The reasons for our objection are the same as those made in respect of Policies CS13 Scale of New Housing and CS14 Distribution of Housing Development.

Changes to be justified	We propose that Policy CS28 Weston Super Mare is deleted and re-written to provide for the scale of housing development to at least meet the requirement based on the Central Oxford Forecast and the employment land is delivered in-line with market demand.
Not effective	We also object to paragraph 4.6 which relates to the provision of 1.5 jobs per home. The reasons for this objection are set out above in relation to Policy CS20 Supporting A Prosperous Economy. The policy is considered to be unrealistic and undeliverable and will significantly impact on the ability of the authority to deliver housing.
Changes to be effective	We propose that paragraph 4.6 is deleted. The policy requiring 1.5 jobs per home is deleted and employment land should be delivered through a market led approach.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/8
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Highways Agency (R Davies)

Respondent Name	Highways Agency (R Davies)
Comment ID	4603585/CSPV/3
Respondent Organisation	Highways Agency
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The agency notes the reduction in the proposed level of growth for Weston-super-Mare compared with the consultation draft version published previously. In theory this should produce less growth in traffic and, in turn, less pressure on the safety and efficiency of M5 J21. However, we have not seen any evidence to show what impacts the revised development and its associated

	<p>traffic would have on the junction and what possible mitigation might be required, other than the identified Weston package which may or may not receive funding. As stated above, we welcome the often repeated reference to employment led development within WsM to redress the imbalance between the available working population and employment opportunities within the town. We note the aim to deliver 1.5 use class jobs per home to support the employment led approach. What remains unclear at this stage is how an employment led strategy will be delivered. We do not readily see the evidence base to demonstrate how this approach will be delivered nor the evidence to show that 1.5 jobs per home is a reasonable expectation. There are no clear policies which will limit the release of housing in line with jobs. In this respect it is not clear that this employment led approach is deliverable and therefore could be unsound. We welcome the commitment that strategic development will not be permitted to the east of the M5 at Weston-super-Mare. Such development would in our view be unsustainable by not being well related to Weston and inconsistent with the stated approach of increasing self-containment. See attached document for the full representation.</p>
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Highways Agency response.pdf (589Kb)

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
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Comment ID	4208577/CSPV/12
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Policy CS28 states that no strategic development will be permitted to the east of the M5 motorway. Paragraph 4.5 goes on to state that development to the east of the M5 is inappropriate. However, this view is not supported or demonstrated through robust evidence it is a statement with no basis. Land to the east of the M5 could play an important role in providing flexible opportunities for all types of economic and transport related development in line with the positive and proactive approach endorsed in PPS4. Policy CS28 prioritises the development of previously developed land, including the phasing for new development at Weston Villages. However, this is contrary to the wording of Policy CS30 which refers to more detailed phasing at the Weston Villages which takes into account infrastructure delivery, employment-led strategy, and viability. In addition, it is not considered sound that a blanket approach of prioritising brownfield land in the phasing of the Weston Villages is implemented. Greenfield land may need to come forward first to allow for infrastructure delivery or comprehensively delivered with other areas of development. The wording in paragraph 4.9 is considered unsound as it has the potential to result in delivery issues for the new development area. In addition, if the Council want to deliver early housing in the process as set out in other area of the Core Strategy, the phasing of land at Weston Villages will need to reflect the best way of achieving this. By simply restricting the releasing of suitable greenfield land until all brownfield land is completed has the potential to hinder the delivery of much needed housing at the appropriate point in the life of the Core Strategy.</p>
Changes to be justified	<p>The sentence "If provision of strategic infrastructure, including housing is dependent on development on greenfield land then this will be taken into consideration as part of the phasing strategy" should be added to the policy to reflect the position as set out in Policy CS30.</p>
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr B Hayes

Respondent Name	Mr B Hayes
Comment ID	4613569/CSPV/9
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	Mr B Hayes response.docx (27Kb)

Respondent Mr J Vowles

Respondent Name	Mr J Vowles
Comment ID	4600993/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13
Changes to be justified	Increase number of dwellings to be provided in the Weston Villages to 9,000, as originally proposed, and provide for up to 5,000 new dwellings in the Weston Urban Area. Consider allocation of additional strategic site or sites in Weston Urban Area to accommodate extra dwellings required.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13
Changes to be effective	Increase number of dwellings to be provided in the Weston Villages to 9,000, as originally proposed, and provide for up to 5,000 new dwellings in the Weston Urban Area. Consider allocation of additional strategic site or sites in Weston Urban Area to accommodate extra dwellings required.
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Mrs D Alvis

Respondent Name	Mrs D Alvis
Comment ID	4601025/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	Increase number of dwellings to be provided in the Weston Villages to 9,000, as originally proposed, and provide for up to 5,000 new dwellings in the Weston Urban Area. Consider allocation of additional strategic site or sites in Weston Urban Area to accommodate extra dwellings required.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	Increase number of dwellings to be provided in the Weston Villages to 9,000, as originally proposed, and provide for up to 5,000 new dwellings in the Weston Urban Area. Consider allocation of additional strategic site or sites in Weston Urban Area to accommodate extra dwellings required.

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/21
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	It would be an unrealistic and untenable Policy position to ignore the social and demographic issues at the town in pursuit of a rigid and inflexible strategy. An overly theoretical approach will not be in the best interests of the town. Mixed-use development, including residential and employment, offers a practical way forward to stimulate the local economy, create the opportunity for

	<p>short and long term employment, provide a range and mix of house types and tenures and improve social and community infrastructure, whereas an overly restrictive Policy will only aggravate the existing problems. Discussions with the Council on how employment-led could be made to work in the context of a mixed-use approach to development in Weston in relation to our planning application for the North West Quadrant of Weston Airfield have demonstrated the success of a flexible approach. We note that the development will be focused in two key areas - Weston Villages and the town centre and gateway. We consider it is important that Policy is applied consistently across the two areas and we are concerned that there are differences emerging in the treatment of residential development between the two areas. In particular, subsequent Policies apply a very specific jobs per dwelling formula at Weston Villages, but not in the town centre and whilst residential development is viewed as enabling development to deliver mixed-use schemes in the town centre and gateway in the emerging Weston Town Centre Area Action Plan, it is not viewed as enabling development for delivery of employment in the urban extension area. In relation to the 9 bullet points in the Policy, we have seven specific points - see attached document for details.</p>
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS29

Respondent AGM Holdings Limited (M Michael)

Respondent Name	AGM Holdings Limited (M Michael)
Comment ID	1017825/CSPV/2
Respondent Organisation	AGM Holdings Plc
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS29 indicates sites within the Gateway area closest to the town centre and train station should be developed for commercial/office use. The Sunnyside Road site has the potential to come forward in a planned form, either on a comprehensive or piecemeal basis, having regard to an approved Masterplan and/or Development Brief. The future development of the site will largely be led and dictated by market forces, having regard to known Operator interest, but could include either singularly or a mixture of any such uses including retail/leisure/hotel/residential/institution ie headquarters and/or offices. Given the sites strategic landmark location, there is scope for a building of significant presence and height to be located on the site ie up to 15-20 storeys, subject to meeting those criteria (1-3) in Policy CS29 and which requires a building of high quality design and visual presence, whilst minimising trips by car etc.
Changes to be justified	Policy CS29 should be amended to reflect this key site to deliver the regeneration benefits sought for the area, but should be more flexibly worded to ensure it also responds to market forces, as opposed to restricting such development to commercial/office led proposals.
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent B&Q

Respondent Name	B&Q
Comment ID	4570305/CSPV/1
Respondent Organisation	RPS
Do you consider this part of the Core Strategy to be sound?	No

Not justified	CS29 defines a 'gateway area' and states that within this area 'retail uses will not be appropriate'. This is unnecessary and conflicts with the positive advice provided in PPS4 which encourages all forms of economic development including retail uses. The next sentence of policy CS29 makes reference to 'proposals should not harm the viability or vitality of Weston's town centre or seafront'. This part of the policy provides sufficient protection against any harmful retail development in the gateway area. Accordingly the prohibition on retail development in this area is contrary to government policy. Furthermore the policy allocation fails to recognise that the 'gateway area' includes a number of established retail businesses. The policy potentially prevents those businesses from growing given the general statement regarding the inappropriateness of retail uses in this location. The policy fails to recognise the needs of existing retail businesses located within the gateway area.
Changes to be justified	Delete the reference to 'retail uses will not be appropriate' in order to make the policy compliant with PPS4. There are sufficient safeguards built into the policy and in PPS4 to prevent harmful retail development in the gateway areas. As drafted the policy ignores the contribution that existing retail businesses make to the overall economic well being of the town and its retail offer.
Not effective	
Changes to be effective	
Not consistent with national policy	CS29 defines a 'gateway area' and states that within this area 'retail uses will not be appropriate'. This is unnecessary and conflicts with the positive advice provided in PPS4 which encourages all forms of economic development including retail uses. The next sentence of policy CS29 makes reference to 'proposals should not harm the viability or vitality of Weston's town centre or seafront'. This part of the policy provides sufficient protection against any harmful retail development in the gateway area. Accordingly the prohibition on retail development in this area is contrary to government policy. furthermore the policy allocation fails to recognise that the 'gateway area' includes a number of established retail businesses. The policy potentially prevents those businesses from growing given the general statement regarding the inappropriateness of retail uses in this location. The policy fails to recognise the needs of existing retail businesses located within the gateway area.
Changes to be consistent	Delete the reference to 'retail uses will not be appropriate' in order to make the policy compliant with PPS4. There are sufficient safeguards built into the policy and in PPS4 to prevent harmful retail development in the gateway areas. As drafted the policy ignores the contribution that existing retail businesses make to the overall economic well being of the town and its retail offer.
Attached documents	

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/10
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	We object to Policy CS29 in relation to the Gateway Area because the policy makes no reference to the role of residential development in achieving the most efficient use of the land and mixed use development in the area.
Changes to be effective	We propose that Policy CS29 Weston Super Mare Town Centre in relation to the Gateway area is deleted and re-written to identify the importance of residential development on delivering development in the Gateway Area.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/10

Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/21
Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	Area policy for Weston-super-Mare Town Centre does not address the issues of restaurant, art and culture which are raised as town centre issues in PPS6. This comment relates to Vision 2 and Priority Objective 5.
Changes to be consistent	To be consistent throughout the Core Strategy, PPS6 should be referred to for Weston-super-Mare as it is for Service Villages as at 4.86.
Attached documents	

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/7
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/22
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Policy is not justified. Persimmon Homes refers to comments on Policy CS30 that there should be a consistent approach to the delivery of housing throughout Weston-super-Mare in respect of the application of employment linkages and the enabling role of residential development for both regeneration and delivery of infrastructure to enable employment, or development.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents

Respondent South West Transport Network

Respondent Name	South West Transport Network
Comment ID	4616513/CSPV/9
Respondent Organisation	South West Transport Network
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Weston-super-Mare policy CS29 fails to identify good public transport interchange sites at Weston-super-Mare rail station Locking no coach station and protect the ferry services.
Changes to be justified	Regeneration policy need to include good public transport links and bus services plus protection of bus coach interchanges.
Not effective	Because CS29 fails to read across with CS10, CS11 and does not enhance public transport function.
Changes to be effective	The Tesco site Locking road coach station coach park and rail station should be include bus coach rail service facility improvement.
Not consistent with national policy	National Transport parking white paper PPS13 local transport plan West of England.
Changes to be consistent	Park and ride for Weston-super-Mare. A new policy word to include protecting and enhancing public transport facilities in Weston-super-Mare at Locking Road coach station Weston-super-Mare station/Tesco bus focus.
Attached documents	

Section CS30

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/15
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See attached form.
Changes to be justified	See attached form.
Not effective	See attached form.
Changes to be effective	See attached form.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Ashton Park Ltd response to CS30.doc (74Kb)

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/11

Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	<p>We object to Policy CS30 as per the reasons set out in relation to Policy CS20 which relates to the provision of 1.5 B class jobs per dwelling. Furthermore, the sites are considered not to be deliverable due to significant infrastructure cost requirements and the current cuts in public sector spending. This problem will be further exacerbated by the requirement in paragraph 4.59 that identifies that residential development will be delivered in tranches of 250 units, with each tranche being supported with the necessary employment provision. Maintaining commercial viability to ensure the deliverability of any development is critical. However imposing onerous obligations or restrictions on developments has a major impact on the cash flow and therefore the ability to secure the necessary funding and even consider commencing development. Furthermore, the timescale taken to provide this level of employment is such that it may not be possible or desirable to erect separate buildings for each tranche of 250 units or 375 jobs based on the jobs to homes ratio. In order to provide a commercial development of any meaningful size to be attractive to the market, it would likely be two years before the employment floorspace was completed and ready to be occupied, due to the time taken to agree building specifications, obtain reserved matters/planning approval and complete development on the site. Critically, this does not also consider how the significant up front costs of land purchase and services and access would then be recovered. Clearly this is a key issue at Weston Villages. Finally, we object to paragraph 4.73 because it does not make any reference to the need for any contributions towards strategic infrastructure being assessed in the context of ensuring developments remain viable</p>
Changes to be effective	We propose that the policy requiring 1.5 jobs per home is deleted. We propose that paragraph 4.73 is amended to make reference to ensuring development remains viable.

