

North Somerset Local Plan 2038: Challenges and Choices Part 2

Choices for the Future

Consultation Statement

February 2021



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1. Consultation Method and Response.

Introduction

This document explains how North Somerset Council undertook consultation in on the North Somerset Local Plan 2038 – Challenges and Choices Part 2: Choices for the Future Consultation (Nov - Dec 2020). It sets out how the Council sought participation from communities and stakeholders across North Somerset. It covers:

- Which bodies and persons were invited to make comments;
- How those bodies and persons were invited to make comment;
- The material that was subject to consultation
- Analysis of the quantitative data from the questionnaire
- Analysis of the qualitative data from the questionnaire

This consultation statement complies with the North Somerset's Statement of Community Involvement (SCI). The SCI outlines that the Council is committed to effective community engagement and seeks to use a wide range of methods for involving the community in the plan making process.

Background

The new Local Plan for North Somerset was launched in March 2020 with the publication of the Local Development Scheme (LDS), which sets out the timetable for the Local Plan, and the Pre-commencement Document which outlines the scope of the plan. These two publications marked the formal start of the process. Consultation on the Pre-commencement document ran from 10 March until 22 April 2020.

Following the launch of the new Local Plan a draft Challenges and Choices consultation document was prepared and presented to the Councils Executive on 29th April 2020. This document identified the key issues facing the district and considered some spatial strategy options for future development.

At the <u>Executive</u> meeting it was proposed to undertake a two-stage consultation process rather than consult on the document as a whole. This was due to the difficulties and uncertainties brought on by the Covid-19 pandemic, both in terms of engaging effectively during the lockdown, and in terms of allowing time to get a better understanding of the longer term economic impacts of the crisis and the implication for North Somerset. The impact of Covid-19 on the housing market and the implications of this for North Somerset's housing needs also required further consideration.



The <u>first stage</u> of the Challenges and Choices consultation took place between 22 July and 2 September 2020 and focused on the Challenges facing North Somerset including the climate emergency, supporting our economy, providing homes and creating communities, creating a sustainable future, protecting important green and blue spaces, and considering the future role of the Green Belt, and the proposed strategic priorities.

A <u>Consultation Statement</u> was published setting out the results from the Challenges consultation which were then used to help to inform the second stage of consultation called Choices for the Future.

The <u>Choices for the Future</u> consultation focused on the choices around the broad distribution of growth and identified four possible approaches: Retain the Green Belt, Urban Focus, Transport Corridors and Greater Dispersal. This consultation took place from 2 November – 14 December 2020.

This report sets out how the Choices for the Future consultation was undertaken, what level of response was achieved, what the main issues raised were and how feedback from the consultation will inform progressing with the Local Plan to decide a preferred spatial strategy.

Consultation Method

Who was consulted?

At the Executive on 29th April 2020 the Members stressed the importance of a robust consultation process that allowed for contributions from all ages and interests across the district and was open and transparent and arrived at clear objectives.

With that in mind the aim was to hear from as wide a range of people as possible including young people, businesses, community groups, interest groups, town and parish councils, landowners, housebuilders, transport providers, retailers and anyone else who wanted to contribute.

Consulting with these groups was undertaken through a variety of mediums including emailing over 5000 people on the planning policy database, press releases, articles in the free press, posts on social media, targeting schools and colleges and employers with a young workforce, and virtual meetings and presentations to relevant groups. These methods are detailed below.

Unfortunately, the continuation of restrictions due to the Covid-19 pandemic has meant we have been unable to hold face to face consultation for this stage.



How we consulted.

The consultation on the Local Plan 2038: Choices for the Future document commenced on 2 November 2020 and ran for 6 weeks until 14 December 2020. During this period numerous consultation methods were used to inform the public of the consultation and maintain interest and momentum in the process. The following methods were used to consult:

Website and online consultation

The Councils Local Plan 2038 webpages contained all the details relevant to the consultation including the consultation document and a link to an online questionnaire.

This information, with a link to the website and to the online consultation system, was sent out to all 5000+ stakeholders who were registered on our Planning Policy database at the start of the consultation. The database includes parish councils, adjacent authorities and parishes, planning agents, statutory consultees, local pressure groups and organisations as well as local residents and individuals. This included dutyto-cooperate contacts in relation to strategic cross-boundary issues.

A further e-mail was sent out two weeks before the closing date to remind people to take part.

Telephone

Cllr Tonkin, the Executive Member for Planning and Transport, telephoned all the Town and Parish Councils at the beginning of the consultation to ensure they were aware of the process and explain how they could get involved. He also contacted Town and Parish Councils towards the end of the consultation to make sure they had been able to submit a response if they wished to do so.

Press/publications/Information

- At the beginning of the consultation process information packs were sent out to all town and parish councils informing them of the consultation with links to all the consultation document and online questionnaire. They were also informed about the start of the consultation via a wider e-mail from the planning policy database which all town and parish councils are registered on.
- Two press releases were issued. These were carried online by Weston Mercury, North Somerset Times, Somerset Live, InNorth Somerset and North Somerset Enterprise Agency websites
- A double page spread in Winter North Somerset Life magazine delivered to 100,000 households in North Somerset.
- Two articles were included in Town and parish digest at the beginning and middle of the consultation period.
- Two articles in Stakeholder Update at the beginning and middle of the consultation period.
- Two articles in Members Only (circulated to NSC councillors) at the beginning and middle of the consultation period.
- Two articles in the Knowledge (internal North Somerset Council newsletter)
- Two articles in eLife (the online version of the North Somerset Council Magazine North Somerset Life)
- An article in a local business e-newsletter.



Events

Town and Parish Councils

• Two information sessions were held with town and parish councils using Teams on 16th and 20th November. 41 representatives from different Town and Parish Councils attended these events.

Business community

• Presentation to Business West on the 24 November explaining the different approaches set out in the consultation document. There were 60 businesses at this meeting from across the West of England business community.

Social Media

- Three posts on Facebook during the consultation period which reached 32,212 people with 2,947 people engaging with them.
- Three posts on Twitter on which resulted in 4,142 impressions and 79 engagements
- The following information videos were also posted on YouTube as well as being embedded in the questionnaire. They recieved 1,528 views:

How to have your say Development Constraints Approach 1: Retain the Green Belt Approach 2: Urban Focus Approach 3: Transport Corridors Approach 4: Greater Dispersal

Engagement with Young People

A targeted action plan to engage with you people led by the Councils Youth Champions, Cllr James and Cllr Connelly, aimed to encourage more people under 30 to participate in the consultation.

The campaign involved a Facebook post targeted at under 30s and boosted to Facebook users specifically within this age category. This reached 9,766 under 30's and 602 of those it reached engaged with the post.

Cllr Huw James shared posts and a video aimed at young people on his own Facebook, Twitter and Instagram, which were also boosted to under 30s.



Advocates and ambassadors were also identified within certain organisations who agreed to pass on information about the Local Plan consultation to their own audiences. These organisations included colleges, sixth forms, youth groups, and major employers likely to have high proportion of under 30s. They were supplied with visual material and text such as adverts for display screens, suggested text for an email / newsletter article, visual for newsletters to share on our behalf to help get the message across.

A press release with the headline "Local Plan 2038: young people urged to have their say" was also sent out to all local media contacts and customer-facing teams within the council (over 100 email addresses) on 2 December, as well as published on our website at https://www.n-somerset.gov.uk/news/local-plan-2038-young-people-urged-have-their-say the same day.



Consultation Response Data

Level of response.

There were **1675** respondents who responded to the consultation in total. The vast majority (96%) responded via the online questionnaire which was very encouraging and may be due to the messaging that this was the most effective way to respond along with the fact that due to the Covid-19 pandemic people have generally become a lot more used to using computers and technology. We had very positive

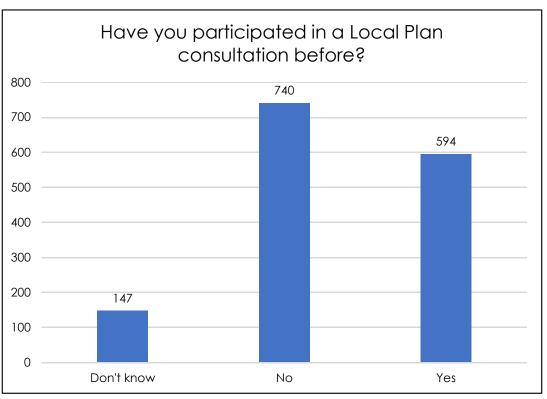
feedback from many people for our use of the questionnaire format in that it was much more engaging and straightforward to use than other types of engagement tool.

A few people felt that the questionnaire format was too restrictive. However, the questionnaire did allow for open answers where respondents could provide a lengthier, more detailed response if they wished.

A small minority of people chose to e-mail in their responses or send their responses by post. In total 24 people posted responses and 38 e-mailed their responses.

25 out of 38 Town and Parish Councils responded to the consultation with 23 responding directly onto the online questionnaire.

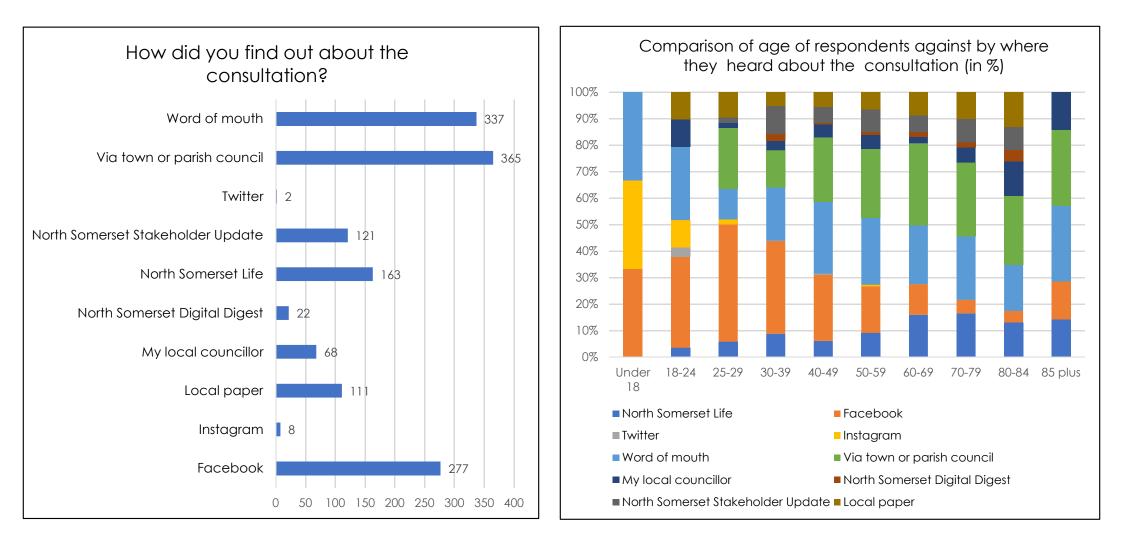
Of those who responded 740 stated that they had never participated in a Local Plan consultation before compared to 594 who said they had. 147 weren't sure as to whether they had or not. Respondents weren't required to answer this question.





How did you hear about the consultation?

When asked how they found out about the consultation the main methods, as shown on the chart below, were via Facebook, word of mouth or via their town or parish council. The adjacent chart compares the age of respondents against the way they found out about the consultation. Younger respondents mainly found out about it via social media, specifically Facebook, whereas older respondents found out about the about the consultation via word of mouth, their town or parish council or, for the respondents who were 80+ from their local councilors.



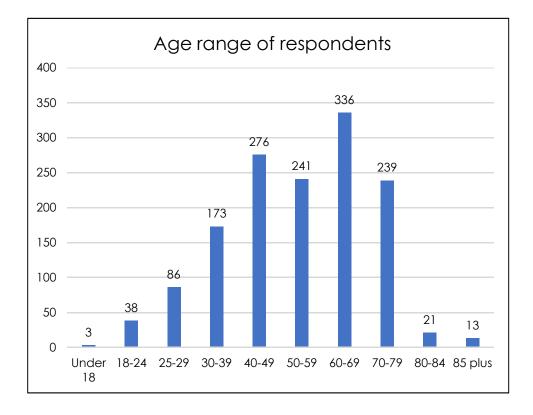
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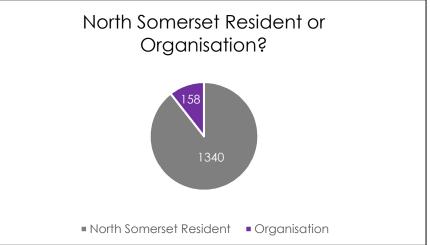
Who responded?

The majority of the respondents were residents of North Somerset with 1340 stating they were residents compared to 158 who said they were responding on behalf of an organisation.

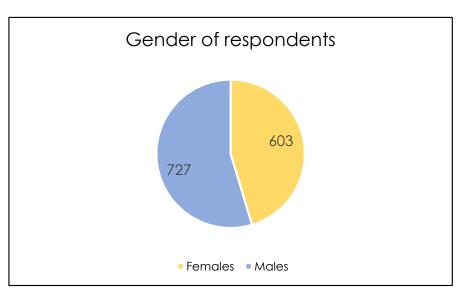
In terms of the age of respondents 127 people who responded were under 30 which is an age group which is typically under-represented. The number of under 30s that responded is higher than expected and could be a result of the targeted campaign to engage this age group.

