



Campaign to Protect
Rural England
Standing up for your countryside

**Response to North Somerset
Core Strategy Consultation on consequential changes to
referred policies CS6, CS14, CS19, CS28, CS30, CS31, CS32,
CS33
December 2015**

CPRE North Somerset welcomes the opportunity to comment on the consequential changes to referred policies brought about by the revised housing target of 20,985 dwellings for North Somerset. We disagree this housing target is an appropriate number for North Somerset, have consistently argued against this increase and contend that the process to decide housing numbers is flawed. Our recent CPRE publication 'Set up to Fail' - why housing targets based on flawed numbers threaten our countryside and Housing Vision and Tibbalds 'Smarter SHMAs a view of objectively assessed need in England' commissioned by CPRE explains why. See <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside>

and

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4145-smarter-shmas-a-review-of-objectively-assessed-need-in-england>

Given this number has been imposed we offer comment on the consequential changes to referred policies

Policy CS6 North Somerset's Green Belt

We support the policy that Green Belt boundaries will remain unchanged during the plan period. *Green Belt Myths: CPRE's guide to what you need to know, August 2015 (attached)* sets out CPRE's continued support for Green Belt.

In relation to Bristol Airport, we see no reason to make reference to amendments to the Green Belt at Bristol Airport as long term development needs have already been identified and exceptions have already been made by providing an inset in the Green Belt for future development. We suggest this reference is unnecessary and recommend it be removed.

Policy CS14 Distribution of new housing

We support the hierarchy approach to new housing development and would want this to be proportionally distributed to the most sustainable urban locations.

Policy CS19 Strategic Gaps

We support and recognise the importance of strategic gaps to help retain the separate identity, character and landscape setting of settlements and distinct parts of settlements.

Policy CS28 Weston-super-Mare

We support the ambitions for growth in Weston-super-Mare. There are opportunities to reuse previously developed land and efforts should be made to encourage these sites to come forward. CPRE publication ‘From wasted space to living spaces’ explains our approach to brownfield land

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/3785-from-wasted-space-to-living-spaces?highlight=WyJ3YXN0ZWQiLCInd2FzdGVkliwic3BhY2UiLCInC3BhY2UiLCJzcGFjZSciLCJzcGFjZScsliwid2FzdGVkIHNwYWNlIi0=>

We also support an enhancement to its green infrastructure and improving accessibility for walking, cycling and public transport to local facilities. We note the policy recognises the issues of deprivation and inequality particularly in South Ward and Central and would expect that future development meets the needs of the whole population including addressing the housing needs of the most vulnerable.

Policy CS30 Weston Villages

We continue to support the employment led development at Weston Villages but recognise the challenges faced by increased housing numbers and their impact on the balance between houses and jobs. Good quality, mixed development achieving a target of 30% affordable and with local facilities, should aid the development of new functional communities. We acknowledge and support the policy for strategic gaps between the Weston Villages and Hutton and Locking.

Policy CS31 Clevedon, Nailsea and Portishead

We support proposals for development in these locations but have concerns for the apparent lack of jobs in Nailsea that could contribute to more out commuting. As proposed, development should improving the mix and balance of housing types and tenure to help meet local need and any new schemes outside the settlement boundary should be supported by the local community.

Policy CS32 Service villages

CPRE supports the proposals for residential development **WITHIN** the settlement boundaries of service villages. Any development outside development boundaries should meet identified local need and be supported by the local community. North Somerset Service villages are not equal in their ability to offer the services and public transport facilities that would make them a sustainable location and this should be recognised. ‘Small scale’ needs to be defined as more recently it has been interpreted by speculative developers to mean what the public would recognise as large scale development.

Policy CS33 Smaller settlements and countryside

We support the policy within rural areas outside Service Villages to be strictly controlled to protect their character and unsustainable development that would impact negatively on the landscape.

Additionally we attach for information a CPRE document:

Local Plans: Submission of CPRE to the Expert Group established by the Department of Communities and Local Government - October 2015.

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December 2015