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent CLIFF DUMBELL

Respondent Name	CLIFF DUMBELL
Comment ID	3314689/CSPV/9
Respondent Organisation	RHUBARB
Do you consider this part of the Core Strategy to be sound?	No
Not justified	

Changes to be justified	
Not effective	Within the "Deliver integrated strategic transport infrastructure including" there is- A371 to Wolvershill Road/Churchland Way Link". During all consultations it has been pointed out by local residents that any such THROUGH link would be used as a rat run by drivers coming to/from the M5 to get to South Weston.... resulting in increased traffic and environmental damage to the villages of Hutton and Locking. This argument had to my knowledge been accepted by NSC and an assurance given that any such link INTO Parklands from Wolvershill would NOT be a through road to the A371.
Changes to be effective	Delete the A371.... Link sentence from the list of STRATEGIC TRANSPORT INFRASTRUCTURE. In addition to my explanation above, any such major through road would CUT THE PARKLANDS COMMUNITY IN HALF, completely negating the Core Strategy objective of creating a SINGLE SUSTAINABLE COMMUNITY!
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Environment Agency

Respondent Name	Environment Agency
Comment ID	1020673/CSPV/1
Respondent Organisation	Environment Agency

Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Name	Environment Agency
Comment ID	1020673/CSPV/2
Respondent Organisation	Environment Agency
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	

Not effective	<p>The key constraint to both solutions is their deliverability. North Somerset Council current Developer Contributions SPD is not realistic as an overall package. Whilst the Flood Risk Management contribution is low (£952) the overall charge to developers is high. This may put the deliverability of both Flood Risk Management infrastructure options into question. North Somerset Councils Infrastructure Delivery Plan dated February 2011 suggests using Community Infrastructure Levy or Tax Incremental Funding, however, limited detail has been provided regarding these options. At present, due to the unknowns/uncertainties on funding at a national government level and the remote chance of developers paying the high contribution charges, this could be a test of soundness issue. Para 4.45, p.17 of PPS12 is clear in stating that Core Strategies must demonstrate how infrastructure would be delivered. North Somerset Council need to take both solutions further forward in detailed design, to ensure that all the environmental issues are considered, exact costs determined and delivery timetables established. North Somerset Council state that they cannot avoid development in flood risk areas as this would be detrimental to Weston's economic viability. The Agency would advise that Sequential Test details should be included justifying this development allocation process. The Weston Airfield site is in Flood Zone 3 (Para 4.65) however, the Sustainability Appraisal only refers to a Sequential Approach and not a Sequential Test. The Sustainability Appraisal policy matrix (p.34) for flood risk appears to conflict with other policies. Priority objective 3.5 has a negative impact because of the Weston Airfield site. This again emphasises the need for North Somerset Council to justify development at Weston Airfield. It is realised that there is a mitigation strategy, however, the hierarchy is clear in respect of the approach to proposed development in flood risk areas.</p>
Changes to be effective	<p>An audit trail will be required for the Examination in Public showing how each site has been allocated.</p>
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/8
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	FOSBR (Friends of Suburban Bristol Railways) urges that the "rail and bus improvements" mentioned as a key requirement for the Weston villages should include consideration of a new station for the Weston bypass line. This would serve the proposed Winterstoke village, the employment area at the former Weston Airfield site, and the Helicopter Museum. Such a station is necessary if the policy is to be effective in "reducing the impacts of car-based commuting" (para. 4.37) and creating a development that is "less reliant on the car" (para. 4.42).
Changes to be effective	Add to the "rail and bus improvements" bullet point on p. 117 so that it reads: "rail and bus improvements, including a new station at Weston Airfield". At para. 60, p. 122, for "Contributions to rail and bus improvements", read "5. Contributions to rail and bus improvements, including a new station at Weston Airfield".

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Highways Agency (R Davies)

Respondent Name	Highways Agency (R Davies)
Comment ID	4603585/CSPV/4
Respondent Organisation	Highways Agency
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	

Not effective	The agency notes the reduction in the proposed level of growth for Weston-super-Mare compared with the consultation draft version published previously. In theory this should produce less growth in traffic and, in turn, less pressure on the safety and efficiency of M5 J21. However, we have not seen any evidence to show what impacts the revised development and its associated traffic would have on the junction and what possible mitigation might be required, other than the identified Weston package which may or may not receive funding. As stated above, we welcome the often repeated reference to employment led development within WsM to redress the imbalance between the available working population and employment opportunities within the town. We note the aim to deliver 1.5 use class jobs per home to support the employment led approach. What remains unclear at this stage is how an employment led strategy will be delivered. we do not readily see the evidence base to demonstrate how this approach will be delivered nor the evidence to show that 1.5 jobs per home is a reasonable expectation. There are no clear policies which will limit the release of housing in line with jobs. In this respect it is not clear that this employment led approach is deliverable and therefore could be unsound. We welcome the commitment that strategic development will not be permitted to the east of the M5 at Weston-super-Mare. Such development would in our view be unsustainable by not being well related to Weston and inconsistent with the stated approach of increasing self-containment. See attached document for the full representation.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Highways Agency response.pdf (589Kb)

Respondent MJR

Respondent Name	MJR
Comment ID	1572161/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	The identification of highway routes without public transport, cycling, or walking routes appears to contradict the CS10: Transportation and Movement policy to integrate planning of these facilities.
Changes to be effective	Identify public transport, cycling, and walking routes, in so far as they will link to the existing network and the local centres.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/13
Respondent Organisation	Origin3

Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Delivery of 5,500 dwellings: There is no clear or justifiable evidence base to arrive at a figure of 5,500 dwellings for the Weston Villages. In his Stage 2 report, Mr Woodhead does not demonstrate a robust link between the existing evidence base and his conclusions about reducing the overall need for housing. In discussions with officers, it has been suggested that the figures are based upon a percentage of development spread across the land shown on the inset map. Again this is not a robust method for assessing capacity; especially as has been stated previously by the Council that site boundaries are illustrative and not fixed.</p> <p>Provide at least 37.7ha of B Use-Class employment: There does not appear to be a clear evidence base linking the proposed amount of new employment land and the suggested need for new employment. There is no environmental capacity testing to suggest that 37.7ha is appropriate. Furthermore, there is no indication on whose land this is to be provided and how delivery will trigger the release of housing. This policy is not effective because it is not flexible enough. Such details should be addressed if anywhere, in a site allocations DPD or suitable SPD.</p> <p>Provision of a Local Centre: There appears to be a mismatch between the aspirations of North Somerset Council to delivery B Class jobs and employment on site and potential retail and other demands that are classed as "Town Centre Uses" and as such should be considered as part of the "Local Centres". This part of the policy is not the most appropriate having regard to alternatives.</p> <p>Standard Charge: Whist Mead Realisations supports the principle of a standard charge to facilitate the pooling of financial contributions, the indicative rate causes significant concerns about the cost of delivery and its impact upon future viability. From the information seen so far, the emerging Standard Charge is not based upon a robust and credible evidence base.</p>
Changes to be justified	<p>Reference to 1.5 B Class jobs should be removed from the Plan in the absence of a full explanation as to how this mechanism is to work. It should be reconsidered as part of any Weston Villages DPD or SPD. The Requirement to provide 37.7ha of employment land should also be removed. Reference to "around 5,500" new homes should be removed and replaced with "provide a minimum of 5,500 new homes or a suitable quantum supported by environmental capacity testing" Reference to 37.7ha of B Class employment land provision should be removed and replaced with "provision of a balanced range of landuses, including employment" Reference to the requirement to provide site wide renewable energy should be removed and replaced with a commitment to explore renewable alternatives, including potentially more sustainable micro generation. Care should be taken to</p>

	<p>explain that the "Local Centres" for Weston Villages are of a scale that is appropriate to delivering sustainable development and should not be restricted in size by earlier references in the plan (see policy CS21). References to Strategic Infrastructure should be caveat to ensure that only the appropriate requirements for each development are requested. Reconsideration should be given to the evidence base that supports the revised Helicopter corridor. ? Reference to the standard charge should ensure that viability and deliverability are two further considerations in arriving at a suitable figure.</p>
Not effective	<p>Prioritise the delivery of Locking and Weston Airfield land: Concern is expressed about the prioritising of development at Weston and Locking Airfields through the Core Strategy when little is yet known about future masterplans and how sites may be linked. Whilst some of the land controlled by Mead Realisations is greenfield, it needs to be delivered in a comprehensive manner alongside the redevelopment of Locking Airfield and other brownfield land. Mead Realisations land will deliver a number of key infrastructure requirements relating to access and surface water management (amongst others). Furthermore, with the rate of anticipated delivery (based on 5,500 dwellings or more) there will be a need to commence early development in a number of locations within each of the village to ensure that maximum benefit can be derived from having a range of building outlets. This part of the policy is simply too inflexible and has the potential to have a significant impact upon the Council's housing delivery trajectory. Strategic Infrastructure: It is not clear from Policy CS30 as to which pieces of infrastructure relate to which new village. The policy wording is not therefore effective in establishing a flexible approach. Clarity is also sought on the term "strategic flood solutions", as this is not clearly defined in the document. At present, this part of the policy cannot be effectively monitored.</p>
Changes to be effective	<p>? Reference to 1.5 B Class jobs should be removed from the Plan in the absence of a full explanation as to how this mechanism is to work. It should be reconsidered as part of any Weston Villages DPD or SPD. The Requirement to provide 37.7ha of employment land should also be removed. ? Reference to "around 5,500" new homes should be removed and replaced with "proved a minimum of 5,500 new homes or a suitable quantum supported by environmental capacity testing" ? Reference to 37.7ha of B Class employment land provision should be removed and replaced with "provision of a balanced range of landuses, including employment" ? Reference to the requirement to provide site wide renewable energy should be removed and replaced with a commitment to explore renewable alternatives, including potentially more sustainable micro generation. ? Care should be taken to explain that the "Local Centres" for Weston Villages are of a scale that is appropriate to delivering sustainable development and should not be restricted in size by earlier references in the plan (see policy CS21). ? References to Strategic Infrastructure should be caveat to ensure that only the appropriate requirements for each development are requested. ? Reconsideration should be given to the evidence base that supports the revised Helicopter corridor. ? Reference to the standard charge should ensure that viability and deliverability are two further considerations in arriving at a suitable figure.</p>