The largest age group that responded was the 60-69 age bracket with 336 people responding within this age bracket. Over 70s accounted for 273 people who answered this question.

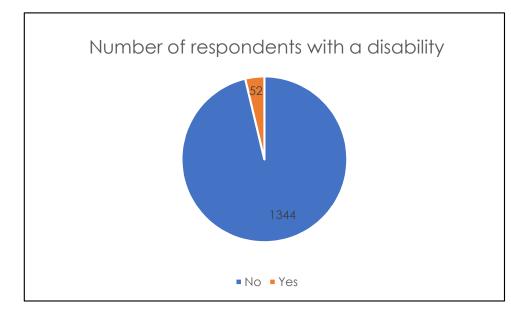




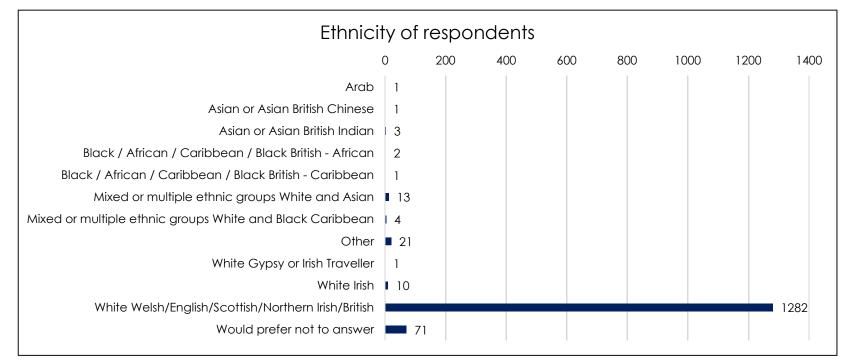
In terms of the gender split slightly more men responded than woman with 55% being male and 45% being female.



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There were 52 people who responded to the questionnaire who had a disability and the majority of respondents were white with 1282 putting their ethnicity as white Welsh/English/Scottish/Northern Irish or British. 71 people did not want to answer this question while 21 put 'other'. 13 people were white/Asian and 10 were white Irish.



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2. Results to the Choices for the Future Consultation Questions.

This section summarises the responses to the consultation questions both in terms of the quantitative results and the qualitative results that were received to each question.

The consultation questionnaire asked six main questions about potential approaches to where new housing, employment and community uses might go over the next 15 years. The questions were:

1. Do you support an approach which maximises the use of brownfield land in the towns?

2. Do you support and approach that avoids putting development in locations that are at risk of flooding?

3. Retain the Green Belt – Do you support or object to this approach?

4. Urban Focus - Do you support or object to this approach?

5. Transport Corridor - Do you support or object to this approach?

6. Greater Dispersal - Do you support or object to this approach?

7. Other ways of delivering Growth – Do you have any suggestions for another way to deliver the growth required?

8. Further comments and specific sites.

CONSULTATION NOVEMBER 2020

NORTH SOMERSET LOCAL PLAN 2038 CHALLENGES AND CHOICES PART 2 Choices for the Future



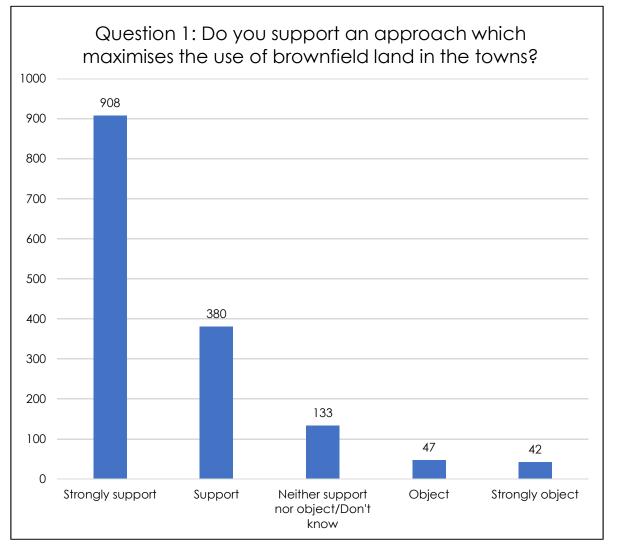


To start the consultation we asked people about a strategy which maximised the use of brownfield land in the towns in North Somerset to deliver some of the new housing requirement. We estimate this will only contribute about 1000-2000 houses over the plan period and it is likely to mean denser development within our towns with potentially more taller buildings. We asked people whether they supported this approach.

The chart below shows that there was over-whelming support for this approach with 908 respondents (60%) strongly supporting maximising the use of brownfield land and 380 respondents (25%) supporting this approach. Therefore out of the people who answered this question 85% of respondents supported this approach overall.

133 of respondents neither supported nor objected or didn't know and their reasons for this are set out below under question 1c.

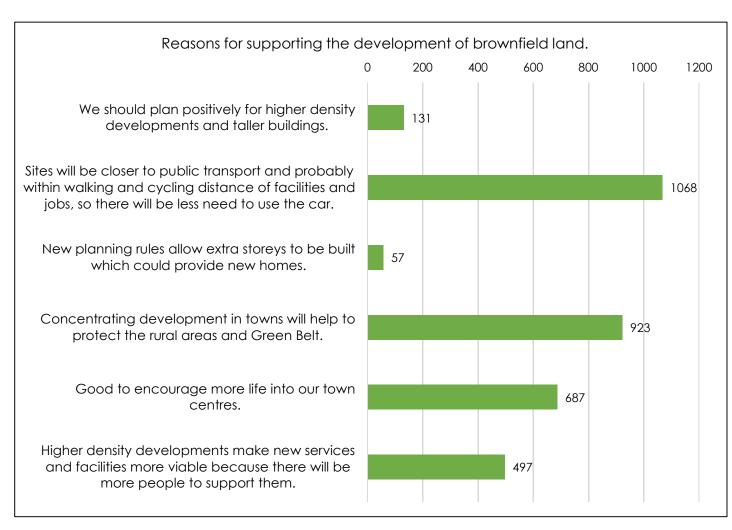
47 respondents objected to this approach and 42 respondents strongly objected to this approach so overall only 6% of respondents objected to a spatial strategy that would maximise brownfield land first.





Question 1a: Reasons for supporting the development on Brownfield Land.

The chart below shows that out of the suggested reasons given in the questionnaire for supporting an approach that maximises brownfield land most respondents (1068) felt it was important so that new housing would be closer to public transport and within walking and cycling distance of a range of facilities and jobs and would therefore help reduce car use. Protecting the Green Belt was the second most popular reason for supporting this approach with 923 respondents citing this as a reason.



We also asked people what other reasons they may have for supporting this approach. **460 respondents added additional reasons or made further comments.**

Some respondents felt that the development of brownfield sites would improve areas of land that are currently derelict eyesores. They felt that brownfield development would have positive regeneration benefits to the towns and could help bring life and vitality back to the town centers.

Others supported prioritising the development of brownfield land because it would protect the countryside, wildlife and biodiversity. This was felt to be particularly important at the moment due to the Covid-19 pandemic and the need to be able to access the countryside for walks and recreation.

There was a feeling that employment land should not be developed for housing as we need to retain employment land to encourage jobs to the towns, although many respondents did feel that if there are empty office blocks (as a result of people working from home permanently) these should be converted to housing.

There was a general feeling that prioritising brownfield land was the most sustainable approach particularly in terms of encouraging increased use of public transport, walking and cycling and less use of the private car which all supports the climate emergency agenda. There was support for higher densities to maximise the use of land, but as long as this was well designed and fitted with the local context.

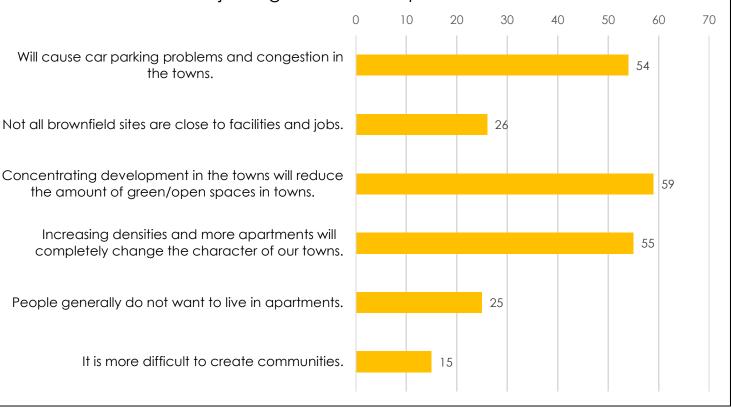
Question 1b: Reasons for objecting to the development on Brownfield Land.

The chart blow shows that out of the suggested reasons given in the questionnaire for objecting to an approach that maximises brownfield land the three main reasons that respondents felt that this was not the right approach was because it may cause more congestion and

parking problems in towns, it may impact on the amount of green open space within urban areas and would negatively impact on the character of our towns.

We also asked people what other reasons they may have for objecting to this approach. **52 respondents added additional reasons or made further comments.**

There was a general concern that a strategy that located more housing in towns would put even more pressure on the existing services and facilities that were already stretched. Weston Hospital was frequently used as an example. There was also concern over the impact on the road network of locating more housing in towns, particularly at Weston-super-Mare and Portishead.



Reasons for objecting to the development of brownfield land

nth merset in the set of the set There were concerns over the ability to deliver houses on brownfield land due to issues with viability and, due to the high costs of development, benefits to the public such as affordable housing and \$106 funding not being lost. Some people also raised the issue that the amount of brownfield land available would only deliver a faction of the housing required.

There was genuine concern amongst respondents, particularly in Weston-super-Mare, about what sort of housing high density development would deliver. There was a feeling that it could be high rise tower blocks which could result in anti-social behavior and not provide good quality accommodation or a good standard of living. People were concerned that high density would result in cramped accommodation not suitable for families with no gardens or outdoor space.

There was also a concern that high density development, or more particularly, high rise development, would be out of character with the existing environment particularly in Weston town centre which is a Conservation Area.

There was also a feeling that brownfield sites should be protected for employment uses.

Question 1c: Further general comments regarding the development of Brownfield Land.

104 respondents added additional comments about development of brownfield land.

Good design and place-making featured strongly within these comments. People generally agreed with the principle of prioritising brownfield sites, but as long as they were well designed, related well the local context and enhanced and regenerated the areas.

It was felt that high density, does not mean high rise and the approach of prioritising brownfield land should not be used as an excuse for 'town cramming'. It was also felt that the ability to deliver brownfield sites shouldn't be at the expense of delivering other important priorities such as affordable housing.

Again many people raised the point that brownfield sites would only deliver a small amount of the housing required and most of the brownfield sites had already been developed. It was felt that there would need to be a mix of brown and greenfield sites to meet the housing requirement.

Some respondents supported the approach to prioritise brownfield sites first but felt that it shouldn't just be the four main towns that are the focus. They felt that the larger villages may also have suitable brownfield sites that should also be considered.



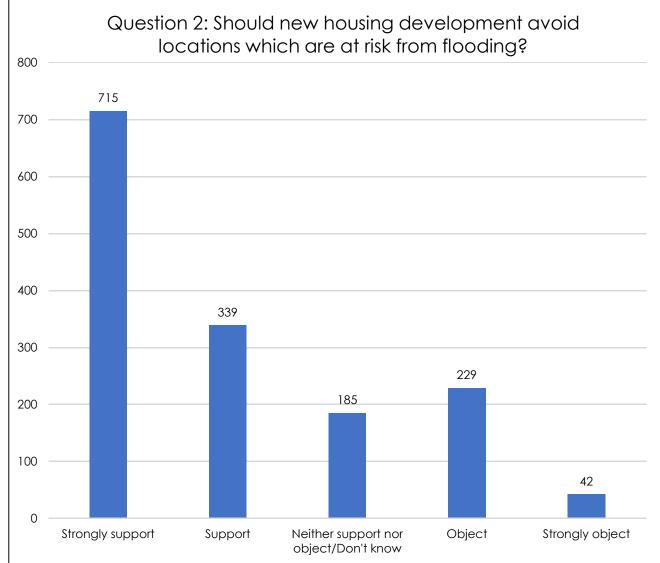
Question 2: Approach to residential development in Flood Zone 3.

Flooding is a major concern in North Somerset with about one third of the district currently regarded as being at risk. This is likely to increase further with climate change. Our suggested approach is to develop a spatial strategy that avoids allocating land for new development in flood zones 3 (the areas at highest risk of flooding). We asked what other people thought of this approach.

There was clear support for avoiding development in Flood Zone 3 as shown by the graph opposite. 715 respondents strongly supported this approach with 339 also supporting. This means that 69.8% overall thought that development should not be located in Flood Zone 3.

185 respondents neither supported or objected and their reasons for this are set out under question 2c.