Not consistent with national policy	Employment-led approach: Whilst Mead Realisations does not object to a balanced growth strategy, the requirement to provide 1.5 B Class jobs per dwelling in addition to jobs from non B Class uses is not the most appropriate strategy and is not effective from a deliverability perspective. North Somerset Council has yet to explain how such a policy will be applied and the mechanisms for achieving the required level of housing growth in line with their housing trajectory particularly as it appears restricted by the need to deliver new jobs. In this instance the evidence base has not assessed the full impacts of such an approach especially upon delivery and viability. It is not therefore an effective part of policy CS30 and is not based upon a robust and credible evidence base. Furthermore, it remains unclear as to how this matter is to be addressed as part of development on the St Modwen land at Locking Parklands and the Persimmon Homes' land at Weston Airfield. The requirement to provide B Class jobs also remains out of alignment with national planning policy and appears to be based upon outdated guidance found in PPG4. Replacement Government policy (PPS4) is far more wide reaching than simply focusing upon B Class jobs; it recognises the diversity of the employment market and the importance of other sectors that in planning terms, fall outside of the strict definitions set out in the B Classes. This part of Policy CS30 is not therefore consistent with national planning policy.
Changes to be consistent	Reference to 1.5 B Class jobs should be removed from the Plan in the absence of a full explanation as to how this mechanism is to work. It should be reconsidered as part of any Weston Villages DPD or SPD. The Requirement to provide 37.7ha of employment land should also be removed. Reference to "around 5,500" new homes should be removed and replaced with "provide a minimum of 5,500 new homes or a suitable quantum supported by environmental capacity testing" Reference to 37.7ha of B Class employment land provision should be removed and replaced with "provision of a balanced range of landuses, including employment" Reference to the requirement to provide site wide renewable energy should be removed and replaced with a commitment to explore renewable alternatives, including potentially more sustainable micro generation. Care should be taken to explain that the "Local Centres" for Weston Villages are of a scale that is appropriate to delivering sustainable development and should not be restricted in size by earlier references in the plan (see policy CS21). References to Strategic Infrastructure should be caveat to ensure that only the appropriate requirements for each development are requested. Reconsideration should be given to the evidence base that supports the revised Helicopter corridor. Reference to the standard charge should ensure that viability and deliverability are two further considerations in arriving at a suitable figure.
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr and Mrs P Moss

Respondent Name	Mr and Mrs P Moss
Comment ID	3556961/CSPV/2
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	As presently drafted, the boundary of Parklands Village, as shown on Key Diagram Inset 2 follows field boundaries which may, or may not, turn out to be the most appropriate boundary of the proposed development. Any outwards adjustments of this boundary will, potentially, increase the amount of development permissible. The Policy should not artificially limit the amount of development which will be permitted within the area if there are sound reasons for extending the boundaries.
Changes to be justified	Amend text after second bullet point to provide 'at least' 5500 new homes.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents

Respondent Natural England

Respondent Name	Natural England
Comment ID	2862209/CSPV/7
Respondent Organisation	Natural England
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/23

Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>The Policy is not justified and effective and would benefit from the changes outlined below. 1. We recognise the intention of this provision is to give a practical measure for linking employment provision to residential provision. We have a number of comments about this approach. Firstly, there is nothing in the Evidence Base to justify this approach. There is no need for a rigid formulaic Policy to be in place. If a site, or a Developer, provides a number of jobs, does that release the appropriate number of residential units for that site/Developer? If an employment site comes forward where there is no residential proposed, or the Developer does not have a direct link to a residential site, how and where will residential units be released? Does the formula require the provision of actual jobs, or provision of floor space capable of providing jobs? The simplistic jobs per dwelling formula does not recognise the contribution different dwelling sizes have to number of jobs. The Policy should relate to the provision of all jobs, not just B Use Class jobs. The approach fails to recognise viability issues. The proposed housing and employment allocations do themselves not equate with the formula. 3. We consider this part of the Policy is too vague and does not give any guidance on how different B Class Uses will be distributed amongst the different employment areas. In this respect, we consider the Core Strategy should reflect the approach in the adopted Local Plan and in particular Policy E1/C. 4. There needs to be some flexibility in the application of this part of the Policy, given that technologies related to renewable energy are still evolving. 7. We note the list of transport infrastructure requirements, which range from specific proposals to general improvements and which cannot all be treated in the same way in assessing provision and viability. 9. We consider this is too prescriptive and that some flexibility needs to be built into the Policy</p>
Changes to be justified	<p>1. "and planning applications" should be added to the end of the first paragraph of the Policy. 2. We consider the Core Strategy should reflect the approach in the adopted Local Plan and in particular Policy E1/C in relation to part 3 of Policy 30 to give more guidance on how the different B Class USEs will be distributed amongst the different employment areas. 3. In relation to bullet point 12 the Council will need to reconsider the introduction of the development tariff, particularly in the light of CIL Guidance,</p>

	which will require existing tariff schemes to be replaced by CIL and new tariffs will be disallowed. 3. In bullet point 14 a cross reference to Policy CS19 would be helpful.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS31

Respondent Baker Family

Respondent Name	Baker Family
Comment ID	4601153/CSPV/2
Respondent Organisation	

Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth, Scenario B, target which we consider should be adopted by the Council (see our comments in respect of Policy CS13).
Changes to be justified	Increase housing provision in Nailsea by up to 1000 dwellings in the period to 2026. Consider allocation of strategic site or sites in Nailsea to accommodate extra dwellings required.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth, Scenario B, target which we consider should be adopted by the Council (see our comments in respect of Policy CS13).
Changes to be effective	Increase housing provision in Nailsea by up to 1000 dwellings in the period to 2026. Consider allocation of strategic site or sites in Nailsea to accommodate extra dwellings required
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/12
Respondent Organisation	Bloor Homes

Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>We object to Policy CS31 because it should include Yatton which holds the same characteristics as the other three towns identified. These characteristics include: · An existing concentration of business and employment uses, and realistic potential for employment opportunities to be enhanced; · Shopping, cultural, faith, education, health and public services that meet the needs of the settlement and the surrounding area; and · Sustainable transport modes that can be maintained or developed. Yatton holds these characteristics as it has existing business and employment opportunities within the town and our client's proposals with the proposed employment development would provide the opportunity to increase the scale of employment within the town. Additionally the town has a range of facilities for shopping, culture and education which meet the needs of the town and the wider area. Furthermore Yatton is well served by sustainable transport modes including buses but in particular the good quality rail service available from the town's station which provides frequent services to Bristol, Weston Super Mare and other destinations. Further information on Yatton and its suitability for housing and employment development is set out within our site specific representations in respect of our client's site at Land North of Arnolds Way within Section. Our clients site could help to deliver development as set out in Appendix 1 which sets out an overview of the site, how it complies with National Policy and supporting technical studies, including: 1. Transport Report 2. Flooding and Drainage 3. Phase 1 Habitat Assessment</p>
Changes to be justified	<p>In light of the above we propose that Yatton should be identified under Policy CS31 We therefore propose that Yatton should be identified to provide: · Up to 1,000 dwellings in the period 2010-2026 in order to meet the housing requirement; · Up to 10 ha of employment land for B1, B2 and B8 uses in the period 2010-2026.</p>
Not effective	
Changes to be effective	
Not consistent with	<p>We object to paragraph 4.78 which identifies that the town should only accommodate 'locally significant development'. They are considered large enough to provide for more than locally derived demand. This does not comply with the requirements of PPS4 which seeks to deliver employment opportunities</p>

national policy	
Changes to be consistent	We propose that paragraph 4.78 is deleted
Attached documents	Land to the north of Arnolds Way, Yatton reps.pdf (160Kb) Phase 1 Habitat Assessment Arnolds Way.pdf (932Kb) Appendix 1, 2, 3 and 4 Habitats Assessment Arnolds Way.pdf (104Kb) Flooding & Drainage Report Arnolds Way.pdf (8.6Mb) Transport Report Arnolds Way.pdf (4.8Mb) Bloor Homes Development Concept for Arnolds Way.pdf (3.9Mb)

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/26
Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	Policy for Clevedon, Nailsea and Portishead does not address the issues of restaurant, art and culture which are raised as town centre issues in PPS6. This comment also relates to Visions 3,4 and 5 and Priority Objective 6.
Changes to be consistent	To be consistent throughout the Core Strategy, PPS6 should be referred to for Clevedon, Nailsea and Portishead as it is for Service Villages as at 4.86.
Attached documents	

Respondent Crest Nicholson Plc

Respondent Name	Crest Nicholson Plc
Comment ID	4602465/CSPV/4
Respondent Organisation	Crest Strategic Projects Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Crest Nicholson supports the provision of Area Policies but the grouping of the three towns into a single policy provides little or no ability to focus on addressing each specific town within the one policy. In respect of Nailsea the proposed allocation of 151 dwellings over the plan period (2006-2026) is disputed and no justification has been given as to why such a reduced requirement is proposed especially when one takes into account the past completion rates within the town. In this respect, the total housing provision for the three towns is substantially inadequate and does not reflect the completions over the last four years of the plan period (2006-2010). Taking into account the last four years completions at the towns of 444 dpa, this would equate to a dwelling provision for the plan period (2006-2026) of 8,885 dwellings.

Changes to be justified	Ideally, each town should have its own area policy. The housing provision for the three towns should be amended in line with the past completion rates and therefore the three towns housing provision should be 8,885 dwellings over the plan period. Nailsea's proportion of the housing provision should reflect the completions as well as recognised its sustainable location, with good rail links to Bristol.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/9
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	No

Not justified	
Changes to be justified	
Not effective	FOSBR (Friends of Suburban Bristol Railways) suggests that, for the reasons set out in our representation on Vision 5 (p. 17), a rapid transit link to Portishead would not be effective in encouraging modal shift.
Changes to be effective	We suggest that the words "rapid transit" should be deleted from the sentence: "For Portishead the re-opening of a rail/rapid transit link to Bristol is a priority".
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Gleeson Strategic Land

Respondent Name	Gleeson Strategic Land
Comment ID	4602593/CSPV/10
Respondent Organisation	Gleeson Strategic Land
Do you consider this part of the Core Strategy to be sound?	No

Not justified	Gleeson supports the provision of area policies, however by grouping the three towns into a single policy there is little provision of focus for the scope of the policy in relation to each of the towns. Our comments for this policy relate to Nailsea, where there is little mention of specific proposals over and above those identified within Chapter 2. Accordingly, we suggest that a greater level of detail is provided within the policy in order to better inform future settlement specific policies and development proposals at those settlements. As part of this consultation Gleeson supports the delivery of a mix of sizes and tenure of homes with associated Infrastructure at Nailsea. With regard to size and mix we consider that the towns, and in particular Nailsea should accommodate a mix of housing ranging from smaller starter homes to larger family homes to provide choice and diversity to the market place, thus stimulating a more balanced social demographic within Nailsea. We also consider that by increasing the housing allocation within the Core Strategy for Nailsea this will also encouraging sustainable patterns of growth by providing associated facilities and infrastructure in locations within an accessible distance of the town centre and within walking distance to the adjacent railway station. We also consider that there is an opportunity of enhancing public transport connections and the services within the town centre, but again think that
Changes to be justified	A greater level of detail should be provided within the policy in order to better inform future settlement specific policies and development proposals at those settlements. There should be a policy for each town rather than grouped into one.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Gleeson Developments Ltd response.pdf (3.0Mb)

Respondent Nailsea Town Council

Respondent Name	Nailsea Town Council
Comment ID	706241/CSPV/2
Respondent Organisation	Nailsea Town Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>The policy then seeks to quantify the level of new houses and jobs for the towns. The figures for Clevedon and Portishead are very significantly greater than those for Nailsea, despite the settlements all having broadly similar populations. Clevedon and Portishead have also been the subject of significant growth, particularly in employment provision in the past 10 years, whilst Nailsea has not benefited at all from such new jobs and investment. There is no reference in the Core Strategy to any evidence upon which the figures are based and discussions with the planning authority officers indicate that the justification for both the housing and employment figures comes not from the needs of the community but from the availability of land within the settlements. It is understood that the housing figure arises from the residential land survey which indicates the extent of available land within each settlement, whilst the employment figures are generated from the Employment Land Availability Survey which indicates unimplemented permissions and allocations and some job creation derived from a ratio of new homes to be delivered on existing sites. In short no attempt has been made to understand the settlement and its needs for the future. Instead the District Council seems to simply adopt a future strategy based on existing availability of land. The Town Council would wish to work with the District to further understand the needs of the Nailsea Community and to plan for the long term future. It is believed that this future will require additional job growth in the town if it is to meet the aspirations set out in the initial paragraph of the policy.</p>

	However, it is considered that, at present, the policy is not sound as it is not based on a robust evidence base of what the community actually needs.
Changes to be justified	The District Council should consider the future needs of the communities in all three towns and revise the figures for housing and employment needs in line, not with the availability of land at present, but to reflect the future needs of those communities. The final paragraph of the policy refers specifically to Nailsea. The wording of the policy is supported as long as changes are made to Policy CS6, as identified in the Town Councils submission on that Policy. If policy CS6 is not amended then the Town Council would seek to amend the wording of the final paragraph to delete the words; "the site is not in the Green Belt" This change would at least allow for allocations for development to be made through the appropriate DPD which are within the Green Belt. It is accepted that this would not however, be a very satisfactory situation as the allocations DPD should be able to amend the Green Belt Boundary as well as the settlement boundary if that would provide for sustainable development opportunities.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	CS31 response from Nailsea Town Council (42Kb) Nailsea Town Council Baseline Review.pdf (1.3Mb) Nailsea Parish Plan.pdf (106Kb) Parish Plan Policy Statement.pdf (66Kb) Towards the Nailsea Parish Plan.pdf (908Kb)

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/25
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	<p>The Policy is not effective. The RSS provides an important Evidence Base, notwithstanding the current and future status of the actual document, which goes beyond the issue of housing numbers. That includes the Evidence Base relating to the Spatial Strategy of the document relating to the location of development which is set out in a 3 tier strategy - Strategically Significant Cities and Towns, development at market and coastal towns and development at small towns and villages. We note that the Core Strategy embraces the SSCT Strategy by concentrating development at the only SSCT in North Somerset at Weston-super-Mare and it also embraces the Policy for self-containment and stronger local communities in small towns and villages. However, it completely rejects the proposed provision for housing, employment, shopping and other facilities at market and coastal towns to increase their self-containment and meet the bulk of development requirement outside SSCT. Effectively provision is restricted to existing commitments which we consider will fail to meet the Vision for Clevedon, Nailsea and Portishead. In addition, the housing part of the Policy is more restrictive than that for the service villages, which allows new residential development to be</p>

	brought forward which is outside settlement boundaries, but which is supported by the local community. We consider the same provision should apply to Policy CS31 and Clevedon, Nailsea and Portishead.
Changes to be effective	We consider the same provision should apply to Policy CS31 and Clevedon, Nailsea and Portishead.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Volaw Corporate Trustees (Wyg Planning & Design)

Respondent Name	Volaw Corporate Trustees (Wyg Planning & Design)
Comment ID	3322817/CSPV/5
Respondent Organisation	Wyg Planning & Design
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	The Volaw Corporate Trustees and Volaw Trustees (112Kb)

Section CS32

Respondent Alfred Hill

Respondent Name	Alfred Hill
Comment ID	4603809/CSPV/4
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	It is our view that more attention needs to be paid to meeting local needs where they occur. This is not just at Weston-Super-Mare, Clevedon and Portishead, but needs to be spread around the district more. By local needs we do not just mean affordable housing. We consider that it is unfair that people with local ties but who do not qualify for affordable housing can find themselves with no

	<p>access to housing in their village. The issue of support for facilities is now coming into sharper focus as the population ages. This affects schools in particular with school roles likely to fall without some additional housing, while older people also need access to facilities as close to where they live as possible. We therefore support the proposals for Policy C settlements contained in the text and the accompanying map. In particular, we support the inclusion of Easton-in-Gordano/Pill as a Policy C village. It has a good range of facilities which marks it out as a local centre, including primary and secondary schools, a library, a doctor's surgery and a post office among other things. In the light of the comments above, we consider that it is essential that some limited housing development should be proposed at Policy C villages, including Easton-in- Gordano/Pill. This will allow some affordable housing to be provided while also providingsome market houses which will provide opportunities to local people, though in the case of market housing it cannot be guaranteed that they will be sold to local people. We set out below proposals for development at Pill which are consistent with the approach. This involves land which is currently in the Green Belt.</p>
Changes to be justified	<p>In summary, we support the designation of Easton-in-Gordano/Pill as a Policy C village. This should carry with it the expectation that small scale housing development, including a proportion of affordable housing should be provided there. We propose non-strategic releases from Green Belt at Overhill Farm, Pill for residential development and at Portbury for motorway related retail and leisure. We propose the release of a large area of land from the Green Belt south of Easton-in- Gordano, Pill and Ham Green, which should be designated as "white land" and considered to meet the future development needs of Bristol beyond 2026.</p>
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	<p>Mr A Hill response.pdf (1.9Mb)</p>

Respondent Alvis Brothers Ltd

Respondent Name	Alvis Brothers Ltd
Comment ID	1051585/CSPV/3
Respondent Organisation	Alvis Brothers Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>It is our view that more attention needs to be paid to meeting local needs where they occur. This is not just at Weston-Super-Mare, Clevedon and Portishead, but needs to be spread around the district more. By local needs we do not just mean affordable housing. We consider that it is unfair that people with local ties but who do not qualify for affordable housing can find themselves with no access to housing in their village. The issue of support for facilities is now coming into sharper focus as the population ages. This affects schools in particular with school roles likely to fall without some additional housing, while older people also need access to facilities as close to where they live as possible. We therefore support the proposals for Policy C settlements contained in the text and the accompanying map In particular, we support the inclusion of Easton-in-Gordano/Pill as a Service village. It has a good range of facilities which marks it out as a local centre, including primary and secondary schools, a library, a doctor's surgery and a post office among other things. This should include Ham Green. In the light of the comments above, we consider that it is essential that some limited housing development should be proposed at service villages, including Easton-in- Gordano/Pill. This will allow some affordable housing to be provided while also providing some market houses which will provide opportunities to local people, though in the case of market housing it cannot be guaranteed that they will be sold to local people. We set out below proposals for development at Ham Green, which are consistent with the approach. This involves land which is currently in the Green Belt.</p>

Changes to be justified	In summary, we support the designation of Easton-in-Gordano/Pill, including Ham Green, as a Service village. This should carry with it the expectation that small scale housing development, including a proportion of affordable housing should be provided there. 6.2 We propose a non-strategic release from Green Belt at St Catherines, Ham Green, for residential development. We propose the release of a large area of land from the Green Belt south of Easton-in- Gordano, Pill and Ham Green, which should be designated as "white land" and considered to meet the future development needs of Bristol beyond 2026.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Alvis Brothers Ltd response.pdf (1.7Mb)

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/13
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No

Not justified	We have shown in respect to Policy CS31 that Yatton holds the same characteristics as the other settlement identified under Policy CS31.
Changes to be justified	We therefore object to its identification as a service village. It should be identified under Policy CS31.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bristol Water plc - Turley Associates

Respondent Name	Bristol Water plc - Turley Associates
Comment ID	4002849/CSPV/4
Respondent Organisation	Turley Associates
Do you consider this part of the Core Strategy to be sound?	No
Not justified	

Changes to be justified	
Not effective	Policy CS32 states that new development will not be permitted outside settlement boundaries, but that where small scale development demonstrates local benefits, is supported by the local community, and cannot be accommodated within settlement boundaries, this '...must be brought forward as an allocation in the Site Allocations DPD..' Whilst we are pleased to see that development outside settlements may be acceptable under Policy CS32, it is our view that the proposed requirement to identify sites within the Site Allocations DPD is an unacceptably restrictive approach (i.e. the proposed approach suggests that new development and the allocation of sites will occur in tandem, which is unlikely to be the case). Further to the above, we note that although Policy CS32 indicates the potential for development outside settlements (development within the 'countryside'), Policy CS33 makes no such provision. The proposed policy approach to development outside settlements is therefore contradictory.
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Bristol Water response by Turley Associates.pdf (260Kb)

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
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Comment ID	705793/CSPV/29
Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The provision for amendments to settlement boundaries contradicts the statement that 'new development will not be permitted outside settlement boundaries'. Allowing sites to be brought forward without a presumption against development will make villages a target for developers. This comment also relates to Vision 6 and Priority Objective 7.
Changes to be justified	It is not clear how 'clear local benefits' would be demonstrated and who would decide whether those 'benefits' outweighed the loss of undeveloped land. Clear agreed systems need to be in place to ensure this is not used to ignore potential for development within the current boundaries.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Childrens Hospice South West c/o David James & Partners

Respondent Name	Childrens Hospice South West c/o David James & Partners
Comment ID	4600961/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be indentified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be indentified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District.
Not consistent with national policy	
Changes to be consistent	

Attached documents

Respondent Congresbury Parish Council

Respondent Name	Congresbury Parish Council
Comment ID	1078849/CSPV/1
Respondent Organisation	Congresbury Parish Council
Do you consider this part of the Core Strategy to be sound?	
Not justified	
Changes to be justified	Congresbury parish Council welcomes being identified as a Service Village. It has concerns though about the suggested level of permitted residential development units (up to 10 per site) which it feels will lead to developments that are not appropriate to local needs and other housing needs being met outside the main development areas. The Parish Council would also wish to flag up the development potential of the Elliott Medway site and request that this be noted as an exception to Service Village limitations.
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Elizabeth Griffiths

Respondent Name	Elizabeth Griffiths
Comment ID	3359585/CSPV/1
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Following my 2010 correspondence with you, regarding our land adjacent to the boundary line in Moor Lane, Backwell, I housing in this area. Houses could go right up to the drainage ditch, provided for the 86 Bryant homes built on the village side of Moor Lane, and form a new defined boundary. This development would not be visible to the major part of the Village of Backwell and should be used for housing as the majority of it, including the field and the land owned by the council, have had no profitable use for at least twenty years. I did hear that the council have denied owning part of this land. Having lived here for nearly fifty years I

	<p>know historically that it was the old sewage works for Backwell and later a coach proprietor rented part of it from the council. I find this statement conflicting,'The subject matter of the SPD is housing in villages with settlement boundaries. The SPD provides guidance on meeting the requirements of Policy H/7 v) of the North Somerset Replacement Local Plan, which seeks to ensure that residential development in villages with settlement boundaries does not add to or contribute to creating a dormitory settlement with high levels of out-commuting.' Isn't the development of the villages on Weston Airfield outside WSM contributing to commuting? It also looks very costly to improve infrastructure. Your local plan strategy 3.18 states the role of the main railway line as a gateway and corridor to North Somerset and the South West and yet you only concentrate on WSM when Nailsea and Backwell has a fast growing use of the railway and bus service, this can be substantiated by the number of cars using the area for parking. With more local housing, on the land in Moor Lane, the station is in walking distance. This will not 'contribute to creating a dormitory settlement with high levels of out-commuting.' 4.8 (Backwell included) quote 'to encompass recently developed land.' The Bryant estate is recently developed (see attached doc)</p>
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	<p>Elizabeth Griffiths full comments (30Kb)</p>

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/11
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	FOSBR (Friends of Suburban Bristol Railways) suggests that, to make this policy effective, the station at Long Ashton should be reopened. This would enable Long Ashton to fulfil its role as a service village together with a reduction in commuting by car to Bristol and Weston.
Changes to be effective	We suggest that the following should be added to the penultimate sentence on p. 130, after "cycling and walking": "Consideration will be given to reopening the station at Long Ashton".
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/14
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	<p>We welcome, and support, the Council's recognition that housing growth in rural areas is required and the need to make specific provision for housing in service villages. However, existing settlement boundaries as set out in the Replacement Local Plan should be reviewed to reflect the present built form and to allow for future growth. In its current form Policy CS32 is too inflexible, and could preclude appropriate development, including development that could assist with securing and enhancing existing and new social and community facilities and services. Whilst we would expect such boundaries to be defined through the Site Allocations DPD as opposed to the Core Strategy as noted in paragraph 4.89 of Policy CS32, policy provision should be made within the Core Strategy for development boundaries to be adjusted to allow for small scale developments which are not the subject of specific site allocations to sustain village settlements. It is acknowledged that the smaller settlements have a role in accommodating a quantum of development, albeit that it will be low in comparison with the main towns. The scale of development that is typically appropriate in small village settlements is often below the threshold sufficient to justify a specific site allocation, and is opportunistic, usually coming forward as 'windfall' development. Nevertheless, it makes an important contribution to sustaining rural settlements. Policy CS32 is insufficiently flexible and does not give due weight to the importance of allowing for small scale development on the edge of settlements beyond the current limits within which most opportunities have now been exhausted. Site</p>

	allocations are not yet known and therefore Policy CS32 should take account of this. We do not consider that it would be sound for the Core Strategy to discount the contribution that can be made by suitable sites on the edge of existing villages.
Changes to be effective	Add an additional bullet point to read: to accommodate small scale development within and adjoining the existing settlement limits in keeping with the scale and character of the settlement.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr J Alderson

Respondent Name	Mr J Alderson
Comment ID	4601057/CSPV/3
Respondent Organisation	
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	Some of the Service Villages provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be identified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District. We consider that Churchill has scope for development beyond that envisaged in the Core Strategy and that the opportunity exists to amend the settlement boundary for the village as part of the Site Allocations DPD.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	Some of the Service Villages provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be identified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District. We consider that Churchill has scope for development beyond that envisaged in the Core Strategy and that the opportunity exists to amend the settlement boundary for the village as part of the Site Allocations DPD.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mr J Vowles

Respondent Name	Mr J Vowles
Comment ID	4600993/CSPV/5
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be indentified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be indentified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District.