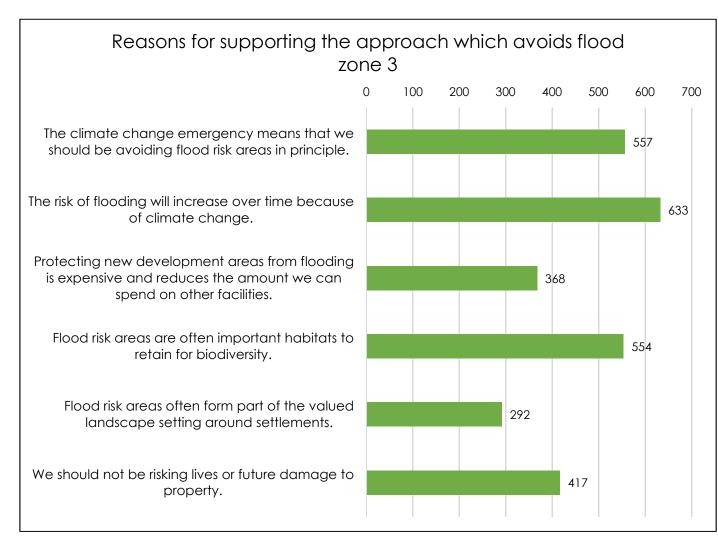
271 respondents objected either strongly or objected to avoiding development in flood risk areas meaning that 17.9% overall thought that development should take place in Flood Zones 3.



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Question 2a: Reasons for supporting the approach which avoids locating residential development in Flood Zone 3.

The chart below shows that out of the suggested reasons given in the questionnaire for supporting an approach that avoids development in Flood Zone 3, the most common reason (mentioned 633 times) was that the risk of flooding will only increase in time because of climate change. The climate change emergency (mentioned 557 times) and importance of habitats (mentioned 554 times), were also cited many times. Less referenced but still with 292 mentions is the contribution flood risk areas make to the landscape setting of settlements.



We also asked people what other reasons they may have for supporting this approach. **294 respondents added additional reasons or made further comments.**

There was a high degree of consistency in the reasons people gave for avoiding Flood Zones centering on the issues below.

A lot of concern was expressed over the high cost of building in flood risk areas. Not only the upfront higher build costs and maintenance, but also remediation costs when flooding occurs, cost or inability to get home insurance, emotional cost for residents whose properties flood or indeed the risk to life from flooding.

Another frequent concern was one of transferring problems elsewhere, whether it be future residents as a result of climate change and increase of flooding incidents, the impacts of flood mitigation in one area having consequential flood impacts elsewhere e.g. by raising land levels; removing trees and building on land which provides a natural soak away for water draining from higher ground.

Existing flooding/drainage problems were highlighted and the need to address these, especially at Churchill and around Nailsea. Issues included increasing the permeability in existing built areas, planting trees to soak up water and improving drainage and drainage maintenance.

The environmental benefits of flood risk areas were put forward not only as an important recreational and wildlife resource but also the role of Nature Recovery Networks and biodiversity net gain in tackling climate change and mitigating human impacts. There was also the suggestion that flood zones should be part of managed retreat.

The importance of the sequential test in decision making was emphasised and that the NPPF guidance should be strictly followed. Only small-scale exceptions should be considered and these shouldn't be the norm. Building on Green Belt land was seen as preferential to the liabilities of building on land liable to flood. In some locations it may be possible to build on part of the site with remediation and enhancement of the remainder.



Question 2b: Reasons for objecting to the approach which avoids locating residential development in Flood Zone 3.

Fewer respondents overall objected to the approach of avoiding development in Flood Zone 3 than supported it (651 as opposed to 1054). There was a degree of consistency to the top two reasons for this as shown in the chart below these being that flood risk areas in sustainable locations shouldn't be discounted (166) and that development is permissible in Flood Zone 3a subject to certain safeguards. The least mentioned reason with 60 mentions was that flood risk areas should be used before Green Belt.

We also asked people what other reasons Reasons for objecting to the approach that avoids flood they may have for objecting to this approach. 133 respondents added zone 3. additional reasons or made further 0 20 60 80 100 120 140 160 180 40 comments. There are plenty of good examples of new Many of the additional reasons given were in 78 developments being built in flood risk areas. fact an expansion of those cited above. Two common themes emerged. Firstly that The government allows residential development in where flooding can be mitigated or building 159 flood risk areas subject to certain safeguards. adaptations possible with development still viable as a result, then there should be no reason why it can't go ahead. This would be Flood risk areas in sustainable locations such as close to 166 towns should not be discounted. preferable to using sites in the Green Belt. There should not be a blanket ban, with each site being taken on its merits. Ignoring Innovative building designs can provide a solution - it the role of sea defences when considering 88 happens in other countries. flood risk is flawed and too theoretical. A strategic approach to flood alleviation was also mentioned using the example of the We should consider using flood risk areas before Green 60 Severn Tidal Barrage or other innovative Belt. measures which would also help Bristol, as well as large areas of North Somerset. The flood risk might be outweighed by other 100 considerations such as supporting regeneration. Allied to this, the point was made a number of times that placing a blanket ban on

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building in Flood Zone 3 would mean that

larger development would need to be imposed on villages outside Flood Zones, in order to meet housing targets. This would be damaging to the character of those villages. It was also contrary to national policy which makes a distinction between Flood Zone 3a and 3b. Development is allowed in 3a subject to the sequential test. National guidance also allows for the exception test where other suitable sustainable locations aren't available. NSC should apply a sequential approach and if necessary, the exception test, based upon the next stage of the SHLAA and a strategic flood risk assessment.

A second common theme concerned the importance of adequate water management systems/surface water drainage systems. These can have a positive effect in alleviating flooding by allowing upstream areas to flood naturally, utilise the run-off from new build development and infrastructure to support new habitats and wetlands and improve and enhance the proposed and surrounding sites. Property owners contribute to much localised surface water flooding by filling/culverting ditches or not maintaining them.

Building design to accommodate flood risk was cited as being important especially by moving the main living accommodation to the upper storeys in combination with other flood mitigation measures.

When considering building in flood zones the point was raised many times that this shouldn't include using pasture that forms a soak away for water draining from higher ground.

Question 2c: Further comments regarding the development of areas at risk of flooding.

There were **125 respondents who made further comments** about this question. A number of respondents were of the view that it was difficult to comment without specialist knowledge of the cost of building in flood zones and the technical possibilities.

Of the many who did respond however a clear priority was clearly resolving the issues of being able to get adequate household insurance in areas of flood risk and that fact that the sale price of properties in the flood plain should be commensurately reduced rather than increased. Otherwise affordability Issue sin North Somerset would be exacerbated.

The example of the Netherlands was commonly mentioned and that technology was developing all the time to mitigate against risk of flooding. Allied to this were the many comments that building in Flood Plains should only be allowed where the mitigation measures were guaranteed to be fail safe. There was also the suggestion that all properties should be constructed with flood risk in mind i.e. higher wall sockets, arrangement of living accommodation etc.

There was support for following the NPPF approach of the sequential test and if necessary the exceptions test, with each case being taken on it's merits, rather than a blanket ban imposed at local plan level.



It was suggested that there were circumstances where building in flood plains was preferable i.e. better than building in the Green Belt, or alternatively better than increasing the size yet again of villages outside the Green Belt which were already losing their character. There are also circumstances where building in the flood plan will help regeneration i.e. in town centres such as Clevedon and Weston.

The contribution of adequate surface water drainage was raised a number of times, especially the effect of development upstream on flooding downstream and the problem of building on areas used as soakaways for higher ground. The environmental benefits of good surface water drainage were also highlighted and the contribution this can make to green infrastructure. With good management of surface water drainage building in Flood Zones should be possible.



The Four Alternative Approaches

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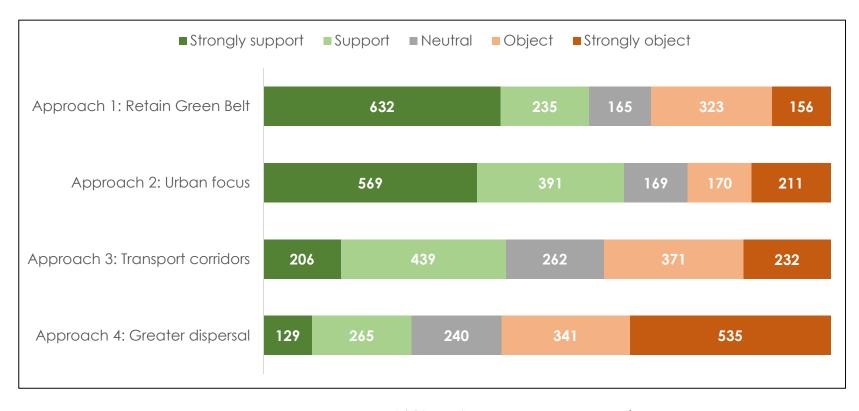
The Choices consultation presented four alternative approaches for identifying how the new growth could be delivered. These were:

Approach 1: Retain the Green Belt – This approach assumes that any new development areas are located outside of the Green Belt. Approach 2: Urban Focus - This approach seeks to maximise as much growth as possible close to the largest urban centres of Weston-super-Mare, Clevedon, Nailsea and Portishead and locations well related to the Bristol urban area.

Approach 3: Transport Corridors – This approach seeks to locate development on existing or enhanced public transport corridors where targeted growth locations (for both housing and employment) could be directly linked to transport investment, maximizing opportunities for sustainable travel choices.

Approach 4: Greater Dispersal – This approach assumes a broad spread of development across North Somerset, maximizing growth where there are opportunities to do so.

The chart below gives an overview of the results for the four approaches showing whether people supported or objected to these approaches. The detailed results are set out in the next section of the report.



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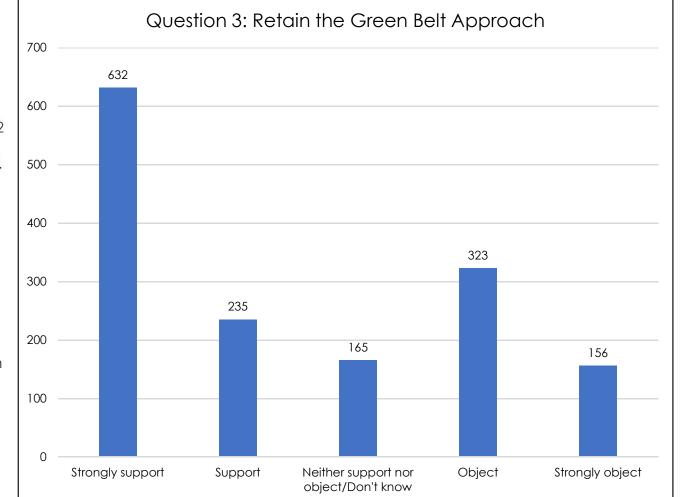
Question 3: Retain the Green Belt Approach

The first approach focused on retaining the Green Belt and assumes that any new development areas are located outside of the Green Belt.

The chart below shows that there was considerable support for this approach with 632 respondents strongly supporting this approach and 235 respondents supporting the approach. Therefore 57% of respondents supported this approach overall.

165 of respondents neither supported nor objected or didn't know and their comments are set out below under question 1c.

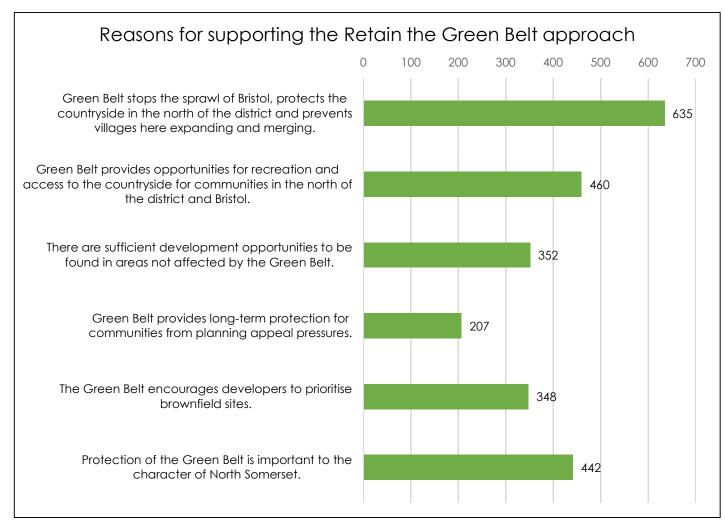
323 respondents objected to this approach and 156 respondents strongly objected to this approach so overall only 32% of respondents objected to a spatial strategy that would retain the Green Belt.



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Question 3a: Reasons for supporting the Retain the Green Belt Approach

The chart below shows that out of the suggested reasons given in the questionnaire for supporting an approach that retains the Green Belt a large number of respondents (635) felt that the role of the Green Belt was important to stop the sprawl of Bristol, protect the countryside in the north of the district and stop villages here expanding and merging. It was also felt that retaining the Green Belt was important as it provides opportunities for recreation and access to the countryside for communities in Bristol and in the north of the district with 460 respondents citing this reason. 422 people felt that protection of the Green Belt was important to the character of North Somerset.



288 respondents also put additional reasons or comments for why they supported this approach.