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Persimmon Homes Severn Valley

Respondent Name	Persimmon Homes Severn Valley
Comment ID	3361153/CSPV/9
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Policy CS32 is considered unsound given that it is not based on sufficient justification. The policy should be amended so that it is more flexible and allows service villages to accommodate a scale of development appropriate to their particular size and role. A one size fits all policy, which limits residential development in all service villages to no more than 10 units is inappropriate. The supporting text recognises that when assessing individual sites a lower figure may be appropriate. There is, however, no recognition that a number of service villages benefit from services, facilities and public transport links that could support, and

	benefit from, developments exceeding 10 units. Developments of this scale can not only help to support existing services/facilities, but also bring much needed facilities/services to service villages and help to meet local housing needs. Backwell is an example of a service village that has a level of existing facilities and transport links that could support, and benefit from, well planned developments in excess of 10 units. The restrictive nature of Policy CS32, however, does not provide an appropriate mechanism to bring forward development capable of sustaining existing key local services and facilities, as well as deliver much needed affordable housing. Given that the settlement boundaries have not been subject to review, there are likely to be instances where new development could be acceptable outside of the existing settlement boundary. This has to be strongly reflected in any policy relating to service villages. The Core Strategy must therefore strengthen the flexibility for such sites to be brought forward and the settlement boundary to be revised. See attached document for full representation.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Persimmon Homes Severn Valley response.doc (94Kb)

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/26
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	This Policy is not effective. Persimmon support the settlements identified in the Policy and the principle of the Policy to permit proposals for small scale development within settlement boundaries, which respect the character of the villages and supports, or enhances, their role. Given these priorities, we do not support the limit on residential development to 10 units. If proposals pass the character and role tests, there is no justification in also restricting numbers. Paragraph 4.87 says the test may result in numbers being lower, but equally they could be higher.
Changes to be effective	
Not consistent with national policy	

Changes to be consistent	
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/18
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Sanders Executive Pension Fund

Respondent Name	Sanders Executive Pension Fund
Comment ID	4614081/CSPV/2
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The service villages are identified within the Policy. Service Villages have been identified on the basis of facilities existing within, including a village shop, postoffice, primary school, surgery, pub etc. Notably it is not only the size and level of facilities that has to be taken into account, but as recognised by para 4.86 their relationship to their hinterlands. The village of Bleadon has not been recognised or identified as a service village despite the good basis level of local facilities, but also its immediate and close presence to Weston-super-Mare/Uphill, which is less than one mile away to the north. Bleadon is an established community of circa. 1100 persons, with local facilities that rely upon 'day to day' use and support from the local community. It also benefits from direct and close public transport links to Weston-super-Mare and nearby places of work, notably the Weston General Hospital at Uphill.
Changes to be justified	There are sound and convincing reasons as to why Bleadon should be identified as a Service Village, particularly insofar as there is scope and proposals for a community led residential scheme on the land at Bridge Road/Bleadon Road, and which has the potential to accommodate up to 100 'market' and 'affordable' dwellings, including possible specialist housing provision for elderly persons etc and community facilities.
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Summerfield Developments (SW) Ltd (WYG Planning & Design)

Respondent Name	Summerfield Developments (SW) Ltd (WYG Planning & Design)
Comment ID	3846625/CSPV/1
Respondent Organisation	WYG Planning & Design
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Taylor Wimpey UK Ltd

Respondent Name	Taylor Wimpey UK Ltd
Comment ID	4599521/CSPV/3
Respondent Organisation	Taylor Wimpey UK Ltd
Do you consider this part of the Core Strategy to be sound?	No
Not justified	See Attached
Changes to be justified	Yatton stands out from these nine settlements in terms of its size, the range of services and facilities on offer including a rail connection with Bristol and Weston, and the scale of local employment. New development on a scale which would not be achievable within the existing settlement limits is justified in order to sustain and enhance this level of facility, ensure that the local growth in households can be accommodated locally and that an increasingly aging population is balanced with opportunities for new family housing in order to sustain local schools and the proportion of the population of working age commensurate with the employment opportunities on offer locally. To this end, the Site Allocations DPD will identify sufficient and suitable land for development in the early part of the plan period at North End. Otherwise, new development will not be permitted outside settlement boundaries. Where small scale residential or mixed use schemes which demonstrate clear local benefits are supported by the local community cannot be accommodated within existing settlement boundaries then these must be brought forward as an allocation in the Sites Allocation DPD, including an amendment to the settlement boundary where appropriate.
Not effective	

Changes to be effective	
Not consistent with national policy	See Attached
Changes to be consistent	Yatton stands out from these nine settlements in terms of its size, the range of services and facilities on offer including a rail connection with Bristol and Weston, and the scale of local employment. New development on a scale which would not be achievable within the existing settlement limits is justified in order to sustain and enhance this level of facility, ensure that the local growth in households can be accommodated locally and that an increasingly aging population is balanced with opportunities for new family housing in order to sustain local schools and the proportion of the population of working age commensurate with the employment opportunities on offer locally. To this end, the Site Allocations DPD will identify sufficient and suitable land for development in the early part of the plan period at North End. Otherwise, new development will not be permitted outside settlement boundaries. Where small scale residential or mixed use schemes which demonstrate clear local benefits are supported by the local community cannot be accommodated within existing settlement boundaries then these must be brought forward as an allocation in the Sites Allocation DPD, including an amendment to the settlement boundary where appropriate.
Attached documents	Response to CS32 (34Kb)

Respondent Tuckerwood Developments/M T Smith

Respondent Name	Tuckerwood Developments/M T Smith
Comment ID	4601121/CSPV/3

Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be identified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District.
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	Some of the Service Villages such as Congresbury, Yatton and Winscombe provide a higher level of services, amenities, employment opportunities and access to public transport than other, less sustainable villages, and should be identified in the Core Strategy as having scope to provide additional development where this is required as a consequence of changes advocated by us to the scale of new housing (Policy CS13) within the District.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Wrington Parish Council

Respondent Name	Wrington Parish Council
Comment ID	1019201/CSPV/1
Respondent Organisation	Wrington Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>It is acknowledged that flexibility has been introduced into the Policy wording but it is argued that without associated policies or specific measures to ensure retention of these facilities and services then any Service Village could see housing development alongside the loss of facilities. In Wrington for example, the Wrington Vale Medical Practice has announced its intention to close the GP surgery and relocate to a new site and building in Churchill. While it has been suggested that a subsidiary clinic will be opened within the village to provide some services, no further information is available and there is no guarantee of a long-term facility being provided. There is a directly associated issue with the pharmacy, which might not survive closure of the main surgery as this brings patients, carers and others into Wrington. At the same time the village grocery store is currently for sale and might not be viable for any potential new owner. Also, the bank now opens for just for two half-days each week, with its future possibly in doubt, and the optician opens only on two days. Any casual visitor to Wrington would not appreciate this. Hence, while we are not arguing that Wrington should be excluded from the list of Service Villages at this point, it could be that the future sees a marked reduction in the services available within the village alongside pressures for further housing development as result of Core Strategy policy. Whatever the policy guidance on development it needs to be related in some way to the level of service provision, if not then development will not be 'sustainable'. There is a potential conflict both within the policy statement and between the approach stated in para 4.90. The former states that employment development must be located within settlement boundaries yet</p>

	suggests circumstances under which mixed use schemes outside the boundary could be considered. Para 4.90 also suggests that employment development might be permitted outside.
Changes to be justified	Some indication is required on what might be considered to 'demonstrate clear local benefits', what would show clear proof that a development is 'support by the local community' and what is 'demonstrable need'. The Council recommends that Policy CS32 should be strengthened to reinforce containment related to the existing settlement boundaries. In addition, clear explanations need to be provided for the circumstances under which any variation might be considered. Finally, the criteria which classify any village as a 'Service Village' must be more clearly defined, with agreed policies put in place to provide the support necessary to ensure that, wherever possible, the relevant facilities and services are maintained into the long-term future.
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	Wrington Parish Council (33Kb)

Section CS33

Respondent Bristol Water plc - Turley Associates

Respondent Name	Bristol Water plc - Turley Associates
Comment ID	4002849/CSPV/5
Respondent Organisation	Turley Associates
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	<p>We note the statement within Policy CS33 that: 'New employment development will not be permitted in the Greenbelt.' This statement is entirely inflexible, and thus fails to accord with national policy PPG2, which allows for development in the Greenbelt in certain circumstances, and fails to accord with national policy PPS4, which requires that LPA's take a positive and constructive approach to sustainable economic development. The development of Brownfield sites (of all types) outside settlements that are, or will be accessible by a choice of means of transport, and that can be demonstrated to be sustainable in other ways, should not be precluded by the Core Strategy. The redevelopment and expansion of existing sites for redevelopment (for example) could provide beneficial development to support the 'vision' for North Somerset. An example of beneficial development could include, in principle, the redevelopment of land owned by Bristol Water to meet alternative operational needs, or to ensure that existing sites do not remain vacant, and/or to ensure a more positive re-use of land (alternative land uses). In summary, there are occasions where particular objectives can only be met through development outside settlements, and the Core Strategy should not directly preclude such development; as to do so would be to fail to provide appropriate flexibility to enable the delivery of beneficial development through the Plan period. As set out above, we recommend that the LPA makes changes to the text associated with policies CS6, CS32 and CS33 in order to correct this position.</p>

Changes to be effective	In summary, there are occasions where particular objectives can only be met through development outside settlements, and the Core Strategy should not directly preclude such development; as to do so would be to fail to provide appropriate flexibility to enable the delivery of beneficial development through the Plan period. As set out above, we recommend that the LPA makes changes to the text associated with policies CS6, CS32 and CS33 in order to correct this position.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Bristol Water response by Turley Associates.pdf (260Kb)

Respondent Burrington Parish Council

Respondent Name	Burrington Parish Council
Comment ID	3265601/CSPV/1
Respondent Organisation	Burrington Parish Council
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	Burrington Parish Council has considered, in particular, the Area Policies for 'Service Villages' (CS32) and for 'Infill Villages, Smaller Settlements and Countryside' (CS33). The Parish contains all or parts of the villages of Burrington, Rickford, Upper Langford and Lower Langford. We support the distinction between 'Service Villages' like the neighbouring villages of Churchill or Wrington and 'Smaller Settlements', like those in this Parish, which should provide an effective approach to the planning of community facilities and services, employment, housing and transport. The approach is also consistent with national and regional guidance. However, we have some reservations about the effectiveness of the approach to planning in the rural areas: 1. It is not clear that the approach to the planning settlements, local services and transport will achieve the Vision statements in Vision 6 and Vision 7, i.e. with 'Service Villages' becoming 'more self-contained' and 'serving the local and surrounding community for all their day-to-day needs'; with accessibility for infill villages 'improved to facilities and services not locally available within nearby larger settlements'. In particular, it is not at all clear how the continued loss of local services will be stemmed or reversed by the policies of the Core Strategy and there is little support for large parts of the rural area in the transport proposals of Policy CS10. 2. In Policy CS 33, further thought needs to be given to the definition of 'dwellings for essential rural workers'. Rural areas contain a wide range of businesses, economic and social activities with employees in need of housing. The approach should be related to the requirements of PPS 7 Annex A or clearly defined in some other way.
Changes to be justified	Either the Vision or the Policies should be revised, to be more realistic and to avoid offering a false prospectus that cannot be achieved in practice
Not effective	As above
Changes to be effective	As above
Not consistent with national policy	Consistency with PPS 7 Annex A should be explained.