A number of respondents felt that the lockdowns experienced during the Covid-19 pandemic have illustrated how important green space and the ability to access the countryside is for peoples wellbeing. They felt that this option which retains the Green Belt reflects that and would mean that residents of Bristol and those living in the north of the district would still have access to open space for exercise and leisure. Others emphasised the importance of the Green Belt for wildlife and ecology.

Some respondents suggested that if all the disused and soon to be redundant offices and commercial premises were converted into housing then there wouldn't be the need to consider development in the Green Belt anyway.

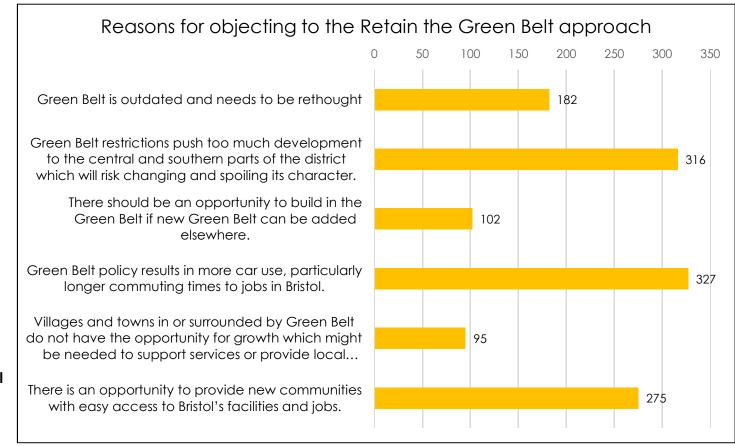
North Somerset in the start is the start in the start is Many respondents commented saying that once the Green Belt is built on it is lost forever, and there is a responsibility to future generations to protect it. Others expressed concern that allowing development in the Green Belt would impact on the character of the villages in the north of the district. Although some did mention that small scale development might be appropriate at some villages with an emphasis on good design and self-build properties.

However, there were a significant number of respondents who, although in principle opposed development in the Green Belt, did feel that if necessary there could be a release of land in the Green Belt at south west Bristol on the edge of the city, if it meant that the rest of the Green Belt was protected. There were also some suggestions with this approach that if Green Belt land was lost at south west Bristol the Green Belt should be extended elsewhere in the district.

Question 3b: Reasons for objecting to the Retain the Green Belt Approach

The chart shows that out of the suggested reasons given in the questionnaire for objecting to an approach that retains the Green Belt there were three main reasons people were not supportive of this approach. Firstly, 327 people felt that Green Belt policy results in more car use, particularly in terms of commuting to Bristol. Secondly, 316 people felt that Green Belt restrictions push too much development to the central and southern parts of the district which will risk changing and spoiling its character, and thirdly 275 people felt that there is an opportunity to provide new communities in the Green Belt within easy access of Bristol's facilities and jobs.

259 respondents also added additional comments or reasons as to why they objected to the Retain the Green Belt approach.



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A significant number of respondents felt villages in the south of the district such as Churchill, Langford, Congresbury, Sandford and parts of Wrington which are outside of the Green Belt had already taken more than their share of housing development. It was felt that Churchill and Langford have already accepted a 35% increase in number of houses in the past two years. This is the maximum that can be 'absorbed' without destroying the culture of village life.

Concern was also raised with this approach regarding the impact of more traffic and increased congestion in villages in the south of the district if development was focused there.

A number of respondents felt that exceptional circumstances did exist to develop in the Green Belt, and cited evidence presented at the West of England Joint Spatial Plan enquiry.

Lots of respondents felt that retaining the Green Belt was the least sustainable option and that by ruling it out the spatial strategy would result in an unsustainable pattern of development. It was felt that the Green Belt policy is out dated and needs to be reviewed and that the Green Belt is constraining the sustainable growth of Bristol and simply causing development to "leapfrog over miles of often lower-grade agricultural land to create dormitory suburbs located far away from services, public transport and places of employment".

A number of respondents suggested that an amendment to the Green Belt boundary could enable land adjoining the Mendip Hills AONB between Banwell and Blagdon to be protected in lieu of land taken out of protection on the south Bristol fringe, thus enhancing the AONB and protecting villages such as Churchill, Langford, Congresbury, Wrington and Sandford from further expansion.

Other comments were made about the need for Bristol to expand to prevent important green spaces and recreational land within the city from being lost to new development. It was also felt that communities close to Bristol, such as Long Ashton, Pill and Portishead, benefit from the employment, retail, leisure, and property prices of Bristol. They have existing services and facilities which can benefit and be enhanced by growing the existing community and providing existing residents with a wider choice of homes to better serve their requirements.

Question 3c: Further comments regarding the Retain the Green Belt approach.

135 respondents submitted further general comments about the Retain the Green Belt approach.

Many of the comments in this section mirrored those in the support and object sections. Some felt that the Green Belt should be considered a constraint just like other constraints such as the AONB, and the government should review their housing requirement based on how little land is available for development in North Somerset.



Some respondents were supportive of the principle of retaining the Green Belt but didn't support the indicative location showing 1500-3000 new homes between Churchill and Sandford due to concerns about the impact on the AONB.

Lots of respondents acknowledged that it was a difficult balancing act. They felt that they supported the principle of retaining the Green Belt, but not if it was at the expense of building on greenfield sites around villages and a less sustainable pattern of development. Due to this a significant number of respondents felt that allowing some development on the edge of Bristol in the Green Belt would be acceptable if it mean the retention and protection of the rest of the Green Belt. There were also suggestions for extending the Green Belt around Churchill, Sandford and Winscombe, Yatton and around Nailsea.



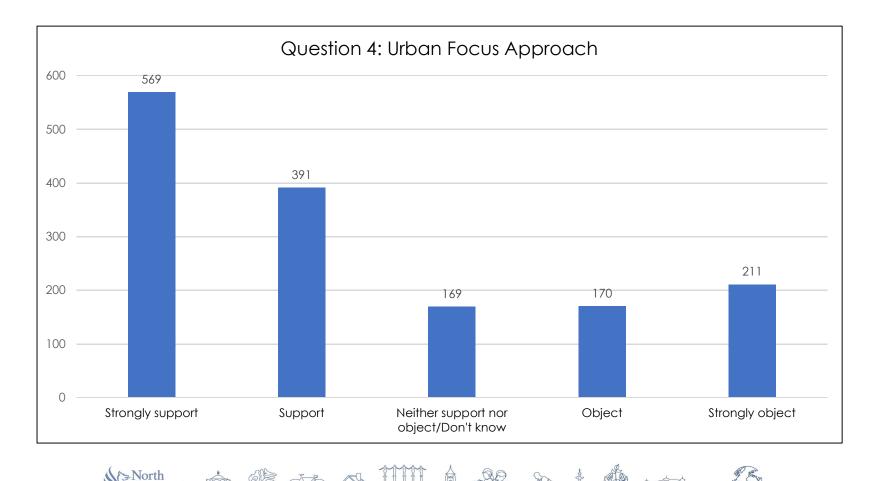
Question 4: Urban Focus

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The Urban Focus approach seeks to maximise as much growth as possible close to the largest urban centres of Weston-super-Mare, Clevedon, Nailsea, Portishead and Bristol where there are already a good range of services, facilities and jobs. This approach had the most overall support out of all the proposed approaches. 569 respondents strongly supported this approach and 391 respondents supported the approach. This means that 64% overall though this was the best approach as to where to locate new development.

169 respondents neither supported nor objected to this approach and a summary of their further comments are set out below.

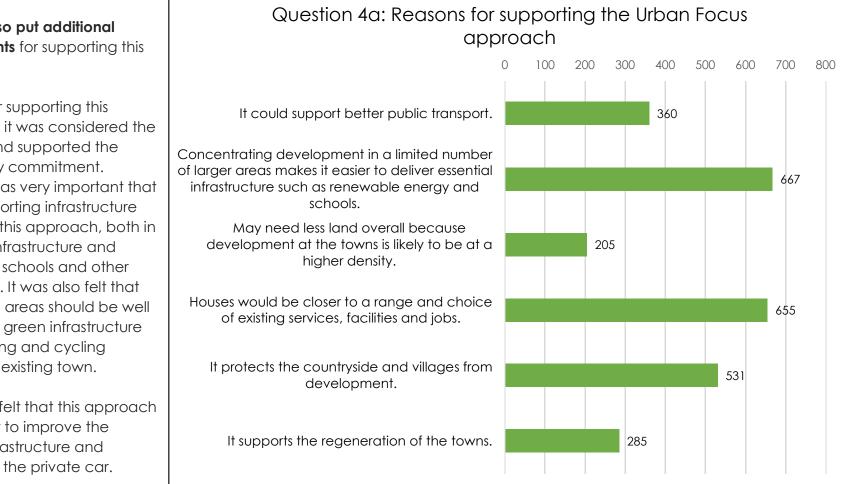
Overall 479 respondents objected to the Urban Focus approach (211 strongly objected and 170 objected) meaning that 25% overall disagreed with this approach.



Question 4a: Reasons for supporting the Urban Focus approach.

The chart below shows that out of the suggested reasons given in the questionnaire for supporting the Urban Focus approach, the most popular reason, with 667 people selecting it, was because concentrating development in a limited number of large areas makes it easier to deliver essential infrastructure. This reason was closely followed, with 655 people choosing it, by the fact that locating housing near existing urban areas means they are closer to a range and choice of existing services, facilities and jobs.

Another common reason citied, with 531 respondents choosing it, was because the Urban Focus approach protects the countryside and villages from development.



343 respondents also put additional reasons or comments for supporting this approach.

The main reason for supporting this approach was that it was considered the most sustainable and supported the Climate Emergency commitment. People felt that it was very important that the necessary supporting infrastructure was delivered with this approach, both in terms of transport infrastructure and renewable energy, schools and other social infrastructure. It was also felt that extensions to urban areas should be well planned with good green infrastructure networks and walking and cycling connections to the existing town.

Many respondents felt that this approach provided the ability to improve the public transport infrastructure and reduce reliance on the private car.

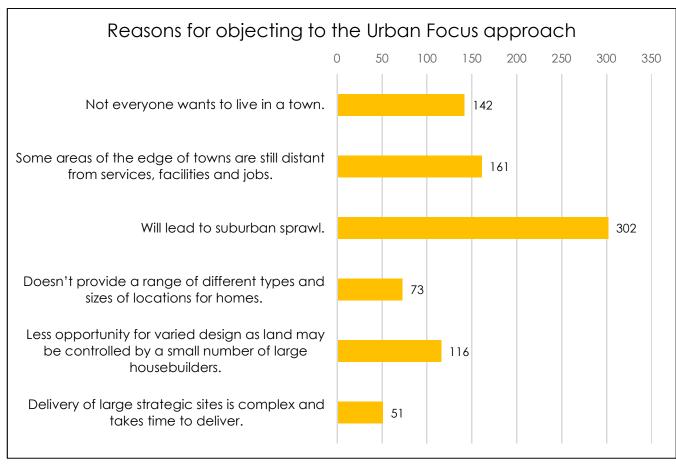
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However, many respondents also recognised that much more investment in public transport was needed in order to encourage people to use it.

People supported this approach as they felt it located jobs near to homes and other services and facilities, and protected the countryside and villages from over-development. It was also felt that due to the quantum of development in each location this approach could provide a broader mix of housing types, sizes and tenures and therefore deliver more affordable housing. Some respondents felt that towns such as Nailsea and Clevedon needed new homes to rebalance the age demographic of those places which are have an increasingly older population.



Question 4b: Reasons for objecting to the Urban Focus approach.



The chart shows that out of the suggested reasons given in the questionnaire for objecting to the Urban Focus approach, the most common reason given was the worry that it would lead to suburban sprawl with 302 giving this as a reason. 161 respondents were also concerned that areas on the edge of towns are still quite some distance from the services and facilities within the town therefore potentially making them difficult to access and 142 people felt that not everyone lives in a town and this approach doesn't recognise that fact.

195 respondents also put additional reasons or comments for objecting to this approach.

Many respondents objected to the proposed large numbers of dwellings in the Green Belt at SW Bristol in this approach in terms of the loss of countryside and wildlife, the potential merger with Long Ashton, and impacts to other villages in the Green

Belt such as increased traffic and potentially ruining their character. Many respondents felt that the Green Belt should be protected.

Many respondents were concerned that the Urban Focus approach would lead to bland housing estates bolted onto the edge of towns in the district without having proper connections to the main town. Like with the responses to the question regarding prioritising brownfield land many respondents were concerned about the impact large strategic housing sites at the towns would have on the already stretched services and facilities in these towns.

Some respondents raised concerns over delivery of such large housing sites within the plan period and whether the essential infrastructure would be delivered alongside the housing. They felt that a range of different sized sites across the district would be more deliverable.

Some respondents felt that Portishead has had its share of house building and that it can't accommodate any more housing growth, but that it did need some more employment. The need for employment opportunities at the towns was raised more generally, particularly if there was going to be a lot more housing as proposed under this approach.

Some respondents commented on the change in working patterns since the start of the Covid-19 pandemic and felt that as many more people were working from home, and would be into the future, then it wasn't so important to focus on access to public transport and commuting. They also felt that as many more people would be working from home, and distance to the work place would not be an issue, people might prefer to live in rural areas rather than towns.