Changes to be consistent	Consistency with PPS 7 Annex A should be explained.
Attached documents	

Respondent Friends of Suburban Bristol Railways

Respondent Name	Friends of Suburban Bristol Railways
Comment ID	3329249/CSPV/10
Respondent Organisation	Friends of Suburban Bristol Railways (FOSBR)
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	FOSBR (Friends of Suburban Bristol Railways) suggests that, to make this policy effective, reopening of the stations at Flax Bourton and Uphill should be considered, since those villages are included in the list of settlements where infill development will be permitted. These stations would be served by the existing local train service between Bristol and Taunton, and would serve both Uphill and Flax Bourton themselves and neighbouring communities.

Changes to be effective	We suggest the addition of the following sentence to paragraph 4 of CS33 (p. 133, after "Uphill and Winford"): "Reopening of the stations at Flax Bourton and Uphill will be considered, to serve those villages and their proposed infill development, as well as neighbouring communities."
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Kenn Parish Council

Respondent Name	Kenn Parish Council
Comment ID	2557121/CSPV/1
Respondent Organisation	Kenn Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents**Respondent Kingston Seymour Parish Council**

Respondent Name	Kingston Seymour Parish Council
Comment ID	1017889/CSPV/1
Respondent Organisation	Kingston Seymour Parish Council
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Kingston Seymour (population around 400) was originally proposed by North Somerset Council as an infill village, but as there are no remaining infill plots within the current settlement boundary the Parish Council suggested that it be re-designated as a "smaller settlement" . It is not in the Green Belt. However this has had the unintended consequence that it appears that it would not be possible, under this policy, to have any affordable houses. It seems unreasonable and unjustifiable to deny to small villages without settlement boundaries the possibility of acquiring a very limited number of affordable houses (say 2 - 4) under the rural exception scheme. Further, no evidence is presented to justify a departure from national policy as set out in PPS 3. Kingston Seymour is a flourishing community with over 50 small businesses and a growing number of young families. However it is currently almost impossible for young people growing up in the village to buy / rent their own home here due to a lack of suitable and affordable properties. Although the Council has no immediate for affordable housing it would not wish to be prevented from including such a proposal in a future Neighbourhood Development Plan.

Changes to be justified	The fifth paragraph of the policy should be amended by the deletion of the phrase "and then only adjacent to settlement boundaries". This would then permit both infill villages and smaller settlements to have small numbers of affordable houses. This change would be consistent with the principle of natural justice and is also required in order to ensure that the policy complies with national policy (see below) Policy CS17 should be amended also.
Not effective	
Changes to be effective	
Not consistent with national policy	One of the objectives of Planning Policy Statement 3: Housing is "A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural" (para 9). This is not qualified to limit its application to certain types of villages. Para 30 re-states and amplifies this, and refers to the Rural Exception Site Policy. This is deliberately intended to apply "in small rural communities that would not normally be used for housing, because, for example, they are subject to policies of restraint". No evidence is presented here to justify a departure from national policy.
Changes to be consistent	The fifth paragraph of the policy should be amended by the deletion of the phrase "and then only adjacent to settlement boundaries". This would then permit both infill villages and smaller settlements to have small numbers of affordable houses. This change is required in order to ensure that the policy complies with national policy (see below) Para 4.96 will require consequent amendment, Policy CS17 and Para 3.226 should be amended also.
Attached documents	

Respondent MJR

Respondent Name	MJR
Comment ID	1572161/CSPV/3
Respondent Organisation	

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	More definition is required on "carefully controlled".
Changes to be effective	A defined test or set of tests should be stated. It should not be easier to build homes for horses than homes for humans, even in infill villages.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Martyn Leisure

Respondent Name	Martyn Leisure
Comment ID	3583521/CSPV/6
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	No

Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	Our client, Martyn Leisure, considers that Policy CS33 presents little in the way of positive guidance in respect of rural economic development (particularly rural tourism). The policy does not, therefore, reflect the thrust of PPS 4. The policy should encourage tourist development and recognise that such provision might not be located within settlement boundaries and therefore due consideration should be given to enhancing existing facilities outside of settlement boundaries. As it stands, therefore, the policy offers little in the way of development control guidance on the aforementioned matter.
Changes to be consistent	Martyn Leisure requests that the first paragraph of Policy CS33 be amended as follows: "Proposals for economic development within rural areas outside of the Service Villages will be encouraged but strictly controlled (Delete: in order to protect their character and prevent unsustainable development). Careful consideration will be given to the form of the development and its justification to protect their character and prevent unsustainable development."
Attached documents	

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/15
Respondent Organisation	Origin3

Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	It is considered that Policy CS33 is not effective and too inflexible in its approach to the scope of development that can come forward in Infill Villages. Small scale development is essential to maintaining the vitality, and therefore the spatial pattern, of settlement in North Somerset, which contributes importantly to its character. The current approach completely ignores the viability and sustainability prospects of all settlements below Service villages in the settlement hierarchy. There does not appear to have been an objective assessment of the levels of development that maybe possible through infill development only or whether this will be adequate to address local need at these settlements. The policy is inflexible and does not allow for changing circumstances to be responded to during the plans life and grant the community proper opportunity to affect the type and level of development at their settlements. It is acknowledged that the smaller settlements have a role in accommodating a quantum of development, albeit that it will be low in comparison with the main towns. The scale of development that is typically appropriate in small village settlements is often below the threshold sufficient to justify a specific site allocation, and opportunistic coming forward as 'windfall' development. Nevertheless, it makes an important contribution to accommodating overall housing requirements, and to sustaining rural settlements. We do not consider that it would be sound for the Core Strategy to discount the contribution that can be made by suitable sustainable sites on the edge of existing settlement boundaries which can meet locally derived need.
Changes to be effective	To allow accommodating of development within and adjoining the existing settlement limits which meets locally derived need.
Not consistent with	

national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr D Breeze

Respondent Name	Mr D Breeze
Comment ID	3320065/CSPV/7
Respondent Organisation	CMH Management Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	We believe that this section of the Core Strategy is unsound as the policies restricting development in the Infill villages are too tightly constrained and do not respond to meet local needs, being derived from fundamentally flawed employment growth and overall housing projections. As we have stated in other policy objections we believe the underlying assumptions from which are derived the entire strategy are flawed based on low household and employment growth over the period.

Changes to be justified	We believe that Cleeve should be redefined as a Service Village. Our reasons for this are; Â· Following a Housing Needs Survey of Cleeve undertaken by the Parish Council and the Rural Housing Enabler, The Rural Housing Trust identified 29 households could not satisfy their housing needs in the open market and concluded that "a local needs housing scheme of say 10-12 properties with a mix of 2 and 3 bedroom dwellings would go some way towards meeting this need" Given that this survey is historic we believe that this situation will have only deteriorated and the shortage of affordable dwellings in the village is severely impacting upon local people who are unable to compete in the general open market, leading to greater social inequality. Â· We believe that Cleeve is a sustainable village with a good level of local facilities. However due to the absence of local employment opportunities and decent affordable housing the village suffers from a dormitory character. Limited local growth in the form of a local mixed-use development will create much needed employment opportunities for local people and will assist in meeting local housing needs. Â· We believe that 'Small scale residential or mixed use allocations adjacent to settlement boundaries provided they are community led and demonstrate clear local benefits' should be permitted to meet the needs of the local community. We believe that such development can be accommodated within the village without having any adverse impact on the overall character and openness of the village.
Not effective	We consider the Core Strategy to be unsound as it is underpinned by a complete over reliance on the deliverability of major development at Weston in assuming that 6,000 dwellings will be developed there. This almost complete reliance on one settlement fails to address the local needs of any other settlements and unreasonably restricts local peoples choice of housing and movement to the detriment of key workers and local smaller settlements. By distributing all the housing numbers in Weston, housing delivery is being risked on a single strategy which due to a very weak local housing market will fail to deliver the numbers anticipated, leading to greater affordable housing shortages, and increased house price inflation.
Changes to be effective	We consider that the Council should disperse a greater proportion of the overall housing requirement to the smaller settlements, including the infill settlements, in order to meet local housing needs which are more acute in the rural villages. We accept the primacy of the major settlements but to underpin the entire housing market on one settlement is in our opinion a high risk strategy and one that is fundamentally flawed.
Not consistent with national policy	The Core Strategy fails to conform with national policy set out in PPS3 and RPG10 and the emerging Regional Spatial Strategy (RSS). We believe that the Core Strategy dismisses the past 5 years work which has been undertaken on the emerging Regional Spatial Strategy (RSS). On November 10th 2010 Mr Justice Sales ruled in the High Court that the Government had acted unlawfully in not putting any transitional arrangements for planning in place, effectively reinstating the RSS as a material consideration. We believe that should the Council take forward the Core Strategy based on the significantly lower housing

	requirements it proposes it will clearly not be in conformity with the RSS, a document which we have no idea of knowing how long will be in existence.
Changes to be consistent	Housing numbers should not be set based on the "localism " approach, which underpins this methodology of a local employment based growth strategy but must follow the guidelines set out in national guidance. We believe that the Core Strategy should as part of this process review the Green Belt boundaries particularly in relation to the infill villages which are washed over with green belt, as we consider this limits growth to the detriment of meeting local housing needs.
Attached documents	

Respondent Mr N Nation

Respondent Name	Mr N Nation
Comment ID	4601281/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	It is considered that some of the Infill Villages, particularly those close to the Weston Urban Area, provide a range of services and amenities, and have access to employment opportunities in the urban area, making them suitable for development beyond that

	currently proposed in the Core Strategy. Settlements such as Kewstoke and Locking, for instance, are capable of small scale additional development within and immediately adjoining existing settlement boundaries (through site allocations).
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	It is considered that some of the Infill Villages, particularly those close to the Weston Urban Area, provide a range of services and amenities, and have access to employment opportunities in the urban area, making them suitable for development beyond that currently proposed in the Core Strategy. Settlements such as Kewstoke and Locking, for instance, are capable of small scale additional development within and immediately adjoining existing settlement boundaries (through site allocations).
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mrs J Parkins

Respondent Name	Mrs J Parkins
Comment ID	4601089/CSPV/1
Respondent Organisation	
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	Paragraph 4.94. There are sites within existing rural settlements (eg Tickenham) which are capable of making a contribution to the housing target without placing an unreasonable demand on local services and facilities. The deletion of existing settlement boundaries from such settlements will remove this small, but important, source of windfall sites making local communities less sustainable environmentally, economically and socially.
Changes to be justified	The Core Strategy should not delete the settlement boundaries of villages which are not Service Villages or Infill Villages, where settlement boundaries already exist (per Replacement Local Plan).
Not effective	The removal of settlement boundaries within existing rural settlements will limit development to that which is compatible with the open countryside thereby placing unnecessary restrictions on development in such villages. As a result, the policy is inflexible.
Changes to be effective	Do not delete the settlement boundaries of existing villages (as defined in the Replacement Local Plan).
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Mrs V Hosken

Respondent Name	Mrs V Hosken
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Comment ID	4601313/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be justified	It is considered that some of the Infill Villages, particularly those close to the Weston Urban Area, provide a range of services and amenities, and have access to employment opportunities in the urban area, making them suitable for development beyond that currently proposed in the Core Strategy. Settlements such as Kewstoke and Locking, for instance, are capable of accommodating small scale development within and immediately adjoining existing settlement boundaries (through site allocations).
Not effective	The Core Strategy fails to provide sufficient land within the district to accommodate the higher growth advocated by us in our response to Policy CS13.
Changes to be effective	It is considered that some of the Infill Villages, particularly those close to the Weston Urban Area, provide a range of services and amenities, and have access to employment opportunities in the urban area, making them suitable for development beyond that currently proposed in the Core Strategy. Settlements such as Kewstoke and Locking, for instance, are capable of accommodating small scale development within and immediately adjoining existing settlement boundaries (through site allocations).
Not consistent with national policy	
Changes to be consistent	

Attached documents

Respondent P J Planning

Respondent Name	P J Planning
Comment ID	4601985/CSPV/1
Respondent Organisation	PJ Planning
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with	The final sentence in the penultimate paragraph of CS33 aims to prevent all new employment development in the Green Belt. This is inconsistent with PPG2 which, at paragraph 3.8, states that the re-use of buildings inside a Green Belt is not inappropriate development providing certain conditions are met. Since North Somerset contains a number of existing premises, themselves

national policy	lawful, outside settlement boundaries, it is wrong of the Core Strategy to ignore the potential for them to provide employment development in an appropriate way. This is particularly so since the second paragraph of CS20 specifically recognises this potential source of employment: "Priority will be given to the reuse of previously developed land and the safeguarding of sites in existing economic use."
Changes to be consistent	The final sentence of the penultimate paragraph in CS33 should be amended to read: "New employment development will not be permitted in the Green Belt except in accordance with paragraph 3.8 of PPG2."
Attached documents	