Many respondents raised concerns about the impact on the road network by focusing growth at towns. Particular examples given were coming out of Weston-super-Mare onto Junction 21, the road network in and out of Nailsea which many people felt would not be able to cope with the increased traffic from large amounts of new housing, traffic in and out of Portishead onto the M5, as well as the impact on the Cumberland Basin and traffic in and out of Bristol.

Question 4c: Further comments regarding the Urban Focus approach.

109 respondents made additional comments regarding the Urban Focus approach. Many of the comments made were similar to those above supporting and objecting to the approach.

Overall there was general consensus that this approach would deliver the most sustainable pattern of development but again people raised concern about the proposed housing in the Green Belt at South West Bristol, particularly the amount of housing proposed and the impact it would have on the character of that part of the district. For that reason, quite a few respondents stated that they had mixed feelings about this approach.

However, some respondents thought that putting housing at SW Bristol was the most sustainable option and felt that if the rest of the Green Belt was enhanced and/or the Green Belt was extended to other parts of the district that would be a suitable compromise.

A number of respondents made comments on the need to provide employment as well as housing at the urban areas, and again the issue of the impact on existing services was raised. Some respondents felt that existing infrastructure was at capacity and the towns were already overcrowded. They felt that more housing would make this situation worse.



The issue of transport and impact on the road network was frequently citied as a concern both in and out of towns and on the villages, such as Tickenham located near to the towns and urban areas.

Some respondent raised issues about flooding and a concern that the area East of Weston-super-Mare near junction 21 of the M5 is a flood risk area.

Some respondents felt that it should not be a binary choice between urban or rural locations but that there should be a split between urban and non-urban areas. It was felt this would give a better mix of housing sites and sizes and mean that housing would be delivered more quickly, rather than waiting for large sites to come forward.

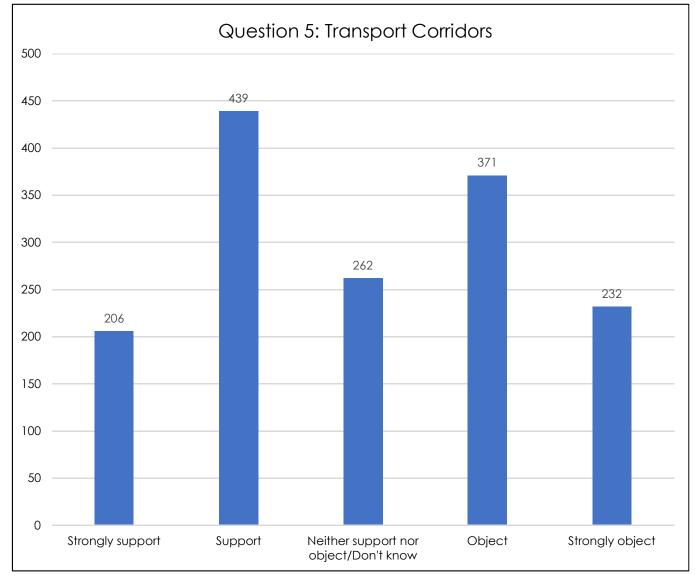
A number of respondents raised the issue of density and how much land would be needed. Higher densities mean less land, but may not provide the amount of out door space, gardens etc that people want. There is a big difference in land-take between family houses with gardens and high density apartments.



Question 5: Transport Corridor Approach

The Transport Corridor approach focuses on existing or enhanced public transport corridors where growth locations (for both housing and employment) could be directly linked to transport investment and so maximise opportunities for walking, cycling or public transport.

The graph suggests that respondents had conflicting views regarding this approach, with 43% supporting the principle against 40% objecting to it, while 17% having a neutral view.

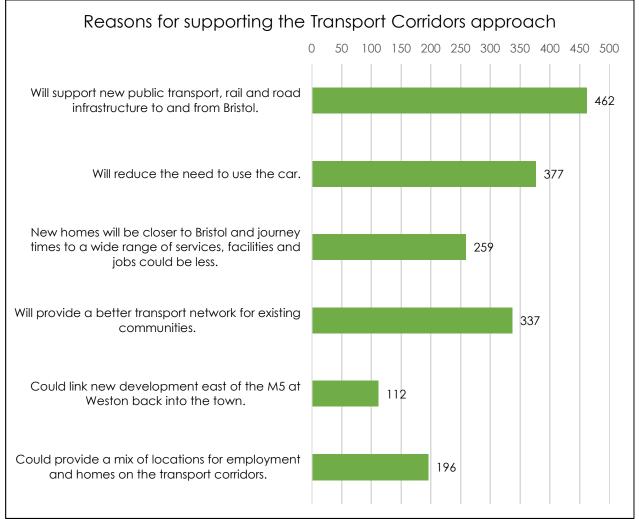


North Somerset in the set of the

As shown in the first graph, 645 respondents were in favour of Transport Corridors, with 209 **strongly** supporting it.

The chart shows that out of the suggested reasons given in the questionnaire for supporting Transport Corridors, the most common reason was that it would support public transport, rail, road infrastructure to and from Bristol (mentioned 462 times), followed by the suggestion that it would reduce car reliance (mentioned 377 times) and that it would provide a better transport network for existing communities (selected by 337 respondents). It was also supported on the grounds that new homes would be closer to Bristol and journey times to a wide range of services, facilities and jobs would be less (mentioned 259 times). Finally, 196 respondents suggested that it could provide a mix of locations for employment and homes on transport corridors, whilst fewer respondents (112) believed that it would link new developments east of the M5 at Weston back into the town.

243 respondents provided further comments about why they supported this approach



Most respondents were supportive of the principle of the Transport Corridors approach on the basis that future housing growth in the district should be directed in accessible locations, offering multiple transport options and emphasising sustainable transport. That is, housing growth



should be directed to locations which are close to key transport nodes and public transport routes to assist in achieving a great reduction in car reliance and long distance commuting, thereby reducing carbon emissions, addressing sustainability objectives and complying with the principles set out in the Council's Climate Emergency Declaration.

Further, support was offered on the grounds that this approach assumes that future development would take place upon existing patterns of development, maximising opportunities to generate a critical mass and enable the delivery of public infrastructure improvements where most needed.

A significant number of comments focused on the role that this approach could play as an 'enabler' of much sought after public transport and road infrastructure improvements, which are considered necessary to address existing high levels of congestion. Further, it was suggested that such improvements should be integral to planning from the outset. It was also highlighted that additional housing should only be delivered at locations which are already well served by public transport or adequate road infrastructure and doesn't rely on future provision whose delivery is uncertain. Many respondents referred to specific improvements that need to be considered if such an approach were put forward, including the following:

- Railway infrastructure, roads and cycle paths should be upgraded to be fit for commuting purposes. The Nailsea/Backwell and Yatton rail stations should be extended and the cycle path serving Long Ashton and bus connections to Bristol should be improved;
- A370, A369, A38 are all highly congested;
- Whilst broad support was expressed with regard to the delivery of the Portishead Branch Line, concerns were raised over the deliverability and viability of the project as a result of COVID-19 impact on remote working. Respondents also raised that allocating sites around Portishead might not be justifiable as the reopening of the line hasn't been delivered yet. Finally, new rail stations serving Ashton Vale, Pill and Portishead were supported.
- Metrobus improvements were proposed to link the main towns.
- Public Transport interchanges were proposed at Portishead station, Clevedon Town Centre, Bristol Airport, Worle Railway Station, and Weston Super Mare Railway station.
- New Park and Ride was proposed at Weston Super Mare.
- Banwell Bypass was broadly supported along with a new rapid route to Bristol Airport through Churchill.

Despite the broad support of its principle, there were conflicting ideas with regard to the impact that the approach would have on the Green Belt. Some respondents strongly supported the approach by stating their preference for identifying sustainable locations close to



employment opportunities near Bristol subject to careful release of Green Belt land, whilst others were very concerned that the Green Belt harm would be significant. Other respondents had reservations about the risks associated with this approach, in terms of urban sprawl and ribbon development, which need to be addressed.

A few respondents supported elements of all the approaches including the Transport Corridors. It was argued that this approach could be complimentary to other alternative approaches, such as the Urban Focus, in order to address issues of deliverability and help spread development around the district in the most sustainable way. When looking to deliver development away from the key urban centres of Bristol and Weston, priority should be given to sites with good access to services, facilities and employment opportunities

Respondents also wished to comment on specific locations and elements included in the approach, including the following:

- Regarding South West Bristol, many respondents supported the principle of housing development in South West Bristol. Others were concerned that areas close to Bristol will be under significant pressure based on the existing high levels of congestion.
- Subject to flood constraints and transport improvements, there was support for development close to Junction 21 and along the A370 Weston Super Mare to Bristol corridor.
- It was mentioned that there was no sufficient capacity at junctions in Backwell and Congresbury or near Flax Bourton;
- Pill-Easton in Gordano and Ham Green: Whilst there were concerns over existing high levels of congestion on A369 corridor, respondents suggested that limited development around these settlements might be acceptable.
- It was mentioned that a garden village should be identified near Churchill and put forward as a non-Green Belt and sustainable option;
- Most respondents were not supportive of Bristol Airport expansion.



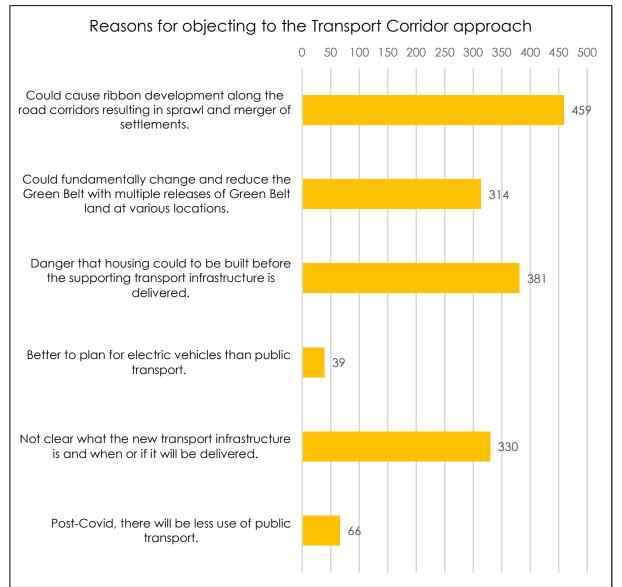
As aforementioned, 603 respondents opposed the Transport Corridors approach, of which 232 were **strongly** objecting.

As shown in the graph above, most respondents felt that the approach would cause ribbon development along the road corridors resulting in sprawl and merger of settlements (mentioned 459), whilst others objected due to the risk involved that housing would be built before the supporting transport infrastructure was delivered (mentioned 381 times).

330 respondents felt that it was not clear what the new transport infrastructure is and when or if it will be delivered, whilst 314 objections were submitted on the basis that it could fundamentally change and reduce the Green Belt with multiple releases of Green Belt land at various locations. Finally, fewer respondents believed that there will be less use of public transport post-Covid-19 (mentioned 66 times) or that it would be wiser to plan for electric vehicles than public transport (selected 39 times)

259 respondents offered additional comments to explain their opposition to this approach under Question 5b.

Concern was expressed by most respondents regarding whether infrastructure delivery would



North Somerset in the sea of the come forward prior to the delivery of new residential development or about whether existing and future transport infrastructure would be sufficient to support future housing growth without causing significant congestion on the road and public transport system. Respondents specifically referred to Banwell Bypass and Portishead Branch line. There was overall consensus that existing road and public transport infrastructure is over capacity, requiring significant improvements. In addition, respondents felt that potential future changes in commuting and work patterns along with associated impacts arising from the Covid-19 crisis should be fully understood and taken into account in the assumptions underpinning this approach. The approach was also not supported on sustainability grounds, as some respondents stressed that it would not challenge current commuting patterns, encouraging people to keep using their cars thereby compromising the Active Travel Strategy.

Most respondents felt that any benefits accrued from this approach would be outweighed by encouraging patterns of urban sprawl and the loss of Green Belt. Concerns were raised regarding its impact over nature, valued habitats and biodiversity, valued landscapes, protected agricultural land, green space, the setting of heritage assets, and increased air, light and sound pollution in the countryside. Specific concerns were raised with regard to the urbanising effect that the approach would have by means of allowing 'soulless' suburban type developments encroaching into the countryside.

Respondents opposed development in specific locations:

- Ashton Vale: Many objected to the location on the basis that it would add to existing congestion issues identified on the edge of Bristol (A370 and A38) and due to resulting in the loss of Green Belt, agricultural land, green space and merging with Bristol;
- Long Ashton: Objections raised as it was felt the village is over capacity in terms of road infrastructure and facilities and further development will only worsen congestion and traffic to Bristol;
- Nailsea: It was felt that road capacity on A370 to Bristol is very limited to support the proposed quantum of growth and therefore, no further development should be proposed unless significant road infrastructure improvements are delivered. This is because it was assumed that the car will remain the preferred travel option in the future. It was felt that Nailsea/Backwell station also requires significant improvement before being considered as a future transport hub. Finally, most respondents referring to Nailsea stated their concerns over the environmental and visual impact that a large allocation would have to the north east of Nailsea in addition to being away from the train station;
- A370, A369 and A38 are already significantly overloaded during commuting hours;
- Pill: Adverse impact on sensitive landscapes;
- Banwell: if large scale development is allocated in Banwell then traffic towards Churchill will increase;
- New link between the M5 J20 and Bristol is needed and better transport between Weston and Bristol;
- It is unlikely that Portishead Branch Line will support a significant number of passengers;
- Small developments in villages along transport corridors would encourage commuting through other communities which will be highly affected such as Abbots Leigh, Flax Bourton and Tickenham;



- B3128 represents the most direct route between Clevedon-M5-Nailsea and Bristol avoiding the over congestion of the A370 and A38 and is therefore a significant alternative for sustainable development.
- Strategic Employment Allocations: respondents referring to these sites stated their opposition to the expansion of Bristol Airport, due to its climate change impact, as well as to the Port's expansion, which would be unjustified in the post-Brexit era. However, improvements to public transport links to both sites are sought.

Question 5c: Further comments regarding the Transport Corridor approach

164 comments were received in response to Question 5c. A number of respondents were of the view that it was difficult to comment without having sufficient information before them about the impact that approach would have on existing transport corridors and how this will be mitigated, as well as about the ways that sustainable travel will be facilitated in practice. Most respondents reiterated issues and views offered above.

Many respondents were supportive of the principle of identifying potential growth areas located on existing or enhanced public transport corridors where targeted growth locations could be linked to transport investment. However, it was acknowledged that the amount of growth would be reliant on significant targeted public transport investment. Others emphasised on the importance that good transport links should be already in place or if funding for the necessary transport upgrades is secured. Some respondents felt that developing around motorway junctions (Junction 21 and Junction 20) was reasonable, whereas others prioritised areas close to public transport, such as railway stations. It was also mentioned that sustainable transport must be supported. Respondents were also supportive of the approach as long as Green Belt loss is kept to minimal.

Respondents reiterated their belief that existing transport infrastructure does not have the capacity to support a significant increase in the use of public transport. In addition, it was felt that the main road transport corridors operate at capacity. There were concerns that assumptions made under this approach fail to fully consider the post Covid-19 trends in the use of public transport, commuting and work patterns which are likely to impact on the use of transport corridors. Finally, it was considered by some respondents that the approach was over-reliant on the assumption that public transport would be the main mode of transport, which is uncertain, whilst it was thought that mass transit would not be delivered before 2038.

The approach was also opposed by respondents due to its potential impact on Green Belt, the AONB and other sensitive landscapes, as well as ecology. It was also opposed due to its potential incompatibility with the Climate Emergency declaration, in terms of its reliance on road corridors.

Again, specific reference was made to existing transport corridors, which were all considered to be busy and incapable of supporting further growth (A369, A370). Some respondents felt that A38 had more capacity than other roads to support some limited growth close to



existing small settlements to the south of the district. Development on north east Nailsea was strongly opposed by many respondents on the basis of its inadequate road access and infrastructure, added traffic through Tickenham, distance from the rail station, impact on landscape and sensitive habitats. Others felt that the amount of housing growth proposed in Backwell was inappropriate based on its size. Development in Ashton Vale was also opposed by some respondents. Most respondents referring to Bristol Airport opposed expansion scenarios, focusing on the need to improve public transport links to main settlements.

Finally, a few respondents emphasised that the most important consideration for allocating housing growth should be its proximity to local employment and necessary facilities. There were suggestions for supporting hybrid scenarios, involving both the Urban focus and the Greater Dispersal.



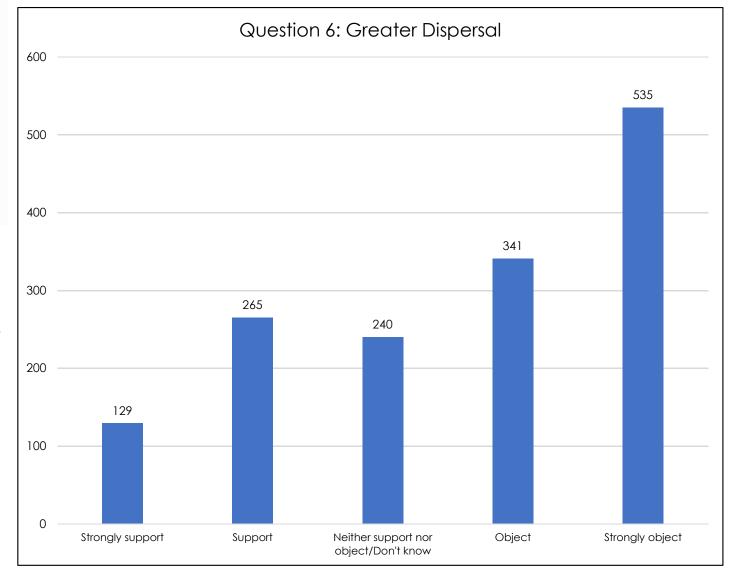
Question 6: Greater Dispersal Approach

The Greater Dispersal approach assumes a broad spread of development across North Somerset, maximising growth where there are opportunities to do so. It assumes a much more even spread of the growth across all communities and avoids focussing growth at fewer large strategic sites. This approach means that many more communities would see new homes built in their areas.

The graph opposite shows that most respondents did not favour the proposed approach, with 535 respondents strongly objecting and 341 objecting. This means overall 58% of the respondents objected to the Greater Dispersal approach.

In terms of support, 129 respondents strongly supported this approach and 265 supported meaning overall 26% of people supported this approach.

240 respondents (16%) gave a neutral response.





Question 6a: Reasons for supporting the Greater Dispersal Approach.

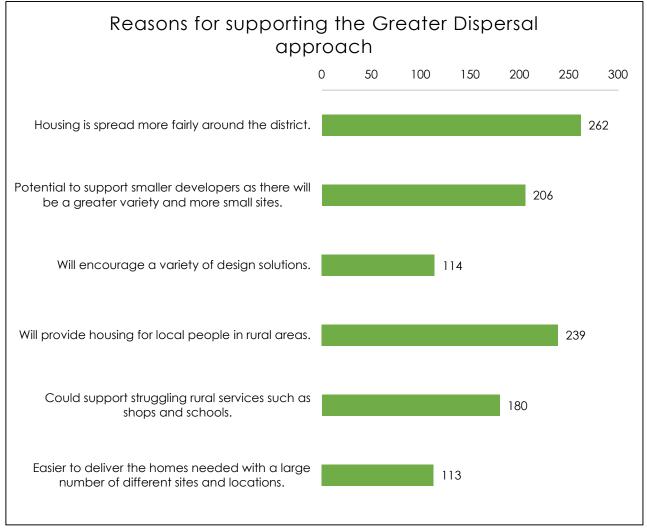
As shown in the first graph, 394 respondents were in favour of the Greater Dispersal approach, with 129 strongly supporting.

The chart shows that of the suggested reasons given in the questionnaire for supporting Greater Dispersal, the most common reason (mentioned 262 times) was that it would enable housing growth to spread more fairly across the district, followed by the suggestion that it would help serve the housing needs in rural communities (selected by 239 respondents). It was also felt that the approach would offer the potential to support smaller developers, as there will be a greater variety and more small sites (mentioned 206 times) and that it could support struggling rural services, such as schools and shops (mentioned 180 times). Finally, many respondents (114) suggested that it would encourage a variety of design solutions and that it would facilitate the delivery of much sought after housing as a large number of different sites could be brought forward (113).

172 respondents offered additional comments

in response to Question 6a. There was a significant degree of consistency in the reasons people gave for supporting Greater Dispersal approach.

Most respondents felt that this approach would



provide a more even and fairer approach to housing delivery, which could spread across all or many villages and settlements providing

flexibility and facilitating delivery at faster pace compared to large strategic sites. The majority of respondents were in favour of putting forward a wide range and large number of sites across the district in sustainable locations, which would have a positive effect to the affordability of housing in North Somerset, the quality of housing and with greater ability to address housing needs in rural areas.

In addition, it was considered that the approach would help minimise adverse impacts on specific settlements and enable the delivery of housing at the right scale and character around existing villages and towns. It was felt that the allocation of housing sites in many settlements would improve the vitality of small communities, by supporting existing shops, businesses and community activities or creating new ones, being more attractive places for families and younger people to live in. Some respondents assumed that the approach would be favoured by ongoing trends for remote working and online shopping in the post-COVID-19 world, further supporting this approach. Finally, the approach was seen as the real alternative to strategic large allocations and mass building developments, which would support local employment and smaller builders.

Other comments brought forward significant constraints identified in other approaches to conclude that Greater Dispersal should be supported. For instance, it was argued that a sequential approach is necessary to be undertaken before any Green Belt release is allowed, prioritising sites outside the Green Belt, such as the ones promoted under this approach. Also, Weston was considered by many respondents to be heavily constrained in delivering additional growth and therefore, dispersal will help with the delivery of housing.

Reference was made to specific locations. Yatton was considered very sustainable for accommodating additional growth. Whilst some respondents supported development in the Banwell- Sandford- Churchill area, there were also objections to this location due to the lack of good transport services or adequate facilities. Other locations supported included Long Ashton, Nailsea, Backwell, Failand, Flax Bourton, south east of Clevedon, Hutton, Locking, and others along the A38 to the Airport, as well as the A369

A great proportion of respondents considered this approach positively only if it was complimentary to another approach, such as the Urban Focus, or Retain Green Belt, to assist in the delivery of housing required and without adversely affecting the character of the countryside and rural settlements, or the Green Belt.

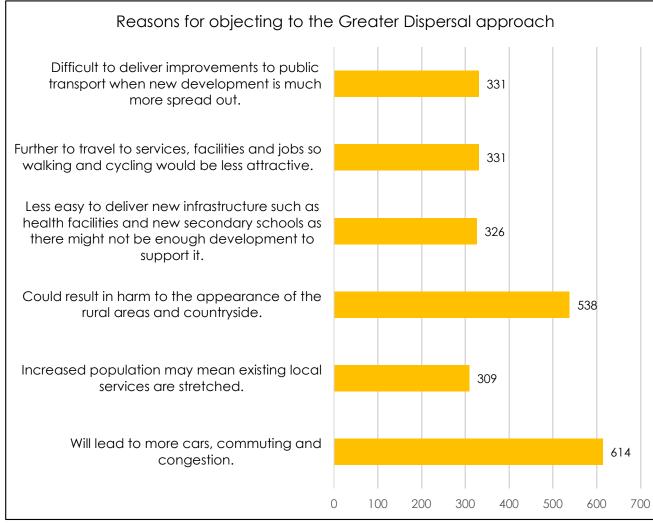
In any case, this scenario was supported only subject to significant improvements being delivered in the transport system and the public transport services between small settlements and towns, along with the active promotion of walking and cycling to reduce traffic on the road network along with the creation of transport hubs.

Finally, several respondents referring to employment allocations were not in favour of Bristol Airport or Port expansion and emphasised the need to attract high skilled jobs. Others saw the Airport site as an opportunity to attract high quality and technology oriented jobs.



Question 6b: Reasons for objecting to the Greater Dispersal Approach

As aforementioned, 876 respondents opposed to the Greater Dispersal approach, of which 535 were strongly objecting.



objection to the Greater Dispersal.

Most respondents (614) felt that the approach would exacerbate existing issues involving traffic, commuting and congestion, whilst others (538 people) suggested that it would have a harmful effect to the appearance of rural villages and the countryside.

Specifically, 331 respondents objected to the approach on the basis that it would be difficult to deliver improvements to public transport to support dispersed housing and that it would make walking and cycling less attractive. A further 326 respondents felt that a dispersed housing strategy would not facilitate the delivery of new infrastructure, such as health and school facilities. Finally, 309 respondents claimed that the allocation of further growth in the countryside would overstretch existing local services.

339 respondents provided comments in

response to Question 6b. Most respondents wished to reiterate their agreement with all or most reasons suggested by the Council under Question 6b for justifying their



Some respondents suggested that this approach should not be brought forward, as it would be highly predicated on meeting the housing requirement, while being detached from the local needs for housing and other facilities, such as medical centres, schools, post offices and retail/hospitality.

Many respondents suggested that the approach would represent a missed opportunity for the Council to pursue a more holistic strategic approach to planning in order to meet the local needs and would allow developers to bring forward speculative proposals in unsustainable locations.

Other respondents justified their objection not on the basis of the principle of dispersed housing growth, but due to disagreeing with the selection of locations or the proposed scale of allocations in specific locations. Others felt that the approach could only be considered as part of a hybrid spatial scenario.

The most common reasons offered by respondents for objecting to the approach are set out below:

- It would be harmful for the natural environment, protected habitats and wildlife;
- It contradicts sustainability objectives and is contrary to the Climate Emergency declaration made by the Council;
- It would not assist in reducing car reliance and help meet the Council's objective to reduce carbon emissions;
- It would facilitate urban sprawl, promoting inappropriate development to be put forward in an unplanned manner;
- It would erode the rural character and appearance of small settlements, which would look more like overbuilt suburban sprawl, rather than countryside.
- It would be harmful to the landscape;
- Adverse impact on the setting of the Mendip Hills AONB;
- Detrimental impact on the Green Belt, including the Green Belt settlements
- The model of dispersed allocations would not be able to support the delivery of necessary transport infrastructure improvements or projects and will put extreme pressure to the existing poor transport corridors by adding to congestion. For the same reasons, it was claimed that it would not support a transformative change in travel habits being unable to support the delivery of mass public transport.