Respondent Portbury Parish Council

Respondent Name	Portbury Parish Council
Comment ID	1569505/CSPV/19
Respondent Organisation	Portbury Parish Council
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Sanders Executive Pension Fund

Respondent Name	Sanders Executive Pension Fund
Comment ID	4614081/CSPV/3
Respondent Organisation	
Do you consider this part of the Core Strategy to be sound?	No
Not justified	<p>Bleadon is identified as one of the 'Infill Villages' and where new residential development is restricted to replacement dwellings, infill development etc. The Policy does allow scope for small scale residential redevelopment where the proposal is community led, with clear community and environmental benefits. Notwithstanding the representations to Policy CS32, that seek to upgrade Bleadon to a Service Village, equally Policy CS33 is unduly restrictive insofar as it must allow scope, subject to the availability and suitability of alternative sites, for new housing development to come forward. As well as the need for any such development to offer clear community and environmental benefits, schemes should be of an appropriate scale and nature, whether they come forward on Greenfield sites, either within or adjacent to the settlement boundary as part of the 'sequential process' towards delivering new housing development. There are clear examples of where such development has come forward within Infill Villages in the past within North Somerset and where community and environmental benefits have been accrued and delivered in association with new housing development with great success.</p>
Changes to be justified	<p>Policy CS33, in its current form, is unduly restrictive, but with suitable and subtle revision to its wording, should exceptionally allow for larger scale new housing schemes to come forward, subject to these being community led, with community support, and subject to this being the only reasonable alternative following the consideration of alternative development on 'brownfield' sites within the Village.</p>

Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Section CS34

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/17
Respondent Organisation	Ashton Park Limited

Do you consider this part of the Core Strategy to be sound?	No
Not justified	The effect of this policy is to introduce a whole range of new charges that seek to pass over the costs of all services , both capital and revenue costs that might possibly be incurred by a whole range of providers , Highways Agency , local government , health authority , fire and police , jobs agencies without any clear justification for this other than a local tax raising opportunity by the Council. The charges may not always be directly related to the development itself or the needs of the occupiers of the new homes , the maintenance of new community facilities that they may use for example , revenue funding for adult social care or the provision of employment agencies and recruitment and training .
Changes to be justified	See attached form.
Not effective	Many of these services , such as waste management are paid for through local taxation where the charges are levelled to all consumers. There is no basis in planning for the council seeking to recover funds for many of these services through this mechanism where there are already in place appropriate arrangements to recover these costs. There is no basis to ensure that funds to secure adult social care in perpetuity (15 years) through a roof tax amounting to Â£40, 000, 000 for its future revenue support can be a) justified and b). monitored c). secured over that period.
Changes to be effective	See attached form.
Not consistent with national policy	See attached form.

Changes to be consistent	See attached form.
Attached documents	Ashton Park Ltd response CS34.doc (98Kb)

Respondent Avon & Somerset Constabulary (RPS)

Respondent Name	Avon & Somerset Constabulary (RPS)
Comment ID	4594753/CSPV/1
Respondent Organisation	Avon & Somerset Constabulary
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	The Constabulary wish to register thier support for policy CS34 and considers it sufficiently sets out the Authorities requirements for Infrastructure Delivery and Contributions, referring to the more detailed information currently within the IDP and SPD documents. The information within these documents is also supported by the Constabulary, recognising resource requirements and the need for capital contributions towards police resources as a result of planned and unplanned growth.
Changes to be justified	
Not effective	

Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bloor Homes

Respondent Name	Bloor Homes
Comment ID	4615521/CSPV/15
Respondent Organisation	Bloor Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	No viability assessment has been completed to confirm how the levy is set.
Changes to be justified	Viability assessments are completed before any levy levels are set and the policy is not implemented until the assessments have been completed.

Not effective	We object to this Policy as there is no recognition of the significant costs that these other policies of the Plan notably CS16 requirements will bring to developments which in addition with other contributions sought by this policy will render many housing, employment and other developments unviable. This will completely undermine the delivery of the required housing, employment and other developments necessary to attain the sustainable development of North Somerset.
Changes to be effective	The policy be deleted and rewritten to identify that in setting the levels due regard will be paid to the impact of availability of CS16 on developments.
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Bristol Water plc - Turley Associates

Respondent Name	Bristol Water plc - Turley Associates
Comment ID	4002849/CSPV/6
Respondent Organisation	Turley Associates
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	<p>Bristol Water is a significant utility provider in the North Somerset area and has a number of operational and other land interests within North Somerset. As a result, it is important that North Somerset Council recognises that development in these locations must be considered and planned for comprehensively by Bristol Water and appropriately accounted for by each Authority. This is a necessary consideration with regard to ensuring a sustainable and resilient means of meeting water supply and demand. Bristol Water's role as a statutory undertaker will need to be carefully considered in order to ensure that development needs can be met, taking account of cumulative impacts and cross-boundary considerations. The Core Strategy indicates that Weston-super-Mare remains a focus for significant growth, and accordingly, this growth will need to be served by appropriate water infrastructure. As previously set out in our representations of 18 November 2010, Bristol Water is in the process of reviewing the requirement for a new raw water reservoir to serve the forecast growth of Weston-super-Mare and the wider local area. Based on current information, it is envisaged that the reservoir will be located within the administrative area of Sedgemoor District; however, there is a high degree of uncertainty with regards the precise nature, timing and location of the project (this was also set out in our representations of 18 November 2010). The Core Strategy makes no reference to infrastructure 'projects', and the Draft Infrastructure Plan only addresses those projects listed therein. The Core Strategy does not provide for appropriate monitoring and review such that contingencies can be properly planned for in the event of other medium or large scale strategic infrastructure development (such as a new reservoir). The LPA must provide for built-in flexibility in relation to such projects in order for the Core strategy to be considered 'effective'.</p>
Changes to be effective	
Not consistent with national policy	<p>It is our view that capacity constraints, including 'infrastructure delivery' constraints, are an important component of the Core Strategy. As we have highlighted through our earlier representations, Bristol Water Plc is key to water infrastructure delivery in North Somerset, and is therefore of critical importance to the delivery of development in the Plan area. There is a lack of clarity and coherency in relation to the way in which the information has been presented. There is, for example, no clear statement to demonstrate that the LPA understands what physical infrastructure actually is, and that it includes utility providers, and water</p>

	<p>infrastructure. We consider that a clearer statement of 'infrastructure' is therefore required. National Policy PPS12 requires LPA's to consider infrastructure in terms of phasing, funding, need, cost and responsibility for delivery. We do not consider that the Core Strategy (or the Draft Infrastructure Delivery Plan) provide a robust assessment of these issues. Core Strategy Policy CS34 focuses on financial contributions from development. We welcome the indicated support for contributions to be provided towards the management and maintenance of services and facilities, but consider that this should be set within the context of a clear statement of infrastructure requirements that accords with PPS12. Water should be considered as part of the key infrastructure necessary to deliver growth, and the Core Strategy must therefore properly consider water supply and the need to provide planning controls appropriate to improve water efficiency and reduce water consumption (and the LPA should not assume that such matters can be addressed through an Infrastructure Delivery Plan, if there is no appropriate broad strategic framework proposed within the Core Strategy).</p>
Changes to be consistent	<p>We consider that a clearer statement of 'infrastructure' is required in line with PPS12. Water should be considered as part of the key infrastructure necessary to deliver growth, and the Core Strategy must therefore properly consider water supply and the need to provide planning controls appropriate to improve water efficiency and reduce water consumption.</p>
Attached documents	<p>Bristol Water response by Turley Associates.pdf (260Kb)</p>

Respondent Home Builders Federation Ltd

Respondent Name	Home Builders Federation Ltd
Comment ID	2549089/CSPV/7
Respondent Organisation	Home Builders Federation Ltd
Do you consider this part of the	No

Core Strategy to be sound?	
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	<p>The policy is unsound in the form it is currently drafted and should be amended to refer to the need for the Council to set out how, going forward, it will need to assess the cost of infrastructure and seek an appropriate level of contribution from developers through the mechanism of the Community Infrastructure Levy (CIL). The policy as worded (and supporting text from paragraph 5.6 onwards) gives the impression that standards and formulae can still be used as a basis on which to raise contributions towards general infrastructure via the Section 106 mechanism when this will not be the case. The Council will need to set a CIL Charging Schedule to do so. Reference to the Development Contributions SPD should be deleted and references to the CIL and a Charging Schedule should be substituted. The text is also contrary to national policy by maintaining that "in all cases developers will be expected to minimise the cost to the public purse in the context of the current public funding situation". This is wrong and demonstrates a misunderstanding of the purpose of S106 and CIL payments. S106 obligations are sought to make developments acceptable in planning terms. They are not to be used as a means of securing for the community a share in the profits of development which is what is implied here (paragraph B7, Circular 05/2005). CIL payments will need to be based upon an assessment of what infrastructure is necessary across the district and what developers can fairly contribute to while still ensuring that development remains viable in the majority of cases.</p>
Changes to be consistent	<p>The references to seeking contributions to the management and maintenance of services and facilities should also be deleted. CIL payments can only support capital works. As a general rule S106 Obligations towards long-term maintenance funds are only legitimate when the facilities are predominantly for the benefit of the users of the development, not if the asset is intended for wider public use (Circular 05/2005, paragraph B19).</p>

Attached documents

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/16
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	Whilst Mead Realisations is not objecting to the principle of an infrastructure delivery contribution, concern is expressed about the apparent lack of proper viability testing of the emerging Developer Contributions DPD. Linking this with a Development Plan policy that also has no reference to proper viability testing will result in an inflexible policy which is not therefore effective. It is noted that policy CS34 levies the standard charge in addition to other S106 obligations, including affordable housing provision. Again, this further brings into question the ability to deliver schemes in a viable manner. It also raises significant levels of uncertainty that is unlikely to assist the delivery of development.

Changes to be effective	Additional reference should be made to viability testing of the emerging developer contributions DPD and of individual schemes against any comprehensive contributions package.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/27
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No

Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	<p>This Policy is not in conformity with National Policy. Persimmon Homes consider the Policy is contrary to National Guidance for the following reasons: - 1.The Policy and supporting paragraphs are based on applying a series of standard charges through a Developer Contributions DPD "until such time as the Council considers an alternative approach". In our view the alternative approach is required now. S106 contributions have to conform with Regulation 122 of the CIL Regulations which came into force on the 6th April 2010. These Regulations are in force now and should be applied irrespective of the Council's view that changes may be introduced through the Localism Bill which is used as a reason for not preparing a CIL Charging Schedule immediately. Contributions set out in a SPD will therefore be challengeable. The Council should proceed straight to a CIL Charging Schedule which will be subject to a full Examination in its own right. 2.Policy CS34 cannot require contributions to meet the management and maintenance of services and facilities. CIL can only be used for capital works and S106 obligations for management measures have to relate directly to the development and cannot be used for general management and maintenance works. 3.Policy CS34 cannot require Developers to minimise the cost of the public purse. This is the wrong test. Obligations should only be sought to make development acceptable, or to mitigate the impacts of development. For the above reasons, Persimmon Homes considers that Policy CS34 should be replaced by an intention to prepare a CIL Charging Schedule, rather than a Developer Contributions SPD.</p>
Changes to be consistent	<p>Persimmon Homes considers that Policy CS34 should be replaced by an intention to prepare a CIL Charging Schedule, rather than a Developer Contributions SPD.</p>
Attached documents	

Respondent South West RP Planning Consortium

Respondent Name	South West RP Planning Consortium
Comment ID	4209025/CSPV/13
Respondent Organisation	-
Do you consider this part of the Core Strategy to be sound?	Yes
Not justified	
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	South West RP Planning Consortium (72Kb) Previous Reps on Developer Contributions SPD (83Kb)

Respondent The Bristol Port Company

Respondent Name	The Bristol Port Company
Comment ID	1025793/CSPV/6
Respondent Organisation	The Bristol Port Company
Do you consider this part of the Core Strategy to be sound?	No