Many respondents claimed that it would lead to excessive development, which would put additional strain to already overstretched transport infrastructure and other facilities. On these grounds, respondents opposed the allocation of growth in several locations including the following:



- Congresbury, Langford, Churchill and Sandford, which are considered to be unsustainable locations and inaccessible compared to areas closer to Bristol
- Long Ashton. The objections were based either on the principle of extending the boundary, due to the associated Green Belt harm and the lack of adequate facilities to support the expansion, or due to the proposed scale of allocations, which would have a detrimental impact on the character of the village.
- Yatton as it did not have the same level of services and facilities as the main towns;
- Wrington, due to poor access roads;
- South-West Bristol, which would put an excessive strain to the road network (A38) and because there is a risk of merging with Bristol;
- Dundry, due to access issues and remote location;
- Pill, as the proposed scale would put pressure on existing services and roads and would be contrary to the Neighbourhood Plan which is currently being prepared;
- Regarding Bristol Airport, there were comments objecting to further expansion which would bring low quality employment, whilst its future is uncertain post Covid-19.
- A few respondents emphasised the need to protect agricultural land.

Drawing on recent experience during the Covid-19 crisis, it was suggested that there will be many opportunities to repurpose empty commercial spaces to housing in more sustainable locations within the main towns, rather than dispersing housing growth in less sustainable locations in the countryside.

Question 6c: Further comments regarding the Greater Dispersal approach

136 respondents chose to offer additional comments regarding Greater Dispersal. Many respondents wished to reiterate points raised under previous questions.

A number of respondents felt that they couldn't provide a clear response addressing this approach, having insufficient details before them about the scale of the proposed housing allocations and locations to understand its impact on rural communities.

Whilst the positive contribution of limited development in rural settlements in sustainable and well-serviced locations was acknowledged by most respondents, it was outweighed by serious concerns that this approach would result in an unsustainable pattern of growth leading to a wider distribution of adverse impacts on the natural environment, ancient woodland, national and international designated sites, the Mendip Hills AONB, the erosion of rural character and the rural appearance of many settlements.

Again, whilst it was suggested that subject to appropriate scales, Greater Dispersal would be beneficial in avoiding placing undue strain on a number of areas, but by spreading housing across the district it would be a challenging strategy to focus resources on delivering the necessary transport infrastructure improvements or other necessary facilities and wouldn't necessarily improve facilities in the area.



Many comments concurred with the idea that growth should be directed and concentrated close to the main urban areas of Bristol and Weston Super Mare, where there is employment and other necessary facilities. The underlying principles of this choice involved commitment to sustainability principles and reducing carbon emissions, protection of the countryside from urban sprawl, and protection of biodiversity which are in line with the principles set out in the Council's declaration of a climate and ecological emergency. Additionally, the protection of Green Belt was strongly supported as the overriding reason for rejecting the approach.

However, Greater Dispersal was supported by significant number of respondents as complimentary to other approaches, such as the Urban Focus, Transport Corridors or as part of other alternative hybrid scenarios, as an element offering flexibility to the spatial strategy, if carefully considered and implemented.

Other respondents objected to specific locations for this strategy such as Churchill, Yatton, Dundry, Ashton Vale, other areas close to Bristol and Weston, Portishead, Nailsea, Banwell.

There were conflicting views between Bristol Airport Limited, which was in favour of the airport's expansion and other respondents, who opposed it on the basis of the Council's declaration of Climate Emergency and potential harm to the Green Belt.



Question 7 and 7a: Do you have any other suggestions for alternative approaches?

Following the presentation of the four approaches, people were asked whether they wanted to produce their own alternative approach, which could better reflect their ideal spatial strategy scenario. Question 7 was addressed to respondents wishing to provide a visual representation of their suggestions (map), while Question 7a gave the option to provide a description. Responses given to either part of this question are considered equally important.

Overall, 564 people answered this question, of which 8 covered only the Question 7. In terms of visual representations, we received only 11 maps suggesting alternative approaches (see Appendix 1) and 5 site promotions under Question 7, whereas the rest of the responses were offered as comments under Question 7a.

Many different answers were provided by respondents, which all had the delivery of sustainable development as the underlying principle. Most respondents presented an alternative hybrid scenario based on a combination of the four approaches offered. The most popular hybrid scenario involved alternatives to the Urban Focus together with the Transport Corridors approach. Some suggestions around this hybrid included:

- Development of brownfield sites to provide mixed use schemes of high density within the existing settlements in order to minimise car reliance and increase use of public transport combined with enhanced walking/cycling infrastructure linking to other settlements. Regeneration and renewal of existing towns and high streets, and particularly Weston-super-Mare was put forward as priority.
- Most responses involved the careful review of Green Belt land to allow the allocation of housing growth in South West Bristol, which is considered to be an accessible and sustainable location, due to proximity to employment areas in Bristol and access to public transport routes, including a potential mass transit corridor to the Airport, as well as the expansion of Weston-super-Mare. There were conflicting ideas about whether allocating strategic growth on the land east of the M5 in Weston-Super-Mare close to the Banwell Bypass is a realistic strategy considering issues of congestion experienced at Junction 21.
- Most respondents drawing on such an alternative approach suggested that developing around villages would detract from sustainable development, unless these villages are well served with facilities and mainly, well connected to key settlements (Long Ashton) or have a railway station (Backwell, Yatton) and therefore, they could accommodate limited growth.
- A 'Northern Corridor' was proposed, suggesting development in the area of Portishead, Portbury, Pill/Easton in Gordano and Abbots Leigh. In addition, Weston (Yatton, Claverton, Backwell, Flax Bourton, Long Ashton) and Airport Corridors (Dundry, Felton, Wrington) were also considered to be capable of providing development in sustainable locations.
- There were conflicting ideas over allocating strategic growth around Nailsea. Respondents suggested that areas north of Nailsea or close to the railway station towards Backwell are well placed to accommodate growth, whereas others stressed Nailsea lacks adequate road access and transport infrastructure to support this level of growth.
- Most respondents did not promote growth around Clevedon, but there were very few opinions in support of development to the east of J20.



A few respondents highlighted the benefits of developing a hybrid alternative based on the Greater Dispersal approach. Greater dispersal was promoted as a means to support existing and successful rural businesses and enhance the vitality of existing villages, which might need some proportionate level of development to be allocated to them. The underlying principle behind these alternatives involves the promotion of a balanced approach to allocating growth, which could be realistically delivered in smaller sites across the district and would simultaneously promote urban renewal. Other respondents believed that locations promoted within the Greater Dispersal approach, such as Churchill, Sandford and Winscombe, should be considered before pursuing a Green Belt review.

Finally, the protection of the Green Belt under the first approach was also considered important to some respondents, who selected it as part of a hybrid alternative. People focused on the protection of countryside and sensitive landscapes within the Green Belt and suggested any review of its boundaries should either be rejected as an option, or be limited and concentrated in very sustainable locations close to Bristol or away from it close to its southern edge to preserve its openness. Again, the main principle behind promoting this approach seems to be the focus on urban renewal and delivery of growth close to Weston or other rural communities in the south of the district.

Some topics covered involve the following:

- Promotion of 'bottom-up' planning, challenging the Government's housing requirement: Many respondents highlighted as priority the challenge of the housing requirement set by the Government, in anticipation of producing a local housing figure reflecting the actual local needs. It was suggested that the housing requirement for North Somerset should be proportionate, considering the numerous planning constraints, and adjusted to the current unprecedented circumstances arising from the Climate Emergency, Brexit and the Covid-19 crisis. Finally, in several instances, respondents believed that the Council should collaborate with neighbouring authorities, which could help deliver part of the housing requirement.
- Improvement of transport infrastructure: In most responses, it was stressed that any future development should be infrastructure-led, suggesting that the existing level and quality of infrastructure will not assist the delivery of further growth. Respondents suggested that a number of road improvements should be put forward (new road to Bristol, new junctions on M5, new link roads between towns and the M5 or the Airport, improved road connection between Portishead and Clevedon), as well as the development of an improved cycling network linking the main towns, as well as the towns to the countryside, and improved public transport connections, including light rail route to the Airport, new railway stations and the delivery of active travel infrastructure within settlements. This is to resolve existing issues of over-reliance on cars, road congestion, and long commuting, which highly depend on housing location.

Finally, most respondents focused on the need to create better connected, less car-reliant communities. Others believing that the transition to a less car reliant future will be slow, suggested that new development should be placed along existing road infrastructure (M5, A370 and A371) to provide better accessibility.



- **Prioritise development on brownfield land:** This came out as a prime consideration by most respondents, who were keen to see the Council exploring new opportunities of renewal within the towns and high streets, before allocating growth anywhere else. Most respondents favoured the allocation of maximum growth on brownfield sites within existing settlements which are well-connected and sustainable, through the re-purposing of vacant buildings and sites, or conversion of offices and retail spaces affected by the Covid-19 crisis, and through attempting to increase urban densities and the quality of design where possible.
- **Planning constraints:** Respondents referred to a number of constraints to development. Many respondents stated their preference to not allow development in areas of flood risk (Flood Zone 2 & 3), whilst other emphasised on the promotion of flood resilient designs instead. Other respondents highlighted the need to preserve biodiversity and therefore, areas of ecological importance should be protected. Finally, the protection of countryside and other green spaces were mentioned by many respondents.
- New town/village: A few respondents described their ideas of creating new town/villages in order to meet the housing targets. Most respondents described the new settlement as a self-sufficient eco-community adhering to the garden village principles. Potential locations include South West Bristol (Vale) where good public transport or cycling links to Bristol can be achieved, or outside the Green Belt in Mendip Springs.



Question 8 and 8a: Site submissions, interim Sustainability Appraisal, further comments and Town and Parish Council response.

This section of the questionnaire allowed respondents to upload specific sites that they wished to be considered through the Call for Sites process, add any further information, respond to and comment on the Interim Sustainability Appraisal and make general further comments. 487 comments were submitted in this section, of which over 70 were specific sites being promoted by landowners/developers which are set out in Appendix 2.

In terms of further comments received many of them reiterated the comments received for the previous questions.

Many respondents stressed the importance of protecting the countryside for many different reasons. These included the need to protect agricultural land for food production, the need to protect wildlife and biodiversity and support the climate change agenda and the importance of green spaces and access to the countryside for health and wellbeing, particularly at the moment during the Covid-19 pandemic.

In relation to the climate emergency and tackling climate change many respondents felt that it was important to place much more emphasis on ensuring new homes were sustainable and energy efficient with solar panels, electric vehicle charging facilities and heat source pumps. It was also felt that the plan needed to look at wider issues of sustainable power generation for North Somerset and identify sites for wind turbines and investigate sites for solar farms, tidal power and heat recovery. Additionally, some people felt that building any new homes at all conflicts with the climate emergency message, whilst others understood new homes were needed but should be delivered in the most sustainable locations in a way that would most minimise the impact on the climate.

There was a general feeling that the impact of Covid-19 needs to be taken into account particularly in terms of future commuting patterns and locations that people may want to live if they are working from home more often. Proximity to work or places of employment may no longer be such a consideration in deciding where people live and rural location may become more sought after. Equally, use of public transport may decrease as may congestion on the roads. It was also felt that if more people are working from home and shopping online fast reliable internet is essential with any new development.

The impact of more housing on service and facilities was raised as a major concern both in towns and villages and the importance of new infrastructure, both transport and social infrastructure, to support the new housing was emphasised. There was also concern about the impact new housing development would have on the character of villages in North Somerset.



Again, in this section respondent emphasised the importance of utilising empty offices, shops and commercial premises for housing before looking at developing on greenfield sites.

Many respondents also commented on the need for a wide variety of new homes to be built including smaller properties for first time buyers and downsizers which would free up existing larger family homes. The need for more affordable housing was emphasised as was the importance of good design and well planned places with lots of green infrastructure and the ability to walk and cycle to services and facilities.

There was a lot of positive feedback in terms of the format and structure of the Choices consultation particularly in terms of the questionnaire. However, people did say that they hoped that there would be opportunity for face to face meetings at the next stage of the Local Plan consultation when specific sites would be consulted on.

Interim Sustainability Appraisal

Alongside the Choices for the Future document an <u>interim Sustainability Appraisal</u> was published. A number of respondents made specific comments on this document.

Many comments acknowledge that the Sustainability Appraisal has been carried out at an appropriate high level and many agreed with the overall assessment. Some consultees have provided alternative sustainability assessments of individual places. Specific comments were received on the 16 sustainability framework objectives. This included whether weighting could be applied to certain objectives, for example suggesting those relating to climate change and biodiversity should be given more weight. Other comments requested that the scoring criteria to measure some of the sustainability objectives be amended.

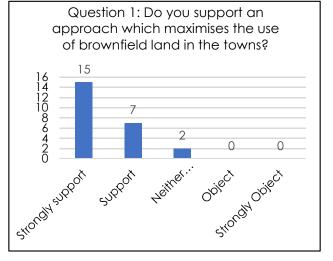
For example, it was mentioned that access to some services and facilities may not require as frequent access as others, and indeed can be accessed purely online, and this should be reflected within the assessment. The criteria applied to walking, cycling distances and access to sustainable transport was questioned by some. A review of these 'accessibility criteria' will be carried out as a result. Others suggested that an updated evidence base is required to allow assessment of some of the objectives, this includes an up-to-date survey of major employers. This and all other suggestions received will be reviewed ahead of further Sustainability Appraisal.

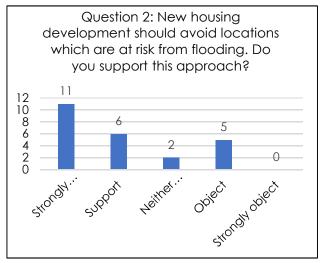


Town and Parish Councils

25 out of 38 Town and Parish Councils responded to the consultation with 23 responding directly onto the online questionnaire. The charts below give an overview to the responses from the town and parish councils.

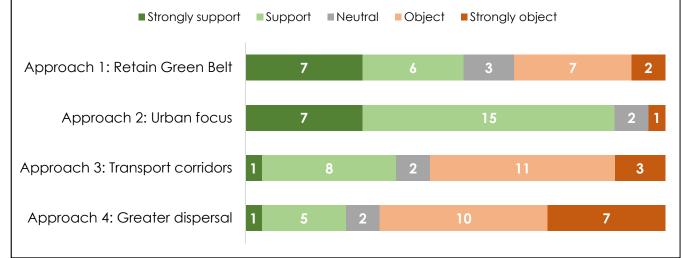
The two charts show that the majority of town and parish councils supported prioritising the development of brownfield land. Responses from town and parish councils were more mixed in relation to avoiding putting new development in locations at risk of flooding. The majority of town and parish councils supported this approach although 5 objected. Reasons for objecting to the approach were because it was felt flood risk areas should be prioritised before Green Belt, flood risk areas in sustainable locations should be considered and that innovative building designs can provide solutions and there are examples of this in other countries.





In terms of the four approaches the chart below gives an overview of how town and parish councils felt about each approach:

The chart shows that there is most support for the Urban Focus Approach with 22 town and parish councils either strongly supporting or supporting this approach. The least popular approach is the Greater Dispersal with 17 town and parish councils either objecting or strongly objecting to this approach. The Retain the Green Belt approach had a mixed response with 13 overall supporting this approach and 9 either objecting or strongly objecting. The Transport Corridor approach also had more town and parish councils objecting to it than supporting it with 14 overall objections and 9 either supporting or strongly supporting.



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3. Conclusions and Next Steps

Overall Conclusions:

There are some clear overall conclusions that can be drawn from the responses received to the Choices to the Future consultation. It must however be appreciated that this was a consultation intended to inform the plan-making process, not a referendum on the choice of spatial strategy.

Firstly, that there was overwhelming support for an approach that maximises the use of brownfield land. It was generally felt that this was the most sustainable approach in terms of locating development near to existing facilities, services, jobs and public transport and a recognition that it would benefit towns through the regeneration of disused sites. It was also felt that it would reduce the amount of greenfield site needed.

Secondly, there was overall support for an approach that avoids building in areas at risk of flooding. One of the main reasons for this was concern that the risk of flooding would get worse with climate change and so these areas should be avoided.

Thirdly, the Urban Focus approach had the most support as people generally felt that it would deliver the most sustainable pattern of development and met the strategic priorities. The Retain the Green Belt approach was the second most popular, although a number of respondents who, although in principle opposed development in the Green Belt, did feel that if necessary there could be a release of land in the Green Belt at south west Bristol on the edge of the city, if it meant that the rest of the Green Belt was protected. There were also some suggestions that if Green Belt land was lost at south west Bristol the Green Belt should be extended elsewhere in the district.

Fourthly, there were mixed feeling about the Transport Corridor approach with respondents being able to see both the pros and cons of this approach and there was roughly an even split between those who supported it and those who objected to it. The Greater Dispersal approach was clearly the least popular approach with 58% of respondents objecting to it.

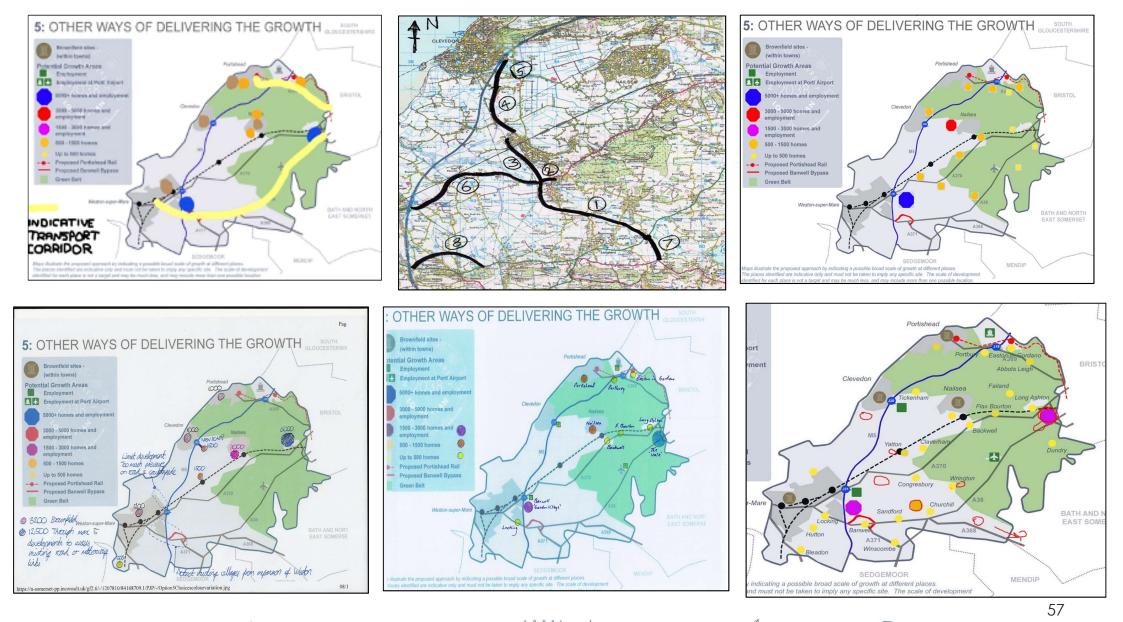
Finally, in terms of the suggestions for alternative approaches we received most people felt that a hybrid of all or some of the approaches consulted on was the best option and the most popular hybrid scenario involved incorporating elements of the Urban Focus together with the Transport Corridors approach

Next Steps

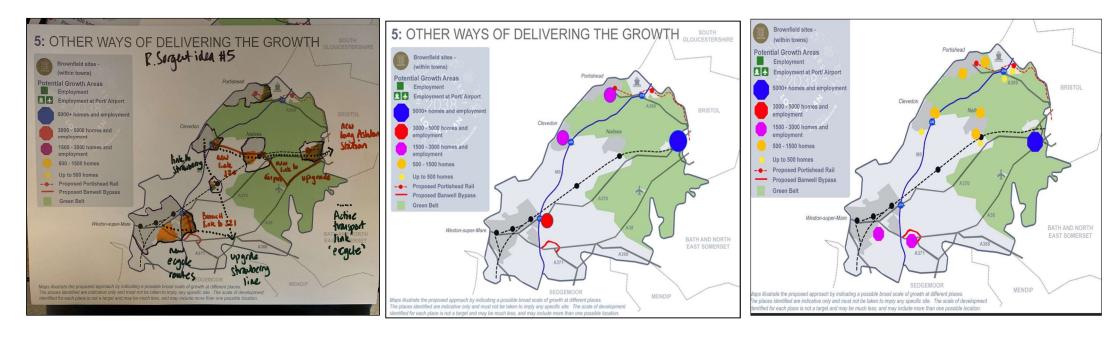
All of the feedback we have received during the Choices consultations will be carefully considered as we progress to the next stages of the plan-making process. The next stage is to formulate a preferred spatial strategy based on comments received through this consultation as well as technical evidence and advice. The preferred spatial strategy will then provide the framework for the Consultation Draft Local Plan to be consulted on later in the year.

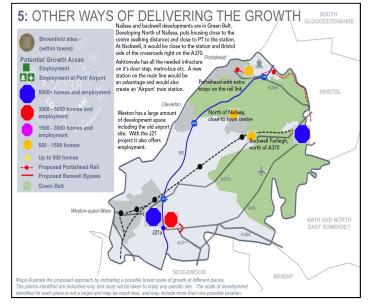


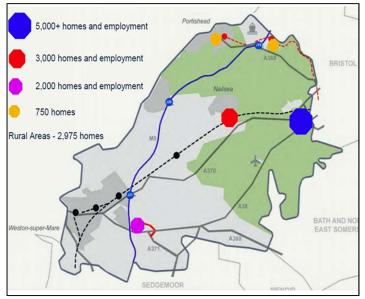
Appendix 1: Maps submitted as part of Question 7 suggesting alternative approaches.



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Appendix 2: Sites submitted through the Choices Consultation

There were over 70 sites submitted through the Choices consultation which are set out in the schedule below. A small number of these were new sites that hadn't been submitted in previous call for sites or previously assessed through the Strategic Housing Land Availability Assessment (SHLAA) process. The rest were sites that had already been submitted or slight amendments to boundaries of existing sites. All these sites have now been mapped as part of the Strategic Housing Land Availability Assessment.

No.	Site Name
1	Greenway Farm, Weston-super-Mare
2	Land at North West Nailsea
3	Holt Farm, Blagdon.
4	Church Lane, Portbury
5	Land off Long Ashton Road
6	Land East of Lime Kiln Roundabout/South of A38 (Bridgwater Road)
7	Land south of Nailsea
8	Land East of Backwell (53ha)
9	Land north of Congresbury.
10	Land at St Georges, W-S-M
11	Summer Lane, Banwell - 2.45 ha
12	Land by A371, Locking Village - 2 ha
13	Land at Banwell Garden Village.
14	Land to the North of Churchill.
15	Land at Black Rock, Portishead.
16	Bridge Farm, Weston-super-Mare.
17	Berwyn House and Land, Youngwood Lane, Nailsea
18	Oak Farm, Ebdon Road, Weston-super-Mare.
19	3 parcels of land around Failand totally 39.90 ha.
20	Site in Bleadon.
21	Leigh Court Centre, Pill Road.
22	Elm Grove Nursery.
23	Land off Bristol Road, Nailsea
24	Land off Bristol Road, Nailsea. (Same as above but bigger).

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No.	Site Name
25	Land off Bristol Road, Nailsea. (Same as above but different area).
26	Land north of Churchill off Ladymead Lane, Langford.
27	Land at Court House Farm, Eadton-in-Gordano.
28	Land East of Clevedon.
29	Land West of Portbury
30	Parcels of land north west of Banwell.
31	Land at Sandford
32	Land of on the corner of Knightcott Road and Summer Lane, Banwell
33	Lynchmead Farm, W-s-M
34	Land between Clevedon and Portishead and around Walton-in-Gordano and Walton Bay.
35	The paddock to the west of Oak Farm, Ebdon Road, Wick St Lawrence, Weston-super-mare
36	Land to the north of the former UTAS Site, Bishops Road, Claverham
37	Locking Parklands, Locking
38	Dolphin Square, Sunnyside Road and Locking Road Car Park in Weston, super-Mare
39	Land at Winterstoke Rd (former Sweat FA)
40	Weston Links site "
41	Former Moss Land, Locking
42	Extension to Former Moss Land, Locking
43	Former research station at Hutton Moor, Weston Super Mare
44	Grove Farm, Backwell.
45	Belmont Estate, Wraxall.
46	Land off Colliters Way, Highridge, Bristol.
47	Land at Backwell, Flax Bourton and Failand.
48	Land at Failand
49	Land behind 44 Clevedon Road, Tickenham, BS21 6RB
50	Land at Park Farm, Congresbury.
51	Land at Rushmoor Lane, Backwell.
52	Land at William Daw Close, Banwell
53	Sites to support transport corridor approach.
54	Land south of Clevedon Road, Portishead
55	Land off Butts Batch, Wrington

No.	Site Name
56	Land at Yatton Rugby Club, Yatton
57	Land at Cobthorn Farm, Congresbury
58	Land to the east of Brinsea Road, Congresbury
59	Baytree Farm, Knightcott Road, Banwell
60	Bourton, W-s-M
61	Land at Congresbury Bridge, Congresbury
62	Elborough Farm
63	Land at J21, Weston-super-Mare.
64	Land North of Nailsea.
65	Norton, W-s-M
66	Parklands, W-s-M
67	Land South of Bristol Road, Langford, Churchill.
68	Land at Winscombe
69	Land at Kewstoke
70	Land at Stowey Road, Yatton.
71	Land at Yatton