Not justified	Policy CS34 on Development Contributions should be consistent with the Draft Development Contributions SPD which clearly denoted that contributions would not be sought for employment/economic related development.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	
Attached documents	

Respondent Woodland Trust

Respondent Name	Woodland Trust
Comment ID	3326881/CSPV/4
Respondent Organisation	Woodland Trust
Do you consider this part of the Core Strategy to be sound?	No
Not justified	

Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	CS34: Infrastructure delivery and development contributions We would like to see this Delivery Policy wording clearly confirm that the definition of 'Infrastructure' specifically includes Green Infrastructure. Planning Policy Statement (PPS) 12 requires that Core Strategies are supported by evidence of green infrastructure (Communities & Local Government, 2008, para 4.8). Natural England's 'Green Infrastructure Guidance' (NE 176, Natural England, 2009) states that: 'The provision of green infrastructure in and around urban areas is now widely recognised as contributing towards creating places where people want to live and work. The concept of green infrastructure is embodied in the Government's Planning Policy Statements (PPS) 1 and 12. It is an essential component of good planning for urban and rural areas, particularly in the face of climate change'.
Changes to be consistent	We would like to see the wording to sub-paragraph 'Infrastructure Delivery' amended to read (additions in bold): 'Infrastructure, including green infrastructure, will take place in a coordinated manner...'
Attached documents	

Section Superseded Policies

Respondent Campaign to Protect Rural England

Respondent Name	Campaign to Protect Rural England
Comment ID	705793/CSPV/30

Respondent Organisation	Campaign to Protect Rural England
Do you consider this part of the Core Strategy to be sound?	No
Not justified	In November 2009 NSC released "Core Strategy Consultation Draft - Proposed programme for replacement of Adopted North Somerset Replacement Local Plan Policies". It indicates that all of the RLP policies are to be replaced by policies in the Core Strategy. However it is not clear that this has been achieved Appendix A: Superseded Policies Appendix A indicates that RLP policies RT/1 and RT/6 have been superseded by policies CS21 and CS31 and PPS4 (Planning for Sustainable Economic Growth). It is not clear which aspects of PPS4 are relevant here over and above those that are covered in CS21 & CS31. To resolve this unsound ambiguity these reference to PPG4 should be removed and the policies should be extended to cover that part of PPG4's content which lead to the inclusion of PPG4 in Appendix A.
Changes to be justified	
Not effective	
Changes to be effective	
Not consistent with national policy	
Changes to be consistent	

Attached documents

Section Key Diagram

Respondent Ashton Park Limited

Respondent Name	Ashton Park Limited
Comment ID	1058273/CSPV/19
Respondent Organisation	Ashton Park Limited
Do you consider this part of the Core Strategy to be sound?	No
Not justified	Whilst supporting a proposed modification to the CS to take account of the overriding need to provide upwards of 9000+ new homes (in accordance with the RSS recommendations and the evidence base including BA evidence) Option 1, it is recommended that the Council review the evidence and consider whether an alternative , smaller option, concentrating development in the 'bowl' to the south of the Yanley Ridge would address the immediate needs of NS and amount to exceptional circumstances.** It will be our case that the Inspector should take account of the evidence in support of AP, including the numerous studies by Broadway Malan and if it is concluded that there are exceptional circumstances which cannot be met by other policies and strategies in the CS, that the general extent of the GB should be modified either in accordance with Inset 3 Option 1 or Inset 3 Option 2. We

	<p>believe there is sufficient evidence to determine which alternative is the most appropriate in the circumstances. ** Note that the studies by Broadway Malan of the overall assessment of the area to the South West of Bristol ,included the proposed location to the south and south west of Long Ashton promoted by Bristol University. It should be noted that we do not support this area for future growth for the reasons given in BA App1 and because it is poorly connected to the centre of growth at Ashton Park , transport facilities etc. It is our view that this area should remain in GB and its significance as an area of open country side beneath the Yanley Ridge, separating Long Ashton from any future growth, be preserved. To the east, the landscape feature of the Yanley Ridge escarpment , which runs down to the railway line running east west, forms a strong and open landscape feature extending in to the Bristol conurbation at Bedminster. It is recommended that in either Option, this feature be strengthened by designation as a strategic Gap CS 19 and shown on the Inset Plan. (See full rep)</p>
<p>Changes to be justified</p>	<p>The CS will include alteration to the Key Diagram to provide inter alia a new Inset Plan , Inset 3 . The Inset 3 will show broad details/ features of the proposed new urban extension at Ashton Park together with the general extent of the Green Belt which is to be altered in this area to accommodate the development. These representations are supported by numerous studies by Baker Associates , Land Trust and the landowners at Ashton Park and by Broadway Malan on behalf of the Council. Many of these studies including the results of the Local Workshops -Architecture Urbanism Design; the Masterplanning Exercise should be read alongside and in support of this submission. There are two alternative Inset 3 proposals which can be found below. These propose alternative scales of development associated with AP and consequently require the general extent of the GB to be altered in different ways. Inset 3 Option 1 broadly follows the strategic policy approach set out in the RSS and is the subject of a extant planning application before NS by Land Trust Developments. This option is supported by BA evidence in BA App1 and App2 as well as numerous studies which can be found on the Councils website. Option 1 will deliver over 9000 new homes to the south west of Bristol. Inset 3 Option 2 proposes a more modest scale of development at Ashton Park with a consequential reduction in the amount of land removed from the GB. It follows the comprehensive studies carried out on behalf of the Council by Broadway Malan, in particular 'Alternative Growth Options Study' 2009. One of the recommendations from that study is that any urban extension should be concentrated in one area due to the 'disconnected character of parts of the site. (see full rep)</p>
<p>Not effective</p>	<p>Whilst supporting a proposed modification to the CS to take account of the overriding need to provide upwards of 9000+ new homes (in accordance with the RSS recommendations and the evidence base including BA evidence) Option 1, it is recommended that the Council review the evidence and consider whether an alternative , smaller option, concentrating development in the 'bowl' to the south of the Yanley Ridge would address the immediate needs of NS and amount to exceptional circumstances.** It will be our case that the Inspector should take account of the evidence in support of AP, including the numerous studies by Broadway Malan and if it is concluded that there are exceptional circumstances which cannot be met by other policies and strategies in the</p>

	<p>CS, that the general extent of the GB should be modified either in accordance with Inset 3 Option 1 or Inset 3 Option 2. We believe there is sufficient evidence to determine which alternative is the most appropriate in the circumstances. ** Note that the studies by Broadway Malan of the overall assessment of the area to the South West of Bristol ,included the proposed location to the south and south west of Long Ashton promoted by Bristol University. It should be noted that we do not support this area for future growth for the reasons given in BA App1 and because it is poorly connected to the centre of growth at Ashton Park , transport facilities etc. It is our view that this area should remain in GB and its significance as an area of open country side beneath the Yanley Ridge, separating Long Ashton from any future growth, be preserved. To the east, the landscape feature of the Yanley Ridge escarpment , which runs down to the railway line running east west, forms a strong and open landscape feature extending in to the Bristol conurbation at Bedminster. It is recommended that in either Option, this feature be strengthened by designation as a strategic Gap CS 19 and shown on the Inset Plan. (see full rep)</p>
<p>Changes to be effective</p>	<p>The CS will include alteration to the Key Diagram to provide inter alia a new Inset Plan , Inset 3 . The Inset 3 will show broad details/ features of the proposed new urban extension at Ashton Park together with the general extent of the Green Belt which is to be altered in this area to accommodate the development. These representations are supported by numerous studies by Baker Associates , Land Trust and the landowners at Ashton Park and by Broadway Malan on behalf of the Council. Many of these studies including the results of the Local Workshops -Architecture Urbanism Design; the Masterplanning Exercise should be read alongside and in support of this submission. There are two alternative Inset 3 proposals which can be found below. These propose alternative scales of development associated with AP and consequently require the general extent of the GB to be altered in different ways. Inset 3 Option 1 broadly follows the strategic policy approach set out in the RSS and is the subject of a extant planning application before NS by Land Trust Developments. This option is supported by BA evidence in BA App1 and App2 as well as numerous studies which can be found on the Councils website. Option 1 will deliver over 9000 new homes to the south west of Bristol. Inset 3 Option 2 proposes a more modest scale of development at Ashton Park with a consequential reduction in the amount of land removed from the GB. It follows the comprehensive studies carried out on behalf of the Council by Broadway Malan, in particular 'Alternative Growth Options Study' 2009. One of the recommendations from that study is that any urban extension should be concentrated in one area due to the 'disconnected character of parts of the site. (see full rep)</p>
<p>Not consistent with national policy</p>	

Changes to be consistent	
Attached documents	Ashton Park Ltd -new inset plan (7.2Mb)

Respondent Mead Realisations and the Manor Farm Consortium

Respondent Name	Mead Realisations and the Manor Farm Consortium
Comment ID	4208577/CSPV/17
Respondent Organisation	Origin3
Do you consider this part of the Core Strategy to be sound?	No
Not justified	
Changes to be justified	
Not effective	It is not considered effective for the Core Strategy to set out a defined redline boundary around the Weston Villages, particularly when this has not be justified through appropriate capacity studies. Whilst, the Core Strategy should identify location specific parameters for the Weston Villages it should not provide site specific parameters. The redline boundaries are inflexible in their

	current form and should be less definitive as to allow for more definitive boundaries to be formed through future DPDs and SPDs. For more detailed commentary on Weston Villages specifically please refer to representations made for Policy CS30.
Changes to be effective	Revise boundary around the Proposals Map to show less definitive boundaries showing location only.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Mead Realisations Ltd response.pdf (282Kb)

Respondent Mr and Mrs P Moss

Respondent Name	Mr and Mrs P Moss
Comment ID	3556961/CSPV/3
Respondent Organisation	-
Do you consider this part of the Core	No

Strategy to be sound?	
Not justified	Inset 2 The boundaries on the Inset plan follow arbitrary field boundaries which are not backed up by research supporting the positions adopted.
Changes to be justified	The boundaries should be drawn in positions which follow defensible boundaries, and which allow for the provision of strategic infrastructure. In the instance of Parklands Village, the boundary of the proposed development area should extend along the site's frontage with A371 to ensure that provision is made for additional access points and strategic infrastructure, where required. In addition, the inclusion of land adjacent to the A371 would provide land which falls within Flood Zone 1 and, sequentially, the most suitable land for built, mixed-use, development. We attach a plan showing the suggested southern extension of the proposed Parklands Village.
Not effective	We believe that the proposed development area includes land which is owned by parties who are not currently 'signed up' to the proposals. This, potentially, affects the delivery of the development and should be avoided. In addition, the plan should allow greater flexibility to include additional land where this is reasonably required for the purpose of masterplanning the development area.
Changes to be effective	The Inset Map should exclude land owned by third parties who are not interested/prepared to get involved in the masterplanning process. In addition, greater flexibility should be built-in to allow for the inclusion of adjoining areas where they are required for the proper masterplanning of the area.
Not consistent with national policy	
Changes to be consistent	
Attached documents	Parklands Village land - map (1.2Mb)

Respondent Persimmon Special Projects Western

Respondent Name	Persimmon Special Projects Western
Comment ID	3998081/CSPV/24
Respondent Organisation	Persimmon Homes
Do you consider this part of the Core Strategy to be sound?	No
Not justified	The Inset Diagram 2 is not justified or effective. Firstly, the Inset Diagram is unclear. The Key does not show what the brown shading is and it cannot be the same for both Winterstoke Village and Parklands Village. In our view the brown area at Winterstoke Village should be shown as residential development. The brown area at Parklands Village is mixed-use development where, in line with the adopted Local Plan, residential and employment development will be fully integrated. Therefore, this distinction should be made clear. Secondly, what is the grey area in the South and East of Winterstoke Village? Is this meant to delineate the flood protection area? If it is, the area shown is wrong, as it fails to incorporate the future employment area shown on the Persimmon Comprehensive Land Use Plan which accompanied the residential planning application and the Inset Diagram should be amended accordingly.
Changes to be justified	
Not effective	
Changes to be effective	

Not consistent with national policy	
Changes to be consistent	
Attached documents	

Report run at 28 Jun 2011 10:48:44. Total records: 364.